**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**
**SAN DIEGO REGION**

## Mitigated Negative Declaration

**Project Title**: Adoption of Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County.

**Resolution Number:** R9-2025-0054.

This Mitigated Negative Declaration is comprised of this form along with the Initial Study that includes the completed Environmental Checklist Form.

1. **California Environmental Quality Act, Mitigated Negative Declaration Findings:**
   a. This Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis;
   b. The decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period; and
   c. On the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration) there is no substantial evidence that the project will have a significant effect on the environment.

2. **Required Mitigation Measures:** See the enclosed Initial Study. Order No. R9-2025-0125, *Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County* (Order No. R9-2025-0125), prescribes requirements for the implementation of effective management measures, and structural and non-structural best management practices to mitigate environmental impacts from discharges of waste to land at the Pine Hill Egg Ranch and the Pullet Farm.

3. **Critical Project Design Elements That Must Become Conditions of Approval**: None.

4. **Adoption Statement:** The California Regional Water Quality Control Board, San Diego Region approved this Mitigated Negative Declaration and the above California Environmental Quality Act findings on October 8, 2025.

DavidWGibson
Digitally signed by DavidWGibson
Date: 2025.10.15 09:59:55 -07'00'

**David W. Gibson**
Executive Officer

# CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
# SAN DIEGO REGION

# INITIAL STUDY AND ENVIRONMENTAL CHECKLIST FOR THE ADOPTION OF WASTE DISCHARGE REQUIREMENTS FOR DEMLER BROTHERS LLC, PINE HILL EGG RANCH AND PULLET FARM, RAMONA, SAN DIEGO COUNTY

## DEVELOPED IN ACCORDANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

## PURSUANT TO PUBLIC RESOURCES CODE SECTIONS 21000 THROUGH 21177 AND CALIFORNIA CODE OF REGULATIONS TITLE 14 SECTIONS 15000 THROUGH 15387

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**2375 NORTHSIDE DRIVE, SUITE 100, SAN DIEGO, CA 92108**

# CALIFORNIA ENVIRONMENTAL QUALITY ACT
# INITIAL STUDY AND ENVIRONMENTAL CHECKLIST

## A. PROJECT TITLE:

Adoption of Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County

## B. LEAD AGENCY:

California Regional Water Quality Control Board, San Diego Region (San Diego Water Board)

## C. LEAD AGENCY'S CONTACT PERSON:

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## D. SURROUNDING LAND USES AND SETTING:

The Pine Hill Egg Ranch encompasses approximately 362 acres of farmland, and the Pullet Farm occupies 200 acres of farmland. Both properties are zoned as A-72 (General Agriculture) and have a Rural Lands (RL-40) general plan land use designation. This zoning permits various agricultural activities, including crop cultivation and livestock raising. The surrounding area is predominantly rural, characterized by agricultural operations, ranches, and open spaces. Nearby properties include other agricultural lands and residential estates, contributing to the region's agricultural character. Ramona receives an average of 16 inches of rain per year, with the majority occurring from November through March. There are two distinct seasons in Ramona. Summer dry weather (89.9°F- 63.7°F) occurs from late April to mid-October. During this period almost no rain falls. The winter season (mid-October through early April; 62.8°F- 44.6°F) consists of generally dry weather interspersed by occasional rainstorms. Eighty-five to ninety percent of the annual rainfall occurs during the winter season.

## E. PROJECT DESCRIPTION:

Introduction:

The project is the adoption of Order No. R9-2025-0012, *Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County* (Order).[1] The Order regulates discharges of waste at Pine Hill Egg Ranch and Pullet Farm

[1] Order No. R9-2025-0012 is available at:
https://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/orders2025.html

(collectively referred to as the Facilities), which include the discharge of egg wash process water at the Pine Hill Egg Ranch to onsite evaporation ponds and discharge of animal waste[2] at both Facilities.

In preparing this environmental analysis, the San Diego Water Board has considered the pertinent requirements of State law. The San Diego Water Board must comply with the requirements specified in the California Environmental Quality Act (CEQA)[3] prior to issuing the Order. Under CEQA, the San Diego Water Board is the Lead Agency for evaluating the environmental impacts of the discharges regulated by the Order, and of the reasonably foreseeable methods of compliance with the proposed Order.

Background:

Demler Brothers LLC (Discharger) owns and operates the Facilities, as shown in Figure 1. Background information on the Facilities is provided below.

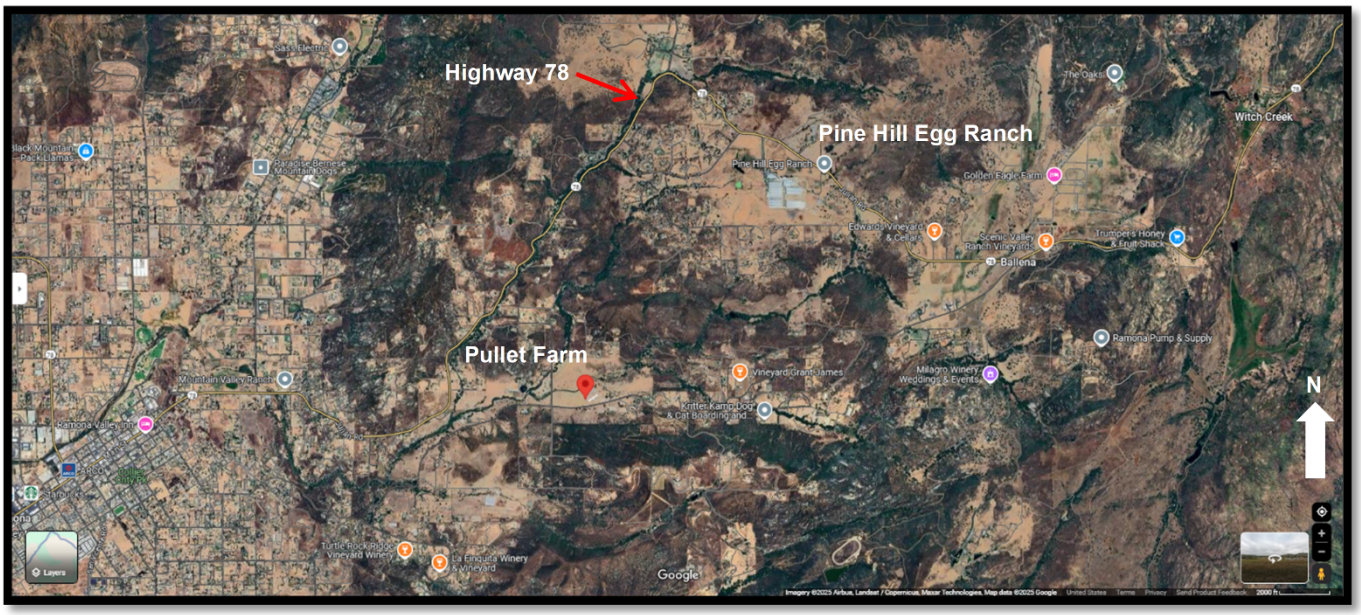


Figure 1. Location of Pine Hill Egg Ranch and the Pullet Farm.

**Pine Hill Egg Ranch**

Pine Hill Egg Ranch is located at 25818 Highway 78, Ramona CA 92065, San Diego County. Pine Hill Egg Ranch is an egg production facility on 362 acres of farmland and has operated since 1974. Historically used for agriculture, the Pine Hill Egg Ranch is situated near outdoor livestock farms, equestrian facilities, and agricultural operations, including vineyards and orchards. A Negative Declaration prepared in 1987 for Pine Hills Egg Ranch, Site Plan STP86-125; ER: 86-09-031, was adopted by the County of San Diego on February 20, 1987 (1987 Neg

[2] Animal waste includes manure, soiled bedding, urine, eggs, feathers generated from Pine Hill Egg Ranch or the Pullet Farm.
[3] Public Resources Code (Pub.Resources Code) section 21000 et seq.

Dec). The 1987 Neg Dec found the project, as proposed at that time, would not have any potentially significant effects on the environment.

The adopted 1987 Neg Dec assessed potential environmental impacts from Pine Hill Egg Ranch, which at the time consisted of a 150-acre project site. The site was subject to a Williamson Act Contract (4P77-231 #9) and STP86-125 authorized the expansion of the existing egg ranch in 1987 in conformance with the Contract. The Site Plan authorized the expansion of the existing chicken ranch, which included 11,500 cubic yards of grading for a building pad, twelve (12) single-story structures with a maximum height of fifteen feet (15'), and an 800-foot concrete drainage channel to handle runoff. Grading Plan L-1046 was approved by the County of San Diego Department of Public Works (DPW) on July 14, 1988, for the grading authorized under STP86-125. The grading was completed on May 8, 1989. In 2012, the County of San Diego approved Major Grading Permit number L-15547, subject to an addendum to 1987 Neg Dec (SCH #2012019014). Permit L-15547, analyzed in the 2012 addendum, authorized the cut and fill of 50,000 cubic yards of material onsite with maximum fill depths of ten feet (10') and a maximum cut depth of nine feet (9'), measured vertically. The grading of the site allowed for the demolition of outdated/obsolete chicken houses, the construction of new automated chicken houses, and an egg processing and packaging facility on the same footprint at the Pine Hill Egg Ranch. A new onsite treatment system (septic system) was required for the proposed processing and packaging facility. There were approximately 1.2 million chickens onsite, and new chickens were not added to the site. Additionally, a herd of approximately 50 cattle is at times kept on the property for weed suppression. Pine Hill Egg Ranch is a large Confined Animal Feeding Operation (CAFO) as defined by Code of Federal Regulations (CFR) title 40, Part 122.23(b)(4).

**Pullet Farm**

The Pullet Farm is a 200-acre pullet-raising farm located at 24555 Old Julian Highway in Ramona, California. Historically used for agriculture, the Pullet Farm is situated near outdoor livestock farms, equestrian facilities, and agricultural operations, including vineyards and orchards. The Pullet Farm houses over 400,000 pullets (young hens). As a result, the Pullet Farm qualifies as a large CAFO, as defined by CFR title 40, Part 122.23(b)(4). The Pullet Farm generates approximately 50 tons of manure per week. Other waste generated includes litter and pullet mortality. The Pullet Farm does not generate any wastewater. Additionally, a herd of approximately 30 cattle is at times kept on the property for weed suppression.

The developed portion of the Pullet Farm spans approximately 10 acres and includes two covered pullet-raising buildings and two detached covered general storage buildings. Currently, there is no existing Negative Declaration for the Pullet Farm; however, the County of San Diego has processed building permits for the residential and commercial structures on the property in 2009, 2010 and 2015, which were determined to be ministerial under CEQA.

Description of the Proposed Activity:

**Pine Hill Egg Ranch**

The project is the adoption of Order No. R9-2025-0012, *Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County*. Pine Hill Egg Ranch houses approximately 1.5 million chickens and has the capacity to house up to

two million chickens and produce approximately 800,000 eggs per day. The Pine Hill Egg Ranch generates approximately 2,000 gallons per day (gal/day) of wastewater from an egg washing operation. The egg washing operation has a process water recycling loop which reduces the volume of egg wash process water sent to the treatment system to about 1,500 gal/day (by about 25 percent). The Pine Hill Egg Ranch treatment system consists of a pass-through wet well with a filter and thirty-four lined evaporation ponds. The filter helps reduce biochemical oxygen demand concentrations in the egg wash process water.

The lined evaporation ponds are housed in four barns. Each barn has a: 1) cover, to prevent stormwater run-on or precipitation from entering into the ponds, and 2) concrete slab, which serves as an additional containment layer to prevent wastewater infiltration into the ground surface. The evaporation ponds are not large in-ground depressions but rather are above ground ponds similar in size to children's swimming or wading pools. Eight ponds are placed in each of the two northern barns (northern ponds), while 9 ponds are placed in each of the two southern barns (southern ponds). The total capacity of all 34 ponds is about 220,000 gallons. A maximum of about 1,240 gallons per day of egg wash process water will be discharged to the evaporation ponds. The anticipated maximum water depth in each pond is 18 inches. The report of waste discharge/waste discharge requirements application submitted by Demler Brothers LLC to the San Diego Water Board on August 28, 2024, specifies that at least 9 inches of freeboard will be maintained in the evaporation ponds (based on water balance calculations). The evaporation ponds will have a double liner, with the primary liner being a 30-mil high density polyethylene (HDPE) liner and the secondary liner 60-mil HDPE.

There are four onsite storage tanks, each with a capacity of 5,000 gallons. Approximately 260 gallons of egg wash process water per day will be stored in one of these tanks. The remaining three tanks will remain empty under normal operating conditions and will serve as contingency storage in case of reduced evaporation rates. Egg wash process water can be pumped from the wet well to either the existing 5,000-gallon storage tanks or directly to the evaporation ponds. The evaporation ponds are expected to precipitate minimal solids annually. Solids accumulated in the wet well are removed using a vacuum truck.

The Pine Hill Egg Ranch also generates animal waste, which includes approximately 440 tons of manure per week, and chicken carcasses. Manure and chicken carcasses are stored temporarily prior to hauling offsite for disposal. Figure 2 shows the location of the Pine Hill Egg Ranch structures.

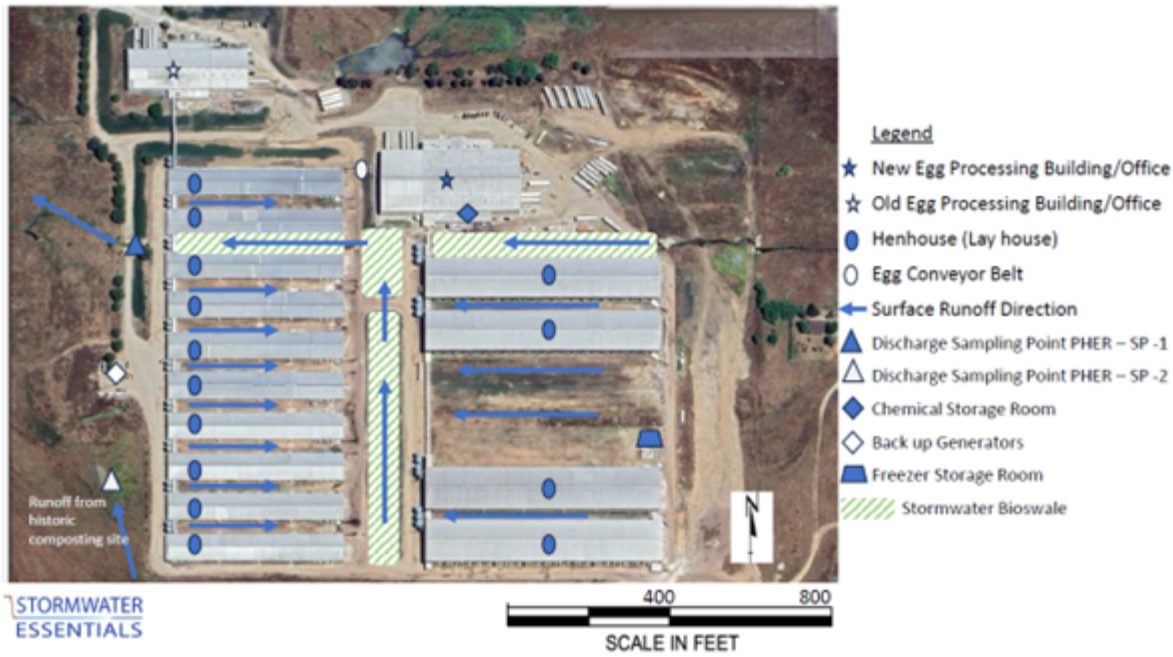


Figure 2. Map Showing location of Pine Hill Egg Ranch Structures and Surface Runoff Direction (Adapted from IGP Nutrient Management Plan for Pine Hill Egg Ranch, Stormwater Essentials, September 9, 2024).

**Pullet Farm**

The Pullet Farm house is an enclosed structure where manure is deposited on the floor by pullets. To maintain pullet health and prevent nuisance odors and flies, the manure levels are checked weekly. Pullets produce significantly less manure than mature hens. On average, the Pullet Farm generates one truckload of manure per week or less, with a maximum of two truckloads per week. Seasonal moisture variations affect the weight of manure, and manure volume increases as the pullets grow. Each truck is filled to a maximum weight of 22 tons. Feathers are collected from the premises on an as-needed basis during the summer months, when the cooling fans are on in the pullet houses, as they can blow some feathers outside. Feathers blown outside are very minimal and are collected in plastic garbage bags and added to the manure trucks for disposal. The Pullet Farm does not generate any wastewater. Figure 3 shows the location of the Pullet Farm structures.


Figure 3. Map Showing Location of the Pullet Farm Structures and Surface Runoff Direction (Adapted from IGP Nutrient Management Plan for Pine Hill Pullet Farm, Stormwater Essentials, September 9, 2024).

The project involves the adoption of an Order regulating the discharge of waste. The Order requires the implementation of effective management measures, and structural and non-structural best management practices (BMPs) to address potential impacts associated with animal waste and animal carcasses generated and disposed of from the Facilities, and egg wash process water generated and disposed of at the Pine Hill Egg Ranch.

Analysis of Impacts of the Discharges and Reasonably Foreseeable Methods of Compliance:

This section identifies the potential impacts of the discharges regulated by the Order, and a range of reasonably foreseeable method(s) of compliance with the Order.

The Order regulates the discharge of egg wash process water from the Pine Hill Egg Ranch and requires the Discharger to implement management measures and BMPs to prevent adverse impacts to surface water and groundwater from animal waste (such as manure, soiled bedding, urine, eggs, feathers) and animal carcasses generated at the Facilities.

The most reasonably foreseeable methods that the Discharger may utilize to mitigate the potential impacts to water quality from the type of discharge identified in this document and comply with the requirements prescribed in the Order is to implement management measures and structural and non-structural BMPs. Typical non-structural and structural controls are described below.

**Non-structural Controls:** Non-structural controls typically are aimed at controlling sources of pollution and generally do not involve new construction. Because the types of discharges to be regulated under the Order are not expected to pose a significant threat to the environment, non-structural controls are expected to be the first methods to be utilized by the Discharger. No potentially significant adverse impacts on the environment were identified for these controls. Examples of non-structural controls implemented at the Facilities include the following:

- *Proper Waste Management:* Proper management of wastes will minimize or eliminate the potential for erosion and pollutants to impact waters of the State. Proper waste management can include maintaining adequate setback distances between evaporation ponds, storage tanks, and stockpiles and surface waters and groundwater wells to minimize adverse impacts to waters of the State. Proper waste management also includes complying with local, State, and federal ordinances and regulations and obtaining any required approvals, permits, certifications, and/or licenses from authorized local agencies.
- *Facility Inspection and Maintenance:* Conducting regular inspections of the Facilities will help the Discharger identify potential sources of pollutants and locations where discharged wastes may potentially impact waters of the State. Routine inspection and maintenance are an efficient way to prevent potential nuisances such as odors, mosquitoes, weeds, etc., to minimize or eliminate the potential for erosion and pollutants to impact waters of the State, and to reduce the need for repair maintenance. For example, regular visual inspections of the evaporation ponds can help detect leaks. Leaks should be repaired within 48 hours of detection.
- *Facility Management Plans:* The Facilities maintain Nutrient Management Plans as required by Order 2014-0057-DWQ as amended by Order 2015-0122-DWQ and Order WQ 2018-0028-DWQ, NPDES Permit No. CAS000001, *General Permit for Storm Water Discharges Associated with Industrial Activities* (Industrial General Permit). The Nutrient Management Plans are designed to meet the requirements of title 40 CFR Part 122.42 (e)(1), which include ensuring adequate storage of manure and wastewater, ensuring proper management of animal carcasses, ensuring diversion of clean water from production areas, ensuring proper handling and disposal of chemicals used onsite, etc. The Nutrient Management Plans incorporate Mortality Management Plans.
- *Design, Sizing and Location of Facility:* Proper design, sizing, and siting of waste treatment, storage, conveyance, and disposal facilities or structures will minimize or eliminate the potential for pollutants to impact surface waters or groundwater.
- *Education:* Educating Facilities' staff on the design and operation specifications and monitoring requirements contained in the Order, on potential sources of pollutants, and on methods that may be implemented to comply with the Order can help eliminate the

potential for pollutants to reach waters of the State.

**Structural Controls:** Structural controls may be utilized to divert, store, and/or treat discharges of waste. The construction and operation of structural controls can involve activities that can potentially impact the environment. These activities, however, are expected to have less than significant impacts on the environment for reasons explained in the checklist. Examples of structural controls used at the Facilities include:

- *Treatment System:* The Pine Hill Egg Ranch uses a treatment system which consists of a pass-through wet well with a filter and thirty-four evaporation ponds for onsite treatment and disposal of egg wash process water. The evaporation ponds are housed in two four barns which are constructed on concrete slabs providing an additional layer of containment to protect groundwater quality.

- Concrete Manure Loading Pads: Heavy duty concrete pads have been installed to provide a solid surface for loading manure onto trucks for offsite disposal. These pads help prevent incidental spills from coming into contact with bare soil during loading. Each concrete pad is swept and cleaned after loading activities. Spilled manure or dust on the pads is disposed of in the manure hauling trucks.

- *Vegetated Bioswales:* Vegetated bioswales mitigate erosion and slow runoff (see Figures 2 and 3). The bioswales also channel stormwater runoff to the discharge point and away from the site. Bioswales near the discharge point, located at the west side of the Pine Hill Egg Ranch property, are lined with filter sock check dams that remove pollutants from stormwater.

- *Freezers:* Chicken carcasses are collected daily at the Facilities. At the Pine Hill Egg Ranch, chicken carcasses are placed in 55-gallon trash cans inside the hen houses, kept half-full, and collected daily. The chicken carcasses are then transferred from the trash cans to an onsite insulated freezer located on a concrete pad east of the hen houses. Every 10 days, the chicken carcasses are hauled off in a semi-truck, with scheduling designed to keep the freezer partially full to accommodate variations in mortality rates. At the Pullet Farm, pullet carcasses are collected daily in lidded trash cans inside the pullet houses. The trash cans are emptied daily into a chest freezer located in a room east of the pullet houses. Once per week, or as needed when the chest freezer is full, pullet carcasses are transferred to the Pine Hill Egg Ranch in sealed black garbage bags placed in a truck bed and transported to be combined with hen carcasses for offsite disposal. Depopulation does not occur at the Pullet Farm.

## A. ENVIRONMENTAL IMPACTS:

This project may potentially affect the following checked environmental factors. See the checklist on the following pages for more details.

- ☐ Aesthetics
- ☐ Agriculture and Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Geology/Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology/Water Quality
- ☐ Land Use/Planning
- ☐ Energy and Mineral Resources
- ☐ Noise
- ☐ Population/Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation/Traffic
- ☐ Utilities/Service Systems
- ☐ Mandatory Findings of Significance

Section 1**. AESTHETICS.** Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☐ | ☒ |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? | ☐ | ☐ | ☐ | ☒ |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | ☐ | ☐ | ☐ | ☒ |
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No impact**. Non-structural and/or structural controls implemented would not be of the size or scale that would result in the obstruction of the view of a scenic vista, substantially damage scenic resources, degrade the existing visual character or quality of a site or its surroundings, or create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

b) **No impact**. See response to section F.1.a above.

c) **No Impact**. See response to section F.1.a above.

d) **No Impact**. See response to section F.1.a above.

Section 2. **AGRICULTURAL AND FOREST RESOURCES**. In determining whether impacts to agricultural resources are significant environmental impacts, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping & Monitoring Program of the California Resources Agency, to non-agricultural uses? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land [as defined in PRC section 12220(g)] or timberland (as defined by PRC section 4526)? | ☐ | ☐ | ☐ | ☒ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale that would result in conversion of farmland to non-agricultural uses.

b) **No Impact.** Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale to affect zoning designations established by local land use jurisdictions.

c) **No Impact**. See response to section F.2.b above.

d) **No Impact**. Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale that would result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use.

e) **No Impact.** Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of the size or scale that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use because the use of the land as a farmland requires the land be designated for agricultural use.

Section 3. **AIR QUALITY**. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☐ | ☒ |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | ☐ | ☐ | ☐ | ☒ |
| c) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☐ | ☒ |
| d) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? | ☐ | ☐ | ☐ | ☒ |
| e) Create objectionable odors affecting a substantial number of people? | ☐ | ☒ | ☐ | ☐ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in the obstruction of an applicable air quality plan.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in substantial air emissions or deterioration of air quality or result in violation of an air quality standard. Emissions from Pine Hill Egg Ranch and the Pullet Farm are below the threshold required to obtain a Title V operating permit, issued pursuant to the Clean Air Act. The San Diego County Air Pollution Control District (SDAPCD) is responsible for regulating air quality and issuing air quality permits within San Diego County. SDAPCD regulates odors via a public nuisance rule, however, this rule does

not apply to odors from agricultural operations. The Facilities are considered agricultural operations.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in substantial air emissions or deterioration of air quality or result in exposure of sensitive receptors to substantial pollutant concentrations.

d) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in substantial air emissions or deterioration of air quality or result in a considerable net increase of any criteria pollutants.

e) **Less than Significant Impact with Mitigation Incorporated**. The Facilities are agricultural operations located in land zoned for agriculture. Nonetheless, the Order requires that the Facilities be managed to minimize odors beyond the limits of the Discharger's property and prevent nuisance conditions. The Order requires the Discharger to implement effective management measures and BMPs for the proper handling, storage, and disposal of animal waste and chicken carcasses to reduce the generation of nuisance odors. These measures and practices include, but may not be limited to the:

- Routine collection and disposal of animal waste, at least once a week,
- Temporary storage of chicken carcasses in freezers prior to disposal offsite,
- Periodic inspection of manure storage and handling areas,
- Hand-loading, via shovels, of manure onto conveyor belts inside animal enclosures, which are equipped with transfer chutes to reduce dust as manure is deposited into trucks,
- Use of tarps to cover manure and litter piles, during storage and hauling operations, to further limit windblown particles and spread of nuisance odors.

Additionally, the Order requires the Dischargers to implement effective management measures and BMPs for the proper management of egg wash process water to reduce the generation of nuisance odors. These measures and practices included, but may not be limited to the:

- Use placement of evaporation ponds inside roofed barns with open sides. These barns will provide cover to reduce wind-borne dispersion of aerosols. The sides of the barns are open to allow for ventilation and air circulation.
- Frequent removal of debris and vegetation from the ponds.
- Prevention of pooling egg wash process water outside the ponds.
- Prevention of stagnant water conditions by monitoring pond water depths.
- Use of aerators, diffusers, or other similar technologies.
- Periodic inspection of the ponds.

Construction and installation of structural controls may result in objectionable odors in the short-term due to exhaust from construction equipment and vehicles, but no more so than during typical construction activities currently performed. Structural controls may be a source of objectionable odors if structural control designs allow for water stagnation or collection of water with sulfur-containing compounds. Stormwater runoff is not likely to include sulfur-containing compounds, but stagnant water could create objectionable odors. However, reasonably foreseeable structural controls are not expected to be on a scale large enough

that would result in the significant creation of objectionable odors affecting a substantial number of people.

Section 4. **BIOLOGICAL RESOURCES.** Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (DFW) or United States Fish and Wildlife Service (USFWS)? | ☐ | ☐ | ☐ | ☒ |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the DFW or USFWS? | ☐ | ☐ | ☒ | ☐ |
| c) Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means? | ☐ | ☐ | ☐ | ☒ |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites? | ☐ | ☐ | ☐ | ☒ |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☐ | ☒ |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in substantial adverse effect, either directly or through habitat modifications on any species or special status species in local or regional plans, policies, or regulations.

b) **Less than Significant Impact**. The Order requires that the Discharger implement management measures and BMPs at the Facilities to prevent erosion and control sediment, and that the Discharger divert stormwater and precipitation away from production areas. These management measures and BMPs help prevent adverse impacts to riparian habitats or other sensitive natural communities.

c) **No Impact.** Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in direct removal or filling of riparian habitat, wetlands, or any sensitive natural communities.

d) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in interfering with the movement of any native resident or migratory fish or wildlife species or native resident of native wildlife nursery sites.

e) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) **No Impact**. See responses to sections F.4.a through F.4.e above.

Section 5. **CULTURAL RESOURCES.** Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in Calif. Code Regs. title 14 section 15064.5? | ☐ | ☐ | ☐ | ☒ |
| b) Cause a substantial adverse change in the significance of an archaeological resource as defined in Calif. Code Regs. title 14 section15064.5? | ☐ | ☐ | ☐ | ☒ |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☐ | ☒ |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in a substantial adverse change in the significance of a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains.

b) **No Impact**. See response to section F.5.a above.

c) **No Impact**. See response to section F.5.a above.

d) **No Impact**. See response to section F.5.a above.

Section 6. **GEOLOGY AND SOILS**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | ☐ | ☐ | ☐ | ☒ |
| i) Rupture of a known earthquake fault, as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines & Geology Special Publication No. 42. | ☐ | ☐ | ☐ | ☒ |
| ii) Strong seismic ground shaking? | ☐ | ☐ | ☐ | ☒ |
| iii) Seismic-related ground failure, including liquefaction? Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☐ | ☒ |
| iv) Landslides? | ☐ | ☐ | ☐ | ☒ |
| b) Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☒ | ☐ |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | ☐ | ☐ | ☐ | ☒ |
| d) Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | ☐ | ☐ | ☐ | ☒ |

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| e) Have soils incapable of adequately supporting the use of septic tanks or alternate wastewater disposal systems where sewers are not available for the disposal of wastewater? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact.** Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in exposure of people or structures to geologic hazards because none of these controls would result in earth moving activities. This also response applies to sub-issue sections F.6.a.i through F.6.a.iv.

b) **Less than Significant Impact**. Reasonably foreseeable non-structural controls are not expected to be on a large enough scale that would result in an increase in wind or water erosion of soil, either on or off site because none of the non-structural controls would result in increased surface runoff discharge, or in exposing soils to erosion by wind and water. The Facilities also use BMPs to prevent erosion.

Future modifications to structural controls may result in minor soil excavation. However, construction related erosion impacts will cease with the cessation of construction. Wind or water erosion of soil may occur as a potential short-term impact. Typical established management measures and BMPs should be used during implementation to minimize offsite sediment runoff or deposition. Construction sites are required to retain sediment on site, both under general construction storm water WDRs and through the construction program of the applicable municipal separate storm sewer systems (MS4) WDRs; both of which are already designed to minimize or eliminate erosion impacts on receiving waters.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls will not be located in unstable geologic units and are not expected to be on a scale large enough to potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. In addition, see the response to section F.6.a above.

d) **No Impact**. Reasonably foreseeable non-structural and/or structure controls will not be located in unstable geologic units and are not expected to be on a scale large enough to potentially result in loss of life or property resulting from soil expansion. In addition, see the

response to section F.6.a above.

e) **No Impact**. Reasonably foreseeable non-structural and/or structural controls will not have any effect on siting of septic tanks or alternate wastewater disposal systems.

Section 7. **GREENHOUSE GAS EMISSIONS**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

**DISCUSSION**

a) **Less than Significant Impact**. Construction and installation of structural controls may result in short-term greenhouse gas emissions due to exhaust from construction equipment and vehicles, but not beyond what is typically generated during current construction activities. These reasonably foreseeable structural controls, however, are not expected to be large enough on a scale that would result in significant generation of greenhouse gases. Vehicles used for agricultural operations or for hauling manure, wastewater or other waste generated may also generate greenhouse gases for limited periods, however, these emissions are not expected to be generated in quantities leading to significant impacts on the environment.

b) **Less than Significant Impact**. Reasonably foreseeable non-structural and/or structural controls are not expected to be on a scale large enough that would result in conflict with any applicable plan, policy or agency adopted regulation for the purpose of reducing the emissions of greenhouse gases.

Section 8. **HAZARDS AND HAZARDOUS MATERIALS**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☐ | ☒ |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ | ☐ |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school? | ☐ | ☐ | ☐ | ☒ |
| d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |
| c) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and structural controls are not expected to be of a large enough scale that would create a significant hazard to the environment from transport or disposal of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation).

b) **Less than Significant Impact.** Reasonably foreseeable non-structural and structural controls will not result in the release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation) as a result of a reasonably foreseeable upset or accident condition. The reasonably foreseeable non-structural and structural BMPs included in this evaluation would not cause the release of hazardous substances in the event of an accident because these types of substances would not be present.

c) **No Impact.** Reasonably foreseeable non-structural and structural controls will not involve emission or handling of hazardous substances or waste**.** In addition, the Facilities would not induce a project that would involve emission or generation of hazardous wastes.

d) **No Impact.** Reasonably foreseeable non-structural or structural controls will not result in a safety hazard to people working or residing within an area within an airport land use area, two miles of an airport, or a private airstrip. In addition, the Facilities are not located within two miles of a public airport or airport land use plan.

e) **No Impact.** See response to section F.8.d above.

f) **No Impact.** See response to section F.8.d above.

Section 9. **HYDROLOGY AND WATER QUALITY**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Violate any water quality standards or waste discharge requirements? | ☐ | ☒ | ☐ | ☐ |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | ☐ | ☐ | ☐ | ☐ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on-or off-site? | ☐ | ☐ | ☐ | ☒ |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site? | ☐ | ☐ | ☒ | ☐ |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | ☐ | ☐ | ☒ | ☐ |
| f) Otherwise substantially degrade water quality? | ☐ | ☒ | ☐ | ☐ |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | ☐ | ☐ | ☐ | ☒ |

**9. HYDROLOGY and WATER QUALITY (continued).** Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| h) Place housing within a 100-year flood hazard area structures which would impede or redirect flows? | ☐ | ☐ | ☐ | ☒ |
| i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? | ☐ | ☐ | ☐ | ☒ |
| j) Inundation by seiche, tsunami, or mudflow? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **Less than Significant Impact with Mitigation Incorporated**. The Order requires the Discharger to implement management measures and BMPs for proper handling, storage, transport, and disposal of animal waste and animal carcasses (described on pages 7 and 8). These management measures and BMPs are expected to prevent adverse impacts to water quality and prevent violations of water quality standards.

Egg wash process water at the Pine Hill Egg Ranch will be discharged to lined evaporation ponds. As a result, there would be no infiltration of egg wash process water to groundwater, thus preventing impacts to quality or beneficial uses of waters of the state. The use of lined evaporation ponds will also prevent any violations of applicable water quality standards of the *Water Quality Control Plan for the San Diego Basin (9)* (Basin Plan). Controls such as vegetated bioswales will reduce erosion, allow for infiltration of stormwater, and help reduce pollutants in stormwater runoff.

The Order further requires the Discharger to demonstrate compliance with water quality and beneficial use requirements through the implementation of a groundwater monitoring program. The Discharger is required to develop a groundwater monitoring program, which include the annual collection and analysis of groundwater samples. Groundwater samples will be collected from monitoring wells and/or existing supply wells, approved by San Diego Water Board staff. The Discharger is required to provide the San Diego Water Board with an annual report, that evaluates and summarizes groundwater conditions and the effectiveness of management measures and BMPs.

b) **No Impact**. Non-structural and/or structural controls that promote or utilize infiltration of surface runoff may have localized effects on groundwater quantity. Localized effects may

include increases rather than decreases in groundwater supply. Therefore, the potential increase in quantity is not expected to have any adverse effects on groundwater recharge or lead to the lowering of groundwater levels.

c) **No Impact**. Structural and non-structural controls would not be of the size or scale to result in significant changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff. Implementation of the management measures and BMPs required by the Order are expected to minimize the amount of erosion occurring on and off site.

d) **Less than Significant Impact**. Non-structural controls would not result in changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff because none of these controls would introduce any physical effects that could impact these characteristics.

Depending on the structural controls selected, absorption rates, drainage patterns, and surface water runoff conditions may change. Grading and excavation during construction and installation of structural controls could result in alterations in absorption rates, drainage patterns, and surface water runoff. Several types of structural controls collect and/or inhibit surface water runoff flow, which would likely alter drainage patterns, and also decrease the rate and amount of surface water runoff. For example, structural controls such as spilling absorbent socks would change drainage patterns by increasing absorption rates, which would reduce the amount of surface water runoff to creeks. The amount of flow within the stream channel may change; however, the channelized drainage pattern would remain essentially unchanged. This project is not expected to be of the size or scale that could result in significant changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff.

e) **Less than Significant Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Implementation of management measures and BMPs are expected to minimize the amount of polluted runoff.

f) **Less than Significant Impact with Mitigation Incorporated**. See response to section F.9.a above.

g) **No Impact**. The project does not entail construction of new housing. The Order will also not induce or approve construction of new housing. Any housing or construction project would have to prepare a separate project level CEQA analysis for the construction project which must evaluate impacts on hydrology and water quality and obtain any necessary permits from the appropriate public or government agencies (e.g., building permits, clearing and grading permits, or permits under the Federal Clean Water Act, etc.) to the extent required.

h) **No Impact**. Reasonably foreseeable structural controls are not expected to be of the size or scale that would place housing in a 100-year flood hazard area. In addition, see the response to section F.9.g above.

i) **No Impact.** Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in exposure of people or property to water-related hazards such as flooding.

j) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in exposure of people or property to water-related hazards such as inundation by seiche, tsunami, or mudflow.

Section 10. **LAND USE AND PLANNING**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in physical division of a community.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in conflict with any applicable habitat conservation plan or natural community conservation plan.

Section 11. **MINERAL RESOURCES**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State? | ☐ | ☐ | ☐ | ☒ |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in loss of availability of a known mineral resource.

b) **No Impact.** Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale to result in loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Section 12. **NOISE.** Would the project result in:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☐ | ☐ | ☒ |
| b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☐ | ☒ |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☐ | ☒ |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing in or working in the project area to excessive noise levels? | ☐ | ☐ | ☒ | ☐ |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing in or working in the project area to excessive noise levels? | ☐ | ☐ | ☒ | ☐ |

**DISCUSSION**

a) **No Impact**. Non-structural and structural controls would not result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. None of these controls would introduce any physical effects that could impact these characteristics.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not result in exposure to, or generation of, excessive groundborne vibration or groundborne noise levels

because the controls would not introduce any physical effects that could impact these characteristics.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not result in a substantial permanent increase in ambient noise levels in the project vicinity because the controls would not introduce any physical effects that could impact these characteristics.

d) **Less than Significant Impact**. The construction and installation of structural controls could result in minimal temporary increases in existing noise levels, but any impacts are expected to be short term, localized impacts that would exist only in close proximity to the construction area. The type and duration of noise impacts due to installation of any structural controls are not expected to be significant.

e) **Less than Significant Impact**. See response to section F.12.d above.

f) **Less than Significant Impact**. See response to section F.12.d above.

Section 13. **POPULATION AND HOUSING**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Induce substantial population growth in an area either directly (*e.g.*, by proposing new homes and businesses) or indirectly (*e.g.*, through extension of roads or other infrastructure)? | ☐ | ☐ | ☐ | ☒ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would alter the location, distribution, density, or growth rate of the human population of an area.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would displace substantial numbers of people or housing necessitating the construction of replacement housing elsewhere.

c) **No Impact**. See response to section F.13.b above.

Section 14. **PUBLIC SERVICES**. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Fire protection? | ☐ | ☐ | ☐ | ☒ |
| b) Police protection? | ☐ | ☐ | ☐ | ☒ |
| c) Schools? | ☐ | ☐ | ☐ | ☒ |
| d) Parks? | ☐ | ☐ | ☐ | ☒ |
| e) Other public facilities? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a need for new or altered fire protection services, police protection services, schools, parks, or other public facilities.

b) **No Impact**. See response to section F.14.a above.

c) **No Impact**. See response to section F.14.a above.

d) **No Impact**. See response to section F.14.a above.

e) **No Impact**. See response to section F.14.a above.

Section 15. **RECREATION**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☐ | ☐ | ☐ | ☒ |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact.** Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in an increase in use of existing neighborhood and regional parks or other recreational facilities; nor would the controls be of the size or scale to cause substantial physical deterioration of recreational facilities because need for new or altered fire protection services, police protection services, schools, parks, or other public facilities.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would include or require construction or expansion of recreational facilities.

Section 16. **TRANSPORTATION/ TRAFFIC**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | ☐ | ☐ | ☐ | ☒ |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | ☐ | ☐ | ☐ | ☒ |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | ☐ | ☐ | ☐ | ☒ |
| e) Result in inadequate emergency access? | ☐ | ☐ | ☐ | ☒ |
| f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in exceeding capacity of the existing circulation system.

b) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in conflict with an applicable congestion management plan.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a change to air traffic patterns, or alterations to air traffic.

d) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in substantial increase in hazards due to a design feature due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). In addition, the Order requires the Discharger to comply with all regulations overseen by local, state, or federal agencies, and obtain any applicable local, state, or federal agency permits. This may include, but may not be limited to, transportation and traffic related activities associated with construction, operation, or maintenance of the Facilities.

e) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in inadequate emergency access.

f) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a conflict with adopted policies, plans, or programs supporting alternative transportation.

Section 17. **UTILITIES AND SERVICE SYSTEMS**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | ☐ | ☐ | ☐ | ☒ |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts? | ☐ | ☐ | ☒ | ☐ |
| c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts? | ☐ | ☐ | ☐ | ☒ |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | ☐ | ☐ | ☐ | ☒ |
| e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | ☐ | ☐ | ☒ | ☐ |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | ☐ | ☐ | ☐ | ☒ |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**

a) **No Impact**. A treatment system which consists of a wet well with a filter and lined evaporation ponds will be used for treatment and disposal of egg wash process water from the Pine Hill Egg Ranch. The evaporation ponds contain an HDPE liner and will be installed within two existing barns and placed on concrete slabs (within the barns). The treatment system will be designed to meet the requirements of the Order and designed to receive up to 1,240 gal/day of egg wash process water. Any excess egg wash process generated will be stored onsite and hauled offsite for disposal. As a result, the operation of the treatment systems is not expected to exceed wastewater treatment requirements issued by the San Diego Water Board. Egg wash process water will be discharged to lined evaporation ponds. As a result, there will be no infiltration into groundwater from the ponds. The ponds will also be managed and operated to prevent odors or nuisance conditions. No egg process water is generated at the Pullet Farm.

   In addition, the Facilities use septic systems for treating domestic wastewater and are not connected to a sanitary sewer system or wastewater treatment plant. These septic systems are appropriately regulated by the County of San Diego Department of Environmental Health and Quality and are not regulated by the San Diego Water Board.

b) **Less than Significant Impact**. See response to section F.17.a above.

c) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in the construction of new stormwater drainage facilities or expansion of existing facilities.

d) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in a substantial increase in water use or result in the need for new or substantial alterations to water supplies.

e) **Less than Significant Impact**. See response to section F.17.a above.

f) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in the construction of new landfills or expansion of existing landfills.

g) **No Impact**. Reasonably foreseeable non-structural and/or structural controls would not be of the size or scale that would result in violation of federal, state, and local statutes related to solid waste.

Section 18. **MANDATORY FINDINGS OF SIGNIFICANCE**. Would the project:

| Issues (and Supporting Information Sources): | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☐ | ☒ | ☐ |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) | ☐ | ☐ | ☒ | ☐ |
| c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☐ | ☒ | ☐ |

**DISCUSSION**

a) **Less than Significant Impact**. As discussed above in the Biological Resources section F.4 of this Initial Study, plant and animal species could potentially be affected due to the reduction or elimination of nuisance flows, especially in the dry weather season. However, this project non-structural and/or structural controls are not expected to be of the size or scale that could result in significant changes that could have an adverse effect on native plant and animal species.

b) **Less than Significant Impact**. Cumulative impacts, defined in California Code of Regulation title 14, section 15355 (i.e., CEQA Guidelines), refer to two or more individual effects, that when considered together, are considerable or that increase other environmental impacts.

Cumulative impacts associated with complying with the Order and other water quality control programs are expected to be less than significant. Effective non-structural controls are expected to be the most likely initial strategy for complying with Order, and because of their nature (i.e., plans, education and training, inspections, etc.), are not expected to have significant effects on the environment.

The Discharger will use structural controls to minimize or eliminate erosion and the transport of pollutants to the waters of the State, which may increase the likelihood of potential impacts to the environment that are cumulatively considerable. The construction of structural controls, along with other construction and maintenance projects, could have short-term cumulative effects. However, these effects are not cumulatively considerable in the long-term because the effects will cease with the completion of construction.

By complying with the requirements of this Order, any potential impacts on the environment will be less than significant.

c) **Less than Significant Impact**. Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of a size or scale that would cause substantial adverse effects on human beings, either directly or indirectly.

The Discharger's compliance with the Order is not expected to result in substantial adverse effects on human beings, and the implementation of management measures and BMPs required by the Order will improve environmental conditions, benefiting human beings, either directly or indirectly.

**B. DETERMINATION**

On the basis of this initial evaluation:

| | |
|---|---|
| ☐ | I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. |
| ☒ | I find that although the proposed project COULD have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. |
| ☐ | I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. |
| ☐ | I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. |
| ☐ | I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. |

Prepared By:

Mahsa Izadmehr Digitally signed by Mahsa Izadmehr
Date: 2025.10.14 13:46:50 -07'00'
Water Boards

Dr. Mahsa Izadmehr, Water Resource Control Engineer Date: October 8, 2025
California Regional Water Quality Control Board, San Diego Region
Water Sustainability and Protection Unit