

Attachment C – Environmental Findings and Statement of Overriding Considerations

CEQA FINDINGS

March 15, 2017

Certify that the environmental impact report (EIR) dated February 2017, on file with Planning & Development Services as Environmental Review Number PDS2015-ER-15-001 has been completed in compliance with the California Environmental Quality Act and the State CEQA Guidelines, that the EIR was presented to the Board of Supervisors and that the Board of Supervisors reviewed and considered the information contained therein before approving the project, and that the EIR reflects the independent judgment and analysis of the Board of Supervisors.

Adopt the findings concerning mitigation of significant environmental effects pursuant to CEQA Guidelines section 15091. (Attachment B)

Adopt the Statement of Overriding Considerations pursuant to State CEQA Guidelines section 15093. (Attachment B)

Adopt the Decision and Explanation Regarding Recirculation of the Final Environmental Impact Report pursuant to State CEQA Guidelines Section 15088.5(e). (Attachment B)

Adopt the Mitigation and Monitoring Program pursuant to CEQA Guidelines section 15091(d). (Attachment B)

STATEMENT OF OVERRIDING CONSIDERATIONS

AGRICULTURAL PROMOTION PROGRAM

POD 14-001; LOG No. 15-00-001

SCH# 2015061047

February 2017

The Findings required under the California Environmental Quality Act ("CEQA") (Public Resources Code sections 21000 *et seq.*) and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 *et seq.*) supporting the approval of the County of San Diego's (County) Agricultural Promotion Program POD 14-001 ("project") conclude that the County's approval of the project would result in significant impacts that cannot be substantially lessened or avoided. Because significant and unavoidable impacts remain after changes or alterations have been applied to the project, this Statement of Overriding Considerations has been prepared. This statement provides the County's views on whether the project's benefits outweigh its unavoidable adverse environmental effects. State CEQA Guidelines Section 15093 provides guidance on what a Statement of Overriding Considerations requires:

- a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- b) When the lead agency approves a project which would result in the occurrence of significant effects which are identified in the final environmental impact report but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final environmental impact report and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

The County has adopted Findings Regarding Significant Effects for the proposed project that identify certain significant effects of implementing the project that are unavoidable even after incorporation of all feasible mitigation measures. The County has adopted all feasible mitigation measures with respect to the significant unavoidable environmental impacts listed below. In addition, the County has analyzed a reasonable range of alternatives to the proposed project. Based on the analysis, the County has determined that the proposed project best meets the project objectives and is preferable to the alternatives analyzed. Based on the entire record, oral and written testimony, and other

evidence received at the public hearings on the project, the County finds that there is substantial evidence that the project will bring substantial benefits to the County, including economic, legal, social, technological, or other benefits that outweigh the significant effects on the environment that cannot be mitigated to a less-than-significant level. Therefore, the County is adopting the Agricultural Promotion Program despite the significant and unavoidable environmental impacts identified in the Final Environmental Impact Report (EIR) dated February 2017, and sets forth this Statement of Overriding Considerations as follows:

Significant Unavoidable Environmental Impacts

Final EIR Section Subject/Issue

2.1.3.2 and 2.1.4.2 – Violate Air Quality Standards (AQ-1, AQ-2 and AQ-6)
2.1.3.4 and 2.1.4.4 – Objectionable Odors (AQ-3 and AQ-7)
2.1.3.5 and 2.1.4.5 – Generate Substantial GHG Emissions (AQ-4 and AQ-8)
2.1.3.6 and 2.1.4.6 – Consistency with GHG Plans, Policies and Regulations (AQ-5 and AQ-9)

2.2.3.1 and 2.2.4.1 – Candidate, Sensitive, or Special-Status Species (BI-1 and BI-5)
2.2.3.2 and 2.2.4.2 – Riparian and Sensitive Natural Communities (BI-2 and BI-6)
2.2.3.3 and 2.2.4.3 – Federally Protected Wetlands (BI-3 and BI-7)
2.2.3.4 and 2.2.4.4 – Wildlife Movement (BI-4 and BI-8)

2.3.3.1 and 2.3.4.1 – Historic Resources (CR-1 and CR-6)
2.3.3.2 and 2.3.4.2 – Archaeological Resources (CR-2 and CR-7)
2.3.3.3 and 2.3.4.3 – Tribal Cultural Resources (CR-3 and CR-8)
2.3.3.4 and 2.3.4.4 – Paleontological Resources (CR-4 and CR-9)
2.3.3.5 and 2.3.4.5 – Human Remains (CR-5 and CR-10)

2.4.3.6 and 2.4.4.6 – Wildland Fires (HZ-1 and HZ-2)

2.5.3.1 and 2.5.4.1 – Surface Water Quality Standards (HY-1 and HY-3)
2.5.3.2 and 2.5.4.2 – Soil Erosion (HY-2 and HY-4)

2.6.3.1 and 2.6.4.1 – Vehicular Traffic Noise (N-1 and N-4)
2.6.3.3 and 2.6.4.3 – Permanent Increase in Ambient Noise Levels from Vehicular Traffic and Onsite Activities (N-2, N-3 and N-5)

2.7.3.1 and 2.7.4.1 – County Roadway and State Highway Segments from Buildout and Individual Accessory Uses (T-1, T-2 and T-3)

2.8.3.1 and 2.8.4.1 – Imported Water Supply (WS-1 and WS -3)
2.8.3.2 and 2.8.4.2 – Groundwater Supply (WS -2 and WS -4)

Each of the reasons for approval cited below is a separate and independent basis that supports approval of the project. Thus, even if a court were to set aside any particular

reason or reasons, the Board of Supervisors finds that it would stand by its determination that each reason, or any combinations of reasons, is a sufficient basis for approving the project notwithstanding the significant and unavoidable impacts that may occur. The substantial evidence supporting the various benefits can be found in the CEQA Findings Regarding Significant Effects, the Final EIR, and in the Record of Proceedings.

Statement of Overriding Considerations

The benefits of the proposed project include protecting and promoting agricultural uses in the County of San Diego, as well as regulatory, agricultural, and economic benefits. These benefits are specifically detailed below.

A. PROTECT AND PROMOTE AGRICULTURAL OPERATIONS

1. The proposed Zoning Ordinance Amendments would promote the development of uses that are accessory to agricultural uses, such as microbreweries (which by the definition in the Zoning Ordinance includes mead and cideries), distilleries, cheese-making and dairy operations, onsite food production, mobile butchering, packing and processing, onsite retail horticulture sales, animal raising, roadside sales of agricultural products, agricultural tourism, and agricultural homestays on agricultural lands consistent with the County's General Plan.

B. REGULATORY BENEFITS

1. The proposed project will clarify the operation of accessory uses related to agriculture by providing more detail on those accessory uses that will be allowed and under what circumstances they will be allowed. The proposed project will also streamline permitting by reducing the level of discretion needed for a permit and allowing certain accessory uses with only a ministerial Zoning Verification Permit. The proposed project will therefore benefit the County by making it easier for landowners to implement accessory agricultural uses.

C. AGRICULTURAL BENEFITS

1. According to the 2007 County Crop Statistics and Annual Report, agriculture occurs on approximately 308,000 acres within the County, primarily on small farms. Consistent with Board of Supervisor Policy I-133, the proposed project would support and encourage farming in the County. Specifically, the policy establishes the County's commitment to farming by finding ways to maintain agricultural land uses. As urbanization occurs throughout the County, farmers are encouraged to sell their land due to its potential value for urban development. The success of County agriculture is based on the retention of these small farms. Therefore, the proposed project will benefit the County by supporting agriculture in the form of

continued or newly operational agricultural accessory uses throughout the County.

D. ECONOMIC BENEFITS

1. Growth of a strong, viable agricultural industry has the potential to provide economic benefit through increased business and property taxes as the production, sale, and value of locally produced agricultural products increases. The proposed project would also introduce new regulations for agricultural microbreweries and micro-distilleries which would encourage production of high value crops such as hops, barley, and wheat. Therefore, the proposed project will benefit the County by allowing a higher return for agricultural landowners over the longer term through new employment opportunities and increased sales.
2. While the proposed project is not expected to directly generate a significant number of new agricultural jobs, some new job opportunities would be expected as production increases. In addition, growth of an agricultural region that includes microbreweries, cideries, wineries, and micro-distilleries could attract visitors from throughout the region and state. If this were to occur, visitor-serving businesses may be generated. Therefore, the proposed project could benefit the County through the encouragement of a tourist trade which could lead to greater employment.

Pursuant to State CEQA Guidelines Section 15093, the County has compared the economic, social, and regulatory benefits of the project as set forth above against the project's unavoidable environmental risks when determining whether to approve the project. The County finds that these considerable benefits of the project outweigh the unavoidable adverse effects, and that the "adverse environmental effects" of the project that cannot be mitigated to a level of environmental insignificance are deemed "acceptable."

Findings Regarding Significant Effects Pursuant To State CEQA Guidelines Section 15091

February 2017

**Agricultural Promotion Program
SCH No. 2015061047 | POD 14-001**

The following Findings are made for the County of San Diego Agricultural Promotion Program. The environmental effects of the Agricultural Promotion Program (hereinafter referred to as the "project") are addressed in the Final Environmental Impact Report (FEIR) dated February 2017, which is incorporated by reference herein.

The FEIR evaluated potentially significant effects for the following environmental areas of concern: 1) Air Quality; 2) Biological Resources; 3) Cultural Resources; 4) Hazards and Hazardous Materials; 5) Hydrology and Water Quality; 6) Noise; 7) Traffic; and 8) Water Supply and Groundwater. All of these environmental issue areas were concluded to result in significant and unavoidable impacts. A Statement of Overriding Considerations has been developed for the project pursuant to State CEQA Guidelines §15093.

The California Environmental Quality Act (CEQA) (Public Resources Code §21000 et. seq. and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et. seq.) require that no public agency shall approve or carry out a project which identifies one or more significant environmental effects of a project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effects on the environment;
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been or can or should be adopted by that other agency; or
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR (CEQA, §21081(a); Guidelines, §15091(a)).

For each significant effect identified for the project, Finding #3 above applies. These impacts are discussed under Section A below. The findings regarding alternatives are discussed in Section B below and provide rationale as to why the proposed project is preferred over the alternatives in the FEIR.

Section A - Finding (3)

Finding: Pursuant to Section 15091(a)(3) of the State CEQA Guidelines, the Board of Supervisors finds that, for each of the following significant effects and Project alternatives as identified in the FEIR, specific economic, legal, social, technological, or other considerations make mitigation measures or proposed project alternatives that would avoid significant impacts infeasible:

Chapter 2.1, Air Quality

AQ-1 Significant Effect - Air Quality Violations (Construction): The FEIR identifies the potential for simultaneous construction of multiple projects, which could result in significant impact due to an increase in NOx emissions above screening thresholds.

Facts in Support of Findings: The project would have the potential to result in a significant impact associated with violation of an air quality standard because emissions of criteria pollutants from the construction of the proposed project would exceed the screening-level thresholds for certain air pollutants. The simultaneous construction activities for the proposed project have the potential to increase emissions.

The mitigation measure identified in the FEIR would reduce the impact, but not to below a level of significance:

M-AQ-1: During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Grading can generate fugitive dust, including PM10 and PM2.5. Projects that involve site grading, excavation, or substantial material movement will implement the following dust control measures during construction, as applicable, in compliance with SDAPCD Rule 55.

- Water the grading areas a minimum of twice daily to minimize fugitive dust.
- Stabilize graded areas as quickly as possible to minimize fugitive dust.
- Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry.
- Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads.
- Remove any visible track-out into traveled public streets within 30 minutes of occurrence.
- Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred.
- Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads.
- Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling.
- Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph.
- Cover/water onsite stockpiles of excavated material.
- Enforce a 15 mph speed limit on unpaved surfaces.

- On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather.
- Hydroseed, landscape, or develop as quickly as possible all disturbed areas and as directed by the County and/or SDAPCD to reduce dust generation.
- Limit the daily grading volumes/area.

M-AQ-2: During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Construction projects typically require equipment such as bulldozers, graders, loaders, scrapers, backhoes, and heavy trucks. Project applicants will utilize clean-diesel, alternative fuel, or other engine controls to reduce equipment and vehicle exhaust emissions during construction. Project applicants will implement the following control measures, as applicable, to reduce equipment and exhaust related emissions.

- Require equipment to be maintained in good tune and to reduce excessive idling time.
- Utilize alternative fuels, such as compressed natural gas, renewable diesel, and diesel.
- Require the use of equipment that meets EPA Tier 4 or higher (as promulgated) emission standards.
- Require older equipment be retrofitted with advanced engine controls, such as diesel particulate filters, selective catalytic reduction (SCR), or cooled exhaust gas recirculation.

Additional Strategies for Microbreweries

Prepare and implement an energy management system (EMS) to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-16 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Additional Strategies for Wineries, and Dairies

Prepare and implement an EMS to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-17 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Additional Strategies for Dairies

Prepare and implement an EMS to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-18 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Because the application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with air quality violations would remain significant and unavoidable.

AQ-2 Significant Effect - Air Quality Violations (Operation): The FEIR identifies the potential for multiple projects to operate simultaneously, there could be significant impact related to a violation of air quality standards exceeding screening thresholds.

Facts in Support of Findings: The project would have the potential to result in a significant impact associated with violation of an air quality standard because emissions of criteria pollutants from the operation of the proposed project would exceed the screening-level thresholds for certain air pollutants. The simultaneous operation activities for the proposed project have the potential to increase emissions.

The mitigation measure identified in the FEIR would reduce the impact, but not to below a level of significance:

M-AQ-3: During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Building construction may result in off-gassing of ROG from architectural coatings and paints that exceed the County's threshold. Project applicants will reduce ROG emissions related to architectural coatings through the use of low Volatile Organic Compound (VOC) coatings (VOC content less than or equal to 50 grams per liter).

M-AQ-4: During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Project applicants will implement the following control measures, as applicable, to reduce operational related criteria pollutant and GHG emissions.

- General Strategies
- Increase energy efficiency by at least 10 percent beyond the Title 24 standard in place at the time of construction, unless demonstrated to be infeasible.
- Utilize low VOC coatings (VOC content less than or equal to 50 grams per liter) for periodic painting and facility upkeep.
- Plant shade trees within 40 feet of the south side or within 60 feet of the west side of properties.
- Utilize cool roof materials (albedo greater than or equal to 30) or install green roofs.
- Install solar water heaters.
- Maximize interior day light and utilize high efficiency lighting.
- Increase roof/ceiling insulation beyond the American Society of Heating, Refrigeration and Air Conditioning Engineers Standard 90.1-2010.
- Install low-water use appliances and fixtures to reduce indoor water consumption by a minimum of 10 percent relative to the 2008 Plumbing Code baseline.
- Design and install a backbone recycled water system to supply to landscaped spaces.
- Install weather-based irrigation controllers to reduce outdoor water consumption.
- Compost food waste and other forms of organic waste, as feasible.

- Provide easily accessible and well-maintained recycling bins for visitor use.
- Provide shuttles for visitors and employees from the nearest town.
- Incorporate onsite renewable energy production, including installation of photovoltaic cells or other options.

Additional Strategies for Microbreweries

Prepare and implement an energy management system (EMS) to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-16 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Additional Strategies for Wineries, and Dairies

Prepare and implement an EMS to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-17 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Additional Strategies for Dairies

Prepare and implement an EMS to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-18 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Because the application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with air quality violations would remain significant and unavoidable.

AQ-3 Significant Effect - Objectionable Odors: The FEIR identifies significant impacts related to the promotion and encouragement of additional agricultural uses within the County, there is a high potential to generate nuisance odors. Therefore, there could be a significant impact related to objectionable odors.

Facts in Support of Findings: Under the proposed project, odors associated with the promotion and encouragement of additional agricultural uses within the County would result in a significant impact.

The mitigation measure identified in the FEIR would reduce the impact, but not to below a level of significance:

M-AQ-5: During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality shall be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Creameries/ dairies and animal raising may generate odors from animal waste. Microbreweries and wineries may also result in temporary odors during fermenter venting. Project applicants will implement best management practices to control odors.

Animal-Related Operations

- Animal stalls will be cleaned at least once per day including the removal of animal waste and soiled bedding.
- Animal waste will be stockpiled in an enclosed, covered containment vessel to ensure anaerobic off-gassing and associated odor generation is minimized. The containment vessel will protect animal waste stockpiles from heavy weather conditions, including wind and rain which may cause siltation and accelerate anaerobic decomposition of the waste.
- If a project site is located within 1 mile of residents and/or sensitive receptors, containment vessels storing animal waste will be located at the furthest feasible distance from nearby residents and/or sensitive receptors.

Microbreweries and Wineries

If a project site is located within 1 mile of residents and/or sensitive receptors, chemical neutralizers (e.g., chlorination, hydrogen peroxide) will be used to control odors associated with malting and fermentation.

Because the application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with objectionable odors would remain significant and unavoidable.

AQ-4 Significant Effect - Greenhouse Gas Emissions: The FEIR identifies significant impacts related to the cumulative increase of greenhouse gas emissions as a result of homestay, roadside sales and agricultural stores.

Facts in Support of Findings: The potential full buildout of microbreweries, wineries, and creameries/dairies under the proposed project could result in a significant impact due to the cumulative increase of greenhouse gas emissions as a result of homestay, roadside sales and agricultural stores.

The mitigation measure identified in the FEIR would reduce the impact, but not to below a level of significance:

M-AQ-4: During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Project applicants will implement the following control measures, as applicable, to reduce operational related criteria pollutant and GHG emissions.

- General Strategies
- Increase energy efficiency by at least 10 percent beyond the Title 24 standard in place at the time of construction, unless demonstrated to be infeasible.
- Utilize low VOC coatings (VOC content less than or equal to 50 grams per liter) for periodic painting and facility upkeep.
- Plant shade trees within 40 feet of the south side or within 60 feet of the west side of properties.
- Utilize cool roof materials (albedo greater than or equal to 30) or install green roofs.

- Install solar water heaters.
- Maximize interior day light and utilize high efficiency lighting.
- Increase roof/ceiling insulation beyond the American Society of Heating, Refrigeration and Air Conditioning Engineers Standard 90.1-2010.
- Install low-water use appliances and fixtures to reduce indoor water consumption by a minimum of 10 percent relative to the 2008 Plumbing Code baseline.
- Design and install a backbone recycled water system to supply to landscaped spaces.
- Install weather-based irrigation controllers to reduce outdoor water consumption.
- Compost food waste and other forms of organic waste, as feasible.
- Provide easily accessible and well-maintained recycling bins for visitor use.
- Provide shuttles for visitors and employees from the nearest town.
- Incorporate onsite renewable energy production, including installation of photovoltaic cells or other options.

Additional Strategies for Microbreweries

Prepare and implement an energy management system (EMS) to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-16 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Additional Strategies for Wineries, and Dairies

Prepare and implement an EMS to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-17 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Additional Strategies for Dairies

Prepare and implement an EMS to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-18 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Because the application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with GHG emissions would remain significant and unavoidable.

AQ-5 Significant Effect - Consistency with GHG Applicable Plans, Policies, and Regulations:

The FEIR identifies the potential for the proposed project to result in a significant impact related to conflicts with an applicable GHG plan, policy, or regulation.

Facts in Support of Findings: Simultaneous construction and operation of agricultural uses under the proposed project could result in a significant impact related to conflicts with an applicable GHG plan, policy, or regulation.

The mitigation measure identified in the FEIR would reduce the impact, but not to below a level of significance:

M-AQ-4: During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Project applicants will implement the following control measures, as applicable, to reduce operational related criteria pollutant and GHG emissions.

- General Strategies
- Increase energy efficiency by at least 10 percent beyond the Title 24 standard in place at the time of construction, unless demonstrated to be infeasible.
- Utilize low VOC coatings (VOC content less than or equal to 50 grams per liter) for periodic painting and facility upkeep.
- Plant shade trees within 40 feet of the south side or within 60 feet of the west side of properties.
- Utilize cool roof materials (albedo greater than or equal to 30) or install green roofs.
- Install solar water heaters.
- Maximize interior day light and utilize high efficiency lighting.
- Increase roof/ceiling insulation beyond the American Society of Heating, Refrigeration and Air Conditioning Engineers Standard 90.1-2010.
- Install low-water use appliances and fixtures to reduce indoor water consumption by a minimum of 10 percent relative to the 2008 Plumbing Code baseline.
- Design and install a backbone recycled water system to supply to landscaped spaces.
- Install weather-based irrigation controllers to reduce outdoor water consumption.
- Compost food waste and other forms of organic waste, as feasible.
- Provide easily accessible and well-maintained recycling bins for visitor use.
- Provide shuttles for visitors and employees from the nearest town.
- Incorporate onsite renewable energy production, including installation of photovoltaic cells or other options.

Additional Strategies for Microbreweries

Prepare and implement an energy management system (EMS) to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-16 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Additional Strategies for Wineries, and Dairies

Prepare and implement an EMS to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-17 lists potential measures that may be incorporated into

the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Additional Strategies for Dairies

Prepare and implement an EMS to improve process- and facility energy-efficiency and reduce overall energy consumption. Table 2.1-18 lists potential measures that may be incorporated into the EMS. Please refer to the General Strategies section for potential measures to reduce water consumption and waste generation.

Because the application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with GHG emissions would remain significant and unavoidable.

AQ-6 Cumulatively Considerable Impact - Air Quality Standards: As described above, the implementation of the proposed project would have the potential to result in a cumulatively significant impact on air quality standards due to an increase of criteria pollutants if emissions exceed the County's thresholds during construction or long-term operation. In combination with other cumulative projects, the project would have the potential to result in cumulatively considerable impacts.

Facts in Support of Findings: Cumulative projects located in the San Diego region would have the potential to result in a significant cumulative air quality violation if, in combination, they would violate any air quality standard or contribute to an existing or projected air quality violation. New stationary sources of criteria pollutants or projects that would increase vehicle trips may result in increases in pollutant emissions. There are projects proposed in the SDAB that could result in the emission of criteria pollutants due to increased vehicle trips. As such, cumulative projects in the region would have the potential to result in cumulatively considerable impacts relative to air quality violations.

As described above for Impact AQ-1, the concurrent construction activities for proposed project have the potential to increase emissions. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact related to air quality violations.

As described above for Impact AQ-1, none of the mitigation measures or project alternatives would reduce impacts relative to air quality violations to below significant. Therefore, project impacts associated with air quality violations due to the implementation of the proposed project would remain cumulatively considerable.

AQ-7 Cumulatively Considerable Impact - Objectionable Odors: As described above, the implementation of the proposed project would have the potential to result in significant impacts associated with odors. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Findings: Cumulative projects located in the San Diego region would have the potential to result in a significant cumulative impact associated with odors if, in combination, they would result in a net increase of odors. The project would result in a potentially significant direct impact associated with odors. Therefore, the cumulative projects in the region would have the potential to result in cumulatively considerable impacts relative to odors.

As described above for Impact AQ-3, odors from agricultural accessory uses have the potential to increase odors. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact related to odors.

As described above for Impact AQ-3, none of the mitigation measures or project alternatives would reduce impacts relative to odors to below significant. Therefore, project impacts associated with odors due to the development of accessory agricultural facilities would remain cumulatively considerable.

AQ-8 Cumulatively Considerable Impact - Greenhouse Gas Emissions: As described above, the implementation of the proposed project would have the potential to result in a cumulatively significant impact on GHG emissions due to the potential concurrent construction and operation of agricultural uses promoted by the project.

Facts in Support of Findings: No single emitter of GHGs is large enough to trigger global climate change on its own. Rather, climate change is the result of the individual contributions of countless past, present, and future sources. Therefore, GHG impacts are inherently cumulative and the proposed project would have the potential to result in cumulatively considerable impacts relative to GHG emissions.

As described above for Impact AQ-4, concurrent construction and operation of agricultural uses promoted by the project would result in an exceedance of GHG emissions. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact related to GHG emissions.

As described above for Impact AQ-4, none of the mitigation measures or project alternatives would reduce impacts relative to GHG emissions to below significant. Therefore, impacts associated with GHG emissions due to the implementation of the proposed project would remain cumulatively considerable.

AQ-9 Cumulatively Considerable Impact - Consistency with GHG Applicable Plans, Policies, and Regulations: As described above, the implementation of the proposed project would have the potential to result in a cumulatively significant impact on GHG emissions due to the potential concurrent construction and operation of agricultural uses promoted by the project.

Facts in Support of Findings: There is no framework for achieving long-term reduction targets (2050), it is unknown exactly how the state plans on achieving these targets and to what extent action is required at the local and project level in order to achieve these targets. Therefore, the proposed project would have the potential to result in cumulatively considerable impacts relative to consistency with applicable GHG plans, policies or regulations.

As described above for Impact AQ-5, Simultaneous construction and operation of agricultural uses under the proposed project would potentially contribute to a cumulatively considerable impact related to conflicts with an applicable GHG plan, policy, or regulations.

As described above for Impact AQ-5, none of the mitigation measures or project alternatives would reduce impacts relative to consistency with applicable GHG plans, policies or regulations to below significant. Therefore, project impacts related to conflicts with an applicable GHG plan, policy, or regulations due to the implementation of the proposed project would remain cumulatively considerable.

Chapter 2.2, Biological Resources Impacts

BI-1 Significant Effect - Candidate, Sensitive, or Special Status Species: The FEIR identifies significant impacts, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS.

Facts in Support of Finding: The project would have the potential to result in direct and/or indirect impacts to candidate, sensitive, or special status plant and wildlife species and their habitat from the development of accessory agricultural facilities under this project through excavation and grading activities or construction of tall obstructions that could affect species.

The mitigation measure identified in the FEIR would reduce the impact, but not to below a level of significance:

M-BIO-1: During the environmental review process for future discretionary permits for accessory agricultural uses, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated pursuant to CEQA and RPO, BMO, and HLP Ordinance requirements, as applicable. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.

The following measure that would reduce impacts to candidate, sensitive, and special status species to below significant was also considered. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- Adopt MSCP Plans for North County and East County that provide coverage for special-status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions. Because the County is currently in the process of preparing such plans, this measure is feasible and attainable. However, these conservation plans require approval at the federal and state levels, which the County cannot guarantee would occur prior to approval and implementation of the proposed project. In addition, the timing of these programs (e.g., MSCP adoption and implementation) may not coincide with the proposed project impacts in these areas. Therefore, this measure cannot be considered feasible mitigation for the proposed project.

Because some of the measures listed above would be infeasible; because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to candidate, sensitive, and special status species would remain significant and unavoidable.

BI-2 Significant Effect - Riparian Habitat and Other Sensitive Natural Communities: The FEIR identifies significant impacts on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFG or USFWS.

Facts in Support of Finding: The project would have the potential to result in direct and/or indirect loss of riparian habitat and other sensitive natural communities by the removal or destruction of such habitat related to the disturbance and increased visitor and employee activity on

agricultural properties. Future small, accessory agricultural uses would not be subject to discretionary review, and they may be located in areas that would impact a riparian habitat or sensitive natural community. These future facilities may require ground disturbance that would not be subject to environmental review and, therefore, could adversely affect sensitive vegetation communities.

The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-BIO-1: During the environmental review process for future discretionary permits for accessory agricultural uses, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated pursuant to CEQA and RPO, BMO, and HLP Ordinance requirements, as applicable. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.

M-BIO-2: Require that development projects obtain CWA Section 401/404 permits issued by the California RWQCB and USACE for applicable discretionary project-related disturbances of waters of the U.S. and/or associated wetlands. Also continue to require that discretionary projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from CDFW for applicable project-related disturbances of streambeds.

The following measure that would reduce impacts to riparian habitat or other sensitive natural communities to below significant was also considered. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- Adopt MSCP Plans for North County and East County that provide coverage for special-status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions. Because the County is currently in the process of preparing such plans, this measure is feasible and attainable. However, these conservation plans require approval at the federal and state levels, which the County cannot guarantee would occur prior to approval and implementation of the proposed project. In addition, the timing of these programs (e.g., MSCP adoption and implementation) may not coincide with the proposed project impacts in these areas. Therefore, this measure cannot be considered feasible mitigation for the proposed project.

Because the mitigation measures noted above would be infeasible; because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to riparian habitat or other sensitive natural communities would remain significant and unavoidable.

BI-3 Significant Effect - Federally Protected Wetlands: The FEIR identifies significant impacts related to the implementation of the proposed project. There could be a significant impacts due to ground disturbance activities on agricultural properties as well as non-permitted site disturbance activities such as parking and seating areas for visitors, and, as a result, the proposed project could violate federal regulations related to wetlands.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to federally protected wetlands.

The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-BIO-1: During the environmental review process for future discretionary permits for accessory agricultural uses, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated pursuant to CEQA and RPO, BMO, and HLP Ordinance requirements, as applicable. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.

M-BIO-2: Require that development projects obtain CWA Section 401/404 permits issued by the California RWQCB and USACE for applicable discretionary project-related disturbances of waters of the U.S. and/or associated wetlands. Also continue to require that discretionary projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from CDFW for applicable project-related disturbances of streambeds.

The following measure that would reduce impacts to federally protected wetlands to below significant was also considered. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- Adopt MSCP Plans for North County and East County that provide coverage for special-status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions. Because the County is currently in the process of preparing such plans, this measure is feasible and attainable. However, these conservation plans require approval at the federal and state levels, which the County cannot guarantee would occur prior to approval and implementation of the proposed project. In addition, the timing of these programs (e.g., MSCP adoption and implementation) may not coincide with the proposed project impacts in these areas. Therefore, this measure cannot be considered feasible mitigation for the proposed project.

Because the mitigation measures noted above would be infeasible; because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to federally protected wetlands would remain significant and unavoidable.

BI-4 Significant Effect - Wildlife Movement: The FEIR identifies significant impacts related to the implementation of the proposed project, there could be a significant impact due to the development of permanent structures and the expansion of activities on agricultural properties that have the potential to interfere with wildlife movement or impede the use of native wildlife nursery sites if disturbance or new development is sited within or adjacent to an area that supports this use.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to wildlife movement.

The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-BIO-1: During the environmental review process for future discretionary permits for accessory agricultural uses, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated pursuant to CEQA and RPO, BMO, and HLP Ordinance requirements, as applicable. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.

M-BIO-2: Require that development projects obtain CWA Section 401/404 permits issued by the California RWQCB and USACE for applicable discretionary project-related disturbances of waters of the U.S. and/or associated wetlands. Also continue to require that discretionary projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from CDFW for applicable project-related disturbances of streambeds.

The following measure that would reduce impacts related to wildlife movement to below significant was also considered. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- Adopt MSCP Plans for North County and East County that provide coverage for special-status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions. Because the County is currently in the process of preparing such plans, this measure is feasible and attainable. However, these conservation plans require approval at the federal and state levels, which the County cannot guarantee would occur prior to approval and implementation of the proposed project. In addition, the timing of these programs (e.g., MSCP adoption and implementation) may not coincide with the proposed project impacts in these areas. Therefore, this measure cannot be considered feasible mitigation for the proposed project.

Because the mitigation measures noted above would be infeasible, because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts related to wildlife movement would remain significant and unavoidable.

BI-5 Cumulatively Considerable Effect - Candidate, Sensitive, or Special Status Species: As described above, the development of accessory agricultural facilities under the proposed project would have the potential to result in significant impacts on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Findings: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS. Applicable federal and/or State regulations provide protections for species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS. However, without a comprehensive NCCP in place for the long-term protection of species, a cumulative loss of species would occur, even after mitigation has been implemented for individual projects. Therefore, projects in the region would have the potential to result in cumulatively

considerable impacts to species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS.

As described for Impact BI-1, accessory agricultural facilities would have the potential to result in impacts to candidate, sensitive or special-status species. The proposed project may allow ground disturbance and vertical obstructions which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact to species.

As described for Impact BI-1, **M-BIO-1** would reduce the project's direct and cumulative impact but not below a level of significance. In addition, none of the project alternatives would reduce the project's significant impacts associated with the candidate, sensitive or special-status species to below significant. Therefore, potential impacts related to candidate, sensitive or special-status species due to the development of accessory agricultural facilities would remain cumulatively considerable.

BI-6 Cumulatively Considerable Effect - Riparian Habitat and Other Sensitive Natural Communities: As described above, disturbance and increased visitor and employee activity on agricultural properties under the proposed project would have the potential to result in significant impacts to a riparian habitat or another sensitive natural community. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Findings: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with riparian habitat. Applicable federal and/or State regulations provide protections for some habitat.

However, without a comprehensive NCCP in place for the long-term protection of riparian habitat or sensitive natural communities, a cumulative loss of habitat would occur, even after mitigation has been implemented for individual projects. Therefore, projects in the region would have the potential to result in cumulatively considerable impacts to riparian habitat or sensitive natural community.

As described for Impact BI-2, disturbance and increased visitor and employee activity on agricultural properties would have the potential to result in impacts to riparian habitat. The proposed project may allow ground disturbance which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact to riparian habitat or sensitive natural community.

As described for Impact BI-2, **M-BIO-1** and **M-BIO-2** would reduce the project's direct and cumulative impact but not below a level of significance. In addition, none of the project alternatives would reduce the project's significant impacts associated with riparian habitat or sensitive natural community to below significant. Therefore, impacts to riparian habitat or sensitive natural community from the development of accessory agricultural facilities would remain cumulatively considerable.

BI-7 Cumulatively Considerable Effect - Federally Protected Wetlands: As described above, implementation of the proposed project would have the potential to result in impacts to federally protected wetlands. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact to federally protected wetlands.

Facts in Support of Findings: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with federally protected wetlands. Applicable federal regulations provide protections for some wetlands. However, existing County regulations would not ensure that a significant cumulative impact associated with federally protected wetlands would not occur. Therefore, a significant cumulative impact associated with federally protected wetlands would occur.

As described for Impact BI-3, implementation of the proposed project would have the potential to result in an impact to federally protected wetlands. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact related to federally protected wetlands.

As described for Impact BI-3, **M-BIO-1** and **M-BIO-2** would reduce the project's direct and cumulative impact but not below a level of significance. In addition none of the project alternatives would reduce the project's significant impacts associated with federally protected wetlands to below significant. Therefore, potential impacts related to federally protected wetlands due to land clearing activities would remain cumulatively considerable.

BI-8 Cumulatively Considerable Effect - Wildlife Movement: As described above, implementation of the proposed project would have the potential to result in impacts to wildlife movement. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact on wildlife movement.

Facts in Support of Findings: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with wildlife movement. Applicable federal and/or State regulations provide protections for some wildlife movement. However, without a comprehensive NCCP in place for the long-term protection of wildlife movement corridors and nursery sites for the entire Southern California region, a cumulative loss of wildlife movement corridors and nursery sites would occur, even after mitigation has been implemented for individual projects. Therefore, a significant cumulative impact associated with wildlife movement corridors and nursery sites would occur.

As described for Impact BI-4, implementation of the proposed project would have the potential to result in an impact to wildlife movement due to the development of permanent structures and the expansion of activities on agricultural properties that have the potential to interfere with wildlife movement or impede the use of native wildlife nursery sites if disturbance or new development is sited within or adjacent to an area that supports this use. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact related to wildlife movement.

As described for Impact BI-4, **M-BIO-1** and **M-BIO-2** would reduce the project's direct and cumulative impact but not below a level of significance. In addition none of the project alternatives would reduce the project's significant impacts associated with wildlife movement to below significant. Therefore, potential impacts to wildlife movement due to the development of permanent structures and the expansion of activities on agricultural properties that have the potential to interfere with wildlife movement or impede the use of native wildlife nursery sites if disturbance or new development is sited within or adjacent to an area that supports this use would remain cumulatively considerable.

Chapter 2.3, Cultural Resources Impacts

CR-1 Significant Effect - Historic Resources: The FEIR identifies significant impacts to historical resources as defined in Section 15064.5 of the state CEQA Guidelines or the County's Resource Protection Ordinance associated with the development of accessory uses on agricultural lands under the proposed project.

Facts in Support of Findings: Impacts to historical resources would occur if development resulted in physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. Both direct and indirect impacts to historical resources may result from the development of accessories under the project. The proposed project may result in a potentially significant adverse impact to a historical resource since it could potentially result in the physical demolition, destruction, or alteration of the historical resource through ground disturbance, or it could alter the setting of the resource when the setting contributes to the resource's significance through introducing new development for agricultural accessory uses.

The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-CR-1: The County will provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. This will be done by reaching out to property owners with identified historic resources to participate. Known historic resources will also be designated as such by the County and subject to review by the Historic Site Board to ensure that significant impacts are avoided.

The following measure that would reduce impacts to historic resources to below significant was also considered. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- Identify all potential historic structures and resources within the County and enter the information in the Department of Planning and Development Services property database, then monitor permits issued for all documented properties. This mitigation measure would be infeasible because the County does not have access to all of the potential archaeological sites or the legal right to survey all potential historic sites in the unincorporated areas.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with historic resources would remain significant and unavoidable.

CR-2 Significant Effect - Archaeological Resources: The FEIR identifies significant impacts to archaeological resources from potential ground-disturbing activities associated with the ground disturbance and increased visitor and employee activity on agricultural properties under the proposed project.

Facts in Support of Findings: Impacts to archaeological resources would occur if development resulted in a substantial adverse change in the significance of an archaeological resource as defined by Public Resources Code Section 21083.2 and State CEQA Guidelines Section 15064.5(a). Indirect impacts may also occur from land use development activities that increase erosion, fugitive dust, or the accessibility of a surface or subsurface resource. Both direct and indirect impacts to

archeological resources may result from ground disturbance and increased visitor and employee activity on agricultural properties under the project. The proposed project may result in a potentially significant adverse impact to an archaeological resource since it could potentially result in ground disturbance activities, which have the potential to damage or destroy archaeological resources that may be present on or below the ground surface.

The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-CR-2: During the environmental review process for future Administrative, Minor Use, and Major Use Permits for agricultural accessory uses, proposed projects under the Agriculture Promotion Project will complete a full records search with the South Coastal Information Center. The result of the search will be used by a qualified archaeologist to provide a recommendation regarding potential cultural resources, methods for avoidance, and appropriate mitigation should impacts be anticipated. Consultations with Tribes will be conducted as appropriate pursuant to Senate Bill 18 and AB 52 to identify resources and implement feasible mitigation if impacts would occur.

The following measures that would reduce impacts to archaeological resources to below significant were also considered. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- Identify archaeological resources within the County and enter the information in the Department of Planning and Development Services property database, then monitor permits issued for all documented properties. This mitigation measure would be infeasible because the County does not have access to all of the potential archaeological sites or the legal right to survey all potential sites in the unincorporated areas.
- Require an archaeological resource survey for all accessory agricultural uses to ensure that impacts on archaeological resources will be avoided or mitigated. This measure is not feasible as it would directly conflict with the project objectives to streamline the permitting process for accessory agricultural uses in order to better facilitate the development of such uses within the County.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with archaeological resources would remain significant and unavoidable.

CR-3 Significant Effect - Tribal Cultural Resources: The FEIR identifies significant impacts related to the implementation of the proposed project, there could be a significant impact due to ground disturbance and landscape alteration which has the potential to damage or destroy tribal cultural resources that may be present.

Facts in Support of Findings: Impacts to tribal cultural resources would occur if development resulted in a substantial adverse change in the significance of a tribal cultural resource as defined by Public Resources Code Section 21074, 5020.1(k) or 5024.1(c). Increases in building and parking areas, driveways, fences, or outdoor seating could occur associated with agricultural homestays, agricultural microbreweries, cideries, and micro-distilleries, agricultural and horticultural retail uses, agricultural tourism, animal raising, aquaponics, creamery/dairy, mobile butchering, and wineries, which could potentially affect tribal cultural resources under the proposed project. The

proposed project may result in a potentially significant adverse impact to a tribal cultural resource since it could potentially result in ground disturbance activities, which have the potential to damage or destroy tribal cultural resources that may be present on or below the ground surface.

The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-CR-3: The County will proactively work with the Tribes to identify tribal cultural resources and areas that require Tribal notification pursuant to AB 52.

The following measures that would reduce impacts to tribal cultural resources to below significant were also considered. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- Identify tribal cultural resources within the County and enter the information in the Department of Planning and Development Services property database, then monitor permits issued for all documented properties. This mitigation measure would be infeasible because the County is reliant upon the Tribes to identify tribal cultural resources. To the extent that that information is provided, the County can keep a record of it.
- Require tribal coordination for all accessory agricultural uses to ensure that impacts on tribal cultural resources will be avoided or mitigated. This measure is not feasible as it would directly conflict with the project objectives to streamline the permitting process for accessory agricultural uses in order to better facilitate the development of such uses within the County.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with tribal cultural resources would remain significant and unavoidable.

CR-4 Significant Effect - Paleontological Resources: The FEIR identifies significant impacts to paleontological resources from potential ground-disturbing activities associated with the potential for ground disturbance to occur without review for potential impacts per local or regional plans, policies, or regulations under the proposed project.

Facts in Support of Findings: Paleontological resources are found in sedimentary strata of the County, which primarily underlies the coastal plain, the desert and some mountain valleys. Impacts to paleontological resources would occur if development activities directly or indirectly destroy a unique paleontological resource or site. Such impacts usually result from the physical destruction of fossil remains by excavation operations that cut into geologic formations. The proposed project may result in a potentially significant adverse impact to a paleontological resource since it could result in ground disturbing activities, which have the potential to damage or destroy fossils in the underlying rock units.

The following measure was considered to reduce impacts to paleontological resources to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- Require a survey or grading monitor to identify potential paleontological resources on site for all accessory agricultural uses to ensure that impacts on paleontological resources will be avoided or mitigated. This measure is not feasible as it would directly conflict with the project

objectives to streamline the permitting process for accessory agricultural uses in order to better facilitate the development of such uses within the County.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with paleontological resources would remain significant and unavoidable.

CR-5 Significant Effect - Human Remains: The FEIR identifies significant impacts to human remains from potential ground-disturbing activities associated with the development of accessory agricultural facilities under the proposed project.

Facts in Support of Findings: Archaeological investigations within the unincorporated County have identified human remains from prior human occupations, which are important cultural resources. The disturbance of human remains, Native American or otherwise, including those interred outside of formal cemeteries, is considered a significant impact. Impacts to human remains may result from the development of accessory agricultural facilities under the project. The proposed project may result in a potentially significant adverse impact to human remains since it could potentially result in ground disturbing activities, which have the potential to damage or destroy human remains.

The following measure was considered to reduce impacts to human remains to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- Require a survey to identify potential human remains on site for all accessory agricultural uses to ensure that impacts on human remains will be avoided or mitigated. This measure is not feasible as it would directly conflict with the project objectives to streamline the permitting process for accessory agricultural uses in order to better facilitate the development of such uses within the County.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with human remains would remain significant and unavoidable.

CR-6 Cumulatively Considerable Effect - Historic Resources: As described above, the development of accessory agricultural facilities under the proposed project would have the potential to result in significant impacts to historic resources. Therefore, in combination with other past, present and foreseeable future projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Findings: Cumulatively, projects located in the San Diego region would have the potential to result in a cumulative impact associated with the loss of historical resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. Cumulative projects that would have the potential to result in adverse impacts to historical resources from development activities include development allowed by the General Plan Update and the development of land uses as designated under surrounding jurisdictions' general plans. These projects are regulated by and would be required to comply with applicable federal, state, and local regulations, including Public Resources Code, Section 5097; Penal Code, Section 6221/2; the Mills Act; Health and Safety Code, Section 18950-18961; and the Secretary of the Interior's Standards for

Rehabilitation and Standards for the Treatment of Historic Properties. However, even with regulations in place, individual historical resources would still have the potential to be impacted or degraded from demolition, destruction, alteration, or structural relocation as a result of new private or public development or redevelopment allowable under cumulative projects. Therefore, projects in the region would have the potential to result in cumulatively considerable impacts to historic resources.

As described above for Impact CR-1, the development of accessory uses on agricultural lands under the proposed project would have the potential to result in impacts to historic resources. The proposed project may allow ground disturbance which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact to historic resources.

As described above for Impact CR-1, none of the mitigation measures or project alternatives would reduce significant impacts associated with historic resources to below significant. Therefore, impacts to historic resources from the development of accessory uses on agricultural lands under the proposed project and would remain cumulatively considerable.

CR-7 Cumulatively Considerable Effect- Archaeological Resources: As described above, the development of accessory uses on agricultural properties under the proposed project would have the potential to result in significant impacts to archeological resources. Therefore, in combination with other past, present and foreseeable future projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulatively, projects located in the San Diego region would have the potential to result in a cumulative impact associated with the loss of archeological resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. Cumulative projects that would have the potential to result in adverse impacts to archaeological resources from development activities include development allowed by the General Plan Update and the development of land uses as designated under surrounding jurisdictions' general plans. These projects are regulated by and would be required to comply with applicable federal, state, and local regulations, including Public Resources Code, Section 5097; Penal Code, Section 6221/2; the Mills Act; Health and Safety Code, Sections 18950-18961; and the Secretary of the Interior's Standards for Rehabilitation and Standards for the Treatment of Historic Properties. However, the loss of archaeological resources on a regional level may not be adequately mitigable through the data recovery and collection methods specified in these regulations, as their value may also lie in cultural mores and religious beliefs of applicable groups. Therefore, projects in the region would have the potential to result in cumulatively considerable impacts to archeological resources.

As described above for Impact CR-2, future development of accessory agricultural facilities would have the potential to result in impacts to archeological resources. The proposed project may allow ground disturbance which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact to archeological resources.

As described above for Impact CR-2, none of the mitigation measures or project alternatives would reduce significant impacts associated with archeological resources to below significant. Therefore, impacts to archeological resources from future development of accessory agricultural facilities would remain cumulatively considerable.

CR-8 Cumulatively Considerable Effect - Tribal Cultural Resources: As described above, the development of accessory agricultural facilities under the proposed project would have the potential to result in significant impacts that would potentially impact tribal cultural resources. Therefore, in combination with other past, present and foreseeable future projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with tribal cultural resources due to grading, excavation or other ground-disturbing activities. Cumulative projects that would have the potential to result in adverse impacts to tribal cultural resources from development activities include development allowed by the General Plan Update and the development of land uses as designated under surrounding jurisdictions' general plans. These projects are regulated by and would be required to comply with applicable federal, state, and local regulations, including AB 52. However, the loss of tribal cultural resources on a regional level may not be adequately mitigable through the data recovery and collection methods specified in these regulations, as their value may also lie in cultural mores and religious beliefs of applicable groups. Therefore, projects in the region would have the potential to result in cumulatively considerable impacts to tribal cultural resources.

As described above for Impact CR-3, future development of accessory agricultural facilities would have the potential to result in impacts to tribal cultural resources. The proposed project may allow ground disturbance and land alteration which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact to tribal cultural resources.

As described above for Impact CR-3, none of the mitigation measures or project alternatives would reduce significant impacts associated with tribal cultural resources to below significant. Therefore, impacts to tribal cultural resources from future development of accessory agricultural facilities would remain cumulatively considerable.

CR-9 Cumulatively Considerable Effect - Paleontological Resource: As described above, the development of accessory agricultural facilities under the proposed project would have the potential to result in significant impacts that would potentially impact paleontological resources. Therefore, in combination with other past, present and foreseeable future projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with paleontological resources due to grading, excavation or other ground-disturbing activities. Cumulative projects that would have the potential to result in adverse impacts to paleontological resources from development activities include development allowed by the General Plan Update and the development of land uses as designated under surrounding jurisdictions' general plans. Cumulative projects on state or public lands would be required to comply with Public Resources Code, Sections 5097-5097.6, pertaining to impacts to paleontological resources. However, the loss of paleontological resources on a regional level may not be adequately mitigable through methods specified in these regulations. Therefore, projects in the region would have the potential to result in cumulatively considerable impacts to paleontological resources.

As described above for Impact CR-4, future development of accessory agricultural facilities would have the potential to result in impacts to paleontological resources. The proposed project may allow

ground disturbance which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact to paleontological resources.

As described above for Impact CR-4, there are no feasible mitigation measures and no project alternatives that would reduce significant impacts associated with paleontological resources to below significant. Therefore, impacts to paleontological resources from future development of accessory agricultural facilities would remain cumulatively considerable.

CR-10 Cumulatively Considerable Effect - Human Remains: As described above, the development of accessory agricultural facilities under the proposed project would have the potential to result in significant impacts to human remains. Therefore, in combination with other past, present and foreseeable future projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with human remains due to grading, excavation or other ground-disturbing activities. Cumulative projects that would have the potential to result in adverse impacts to human remains from development activities include development allowed by the General Plan Update and the development of land uses as designated under surrounding jurisdictions' general plans. Cumulative projects would be required to comply with the Native American Graves Protection Act, Sections 5097.9-5097.991 of the Public Resources Code (Cal NAGPRA), and Section 7050.5 of the Health and Safety Code, if human remains were encountered during project development. However, on a regional level, the disturbance of human remains that are also considered archaeological resources may not be adequately mitigable through methods specified in these regulations because the value of the human remains may also lie in cultural mores and religion beliefs of applicable groups. Therefore, projects in the region would have the potential to result in cumulatively considerable impacts to human remains.

As described above for Impact CR-5, future development of accessory agricultural facilities would have the potential to result in impacts to human remains. The proposed project may allow ground disturbance which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact to human remains.

As described above for Impact CR-5, there are no feasible mitigation measures and no project alternatives that would reduce significant impacts associated with human remains to below significant. Therefore, impacts to human remains from future development of accessory agricultural facilities would remain cumulatively considerable.

Chapter 2.4, Hazards and Hazardous Materials Impacts

HZ-1 Significant Effect - Wildland Fires: The FEIR identifies potential significant impacts associated with exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires associated with the construction and maintenance activities under the proposed project.

Facts in Support of Findings: In addition to the potential loss of life and property, wildfires may result in the loss or permanent change of natural resources. Although natural conditions make wildfires common in San Diego County, construction and maintenance activities can result in increased fire related risk to people and structures. Construction and maintenance activities may

result in ignition sources which include vegetation clearing and piling, grading, site preparation, soil disturbances, concrete pouring, construction, and refueling. The vast majority of unincorporated San Diego County is ranked as High or Very High fire hazard.

M-HZ-1: The County Guidelines for Determining Significance for Wildland Fire and Fire Protection will be applied during the environmental review process for future projects under the Agriculture Promotion Program requiring discretionary permits. Feasible and project-specific mitigation contained within the County Guidelines will be applied as appropriate. When impacts are determined to be significant, feasible, and appropriate, project-specific mitigation measures will be implemented. Examples of standard mitigation measures within the County Guidelines include installation of fire suppression systems; maintaining sufficient onsite water storage; inclusion of fire management zones; and implementing funded agreements with fire protection districts.

The following measure that would reduce impacts related to wildland fires to below significant was also considered. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- Prohibit accessory agriculture uses in High and Very High fire hazard severity zones.

Because the mitigation measures noted above would to be infeasible; because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with wildland fires would remain significant and unavoidable.

HZ-2 Cumulatively Considerable Effect - Wildland Fires: As described above, implementation of the proposed project would have the potential to result in significant impacts associated with wildland fires. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact related to wildland fires.

Facts in Support of Findings: Southern California has a history of experiencing frequent and intensive wildland fires, which have exposed people and structures to a potentially significant loss of life and property. Growth occurring in the San Diego region, implemented under various cumulative projects, would likely place people and/or property within danger of wildland fires, due to the widespread risk across the region. Although regulations exist to reduce hazards associated with wildland fires, they would not reduce the risk to below a level of significance. Therefore, projects in the region would have the potential to result in cumulatively considerable impacts to wildland fires.

As described for Impact HZ-1, construction and maintenance activities under the proposed project would have the potential to result in impacts to wildland fires. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact to wildland fires.

As described for Impact HZ-1, none of the feasible mitigation measures and project alternatives would reduce the project's significant impacts associated with wildland fires to below significant. Therefore, potential impacts related to wildland fires due to the construction and maintenance activities under the proposed project would remain cumulatively considerable.

Chapter 2.5, Hydrology and Water Quality Impacts

HY-1 Significant Effect - Water Quality: The increase of accessory agricultural uses in the unincorporated areas of San Diego County would result in additional pollutant discharges and such discharges may violate surface water quality standards or otherwise substantially degrade water quality.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to water quality. The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-HY-1: During the environmental review process for future discretionary permits for accessory agricultural uses, the County Guidelines for Determining Significance for Hydrology and Water Quality Resources shall be applied. When impacts on hydrology are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated.

M-HY-2: Comply with the NPDES, RWQCB's Conditional Waivers, County of San Diego WPO, and the County Grading Ordinance, require preparation of storm water management plans as applicable, and implement BMPs.

Because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to water quality would remain significant and unavoidable.

HY-2 Significant Effect – Erosion and Siltation: The land-disturbing activities associated with the construction of new or expanded agriculture operations may result in the alteration of drainage patterns that could cause substantial erosion or siltation on or off site.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to erosion and siltation. The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-HY-1: During the environmental review process for future discretionary permits for accessory agricultural uses, the County Guidelines for Determining Significance for Hydrology and Water Quality Resources shall be applied. When impacts on hydrology are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated.

M-HY-2: Comply with the NPDES, RWQCB's Conditional Waivers, County of San Diego WPO, and the County Grading Ordinance, require preparation of storm water management plans as applicable, and implement BMPs.

Because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts from erosion and siltation would remain significant and unavoidable.

HY-3 Cumulative Impact – Water Quality: As described above, the increase of accessory agricultural uses in the unincorporated areas of San Diego County would result in additional pollutant discharges and such discharges may violate surface water quality standards or otherwise substantially degrade water quality. Therefore, in combination with other past, present and foreseeable future projects, the project would have the potential to contribute to a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with water quality due to grading, excavation or other ground-disturbing activities that might result in additional pollutant discharges. Cumulative projects that would have the potential to result in adverse impacts to water quality from development activities include development allowed by the General Plan Update and the development of land uses as designated under surrounding jurisdictions' general plans. Although development and operation of most cumulative projects would be subject to state and local regulations that require compliance with water quality standards, cumulative impacts could result from the contribution all projects considered together.

As described above for Impact HY-1, future development of accessory agricultural facilities would have the potential to result in additional pollutant discharges that may violate surface water quality standards or otherwise substantially degrade water quality and which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact to water quality.

As described above for Impact HY-1 there are no mitigation measures and no project alternatives that would reduce significant impacts associated with water quality to below significant. Therefore, impacts to water quality from future development of accessory agricultural facilities would remain cumulatively considerable.

HY-4 Cumulative Impact – Erosion and Siltation: As described above, the land-disturbing activities associated with the construction of new or expanded agriculture operations may result in the alteration of drainage patterns that could cause substantial erosion or siltation on or off site. Therefore, in combination with other past, present and foreseeable future projects, the project would have the potential to contribute to a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with erosion and siltation due to grading, excavation or other ground-disturbing activities that might result in additional pollutant discharges. Cumulative projects that would have the potential to result in adverse impacts to erosion and siltation from development activities include development allowed by the General Plan Update and the development of land uses as designated under surrounding jurisdictions' general plans. Although development and operation of most cumulative projects would be subject to state and local regulations that require compliance with water quality standards, cumulative impacts could result from the contribution all projects considered together.

As described above for Impact HY-2, future development of accessory agricultural facilities would have the potential to result in land-disturbing activities associated with the construction of new or expanded agriculture operations may result in the alteration of drainage patterns that could cause substantial erosion or siltation on or off site and which may contribute to cumulative impacts. Therefore, the proposed project would potentially contribute to a cumulatively considerable impact related to erosion and siltation.

As described above for Impact HY-2 there are no mitigation measures and no project alternatives that would reduce significant impacts related to erosion and siltation to below significant. Therefore, erosion and siltation impacts from future development of accessory agricultural facilities would remain cumulatively considerable.

Chapter 2.6, Noise Impacts

N-1 Significant Effect - Excessive Noise Levels: The FEIR identifies significant impacts related to the implementation of the proposed project, there could be a significant impact due to both onsite operational noises and future offsite noise increases from the addition of new traffic on area roadways.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to excessive noise levels.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with noise levels would remain significant and unavoidable.

N-2 Significant Effect - Permanent Increase in Ambient Noise: The FEIR identifies significant impacts related to the implementation of the proposed project associated with perceptible increases in noise levels and/or substantial permanent increases in ambient noise levels from the addition of new traffic on area roadways.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to a permanent increase in ambient noise.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with a permanent increase in ambient noise levels would remain significant and unavoidable.

N-3 Permanent Increase in Ambient Noise: The FEIR identifies significant impacts related to the implementation of the proposed project associated with onsite generated noise levels.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to a permanent increase in ambient noise.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with a permanent increase in ambient noise levels would remain significant and unavoidable.

N-4 Cumulatively Considerable Effect - Excessive Noise Levels: As described above, implementation of the proposed project would have the potential to result in excessive noise levels. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable noise impact.

Facts in Support of Findings: A cumulative noise impact would occur if construction and operation associated with cumulative regional land use projects, such as those identified in adjacent city and county general plans and regional transportation plans, combined would exceed the noise compatibility guidelines and standards of the Noise Element. However, development and operation of most cumulative projects would be subject to regulations that require compliance with noise standards, such as those contained in the State of California Code of Regulations and those required by the Office of Surface and Mining.

As described for Impact N-1, implementation of the proposed project would have the potential to result in a noise impact. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact related to excessive noise levels.

As described for Impact N-1, there are no feasible mitigation measures, and none of the project alternatives would reduce the project's significant impacts associated with the excessive noise to below significant. Therefore, potential noise impacts related to excessive noise levels due to the development of accessory agricultural facilities would remain cumulatively considerable.

N-5 Cumulatively Considerable Effect - Permanent Increase in Ambient Noise: As described above, implementation of the proposed project would have the potential to result in a permanent increase in ambient noise. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable noise impact.

Facts in Support of Findings: A cumulative noise impact would occur if construction and operation associated with cumulative regional land use projects, such as those identified in adjacent city and county general plans and regional transportation plans, combined would permanently increase ambient noise levels in the Noise Element. For example, the extension of State Route (SR) 905 from I-805 to the U.S.-Mexico international border and widening of SR-94 from SR-125 to Jamacha Road would result in a permanent increase in ambient noise due to an increase in roadway noise. However, development and operation of most cumulative projects would be subject to local regulations that require compliance with noise standards. The exception would be projects proposed in Mexico along the U.S.-Mexico international border and on tribal lands. Therefore, even though required regulations would minimize the cumulative impact of projects in the United States, development of land uses in Mexico along the U.S.-Mexico international border or on tribal lands that permanently increase noise would not be required to comply with the same noise standards, and a cumulatively considerable impact could potentially occur.

As described for Impact N-1 and N-2, implementation of the proposed project would have the potential to result in a noise impact. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact related to a permanent increase in ambient noise due to noise from implementation of the proposed project.

As described for Impact N-1 and N-2, there are no feasible mitigation measures and none of the project alternatives would reduce the project's significant impacts associated with the noise to below significant. Therefore, potential noise impacts related to a permanent increase in ambient noise due to the implementation of the proposed project would remain cumulatively considerable.

Chapter 2.7, Traffic Impacts

T-1 Significant Effect – County Roadway Segments and State Highway Segments Under Build-out Conditions: The FEIR identifies significant impacts related to an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system associated with the implementation of the proposed project. The proposed project could potentially generate traffic that would exceed average daily trip (ADT) thresholds and in turn could conflict with a plan, policy or ordinance that establishes measures of the effectiveness of the circulation system performance.

Facts in Support of Findings: Implementation of the proposed project could potentially generate traffic that would exceed ADT thresholds and in turn could conflict with a plan, policy or ordinance that establishes measures of the effectiveness of the circulation system performance for roads and State Highways within the County.

The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-T-1: During the environmental review process for future discretionary approval for accessory agricultural uses, the County Guidelines for Determining Significance for Transportation and Traffic shall be applied.

M-T-2: Implement the County Mobility Element and Public Road Standards during review of new development projects.

M-T-3: Implement the San Diego County TIF Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development.

Because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with traffic would remain significant and unavoidable.

T-2 Significant Effect – Project Level Impact County Roadway Segments and State Highway Segments: The FEIR identifies significant impacts related to an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system associated with the development of agricultural accessories under the proposed project. Future individual accessory agricultural use projects could potentially generate traffic that would exceed average daily trip (ADT) thresholds and in turn could conflict with a plan, policy or ordinance that establishes measures of the effectiveness of the circulation system performance.

Facts in Support of Findings: Implementation of the proposed project could potentially generate traffic that would exceed ADT thresholds and in turn result in significant direct impact from the project level impacts on County roadways and State Highways from future individual accessory agricultural use projects.

The mitigation measures identified in the FEIR would reduce the impact, but not to below a level of significance:

M-T-1: During the environmental review process for future discretionary approval for accessory agricultural uses, the County Guidelines for Determining Significance for Transportation and Traffic shall be applied.

M-T-2: Implement the County Mobility Element and Public Road Standards during review of new development projects.

M-T-3: Implement the San Diego County TIF Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development.

Because application of all feasible mitigation would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with traffic would remain significant and unavoidable.

T-3 Cumulatively Considerable Effect - County Roadway Segments and State Highway

Segments: As described above, the implementation of the proposed project would have the potential to generate traffic that could exceed ADT thresholds and, in turn, could conflict with a plan, policy or ordinance that establishes measures of the effectiveness of the circulation system performance. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Findings: Under the cumulative traffic scenario in the County's General Plan Update, the proposed project would have a cumulatively considerable impact on traffic operations for 15 roadway segments through the unincorporated County (12.5 total centerline miles). In regards to State Highway operations, the proposed project would result in cumulatively considerable impacts on 1 State Highway segments throughout the unincorporated County (0.8 centerline miles). The cumulative addition of traffic from individual agricultural accessory use projects, when combined with all past, present, and reasonably foreseeable future projects in the County, would result in a cumulatively considerable impact on County roadway segments and State Highways. Therefore, cumulative projects in the region would have the potential to result in cumulatively considerable impacts due to potential conflicts with an applicable plan, ordinance, or policy establishing measures of the effectiveness of the circulation system performance.

As described for Impacts T-1 and T-2, implementation of the proposed project would have the potential to exceed ADT thresholds. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact related to a conflict with a plan, policy or ordinance that establishes measures of the effectiveness of the circulation system performance.

As described for Impacts T-1 and T-2, there are no feasible mitigation measures, and none of the project alternatives would reduce the project's significant impacts associated with traffic to below significant. Therefore, potential traffic impacts related to a conflict with a plan, policy or ordinance that establishes measures of the effectiveness of the circulation system performance due to the implementation of the proposed project would remain cumulatively considerable.

Chapter 2.8, Water Supply and Groundwater Impacts

WS-1 Significant Effect - Water Supply: The FEIR identifies significant impacts related to the implementation of the proposed project, there could be a significant impact due to the location and number of new or expanded water service connections that could be required from accessory agricultural uses operating by-right under the amended Zoning Ordinance are not known and could result in a demand for water where currently none exists.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to water supply.

M-WS-1: Implement Policy I-84 requiring discretionary projects obtain water district commitment that water services are available. Prohibition of the conversion of any dryland agricultural or non-irrigated lands to crop production.

M-WS-2: Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and support continued implementation and enhancement of water conservation programs.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with water supplies would remain significant and unavoidable.

WS-2 Significant Effect - Groundwater Supply: The FEIR identifies significant impacts related to the implementation of the proposed project, there could be a significant impact due to the potential need to drill additional wells to support increased onsite demands.

Facts in Support of Findings: The implementation of the proposed project would have the potential to result in significant impacts related to groundwater supplies.

M-WS-3: Use the County Guidelines for Determining Significance for Groundwater Resources, Surface Water Quality, and Hydrology to identify and minimize adverse environmental effects on groundwater resources. Implement the Groundwater Ordinance through a Groundwater Investigation in order to ensure that groundwater resources are adequate to meet the groundwater demands of the project.

Because no appropriate feasible and enforceable mitigation measures could be identified that would reduce impacts to less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with groundwater supplies would remain significant and unavoidable.

WS-3 Cumulatively Considerable Effect - Water Supply: As described above, the implementation of the proposed project would have the potential to result in a significant cumulative impact due to the location and number of new or expanded water service connections that could be required from accessory agricultural uses operating by-right under the amended Zoning Ordinance are not known and could result in a demand for water where currently none exists. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

Facts in Support of Findings: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with water supplies. However, proposed project consists of a zoning ordinance amendment and is not project specific; therefore, the potential demands on imported water supply of specific future agricultural projects cannot be determined at this stage, nor can appropriate project-specific mitigation measures be identified or enforced. Therefore, cumulative projects in the region would have the potential to result in cumulatively considerable impacts due to potential demands on imported water supplies for future agricultural projects.

As described for Impacts WS-1, implementation of the proposed project would have the potential to result in an impact related to water supplies. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact related to water supply.

As described for Impacts WS-1, there are no feasible mitigation measures, and none of the project alternatives would reduce the project's significant impacts associated with the water supplies to

below significant. Therefore, potential water supply impacts related to the location and number of new or expanded water service connections that could be required from accessory agricultural uses would remain cumulatively considerable.

WS-4 Cumulatively Considerable Effect - Groundwater Supply: As described above, the implementation of the proposed project would have the potential to result in groundwater supply impacts related to potential demands on imported water supply of specific future agricultural projects. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact related to the potential need or depletion of groundwater supplies.

Facts in Support of Findings: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with groundwater supplies. The proposed project consists of a zoning ordinance amendment and is not project specific; therefore, the potential demands on groundwater supplies of specific future agriculture projects cannot be determined at this stage, nor can appropriate project-specific mitigation measures be identified or enforced. Additionally, the number and location of new or expanded agricultural operations that will rely on groundwater for their primary water source is unknown, and the proposed project may cause or contribute to depletion of groundwater supplies where supplies are limited and/or yields of groundwater are low. Therefore, cumulative projects in the region would have the potential to result in cumulatively considerable impacts due to potential demands on groundwater supplies for future agricultural projects.

As described for Impacts WS-2, implementation of the proposed project would have the potential to result in an impact related to groundwater supplies. Therefore, in combination with other past, present and foreseeable future projects, the proposed project would potentially contribute to a cumulatively considerable impact related to groundwater supply.

As described for Impacts WS-2, there are no feasible mitigation measures, and none of the project alternatives would reduce the project's significant impacts associated with the groundwater supplies to below significant. Therefore, potential groundwater supply impacts related to potential demands on imported water supply of specific future agricultural projects would remain cumulatively considerable.

Section B - Findings Regarding Alternatives

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Three alternatives to the proposed project were analyzed: the Reduced Project Area Alternative; the Lot Size Use Restriction Alternative, and the No Project Alternative. These alternatives are compared to the impacts of the proposed project and are assessed relative to their ability to meet the basic objectives of the proposed project.

The following provides a summary of the alternatives analyzed in Chapter 4.0 of the FEIR, as well as a rationale as to why the Proposed Project is preferred over each alternative and why each alternative has been rejected.

Reduced Project Area Alternative

The Reduced Project Area Alternative (refer to Subchapter 4.2 of the FEIR) would reduce the area of application of the County's Zoning Ordinance Amendments, and the Agriculture Promotion Program would apply only to those areas that are within the San Diego County Water Authority Boundary indicating that they are likely to be served by existing municipal water resources. Properties that are dependent on groundwater (either through private wells, water companies, or groundwater-dependent water districts) for their supply would be excluded from the proposed Zoning Ordinance changes. Under the Reduced Project Area Alternative, many environmental effects would be similar in nature to those described in the proposed project. Although the impacts would be reduced due to the elimination of groundwater-dependent areas which would result in a reduction in project area of approximately 1,387 square miles.

This Alternative would reduce the potential impacts to groundwater supply by excluding groundwater-dependent areas. This alternative would be consistent with some of the objectives of the proposed project; however, it would not achieve some objectives to the same degree as the proposed project, encourage the growth of the local agriculture industry as well as streamline and clarify the approval/permitting process for accessory agricultural operations. As such, this alternative is rejected because it is infeasible for social, economic and other reasons. Pursuant to CEQA Guidelines Section 15093, a Statement of Overriding Considerations has been prepared.

Lot Size Use Restriction Alternative

The Lot Size Use Restriction Alternative (refer to Subchapter 4.3 of the FEIR) would allow the changes proposed as part of the Agriculture Promotion Program to apply only to those properties within the unincorporated County that are 4 acres or larger within the same zoning classifications as specified by the proposed project. This Alternative would also more directly reduce potential impacts related to adjacency with other land uses (such as the nuisance impact from odors and localized groundwater availability). Because most communities have a high volume of smaller lot sizes near their town centers, it could also avoid some traffic impacts within the centers. The Alternative would achieve some of the project objectives with varying degrees of success as it would allow all proposed accessory agricultural uses to occur on properties large enough to accommodate those larger accessory agricultural uses. However, it would not allow lands that are less than 4 acres in size the flexibility that the proposed project allows and therefore, it would not encourage growth of the local agriculture industry as well as streamline and clarify the approval/permitting process for accessory agricultural operations to the same degree as the proposed project.

As such, this alternative is rejected because it is infeasible for social, economic and other reasons. Pursuant to CEQA Guidelines Section 15093, a Statement of Overriding Considerations has been prepared.

No Project Alternative

Under the No Project Alternative (refer to Subchapter 4.4 of the FEIR) the Zoning Ordinance related to accessory agricultural uses and approval and permitting requirements would remain as it is today. The No Project Alternative would maintain the existing regulations and permitting requirements for uses currently allowed in agricultural zones as governed by the current zoning code. The No Project Alternative would not achieve any of the project objectives identified for the proposed project.

Overall, the No Project Alternative would have fewer impacts than the proposed project (refer to Section 4.4 of the FEIR.) The No Project Alternative is rejected because it fails to meet the project objectives to encourage the growth of the local agriculture industry as well as streamline and clarify the approval/permitting process for accessory agricultural operations.

**DECISION AND EXPLANATION REGARDING RECIRCULATION
OF THE FINAL ENVIRONMENTAL IMPACT REPORT
Agricultural Promotion Program
POD-14-001; GPA-16-004; LOG No. 15-00-001; SCH No. 2015061047**

February 2017

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15088.5(a), the County of San Diego is required to recirculate a Draft Environmental Impact Report (EIR) when significant new information is added to the Draft EIR after public review of the Draft EIR, but before certification. "Information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the project's proponents have declined to implement. "Significant new information" can include:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

BACKGROUND: The Draft Environmental Impact Report (EIR) was first circulated for public review from April 28, 2016, to June 13, 2016 (45-day public review period). All interested persons and organizations had an opportunity during this time to submit their written comments on the Draft EIR to the County of San Diego. In response to comments received during that public review period, revisions were made to the environmental analysis including traffic, air quality/greenhouse gas emissions, noise, references and the Traffic Impact Assessment. These revisions did not result in new or more severe environmental impacts or otherwise meet the definition for "significant new information". Nevertheless, to ensure that adequate public review was provided the County decided to recirculate certain portions of the Draft Revised EIR sections, as well as the Traffic Impact Assessment. This recirculated public review was conducted because a previously identified significant and unmitigable impact was greatly reduced through development and application of revised methodology; however, the impact did remain significant and unmitigable.

Pursuant to CEQA Guidelines Section 15088.5(f)(2), reviewers were directed to limit their comments to only the revised sections or portions of the recirculated EIR and the revised Traffic Impact Assessment. The Revised Draft EIR, as well as the Traffic Impact Assessment, was recirculated from November 18, 2016, to January 3, 2017 for a 45-day public review period. No additional comment letters were received on the Draft Revised EIR. Responses to all comments received during the initial public review period were prepared and are included in the Final EIR.

No further changes were made in response to public comments in the Final EIR. However, the County made minor changes to several sections of the EIR to correct minor errors and provide

clarification and consistency. The changes did not alter the substance, analysis, or conclusion of the EIR.

DECISION: The Board of Supervisors has reviewed the changes made to the Revised Draft EIR following public review, and determines that no “significant new information” has been added and therefore, recirculation of the Final EIR is not required. The following provides an explanation of the modifications made to the Final EIR.

EXPLANATION: The changes to the Final EIR subsequent to the public review period are shown in strike-out the Draft Final EIR. Revisions to the Final EIR were not made in response to comments made during public review. Rather, they were made by the County for the purposes of clarification and consistency and no substantive new information has been added to the EIR. While an exhaustive list of changes is not included here, the following provides examples of some of the lengthier changes to the EIR.

Changes to the Chapter 1 of the EIR

The following changes were made to Chapter 1 of the EIR. Changes are shown in strikeout/underlined text.

- Pages 1-19, Section 1.5 Intended Uses of the EIR was modified to further explain why the EIR is described as project-level rather and program-level:

Additionally, this EIR is described as a project-level EIR, rather than a program-level EIR, due to the fact that there would be no further discretionary review of future by-right development proposed by some of the proposed Zoning Ordinance changes.

- Pages 1-20, Section 1.5.2 Related Environmental Review and Consultation Requirement was updated to provide the results of consultation with Native American tribes:

Only one tribe, the Pala Band of Luiseno, requested consultation and in December 2016 the Band informed staff that consultation could be closed.

Changes to the Chapter 2, Environmental Effects of the Proposed Project, of the EIR

The following are some of the changes made to Chapter 2 of the EIR. Changes are shown in strikeout/underlined text.

- Pages 2-1, was expanded to provide some further explanation regarding the organization of each section:

The organization of the discussion of potential project impacts varies from section to section depending on the level of information available for each use promoted by the proposed project. In some cases, there is sufficient information for each use to support a separate subsection to describe the potential impacts. In other cases, providing separate subsections would be highly redundant and, therefore the potential impacts of the various uses are described as a combined section. County of San Diego Guidelines for Determining Significance were reviewed and applied as appropriate in this EIR. However, the County of San Diego Guidelines for Determining Significance were primarily written with the intent to be applied to development projects and, therefore, are inappropriate to directly apply to a policy project, such as the proposed Agricultural Promotion Project. Project-specific thresholds that are consistent with past County policy projects were applied to the proposed project.

Section 2.1, Air Quality and Greenhouse Gases

- Various edits were made throughout the section to clarify that agricultural tourism, farm employee housing, aquaponics/fish markets, and mobile butchering may have some new vehicle trips but they are expected to be minimal. The following is one example:

Because agricultural tourism, aquaponics/fish markets, and mobile butchering would not support relatively few new building construction or operational vehicle trips, they have a relatively low emissions potential (see Table 2.1-7).

Section 2.2, Biological Resources

- Various edits were made throughout Section 2.2.3.1, Candidate Sensitive, or Special-Status Species, to provide use-by-use conclusory statements so that all sections include the statements.

Section 2.3, Cultural Resources

- Various edits were made throughout Section 2.3.3.1, Historic Resources, to provide use by use conclusory statements so that all sections include the statements.

Changes to Appendix D, Air Quality and Greenhouse Gas Thresholds and Modeling Outputs

- Under the *Diesel Particulate Matter* subheading for the *Health-Based Thresholds for Project-Generated Pollutants of Human Health Concern* discussion, the cancer risk level threshold was corrected, as follows:

The “substantial” DPM threshold defined by the County is exposure of a sensitive receptor to an individual emissions source resulting in an excess cancer risk level of more than 1 in 10 million or a non-cancer (i.e., chronic or acute) hazard index (HI) greater than 1.0.

- Under the *Numeric Bright-Line* subheading for the *Thresholds for Greenhouse Gases* discussion, the following clarifying edits to the paragraph have been made:

The screening level is based on the CAPCOA white paper (<http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>) and identifies residential and commercial projects that would result in sufficiently low GHG emissions to be less than cumulatively considerable without mitigation. Some Most of the uses potential accessory uses, including microbreweries and wineries, would result in emissions similar to commercial and retail uses. Therefore, this is a viable threshold approach to determine significance for the various uses proposed by the ordinance change.

MITIGATION MONITORING AND REPORTING PROGRAM
for the

Agricultural Promotion Program
(POD-14-001; GPA-16-004; LOG No. 15-00-001)
SCH No. 2015061047

February 2017

INTENTIONALLY LEFT BLANK

Mitigation Monitoring and Reporting Program

Mitigation measures have been identified in the Final Environmental Impact Report (FEIR) for the Agricultural Promotion Program POD 14-001 to reduce or eliminate potential environmental impacts. The County of San Diego (County) is required to implement all adopted mitigation measures. In order to ensure compliance, the following mitigation monitoring and reporting program has been formulated. This program consists of a list of the project impacts and detailed descriptions of the mitigation measures.

A mitigation chart has been prepared for the project. The chart identifies each project impact and the related mitigation measures, monitoring schedule, and the department or staff position responsible for verifying compliance. The following is an explanation of the eight columns of the mitigation chart.

- Column 1 Impact:** Each impact is numbered and briefly described.
- Column 2 Mitigation Measures:** Each measure is numbered and briefly described.
- Column 3 Monitoring Activity:** This column identifies the County department or other public agency that is responsible for determining compliance with the mitigation measure.
- Column 4 Timing:** The monitoring schedule depends upon the progression of the overall project. Therefore, specific dates are not used in the “Timing” column. Instead, scheduling describes a logical succession of events (e.g., after 100 permits issued, annual).
- Column 5 Responsibility:** This column identifies the department or staff position responsible for ensuring the mitigation measure is completed within the correct timing period.
- Column 6 Initial:** The monitor verifies completion of the particular mitigation measure by initialing and dating in this column. Where the “Timing” column indicates annual or other ongoing mitigation measures, verification of compliance may not occur until completion or expiration of the project. Provision of all required signatures within this column signifies conclusion of the monitoring program.
- Column 7 Date:** The monitor dates the completion of the mitigation measure, which is the same date that Column 6 is initialed.
- Column 8 Remarks:** The status of ongoing and cumulative mitigation measures is to be documented throughout the process. This space should be used for specific comments pertaining to the status of the mitigation measure. If there are additional comments, they should be attached to the chart.

The County adopts this program to comply with Public Resource Code Section 21081.6 and California Environmental Quality Act (CEQA) Guidelines Section 15097.

Mitigation Monitoring and Reporting Program

INTENTIONALLY LEFT BLANK

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Monitoring Activity	Timing	Responsibility	Initial	Date	Remarks
Air Quality and Greenhouse Gases							
AQ-1, AQ-2	M-AQ-1 During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Grading can generate fugitive dust, including PM10 and PM2.5. Projects that involve site grading, excavation, or substantial material movement will implement dust control measures during construction, as applicable, in compliance with SDAPCD Rule 55. Examples of standard mitigation measures within the County Guidelines include: fugitive dust control measures, grading restrictions, and vehicle travel and use restrictions.	The County shall ensure that future discretionary projects are evaluated with the County Guidelines for Determining Significance for Air Quality and/or implement any necessary and feasible project-specific mitigation measures related to air quality.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
AQ-1, AQ-2	M-AQ-2 During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Construction projects typically require equipment such as bulldozers, graders, loaders, scrapers, backhoes, and heavy trucks. Project applicants will utilize clean-diesel, alternative fuel, or other engine controls to reduce equipment and vehicle exhaust emissions during construction. Project applicants will implement control measures, as applicable, to reduce equipment and exhaust related emissions.	The County shall ensure that future discretionary projects are evaluated with the County Guidelines for Determining Significance for Air Quality and/or implement any necessary and feasible project-specific mitigation measures related to air quality.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
AQ-1, AQ-2	M-AQ-3 During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Building construction may result in off-gassing of ROG from architectural coatings and paints that exceed the County's threshold. Project applicants will reduce ROG emissions related to architectural coatings through the use of low Volatile Organic Compound (VOC) coatings (VOC content less than or equal to 50 grams per liter).	The County shall ensure that future discretionary projects are evaluated with the County Guidelines for Determining Significance for Air Quality and/or implement any necessary and feasible project-specific mitigation measures related to air quality.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
AQ-1, AQ-2, AQ-6	M-AQ-4 During the environmental review process for future discretionary permits, the County Guidelines for Determining Significance for Air Quality will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Project applicants will implement control measures, as applicable, to reduce operational related criteria pollutant and GHG emissions. General strategies include: utilizing efficient building materials, include landscape designs such as shade trees and irrigation controllers, and incorporate renewable	The County shall ensure that future discretionary projects are evaluated with the County Guidelines for Determining Significance for Air Quality and/or implement any necessary and feasible project-specific mitigation measures related to air quality.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			

County of San Diego Agricultural Promotion Program EIR MMRP
February 2017

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Monitoring Activity	Timing	Responsibility	Initial	Date	Remarks
AQ-3, AQ-7 Potential direct and cumulative impacts related to objectionable odors.	energy. Additional strategies for microbreweries, wineries, and dairies include preparation and implementation of an energy management system. M-AQ-5 During the environmental review process for future discretionary permits, the County <i>Guidelines for Determining Significance for Air Quality</i> shall be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Creameries/ dairies and animal raising may generate odors from animal waste. Microbreweries and wineries may also result in temporary odors during fermenter venting. Project applicants will implement best management practices to control odors.	The County shall ensure that future discretionary projects are evaluated with the County <i>Guidelines for Determining Significance for Air Quality</i> and/or implement any necessary and feasible project-specific mitigation measures related to air quality.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
AQ-4, AQ-5, AQ-8, and AQ-9 Potential direct and cumulative impacts related to greenhouse gas emissions and conflicts with an applicable GHG reduction plan, policy, or regulation.	M-AQ-4 During the environmental review process for future discretionary permits, the County <i>Guidelines for Determining Significance for Air Quality</i> will be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures will be incorporated. Project applicants will implement control measures, as applicable, to reduce operational related criteria pollutant and GHG emissions. General strategies include: utilizing efficient building materials, include landscape designs such as shade trees and irrigation controllers, and incorporate renewable energy. Additional strategies for microbreweries, wineries, and dairies include preparation and implementation of an energy management system.	The County shall ensure that future discretionary projects are evaluated with the County <i>Guidelines for Determining Significance for Air Quality</i> and/or implement any necessary and feasible project-specific mitigation measures related to air quality.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Monitoring Activity	Timing	Responsibility	Initial	Date	Remarks
Biological Resources BI-1, BI-3, BI-4, BI-5, BI-7, and BI-8	M-BIO-1 During the environmental review process for future discretionary permits for accessory agricultural uses, the County <i>Guidelines for Determining Significance for Biological Resources</i> shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated pursuant to CEQA and RPO, BMO, and HLP Ordinance requirements, as applicable. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.	The County shall ensure that future discretionary projects are evaluated with the County <i>Guidelines for Determining Significance for Biological Resources</i> and implement any necessary and feasible project-specific mitigation measures related to candidate, sensitive, or special-status species.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
BI-2, BI-3, BI-4, BI-6, BI-7, and BI-8	M-BIO-2 Require that development projects obtain CWA Section 401/404 permits issued by the California RWQCB and USACE for applicable discretionary project-related disturbances of waters of the U.S. and/or associated wetlands. Also continue to require that discretionary projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from CDFW for applicable project-related disturbances of streambeds.	The County shall ensure condition discretionary projects to obtain these permits when applicable.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
Cultural Resources CR-1 and CR-6	M-CR-1 During the environmental review process for future discretionary permits for accessory agricultural uses, the County will provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. This will be done by reaching out to property owners with identified historic resources to participate. Known historic resources will also be designated as such by the County and subject to review by the Historic Site Board to ensure that significant impacts are avoided.	The County shall provide incentives through the Mills Act to encourage property owners to protect historic resources identified on site for future discretionary permits for accessory agricultural uses where applicable.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
CR-1, CR-2, CR-3, CR-6, CR-7, CR-8	M-CR-2 During the environmental review process for future Administrative, Minor Use, and Major Use Permits for agricultural accessory uses, proposed projects under the Agriculture Promotion Project will complete a full records search with the South Coastal Information Center. The result of the search will be used by a qualified archaeologist to provide a recommendation regarding potential cultural resources, methods for avoidance, and appropriate mitigation should impacts be anticipated. Consultations with Tribes will be conducted as appropriate pursuant to Senate Bill 18 and AB 52 to identify resources and implement feasible mitigation if impacts would occur.	The County shall ensure a full records search is completed and a recommendation is obtained for future discretionary permits for accessory agricultural uses where applicable.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
CR-3 and CR-8	M-CR-3	The County shall conduct	Discretionary Permit	Planning & Development			

County of San Diego Agricultural Promotion Program EIR MMRP

February 2017

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Monitoring Activity	Timing	Responsibility	Initial	Date	Remarks
Potential direct, indirect, and cumulative impacts on tribal cultural resources	During the environmental review process for future discretionary permits for accessory agricultural uses, the County will proactively work with the Tribes to identify tribal cultural resources and areas that require Tribal notification pursuant to AB 52.	tribal consultation during future discretionary permit review pursuant to AB 52 where applicable.	environmental review process	Services – Project Planning Division			
Hazards and Hazardous Materials							
HZ-1 and HZ-2 Direct, indirect, and cumulative effects wildland fires	M-HZ-1 The County Guidelines for Determining Significance for Wildland Fire and Fire Protection will be applied during the environmental review process for future projects under the Agriculture Promotion Program requiring discretionary permits. Feasible and project-specific mitigation contained within the County Guidelines will be applied as appropriate.	The County shall ensure that future discretionary projects are evaluated with the County Guidelines for Determining Significance for Wildland Fire and Fire Protection and implement any necessary and feasible project-specific mitigation measures related to wildfire hazards.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
Hydrology and Water Quality							
HY-1 and HY-3 Potential direct, indirect, and cumulative impact on surface water quality	M-HY-1 During the environmental review process for future discretionary permits for accessory agricultural uses, the County Guidelines for Determining Significance for Hydrology and Water Quality Resources shall be applied. When impacts on hydrology are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated.	The County shall ensure future discretionary projects are evaluated with the County Guidelines for Determining Significance for Hydrology and Water Quality Resources and/or implement any necessary and feasible project-specific mitigation measures related to hydrology and water quality.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
HY-2 and HY-4 Potential direct, indirect, and cumulative impacts from erosion or siltation	M-HY-2 Comply with the NPDES, RWQCB's Conditional Waivers, County of San Diego WPO, and the County Grading Ordinance, require preparation of storm water management plans as applicable, and implement BMPs.	The County shall ensure future discretionary projects are evaluated for compliance with the regulations, prepares a storm water management plan as applicable, and implements BMPs.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
Transportation and Traffic							

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Monitoring Activity	Timing	Responsibility	Initial	Date	Remarks
T-1 Potential direct on County roadway segments and State Highways associated with buildout of the project	M-T-1 During the environmental review process for future discretionary approval for accessory agricultural uses, the <i>County Guidelines for Determining Significance for Transportation and Traffic</i> shall be applied. M-T-2 Implement the County Mobility Element and Public Road Standards during review of new development projects.	The County shall ensure future discretionary projects are evaluated for compliance with the <i>County Guidelines for Determining Significance for Transportation and Traffic</i> and implement any necessary and feasible project-specific mitigation measures related to transportation and traffic.	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
T-2 Potential direct impacts on County Roadways and State Highways from individual accessory agricultural uses	M-T-1 and M-T-2	Same as above	Discretionary Permit environmental review process	Planning & Development Services – Project Planning Division			
T-3 Cumulative addition of traffic from individual agricultural accessory uses	M-T-3 Implement the San Diego County TIF Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development.	The County shall ensure all building permits are processed with applicable TIF fees in compliance with the TIF Ordinance.	TIF payments are collected at time of Building permit approval	Planning & Development Services – Building Division			
Water Supply and Groundwater							
WS-1 and WS-3 Potential direct and cumulative impacts to imported water supply.	M-WS-1 Implement Policy I-84 requiring discretionary projects obtain water district commitment that water services are available. Prohibition of the conversion of any dryland agricultural or non-irrigated lands to crop production. M-WS-2 Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and support continued implementation and enhancement of water conservation programs.	The County shall require service availability letters as required by Policy I-84 for all applicable discretionary permits. The County shall coordinate with the San Diego County Water Authority and other water agencies.	Discretionary Permit environmental review process Administrative and Major Use Permit environmental review process	Planning & Development Services – Project Planning Division Planning & Development Services – Advance Planning Division			

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Monitoring Activity	Timing	Responsibility	Initial	Date	Remarks
WS-2 and WS-4 Potential direct and cumulative impacts to groundwater supplies.	M-WS-3 Use the <i>County Guidelines for Determining Significance for Groundwater Resources, Surface Water Quality, and Hydrology</i> to identify and minimize adverse environmental effects on groundwater resources. Implement the Groundwater Ordinance through a Groundwater Investigation in order to ensure that groundwater resources are adequate to meet the groundwater demands of the project.	The County shall ensure future discretionary projects are evaluated for compliance with the <i>County Guidelines for Determining Significance for Groundwater Resources, Surface Water Quality, and Hydrology</i> and implement any necessary and feasible project-specific mitigation measures related to groundwater.	Discretionary Permit environmental review process	Planning & Development Services—Project Planning Division			