

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

EXECUTIVE OFFICER SUMMARY REPORT

October 8, 2025

ITEM NO. 6

SUBJECT

Approval Consideration of Tentative Resolution No. R9-2025-0054, *Proposed Mitigated Negative Declaration for Adoption of Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County* (Tentative Resolution No. R9-2025-0054). (Dr. Mahsa Izadmehr)

STAFF RECOMMENDATION

Staff recommend approval of Tentative Resolution No. R9-2025-0054 (**Supporting Document 1**).

KEY ISSUES

- 1) Approval of Tentative Resolution No. R9-2025-0054 will approve a Mitigated Negative Declaration (**Supporting Document 2**), and certify that the San Diego Water Board complied with the California Environmental Quality Act (CEQA) with respect to Tentative Order No. R9-2025-0012, *Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County* (Tentative Order, see Supporting Document 1 for item 8).
- 2) The Mitigated Negative Declaration containing the San Diego Water Board's assessment of the reasonably foreseeable environmental impacts from discharges regulated by the Tentative Order and from compliance with the Tentative Order.
- 3) The Mitigated Negative Declaration concludes adoption of the Tentative Order will not have a significant impact on the environment provided Demler Brothers LLC (Discharger) implements specific mitigation/management measures.

PRACTICAL VISION

San Diego Water Board staff, through the development and public notification of Tentative Resolution No. R9-2025-0054 continue to uphold the values of the San Diego Water Board, which is consistent with the Proactive Public Outreach and Communication and the Strategize for Healthy Waters, Monitor and Assess, and Resilient Local Water Supply chapters of the San Diego Water Board's Practical Vision

(see **Practical Vision** section of the **Executive Officer Summary Report** for item 7).¹ Approval of Tentative Resolution No. R9-2025-0054 completes the CEQA process for the Tentative Order.

DISCUSSION

The purpose of this item is to provide the San Diego Water Board with information to assist in its consideration of Tentative Resolution No. R9-2025-0054. Tentative Resolution No. R9-2025-0054, if approved will certify that the San Diego Water Board has complied with the California Environmental Quality Act (CEQA) and approved a Mitigated Negative Declaration for the project. The project for the purposes of CEQA is adoption of the Tentative Order. The Tentative Order establishes requirements for discharges of waste to land at Pine Hill Egg Ranch and Pullet Farm. Board staff initially prepared a Negative Declaration for the project. Following review of written comments received on the Negative Declaration, staff revised the Initial Study to reflect mitigation measures and prepared and circulated a Mitigated Negative Declaration.

The Discharger owns and operates Pine Hill Egg Ranch and Pullet Farm both located in Ramona, San Diego County (**Supporting Document 3**). Pine Hill Egg Ranch houses approximately 1.5 million chickens which produce about 800,000 eggs per day and has the capacity to house up to two million chickens. Pine Hill Egg Ranch generates animal waste² and chicken carcasses as part of the commercial agricultural operations. In addition, Pine Hill Egg Ranch generates process water from egg washing operations. The Pullet Farm houses 400,000 pullets (young chickens). The Pullet Farm generates animal waste and pullet carcasses but doesn't generate any process water.

The San Diego Water Board is considering adoption of a Tentative Order establishing requirements for discharges of waste to land at Pine Hill Egg Ranch and Pullet Farm. Because no local agencies are required to take a discretionary action on the project, the San Diego Water Board is the lead agency under CEQA and is responsible for evaluating environmental impacts and preparing environmental documents for the project.

The Mitigated Negative Declaration supports the determination that the project will not have a significant impact on the environment because the Discharger must comply with the requirements of the Tentative Order. The Tentative Order requires the Discharger to:

- Implement effective management measures, and structural and non-structural best management practices (BMPs) to ensure proper storage, handling, and disposal of animal waste, chicken carcasses, and egg wash process water;

¹ Practical Vision:

https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/

² Animal waste includes manure, soiled bedding, urine, eggs, feathers generated from Pine Hill Egg Ranch or the Pullet Farm.

- Develop a groundwater monitoring program to routinely assess groundwater quality; and
- Submit annual monitoring reports.

The San Diego Water Board initially released a draft Negative Declaration, a draft Initial Study, Tentative Resolution, and Tentative Order for public review on May 21, 2025. San Diego Water Board staff received a total of thirteen (13) comments letters related to the draft and tentative documents during the 30-day public comment period (**Supporting Document 4**). The San Diego Water Board received comment letters from members of the public, the Discharger, and the California Department of Transportation (Caltrans). The primary focus of these letters, with respect to CEQA, are summarized below:

- Public comments expressed concerns related to: 1) odor and air quality impacts; 2) alleged nitrate contamination in groundwater; 3) alleged unauthorized discharges to Santa Teresa Creek; 4) the Discharger's poor compliance history; and 5) the need for additional regulatory oversight. Some letters also requested enhanced air quality protections, reclassification of air quality and odor impacts as significant, additional monitoring requirements, independent inspections, and an improved public complaint process.
- Caltrans comments requested the Discharger must submit a traffic plan, obtain encroachment permits, and prevent potential right of way impacts.

Staff prepared a single Response to Comments Report which contains responses to all written comments received on the Negative Declaration and the Tentative Order (**Supporting Document 5**). The Response to Comments Report also describes any substantive changes made to the Negative Declaration, Initial Study, and Tentative Order.

Staff prepared a Mitigated Negative Declaration, to replace the Negative Declaration, in response to revisions made to the Initial Study and Tentative Order. Staff circulated the Mitigated Negative Declaration, revised Initial Study, revised Tentative Resolution, revised Tentative Order, and Response to Comments Report on August 29, 2025, for a 30-day public review period. The Initial Study and Tentative Order display additions as red-underline text and deletions as ~~red-strikeout text~~.

PUBLIC NOTICE

The Tentative Resolution and Negative Declaration were released for public review and comment and posted on the San Diego Water Board website on May 21, 2025, with written comments due by June 20, 2025. The Notice of Public Hearing and Comment Period was posted on the San Diego Water Board website for the duration of the comment period and sent to all known interested persons by email on May 21, 2025 (**Supporting Document 6**). The Tentative Resolution and Mitigated Negative Declaration were released for public review on the San Diego Water Board website on

August 29, 2025. An updated Notice of Public Hearing and Review Period (**Supporting Document 7**) was posted on the San Diego Water Board website and sent to all known interested persons by email on August 29, 2025.

SUPPORTING DOCUMENTS

1. Tentative Resolution No. R9-2025-0054
2. Mitigated Negative Declaration
3. Pine Hill Egg Ranch and Pullet Farm Vicinity and Facility Maps
4. Comments Letters
5. Response to Comments Report
6. Notice of Public Hearing and Written Comment Period
7. Notice of Public Hearing and Review Period.