

**BEFORE THE BOARD OF SUPERVISORS
COUNTY OF TULARE, STATE OF CALIFORNIA**

IN THE MATTER OF THE APPROVAL AND)
ADOPTION OF AN ADDENDUM TO THE) **RESOLUTION NO. 2020-0430**
FINAL ENVIRONMENTAL IMPACT)
REPORT CERTIFIED ON DECEMBER 12,)
2017, FOR THE 2017 ANIMAL)
CONFINEMENT FACILITIES PLAN AND)
DAIRY AND FEEDLOT CLIMATE ACTION)
PLAN FOR THE PURPOSE OF)
CONSIDERING THE 2020 AMENDMENTS)
TO THE 2017 ANIMAL CONFINEMENT)
FACILITIES PLAN AND DAIRY AND)
FEEDLOT CLIMATE ACTION PLAN)

UPON MOTION OF SUPERVISOR TOWNSEND, SECONDED BY SUPERVISOR CROCKER, THE FOLLOWING WAS ADOPTED BY THE BOARD OF SUPERVISORS, AT AN OFFICIAL MEETING HELD JULY 21, 2020, BY THE FOLLOWING VOTE:

AYES: SUPERVISORS CROCKER, VANDER POEL, SHUKLIAN, VALERO AND TOWNSEND
NOES: NONE
ABSTAIN: NONE
ABSENT: NONE



ATTEST: JASON T. BRITT
COUNTY ADMINISTRATIVE OFFICER/
CLERK, BOARD OF SUPERVISORS

BY: *Mercedes Gomez*
DEPUTY CLERK

Resolution of the Board of Supervisors of the County of Tulare ("Board") accepting the Tulare County Planning Commission ("Planning Commission") recommendation and approving an Addendum to the 2017 Final Environmental Impact Report ("2017 FEIR") for the 2017 Animal Confinement Facilities Plan ("2017 ACFP") and the 2017 Dairy and Feedlot Climate Action Plan ("2017 Dairy CAP") for the purpose of considering the proposed 2020 Amendments to the 2017 ACFP and 2017 Dairy CAP.

WHEREAS, the Planning Commission recommends by its Resolution No. 9745 that the Board consider and approve an Addendum ("2020 Addendum") (Attachment 1) to the 2017 FEIR in compliance with the California Environmental Quality Act ("CEQA") and the CEQA Guidelines for the purposes of review of the proposed 2020 Amendments to the 2017 ACFP and 2017 Dairy CAP ("2020

Amendments”); and

WHEREAS, the County completed an initial CEQA Checklist as part of the preparation of the proposed 2020 Addendum to the 2017 FEIR and determined that none of the conditions set forth in Public Resources Code Section 21166 and CEQA Guidelines Section 15162 would require the preparation of a Subsequent or Supplemental Environmental Impact Report with respect to the adoption of the proposed 2020 Amendments; and

WHEREAS, at a duly noticed Planning Commission hearing on July 8, 2020, which hearing was recorded, County staff presented evidence regarding the 2020 Addendum and proposed 2020 Amendments to the Planning Commission and answered Planning Commission questions on the matter;

WHEREAS, at said Planning Commission hearing, public testimony was received and considered regarding the 2020 Addendum and proposed 2020 Amendments; and

WHEREAS, the Planning Commission is the advisory body to the Board with respect to the 2020 Addendum and proposed 2020 Amendments, and adopted its Resolution No. 9746 recommending approval and adoption of said Addendum and proposed Amendments; and

WHEREAS, the Board is the decision-making body for the 2020 Addendum and proposed 2020 Amendments; and

WHEREAS, the Board held a duly noticed public hearing on July 21, 2020, to consider the proposed 2020 Addendum and proposed 2020 Amendments, which public hearing was recorded; and

WHEREAS, County staff presented evidence at the public hearing, which was recorded, and during that public hearing the Board provided an opportunity for, received, and considered public testimony on the matter at such hearing.

NOW, THEREFORE, BE IT RESOLVED that the Board, pursuant to the above findings and based on a thorough review of the proposed 2020 Addendum, the 2017 Final EIR, and evidence received to date, finds and determines as follows:

1. That the 2020 Addendum to the 2017 EIR was prepared in compliance with CEQA, the CEQA Guidelines, and Tulare County local CEQA procedures.

2. That based on substantial evidence in light of the whole record, none of the conditions set forth in Public Resources Code Section 21166 and CEQA Guidelines Section 15162, including adoption of the proposed 2020 Amendments, have occurred that would require preparation of a Subsequent or Supplemental EIR, in that

- (a) no substantial changes are proposed in the Project described in the 2017 Final EIR that will require major revisions of the 2017 FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (b) no substantial changes have occurred with respect to the circumstances under which the Project described in the 2017 Final EIR is being undertaken which will require major revisions in the 2017 FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously

identified significant effects;

- (c) no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 2017 FEIR was certified as complete, has become available or shows; any of the following:
 - i. the Project described in the 2017 Final EIR will have one or more significant effects not discussed in the 2017 FEIR;
 - ii. significant effects previously examined will be substantially more severe than shown in the 2017 FEIR;
 - iii. mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents decline to adopt the mitigation measure or alternative; or
 - iv. mitigation measures or alternatives which are considerably different from those analyzed in the 2017 FEIR would substantially reduce one or more significant effects on the environment, but the Project proponents decline to adopt the mitigation measure or alternative.

3. In connection with the Board's review of the 2020 Amendments and the 2020 Addendum, the Board has considered the 2017 FEIR, has independently reviewed the 2020 Addendum, and has exercised its independent judgment in making the findings in this Resolution.

4. The Board approves and adopts the 2020 Addendum to the 2017 FEIR.

Exhibits: Exhibit "A" Addendum to the 2017 Final EIR for the 2017 ACFP and 2017 Dairy CAP

Exhibit "A"

**TULARE COUNTY
RESOURCE MANAGEMENT AGENCY**



5961 South Mooney Boulevard
Visalia, CA 93277

**ADDENDUM TO THE FINAL ENVIRONMENTAL
IMPACT REPORT CERTIFIED ON DECEMBER 12, 2017,
FOR THE 2017 ANIMAL CONFINEMENT FACILITIES
PLAN AND 2017 DAIRY AND FEEDLOT CLIMATE
ACTION PLAN FOR THE COUNTY OF TULARE**

FOR GENERAL PLAN AMENDMENT NO. 20-009
TO AMEND THE 2017 ANIMAL CONFINEMENT
FACILITIES PLAN AND THE 2017 DAIRY AND
FEEDLOT CLIMATE ACTION PLAN

June 2020

Prepared by

Tulare County Resources Management Agency
Planning Branch
Environmental Planning Division

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I. INTRODUCTION

General Plan Amendment No. 20-009 (“GPA 20-009”) is a requirement of a Stipulated Settlement (effective August 2, 2019) completely resolving Case No. 272380 - Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, Superior Court, State of California, County of Tulare, Visalia Division, challenging the certification by the County of Tulare of the 2017 Environmental Impact Report for the 2017 Animal Facilities Confinement Plan and related General Plan Amendments Zone Changes, and Dairy and Feedlot Climate Action Plan. The ACFP and Dairy CAP are components of the County’s General Plan and are part of the Settlement Agreement by and between the Sierra Club, Association of Irrigated Residents, and Center for Biological Diversity (collectively “Petitioners” or “Plaintiffs”) and the County of Tulare, a political subdivision of the State of California and the Board of Supervisors of the County of Tulare (collectively “County”).

A. DETERMINATION

This document is an Addendum to the 2017 Environmental Impact Report (“EIR”) that was certified by the Tulare County Board of Supervisors (“Board”) on December 12, 2017, for the 2017 Animal Confinement Facilities Plan (“ACFP”) and the 2017 Dairy and Feedlot Climate Action Plan (“Dairy CAP”). This Addendum examines the environmental effects of proposed GPA 20-009 for the 2020 Amendments to the 2017 ACFP and 2017 Dairy CAP. This document has been prepared in accordance with the relevant provisions of the California Environmental Quality Act (“CEQA”) of 1970 (as amended) and the Guidelines for Implementation of the California Environmental Quality Act (“CEQA Guidelines”) as implemented by the County of Tulare.

As verified in this Addendum, the analyses and conclusions in the 2017 EIR remain current and valid. The proposed Project, would not cause new significant effects not identified in the 2017 EIR nor increase the level of environmental effect to substantial or significant, and, hence, no new mitigation measures would be necessary to reduce significant effects. No change has occurred with respect to circumstances surrounding the Proposed Project that would cause new or substantially more severe significant environmental effects than were identified in the 2017 EIR. In addition, no new information has become available that shows that the project would cause new or substantially more severe significant environmental effects which have not already been analyzed in the 2017 EIR. Therefore, no further environmental review is required beyond this Addendum.

This Addendum incorporates all of the mitigation measures detailed in the 2017 EIR. With this Addendum, the proposed Project would still be within the framework of the evaluation for the 2017 ACFP and 2017 Dairy CAP as documented in the 2017 EIR.

B. BACKGROUND

On November 30, 2011, in accordance with CEQA, the County of Tulare filed a Notice of Preparation (“NOP”) with the California State Clearinghouse in the Governor’s Office of

Planning and Research as notification that a Draft EIR would be prepared for the 2017 ACFP and 2017 Dairy CAP. The NOP was distributed to involved public agencies and other interested parties for a 30-day public review period. The purpose of the public review period was to solicit comments on the scope and content of the environmental analysis to be included in the EIR.

On February 3, 2016, a Notice of Completion for a Draft EIR for the 2017 ACFP and 2017 Dairy CAP was filed with the State Clearinghouse, together with the requisite number of copies of the Draft EIR to be mailed to affected public agencies and interested parties, indicating a 45-day review period commencing on February 4, 2016, and ending on March 21, 2016.

On February 4, 2016, a Notice of Availability of a Draft EIR was duly published in the Visalia Times-Delta, Porterville Recorder, and Dinuba Sentinel, which are newspapers of general circulation in Tulare County, as well as the Bakersfield Californian and Delano Record in Kern County.

On February 4, 2016, a Notice of Availability of a Draft EIR was posted in the office of the Tulare County Clerk for a 45-day public review period commencing on February 4, 2016, and ending on March 21, 2016.

On September 8, 2017, a copy of the written responses to the timely public comments on the Draft EIR was sent to the commenting public agencies and interested parties in a manner that public agencies and interested parties received it at least 10 days before the Board of Supervisors meeting where the Board was scheduled to act upon the Planning Commission's recommendation to certify the EIR.

On October 12, 2017, a Notice of Availability of a Draft EIR and Notice of Public Hearing was duly published in the Visalia Times-Delta, Porterville recorder, Dinuba Sentinel, Bakersfield Californian, and Delano Record, newspapers of general circulation, for a Planning Commission meeting set for October 25, 2017.

On October 25, 2017, the Planning Commission held a duly notice meeting where staff presented evidence regarding the Final EIR and the Project to the Planning Commission and answered Planning Commission questions, and the Commission held a duly notice public hearing where public testimony was received and recorded regarding the Project and Final EIR.

On October 25, 2017, the Planning Commission reviewed the Final EIR, Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program ("MMRP") for the Project and recommended by Resolution No. 8358 that the Board of Supervisors certify the Final EIR and adopt the Findings of Fact, Statement of Overriding Considerations, and MMRP.

On December 1, 2017, a Notice of Public Hearing was published in the Visalia Times-Delta for a public hearing before the Board at its regular meeting on December 12, 2017.

On December 12, 2017, public testimony was received and recorded at the Board of Supervisors hearing regarding the Project and Final EIR.

On December 12, 2017, after notice and hearing, the Board adopted the 2017 ACFP as the updated Chapter 12 of the Tulare County 2030 General Plan Update, approved and adopted the 2017 Dairy CAP, and approved and certified a Final Environmental Impact Report ("2017 FEIR") and adopted the CEQA Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program ("MMRP") pursuant to the California Environmental Quality Act ("CEQA").

The 2017 Final EIR formally evaluated the environmental impacts of the 2017 ACFP and 2017 Dairy CAP. The 2017 Final EIR was prepared pursuant to the California Environmental Quality Act (CEQA). On December 12, 2017, after notice and hearing, the Board adopted the 2017 ACFP as the updated Chapter 12 of the Tulare County 2030 General Plan Update, approved and adopted the 2017 Dairy CAP, and approved and certified a Final Environmental Impact Report ("2017 FEIR") and adopted the CEQA Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program ("MMRP") pursuant to CEQA.

As discussed below in Section II.B. of this Addendum, GPA 20-009 proposes an Amendment to the 2017 ACFP and 2017 Dairy CAP. This Amendment to the 2017 ACFP and 2017 Dairy CAP constitutes project modifications that were not evaluated in the 2017 EIR, which necessitates subsequent environmental review/documentation under CEQA.

According to Section 15164(a) of the CEQA Guidelines, the lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred (further described below under Section I.D).

The Tulare County Board of Supervisors is the Lead Agency under CEQA and has prepared this Addendum to address the potential environmental impacts of implementing the proposed Project.

C. PURPOSE OF THIS ADDENDUM

The purpose of this Addendum is to evaluate whether the proposed Project would result in any new or substantially greater significant effects or require any new mitigation measures not identified in the 2017 EIR for the 2017 ACFP and 2017 Dairy CAP. This Addendum, together with the 2017 EIR, will be used by the Board when considering the proposed Project.

D. CEQA FRAMEWORK FOR ADDENDUM

According to Section 15164(a) of the CEQA Guidelines, the lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. An addendum does not need to be circulated for public review but can be included in or attached to the final EIR. The decision making body shall consider the addendum with the final EIR prior to making a decision on the project. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an

addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Section 15162(a) of the CEQA Guidelines states that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would be substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Addendum evaluates the proposed Project as a revision of the 2017 EIR for the 2017 ACFP and 2017 Dairy CAP and demonstrates that these modifications do not trigger any of the conditions described above. Based on the analysis provided below, an Addendum to the 2017 EIR is the appropriate CEQA document.

II. PROJECT INFORMATION

A. SUMMARY OF THE 2017 ACFP AND 2017 DAIRY CAP

The 2017 ACFP and Dairy CAP revised the way dairies are regulated by the County of Tulare. Under the ACFP that was adopted in 2000, expansions of existing dairies and bovine facilities, and establishment of new dairies and bovine facilities, must be approved through the special use permit process.

Some of the County's 302 dairies and 28 other confined bovine facilities (feed lots and calf ranches) were approved under the 2000 ACFP or predecessor regulations. Other, grandfathered, facilities were established prior to such regulations. The 2017 ACFP provides for permitting of all existing and proposed facilities or their expansion.

Under the 2017 ACFP, the expansions of existing dairies and bovine facilities or new dairies which fully comply with the requirements of the 2017 ACFP and with mitigation measures adopted following certification of the 2017 Final EIR may be eligible for a site plan review process for permitting approval; such approval would be preceded by the submittal of technical reports and environmental evaluation followed by written findings that the expansion or new facility is within the scope of the Program EIR. All other expansions, as well as the establishment of new dairies and other bovine facilities (calf ranches and feedlots), would be approved through a special use permit process with additional CEQA evaluation.

The 2017 Dairy CAP provided a procedure for CEQA climate change evaluations. The 2017 Dairy CAP includes inventories and projections of GHG emissions, an approach for determining whether an individual dairy/feedlot's contribution is cumulatively considerable, accounts for existing and anticipated future dairy/feedlot emissions that are consistent with the Dairy CAP and its proposed GHG reduction measures, and establishes a monitoring plan for tracking mitigation measure performance. Below is a link to the 2017 EIR for the 2017 ACFP and 2017 Dairy CAP:

<https://tularecounty.ca.gov/rma/index.cfm/permits/dairy/>

B. SUMMARY OF THE PROPOSED PROJECT

GPA 20-009 proposes to: 1) reduce the 2017 ACFP "streamlining" screening level for dairy expansions (Policy 2.5-3 of the 2017 ACFP) to no more than once every five years, 2) reduce the 2017 ACFP "streamlining" screening level for dairy expansions listed in the Conformance Checklist Criteria in Appendix A to the 2017 ACFP from 25,000 MT of CO₂e per year to 15,000 MT of CO₂e per year, and 3) move certain GHG emission reduction strategies from Category B to Category A in the Dairy CAP.

GPA 20-009 is not expected to create any new impacts and is not expected to exacerbate any previously identified impacts. Instead, it is anticipated that the project would reduce impacts since:

1. Dairies would be limited to no more than one "streamlining" screening level dairy expansion every five years. Under the existing ACFP and Dairy CAP there is no limit to how often dairies could utilize "streamlining" screening level dairy expansions.
2. Only dairy expansions that generate less than 15,000 metric tons per year of net GHG Emissions would qualify for "streamlining" screening level dairy expansion, while under the 2017 ACFP and 2017 Dairy CAP dairy expansions that generate less than 25,000 metric tons of net GHG Emissions would qualify for "streamlining" screening level dairy expansion.
3. Some GHG emission reduction strategies would simply move from Category B to Category A in the Dairy CAP.

III. ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

The following section discusses environmental topics and related environmental effects in the 2017 EIR, to compare the 2017 ACFP and Dairy CAP and the proposed Project. These topics are listed in the sequence that they are addressed in the 2017 EIR. This section concludes by determining that all of the mitigation measures from the 2017 EIR remain intact.

A. ENVIRONMENTAL TOPICS ANALYZED IN THE 2017 EIR FOR THE ACFP AND 2017 DAIRY CAP

Chapter Three of the 2017 EIR discusses the following resources:

- Aesthetics
- Agricultural Land/Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils and Mineral Resources
- Greenhouse Gas/Energy Impact Analysis
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use/Population/Housing
- Noise
- Public and Utility Services
- Recreation
- Transportation/Traffic

The only resources that need to be discussed in this Addendum are Air Quality and Greenhouse Gas/Energy Impact Analysis. All of the other resources would have no change whatsoever in relation to impacts and mitigation measures as a result of this Addendum and no additional analysis of those resources is necessary.

1. Air Quality

Section 3.3 of the 2017 EIR analyzed Air Quality impacts of the 2017 ACFP and 2017 Dairy CAP and found that they would have the following impacts:

Impact #3.3.1 – Conflict With or Obstruct Implementation of any Applicable Air Quality Plan: [Evaluation Criteria (a)]

Conclusion: Because proposed Program emissions would conflict with applicable SJVAPCD ozone and PM2.5 Plans, this impact is significant.

Mitigation Measure #3.3.1: The County will require, as a component of the ACFP Annual Compliance Report, owners to submit evidence of full compliance with all pertinent SJVAPCD permits and regulations. If there is evidence of non-compliance, the County will notify the SJVAPCD and require the owner to submit a Corrective Action Plan.

Significance after Mitigation: Conflicts with applicable air quality plans would remain significant because it cannot be guaranteed that all future project-level air quality impacts would be below SJVAPCD significance thresholds.

Impact #3.3.2 – Cause a Violation of any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation: [Evaluation Criteria (b)]

Conclusion: Emissions increases exceed the SJVAPCD’s significance thresholds for VOC, PM10 and PM2.5. Because proposed Program emissions would violate or contribute to violation of air quality standards, the impact is significant.

Mitigation Measure #3.3.2: The County will require, as a component of the ACFP Annual Compliance Report, owners to submit evidence of full compliance with all pertinent SJVAPCD permits and regulations. If there is evidence of non-compliance, the County will notify the SJVAPCD and require the owner to submit a Corrective Action Plan.

Significance after Mitigation: The imposition of the mitigation measure would reduce the Program impacts for new dairy and other bovine facilities, but they remain significant because Program impacts would likely still exceed SJVAPCD significance thresholds.

Impact #3.3.3: Result in a Cumulatively Considerable Net Increase of any Criteria Pollutant for Which the Project Region is Non-attainment Under an Applicable Federal or State Ambient Air Quality Standard: [Evaluation Criteria (c)]

Conclusion: Because the proposed Program emissions of VOC and PM2.5 would be cumulatively considerable, they are also significant.

Mitigation Measure #3.3.3: The County will require, as a component of the ACFP Annual Compliance Report, owners to submit evidence of full compliance with all pertinent SJVAPCD permits and regulations. If there is evidence of non-compliance, the County will notify the SJVAPCD and require the owner to submit a Corrective Action Plan.

Effectiveness of Measures: The imposition of mitigation measures would reduce the Program impacts for new dairy and other bovine facilities, but they remain significant because Program emissions would likely still be cumulatively considerable for VOC (an ozone precursor) and PM2.5.

Impact #3.3.4: Expose Sensitive Receptors to Substantial Pollutant Concentrations:
[Evaluation Criteria (d)]

Conclusion: New or expanding dairies and other bovine facilities would comply with SJVAPCD air quality requirements, including Rule 4550 and 4570, and their requirements for health risk assessments and mitigation of health risk. Because sensitive receptors would not be exposed to substantial pollutant concentrations based on siting restrictions and compliance with SJVAPCD regulations, this impact is considered less than significant.

Mitigation Measures: None are required.

Impact #3.3.5: Exposure of a Substantial Number of People to Sources of Objectionable Odors: [Evaluation Criteria (e)]

Conclusion: Based on the above analysis, the proposed Program would not expose a substantial number of people to objectionable odors. The odor impact for expanded or new dairy and other bovine facilities is less than significant.

Mitigation Measure: None are required.

2. Greenhouse Gas/Energy Impact Analysis

Section 3.7 of the 2017 EIR analyzed Greenhouse Gas/Energy Impact Analysis impacts of the 2017 ACFP and 2017 Dairy CAP and found that they would have the following impacts:

Impact #3.7.1 - Increase in GHG Emissions Compared to Existing Conditions:
[Evaluation Criteria (a)]

Conclusion: Because the proposed Program would result in a substantial net increase in GHG emissions, this impact is significant.

Mitigation Measure #3.7.1: The Draft Dairy CAP identifies all potentially feasible GHG reduction strategies for dairies and other bovine facilities. Because of the site-specific variations in individual facilities, some emissions reductions measures are likely to be feasible at most facilities (Category A), but some are not (Category B). Feasible project-specific GHG reduction measures will be adopted as CEQA mitigation measures when the County approves expanded or new facilities under the ACFP; project-specific GHG reductions achieved by project-specific mitigation measures will be quantified at that time. The County will require, as a component of the ACFP Annual Compliance Report, owners to submit evidence that adopted GHG mitigation measures are being implemented. If there is evidence of non-compliance, the County will require the owner to submit a Corrective Action Plan.

Significance after Mitigation: Because of the current infeasibility of avoiding or substantially lessening the proposed Program's net increases in GHG emissions, this impact is considered significant and unavoidable.

Impact #3.7.2 - Inconsistent with Tulare County's General Plan Climate Action Plan or TCAG's RTP/SCS: [Evaluation Criteria (b)]

Conclusion: The proposed Program, specifically the Draft Dairy CAP, conflicts with certain procedural aspects of the Tulare County General Plan CAP, and does not conflict with the TCAG RTP/SC. It is uncertain whether the procedural inconsistencies with the General Plan CAP would lead to GHG emissions increases greater than estimated in Impact #3.7.1, but to be conservative this impact is considered significant.

Mitigation Measure #3.7.2: See mitigation measure for Impact #3.7.1.

Significance after Mitigation: See discussion for Impact #3.7.1.

Impact #3.7.3 - Inconsistent with the State's Ability to Achieve AB 32, EO B-30-15, and S-3-05 Emissions Reductions Targets: [Evaluation Criteria (c)]

Conclusion: Because the proposed Program would be inconsistent with the state's ability to achieve AB 32, EO B-30-15, and S-3-05 emissions reductions targets beyond 2020, this impact is significant.

Mitigation Measure #3.7.3: See mitigation measure for Impact #3.7.1.

Significance after Mitigation: See discussion for Impact #3.7.1.

Impact #3.7.4 - Use Energy in an Inefficient, Wasteful, or Unnecessary Manner: [Evaluation Criteria (d)]

Conclusion: This impact is less than significant.

Mitigation Measures: None are required.

Impact #3.7.5- Increased Reliance on Fossil Fuels and Decreased Reliance on Renewable Energy Sources: [Evaluation Criteria (e)]

Conclusion: This impact is less than significant.

Mitigation Measures: None are required.

B. MITIGATION MEASURES

The 2017 Final EIR identified mitigation measures that would reduce or eliminate potential environmental effects of the 2017 ACFP and 2017 Dairy CAP. However, after implementing all feasible mitigation measures the 2017 ACFP and 2017 Dairy CAP will result in significant

adverse environmental impacts that cannot be avoided and a Statement of Overriding Considerations was adopted by the Board because in the Board's judgement, the benefits of the 2017 ACFP and 2017 Dairy CAP outweighed its unavoidable significant effects. All of the mitigation measures approved for the 2017 ACFP and 2017 Dairy CAP will also apply to the proposed Project, and no additional mitigation measures are necessary for the proposed Project.

IV. CONCLUSION

On the basis of the evaluation presented in Section III, the modifications and refinements of the Proposed Project would not trigger any of the conditions listed in Section I.D of this Addendum, requiring preparation of a subsequent or supplemental environmental impact report or negative declaration. Thus, this Addendum satisfies the requirements of CEQA Guidelines sections 15162 and 15164. The Proposed Project does not introduce new significant environmental effects, substantially increase the severity of previously identified significant environmental effects, or show that mitigation measures or alternatives previously found not to be feasible would in fact be feasible.

Overall, the components of the proposed Project would be similar to those of the 2017 ACFP and 2017 Dairy CAP, and would result in environmental effects similar to those of the 2017 ACFP and 2017 Dairy CAP. The proposed Project would not result in new significant effects or effects that would be substantially more severe than those identified in the 2017 Final EIR. The mitigation measures included in the 2017 Final EIR would remain applicable.

The analyses and conclusions in the 2017 Final EIR remain current and valid. The proposed revisions of the proposed Project would not cause new or substantially more severe significant effects than identified in the 2017 Final EIR, and thus no new mitigation measures would be required. No change has occurred with respect to circumstances surrounding the proposed Project that would cause new or substantially more severe significant environmental effects than identified in the 2017 Final EIR, and no new information has become available that shows that the project would cause significant environmental effects not already analyzed in the 2017 Final EIR. Therefore, no further environmental review is required beyond this Addendum to the 2017 Final EIR.