

2.2 Agriculture and Forest Resources

This section assesses general agriculture and forest resources in the County of San Diego (County) and identifies potential agriculture and forest resource impacts that could occur as a result of implementation of the proposed project. The information used in this analysis is general in nature and is derived from the most readily available information in applicable resource and planning documents. Site-specific Local Agricultural Resource Assessment (LARA) models were not performed for the proposed project.

2.2.1 Existing Conditions

The County has 6,687 farms, more than any other county in California (USDA 2009). Agriculture in the County provides an array of economic, environmental, and social benefits that contribute to the quality of life in the region. Agricultural production takes place on 315,296 acres of land, less than 12% of the entire county. Additionally, approximately 94% of the County's agricultural value occurs on 60,285 acres, which reflects the high dollar value and intense land use associated with specialty crops such as nursery, flower, fruit, and nut crops, as well as vegetable production (County of San Diego 2009).

Future equine projects implemented under the amended Zoning Ordinance could occur in unincorporated portions of the County over which the County has land use jurisdiction. Specifically, the proposed project applies to properties that are zoned with an Animal Designator D–J, L–N, U, V, or X, totaling 344,665 acres, that support or have the potential to support the development of equine facilities. These equine facilities and operations can occur within both developed and natural areas. However, the exact location of future equine projects is currently unknown. As a result, it is not possible to provide more specific information regarding existing agricultural resource conditions that could be affected by the proposed Zoning Ordinance Amendment.

Crops and Operations

The County has a subtropical climate that optimizes the production of a variety of crops that would be more difficult to produce elsewhere. With only 6% of the County's soils classified as prime, agriculture has succeeded by finding high value, specialty crops that take advantage of the unique microclimates. The County's unique topography creates a wide fluctuation of microclimates resulting in nearly 30 different types of vegetation communities. The County's climate and vegetation communities support a year-round growing season that facilitates small farms and crop diversification, producing over 200 agricultural commodities—from strawberries along the coast, apples in the mountain areas, to palm trees in the desert. The success of the County's diverse agricultural industry is reflected in 45 commercial crops, each holding a value of over \$1 million.

In the County, 68% of farms are between 1 and 9 acres, with an average farm size of 4 acres. The County's farmers rank number one in both California and the nation in the production value of nursery, floriculture, and avocados. Statewide, the County is in the top five counties in the production of oranges, chickens, fresh market tomatoes, eggs, mushrooms, tangerines, grapefruit, and honey. In terms of agricultural value, major crop categories for the County include nursery and flower crops (cut flowers, bedding plants, foliage), fruit and nut crops (avocados, citrus, berries), vegetable crops (tomatoes, mushrooms, herbs), livestock and poultry (cattle, pigs, chickens), livestock and poultry products (milk, eggs, hide), field crops (barley, hay, oat), timber, and apiary products (honey, bees, wax, pollen). The top 10 crops grown in the County include indoor flowering and foliage plants, ornamental trees and shrubs, bedding plants, avocados, tomatoes, cut flower and foliage, eggs, poinsettias, strawberries, and Valencia oranges. Additionally, the County has the largest community of organic farming with 292 registered organic growers.

Forest Resources

“Forest land” is land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (California Public Resources Code, Section 12220(g)). The County does not include lands zoned specifically for forest land.

The Cleveland National Forest (CNF) covers a large part of the unincorporated County, including areas in Alpine, Central Mountain, Jamul–Dulzura, Julian, Mountain Empire, North Mountain, and Pendleton–De Luz. However, the CNF is primarily under the land use jurisdiction of the U.S. Forest Service (USFS), not the County.

Agricultural Zoning

Approximately 31% of the unincorporated area in the County is zoned A70 limited agriculture or A72 general agriculture. The A70 Use Regulations relate to crop production and allow for a limited number of small farm animals to be kept. The A72 Use Regulation is intended for both crops and animals.

Agricultural Land Use

The County's General Plan allows agricultural operations to occur under all land use designations. Most agricultural lands fall within the Rural and Semi-Rural land use designation. The General Plan encourages new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses; see Figure 2.2-1, for County-identified agricultural lands within the project area. Uses supportive of and/or compatible with agriculture include estate residential.

Williamson Act Contract Lands

The purpose of the Williamson Act contract is to preserve agricultural and open space lands by discouraging premature and unnecessary conversion to urban uses. In the unincorporated County, approximately 80,500 acres of private, federal, and state lands are in Williamson Act contract; see Figure 2.2-2 for Williamson Act contract lands within the project area. During the past 25 years, very few property owners have requested to enter into a Williamson Act contract within the County. According to the County Assessor's Office, only two contracts were executed in the County between 1980 and 2005, and 40 parcels currently under a Williamson Act contract are in the process of Non-Renewal, as defined by the Williamson Act. While the County contains an extensive amount of lands that are within agricultural preserves, many are not under contract, and in many cases are not being used for agriculture. Therefore, the County General Plan includes a future implementation program to remove lands from agricultural preserves, where appropriate. This is proposed to reduce costs to property owners, to streamline the disestablishment process, and to recognize that the land is not devoted to agriculture. Removal from the preserve would allow for the land to be used pursuant to the General Plan.

Department of Conservation Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) produces Important Farmland maps, which identify the suitability of agricultural lands in the State of California on a county-by-county basis. The classification of Important Farmlands is based on both land use and soil. In order for land to be shown as Prime Farmland or Farmland of Statewide Importance, land must have been used for irrigated agricultural production at some point within 4 years of the Important Farmland map publishing date and must contain soils that meet the physical and chemical requirements for classification as Prime Farmland/Farmland of Statewide Importance, as determined by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). The NRCS evaluates soil based on a variety of criteria, including available water capacity, soil temperature, acid-alkali balance, soil sodium content, and permeability rate (DOC 2012). The FMMP maps illustrate approximately 47.9 million acres of land in 49 counties in the State of California. FMMP maps are updated and released every 2 years. The Important Farmland Map categories and the acreage of the FMMP categories present in the County are described below.

Prime Farmland has the most favorable combination of physical and chemical features, enabling it to sustain long-term production of agricultural crops. This land possesses the soil quality, growing season, and moisture supply needed to produce sustained high yields. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to NRCS mapping. The County contains 8,251 acres designated Prime Farmland, or about 0.30% of the total County acreage.

Farmland of Statewide Importance is similar to Prime Farmland, but it possesses minor shortcomings, such as greater slopes and/or less ability to store moisture. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to NRCS mapping. The County contains approximately 10,959 acres of designated Farmland of Statewide Importance (0.40% of the total County acreage).

Unique Farmland is of lesser quality soils and is used for the production of the state's leading agricultural crops. Unique Farmland does not meet the above-stated criteria for Prime Farmland or Farmland of Statewide Importance, but it consists of areas that have been used for the production of specific crops with high economic value during the two update cycles prior to the mapping date. It has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained high-quality crop and/or high yields of a specific crop when treated and managed according to current farming methods. This land is usually irrigated, but it may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped some time during the 4 years prior to the mapping date. The County contains approximately 53,250 acres designated as Unique Farmland (1.96% of the total County acreage).

Farmland of Local Importance is important to the local agricultural economy, as determined by the County of San Diego Board of Supervisors and a local advisory committee. The County defines Farmland of Local Importance as land with the same characteristics as Prime Farmland or Farmland of Statewide Importance with the exception of irrigation. Approximately 134,892 acres of the County area is designated Farmland of Local Importance (about 4.97% of the total County acreage).

Grazing Land is land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres. Approximately 106,680 acres of the County is designated Grazing Land (about 3.93% of the total County acreage).

Urban and Built-Up Land consists of land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. Currently, there are 345,316 acres of urban and built-up land in the County (about 12.73% of the total County acreage).

Other Land consists of land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable

for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. There is approximately 1,507,345 acres of land designated as Other Land in the County (about 55.57% of the total County acreage). Figure 2.2-3, Farmland, Mapping and Monitoring Program Lands, shows the most recent farmland data for the important farmland types within the project area.

Local Agricultural Resource Assessment Model (LARA)

The LARA model has been developed by the County of San Diego Department of Planning and Land Use to assess the relative value of agricultural resources in the County. The LARA model serves as the local agricultural model that accounts for the variability of local agricultural resources and conditions. The County has chosen to use the LARA model to determine the importance of agricultural resources, rather than the Land Evaluation and Site Assessment model (LESA), because the LARA model accounts for the large number of farms in the County that are less than 10 acres in size and takes into account the County's unique soil conditions. The LESA model does not account for agricultural resources less than 10 acres in size. The County uses the LARA model to determine the importance of agricultural resources in the context of discretionary land use projects. The LARA model considers soils, climate, and water as primary model factors, while also considering the presence of Williamson Act contracts, other preserved lands, and existing land uses in the surrounding area.

2.2.2 Regulatory Setting

Federal Regulations

Farmland Protection Policy Act

The U.S. Department of Agriculture administers the Farmland Protection Policy Act of 1981. This act is intended to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses. The act also requires these programs to be compatible with state, local, and private efforts to protect farmland.

Cleveland National Forest Land Management Plan

With the exception of the CNF, forest lands are not common in the County. Approximately 402,434 acres of CNF land is located within the County, and management of forest lands is facilitated through the CNF Land Management Plan. According to the CNF Land Management Plan, the production of wood products, including fuel wood harvesting, is identified as a suitable activity/use within all designated land use zones (fuel wood harvesting is suitable by exception within the Critical Biological (CB) and Wilderness (W) land use zones) (USFS 2005).

State Regulations

California Public Resources Code

Section 4526 of the California Public Resources Code defines timberland as land (other than land owned by the federal government and land designated by the board as experimental forest land) that is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others.

According to Section 12220 (g) of the Public Resources Code, forest land refers to “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”

California Civil Code Section 3482.5 (The Right to Farm Act)

The Right to Farm Act is designed to protect commercial agricultural operations from nuisance complaints that may arise when an agricultural operation is conducting business in a “manner consistent with proper and accepted customs.” The code specifies that established operations that have been in business for 3 or more years that were not nuisances at the time they began shall not be considered a nuisance as a result of a new land use.

Farmland Mapping and Monitoring Program (FMMP)

The FMMP, established in 1982, produces maps and statistical data used for analyzing impacts to California’s agricultural resources. Agricultural land is rated according to the soil quality and irrigation status, with the best quality land called Prime Farmland. Maps are updated every 2 years, with current land use information gathered from aerial photographs, a computer mapping system, public review, and field reconnaissance.

California Land Conservation Act (Williamson Act)

The Williamson Act of 1965 was designed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The program requires a 10-year contract between the County and the land owner. While in contract, the land is taxed on the basis of its agricultural use rather than its market value. The land becomes subject to certain enforceable restrictions, and certain conditions need to be met prior to approval of an agreement. The goal of the Williamson Act is to protect agriculture and open space.

California Government Code

Government Code Section 51104 (g) defines a timberland production zone as an area that has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.

The County Zoning Ordinance does not identify timberland production zones within the unincorporated portion of the County.

Local Regulations

County of San Diego Code of Regulatory Ordinances Sections 63.401 through 63.407, Agricultural Enterprises and Consumer Information Ordinance

The ordinance defines and limits the circumstances under which agricultural enterprise activities, operations, and facilities will constitute nuisance. The ordinance recognizes that the commercial agricultural industry in the County is a significant element of the County's economy and a valuable open space/greenbelt resource for County residents. The ordinance establishes a procedure whereby prospective purchasers of property are notified in writing of the inherent potential conditions associated with agricultural operations found throughout the unincorporated area, including but not limited to noise, odors, dust, insects, rodents, and chemicals.

County of San Diego Board of Supervisors Policy I-38, Agricultural Preserves

The County Board of Supervisors Policy I-38 sets forth policies for the implementation of the Williamson Act. In 1965, the California Legislature added to the Government Code Sections 51200 et. seq., which authorized the County to establish Agricultural Preserves. Board Policy I-38 identifies criteria for the establishment, modification, and disestablishment of an Agricultural Preserve, including processing requirements, application fees, and hearing requirements. The policy also establishes minimum sizes that landowners must meet to be eligible for a contract, requires the application of zoning regulations, establishes eligibility criteria for filing an application for an Agricultural Preserve and contract with the County, and establishes criteria to cancel a contract including cancellation by eminent domain.

County of San Diego Board of Supervisor's Policy I-133 Support and Encouragement of Farming in San Diego County

In 2005, the Board of Supervisors adopted Policy I-133 to establish the County's support of agriculture. The policy recognizes the Board's commitment, support, and encouragement of farming in the County through the establishment of partnerships with landowners and other stakeholders to identify, secure, and implement incentives that support the continuation of

farming as a major industry in San Diego. The intent is to develop and implement programs designed to support and encourage farming in the County.

County of San Diego Farming Program

The County has completed a contract with American Farmland Trust to help develop the Farming Program. The Farming Program is intended to create the framework for an economically and environmentally sustainable farming industry for the County. The plan, if adopted, would include land use policies and programs to keep land available and affordable for farming on a voluntary basis. It would also include economic development tools to help improve farm profitability.

Agricultural Clearing Permit Requirements

A County Agricultural Clearing Permit is typically required for projects involving the clearing and/or removal of natural vegetation on agricultural land. The establishment of a new agricultural operation or the expansion of an existing operation into any area that has not been in agricultural production for at least 1 of the preceding 5 years may be required to obtain an agricultural clearing permit.

2.2.3 Analysis of Project Effects and Determination as to Significance

The proposed project consists of an amendment to the Zoning Ordinance related to equine uses in unincorporated portions of the County over which the County has land use jurisdictions; see Section 1.4, Project Components, for further details. The proposed Zoning Ordinance Amendment is provided as Appendix A to this environmental impact report (EIR). The following impact analysis below has been separated into Tier One/Tier Two and Tier Three/Tier Four to reflect the distinction in the level of review required for the establishment of each use (non-discretionary versus discretionary).

2.2.3.1 Conversion of Farmland

Guidelines for Determination of Significance

The following significance guideline from Appendix G of the California Environmental Quality Act (CEQA) Guidelines, applies to the direct and indirect impact analysis as well as the cumulative impact analysis.

A significant impact would result if:

- The project will result in the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, or other agricultural resources, to non-agricultural use.

Analysis

The proposed project would allow development of equine facilities that could adversely affect Important Farmland through ground-disturbing activities, such as excavation and grading, which have the potential to convert farmlands within the project area.

Tier One and Tier Two

Tier One and Tier Two uses developed under the proposed Zoning Ordinance Amendment could result in an increase of equine facilities including horse stables, animal enclosures, and pastures, as well as increase the amount of related infrastructure including parking lots, driveways, fences, and buildings. Although the proposed project could result in more equine facilities and related infrastructure, these facilities would be limited in size according to the Tier One and Tier Two categories, the useable area on the property, and the appropriate setbacks for these facilities.

These future equine uses would require ground disturbance that would not be subject to environmental review and, therefore, could convert Important Farmland. For purposes of evaluating equine uses under Tier One and Tier Two, a worst-case scenario disturbance footprint was developed based on CEQA assumptions described in Section 1.4.2 and Table 1-3 in Section 1.0, Project Description, and listed as follows:

1. Construction of Tier One and Tier Two projects would involve the erection of structures associated with equine facilities including horse stables, animal enclosures, and pastures, as well as related infrastructure including parking lots, driveways, fences, and buildings.
2. In order to account for an average deduction of setbacks, single-family homes, other accessory uses, and driveways, 0.5-acre was removed from every qualifying property.
3. It was assumed that all qualifying properties 5 acres or less would be completely built out, and all qualifying properties over 5 acres would disturb 5 acres (the maximum allowed under Tier Two).
4. Lands that would not be affected by this project were removed, including tribal lands, institutional, trans/communication/utilities, airports, shopping centers, education, parks, and open space easement and conservation lands.
5. Lands containing slopes of 25% or more were removed because equine uses tend to be located on relatively flat or gently sloping land.

Under this scenario, the maximum ground disturbance for the entire County under Tier One and Tier Two would be a total of 113,941 acres. It should be noted that the ground-disturbance footprint does not include design parameters associated with barriers such as trees and bluffs that are considered on a site-specific basis.

Although equine facilities would be permitted as accessory structures and are uses that are generally compatible with agricultural lands, the ground-disturbing activities may result in conversion of Important Farmlands and could limit the ability for future agricultural use. Thus, the adoption of the proposed Zoning Ordinance amendment may result in **potentially significant impacts** related to conversion of farmland (**AG-1**).

Tier Three and Tier Four

Future equine facilities under Tier Three and Tier Four would be subject to discretionary review. As part of the County's discretionary review process, these projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to Important Farmlands, as necessary. CEQA requires proposed projects to provide detailed information on the potentially significant environmental effects they are likely to have, to propose mitigation measures to minimize potentially significant environmental effects, and possibly identify alternatives that would reduce or avoid the significant impacts identified for the proposed project. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and required to implement feasible mitigation measures. However, as there is ultimately no guarantee on a project-specific level that mitigation measures will reduce impacts to a level below significant, the proposed project may result in **potentially significant impacts** related to conversion of farmland (**AG-2**).

2.2.3.2 Agricultural Zoning and Williamson Act Contracts

Guidelines for Determination of Significance

The following significance guideline from Appendix G of the California Environmental Quality Act (CEQA) Guidelines applies to the direct and indirect impact analysis, as well as the cumulative impact analysis.

A significant impact would result if:

- The project will conflict with existing zoning for agricultural use, or a Williamson Act contract.

Analysis

Figure 2.2-1 depicts agricultural lands within the project area and Figure 2.2-2 depicts project area lands with Williamson Act contracts. The proposed project would allow development of equine facilities on sites with agricultural zones and Williamson Act contracts.

Tier One and Tier Two

As described in Section 2.2.3.1, a worst-case ground-disturbance scenario was developed. Under this scenario the maximum ground disturbance for the entire County under Tier One and Tier Two would be a total of 113,941 acres. Of this potential worst-case ground-disturbance area, 44,444 acres are designated with agricultural zoning. Equine uses allowed pursuant to the proposed Zoning Ordinance Amendment are allowed in agricultural zones in the County. Equine uses currently in operation in the County are usually accessory to active agricultural uses and can be important for agricultural uses, for example as a means of transportation around a property. Underlying agricultural zones and animal designators for equine uses tend to be in the same areas due to rural character and large lot size. Therefore, equine uses would not conflict with zoning for agricultural use and impacts would be **less than significant**.

Similarly, these future equine uses are not expected to conflict with Williamson Act contracts. Approximately 69,521 acres of the maximum potential ground disturbance area are in a Williamson Act contract. Most Williamson Act contracts specifically indicate that equine uses are allowed. In rare situations for some projects, the Williamson Act contract may need to be reviewed and/or modified to allow additional equine uses; however, this would be determined on a case-by-case basis and would not conflict with an agricultural use on a property. Therefore, Tier One and Tier Two equine facilities would result in **less than significant** impacts related to a conflict with the Williamson Act contracts.

Tier Three and Tier Four

Similar to Tier One and Tier Two uses, future equine uses under Tier Three and Tier Four allowed pursuant to the proposed Zoning Ordinance Amendment are allowed in agricultural zones in the County. Equine uses currently in operation in the County are usually accessory to active agricultural uses and can be important for agricultural uses, for example as a means of transportation around a property. Underlying agricultural zones and animal designators for equine uses tend to be in the same areas due to rural character and large lot size. Therefore, equine uses would not conflict with zoning for agricultural use.

Future equine uses under Tier Three and Tier Four are not expected to conflict with Williamson Act contracts. Most Williamson act contracts specifically indicate that equine uses are allowed. In rare situations for some projects, the Williamson Act contract may need to be reviewed and/or modified to allow additional equine uses; however, this would be determined on a case-by-case basis and would not conflict with an agricultural use on a property. Therefore, these future equine uses would not conflict with a Williamson Act contract.

Additionally, future Tier Three and Tier Four equine uses would be subject to the County's discretionary review process and would be evaluated under CEQA. CEQA requires proposed projects to provide detailed information on the potentially significant environmental effects they are likely to have, to propose mitigation measures to minimize potentially significant environmental effects, and possibly identify alternatives that would reduce or avoid the significant impacts identified for the proposed project. As part of the County's discretionary review process, all future equine facilities would be evaluated under CEQA and required to implement feasible mitigation measures, as necessary. Because future equine uses would not conflict with agricultural zoning or the Williamson Act as described above, impacts would be **less than significant**.

2.2.3.3 *Forest or Timberland Conflicts*

Guidelines for Determination of Significance

The following significance guideline from Appendix G of the CEQA Guidelines applies to the direct and indirect impact analysis, as well as the cumulative impact analysis. A significant impact would result if:

- The project will conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code, Section 12220(g)), timberland (as defined by Public Resources Code, Section 4526), or timberland zoned Timberland Production (as defined by Government Code, Section 51104(g)).

Analysis

The County does not include lands zoned specifically for forest land, timberland, or timberland zoned Timberland Production. Moreover, the County does not have timberland or Timberland Production Zones. State parks and national forests, which support forest lands, comprise many areas of the unincorporated County, including the CNF. The CNF is primarily under the land use jurisdiction of the USFS, not the County. However, many areas within the County's jurisdiction may contain forest resources.

Tier One and Tier Two

The County does not have zoning for forest land, timberland, or Timberland Production Zones and there is no other means of quantifying the location of forest lands within the County. The proposed equine facilities would be permitted as accessory structures and would not require a zone change for its use. Therefore, the proposed project **would not result in significant impacts** related to forest land or timberland conflicts as a result of the construction and implementation of equine facilities.

Tier Three and Tier Four

The County does not have zoning for forest land, timberland, or Timberland Production Zones, and there is no other means of quantifying the location of forest lands within the County. Similar to Tier One and Tier Two uses, future equine uses under Tier Three and Tier Four would be permitted as accessory structures and would not require a zone change. Additionally, future Tier Three and Tier Four equine facilities would be subject to discretionary review. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and would be required to implement measures to minimize impacts related to conflicts with forest land or timberland, as necessary. Therefore, the proposed project **would not result in significant impacts** related to forest land or timberland conflicts as a result of the construction and implementation of equine facilities.

2.2.3.4 Loss or Conversion of Forest Land

The following significance guideline from Appendix G of the CEQA Guidelines applies to the direct and indirect impact analysis, as well as the cumulative impact analysis. A significant impact would result if:

- The project will result in the loss of forest land or conversion of forest land to non-forest use.

Analysis

Forest land is defined by the Public Resources Code as land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. These lands are not designated or mapped, but can occur in many areas throughout the County. Site-specific analysis would be needed to determine if an area qualifies as forest land. Given the extent of the project area, it may include areas that might be considered forest land in the County. The proposed project would allow development of equine facilities that could adversely affect forest land through ground-disturbing activities, such as excavation and grading, which have the potential to convert forest lands to non-forest use within the above mentioned Animal Designations.

Tier One and Tier Two

As described in Section 2.2.3.1, a worst-case ground-disturbance scenario was developed. Under this scenario the maximum ground disturbance for the entire County under Tier One and Tier Two would be a total of 113,941 acres. However, because forest lands are not designated or mapped within the County, the potential disturbance of forest land based on the worst-case ground-disturbance scenario could not be quantified at this time.

Although equine facilities would be permitted as accessory structures and they are generally compatible with forest land, the ground-disturbing activities may result in loss or conversion of forestland. Thus, the adoption of the proposed Zoning Ordinance Amendment may result in **potentially significant impacts** related to loss or conversion of forest land (**AG-3**).

Tier Three and Tier Four

Future equine facilities would be subject to discretionary review. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to forest lands, as necessary. CEQA requires proposed projects to provide detailed information on the potentially significant environmental effects they are likely to have, to propose mitigation measures to minimize potentially significant environmental effects, and possibly identify alternatives that would reduce or avoid the significant impacts identified for the proposed project. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and required to implement feasible mitigation measures, as necessary. However, as there is ultimately no guarantee on a project-specific level that mitigation measures will reduce impacts to a level below significant, the proposed project may result in **potentially significant impacts** related to loss or conversion of forest land (**AG-4**).

2.2.3.5 Indirect Conversion of Farmland or Forest Land

Guidelines for Determination of Significance

The following significance guideline from Appendix G of the CEQA Guidelines applies to the direct and indirect impact analysis, as well as the cumulative impact analysis. A significant impact would result if:

- The project will involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Analysis

The proposed project would allow development of equine facilities that may result in other changes in the existing environment that would result in the indirect conversion of Important Farmland or forest land.

Tier One and Tier Two

Although future equine facilities developed under Tier One and Tier two would have the potential to directly convert Important Farmland or forestland due to ground disturbance as

described in Sections 2.2.3.1 and 2.2.3.4, there are no other associated changes to the environment that are anticipated to indirectly convert farmland or forest land. Future equine facilities developed under Tier One and Tier Two would not require major infrastructure or road improvements that might potentially convert farmland or forest land within the project area. Additionally, equine uses are generally compatible with agricultural and forest land uses and would not dramatically change the existing environment such that indirect impacts would occur. As such, impacts related to the indirect conversion of Important Farmland or forest land would be **less than significant**.

Tier Three and Tier Four

As described in Section 2.2.3.1, future equine facilities developed under Tier Three and Tier Four have the potential to result in the direct conversion of Important Farmland or forest land due to ground-disturbing activities. However, equine uses are generally compatible with agricultural and forest land, and other associated changes are not anticipated to result in the indirect conversion of Important Farmland or forest land. Future equine development would be compatible with surrounding agricultural uses. Additionally, future Tier Three and Tier Four equine facilities would be subject to discretionary review. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and would be required to implement feasible mitigation measures, as necessary. Therefore, impacts related to the indirect conversion of farmland or forest land due to other changes associated with the proposed project would be **less than significant**.

2.2.4 Cumulative Impact Analysis

For the purpose of this EIR, the geographic scope for the cumulative analysis of agricultural resources includes the San Diego region, which encompasses the entire County, including both incorporated and unincorporated areas, as well as surrounding counties, and tribal and public lands.

2.2.4.1 Conversion of Farmland

Within the San Diego region, the indirect conversion of farmland is increasing due to population growth and the subsequent development required in order to support the population growth. Cumulative projects that would have the potential to result in adverse impacts to farmland include, but are not limited to, development of the General Plan update and the development of land uses as designated under surrounding jurisdictions general plans. These projects are regulated by federal, state, and local regulations. Important Farmland may occur on tribal lands and be affected by tribal projects. Tribal projects may not adhere to state or local regulations and could result in cumulatively considerable impacts to agricultural resources.

Tier One and Tier Two

Although equine facilities would be permitted as accessory structures on designated farmland and are uses that are generally compatible with agricultural lands, the amount of ground-disturbing activities may result in permanent conversion of Important Farmlands to a non-agricultural use and could limit the ability for future agricultural use. Pursuant to the worst-case ground-disturbance scenario, approximately 33,486 acres are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland) that could potentially be impacted by the project. Combined with other cumulative projects as described above, the proposed project may result in **a cumulatively considerable impact** related to conversion of farmland (AG-5).

Tier Three and Tier Four

Tier Three and Tier Four equine uses would be subject to discretionary review. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and required to implement feasible mitigation measures. However, as there is ultimately no guarantee on a project-specific level that mitigation measures would reduce impacts to a level below significant, the proposed project may result in **a cumulatively considerable impact** related to conversion of farmland (AG-6).

2.2.4.2 Agricultural Zoning and Williamson Act Contracts

Within the San Diego region, incorporated cities and surrounding counties designate and adopt agricultural preserves, enter into Williamson Act contracts, and adopt agricultural zoning to protect their agricultural resources. With these regulations in place, cumulative projects occurring in the San Diego region, such as development allowable under surrounding jurisdictions' general plans, would not result in conflicts with existing agricultural zoning or Williamson Act contracts. However, some projects within the County and within adjacent jurisdictions can include zoning amendments or disestablishment of Williamson Act contracts, thereby creating cumulatively considerable impacts related to zoning and Williamson Act conflicts.

Tier One and Tier Two

The proposed project would allow equine facilities to be developed on a legal lot as an accessory use to the primary use of the property without discretionary review. Equine facilities would not preclude agricultural operations on agriculturally zoned lands or lands entered into Williamson Act contracts as they are considered compatible uses with agricultural uses. Therefore, in combination with other past, present, and foreseeable future projects, the proposed project **would not contribute to a cumulatively considerable impact** related to conflicts with agricultural zoning and Williamson Act contracts.

Tier Three and Tier Four

Similar to Tier One and Tier Two, equine facilities would not preclude agricultural operations on agriculturally zoned lands or lands entered into Williamson Act contracts as they are considered compatible uses with agricultural uses. Therefore, in combination with other past, present, and foreseeable future projects, the proposed project **would not contribute to a cumulatively considerable impact** related to conflicts with agricultural zoning and Williamson Act contracts.

2.2.4.3 Forest or Timberland Conflicts

The focused project area does not include lands zoned specifically for forestry, and cumulative projects would, therefore, not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or Timberland Production.

Tier One and Tier Two

The County does not include lands zoned specifically for forest land, timberland, or Timberland Production. Tier One and Tier Two equine facilities would not conflict with lands zones specifically for forestry. Thus, the project **would not contribute to a cumulatively considerable impact** related to zoning for forest land and timberland.

Tier Three and Tier Four

As stated above, the County does not include lands zoned specifically for forest land, timberland, or Timberland Production. Therefore, in combination with other past, present, and foreseeable future projects, the project **would not contribute to a cumulatively considerable impact** related to zoning for forest land and timberland.

2.2.4.4 Loss or Conversion of Forest Land

Forest land, as defined by the Public Resources Code, can occur in many areas throughout the County. Cumulative projects that would have the potential to result in adverse impacts to forest land include, but are not limited to, development of the County's General Plan Update and the development of land uses as designated under surrounding jurisdictions general plans. Forest lands may also occur on tribal lands and be affected by tribal projects such as casino expansions.

Tier One and Tier Two

As described in Section 2.2.3.4, although equine facilities would be permitted as accessory structures, and they are generally compatible with forest land, the ground-disturbing activities may result in loss or conversion of forest land. Therefore, in combination with other past,

present, and foreseeable future projects, the proposed project may result in a **cumulatively considerable impact** related to loss or conversion of forest land (AG-7).

Tier Three and Tier Four

Future equine facilities would be subject to discretionary review. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and required to implement feasible mitigation measures. However, as there is ultimately no guarantee on a project-specific level that mitigation measures would reduce impacts to a level below significant, the proposed project may result in a **cumulatively considerable impact** related to loss or conversion of forest land (AG-8).

2.2.4.5 Indirect Conversion of Farmland or Forest Land

Conversion of Farmland

Within the San Diego region, the indirect conversion of farmland is increasing due to population growth and the subsequent development required in order to support the population growth. Cumulative projects that would have the potential to result in adverse indirect impacts to farmland or forest land include, but are not limited to, development of the General Plan Update and the development of land uses as designated under surrounding jurisdictions general plans.

Tier One and Tier Two

As described in Section 2.2.3.5, future Tier One and Tier Two equine facilities developed under Tier One and Tier Two would not involve other changes to the existing environment, which would result in the indirect conversion of Important Farmland or forest land. Therefore, in combination with other past, present, and foreseeable future projects, the proposed project would not **contribute to a cumulatively considerable impact** related to indirect conversion of farmland or forest land.

Tier Three and Tier Four

As described in Section 2.2.3.5, future Tier Three and Tier Four equine facilities are consistent with agricultural uses and would not result in other changes to the existing environment, which would have the potential to result in the indirect conversion of Important Farmland or forest land. Additionally, as part of the County's discretionary review process, all future projects would be evaluated under CEQA and would be required to implement feasible mitigation measures, as necessary. The proposed project **would not contribute to a cumulatively considerable impact** related to indirect conversion of farmland or forest land.

2.2.5 Significance of Impacts Prior to Mitigation

The proposed project would result in potentially significant impacts associated with agricultural resources, including conversion of farmland (**AG-1, AG-2, AG-5, and AG-6**) and conversion of forest lands (**AG-3, AG-4, AG-7, and AG-8**) prior to mitigation due to the development of equine facilities. The project would not result in significant impacts related to conflicts with agricultural zoning/Williamson Act contracts or forest/timberland zoning.

2.2.6 Mitigation Measures

2.2.6.1 Conversion of Farmland

The proposed project would allow for development of equine facilities under Tier One and Tier Two with no discretionary review, Tier Three with an Administrative Permit, and Tier Four with a Major Use Permit (MUP) that would have potentially significant adverse effects on farmland (**AG-1, AG-2, AG-5, and AG-6**). Mitigation measures (described below) have been identified that would reduce potentially significant impacts to farmland as a result of Tier Three and Tier Four facilities, but not below a significant level.

Mitigation Measures

MAG-1: During the environmental review process for future Administrative Permits or Major Use Permits for equine facilities under Tier Three or Tier Four, respectively, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of agricultural resources; preservation of agriculture; and inclusion of compatibility buffers near areas intended for agricultural uses.

Infeasible Mitigation Measures

The following measure was considered in attempting to reduce direct and cumulative impacts associated with conversion of farmland within the County to below a level of significance. However, it has been determined that this measure is infeasible for reasons described as follows. Therefore, this measure would not be implemented.

- Prohibit construction of equine facilities on areas supporting Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance. This measure would be infeasible because such farmland may be located within or adjacent to the Animal Designator D–J, L–N, U, V, or X in which the County has land use jurisdiction, in which

equine uses are considered to be accessory structures that could be constructed without permits. This prohibition would conflict with the project objectives to streamline the permitting process for equestrian facilities in order to better facilitate the development of such uses within the County and to protect and promote equestrian operations.

As it cannot be concluded at this stage that impacts related to conversion of farmland from equine facilities under the proposed Zoning Ordinance Amendment would be avoided or mitigated, impacts AG-1, AG-2, AG-5, and AG-6 would remain **significant and unavoidable**. Chapter 4, Project Alternatives, provides a discussion of alternatives to the proposed project that would result in some reduced impacts associated with conversion of farmland as compared to the proposed project.

2.2.6.2 Agricultural Zoning and Williamson Act Contracts

The proposed project would not result in potentially significant impacts related to agricultural zoning and Williamson Act contracts; therefore, no mitigation measures are required.

2.2.6.3 Forest or Timberland Conflicts

The proposed project would not result in potentially significant impacts related to forest or timberland zoning conflicts; therefore, no mitigation measures are required.

2.2.6.4 Loss or Conversion of Forest Land

The proposed project would allow for development of equine facilities under Tier One and Tier Two with no discretionary review, Tier Three with an Administrative Permit, and Tier Four with an MUP that would have potentially significant adverse effects on forest land (**AG-3, AG-4, AG-7, and AG-8**). Mitigation measures (described below) have been identified that would reduce potentially significant impacts to forest land, but not below a significant level.

Mitigation Measures

M AG-2: During the environmental review process for future Administrative Permits or Major Use Permits for equine facilities under Tier Three and Tier Four, respectively, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include avoidance of sensitive resources, preservation of habitat, revegetation, and resource management.

Infeasible Mitigation Measures

The following measure was considered in attempting to reduce direct and cumulative impacts associated with the conversion of forest land within the County to below a level of significance. However, it has been determined that this measure is infeasible for reasons described as follows. Therefore, this measure would not be implemented.

- Prohibit construction of equine facilities on or near areas supporting forest land. This measure would be infeasible because forest land may be located within or adjacent to the Animal Designator D–J, L–N, U, V, or X in which the County has land use jurisdiction, in which equine uses are considered to be accessory structures that could be constructed without permits. This prohibition would conflict with the project objectives to streamline the permitting process for equestrian facilities in order to better facilitate the development of such uses within the County and to protect and promote equestrian operations.

As it cannot be concluded at this stage that impacts related to loss of conversion of forest land from equine facilities under the proposed Zoning Ordinance Amendment would be avoided or mitigated, impacts AG-3, AG-4, AG-7, and AG-8 would remain **significant and unavoidable**. Chapter 4, Project Alternatives, provides a discussion of alternatives to the proposed project that would result in some reduced impacts associated with the loss or conversion of forest land as compared to the proposed project.

2.2.6.5 Indirect Conversion of Farmland or Forest Land

The proposed project would not result in potentially significant impacts related to the indirect conversion of farmland or forest land.

2.2.7 Conclusion

The following discussion provides a synopsis of the conclusion reached in each of the above impact analyses, and the level of impact that would occur after mitigation measures are implemented.

Conversion of Farmland

Development of the proposed project would potentially result in direct and cumulative impacts related to the conversion of farmland. Impacts would remain potentially significant and unavoidable. Future proposed equine facilities under Tier One and Tier Two may not be able to mitigate impacts (**AG-1** and **AG-5**) to a level below significant on an individual basis since they would not require discretionary review. Future equine facilities under Tier Three and Tier Four may be able to mitigate impacts (**AG-2** and **AG-6**) to a level below significant on an individual basis, although it cannot be guaranteed at this time.

Agricultural Zoning and Williamson Act Contracts

Development of the proposed project would not result in significant adverse effects related to conflicts with agricultural zoning and Williamson Act contracts.

Forest or Timberland Conflicts

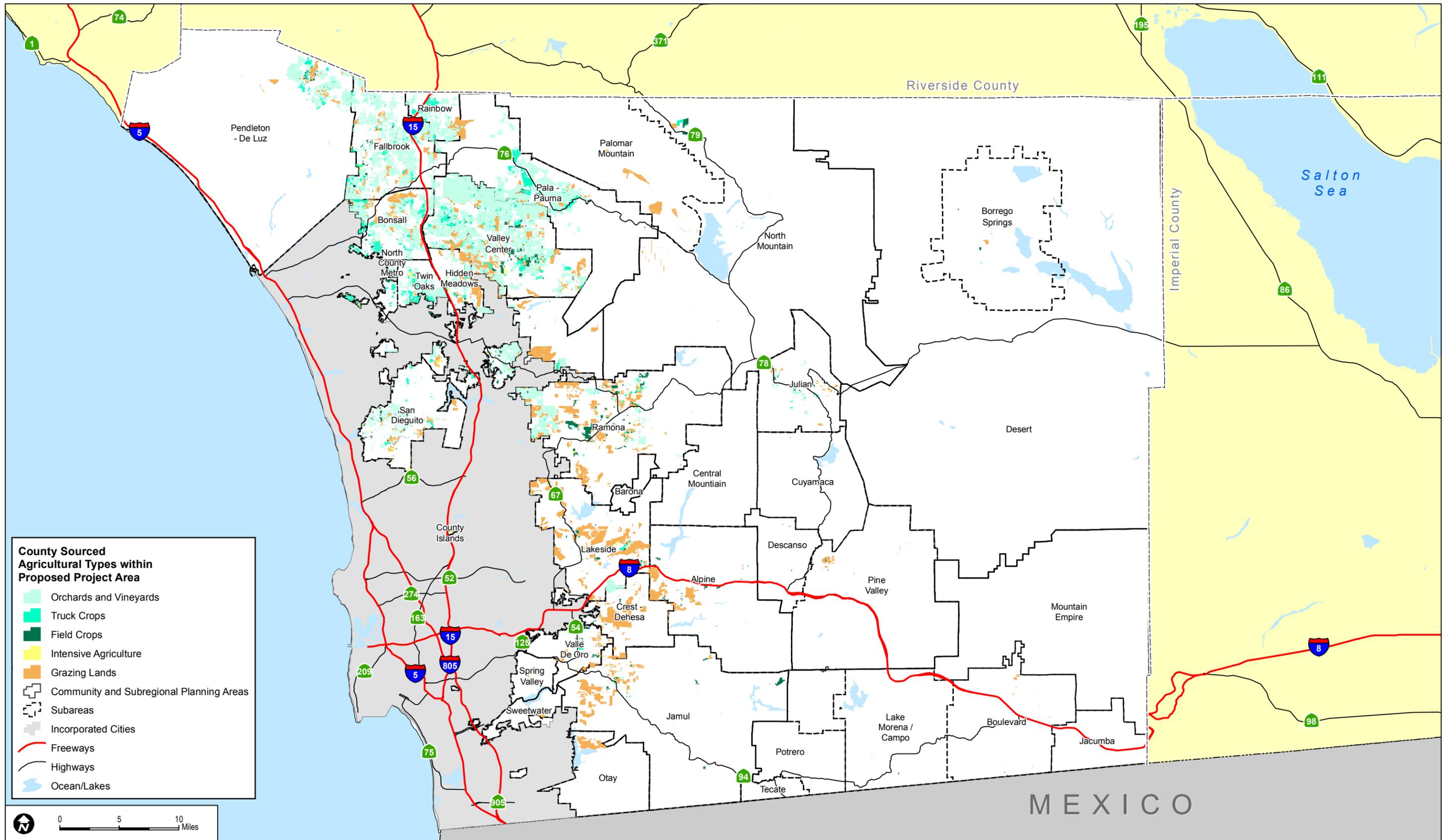
The proposed project would not result in any potentially significant impacts related to forest or timberland zoning.

Loss or Conversion of Forest Land

Development of the proposed project would potentially result in direct and cumulative impacts related to the loss or conversion of forest land. Impacts would remain potentially significant and unavoidable. Future proposed equine facilities under Tier One and Tier Two may not be able to mitigate impacts (**AG-3** and **AG-7**) to a level below significant on an individual basis since they would not require discretionary review. Future equine facilities under Tier Three and Tier Four may be able to mitigate impacts (**AG-4** and **AG-8**) to a level below significant on an individual basis, although it cannot be guaranteed at this time.

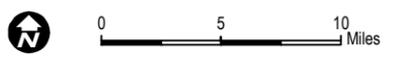
Indirect Conversion of Farmland or Forest Land

Development of the proposed project would not result in indirect impacts related to the conversion of farmland or forest land.



County Sourced Agricultural Types within Proposed Project Area

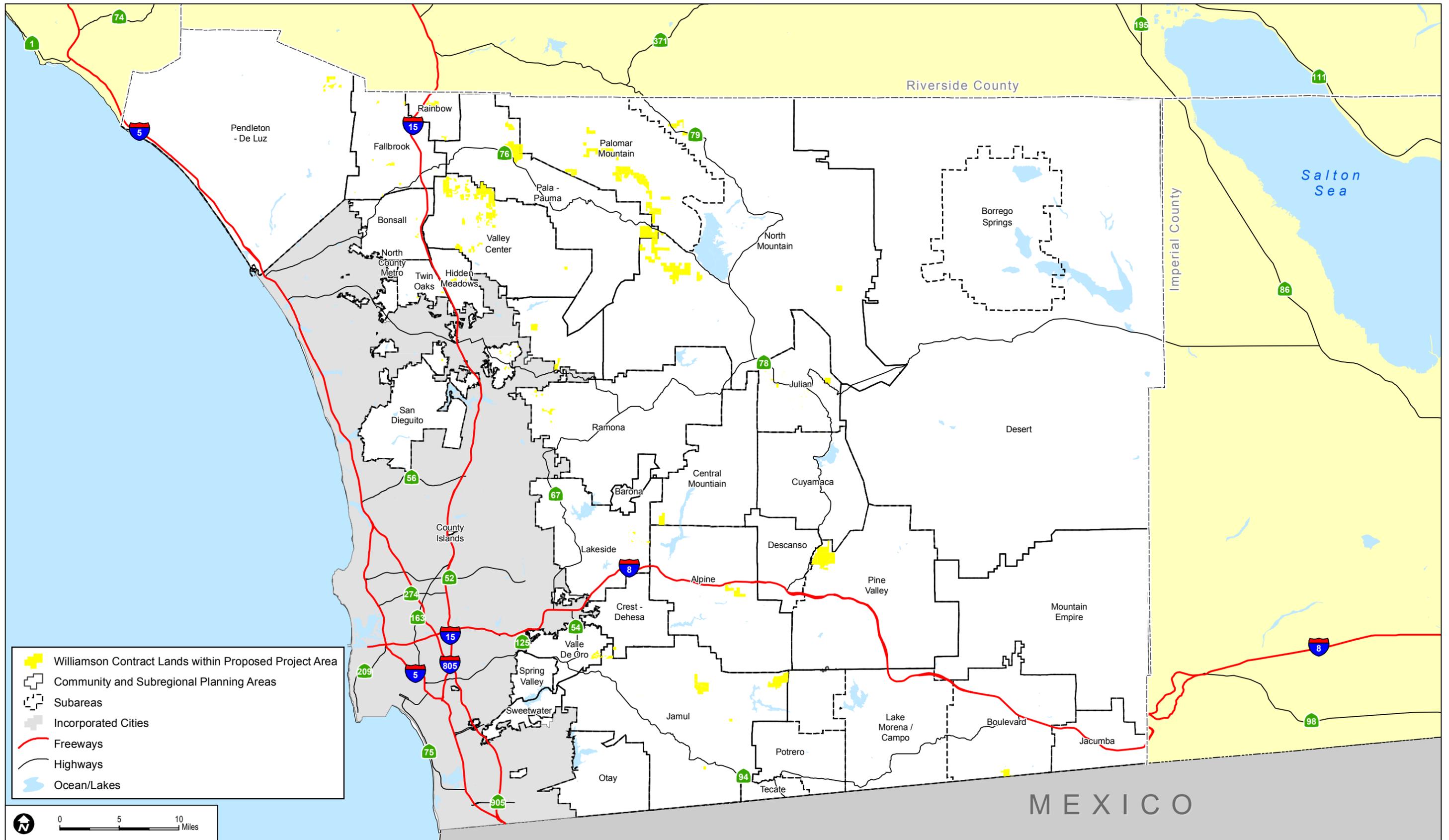
- Orchards and Vineyards
- Truck Crops
- Field Crops
- Intensive Agriculture
- Grazing Lands
- Community and Subregional Planning Areas
- Subareas
- Incorporated Cities
- Freeways
- Highways
- Ocean/Lakes



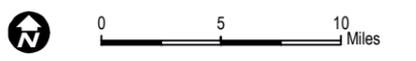
MEXICO

FIGURE 2.2-1
County Identified Agricultural Lands

INTENTIONALLY LEFT BLANK



-  Williamson Contract Lands within Proposed Project Area
-  Community and Subregional Planning Areas
-  Subareas
-  Incorporated Cities
-  Freeways
-  Highways
-  Ocean/Lakes



DUDEK

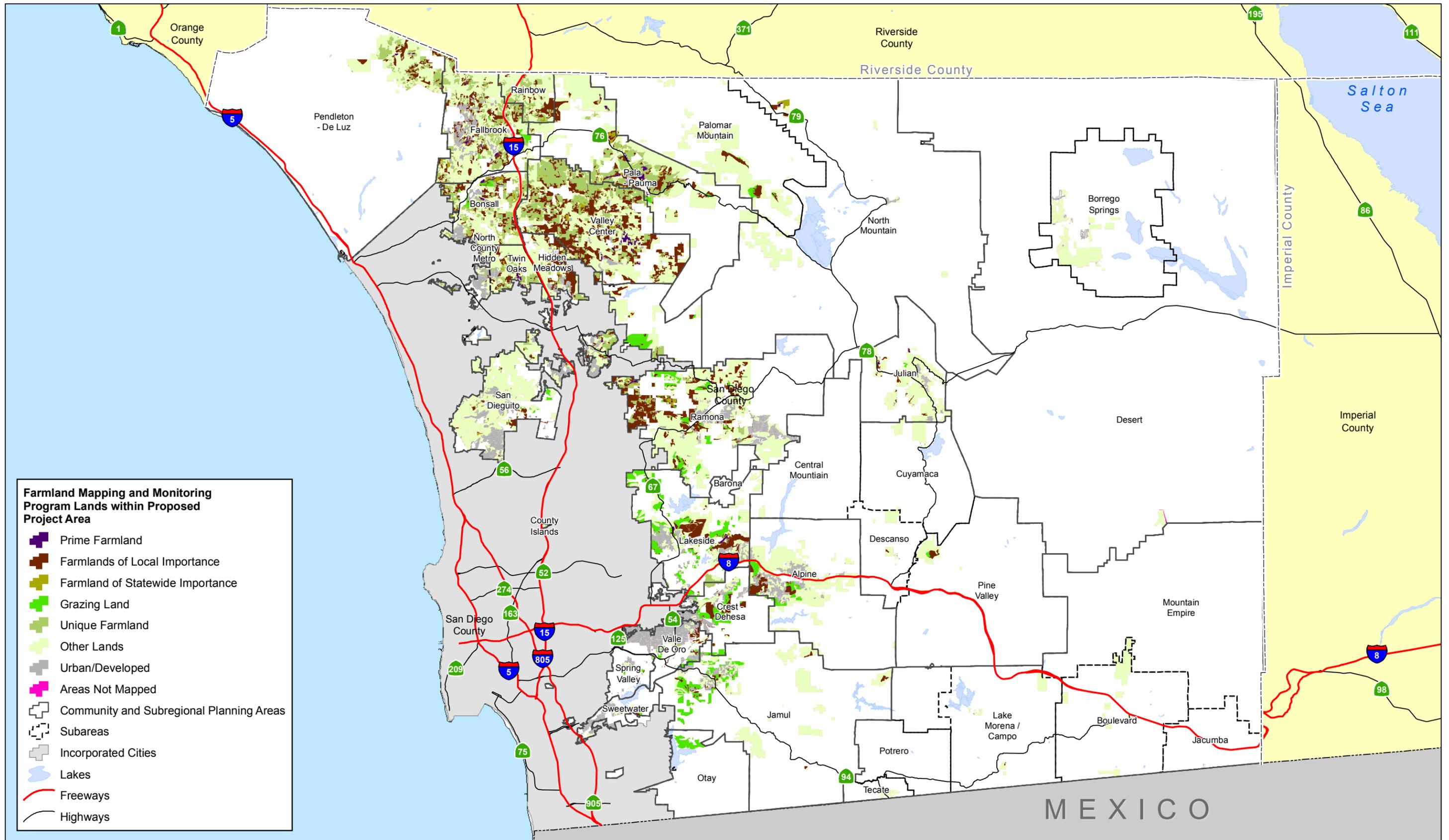
SOURCE: Dept. of Conservation 2008; County of San Diego 2008, 2011

6959

County Equine Ordinance EIR

FIGURE 2.2-2
Williamson Act Contract Lands

INTENTIONALLY LEFT BLANK



MEXICO

FIGURE 2.2-3
Farmland, Mapping and Monitoring Program Lands

INTENTIONALLY LEFT BLANK