

## **2.2 Agricultural and Forestry Resources**

This section of the SEIR evaluates existing conditions for agricultural and forestry resources within the Project areas.

### **2.2.1 Existing Conditions**

The General Plan Update PEIR included a discussion of existing conditions related to agricultural resources in Chapter 2.2.1 of the Agricultural Resources chapter, including the Project areas covered by this proposed Project. The agricultural resource conditions described in the PEIR are the same as the conditions on the ground today. No changes to the existing conditions have been identified that would alter the conclusions in the PEIR. All references used in the PEIR (Chapter 6) were reviewed to ensure they are still valid today. In addition, the existing conditions for agricultural resources within the Project areas analyzed in this SEIR are the same as those provided in the PEIR, and are hereby incorporated by reference.

#### **2.2.1.1 *Forestry Resources***

The U.S. Forest Service (USFS) defines a forested area as “forest land” if it is at least 1 acre in size and at least 10% occupied by forest trees of any size or formerly having had such tree cover and not currently developed for non-forest use. Non-forest uses may include cropland, pasturelands, residential areas, and other land uses. Forest land includes transition zones which are those “areas located between heavily forested and non-forested lands that are at least 10 percent stocked with forest trees, and forest areas adjacent to urban and built-up lands” (EPA 2013a).

The majority of federal forest land is managed as the National Forest System, which includes the following:

- National forest lands reserved from the U.S. public domain;
- National forest lands acquired through purchase, exchange, donation, or other means;
- National grasslands; and
- Other lands, waters, or interests administered by the USFS or designated for administration through the USFS as part of the system.

Furthermore, Section 12220(g) of the California Public Resources Code defines forest land 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.

“Timberland” is land owned by the federal government and designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Sections 51112 or 51113 (h) of the California Public

Resources Code defines “Timberland Production Zone” (TPZ) as land used for growing and harvesting timber and compatible uses.

The County of San Diego (County) does not include lands zoned specifically for forest land, timberland, or timberland production. The Cleveland National Forest (CNF) covers an extensive portion of the unincorporated County, including lands in Alpine, Central Mountain, Jamul–Dulzura, Julian, Mountain Empire, North Mountain, and Pendleton–De Luz. While the CNF lands are under the jurisdiction of the USFS, the private lands adjacent to and surrounding the CNF lands are under the County’s jurisdiction and therefore are included in the proposed Project.

## **2.2.2 Regulatory Framework**

Chapter 2.2 of the General Plan Update PEIR, pages 2.2-9 to 2.2-12, describe the Regulatory Framework related to agricultural resources and is here by incorporated by reference. The applicable Federal regulation discussed was the Farmland Protection Policy Act. Applicable State regulations discussed included the Right to Farm Act, California Land Conservation Act, California Farmland Conservancy Program (CFCP), Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Open Space Subdivision Act (OSSA), Farmland Mapping and Monitoring Program (FMMP), Farm and Ranch Lands Protection Program (FRPP), and the California Land Evaluation Site Assessment Model (LESA). Local regulations include the County of San Diego Code of Regulatory Ordinances Sections 63.401 through 63.407, Agricultural Enterprises and Consumer Information Ordinance, County of San Diego Board of Supervisors Policy I-38 (Agricultural Preserves) and Policy I-33 (Support and Encouragement of Farming in San Diego County), County of San Diego Farming Program, Agricultural Clearing Permit Requirements, and the Local Agricultural Resource Assessment (LARA) Model.

With the exception of the Cleveland National Forest (CNF) Land Management Plan and the update to California Environmental Quality Act (CEQA) Appendix G regarding forestry resources as described below, the regulatory framework discussion in the General Plan Update PEIR as pertains to agricultural resources has not changed since adoption of the General Plan in August 2011. Therefore, the remaining information in the General Plan Update PEIR relative to this section applies equally to the Project areas addressed in this SEIR, and is not repeated here.

### **2.2.2.1 Federal**

#### **Cleveland National Forest Land Management Plan**

Within San Diego County, CNF lands total approximately 402,434 acres. Management of these forest lands is facilitated through the CNF Land Management Plan. As identified in the Management Plan, the production of wood products, including fuel wood harvesting, is a suitable activity within all designated land use zones (note: fuel wood harvesting is suitable by exception within the Critical Biological and Wilderness land use zones) (USFS 2005).

**2.2.2.2 State**

Appendix G of the CEQA Guidelines

The Notice of Preparation (NOP) for the General Plan Update PEIR was released for publication on April 28, 2008. In 2009, Appendix G of the CEQA Guidelines was amended to include additional significance criteria to evaluate a project's potential impacts on forestry resources. As the amended significance criteria addressing forestry resources were not yet adopted at the time the NOP for the PEIR was released, an evaluation of potential impacts on forestry resources was not included in that EIR. As such, this section includes an analysis of proposed Project impacts to forestry and timberland resources.

**2.2.3 Analysis of Project Effects and Cumulative Impacts**

The cumulative impact analysis study area for agricultural resources in the General Plan Update PEIR was identified as the entire San Diego Region (Chapter 2.2). As the Proposed Project is applying 2011 General Plan Guiding Principles to assign land use designations for the Project areas, the cumulative study area for agricultural resources is the same as the PEIR and is hereby incorporated by reference. In addition, Section 1.9 of this SEIR (Cumulative Project Assessment Overview), provides an update of new projects since adoption of the 2011 General Plan that are considered in the cumulative analysis in order to make the analysis complete.

**2.2.3.1 Direct Conversion of Agricultural Resources**

This section describes direct and cumulative impacts resulting from the conversion of agricultural resources to other land uses, for the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Agricultural Resources, the proposed Project would have a significant impact if it would directly convert San Diego County Agricultural Resources (including, but not limited to, Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, pursuant to the FMMP of the California Resources Agency), or other agricultural resources, to non-agricultural use. A significant impact would also occur if the proposed Project would substantially impair the ongoing viability of important agricultural resources.

Analysis

The General Plan Update PEIR evaluated impacts from the adoption of the 2011 General Plan countywide and concluded that buildout of the 2011 General Plan would result in potentially significant direct and cumulative impacts with regard to the conversion of agricultural lands in the unincorporated County. This discussion of impacts can be found in Section 2.2.3.1, page 2.2-12 of the PEIR and is hereby incorporated by reference. PEIR found that impacts would be reduced, although not to below a level of significance, through the implementation of a

combination of federal, State, and local regulations (e.g., County Zoning Ordinance, Resource Protection Ordinance, design review guidelines); existing County regulatory processes; the adopted 2011 General Plan goals and policies; and, specific mitigation measures/implementation programs identified in the General Plan Update PEIR.

Consistent with the General Plan Update PEIR, the definition of an agricultural resource has been broadened from the FMMP definition to include any land with an active agricultural operation, or any site with a history of agricultural production based on aerial photography or other data sources. Within the Project area, there are 5,909 acres of County identified agricultural lands and 5,904 acres of FMMP lands. Refer to Tables 2.2-1 and 2.2-2 for a summary of County Identified Agricultural Lands and Impacts Estimates and FMMP Lands within the Project area. In addition, refer to Figures 2.2-1A and 2.2-1B for the location of County Identified Agricultural Lands in relation to the Project area.

For the purpose of this analysis, the same assumptions used to evaluate direct impacts to agricultural resources are applied to determine impacts associated with the proposed Project. Section 2.2.3.1, page 2.2-12, of the General Plan Update PEIR discusses the impact assumptions for each land use designation category and is hereby incorporated by reference. A summary of the impact assumptions used in the PEIR is provided in Table 2.2-1. Specifically, the PEIR assumed 100% impact for lands designated Village Residential, Village Core Mixed Use and Rural Commercial. For lands with Semi-Rural and Rural designations, 1.5 acres of impact per unit is assumed. No impacts are assumed on lands designated Specific Planning Area, Open Space, Public/Semi-Public Facilities, and Tribal Lands for the reasons discussed in the PEIR. The same assumptions are used to determine direct impacts to agricultural resources as a result of the FCI GPA.

A majority of the agricultural resources within the Project area are located on Semi-Rural and Rural land use designations. While these lands are generally considered compatible for agricultural resources, development of these lands could result in conversion of agricultural land to a non-agricultural use. Of the 5,909 acres of agricultural resources within the Project area, 5,616 acres are proposed for rural land use designations. Therefore, approximately 95.0% of all County designated agricultural land within the Project area would be designated rural lands, which would be the most compatible land use with agricultural operations.

The direct conversion of 48.5 acres of agricultural resources to non-agricultural land uses due to the proposed Project would be considered a significant impact. Such impacts would also be cumulative in nature as they would contribute to the County-wide conversion of agricultural resources to non-agricultural land uses, when combined with other development allowed under the 2011 General Plan. As such, the proposed Project's contribution to this significant cumulative impact would be cumulatively considerable.

The proposed Project's significant direct and cumulative impacts associated with the conversion of agricultural resources to non-agricultural land uses would be reduced by the same regulations,

implementation programs (2011 General Plan goals/policies), and mitigation measures from the General Plan Update PEIR (and repeated in Section 2.2.4.1 in this SEIR).

These mitigation measures would apply to any future development within the Project area; however, even with these programs and measures in place, the impacts would not be reduced to below a level of significance due to the infeasibility of mitigation measures as discussed in Section 2.2.4.1 in this SEIR (Direct Conversion of Agricultural Resources). Therefore, implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to conversion of agricultural lands.

### **2.2.3.2 Conflicts with Agricultural or Forest Lands**

This section describes potential direct and cumulative impacts as the result of land use conflicts between agricultural or forest lands and other adjacent land uses relative to the Project areas addressed in this SEIR.

#### **Guidelines for the Determination of Significance**

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Agricultural Resources, the proposed Project would have a significant impact if it would conflict with a Williamson Act Contract. Additionally, a significant impact would occur if the proposed Project would conflict with existing zoning for agricultural use or 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 areas zoned for Timberland Production (as defined by Government Code, Section 51104(g)).

#### **Analysis**

##### **Agricultural Lands**

The General Plan Update PEIR evaluated impacts from the adoption of the 2011 General Plan countywide, with the exception of land use designations on former FCI lands, and concluded that buildout of the Plan would result in a potentially significant impact to Williamson Act Contract Lands due to the removal of non-contracted lands from County adopted Agricultural Preserves. Specifically, the 2011 General Plan included an implementation measure (5.3.1.E) to remove non-contracted lands from County adopted Agricultural Preserves and remove the “A” designator from these lands. By removing lands from a preserve at the boundary of a Contract area, the PEIR found that potentially significant indirect impacts with regard to land use conflicts would occur, potentially allowing incompatible development near Williamson Act Contract lands and exposing these lands to surrounding development pressures. Refer to Chapter 2.2 of the General Plan Update PEIR, page 2.2-20, for a detailed discussion of the potential conflicts related to Williamson Act Contracts.

The Project area has a total of approximately 33,285 acres of Agricultural Preserves and approximately 21,598 acres of land under Williamson Act Contracts. As 2011 General Plan

Implementation measure 5.3.1.E was implemented in the entire unincorporated area, including FCI lands, the “A” Special Area Designator would be removed from approximately 10,855 acres of non-contracted land within the Project area as a result of 2011 General Plan Implementation. Removal of non-contracted land from Agricultural Preserves and the associated “A” Zoning Designators on land adjacent to Williamson Act Contracts could allow incompatible development and result in the potential conversion of Williamson Act contracted lands. The “A” Designator would not be removed from lands currently under Williamson Act Contract. Refer to Figure 2.2-2A and Figure 2.2-2B for the location of Agricultural Preserves and Figure 2.2-3A and Figure 2.2-3B for the location of Williamson Act Contract Lands within the Project areas.

Indirect impacts related to land use conflicts between agricultural lands and incompatible adjacent land uses would occur because removal of the “A” Designator within certain Project areas could allow development of new incompatible land uses adjacent to existing Williamson Act contracted lands, Agricultural Preserves, or agricultural operations. Development of land uses incompatible Williamson Act Contracts could result in potential indirect conversion of these lands. As a result, future development under the proposed Project would have the potential to result in potentially significant impacts related to agricultural zoning and/or lands under Williamson Act Contracts.

The General Plan Update PEIR found that indirect impacts would be reduced to below a level of significance through the implementation of a combination of federal, State, and local regulations, implementation of 2011 General Plan goals and policies and mitigation measures. As the proposed Project would result in the same types of impacts analyzed in the PEIR, the proposed Project impacts would be reduced to below a level of significance by the same regulations and implementation programs (2011 General Plan goals/policies) from the General Plan Update PEIR (and repeated in Section 2.2.4.2 in this document).

The 2011 General Plan contains goals and policies in the Land Use and Conservation and Open Space Elements that would reduce agricultural land use conflicts. The relevant policies are LU-7.1 and COS-6.3. These policies require lower density development designations, and siting of compatible recreational and open space uses in agricultural areas. Adherence to these policies will reduce potential land use conflicts with Williamson Act Contract lands because it will ensure that lands adjacent to Contract lands will either have low intensity development, or open space uses.

Impacts would also be cumulative in nature as they would contribute to County-wide conflicts between urban and agricultural land uses when combined with other development allowed under the General Plan; however, within the San Diego region, incorporated cities and surrounding counties also designate and adopt Agricultural Preserves, and enter into Williamson Act Contracts to protect their agricultural resources. Implementation of these regulations would reduce the potential for cumulative projects resulting in conflicts with adjacent lands that are zoned for agricultural use or Williamson Act Contracts. As such, cumulative impacts related to potential conflicts between urban uses and existing agricultural zoning or Williamson Act

Contracts are not considered to be significant on a regional basis. Therefore, the proposed Project would not result in a significant cumulative impact with respect to this issue.

**Forest Lands**

Since the certification of the General Plan Update PEIR, the CEQA Guidelines Appendix G agricultural resources questions were expanded to include impacts to forest lands. Since this component was added to Appendix G after the certification, potential impacts to forestry resources were not analyzed. In order to adequately analyze potential impacts of the proposed Project, an analysis of forest lands within the Project area has been provided.

Portions of the proposed Project area are densely vegetated with tree cover and within the jurisdiction of the County. “Forest land” is defined 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. Given this definition, the proposed Project area includes approximately 14,320 acres of forest vegetation and 14,291 acres of woodland vegetation, for a total of 28,611 acres of forest resources. These resources are identified based on the Holland Code categories used to categorize Biological Resources, specifically the project acreage that is identified within the 7000-Woodland and 80000-Forest categories, are included. Figures 2.4-1A and 2.4-1B in the Biological Resources chapter of this SEIR show the location of forest and woodland resources within the Project area. Although these 28,611 acres meet the definition of forest land, the County does not specifically identify any jurisdictional land as forest land.

“Timberland,” as defined by Public Resources Code Section 4526, is land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a 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. “Timberland Production Zones,” as defined by Government Code Section 51104 (g), are lands that have been zoned pursuant to Section 51112 or 51113 and are devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. There are no lands within the County of San Diego that are designated as timberland or timberland production zones.

The County does not specifically identify any jurisdictional land as forest land through zoning, therefore the proposed Project would not conflict with existing zoning for, or cause rezoning of forest land. As the County maintains no specific zoning for forest lands, there would also be no cumulative contribution to County-wide conflicts between urban and forest lands, and loss of forest land, when combined with other development allowed under the 2011 General Plan.

### **2.2.3.3 *Indirect Conversion of Agricultural Resources***

This section describes potential indirect and cumulative impacts from the conversion of agricultural resources relative to the Project areas addressed in this SEIR.

#### **Guidelines for the Determination of Significance**

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Agricultural Resources, the proposed Project would have a significant impact if it would involve other changes in the existing environment which, due to their location or nature, could result in conversion of a San Diego County agricultural resource to non-agricultural use (i.e., if proposed land uses result in compatibility conflicts with existing agricultural activities, causing the subsequent conversion of agricultural resources to non-agricultural use).

#### **Analysis**

The General Plan Update PEIR evaluated impacts from the adoption of the 2011 General Plan countywide with the exception of FCI lands, and concluded that buildout of the 2011 General Plan would result in potentially significant indirect and cumulative impacts related to the indirect conversion of agricultural resources in the unincorporated County. The PEIR found that land uses proposed near an active agricultural use would have the potential to cause the conversion of agricultural resources to non-agricultural uses because of the potential incompatibility between the proposed use and existing agricultural activity. Adverse impacts caused by incompatible development near agricultural uses would include, but would not be limited to, farm practice complaints; pesticide use limitations; liability concerns; economic instability caused by urbanization and changing land values; trespassing, theft, and vandalism; damage to equipment, crops, and livestock; introduction of urban use pollutants entering farm water sources; competition for water; development affecting recharge of groundwater; soil erosion and storm water runoff emanating from urban use; shading of crops from inappropriate buffering; importation of pests and weeds from urban areas or introduced pest populations from unmaintained landscaping; increased traffic; effects of nighttime lighting on growth patterns of greenhouse crops; and interruption of cold air drainage. These impacts would be reduced, but not to below a level of significance, through the implementation of a combination of federal, State, and local regulations (e.g., County Zoning Ordinance, Resource Protection Ordinance, design review guidelines); existing County regulatory processes; the 2011 General Plan goals and policies; and specific mitigation measures/implementation programs identified in the PEIR.

Similar indirect and cumulative impacts related to the conversion of agricultural resources would occur with the proposed Project; refer to Figure 2.2-1A and 2.2-1B for the location of County Identified Agricultural Lands that could be indirectly affected by the proposed Project. For example, conflicts or incompatibility between urban land uses and adjacent or nearby agricultural uses would occur due to issues such as dust, noise, liability concerns, demand for

water, increased traffic, and conflicts with pesticide use. Impacts are expected to be minimal due to the low densities proposed across the Project area, with over 60,000 of the 72,000 acres within the Project area designated with rural densities. As discussed in the General Plan Update PEIR (Page 2.2-15), the rural land use category is implemented to preserve the rural agricultural and backcountry areas of the unincorporated County. Nonetheless, some of the Project areas are proposed for higher densities, including higher density semi-rural designations, and village and commercial designations that could result in land use compatibility conflicts with surrounding agriculture. The proposed changes in land use may result in an increase in density in the vicinity of existing agricultural operations. Such conflicts would have the potential to indirectly cause the conversion of agricultural resources to non-agricultural uses, resulting in a potentially significant impact.

Such impacts would also be cumulative in nature as they would contribute to County-wide conflicts between urban and agricultural land uses, when combined with other development allowed under the 2011 General Plan. The potentially significant indirect and cumulative impacts resulting from implementation of the proposed Project would be reduced by the same regulations and implementation programs (2011 General Plan goals/policies) from the General Plan Update PEIR (and repeated in Section 2.2.4.3 in this SEIR); however, even with these programs in place, impacts would not be reduced to below a level of significance due to the infeasibility of mitigation measures as discussed in Section 2.2.4.3. Therefore, implementation of the proposed Project would result in significant and unavoidable indirect and cumulative impacts related to the conversion of agricultural resources.

#### **2.2.3.4 *Direct and Indirect Loss or Conversion of Forestry Resources***

This section describes potential direct, indirect, and cumulative impacts from the loss or conversion of forestry resources relative to the Project areas addressed in this SEIR.

#### **Guidelines for the Determination of Significance**

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Agricultural Resources, the proposed Project would have a significant impact if it would involve other changes in the existing environment which, due to their location or nature, could directly or indirectly result in the loss of forest land or the conversion of forest land to non-forest use.

Since the certification of the 2011 General Plan Update PEIR, the CEQA Guidelines Appendix G Thresholds regarding agricultural resources was expanded to include impacts to forest lands. Since this component was added to Appendix G after the adoption of the PEIR, potential impacts to forestry resources were not analyzed. In order to adequately analyze potential impacts of the proposed Project, an analysis of forest lands within the Project area has been provided.

## Analysis

As indicated in Section 2.2.3.2, forest land is defined as 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. The Project area includes approximately 14,320 acres of forest vegetation and 14,291 acres of woodland vegetation, for a total of 28,611.2 acres of forest resources. In addition, a majority of the Project area is adjacent to or surrounded by the CNF lands; refer to Figure 1-1, Proposed Project Areas. Development on lands that contain forestry resources or development near CNF lands could impact forestry resources due to direct conversion of forestry resources and the introduction of incompatible land uses that would restrict future forestry or timber production activities.

The General Plan Update PEIR did not directly evaluate forest resources in the context of a timber resource; however, forest resources were indirectly evaluated in terms of the habitat types that are also considered forestry resources. The Biological Resources Chapter 2.4, Section 2.4.3.1 of the PEIR discusses habitat impacts, including impacts to the forestry and woodland habitat categories. The PEIR concluded that impacts to the special status plant and wildlife species and their habitats would be significant and unavoidable due to the impacts from future development.

Using the same methodology used in the Biological Resources chapter to evaluate potential direct impacts to habitats, we are able to analyze direct impacts to forestry resources within the Project area. The referenced methodology is discussed in detail in Chapter 2.4, Section 2.4.3.2 of this draft SEIR. Using this methodology, it is estimated that approximately 3,000 of the 28,611 acres of forest resources within the Project area could be directly impacted by the proposed Project. The 28,611 acres of Forestry Resources are identified as those lands with a “Forest” or “Woodland” Holland Code Vegetation Category. Figures 2.4-1A and 2.4-1B, in the Biological Resources chapter of this SEIR identify the location of these forestry and woodland resources within the Project area. It should also be noted that there has historically been limited commercial timber production in San Diego County, with higher timber harvests coinciding with tree removal associated with wildfire management activities.

Of the 28,611 acres of forestry resources within the Project area, 25,646 acres are designated with a RL-40 or RL-80 designations. This very low density designation would minimize direct and indirect impacts to forest lands by limiting development and incompatible lands uses on or near forest lands. In addition, 1,872 acres within the Project area are designated as Public Agency Lands and/or Open Space Lands, which are typically not subject to future development. Nonetheless, future development within the Project area could impact forest lands, resulting in a significant impact.

Additionally, future development within the Project area may result in land uses that are incompatible with adjacent or nearby CNF lands, such as the construction of a housing tract next

to a heavily forested area. Such development could eventually lead to permanent impacts on the CNF lands due to factors such as erosion/siltation, invasive plants, edge effects (e.g., human intrusion, predation by pets), noise (e.g., nest abandonment), night-lighting (e.g., nocturnal wildlife predation), and habitat fragmentation, or the indirect conversion of such lands to non-forest use. Therefore, the proposed Project would have the potential to result in significant indirect impacts on CNF forest lands and forestry resources.

On a cumulative level, future development of these parcels would have the potential to contribute to cumulatively considerable impacts resulting from the loss of forestry resources or the conversion of CNF forest lands to non-forest uses.

## **2.2.4 Mitigation**

### **2.2.4.1 *Direct Conversion of Agricultural Resources***

Similar to the General Plan Update PEIR, direct and cumulative impacts resulting from the conversion of agricultural resources associated with the proposed Project would be reduced through implementation of a number of mitigation measures and 2011 General Plan goals and policies, and repeated below. However, consistent with the PEIR, impacts would not be reduced to below a level of significance. The County PEIR determined that implementation of the additional measures listed below would be infeasible Countywide, for the following reasons, and would not be implemented:

- Restrict any development of land uses with allowable densities of one du/acre or more, due to potential incompatibilities with agricultural resources. This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth under the proposed Project. Restricting land use densities of one du/acre or more would result in a greater concentration of lower density land uses distributed throughout the unincorporated County and would discourage sustainable growth because infrastructure costs, vehicle miles traveled and environmental impacts associated with development would be increased. This mitigation measure would conflict with the proposed Project objective of promoting sustainability by locating new development near existing infrastructure, services and jobs.
- Create a land use designation solely for agricultural resources, within which no other land uses would be allowable. This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth under the proposed Project and/or in areas where existing land uses are not the same as those considered by the proposed Project. Additionally, many agricultural operations throughout the unincorporated County are unique in that they operate on small lots, located adjacent to a variety of land uses, such as residential. Creating an agriculture-resource-only land use designation would negatively impact many existing County agricultural operations located in non-agricultural land uses. Therefore, this measure

would conflict with the proposed Project objective to preserve agriculture as an integral component of the region's economy, character, and open space network.

Because the measures listed above were found to be infeasible, impacts would be significant and unavoidable.

**Adopted 2011 General Plan Policies**

Implementation of the 2011 General Plan policies listed below would reduce impacts resulting from the direct conversion of agricultural resources, although not to below a level of significance for the reasons stated above:

**Policy LU-6.4: Sustainable Subdivision Design.** Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]

**Policy LU-7.1: Agricultural Land Development.** Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

**Policy LU-7.2: Parcel Size Reduction as Incentive for Agriculture.** Allow for reductions in lot size for compatible development when tracts of existing historically agricultural land are preserved in conservation easements for continued agricultural use.

**Policy COS-6.4: Conservation Easements.** Support the acquisition or voluntary dedication of agriculture conservation easements and programs that preserve agricultural lands.

These policies will guide development to preserve existing agricultural resources, encourage acquisition and voluntary dedication of conservation easements and programs, and promote the agricultural industry within the County to ensure the long term-viability of agricultural resources. Adherence to these policies will further reduce impacts associated with the direct conversion of agricultural resources from future development.

**Mitigation Measures**

Implementation of the mitigation measures listed below would reduce impacts associated with the direct conversion of agricultural resources, although not to below a level of significance for the reasons stated above.

**Agr-1.1** Implement the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural operations.

**Agr-1.2** Develop and implement programs and regulations that protect agricultural lands (such as the CEQA guidelines, Zoning Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County

Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program), as well as, those that support implementation of the Williamson Act (including the CEQA guidelines, Zoning Ordinance, and Subdivision Ordinance).

- Agr-1.3** Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted.
- Agr-1.4** Develop and implement the Purchase of Agricultural Conservation Easement (PACE) program which compensates landowners for voluntarily limiting future development on their land.
- Agr-1.5** Revise community plans to identify important agricultural areas within them and specific compatible uses and desired buffers necessary to maintain the viability of that area. Community plans are used to review development projects (including General Plan Amendments).

Agr-1.1 would lower the allowed density in rural areas, thus, the potential conversion of agriculture to development will be considerably reduced. Agr-1.2 requires the County to develop and implement programs and regulations that place limits on allowable impacts to agriculture, thereby substantially reducing the amount of conversion to non-agricultural uses. Agr-1.3 requires the County to create a Conservation Subdivision Program that facilitates conservation-oriented project design, while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted. Agr-1.4 will incentivize the placement of agricultural conservation easements on farmland, thereby increasing preservation and reducing conversion of agricultural resources in San Diego County. Agr-1.5 will limit future conversion of farmland identified as important for each community.

#### **2.2.4.2 Conflicts with Agricultural or Forest Lands**

Impacts with regard to conversion of agriculture as a result of the proposed Project would be reduced to below a level of significance with implementation of applicable 2011 General Plan policies and mitigation measures identified in the General Plan Update PEIR, and repeated below. Regarding forest lands, the proposed Project would not conflict with existing zoning for Timberland or designated Forest Land because the County does not specifically identify any jurisdictional land as forest land. Impacts related to the rezoning of forest land as defined in Public Resources Code, Section 12220(g) would be less than significant.

### Adopted 2011 General Plan Policies

In addition to Policy LU-7.1 identified above, the following 2011 General Plan policy will further minimize impacts due to conflicts with agricultural or forest lands.

**Policy COS-6.3: Compatibility with Recreation and Open Space.** Encourage siting compatible recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.

This policy requires lower density development designations, and siting of compatible recreational and open space uses in agricultural areas. Adherence to this policy will reduce potential land use conflicts with Williamson Act Contract lands because it will ensure that lands adjacent to Contract lands will either have low intensity development, or open space uses.

### Mitigation Measures

**Agr-2.1** Prior to the approval of any Zoning Ordinance Amendment that would result in the removal of an “A” designator from a certain property, an analysis shall be conducted to ensure that the action removing such a designation will not result in any significant direct or indirect adverse impact to Williamson Act Contract lands.

Agr-2.1 will ensure that potential land use conflicts with Williamson Act Contract lands are avoided.

#### **2.2.4.3 *Indirect Conversion of Agricultural Resources***

Consistent with the General Plan Update PEIR, the proposed Project’s indirect and cumulative impacts with regard to conversion of agricultural resources would not be reduced to below a level of significance with implementation of the 2011 General Plan policies and mitigation measures identified below. The P EIR determined that implementation of the additional measures listed below would be infeasible and would not be implemented:

- Within 0.5 mile of any agricultural resource, approve development that is compatible in size and scope with the existing agricultural resource. This measure would be infeasible because it would restrict future development in areas identified for increased growth by the proposed Project. Small farming operations are typical in the County, and many existing and potential agricultural operations are located on small parcels with intermixed surrounding land uses. This measure would restrict certain types of incompatible development in these areas, which would have the potential to conflict with the land uses considered by the proposed Project. This measure would also conflict with the proposed Project objective of promoting sustainability by locating new development near existing infrastructure, services and jobs because many existing agricultural resources within the unincorporated County are located in areas where existing infrastructure, services and jobs already exist.

Because the measure listed above was found infeasible and would not be implemented, impacts would be significant and unavoidable.

### Adopted 2011 General Plan Policies

Implementation of the 2011 General Plan policies LU-6.4, LU-7.1, LU-7.2, and COS-6.4 identified above, the following policy would further reduce impacts resulting from the indirect conversion of agricultural resources, although not to below a level of significance for the reasons stated above:

**Policy COS-6.2: Protection of Agricultural Operations.** Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:

- Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations
- Encouraging 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
- Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development.
- Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture
- Supporting local and State right-to-farm regulations
- Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process

**Policy COS-6.3: Compatibility with Recreation and Open Space.** Encourage siting recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.

These policies minimize indirect conversion of farmland by requiring conservation of agricultural lands and operations, and by limiting conflicts from incompatible uses adjacent to farmland. Adherence to these policies will further minimize impacts associated with indirect conversion of agricultural resources from future development.

### Mitigation Measures

Implementation of the mitigation measures listed in Section 2.2.4.1 would reduce indirect and cumulative proposed Project impacts associated with the conversion of agricultural resources, although not to below a level of significance for the reasons stated above.

Agr-1.1 would protect agricultural lands with lower density land use designations that will support continued agricultural operations. By lowering density in rural areas, the potential for indirect conversion of agriculture, through compatibility conflicts between existing agriculture and new development, will be considerably reduced. Agr-1.2 requires the County to develop and implement programs and regulations that place limits on allowable impacts to agriculture, thereby substantially reducing the amount of indirect conversion to non-agricultural uses. Agr-1.3 will reduce potential compatibility conflicts and indirect conversion of farmland. Agr-1.4 will incentivize the placement of agricultural conservation easements on farmland, thereby increasing preservation and reducing indirect conversion of agricultural resources in San Diego County. Agr-1.5 will minimize potential compatibility conflicts between agriculture and other uses, thereby reducing indirect conversion of farmland.

#### **2.2.4.4 *Direct and Indirect Loss or Conversion of Forestry Resources***

Due to the fact that forestry resources were not directly analyzed in the General Plan Update PEIR, no specific mitigation measures or policies were provided to reduce impacts to forest lands. However various existing 2011 General Plan polices and mitigation measures, identified below, would reduce impacts to forestry resources, although not to below a level of significance. In an effort to further reduce or minimize impacts related to the direct loss or conversion of forestry resources, the following measure has been incorporated into this SEIR; however, it has been determined to be infeasible for the following reason:

- Require that all development proposed within the Project area evaluate and mitigate the direct loss or conversion of forestry resources. This measure would not be feasible because most future development in the Project areas will be permitted with ministerial permits that will not be subject to environmental review.

Because the measure listed above has been found to be infeasible and would not be implemented, and because implementation of the adopted 2011 General Plan and mitigation measures described in this section would reduce impacts, but not to a level less than significant, impacts with respect to direct loss or conversion of forestry resources would remain significant and unavoidable. This measure would be infeasible because a majority of development proposed within the Project areas will not be subject to environmental review in which the direct loss or conversion of forestry resources can be quantified. Development will be permitted with ministerial permits and thus is not subject to environmental review. Therefore, even with implementation of the applicable 2011 General Plan policies and mitigation measures listed below, any direct conversion of forestry resources due to private development of parcels within the Project areas addressed in this SEIR would remain significant and unavoidable.

#### **Adopted 2011 General Plan Policies**

Implementation of adopted 2011 General Plan Polices LU-6.1, COS-1.10, and COS-2.2 would reduce impacts to loss or conversion of forestry resources, however, impacts would not be reduced below a level of significance.

**Policy LU-6.1: Environmental Sustainability.** Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.

**Policy COS-1.10: Public Involvement.** Ensure an open, transparent, and inclusive decision-making process by involving the public throughout the course of planning and implementation of habitat conservation plans and resource management plans.

**Policy COS-2.2: Habitat Protection through Site Design.** Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.

These policies require monitoring, management and maintenance of a regional preserve system, facilitate preserve assembly and funding, help minimize edge effects, facilitate preparation of habitat conservation plans and resource management plans, direct development to avoid and/or preserve habitat, provide for long-term sustainability of the natural environment, and encourage contiguous open space areas that protect wildlife habitat and corridors. Adherence to these policies will further reduce impacts to special status species from future development.

### Mitigation Measures

Implementation of General Plan Update PEIR Mitigation Measures Bio-1.1, Bio-1.3, and Bio-1.6 would help reduce impacts related to loss or conversion of forestry resources, however, impacts would not be mitigated below a level of significance.

**Bio-1.1** Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. It is intended that these changes will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval.

**Bio-1.3** Implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan.

**Bio-1.6** Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.

Bio-1.1 will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Bio-1.3 requires the County to implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP

**SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT**

Subarea Plan. Bio-1.6 requires the implementation of ordinances that are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources.

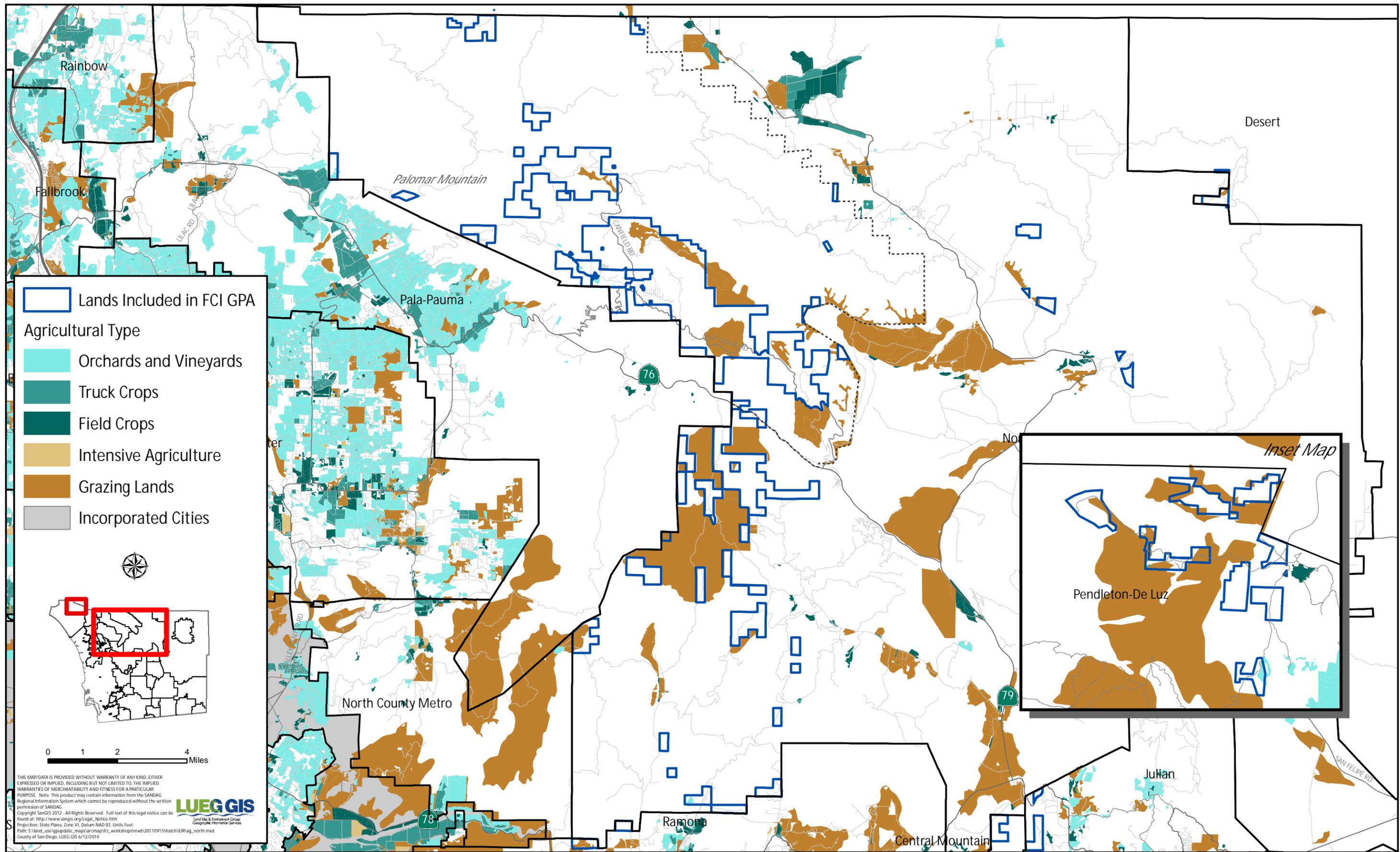
**TABLE 2.2-1 COUNTY IDENTIFIED AGRICULTURAL LANDS AND IMPACT ESTIMATES**

<b>Land Use Designation</b>	<b>Impact Assumption</b>	<b>Agricultural Lands Within Project Area (acres)</b>	<b>Agricultural Impacts (acres)</b>
Village Residential	100%	—	—
Village Core Mixed Use	100%	—	—
Rural Commercial	100%	—	—
Semi-Rural Residential	1.5 acres per unit	164.5	13.6
Rural Lands	1.5 acres per unit	5,615.9	34.9
Specific Planning Area	0%	—	—
Open Space	0%	5.3	—
Public/Semi-Public Facilities	100%	—	—
Tribal Lands	0%	—	—
Public Agency Lands	0%	123.2	—
<b>Total</b>	—	5,909.0	48.5

**TABLE 2.2-2. FARMLAND MAPPING AND MONITORING PROGRAM LANDS**

<b>FMMP Category</b>	<b>FMMP acres within FCI Project Area</b>				
	<b>Public Agency Lands</b>	<b>Public/Semi-Public Facilities</b>	<b>Rural Lands</b>	<b>Semi-Rural Lands</b>	<b>Total</b>
Prime Farmland	0.0	0.0	41.9	0.0	41.9
Farmland of Statewide Importance	0.0	0.0	31.2	0.0	31.2
Farmland of Local Importance	122.8	0.0	4,434.6	158.0	4,715.3
Unique Farmland	0.0	0.0	63.6	0.0	63.6
Grazing Land	0.5	0.0	1,044.6	6.6	1,051.6
Total Acreage of FMMP lands within FCI project area:					5,903.7

Source: California Department of Conservation 2013; LUEG 2012.

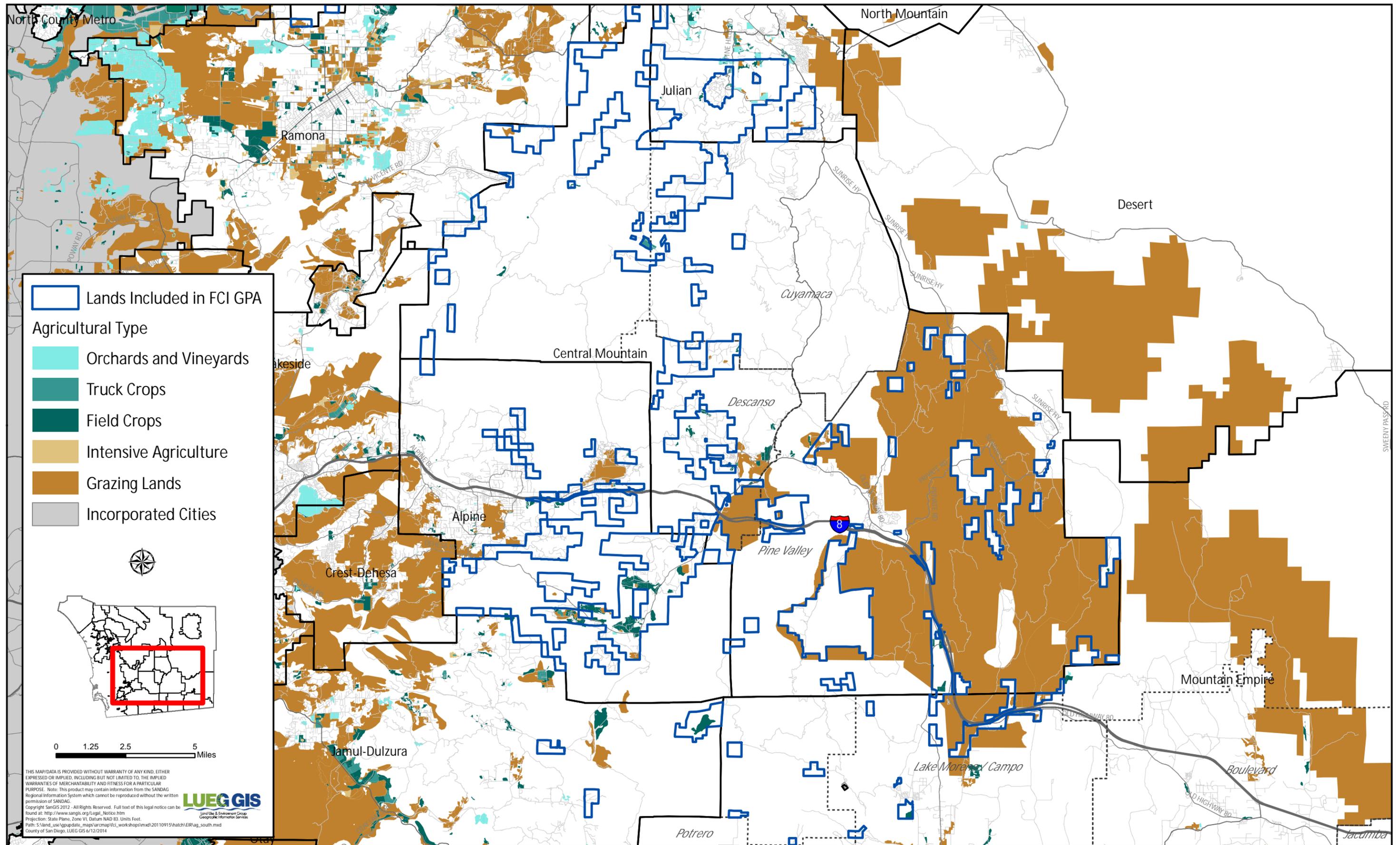


Source: SanGIS, County of San Diego, 2008

County Identified Agricultural Lands – North

Figure 2.2-1A

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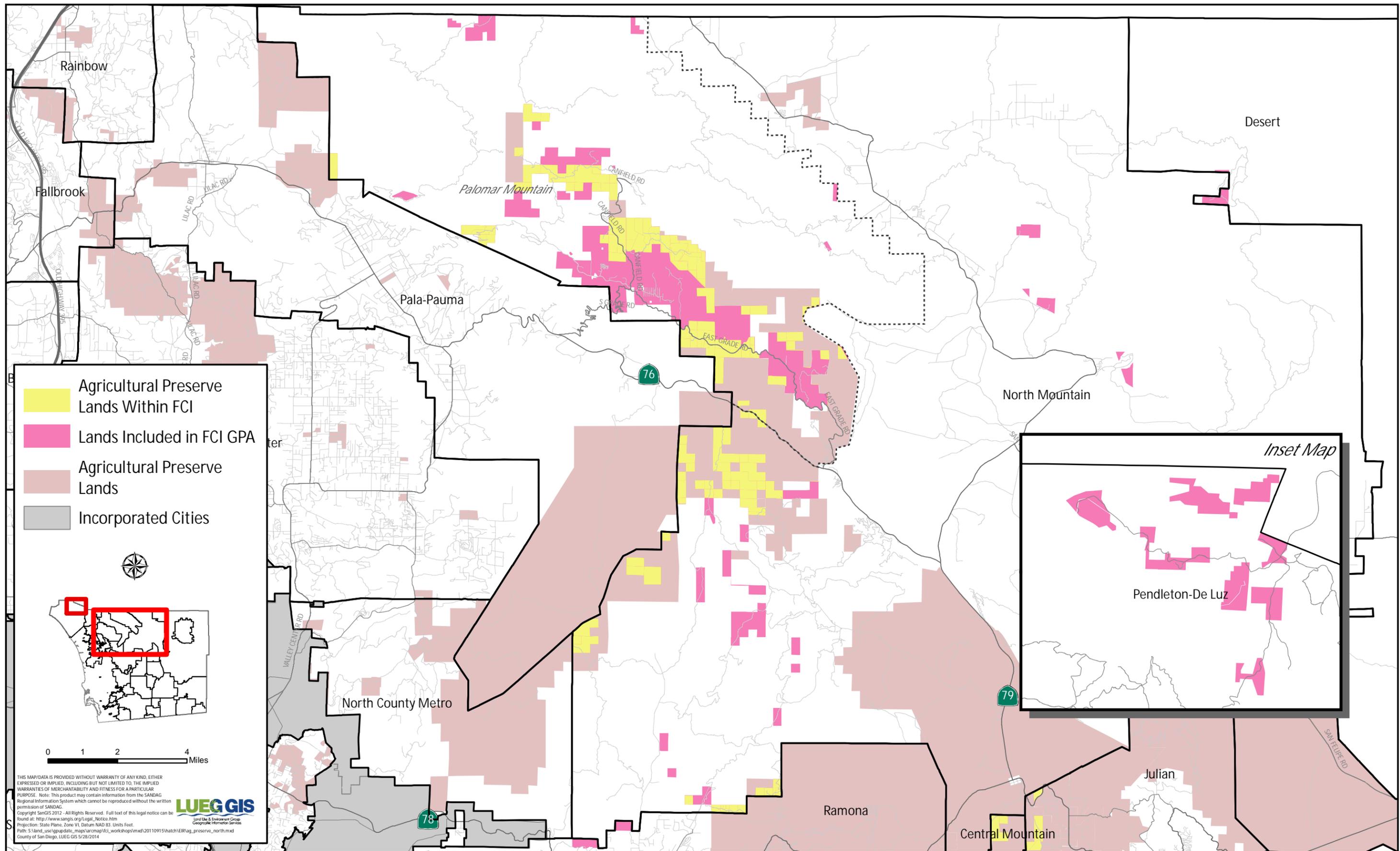


Source: SanGIS, County of San Diego, 2008

County Identified Agricultural Lands

Figure 2.2-1B

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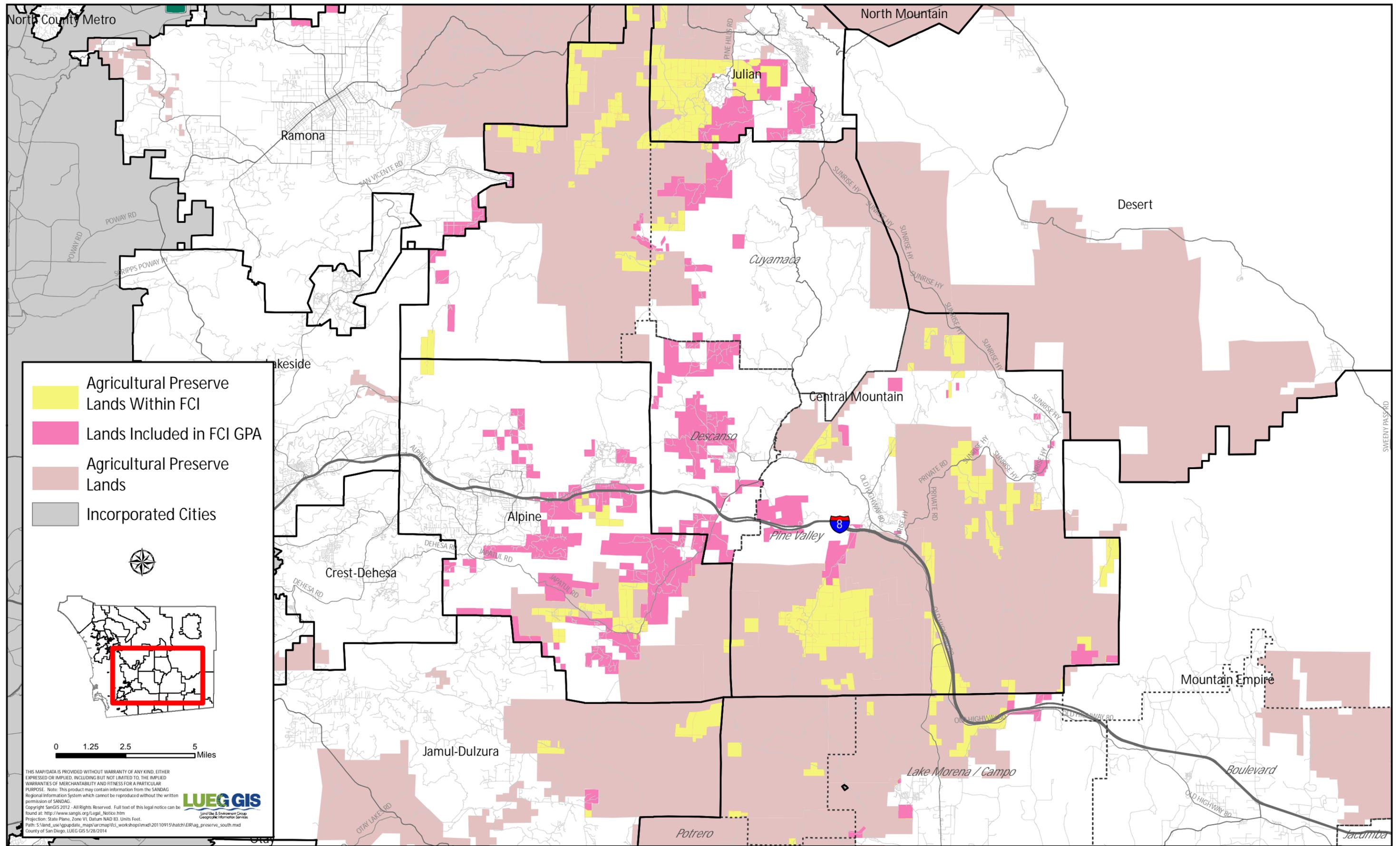


Source: SanGIS, County of San Diego, 2014

Agricultural Preserves – North

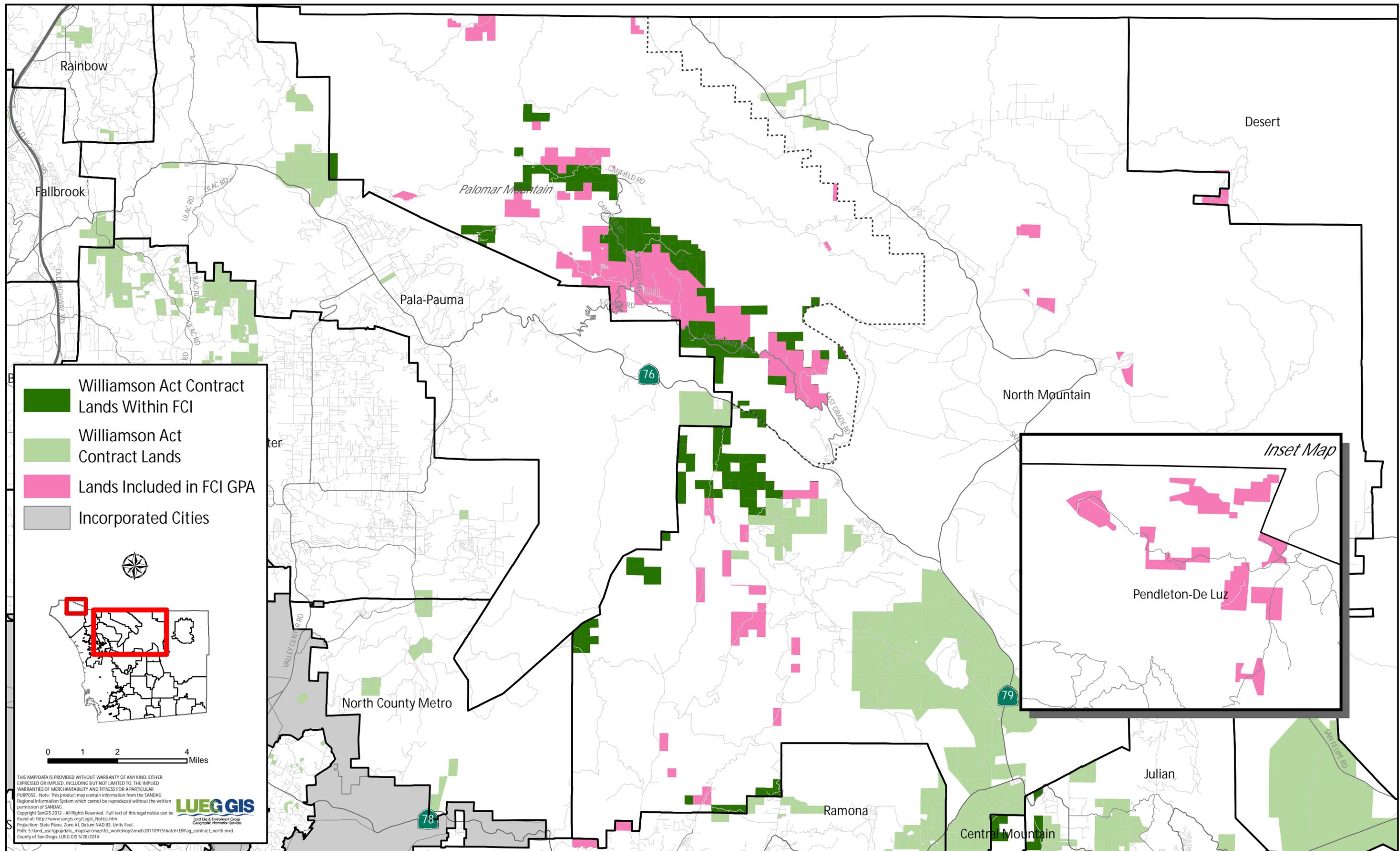
Figure 2.2-2A

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Source: SanGIS, County of San Diego, 2014

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Source: SanGIS, County of San Diego, 2014

Williamson Act Contract Lands – North

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