

2.2 Agriculture and Forestry Resources

This section evaluates existing conditions for San Diego County agricultural resources (including but not limited to Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance (“Farmland”); zoning for agricultural use, Williamson Act contracts, and other agricultural uses in the County and the potential effects that implementation of the project may have on these resources. This section also evaluates existing conditions for zoning of forest land, timberland, and Timberland Production Zones; forest land; and potential effects that implementation of the project may have on these forestry resources. Potential impacts for the project are analyzed, and mitigation measures are provided for those impacts determined to be significant.

There were no comments received during the Notice of Preparation (NOP) scoping process that included specific concerns regarding agriculture and forestry resources. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this Draft Supplement to the 2011 General Plan Update (GPU) Program Environmental Impact Report (2011 GPU PEIR) (Draft SEIR).

2.2.1 Existing Conditions

2.2.1.1 Agriculture Resources

The 2011 General Plan Update (GPU) Program Environmental Impact Report (PEIR) included a discussion of existing conditions related to agriculture in Section 2.2.1 of the Agricultural Resources chapter, which includes all lands within the unincorporated County. As described on pages 2.2-1 through 2.2-8, the County has identified approximately 407,600 acres of agricultural resources within its boundaries, which are categorized into one of two commodity categories: grazing lands or croplands. Existing conditions related to agricultural resources have not changed substantially since certification of the 2011 GPU PEIR.

2.2.1.2 Forestry Resources

The NOP for the 2011 GPU PEIR was released for publication on April 28, 2008. In 2009, Appendix G of the California Environmental Quality Act (CEQA) Guidelines was amended to include additional significance criteria to evaluate a project’s potential impact on forestry resources. As the amended significance criteria addressing forestry resources were not yet adopted at the time the NOP for the 2011 GPU PEIR was released, an evaluation of potential impacts on forestry resources was not included in the 2011 GPU PEIR. As such, this section includes an analysis of project impacts to forestry and timberland 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% stocked with forest trees, and forest areas adjacent to urban and built-up lands” (San Diego 2016:2.2-1).

Most 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 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. “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. However, lands that are managed by the U.S. Forest Service (U.S.F.S.) and included within the Cleveland National Forest (CNF) are located within the unincorporated County, including portions of Alpine, Central Mountain, Jamul–Dulzura, Julian, Mountain Empire, North Mountain, and Pendleton–De Luz. While the CNF lands are under the jurisdiction of the U.S.F.S., the private lands adjacent to and surrounding the CNF lands are under the County’s jurisdiction.

2.2.2 Regulatory Framework

Chapter 2.2 of the 2011 GPU PEIR, pages 2.2-9 through 2.2-12, describes the Regulatory Framework related to agricultural resources and is hereby incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR and applicable to the project include the following:

Federal

- Farmland Protection Policy Act

State

- Right to Farm Act
- California Land Conservation Act of 1965 (Williamson Act)
- California Farmland Conservancy Program
- Cortese-Knox-Hertzberg Local Government Reorganization Act
- Open Space Subvention Act
- Farmland Mapping and Monitoring Program
- Farm and Ranch Lands Protection Program
- California Land Evaluation Site Assessment Model

Local

- County of San Diego Agricultural Enterprises and Consumer Information Ordinance
- County of San Diego BOS Policy I-38, Agricultural Preserves
- County of San Diego BOS Policy I-133, Support and Encouragement of Farming in San Diego County
- County of San Diego Farming Program
- Agricultural Clearing Permit Requirements
- Local Agricultural Resource Assessment (LARA) Model

The regulatory framework discussed in the 2011 GPU PEIR regarding agricultural resources largely has not changed since adoption of the General Plan in August 2011 (with exception of adoption of the Agricultural Promotion Program Ordinance on March 15, 2017 and described below), and continues to apply to the unincorporated County as addressed in the Draft SEIR.

County of San Diego Agricultural Promotion Ordinance

On March 15, 2017, the County Board of Supervisors (Board) amended the Zoning Ordinance to allow flexibility of permitting for agricultural uses while minimizing development impacts and protecting environmental resources. This amendment added and clarifies agricultural use definitions; supplemented agricultural opportunities to include new agri-tourism accessory uses; 3) allowed wineries in the S92 Use Regulations; and 4) revised the animal use regulations. Uses that are regulated by these Zoning Ordinance amendments include: creameries, microbreweries, micro-distilleries; and agricultural stores.

The County's Wind Energy Ordinance EIR (2012 Wind Energy EIR) included a discussion of the regulatory framework related to forest resources in Section 2.2.2 of the Agriculture and Forest Resources chapter, which includes lands within the unincorporated County

(San Diego County, 2012). That discussion is hereby incorporated by reference. Specific regulations and plans discussed in the 2012 Wind Energy EIR and applicable to the project include the following:

Federal

- Cleveland National Forest Land Management Plan

State

- California Public Resources Code section 4526 (definition of timberland)
- California Public Resources Code section 12220(g) (definition of forest land)
- California Government Code section 51104(g) (definition of timberland production zone)

Adopted 2011 GPU Policies

The policies applicable to agricultural resources that were adopted as part of the 2011 GPU and are applicable to the project include the following:

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-6.2: 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-6.4: Conservation Easements. Support the acquisition or voluntary dedication of agriculture conservation easements and programs that preserve agricultural lands.

Adopted 2011 GPU PEIR Mitigation Measures

The mitigation measures applicable to agricultural resources that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

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.

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 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-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 a Williamson Act Contract lands.

2.2.3 Issues Not Discussed Further

As described in Chapter 1.0, Project Description, in response to litigation and considering legislative changes that have occurred since preparation of the 2012 Climate Action Plan

(CAP), the County prepared a new CAP (subject of this Draft SEIR). The CAP and the targets and strategies identified therein necessitate changes to Goal COS-20 and Policy COS-20.1 of the County's General Plan (2011 GPU) and mitigation adopted in the 2011 GPU PEIR, Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 to attain consistency with current legislative requirements. These changes require a General Plan Amendment (GPA) as part of the administrative approval process. The Draft SEIR evaluates the GPA as part of the actions associated with the CAP because the changes reflected in the GPA support and are consistent with implementation of the CAP, its GHG targets, and GHG reduction measures. Therefore, the GPA is not addressed as a separate impact discussion below, but its impacts are included within the overall impact analysis of the CAP.

The Draft SEIR also evaluates the impacts associated with the implementation of proposed GHG Significance Threshold, Guidelines for Determining Significance for Climate Change (Guidelines), and the Report Format and Content Requirements. The proposed GHG Threshold is "consistency with the CAP," and is the level below which a project would be determined to result in less-than-significant GHG impacts. To achieve consistency, a project may choose to implement GHG reduction measures outlined in the CAP. All measures have been evaluated throughout the Draft SEIR. Therefore, adoption of a GHG Threshold that establishes a requirement to be consistent with the CAP, the individual measures of which have been evaluated throughout this Draft SEIR, would not require a separate impact analysis because the impacts of establishing that threshold and what it would take to meet the threshold have been fully evaluated.

The Guidelines would provide direction to project applicants on how a project could achieve consistency with the CAP. The Guidelines are proposed to include a checklist that would require applicants to demonstrate how a project would be consistent with the CAP including through implementation of GHG reduction measures. The specific actions that would result from the Guidelines would be project-specific implementation of approved GHG reduction measures, the environmental impacts of which have been evaluated throughout this Draft SEIR. Therefore, evaluation of the Guidelines as a separate impact discussion is not provided below.

Finally, the Report Format and Content Requirements document would not result in any physical impacts on the environment as it simply details the format for how reports should be written. As a result, this document is also not separately discussed below.

In summary, the GPA, GHG Threshold, Guidelines, and Report Format and Content Requirements are not addressed as a separate impact discussion below. The GPA, Guidelines, and GHG Threshold are combined in the overall impact analysis of the CAP, while the Report Format and Content Requirement document provides technical direction to future project applicants and would not result in any physical impacts.

2.2.4 Analysis of Project and Cumulative Impacts

The project and cumulative impact analysis study area for agriculture resources in the 2011 GPU PEIR was identified as the San Diego region, which includes the entire County

of San Diego, including incorporated areas, Riverside County, Orange County, and Imperial County. The scope for the cumulative analysis has been defined by the climatic conditions of southern California that create a subtropical climate that optimizes the production of a variety of crops that would be more difficult to produce elsewhere (page 2.2-27). The CAP would apply to development and activities in the County, and utilizes the same project and cumulative study area for agricultural resources as the 2011 GPU PEIR, which is hereby incorporated by reference.

Because the 2011 GPU PEIR did not analyze forestry resources, the scope of the project and cumulative impact analysis study area from the 2012 Wind Energy EIR is used. The scope for this analysis is consistent with the scope of analysis for agricultural resources in the 2012 Wind Energy EIR (page 2.2-1), which is the County of San Diego.

Proposed GHG Reduction Measures

Table 1-1 of this Draft SEIR provides a list of all the proposed GHG reduction measures and supporting efforts that would be implemented by the CAP. However, in the case of agricultural and forestry resources, only GHG Reduction Measure 2.1 is anticipated to result in any significant impacts related to this topic. All other GHG reduction measures would be improvements at existing facilities, would occur within developed areas, or would occur in areas designated for such uses. Further, implementation of the CAP would result in several co-benefits related to agricultural resources including expansion of the Purchase of Agriculture Conservation Easement Program (PACE) under GHG Reduction Measure T-1.2 which would result in the County approving additional agricultural easements to protect resources; establishment of a Direct Investment Program under GHG Reduction Measure T-4.1 which could result in efforts to expand reforestation and forest preservation; and several measures that focus on creating energy efficiency and reducing GHG emissions through infrastructure upgrades and manure management. No significant environmental effects of these measures would occur.

As a result, GHG Reduction Measure E-2.1 is evaluated in this chapter. However, this measure does not indicate where specific improvements would be constructed within the County, their size, or specific characteristics. As a program EIR, the Draft SEIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures and supporting efforts were considered during preparation of the Draft SEIR, to the degree information about the measures is known. Consistent with the requirements of CEQA Guidelines Section 15168, this Draft SEIR provides a programmatic discussion of the potential general impacts of implementation of this measure, and not project-level or site-specific physical impacts of individual renewable energy projects. This is consistent with the scope of analysis in the 2011 GPU PEIR.

Strategy E-2: Increase Renewable Energy Use

Measure E-2.1: Increase Renewable Electricity. Achieve 90% renewable electricity for the unincorporated county by 2030. Implementation of this measure could result in construction of small-scale distributive energy renewable

systems, and large-scale photovoltaic solar array fields, photovoltaic concentrator technology, or wind turbines. This may result in physical changes resulting from construction, operation, and maintenance of infrastructure. Agricultural and forestry resources impacts could result from indirect or direct conversion of agricultural and forest land due to the installation of renewable energy facilities and from conflicts with agricultural zoning.

2.2.4.1 Issue 1: Direct or Indirect Conversion of Agricultural Resources

This section describes potential project and cumulative impacts on direct or indirect conversion of agricultural resources with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Agricultural Resources, which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, the project would have a significant impact if it would result in a direct or indirect conversion of 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 project would substantially impair the ongoing viability of important agricultural resources

An indirect impact would occur if compatibility conflicts with existing agricultural activities resulted in termination of agricultural activities. Land use/agricultural interface issues often arise from dust, noise, liability concerns, trespassing, theft, competition for water, traffic, pest introduction and conflicts with pesticide use. The type of agricultural use and the sensitivity of the nearby land uses would be key considerations in determining agricultural compatibility. If these conflicts would result in the conversion of agricultural resources to nonagricultural uses, then a potentially significant impact would occur.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated direct conversion of agricultural resources related to the adoption of the goals and policies contained within the plan and buildout of the land use map, and determined that the buildout under the 2011 GPU would result in potentially significant direct and cumulative impacts to agricultural resources.

The 2011 GPU PEIR evaluated the potential for other changes to cause indirect conversion of agricultural land related to the adoption of the goals and policies contained within the plan and buildout of the land use map, and determined that the buildout under the 2011 GPU would result in potentially significant indirect and cumulative impacts to agricultural resources.

The 2011 GPU PEIR determined that agricultural conversion could be reduced through implementation of a combination of the adopted 2011 GPU goals and policies and the mitigation measures identified in the 2011 GPU PEIR. However, the GPU goals and policies and the PEIR mitigation measures would not reduce impacts to less than significant because the 2011 GPU would allow growth and development on land that supports agricultural uses. Direct agricultural impacts of the 2011 GPU PEIR were, therefore, determined to be significant and unavoidable. The discussion of impacts related to agricultural conversion can be found in Chapter 2.2, Agricultural Resources, pages 2.2-12 through 2.2-20, 2.2-27, and 2.2-29, and is hereby incorporated by reference.

Regarding indirect agricultural resources conversion, the 2011 GPU PEIR concluded that impacts would be reduced through implementation of a combination of the adopted 2011 GPU goals and policies and the mitigation measures identified in the 2011 GPU PEIR, but not to a level below significance because the 2011 GPU would designate land uses that would allow additional growth and development that could indirectly result in the conversion of agricultural land uses. Indirect agricultural impacts of the 2011 GPU PEIR were, therefore, determined to be significant and unavoidable. The discussion of impacts related to agricultural conversion can be found in Chapter 2.2, Agricultural Resources, pages 2.2-23 through 2.2-27; 2.2-28; and 2.2-31 through 2.2-33, and is hereby incorporated by reference. Specific policies and mitigation measures related to agricultural land conversion are listed above under Section 2.2.2, Regulatory Framework.

CAP Impact Analysis

Implementation of the CAP has the potential to result in significant direct and indirect agricultural land conversion from implementation of GHG Reduction Measure E-2.1 that would result in the construction, operation, and maintenance of large-scale photovoltaic solar, concentrated solar, wind turbines, and geothermal energy systems that were not explicitly evaluated within the 2011 GPU PEIR. The 2012 Wind Energy EIR evaluated impacts specifically related to the development of large-scale wind turbines and is summarized below and hereby incorporated by reference (San Diego County, 2012).

Implementation of GHG Reduction Measure E-2.1 would result in the physical construction of new, large-scale renewable energy systems including associated infrastructure such as roads and accessory uses. Typical construction activities would require the use of trucks, staging areas for supplies and equipment, parking for workers, and signage and grading. All activities would be temporary effects of the construction process and would not likely result in permanent direct or indirect conversion of agricultural resources.

The following section describes the potentially significant agricultural land conversion impacts that could result from implementation of the measure.

Large-Scale Renewable Energy Infrastructure

Implementation of GHG Reduction Measure E-2.1 could result in the construction, operation, and maintenance of new large-scale renewable energy systems, including large-scale photovoltaic solar, concentrated solar power, geothermal systems, and/or wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this Draft SEIR evaluates the potential for impacts at the program level. Specific locations for projects have not been identified. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application.

Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are suited for generating the renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses due to the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees; this could include areas with agricultural resources. A brief description of the type of infrastructure and facilities that accompany large-scale renewable energy systems is included in Section 2.1.4 of this Draft SEIR.

Photovoltaic Solar or Concentrator Solar Systems

Large-scale renewable solar systems can range in size from 2 to several thousand acres. The location of large-scale photovoltaic solar systems is limited by the County's Zoning Ordinance Section 6954(b)(2), which requires a Major Use Permit (MUP) for solar system projects over 10 acres. Solar projects less than 10 acres in size would be required to apply for and receive an Administrative Permit in accordance with Section 6954(b)(1). Concentrated solar systems require a MUP in accordance with Section 6954(b)(3).

Photovoltaic and concentrated solar systems could directly convert agricultural resources because of the installation of the solar facility and support facilities listed above. Conversion of several thousand acres of agricultural land to non-agricultural use due to solar facilities and associated infrastructure would result in a significant impact.

Additionally, indirect conversion of agricultural resources may occur in several ways that cannot be known until the location and characteristics of solar projects are known. However, to provide a general discussion of example impacts, construction activities may generate dust that could adversely affect adjacent agriculture. Such impacts would be temporary, but could be significant depending on the duration and extent of the impact.

Large-Scale Wind Turbine Systems

The size of large-scale wind turbine farms can range from 30 acres to several hundred acres. The location of large-scale wind turbine farms would be limited by the County's Wind Energy Ordinance Section 6952 which sets forth requirements related to setbacks. All large turbine projects would be required to obtain a MUP and undergo the County's discretionary review process.

Wind energy systems could directly convert agricultural resources because of installation of the facility and support facilities listed in Section 2.1.4 of this Draft SEIR. Wind energy systems could also result in indirect conversion of agricultural resources if significant ground disturbing activities were to accompany the project.

Geothermal Energy Systems

Geothermal energy systems could result in direct agricultural resources conversion from installation of the geothermal power plant and support facilities discussed in Section 2.1.4 of this Draft SEIR. Permanent impacts from wells, a geothermal power plant, transmission lines, access roads, and other facilities could also result in significant agricultural conversion impacts depending on the size of development. The County would require a MUP pursuant to Zoning Ordinance for all geothermal energy system projects and as part of the discretionary review process, these projects would also be required to undergo CEQA review.

Indirect conversion of agricultural resources may happen in a number of ways that cannot be known until the location and characteristics of geothermal projects are known. However, to provide a general discussion of example impacts, construction activities may generate dust that could adversely affect adjacent agriculture. Such impacts would be temporary, but could be significant depending on the duration and extent of the impact. Geothermal facilities may also emit steam from cooling systems during operation, which may affect adjacent agricultural uses. This impact could be significant depending on the extent of the impact.

All large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to the direct or indirect conversion of agricultural resources to the extent feasible in compliance with CEQA Guidelines Section 15126.4. However, it may be infeasible to fully mitigate the direct and indirect impacts to agricultural land conversion to below a level of significance because of the size and magnitude of the development associated with these systems. As described on page 2.2-10 and 2.2-16 of the 2012 Wind Energy EIR, large-scale production of energy from wind turbines could result in impacts related to direct and indirect conversion of agricultural resources. The 2012 Wind Energy EIR adopted Mitigation Measure AG-1 described below in Section 2.2.5 (below) which requires that all new large-scale wind turbines projects are reviewed for compliance with the County's Guidelines for Determining Significance for Agricultural Resources, and if significant impacts are identified, implement feasible project-specific mitigation measures. However, the EIR concluded that because there is no guarantee on a project-specific level that mitigation measures would reduce impacts to a level below significant, the project may result in significant impacts related to conversion of farmland. The 2012 Wind Energy EIR considered additional mitigation that would have prohibited large-scale wind turbines on Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance; however, this mitigation was determined to be infeasible because such farmland may be located within high-quality wind resource area which would conflict with the County's goal of expanding renewable energy resources.

Therefore, while all large-scale renewable energy projects would be required to obtain a MUP, undergo a discretionary review, evaluate project-specific impacts under CEQA, and mitigate the extent feasible, it is not possible to ensure that impacts related to direct or indirect conversion of agricultural resources would be reduced to a level below significance. Projects would be required to implement the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above that would require new development to conserve and protect agricultural land. However, implementation of all large-scale renewable energy systems and infrastructure would have a **potentially significant** impact to direct and indirect conversion of agricultural resources (**Impact AG-1**).

Cumulative Impacts

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to a regional loss of agricultural resources because of direct or indirect conversion. CEQA Guidelines Section 15130 describes two methods for establishing the cumulative environment in which the project is to be considered: the use of a list of past, present, and probable future projects, or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This analysis uses a combination of the list and planning document approach, as described in Chapter 1, Project Description. Physical improvements resulting from implementation of the CAP have the potential to combine with the physical impacts of other past, present, or probable future projects in the unincorporated County and could result in a cumulative impact based upon proximity and construction schedule. **Table 1-3** in the Project Description contains a list of past, present, and probable future projects that when combined with the project, could result in a cumulatively considerable effect. Cumulative impacts could also result when the physical improvements resulting from implementation of the CAP interact with development associated with build-out of the County's General Plan and potentially increase those impacts resulting in a cumulatively considerable effect.

The 2011 GPU PEIR concluded that cumulative development would contribute to significant cumulative impacts related to direct and indirect conversion of agricultural resources resulting from the build-out associated with the 2011 GPU. On pages 2.2-17 and 2.2-20 of the 2012 Wind Energy EIR, cumulative impacts related to direct and indirect conversion related to large-scale wind turbine projects were determined to be cumulatively significant due to the inability to guarantee that project-specific mitigation would reduce impacts to a level below significance. Furthermore, because implementation of GHG Reduction Measure E-2.1 would result in the potential conversion of agricultural lands, the project would result in potentially significant direct and indirect impacts and **would result in a considerable contribution** to a significant cumulative agricultural conversion impact (**Impact AG-2**).

Impact Summary

Implementation of 2011 GPU policies, 2011 GPU PEIR mitigation measures (listed above), and Mitigation Measure AG-1 of the 2012 Wind Energy EIR may reduce project and cumulative impacts associated with indirect conversion of agricultural land to non-

agricultural use. However, because project-level mitigation cannot be guaranteed due to the size of development of large-scale renewable systems, project impacts related to implementation of GHG Reduction Measure E-2.1 would remain **potentially significant**. Likewise, implementation of GHG Reduction Measure E-2.1 **would result in a considerable contribution** to a significant cumulative impact.

2.2.4.2 Issue 2: Conflict with Agricultural or Forest Zoning

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Agricultural Resources, the project would have a significant impact if it would conflict with a Williamson Act Contract (contract) or the provisions of the Williamson Act. Additionally, a significant impact would occur if the project would conflict with existing zoning for agricultural use 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)).

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated potential land use conflicts from development with Williamson Act contracts, provisions of the Williamson Act, and existing zoning or agricultural use related to the adoption of the goals and policies contained within the plan and buildout of the land use map. The 2011 GPU PEIR determined that the buildout under the 2011 GPU would result in potentially significant impacts to Williamson Act contract lands, but these impacts would be reduced to a less-than-significant level through the implementation of 2011 GPU policies and mitigation measures described above. The 2011 GPU PEIR determined that less-than-significant impacts related to conflicts with agricultural zoning would occur. The 2011 GPU concluded that cumulative impacts related to Williamson Act and agricultural zoning impacts would not be significant; therefore, the 2011 GPU would not have a considerable contribution to a significant cumulative impact.

The 2011 GPU PEIR determined that impacts related to conflicts with Williamson Act Contract lands and agricultural zoning could be reduced to a level below significance through implementation of a combination of the adopted 2011 GPU policies and a mitigation measure identified in the 2011 GPU PEIR. The discussion of impacts related to conflicts with Williamson Act Contracts and agricultural zoning can be found in Chapter 2.2 Agricultural Resources, pages 2.2-20 through 2.2-23; 2.2-28; and 2.2-31, and is hereby incorporated by reference. Specific policies and mitigation measures related to agricultural land conversion are listed above under Section 2.2.2, Regulatory Framework.

The 2011 GPU PEIR did not analyze impacts to forestry resources.

CAP Impact Analysis

Implementation of the CAP has the potential to result in significant conflicts with Williamson Act Contracts, agricultural zoning, or forest or timberland zoning resulting from implementation of GHG Reduction Measure E-2.1 which would result in the construction of large-scale photovoltaic solar, concentrated solar, wind turbines, and geothermal energy systems that were not explicitly evaluated within the 2011 GPU PEIR. The 2012 Wind Energy EIR evaluated impacts related to the development of large-scale wind turbines and that analysis is summarized below and is hereby incorporated by reference (County of San Diego 2012).

Large-Scale Renewable Energy Infrastructure

Implementation of GHG Reduction Measure E-2.1 would result in the construction of new large-scale renewable energy systems, including large-scale photovoltaic solar, concentrated solar power geothermal systems, and/or wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this Draft SEIR evaluates the potential for impacts at the program level. Specific locations for projects have not been identified. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application. Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are suited for generating the renewable energy source, which, as described above, may be in agricultural areas that may be subject to a Williamson Act contract, and zoned for agricultural use. This could also include areas that are zoned as forest land, timberland, or Timberland Production Zones.

Photovoltaic Solar or Concentrated Solar Systems

The location of large-scale photovoltaic solar systems is limited by the County's Zoning Ordinance Section 6954(b)(2), which requires a MUP for projects over 10 acres. Projects less than 10 acres in size would be required to apply for and receive an Administrative Permit in accordance with Section 6954(b)(1). Concentrated solar systems require a MUP in accordance with Section 6954(b)(3). Photovoltaic solar or concentrated solar systems may be constructed in agricultural areas, which may also be subject to a Williamson Act contract and zoned for agricultural use. As part of the County's discretionary review process, all projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to conflicts with existing agricultural zones and Williamson Act contract, as necessary. However, because of the size and magnitude of the development associated with these systems and because there is no guarantee that each project's mitigation measures would reduce impacts to less than significant, the project may result in potentially significant impacts related to Williamson Act contracts and conflict with the zoning code.

As mentioned above, the County does not have zoning for forest land, timberland, or Timberland Production Zones. Therefore, no impacts related to forest land or timberland conflicts because of photovoltaic solar and concentrated solar would occur.

Large-Scale Wind Turbine Systems

Large-scale production of energy from wind turbines could result in direct impacts related to conflicts with agricultural zoning and Williamson Act contracts as described on page 2.2-12 of the 2012 Wind Energy EIR. All large turbine projects would be required to obtain a MUP and undergo CEQA review, and as part of the County's discretionary review process, all large turbine projects would be required to implement measures to minimize significant agricultural land impacts to less than significant to the extent feasible.

The 2012 Wind Energy EIR also incorporated Mitigation Measure AGR-1 (described below) to reduce Williamson Act contract conflicts. Additional mitigation that was considered in the 2012 Wind Energy EIR, but rejected as infeasible, would have prohibited large wind turbine projects in areas zoned for agriculture, areas under Williamson Act Contract, and areas near Williamson Act Contract lands. This mitigation was rejected because it would conflict with the County's goal to expand renewable energy. Because of the size and magnitude of the development associated with these systems and because there is no guarantee that each project's mitigation measures would reduce impacts to less than significant, the project could result in potentially significant impacts related to Williamson Act contracts and conflicts with agricultural zoning.

As mentioned above, the County does not have zoning for forest land, timberland, or Timberland Production Zones. Therefore, no impacts related to forest land or timberland conflicts because of large-scale wind turbine development would occur.

Geothermal Energy Systems

Depending on location, geothermal energy system components may result in a conflict with agricultural zoning and Williamson Act contracts because of the size and magnitude of the development associated with these systems and because there is no guarantee that each geothermal project would be able to mitigate all impacts to less than significant. Therefore, implementation of the CAP and subsequent geothermal projects may result in significant impacts related to Williamson Act contracts and conflict with the zoning code.

As mentioned above, the County does not have zoning for forest land, timberland, or Timberland Production Zones. Therefore, geothermal energy systems would result in no impact related to forest land or timberland zoning conflicts.

Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to conflicts with agricultural zoning to the extent feasible in compliance with CEQA Guidelines Section 15126.4. However, implementation of all large-scale renewable energy systems and infrastructure would have the potential to result in impacts related to conflicts with Williamson Act Contracts and agricultural zoning. At the programmatic level, it is not possible to ensure that conflicts with zoning would not occur. Because the County does not have forest land, timberland, or

Timberland Production Zones within its jurisdiction, there would be no possibility of conflict.

Therefore, implementation of large-scale renewable energy systems would have a **potentially significant** impact (**Impact AG-3**) to Williamson Act Contracts and agricultural zoning. **No impact** related to forest land zones would occur with implementation of the project.

Cumulative Impacts

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to a regionally significant impact resulting from conflicts with Williamson Act Contracts, agricultural zoning, or forest or timberland zoning. The methodology for determining the cumulative environment described Chapter 1, Project Description, and in Impact AG-2 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts related to Williamson Act Contracts and agricultural zoning resulting from the build-out associated with the 2011 GPU would be less than significant with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. However, as described on page 2.2-18 of the 2012 Wind Energy EIR, there is no guarantee on a project-specific level that mitigation measures would reduce impacts to a level below significant, therefore implementation of GHG Reduction Measure E-2.1 which would result in large-scale renewable energy systems **would result in a considerable contribution** such that a new potentially significant impact related to a conflict with agricultural zoning and Williamson Act Contracts would occur (**Impact AG-4**).

Similarly, potential cumulative impacts related to conflicts with forestry resources was analyzed on page 2.2-19 of the 2012 Wind Energy EIR and it was concluded that large wind turbine projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to forest land or timberland, as necessary. In addition, large wind turbine projects would not require rezones because they are allowed within any zone upon approval of a MUP. Therefore, because there would be no zoning conflicts, the project **would not have a considerable contribution** such that a new significant cumulative forestry conflict impact would occur.

Impact Summary

Implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above, and Mitigation Measure AG-1 of the 2012 Wind Energy EIR may reduce project and cumulative impacts associated with conflicts related to Williamson Act Contracts and agricultural zoning. However, because project-level mitigation cannot be guaranteed due to the size of development of large-scale renewable systems, project impacts related to implementation of GHG Reduction Measure E-2.1 would remain **potentially significant**. Likewise, implementation of GHG Reduction Measure E-2.1 **would result in a considerable contribution** such that a new potentially significant impact related to a conflict with agricultural zoning and Williamson Act Contracts could occur. As described

above, because the County does not contain lands zoned for forest land, timberland, or Timber Land Production, there would be **no Impact** related to project or cumulative conflicts with forestry zoning because of implementation of GHG Reduction Measure E-2.1.

2.2.4.3 Issue 3: Direct and Indirect Conversion or Loss of Forest Land

This section describes potential project and cumulative impacts related to direct and indirect conversion or loss of forest land with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines, the project would result in a significant impact if it would result in the direct or indirect loss of forest land or conversion of forest land to non-forest use.

A potentially significant indirect impact to San Diego County forest land would occur if the project would result in compatibility conflicts with forest land. Land use/forest land interface issues often arise from dust, access restrictions, noise, pest introduction, and conflicts with pesticide use. The type of forest land and the type of adjacent land use would be key considerations in determining forest land compatibility. As an example, forest land would be more likely to be compatible with surrounding quiet activities than noise-generating activities in terms of forest land being managed for wildlife. If these conflicts would result in the conversion of forest land to non-forest land, then a potentially significant impact would occur.

As described above, the County does not include lands zoned specifically for forest land, timberland, or timberland production. However, portions of the federally managed Cleveland National Forest are located within the County and, therefore, it is possible that implementation of the CAP would result in new large-scale renewable projects that are adjacent to federally managed forest lands, or be sited upon lands that could be considered forest lands because of their physical characteristics and the types of forest growth located there. 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. This could occur in many portions of the County, but could only be verified through site-specific analysis. Impacts to forest lands that are not mapped as such could occur because of ground-disturbing activities, such as excavation and grading.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR did not analyze direct or indirect loss or conversion of forest land.

CAP Impact Analysis

Large-Scale Renewable Energy Infrastructure

Implementation of GHG Reduction Measure E-2.1 could result in the construction of new large-scale renewable energy systems, including large-scale photovoltaic solar, concentrated solar power geothermal systems, and/or wind turbines. Specific locations for projects have not been identified. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application. It is likely that suitable locations would include areas that are not highly developed with residential and commercial uses due to the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this Draft SEIR evaluates the potential for impacts at the program level. The potential for the construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR, but potential large-scale wind energy impacts were evaluated in the 2012 Wind Energy EIR and this analysis is summarized below and is hereby incorporated by reference (County of San Diego 2012).

Photovoltaic Solar or Concentrated Solar Systems

Direct loss or conversion of forest lands could occur because of the development of large-scale solar photovoltaic or concentrator solar on forest land. The components and size of solar systems are described for Issue 1, above. The location of large-scale photovoltaic solar systems is limited by the County's Zoning Ordinance Section 6954(b)(2), which requires a MUP for projects over 10 acres. Projects less than 10 acres in size would be required to apply for and receive an Administrative Permit in accordance with Section 6954(b)(1). Concentrated solar systems require a MUP in accordance with Section 6954(b)(3). However, there is nothing that prohibits photovoltaic solar or concentrated solar systems from being constructed on forest land.

Indirect conversion of forest land may happen in several ways that cannot be known until the location and characteristics of solar projects are known. As part of the County's discretionary review process, all solar projects would be evaluated under CEQA at the time the applicant comes into to apply for a MUP. However, to provide a general discussion of example impacts, construction activities may generate dust that could adversely affect adjacent forest land. Such impacts would be temporary, but could be significant depending on the duration and extent of the impact. Solar facilities may also generate noise during operation (e.g., from the equipment that positions the panels during operation), which may affect wildlife in adjacent forest land. This impact could be significant depending on the disturbance to wildlife.

As part of the County's discretionary review process, all future solar projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to conflicts with forest land, as necessary. However, because of the size and magnitude of the development associated with these systems and because there is no guarantee that

each solar project's mitigation measures would reduce impacts to less than significant, the project may result in significant impacts related to forest land conversion.

Large-Scale Wind Turbine Systems

The components and size of large-scale wind turbine systems are described for Issue 1, above. Large-scale production of energy from wind turbines could result in direct impacts from ground disturbance related to forest land conversion as described on pages 2.2-14 through 2.2-15 of the 2012 Wind Energy EIR. Large-scale production of energy from wind turbines could result in indirect forest land conversion development of large wind projects that could result in changes in the environment which due to their nature or location, could result in conversion of forest land to non-forest use as described on page 2.2-16 of the 2012 2012 Wind Energy EIR. All large turbine projects would be required to obtain a MUP and undergo CEQA review, and as part of the County's discretionary review process, all large turbine projects would also be required to implement measures to minimize significant forest land impacts to less than significant to the extent feasible.

The 2012 Wind Energy EIR also incorporated Mitigation Measure AGR-1 and AGR-2 described below in Section 2.2.5 (below) to reduce impacts to forest land conversion by requiring compliance with the County's Guidelines for Determining Significance for Agricultural and Biological Resources and implementation of feasible project-specific mitigation to minimize impacts. The 2012 Wind Energy EIR considered additional mitigation that would have prohibited large wind turbine projects in areas in or near forest land but rejected it as infeasible because this would conflict with the County's goal to expand renewable energy. Therefore, the 2012 Wind Energy EIR concluded that because of the size and magnitude of the development associated with these systems and because there is no guarantee that each wind energy project's mitigation measures would reduce impacts to less than significant, the project may result in significant impacts related to forest land conversion.

Geothermal Energy Systems

The components and size of geothermal energy systems are described for Issue 1, above. Depending on location, geothermal energy system components may result in a conversion of forest land upon development of facilities.

Indirect conversion of forest land may happen in several ways that cannot be known until the location and characteristics of geothermal projects are known. As part of the County's discretionary review process, all geothermal projects would be evaluated under CEQA at the time the applicant comes into to apply for a MUP. However, to provide a general discussion of example impacts, construction activities may generate dust or noise that could adversely affect adjacent forest land. Such impacts would be temporary, but could be significant depending on the duration and extent of the impact. Geothermal facilities may also emit steam from cooling systems during operation, which may affect adjacent forest land. This impact could be significant depending on the extent of the impact. Because of the size and magnitude of the development associated with these systems it may be infeasible to fully mitigate the indirect impact to forest land conversion to below a

level of significance because it is not possible to predict changes to the environment associated with the development of new geothermal energy systems that could result in the conversion of forest land to non-forest use.

All large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of a discretionary application and project-specific mitigation would minimize or eliminate impacts to forest land to the extent feasible in compliance with CEQA Guidelines Section 15126.4. Additionally, projects would be required to comply with all applicable federal, state, and local regulations that protect forest resources. However, at a programmatic level, it is not possible to ensure that impacts related to forestry resources would be reduced to a level below significance. As a result, implementation of all large-scale renewable energy systems and infrastructure would have the potential to result in impacts related to direct or indirect conversion or loss of forest lands. Therefore, implementation of GHG Reduction Measure E-2.1 would have a **potentially significant** impact to direct or indirect conversion or loss of forest land (**Impact AG-5**).

Cumulative Impacts

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to a regionally substantial impact resulting from direct or indirect conversion or loss of forest resources. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact AG-2 above applies for this cumulative discussion.

The 2011 GPU PEIR did not evaluate impacts related to forest resources. However, as described on page 2.2-19 to 2.2-20 of the 2012 Wind Energy EIR, all large-scale wind projects would be evaluated under CEQA and required to implement the maximum feasible mitigation measures. However, because there is no guarantee on a project-specific level that mitigation measures would reduce impacts to a level below significant, therefore implementation of GHG Reduction Measure E-2.1 which would result in large-scale renewable energy systems **would result in a considerable contribution** such that a new potentially significant cumulative conversion or loss of forest resources would occur (**Impact AG-6**).

Impact Summary

The 2011 GPU PEIR did not evaluate impacts related to forestry resources, however, implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above may reduce project and cumulative impacts associated with direct or indirect conversion or loss of forest land to non-forest land. Additionally, implementation of 2012 Wind Energy EIR Mitigation Measures M-AGR-1 and M-AGR-2 which require large-scale wind projects to adhere to the County's Guidelines for Determining Significance for Agriculture and Biological Resources and implementation of project-specific mitigation, would also reduce impacts to forest lands. However, because project-level mitigation cannot be guaranteed due to the size of development of large-scale renewable systems, project impacts related to implementation of GHG Reduction Measure E-2.1 would remain

potentially significant. Likewise, implementation of GHG Reduction Measure E-2.1 **would result in a considerable contribution** such that a new potentially significant cumulative direct or indirect conversion or loss of forest lands impact would occur.

2.2.5 Mitigation

2.2.5.1 Issue 1: Direct or Indirect Conversion of Agricultural Resources

The 2012 Wind Energy EIR included the following mitigation measure to reduce the potentially significant direct or indirect impacts related to direct or indirect conversion of agricultural resources from large-scale wind turbine projects:

Mitigation Measure M-AGR-1: During the environmental review process for future MUPs for wind turbines, 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.

As described in Section 2.2.4.1, additional wind turbine mitigation was considered but rejected as infeasible through the 2012 Wind Energy EIR. No other feasible mitigation is available. Mitigation Measure M-AGR-1 shall be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the CAP and shall be applied to all large-scale renewable energy projects including but not limited to solar photovoltaic, solar concentrator, wind turbine, and utility-scale geothermal systems during the discretionary review process which would occur as a condition of receiving a MUP. As described during the impacts analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to direct or indirect conversion of agricultural resources to the extent feasible in compliance with CEQA Guidelines Section 15126.4. However, because of the uncertainty of the types, locations, and scale of future renewable energy projects, it is not possible to guarantee that all impacts to agricultural resources would be reduced to a level below significance. Mitigation Measures M-AGR-1 from the 2012 Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as follows:

CAP Mitigation Measure M-AGR-1: During the environmental review process for future MUPs for large-scale renewable energy projects, 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.

Additional mitigation was contemplated as part of this Draft SEIR that would implement a development cap upon large-scale renewable energy projects. This mitigation was rejected as infeasible because it may reduce the effectiveness of GHG Reduction Measure E-2.1 and achievement of the County's 2030 GHG emissions reduction target. It is unknown how many numbers and types of renewable large-scale renewable energy facilities would be required to meet the GHG reduction goals of the CAP because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available. Therefore, as described above in Section 2.2.4.1, even with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AGR-1 (listed above) that prevent significant impacts to agricultural resources, impacts remain significant and unavoidable.

No other feasible project-related mitigation beyond compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual projects under the CAP. The project's impacts related to direct or indirect conversion of agricultural resources would remain **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact to direct or indirect conversion would occur.

2.2.5.2 Issue 2: Conflict with Agricultural or Forest Zoning

CAP Mitigation Measure M-AGR-1 shall be incorporated into the 2011 MMRP for the CAP and shall applied to all large-scale renewable energy projects including but not limited to solar photovoltaic, solar concentrator, wind turbine, and utility-scale geothermal systems during the discretionary review process which would occur as a condition of receiving a MUP. As described during the impacts analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to agricultural or forest zoning to the extent feasible in compliance with CEQA Guidelines Section 15126.4. However, because of the uncertainty of the types, locations, and scale of future renewable energy projects, it is not possible to guarantee that all impacts to agricultural or forest zoning would be reduced to a level below significance. Additional mitigation that would implement a development cap upon large-scale renewable energy projects was considered but rejected as infeasible because it may preclude the feasibility of GHG Reduction Measure E-2.1 and achievement of the County's 2030 GHG emissions reduction target. It is unknown how many numbers and types of renewable large-scale renewable energy facilities would be required to meet the GHG reduction goals of the CAP because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

Therefore, as described above in Section 2.2.4.2, even with implementation of the 2012 Wind Energy EIR mitigation measure M-AGR-1, impacts would remain significant and unavoidable because of the scale and nature of the projects and possibility of the construction of multiple projects in a similar vicinity. Individual renewable energy projects

that would result in agricultural or forest zoning impacts would be required to comply with all federal, state, and local regulations.

No other feasible project-related mitigation beyond this compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual projects under the CAP. The project's impacts related to Williamson Act contract and agricultural zoning conflicts would remain **significant and unavoidable** and the project **could result in a considerable contribution** such that a new significant cumulative impact to agricultural land use conflicts would occur.

There would be **no impact** related to conflict with zoning for forest land, timberland, or timberland production zones. Therefore, no mitigation is required.

2.2.5.3 Issue 3: Direct or Indirect Conversion or Loss of Forest Land

The 2012 Wind Energy EIR adopted mitigation measure M-AGR-1, described in Issue 1, and the M-AGR-2 to reduce impacts related to direct or indirect conversion or loss of forest land.

Mitigation Measure M-AGR-2: During the environmental review process for future MUPs for wind turbines, the County Guidelines for Determining Significance for Agricultural and 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.

As described in Section 2.2.4.3, additional wind turbine mitigation was considered but rejected as infeasible. No other feasible mitigation is available.

Mitigation Measure M-AGR-1 and M-AGR-2 shall be incorporated into the 2011 MMRP for the CAP and shall applied to all large-scale renewable energy projects including but not limited to solar photovoltaic, solar concentrator, wind turbine, and utility-scale geothermal systems during the discretionary review process which would occur as a condition of receiving a MUP. As described during the impacts analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to direct or indirect conversion of forest resources to the extent feasible in compliance with CEQA Guidelines Section 15126.4. However, because of the uncertainty of the types, locations, and scale of future renewable energy projects, it is not possible to guarantee that all impacts related to direct or indirect conversion of forest resources would be reduced to a level below significance. Mitigation Measures M-AGR-2 from the 2012 Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as follows:

CAP Mitigation Measure M-AGR-2: During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for

Determining Significance for Agriculture and 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.

Additional mitigation was contemplated as part of this Draft SEIR that would implement a development cap upon large-scale renewable energy projects. That mitigation was considered but rejected as infeasible because it may preclude the feasibility of GHG Reduction Measure E-2.1 and achievement of the County's 2030 GHG emissions reduction target. It is unknown how many numbers and types of renewable large-scale renewable energy facilities would be required to meet the GHG reduction goals of the CAP because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available. Therefore, as described above in Section 2.2.4.3, even with implementation of the adopted 2011 GPU policies, the 2011 GPU PEIR mitigation measures, and the CAP Mitigation Measures M-AGR-1 and M-AGR-2 (listed above), impacts would remain significant and unavoidable because of the scale and nature of the projects and possibility of the construction of multiple projects in a similar vicinity. Individual renewable energy projects that would result in direct or indirect impacts related to conversion of forest resources would be required to comply with all federal, state, and local regulations.

No other feasible project-related mitigation beyond compliance with County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual projects under the CAP. The project's impacts related to forest land conversion would remain **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact to forest land conversion would occur.