3.1.1 Agricultural Resources

This section evaluates impacts to agricultural resources of the Project site and vicinity that could result from implementation of the proposed JVR Energy Park Project (Proposed Project). The analysis focuses on resultant effects to Prime Farmland, Unique Farmland, or Farmland Of Statewide Importance; conflicts with existing zoning for agricultural use, forestland, or a Williamson Act Contract; and loss or conversion of forest land as generated by the Proposed Project.

Information contained in this section is based on the following technical documentation:

• Agricultural Resources Report for the JVR Energy Park Project (Appendix O)

Comments received in response to the Notice of Preparation (NOP) included concerns regarding eliminating agricultural lands due to soil degradation. This concern is addressed in the Agricultural Resources Report and this section of the Environmental Impact Report (EIR). A copy of the NOP and comment letters received in response to the NOP is included in Appendix A of this EIR.

3.1.1.1 Existing Conditions

This section summarizes the existing agricultural resources within the Project area; identifies the resources that could be affected by the Proposed Project; and summarizes the indicators used to assess soil quality, including land use classifications, Stories Index ratings, and farmland mapping and monitoring designations. This section also discusses the agricultural setting and land use designation for the Project site.

This section presents agricultural data and analysis that is based on the information provided in the Land Use Element and the Conservation and Open Space Element of the 2011 San Diego County General Plan (County of San Diego 2011a, 2011b), the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements – Agricultural Resources (County of San Diego 2015), the County of San Diego Crop Statistics and Annual Report (County of San Diego 2017), and the Mountain Empire Subregional Plan (County of San Diego 2016).

Regional Overview

San Diego County has the fourth highest number of farms of any county in the country, and the third highest number of farms of any county in California. Agriculture is the fifth largest component of the County of San Diego's (County) economy, and provides an array of economic, environmental, and social benefits for the County (County of San Diego 2011b). Agriculture in the County is dependent on the region's unusual microclimates and often has very little relationship to the quality of the soil. Much of the County's climate supports a year-round growing

season that facilitates successful small farms and crop diversification that produces more than 200 agricultural commodities, including high-value specialty crops, nursery products, and fruits (County of San Diego 2011b). In 2017, the value of commercial agriculture in the County rose 1.7% from 2016, largely driven by a 16% increase in the value of vegetable and vine crop products produced. Total production of agriculture in the County was estimated at more than \$1.7 trillion and uses approximately 243,029 acres of land in the region (County of San Diego 2017). The highest acreages are for nursery and cut flower products (12,356 acres), fruit and nuts (33,174 acres), and vegetables (3,545 acres) (County of San Diego 2017).

The Project site is located entirely within the Jacumba Subregional Group Area of the Mountain Empire Subregional Plan area. The Mountain Empire Subregional Plan includes goals and policies. The Jacumba Subregional Planning Area has an adopted vision statement (County of San Diego 2011b).

The Mountain Empire Subregional Plan supplements the existing elements of the County General Plan and provides a basis for regulation for this specific unincorporated area. The subregion is rural, but the topography, lack of easily accessible water, and poor soil quality offer little opportunity for instituting any large-scale agricultural operations. However, the Mountain Empire Subregional Plan determined a possible benefit of promoting agricultural uses in the subregion, specifically in Tecate (County of San Diego 2016).

Project Site

The Project site is entirely on private land in the southeastern unincorporated County, immediately east of the community of Jacumba Hot Springs. The Project site is adjacent to residences within the community of Jacumba Hot Springs to the west, but is largely surrounded by undeveloped land. Land ownership surrounding the Project site consists of a mixture of private and public lands. The Project site includes right-of-way easements for Old Highway 80, San Diego Gas & Electric, and the San Diego and Arizona Eastern Railway.

The existing Regional Category for the 1,356-acre Project site is Village, except for an approximately 38-acre parcel in the easternmost portion of the site that is designated as Rural. The General Plan land use designation for most of the Project site is Specific Plan Area (SPA); one parcel is designated as Rural Lands 40 (RL-40) and another parcel is Village Residential (VR-2). Portions of the parcel on the west side of the Project site are designated Public Agency Lands and Rural Lands 80 (RL-80). Zoning for most of the Project site is Specific Plan (S-88). One parcel in the easternmost portion of the site is zoned General Rural (S-92). Parcels in the vicinity of the Jacumba Airport are zoned Open Space, Specific Plan (S-88), and one very small parcel within the village area is zoned Rural Residential (RR) (County of San Diego 2011a).

Historical and Current Agricultural Use

Historical

Historically, the Project site has been used for dairy and agricultural operations. A Historical Resources Technical Report (Appendix D to the Cultural Resources Report (Appendix E)) includes information regarding the history of the Project site. In addition, historical aerial photographs dated 1954, 1980, 1989, 1996, 2002, 2005, 2009, 2010, 2012, 2014, and 2016 were reviewed as part of the Phase I Environmental Site Assessment (Appendix G) to assess the history of the Project site. Based on the aerial photograph review, the Project site was used as agricultural land from at least 1954 to before 1980, then again from at least 2002 through at least 2012; the land appeared to be fallow from 1980 until 2002 (Figure 3.1.1-1, Historical Agricultural Land). According to the Agricultural Resources Report (Appendix O), the Project site is composed of approximately 34% Department of Conservation Farmland Mapping and Monitoring Program (FMMP) Important Farmland: 35.3 acres of Farmland of Local Importance, 275 acres of Prime Farmland, 143.4 acres of Farmland of Statewide Importance, and 4.3 acres of Unique Farmland (Appendix O).

Current

As seen in Figure 3.1.1-2, Zone of Influence Important Farmland, portions of the Project site are designated under the state FMMP as "Farmland of Local Importance," "Farmland of Statewide Importance," "Prime Farmland," and "Unique Farmland." However, most of the Project site is "Other Land," which is defined as land that does not meet the criteria of any other FMMP category (California Department of Conservation 2010), and no farmland designations exist on those portions of the Project site. Common examples of land designated as "Other Land" include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confirmed livestock, poultry, or aquaculture facilities; strip mines; borrow pits; and water bodies smaller than 40 acres (California Department of Conservation 2017). Adjacent and nearby land uses include residential and commercial to the south west, commercial to the north, an airport to the southeast, and undeveloped land.

The Guidelines for Determining Significance and Report Format and Content Requirements – Agricultural Resources (County Guidelines) (County of San Diego 2015) requires that agricultural operations within 0.25 miles of a project site be identified, including lands under Williamson Act contracts, FMMP designations, agricultural preserves, or any active agricultural operations. The Proposed Project's surrounding parcels do not meet the criteria for any FMMP category; there are no Williamson Act Contract lands within 0.25 miles of the Project site, and no agricultural preserves exist within 0.25 miles of the Project site (Appendix O). An agricultural preserve is an area devoted to agricultural use, open space use, recreational use, or any combination of such uses, and compatible uses that are designated by the County. Agricultural preserves are established for

defining the boundaries of those areas where the County will be willing to enter into contracts pursuant to the Williamson Act. Landowners within a preserve may enter into a contract with the County to restrict their land to the uses stated above, whereby the assessment on their land will be based on its restricted use rather than on its market value.

Additionally, there are no active irrigated croplands or other crop production within the Proposed Project's zone of influence (ZOI¹). Irrigated crop farming operations occurred historically on site, but based on current site visits and environmental field surveys conducted for the Proposed Project, there is no evidence of any agricultural activities currently occurring on the Project site. Small ranch operations are scattered throughout the Project region.

Climate

Jacumba Hot Springs experiences warm summer months and cool winters. Average temperatures vary greatly within the region. Mean maximum temperatures in the summer months reach the high-80s to low-90s degrees Fahrenheit. Temperatures may fall below freezing in the winter, with snow levels occasionally below 2,500 feet (WRCC 2019).

There are two generally used climate rating systems that can be applied to a particular area to determine what plants and agricultural crops are appropriate for that area: the United States Department of Agriculture (USDA) Hardiness Rating and the Sunset Climate Zone, described below.

USDA Hardiness Rating. The Project site is in USDA Hardiness Zone 8b (USDA 2012). This zone is defined as having average minimum temperatures between 15°F and 20°F. Popular plants that tend to grow very well in Zone 8b include broccoli, cauliflower, cabbage, lettuce, spinach, peas, onions, potatoes, tomatoes, peppers, beans, and squash (National Gardening Association 2019).

Sunset Climate Zone. The County has assigned climate zones as a way of accounting for the variability of microclimate conditions and climate suitability throughout the County. The Project site is located within Climate Zone 13 on the County's Area Climates and Generalized Western Plant Climate Zones ("Sunset Zones") map (County of San Diego 2006). Zone 13 covers lowelevation desert areas (considered subtropical) and is the most extensive of the County's desert plant climate zones. Zone 13 includes the extensive agricultural uses in the Borrego Valley. Zone 13 is assigned a moderate rating due to the temperature extremes characteristic of this zone. These temperature extremes exclude some of the subtropical plants grown in Zones 22 to 24, but

The zone of influence (ZOI) methodology is taken from the Department of Conservation's Land Evaluation Site Assessment (LESA) Model and includes a minimum area of 0.25 miles beyond project boundaries and includes the entire area of all parcels that intersect the 0.25-mile boundary. The ZOI developed by the Department of Conservation is the result of several iterations during development of the LESA Model for assessing an area that would generally be a representative sample of surrounding land use (County of San Diego 2015).

numerous subtropicals with high heat requirements thrive in this climate, such as dates, grapefruit, and beaumontia and thevetia (ornamentals) (County of San Diego 2006).

<u>Water</u>

There are five existing wells on the Project site. The Proposed Project would involve the use of existing on-site wells (Well #2 and Well #3) for groundwater supply. The Proposed Project is anticipated to require up to 112 acre-feet during construction (approximately 1 year), 10 acre-feet per year for ongoing operations and maintenance, and 50 acre-feet for decommissioning and dismantling of the solar facility. The current groundwater storage in the Jacumba Valley alluvial aquifer, including the portion of the alluvial aquifer located in Mexico, is conservatively estimated to be 9,005 acre-feet based on groundwater level data and updated interpreted depth to bedrock using additional well logs (see Appendix J).

Soil Quality

According to the USDA Natural Resources Conservation Service (USDA NRCS 2014), the Project site is composed of 12 soil types that fit under five general categories: Indio soils, Lost Posta soils, Ramona soils, Reiff soils, and Rositas soils (see Table 3.1.1-1, Soil Quality). The USDA Soil Survey report for the San Diego area classifies crop suitability for various soil types. Indio soils comprise 34.44% of the total on-site soil type and are used for irrigated cropland and livestock grazing. La Posta soils contain brown, slightly acidic and neutral, loamy coarse sand formed from weathered acidic igneous rock. Ramona soils comprise 2.22% of the total on-site soil type and are used mostly for production of grain, grain-hay, pasture, irrigated citrus, olives, truck crops, and deciduous fruits. Reiff soils comprise 2.01% of the total on-site soil type, and Rositas soils comprise 5.36% of the total on-site soil type.

Slope

The viability of soil can be based on a number of factors, including the soil type's slope, which affects the soil's susceptibility to erosion. Indio soils are on alluvial fans, lacustrine basins, and flood plains, and have slopes of 0% to 3%. Reiff soils are on flood plains and alluvial fans, and slopes are 0% to 9%. La Posta soils range from 5% to 30% slopes. Rositas soils are on dunes and sand sheets; slope ranges from 0% to 30% with hummocky or dune micro relief.

3.1.1.2 Regulatory Setting

There are laws, regulations, policies, and programs that aim to protect, preserve, and promote agriculture. The following discussion details the most relevant regulations, policies, and programs that could be applicable to the Proposed Project and agricultural resources.

3.1.1.2.1 Federal Regulations

No federal regulations are applicable to the Proposed Project.

3.1.1.2.2 State Regulations

Department of Conservation Farmland Mapping and Monitoring Program

In response to the need to assess the location, quality, and quantity of agricultural lands and conversion of such lands over time, in 1982, the California Department of Conservation established the FMMP. The goal of the FMMP is to provide consistent and impartial data to decision makers to assess the suitability of agricultural lands in California. The FMMP categories are based on local soil characteristics and irrigation status, with the best-quality land identified as Prime Farmland or Farmland of Statewide Importance. Some soils in the County are listed as Candidate Soils for Prime Farmland or Statewide Importance, but these soils include a much broader range of soils than the Prime Agricultural Land definition in California Government Code Section 51201(c) (County of San Diego 2015). The FMMP classifies land into five mapping categories based on soil and climatic conditions: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. In addition, the FMMP identifies nonagricultural lands as either Urban and Built-Up Land or Other Land. Important Farmland Maps are updated every 2 years.

The FMMP identifies farmlands as follows (California Department of Conservation 2010):

- **Prime Farmland.** Prime Farmland has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agriculture production at some time during the 4 years prior to the mapping date.
- **Farmland of Statewide Importance.** Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- Unique Farmland. Unique Farmland consists of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but it may include nonirrigated orchards or vineyards, as found in some climatic zones in California. Land must have been cropped at some time during the 4 years prior to the mapping date.
- **Farmland of Local Importance.** Land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee. Based

on the County's Guidelines (County of San Diego 2015), the following lands are to be included in the "Farmland of Local Importance" category:

- All farmable lands within San Diego County that do not meet the definitions of Prime,
 Statewide, or Unique but are currently irrigated pasture or nonirrigated crops.
- Nonirrigated land with the soils qualifying for Prime Farmland or Farmland of Statewide Importance.
- Lands that would have Prime or Statewide designation and have been improved for irrigation but are now idle.
- o Lands with a General Plan Land Use designation for agricultural purposes.
- o Lands that are legislated to be used only for agricultural (farmland) purposes.
- **Grazing Land.** Land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for Grazing Land is 40 acres.

Williamson Act

The California Land Conservation Act of 1965, commonly known as the Williamson Act (Government Code Section 51200 et seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based on farming and open space uses as opposed to the full potential market value of the land. The goal of the Williamson Act program is to encourage preservation of agricultural land and prevent its premature conversion to urban uses.

3.1.1.2.3 Local

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

This policy establishes procedures for implementing Williamson Act contracts in the County and for establishing agricultural preserves. This County Board of Supervisors policy also outlines criteria for the establishment, modification, and de-establishment of an agricultural preserve. An agricultural preserve is an area devoted to agricultural use, open space use, recreational use, or any combination of such uses, and compatible uses that are designated by the County. Preserves are established for defining the boundaries of those areas where the County will be willing to enter into contracts pursuant to the Williamson Act. Landowners within a preserve may enter into a contract with the County to restrict their land to the uses stated above, whereby the assessment on their land will be based on its restricted use rather than on its market value. The Project site is not located on an agricultural preserve.

County of San Diego General Plan

Agricultural resources are covered in both the Land Use Element and the Conservation and Open Space Element of the County's General Plan. Each element is discussed below.

Land Use Element

Despite numerous constraints to agriculture in the County, such as high water and land costs, the County has a robust agricultural economy. Agriculture contributes to the character of the County, particularly in the Semi-Rural and Rural Lands regional categories, supplying County residents with local agricultural products and contributing significantly to the local economy. A goal of these regional land use categories is the preservation of local agriculture, which includes a diverse mix of high-value commodities and takes advantage of a long—in some cases year-round—growing season. Incompatibility of adjacent land uses can present a constraint to the viability of local agriculture. As residential and other potentially incompatible development occurs in traditionally agricultural areas, careful attention should be given to the compatibility of these nonagricultural uses and to site design techniques that would reduce or avoid potential conflicts. An applicable General Plan goal and policies are as follows (County of San Diego 2011a):

- Policy LU-5.3, Rural Land Preservation. Ensure the preservation of existing open space
 and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors,
 wetlands, watersheds, and groundwater recharge areas) when permitting development
 under the Rural and Semi-Rural Land Use Designations. (Open space and rural lands are
 primary areas that provide carbon sequestration benefits for the Region.)
- **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.
- Goal LU-7, Agricultural Conservation. A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.
 - o **Policy LU-7.1, Agricultural Land Development**. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

Conservation and Open Space Element

The primary focus on the Conservation and Open Space Element is to provide direction to future growth and development in the County as it relates the utilization of natural and cultural resources, the protection and preservation of open space, and the provision of park and recreation resources

(County of San Diego 2011b). The following goal and policies in the Conservation and Open Space Element relate to the Proposed Project:

- Goal COS-6, Sustainable Agricultural Industry. A viable and long-term agricultural industry and sustainable agricultural land uses in the County of San Diego that serve as a beneficial resource and contributor to the County's rural character and open space network.
 - o **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 nonintensive 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.
 - Discourage development that is potentially incompatible with intensive agricultural uses, including schools and civic buildings where the public gather, daycare facilities under private institutional use, private institutional uses (e.g., private hospitals or rest homes), residential densities higher than two dwelling units per acre, and offices and retail commercial.
- 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.
 - Recreational and open space uses can serve as an effective buffer between agriculture and development that is potentially incompatible with agriculture uses.

Mountain Empire Subregional Plan

The Mountain Empire Subregional Plan contains goals and policies that outline growth management and resource preservation for the communities of Tecate, Potrero, Boulevard, and Jacumba. The following goal relates to agricultural resources (County of San Diego 2016):

• **Agricultural Goal:** Encourage the expansion and continuance of agricultural uses in the subregion.

County of San Diego Purchase of Agricultural Conservation Easement Program

The County has initiated an agricultural conservation program known as the Purchase of Agricultural Conservation Easement (PACE) Program. The "Mitigation Bank and Credits" are an expanded component of the PACE Program, approved by the Board of Supervisors in September 2014. With this expanded component, easement lands acquired by the County under the PACE Program can be used as off-site mitigation for agricultural impacts resulting from private development projects. Applicants may purchase PACE credits to mitigate for agricultural impacts at a 1:1 ratio. One credit is equal to 1 acre of agricultural land (County of San Diego 2014).

To purchase PACE mitigation credits, a project applicant must have an approved discretionary project with a condition of approval requiring agricultural mitigation (County of San Diego 2014). Since 2013, 24 properties covering approximately 1,760 agricultural acres have been preserved at an average cost of \$2,859 (County of San Diego 2018). The cost of credits is determined by the fee in effect on the date of purchase. Credits, which are non-refundable and non-transferrable, can only be purchased after a project has been approved.

County of San Diego Local Agricultural Resources Assessment Model

In determining whether impacts to agricultural resources are significant, the California Environmental Quality Act (CEQA) Guidelines references the California Agricultural Land Evaluation and Site Assessment Model, prepared by the California Department of Conservation, as an optional methodology that may be used to assess the relative value of agriculture and farmland.

In the past, the Land Evaluation and Site Assessment Model has been applied to various agricultural properties throughout the County to assess agricultural importance in association with proposed discretionary land use permits. After several years of practical experience with application of the Land Evaluation and Site Assessment Model in San Diego County, the inadequacy of the model in capturing the unique and varied character of San Diego agriculture has become apparent.

The County approved a local methodology that is used to determine the importance of agricultural resources in the unincorporated areas of the County, known as the Local Agricultural Resources

Assessment (LARA) Model. The LARA Model takes into account the following factors to determine the importance of agricultural resources: three Required Factors (water, climate, and soil quality) and three Complementary Factors (surrounding land uses, land use consistency, and slope). The analysis provided in Section 3.1.1.3 provides descriptions of the Project site's rating for each LARA Model factor, including justification for the factor ratings assigned to the Project site. Each factor received a rating of high, moderate, or low importance based on site-specific information, as detailed in the LARA Model Instructions (County of San Diego 2015) (see Appendix A of Appendix O, LARA Model Instructions). The factor ratings for the Project site are summarized below. The final LARA Model result is based on the combination of factor ratings, in accordance with the County Guidelines (see Table 2, Interpretation of LARA Model Results, in County of San Diego 2015).

3.1.1.3 Analysis of Project Impacts and Determination as to Significance

Per the County's Agricultural Guidelines (County of San Diego 2015), an affirmative response to, or confirmation of, any one of the following guidelines will generally be considered a significant impact to agricultural resources with project implementation. Four categories of potential significant impacts could pertain to the Proposed Project: direct impacts to important on-site agricultural resources, indirect impacts to agricultural resources, conflicts with agricultural zoning or Williamson Act Contracts, and cumulative impacts to surrounding agricultural resources with Proposed Project implementation. Each of these potential impact categories is assessed in the following subsections, with the significance guidelines included in each subsection.

For the purposes of this analysis, the switchyard (as described in Chapter 1, Project Description, Location, and Environmental Setting) is a component of the Proposed Project and has been analyzed as part of the whole of the action. However, this EIR highlights the specific analysis of the operation of the switchyard under each threshold of significance in the event responsible agencies have CEQA obligations to the switchyard.

3.1.1.3.1 Definition of Impacts

This section defines the types of impacts considered to analyze the potential effects of the Proposed Project on agricultural resources. These impacts are discussed in more detail below.

Direct Impacts

Direct impacts occur when a project would adversely impact locally important agricultural soils on a site that is determined to be important pursuant to the County LARA Model. In San Diego County, important agricultural soils include not only soils with the USDA Land Capability Classification ratings of I and II, or Storie Index ratings of 80 or higher, but also soils of lesser quality as defined by the soil candidate listing for Prime Farmland and Farmland of Statewide

Importance compiled by the USDA Natural Resources Conservation Service for San Diego County. Agricultural resources may be considered locally important even though soil quality in San Diego County is generally low, with very few soils having the above-stated Land Capability Classification and Storie Index ratings that define Prime Agricultural Land.

When considering the significance of direct impacts, the focus of a CEQA analysis is on impacts to physical resources. In the case of agriculture, the physical resources include those areas of the site that contain soil of a sufficiently high quality to support crop production. The California Department of Conservation's FMMP categories are based on local soil characteristics and irrigation status, with the best quality land identified as Prime Farmland or Farmland of Statewide Importance. The FMMP soil criteria for Prime Farmland and Farmland of Statewide Importance are the measures used to define high-quality soil. This approach recognizes the market-driven nature of agriculture by focusing on the underlying physical resource in the analysis of impacts versus focusing on the actual agricultural commodity that may be produced at a site. By focusing on underlying physical resources, this approach recognizes that conversion of a particular agricultural use may not be a significant environmental impact if the agricultural use is not dependent on a valuable agricultural resource, such as good soil (County of San Diego 2015).

Indirect Impacts

Various project features can cause significant indirect impacts to agriculture. One example is the placement of public trails on agricultural lands. Trails on agricultural lands can result in increased trespassing, theft, and disease to crops. A project proposed near an active agricultural use also has the potential to cause significant indirect effects to agricultural resources because of the potential incompatibility between the proposed use and existing agricultural activities. Adverse impacts caused by incompatible development near agricultural uses include the following (County of San Diego 2015):

- 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
- Crop and irrigation spraying limitations due to urban use encroachment
- Introduction of urban use pollutants entering farm water sources
- Competition for water
- Development affecting recharge of groundwater

- Soil erosion and stormwater 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
- Interruption of cold air drainage

3.1.1.3.2 Direct Impacts to Important Agricultural Resources

Guidelines for the Determination of Significance

For the purpose of this EIR, the County's Guidelines for Determining Significance and Report Format and Content Requirements – Agricultural Resources (County of San Diego 2015) was used to evaluate direct, indirect, and cumulative impacts of the Proposed Project. Each general subject area is broken into more specific County guidelines, and lettered accordingly, to provide additional clarity on this complex resource topic.

According to the County's Guidelines, significant impact to important on-site agricultural resources would result if (County of San Diego 2015):

The project site has important agricultural resources as defined by the Local Agricultural Resources Assessment (LARA) Model; and the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of the Project site for agricultural use.

Analysis

A portion of the Project site was historically farmed, but based on site visits and environmental field surveys conducted for the Proposed Project, there is no evidence of current agricultural activity occurring on the Project site (see Appendix D of Appendix E).

Zoning for most of the Project site is Specific Plan (S-88). One parcel in the easternmost portion of the site is zoned General Rural (S-92). Parcels in the vicinity of the Jacumba Airport are zoned Specific Plan (S-88), and one very small parcel within the village area is zoned Rural Residential (RR).

As previously discussed, the LARA Model takes into account the following primary factors to determine the importance of agricultural resources: water, climate, and soil quality. In addition, the LARA Model takes into account the following three additional Complementary Factors:

surrounding land uses, land use consistency, and slope. The analysis of the Project site using the LARA Model is discussed below.

Primary LARA Model Factors

With regards to water, the Proposed Project's location in the Jacumba Valley alluvial aquifer, as well as the presence of existing wells, would imply that the water rating is moderate based on the County Guidelines (see Table 3, Water Rating, in County of San Diego 2015). Due to the location of the Project site outside of the County Water Authority Area, the presence of wells, and the location on an aquifer, the Proposed Project's water quality rating is moderate.

The Project site is located within Climate Zone 13 on the County's Area Climates and Generalized Western Plant Climate Zones ("Sunset Zones") map (County of San Diego 2006). According to Table 6 in the County Guidelines, Zone 13 is a "Moderate" LARA Model Rating (County of San Diego 2015). Zone 13 covers low-elevation desert areas (considered subtropical) and is the most extensive of the County's desert plant climate zones. Zone 13 includes the extensive agricultural uses in the Borrego Valley. Zone 13 is assigned a moderate rating due to the temperature extremes characteristic of this zone.

According to the Soil Quality Matrix Interpretation shown in Table 8 of the County Guidelines (County of San Diego 2015), the Project site has a soil quality rating of moderate importance, and approximately 600 acres is available for agricultural use (see Figure 3.1.1-3, Soils). The Proposed Project's LARA Model determined the soil agricultural viability rating to be moderate, since the Project site has a Soil Quality Matrix score of less than one-third, but the Project site has over 10 contiguous acres of Prime Farmland or Statewide Importance Soils (Appendix O). These soils on site have a Land Capability Classification ratings of I, IIe, IIIs, or IIIe. Class I contains soils having few limitations for cultivation, Class II contains soils having some limitations for cultivation, and Class III contains soils having severe limitations for cultivation. The main limitations are risk of erosion; interference of water with plant growth; and shallow, droughty, or stony soils. The soils found on site have a Storie Index rating ranging between Grade 1 (81–100, excellent quality) and Grade 4 (21–40, poor quality).

Complementary LARA Model Factors

In regard to surrounding land uses, the overall area of the ZOI is approximately 11,254 acres, of which the majority is composed of parcels greater than 2 acres containing elements of rural lifestyle. There are no existing agricultural preserves within the ZOI. More than 50% of the land within the ZOI is compatible with agriculture; therefore, the surrounding land use rating is considered "high."

In regard to land use consistency, the median parcel size within the Project site is approximately 22.1 acres (962,676 square feet), and the median parcel size within the Proposed Project ZOI is 0.2 acres (8,712 square feet) (refer to Appendix B of Appendix O for a list of the ZOI parcels and acreages). Therefore, since the Project site's median parcel size is larger than the Proposed Project ZOI's median parcel size by 10 acres or more, the Land Use Consistency Rating is "low."

The average slope for the area of the Project site that is available for agricultural use is 0% to 10% (see Figure 3.1.1-4, Slopes). Therefore, based on Table 11, Slope Rating, in the County Guidelines (County of San Diego 2015), the Project site would have a slope rating of "high" due to average slope being less than 15%.

LARA Model Result

Based on the LARA Model factor ratings, shown in Table 3.1.1-2, LARA Model Factor Ratings, the required factors of water, climate, and soil quality are rate "moderate." For the Complementary Factors, surrounding land uses and slope are rated "high," and land use consistency is rated "low." Therefore, as shown in Table 3.1.1-2 and Table 3.1.1-3, Interpretation of LARA Model Results, the Project site falls into Scenario 6, which means that the Project site is not considered an important agricultural resource.

Although the Proposed Project would impact approximately 600 acres of County-designated Candidate Soils for Prime Farmland or Farmland of Statewide Importance, as discussed above, the Project site has been determined not to be an important agricultural resource. Therefore, direct impacts to on-site agricultural resources would be **less than significant**.

Switchyard

The Proposed Project would include a 138-kilovolt switchyard located adjacent to the proposed collector substation. The size of the switchyard would be approximately 140,000 square feet.

The switchyard would be built on land designated under the state FMMP as "Other Land" (California Department of Conservation 2010), which does not meet the criteria of any other FMMP category (California Department of Conservation 2010), and no farmland designations exist on those portions of the Project site. Therefore, the switchyard would not be built on land designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. Therefore, there would be **no impact** as a result of the switchyard.

3.1.1.3.3 Indirect Impacts to Agricultural Resources

Guidelines for the Determination of Significance

For purposes of this EIR, the County's Guidelines for Determining Significance and Report Format and Content Guidelines – Agricultural Resources (County of San Diego 2015) applies to the direct and indirect impact analyses and the cumulative impact analysis.

A significant indirect impact to important off-site agricultural resources would result if:

- The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation² or land under a Williamson Act contract (Contract) and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
- The project proposes a school, church, day care or other use that involves a concentration of
 people at certain times within one mile of an agricultural operation or land under Williamson
 Act contract and as a result of the project, land use conflicts between the agricultural operation
 or Williamson Act contract land and the Proposed Project would likely occur and could result
 in conversion of agricultural resources to a non-agricultural use.
- The project would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of off-site agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act Contract.

Analysis

A proposed project near an active agricultural use has the potential to cause significant indirect impacts to agricultural resources because of the potential incompatibility between the proposed use and existing agricultural activities. Adverse impacts caused by incompatible development near agricultural uses include farm practice complaints; pesticide use limitations; liability concerns; economic instability caused by urbanization and changing land values; trespassing, theft, and

The term "active agricultural operation" refers to the routine and ongoing commercial operations associated with a farm, grove, dairy, or other agricultural business, and includes the following: (a) the cultivation and tillage of soil; crop rotation; fallowing for agricultural purposes; the production, cultivation, growing, replanting and harvesting of any agricultural commodity including viticulture, vermiculture, apiculture, or horticulture; (b) the raising of livestock, fur bearing animals, fish or poultry, and dairying; (c) any practices performed by a farmer on a farm as incident to or in conjunction with those farming or grove operations, including the preparation for market, delivery to storage or to market, or delivery to carriers for transportation to market; and (d) ordinary pasture maintenance and renovation and dry land farming operations consistent with rangeland management. All such activities must be consistent with the economics of commercial agricultural operations and other similar agricultural activities (County of San Diego 2011a).

vandalism; damage to equipment, crops, and livestock; crop and irrigation spraying limitations due to urban use encroachment; introduction of urban use pollutants entering farm water sources; competition for water; development affecting recharge of groundwater; soil erosion and stormwater 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.

The closest active agricultural operations to the Project site are located approximately 25 miles to the east in Dixieland, California. The agricultural operations in Dixieland are composed primarily of irrigated row crops and dairy farms. There are no active agricultural operations within 0.25 miles of the Project site. There are also no areas under a Williamson Act Contract within 0.25 miles of the Project site. Therefore, the Proposed Project would not involve changes to the existing environment that, due to their location or nature, could indirectly result in the conversion of off-site agricultural resources to non-agricultural use, or could adversely impact the viability of agriculture on land under a Williamson Act Contract.

The Proposed Project does not propose a school, church, daycare, or other use that involves a heavy concentration of people at certain times of the day within 1 mile of an agricultural operation or land under a Williamson Act Contract.

The Project site is composed of approximately 1,356 acres within the ZOI of 11,254 acres (see Figure 3.1.1-2). As previously discussed, approximately 11,200.2 acres within the ZOI is composed of parcels greater than 2 acres and contains elements of rural lifestyle (see Appendix O). More than 50% of the land within the ZOI is compatible with agriculture; therefore, the surrounding land use rating is considered "high." However, there are no agricultural preserves or Williamson Act lands in the ZOI, and no active agricultural production or operation exists within the ZOI. Thus, the Proposed Project would not obstruct, interrupt, or detract from potential agricultural operations within the ZOI or be detrimental to surrounding properties. Accordingly, the Proposed Project would not result in any additional pressure to convert nearby agricultural lands, due to the closest active agricultural lands being 25 miles east.

The Proposed Project would not involve other changes to the existing environment that, due to their location or nature, could result in the conversion of off-site agricultural resources to a non-agricultural use, or could adversely impact the viability of agriculture on land under contract. The Proposed Project would not require the extension of water or sewer infrastructure that could potentially induce urban growth in the ZOI.

In conclusion, due to the lack of surrounding off-site agricultural resources and operations, impacts to off-site agricultural resources is unlikely. The Project site is located approximately 25 miles from the closest active agricultural operation. Off-site agricultural impacts would be **less than significant**.

Switchyard

The switchyard would be built on land designated under the state FMMP as "Other Land" (California Department of Conservation 2010). The switchyard would not obstruct, interrupt, or detract from existing agricultural operations within the ZOI; would not be located within 0.25 miles of an active agricultural operation or land under a Williamson Contract; and would not be detrimental to surrounding agricultural properties. Therefore, impacts as a result of the switchyard to off-site agricultural impacts would be **less than significant.**

Conflicts with Agricultural Zoning and Williamson Act Contracts

Guidelines for the Determination of Significance

For purposes of this EIR, the County's Guidelines apply to the direct, indirect, and cumulative impact analyses (County of San Diego 2015), which states that a significant indirect impact to agricultural resources would result if a project conflicts with Agricultural Zoning or Williamson Act Contract.

Analysis

The 2011 County General Plan is applicable to the Proposed Project. The relevant policies related to agricultural use at the Project site as contained in the Conservation and Open Space Element of the General Plan (County of San Diego 2011b) are discussed in Table 3.1.1-4, Agricultural Goals and Policies.

Due to the Proposed Project's location within the Jacumba portion of the Mountain Empire Subregional Plan area, the Proposed Project is also subject to the Mountain Empire Subregional Plan. Proposed Project consistency with the San Diego County General Plan and the Mountain Empire Subregional Plan is provided in Table 3.1.1-4. As evaluated in Table 3.1.1-4, the Proposed Project would not conflict with applicable goals or policies related to agriculture. The Proposed Project would not conflict with Agricultural Zoning or Williamson Act Contracts, and impacts would be **less than significant**.

Switchyard

The switchyard would be built on land that does not have any Williamson Act Contract lands and would not conflict with agricultural zoning. Therefore, impacts would be **less than significant**.

3.1.1.4 Cumulative Impact Analysis

Per CEQA Guidelines Section 15130(b)(1), a list of projects has been compiled based on past, present, and probable future projects that could cumulatively contribute to the Proposed Project's impacts. The geographic extent for the analysis of cumulative impacts associated with agricultural resources includes the vicinity of all reasonably foreseeable cumulative projects and extends throughout southeastern San Diego County. The cumulative projects mapped by the FMMP as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are shown in Figure 3.1.1-5, Cumulative Projects FMMP, and cumulative projects mapped with soils that are designated by the County as Prime Farmland Soil Candidates and Farmland of Statewide Importance Soil Criteria are shown in Figure 3.1.1-6, Cumulative Project Soils.

In addition to the Project site, two of the cumulative projects are located on FMMP-designated lands: Campo Wind Project with Boulder Brush Facilities and Cameron Solar. The Campo Wind facilities proposed on the Campo Reservation are outside of the state's and County's authority and are not subject to the County's LARA Model. The Boulder Brush Facilities portion of that project would be located on private land that is not considered to be an important agricultural resource according to the LARA Model. In addition, 16 of the cumulative projects are partially located on soils that are designated by the FMMP as Prime Farmland or Farmland of Statewide Importance, which would affect 56.05 acres of agricultural land cumulatively (Appendix O). The Tule Wind Project was estimated to have 1 acre of direct impacts to agricultural lands. These impacts were determined to have a less-than-significant impact due to the low soil rating and the relatively small impact of less than 1 acre within 12,239 acres of public lands, respectively.

Six cumulative projects were determined to potentially have direct impacts because the project locations have known agricultural resources on site, contain County-designated soils, and/or are within a climate zone rated "moderate." Five of the six projects were not required to prepare an Agricultural Resources Technical Report or a LARA Model because impacts to agricultural resources were determined to be insignificant not requiring further evaluation. Therefore, none of the listed cumulative projects would directly or indirectly impact important agricultural resources as a result of the conversion of agricultural land. Therefore, no direct or indirect impact is anticipated to occur as a result of these projects.

Two of the cumulative projects would occur on land designated as an agricultural preserve: Boulevard Solar and Tule Wind. The small agricultural operations in the area have coexisted with residential land uses surrounding the operations. These sites are most likely already limited in their use of pesticides and irrigation spraying due to the proximity of neighboring residences. The Tule Wind project is located near the McCain Valley Agricultural Preserve. In 2010, there was livestock grazing within the McCain Valley area. However, according to the Bureau of Land Management Resource Management Plan (BLM 2008), wells that have supported historic grazing cattle have gone dry and have not been re-drilled. In addition, grazing policies have changed and public lands

are not available for livestock grazing in accordance with the San Diego County Resource Management Plan (BLM 2008). The Bureau of Land Management Resource Management grazing permit for the McCain Valley area expired on September 18, 2010. At this time, no livestock grazing is permitted. As such, the Tule Wind project would not interfere with active agricultural operations or convert farmland to non-agricultural use.

For the reasons described above, a cumulatively significant conversion of agricultural land to a nonagricultural use would not occur. Surrounding existing agricultural operations are small. Conversion of agricultural land to a nonagricultural use would be less than significant due to lack of suitable agricultural land and small impact of wind turbines to agricultural resources. Cumulative projects would occur in proximity to existing agricultural operations; however, it is not anticipated that cumulative projects would have adverse indirect impacts to the viability of surrounding agricultural land. **Impacts to agricultural land would not be cumulatively considerable**, and no mitigation measures are required.

3.1.1.5 Significance of Impacts Prior to Mitigation

The Proposed Project would result in the conversion of agricultural resources that meet the County candidate soil quality criteria for Prime Farmland or Farmland of Local/Statewide Importance, as defined in the County's Guidelines for Determination of Significance. A majority of the Project site is mapped by FMMP as "Other Land," with additional Prime Farmland, Farmland of Statewide/Local Importance, and Unique Farmland, and the LARA Model determined the soil agricultural viability rating to be moderate. However, the Project site does not have important agricultural resources, as defined by the LARA Model. As a result, the Proposed Project would not substantially impair the ongoing viability of the site for agricultural use, and impacts would be **less than significant**.

The Proposed Project would lead to a non-agricultural land use. However, there are no active agricultural operations within 0.25 miles of the Project site. Therefore, the Proposed Project would not conflict with applicable policies related to agriculture. **No significant impacts** related toconformance with agricultural policies would occur.

The Project site is not considered to be an important agricultural resource according to the LARA Model. Therefore, direct impacts to on-site agricultural resources would be **less than significant.**

3.1.1.6 Mitigation Measures and Design Considerations

No mitigation measures related to direct, indirect, or cumulative impacts to agricultural resources are necessary.

3.1.1.7 Project Effects After Mitigation

Direct, indirect and cumulative impacts to agricultural resources would be **less than significant**. No mitigation measures related to agricultural resources are necessary.

Table 3.1.1-1 Soil Quality

Soil Type	Acres on Site	Acres Unavailable for Agricultural Use	Acres Available for Agricultural Use	Proportion of Project Site	Candidate for Prime Farmland or Statewide Importance	Score
AcG	131.58	127.863	3.75	0.0028	No	0
CeC	91.04	86.25	4.79	0.0035	No	0
InA	42.10	7.38	34.72	0.0256	Yes(PF)	0.0256
InB	119.78	58.21	61.57	0.0454	Yes (PF)	0.0454
IoA	305	152.82	152.26	0.1123	Yes (FSS)	0.1123
LcE2	4.82	4.13	0.69	0.0005	No	0
RaC	6.05	6.05	0	0	Yes (FSS)	0
RaD2	24	14.98	8.73	0.0064	No	0
RkA	272	4.61	267.44	0.1973	Yes (PF)	0.1973
RsC	72.62	43.64	28.97	0.0214	Yes (FSS)	0.0214
SrD	61.70	58.49	3.21	0.0024	No	0
SvE	225.06	191.51	33.54	0.0247	No	0
Totals*	1355.56	755.90	599.67	0.4424	N/A	0.402

Source: Appendix O.

AcG, Acid igneous rock land; CeC, Carrizo very gravelly sand 0%–9% slopes; InA, Indio silt loam, 0%–2% slopes; InB, Indio silt loam 2%–5% slopes; IoA, Indio silt loam, saline, 0%–2% slopes; LcE2, La Posta rocky loamy coarse sand, 5%–30% slopes, eroded; RaC, Ramona Sandy Loam, 5%–9% slopes; RaD2, Ramona sandy loam, 9%–15% slopes; RkA, Reiff fine sandy loam, 0%–2% slopes; RsC, Rositas loamy coarse sand, 2%–9% slopes; SrD, Sloping gullied land; SvE, Stony land

N/A = not applicable; PF = Prime Farmland; FSS = Farmland of Statewide Significance

Table 3.1.1-2 LARA Model Factor Ratings

	High	Moderate	Low	
Required Factors				
Climate		Χ		
Water		Χ		
Soil Quality		Х		
Complementary Factors				
Surrounding Land Uses	X			
Land Use Consistency			X	
Slope	X			

Source: Appendix O.

^{*} Totals may not sum precisely due to rounding. The Project site itself is 1,356 acres. The additional 10 acres shown here includes the easement for Old Highway 80, which traverses the Project site.

Table 3.1.1-3
Interpretation of LARA Model Results

	LARA Model R		
Possible Scenarios	Required Factors	Complementary Factors	LARA Model Interpretation
Scenario 1	All three factors rated high	At least one factor rated high or moderate	The site is an important agricultural resource
Scenario 2	Two factors rated high, one factor rated moderate	At least two factors rated high or moderate	
Scenario 3	One factor rated high, two factors rated moderate	At least two factors rated high	
Scenario 4	All factors rated moderate	All factors rated high	
Scenario 5	At least one factor rated low importance	N/A	The site is <i>not</i> an important agricultural resource
Scenario 6	All other model results]

Source: County of San Diego 2015 **Note**: N/A = not applicable

Table 3.1.1-4
Agricultural Goals and Policies

Goal or Policy	Proposed Project Consistency
General Plan – Conservation and C	Open Space Element
GOAL COS-6 Sustainable Agricultural Industry. A viable and long-term agricultural industry and sustainable agricultural land uses in the County of San Diego that serve as a beneficial resource and contributor to the County's rural character and open space network.	The Project site is largely undeveloped and does not contain any existing major agricultural uses or irrigated croplands. Agricultural operations were historically located on site, but based on current site visits and environmental field surveys conducted for the Proposed Project, there is no evidence of current agriculture occurring on the Project site. As seen in Figure 3.1.1-2, Zone of Influence Important Farmlands, portions of the Project site are designated under the state Farmland Mapping and Monitoring Program as Prime Farmland, Farmland of State/Local Importance, and Unique Farmland, but these areas make up approximately 29% of the Project site and 6% of the Zone of Influence (ZOI).
COS-6.2 Protection of Agricultural Operations. Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:	The closest active agricultural operations are located approximately 25 miles east of the Project site in Dixieland, California. The agricultural operations in the surrounding area are composed primarily of
 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 	irrigated row crops and dairy farms. However, land use conflicts between these agricultural operations and the Proposed Project would not be likely. The Proposed Project would not impact these operations because the Project site is 25 miles west of active agricultural operations.

Table 3.1.1-4 Agricultural Goals and Policies

Cool or Policy	Drawaged Project Consistency
Goal or Policy (e.g., landscape screening) between intensive uses and	Proposed Project Consistency
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 energitions through the incorporation of	
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 consolidations of development during the subdivision	
process.	
Discourage development that is potentially incompatible with	The Proposed Project does not propose a school,
intensive agricultural uses includes schools and civic buildings	church, daycare, or other use that would involve a
where the public gather, daycare facilities under private institutional	heavy concentration of people at certain times of the
use, private institutional uses (e.g., private hospitals or rest homes),	day, nor does the Proposed Project propose residential uses.
residential densities higher than two dwelling units per acre, and office and retail commercial.	Todachiai asss.
omoo aha rotan oommorotan	
COS-6.3 Compatibility with Recreation and Open Space.	The Proposed Project would not propose
Encourage siting recreational and open space uses and multi-use	development adjacent to agricultural land uses.
trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land	
uses. Recreational and open space uses can serve as an effective	
buffer between agriculture and development that is potential	
incompatible with agriculture uses.	
General Plan – Land Us	
LU-5.3 Rural Land Preservation. Ensure the preservation of	The Project site does not include any existing open space
existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands,	easements. The Project site includes a small area (37.88 acres) designated Rural Lands as well as jurisdictional
watersheds, and groundwater recharge areas) when permitting	aquatic resources as defined by Section 404 of the Clean
development under the Rural and Semi-Rural Land Use	Water Act. However, the Project site does not have
Designations.	important agricultural resources, as defined by the LARA
	Model. And the Project only proposes an interim use of the site; the solar facility (except for switchyard) would be
	decommissioned after 35 years. As a result, the Project
	would not substantially impair the ongoing viability of the
	site for agricultural use, and impacts would be less than
	significant. Mitigation would ensure impacts to wetlands and jurisdictional resources are reduced to less than
	significant levels.
	During operation of the Project, water demand would not
	exceed the threshold of 50% reduction in groundwater
	storage, nor would the Project result in adverse impacts to
	groundwater dependent habitat or well interference habitat near groundwater wells. Implementation of PDF-HYD-2
	i near groundwater wells. Implementation of PDF-PTD-2

Table 3.1.1-4
Agricultural Goals and Policies

Goal or Policy	Proposed Project Consistency
	(GMMP) would ensure the groundwater wells used will be monitored throughout the implementation of the Project. Therefore, impacts to groundwater as a result of the proposed Project would be less than significant, and no mitigation measures would be required. In addition, as discussed in Section 2.7, Hydrology and Water Quality, the Project site would consist of primarily permeable surfaces to allow for groundwater recharge similar to that under current conditions.
	The Project would take into consideration the existing natural features throughout the site to avoid sensitive environmental resources to the extent practicable.
	In addition, the agricultural operations in the surrounding area are composed primarily of irrigated row crops and dairy farms, but no such operations occur within 0.25 miles of the Project site. Additionally, since no areas under a Williamson Act Contract are within 0.25 miles of the Project site, the Proposed Project would not involve changes to the existing environment that, due to their location or nature, could indirectly result in the conversion of off-site agricultural resources to non-agricultural use, or could adversely impact the viability of agriculture on land under a Williamson Act Contract.
	The Proposed Project would not introduce sensitive receptors that could object to ongoing agricultural operations. Additionally, the Proposed Project would not obstruct, interrupt, or detract from potential agricultural operations within the ZOI, or be detrimental to surrounding properties. Accordingly, the Proposed Project would not result in any additional pressure to convert surrounding agricultural lands.
	Lastly, there are no agricultural preserves and no active agricultural production exists within 0.25 miles of the Project site.
GOAL LU-7 Agricultural Conservation. A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.	The Project does not propose to change any zoning or land use designations on the site, and as such, will not impact any nearby agricultural operations. The Project site does not have important agricultural resources, as defined by the LARA Model. As a result, the Proposed Project would not substantially impair the ongoing viability of the site for agricultural use, and impacts would be less than significant.
LU-7.1 Agricultural Land Development. Protect agricultural lands with lower density land use designations that support continued	The Project site is largely an undeveloped ranch land and does not contain any current major agricultural

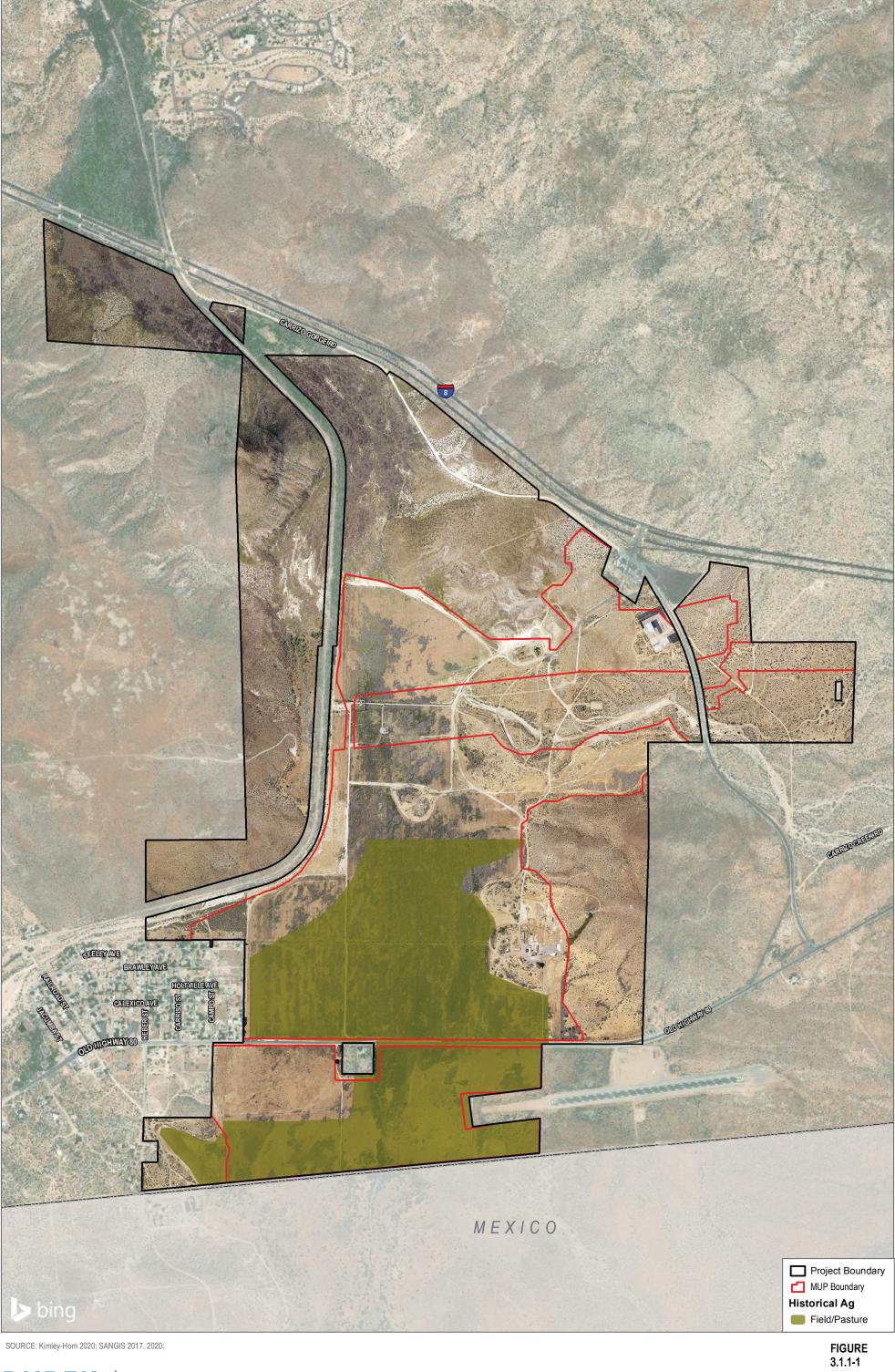
Table 3.1.1-4
Agricultural Goals and Policies

Goal or Policy	Proposed Project Consistency
agricultural operations.	uses or irrigated croplands. Based on current site visits and environmental field surveys conducted for the Proposed Project, there is no evidence of current agricultural activity occurring on the Project site. As seen in Figure 3.1.1-2, Zone of Influence Important Farmlands, portions of the Project site are designated under the state Farmland Mapping and Monitoring Program as Prime Farmland, Farmland of Local/State Importance, or Unique Farmland.
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.	There are no active agricultural operations in the Proposed Project's ZOI. Consequently, the Proposed Project would not obstruct, interrupt, or detract from existing agricultural operations within the ZOI, or be detrimental to surrounding properties. Since there are no active agricultural lands within 0.25 miles of the Project Site, this would not result in any additional pressure to convert surrounding agricultural lands.
	The Proposed Project does not propose residential uses; therefore, the Proposed Project would not conflict with surrounding agricultural uses as it pertains to introduction of residential uses to the area.
Mountain Empire Subreg	gional Plan
Agricultural Goal. Encourage the expansion and continuance of agricultural uses in the subregion.	The site also has portions that have been used as historical field or pasture agricultural lands. However, the Proposed Project would not conflict with a Williamson Act Contract or agricultural preserve. The Proposed Project would not change the rural characteristic of the area, as there are no active agricultural operations in the Proposed Project's Zone of Influence (ZOI). Consequently, the Proposed Project would not obstruct, interrupt, or detract from existing agricultural operations within the ZOI, or be detrimental to surrounding properties. Since there are no active agricultural lands within 0.25 miles of the Project site, this would not result in any additional pressure to convert surrounding agricultural lands.
	In addition, the solar facility (except for switchyard) would be decommissioned after 35 years. As a result, the Proposed Project would not substantially impair the ongoing viability of the site for agricultural use, and impacts would be less than significant. Further, no residential or dense urban development is proposed that may conflict with existing agricultural uses. The surrounding area is composed

Table 3.1.1-4
Agricultural Goals and Policies

Goal or Policy	Proposed Project Consistency
	predominantly of rural land with a small portion of commercial land to the northeast and residential land associated with the community of Jacumba Hot Springs to the west. The Proposed Project would not involve changes to the existing environment that, due to their location or nature, could indirectly result in the conversion of off-site agricultural resources to nonagricultural use, or could adversely impact the viability of agriculture on surrounding land.

Source: Appendix O



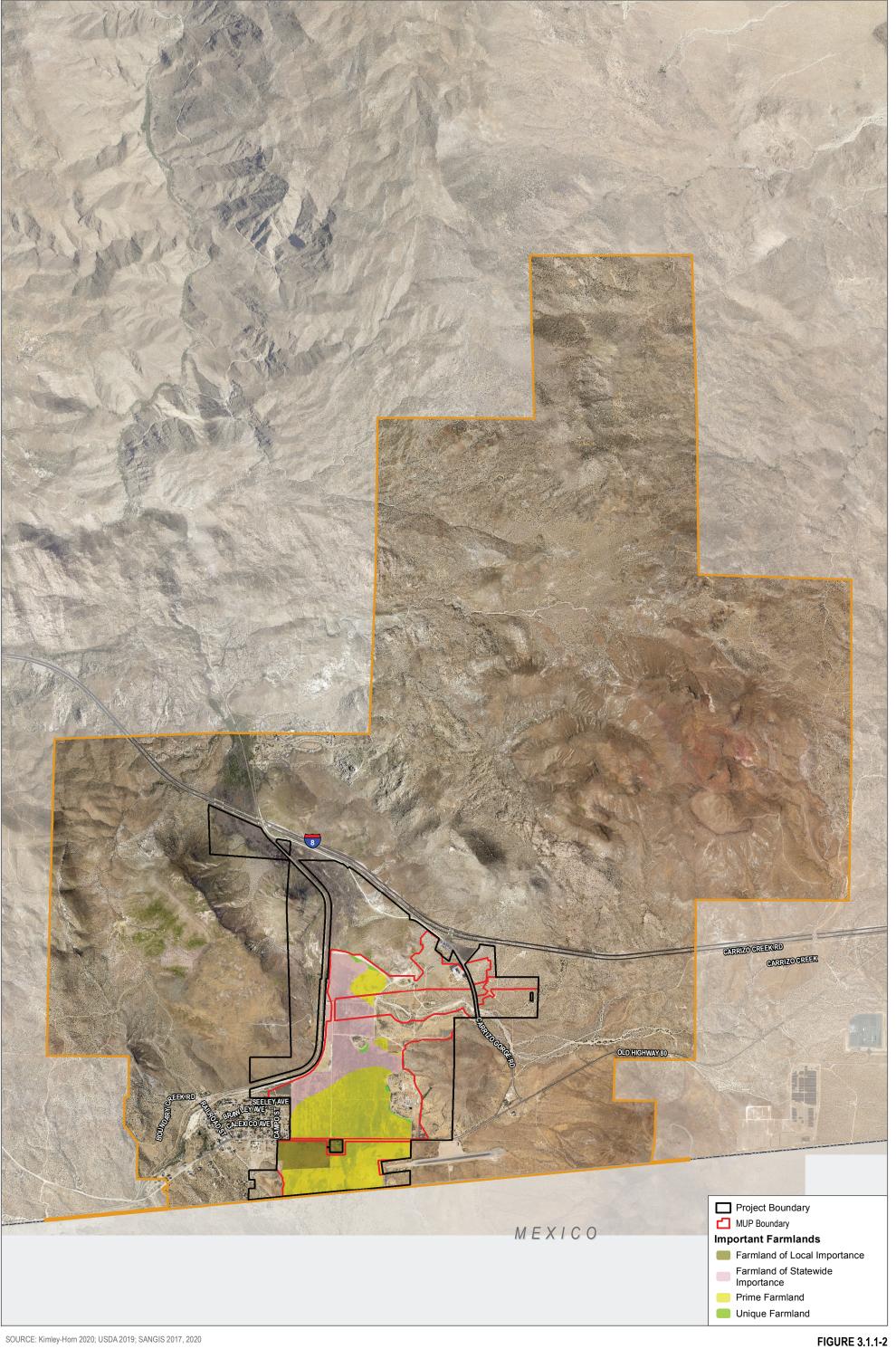
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Historical Agricultural Land

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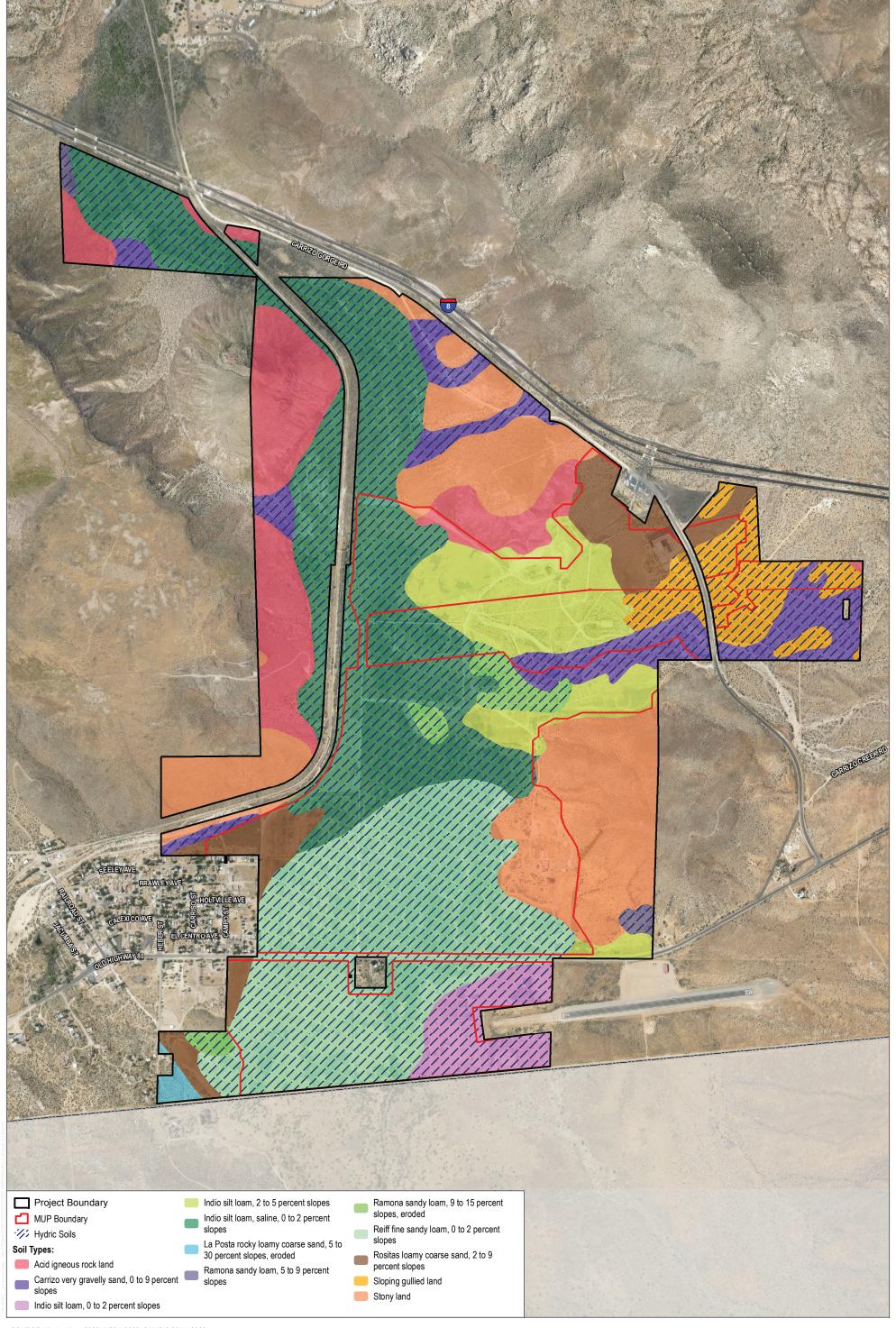
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Agricultural Resources

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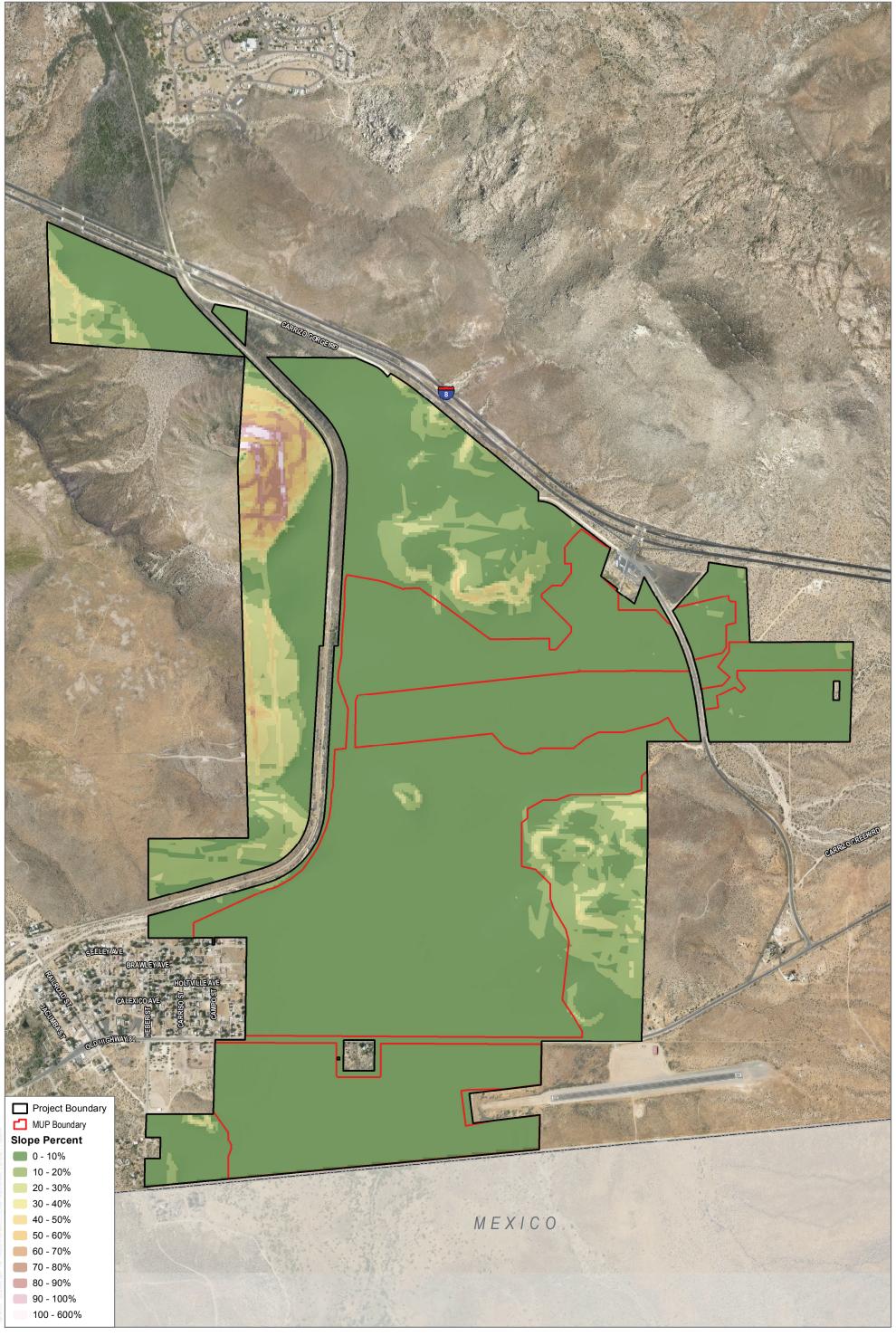
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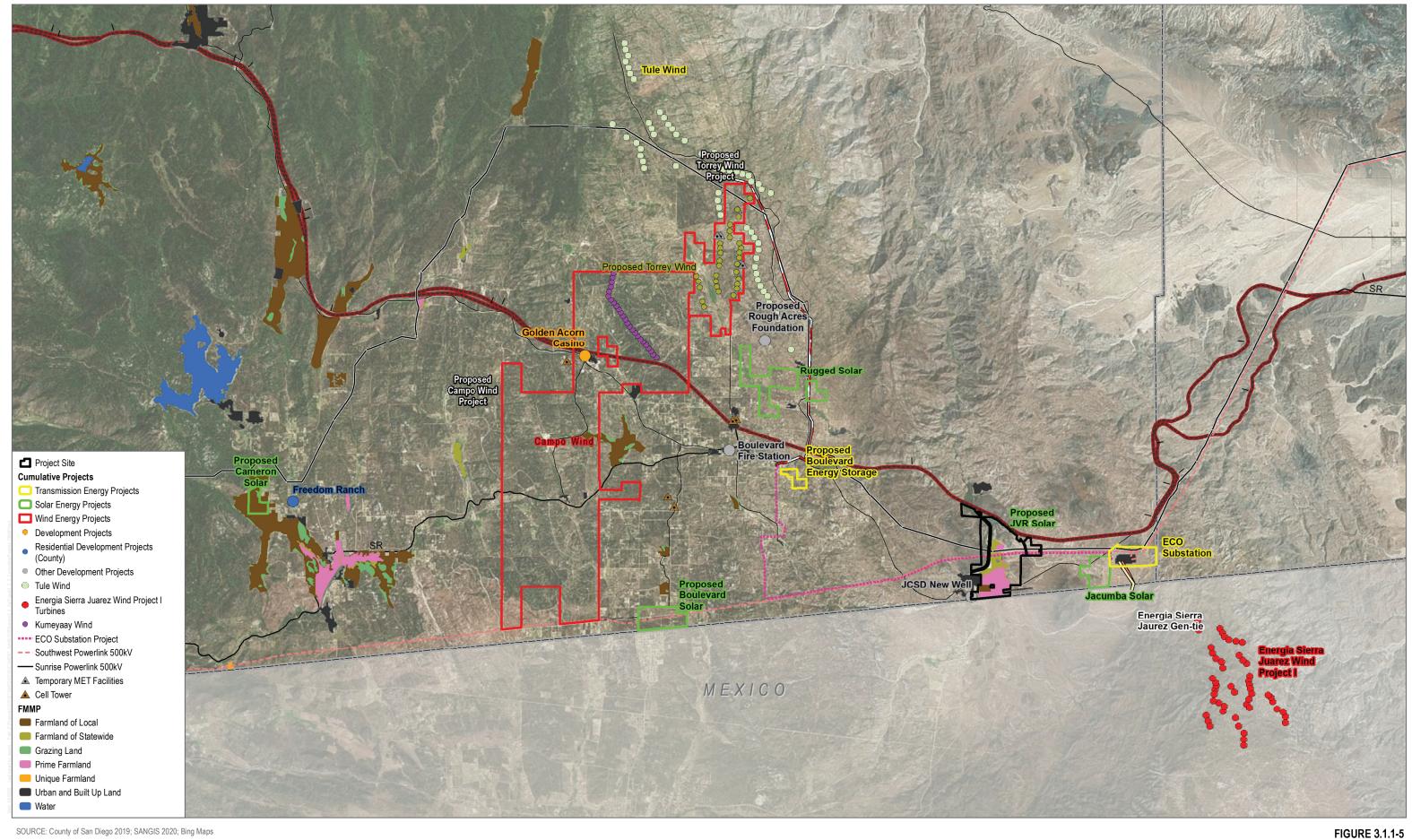
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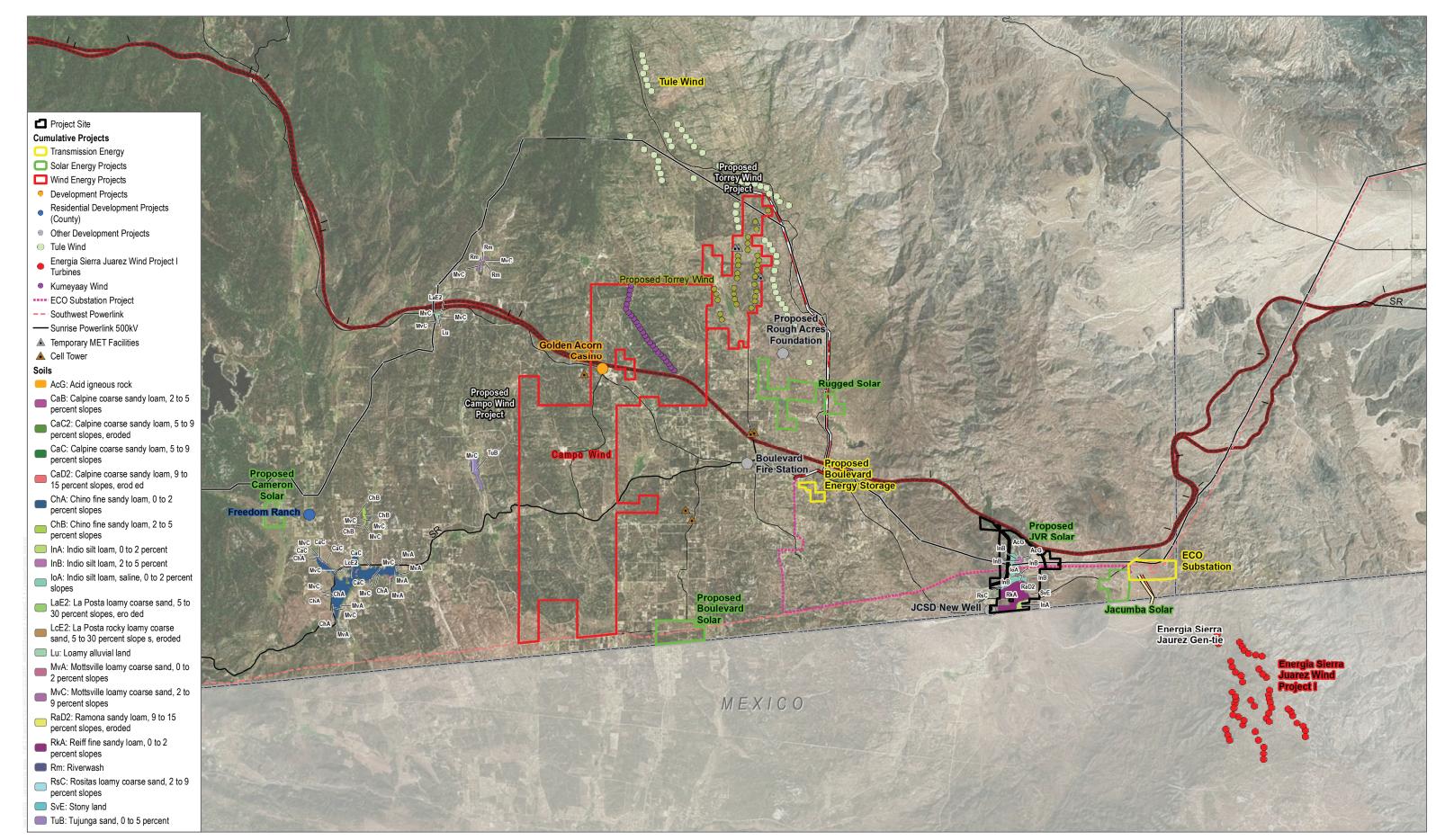
SOURCE: County of San Diego 2019; SANGIS 2020; Bing Maps

Cumulative Projects FMMP

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SOURCE: County of San Diego 2019; SANGIS 2020; Bing Maps

FIGURE 3.1.1-6

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