

2.2 Agriculture and Forestry Resources

This section describes existing conditions for agricultural resources (including Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance [“Important Farmland”]); zoning for agricultural use, Williamson Act contracts, and other agricultural uses in the county; and evaluates the potential effects that implementation of the CAP Update may have on these resources. This section also describes existing conditions for forest land in the county and evaluates potential effects that implementation of the CAP Update may have on these forestry resources. Because this analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the agriculture resources setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. In 2009, Appendix G of the State CEQA Guidelines was amended to include additional significance criteria to evaluate a project’s potential impact on forestry resources. Because the amended significance criteria addressing forestry resources were not yet adopted in 2008, when the Notice of Preparation (NOP) for the 2011 GPU PEIR was released, an evaluation of potential impacts on forestry resources was not included in the 2011 GPU PEIR.

Table 2.2-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. The impact evaluations presented in the 2011 GPU PEIR related to the direct and indirect conversion of agricultural resources have been consolidated in this draft SEIR because the physical changes associated with implementation of the CAP Update would result in similar impacts in these issue areas. As indicated in Table 2.2-1, implementation of the CAP Update would result in new or more severe significant impacts on agriculture and forestry resources.

During the NOP scoping process, the County received several comments regarding agriculture and forestry resources. The comments generally expressed support for reducing GHG emissions through carbon sequestration on agricultural lands. Other comments expressed that the County should consider using agricultural land as local GHG mitigation banks; estimating net carbon sequestration in agricultural lands; engaging experts on carbon farming to advance agricultural strategies in the region; making CAP measures applicable to farming voluntary; working with the County Farm Bureau and agriculture community to develop carbon farming as a viable strategy for the CAP; and encouraging carbon sequestration with regenerative soil practices and climate friendly agriculture. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

Table 2.2-1 Summary of Agriculture and Forestry Resources–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Direct or Indirect Conversion of Agricultural Resources ¹	General Plan Only: Significant and Unavoidable	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
2	Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands	General Plan Only: Less than Significant (agriculture) ²	CAP Update Only: Yes (agriculture) No (forest)	CAP Update Only: Yes (agriculture) No (forest)
		General Plan Cumulative Contribution: Less than Significant (agriculture) ²	CAP Update Cumulative Contribution: Yes (agriculture) No (forest)	CAP Update Cumulative Contribution: Yes (agriculture) No (forest)
3	Direct and Indirect Conversion or Loss of Forest Land	Not evaluated ²	CAP Update Only: Yes	CAP Update Only: Yes
			CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes

Notes: CAP = Climate Action Plan; GPU = General Plan Update; PEIR = Program Environmental Impact Report; SEIR = Supplemental Environmental Impact Report.

¹ The impact evaluations presented in the 2011 GPU PEIR related to the direct and indirect conversion of agricultural resources have been consolidated in this draft SEIR because the physical changes associated with implementation of the CAP Update would result in similar impacts in these issue areas.

² Evaluation of forestry resources was not required at the time the Notice of Preparation for the 2011 General Plan Update Program Environmental Impact Report was released.

Source: Compiled by Ascent Environmental in 2023.

2.2.1 Existing Conditions

2.2.1.1 Agriculture Resources

Pages 2.2-1 through 2.2-8 in Section 2.2, “Agricultural Resources,” of the 2011 GPU PEIR include a discussion of existing conditions related to agriculture resources in the unincorporated county. The following discussion includes a summary of changes to the existing conditions related to agricultural resources in the unincorporated county since certification of the 2011 GPU PEIR.

The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts on California’s agricultural resources. Under the FMMP, agricultural land is rated according to soil quality and irrigation status and the best quality land is classified as Prime Farmland. As shown in Table 2.2-1 of the 2011 GPU PEIR, 2006 data from the FMMP

identified 314,032 acres of land within San Diego County as agricultural land, of which 207,352 acres were categorized as Important Farmland and 106,680 acres were categorized as grazing land (County of San Diego 2011). Based on more recent data from 2018, the DOC FMMP identified 278,541 acres of land within San Diego County as agricultural land, of which 181,635 acres were categorized as Important Farmland and 96,606 acres were categorized as grazing land (DOC 2022) (see Figure 2.2-1). Therefore, there was a decrease of 35,491 acres in agricultural land, as identified by the FMMP, within the unincorporated county between 2006 and 2018.

As described on page 2.2-2 of the 2011 GPU PEIR, the County used 2008 data from the County's Department of Planning and Land Use and Department of Agricultural Weights, Measures, and Commodities; the California Department of Water Resources; and the US Department of Agriculture to better estimate the acreage of agricultural resources within the county. Using these data sources, the County identified approximately 407,600 acres of farmland within its boundaries, which are categorized into one of two commodity categories: grazing lands or croplands (County of San Diego 2011). These data sources are no longer maintained by the County. The San Diego Geographic Information Source (SanGIS), a Joint Powers Authority of the City of San Diego and the County of San Diego, maintains geographic information system data for the San Diego region. SanGIS identified 404,758 acres of agricultural preserves within the unincorporated county, as shown on Figure 2.2-2. An agricultural preserve is an area devoted to either agricultural use, open space use, recreational use, or any combination of such uses, and compatible uses which are designated by the County.

The Williamson Act Program is the California regulation enabling 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. As described on page 2.2-8 of the 2011 GPU PEIR, approximately 80,504 acres of private, federal, and state lands in the unincorporated county were enrolled in a Williamson Act contract, with 40 parcels in the process of non-renewal (i.e., termination of a Williamson Act contract) (County of San Diego 2011). Based on more recent data from 2022, 84,821 acres of land in the unincorporated county is enrolled in a Williamson Act contract, with 950 acres identified in the non-renewal process (see Figure 2.2-3). Therefore, there has been an increase in the acreage of lands enrolled in a Williamson Act contract in the unincorporated county since certification of the 2011 GPU PEIR.

As discussed on page 2.2-7 of the 2011 GPU PEIR, the General Plan identifies two agricultural land use designations: Limited Agricultural Use (A70) and General Agricultural Use (A72). Lands designated for Limited Agricultural use are intended primarily for agricultural crop production. The land use regulations for Limited Agricultural uses are intended for the protection of moderate to high quality agricultural land. Lands designated for General Agricultural use are intended for the raising of crops and animals, as well as the processing of products produced or raised on the premises and certain commercial activities associated with crop and animal raising. The General Agricultural land use designation is applied to areas distant from urban centers where dust, odor, and noise of agricultural operations would not interfere with urban uses, and where urban development would not encroach on agricultural uses. Approximately 31 percent of land

within the unincorporated county is zoned Limited Agricultural Use (A70) and General Agricultural Use (A72) (County of San Diego 2011). The percent of land that is designated for agricultural land use in the unincorporated county remains at 31 percent (716,890 acres) and has not changed since certification of the 2011 GPU PEIR (SanGIS 2023).

2.2.1.2 Forestry Resources

As stated above, the NOP for the 2011 GPU PEIR was released on April 28, 2008. Appendix G of the State CEQA Guidelines was amended in 2009 to include additional significance criteria to evaluate a project's potential impact on forestry resources. Because 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. Therefore, this section includes a discussion of existing conditions related to forestry and timberland resources within the unincorporated county.

The US Forest Service (USFS) defines a forested area as "forest land" if it is at least 1 acre in size and at least 10 percent occupied by forest trees of any size or formerly 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 also 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" (County of 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 US public domain;
- national forest lands acquired through purchase, exchange, donation, or other means;
- national grasslands; and
- other lands, waters, or interests administered by USFS or designated for administration through 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 and 51113(h) of the California Public Resources Code define "Timberland Production Zone" as land used for growing and harvesting timber and compatible uses.

The county does not include lands zoned specifically for forest land, timberland, or timberland production. However, lands that are managed by USFS and included within

the Cleveland National Forest 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 Cleveland National Forest lands are under the jurisdiction of USFS, the private lands adjacent to and surrounding the Cleveland National Forest lands are under the County’s jurisdiction.

2.2.2 Regulatory Framework

Section 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 incorporated herein by reference. Specific regulations discussed in the 2011 GPU PEIR and applicable to the CAP Update include the following:

2.2.2.1 Federal

- Farmland Protection Policy Act

2.2.2.2 State

- California Civil Code Section 3482.5 (Right to Farm Act)
- California Land Conservation Act of 1965 (Williamson Act)
- California Farmland Conservancy Program
- Open Space Subvention Act
- FMMP
- Farm and Ranch Lands Protection Program

2.2.2.3 Local

- County of San Diego Board of Supervisors (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
- 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 (except for the expansion of the Purchase of Agricultural Conservation Easement [PACE] Program described below and the adoption of ordinances and programs that are not applicable to the CAP Update) and continues to apply to the unincorporated county as addressed in this draft SEIR.

Purchase of Agricultural Conservation Easement Program

The PACE Program is an agricultural conservation program that promotes the long-term preservation of agriculture in the county. Under the PACE Program, agricultural property owners are compensated for placing a perpetual easement on their property that limits future uses to agriculture. As a result, the agricultural land is preserved, and the property owner receives compensation making the land's continued use for agriculture more viable. The County's BOS adopted a resolution expanding the properties eligible to participate in the PACE Program on March 3, 2021. Properties must meet the following eligibility criteria to apply for the expanded program: (1) the property has had active agriculture for at least 2 years immediately prior to application; and (2) the property must be zoned A70 (Limited Agriculture), A72 (General Agriculture), RR (Rural Residential), S90 (Holding Area), or S92 (General Rural). The PACE Program also includes a mitigation bank and credit component, which allows PACE Program lands to be utilized as off-site mitigation for agricultural impacts resulting from private development projects.

2011 San Diego County General Plan

The General Plan policies related to agricultural resources and applicable to the CAP Update include the following:

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.

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 LU-16.1: Location of Waste Management Facilities. Site new solid waste management facilities identified in the San Diego County Integrated Waste Management Plan, in a manner that minimizes environmental impacts and prevents groundwater degradation, and in accordance with applicable local land use policies.

Policy LU-16.3: New Waste Management Facilities. Encourage the establishment of additional recycling and resource recovery facilities in areas with Industrial land use designations or other appropriate areas based on the type of recycling.

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

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

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

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

2011 San Diego County GPU PEIR

The following mitigation measures relevant to agricultural resources were adopted as part of the 2011 GPU PEIR and are applicable to the CAP Update:

Adopted Mitigation Measure 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.

Adopted Mitigation Measure 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).

Adopted Mitigation Measure 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.

Adopted Mitigation Measure Agr-1.4: Develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land.

Adopted Mitigation Measure 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).

Adopted Mitigation Measure 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 Analysis of Effects and Significance Determinations

2.2.3.1 Significance Criteria

Based on Appendix G of the State CEQA Guidelines, the proposed project would result in a significant impact on agriculture and forestry resources if it would:

- convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- conflict with existing zoning for agricultural use, or a Williamson Act contract;
- conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));
- result in the loss of forest land or conversion of forest land to non-forest use;
- involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

2.2.3.2 Approach to Analysis

Impacts related to agriculture and forestry resources were analyzed qualitatively based on a review of CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant adopted General Plan policies and 2011 GPU PEIR mitigation measures have been applied to the proposed project as needed to avoid or minimize project impacts.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether approval and implementation of the CAP Update would result in new or more severe impacts than what were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward the established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impact of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county, the study area for the CAP Update is the unincorporated area of the county within the County's jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations).

The analysis in this draft SEIR is programmatic. Implementation of all CAP Update measures and actions were considered during preparation of this draft SEIR, to the degree specific information about their implementation is known. This draft SEIR does not speculate about the potential site-specific physical impacts (i.e., project-level analysis) that could occur if and when specific improvements are proposed in the future at locations still to be determined. Rather, this SEIR considers the types of impacts that could occur with implementation of future that support implementation of the proposed GHG reduction measures and actions. Future discretionary projects would be evaluated by the County to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts are reduced to below a significant impact.

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions, proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update actions and measures that would have

the potential to affect agricultural or forestry resources are provided below. CAP Update actions and measures that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to agriculture and forestry resources.

Solid Waste Measures and Actions. This category includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture and forestry resources include those that would result in the development of new or expanded recycling and composting facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Water and Wastewater Measures and Actions. This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture and forestry resources include those that would result in the construction of new recycled water and stormwater capture and reuse infrastructure (Actions W-1.1, W-2.2, W-2.3, and W-2.4).

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. These measures and actions are not expected to result in new or more severe impacts related to agriculture and forestry resources. Rather, actions that support Measures A-1 and A-3 would result in the acquisition of conservation lands. Actions that support Measure A-4 would incentivize carbon farming to expand carbon storage capacity on agricultural land and support climate-friendly farming practices in the unincorporated area and encourage the construction of farmworker housing. This group of measures and actions would have potential to benefit agriculture resources.

Energy Measures and Actions. This category includes strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture and forestry resources include those that would result in the construction of new infrastructure to promote renewable energy use and electrification (Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2.a, E-3.2.b, and E-3.3). Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to agriculture and forestry resources include those that support

Measures T-3 and T-5, and which would result in the construction of pedestrian, bicycle, and transit network improvements and zero-emission vehicle infrastructure.

2.2.3.3 Issue 1: Directly or Indirectly Convert Agricultural Resources

This section describes the potential impact related to direct or indirect conversion of agricultural resources that would result from implementation of the CAP Update measures.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Agricultural Resources* (County of San Diego 2015), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, provides guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

Direct Conversion of Agricultural Resources

Based on the County's guidelines, a project would result in a significant direct impact on agricultural resources as a result of project implementation if:

- The project site has important agricultural resources as defined by the County's 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 site for agricultural use.

Indirect Conversion of Agricultural Resources

Based on the County's guidelines, a project would result in a significant indirect impact on agricultural resources as a result of project implementation if:

- The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act 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 1 mile of an agricultural operation or land under a Williamson Act 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 would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act contract.

Impact Analysis

2011 GPU PEIR Determination

Direct Conversion of Agricultural Resources

The 2011 GPU PEIR evaluated direct conversion of agricultural resources related to the adoption of the goals and policies contained within the General Plan and development anticipated through the planning horizon. The 2011 GPU PEIR determined that development anticipated through the planning horizon would result in a potentially significant direct impact to agricultural resources. The 2011 GPU PEIR determined that agricultural conversion could be reduced through a combination of the following:

- Complying with a combination of federal, state, and local regulations and existing County regulatory processes to protect agricultural resources in the county from conversion, including the Farmland Protection Policy Act, Right to Farm Act, Williamson Act, California Farmland Conservancy Program, Open Space Subvention Act, Farmland Mapping and Monitoring Program, Farm and Ranch Lands Protection Program, San Diego County BOS Policies I-38 and I-133, the San Diego County Farming Program, San Diego County zoning regulations (e.g., density and lot size restrictions), the County discretionary review process, and policies identified in community plans.
- Implementing the General Plan policies to protect agricultural operations and preserve agricultural lands through requiring sustainable subdivision design, lower-density land use designations, parcel size reductions, and conservation easements (e.g., Policies LU-6.4, LU-7.1, LU-7.2, and COS-6.4).
- Implementing the mitigation measures (Mitigation Measures Agr-1.1 through Agr-1.5) identified in the 2011 GPU PEIR that promote the protection of existing agricultural lands and operations.

Although the General Plan policies and 2011 GPU PEIR mitigation measures would reduce the potential for agricultural conversion, these policies and mitigation measures would not reduce the impact to a less-than-significant level because the General Plan would allow growth and development on land that supports agricultural uses. The impact related to direct agricultural conversion in the 2011 GPU PEIR was, therefore, determined to be significant and unavoidable. The discussion of the impact related to direct agricultural conversion can be found in Section 2.2, "Agricultural Resources" (pages 2.2-12 through 2.2-20, 2.2-27, and 2.2-29), and is incorporated herein by reference.

Indirect Conversion of Agricultural Land

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 development anticipated through the planning horizon. The 2011 GPU PEIR determined that the development anticipated through the planning horizon would result in potentially significant indirect impacts to agricultural resources. The 2011 GPU PEIR determined that agricultural conversion could be reduced through a combination of the following:

- Complying with the federal, state, and local regulations and existing County regulatory processes to protect agricultural resources in the county from conversion, as listed in the “Direct Conversion of Agricultural Land” section above.
- Implementing adopted General Plan Policies COS-6.2 and COS-6.3, which would reduce the potential for agricultural conversion from encroachment of incompatible land uses.
- Implementing Mitigation Measures Agr-1.1 through Agr-1.5, which would preserve and protect existing agricultural lands and operations from development and adjacent uses.

The 2011 GPU PEIR concluded that the impact related to indirect agricultural resources conversion would be reduced through implementation of a combination of the adopted General Plan goals and policies and the mitigation measures identified in the 2011 GPU PEIR, but not to a less-than-significant level because the General Plan would designate land uses that would allow additional growth and development that could indirectly result in the conversion of agricultural land uses. The indirect agricultural impacts of the General Plan were, therefore, determined to be significant and unavoidable. The discussion of impacts related to indirect agricultural conversion can be found in Section 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 incorporated herein by reference.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures to result in direct and indirect agricultural conversion.

Solid Waste Measures and Actions

The CAP Update includes measures and actions to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture resources include those that would result in the development of new or expanded recycling and composting facilities. For example, Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b include development of zero waste policies and improvements to waste management practices that may result in new or expanded composting and recycling facilities to increase waste diversion from landfills. Specific locations for new and expanded facilities have not been identified. Therefore, these improvements are analyzed at a programmatic level.

As discussed in Section 2.2.1.1, the county contains approximately 181,635 acres of Important Farmland and 404,758 acres of agricultural preserves. Specific locations for new and expanded solid waste facilities have not been identified, but it is assumed that the development of these facilities would occur in accordance with the General Plan. Specifically, Policy LU-16.1 requires that new solid waste management identified in the San Diego County Integrated Waste Management Plan (County of San Diego 2005) are sited in a manner that minimizes environmental impacts and in accordance with applicable local land use policies. Policy LU-16.3 encourages the establishment of new recycling and resource recovery facilities in areas with industrial land use designations or other appropriate areas based on the type of recycling. For example, the General Plan states that some agricultural areas may be appropriate for management or recycling agricultural waste (i.e., composting). Therefore, it is not anticipated that new or expanded solid waste facilities would be sited in areas designated as Important Farmland or in areas defined by the County's LARA Model as important agricultural resources, except in instances where such facilities would support ongoing agricultural operations. Additionally, Policy COS-6.2 requires development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture. Therefore, it is not anticipated that solid waste facilities would be sited in areas where operation of these facilities could interfere with nearby agricultural operations. Because development of new and expanded solid waste facilities would occur in accordance with the General Plan, the indirect or direct conversion of agricultural land to non-agricultural use would be consistent with the potential for conversion disclosed in the 2011 GPU PEIR.

Based on the discussion above, implementation of solid waste measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of agricultural resources.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Actions W-1.1, W-2.2, W-2.3, and W-2.4 include development of policies that may result in the construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would occur in conjunction with existing or proposed development and would not result in the potential for substantial conversion of agricultural land in excess of the potential for conversion disclosed in the 2011 GPU PEIR. Rather, these actions would facilitate water efficiency and conservation for existing development and new development as it is approved. Further, these actions could indirectly support agricultural operations by

ensuring that unincorporated areas in the county would continue to have adequate water supplies. Accordingly, the indirect or direct conversion of agricultural land to non-agricultural use is not anticipated.

Based on the discussion above, water and wastewater measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of agricultural resources.

Agriculture and Conservation Measures and Actions

The CAP Update includes measures and actions to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Actions A-1.1, A-1.2, A-1.2.a, A-3.1, A-4.1, and A-4.1.c would result in acquiring and managing conservation lands and improving land management practices on existing agricultural land to improve carbon sequestration. These actions would be consistent with General Plan Policies LU-7.1, COS-6.2, and COS-6.4, which were adopted for the purpose of protecting agricultural operations and preserving agricultural lands. Some actions could result in the conversion of existing General Plan land uses by dedicating existing agricultural land (including Important Farmland and areas identified as agricultural resources by the County's LARA Model) in the unincorporated county for agricultural uses in perpetuity. Action A-4.1.b would result in the evaluation of opportunities for future construction of farmworker housing. This action has potential to indirectly result in the development of farmworker housing to reduce emissions from farmworker transportation. New farmworker housing would be constructed as an accessory use to support existing agricultural operations. Accordingly, the indirect or direct conversion of agricultural land to non-agricultural use is not anticipated.

Based on the discussion above, implementation of agriculture and conservation measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of agricultural resources.

Energy Measures and Actions

The CAP Update includes measures and actions to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2.a, E-3.2.b, and E-3.3 include development of policies and programs that may result in the construction of new small- and large-scale infrastructure to promote renewable energy use and electrification.

Small-Scale Renewable Energy Systems

CAP Update Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2.a, E-3.2.b, and E-3.3 have potential to result in the development of small-scale renewable energy systems. Programs would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and energy storage systems and small-scale wind turbines (roof- or ground-mounted systems). With the exception of wind turbines, these types of improvements would be made to existing

buildings or would be made in connection with new development as it is approved. These energy infrastructure improvements are not expected to occur on or adjacent to agricultural lands, except in instances where such infrastructure would support ongoing agricultural operations.

Specific locations for new small-scale wind turbines have not been identified; however, these facilities would be developed in accordance with the County's Wind Energy Ordinance. Some small wind turbines would be roof-mounted and would not result in ground disturbance, while others would require the erection of turbine towers and construction of concrete foundations. Small-scale wind turbines could be installed in areas designated as Important Farmland; however, these turbines would be permitted as accessory uses and would not convert farmland to a non-agricultural use. The purpose of a small wind turbine is to generate energy that can be used to provide a reliable power source for uses such as homes, agricultural facilities, or small businesses; therefore, small wind turbines would assist in agricultural operations (County of San Diego 2012). Accordingly, the indirect or direct conversion of agricultural land to non-agricultural use is not anticipated.

Large-Scale Renewable Energy Systems

Implementation of CAP Update Action E-3.3 has potential to indirectly result in the development of large-scale renewable energy systems to satisfy increased demand for renewable energy. These systems could include solar photovoltaic (PV), concentrator solar, and large-scale wind turbines. Because the demand generated by such programs and the types of renewable energy systems that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes impacts would be associated with the most prevalent current technologies.

Large-scale renewable energy facilities would vary in size and could be as large as several thousand acres. It is anticipated that these facilities would be constructed in primarily undeveloped locations that are suitable for generating renewable energy. 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 that relies on large amounts of land unencumbered by buildings or shadowed by buildings or trees. Suitable locations could include areas with existing agricultural land or adjacent to existing agricultural land.

The construction of large-scale renewable energy facilities could result in the direct conversion of several thousand acres of agricultural land to non-agricultural use. Additionally, indirect conversion of agricultural resources has potential to occur if the operation of a facility is incompatible with adjacent agricultural land uses. For example, tall structures (e.g., PV panels, wind turbines, water tanks, and measurement towers) could generate shade and prevent crops from receiving adequate sunlight. In addition, construction and maintenance activities could generate air pollutant emissions, dust, and noise that could interfere with adjacent agricultural operations (e.g., cause damage to crops or livestock).

Each large-scale renewable energy project would be required to obtain applicable permits (e.g., Administrative Permit or Major Use Permit). During the permit process, individual projects would be reviewed to ensure that the physical character (i.e., scale, bulk, coverage, and density) of each project complies with the County's zoning regulations and is compatible with adjacent properties. In addition, the physical characteristics of the site would be reviewed to determine if the site is suitable for the type and intensity of the proposed use or development. Large-scale wind turbine systems are further governed by the County's Wind Energy Ordinance, which sets forth requirements related to location, size, design, and operating characteristics of proposed facilities.

In addition, each large-scale renewable energy project would be required to undergo evaluation for project-specific impacts under CEQA at the time of application. As applicable, individual projects would be required to demonstrate consistency with General Plan Policies COS-6.2 and COS-6.3 and implement the 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Agr-1.1 through Agr-1.5) listed in Section 2.2.2.3 that are intended to protect existing agricultural operations from being converted to other land uses and from encroachment of incompatible land uses. Large-scale wind turbine systems would also need to comply with Mitigation Measure M-AGR-1, identified in the 2013 Wind Energy Ordinance EIR, which requires that project-specific mitigation be incorporated, where applicable, to minimize or eliminate impacts related to the direct or indirect conversion of agricultural resources to the extent feasible (see Section 2.2.5.1). Examples of standard mitigation measures include avoidance of agricultural resources, preservation of agriculture, and inclusion of compatibility buffers near areas intended for agricultural uses. Other large-scale renewable energy projects would be required to incorporate similar types of project-specific mitigation, as identified during the CEQA process.

Mitigation Measure M-AGR-1 has been modified and incorporated into CAP Update Mitigation Measure Agr-1, which requires that all large-scale renewable energy projects (including both solar and wind projects) apply the County Guidelines for Determining Significance for Agricultural Resources. When impacts to farmland are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures, including avoidance of agricultural resources, preservation of agriculture, and inclusion of compatibility buffers near areas intended for agricultural uses. However, it cannot be guaranteed that impacts related to the indirect or direct conversion of agricultural land to non-agricultural use would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, impacts related to the indirect or direct conversion of agricultural land to non-agricultural use would be significant and unavoidable.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-3.1, T-3.1.a, T-3.1.b, T-5.1, and T-6.2 would include the development of plans and programs that may result in the construction of pedestrian, bicycle, and transit network improvements and

zero-emission vehicle infrastructure. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements, when considered separately from the future development that they may accompany, are not expected to result in the direct or indirect conversion of agricultural lands.

Based on the discussion above, implementation of built environment and transportation measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of agricultural resources.

Summary

Based on the discussion above, solid waste, water and wastewater, agriculture and conservation, small-scale renewable energy, and built environment and transportation measures and actions that would be implemented under the CAP Update are not anticipated to result in the direct and indirect conversion of agricultural resources. However, large-scale renewable energy projects could result in the direct or indirect conversion of agricultural resources. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to direct or indirect conversion of agricultural resources would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, large-scale renewable energy facilities would have a potentially significant impact related to direct or indirect conversion of agricultural resources. The 2011 GPU PEIR concluded that the impact related to direct and indirect agricultural conversion would be significant and unavoidable, and implementation of the CAP Update **would not result in a new or more severe impact.**

2.2.3.4 Issue 2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands

This section describes the potential impact related to conflicts with agricultural or forest zoning that would result from implementation of the CAP Update measures. As discussed in Section 2.2.1.2, “Forestry Resources,” the County does not include lands zoned specifically for forest land, timberland, or timberland production. The County also does not have land use authority over development in national forests, such as Cleveland National Forest, where most of the county’s forest land exists. Therefore, implementation of the CAP Update would have no impact related to conflicts with zoning for forest land or timberland and this topic is not discussed further.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Agricultural Resources* (County of San Diego 2015), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, provides guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Conflict with existing zoning for agricultural use, or a Williamson Act contract.

Direct Impacts to Williamson Act Contract Lands

Based on the County's guidelines, any conflict with a Williamson Act contract or the Williamson Act is significant because conflicts with contract provisions and the Williamson Act are prohibited by law. Furthermore, no project may be approved that is in conflict with a Williamson Act contract or the Williamson Act.

Indirect Impacts to Williamson Act Contract Lands

Based on the County's guidelines, a project would result in a significant indirect impact related to conflicts with agricultural zoning or with Williamson Act contract lands as a result of project implementation if:

- The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act 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 1 mile of an agricultural operation or land under a Williamson Act 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 would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act contract.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated potential land use conflicts between Williamson Act contracts, provisions of the Williamson Act, and existing zoning for agricultural use and the adoption of the goals and policies contained within the plan and development

anticipated through the planning horizon. The 2011 GPU PEIR determined that the development anticipated through the planning horizon would result in potentially significant impacts to Williamson Act contract lands, but these impacts would be reduced to a less-than-significant level through a combination of the following:

- Complying with a combination of federal, state, and local regulations and existing County regulatory processes to protect agricultural resources in the county, including the Farmland Protection Policy Act, Right to Farm Act, Williamson Act, California Farmland Conservancy Program, Open Space Subvention Act, Farmland Mapping and Monitoring Program, Farm and Ranch Lands Protection Program, San Diego County BOS Policies I-38 and I-133, the San Diego County Farming Program, San Diego County zoning regulations (e.g., density and lot size restrictions), the County discretionary review process, and policies identified in community plans.
- Implementing the General Plan policies that promote the protection of agricultural lands and compatible land uses adjacent to agricultural lands (e.g., Policies LU-7.1, and COS-6.3).
- Implementing the mitigation measure (Mitigation Measure Agr-2.1) identified in the 2011 GPU PEIR that promotes the protection of Williamson Act Contract lands.

The 2011 GPU PEIR determined that the impact related to conflicts with Williamson Act contract lands and agricultural zoning could be reduced to a less-than-significant level through compliance with the regulations and implementation of the adopted General Plan policies and mitigation measure listed above. The discussion of the impact related to conflicts with Williamson Act contracts and agricultural zoning can be found in Section 2.2, “Agricultural Resources” (pages 2.2-20 through 2.2-23, 2.2-28, and 2.2-31), of the 2011 GPU PEIR, and is incorporated herein by reference.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures to result in conflicts with agricultural zoning and Williamson Act contracts.

Solid Waste Measures and Actions

The CAP Update measures and actions to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture resources include those that would result in the development of new or expanded recycling and composting facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

As discussed in Section 2.2.1.1, approximately 31 percent of lands within the unincorporated county are zoned for agricultural use. Specific locations for new and expanded solid waste facilities have not been identified, but the development of these

facilities would occur in accordance with the General Plan. As discussed under Issue 1 above, the development of solid waste management facilities and recycling and resource recovery facilities would comply with General Plan Policies LU-16.1, LU-16.3, and COS-6.2. In accordance with these policies, new recycling and resource recovery facilities would be sited in areas with industrial land use designations or other appropriate areas based on the type of recycling. Appropriate buffers, setbacks, and project design measures would be required for new development that occurs adjacent to agricultural operations. Certain types of recycling processing and collection facilities and organic materials processing are permitted uses within the County's Limited Agricultural and General Agricultural land use designations, but the development of these facilities would be subject to limitations or use permits. These types of facilities are intended to support existing agricultural operations and would not result in conflicts with existing agricultural land uses.

As discussed in Section 2.2.1.1, approximately 84,821 acres of land within the unincorporated county are enrolled in a Williamson Act contract. As noted in the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Agricultural Resources*, the County would not approve any projects, including any new solid waste facilities, that are in conflict with a Williamson Act contract or the Williamson Act (County of San Diego 2015). Therefore, new or expanded solid waste facilities would not be sited in areas enrolled in a Williamson Act contract, except in instances where such facilities would support ongoing agricultural operations. Accordingly, development of new or expanded solid waste facilities would not result in conflicts with Williamson Act contracts.

Based on the discussion above, solid waste measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to conflicts with agricultural zoning and Williamson Act contracts.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Actions W-1.1, W-2.2, W-2.3, and W-2.4 include development of policies that may result in the construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would not result in development that would be incompatible with existing agricultural zoning or Williamson Act contracts; rather, these actions would facilitate water efficiency and conservation for new development as it is approved. These infrastructure improvements, when considered separately from the future development that they may accompany, are not expected to occur on or adjacent to agricultural lands, except in

instances where such infrastructure would support water-efficient irrigation practices for ongoing agricultural operations. Accordingly, conflicts with agricultural zoning and Williamson Act contracts from water and wastewater measures and actions are not anticipated.

Based on the discussion above, implementation of water and wastewater measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to conflicts with agricultural zoning or Williamson Act contracts.

Agriculture and Conservation Measures and Actions

The CAP Update includes measures and actions to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. For example, Actions A-1.1, A-1.2, A-1.2.a, A-3.1, A-4.1, and A-4.1.c would result in acquiring and managing conservation lands and improving land management practices on existing agricultural land to improve carbon sequestration. These actions would be consistent with General Plan Policies LU-7.1, COS-6.2, and COS-6.4, which were adopted for the purpose of protecting agricultural operations and preserving agricultural lands. Some actions could result in the dedication of existing agricultural land in the unincorporated county for agricultural uses in perpetuity. Therefore, these actions could increase the acreage of lands designated for agricultural land uses within the unincorporated county. Action A-4.1.b would result in the evaluation of opportunities for future construction of farmworker housing. This action has potential to indirectly result in the development of farmworker housing to reduce emissions from farmworker transportation. New farmworker housing would be constructed as an accessory use to support existing agricultural operations. Accordingly, conflicts with agricultural zoning and Williamson Act contracts from agriculture and conservation measures and actions are not anticipated.

Based on the discussion above, implementation of agriculture and conservation measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to conflicts with agricultural zoning and Williamson Act contracts.

Energy Measures and Actions

The CAP Update includes measures and actions to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2.a, E-3.2.b, and E-3.3 include development of policies and programs that may result in the construction of new small- and large-scale infrastructure to promote renewable energy use and electrification.

Small-Scale Renewable Energy Systems

CAP Update Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2.a, E-3.2.b, and E-3.3 have potential to result in the development of small-scale renewable energy systems. Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar

and energy storage systems and small-scale wind turbines (roof- or ground-mounted systems). With the exception of wind turbines, these types of improvements would be made to existing buildings or would be made in connection with new development as it is approved. These energy infrastructure improvements, when considered separately from the future development that they may accompany, are not expected to occur on or adjacent to agricultural lands, except in instances where such infrastructure would support ongoing agricultural operations.

Specific locations for new small-scale wind turbines have not been identified; however, these facilities would be developed in accordance with the County's Wind Energy Ordinance. The County's Wind Energy Ordinance permits small wind turbines (as an accessory use) in zones where agricultural production is allowed. Small wind turbines and other accessory uses are not specifically permitted by current Williamson Act regulations but are typically permitted if these uses are compatible with existing agricultural operations. The purpose of a small wind turbine is to generate energy that can be used to provide a reliable power source for uses such as homes, agricultural facilities, or small businesses; therefore, small wind turbines would assist in agricultural operations. Additionally, because the space requirements necessary to construct and operate small wind turbine would be relatively small and because these facilities would be permitted as accessory uses (including [potentially] lands entered into Williamson Act contracts), small wind turbines would not substantially alter or impact the viability of active agricultural operations. Small wind turbines would not preclude agricultural operations on agriculturally zoned lands, existing lands with Williamson Act contracts, or lands entered into Williamson Act contracts (County of San Diego 2012: 2.2-11). Accordingly, conflicts with agricultural zoning and Williamson Act contracts from energy measures and actions are not anticipated.

Large-Scale Renewable Energy Systems

Implementation of CAP Update Action E-3.3 has potential to indirectly result in the development of large-scale renewable energy systems to satisfy increased demand for renewable energy. These systems would include development of solar energy generation technologies such as PV and concentrator solar, and large-scale wind turbines. Because the demand generated by such programs and the types of renewable energy systems that would be constructed to satisfy demand are unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes use of commonly utilized solar and wind generation technologies.

Large-scale renewable energy facilities would vary in size and could be as large as several thousand acres. It is anticipated that these facilities would be constructed in primarily undeveloped locations that are suitable for generating renewable energy. 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 that relies on large amounts of land unencumbered by buildings or shadowed by buildings or trees. Suitable locations could include areas with agricultural zoning. Large-scale renewable energy facilities are not likely to be proposed

on lands enrolled in a Williamson Act contract, but suitable locations could include areas adjacent to Williamson Act contract lands.

The construction of large-scale renewable energy facilities in areas with agricultural zoning would result in conflicts with the County's Zoning Ordinance. Additionally, indirect impacts on agriculturally zoned lands or lands enrolled in a Williamson Act contract have potential to occur if the operation of a facility is incompatible with adjacent agricultural land uses. For example, tall structures (e.g., PV panels, wind turbines, water tanks, and measurement towers) could generate shade and prevent crops from receiving adequate sunlight. In addition, construction and maintenance activities could generate air pollutant emissions, dust, and noise that could interfere with adjacent agricultural operations (e.g., cause damage to crops or livestock).

Each large-scale renewable energy project would be required to obtain applicable permits (e.g., Administrative Permit or Major Use Permit). During the permit process, individual projects would be reviewed to ensure that the physical character (i.e., scale, bulk, coverage, and density) of each project complies with the County's zoning regulations and is compatible with adjacent properties. In addition, the physical characteristics of the site would be reviewed to determine if the site is suitable for the type and intensity of the proposed use or development. Large-scale wind turbine systems are further governed by the County's Wind Energy Ordinance, which sets forth requirements related to location, size, design, and operating characteristics of proposed facilities.

Each large-scale renewable energy project also would be required to undergo evaluation for project-specific impacts under CEQA at the time of application. As applicable, individual projects would be required to demonstrate consistency with General Plan policies (Policies LU-7.1 and COS-6.3) and implement the 2011 GPU PEIR mitigation measure (Agr-2.1) listed in Section 2.2.2.3 that are intended to protect existing agricultural operations from being converted to other land uses and from encroachment of incompatible land uses. Large-scale wind turbine systems would also need to comply with Mitigation Measure M-AGR-1, identified in the 2013 Wind Energy Ordinance EIR, which requires that project-specific mitigation be incorporated, where applicable, to minimize or eliminate impacts related to conflicts with agricultural zoning and Williamson Act contracts to the extent feasible (see Section 2.2.5.2). Examples of standard mitigation measures include avoidance of agricultural resources, preservation of agriculture, and inclusion of compatibility buffers near areas intended for agricultural uses. Other large-scale renewable energy projects would be required to incorporate similar types of project-specific mitigation, as identified during the CEQA process.

Mitigation Measure M-AGR-1 has been modified and incorporated into CAP Update Mitigation Measure Agr-1, which requires that all large-scale renewable energy projects (including both solar and wind projects) apply the County Guidelines for Determining Significance for Agricultural Resources. When impacts to farmland are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures, including avoidance of agricultural resources, preservation of agriculture, and inclusion of compatibility buffers near areas intended for agricultural uses. However, it cannot be guaranteed that impacts related to conflicts with agricultural

zoning and Williamson Act contracts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, impacts related to conflicts with agricultural zoning and Williamson Act contracts would be significant and unavoidable.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-3.1, T-3.1.a, T-3.1.b, T-5.1, and T-6.2 would include the development of plans and programs that may result in the construction of pedestrian, bicycle, and transit network improvements and zero-emission vehicle infrastructure. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements are not expected to occur on or adjacent to agricultural lands. Accordingly, conflicts with agricultural zoning and Williamson Act contracts from built environment and transportation measures and actions are not anticipated.

Based on the discussion above, implementation of built environment and transportation measures and actions proposed in the CAP Update would result in less-than-significant impacts related to conflicts with agricultural zoning and Williamson Act contracts.

Summary

Based on the discussion above, solid waste, water and wastewater, agriculture and conservation, small-scale renewable energy, and built environment and transportation measures and actions that would be implemented under the CAP Update are not anticipated to result in conflicts with agricultural zoning and Williamson Act contracts. However, large-scale renewable energy projects could result in conflicts with agricultural zoning and Williamson Act contracts. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to conflicts with agricultural zoning and Williamson Act contracts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, large-scale renewable energy facilities would have a potentially significant impact related to conflicts with agricultural zoning and Williamson Act contracts (**Impact AG-2**). The 2011 GPU PEIR concluded that the impact related to direct and indirect agricultural conversion would be less than significant, and implementation of the CAP Update **would result in a new significant impact** not disclosed in the 2011 GPU PEIR.

2.2.3.5 Issue 3: Result in the Loss or Direct or Indirect Conversion of Forest Land

This section describes the potential impact related to direct or indirect conversion of or loss of forest land that would result from implementation of the CAP Update measures.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, a 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 a 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.

The County of San Diego has not published specific guidelines for determining significant impacts related to the loss of forest land or conversion of forest land to non-forest use under CEQA.

Impact Analysis

2011 GPU PEIR Determination

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

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures to result in direct or indirect conversion or loss of forest land.

Solid Waste Measures and Actions

The CAP Update includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to forest resources include those that would result in the development of new or expanded recycling and composting facilities (e.g., Actions SW-1.1, SW-2.1, SW-4.1.a, and SW-4.1.b).

As discussed in Section 2.2.1.2, the county does not include lands zoned specifically for forest land, timberland, or timberland production. However, forest resources may be present in areas within the County's jurisdiction, including areas surrounding state parks and national forests. California Public Resources Code Section 12220(g) 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. Forest land could occur in many portions of the county, but the presence of forest land would need to be verified through site-specific analysis.

As discussed under Issues 1 and 2 above, specific locations for new and expanded solid waste facilities have not been identified, but these facilities would be developed in accordance with the General Plan (i.e., Policies LU-16.1 and LU-16.3 regarding the siting of new solid waste management facilities and recycling and resource recovery facilities). In accordance with these policies, development of new recycling and resource recovery facilities would occur in areas with industrial land use designations or other appropriate areas based on the type of recycling. For example, the General Plan states that some agricultural areas may be appropriate for management or recycling agricultural waste (i.e., composting). Compliance with General Plan policies would ensure that new or expanded solid waste facilities would not be sited in areas managed for forest resources. Accordingly, development of new or expanded solid waste facilities would not result in the direct or indirect conversion of forest land.

Implementation of solid waste measures and actions proposed in the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of forest land due to the limited presence of forest land in the county and compliance with established County policies.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Actions W-1.1, W-2.2, W-2.3, and W-2.4 include development of policies that may result in the construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would not result in the conversion of any land uses. Rather, these actions would facilitate water efficiency and conservation for existing development and new development as it is approved. These infrastructure improvements, when considered separately from the future development that they may accompany, are not expected to occur on forest lands. Accordingly, water and wastewater measures and actions would not result in the direct or indirect conversion of forest land. Implementation of water and wastewater measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of forest land.

Agriculture and Conservation Measures and Actions

The CAP Update includes measures and actions to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. For example, Actions A-1.1, A-1.2, A-1.2.a, A-3.1, A-4.1, and A-4.1.c would result in acquiring and managing conservation lands and improving land management practices on existing agricultural land to improve carbon sequestration. Some actions could result in the conversion of existing General Plan land uses by dedicating existing agricultural land in the unincorporated county for agricultural uses in perpetuity. These actions would apply to areas that are already used for agricultural operations and would not result in the development of agricultural uses in areas with existing forest land. Action A-4.1.b would result in the evaluation of opportunities for future construction of farmworker housing. This action has potential to indirectly result in the development of farmworker housing to reduce emissions from farmworker transportation. New farmworker housing would be constructed as an accessory use to support existing agricultural operations. Therefore, agriculture and conservation measures and actions would result in less-than-significant impacts related to the direct or indirect conversion of forest land.

Energy Measures and Actions

The CAP Update includes measures and actions to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2.a, E-3.2.b, and E-3.3 include development of policies and programs that may result in the construction of new infrastructure to promote renewable energy use and electrification.

Small-Scale Renewable Energy Systems

CAP Update Actions E-1.1, E-2.1, E-2.2, E-3.1 E-3.2.a, E-3.2.b, and E-3.3 have potential to result in the development of small-scale renewable energy systems. Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and energy storage systems and small-scale wind turbines (roof- or ground-mounted systems). With the exception of wind turbines, these types of improvements would be made to existing buildings or would be made in connection with new development as it is approved. These energy infrastructure improvements, when considered separately from the future development that they may accompany, are not expected to occur on or adjacent to forest lands.

Specific locations for new small-scale wind turbines have not been identified; however, these facilities would be developed in accordance with the County's Wind Energy Ordinance. As described on page 2.2-14 of the 2013 Wind Energy EIR, some small wind turbines would be roof-mounted and would not result in ground disturbance, while others would require the erection of turbine towers and construction of concrete foundations. However, the Wind Energy Ordinance permits small wind turbines as accessory uses to existing development under the zoning verification and would not convert forest land to a

non-forest use (County of San Diego 2012). Accordingly, the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of forest land from the development of small-scale renewable energy systems.

Large-Scale Renewable Energy Systems

Implementation of CAP Update Action E-3.3 has potential to indirectly result in the development of large-scale renewable energy systems to satisfy increased demand for renewable energy. These systems would include solar energy development technologies such as solar PV and concentrator solar, and large-scale wind turbines. Because the demand generated by such programs and the types of renewable energy systems that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assuming development of commonly used technologies.

Large-scale renewable energy facilities would vary in size and could be as large as several thousand acres. It is anticipated that these facilities would be constructed in primarily undeveloped locations that are suitable for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown. 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 that relies on large amounts of land unencumbered by buildings or shadowed by buildings or trees. However, suitable locations for large-scale renewable energy facilities could include areas that qualify as forest land.

The construction of large-scale renewable energy facilities could result in the direct loss or conversion of forest land through ground-disturbing activities, such as excavation and grading. Each large-scale renewable energy project would be required to obtain applicable permits (e.g., Administrative Permit or Major Use Permit). During the permit process, individual projects would be reviewed to ensure that the physical character (i.e., scale, bulk, coverage, and density) of each project is in harmony with the County's zoning regulations and compatible with adjacent properties. In addition, the physical characteristics of the site would be reviewed to determine if the site is suitable for the type and intensity of the proposed use or development. Large-scale wind turbine systems are further governed by the County's Wind Energy Ordinance, which sets forth requirements related to location, size, design, and operating characteristics of proposed facilities.

Each large-scale renewable energy project also would be required to undergo evaluation for project-specific impacts under CEQA at the time of application. Large-scale wind turbine systems would need to comply with Mitigation Measure M-AGR-2, identified in the 2013 Wind Energy Ordinance EIR, which requires that project-specific mitigation be incorporated, where applicable, to minimize or eliminate impacts related to the loss or conversion of forest land to the extent feasible (see Section 2.2.5.3). Examples of standard mitigation measures include avoidance of sensitive resources, preservation of habitat, revegetation, and resource management. Other large-scale renewable energy projects would be required to incorporate similar types of project-specific mitigation, as identified during the CEQA process.

Mitigation Measure M-AGR-2 has been modified and incorporated into CAP Update Mitigation Measure Agr-2, which requires that all large-scale renewable energy projects (including both solar and wind projects) apply the County Guidelines for Determining Significance for Biological Resources. When impacts to forest land are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures, including avoidance of sensitive resources, preservation of habitat, revegetation, and resource management. However, it cannot be guaranteed that impacts related to the loss or conversion of forest land would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, impacts related to the direct and indirect conversion of forest land would be significant and unavoidable.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-3.1, T-3.1.a, T-3.1.b, T-5.1, and T-6.2 would include the development of plans and programs that may result in the construction of pedestrian, bicycle, and transit network improvements and zero-emission vehicle infrastructure. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements are not expected to occur on forest lands. Accordingly, built environment and transportation measures and actions would not result in the direct or indirect conversion of forest land.

Implementation of built environment and transportation measures and actions proposed in the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of forest land.

Summary

Based on the discussion above, solid waste, water and wastewater, agriculture and conservation, small-scale renewable energy, and built environment and transportation measures and actions that would be implemented under the CAP Update are not anticipated to result in the loss or conversion of forest land. However, large-scale renewable energy projects could result in the loss or conversion of forest land. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to the loss or conversion of forest land would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, large-scale renewable energy facilities would have a potentially significant impact related to the loss and conversion of forest land (**Impact AG-3**). Implementation of the CAP Update **would result in a new significant impact** not disclosed in the 2011 GPU PEIR.

2.2.3.6 Cumulative Impact Analysis

The cumulative analysis in the 2011 GPU PEIR provides an evaluation of the San Diego region, including all of San Diego County, Riverside County, Orange County, and Imperial County. This scope of analysis was 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” (see page 2-2.27 of the 2011 GPU PEIR). This analysis uses the same scope identified in the 2011 GPU PEIR. The scope and approach to the cumulative impact analysis are described in the “Cumulative Impact Assessment Overview” section in the introduction to this chapter.

Issue 1: Directly or Indirectly Convert Agricultural Resources

Impacts would be cumulative in nature if the CAP Update in combination with cumulative development would contribute to a regional loss of agricultural resources because of direct or indirect conversion. 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 General Plan.

As discussed in the 2011 GPU PEIR, agricultural resources are in decline in the San Diego region. The decline can be attributed, in part, to the increasing population in the region and subsequent pressures that would require the direct conversion of lands supporting agricultural resources to be converted to non-agricultural uses (see page 2.2-27 of the 2011 GPU PEIR). Accordingly, there is an existing significant cumulative impact with respect to the conversion of agricultural resources from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As described in Section 2.2.3.3, most CAP Update measures and actions would result in direct and indirect benefits to agricultural resources within the cumulative setting. For example, solid waste measures and actions that would result in new facilities for recycling agricultural wastes (i.e., composting) would support ongoing agricultural operations. In addition, water and wastewater measures and actions would indirectly support agricultural operations by ensuring that unincorporated areas in the county would continue to have adequate water supplies. Agricultural and conservation measures and actions would result in the protection of agricultural operations and preservation of agricultural lands. Further, small-scale renewable energy measures and actions would result in new renewable energy infrastructure that would serve as a reliable power source for supporting agricultural operations. Other CAP Update measures and actions not included in the categories listed above would not involve the development of land uses that would result in the direct or indirect conversion of agricultural resources.

However, large-scale renewable energy projects could result in the direct or indirect conversion of agricultural resources. Because projects would be implemented by utility companies in response to the demand generated by CAP Update policies, there is uncertainty regarding the types, locations, and scale of future large-scale renewable energy projects. Although large-scale renewable energy projects would be required to

obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible, it cannot be guaranteed that impacts related to direct or indirect conversion of agricultural resources would be reduced to a level below significance.

Based on the above discussion, implementation of the CAP Update would include measures and actions to ensure the preservation of existing agricultural land and improve land management practices. In addition, implementation of the CAP Update would generally help to prevent the indirect conversion of agricultural resources by ensuring that adequate water and energy resources, as well as agricultural waste facilities, are available to support ongoing agricultural operations. However, large-scale renewable energy projects that could indirectly result from implementation of the CAP Update could result in the conversion of agricultural resources. Accordingly, implementation of the CAP Update would result in a considerable contribution to an existing cumulative effect related to the conversion of agricultural resources, consistent with the conclusion in the 2011 GPU PEIR. There **would not be a new or more severe impact**.

Issue 2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands

Agricultural Zoning and Williamson Act Contract Lands

Impacts would be cumulative in nature if the CAP Update in combination with cumulative development would contribute to a regionally significant impact resulting from conflicts with agricultural zoning and Williamson Act contracts. The 2011 GPU PEIR concluded that cumulative impacts related to Williamson Act contracts and agricultural zoning resulting from the build-out of the General Plan would be less than significant with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures listed above.

As discussed in the 2011 GPU PEIR, incorporated cities and surrounding counties designate and adopt Agricultural Preserves, enter lands into Williamson Act Contracts, and adopt agricultural zoning to protect agricultural resources in the San Diego region (see page 2.2-28 of the 2011 GPU PEIR). Because existing regulations are in place, no existing significant cumulative impact exists with respect to conflicts with agricultural zoning or Williamson Act Contract lands from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As described in Section 2.2.3.4, CAP Update measures and actions would result in land management strategies and installation of new infrastructure and facilities that would be compatible with existing agricultural zoning and Williamson Act contracts. For example, solid waste measures and actions that would result in new facilities for recycling agricultural wastes (i.e., composting) would support ongoing agricultural operations in areas that are zoned for agricultural use or enrolled in Williamson Act contracts. In addition, water and wastewater measures and actions would indirectly support areas zoned for agricultural use and areas enrolled in Williamson Act contracts by ensuring that unincorporated areas in the county would continue to have adequate water supplies.

Agricultural and conservation measures and actions would increase the acreage of lands designated for agricultural land uses within the unincorporated county. Further, energy measures and actions would result in new renewable energy infrastructure that would serve as a reliable power source for supporting agricultural operations. CAP Update measures and actions would not require rezoning because the types of proposed infrastructure and facilities would be allowed within any zone, subject to limitations or use permits. Other CAP Update measures and actions not included in the categories listed above would not result in conflicts with agricultural zoning or Williamson Act contracts.

However, large-scale renewable energy projects could result in conflicts with agricultural zoning or Williamson Act contracts. Because projects would be implemented by utility companies in response to the demand generated by CAP Update policies, there is uncertainty regarding the types, locations, and scale of future large-scale renewable energy projects. Although large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible, it cannot be guaranteed that impacts related to conflicts with agricultural zoning or Williamson Act contracts would be reduced to a level below significance.

Based on the above discussion, implementation of the CAP Update would generally prevent conflicts with agricultural zoning and Williamson Act contracts in the San Diego region through measures and actions to ensure the preservation of existing agricultural land and improve land management practices. In addition, implementation of the CAP Update would ensure that adequate water and energy resources, as well as agricultural waste facilities, are available to support ongoing agricultural operations within areas zoned for agricultural uses or enrolled in Williamson Act contracts. However, large-scale renewable energy projects under the CAP Update could result in conflicts with agricultural zoning or Williamson Act contracts. Therefore, the CAP Update would result in a considerable contribution to an adverse cumulative condition related to conflicts with agricultural zoning or Williamson Act contracts. There **would be a new significant impact** not disclosed in the 2011 GPU PEIR (**Impact-C-AG-2**).

Forest Zoning

Impacts would be cumulative in nature if the CAP Update in combination with cumulative development would contribute to a regionally significant impact resulting from conflicts with forest or timberland zoning. The 2011 GPU PEIR did not evaluate cumulative impacts related to the direct or indirect loss or conversion of forest land.

Regional growth and land use changes within the San Diego region have resulted in and will continue to result new urban development in areas with existing forest resources. Accordingly, there is an existing significant cumulative impact with respect to conflicts with forest zoning from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As discussed in Section 2.2.1.2, "Forestry Resources," the county does not include lands zoned specifically for forest land, timberland, or timberland production. The County also

does not have land use authority over development in national forests, such as Cleveland National Forest, where most of the county's forest land exists. Because implementation of the CAP Update would have no impact related to conflicts with zoning for forest land or timberland, the CAP Update would not result in a new significant cumulative impact related to conflicts with forestry zoning. This impact would be **less than significant**. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 3: Result in the Loss or Direct or Indirect Conversion of Forest Land

Impacts would be cumulative in nature if the CAP Update in combination with cumulative development would contribute to a regionally substantial impact resulting from direct or indirect conversion or loss of forest resources. The 2011 GPU PEIR did not evaluate cumulative impacts related to the conversion or loss of forest resources.

Regional growth and land use changes have resulted in and will continue to result in the conversion or loss of existing forest lands. Accordingly, there is an existing significant cumulative impact with respect to the conversion of forest lands from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As discussed in Section 2.2.1.2, "Forestry Resources," the county does not include lands zoned specifically for forest land, timberland, or timberland production. The County also does not have land use authority over development in national forests, such as Cleveland National Forest, where most of the county's forest land exists. As described in Section 2.2.3.5, most CAP Update measures and actions would not result in the siting new facilities or infrastructure in areas with existing forest land, except in cases where the infrastructure is permitted as an accessory use. However, large-scale renewable energy measures and actions could result in the loss or conversion of forest land. Because projects would be implemented by utility companies in response to the demand generated by CAP Update policies, there is uncertainty regarding the types, locations, and scale of future large-scale renewable energy projects. Although large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible, it cannot be guaranteed that impacts related to loss or conversion of forest land would be reduced to a level below significance.

Because large-scale renewable energy infrastructure built in response to measures and actions in the CAP Update could result in the direct or indirect conversion of forest land within the cumulative setting, the CAP Update would result a considerable contribution to an existing cumulative effect related to the conversion or loss of forest land. There **would be a new significant impact** not identified in the 2011 GPU PEIR (**Impact-C-AG-3**).

2.2.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update may indirectly result in the construction of large-scale renewable infrastructure that would result in new and more severe impacts related to agriculture and forestry resources, as summarized below.

Impact AG-2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to conflicts with agricultural zoning and Williamson Act contracts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects.

Impact AG-3: Result in the Loss or Direct or Indirect Conversion of Forest Land. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to the loss or conversion of forest land would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects.

Impact-C-AG-2: Result in a Cumulatively Considerable Contribution to Conflicts with Agricultural Zoning and Williamson Act Contract Lands. Based on the above discussion, implementation of the CAP Update would generally prevent conflicts with agricultural zoning and Williamson Act contracts in the San Diego region through measures and actions to ensure the preservation of existing agricultural land and improve land management practices. In addition, implementation of the CAP Update would ensure that adequate water and energy resources, as well as agricultural waste facilities, are available to support ongoing agricultural operations within areas zoned for agricultural uses or enrolled in Williamson Act contracts. However, implementation of large-scale renewable energy projects under the CAP Update could result in conflicts with agricultural zoning or Williamson Act contracts.

Impact-C-AG-3: Result in a Cumulatively Considerable Contribution to the Loss or Direct or Indirect Conversion of Forest Land. Large-scale renewable energy infrastructure built in response to measures and actions in the CAP Update could result in the direct or indirect conversion of forest land within the cumulative setting.

2.2.5 Mitigation Measures

2.2.5.1 Issue 1: Directly or Indirectly Convert Agricultural Resources

The following mitigation measures were adopted as part of the 2011 GPU PEIR and are applicable to the CAP Update:

Adopted Mitigation Measure 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.

Adopted Mitigation Measure 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).

Adopted Mitigation Measure 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.

Adopted Mitigation Measure Agr-1.4: Develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land.

Adopted Mitigation Measure 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).

The 2013 Wind Energy Ordinance EIR included the following mitigation measure to minimize the potentially significant impacts related to large wind turbine projects:

Adopted Mitigation Measure M-AGR-1: During the environmental review process for future Major Use Permits 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.

An additional mitigation was considered that would prohibit construction of large wind turbine projects in areas supporting Important Farmland; however, this measure was determined to be infeasible because areas supporting Important Farmland may be located within high-quality wind resource areas. This prohibition within the wind resource areas would conflict with CAP Update objectives to facilitate the use of renewable wind energy within the county, to maximize the production of energy from renewable wind sources, and to reduce the potential for energy shortages and outages by facilitating local energy supply.

A modified version of Mitigation Measure M-AGR-1 shall be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the CAP Update and shall be applied to all large-scale renewable energy projects, including PV and concentrator solar

systems, during the discretionary review process which would be implemented as a condition of receiving a Major Use Permit. As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of discretionary review and project-specific mitigation would minimize or eliminate impacts related to the conversion of agricultural resources to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Mitigation Measure M-AGR-1 from the 2013 Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as follows:

CAP Update Mitigation Measure Agr-1: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Important 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.

CAP Update Mitigation Measure Agr-1 would reduce the potential for significant impacts related to the conversion of agricultural resources; however, it is not possible to guarantee that these impacts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Additional mitigation was contemplated as part of this ~~draft~~ SEIR that would implement a development cap on large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County's goal for expanding renewable energy resources. It is unknown how many individual projects and the specific types of large-scale renewable energy systems that would be required to meet the GHG reduction goals of the CAP Update because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

2.2.5.2 Issue 2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands

The following mitigation measure was adopted as part of the 2011 GPU PEIR and is applicable to the CAP Update:

Adopted Mitigation Measure 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.

The 2013 Wind Energy Ordinance EIR identified Mitigation Measure M-AGR-1, described in Section 2.2.5.1, above, which would be implemented during the discretionary review process for large wind turbines.

An additional mitigation was considered that would prohibit construction of large wind turbine projects in areas zoned for agriculture, areas under Williamson Act contract, and areas near Williamson Act contract lands; however, this measure was determined to be infeasible because high-quality wind resource areas may have agricultural zoning or Williamson Act contracts lands. This prohibition within the wind resource areas would conflict with the project objectives to facilitate the use of renewable wind energy within the county, to maximize the production of energy from renewable wind sources, and to reduce the potential for energy shortages and outages by facilitating local energy supply.

CAP Update Mitigation Measure Agr-1, described in Section 2.2.5.1 above, shall be incorporated into the MMRP for the CAP Update and shall be applied to all large-scale renewable energy projects, including PV and concentrator solar systems, during the discretionary review process, which would be implemented as a condition of receiving a Major Use Permit. As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of a discretionary review application and project-specific mitigation would minimize or eliminate impacts to visual character and quality to the extent feasible in compliance with State CEQA Guidelines Section 15126.4.

CAP Update Mitigation Measure Agr-1 would reduce the potential for significant impacts related to conflicts with agricultural zoning and Williamson Act contracts; however, it is not possible to guarantee that all projects and cumulative impacts to conflicts with agricultural zoning and Williamson Act contracts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future renewable energy projects. Additional mitigation was contemplated as part of this draft SEIR that would implement a development cap upon large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County's goal for expanding renewable energy resources. It is unknown how many individual projects and specific type of large-scale renewable energy systems 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.

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

As discussed in Section 2.2.3.5, above, the 2011 GPU PEIR did not analyze the loss or direct or indirect conversion of forest land; therefore, no mitigation measures were adopted as part of the 2011 GPU PEIR for the purpose of reducing the potential for the loss or conversion of forest land.

The 2013 Wind Energy Ordinance EIR included the following mitigation measure to minimize the potentially significant impacts related to large wind turbine projects:

Adopted Mitigation Measure M-AGR-2: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.

Additional mitigation was considered that would prohibit construction of large wind turbine projects in areas supporting forest land; however, this measure was determined to be infeasible because forest land may be located within high-quality wind resource areas. This prohibition within the wind resource areas would conflict with CAP Update objectives to facilitate the use of renewable wind energy within the county, to maximize the production of energy from renewable wind sources, and to reduce the potential for energy shortages and outages by facilitating local energy supply.

A modified version of Mitigation Measure M-AGR-2 shall be incorporated into the MMRP for the CAP Update that encompasses all large-scale renewable energy projects, including PV and concentrator solar systems, during the discretionary review process which would be implemented as a condition of receiving a Major Use Permit. As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of discretionary review and project-specific mitigation would minimize or eliminate impacts related to the loss or conversion of forest land to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Mitigation Measure M-AGR-2 from the 2013 Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as follows:

CAP Update Mitigation Measure Agr-2: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.

CAP Update Mitigation Measure Agr-2 would reduce the potential for significant impacts related to the loss or conversion of forest land; however, it is not possible to guarantee that these impacts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Additional mitigation was contemplated as part of this ~~draft~~ SEIR that would implement a development cap on large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to

achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County's goal for expanding renewable energy resources. It is unknown how many individual projects and the specific types of large-scale renewable energy systems that would be required to meet the GHG reduction goals of the CAP Update because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

2.2.6 Significance Conclusions

2.2.6.1 Issue 1: Directly or Indirectly Convert Agricultural Resources

With implementation of the CAP Update, large-scale renewable energy projects have potential to result in the direct or indirect conversion of agricultural resources. Even with compliance with existing regulations related to agricultural resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-1, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects. Therefore, the project's impact related to the direct and indirect conversion of agricultural resources would be **significant and unavoidable** and the project **would result in a considerable contribution** to a cumulative impact related to the conversion of agricultural resources could occur. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

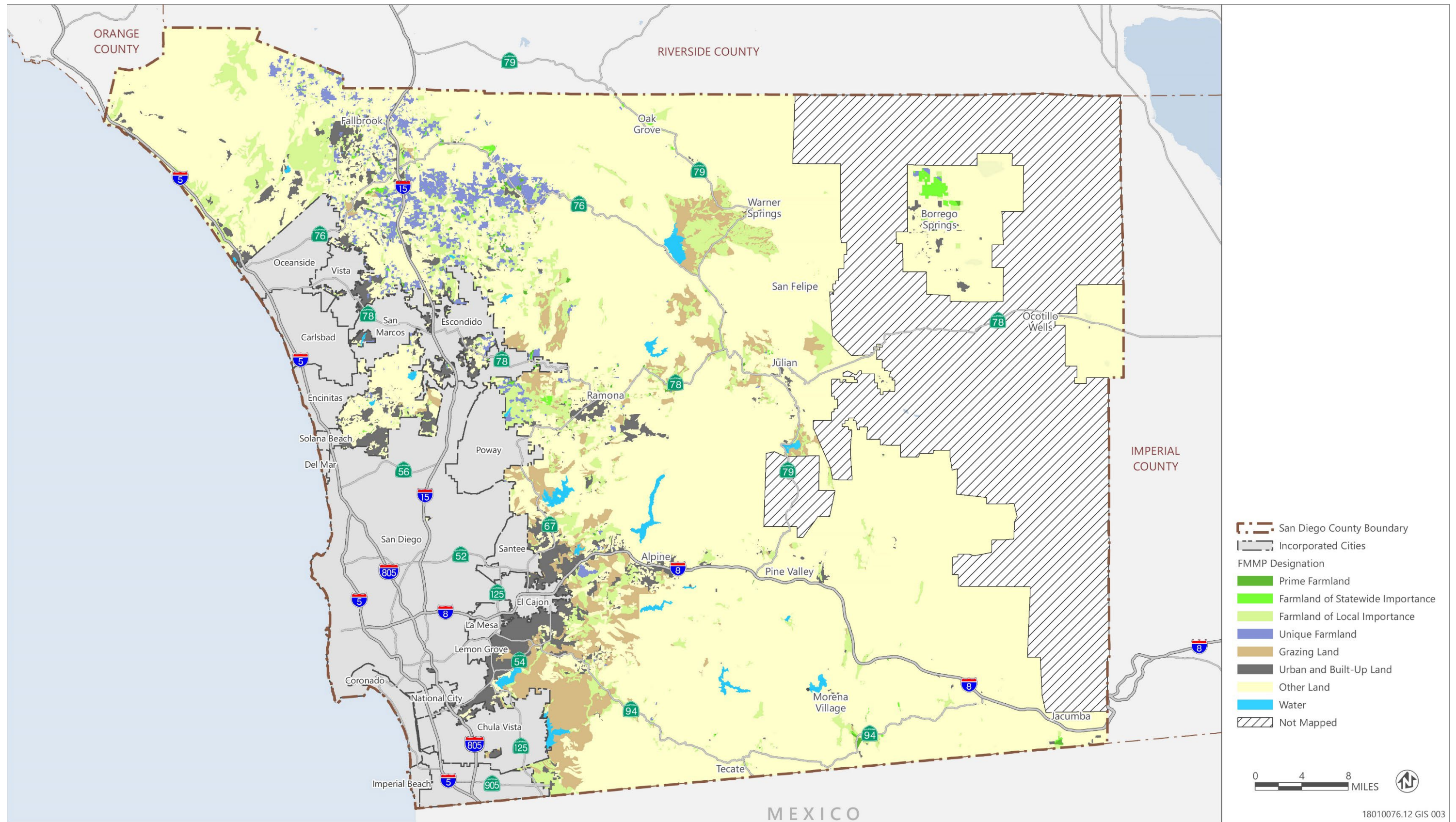
2.2.6.2 Issue 2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands

With implementation of the CAP Update, large-scale renewable energy projects have potential to result in conflicts with agricultural zoning or Williamson Act contracts. Even with compliance with existing regulations related to agricultural resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-1, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects. Therefore, the project's impact related to conflicts with agricultural zoning or Williamson Act contracts would be **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact related to conflicts with agricultural zoning or Williamson Act contracts could occur. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.2.6.3 Issue 3: Result in the Loss or Direct or Indirect Conversion of Forest Land

With implementation of the CAP Update, large-scale renewable energy projects have potential to result in the loss or conversion of forest land. Even with compliance with existing regulations related to forest resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-2, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects. Therefore, the project's impact related to the loss or conversion of forest land would be **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact related to the conversion of agricultural resources could occur. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

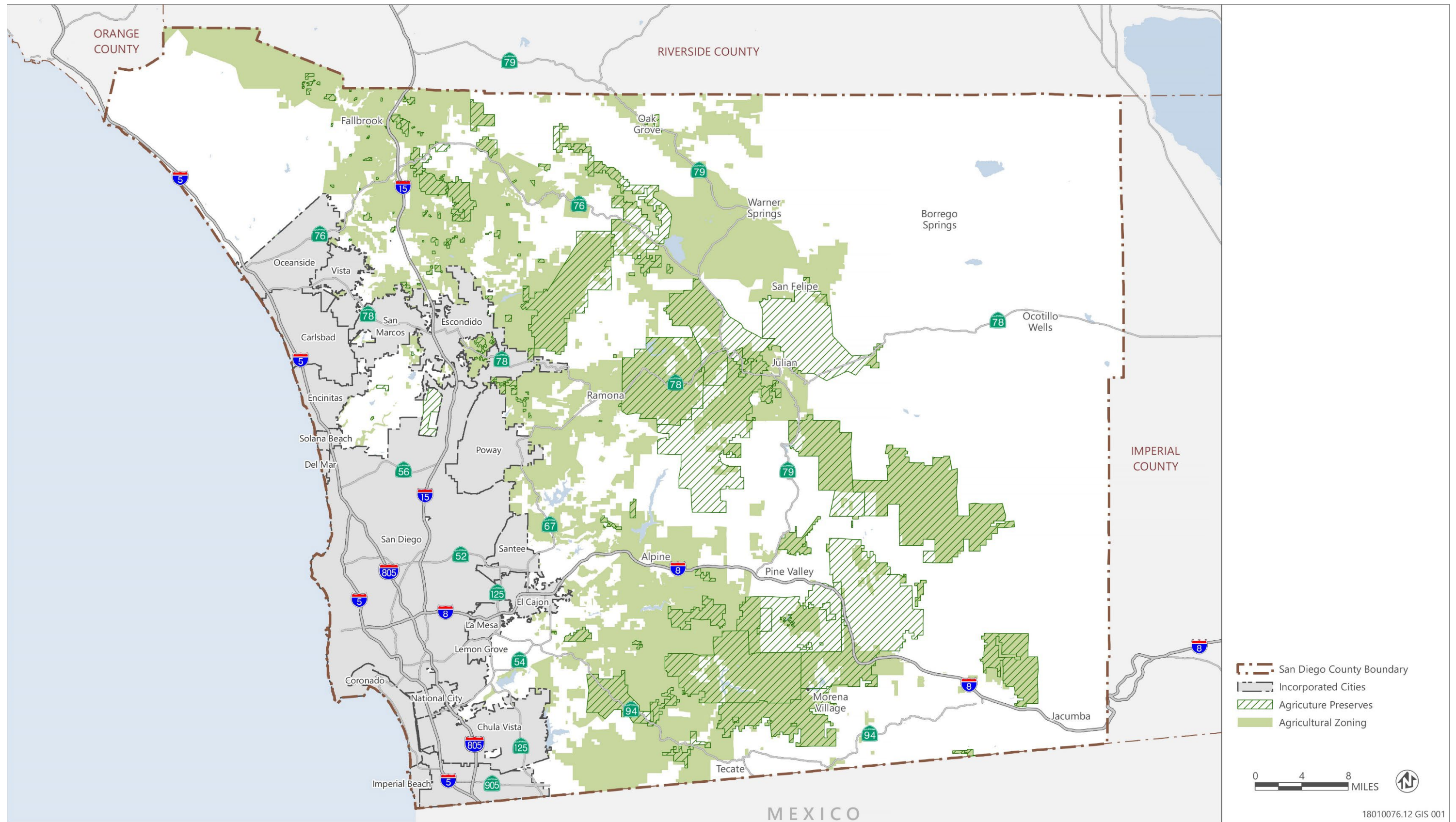
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Sources: Data downloaded from the California Department of Conservation in 2023; adapted by Ascent in 2023.

Figure 2.2-1

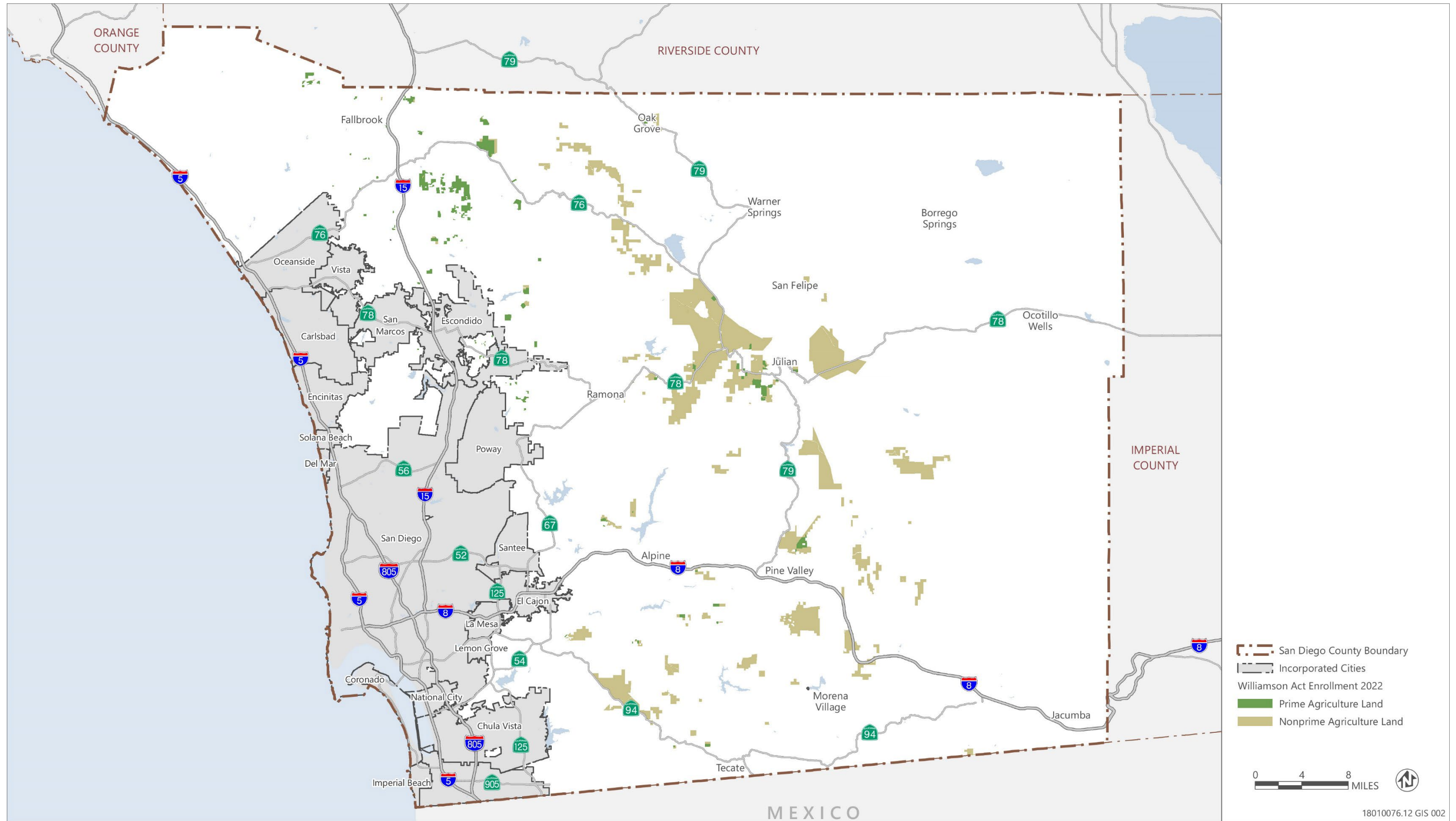
Farmland Designations



Sources: Data downloaded from SanGIS in 2023; adapted by Ascent in 2023.

Figure 2.2-2

Agricultural Zoning



Sources: Data downloaded from the California Department of Conservation in 2023; adapted by Ascent in 2023.

Figure 2.2-3

Williamson Act Enrollment 2022

