

2.2 Agricultural Resources

This section summarizes the results of an agricultural resources technical report prepared by TRS Consultants in November 2010. The complete report is included in Appendix C of the Environmental Impact Report (EIR). The analysis follows the *County of San Diego Guidelines for Determining Significance* and the *Report Format Requirements for Agricultural Resources* (March 19, 2007).

2.2.1 Existing Conditions

Regulatory/Technical Framework

Farmland Mapping and Monitoring Program

Farmland Map

The California Department of Conservation (CDC) Division of Land Resource Protection (DLRP) has developed the Farmland Mapping and Monitoring Program (FMMP) for assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. FMMP produces farmland conversion data in the form of Important Farmland Maps and biennial California Farmland Conversion Reports. DLRP uses the following land designations:

Designation	Characteristics
Prime Farmland	Land with the best combination of physical and chemical features to sustain long-term agricultural production.
Farmland of Statewide Importance	Similar to Prime except with minor shortcomings such as slopes or less ability to store soil moisture.
Unique Farmland	Land with lesser quality soils used for the production of the state's leading agricultural crops.
Farmland of Local Importance	Land deemed to be of importance to the local economy by the County Board of Supervisors.
Grazing	Land on which the existing vegetation is suited to the grazing of livestock.
Urban or Built Up Land	Land occupied by structures by a density of at least 1 unit per 1.5 acres.
Other Land	Land that does not meet the criteria for any other category. Typically includes low-density rural development, heavily forested land, mined land, or government land with use restrictions.
Water	Water areas with at least 40 acres.
Area Not Mapped	Area not mapped by the FMMP.

The site has a designation of Farmland of Statewide Importance, Unique Farmland and Farmland of Local Importance. Farmland of Statewide Importance reflect lands that do not meet the qualities of Prime Farmland, but offer a good combination of physical and chemical criteria, which are useful for producing agricultural products. Unique Farmland is used for producing the state's major high economic value crops on land not qualifying for Prime or Statewide Importance designations. Farmland of Local Importance represents lands that are not Prime Farmland, but have the capability to produce crops that may be important to the local economy, due to the land's productivity potential (FMMP "Important Farmland Mapping Categories and Soil Taxonomy Terms").

Farmland Soils Map

The FMMP soils are based on local soil characteristics and irrigation status, with the best quality land identified as Prime Farmland and Farmland of Statewide Importance. Areas covered by the Placentia sandy loam (PeC) soil type (30 percent of the site) are classified as Statewide Significance Soils and these areas were also mapped Farmland of Statewide Importance. Approximately 27.6 acres of this soil type occur on the project site and are represented in orange on Figure 2.2-1. Thus, the project site supports approximately 27.6 acres of Farmland of Statewide Importance.

Williamson Act Contracts and Agricultural Preserves

Known formally as the California Land Conservation Act of 1965, the Williamson Act contract was formed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The program entails a ten-year contract between the local jurisdiction and the owner of the land whereby the land is taxed on the basis of its agricultural use rather than its market value. The project site is not under a Williamson Act contract and is not within an Agricultural Preserve.

San Diego County General Plan and Bonsall Community Plan

The project site is regionally categorized as Estate Development Area (EDA) and is designated as (19) Intensive Agriculture. The EDA Regional Category of the General Plan permits both agricultural and low density residential uses. Residential parcel sizes range from a minimum of two acres to more than 20 acres. The project proposes lots that range from 2.1 to 5.9 acres in size.

The project site is within the area covered by the Bonsall Community Plan. The Bonsall Community Plan seeks to “preserve and enhance the rural character of Bonsall through the protection of agriculture, estate lots, ridgelines, and the community’s natural resources.” Goals and policies of the Bonsall Community Plan that address agricultural resources are presented in Table 2.2-1.

On-site Agricultural Production

The site has historically been used for growing avocado and citrus trees. The project consists of 92.8 acres. Currently, approximately 90.9 acres of the site are in agricultural production consisting of avocados, lemons, oranges, and cut flowers.

On-site agricultural operations have been conducted since the 1960s, with avocado trees, and with citrus planted subsequently. Other citrus, including tangerines, lemons, and oranges have been planted, due to the removal of avocado trees from root rot. The on-site agriculture is certified organic, meaning that trees on-site are grown without the use of conventional pesticides, artificial fertilizers, human waste, or sewage sludge, and that the produce is processed without ionizing radiation or food additives. While operations are currently organic, there is no guarantee that they would continue with such, regardless of the proposed project.

Important Farmland Mapping Categories

As previously noted, approximately 27.6 acres (30 percent) of this site is classified by the state of California as Farmland of Statewide Importance. This is due to the presence of 27.6 acres of PeC soils on the project site.

Site Characteristics

Soil Types

There are eight soil types found on the project site: (1) Vista coarse sandy loam (VsE), 15 to 30 percent slopes, (2) Vista coarse sandy loam (VsD), 9 to 15 percent slopes (3) Placentia sandy loam (PeD2), 9 to 15 percent slopes, eroded, (4) Fallbrook sandy loam (FaD2), 9 to 15 percent slopes, eroded, (5) Steep gullied land (StG), (6) Cieneba coarse sandy loam (C1D2), 5 to 15 percent slopes, eroded, (7) Fallbrook-Vista sandy loams (FvD), 9 to 15 percent slopes, and (8) Placentia sandy loam (PeC), 2 to 9 percent slopes. Soil fertility ranges low to medium, with geographic slope from 5 to 30 percent slope (USDA Soil Survey, 1970).

Surrounding Agricultural Resources

The Bonsall area consists primarily of rural residential lots and agricultural land uses. The areas surrounding the project site exhibits a pattern of successful small agricultural operations in combination with rural residential development. The area has successfully grown a variety of agricultural products for many years on smaller parcels combined with residential uses.

The successful pattern of agricultural production on large lots characteristic of the study area is typical of the overall pattern throughout San Diego County. As of 2008, the San Diego County Crop Report noted that approximately 63 percent of San Diego County farms are 1 to 9 acres with 77 percent of County of San Diego farmers living on their land. The study area exhibits a similar pattern of successful agricultural operations on small parcels combined with rural residential uses.

2.2.2 Analysis of Project Effects and Determination as to Significance

Guidelines for the Determination of Significance

An affirmative response to or confirmation the following guidelines will generally be considered a significant impact to Agricultural Resources as a result of project implementation, in the absence of scientific evidence to the contrary:

1. The project site has important agricultural resources as defined by the Local Agricultural Resource Assessment (Lara) Model; and the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of agricultural use on the site.
2. Proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act Contract (Contract) and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
3. Proposes a school, church, day care or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under 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.

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4. Involves other changes to the existing environment, which due to their location or nature, could result in the conversion of off-site agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act Contract.
5. The project conflicts with a Contract or the provisions of the California Land Conservation Act of 1965 (Williamson Act).

Rationale for Selection of Guidelines

These analysis guidelines are consistent with the *County of San Diego Guidelines for Determining Significance* and the *Report Format Requirements for Agricultural Resources* (March 19, 2007) and also address the thresholds in State *CEQA Guidelines* Appendix G.

Analysis (Guideline 1 - On-Site Agricultural Resources)

The analysis for Guideline 1 considers the results of the Lara model run, the conversion of agricultural resources that meet specific soils criteria and whether the conversion of such lands would impair the ongoing viability of the site for agriculture. The analysis section details the results of the Lara model run, discusses the soil on the site that would meet the required criteria and then evaluates whether the project substantially impairs the on-going viability of agricultural uses on-site.

Lara Model Results

The Lara Model takes into account six factors, including water, climate, soil quality, surrounding land uses, land use consistency, and slope, in determining the importance of agricultural resources. Each noted factor receives a rating of high, moderate or low importance based on site-specific information. The Lara Model rated the site as high for all categories with the exception of soil quality, which received a moderate rating. Detail on the rating for each category is provided below:

Water: The project site currently receives water from two sources: the Rainbow Municipal Water District (RMWD) and on-site wells. An existing RMWD pipeline provides service to the site. There are five existing wells on the project site that have been used to provide water for the ongoing agricultural operations (Figure 3.1.8-1). Four of these wells (future Lots 2, 5, 15 and 16) have been in operation for a number of years and a fifth well (future Lot 4) has recently been brought into operation. Well records for the four wells indicate they have consistently produced 161 acre-feet of water over the four-year period from January 2005 through the end of December 2008. All five of these wells will be in an easement and operated for the agricultural uses of the project site by the land owners/applicant or by the Home Owners' Association (HOA), if in force. The well water will be used, first, to provide water for the proposed 22.6-acre Agricultural Open Space easement on-site. Water from the five wells beyond that needed for the Agricultural Open Space easement will be used as a source of water for agricultural areas retained on-site outside the easement. The Agricultural Open Space Maintenance Agreement between the County and the land owners/applicant described in Page 2.2-17 of the EIR includes requirements that the wells be used first to water the 22.6-acre Agricultural Open Space Easement and then for other agricultural uses on site. It is contemplated that the Covenants, Conditions and Restrictions (CC&Rs) for the project, if in force, would also include requirements that wells be used first to water the 22.6-acre Agricultural Open Space Easement and then for other agricultural uses on site. Water from the RMWD will be used for the home sites and for the portion of the 35.9 acres of agricultural uses outside of the Agricultural Open Space easement not served by the five wells.

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Climate: The site is located in Zone 23, which translates to a high Lara model climate rating. Zone 23 is rated highly because this climate zone is the most favorable for growing some of the County's most productive crops. Zone 23 is also favorable due to its favorable location close to urban areas and transportation infrastructure which facilitate product delivery to market.

Soil Quality: The Lara model's soil quality rating for the site is moderate. The site has a Soil Quality Matrix score of 0.30; which is below the threshold of 0.33. However, 19.7 acres of the 27.6 total acres of onsite Statewide Importance Soils are contiguous, which is above the threshold of ten contiguous acres.

Surrounding Land Uses: The site has a high Surrounding Land Use rating based on the Lara model. The percentage of land within the Zone of Influence (ZOI) that is compatible with agriculture is greater than 50 percent, resulting in the site's high rating. Consideration of surrounding land uses with the ZOI is intended to provide a comparable measurement of the long term sustainability of agriculture on the project site.

Land Use Consistency: The site's land use consistency rating is high. The project's median parcel size of 3.3 acres is consistent with the median parcel size within the project's ZOI, which is approximately 3.7 acres. A site surrounded by larger parcels usually indicates that the area in which the site is located has not already been significantly urbanized, therefore indicating that the area is more likely to continue to support viable agricultural uses.

Topography: The site's slope rating is high. Using the soil survey criteria, average slope that is available for agricultural use on the site is less than 15 percent. The majority of the site (90 percent) consists of soil types with 2 to 15 percent slopes. Six percent of the site consists of a soil type with 15 to 30 percent slopes, and four percent is made up of steep gullied land.

Two required factors (climate and water ratings) are high and one required factor (soil quality) is moderate, while the complementary factors are rated as high. Based on these determinations, the site is an important agricultural resource as interpreted by the Lara model.

Soil

The project site contains 27.6 acres of Statewide Significance Soils (PeC soils). The project will result in the conversion of approximately 6.0 acres of these soils for roads, driveways, building pads, and leach fields as shown in Figure 2.2-1. Of the remaining 21.6 acres (78 percent) of these PeC soils, 13.8 acres (64 percent) will be retained for ongoing and future on-site agricultural operations in 22.6 acres of an Agricultural Open Space easement. An additional 7.8 acres of PeC soils will remain outside of the proposed Agricultural Open Space easement. The loss of 6.0 acres of Statewide Significance Soils, which is also mapped as Farmland of Statewide Importance, is considered significant.

- **Impact AG-1: Impact to Farmland of Statewide Importance** – The project results in the conversion of 6.0 acres of PeC soils, which are characterized as Statewide Significance Soils and mapped as Farmland of Statewide Significance per the FMMP.

Ongoing Viability of Agricultural Uses

The project design allows for the continuing viability of agricultural uses on-site. As a result, 58.5 acres of existing agricultural uses will not be disturbed as part of the project grading and construction. This represents approximately 64 percent of the 90.9 acres of agricultural uses currently on-site. Mitigation

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measures proposed for the project include the creation of a 22.6-acre Agricultural Open Space easement on-site that will preserve both agricultural uses and soils within this area. The Agricultural Open Space easement includes the preservation of 13.8 acres of PeC soils designated as Statewide Importance Soils on-site. This results in preservation to impact ratio of 2.3:1 of this significant resource. In addition to the 22.6 acres of land preserved within the Agricultural Open Space easement, an additional 35.9 acres will be not be disturbed due to project grading or construction. This 35.9-acre area contains agriculture. While there is no guarantee that future owners will retain this agriculture on-site, the project includes several features which will encourage the continuation of agriculture on the 35.9 acres outside of the Agricultural Open Space easement. This includes maintenance of in-place grove irrigation which will be retained, and the record of estate residential and agricultural activities successfully occurring together on large-lot subdivisions throughout San Diego County.

The required mitigation for impacts to agricultural resources that meet the soil quality criteria for Prime Farmland and Farmlands of Statewide Importance is addressed in the County Guidelines for *Determining Significance and Report Format and Content Requirements for Agricultural Resources* adopted March 19, 2007 (the "Guidelines"). The Guidelines specify a mitigation ratio of 1:1 for impacts to soils meeting the quality criteria for Prime Farmland and Farmlands of Statewide Importance. The on-site 22.6-acre Agricultural Open Space easement proposed as part of the project exceeds this mitigation requirement by preserving 13.8 acres of PeC soils, resulting in a preservation-to-impact ratio of 2.3:1, substantially exceeding the required mitigation ratio of 1:1 contained in the Guidelines. Uses within the easement shall be restricted to those activities that support agriculture. Any area within the Agricultural Open Space easement that has PeC soils and is disturbed as a result of septic or leach line construction will be backfilled with those PeC soils to sustain continuity of important soils that will support continued agricultural production. The preservation of 22.6 acres of agriculture within the Agricultural Open Space easement ensures the ongoing viability of agricultural uses as part of the project. The proposed lot sizes, ranging from 2.1 to 5.9 acres in size, are also consistent with the mixed agricultural and rural residential uses that exist in the surrounding area. Therefore, the project with mitigation incorporated would have less than significant impacts to the viability of the onsite agricultural resources.

Analysis (Guidelines 2-4 - Off-site Agricultural Conversion)

The project proposes a mixture of land uses consisting of 28 home sites on lots ranging in size from 2.1 to 5.9 acres with up to 64 percent of existing agricultural uses remaining on-site (22.6 acres within the Agricultural Open Space easement and another 35.9 acres which will not be impacted by project construction and may continue under agricultural production). This use is consistent with the existing rural residential and agricultural uses predominant in the study area. Approximately 645 acres of the study area consist of these rural uses which accounts for approximately 89 percent of the land uses within the ZOI being lots with agricultural uses. Agricultural uses in the study area consist predominantly of avocado and citrus products similar to the agricultural uses that would be retained on the project site. Thus the project proposes a pattern of development (estate residential with small-scale agricultural production) that is similar to the surrounding area and would not result in any conflicts.

Agricultural Open Space Easement and Buffers

The 22.6-acres Agricultural Open Space easement will be required as project mitigation which will provide a natural buffer between rural residential uses on-site and agricultural operations off-site. The Agricultural Open Space easement includes extensive buffers located along the northern and southern boundaries of the western parcel, thereby avoiding potential interface conflicts between the proposed project and adjoining agricultural uses. These areas are shown on Figure 2.2-1.

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Aqueduct Road separates the project site from agricultural uses to the east, and Via Ararat Drive separates the site from agricultural uses to the west. Grading for the lots and road infrastructure has been focused in the interior of the project site to minimize off-site impacts to agricultural uses. Grading is restricted to pads and roads to preserve existing orchards and to integrate with the successful pattern of mixed agricultural and rural residential uses in the surrounding area. Accordingly, land use conflicts between the proposed project and agricultural operations in the surrounding area are not expected to occur.

Estate-sized lots are proposed ranging in size from 2.1 acres to 5.9 acres, allowing each lot to retain avocado and citrus trees around pads, thereby providing a buffer between on-site residential uses and off-site agricultural uses. Further, orchard crops such as avocados and citrus are compatible with residential uses on smaller lots. These orchards typically have fewer compatibility issues than other types of agricultural operations due to lower chemical treatments, less farm worker presence, less truck traffic, and fewer odors.

Roads will be constructed on-site to provide access to West Lilac Road, a publicly-maintained road, through Aqueduct Road and Via Ararat Drive. This will ensure that existing roads in the area used for agricultural purposes are not impacted by the project's traffic. Residential traffic from the project will utilize Via Ararat Drive and Aqueduct Road which will not result in any impacts to existing agricultural uses in the project area. Aqueduct Road, which separates the project site from agricultural uses to the east, and Via Ararat Drive, which separates the site from agricultural uses to the west, further buffers the project from off-site agricultural uses. For all these reasons, the project will not conflict with existing agricultural uses in the surrounding area and impacts would be less than significant.

On-Site Organic Production

Agricultural operations on-site have been certified organic since 2003, thus avoiding use of pesticides and fertilizers that have the potential to impact off-site uses. Furthermore, pesticide permit safety requirements, administered through the County of San Diego Department of Agriculture, Weights and Measures (SDAWM), monitor and control use of pesticides and to avoid impact to off-site uses. The site has been registered with SDAWM, which has verified the organic nature of the existing operation. Therefore impacts to off-site uses caused by the possible future use of pesticides are minimized. While there is no guarantee that the project site will continue as an organic operation, should pesticides be used in the future on the project site, they would be required to adhere to the pesticide permit requirements, as detailed above, which would reduce pesticide impacts to on and off-site residents to less than significant.

On July 28, 2008, Geocon Consultants completed a soil sampling and analytical testing for pesticides on the project site. No pesticides were detected at or greater than the method reporting limit in any of the samples taken. Therefore, past pesticide use on the site does not have the potential to impact off-site agricultural operations.

The project does not include a school, a church, a daycare or other use that involves the concentration of people at certain times within one mile of existing agricultural operations in the study area. There are no lands within the 727-acre ZOI under a Williamson Act Contract or Agricultural Preserve. The project does not propose any amendments to the County General Plan, or zoning ordinance or the Bonsall Community Plan capable of resulting in the conversion of off-site agricultural resources to a non-agricultural use and the project does not include any off-site infrastructure that has the potential to adversely impact neighboring agricultural uses.

Off-Site Organic Production

Organic farming is being carried out on a 14.3-acre residential property south of the project known as the Gubler property (APN 127-29-33). This property is adjacent to proposed Lots 23 and 24 of the proposed project. Project design features and proposed mitigation will reduce potential impacts to the farming being conducted on the Gubler property to a less than significant level. Potential impacts have been minimized through a combination of buffering, similarity of uses, and professional agricultural management that is proposed as part of the project design or as mitigation. Most of the shared boundary between the proposed project and the Gubler property is buffered. The entire shared boundary with Lot 24 is buffered by a 0.7-acre Agricultural Open Space easement. A one-acre Agricultural Open Space easement area on Lot 23 is adjacent to the northwest corner of the Gubler property. Agriculture will continue in these areas as it has in the past, so no interface issues are expected to occur.

Additionally, a review of the Federal Organic Foods Production Act of 1990 and the California Organics Products Act of 2003 indicates that organic certification is not dependent on the nature of uses adjacent to the applicant's land. The Federal Organic Food Production Act of 1990 (7 U.S.C. Code §§6501 et seq.) specifies the requirements for organic food production in the United States. Section 6504 states that to be sold or labeled as an organically produced agricultural product, an agricultural product shall have been produced and handled without the use of synthetic chemicals, not be produced on land to which any prohibited substances including synthetic chemicals have been applied during the three years immediately preceding the harvest of the agricultural products, and be produced and handled in compliance with an organic plan agreed to by the producer and the certifying agent. Section 6513 governing the required organic plan requires the plan to contain provisions designed to foster soil fertility, regulate the application of manure to crops, and prohibits raw manure from being applied to any crop in a way that significantly contributes to water contamination by nitrates or bacteria. None of these organic requirements are predicated upon off-site uses.

The California Organic Products Act of 2003 (Food & Agriculture Code §§46000 et seq.) enforces regulations adopted by the National Organic Program (Food & Agricultural Code §46000(b)). The certification requirements under the California Organic Products Act are the same as the Federal Organic Foods Production Act of 1990 (Food & Agriculture Code §46001). Similar to the Federal Organic Foods Production Act of 1990, the California Organic Products Act of 2003 contains no organic certification requirements tied to off-site uses. In both cases, certification requires evidence the agricultural products have been produced without the use of synthetic chemicals, have not been produced on land to which any prohibited substances, including synthetic chemicals have been applied during the prior three years and be produced and handled in compliance with an organic plan. The thrust of both statutes is to ensure that certified organic products do not contain synthetic chemicals or raw manure. Additionally, Mr. Jerome Stehly has been managing agricultural operations for a number of years throughout San Diego County, as well as in the area within and surrounding the project site. Mr. Stehly also acts as the agricultural manager for a number of certified organic operations in San Diego County. It is his experienced opinion that no problems involving organic permitting, adjacent to two-acre residential lots, have been documented (Stehly Communication, March 2010). Additionally, Dawn Nielsen of SDAWM was contacted on May 27, 2010 about reports of issues between residences and organic farms. She reported there were no known complaints against organic farms in the area. Therefore the proposed project will not impact the organic farm to the south. This is due to the proposed project's design features and the proposed mitigation, to alleviate impacts to the on-site agricultural resources. These previously stated project design and mitigation measures reduce the potential off-site impacts, to less than significant. Mitigation in the form of an Agricultural Open Space easement and the Agricultural Open Space Maintenance Agreement between the County and applicant will minimize potential conflicts with off-site organic production by

ensuring that the project operates well-managed agricultural farms continuing into the future. Therefore, project impacts to off-site organic agricultural production will be less than significant.

In summary, the proposed project does not result in land use conflicts with agricultural lands in the vicinity because it is physically separated from existing agricultural uses and agricultural buffers have been provided as part of the 22.6-acre Agricultural Open Space easement areas on-site. The project would not result in off-site conversion of agricultural operations, including adjacent organic agricultural activities. The project would not produce a concentration of people because it does not propose a use such as a church or school which could be impacted by off-site agricultural operations. Furthermore, the project does not propose other changes to the existing environment which could result in the conversion of off-site agricultural resources to a non-agricultural use. The proposed project is consistent with existing mixed of estate residential and agricultural densities in the surrounding area; therefore, no significant indirect impacts will occur. Due to the project's design, compatibility of use, and mitigation proposed, potential impacts related to off-site agricultural conversion are reduced to less than significant. Any potential significance will be mitigated with Impact AG-1 which maintains agriculture on the project site and provides for its long-term management. No further mitigation is required.

Analysis (Guideline 5 - Williamson Act Land Conversion)

There are no lands within the 727-acre ZOI under a Williamson Act Contract or Agricultural Preserve, nor is the project site under a Williamson Act Contract or preserve. Therefore, no impact is identified for this issue area.

2.2.3 Cumulative Impact Analysis

The cumulative projects study area consists of an irregularly-shaped area centered on the San Luis Rey River Valley between the unincorporated town of Bonsall on the west and Interstate 15 (I-15) freeway on the east. It was chosen based on a combination of topography, adjacency to I-15, and its location within the Bonsall Community Planning Area. It covers an area of approximately 8,000 acres (12.5 square miles). There are approximately 787 acres of Prime Farmland or Farmland of Statewide Importance in the area. The hills north and south of the San Luis Rey River are the approximate northern and southern boundaries. These physical barriers were chosen because they generally mark a change in the agricultural character of the land. North of the San Luis Rey River, terrain is hilly, and the development is sparser. Agricultural operations are widely scattered and undisturbed natural habitats predominate. To the south, hilly terrain also results in a reduction in residential and agricultural uses. Some estate lots with potential agricultural areas exist in the foothill area and were included in the study area.

The unincorporated town of Bonsall at the intersection of South Mission Road and SR-76 was used to define the western boundary. Beyond this area lay the community of Vista with more intensive development patterns. I-15 and the Bonsall/Valley Center Community Plan Boundary were used as the eastern boundary. I-15 creates a north to south physical barrier as it crosses the San Luis Rey River valley. Projects outside the study area were also analyzed in response to public comments. This includes the 957-acre Lilac Ranch, located in Valley Center approximately three miles east of the project on the east side of I-15. The study area is shown in Figure 2.2-2.

The agricultural resources cumulative analysis incorporated several steps. A County map showing projects in the study area was obtained. In addition, a written list of projects to be reviewed for relevance in regard to the project's cumulative effects. This list of possible projects was reviewed and projects on the list that fell within the study area were examined. A total of 41 projects were determined to require

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analysis. All projects were screened using criteria in the County of San Diego *Guidelines for Determining Significance, Agricultural Resources* (March 19, 2007). Of those 41 projects, 26 were determined to not substantially impair the viability of surrounding agriculture, as determined in the guidelines mentioned above. These are listed in Table 2.2-2 and discussed in further detail later in this section.

The remaining 15 projects were researched using available County records to determine the extent of agricultural impacts (Table 2.2-3). Tentative Map (TM) 5079, the San Luis Rey Ranch project, was eliminated from the cumulative list since it was subdivided in November 1995, 15 years ago, and is now classified as an urban or built-up area on the FMMP map. In addition, a current aerial photograph of the area indicates that 24 of the 29 lots that were previously subdivided (approximately 83 percent) still contain active groves. In cases where acreages were not listed in the County files for pre- and post-development agriculture, those acreages were estimated by adding together the pad and road quantities labeled on grading plans.

Projects That Would Not Substantially Impair Ongoing Viability of Agriculture

Projects that were determined to not substantially impair the ongoing viability of agricultural use are summarized in Table 2.2-2. These projects may or may not have existing agriculture but generally avoid impacts to FMMP-mapped resources. Examples of these projects include minor expansions or alterations of an existing use, single family residence grading permits, boundary adjustments and Certificates of Compliance, agricultural intensification, accessory or auxiliary uses such as wireless telecommunication facilities and drainage facilities, road improvements and other minor public facility improvements, and any project, including residential subdivisions. Projects that have been withdrawn are also included in this list of projects.

Minor Use Permits (ZAP) 70-139, 03-113, 99-021, 01-048, 02-022, 03-097, 04-035, and 06-090 are all wireless facilities that would not substantially impair the ongoing viability of the surrounding sites for agricultural use because they are accessory uses that cover a very small area. Administrative Permits (AD) 07-010 (oversize barn) and AD 02-042 do not have existing agricultural activities on-site, contain no soils of importance, and are minor expansions of an existing use. TM 5387 and Major Use Permit (MUP) 02-042 propose condominiums in already developed areas. Permit numbers 98-0206, 05-0019, 99-0105, 05-0087, 01-0056, and 98-0049 are boundary adjustments that would not substantially impair the ongoing viability of the surrounding sites for agricultural use because they do not prevent the underlying land from being used for agriculture. MUP 04-016 is an expansion of the existing Dai Dang Meditation Center. There are no existing agricultural uses or soils of importance on the site. ZAP 04-019 is a minor expansion of an existing use consisting of a second dwelling unit with no existing agricultural uses or soils of importance on-site. MUPs 70-212-02 and 92-019-02 are minor alterations of existing uses that would not substantially impair the ongoing viability of the surrounding sites for agricultural use. TM 4956, Tentative Parcel Map (TPM) 20619, AD 05-038, and MUP 05-055 have all been withdrawn. Projects that would not substantially impair the ongoing viability of agriculture are listed in Table 2.2-2.

Cumulative Projects With Existing Farmlands of Statewide Importance or Prime Farmlands

Fifteen remaining projects were analyzed for cumulative direct impacts to agricultural resources. Table 2.2-3 summarizes data for each of these projects. It shows the estimated impact to Prime Farmland, or Farmland of Statewide Importance is 9.0 acres. Inclusion of project impacts to 6.0 acres of Farmland of Statewide Importance results in a total impact to important farmland of 15.0 acres. This impact compares to overall acreage of these categories of 787 acres within the initial 8,000 acres studied. This is 1.9 percent of the total designated farmland in the study area and is not cumulatively significant, since

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772 acres of Prime Farmland or Farmland of Statewide Importance remain within the 8,000-acre study area. The Lilac Ranch site located three miles from the project site in Valley Center has no Prime Farmland or Farmland of Statewide Importance.

Cumulative Projects With Existing Agricultural Resources

Within the initial 8,000-acre study area, total impacts to agricultural resources from all planned projects, including the project area total of 85.3 acres. This represents slightly more than one percent of the 8,000-acre study area and is not cumulatively significant. The Lilac Ranch project impacts 273 acres, most of which is grazing land. It is located too far from the project and other projects within the 8,000-acre study area to create any cumulative significant agricultural impacts. Each project is discussed below.

MUP 72-618, Rawhide Ranch, is for one building (approximately 750 square feet in size) on a 37-acre ranch which may impact less than an acre of Farmland of Statewide Importance. This resource is located in the east central area of the parcel. No direct or indirect impacts are anticipated because there is no active agriculture on-site.

TM 5410, Marquart Ranch, is an approved subdivision on 44 acres and is located approximately 1.5 miles from the project site, east of I-15. This project does not have Prime Farmland and/or Farmland of Statewide Importance on-site; however, it does have an existing avocado grove. There are minimal direct impacts (an estimated nine acres of grove) and no cumulative impacts identified in the County's file as a result of the Marquart Ranch project.

TM 5346, Dabbs, proposes to subdivide 38.4 acres into nine residential parcels of at least four acres in size each. It currently supports a planter nursery. There is no current plan to build houses on the site; however, plans will be required to conform to San Diego County requirements. Proposed parcel sizes of four acres each are adequate to support agricultural uses on the site. The project will directly impact an estimated 10 acres of Prime agriculture, including approximately 2.0 acres of Prime Farmland or Farmland of Statewide Importance. No indirect impacts are anticipated because it is similar to existing residential/agricultural use in the area where these uses co-exist.

MUP 94-025 is a 28-acre parcel proposing a 5-acre retreat within an undeveloped area of an existing grove. The grove remains intact and the retreat will not be located on important farmland. No direct or indirect impacts are anticipated because the grove will be retained and the project is consistent with agricultural and residential mixed uses in the surrounding area.

TPM 20763, McNulty, is a minor subdivision approved in June 2004. The McNulty project will divide a 4.8-acre parcel into two lots; one 2.4 acres and the other 2.4 acres. Active agriculture on-site consists of deciduous fruits and nuts. This project directly impacts less than one acre of important farmland. No potential indirect impacts are expected because orchards and vineyards remain viable and the project is consistent with agricultural and residential mixed uses in the surrounding area.

TPM 20830, Hukari, is a subdivision of 30 acres into four lots plus a remainder lot. There is an existing avocado orchard on-site (approximately 28 acres) and it is estimated that approximately seven acres of avocados will be directly impacted by the project, but these trees are not on Prime Farmland or Farmland of Statewide Importance. It is expected that the orchard will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area.

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TPM 20799, Stehly (Camino Quieto), is a subdivision of 11.7 acres into four parcels in an existing avocado and citrus grove. A minimum of two acres of grove will remain on each parcel. Less than four acres of the existing grove will be directly impacted by the project. There is no Prime Farmland or Farmland of Statewide Importance on the site. It is expected that the orchard will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area.

TPM 20319, Nira Kohl, is a subdivision of 17 acres into four lots and a remainder parcel. There is an existing avocado grove on the site. The estimated impact to agricultural uses is five acres. The agricultural analysis determined that direct and indirect agricultural impacts are less than significant because the project is consistent with agricultural and residential mixed uses in the surrounding area.

TPM 20541, Woodhead, is a subdivision of 12.5 acres into four lots plus one remainder parcel. An existing avocado grove will be directly impacted. As detailed in the County file for this project, approximately 150 trees total will be removed as a result of the project, leaving about 200 trees per lot. There is no Prime Farmland or Farmland of Statewide Importance on the site. The grove will remain viable and indirect impacts were determined to be less than significant because the project is consistent with agricultural and residential mixed uses in the surrounding area.

TM 5492, Brisa del Mar, proposes a residential subdivision of 206 acres into 27 two-acre minimum lots. Two residences and a developed horse arena currently exist on the site. Most of the site is undeveloped. The area south of the horse arena and north of Camino del Rey Road is classified as Farmland of Local Importance and is proposed as dedicated open space. There is no active agriculture but there are prime and state significance soils on the site.

TPM 20845, Sanders, has been approved for the subdivision of 12 acres into four lots and a remainder parcel. This project directly impacts approximately four acres of greenhouse and/or truck crops on the site, 2.5 acres of which are Unique Farmland. There is no Prime Farmland or Farmland of Statewide Importance on the site. It is expected that the agricultural resources will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area.

TPM 21016, Pfaff, proposes a minor subdivision of 7.8 acres into two single family residences. The avocado grove on-site is to remain on both parcels, and the existing agricultural use that is located within the proposed biological open space will be allowed to continue. There is no Prime Farmland or Farmland of Statewide Importance on the site. The Unique Farmland on the site is expected to remain viable because the proposed lots are over two acres in size and agriculture will not be impacted by grading.

TPM 20727, Dressen, is a subdivision of 11.9 acres into two lots. The majority of the site consists of citrus and avocado grove, approximately two acres of which will be directly impacted. There is no Prime Farmland or Farmland of Statewide Importance on the site. This project was determined to not have significant adverse project or cumulative agricultural impacts. It is expected that the groves will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area.

Site Plan 99-043, Miller Residence, is a 4.9-acre parcel that proposes a remodeled manufactured single family dwelling within an existing protea flower grove. Construction of the house will impact less than one acre of existing agricultural use and agricultural uses will continue.

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TM 5385, Lilac Ranch, although not located within the study area, was analyzed for cumulative agricultural impacts as a result of public comments on the project. Lilac Ranch is a 949-acre site proposing 354 single-family dwellings and is located within the Valley Center Community Planning Area approximately three miles east of the proposed project, and east of I-15. No Prime Farmland or Farmland of Statewide Importance occurs on the site. The site has been used largely for cattle grazing (approximately 909 acres total). Although the large majority of this project site is used as a cattle ranch and not for agricultural production, approximately 273 acres are impacted by proposed development. An 11-acre agricultural preserve is proposed. Approximately 5.5 acres of abandoned avocado and 2.3 acres of active avocado orchard are present on the site. The project's agricultural impacts appear to be less than significant. Because Lilac Ranch is located three miles east of the project in Valley Center and is primarily composed of dry cattle farming, it does not add to potential cumulative agricultural impacts of the project's kind or in the project's location. It is more properly analyzed as part of agricultural losses or gains within the San Diego region which is done by the County on an annual basis.

The Accretive Plan Amendment (PAA09-007) was submitted on November 2, 2009 requesting permission to process a general plan amendment and specific plan for a master planned community in the Valley Center Community Planning Area. The plan consisted of a maximum of 1,746 dwelling units, a school, a neighborhood-serving commercial village center with retail uses and an active park on 416 acres. This PAA request was approved by the Planning Commission on December 17, 2010. As proposed, the project would require approval of an amendment to the County General Plan and approval of a specific plan and a tentative and final subdivision map. The action makes no judgment on the project, but simply clears the way for it to be considered by the County. The project would still require public hearings, environmental review and eventually consideration and approval by the County Board of Supervisors. At this juncture, a project application has not been submitted to the County of San Diego on the Accretive project and environmental review has not commenced.

CEQA Guidelines Section 15130(b)(1) requires that the cumulative analysis in an EIR include past, present, and probable future projects. Since the Accretive project is not a probable future project, an evaluation of its cumulative agricultural impacts is not required.

Any detailed environmental analysis of agricultural impacts associated with the Accretive project is highly speculative at this time due to the lack of any specificity about the number of residential units that will ultimately be proposed, the square footage and nature of any commercial uses, on-site and off-site road and infrastructure improvements, the lack of any information on the planned school or park areas and the lack of any clearly articulated development envelope for the planned future uses.

However a good faith effort has been made to evaluate the project given the limited information currently available to determine if it would alter the cumulative agricultural impact analysis. It is located approximately 3,000 feet east of I-15 with the northern portion of the project transecting West Lilac Road in Valley Center. The project is located approximately one mile east of the project site in the Valley Center Community Planning Area and is separated from the project site by both Old Highway 395 and I-15. The lack of any information in the PAA on areas of the Accretive project that would actually be developed, as well as those on-site agricultural uses and resources that would be preserved, prevents any feasible analysis of its potential agricultural impacts at this time. A review of agricultural maps of the site indicates there is no Prime Farmland on the site. There is approximately 3.5 acres of Farmland of Statewide Importance on the Accretive site located near the southeastern boundary. The conceptual site plan provided as part of the PAA presently shows an open space corridor extending along the southern boundary of the project site and does not show development near the southeast boundary where the Farmland of Statewide Importance exists. However, until a specific development is submitted for the

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Accretive project, it cannot be determined if impacts to agricultural resources or to Farmland of Statewide Importance are significant.

Cumulative Analysis for Prime Farmland Soils and Statewide Significance Soils

Under the County Guidelines for Determining Significance of Agricultural Resources, a significant direct impact to agricultural resources occurs if a project results in the conversion of agricultural resources that meet soil quality criteria for Prime Farmland or Farmland of Statewide Importance and as a result a project would substantially impair the ongoing viability of the site for agricultural use. Twelve of the fifteen projects studied in the cumulative project analysis do not result in impacts to Prime Farmland or Farmland of Statewide Importance. The Rawhide Ranch project (MUP 72-618) results in an impact to less than one acre of Prime Farmland or Farmland of Statewide Importance, the Dabbs project (TM 5346) results in an impact of two acres, and the McNulty project (TPM 20763) impacts less than one acre. The project has direct impacts to 6.0 acres of important soils. Collectively, the project in combination with other anticipated development in the area results in the total loss of 10 acres of Prime Farmland or Farmland of Statewide Importance within the 8,000-acre area that was studied. This includes 787 acres of Prime Farmland or Farmland of Statewide Importance. This represents approximately 1.2 percent, and a less than significant amount, of important farmland soils within the study area. This is not a cumulatively significant impact to agricultural resources, since 777 acres (98.7%) of Prime Farmland or Farmland of Statewide Importance remain within the study area and the cumulative impact would not impair the ongoing viability of the site or the region for agricultural use.

Agricultural impacts to Prime Farmland Soils or Statewide Significance Soils caused by the Accretive Project as ultimately proposed are not known to be significant or not. However, they must be mitigated as specified in the *County of San Diego Guidelines for Determining Significance of Agricultural Resources*. These Agricultural Guidelines mandate an agricultural report evaluating agricultural impacts both directly, indirectly, and cumulatively and require mitigation for any significant agricultural impacts at a ratio of 1:1. Agricultural impacts of the Accretive project are too speculative to include in the cumulative analysis until development envelopes and their impacts on existing agricultural uses and soils are defined. Based upon the limited information available, determining the Accretive project's contribution to cumulative impacts at this time is not possible. If these land use entitlements are permitted by the County at some time in the future, Accretive will be required to mitigate any significant direct or cumulative agricultural impacts as part of the CEQA process.

Cumulative Analysis for Existing Agricultural Resources

For existing agricultural uses, the project, in combination with other anticipated development in the study area, does not result in any cumulatively significant agricultural impacts because the cumulative projects have avoided or minimized agricultural impacts or retained agricultural uses. The project in combination with other anticipated development will result in the total loss of 85.3 acres of agricultural uses consisting of 34.3 acres impacted by the project and 51 acres by the other 15 projects within the project area. This is approximately one percent of agricultural uses within the mostly agricultural 8,000-acre study area.

As explained in the November 2010 TRS agricultural resources technical report (pp. 5-5, 5-6) (EIR Appendix C), Lilac Ranch is not located within the Project's 8,000 acre agricultural study area and approximately 250 acres of the site has been used for cattle grazing. Only 2.3 acres of active avocado orchards are present on the Lilac site, with an 11 acre agricultural preserve proposed as part of this project. In addition, the Lilac Ranch project is located more than 3 miles from the project site in Valley Center. As noted on page 5-7 of the agricultural technical report, this project is located too far from the project site to create any cumulatively significant agricultural impacts. Its impacts being primarily to

2.2 Agricultural Resources

grazing land are also largely to a different sector of agricultural resource than the project's being primarily to fertile soils and crops. Accordingly the Lilac Ranch does not contribute to the project's cumulative agricultural impacts to crops and significant soils.

Aerial photographs for the Accretive project site do indicate that existing agriculture would be impacted by almost any development footprint. There is a high potential for future significant agriculture impacts. However, based upon the limited information available, determining the Accretive project's contribution to cumulative impacts at this time is not possible. If these land use entitlements are permitted by the County at some time in the future, Accretive will be required to mitigate any significant direct or cumulative agricultural impacts as part of the CEQA process.

Regional Cumulative Impacts

To evaluate whether there is a cumulative agricultural impact occurring on a regionwide basis, the 2008 San Diego County Crop Report was examined. The San Diego County Crop Report evaluated land within San Diego County that remained an agricultural operation as of 2008 when compared to 2007. The 2008 San Diego County Crop Report indicated that 312,766 acres of land within San Diego County remained in agricultural operations as of 2008 compared to the 308,991 acres in 2007, an increase of 3,775 acres. Overall, agricultural acreage in San Diego County has increased from 172,262 acres in 1998 to 312,766 agricultural acres in 2008, an increase of 81 percent.

The loss of active agriculture and grazing land within dispersed areas of the region is not cumulatively significant because overall agricultural acreage in San Diego County has increased 81 percent during the ten years between 1998 and 2008. Overall crop values have also increased both recently and historically from \$1.178 billion in 2007 to \$1.552 billion in 2008. This represents an increase of \$374 million in the value of agricultural crops produced within the region from 2007 to 2008.

According to the San Diego County 2008 Crop Statistics and Annual Report, fruit and nut crops make up approximately 15 percent of the value of the County's agricultural commodities, while the highest value crop, nursery and flowers, make up 66 percent of the total agricultural value. In 2008, avocado and citrus crops brought in approximately \$5,079 per acre. This is not a high-value crop when compared to nursery and flower crops in San Diego County, which brought in approximately \$97,722 per acre. Total avocado and citrus value directly impacted in this cumulative study area constitutes 0.1 percent of total avocado and citrus value in San Diego County. This loss is would also be less than considerable when measured against the \$1.552 billion of crop values in San Diego County in 2008.

Cumulative projects will not reduce the number of farms in the region because most projects in the study area opt for retention of a same-lot, residential and agricultural mixed use land use pattern.

According to the United States Department of Agriculture's (USDA) 2007 census of agriculture, the number of farms in San Diego County increased 27 percent between 2002 and 2007 from 5,225 to 6,687. The number of farms in the County continues to increase, despite development of specific parcels, because of the mixed use type of farming common to San Diego County. According to the 2007 San Diego County Crop Statistics and Annual Report, 68 percent of County farms are one to nine acres in size, with the median being four acres; and 92 percent of farms are family-owned, with 77 percent of farmers living on their land. Therefore, it is common for developments on large lots to retain agricultural functions.

This is reflected in the study area, where 13 of the 15 projects are designed in a manner that may retain agricultural uses. These include the project, which creates a 22.6-acre Agricultural Open Space easement,

and it is also expected for 13 of the 15 projects with agriculture that were studied for this report. These are TM 5346 (Dabbs), TM 5410 (Marquart Ranch), MUP 94-025, TPM 20319 (Nira Kohl), TPM 20763 (McNulty Minor Subdivision), TPM 20830 (Hukari), TPM 20799 (Stehly/Camino Quieto), TPM 20541 (Woodhead), TPM 20845 (Sanders), TPM 21016 (Pfaff), TPM 20727 (Dressen), Site Plan 99-043 (Miller Residence), and TM 5385 (Lilac Ranch).

The 2008 San Diego County Crop Report continues to document substantial growth both in land in agricultural production throughout the County and in the value of San Diego County crops. Despite the loss of 10 acres of Prime Farmland or Farmland of Statewide Importance by the project in combination with other projects in the area, region wide agriculture and production in San Diego County has continued to grow substantially. Cumulative impacts from the direct loss of Prime Farmland or Farmland of Statewide Importance are therefore less than significant.

The project does not result in indirect agricultural impacts. The 15 projects examined in detail in this cumulative impact analysis did not result in cumulatively significant indirect impacts because they do not have agriculture or are designed so that agriculture can continue on-site and each of them is consistent with the agricultural and residential mixed uses in the largely agricultural surrounding area. Accordingly, the project, in combination with other anticipated projects in the area does not result in cumulatively significant indirect agricultural impacts.

2.2.4 Significance of Impacts Prior to Mitigation

The proposed project would have a significant impact to agricultural resources. The following mitigation measures would reduce the impact to a less than significant level.

2.2.5 Mitigation

Impact AG-1: Farmland of Statewide Importance

The project results in the conversion of 6.0 acres of PeC soils, which are characterized as Statewide Significance Soils and mapped as Farmland of Statewide Significance per the FMMP.

AG-1 Intent: In order to protect agricultural resources, a 22.6-acre Agricultural Open Space Easement shall be granted over the areas shown on Tentative Map 5276 and Figure 2.2-1 of the EIR.

Description of Requirement: Grant to the County of San Diego by separate document, a 22.6-acre Agricultural Open Space Easement as shown on the Tentative Map. The purpose of the easement is to protect the viability of agricultural uses in the easement area. The easement prohibits all non-agricultural uses, including the construction or placement of any residence, garage, or recreational amenities.

1. The only exceptions to this prohibition are:
 - a. Construction and maintenance of access, wells, and water distribution systems for agricultural purposes,
 - b. Grading or clearing for agricultural purposes,
 - c. Fuel management activities by written order of the Fire Marshal,

- d. Construction and maintenance of approved septic systems,
 - e. Percolation and other tests for septic systems and agricultural purposes, and
 - f. Activities necessary to restore agricultural soils during septic system and other permitted construction.
2. The easement shall require the development and execution of an Agricultural Open Space Maintenance Agreement between the County and applicant. This Agreement may be transferred to individual property owners or the HOA if one is formed. The Maintenance Agreement will address and include:
- a. Construction and maintenance of agricultural fencing and signage to be placed along the easement boundaries, and installed prior to approval of Grading and/or Improvement Plans;
 - b. Signage will be corrosion resistant, a minimum size of six inches by nine inches, spaced 100 feet apart, and attached to fencing not less than three feet in height from the ground surface, stating “County Easement: Agricultural Uses Only (Project Ref: 3100-5276)”;
 - c. Maintenance of wells and water distribution systems for use in the 22.6-acre Agricultural Open Space and then for other agricultural uses on the project site;
 - d. Construction and maintenance of leach field areas (original soils will be restored/replaced during septic system construction); and,
 - e. Evidence that security has been established with an acceptable financial institution for operations listed in (a) through (d), to recover costs over a 10-year period, and to be based on a cost estimate provided by the applicant and approved by the Director of DPLU, prior to approval of the Final Map.

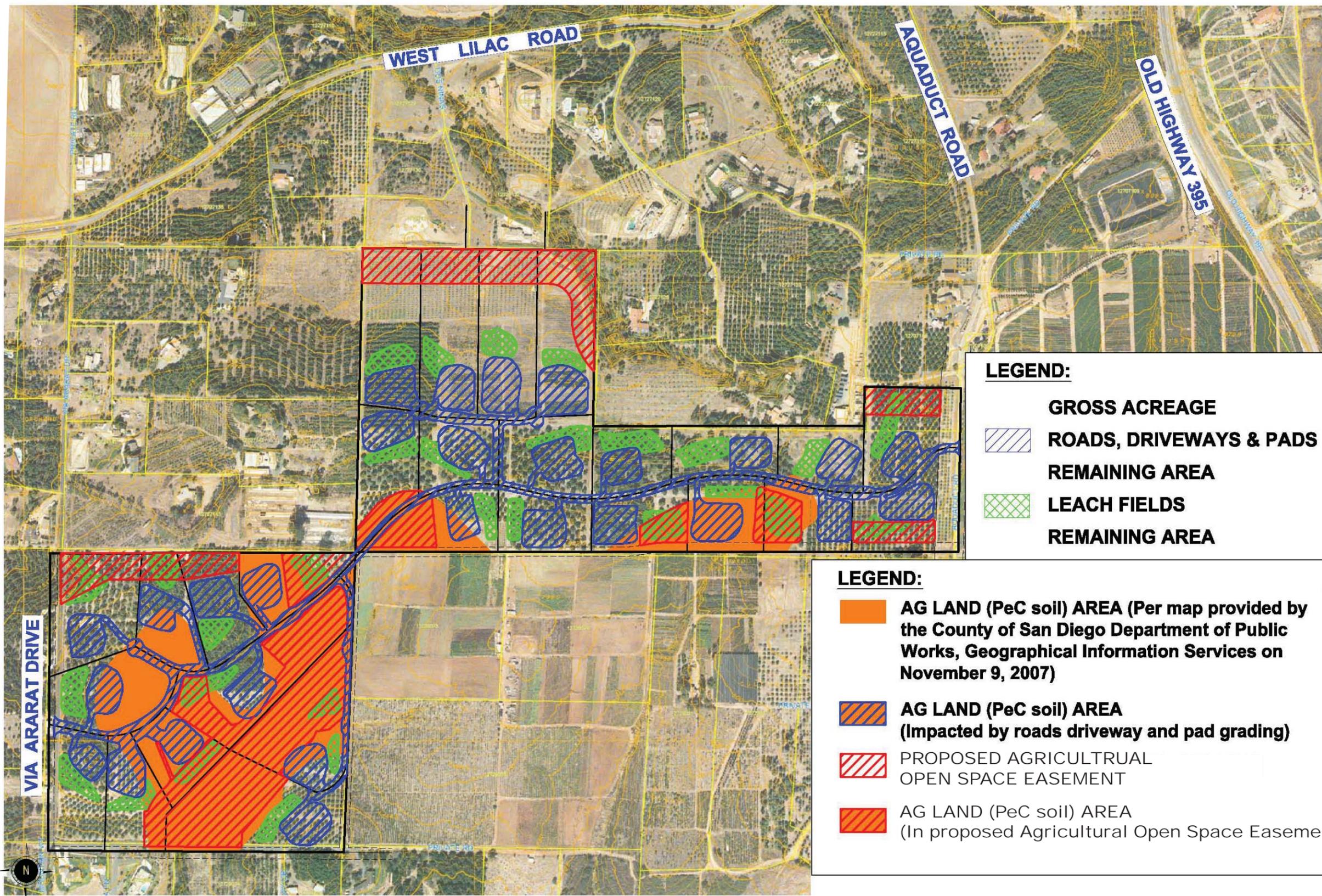
2.2.6 Conclusion

The project will result in a direct impact to 6.0 acres of Farmland of Statewide Importance, which is a significant impact in the absence of mitigation. Implementation of mitigation measure AG-1 will result in the preservation of 22.6 acres of existing agricultural uses on-site in perpetuity within the Agricultural Open Space easement, including the preservation of 13.8 acres of PeC soils.

The required mitigation for impacts to agricultural resources that meet the soil quality criteria for Prime Farmland and Farmlands of Statewide Importance is addressed in the *County’s Guidelines for Determining Significance and Report Format and Content Requirements for Agricultural Resources* adopted March 19, 2007. These guidelines specify a mitigation ratio of 1:1 for impacts to soils meeting the quality criteria for Prime Farmland and Farmlands of Statewide Importance. The on-site the Agricultural Open Space easement proposed as part of the project exceeds this mitigation requirement by preserving 22.6 acres of existing agriculture on-site within the Agricultural Open Space easement resulting in a mitigation ratio of 2.3:1, substantially exceeding the required mitigation ratio of 1:1 contained in the guidelines. The ratio of PeC soils impacted versus preserved is 1.7:1, which also exceeds the County guideline. Additionally, any PeC soils within the Agricultural Open Space easement disturbed by the installation of septic systems will be restored as a requirement of the Agricultural LBZ easement. This mitigation measure complies with the County’s Guidelines for Determining Significance for Agricultural Resources and fully mitigates the project’s agricultural impacts to less than significant.

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Source: TRS Consultant, 9-2009 | G:\Projects\443161_ WestLilac\Subdivision\graphics\docs\Figure2.2-1_AgricultureImpacts.at | Last Updated: 02-02-10



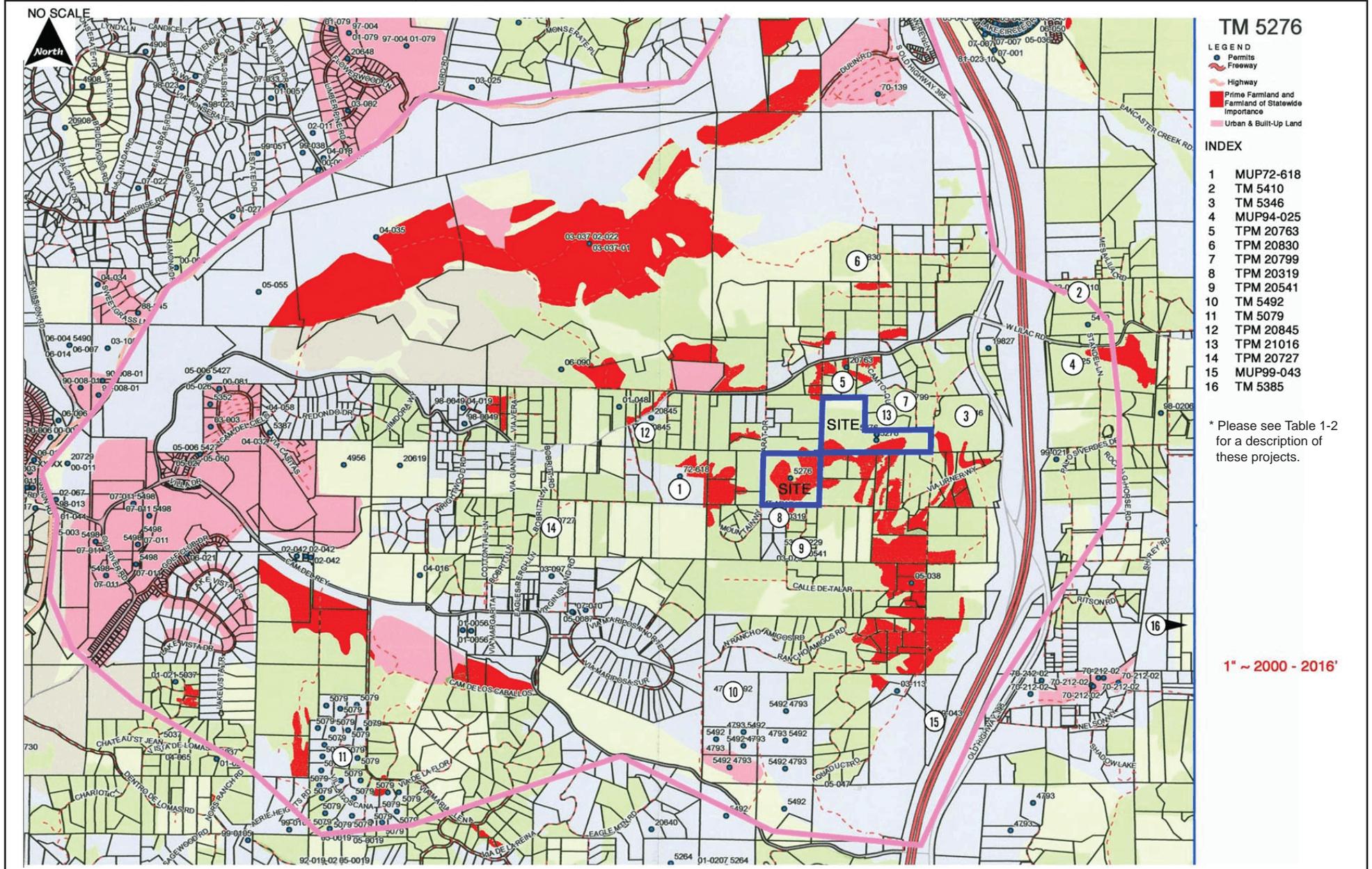
LEGEND:

	AREA (acres)	%
GROSS ACREAGE	92.8	100
 ROADS, DRIVEWAYS & PADS	- 25.2	27
REMAINING AREA	67.6	73
 LEACH FIELDS	- 9.1	10
REMAINING AREA	58.5	63

LEGEND:

 AG LAND (PeC soil) AREA (Per map provided by the County of San Diego Department of Public Works, Geographical Information Services on November 9, 2007)	27.6	30
 AG LAND (PeC soil) AREA (Impacted by roads driveway and pad grading)	6.0	6
 PROPOSED AGRICULTURAL OPEN SPACE EASEMENT	22.6	24
 AG LAND (PeC soil) AREA (In proposed Agricultural Open Space Easement)	13.8	15

0 100 200 300 400 Feet



Cumulative Projects (Agricultural Resources)

FIGURE 2.2-2

**TABLE 2.2-1
Project Consistency with Applicable Goals and Policies (Agricultural Resources)**

Plan	Goal/Policy	Proposed Project Compatibility
Bonsall Community Plan Community Character Goal	Preserve and enhance the rural character of Bonsall through the protection of agriculture, estate lots, ridgelines and the community's natural resources.	The proposed project is consistent with this goal. The project proposes 28 single-family homes with estate parcel sizes ranging from 2.1 acres to 5.9 acres. The project impacts 34.3 acres of the 90.9 acres of existing agricultural uses on-site, and 22.6 acres will be placed in an Agricultural Open Space easement. The project does not impact any ridgelines or natural resources and preserves and enhances the rural character of Bonsall. Therefore, the project is consistent with the Community Character Goal.
Bonsall Community Plan Agricultural Goal	Protect and encourage existing and future agriculture/horticulture as a prominent land use throughout the Bonsall area.	The proposed project is consistent with this policy. The project protects and encourages existing agriculture by preserving 22.6 acres of farmland in perpetuity through the Agricultural Open Space. Additionally, 35.9 acres of agricultural use will not be disturbed during project grading. While this additional 35.9 acres of agriculture will not be placed within the Agricultural Open Space easement, and could be removed by future owners, the project incorporates several features which will encourage the long-term viability of the 35.9 acres. In addition the site will retain existing irrigation, which will facilitate irrigation of the tree crops. Therefore, the project protects existing and future agriculture and is consistent with the Agricultural Goal.
Bonsall Community Plan Agricultural Policy 1	Properties that are in agricultural use and are being proposed for development with estate sized lots should be encouraged to retain agriculture as a compatible use.	The proposed project is consistent with this policy. The project proposes estate sized lots ranging from 2.1 to 5.9 acres in size, which ensures the long term preservation of 22.6 acres of agricultural land in perpetuity. An additional 35.9 acres of agricultural use will not be disturbed during project grading. While this additional 35.9 acres of agriculture will not be placed within the Agricultural Open Space easement, and could be removed by future owners, the project incorporates several features which will encourage the long-term viability of the 35.9 acres. In addition, the site will retain existing irrigation, which will facilitate irrigation of the tree crops. The existing agricultural uses on-site are compatible with the proposed residential development. The project is consistent with Agricultural Policy 1.

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Plan	Goal/Policy	Proposed Project Compatibility
Bonsall Community Plan Agricultural Policy 2	Areas with existing agriculture and areas defined as suitable for agriculture should be considered for the (19) Intensive Agriculture Plan Designation.	The proposed project is consistent with this policy. The project site is designated (19) Intensive Agriculture, and does not propose a change to the designation. The project is consistent with Agricultural Policy 2.
Bonsall Community Plan Conservation Policy 4	Encourage the preservation of agricultural lands.	The proposed project is consistent with this policy. The project protects and encourages existing agriculture by preserving 22.6 acres of farmland in perpetuity through the Agricultural Open Space easement. An additional 35.9 acres of existing agricultural uses outside the Agricultural Open Space easement will not be disturbed by project grading or construction. Ongoing agricultural activity on this additional 35.9 acres will be encouraged through the maintenance of irrigation lines. The project encourages preservation of agricultural lands and is consistent with Conservation Policy 4.
Bonsall Community Plan Soils Goal 2	Preserve Bonsall's significant prime and unique agricultural soils.	The proposed project is consistent with this goal. The project will preserve 13.8 acres of Soils of Statewide Significance within the 22.6-acre Agricultural Open Space easement on-site. The project preserves Bonsall's significant prime and unique agricultural soils and is consistent with Soils Goal 2.

**TABLE 2.2-2
Cumulative Projects (Agricultural Resources) that do not
Substantially Impair Viability of Surrounding Agriculture**

Project Number	Reason for Determination of No Agricultural Impact
ZAP 70-139	Wireless facility (accessory use) ¹
ZAP 03-113	Wireless facility (accessory use) ¹
ZAP 99-021	Wireless facility (accessory use) ¹
ZAP 01-048	Wireless facility (accessory use) ¹
ZAP 02-022	Wireless facility (accessory use) ¹
ZAP 03-097	Wireless facility (accessory use) ¹
ZAP 04-035	Wireless facility (accessory use) ¹
ZAP 06-090	Wireless facility (accessory use) ¹
AD 07-101	Administrative permit, no agriculture on-site (minor expansion of existing use) ¹
AD 02-042	Administrative permit, no agriculture on-site (minor expansion of existing use) ¹
MUP 04-032	Additional condominiums in developed area
BA 98-0206	Boundary Adjustment ¹
BA 05-0019	Boundary Adjustment ¹
BA 99-0105	Boundary Adjustment ¹
BA 05-0087	Boundary Adjustment ¹
BA 01-0056	Boundary Adjustment ¹
BA 98-0049	Boundary Adjustment ¹
MUP 04-016	No agriculture on-site, no soils of importance on-site (minor expansion of existing use) ¹
ZAP 04-019	2 nd dwelling, no agriculture on-site (minor expansion of existing use) ⁽¹⁾
MUP 70-212-08	Moderate deviation (minor alteration of existing use) ⁽¹⁾
MUP 92-019-02	Moderate deviation (minor alteration of existing use) ⁽¹⁾
TM 4956	Withdrawn
TPM 20619	Withdrawn
AD 05-038	Withdrawn
MP 05-055	Withdrawn
TM 5387	Additional condominiums in developed area

⁽¹⁾ Per County of San Diego *Guidelines of for Determining Significance, Agricultural Resources*, Section 4.2.1 (2007).

2.2 Agricultural Resources

**TABLE 2.2-3
Cumulative Projects (Agricultural Resources)**

Project Number/ Name⁽¹⁾⁽²⁾	Direct Impact	Impact to FMMP Soils (Acres)	Agricultural Impacts
Rawhide Ranch MUP 72-618	1	<1	No indirect impacts are anticipated because there is no active agriculture on-site. Area identified with Farmland of Statewide Importance designation.
Marquart Ranch TM 5410	10	0	According to County records, there are no cumulative indirect agricultural impacts and minimal direct impacts.
Dabbs TM 5346	9	9	The project will directly impact an estimated nine acres of agricultural resources on Prime Farmland. No indirect impacts are anticipated because it is similar to existing residential/agricultural use in the area where these uses co-exist. Area identified with Prime Farmland designation.
Retreat MUP 94-025	0	0	The grove remains intact and the retreat will not be located on important farmland. No direct or indirect impacts are anticipated because the grove will be retained and the project is consistent with agricultural and residential mixed uses in the surrounding area.
McNulty TPM 20763	2	<1	Project directly impacts two acres of existing agriculture on the site, one acre of Unique Farmland. No potential indirect impacts are expected because orchards and vineyards remain viable the project is consistent with agricultural and residential mixed uses. Area identified with Farmland of Statewide Importance designation.
Hukari TPM 20830	3	0	It is expected that the orchard will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area.
Stehly (Camino Quieto) TPM 20799	<2	0	Less than two acres of existing grove will be directly impacted. No indirect impacts anticipated. Project is consistent with agricultural and residential mixed uses.
Nira Kohl TPM 20319	4	0	The county has determined through their analysis that there are no significant direct or indirect impacts anticipated by the project because the project is consistent with agricultural and residential mixed uses in the surrounding area.
Woodhead TPM 20541	4	0	It is expected that the grove will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area.
Brisa Del Mar TM 5492	0	0	No active agriculture and no soils of importance.
Sanders TPM 20845	2.5	0	This project directly impacts approximately three acres of greenhouse and/or truck crops on the site, 2.5 acres of which are Unique Farmland. There is no Prime Farmland or Farmland of Statewide Importance on the site. It is expected that the agricultural resources will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area.

2.2 Agricultural Resources

Project Number/ Name⁽¹⁾⁽²⁾	Direct Impact	Impact to FMMP Soils (Acres)	Agricultural Impacts
Pfaff TPM 21016	0	0	No impact to avocado grove.
Dressen TPM 20727	2	0	Two acres of avocado and citrus will be directly impacted.
Miller Residence P 99-043	0	0	No impacts.
Lilac Ranch TM 5358	0	0	No impacts.

⁽¹⁾ Please see Table 1-2 for a description of each cumulative project.

⁽²⁾ Please see Figure 2.2-2 for a map of the cumulative projects considered in the agricultural resources analysis.

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