

2.4 Agricultural Resources

This subchapter describes existing agricultural resources within the project site and vicinity; evaluates associated potential impacts from implementation of the project and applicable cumulative projects; and identifies related design considerations and mitigation measures. The analysis is based on the Agricultural Resources Technical Report prepared for the project (RECON 2014b) and Local Agricultural Resources Assessment (LARA) Model Results which are included therein. The technical report is included as Appendix F to this EIR.

2.4.1 Existing Conditions

2.4.1.1 Regulatory Framework

Federal

The United States Department of Agriculture (USDA) administers the Farmland Protection Policy Act of 1981. The Act is intended to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses. The act also requires these programs to be compatible with state, local, and private efforts to protect farmland.

State

California Civil Code Section 3482.5 (The Right to Farm Act)

In accordance with California Civil Code Section 3482.5, if a commercial agricultural use operates according to proper and accepted customs and standards (i.e., in compliance with all applicable state and federal statutes and regulations), has existed in its present location for three or more years and was not considered a nuisance when it began operations, the operations cannot become a private or public nuisance due to any changed condition in the locality, such as encroaching urban development.

California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, better known as the Williamson Act (California Administrative Code §51200 et. seq.), creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict land to agricultural and open space uses. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value, which saves landowners from 20 percent to 75 percent in property tax liability each year. Agricultural Preserves are areas that are eligible for Williamson Act Contracts; the boundaries of the preserve areas are drawn by the County and are adopted by resolution of the Board of Supervisors.

California Department of Conservation's Farmland Mapping and Monitoring Program

The goal of the California Department of Conservation's (CDC) Farmland Mapping and Monitoring Program (FMMP) is to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. The FMMP produces *Important Farmland*

Maps, which are a hybrid of resource quality (soils) and land use information. Agricultural lands are rated according to soil quality and irrigation status, with Important Farmland maps updated every two years based on aerial photograph review, computer mapping analysis, public input, and field reconnaissance. Designated categories of FMMP farmland, relevant to the project, include the following:

- Prime Farmland has the most favorable combination of physical and chemical features, enabling it to sustain long-term production of agricultural crops. This land possesses the soil quality, growing season, and moisture supply needed to produce sustained high yields. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to Natural Resources Conservation Service (NRCS) mapping. The project site does not contain any land designated as prime farmland.
- Farmland of Statewide Importance possesses minor shortcomings when compared to Prime Farmland, such as greater slopes and/or less ability to store moisture. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to NRCS mapping.
- Farmland of Local Importance is important to the local agricultural economy, as determined by the County Board of Supervisors and a local advisory committee.
- Unique Farmland is of lesser quality soils used for the production of the state's leading agricultural crops. Unique Farmland includes areas that do not meet the above stated criteria for Prime Farmland or Farmland of Statewide Importance, but that have been used for the production of specific high economic value crops during the two update cycles prior to the mapping date. It has the special combination of soil quality, location, growing season and moisture supply needed to produce sustained high quality and/or high yields of a specific crop when treated and managed according to current farming methods.
- Other Land consists of land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres.

In addition to the agricultural designations listed above that are provided through the CDC FMMP Statewide Important Farmland mapping system, the CDC also publishes a list unique to each county of soils that meet the soil quality criteria for Prime Farmland and Farmland of Statewide Importance.

California Department of Pesticide Regulation

The California Department of Pesticide Regulation regulates pesticide sales and use and fosters reduced risk pest management with the goal of protecting human health. Applicable regulations pertaining to the application of pesticides (in particular, methyl bromide) are found in Sections 6447, 6447.1, 6447.2, and 6447.3 of Title 3 of the California Code of Regulations. These regulations establish buffer zone requirements, work hour restrictions, notification requirements and other restrictions to address local

conditions. Permits for field fumigation are locally issued, by the County Department of Agriculture, Weights and Measures (AWM).

Local

County of San Diego General Plan

Appendix F includes a list of the most relevant General Plan and Community policies that relate to agriculture. A consistency analysis is included in subchapter 4.2 of Appendix F. Additionally, a General Plan Consistency Analysis of all General Plan policies is attached to the EIR as Appendix W.

County of San Diego Guidelines for Determining Significance – Agricultural Resources; Local Agricultural Resource Assessment Model (LARA)

The County of San Diego Guidelines for Determining Significance – Agricultural Resources present a range of quantitative, qualitative and performance levels for particular environmental effects relating to agricultural lands. The intent of the Guidelines is to provide a consistent, objective and predictable evaluation of significant effects. The Guidelines incorporate the LARA Model to identify if an agricultural resource (defined in the Guidelines) is important, and if so, whether a significant impact is caused, by a proposed development. The Guidelines also present significance thresholds for direct, indirect and cumulative impacts to agricultural resources.

The County PDS developed the LARA Model, to assess the relative value of agricultural resources in the County. The LARA Model serves as the local agricultural model that accounts for the variability of local agricultural resources and conditions. San Diego County has created the LARA Model to determine the importance of agricultural resources, in the context of discretionary land use projects. The LARA Model considers soils, climate and water as required factors, as well as complementary factors of surrounding land uses, land use consistency and topography.

San Diego County Agricultural Enterprises and Consumer Information Ordinance, §63.401 et seq.

This ordinance recognizes that the commercial agricultural industry in the County of San Diego is a significant element of the County's economy and a valuable open space/greenbelt resource for San Diego County residents. The ordinance recognizes that conflicts can occur between agriculture and certain other land uses; and it defines and limits the circumstances, under which agricultural enterprise activities, operations, and facilities constitute a nuisance. The ordinance requires that sellers of real property in unincorporated areas inform prospective buyers that the property could potentially be near an agricultural operation and project users may experience related inconveniences, irritations, and discomforts.

County Board of Supervisors Policy I-38

Specific elements of this policy include criteria for preserve establishment (e.g., eligibility and size), terms (i.e., contract duration), renewal/non-renewal and cancellation, as well as provisions for implementing eminent domain and fee/tax schedules.

County of San Diego Board of Supervisors Policy I-133

In 2005, the Board of Supervisors adopted Policy I-133 to establish the County's support of agriculture. The policy recognizes the Board of Supervisors' commitment, support, and encouragement of farming in San Diego County through the establishment of partnerships with landowners and other stakeholders to identify, secure, and implement incentives that support the continuation of farming as a major industry in San Diego. The intent is to develop and implement programs designed to support and encourage farming in San Diego County.

County of San Diego Farming Program

The County has completed a contract with American Farmland Trust to help develop the Farming Program. The Farming Program is intended to create the framework for an economically and environmentally sustainable farming industry for San Diego County. It also includes economic development tools to help improve farm profitability. The program includes land use policies and programs to keep land available and affordable for farming on a voluntary basis. One of those programs is the County's purchase of agricultural conservation easements (PACE) program which is an approved mitigation banking method. The program uses in-lieu fees to purchase PACE credits in order to offset agricultural impacts. Each acre of land permanently protected with an agricultural conservation easement under the PACE program would equate to one mitigation credit. ~~As of the date of the revised draft EIR, the mitigation component of the PACE program was approved September 17, 2014. had not yet been.~~

2.4.1.2 Existing Agricultural Resources

On-site Agricultural Uses

The primary land uses found in the project area are agricultural related, with the project site currently supporting several different types of crops, including citrus, avocados, row crops, nursery, and vineyards. Agricultural lands cover the majority of the southeastern, east-central, and northern portions of the project site (Figure 2.4-1). The northern and central agricultural areas consist of approximately 293 acres of orchard crops (primarily citrus and avocado) with some small areas of vineyard and nursery, while the southern concentration of existing agricultural uses (approximately 91 acres) are primarily labor intensive row crops (vegetables and strawberries). The small area of mapped vineyard supports varieties of grapes. An area used to produce stock for the commercial nursery business is located near the northwestern part of the site. Wells occur in scattered locations across the site and are used to provide water to the orchards, vineyards, and other agricultural areas. A few agricultural ponds that store water for irrigation purposes occur on the project site.

Soils

As detailed in the Agricultural Resources Technical Report, soil types within the project site consist of a series of sandy loam, coarse sandy loam, rocky sandy loam, and steep gullied land. Figure 2.4-2 shows the sandy loam and coarse sandy loam soils in the following soil series: Bonsall, Cieneba, Fallbrook, Greenfield, Placentia, and Visalia. Soils on steeper slopes and in gully bottoms are characterized as steep gullied land. These soil types are derived from weathered and decomposed granite or granodiorite.

Runoff is described as moderate to rapid and the erosion hazard is moderate to high for these soil types.

As previously noted, the CDC publishes a list of soils that meet the soil quality criteria for Prime Farmland soils and soils of Statewide Importance. The soil criteria are defined by the NRCS and are unique to each county. These soil criteria include a much broader range of soils than the Prime Agricultural Land definition in Government Code section 51201(c). Within Table 2.4-1, an asterisk (*) next to the soil type indicates a Prime Farmland soil, and a carrot (^) next to the soil type indicates a soil of Statewide Importance. As shown in the table, 63.4 acres of soils within the project site meet the definition of Prime Farmland soils or Soils of Statewide Importance; however, only 46.3 acres are available for agricultural use, as defined by the County Guidelines. As defined by the County Guidelines, the remaining 17.1 acres are considered unavailable because they have been disturbed or are compacted by structures or contain a sensitive biological habitat type.

In assessing project impacts, the primary focus is on those soils included on the CDC list of soils that meet the soil quality criteria for Prime Farmland soils and Soils of Statewide Importance, as shown on Table 2.4-1, On-Site Soil Resources, FMMP Soil Candidate Listing Designation.

FMMP Important Farmland Designations

As previously noted, to be distinguished from the CDC list of soils described above that meet the soil quality criteria for Prime Farmland soils and soils of Statewide Importance, are the lands designated by the FMMP on Important Farmland maps as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. These maps are based on consideration of several factors, including soil quality, irrigation status, and current land uses. These designations are used in the impacts analysis at the preliminary screening level only, prior to undertaking the LARA analysis.

Figure 2.4-3 illustrates the farmland designations within the project site based on the FMMP Important Farmland maps, including lands designated as Farmland of Statewide and Local Importance, Unique Farmland, and Other Land (CDC 2008). Under this designation system, there are no Prime Farmlands or Grazing Land on the project site.

Table 2.4-2 depicts the approximate acreage for each of the FMMP Important Farmland mapping categories within the project site and shows them as a percentage of the total project site.

**TABLE 2.4-2
ACRES OF FMMP FARMLAND ON-SITE AND
AS A PERCENT OF THE ENTIRE PROJECT SITE
(STATEWIDE MAPPING SYSTEM DESIGNATION)**

Category	Total Acres	Total Percent of Project Site
Prime Farmland	0.0	0%
Farmland of Statewide Importance	36.2	6%
Unique Farmland	329.2	54%
Farmland of Local Importance	146.3	24%
Grazing Land	0.0	0%
Other Land	95.9	16%
TOTAL	607.6	100%

History of Agricultural Use

Development within the project area began prior to 1901, as there are five structures on or within the vicinity of the project site according to 1901 USGS surveys reviewed by Affinis during preparation of the cultural resources report (see Appendix H-1). There are eight houses remaining on-site that are estimated to be over 45 years old; however, most of these houses do not appear on the 1946 or 1953 aerial photographs. In the 1963 aerial photograph there is evidence of some orchards in the northeastern and southern portions of the site, but the beginnings of the present pattern of agricultural production is not evident until the 1975 aerial photograph. Agricultural use appears to continue expanding through the 1970s and 1980s with the northern portions being heavily used for orchard crops (primarily citrus and avocado), while the southern portion is primarily used for row crops.

Pesticide Use

The California Code of Regulations (Title 3. Food and Agriculture, Division 6, Pesticides and Pest Control Operations) regulates the application of pesticides, but enforcement at the local level is the responsibility of the Department of AWM. The County Agricultural Commissioner (CAC) has final discretionary authority to approve or deny permits (California Department of Pesticide Regulation 2012). California is the only state with a pesticide permitting system which requires applicators to obtain a permit from a local official (the CAC). Regulations require the CAC to evaluate each restricted material use application and decide if it will cause substantial harm to people or the surrounding environment.

State pesticide regulations prohibit discharging pesticides directly onto a neighboring property without the consent of the owner or operator of the property, and there are also regulations and label requirements that prevent or minimize “drift” during aerial applications. Drift is the airborne transportation of residual pesticides, during or after

pesticide application, via aerial or ground spraying, onto adjoining properties or onto roadways, trails or other routes travelled, by the general public. Drift is a primary concern for neighboring property owners and the public, due to the possibility that pesticide drift may contribute to health concerns.

The CAC has final discretionary authority to approve or deny application permits (California Department of Pesticide Regulation 2012). If the CAC decides that substantial harm is likely (e.g., “drift”), the permit applicant may be required to evaluate alternatives (including not using a pesticide at all), or the CAC may impose extra controls designed to reduce the risk of harm to people or the environment. The CAC must deny a permit application if it is determined that use of the pesticide may harm people or the environment and no restrictions are available to mitigate that harm.

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The requirements in place for aerial pesticide applications are equally stringent and regulated at a local level by the CAC. A pilot must obtain the following to complete aerial applications within the County: a Qualified Applicator License; an Agricultural Pest Control Business License; and a Pest Control Aircraft Pilot Certificate. The pilot must also complete continuing education classes in order to renew the license. In order to attain the license, the pilot must understand and properly apply principles intended to maximize safety and minimize drift. These include guidelines and regulations for pre-application notification, calibration of equipment, droplet size, maximum wind speed, application speed, application height (altitude), ferrying to and from the job site, buffer zones, dilution, flow rate/volume per acre, spray patterns, and the purpose and toxicity of each particular pesticide to be applied. In addition, because the control of drift is always a priority, either an on-site ground crew “flagger” or smoke generator is used to provide direction to the pilot regarding wind direction and wind speed. Global positioning systems (GPS) are used to give the pilot precise data about swath locations such that only the minimum effective amount of the pesticide is applied. If the application site is unfamiliar to the pilot, the recommended procedure is for the pilot to scout the area for proximity to both flight hazards and also environmentally sensitive areas, such as lakes, streams, and riparian habitats or locations where people gather (e.g. schools, playgrounds, shopping centers).

The AWM in the County of San Diego inventories pesticide use permits per parcel number. The agricultural chemical products applications on the project site or within

1.5 miles of the project site within the last five years are mapped on Figure 2.4-4 and include the products listed in Appendix F (County of San Diego 2012b).

As discussed in the Phase I Environmental Site Assessments (see subchapter 2.7), the agricultural activities which have occurred across much of the project site have included the application of fertilizers, herbicides, and pesticides. As such, most of the RECs investigated are associated with agricultural use. Soils contaminated by agricultural activities are a concern, because of land use changes involving the construction of developments on former agricultural lands. Constituents of concern associated with active and former agricultural operations within the project site include organochloride pesticides and metals, which may pose a human health risk. Several soil samples found on the project site were above the applicable thresholds. Previous soil sampling on one of these properties in 2007–2008 showed toxaphene levels in soils, above the screening levels. On another property, elevated levels of chlordane and toxaphene were documented during soil testing. As discussed in subchapter 2.7, there is a possibility that on-site soils could contain significant levels of chemical residues and remediation measures (e.g., removal of the soils in question) are required to reduce the identified impacts to less than significant levels.

Climate

San Diego County is divided into a series of "plantclimates," which are defined as areas "[i]n which specific plants, groups or associations are evident and will grow satisfactorily, assuming water and soil are favorable" (County of San Diego 2007c). Plantclimates in San Diego County occur as a series of five generally north-south trending linear zones, including the Maritime, Coastal, Transitional, Interior and Desert zones (from west to east, respectively). These areas are influenced by factors including topography and proximity to the ocean, and are generally gradational inland, with the project site located in the Transitional Zone.

The project site is located within Sunset Zone 23 (within the Transitional zone), which is one of the most favorable for growing subtropical plants and most favorable for growing avocados (County of San Diego 2010a). Climate conditions for the project site are typical of a Mediterranean climate regime, with a wet winter rainy season followed by a hot, dry summer. Spring and fall months tend to be mild in temperature and variable in rainfall amounts. The average January low temperature for the area is approximately 40°F, and the average July high temperature is between 85°F and 90°F. Average annual rainfall is 15 inches.

Water Resources

The project site is within the San Diego County Water Authority (SDCWA) and is served by the VCMWD, which has existing water transmission, storage, and distribution facilities (including meters), within much of the project site (see subchapter 3.1.5). VCMWD has delivered in excess of 250 acre-feet of water per year to the project site, principally for irrigation. Many of the properties also contain working wells (see Appendix F) and use groundwater to supplement water from VCMWD in order to irrigate orchards and common area landscaping during drier and hotter periods of the year. Groundwater aquifer type under the project site is Fractured Crystalline Rock, which can store groundwater, but is not considered to have as much capacity as other aquifer types.

Williamson Act Contracts Lands/Agricultural Preserves

There are no Williamson Act contract lands or agricultural preserves, within the project site. However, there is an agricultural preserve (Preserve #88) located adjacent to the southeast corner of the project site. In addition, there are six parcels under Williamson Act Contract to the northeast (Figure 2.4-5). In total, there are 97.3 acres of Williamson Act contract lands and 242 acres of agricultural preserves within one mile of the project site.

Surrounding Land Uses

The land uses in proximity to the project site (within an area roughly bounded by West Lilac Road to the east and north; Circle R Drive to the south; and I-15/Old Highway 395 to the west) are agricultural in nature, primarily orchards and nurseries, but also row crops (Figure 2.4-6). To the southwest of the project site lies the Champagne Lakes R.V. Resort, and beyond that is the Circle R Resort Specific Plan area containing the Castle Creek Inn and Resort as well as single- and multi-family residential and a golf course.

Surrounding Agricultural Uses

Local agricultural operations and uses include all or some of the following: cultivation; plowing; spraying; pruning; harvesting; and drying. Specific agricultural uses within a one-mile study area are described below. The one-mile study area is measured from the project site boundary and is based on the County's "Report Format and Content Requirements" regarding the development of school sites in agriculturally zoned areas. The extensive agricultural operations located within one-mile of the project site are shown on Figure 2.4-6 and are categorized as one of the following general types: "mixed use orchards," "nurseries and greenhouses," "row crops," and minor vineyard/minor orchard ("estate residential") uses, as well as "undeveloped."

- **Mixed-use Orchards** - There are approximately 1,347 acres within the one-mile zone around the project site that fall into this category. This category consists of citrus and avocado orchards, with the citrus orchards being most prevalent within the flatter portions of the site with well-developed soils and avocados being present within the steeper areas. Orchards within the one-mile zone consist primarily of commercial scale operations located to the north and south of the project site. Most of the smaller scale orchards (approximately 2–4 acres) are considered part of the "estate residential" category, as discussed below.
- **Row crops** are those areas used to grow labor intensive crops such as tomatoes, beans, strawberries, herbs, and peppers. The majority of row cropping operations that exist in the project area are those located within the project site. Within the one-mile zone, there are only 3 acres of row crops mapped. This category is also sometimes referred to as "truck crops" and should be distinguished from "Intensive Agriculture" (which generally includes operations such as chicken farms, dairies, and feed lots) and from "Field Crops" which are crops that require few inputs such as alfalfa, oats, wheat, and other similar crops.
- **Nurseries and greenhouses** are usually small in scale with respect to acreage. They typically contain structures used to cultivate high-value products such as

flowering/foilage plants and gourmet food products such as mushrooms. They may also be used to grow commodities such as landscaping, decorative plants, fruit trees, herbs, and flowers. There are 306 acres present within the one-mile zone that fall into this category.

- **Estate residential** is a category in which agricultural operations are an incidental use to the large lot residence that is the primary land use. This category can be typically characterized by small orchards located on residential parcels approximately 2–4 acres in size. It should be noted that, although small in size, orchards that fall within this category can be an important agricultural resource because more than two-thirds of farms within San Diego County are between one and nine acres in size and four acres is the median farm size. Despite their small size, farms in San Diego County generated over \$1.6 billion in 2010. There are 724 acres of this category within the one-mile buffer area.
- **Undeveloped** - The remaining 2,500 acres within the one-mile zone around the site is comprised primarily of undeveloped open space with native habitat, although there are a few areas which may once have been agriculture that has been allowed to revegetate with native habitat types.

2.4.2 Analysis of Project Impacts and Determination of Significance

For the purpose of this EIR, the ~~identified~~ significance thresholds are ~~from based on~~ criteria provided in Appendix G of the State CEQA Guidelines and the County's Guidelines for Determining Significance – Agricultural Resources, adopted March 19, 2007, which are adapted from criteria provided in Appendix G of the State CEQA Guidelines. The specific thresholds applied in the analyses are provided below under each Issue category. In general terms, however, ~~the~~ project would result in a significant impact if it would:

1. *Direct Conversion of Agricultural Resources:* Result in the direct conversion of agricultural resources.
2. *Land Use Conflicts:* Conflict with a Williamson Act Contract or with existing zoning for agricultural use.
3. *Indirect Conversion of Agricultural Resources:* Involve other changes in the existing environment, which due to their location or nature, could result in conversion of a San Diego County agricultural resource to non-agricultural use.

2.4.2.1 Issue 1: Direct Conversion of Agricultural Resources

Guidelines for the Determination of Significance

Based on the County's Guidelines for Determining Significance – Agricultural Resources, adopted March 19, 2007 (San Diego County 2007c), a significant impact would occur if the project site has important agricultural resources as defined by the 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.

Analysis

In assessing project impacts, the first step in the analysis is determining whether the project site contains important agricultural resources as defined by the LARA Model.

LARA Model Analysis

The agricultural resources technical report (see Appendix F) includes a LARA Model analysis consistent with the County’s Guidelines. Based on the results of the LARA Model, the site is considered an important agricultural resource as summarized in Table 2.4-3 below. Table 2.4-3 shows that the site received a moderate rating for soil quality and high ratings for climate and water resources. These three criteria are Required Factors, pursuant to the LARA Model. Since two of the three Required Factors are rated high and one was rated moderate, the Complementary Factors were also modelled pursuant to the LARA Model requirements. The site received a high rating for the Surrounding Land Uses factor and a moderate rating for both Land Use Consistency and Slope factors. Based on Table 2.4-4, this result would place the project site within Scenario 2, which means that the site is an important agricultural resource.

**TABLE 2.4-3
LARA MODEL RESULTS**

	LARA Model Rating		
	High	Moderate	Low
Required Factors			
Climate	✓		
Water	✓		
Soil Quality		✓	
Complementary Factors			
Surrounding Land Uses	✓		
Land Use Consistency		✓	
Slope		✓	

**TABLE 2.4-4
INTERPRETATION OF LARA MODEL RESULTS**

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

Important On-site Agricultural Resources

Once it is determined through the LARA model process that the project site contains "important agricultural resources," the next step is to determine whether the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance.

The site has been historically farmed and has not been previously developed; with the exception of a few scattered rural residences. Most of the area proposed for development has been previously disturbed (445.09 acres; 73.4 percent) either by agricultural uses, roads, or rural residences and associated ornamental landscaping. The remaining 160.3 acres (26.3 percent) of the site, much of which is constrained by steep topography, is currently undisturbed and supports significant biological or cultural resources, which would be preserved as open space. There are also several drainage features (see subchapter 2.5, Biological Resources) vegetated with riparian communities that would be left undisturbed.

The project would develop a total of 466.7 acres of the site for up to 1,746 dwelling units, a commercial village center, retail uses, a school site, and an active park/village green. The remaining approximately 124.4 acres of the site would remain as open space (20.3 as agriculture/common areas and 104.1 as biological/wetland habitat).

As shown on Table 2.4-1, there are a total of 63.4 acres of on-site soils (10 percent of the project site) that meet the Prime and Statewide Importance soil candidate criteria. However, based on the definition found on page 28 of the Agricultural Resources Guidelines (County of San Diego 2007c), 17.1 acres are "unavailable for agricultural use" based on the fact that they lie within areas previously developed with roads, residences, or native habitat that has not been previously disturbed by agriculture. The remaining 46.3 acres meet the criteria to be classified both as a soil of Prime or Statewide Importance and "available for agriculture."

As to the number of those 46.3 acres that will be converted to non-agricultural uses as a result of the project, the project includes areas shown for "common areas/agriculture" and "manufactured slopes" (see Table 1-1), which may be planted with citrus and avocado trees; however, these areas would be HOA-maintained and conservation easements are not proposed that would ensure continued agricultural use. Further, mass grading would be required in these areas to create the building pads and manufactured slopes. Separately, of the 23.8 acres of agriculture which lies within the biological open space (riparian) buffers proposed as part of the project design, just 2.53 acres contain soils of Prime or Statewide Importance. Therefore, it can be assumed that, with the exception of the 2.53 acres (preserved permanently as an agricultural area within a biological conservation easement), all of the soils that meet the Prime and Statewide Importance soil candidate criteria would be converted to non-agricultural uses. The preservation of the 2.53 acres within the agricultural buffers/open space, shown in Figure 18 of Appendix F, means that total conversion of Prime and Statewide Importance Soils would be 43.8 acres ($46.3 - 2.5 = 43.8$). Pursuant to the LARA Model analysis performed for the project (see Appendix F), the site was determined to be an important/significant agricultural resource. Based on the County Agricultural Resource Guidelines, Section 4.1.1 (page 36), direct impacts would occur because the project site meets all three criteria: (1) it was determined to be an important agricultural resource after a run of the LARA Model; (2) the project would result in the

conversion of 43.8 acres of soils that are available for agricultural use and would meet the soil quality criteria for Prime Farmland or Statewide Importance; and (3) would substantially impair the ongoing viability of the site for agricultural use. As a result, the project would result in a **significant direct impact** to agricultural resources (**Impact AG-1**).

Off-site Improvement Impacts

There are six areas, where off-site roadway improvements would be required to accommodate project traffic (see Figure 2.4-5). These six areas are evaluated below:

1. **West Lilac Road:** The widening to 2.2F Light Collector west toward the Walter F. Maxwell Memorial Bridge would impact 1 acre of Other Land and 2.37 acres of Unique Farmland, based on the statewide FMMP Important Farmland map designations.
2. **Lilac Hills Ranch Road:** This private easement connection would affect 1 acre of land which is mapped as Farmland of Local Importance but which is a dirt road between two estate residential parcels that is not currently farmed.
3. **Covey Lane:** Widening this road from 28 feet to 40 feet would impact approximately 0.8 acre of Other Land and 0.35 acre of Unique Farmland (currently utilized for orchard crops), based on the statewide FMMP Important Farmland map designations.
4. **Street B:** These 310 feet of improvements along a 50-foot-wide private easement would impact 0.35 acre of Unique farmland and 0.04 acre of Farmland of Local Importance, based on the statewide FMMP Important Farmland map designations.
5. **Mountain Ridge Road:** This private easement connection would require 3,800 feet of improvements from the southern project boundary south to a connection with Circle R Drive. The 40-foot right-of-way required for this off-site improvement would impact 0.6 acre of Farmland of Local Importance, 0.5 acre of Other Land, and 0.9 acre of Unique Farmland, based on the statewide FMMP Important Farmland map designations.
6. **Rodriguez Road:** This 40-foot-wide graded road easement would be paved 24 feet from Lilac Hills Ranch Road to Covey Lane.
7. **Miller Station:** The off-site improvement options for the Miller Station. The site is disturbed by the existing fire station, driveway, and landscaping. The site is mapped by the FMMP as "Other Land."

The direct impacts resulting from off-site roadway improvements to off-site agricultural resources and operations described above would be **less than significant** based on the following considerations: (1) the small impact acreages; (2) the locations generally occurring along ROW of existing roadways (even if private); and (3) the fact that no Prime Farmland or Farmland of Statewide Importance would be affected. Some small acreages mapped as Unique Farmland under the statewide FMMP Important Farmland map designations would be affected along West Lilac Road (off-site #1) and Mountain

Ridge Road (off-site #5); however, these areas are within ROW of existing roadways and are not part of any active agricultural operations.

2.4.2.2 Issue 2: Land Use Conflicts

Guidelines for the Determination of Significance

Based on the County of San Diego Guidelines for Determining Significance – Agricultural Resources (County of San Diego 2007c), the project would have a significant impact if it conflicts with Agricultural Zoning and/or Williamson Act Contracts.

Analysis

Agricultural Zoning

Current zoning is “Limited Agriculture” (A70), within the VCCP area; and Rural Residential (RR) within the BCP area. The project would rezone the site to either Residential Use (RU) or C34 General Commercial-Residential Use Regulation.

In San Diego County, agriculture is allowed in any zone, and there are no exclusive agricultural zones. The proposed Specific Plan and rezone would make the site’s zoning consistent with proposed use. The concept of the project is to create a village, which would be compatible with the rural/agricultural nature of Valley Center; thus, the Specific Plan does not preclude agriculture within the project site. As explained in subchapter 2.4.2.3, the project would not cause any significant impacts to off-site, adjacent agricultural operations. Therefore, as the zoning would be changed to allow the project, impacts to agricultural zoning would be **less than significant**.

Williamson Act Contracts/Agricultural Preserves

As described in the Agricultural Resources Technical Report (see Appendix F), there are no Williamson Act Contracts or Agricultural Preserves within the project site. The two parcels under Williamson Act contract nearest the project site are approximately 0.6 mile from the project boundary and are on the opposite side of Keys Canyon. Because of the distance and geographic isolation due to the rugged terrain of Keys Canyon; indirect (compatibility) impacts related to nuisance factors such as noise, dust, theft, and odors would be **less than significant**.

Agricultural Preserve Number 88 is located directly adjacent to the southeast project boundary, east of Rodriguez Road. As explained in subchapter 2.4.2.3, the project would not cause any significant impacts to off-site, adjacent agricultural operations. Because the project would not impact the Williamson Act contracted lands to the north, and the Agricultural Preserve Number 88, adjacent to the project site is not within a Williamson Act Contract, no significant indirect impacts are anticipated to occur; thus, impacts would be **less than significant**.

2.4.2.3 Issue 3: Indirect Conversion of Agricultural Resources

Guidelines for the Determination of Significance

Based the County of San Diego Guidelines for Determining Significance – Agricultural Resources (County of San Diego 2007c), the project would have a significant indirect impact if it would:

- Propose a non-agricultural land use within a 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 project would likely occur and could result in conversion of agricultural resources to a non-agricultural use;
- 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 project would likely occur and could result in conversion of agricultural resources to a non-agricultural use; or
- 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 Contract.

A potentially significant indirect impact to a San Diego County agricultural resource would occur if the project would result in compatibility conflicts with existing agricultural activities. Land use/agricultural interface issues often arise from dust, noise, liability concerns, trespassing, theft, competition for water, traffic, pest introduction and conflicts with pesticide use. Schools, religious institutions, hospitals, senior housing and daycare facilities (among others) create concentrations of people and are considered to be especially vulnerable public receptors, when it comes to exposure to air contaminants, hazardous materials, and pesticides.

The type of agricultural use and the sensitivity of the nearby land uses are the other key considerations in determining agricultural compatibility. As an example, orchard crops would be more likely to be compatible with surrounding residential uses than a confined animal feeding operation. In addition, if a sensitive use such as a school, church, day care or other use involving a concentration of people is proposed within one mile of an existing agricultural operation or land under Contract, land use/agricultural interface conflicts could increase. If these conflicts would result in the conversion of agricultural resources to a non-agricultural uses, then a significant impact would occur.

Analysis

Proposed School Site

The California Department of Pesticide Regulation regulates pesticide sales and use and fosters reduced risk pest management with the goal of protecting human health. Locally, pesticide permits for field fumigation are issued by AWM. Relative to the siting of schools, the California Education Code (CEC) establishes the law for California public

education. CEC requires that the DTSC be involved in the environmental review process for the proposed acquisition and/or construction of school properties that will use State funding. The DTSC School Property Evaluation and Cleanup Division is responsible for assessing, investigating and cleaning up proposed school sites and maintains a list of environmental assessments and the findings. The CEC requires a Phase I ESA be completed prior to acquiring a school site or engaging in a construction project. Depending on the outcome of the Phase 1 ESA, a Preliminary Environmental Assessment and remediation may be required. Notwithstanding all of the aforementioned processes, the applicant would simply be offering the school site; the school district is not required to accept the land and would have full discretion as to whether a school is ultimately constructed on the site.

A 12-acre school site is proposed within the south-central portion of Phase 3. There are no areas of row crops or nursery/greenhouses within the vicinity of the proposed school; but there are existing orchards to the south of the school site. The school site is approximately 325 feet from the project boundary. As shown in the Landscape Plan (see Figure 1-14), an additional row of trees would be provided along the southern boundary of the school site.

Figure 2.4-4 shows that the orchards directly south of the school site utilize aerial (helicopter) chemical applications as a means of pest control. Figure 2.4-4 also shows that aerial spraying on the property nearest the school occurred 5–10 times within the last five years, which equates to once or twice per year on average. These health concerns can cause complaints, which may cause indirect (compatibility) impacts from the proposed new on-site uses to the off-site agricultural resource.

As previously discussed, CCR Title 3, Division 6 regulates the application of pesticides and prohibits discharging pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. The regulations also require prevention or minimization of “drift” during aerial applications and mandates the aerial application buffers be measured from the property line into the agricultural property.

Also as previously discussed, the CAC has final discretionary authority to approve or deny application permits. If the CAC decides that substantial harm is likely (e.g., “drift”), the permit applicant may be required to evaluate alternatives (including not using a pesticide at all), or the CAC may impose extra controls designed to reduce the risk of harm to people or the environment. The CAC must deny a permit application if it is determined that use of the pesticide may harm people or the environment and no restrictions are available to mitigate that harm.

Based on the infrequency of aerial applications and the ability of the County to place conditions on permits for aerial applications to limit drift, surrounding agricultural operations would be able to continue their customary agricultural practices, including aerial spraying, without adversely affecting the school students. The additional row of trees placed along the southern boundary of the school site would further buffer the school site from agricultural operations. As a result, the presence of the school, 325 feet from off-site agricultural uses with historic aerial spraying is not expected to restrict typical agricultural practices in a way that could result in the conversion of agricultural resources to a non-agricultural use.

Because the project design locates the school site away from the project boundary (325 feet), and state regulations prevent aerial pesticide “drift” onto neighboring properties; indirect impacts associated with the proposed school would be **less than significant**. In addition, the future school site would include fencing and security gates to prevent unauthorized ingress or egress thus eliminating associated trespass/vandalism conflicts.

Park

The proposed park would also create concentrations of people and be a sensitive receptor. Further, the park, unlike the school, would be directly adjacent to the off-site orchards. In this case, the most likely compatibility impacts to the agricultural sites would be trespass, noise, liability concerns, theft and vandalism, water runoff and urban pollutants (from park irrigation). Possible compatibility concerns to the project would be pesticide drift and potential noise from nearby agricultural activities. This represents a **significant impact** at this location (**Impact AG-2**).

Institutional

The proposed “Institutional” land use lies within Phase 5 of the project, in the southernmost portion of the site. To the south there is a biological buffer ranging from 150 to 500 feet in width that provides a buffer between the institutional use and the agricultural operations located along the southern project boundary. The agricultural operations nearest (to the east) of the institutional use do not utilize aerial pesticide applications (see Figure 2.4-4) and the nearest operations that do are approximately 280 feet from the project boundary. Although the biological buffer provides an adequate buffer to the south, the eastern project boundary includes agricultural uses adjacent to the institutional use; ~~however,~~ because of the sensitive population involved with this use, this represents a **significant impact** at this location (**Impact AG-3**).

Age-Restricted

The senior citizen’s neighborhood proposed within Phases 4 and 5 is low-density single-family detached housing similar to the detached housing found within Phases 1 through 3. The only difference is that SFS-1 through SFS-6 would be age-restricted to 55 and older. Based on the age of the population served, this area is considered a sensitive receptor, and represents a **significant impact** at this location (**Impact AG-4**).

Group Residential Care

~~Group residential or (GR) would include “Group Care” land uses~~ Group residential or (GR) would include “Group Care” land uses ~~would include~~ would include units for independent living, assisted living, and dementia care. With approximately 200 units within a 6.5-acre site, this land use type would be considered a sensitive receptor. ~~The GR~~ This area borders off-site estate residential land uses to the east. The remaining three sides are internal to the project site: biological open space lies to the south; and SFS (age restricted single-family detached) is to the north and west. The nearest active agricultural operation ~~to the GR~~ would be approximately 2,400 feet to the southeast or 2,900 feet to the east. As shown on Figure 2.4-4, neither of these agricultural operations is subject to aerial spraying. Because of the distance between these land uses and the fact that no aerial spraying has historically occurred; **no significant impacts** are anticipated.

Urban/Agricultural Interface Compatibility

As stated in the General Plan Update EIR: “Conflicts at the agriculture/urban interface flow in two directions: from existing agricultural use to a newly established non-agricultural use and from a newly established non-agricultural use to existing agricultural use” (County of San Diego 2011c). The Specific Plan includes various features that would promote project compatibility with surrounding agricultural operations. For example, the Specific Plan requires that open space or larger lots in certain portions of the project site be located near the project boundaries to provide a land use transition to adjacent agricultural operations (Specific Plan, Part III, Section E.4.b.xi). The Specific Plan also includes roadway landscaping standards that are specific to roadways adjacent to portions of the project perimeter, thereby offering opportunities to create blended transitions between the developed, ornamental portions of the project, and the surrounding agriculture or natural open space (Specific Plan, Part III, Section D.3.c). These areas would be planted with primarily native and naturalizing drought tolerant plant species with possible addition of groves of fruit trees.

Part III of the Specific Plan, Section J.2 describes the agricultural uses proposed in the on-site open space that would also provide land use transitions and increase compatibility with off-site agricultural operations. In addition, the Specific Plan allows for interim agricultural uses to continue on-site prior to their development (Specific Plan, Part III, J.2.c). Part III of the Specific Plan, Section E.4.b.xi. provides site planning guidelines for single-family detached residential neighborhoods and requires that consideration be given to additional opportunities to reduce conflicts between the project and adjacent properties, including providing a grade separation and planting buffers to allow vegetation to mature and screen the adjoining properties.” These project design features would improve project compatibility with the surrounding community and surrounding agricultural operations.

Urban/agriculture interface impacts can result in indirect impacts to existing agricultural operations that make farming less viable from a financial and practical perspective. However, the proposed project would not affect the viability of agricultural operations in the vicinity of the project because (1) the crop types found within the vicinity are primarily citrus and avocado groves and flower/nursery operations, which are not usually found to be incompatible with residential uses; (2) the proposed residential uses do not create conditions (e.g., air contamination/degradation, nighttime lighting) that would adversely affect off-site agriculture; (3) the project would be subject to regulatory requirements for the control of storm water discharges; and (4) the project would include homeowner disclosure documents issued pursuant to the County Agricultural Enterprises and Consumer Information Ordinance. This conclusion is consistent with agricultural use patterns in the County as viable farming in the County typically occurs among residential land uses (County Guidelines, p. 47; see also General Plan EIR; p. 2.2-32 (August 2011) [“small farming operations are typical in the County, and many existing and potential agricultural operations are located on small parcels with intermixed surrounding land uses.”]).

Notwithstanding the proposed project design features, Specific Plan policies, and overall compatibility of the crops types in the surrounding area with residential use, residential land uses are proposed adjacent to off-site farmland along portions of the project boundary. This section analyzes potential impacts associated with urban/agricultural

interface compatibility for agricultural resources immediately adjacent to the project site based on project development phase (i.e., Phase 1 through Phase 5).

For ease in referencing specific locations over the project site, Figure 2.4-7 shows the agricultural adjacency areas within the project phasing. In addition, in order to analyze specific areas where off-site indirect compatibility impacts may occur, “agricultural adjacency areas” (AA) have been identified on Figure 2.4-7 where off-site agricultural uses (hotspots) are adjacent to proposed on-site residential areas. Agricultural adjacency (AA) areas 1 through 13 were identified through a combination of site visits, reviewing aerial photographs, biological resources mapping, the proposed phasing and open space buffers exhibits, and a review of the SANGIS data layer for “Ground and Aerial Applications in the past 5 years,” which is shown on Figure 2.4-4.

Phase 1

The project design for Phase 1 incorporates biological open space and FMZ along the northwestern boundaries that are approximately 100 feet in width in most areas, but range between 50 and 100 feet where alternative fuel management measures are recommended. Additionally, existing citrus groves or other common area landscaping would be retained around the NAP water tanks located within the southwestern corner of Phase 1. The southeastern portion of Phase 1 lies within the proposed biological open space, which, in combination of fuel modification zones, would serve as a continuation of the aforementioned buffer along the southwestern boundary of the Phase 1 area. Despite the proposed biological open space and limited building zones (LBZs), four AAs were identified within Phase 1; these are discussed in greater detail as follows:

- AA 1 is located along the northern project boundary. There is a large area of orchards located relatively close (approximately 150 feet) to residential uses proposed as part of Phase 1. However, there is an off-site, triangular shaped residential parcel between the orchards and the project site. Thus, due to the intervening land uses, the West Lilac Road ROW, and the off-site residential parcel, the existing separation (ranging from 115 feet to 225 feet) would be adequate to avoid conflicts, and impacts would be **less than significant**.
- Adjacent to the extreme northwestern corner of the project site, across West Lilac Road, AA 2 includes another large area of orchards which have been subject to aerial pesticide applications (see Figure 2.4-4). There is a potential for compatibility impacts to this existing agricultural land. However, West Lilac Road is to be improved to a width of 78 feet and there would be between 50 and 90 feet of FMZ on-site. The combination of FMZ and road improvements (the total ranging from between 128 to 168 feet) would provide adequate separation between on-site uses and off-site agricultural operations to avoid edge effects and impacts would be **less than significant**.
- Adjacent to Stadel Lane, AA 3 is also located along the northwestern corner of the project site and is depicted in Figure 2.4-7a. To the west (approximately 130 feet away) are an estate residence and groves, and a youth camp and religious retreat. As shown on Figure 2.4-4, this operation has not been subject to aerial spraying in the past 5 years; the likely reason being the presence of the existing residence. While the indirect-compatibility effects associated with AA 3 would not include aerial pesticide applications; other edge effects such as noise, dust,

odors, and theft/trespass could still result in potential impacts. There is an existing 60-foot road and utility easement along AA 3, with approximately half being within the project site and half off-site. The half-width (30 feet), which includes the ROW width of Stadel Lane does not, by itself, provide an adequate separation of land uses. This represents a **significant impact** at this location (**Impact AG-5**).

AA 4 is located along the southwestern corner of Phase 1 near the existing water tanks, adjacent to the existing Rocking Horse Road. AA 4 is depicted in Figure 2.4-7b. The project would retain a portion of the existing orchards surrounding the NAP water tanks. In addition, a park (Park "P-1") is proposed directly south of the water tanks. Off-site agriculture includes orchards directly west of the water tanks, as well as orchards and estate residences to the south of the water tanks. The proposed park, as well as the retention of existing orchards surrounding the water tanks would adequately buffer the western portion of AA 4 from the off-site agriculture. For those areas where orchard trees off-site are adjacent to non-agricultural uses on-site, land use adjacency conflicts could occur. ~~the project includes a limited building zone (LBZ) which expands the total buffer from 50 feet (the agricultural buffer with two rows of orchard trees) to 75 feet. However, t~~Those off-site areas within AA 4 that contain orchard trees but are not immediately adjacent to the on-site retained orchards would represent a **significant impact** at this location (**Impact AG-6**).

Development of Phase 1 would result in the construction of residential units in proximity to the mixed orchard operations occurring both north and south of West Lilac Road and west of Stadel Lane. As discussed above, the cumulative project list includes the Marquart Tentative Map which may convert the existing orchards north of the northwest corner of the project site. Further, pursuant to the County's Agricultural Enterprises and Consumer Information Ordinance, project design considerations including the dissemination of disclosure statements would be required in sales documentation for all proposed residential units. The statements would notify potential owners that the adjacent property could potentially be used for agricultural operations and that there could be associated issues such as odors, noise, and vectors. In addition, there would be on-site open space buffers, which occur in various locations within Phase 1 as either biological, agricultural, or landscaped open space, as well as FMZ areas. CCR Title 3, Food and Agriculture, Division 6, Pesticides and Pest Control Operations, would prohibit the discharge of pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. It also includes regulations and label requirements that prevent or minimize "drift" during aerial applications. Notwithstanding state law and project design considerations, **significant impacts** would occur at AA 3 and AA 4.

Phase 2

Phase 2 lies within the interior of the project site and does not border any agricultural adjacency areas. However, three of the four NAP parcels share a boundary with Phase 2. Two of the NAP parcels within Phase 2 are estate residential uses that would not pose any agricultural adjacency issues. The third, irregularly shaped parcel contains greenhouse/nursery operations. The active greenhouse/nursery uses are limited to the southern portion of the NAP parcel that is approximately 400 feet from the Phase 2 land

uses. Therefore, indirect impacts associated with Phase 2 would be **less than significant**.

Phase 3

Along the entire western boundary of Phase 3, biological open space would be preserved, which would serve as a compatibility buffer for the limited agricultural operations occurring to the west of Shirey Road. No conflicts would occur along the northern boundary or at the southeastern corner where Phase 3 borders the corner of Phase 4. However, AA 5, 6, and 7 lie along the eastern and southern boundaries of Phase 3 (see Figure 2.4-7 and Figures 2.4-7c through 2.4-7e). These AA areas are analyzed further as follows:

- As shown on Figure 2.4-7 and 2.4-7c, AA 5 involves the placement of residential uses directly adjacent to the off-site groves that are surrounded on three sides, by the project. This represents a **significant impact** at this location (**Impact AG-7**).
- AA 6 is located along the northern boundary of VC11 (and south of the proposed school and public park (Park "P-10")). Refer to Figure 2.4-7 and 2.4-7d. Off-site orchards are located adjacent to the project site in this location. However, ~~T~~the school would be more than 300 feet away from the off-site agriculture, as the proposed park site intervenes. As addressed above, a **significant impact** would occur at this location (**Impact AG-2**) relative to the park itself (because of its sensitive users).
- The third area of potential indirect impacts within Phase 3 is AA 7, along the eastern boundary where the proposed residential uses are adjacent to off-site flower crop production with nursery/greenhouse uses (Figure 2.4-7e). The production of cut flowers is a labor-intensive operation, but is not generally associated with dust or noise, as mechanized equipment is not used because of the nature of the crop. In addition, aerial spraying is not used for cut flower or nursery crops so pesticide use would not be a factor. With respect to indirect impacts to this flower operation from the project, project design considerations associated with lighting would be required to assure all lighting is shielded and directed away from the off-site parcels (as described in Specific Plan Section 3.D.10). Additionally, the project includes an FMZ within AA 7. Notwithstanding the project design considerations, standard practice of flower farming and designation of the FMZ, the adjacency to off-site agricultural uses represents a **significant impact** at this location (**Impact AG-8**).

Similar to Phase 1, disclosure statements would be required in sales documentation for all proposed residential units pursuant to the County's Agricultural Enterprises and Consumer Information Ordinance. Phase 3 also includes biological open space along its western and much of its northern boundaries and FMZs which serve as buffers along the southeastern and eastern boundaries; however, **significant impacts** would occur within AAs-5, 6, and 7.

Phase 4

Phase 4 has a large east-west trending biological open space corridor. No conflicts would occur along the eastern boundary or at the southwestern inset where Phase 3 borders only on undeveloped land or estate residential uses. However, AA 8 and AA 9 lie along the northeastern and a portion of the western boundaries of Phase 4 (see Figure 2.4-7 and Figures 2.4-7f and 2.4-7g). These AA areas are analyzed further as follows:

- The age-restricted residential uses along a portion of the western boundary of Phase 4 are within AA 8. There are intensively farmed groves to the west of Phase 4 (see Figure 2.4-7f). These same groves are also associated with AA 5 and AA 6 as discussed above. Similarly, AA 8 would involve the placement of residential uses directly adjacent to the off-site groves that are surrounded on three sides by the project. As discussed above, this represents a **significant impact** at this location (**Impact AG-4**).
- The northeastern portion of Phase 4 contains residential uses that are adjacent to off-site agricultural groves (AA 9, see Figure 2.4-7g). A 100-foot FMZ₁ is located at this location adjacent to proposed residences, and the existing and proposed Covey Lane, would provide some buffering. Additionally, an 80-foot buffer would result from the proposed realignment of Covey Lane. Notwithstanding these proposed design features, adjacency to the off-site operations represent a **significant impact** at this location (**Impact AG-9**).

As described above, development of Phase 4 would result in the construction of age restricted residential units in close proximity to the agricultural operations occurring along the western boundary of this phase as well as along Covey Lane. As required by the County's Agricultural Enterprises and Consumer Information Ordinance, disclosure statements would notify potential owners that the adjacent property could potentially be used for agricultural operations and that there could be associated issues, such as odors, noise, and vectors. However, **significant impacts** would occur at AA 8 and AA 9.

Phase 5

Phase 5 would be located directly south of Phase 4. Phase 5 is planned for 297 single-family senior residential units, approximately two-acres of parks, and 10.7 acres for institutional use. Also included in Phase 5 is a detention basin. As with Phase 4, Phase 5 has a large east-west trending biological open space corridor which runs along the southern project boundary. This biological corridor would include FMZ buffers, as well as retained agriculture, the total width of which would vary between 150 and 500 feet. AA areas 10 through 13 are analyzed further as follows:

- AA 10 is located along the western project boundary of Phase 5 adjacent to active orchards, which are subject to aerial spraying (Figure 2.4-7h). Single-family residential uses are proposed adjacent to the off-site orchards. Notwithstanding the proposed FMZ that would be required for fire protection, the adjacency of off-site operation represents a **significant impact** at this location (**Impact AG-10**).

- AA 11 is adjacent to off-site orchards while AA 12 adjoins off-site estate residential uses. The entire southern boundary of Phase 5 includes an east-west trending biological open space corridor (with some retained agriculture along the periphery). The width of this corridor varies from approximately 150 feet to 500 feet and would serve to ensure that indirect impacts would be **less than significant** for AA 11 and AA 12.
- AA 13 is located along the eastern project boundary of Phase 5. Residential and Institutional uses are proposed along the boundary of AA 13. There are nursery/greenhouse and flower crops ~~along~~ adjacent to AA 13, to the east of Phase 5 (Figure 2.4-7i). The nearest pesticide applications occur approximately 280 feet from the project boundary. With respect to indirect impacts to this flower operation from the project; lighting would be required to be shielded and directed away from the off-site parcels (Specific Plan Section 3.D.10). However, the adjacency of off-site operations represents a **significant impact** at this location (**Impact AG-11**).

Phase 5 includes biological open space along its southern boundary and FMZ areas around the remainder of its perimeter. The retention of the biological open space along the southern boundary would be sufficient to ensure that impacts relative to AAs 11 and 12 are less than significant. The western boundary is adjacent to orchard uses and eastern boundary abuts flower crops. Therefore, **significant impacts** would occur within AAs 10 and 13.

Interim Phasing

During the phased build-out of the project, the applicant/owner intends to continue leasing the property to farmers who operate the existing orchard and field crop operations throughout the project site. The potential adjacency issues which could occur during this interim period would represent a **significant impact (Impact AG-12)**.

Other Compatibility Issues

Stormwater Runoff

Although current regulatory requirements protect off-site properties (e.g., National Pollutant Discharge Elimination System [NPDES]) from this type of indirect impact; this can still be an issue for agricultural operators. Urban runoff can contain pollutants and other chemicals (e.g., lawn fertilizer/pesticides) that can damage some crops. Further, some crops can be damaged from too much irrigation water or water with high levels of TDS. The project was required to address these impacts through engineering documents and studies. The project's hydrology documents (see Appendices U-1, U-2, and U-3) provide calculations of anticipated increases of flow volumes and hydromodification measures to be employed by the project to reduce and eliminate potential impacts associated with project runoff. Through the incorporation of the requisite LIDs, BMPs, and hydromodification design features, ~~runoff~~ potential compatibility impacts associated with stormwater runoff would be **less than significant**.

Hazardous Materials Storage

Any on-site storage of fuels or pesticides for use, within agricultural areas, whether long-term or in the interim during phasing, could result in significant impacts associated with homeowner complaints about hazardous materials storage practices by the adjacent farmers. This could also occur during interim phases where on-site agricultural operations could continue adjacent to new residents. Maintenance of on-site orchards would be regulated through provisions within the Master Covenants Conditions and Restrictions for the community. Such regulations would include an on-site ban on aerial pesticide spraying, restrictions on the types of fertilizers that could be used, and limitations on the types of equipment and hours of operation of maintenance activities. All pesticide and hazardous materials storage, on- or off-site would be required to comply with the state requirements and the applicable regulations enforced by the County Agriculture Weights and Measures. Notwithstanding storage protection measures and regulatory compliance, **significant impacts** could occur along the AAs identified above (**Impact AG-13**).

Invasive Pests and Pets

Adjacent development could affect existing agricultural operations through the introduction of new pests and domestic pets. The Specific Plan addresses management of common area fruit trees to ensure they are managed to avoid breeding of pests that could cause economic damage to agricultural crops in the surrounding area. Refer to Specific Plan, Part III, section M.15.k and Table 1-2, Project Design Considerations. However, Non-native or invasive pests and pets from non-HOA managed areas can damage adjacent agriculture operations or be a costly nuisance to the farmer representing a significant impact (Impact AG-14).

Pathogens/Diseases

The on-site equestrian trails, and use of trails by domestic animals, could result in the spread of disease onto existing agricultural operations representing a **significant impact (Impact AG-15)**.

Air Contaminant Generation

Particulate matter and other contaminants can be one of the most common issues when it comes to non-agricultural uses generating complaints about standard operating procedures, for the adjacent agricultural operator. These complaints can introduce pressures on the agricultural operator. PM generation can also be generated during construction of the project which could affect adjacent agricultural operations (e.g., flower crops). Standard PM control measures would be required during construction which would address short-term impacts. In the long-term and interim condition, both the on-site and the adjacent off-site agricultural uses consist of primarily orchards and flower/nursery operations, which are not known to be substantial dust or air pollutant generators (pesticide use is addressed above separately). Impacts would be **less than significant**.

Night time Lighting

New development can be a source of night time lighting, which can affect the growth patterns of greenhouse crops. There are greenhouses located within the NAP parcel adjacent to Phase 2 and off-site approximately one-third of a mile to the east of the project site. With respect to indirect impacts to this flower operation from the project; lighting would be required to be shielded and directed away from the off-site parcels (see Specific Plan Section 3.D.10). The proposed project would also include a lighting plan that would conform to the San Diego Light Pollution Code. Lights would be shielded to prevent glare onto neighboring roadways and adjacent open space. Additionally, project outdoor lighting would be fully shielded and restricted to 4,050 lumens in conformance with the Light Pollution Code Zone B requirements. With respect to indirect impacts to new residential uses from agricultural operations (potentially generating nuisance complaints); the adjacent orchards and flower fields are not artificially lit at night and the nearest agricultural structure to the project boundary, which may be lit (e.g., greenhouse/nursery) is approximately 240 feet away. Impacts would be **less than significant**.

2.4.3 Cumulative Impact Analysis**2.4.3.1 Issue 1: Direct Conversion of Agricultural Resources**

A list of cumulative projects with a summary of project features is provided in Table 2.4-5 and shown in Figure 2.4-8.

Cumulative Impacts to Important Farmland

As discussed in the General Plan EIR, agricultural acreage within the County has been in decline since at least 1984 due to pressures on agriculture, such as high land values, urban/agricultural interface conflicts, and high economic costs (water costs). While the types of farming occurring in San Diego (small acreage - high value crops) allow San Diego farmers to continue economically viable operations; agriculture is a vital part of the San Diego County economy. Further, the cumulative loss of farmland is a concern to both the state and nation.

As shown on Figure 2.4-8 and in Table 2.4-6, based on the Statewide FMMP Important Farmland mapping designations, the 12 cumulative projects together contain 431.9 acres of Important Farmland (not including "Other Land" which is a catch-all category that the FMMP does not consider to be Important Farmland), and the project combined with the 12 cumulative projects results in impacts to a total of 943.5 acres of Important Farmland within the cumulative study area. The project's impacts to Important Farmland (Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance) totals 511.7 (again excluding "Other Land") acres, representing 54 percent of the cumulative total of Important Farmland. A regional study area was also analyzed with respect to cumulative agricultural impacts (see Figure 1-24). With respect to the regional cumulative study area, there is a total of 5,627 acres of important farmland (or 3,557 excluding Other Land); and the project's impacts would represent conversion of 11 percent of the study area total (or 14 percent if excluding Other Land). As the preceding analysis is based on the designations provided by the FMMP Important Farmland maps and not the FMMP soil quality listings, which are the designations utilized by the County in assessing cumulative impacts, the preceding analysis is

presented for information purposes only. (See County Guidelines Section 4.2.4 [the guidelines for determining the significance of cumulative impacts are based on the same guidelines used to determine the significance of project level impacts].)

In light of the ~~aforementioned percentages and the~~ LARA model result indicating the site is an ~~important~~ significant agricultural resource; the project's incremental contribution to a Countywide loss of Important Farmland in the form of, ~~coupled with~~ the on-site loss of 43.8 acres of soils of Prime or Statewide Importance would be considered **cumulatively considerable (Impact AG-16)**.

**TABLE 2.4-6
ACRES OF FMMP FARMLAND WITHIN THE CUMULATIVE PROJECT AREA
(STATEWIDE MAPPING SYSTEM DESIGNATION)**

Category	Project Acres	Cumulative Projects	Total Cumulative	Regional Cumulative Study Area Total	County-wide Total
Other Land*	95.9	12.6	108.5	2,070	1,452,699
Farmland of Local Importance	146.3	62.1	208.4	1,124	153,187
Prime Farmland	0.0	0.1	0.1	24	7,753
Unique	329.2	365.5	694.7	2,305	51,975
Farmland of Statewide Importance	36.2	4.2	40.4	104	10,411
TOTAL	607.6	444.5	1,052.0	5,627	1,676,025

*Other Land is not considered by the CDC to be "farmland" as it is generally a catch-all category for those lands that do not fit into any other category.

2.4.3.2 Issue 2: Land Use Conflicts

None of the projects in the cumulative study area are identified as having direct project impacts to a Williamson Act Contract or as being located within an agricultural preserve. These cumulative projects would also not indirectly impact Williamson Act Contract lands or agricultural preserves. As discussed above, the project includes several mitigation measures and planning design considerations to ensure that the project would have a less than significant impact with respect to land use conflicts; these same measures (see subchapter 2.4.5 below) would ensure that the project's incremental contribution toward a cumulative impact would not be cumulatively considerable ~~be less than significant~~. Therefore, the cumulative impact to Williamson Act Contract lands and agricultural preserves would be **less than significant**.

2.4.3.3 Issue 3: Indirect Conversion of Agricultural Resources

Cumulative impacts related to farmland conversion could also result from edge effects, including trespassing, pilfering of crops, and damaged farm equipment. The pressure, inconvenience, and increased costs of operating remaining farms in areas converting to other uses may render continued farming infeasible or, at least, heighten the attractiveness of selling other farms for development. However, as discussed in subchapter 2.4.5 below, the edge (indirect) impacts associated with this project will be reduced to a level that is less than significant with the implementation of Mitigation Measures **M-AG-2** (agricultural buffer), ~~and~~ **M-AG-3** (fencing), **M-AG-4** (limited building zones) ~~(including fencing)~~ and the project design considerations proposed for this project

(see Table 1-3). The cumulative projects having similar indirect impacts as the project would be required by the County to implement similar measures (i.e., walls and buffers) to reduce their urban/agriculture interface impacts. Thus, each cumulative project would mitigate their own incremental contribution toward a cumulative impact and the project, even when considered in conjunction with the cumulative projects identified in Table 1-5, would **not contribute to a cumulatively considerable indirect impact**.

2.4.4 Significance of Impacts Prior to Mitigation

As discussed above, no significant impacts would result from the project in association with Williamson Act Contracts. The following significant impacts would occur with project implementation:

- Impact AG-1:** Pursuant to the County's LARA Model, portions of the project site were found to be an important significant agricultural resource. ~~Therefore,~~ the project would result in significant direct impacts through the direct conversion of 43.8 acres of Prime and Statewide Important soils.
- Impact AG-2:** The project would result in a significant adjacency issue associated with the on-site park (P-10), also identified as AA 6.
- Impact AG-3:** The project would result in a significant adjacency issue associated with the institutional site (AA 13).
- Impact AG-4:** The project would result in a significant adjacency issue associated with the age restricted area within Phase 4, also identified as AA 8.
- Impact AG-5:** The project would result in a significant adjacency issue associated with AA 3.
- Impact AG-6:** The project would result in a significant adjacency issue associated with AA 4.
- Impact AG-7:** The project would result in a significant adjacency issue associated with AA 5.
- Impact AG-8:** The project would result in a significant adjacency issue associated with AA 7.
- Impact AG-9:** The project would result in a significant adjacency issue associated with AA 9.
- Impact AG-10:** The project would result in a significant adjacency issue associated with AA 10.
- Impact AG-11:** The project would result in a significant adjacency issue associated with AA 13.
- Impact AG-12:** The project would result in a significant adjacency issue associated with interim on-site agricultural activities.

Impact AG-13: The project would result in a significant on and off-site adjacency issue associated with storage of hazardous materials.

Impact AG-14: The project would result in a significant adjacency issue associated with non-native pests or domestic pets.

Impact AG-15: The project would result in a significant adjacency issue associated with the spread of pathogens and disease.

Impact AG-16: The project would result in a cumulatively considerable contribution to the significant loss of Important Farmland.

2.4.5 Mitigation

M-AG-1: Pursuant to the County Guidelines (page 45) for direct impacts, a 1:1 mitigation ratio shall be required for impacts to Prime Farmland or Farmland of Statewide Importance. As part of the project design 23.8 acres of agriculture would be preserved within existing biological open space corridors (see Figures 13a and 13b of Appendix G). Therefore, the total acreage requiring mitigation is 43.8 acres and the applicant shall be required to implement one of the following options:

- A. The applicant shall purchase mitigation credits through the County's PACE program. The County's PACE program is an approved mitigation banking method which uses in-lieu fees to purchase PACE credits to offset agricultural impacts. Each acre of land permanently protected with an agricultural conservation easement under the PACE program would equate to one mitigation credit. Therefore, the applicant shall mitigate for the 43.8 acres of Prime and Statewide important soils impacted, at a 1:1 ratio, through the purchase of 43.8 mitigation credits. The credits shall be purchased prior to the issuance of a grading permit.
- B. In the event that PACE credits are unavailable or the applicant elects not to participate; the applicant may choose to independently secure conservation easements. The conservation easement shall prohibit non-agricultural uses and must include Prime and Statewide important soils of equal or better quality compared to the soils being converted at a 1:1 ratio (43.8 acres). The conservation easements shall be located within the cumulative project area, or, at a location approved by the Director of P&DS. The applicant shall grant the easement in perpetuity to the County prior to the issuance of a grading permit.
- C. The applicant may choose to mitigate for 43.8 acres of Prime and Statewide Important soils through a combination of options A and B so long as the total acreage of mitigation is equal to a 1:1 ratio (43.8 acres) and occurs on soils of equal value to those being converted. The applicant shall provide proof to the County that the mitigation has been implemented prior to the issuance of a grading permit.

M-AG-2: A 50-foot-wide agricultural buffer planted with two rows of the appropriate tree crop (e.g., citrus, avocado) shall be provided. This buffer shall be located where residential uses in the project would abut existing, adjacent orchards and other agricultural operations in order to create a transition between the two uses, and as illustrated in FEIR Figures 2.4-7a through 2.4-7i, incorporated by reference and made a part of this mitigation measure. This buffer shall be required at impact locations AG-2 through AG-11 and AG-13 through AG-15, with the exception that AG-5 (AA 3), AG-6 (AA 4), AG-9 (AA 9), and AG-3 (AA 13) would provide less than two rows of trees due to site constraints as detailed in Figures 2.4-7a, 2.4-7b, 2.4-7g, and 2.4-7i.

Specific to the agricultural buffer provided in AA 6 (Impact AG-2), Canary Island Pines shall be planted among the tree crops to further reduce any potential pesticide drift that may occur between the existing adjacent agricultural use and the proposed project's park and school sites. The Canary Island Pine is a fast-growing pine that grows 60 to 80 feet tall, has needles (which are more efficient at removing small drifting droplets from the air than smooth leaves), and has low water needs. The pines shall be 36- to 48-inch boxed trees placed consistent with accepted practice that optimizes porosity and maximizes pesticide drift interception, with buffer density at approximately 30 to 50 percent and tree spacing at approximately 15 to 20 feet. All plantings shall be spaced in accordance with the County Fire Code.

M-AG-3: A 6-foot-high fence shall be maintained along the southern edge of the park (AG-2), the institutional site (AG-3), the age-restricted area (AG-4), and at the other project boundaries discussed above where compatibility impacts would require mitigation (AG-5 through AG-11), each as illustrated in FEIR Figures 2.4-7a through 2.4-7i, incorporated by reference and made a part of this mitigation measure. The fencing would also be required in order to prevent intrusion by people and domesticated pets and to reduce the chances of theft, spreading pathogens or diseases (AG-14 and AG-15 respectively). The fence shall be one of two types (refer to Exhibit 137 of the Specific Plan): (1) the solid masonry type with a foundation that extends below ground level and with no gaps; or (2) a combination of masonry and metal fencing with no gaps.

M-AG-4: A Limited Building Zone shall be established to prohibit habitable structures as well as any structure (e.g., covered patios and picnic shade structures, a community building, etc.) which could accommodate congregating residents, visitors, or children. The prohibition includes (but is not limited to) ball fields, swimming pools, horseshoe pits, picnic areas, or any other uses that would attract or keep people near the project boundary or AA. This prohibition would also apply to ~~This mitigation shall be implemented at the park site (AG-2), the institutional and age-restricted areas (AG-3 and AG-4) and along the project boundaries where it is necessary to discourage new residents from being within close proximity to off-site agricultural uses (AG-5, AG-6; and AG-8 through AG-11), each as illustrated in FEIR Figures 2.4-7a through 2.4-7i, incorporated by reference and made a part of this mitigation measure.~~ This LBZ would also serve to mitigate impacts AG-13, AG-14, and AG-15.

M-AG-5: ~~Pursuant to the Specific Plan Figure 142, the project shall include a~~An interim 100-foot fuel modification zone/limited building zone shall be required between ongoing agricultural uses and residential development; for each phase of development. The fuel modification zone/limited building zone shall comply with all state law and county agricultural, weights and measures regulations. In addition to the restriction of aerial pesticide application, which is stated in the Specific Plan, the limited building zone shall also limit pesticide use to only organic materials.

2.4.6 Conclusion

The project was analyzed pursuant to the County's LARA Model, and the project site was determined to be a significant agricultural resource. Accordingly, direct impacts result because the project would convert 43.8 acres of soils of Prime or Statewide Importance (Issue 1). Mitigation measure **M-AG-1** would require the applicant to purchase 43.8 acres of credits through the County's PACE program, or the equivalent. Mitigation through the PACE program (Option A), off-site mitigation of quality soils (Option B), or mitigation through a combination of the two options (Option C) would adequately mitigate for the project's direct impacts to agriculture by preserving physical agricultural resources for agricultural use in perpetuity. As the PACE program has been developed as an overall programmatic solution to address preservation of agricultural lands within the unincorporated area, the County has determined that 1:1 mitigation through purchase of PACE mitigation credits is adequate to mitigate the project's identified impacts. This 1:1 ratio is adequate because it also represents the preservation ratio recommended of agriculture pursuant to the County Agricultural Guidelines. Mitigation with Option B would also be adequate because it would require the land to contain soils of equal or greater quality within the cumulative project area or a location approved by the Director of PDS. Considering the number of acres required as mitigation, either option A or B or a combination of A and B would provide for a large enough acreage to ensure long-term agricultural viability. Viability is also ensured through the criteria for selection in the PACE program and the required approval of the mitigation location by the Director of PDS for Option B. In conclusion, M-AG-1 is adequate to reduce the identified significant direct impacts to agricultural resources.

The project was found to have a less than significant impact in association with agricultural zoning or Williamson Act conflicts (Issue 2); therefore, no mitigation was required for this issue area.

With respect to off-site Urban/Agricultural Interface Compatibility conflicts (Issue 3), the project's significant impacts would be reduced to less than significant with implementation of Mitigation Measures **M-AG-2** (Agricultural Buffer), **M-AG-3** (Fence), ~~and through~~ **M-AG-4** (LBZ), along with implementation of proposed project design considerations. Relevant project design considerations are discussed throughout this subchapter and detailed in Table 1-3.

County Guidelines recognize that there is no scientific literature available that provides guidance as to exactly what buffer widths are required for each type of compatibility impact; but buffers are nevertheless, the most important tool to minimize interface conflicts. In determining the appropriate buffer widths to be applied in this case, the County reviewed and considered relevant studies, and the site-specific conditions, including the Pennebaker report, "Agricultural Buffer Criteria for the City of Arroyo

Grande” as discussed further in the Agricultural Technical Report, Appendix F. Based on this literature review, the County has determined that the recommended mitigation measures are adequate. In particular, the Pennebaker study reports that minimum buffer widths can be as small as 10 feet, with maximum buffer widths ranging between 66 to 131 feet. The recommended mitigation measures would provide a minimum 50-foot agricultural buffer, including one to two rows of trees, and an additional buffer of varying widths through implementation of a LBZ. As shown in Table 2.4-7, the total buffer width at each AA where significant impacts were identified would range between 50 and 242 feet, where a vegetated buffer element is included. Given this range, the average recommended buffer width cited in the research addressed in the Pennebaker study is approximately 100 feet, assuming a vegetation buffer.

In this case, the recommended mitigation measures would provide a minimum 50-foot agricultural buffer, including one to two rows of trees, and an additional buffer of varying widths through implementation of a LBZ. As shown in the table below, the total buffer width at each AA where significant impacts were identified would range between 50 and 242 feet, with an average buffer width of approximately 100 feet. In addition, the resulting buffers would contain design elements advocated by all of the studies cited by Pennebaker including the use of trees, fences, trails, roadways, parks, and utility rights-of-way.

**TABLE 2.4-7
AGRICULTURAL ADJACENCY AREA BUFFER WIDTHS**

<u>Agricultural Adjacency Area #</u>	<u>Agricultural Buffer Width</u>	<u>Agricultural Limited Building Zone (LBZ) Width*</u>	<u>Total Width</u>
<u>AA 3</u>	<u>50'</u>	<u>20'</u>	<u>70'</u>
<u>AA 4</u>	<u>50'</u>	<u>0-42'</u>	<u>50-92'</u>
<u>AA 5</u>	<u>50'</u>	<u>50'</u>	<u>100'</u>
<u>AA 6</u>	<u>50'</u>	<u>50'</u>	<u>100'</u>
<u>AA 7</u>	<u>50'</u>	<u>0-50'</u>	<u>50-100'</u>
<u>AA 8</u>	<u>50'</u>	<u>50'</u>	<u>100'</u>
<u>AA 9</u>	<u>50'</u>	<u>50'</u>	<u>100'</u>
<u>AA 10</u>	<u>50'</u>	<u>50-192'</u>	<u>100-242'</u>
<u>AA 13</u>	<u>50'</u>	<u>50'</u>	<u>100'</u>

*Width of Agricultural LBZ where it serves to extend the total buffer width; does not include any portions which may overlap with the agricultural buffer. Note, the agricultural and fire LBZ are identified on separate figures and are not identical due to their different purposes.

Figures 2.4-7a through 2.4-7i illustrate the width of the agricultural buffer, including rows of trees and width of LBZ, and the location of the six-foot-high fence relative to each AA where potentially significant impacts are identified. The combination of mitigation measures would work together to preserve the agricultural character of the project area and protect on-site land uses from adjacent agricultural activities, as well as provide for visual transitioning between existing agricultural operations and the project’s proposed land uses. The mitigation measures also would serve to protect the off-site agriculture

operations from the previously mentioned “edge effects” that can arise when residents from the project complain about potential nuisances such as noises, odors, and dust.

Mitigation Measure **M-AG-2** would be implemented at AAs 3 through 10 and 13 and would reduce significant adjacency impacts by creating adequate buffer between off-site agricultural activities and on-site uses. Refer to Figures 2.4-7a through 2.4-7i for details of the mitigation measures proposed for each AA. For **Impact AG-5** (AA 3), with implementation of this mitigation, the 30-foot half-width of the road/utility easement ~~would combined with the two~~ rows of orchard trees, would make up ~~with~~ the 50-foot agricultural buffer on-site in addition to the 20-foot agricultural LBZ, to create a total buffer of ~~80-70~~ feet. At **Impact AG-6** (AA 4), a 50-foot agricultural buffer and a 20- to 42-foot LBZ in the areas adjacent to proposed on-site residential uses provides adequate buffering from off-site land uses. Measure M-AG-2 further requires that the AA-6 agricultural buffer be planted with Canary Island Pines among the tree crops in order to provide an additional buffer between the existing adjacent agricultural use and the proposed park and school sites. The Canary Island Pine is a fast-growing pine that grows 60 to 80 feet tall, has needles (which are more efficient at removing small drifting droplets from the air than smooth leaves), and low water needs. The mitigation measure requires that the pines be placed in a manner that optimizes porosity and maximizes pesticide drift interception. For this AA, two rows of trees are provided except where site constraints exist. At **Impact AG-7** (AA 5) and **Impact AG-4** (AA 8), the combination of the 50-foot agricultural buffer (with two rows of trees) in conjunction with the ~~400~~50-foot LBZ and a 6-foot fence results in ~~450-100~~ feet of separation between the off-site orchards and the on-site uses. For **Impact AG-2** (AA 6), the off-site property includes the half width of the 40-foot road/utility easement along Covey Lane that is not included in the buffer width. Therefore, the combination of the agricultural buffer, the LBZ, and the portion of the Covey Road easement within the project site provides a total of ~~424-100~~ feet of separation between on-site uses and off-site agriculture.

A ~~400-foot~~ LBZ up to 50 feet in width (**M-AG-4**) supplements the 50-foot agricultural buffer along 1,122 linear feet (out of 2,159 feet total) at **Impact AG-8** (AA 7) creating a ~~50- to 450~~100-foot buffer at this AA. Implementation of mitigation measures listed above would provide adequate separation between the on and off-site uses to assure compatibility and neither would impact the other. With this mitigation, impacts would be reduced to less than significant at these locations.

For **Impact AG-9** (AA 9) mitigation **M-AG-2** would provide a single row of trees (instead of two), staggered on each side of the new Covey Lane alignment as shown on Figure 16g of the Agricultural Resources Report (see Appendix F). However the overall agricultural buffer would be 50 feet, in addition to a 50-foot LBZ. Due to the aAdditional separation of uses would be afforded by the improvement of Covey Lane and the width of the existing Covey Lane, although this width is not included in the total 100-foot buffer width as it is an off-site land use. In total, there would be a ~~total~~ separation of 100 ranging from ~~106 to 139~~ feet, which would provide adequate buffering.

At the location of impact **AG-10** (AA 10), there is an SDCWA easement which ranges from 20 to 120 feet in width and a 20-foot VCMWD easement. Furthermore, the LBZ (**M-AG-4**) angles to the northeast because of the 20-to 40-foot roadway easement for Nelson Road. **M-AG-2** also would be implemented south of the existing easements to provide buffering with two rows of orchards. In places, the total separation between land uses along **Impact AG-10** is over 200 feet wide but is no less than 100 feet wide where proposed on-site uses would be adjacent to orchards that are aerially sprayed. In

addition, M-AG-3 would require a 6-foot-high fence where residences are proposed near off-site orchards.

Impact AG-3 is associated with potential land use impacts related to the Institutional site. The impact area corresponds with AA 13, located along the eastern project boundary adjacent to the Institutional site. Impacts along these boundaries would be addressed by the same mitigation measures as Impact AG-11, discussed below.

For Impact AG-11 (AA 13), an agricultural buffer of 50 feet (M-AG-2) would include one row of trees instead of two due to restrictions from planting within the existing utility easement. A LBZ (M-AG-4) of 50 feet would provide additional buffering between land uses. In addition, a fence (M-AG-3) would be installed on the east side of Rodriguez Road between the adjacent, existing agricultural operations and the proposed residential development. Therefore, the total buffer in this area would be 100 feet wide, including one row of trees, a fence, and a public road and, therefore, would adequately separate land uses.

County Guidelines recognize that there is no scientific literature available that provides guidance as to exactly what buffer widths are required for each type of compatibility impact; but buffers are nevertheless, the most important tool to minimize interface conflicts. ~~This m~~Mitigation measure **M-AG-2** would also serve to reduce impacts associated with hazardous materials storage, non-native pests and pets, and spread of pathogens. Therefore, **M-AG-2** would reduce significant impacts at **AG-2** through **AG-11** and **AG-13, AG-14, and AG-15** to below a level of significance. Mitigation Measure **M-AG-3** requires the maintenance of a 6-foot-high fence in order to mitigate for impacts **AG-2** through **AG-4, AG-6 through AG-11** and **AG-13, AG-14, and AG-15**. The fence shall be restricted to one of two types (refer to Exhibit 137 of the Specific Plan): (1) the solid masonry type with a foundation that extends below ground level and with no gaps; or (2) the type that is a combination of masonry and metal fencing. This mitigation measure would serve to create a barrier to prevent trespass and intrusion by domesticated pets at these locations resulting in the reduction of the significant adjacency impacts to less than significant.

Mitigation Measure **M-AG-4** would place an LBZ that restricts the placement of structures. This mitigation measure would prohibit all structures and attractive features (e.g., gazebos, sheds, decks), as opposed to just habitable structures, resulting in the reduction of the significant adjacency impacts **AG-2** through **AG-6; AG-8 through AG-11; and AG-13, AG-14, and AG-15** to less than significant.

Mitigation Measure **M-AG-5** is enforceable through the Specific Plan and ensures that interim agricultural uses, as the project is phased in over time, would not result in significant indirect impacts (**Impact AG-12**). Interim on-site agricultural operations will be subject to lease agreements prohibiting aerial pesticide spraying and will take additional precautions to minimize other impacts (both to and from future residents) including noise and dust generation, trespassing, and vandalism.

Details of the location of each mitigation measure associated with each agricultural adjacency area are illustrated on Figures ~~2.4-746a through 2.4-746i~~ of the ~~agricultural resources report (see Appendix F)~~. No other mitigation is required for agricultural adjacency control. Implementation of mitigation measures **M-AG-2** through **M-AG-5** would assure that all significant compatibility-related agricultural impacts would be reduced to less than significant.

Cumulative impacts were discussed in subchapter 2.4.3 above, and were analyzed based on the same Issues 1, 2, and 3 discussed for direct/indirect impacts. The analysis identified a cumulatively considerable impact (**Impact AG-16**) associated with the direct conversion of agricultural resources. With respect to Issue 2, the project would be consistent with zoning regulations and would not affect any Williamson Act Contract or Agricultural Preserves. Therefore, the project would not result in a significant contribution to any cumulative land use impact. With respect to Issue 3, indirect impacts associated with this project would be reduced to a level that is less than significant with the implementation of mitigation measures M-AG-2 (agricultural buffer), and M-AG-3 (fencing), M-AG-4 (limited building zones) (including fencing) and the project design considerations proposed for this project (see Table 1-3). Therefore, the project would mitigate for any incremental contribution toward a cumulative impact and would not contribute to a cumulatively considerable indirect impact.

The project generates significant indirect adjacency impacts (**AG-2 through AG-15**), but these are mitigated through Mitigation Measures **M-AG-2 through M-AG-5** that require agricultural buffers for off-site and interim agricultural uses, fencing and limited building zones to restrict incompatible uses near agriculture. Any Cumulative projects with similar impacts would be required to address potential impacts associated with agricultural compatibility and indirect conversion and mitigate in a similar fashion; thus, no significant cumulative impacts associated with agricultural adjacency would result. However, the project was determined to be an important agricultural resource and would have a direct impact to 43.8 acres of soils of Prime or Statewide Importance (as discussed in Issue 1). The project's mitigation at a 1:1 ratio, including participation in the PACE program which This 1:1 ratio is adequate because it represents preservation of agriculture pursuant to the County Agricultural Guidelines. supports the County's efforts to implement a programmatic solution to address preservation of agricultural lands within the unincorporated area. While the 1:1 mitigation would mitigate the project's direct impacts to agricultural resources, the project's participation in the PACE program further supports a programmatic solution to address the cumulative loss of farmland and would therefore mitigate the project's contribution to a significant cumulative impact. Therefore, †The project's incremental contribution toward the cumulative loss of Prime or Statewide Importance soils county-wide would be significant and mitigated participation in the PACE program, as implemented by M-AG-1. (**Impact AG-16**) and require implementation of the same mitigation measure as for Issue 1 (**M-AG-1**).

**TABLE 2.4-1
ON-SITE SOIL RESOURCES
FMMP SOIL CANDIDATE LISTING DESIGNATION**

Soil Map Unit	Project Acres	Available for Agriculture Use	Unavailable for Agriculture Use	Proportion of Site Available	Prime or Statewide 1 for Yes; 0 for No	Matrix Score
Bonsall sandy loam, 9 to 15 percent slopes, eroded [^]	7.15	7.15	0.220	0.018	1	0.018
Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes	168.73	115.88	52.85	0.289	0	0.000
Cieneba coarse sandy loam, 15 to 30 percent slopes, eroded	53.43	32.01	21.42	0.080	0	0.000
Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded	0.24	0.16	0.08	0.000	0	0.000
Cieneba rocky coarse sandy loam, 9 to 30 percent slopes, eroded	9.86	7.56	2.30	0.019	0	0.000
Fallbrook rocky sandy loam, 9 to 30 percent slopes	3.41	0.84	2.57	0.002	0	0.000
Fallbrook sandy loam, 15 to 30 percent slopes, eroded	210.14	148.80	61.34	0.371	0	0.000
Fallbrook sandy loam, 5 to 9 percent slopes, eroded [^]	32.59	27.382	5.21	0.068	1	0.068
Fallbrook sandy loam, 9 to 30 percent slopes, severely eroded	12.94	10.72	2.22	0.027	0	0.000
Greenfield sandy loam, 5 to 9 percent slopes*	4.46	1.38	3.08	0.003	1	0.003
Placentia sandy loam, 2 to 9 percent slopes [^]	10.20	9.9	0.3	0.024	1	0.024
Placentia sandy loam, 9 to 15 percent slopes, eroded	3.93	3.75	0.18	0.009	0	0.000
Steep gullied land	81.46	40.44	41.01	0.101	0	0.000
Visalia sandy loam, 2 to 5 percent slopes*	8.98	0.5	8.48	0.001	1	0.001
TOTAL	607.53	406.47	201.05	1		0.115

*Prime farmland soil.

[^]Farmland of statewide importance soil.

**TABLE 2.4-5
LILAC HILLS RANCH - CUMULATIVE PROJECTS EVALUATION
(FMP STATEWIDE MAPPING SYSTEM DESIGNATION)**

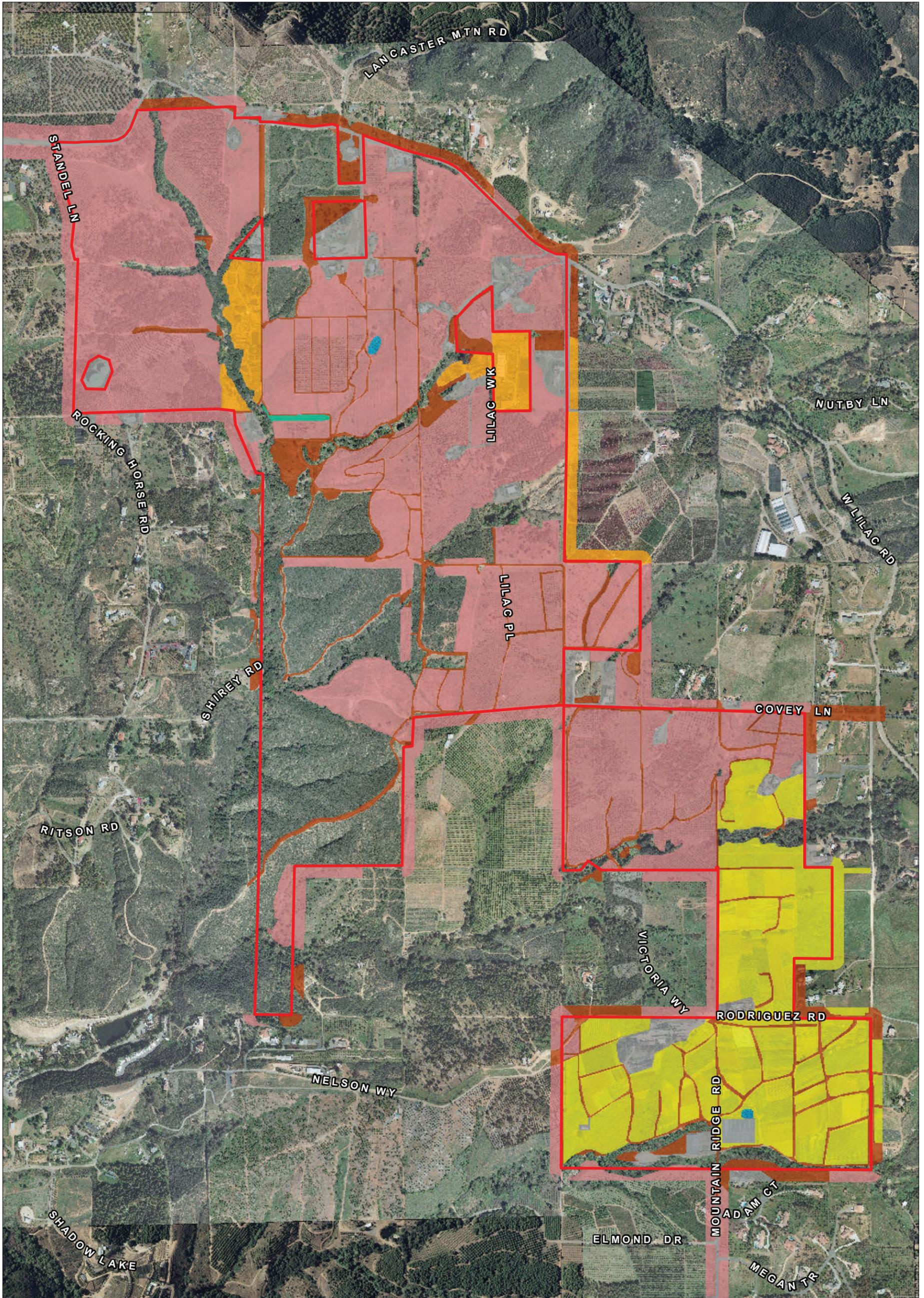
Project	Project Description	Important Agricultural Resources	Agricultural Impacts
SUKUP PRD TM5184	A tentative map for 9 lots on 24.62 acres, including open space easements and a limited building zone.	Includes 24 acres of orchards; 24 acres of Farmland of Local Importance and 0.5 acre of Unique Farmland.	Assumed to impact all 24 acres of orchard production as well as Unique and Locally Important Farmland.
DABBS TM 5346	Request for Tentative Map on 38.4 acres. The site is located on the west of Old Highway 395, east of Aqueduct Road, north of Via Urner Way.	Contains 38.4 acres of orchards; 37.8 acres of Unique Farmland, 0.16 acre of Other, and 0.13 acre of Prime Farmland.	It is assumed that all 38.4 acres of orchards are impacted as well as 37.8 acres of Unique Farmland.
MUSTAFA TPM 20811	A tentative parcel map for a minor subdivision of 4 lots and a remainder parcel on 16.4 acres.	Disturbed with existing residential uses; but is mapped as 12.2 acres of Unique Farmland and 4 acres of Farmland of Local Importance.	No agricultural production would be affected, but 12.2 acres of Unique Farmland and 4 acres of Farmland of Local Importance would be converted.
LILAC RIDGE TPM 20996	The project proposes to subdivide 16.3 acres into 3 lots for single-family home development.	Disturbed with existing residential uses; but is mapped as 16 acres of Unique Farmland.	No agricultural production would be affected, but it is assumed that all 16 acres of Unique Farmland would be converted.
GOODNIGHT RANCHOS, TPM 21001	Minor residential subdivision within the Valley Center Community Plan area. The project proposes to divide 5.0 acres into 2 parcels measuring 2.45 acres net each.	Contains approximately 5 acres of orchards, comprised of 1 acre of Farmland of Statewide Importance and 4 acres of Unique Farmland.	Assumed to impact all 5 acres of orchard production as well as Unique and Statewide Important Farmland.
PFAFF TPM 21016	TPM to divide a 7.79-acre parcel into three residential lots. The site contains an existing single-family residence on proposed Parcel 1 that would be retained.	Disturbed with existing residential uses; but is mapped as 8 acres of Unique Farmland.	No agricultural production would be affected, but it is assumed that all 8 acres of Unique Farmland would be converted.
GANGAVALLT PM 21101	Residential Tentative Parcel Map. The project proposes to divide 5.05 acres into 2 parcels.	Contains approximately 5 acres of orchards, comprised of 0.22 acre of Other and 4.83 acres of Unique Farmland.	Assumed to impact all 5 acres of orchard production as well as Other and Unique Farmland.
MARQUART RANCH TM 5410	9 SFR lots. Includes improvements to West Lilac Road and Mesa Lilac Road, and drainage improvements.	Contains 44.2 acres of orchards on Unique Farmland	Case assumes conversion of all 44.2 acres of orchards and Unique Farmland.
VC11	This Project Specific Request located within the sawtooth shape formed along the southern boundary of Phase 3.	Contains 3.3 acres of Farmland of Local Importance; 10 acres of Other Land; and 66 acres of Unique Farmland (orchards).	Any assumptions about Project Specific Requests would be speculative. The worst case scenario of complete conversion to non-agricultural uses is assumed.
VC20B	A Project Specific Request located adjacent to the western boundary of Phase 5 (AA 11)	Includes 2 acres of Farmland of Local Importance and 76 acres of Unique Farmland (orchards).	Complete conversion is assumed.
VC20A	This Project Specific Request is located immediately west of VC20B	Includes 16 acres of Farmland of Local Importance; 2 acres of Other Land and 59 acres of Unique Farmland (orchards).	Complete conversion is assumed.

TABLE 2.4-5
LILAC HILLS RANCH - CUMULATIVE PROJECTS EVALUATION
(FMMP STATEWIDE MAPPING SYSTEM DESIGNATION)
 (continued)

Project	Project Description	Important Agricultural Resources	Impacts
VC61	A small Project Specific Request located within a gap between Phases 4 and 5.	Contains 5.7 acres of Farmland of Local Importance (estate residential) and 3.8 acres of Unique Farmland (orchards).	Complete conversion is assumed.
VC54	This Project Specific Request is located along the eastern portion of Phase 3 and adjacent to AA 7	Includes 1 acre of Farmland of Local Importance; 3 acres of Farmland of Statewide Importance; and 51 acres of Unique Farmland (flower/nursery crops).	Complete conversion of existing flower/nursery uses is assumed.

*Project numbers listed in this table correspond to the project's geographic location depicted in Figure 1-24 of this document.

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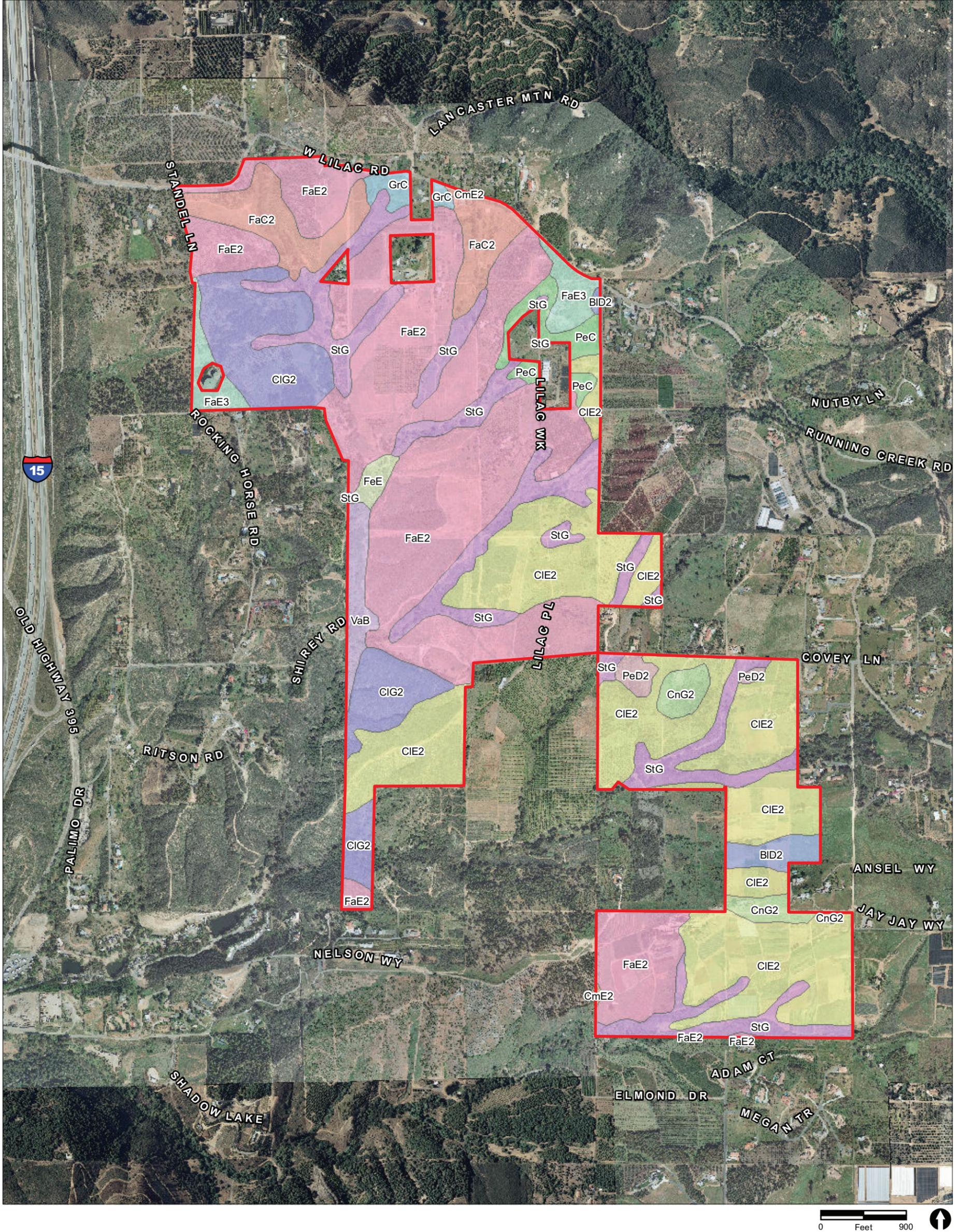


- | | |
|--|---|
| Project Boundary | Intensive Agriculture - Nursery (18200) |
| Agricultural Resources | Orchard (18100) |
| Open Water - Freshwater Agriculture Pond (64140) | Vineyard (18100) |
| Disturbed Habitat (11300) | Developed (12000) |
| Extensive Agriculture - Row Crops (18320) | |



FIGURE 2.4-1

Existing On-site Agricultural Resources



Project Boundary

Soil Classification

- BID2 - Bonsall sandy loam, 9 to 15 percent slopes, eroded
- CIE2 - Cieneba coarse sandy loam, 15 to 30 percent slopes, eroded
- CIG2 - Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded
- CmE2 - Cieneba rocky coarse sandy loam, 9 to 30 percent slopes, eroded
- CnG2 - Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded
- FaC2 - Fallbrook sandy loam, 5 to 9 percent slopes, eroded

- FaE2 - Fallbrook sandy loam, 15 to 30 percent slopes, eroded
- FaE3 - Fallbrook sandy loam, 9 to 30 percent slopes, severely eroded
- FeE - Fallbrook rocky sandy loam, 9 to 30 percent slopes
- GrC - Greenfield sandy loam, 5 to 9 percent slopes
- PeC - Placentia sandy loam, 2 to 9 percent slopes
- PeD2 - Placentia sandy loam, 9 to 15 percent slopes, eroded
- StG - Steep gullied land
- VaB - Visalia sandy loam, 2 to 5 percent slopes

FIGURE 2.4-2

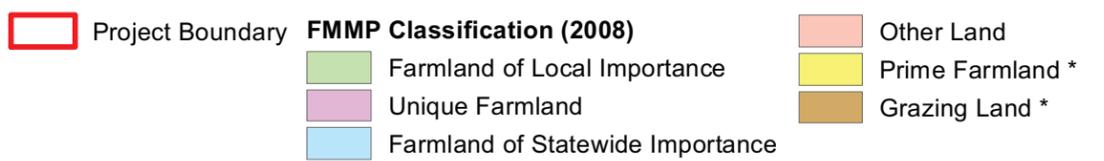
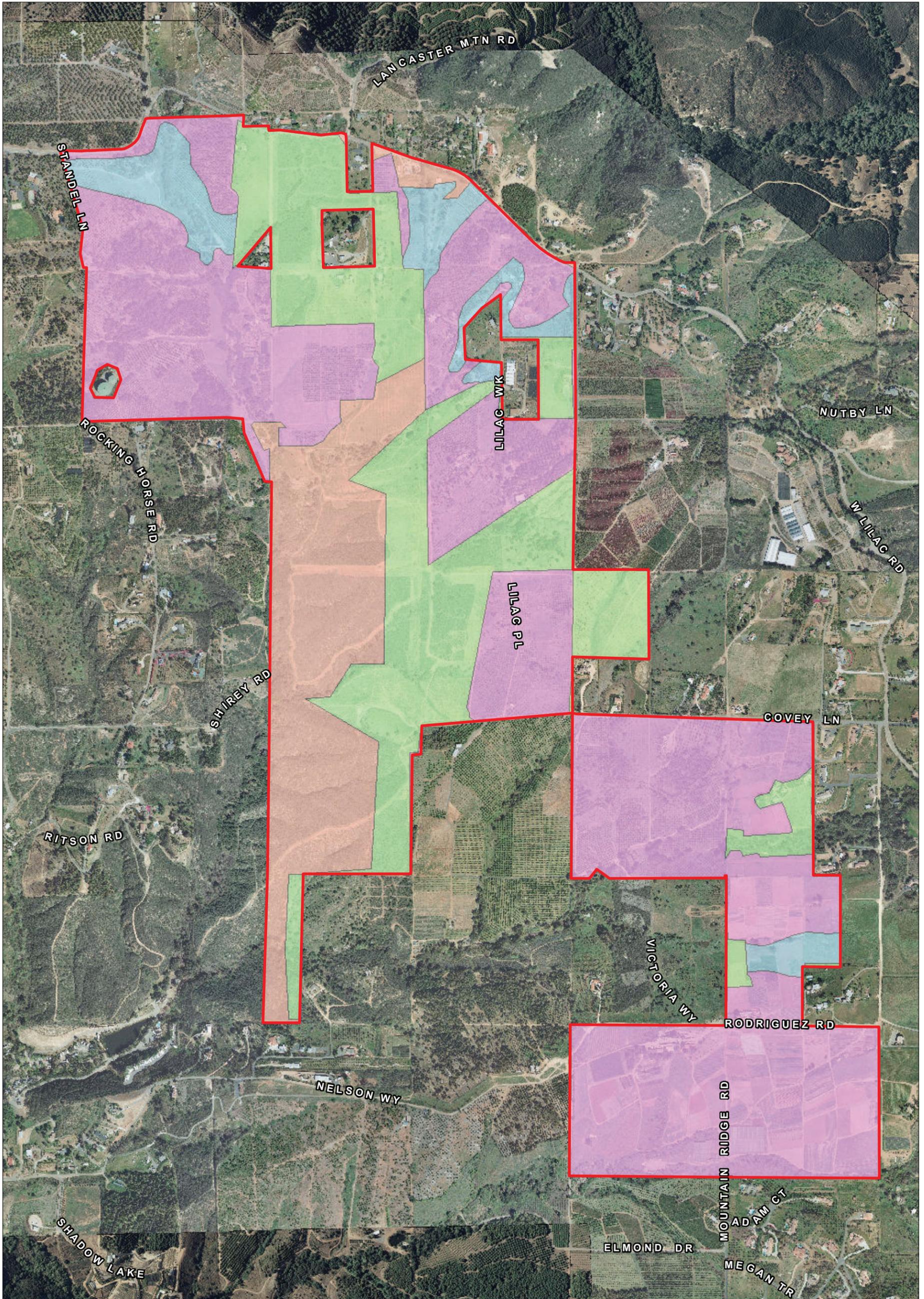
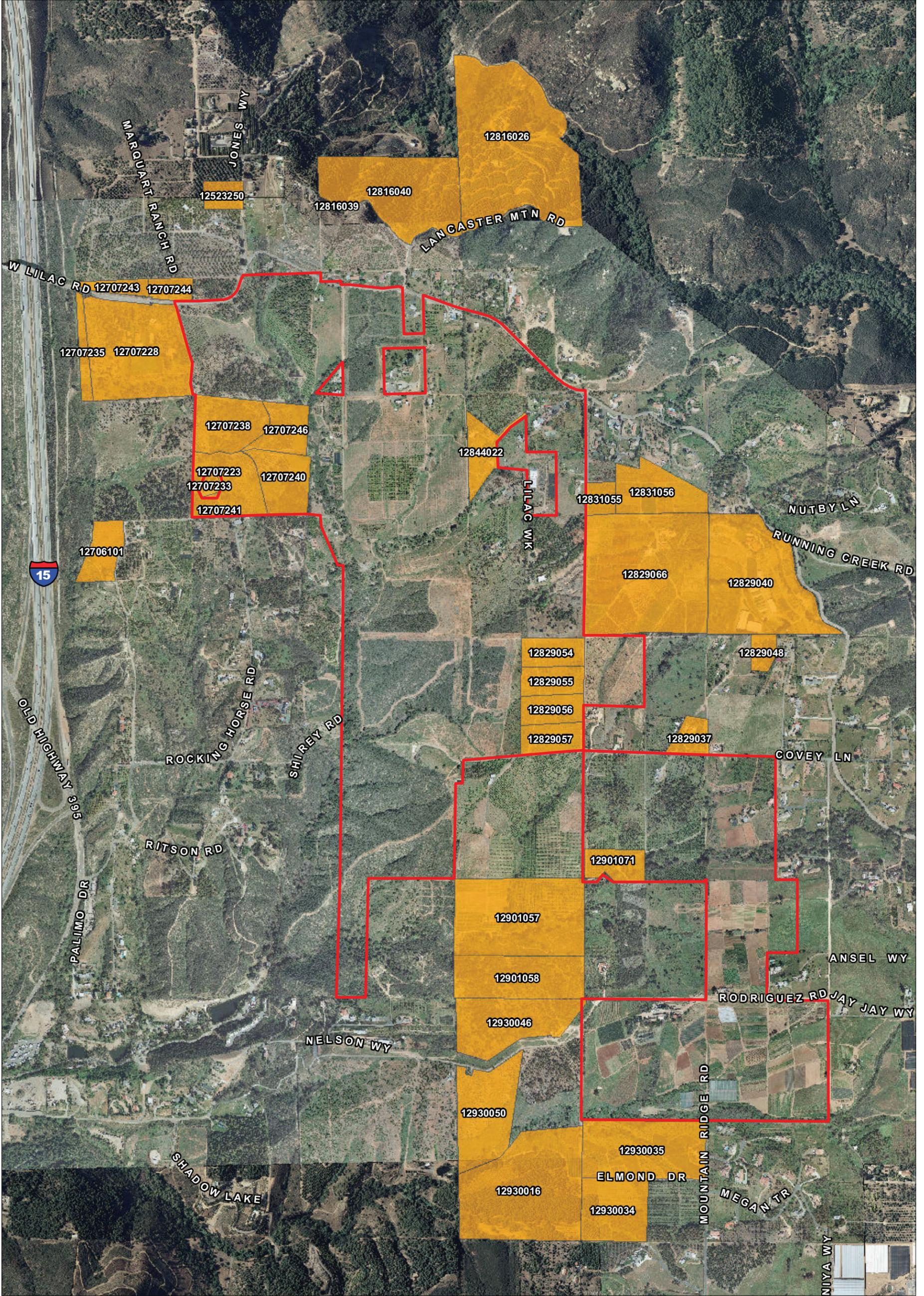


FIGURE 2.4-3

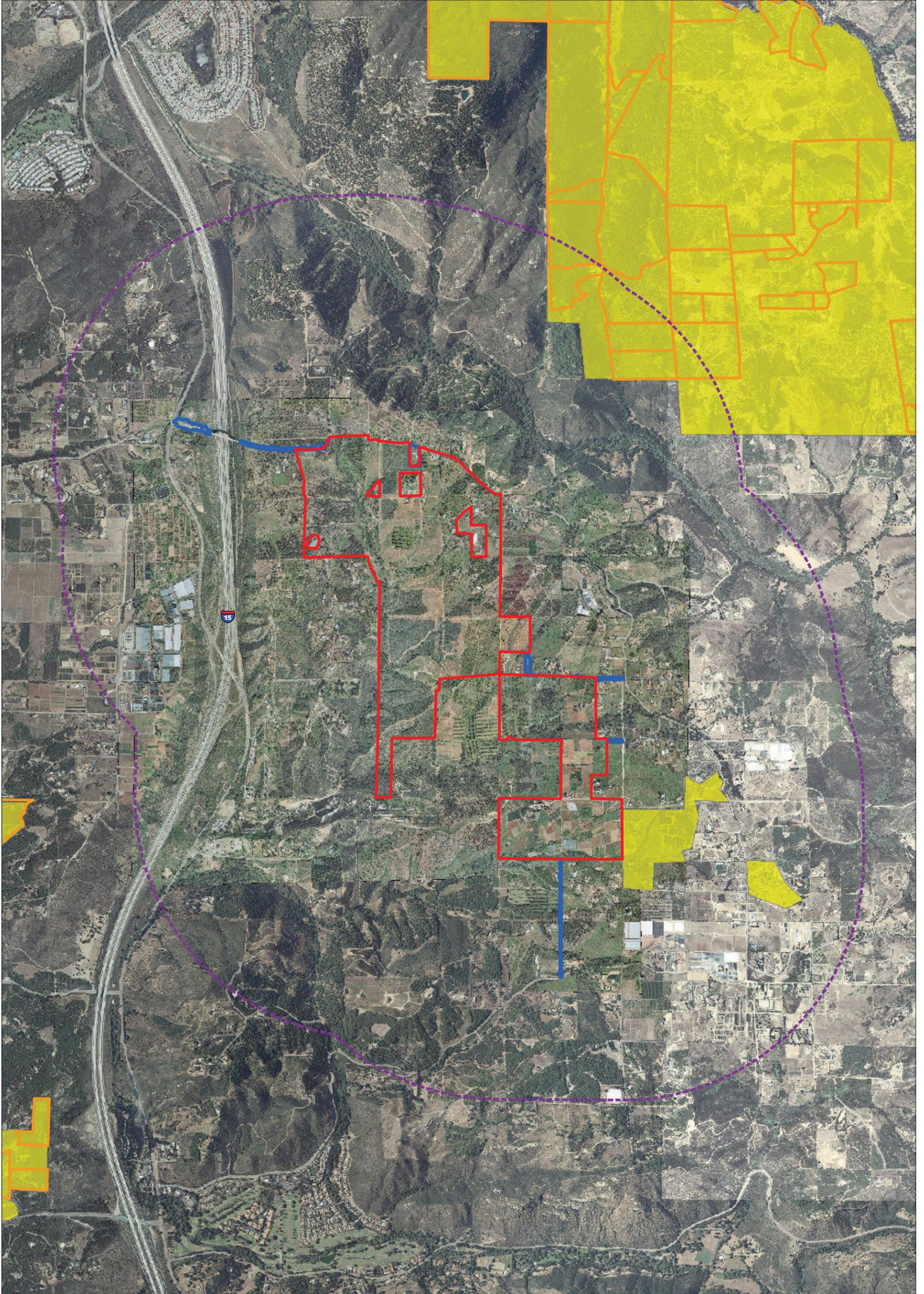
* None Present in Project Area



- Project Boundary
- Off-site Parcels with Pesticide Spraying Permits



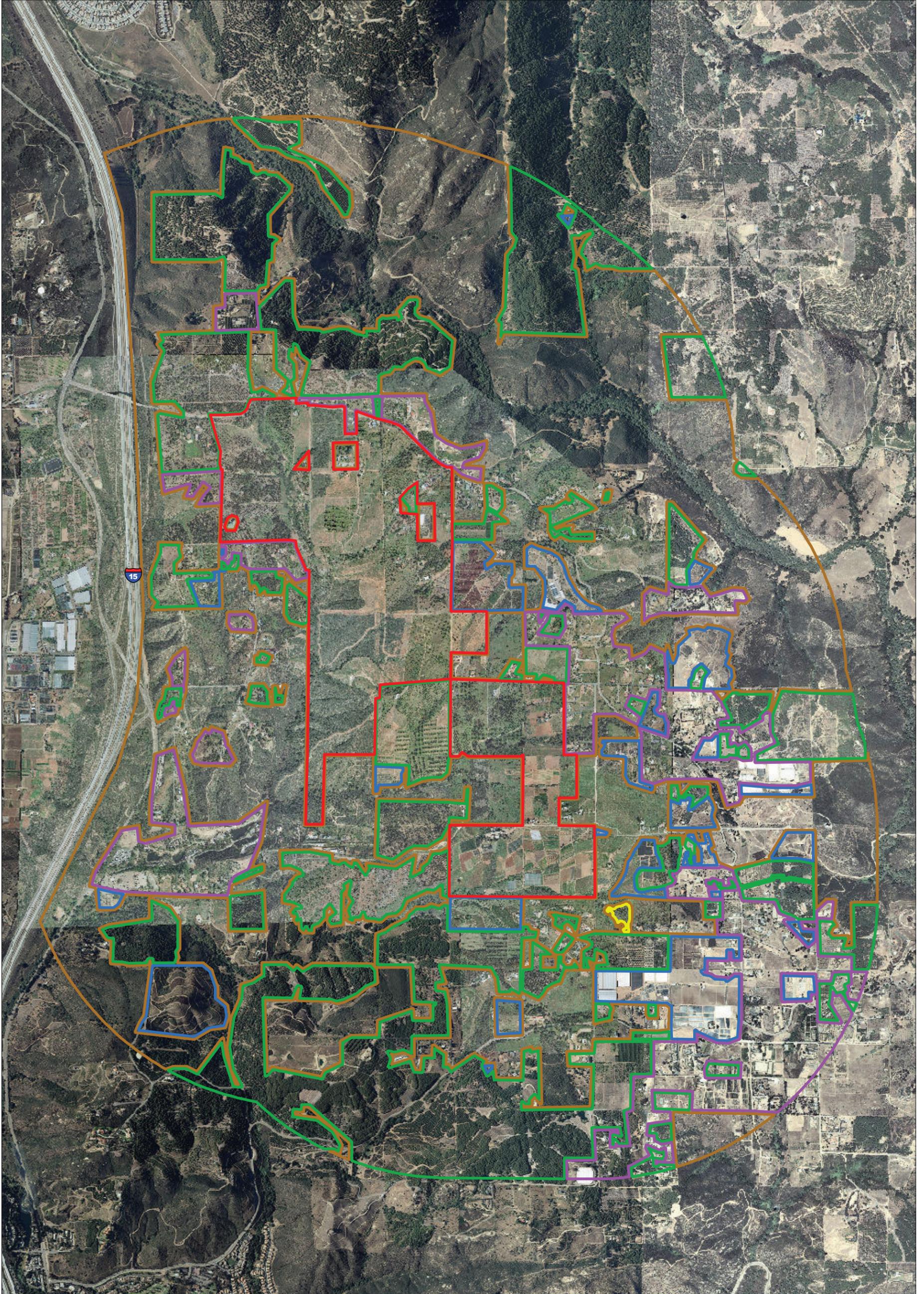
FIGURE 2.4-4



- Project Boundary
- 1-mile Buffer
- Off-site Improvement Areas
- Williamson Act Contracts
- Williamson Act Agricultural Preserves



FIGURE 2.4-5



- Project Boundary
- Off-site Agricultural Resources**
- Nursery and Greenhouse
- Row Crops
- Mixed-use Orchards
- Estate Residential
- Undeveloped



FIGURE 2.4-6

Off-site Agricultural Resources

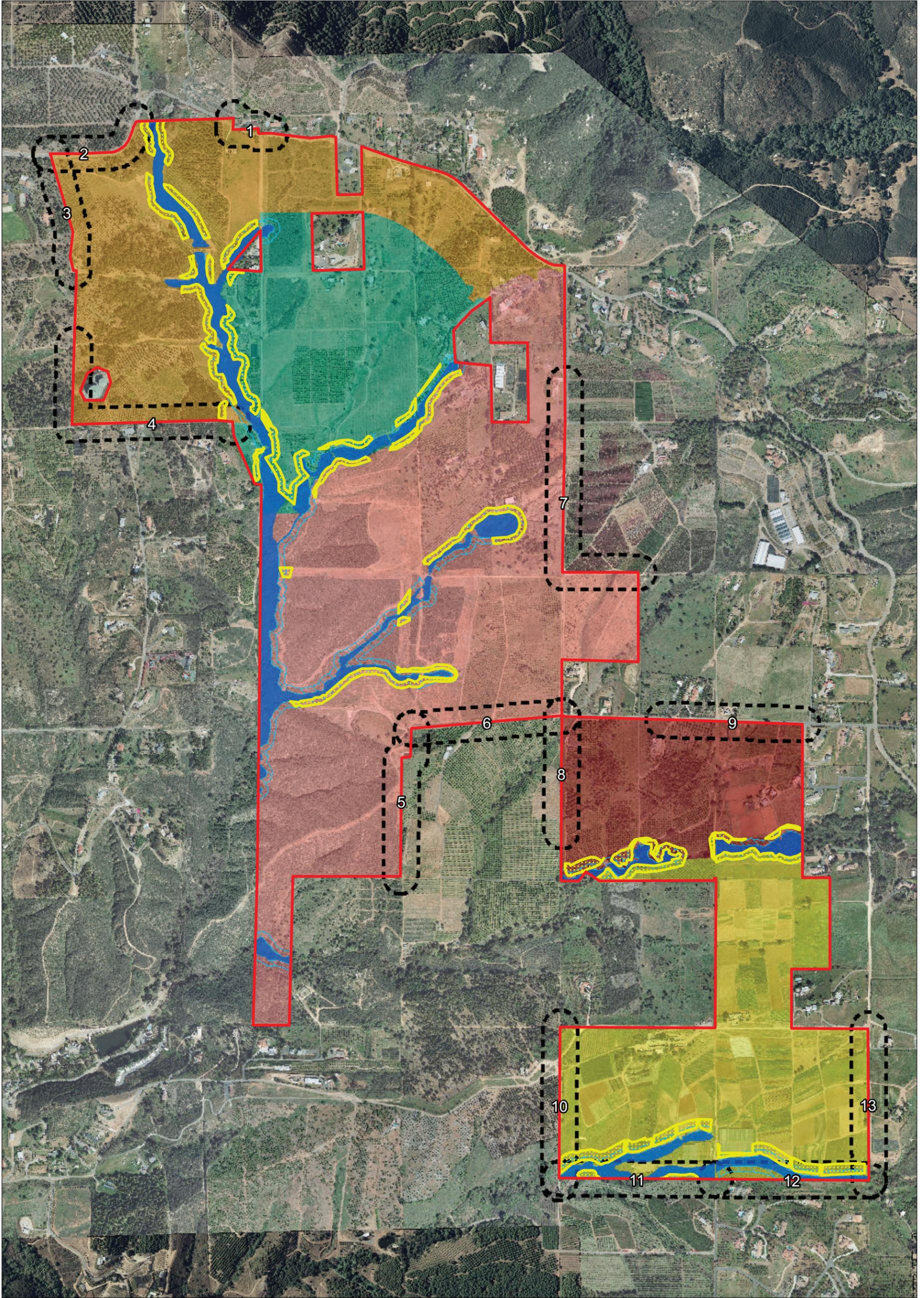


FIGURE 2.4-7