

CHAPTER 3 EFFECTS NOT FOUND TO BE SIGNIFICANT**3.1 Agricultural Resources**

This section discusses potential impacts to agricultural resources resulting from the implementation of the proposed project. This analysis is primarily based on the Agricultural Analysis prepared by James Chagala & Associates (February 2013) for the Warner Ranch, in accordance with the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Agricultural Resources*. That study is included in this Environmental Impact Report (EIR) as Appendix N. This section is also based on information provided in the Preliminary Drainage Study (Appendix P) and Phase I Environmental Site Assessments (ESAs) prepared for the proposed project (Appendix J).

3.1.1 Existing Conditions**3.1.1.1 Environmental Setting****Agricultural Resources**

Warner Ranch has been used for horse keeping and animal raising since at least 1928. Orange and avocado orchards have been added over the years. The property has never been under a Williamson Act contract or within an Agricultural Preserve. Presently, there are approximately 51.0 acres of productive agriculture on the site, in orchards on the southwestern and central western portions of the property (Figure 3.1-1, Agricultural Resources). This represents approximately 10 percent of the site. An area of approximately 80.0 acres is presently within the Rainbow Municipal Water District and is within the County Water Authority, but no water lines or meters currently serve the property. The property is presently served by five wells along State Route 76 (SR 76).

The regional setting includes the valley and slope areas of the San Luis Rey River Valley, and covers approximately 11,745.0 acres. It is generally level within the valley created by the San Luis Rey River and some tributaries, with the exception of some of the fringe areas to the north and south. This regional area is within the Pala–Pauma Community Planning Area and a considerable amount of the area is in American Indian reservations. Outside of the reservations, the County General Plan shows regional categories of Rural and Semi-Rural over a large majority of the area. There is a combination of various General Plan designations in the Rural and Semi-Rural areas including RL-40, RL-20, and SR-10. Additionally, there is the Village regional category in the central Pauma area which has VR-2.9 and VR-4.3 General Plan designations. Approximately 40 percent of the overall area is used for agriculture, roughly 4,635.6 acres. There are also large portions scattered throughout the overall area that are vacant. Agriculture in this area is primarily citrus, with small areas of intensive truck farming,

nursery stock, avocados, and grazing. The balance of the area consists of estate homes, the San Luis Rey Country Club Golf Course, or vacant land.

Climate in this region is similar to inland San Diego County with slightly more rainfall and more extremes in climate than the coastal area. The climate is mild, which is an important factor for the agriculture that exists in this area. About 4,435.5 acres (38 percent) of the soils are classified as principal farmlands. Generally the quality of soils varies from fair to good, with the better soils found in the eastern San Luis Rey Valley. Climate is considered to be more important than soils in the agricultural development of this area.

Project Area

The project area has been defined per the boundary of the Zone of Influence, as set forth in the Guidelines for the Local Agricultural Resources Assessment (LARA) Model (discussed below and in Appendix N). The project area includes the project site and all parcels within 1,320 feet of the smallest rectangle that completely encompasses the project site (Figure 3.1-2, Study Area). The project area covers approximately 2,880.0 acres, including the approximately 513.0 acres of the project site. Within the project area as determined by the LARA Model, there are approximately 167.8 acres in agriculture. The components include approximately 34.9 acres in avocado groves, 39.5 acres in nurseries, 54.3 acres in grazing, 36.4 acres in dry farming, and just 2.7 acres in citrus groves.

Agricultural Resources Characteristics

The California Department of Conservation has classified land in California into categories. Four of these are relevant to the agricultural resources analyses for this project (Appendix N):

- **Prime Farmland.** Land with the best combination of physical and chemical characteristics, able to sustain long-term production of agricultural crops.
- **Farmland of Statewide Importance.** Land with a good combination of physical and chemical characteristics for agricultural production, having only minor shortcomings, such as less ability to store soil moisture, compared to prime farmland.
- **Unique Farmland.** Land used for production of the state's major crops on soils not qualifying for prime or statewide importance. This land is usually irrigated, but may include non-irrigated fruits and vegetables as found in some climatic zones in California.
- **Farmland of Local Importance.** Land that meets all the characteristics of Prime Farmland and Farmland of Statewide Importance, with the exception of irrigation.

Figure 3.1-3, Important Farmlands within the Study Area, shows the areas for various farmland categories found in the project area, including the project site. Prime Farmlands constitute approximately 74.9 acres (15 percent) of the project site. Unique Farmlands cover approximately 45.4 acres (8 percent). Farmlands of Local Importance are found on approximately 173.5 acres (34 percent) of the subject property (Appendix N).

The County of San Diego has approved a local methodology known as the Local Agricultural Resource Assessment (LARA) Model that is used to determine the importance of agricultural resources. The LARA Model takes into account six factors in determining the importance of agricultural resources. Water, climate, and soil quality are Required Factors in the Model, while surrounding land uses, land use consistency, and slope are Complementary Factors. Each Factor receives a rating of high, moderate, or low importance based on site-specific information. The LARA Model is discussed in detail in Appendix N.

3.1.1.2 Regulatory Setting

There are many laws, regulations, policies and programs that aim to protect, preserve, and promote agriculture. The following discussion details the most relevant regulations, policies, and programs that could have a specific effect on the project and how its impacts are analyzed.

State Laws and Regulations

California Land Conservation Act (Williamson Act)

This legislation was designed as an incentive to retain prime agricultural land and open space in agricultural use, slowing conversion to development. The program is a 10-year contract between the City or County and the land owner. Under the contract, the land is taxed on the basis of its agricultural use rather than on its market value. Nonrenewal of a contract under the Williamson Act is a 10-year process, with property taxes raised incrementally each year. Few property owners in San Diego County have requested Williamson Act contracts over the past 25 years. California Farmland Mapping and Monitoring Program (FMMP).

This California Department of Conservation program produces maps and statistical data for use in analyzing impacts to agricultural resources. Agricultural land is rated according to soil quality and irrigation status. Maps are updated every 2 years; the minimum mapping unit is 10 acres. Ratings of Prime Farmlands, Farmlands of Statewide Importance, and Unique Farmlands are referenced in the California Environmental Quality Act (CEQA) Guidelines, as resources to be considered in impact evaluation.

Other agricultural legislation and policies are included in the Agricultural Analysis completed for this project (Appendix N). The Local Agency Formation Commission (LAFCO) Agricultural Policy L-101 is discussed in Section 3.1.2.4, Conflicts with LAFCO Agricultural Policy L-101.

Local Laws and Regulations

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

This policy establishes procedures for implementing Williamson Act contracts in the County and for establishing agricultural preserves. This Board policy also outlines the criteria for the establishment, modification, and disestablishment of an agricultural preserve. This legislation and these policies include Williamson Act contracts. There is a property under such contract near the proposed project.

County of San Diego General Plan

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

Land Use Element

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

- **LU-5.3, Rural Land Preservation.** Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi Rural Land Use Designations. Open space and rural lands are primary areas that provide carbon sequestration benefits for the Region.
- **LU-6.4, Sustainable Subdivision Design.** Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations

including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities consistent with the applicable community plan. [See applicable community plan for possible relevant policies.]

- **LU-7, Agricultural Conservation.** A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.
- **LU-7.1, Agricultural Land Development.** Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

Conservation and Open Space Element

The County of San Diego is the only major urban county with a farm gate value consistently ranked among the top ten agricultural counties (ranked eighth for several years) in California. The County has the fourth-highest number of farms of any county in the country and third-highest number of farms of any county in California. Agriculture is the fifth-largest component of the County's economy. Agriculture in the County provides an array of economic, environmental, and social benefits that contribute to the quality of life in the region. Agriculture also provides a valuable open space resource and plays a critical role in regional wildlife conservation by providing usable open space corridors and habitat for some species. Applicable General Plan policies include:

- **COS-6.2, Protection of Agricultural Operations.** Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:
 - Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations
 - Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses
 - Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development.
 - Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture
 - Supporting local and State right-to-farm regulations
 - Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process.
 - Discourage development that is potentially incompatible with intensive agricultural

uses, including schools and civic buildings where the public gather, daycare facilities under private institutional use, private institutional uses (e.g., private hospitals or rest homes), residential densities higher than two dwelling units per acre, and offices and retail commercial.

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

3.1.2 Analysis of Project Effects and Determination as to Significance

The County of San Diego has developed *Guidelines for Determining Significance and Report Format and Content Guidelines: Agricultural Resources* (County of San Diego 2007). An affirmative response to, or confirmation of, any one of the following guidelines will be generally be considered a significant impact to agricultural resources as a result of project implementation, in the absence of scientific evidence to the contrary. There are four categories of potential impacts included in the guidelines that could pertain to this project: (1) direct impacts to on-site agricultural resources, (2) indirect impacts to agricultural resources, (3) conflicts with agricultural zoning and Williamson Act contracts, and (4) conflicts with LAFCO Agricultural Policy L-101 and cumulative impacts to surrounding agricultural resources, as a result of project implementation. Each of these is discussed in the following subsections, with the significance guidelines included in each subsection.

Guidelines for the Determination of Significance

Direct impacts to agricultural resources are potentially significant when a project would result in the following:

1. 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.
2. Indirect impacts to off-site agricultural resources and/or Williamson Act contract land are potentially significant when a project would result in the following:
 - a. The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act Contract (Contract) and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

- b. The project proposes a school, church, day care or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Contract and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
 - c. The project would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of off-site agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act Contract.
3. The project would conflict with a Williamson Act Contract or the provision of the California Land Conservation Act of 1965.
 4. The project would conflict with LAFCO Legislative Policy L-101, which states LAFCO is to:
Discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would promote the planned, orderly, efficient development of an area or the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural land for agricultural use.

Prime agricultural land has been defined as:

An area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- Land that qualifies, if irrigated, for rating as class I or class II in the USDA [United States Department of Agriculture] Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- Land that qualifies for rating 80 through 100 Storie Index Rating.
- Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the Nation Range and Pasture Handbook, Revision 1, December 2003.
- Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than 5 years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than \$400) per acre.
- Land that has returned from the production of unprocessed agricultural plant

products an annual gross value on not less than \$400 per acre for 3 of the previous 5 calendar years.

3.1.2.1 *On-Site Agricultural Resources*

Analysis (Guideline 1)

The FMMP designates the on-site agricultural areas as either Prime Farmlands or Unique Farmlands, with 20.5 percent of the property being a candidate for listing as Prime Farmland or Farmland of Statewide Importance Soils. Soils are evaluated through the LARA Model.

As stated previously, the LARA Model identifies three Required Factors of water, climate, and soil quality:

- **Water.** The nearest water line is approximately 1,600 feet north of the project, and there is no meter on the property. Approximately 30 percent of the project site is underlain by an alluvial aquifer that would initially allow a moderate rating if the water quality is acceptable. However, the Phase I ESA prepared for the Warner Ranch Project (Appendix J) noted that, based on the testing of four on-site wells in March 2011, groundwater occurring on the project site is documented to have total dissolved solids (TDS) levels of 610 to 1500 milligrams per liter (mg/L). Under the guidelines of the LARA Model, a TDS level above 600 mg/L would result in a one-step reduction of the calculated water factor rating. As such, the rating for the water factor would be reduced from the “moderate” rating to “low” (see Appendix N and Appendix P).
- **Climate.** The site is within Sunset Climate Zone 21, and the climate factor would be rated “high,” pursuant to the County guidelines.
- **Soil Quality.** Analysis of soil quality would initially indicate the soil quality factor as “low” (Appendix N), but the presence of more than 10.0 acres of contiguous Prime Farmland and Farmland of Statewide Importance increase the soil quality rating to “moderate.”

In addition to the three Required Factors, the LARA Model includes three Complementary Factors, as follows:

- **Surrounding Land Use.** Approximately 90 percent of the area within the Zone of Influence would be considered compatible with agriculture. The rating for surrounding land use would be “high” (Appendix N).
- **Land Use Consistency.** The median parcel size of the project is less than the median parcel size within the Zone of Influence. As such, the land use consistency rating for would be “high” (Appendix N).

- **Slope.** The average slope for the site for lands available for agriculture is approximately 56 percent. Therefore, the slope rating would be “low” (Appendix N).

The combination of these factors’ ratings is evaluated pursuant to the matrix (Appendix N) presented in Table 3.1-1, Interpretation of LARA Model Results. The LARA Model analysis determined that this site is not an important agricultural resource because it falls within Scenario 5 in Table 3.1-1, with the Required Factor of water resources receiving a “low” rating. Scenario 5 states that when at least one factor is rated low importance, then the site is not an important agricultural resource. Therefore, there are no direct impacts to on-site important agricultural resources, and impacts would be **less than significant**.

3.1.2.2 *Indirect Impacts to Agricultural Resources*

Analysis (Guideline 2)

The proposed project would incorporate a non-agricultural use near an active agricultural operation that is no longer under a Williamson Act Contract. Therefore, the project would not result in land use conflicts or the conversion of agricultural resources to a non-agricultural use for the following reasons:

- The areas that were previously under the Williamson Act Contract have been non-renewed, and therefore, the Contract was terminated, on January 1, 2013. Additionally, the use on the former Williamson Act Contract property is grazing. The grazing present on this property would not present substantial noise and odor impacts typical of agricultural operations such as odor from dairy farms or noise generating machinery from crop fields. Therefore, the off-site agricultural use is not likely to conflict with a residential area.
- There is separation between the residential uses proposed and the existing agricultural uses. The smallest distance between a proposed home site and an existing agricultural operation would be the grazing area to the south, which would be 180 feet from the nearest home site and across SR 76. All other agricultural operations would be separated by at least 1,800 feet from the nearest proposed residence.
- The dry farming parcel within the Pala Village is, at the nearest point, located 1,800 feet from the nearest proposed residential unit of the project. In addition, this parcel, as well as each of the other parcels identified as dry farming, is adjacent to existing single-family dwellings within the Pala Village. Finally, there is a recent residential development on the reservation approximately 300 feet to the west of the nearest dry farm area and between the dry farm area and the proposed project. Thus, these dry farm parcels have not been affected in their use by adjacent residences, and there is a recent plan for additional residences between the proposed project and most of the dry farming. If the dry farming areas have not been impacted by the contiguous and nearby residences, it is unlikely they will be

impacted by residences 1,800 feet distant (see Figures 3.1-2 and 3.1-4 (Agricultural Uses in the Study Area)).

- On February 12, 2003, the San Diego County Board of Supervisors amended the San Diego County Code of Regulatory Ordinances to add the County Agricultural Enterprises and Consumer Information Ordinance, which requires home purchasers to be notified in writing that agricultural uses may exist near to property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences. Thus anyone purchasing a parcel of this development must be notified of the near agricultural uses and the potential for irritations and inconveniences.

The proposed project does not include a school, church, day care or other use that involves a concentration of people at certain times. As previously discussed, agricultural operations in the vicinity of the project site and would be separated from the proposed project. As a result, the proposed project would not result in land use conflicts or the conversion of agricultural resources to a non-agricultural use.

The proposed project does not include other changes to the existing environment that could result in the conversion of off-site agriculture resources. The project site currently includes vacant land or agriculture that would be changed to single-family residences under the proposed project. As previously discussed, the Williamson Act Contract located within the vicinity of the project site was non-renewed and therefore, terminated, on January 1, 2013. Additionally, agricultural operations would be separated from the proposed project and would not result in the conversion of off-site agricultural resources to a non-agricultural use.

Based on the analysis above, the project indirect impacts to on-site agricultural resources would be **less than significant**.

3.1.2.3 Conflicts with Agricultural Zoning and Williamson Act Contracts

Analysis (Guideline 3)

The project site is not now, and never has been, under a Williamson Act Contract or within an Agricultural Preserve. Refer to Section 3.1.2.2, Indirect Impacts to Agricultural Resources, for a discussion of indirect impacts to Williamson Act Contract land. Therefore, direct impacts to agricultural resources under Williamson Act contract would be **less than significant**.

3.1.2.4 Conflicts with LAFCO Agricultural Policy L-101

Analysis (Guideline 4)

The Agricultural Analysis (Appendix N) contains a review of LAFCO Agricultural Policy and is included Appendix C of the Agricultural Analysis. The following is taken from that document.

The project site occupies 513.0 acres. There are two soils which are Class I or II, and they occupy 82.0 acres (16 percent) of the property. It would not be logical to view the 513.0-acre project site as prime when only a small amount falls under this definition. In addition, there is no imported water distributed to this site for irrigation, and the well water was documented to contain TDS at levels higher than 600 mg/L (see Appendices P (Drainage Study) and N (Agricultural Studies) and Appendix J (Phase I Environmental Assessment Report)).

Only one soil has a Storie Index Rating of 80–100 and occupies 57.0 acres (11 percent) of the property. Again, it would not be logical to view the entire 513.0 acres as prime when only a small amount falls under this definition.

This land does not support livestock used for the production of food and fiber. It was at one time a horse ranch, but that use was discontinued in 2005. The existing groves have been losing money for many years, without a return of \$400.00/acre, which would preclude the land from being considered as prime agricultural land by LAFCO based on LAFCO definitions as listed LAFCO Legislative Policy L-101 (listed under Guidelines for the Determination of Significance in Section 3.1.2). The Cortese-Knox-Hertzberg Act provides specific definitions for “agricultural lands,” “prime agricultural land,” and “open space” per LAFCO. Prime agricultural land is defined above. Open space is defined as:

Open space means any parcel or area of land or water which is substantially unimproved and devoted to an open space use, as defined in Section 65560 of the Government Code as follows:

- a. “Local open-space plan” is the open-space element of a county or city general plan adopted by the board or council, either as the local open-space plan or as the interim local open-space plan adopted pursuant to Section 65563.
- b. “Open-space land” is any parcel or area of land or water which is essentially unimproved and devoted to an open-space use as defined in this section, and which is designated on a local, regional or state open-space plan as any of the following:
 1. Open space for the preservation of natural resources including but not limited to, areas required for the preservation of plant and animal life,

including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays and estuaries; and coastal beaches; lakeshores, banks of rivers and streams, and watershed lands.

2. Open space used for the managed production of resources, including but not limited to, forest lands, rangeland, agricultural lands and areas of economic importance for the production of food or fiber; areas required for recharge of ground water basins; bays, estuaries, marshes, rivers and streams which are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.
3. Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.
4. Open space for public health and safety, including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs and areas required for the protection and enhancement of air quality (California Government Code, Section 56059).

Developed areas, agricultural uses, and disturbed areas occupy approximately 151.5 acres of the 513.5-acre site. The remainder of the site is currently open space. While a majority of the site would be preserved as open space (approximately 359.0 acres), some open space areas would be converted as a result of the project. However, the project site is currently designated by the General Plan as RL-40 and zoned as A-70, Limited Agriculture and A72, General Agriculture Uses. The project site does not meet the definitions of open space as described above because it is not designated as open space by the General Plan or in any local, regional or state open-space plan.

Therefore, based on these analyses, the proposed project would have **less than significant** impacts to the intent of LAFCO Agricultural Policy L-101.

3.1.3 Cumulative Impacts

As indicated in Appendix N, the geographic extent for the cumulative study area also functions as the regional context. The boundaries of this area were established by reviewing features of the landscape, which may isolate agriculture in this vicinity from other agricultural areas in the County. These landscape features were primarily major areas of steep slope that would separate agricultural areas, major areas where no agricultural activity was taking place, and areas that had had substantial urban development.

The regional context area is within the Pala-Pauma Community Planning Area. A considerable amount of the area is in Indian Reservations. Outside of the reservations, the County General Plan shows regional categories of Rural and Semi-Rural over a large majority of the area. There is a combination of various General Plan Designations including the RL-40, RL-20, SR-10 in the Rural and Semi-Rural areas. Finally, there are the VR-2.9 and VR-4.3 designations within the current Pauma Village Area.

About 39.5 percent of the cumulative study area is used for agriculture, or roughly 4,635.6 acres. There are also large areas scattered throughout the cumulative study area that are vacant. Agriculture in this area is primarily citrus, with small areas of intensive truck farming, nursery stock, avocados and livestock grazing.

About 4,435.5 acres, or 37.8 percent of the soils in the cumulative study area are classified as principal farmlands (see Appendix N). Generally the quality of soils in this area vary from fair to good, with the better soils found in the Eastern San Luis Rey Valley. Regionally, conversion and/or expansion of agricultural lands has been ongoing throughout most areas of the cumulative study area for decades. Within the cumulative study area, as determined by the LARA Model, there are 167.8 acres in agriculture of which 35.0 acres are in avocados, 40.0 acres in nurseries, 90.0 acres used for grazing, and 2.7 acres in citrus (Appendix N). Cumulative projects, as listed in Table 1-4 of this EIR, could introduce uses that may not be compatible with agricultural uses, and therefore, could result in the conversion of agricultural land to a nonagricultural use or could adversely impact the viability of agriculture on land under a Williamson Act Contract. The Sotelo Administrative Permit and Panes Administrative Permit projects would result in the clearing of approximately 9.0 acres of limited agricultural land combined. The Lilac Hills Ranch project also has potential to incrementally impact agricultural resources and result in land use adjacency conflicts. Therefore, a potentially significant impact to agricultural resources could occur.

However, Section 4.2.4 of the County Guidelines indicates in part that:

A project that is determined not to be an important agricultural resource under the LARA Model that would not have significant indirect impacts to agricultural

resources, and that would not conflict with agricultural zoning or a Williamson Act Contract would not have the potential to contribute to a cumulative impact.

The LARA Model indicates that the project site is not an important agricultural resource. Therefore, the proposed project would not result in potential conflicts with agricultural zoning and Williamson Act Contracts would not contribute to a cumulatively significant impact to agricultural resources.

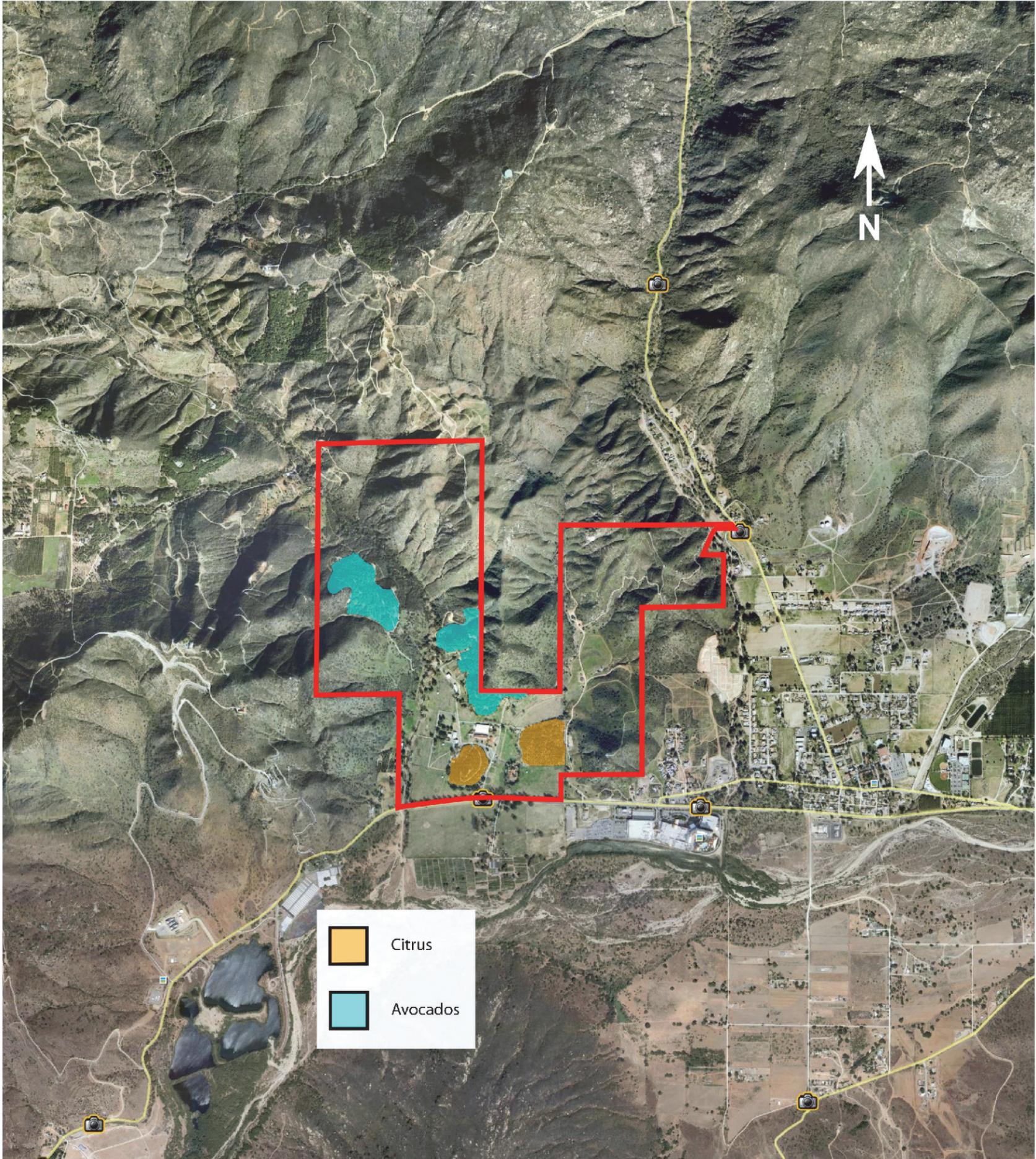
3.1.4 Conclusion

There are no impacts to important on-site agricultural resources, and impacts to off-site agricultural resources would be less than significant.

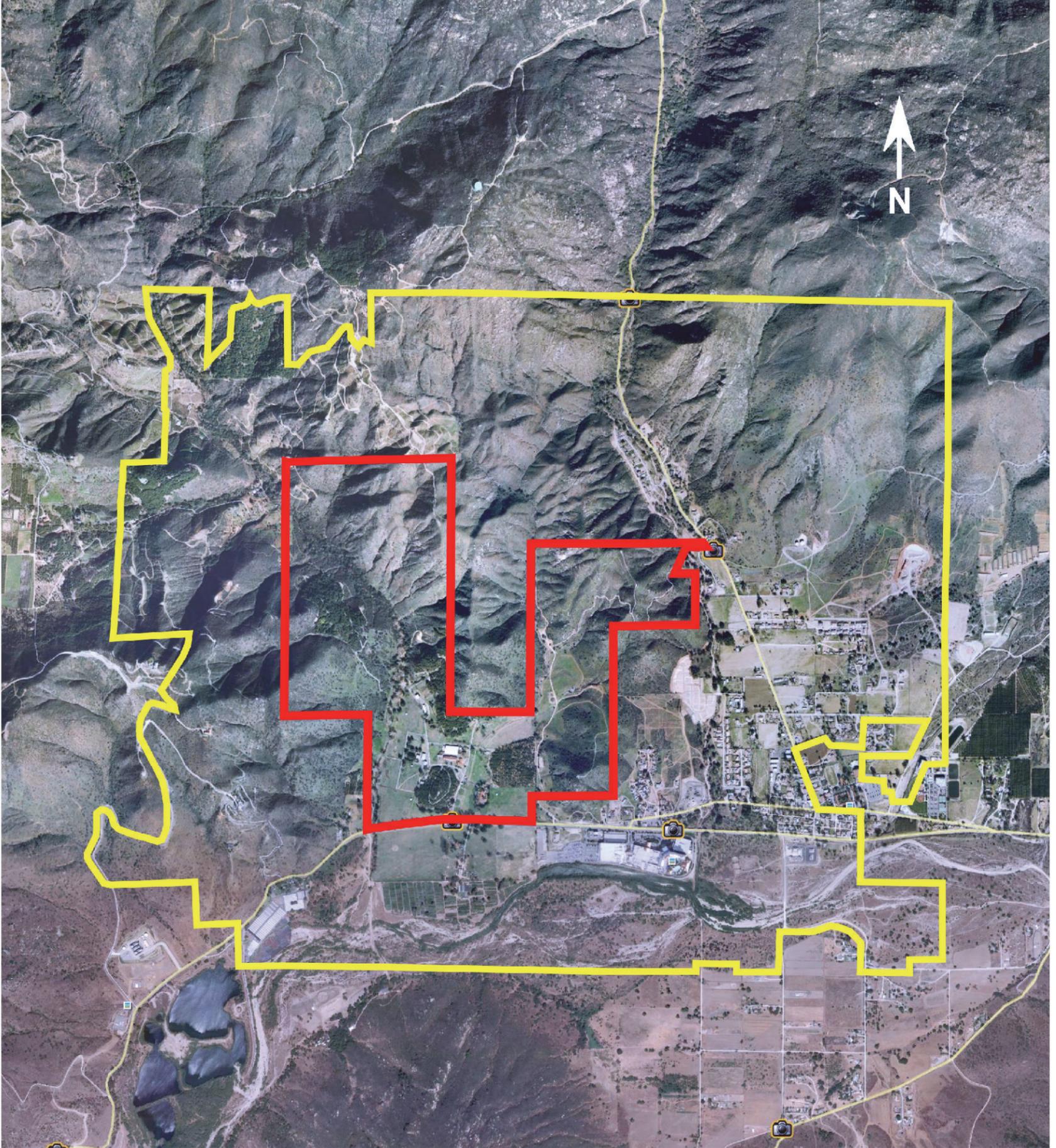
**Table 3.1-1
Interpretation of LARA Model Results**

| LARA Model Results | | | LARA Model Interpretation |
|--------------------|--|---|---|
| Possible Scenarios | Required Factors | Complementary Factors | |
| 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 and one factor rated moderate | At least two factors rated high or moderate | |
| Scenario 3 | One factor rated high and 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 | | |

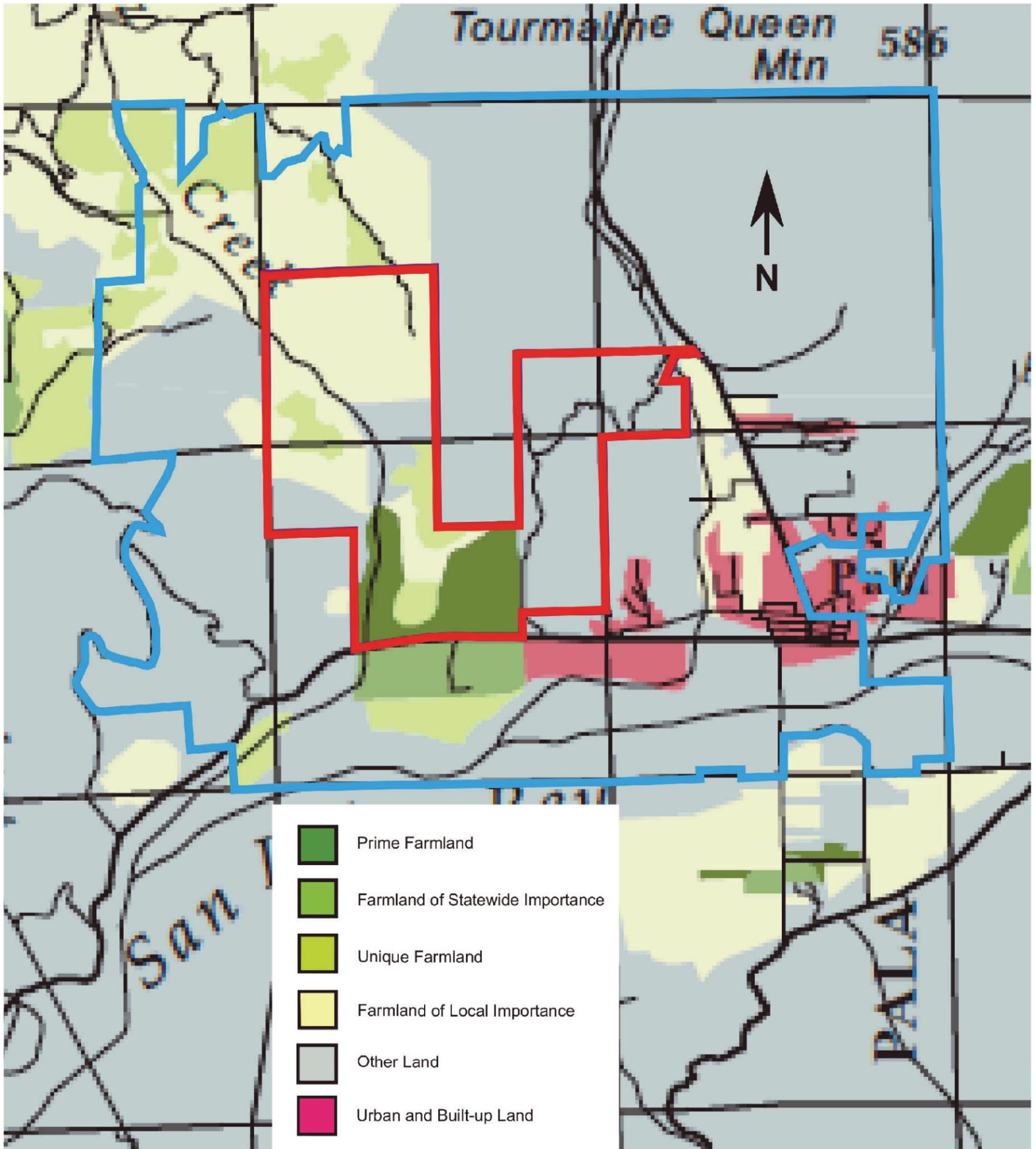
Source: County of San Diego 2007.



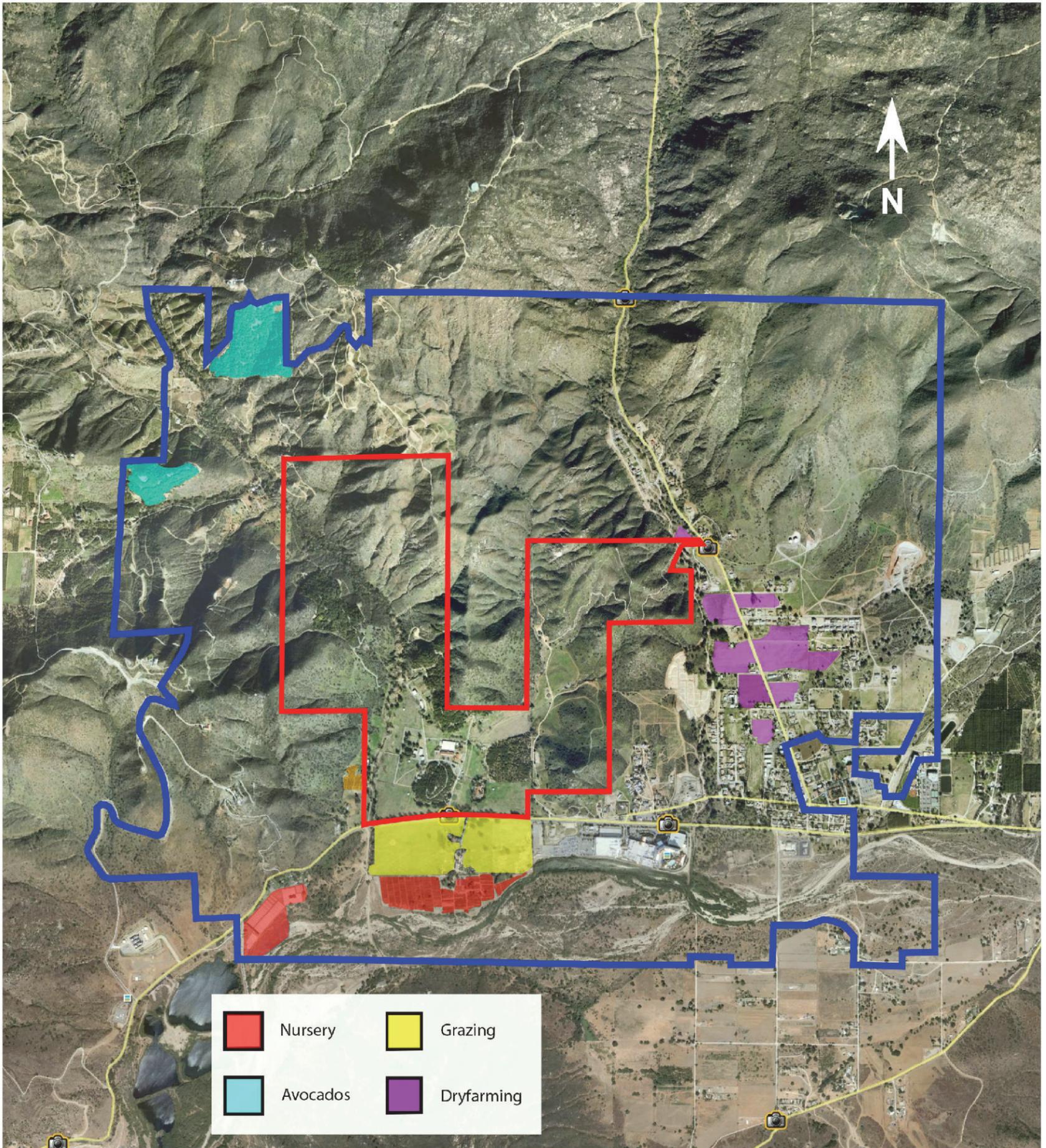
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