

Agricultural Conversion Analysis

for

McNally Road TPM 21004

**APN 128-271-10, 11, 17, 18, 31, 32, &128-460-03
ER 06-02-007**

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EXECUTIVE SUMMARY

The project, consisting of Assessor's Parcel Number's (APNs) 128-271-10, 11, 17, 18, 31, 32, and 128-460-03, is located in the community of Pauma Valley, an unincorporated area in northern San Diego County. The project proposes a **subdivision** of 87.25 acres consisting of five parcels with a minimum of four acres each. The **property** is located **within** the Valley Center Community Plan Area and is zoned A70, which allows a **density** of one dwelling unit per four acres.

The project site is currently used for groves of avocados and some lemon trees.

The project will have a significant impact on agricultural resources if it: (1) causes conversion of significant agricultural lands, as defined by the California Agricultural Land Evaluation and Site Assessment (LESA) Model; (2) conflicts with existing zoning for agricultural use or a Williamson Act contract; (3) involves other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use; (4) contributes to a significant decline in lemon production in San Diego County; or (5) converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency (FMMP), to non-agricultural use.

The subdivision of the project does not exceed thresholds established for the project and therefore does not present significant impacts to agriculture. The LESA analysis determined the site does not constitute a significant agricultural resource. The proposed use is consistent with existing zoning. The proposed project would involve the conversion of existing farmland to nonagricultural uses. However, it is the intent of the project to continue agricultural operations on the site with disturbance of the existing groves limited to what is necessary for creating the allowed residences. The report therefore concludes that impacts are not significant and no mitigation is required.

1. AGRICULTURAL ANALYSIS

1.1 INTRODUCTION

This analysis discusses the potential for regional and local impacts caused by the loss of farmland and examines agricultural conversion in terms of resources onsite and affected surrounding lands. Resources include land, soils, infrastructure, water, surrounding land uses, and community character factors.

Tentative Parcel Map (TPM) 21004 is located in Pauma Valley and proposes the subdivision of approximately 87.25 acres into four parcels measuring approximately four acres each plus one remainder parcel measuring approximately 66 acres.

1.2 REGULATORY FRAMEWORK

1.2.1 **California Department of Conservation, Division of Land Resource Protection's Farmland Mapping and Monitoring Program**

The California Department of Conservation, Division of Land Resource Protection's Farmland Mapping and Monitoring Program (FMMP) was established in 1982 in response to the critical need for assessing the location, quality, and quantity of agricultural lands and conversion of these lands over time within the state of California. The FMMP is a nonregulatory program that provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The program's first maps were created in 1984 and covered 30.3 million acres within 38 counties. Since 1988, eight Farmland Conversion Reports have been completed detailing the farmland changes and include expanded areas as soil surveys became available. The land use inventory is conducted every two years to identify agricultural and urban land use conversions. The 2002 FMMP maps include both agricultural and urban land uses on over 90 percent of the state's privately held land, and now cover 44.5 million acres within 48 counties.

To be considered on the FMMP's Important Farmland Maps as Prime Farmland or Farmland of Statewide Importance, soils must meet both of the following criteria:

1. Production of irrigated crops at some time during the four years prior to the creation of the Important Farmland Map. FMMP staff determines whether an area has been irrigated during examination of current aerial photos, local comment letters, and field verification.
2. The soil must meet the physical and chemical criteria for Prime Farmland or Farmland of Statewide Importance as determined by the United States Department of

Agriculture (USDA) Natural Resources Conservation Service (NRCS). NRCS compiles lists of the soils in each survey area that meet the quality criteria. Factors considered in qualification of a soil by NRCS include:

- Water moisture regimes, available water capacity, and developed irrigation water supply
- Soil temperature range
- Acid-alkali balance
- Water table
- Soil sodium content
- Flooding (uncontrolled runoff from natural precipitation)
- Erodibility
- Permeability rate
- Rock fragment content
- Soil rooting depth

The term “Prime” as it refers to rating for agricultural uses has two meanings in California. FMMP determines the location and extent of “Prime Farmland” as described above, while under the state’s Williamson Act, land may be enrolled under the “Prime Land” designation if it meets certain economic or production criteria.

1.2.2 San Diego County General Plan

The project site is designated as (18) Multiple Rural Use and is categorized as Estate Development Area (EDA). The (18) designation is characterized by one or more of the following: 1) not highly suited for intensive agriculture, 2) rugged terrain, 3) watershed, 4) desert lands, 5) lands susceptible to fires and erosion, 6) lands which rely on groundwater for water supply, and 7) other environmentally constrained areas. The Multiple Rural Use Designation is typically, but not necessarily exclusively, applied in remote areas to broad expanses of rural land with overall low population density and with an absence of most public services. The EDA Regional Category of the General Plan combines agricultural and low density residential uses.

The Valley Center Community Plan of the County of San Diego General Plan would apply to the proposed project. This Community Plan seeks to “preserve and maintain the overall rural and agricultural character of the Estate Residential Development Area.”

1.2.3 San Diego County Ordinance

The site is zoned A70 Limited Agricultural Use Regulations, which are intended to create and preserve areas intended primarily for agricultural crop production and allows for

Family Residential use. Additionally, a limited number of small farm animals may be kept and agricultural products raised on the premises may be processed.

1.2.4 County Board of Supervisors Policy I-38

The County Board of Supervisor Policy I-38 sets forth policies for the implementation of the Williamson Act, which are summarized in Section 1.3.1.4. This Policy establishes the criteria for establishment of preserves within the County of San Diego, including required hearings, minimum lot size, zoning, and eligible ownership. The project site is not under an existing Williamson Act contract. Therefore, Policy I-38 is not applicable to the proposed project.

1.2.5 San Diego County Agricultural Enterprises and Consumer Information Ordinance (§63.401 et seq.)

The Agricultural Enterprises and Consumer Information Ordinance of the San Diego County Code of Regulatory Ordinances (§63.401 et seq.) is intended to define and limit the circumstances under which agricultural enterprise activities, operations, and facilities shall constitute a nuisance. The Ordinance acknowledges that lands used for agricultural purposes may be converted to other uses or zones, whether those parcels are zoned for agricultural uses or not. However, the Ordinance prohibits changes in land uses in the vicinity of an existing agricultural land use that would result in the existing agricultural land use (established for a minimum of three years) to be deemed a nuisance if it was not a nuisance prior to the proposed changes in land use.

1.3 ENVIRONMENTAL SETTING

1.3.1 Existing Conditions

The site is located in northern San Diego County in the unincorporated area of Pauma Valley, as shown in Figure 1-1, "Regional Vicinity Map," on page 1-19. The 87.25-acre site lies south of Highway 76 and east of Cole Grade Road, as detailed in Figure 1-2, "USGS 7.5' Pala Quadrangle Map," page 1-21. The proposed project area has an avocado grove and some lemon trees, as shown in Figure 1-3, "Aerial Photograph," page 1-23.

1.3.1.1 Climate

Pauma has a Pacific Ocean-dominated climate with an average annual precipitation of 13.50 inches and average temperature of 64 degrees Fahrenheit. Pauma is located in the inland valleys, an area known for its favorable climate for growing citrus and its grazing lands for cattle.

1.3.1.2 Cropping History and Suitability

The site currently supports an avocado grove and some lemon trees. Agriculture surrounds the proposed project and consists of avocado groves and citrus. These uses are shown on Figure 1-3, "Aerial Photograph," page 1-23.

"The Soil Survey of the San Diego Area, California," conducted by the United States Department of Agriculture Soil Conservation Service and Forest Service, indicates that the site is largely suitable for avocados, wildlife habitat, recreational area, and watershed. Approximately ten acres of Fallbrook sandy loam (FaC2) is suitable for growing avocados, flowers, tomatoes, citrus, truck crops, dryfarmed grain, and rangeland.

1.3.1.3 Land Use

Figure 1-4, "Land Use Map," page 1-25 shows the project in relation to existing land uses. Residential land uses are shown in red and can be found southeast of the site. Land use surrounding the site is mostly agricultural, shown in green, and consists largely of avocado and citrus groves.

The proposed project and surrounding area have a General Plan designation of (18) Multiple Rural Use, which is intended for single-family homes on existing lots and (17) Estate Residential, intended for minor agricultural and low density residential use. It is not intended that any development occur unless the proposed development has been carefully examined to assure that there will be no significant adverse environmental impacts, that erosion and fire problems will be minimal, and that no urban levels of service will be required. There are General Plan designations of (20) Agricultural Preserves in the area. The site's regional category, Estate Development Area (EDA), combines agricultural and low density residential uses. The site is zoned A70, which intends to create and preserve areas intended primarily for agricultural use. Current land use on the project site consists of avocado groves and lemon trees. Table 1-1, "Active Agricultural Types," page 1-33, summarizes the total acreage of each active agricultural type on the site.

1.3.1.4 Williamson Act Contract Lands

The site is not under Williamson Act contract.

The Williamson Act, originally enacted in 1965 as the California Land Conservation Act, is designed for the specific purpose of long term and predictable protection of agricultural lands, wildlife habitat, scenic corridors, recreational uses, and open space lands. Within recognized habitat areas, landowners can enter into contractual

agreements with local city or county governments to preserve the agricultural potential of land in exchange for reduced tax assessment. The land is evaluated based on its use as agricultural or open space lands instead of at the higher fair market value of the parcel. A dwelling unit or other structure is allowed as long as this structure is secondary to agricultural use.

The contract has a term of ten years, and is renewed each year for an additional year, unless the landowner notifies the local government of a desire not to renew. In that case, the land use restrictions remain in effect until the remaining nine years of the contract have passed. In this way local jurisdictions can control development in agricultural and open space lands, while providing an incentive to landowners to refrain from developing the land. Additionally, there are provisions for cancelling the contract if cancellation is consistent with the purposes of the Williamson Act or otherwise found to be in the public interest.¹

1.3.1.5 Soils

Soil types present on the site and in the vicinity are graphically represented on Figure 1-5, "Soils Map," page 1-27. These include Cieneba-Fallbrook rocky sandy loams and Fallbrook sandy loam. Table 1-2, "Soils Description," page 1-35, lists each soil type on the site, how many acres of each type, soils description and indication if these are prime farmland soils, and identifies its capability unit and Storie Index.

The capability unit indicates the suitability of soils for most kinds of crops. Groupings are made according to the limitations of the soils when used to grow crops and the risk of damage to soils when they are used in agriculture. Soils are rated from Class I to Class VII, with soils having the fewest limitations receiving the highest rating (Class I). None of the soils onsite are rated Class I. Fallbrook sandy loam is rated a Class III soil, and Cieneba-Fallbrook rocky sandy loams are rated Class VI and VII soils.

The Storie Index provides a numeric rating based on a 100 point scale of the relative degree of suitability or value of a given soil for intensive agriculture. The rating is based on soil characteristics such as profile, texture of the surface layer, and slope. The soils onsite have Storie Indexes of 7, 18, and 51. The 9.86 acres of Fallbrook sandy loam (5-9 percent slopes), has the highest rating onsite with 51 and is suitable for agricultural production. The remaining areas of the site consist of sandy loams [Cieneba-Fallbrook rocky sandy loams (9 to 30, and 30 to 65 percent slopes, eroded)], which are suitable for growing avocados.

¹http://www.conserv.ca.gov/DLRP/lca/basic_contract_provisions/index.htm

1.3.1.6 Important Farmland Map

Farmland in the state of California is categorized by its potential for agricultural productivity in the following seven categories listed in descending order: Prime Farmland; Farmland of Statewide Importance; Unique Farmland; Farmland of Local Importance; Grazing Land; Urban and Built-Up Land; and Other Land. The best farmland is categorized as Prime Farmland and its soils have a superior combination of physical and chemical characteristics that sustain long term production of agricultural crops. The next level, Farmland of Statewide Importance, is also highly suitable for agricultural production but is less able to store soil moisture than Prime Farmland. Unique Farmland is used for production of the state's major crops on soils not qualifying for Prime Farmland or Farmland of Statewide Importance. This land is usually irrigated, but can include non-irrigated crops such as certain fruits and vegetables that are found in some climatic zones in California. Farmland of Local Importance is land with the same characteristics as Prime and Statewide Importance Land, with the exception of irrigation. Grazing Land is a category in which the existing vegetation is suitable for grazing livestock. Residential land with a density of at least six residential units per ten acres, as well as land used for industrial and commercial purposes (e.g., golf courses, landfills, airports, sewage treatment, and water control structures) is categorized as Urban and Built-Up Land. Other Land is land that does not meet the criteria of any other category, common examples of which include low-density rural developments; wetlands; dense brush and timberlands; gravel pits; and small water bodies.

Important Farmland Map Categories on the site consist of Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. These categories can be seen on Figure 1-6, "Important Farmlands Map," page 1-29.

Most land on the site is categorized as Unique Farmland and the majority of land in the vicinity of the project is categorized as Unique Farmland. There is a small patch of Farmland of Local Importance in the northern portion of the site, and a portion of Farmland of Statewide Importance in the eastern section.

1.3.1.7 Water Resources

The site is supplied with metered water from the Valley Center Municipal Water District. There is a pond on the site which was supplied with well water from an adjacent groundwater well. Access to the well has been abandoned and the pond is now filled with soil. Groundwater is not used on the site.

1.3.1.8 Agricultural Interface

There are agricultural operations and uses within the Zone of Influence (ZOI), depicted in Figure 1-4, "Land Use Map," page 1-25. Avocado groves and lemon trees are currently grown onsite. Records of pesticide use include Agrimex producer Syngenta which is used to control thrips and mites, and Round-up for weed control.

1.3.1.9 Pesticide Use

A Phase I assessment by Ninyo & Moore Geotechnical and Environmental Consultants, "Phase I Environmental Site Assessment," was completed August 16, 2006. This assessment concludes that empty containers and unusable products should be properly disposed off site and recommends soil sampling in areas where agricultural activities will not continue, such as children's play areas and other uncovered areas of the site.

A Phase II Environmental Site Assessment was completed by Ninyo & Moore Geotechnical and Environmental Consultants March 6, 2007. This study concludes that shallow soil near the smudge pot storage and aboveground storage tank has been impacted with total petroleum hydrocarbons (TPH). It is recommended that the TPH impacted soil be evaluated to assess the lateral and vertical extent of TPH and associated volatile organic compounds (if any) so that recommendations for remediation can be made, if appropriate. Soils found to contain detectable concentrations of contaminants above background levels may be considered waste and may be subject to waste discharge requirements on reuse, export, or disposal. The report further recommends anyone performing subsurface work be alerted to the potential for encountering organochlorine pesticides and/or petroleum hydrocarbons and appropriate health and safety, training, and soil management plans should be prepared and followed.

The avocado and lemon groves are managed by Sierra Pacific Farms, an outside company responsible for chemicals used on the site. Last known application of a pesticide known as Agri-mek was applied in early 2006 via helicopter. Round-Up, an herbicide, is sprayed by outside personnel who bring the product to the site. The owner has stated that herbicides and/or pesticides are not stored on the site.

Helicopter spraying of pesticides on the groves will be discontinued prior to proceeding with residential development to reduce the potential of pesticide contamination to the residents. Local, directed spraying is recommended.

1.3.2 Thresholds of Significance

The California Environmental Quality Act (CEQA) outlines specific factors for review to determine potential impacts to agricultural land. The project will have significant impacts to agricultural resources if it:

1. Causes conversion of significant agricultural lands, as defined by the California Agricultural Land Evaluation and Site Assessment (LESA) Model (1997). Land is classified as significant agricultural land if it achieves any of the following LESA scores:
 - A. Total LESA score of 40 to 59 points and Land Evaluation (LE) and Site Assessment (SA) scores greater than or equal to 20 points each.
 - B. Total LESA score of 60 to 79 points and either LE or SA scores less than 20 points.
 - C. Total LESA score of 80 to 100 points.
2. Conflicts with existing zoning for agricultural use or a Williamson Act contract.
3. Involves other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.
4. Has impacts that are individually limited, but cumulatively considerable. Project impacts are cumulatively considerable if they contribute to a significant decline in lemon production in San Diego County.
5. Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency (FMMP), to non-agricultural use.

1.3.3 Methods and Analysis Limitations

The project was evaluated for potential agricultural impacts using the California Agricultural Land Evaluation and Site Assessment (LESA) Model (1997).

LESA was developed by the federal Natural Resources Conservation Service (NRCS) in 1981 and was adopted as a procedural tool at the federal level for identifying and addressing the potential adverse effects of federal programs on farmland. Nationwide, more than two hundred jurisdictions have developed local LESA methodologies. In 1990 the California Department of Conservation commissioned a study to investigate land use

decisions that affect the conversion of agricultural land in California. The study was, in part, a response to concerns that there was inadequate information available concerning the socioeconomic and environmental implications of farmland conversions, and that the adequacy of current farmland conversion impact analyses under CEQA was not fully known. A California LESA model was formulated as the result of Senate Bill 850 (Chapter 812/1993), with the charge to amend Appendix G of the CEQA Guidelines to reflect a more comprehensive approach to farmland evaluation. Use of the LESA model is specifically provided for in the CEQA Guidelines, as follows:

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) [LESA] prepared by the California Department of Conservation as an optional model to use in assessing impacts on agricultural and farmland.²

The LESA Model rates the relative quality of land resources based on six different factors. Two Land Evaluation (LE) factors are based on measures of soil resource quality: 1) the Land Capability Classification (LCC) and 2) Storie Index Score. The Site Assessment (SA) score is based on four factors that, when added together, make up 50 percent of the total LESA: project size is 15 percent, water resource availability is 15 percent, surrounding agricultural land is 15 percent, and surrounding protected resource land is five percent.

For the project, each of these factors is separately rated. The factors are then weighted relative to one another and combined, resulting in a single numeric score for the project, with a maximum attainable score of 100 points. This project score becomes the basis for making a determination of a project's potential significance, as summarized below.

Total LESA Score	Scoring Decision
0 to 39 Points	Not Considered Significant
40 to 59 Points	Considered Significant only if LE and SA sub-scores are each greater than or equal to 20 points
60 to 79 Points	Considered Significant unless either LE and SA sub-scores is less than 20 points
80 to 100 Points	Considered Significant

²2004 California Environmental Quality Act Guidelines, Appendix G, page 246

Methods used to complete the analysis include accurately scaled maps and aerial photographs of the project site and surrounding area, and a soils survey that delineates the soil mapping units for the project. See Figures 1-2 through 1-6 on pages 1-21 through 1-29.

1.3.4 Analysis of Project Effects and Determination as to Significance

1.3.4.1 LESA Analysis

The LE score is determined by the Land Capability Classification (LCC) and the Storie Index. The LCC demonstrates the suitability of soils for most kinds of field crops. The Storie Index expresses numerically the relative degree of suitability, or value, of a soil for general intensive agriculture. For the LESA evaluation, all project soils are listed with their respective acreage. The LCC and Storie Index for each soil type is applied, and a raw score is derived for each, which when totaled equals 50 percent of the total LESA score. The raw Land Evaluation (LE) score for Tentative Parcel Map 21004 received a LCC score of 20.3 and a Storie Index score of 15.9 (see Attachment A for calculations.) The combined weighted LE score of 9.10 out of a potential score of 50 indicates low suitability of onsite soils for a range of agricultural activities.

The SA score, comprised of four measures (project size, water resources, surrounding agricultural land, and surrounding protected resource land), totaled 32.25 out of 50 possible points. Project size, which recognizes the role scale plays in agricultural productivity, received a rating of 3.0 out of 15 based on the size of the site. The water resource rating was derived by dividing the site into areas based on water availability. Irrigation onsite consists of metered district water. In sum, the site received a water resource score of 14.25 out of 15 points possible, indicating water resource availability is very high.

Land uses for one quarter of a mile around the site, known as the Zone of Influence (ZOI), were assessed using aerial photographs and visual checks on the ground. ZOI land uses include agricultural and residential areas. Agricultural production occurs throughout the ZOI area, and a raw LESA score of 15 was generated out of a potential weighted score of 15. The surrounding agricultural land rating is designed to provide a measurement of the level of agricultural land use for lands in close proximity to a subject project. The proposed project would continue its agricultural operations and remain representative of the surrounding land use.

This same process was used to determine surrounding protected resource land; those lands with long term use restrictions that are compatible with or supportive of agricultural uses of land. A score of zero out of a potential weighted score of five was

assessed for this section of the LESA model, indicating that the ZOI does not contain a large amount of surrounding protected resource land in proximity to the proposed project.

Evaluation of the project resulted in a total LESA project score of 41.35, with a Land Evaluation (LE) score of 9.10 and a Site Assessment (SA) score of 32.25. Based on these results and using the LESA model, the project site is not considered a significant agricultural resource because it is significant only if LE and SA subscores are each greater than or equal to 20 points. Therefore, the project will not cause conversion of significant agricultural lands, Threshold 1 is not exceeded, and no mitigation is required.

1.3.4.2 Zoning and Williamson Act Contracts

The project is consistent with current land use designations and zoning for the site. The proposed project has a General Plan designation of (18) Multiple Rural Use and the site's regional category, Estate Development Area (EDA) combines agricultural and low density residential uses. The site is zoned A70 Limited Agricultural Use Regulations, which are intended to create and preserve areas intended primarily for agricultural crop production. This subdivision will not conflict with the existing zoning or land use designations because the proposed project does not propose to change the existing zoning or land use designations of the site.

No Williamson Act Contracts or Agricultural Preserves, as defined by the California Land Conservation Act of 1965, exist on the site, however, there are contract lands within the proposed project vicinity. The proposed project would continue its agricultural operations and remain representative of the surrounding land use. The site is not subject to a Williamson Act contract and Threshold 2 is not exceeded. Impacts are not significant.

1.3.4.3 Conversion of Farmland

The proposed project will subdivide 87.25 acres into four parcels measuring approximately four acres each plus one remainder parcel measuring approximately 66 acres. Some agricultural lands onsite are directly impacted, however, the proposed project has the ability to maintain agriculture onsite. There is no Prime Farmland or Prime Soil on the site. Of the entire site, approximately seven percent is Farmland of Statewide Importance and six percent is Unique Farmland that will be converted to residential use. Agricultural lands in the vicinity will not be affected by the proposed project. Water quality is not impacted because the project will be required to prepare a Stormwater Management Plan that will ensure protection of water quality.

The project preserves the potential and viability of agricultural uses in the area. Agriculture will be maintained onsite with minimal impact as a result of the proposed subdivision. There are many agricultural operations in San Diego County that take place on two to four-acre parcels with a residence. Agricultural operations will continue on the site and impacts to surrounding operations will be minimal.

Agricultural operations surround the proposed project site. The neighboring agricultural use is similar to existing onsite uses, which will continue, and the adjacent uses will be minimally affected by the proposed project because residential uses will be buffered from agricultural operations. Therefore, potential project impacts resulting from conversion of Farmland to non-agricultural use are less than significant and Threshold 3 is not exceeded.

1.3.4.4 Cumulative Effects

Projects within the vicinity of the project site were researched for cumulative impacts and their locations are shown in Figure 1-7, "Cumulative Projects," on page 1-31. Thirty-five projects were located in the area; twenty-five have been approved, three withdrawn, and seven are still open, as detailed in Table 1-3, "Cumulative Projects List," pages 1-37 and 1-39. There are two projects with Prime Soils/Farmland onsite: TM 5446, a subdivision of 19.7 acres into nine lots, and TPM 20352, a subdivision of 24.4 acres into four lots and remainder lot. The agricultural analysis for TM 5446 is pending. The area on TPM 20352 designated as Prime Farmland is located within an Open Space Easement and therefore this project has no significant impacts to prime agricultural farmland. No other project in the vicinity has either Prime Soils or Prime Farmland onsite and no project in the vicinity has been determined to have agricultural impacts.

The proposed project was examined for its contribution to overall avocado production in San Diego County. According to the County of San Diego Department of Agriculture, Weights & Measures 2004 Crop Statistics & Annual Report, avocados increased both in acreage and value over the last year. The report also states that throughout the county, total agricultural acreage remained stable, slightly increasing by 0.53 percent, and that 63 percent of San Diego farms are between one and nine acres. The project will not contribute to a decline in overall avocado production in San Diego County, and may, in fact, add to agricultural production because of the proposed minimum four acre average parcel sizes and existing agricultural use already in place. Therefore, project effects on San Diego County agricultural production are less than significant and Threshold 4 is not exceeded.

1.3.4.5 Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance

According to the FMMP, the project consists mostly of Unique Farmland and some Farmlands of Statewide and Local Importance. Potential project impacts resulting from conversion of these lands to non-agricultural uses are less than significant because conversion will be limited to areas necessary for residences only, and the agricultural uses onsite will continue. Threshold 5 is not exceeded.

1.3.5 Mitigation Measures

The project does not exceed CEQA thresholds for agricultural land uses. No mitigation is required.

1.3.6 Conclusions

The project was evaluated for potential impacts to agricultural lands using the California Agricultural Land Evaluation and Site Assessment (LESA) model and by examining surrounding area land uses, zoning, and other potential environmental changes. CEQA guidelines to evaluate significance were used as determinants of potential impacts.

The LESA model was used to evaluate the impacts of conversion of farmland to non-agricultural uses such as residential or commercial uses. The evaluation returned low Land Evaluation (LE) scores based on low quality soils and low suitability for intensive agricultural production. The Site Assessment (SA) portion of the evaluation is not considered significant. The combined LESA score is not sufficient to trigger a significant impact under the significance thresholds referenced in Section 1.3.2. In addition, thorough analysis reveals that the project will not conflict with zoning or land use designations because the project is consistent with existing zoning. While the project would result in the conversion of farmland to non-agricultural use, the loss of a limited number of acres will not significantly change viability of avocado production in San Diego County because the average proposed parcel size is ideal for continuing this type of agricultural production. Furthermore, agricultural operations will be buffered from residential portions to reduce the potential for exposure to harmful chemicals.

The project will not result in significant project-level or cumulative impacts to agricultural lands. No mitigation is required.

1.4 CERTIFICATION

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1.5 REFERENCES

California Department of Conservation, Division of Land Resource Protection

2004 Farmland Mapping and Monitoring Program, San Diego County Important Farmland 2002 Map.

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2003 Agricultural Analysis Guidelines.

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1989 Board of Supervisors' Policy I-38, Adopted September 11, 1998, last amended August 22, 1989.

1987 San Diego County Code of Regulatory Ordinances. Title 6 Health and Sanitation, Division 3. Crops and Plants, Chapter 4. Agricultural Enterprises and Consumer Information (§63.411 et seq.).

U.S. Department of Agriculture, Soil Conservation Service³ and Forest Service

1973 Soil Survey, San Diego, California

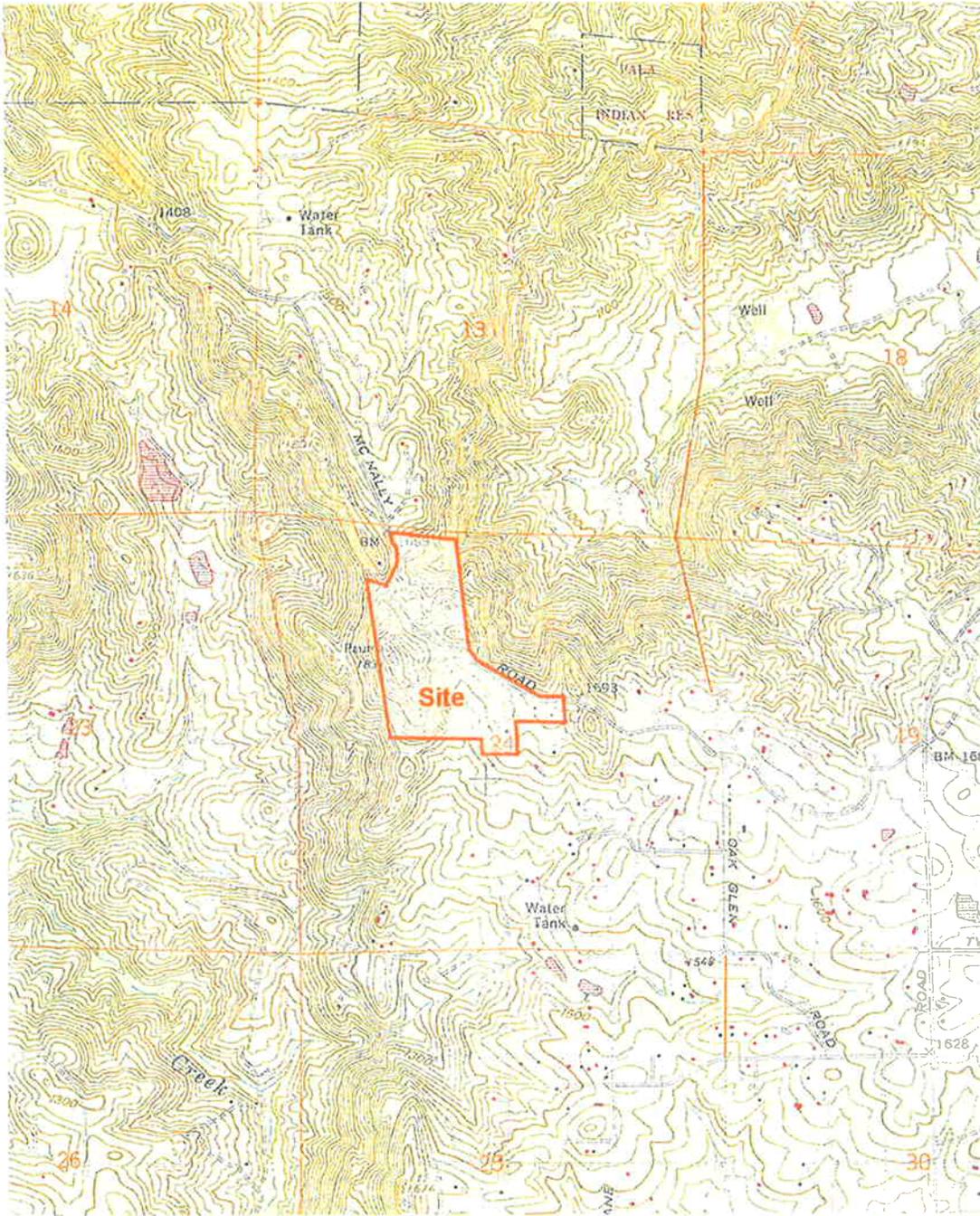
1970 Soil Survey, Sheet No. 34, San Diego Area, California (Rancho Santa Fe Quadrangle)

Figures



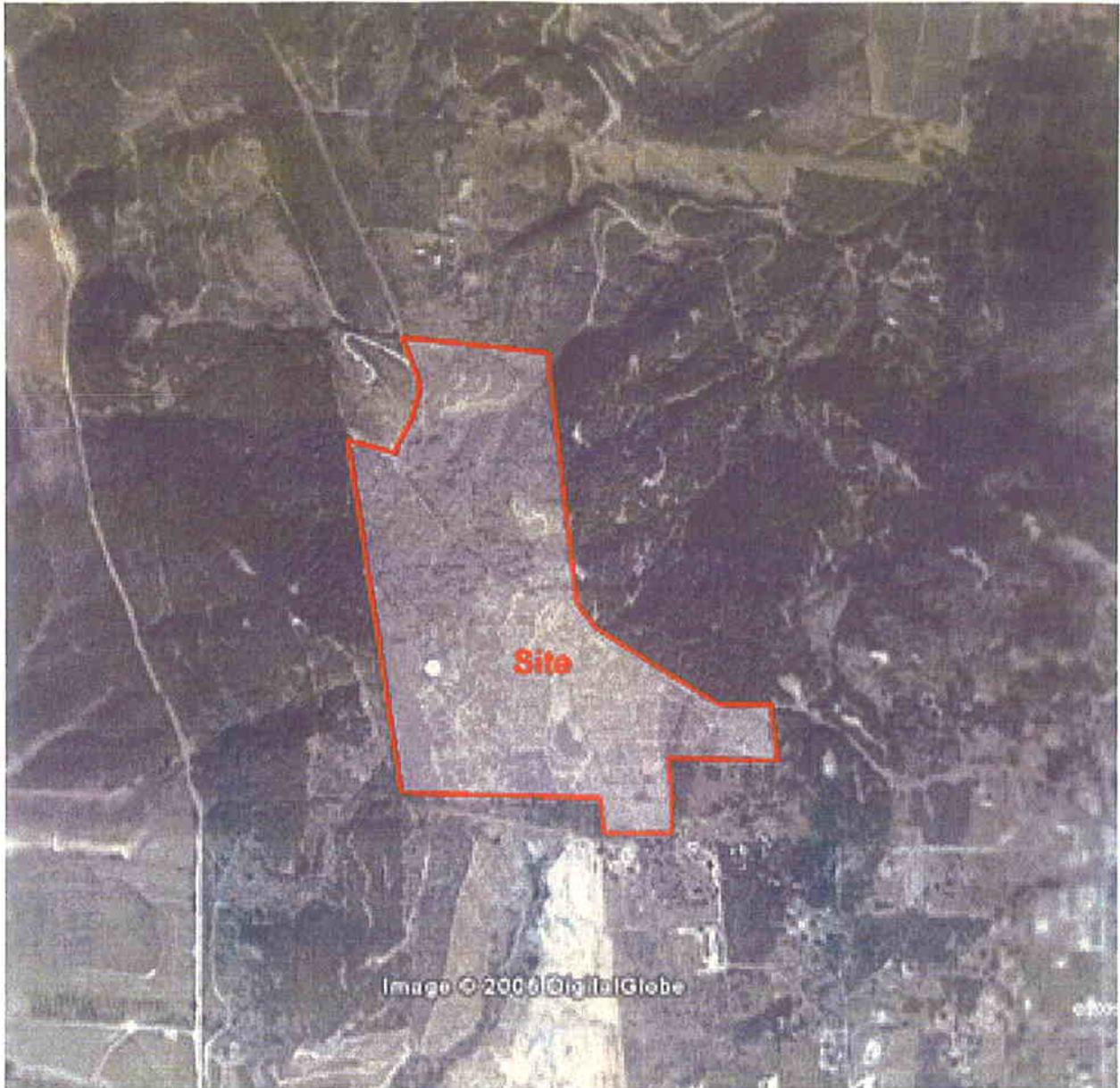
TPM 21004
Regional Vicinity Map

Figure
1-1



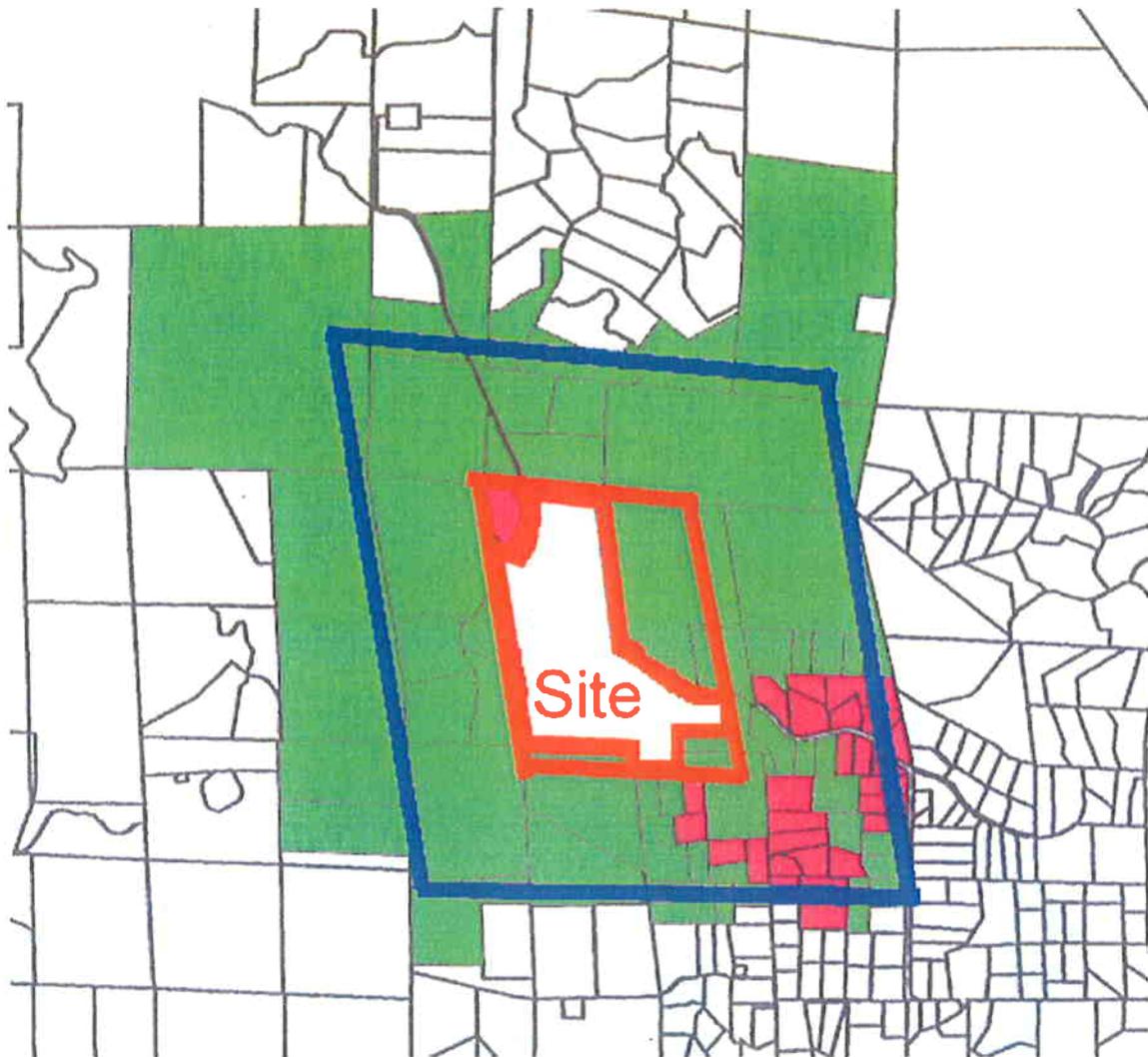
TPM 21004
USGS 7.5' Pala Quadrangle Map

Figure
1-2



TPM 21004
Aerial Photograph

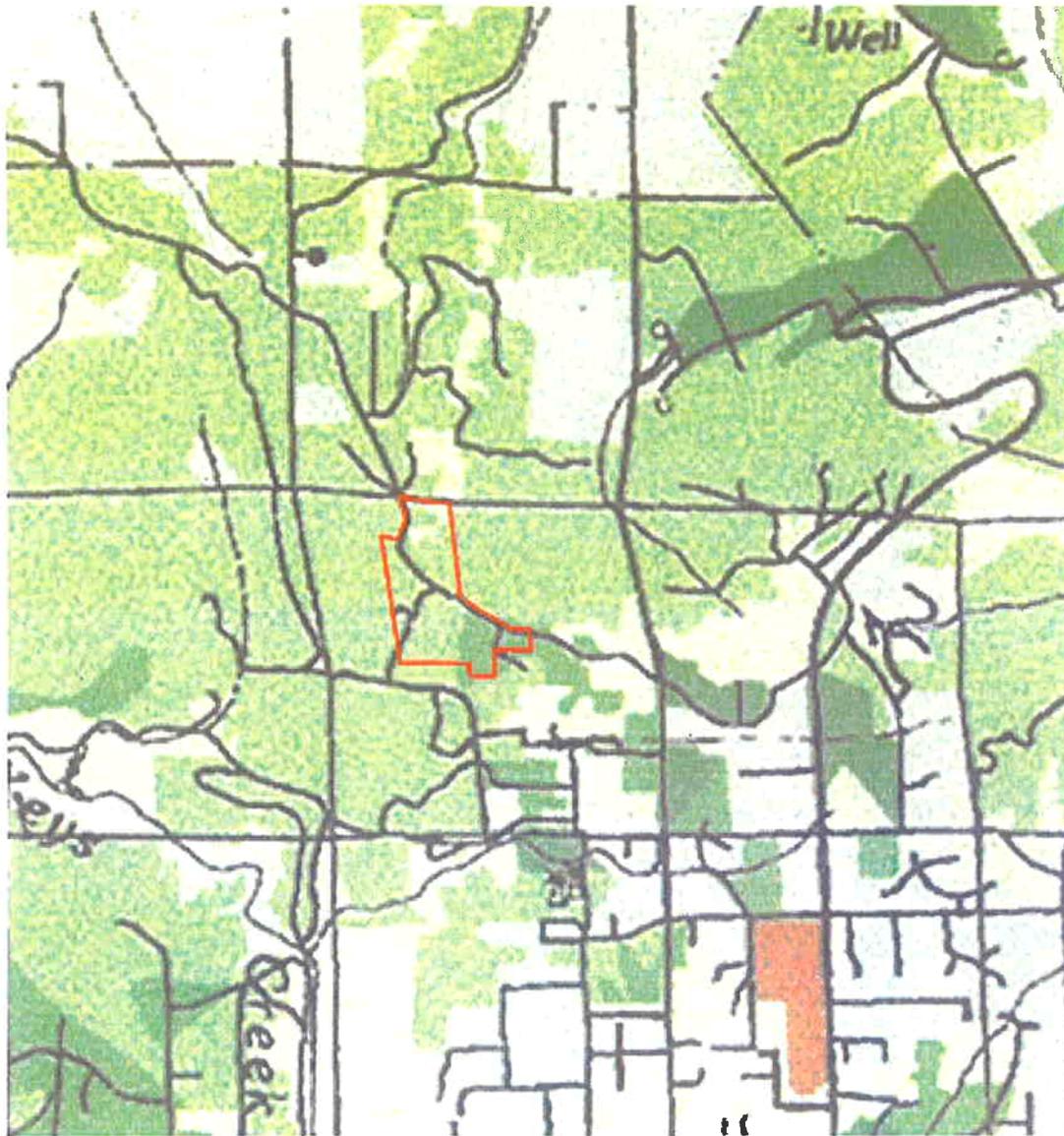
Figure
1-3



-  Site Boundary
-  Zone of Influence Boundary (ZOI)
-  Agricultural
-  Residential

*See Section 1.3.1.3, Land Use, page 1-4





Other Land



Farmland of Statewide Importance



Urban and Built-Up Land



Unique Farmland



Prime Farmland



Farmland of Local Importance



See Section 1.3.1.6, Important Farmland Map Category, page 1-6



TPM 21004
Important Farmlands Map

Figure
1-6

Tables

Active Agricultural Type	Approximate Total On-site Acreage	% of Total On-site Acreage
Avocado	45 acres	52
Lemon	33 acres	37

Soil Type	Acreage	Soils Description	Prime Farmland Soils	Capability Unit (Class)	Storie Index
CnE2	31.76	Cieneba-Fallbrook rocky sandy loams, 9 to 30 percent slopes, eroded	no	VI	18
CnG2	45.63	Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded	no	VII	7
FaC2	9.86	Fallbrook sandy loam, 5 to 9 percent slopes, eroded	no	III	51
Total Acreage 87.25					

* See Section 1.3.1.5 Soils, page 1-5.



TPM 21004
Soils Description

Table
1-2

Project Name	Project Description	Approved, Denied, Withdrawn, or Open	Prime soils/ Prime Farmland	Agricultural Impacts
TM 5446	Oak Glen, subdivide 19.7 ac into 9 lots	open	prime soils	pending
TM 5263	La Questa DePauma, subdivide 274 ac into 51 lots	open	none	none
TM 4944	No.County Ventures, subdivide 25.94 ac into 10 lots, grading of approx. 11.8 ac	approved	none	none
MUP 86-022	St.Stephen's, new sanctuary & parking total 28,195sq'	approved	none	none
ZAP 00-149	Sprint wireless facility at high school under existing bleachers	approved	none	none
MUP 01-016	Dugger Day Care, 7,200sq' bldg & 31 parking spaces	approved	none	none
TM 5251	Cool Valley Rch, subdivide 14.48 ac into 6 lots	open	none	none
TPM 20848	Pauma Hts.Rch, subdivide 16.2 ac into 4 parcels + remainder parcel	open	none	pending
ZAP 05-020	Kevin Brown, 757sq' 2 nd dwelling	approved	none	none
ZAP 04-012	Banuelos, 1,200sq' 2 nd dwelling unit	approved	none	none
ZAP 01-114	Nextel wireless facility, 500sq' bldg	approved	none	none
TPM 20435	Tuomi, subdivide 12.93 ac into 3 lots	approved	none	none
TPM 20982	Avocado Terrace, divide 13.39 ac into 3	withdrawn	n/a	n/a
TPM 5073	Crosby Estate, subdivide 39 ac into 60 lots	approved	none	none
TPM 20480	Choufa, divide 14.92 ac into 4+ remainder	approved	none	none
TPM 20360	George, subdivide 19 ac into 4+remainder	approved	none	none
TPM 20624	Hahlbohm Trust, divide 5.39 ac into 2 lots	withdrawn	n/a	n/a
TPM 20450	Free, divide 9.63 ac into 4 lots	approved	none	none
TPM 20343	Blue Ribbon Farms, divide 8.1 ac into 4	approved	none	none
TPM 20623	Finlayson Residential Subdivision, divide 13.04 ac into 4 lots	approved	none	none
TM 5028	Lindley, divide 29.08 ac into 12 lots	approved	none	none
TM 5150	Tavolada, subdivide 17.41 ac into 8 lots	approved	none	none
TPM 20419	Nicolay Trust, subdivide 8.26 ac into 3 lots	approved	none	none



TPM 21004
Cumulative Projects List

Table
1-3
Page 1 of 2

Project Name	Project Description	Approved, Denied, Withdrawn, or Open	Prime soils/ Prime Farmland	Agricultural Impacts
TM 5506	Pauma Ranches, subdivide 100 ac into 22 lots	open	none	none
MUP 00-094	Ellis 2 nd DU, existing grove not impacted	approved	none	none
TPM 20352	Silverado subdivision, 24.36ac into 4 lots + remainder lot	approved	prime farmland	none
TPM 20929	Caney, 6 ac into 2 lots	approved	none	none
MUP 04-041	Willow Creek, weddings/receptions on 7ac	withdrawn	n/a	n/a
TM 5222	Osterkamp, subdivide 30.13 ac into 10 lots	approved	none	none
TPM 21074	Beebe, subdivide 9.47 ac into 4 lots	open	none	none
TPM 20748	Para Mia Co., subdivide 10.72 ac into 3 lots, 2 DU exist	approved	none	none
TPM 20897	McCowan/Dunckel, subdivide 7.69ac into 2 lots	approved	none	none
STP 01-006	Skyridge Phase II, 7 model homes	approved	none	none
STP 00-024	Michael Crews Dev.II, temporary real estate office	approved	none	none
MUP 07-006	Price Animal Company, specialty animal raising and SFD	open	none	none



TPM 21004
Cumulative Projects List

Attachment A

Land Evaluation Worksheet

Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit	Project Acres	Proportion of Project Acres	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
CnE2	31.76	.37	VI	20	7.4	18	6.7
CnG2	45.63	.52	VII	10	5.2	7	3.6
FaC2	9.86	.11	III	70	7.7	51	5.6
Totals	87.25	(Must Sum to 1.0)		LCC Total Score	20.3	Storie Index Total Score	15.9

Site Assessment Worksheet 1

Project Size Score

I	J	K
LCC Class I-II	LCC Class III	LCC Class IV-VIII
0	9.86	31.76
		45.63
0	9.86	77.39
0	0	20
Total Acres		
Project Size Scores		
Highest Project Size Score		20

Site Assessment Worksheet 2

Water Resources Availability

A	B	C	D	E
Project Portion	Water Source	Proportion of Project Area	Water Availability Score	Weighted Availability Score (C x D)
87.25	Metered (VCMWD)	1.0	95	95
		(Must Sum to 1.0)	Total Water Resource Score	95

Site Assessment Worksheet 3

Surrounding Agricultural Land and Surrounding Protected Resource Land

A	B	C	D	E	F	G
Zone of Influence						
Total Acres	Acres in Agriculture	Acres of Protected Resource Land	Percent in Agriculture (A/B)	Percent Protected Resource Land (A/C)	Surrounding Agricultural Land Score (From Table)	Surrounding Protected Resource Land Score (From Table)
1054.91	978.28	392.67	93	37	100	0

Final LESA Score Sheet

Calculation of the Final LESA Score:

- (1) Multiply each factor score by the factor weight to determine the weighted score and enter in Weighted Factor Scores column.
- (2) Sum the weighted factor scores for the LE factors to determine the total LE score for the project.
- (3) Sum the weighted factor scores for the SA factors to determine the total SA score for the project.
- (4) Sum the total LE and SA scores to determine the Final LESA Score for the project.

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
Land Capability Classification	20.3	0.25	5.10
Storie Index	15.9	0.25	4.00
<i>LE Subtotal</i>		0.50	9.10
SA Factors			
Project Size	20	0.15	3.00
Water Resource Availability	95	0.15	14.25
Surrounding Agricultural Land	100	0.15	15.00
Protected Resource Land	0	0.05	0
<i>SA Subtotal</i>		0.50	32.25
Final LESA Score			41.35