

AGRICULTURAL ANALYSIS

TM 5478/ER 06-08-017

Prepared for

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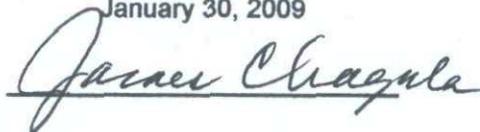
A handwritten signature in cursive script that reads "James Chagala". The signature is written in black ink and is positioned below the typed name and date.

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SUMMARY OF FINDINGS

The project, when compared to the appropriate Thresholds of Significance, will not have a significant impact to agriculture in San Diego County based upon the following findings

- The project will not result in the significant conversion of Prime Agricultural Farmland.
- The project will not result in the significant conversion of Prime Farmland or Farmland of Statewide importance.
- The project will not conflict with agricultural zoning or use regulations.
- The project will not result in a conflict with a County Agricultural Preserve.
- The project will not result in a conflict with a land conservation contract.
- The density proposed by the project will not have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.
- This project, in conjunction with other existing and proposed projects, would not have an impact to agriculture that is cumulatively considerable pursuant to the State CEQA Guidelines.
- This project has been determined to have an insignificant impact on agricultural resources through the application of the State of California Department of Conservation LESA Model.

I. INTRODUCTION

A. Overview of the Project:

This project proposes a 7 parcel Tentative Map (TM 5478 Rpl) on 17.71 acres gross. The parcels would range in size from 2.03 to 4.02 acres gross and have a density of one dwelling unit per 2.53 acres gross. The property is located the Central Valley Center Area (See Figure 1, Regional Location). More specifically, it is located 1.14 miles east of the intersection of Cole Grade Road and Fruitvale Road (See Figure 2, Community Location).

B. San Diego County General Plan and Zoning:

The property is within the Estate Development Area (EDA) Regional Plan Category of the San Diego County Regional Land Use Element (See Figure 3, Regional Category). It is located in the Valley Center Community Planning Area and has a plan designation of (17) Estate Residential (See Figure 4, Community Plan Designation). The property is currently classified with the A70 Use Regulation with a 2 acre minimum lot size (See Figure 5, Zone Classifications).

C. Characteristics of the Subject Property:

The property slopes from the south to northeast with elevations ranging from 1515 to 1622. There is a small ridge in this area which runs east and west, with the northern part of this property near the base of that ridge.

This property is essentially 100% in citrus. The citrus operation is currently showing a loss and a profit is not expected anytime soon and the applicant may phase out his agricultural operation in the near future.

D. Characteristics of the Surrounding Area

Land Use

Most of the surrounding area is level except for the north where it becomes more steep and rugged. Much of the surrounding area is in 2 to 4 acre parcels reflecting the General Plan and the Zoning. The area to the north is in generally larger lots with areas that were formally agriculture. To the east and south, there are primarily parcels in the 2 to 4 acre range and estate homes with some

remaining citrus. To the west parcels are also mostly 2-4 acres with a larger citrus grove in the neighborhood of 15-20 acres. Further to the northwest are nursery plants and greenhouses located within an agricultural preserve.

In terms of biology, almost all of the area is or has been in agriculture.

Zoning and General Plan

Zoning:

In terms of the surrounding area, all property within the vicinity is in an A70 zone. However, the minimum lot sizes vary from 2 acres, covering about 70% of the vicinity, to an area of 4 acres to the north and an area of 10 acres within the agricultural preserve to the northwest.

General Plan:

This property is located within the Valley Center Community Planning Area. In terms of the surrounding area, all of the property is located within the EDA Estate Development Area Regional Category with the exception of property to the northwest. This property has a Regional Category of ECA (Environmentally Constrained Area) on the area within the agricultural preserve. Additionally, all property with the exception of the northwest corner is in the 17 Estate Residential Plan Designation. Property to the northwest is located in the (20) General Agricultural Plan Designation.

E. Methods and Survey Limitations:

Study Area:

The study area includes the subject property to be developed, as well as all property within 1320 feet of the smallest rectangle encompassing the entire subject property (See Figure 6). The subject property comprises 17.71 acres of this area, while the remainder constitutes 340.5 acres for a total of 358.2 acres. Previous references to surrounding area refer to the same properties as the study area.

Method:

Agricultural uses and other land uses were determined through a combination of several sources. The primary source was a digitized aerial photo taken in

February of 2005. This photo was enlarged 800% so that agricultural areas as well as the types of agriculture could be identified. This was supplemented by discussions with the owner and field reviews. Please note that the measurements taken from the aerial photo are two-dimensional and do not account for topography. Therefore there may be slight deviations in some of the acreage figures in rough terrain. However, this method was deemed sufficiently accurate for the broad conclusions desired in this analysis.

Agricultural Areas Impacted were determined by superimposing the areas in agricultural use over the Tentative Map and using a digital planimeter to measure pads, driveways, and streets. Cuts and fills for streets and pads were also included in these measurements.

Soils information was determined through the San Diego County Important Farmland Map, produced by the California Department of Conservation, and the Soil Survey for the San Diego Area produced by the U.S. Department of Agriculture Soil Conservation Service.

Climatic Data was determined through use of the University of California Extension Service publication entitled Climates of San Diego County, Agricultural Relationships, as well as through use of the information provided in the above mentioned Soils Survey.

Limitations:

The method was limited by several factors. First, the latest available aerial photos were taken in February of 2005. Some new planting could have occurred since then. While this was not a problem for the subject property, but there may be some new plantings on other properties, not obvious from the field survey.

Second, acreages were measured through the use of a digital planimeter. All measurements were taken 3 times and the results averaged, in accordance with accepted practice for this type of instrument. For the broad assumptions of this report, this level of precision is more than sufficient. However, it should be understood that the acreage figures are only close approximations.

Thresholds of Significance:

A determination as to the degree of significance of the impact, if any, of each of the following thresholds shall be made. The results of these determinations are to be considered guidelines that, when viewed as a whole in the context of each project, will determine whether a project has a significant impact to agricultural resources.

1. The project will result in the conversion of the following:
 - a. Prime agricultural soils (i.e. an LLC rating I-II or soils rated as good in terms of fertility and suitability for the predominant crop in the vicinity).
 - b. Prime Farmland, Farmland of Statewide Importance, or Unique Farmland as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.
2. The Project will establish parcel sizes that cannot support future agricultural operations and are not consistent with other parcel sizes in the vicinity that currently support agriculture.
3. The project will result in a conflict with agricultural zoning or use regulations.
4. The project will result in a conflict with a County Agricultural Preserve.
5. The project will result in a conflict with a land conservation contract.

6. The density proposed by the project will have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.
7. This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulative considerable pursuant to the State CEQA Guidelines.
8. Application of the LESA Model indicates that the proposal will have a significant impact to agricultural resources.

II. SURVEY RESULTS

The following is the data generated through this survey with some preliminary analysis. Corresponding conclusions will be found in Section V.

A. County General Plan—Agricultural Designations:

The San Diego County General Plan has two designations devoted to agriculture. First is the (19) Intensive Agriculture designation, and second is the (20) General Agriculture designation. None of the study area is within the (19) Intensive Agriculture Designation. 30 acres lies within the (20) General Agricultural Designation.

B. County Agricultural Preserves:

There is one Agricultural Preserve on parcels within the study area totaling 30 acres. This is Agricultural Preserve #5B, and those parcels that lie within the study area are addressed in Subsection C below.

C. Land Conservation Contracts:

There are 2 parcels within the study area which are in an agricultural preserve, but only 1 is subject to a Land Conservation Contract (See Figure 7). This property is 19.11 acres in size and is under Land Conservation Contract AP 75-62. The Department of Planning and Land Use files show that then owner requested the filing of a Notice of Non-Renewal on March 12, 1989. However, there is no record in the file that the Board of Supervisors acted on this request.

This property is 1050 feet and 2 properties removed from the northern part of the subject property. Between the subject property and this parcel there are 6 parcels ranging in size from 1.65 to 2.58 acres, with 3 of the parcels under 2 acres, all of which are smaller or within the size range of the proposed parcels (See Figure 8). 4 of these parcels were created in the 1970's and two in the early 1990's. Therefore the subject property is separated from this parcel by 6 parcels that are equal to or smaller than the lots being proposed. In addition, those parcels have existed since at least 1992, are all developed, and have not had an apparent impact on the agricultural operation. Therefore, it would be logical to assume that the same would hold true for the parcels being proposed on the subject project.

In addition, there is an area of active citrus groves between the parcels previously described and the Land Conservation Contract. However, that property is divided into 9 lots between 2-4 acres. Thus there are actually 14 lots of 2-4 acres between the subject property and the property with the land conservation contract.

For this reason, it is concluded that the development of the subject property will not have conflict with the land conservation contract found in the study area.

D. Parcelization:

A review of parcelization within the study area indicates that there are 101 assessor's parcels within the study area, not including assessor's parcels created for roadways. Of the 101 parcels, 84 or 83% are in the classification of 2-4 acres or smaller, which is the range of parcels being proposed. These parcels are classified by size on Figure 9 and mapped on Figure 10.

The resulting minimum lot sizes would not be inconsistent with the allowed minimum lot sizes and character of the area.

E. Land Use:

In general terms, land uses in the study area are agriculture, vacant, or low-density residential/agricultural uses. The study area consists of 358.2 acres, and agricultural uses occupy approximately 86.6 acres or 24.2 % of the study area (See Figure 11). If the subject property is excluded, the study area has 340.47 acres, of which 68.9 acres or 20.2% is in active agriculture. 271.6 acres or 75.8% of the study area is currently not used for productive agriculture. Figure 11 also shows that there is adjacent agriculture only to the west, and that this agriculture is occurring on parcels in the same size range as those being proposed.

In terms of the subject property, all of the property is now in citrus. From a business standpoint, the citrus are not profitable and may soon be removed.

Thus the percentage of agriculture on the subject property is considerably higher than that which exists within the study area.

F. Direct Impact to Existing Agriculture

A review of the area to be graded in terms of building pads, driveways, and roads was conducted to determine the amount and type of agriculture that would be directly impacted by the proposed development.

Although this proposal is dependant upon septic tanks and the associated leach fields, the area occupied by the septic tanks and leach fields was not considered a direct impact. Additionally building limitation buffers were not considered direct impacts. This was done pursuant to Appendix G of the CEQA Guidelines which, in discussing an evaluation of Agricultural Resources, suggests the following questions:

Would the project

- a) Convert Prime Farmland, Unique Farmland, or Farmland of State of Statewide importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use?
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

A and C above relate to the conversion of agricultural land to a non-agricultural use. The surface above the leach fields can continue to be used for agricultural purposes as long as root crops such as potatoes or carrots are not grown and, in fact, are highly suitable for agriculture because of the additional moisture and nutrients that will be in the soil. Therefore, placement of leach fields on the subject property will not result in the conversion of any lands to a non-agricultural use, and thus the leach fields were not considered a direct impact to agriculture.

There are currently 17.71 acres of citrus, which constitutes all of the property (See Figure 12). This development will result in 4.8 acres of direct impacts to existing citrus. This constitutes 27.3% of the citrus on site, and after development, there will be 12.83 acres or 72.7% of the citrus remaining.

G. Soils

Soil Conservation Service:

The U.S. Department of Agriculture, Soil Conservation Service has prepared a Soil Survey for San Diego County. According to this survey there are four major soils types, making up approximately 84% of all the soil formations within the study area, (See Figure 13), and they are described below. There are also five soils types occupying less significant amounts of acreage within the study area that have not been discussed:

- FaD2: Located in the central and western portions of the study area, this Fallbrook Sandy Loam is located on 9 to 15% slopes.. It occupies approximately 112.2 acres, or 33% of the study area. This soil formation is also found in the central portion of the subject property, and comprises 4.95 acres or 30% of the subject property. This strongly-sloping soil is 27 to 57 inches deep over rock. The runoff is medium, and the erosion hazard is moderate. This soil is rated as fair for avocados, citrus, tomatoes, and flowers, and not suitable for truck farming and is rated as medium in fertility. The Capability Rating for this soil is IVE-1 (19); Loamy range site.
- VaB: Located in the central and southern portions of the study area, this Visalia Sandy Loam soil is on 2 to 5% slopes. It occupies approximately 81.5 acres or 24% of the study area. This soil formation is also located in the central and southern portions of the subject property, and occupies approximately 11.8 acres or 66.5% of the subject property. The fertility of this gently sloping soil is rated as "high," the runoff rate is slow, and the erosion hazard is slight. The Survey indicates that this soil is rated as good for truck crops, avocados, citrus, flowers and fair for tomatoes. The Capability Rating for this soil is IIe-1 (19).
- FaE2: This is a Fallbrook sandy loam formation eroded on slopes of 15-30% and occupies 47.5 acres or 15% of the entire study area. This soil also occupies .78 acres, or 4% of the subject property. The location of this formation is found in the northern portion of the study area. This soil is not suited for truck crops, tomatoes or flowers. This soil is rated as fair for avocados because of the soil's surface layer texture. This soil is also rated as fair citrus because of its permeability rate. It has been classified as a VIe-1(19) Capability Rating. Soils in this Capability Rating are rated as low to medium in fertility.
- CnG2: Located in the northern portion of the study area, this Cieneba-Fallbrook rocky sandy loam is found eroded on 30 to 65% slopes. It occupies approximately 42.2 acres or 12.4% of the study area. It is not found on the subject property. This soils type is characterized by large boulders and rock outcroppings covering approximately 20% of the surface. The runoff is rapid to very rapid, and the erosion hazard high to very high. The Survey reports that this soil is fair for avocados and unsuitable for other rated crops. Its fertility is rated as low to medium. The Capability Rating for this soil is VIIe-7 (9).

One soil (VaB) is good for growing avocados, citrus, and truck farming. However, no other soil considered good for growing any of the crops listed in the soils report. 2 of the soils are rated as fair for avocados and citrus and one is not suitable for all crops except for avocados. Thus while one of the soils is highly suitable for crops grown in the vicinity, the other three soils are rated medium to poor. The other three occupy 76% of the study area and 33.5% of the subject property.

In terms of fertility, again, one of the soils is rated high in fertility, while 2 are rated as medium and one is rated as low. Thus, overall the fertility of the soils for the study area would be rated slightly higher than medium while the soils of the subject property would be considered high in fertility.

26.4% of the VaB soil will be impacted through this development, leaving 75.6% of this soil available for agriculture in the future.

H. *Important Farmlands:*

The California Department of conservation has classified land in California into seven "Important Farmlands Categories." Annotated definitions of the relevant classifications are found below.

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 nonirrigated fruits and vegetables as found in some climatic zones in California.

Farmland of Local Importance: Land that meets all the characteristics of prime and statewide, with the exception of irrigation.

Urban and Built-up Land: Residential land with a density of at least six units per ten-acre parcel, as well as land used for industrial and commercial purposes, golf courses, landfills, airports, sewage treatment, and water control structures.

Other Land: Land which does not meet the criteria of any other category.

There are also Categories of Grazing Land, Other Land, and Water that have not been defined.

Figure 14 indicates that only 2 Important Farmland Categories are found on the subject property. Light green represents "Unique Farmland", and dark green represents "Prime Farmland." These two categories are also located in the study area, along with the category of, "Other Lands" which is identified with gray coloring, "Urban" which is identified with red coloring, and "Farmland of Local Importance" which is identified by off-white coloring. These categories are discussed below in greater detail as they relate to the study area and subject property.

Prime Farmland:

42.63 acres or 12.6% of the study area is in the Prime Farmland Category. This category is located in the central, far south and southeastern portions of the study area. 9.56 acres or 54% of the subject property lies in this category.

Unique Farmland:

97.16 acres or 28.7% of the study area is in the Unique Farmland Category. This category is located mainly in the central and northern portions of the study area. 8.15 acres or 46% of the subject property lies within this category.

Farmland of Local Importance:

73.2 acres or 21.6% of the study area is in the Farmlands of Local Importance Category. This category is found in the northern, western and southern portions of the study area. This type of land is not located on the subject property.

Other Land:

103.4 acres or 30.6 % of the study area is in the Other Land Category. This Category is found in the eastern, western and northern portions of the study area. This type of land is not located on the subject property.

Urban Land:

22.01 acres or 6.5% of the study area is in the Urban category. This category is found in the southwestern portion of the study area. This type of land is not located on the subject property.

The Important Farmlands Categories of Prime and Statewide Importance are the two most valuable classifications. There is no Farmland of Statewide importance in the study area or on the subject property. Prime Farmland covers 12.6% of the study area and 54% of the subject property. The Unique Land Category is placed upon land which does not meet the requirements of Prime Farmland or Farmland of Statewide Importance, but is under cultivation. Thus in order to qualify as Unique Land, the land need only be under or have a history of cultivation. Unique Farmland covers 28.7% of the study area and 46% of the subject property.

22.4% of the Prime Farmlands will be impacted through this development, leaving 77.6% of this farmland available for agriculture in the future.

J. Micro Climate:

Information for Micro Climates in San Diego County is contained in the Climates of San Diego County Agricultural Relationships, published by the University of California Agricultural Extension Service. At the time of the publication of this document, the nearest Weather Reporting Station to the Subject Property was Valley Center 3N. This Weather Station is located approximately 7000 feet to the southeast of the Subject Property.

The closest Weather Station to the subject Property is the Valley Center 3N station, but a complete record is not available for this Station. The next closest Weather Station is the Escondido Weather Station. Information not available for the Valley Center Station will be supplemented by the information provided by the Escondido station.

The Escondido Weather Station indicates an annual average maximum mean temperature of 76.2 degrees with an extreme high of 108 degrees and an extreme low of 17 degrees. The Valley Center Station reports an average rainfall of 16.09" with 11.47" coming during the months of December, January, February and March. The estimated date of the first freeze from the Valley Center Weather Station was December 1st and the last estimated freeze is April 1st.

Thus, the mildness of the microclimate of this area would be advantageous to the growing of semi-tropical crops.

K. Facilities:

Imported Water is available from the Valley Center Municipal Water District, and there is water available for agricultural purposes.

L. San Diego County Agricultural Production:

The County of San Diego County Department of Agriculture, Weights and Measures produces an annual report regarding Crop Statistics for San Diego County. According to the 2005 report, there are 6,649 acres planted with oranges in San Diego County. As part of a long term trend, this is a decrease of 191 acres over the 2004 totals.

This proposal will directly impact 4.8 acres of the County's orange plantings. This amounts to .07% of the acreage of oranges planted as of 2005. Thus this proposal will not result in a significant decrease to the total County agricultural production of oranges. Additionally, there has been a reduction in acreages devoted to oranges in San Diego County for a number of years.

M. Pesticides:

Pesticide users are required to register with the County and keep pesticides confined to the property on which they are being used with no significant drift. The drift of pesticides can be harmful for adjacent agricultural uses as well as residential uses. Pesticides that drift onto adjacent crops can then show up in the fruit of that crop. If the adjacent owner has not registered for using that pesticide, that owner could be cited for a pesticide violation and the crop lost. Additionally the drift could bring a pesticide in contact with a plant that could be harmed by the pesticide.

Thus it is important that a pesticide user confines the substance to his property and uses them responsibly, whether it is used for agriculture or residences.

As stated above, pesticide users are now required to confine their pesticides to their property and not produce any significant drift. Additionally all buyers are required to be notified in writing and to acknowledge by signature that there may be agricultural uses nearby that may expose the buyer to irritations and inconvenience. (See "N" below.)

Thus the subject property will not result in a conflict between pesticide use and future residents

N. Property Disclosure Ordinance:

The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require 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.

P. LESA Model

The California Land Evaluation and Site Assessment Model has been developed by the California Department of Conservation, Office of Land Conservation. This Model is a methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process.

The results of the application of this model to the subject property, as well as the supporting worksheets, are provided in Appendix A. According to this model, a final score under 40 points is not considered significant, and a score of 40-59 is considered significant only if both the Land Evaluation and Site Assessment score are more than 20. The final score for the subject property is 51.4, however the Site Assessment Score is 17.25 and is thus below 20. Therefore the final score is below the threshold established by the State of California for a finding of a significant impact to agriculture.

III. CUMULATIVE IMPACT

Section 15130(a) of the State CEQA Guidelines states that cumulative impacts of a project should be discussed when the project impacts, even though individually limited, are cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The following questions are listed in the CEQA Guidelines, Appendix G and are to be considered in evaluating cumulative agricultural impacts. The first three questions have been previously addressed in this report, while the last question will be addressed in detail in this Section.

1. *Would the project convert 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, to nonagricultural use?*

9.56 acres of the subject property are classified as Prime Farmland, of which 2.14 acres or 22.4% are being directly impacted, leaving 77.6% of the prime farmlands still available for agricultural use. 8.15 acres of the subject property is shown as Unique Farmland. Unique Farmland is a classification applied to existing agricultural land. A review of the design of TM 5478 indicates that the pads and new roads proposed through this project would impact 2.03 acres of Unique Farmlands on the property, leaving 6.12 acres or 75.1% of the Unique Farmlands available for future agriculture. There are no Farmlands of Statewide Importance on the property

2. *Would the project conflict with existing zoning for agricultural use or a Williamson Act Contract?*

There is an agricultural use regulation on the subject property, as well as the surrounding property. However, this use regulation is not an exclusive agriculture zone, and permits a variety of uses. There is no use proposed for the project that would not be permitted in the agricultural zones surrounding it.

19.11 acres of the study area is within the Agricultural Preserve #5b. This property is 1050 feet and 2 properties removed from the northern part of the subject property. Between the subject property and this parcel there are 6 parcels ranging in size from 1.65 to 2.58 acres, with 3 of the parcels

under 2 acres, all of which are smaller or within the size range of the proposed parcels. 4 of these parcels were created in the 1970's and two in the early 1990's (See Figure 8). Therefore the subject property is separated from this parcel by 6 parcels that are equal to or smaller than the lots being proposed. In addition, those parcels have existed since at least 1992, are all developed, and have not had an apparent impact on the agricultural operation. Therefore, it would be logical to assume that the same would hold true for the parcels being proposed as the subject project.

In addition, there is an area of active citrus groves between the parcels described and the Land Conservation Contract. However that property is also divided into 9 lots between 2-4 acres. Thus there are actually 14 lots of 2-4 acres lying between the subject property and the land conservation contract.

Finally a County Ordinance requires new buyers of parcels in areas with agriculture nearby to sign a statement that they are aware of the irritations that may occur as a result of the existing agricultural operations.

Thus the determination is the project will not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

3. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use?*

The conclusion of this analysis is that changes in the existing environment, which, due to their location or nature, will not result in the conversion of farmland to nonagricultural use.

This conclusion is based upon the following points.

- a. Only one of the pads will be within 50 feet of an adjacent agricultural operation. Thus there will be ample separation of the development on this property with the nearest agricultural uses.
- b. The surrounding area has already partially developed into estate sized residential lots. A review of parcelization within the study area indicates that there are 84 assessor's parcels that are within the same acre range as what is being proposed. Thus the environment that exists, one of a mixture of agricultural uses and estate residential uses, will not be changed through the development of this parcel.

estate residential uses, will not be changed through the development of this parcel.

- c. The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist nearby on 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 due to the small amount of agricultural land adjacent to the property, the number of existing parcels already in the size range of those proposed, and the requirement that each perspective owner must sign a statement that they are aware of new agricultural operations, it is the conclusion that there will be no changes to the environment that would result in the conversion of farmland to non-agricultural use.

4. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

As a part of the agricultural analysis, a study was done to determine if this project, combined with other projects in the vicinity, would have an impact that is cumulatively considerable. This was determined by reviewing projects that have been recently approved or are contemplated to be approved in the near future, and adding the results to the impacts of the subject property.

A. Methodology:

An area was chosen that would function as a cumulative study area. The boundaries of this area were established by reviewing features of the landscape, which may isolate agricultural 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 cumulative study area was superimposed on the San Diego County GIS Discretionary Permit Map. This map indicates Major and Minor Subdivisions, Major Use Permits, General Plan Amendments (GPA's), and

Plan Amendment Authorizations (PAA's) both requested and approved since approximately January of 1999. Major Use Permits for cellular antenna sites were not included due to the very small area that is affected with these projects. This results in a gross number of projects of any type in the study area. In this way the selected projects could be identified that had been approved and were contemplated over the last 5.5 years.

A map of the cumulative study area was overlain with the County Vegetation Map to determine which of the selected projects identified in the study area occurred on lands used for agriculture. To make this determination, any project occurring on vegetation classified as agriculture or developed and disturbed land was considered. Disturbed and developed land was considered because the land may have originally been in agriculture, with the developed classification being a result of the selected projects. Since the GIS Map only used points to identify projects, any projects even remotely close to agriculture or urban vegetation types was considered.

The next step was to identify those approved and proposed projects that are occurring on land currently used for agriculture that have or would have an effect on principal farmlands within the cumulative study area. (For purposes of this study, the term "principal farmlands" refers to the land referenced in question one of the CEQA Guidelines, reproduced on the first page of this Section. These lands would include Prime Agricultural Lands, Agricultural Lands of Statewide Importance, and Unique Farmlands per the California Department Important Farmlands Map 2002). This was done by overlaying the cumulative study area with the appropriate portions of the important farmlands map. Projects not within a principal farmland were also eliminated from consideration. As above, the GIS Map only used points to identify projects, and selected projects even remotely close to principal farmlands were considered.

The plot plans and maps for those projects meeting both of the above tests were then obtained from the County Project Processing Counter (For purposes of this study, this last grouping of projects will be termed "Selected Projects"). The maps were then superimposed on the vegetation and farmlands maps to determine the principal farmlands in agriculture that were affected. The effects to the subject property could then be added to the approved and proposed agriculture lands affected through selected projects. This could be compared with the land in agriculture for the County as a whole. In this way a determination could be made if the cumulative impact of the selected projects in the cumulative study area was having a cumulatively considerable impact to agriculture in San Diego County as a whole.

The data within this report was based upon the County GIS Discretionary Permit Map dated August 10, 2006. It is understood that prior to the public hearing, the discretionary permits will be reviewed in light of updated maps. At that point, it will be decided if there are changes that warrant disclosure to the decision making body.

B. The Cumulative Analysis:

The subject property is located in the northeast part of the Valley Center Community Planning Area. Due to the uniformity of terrain and uses for agriculture in Valley Center, the cumulative study area was established, which encompasses very nearly all of the Community Planning Area, minus some of the steep areas on the fringes. It is some 45,656 acres in size and is shown on Figure 16.

The County General Plan shows regional categories of Estate Development (EDA) over a large majority of the area, but it also includes large areas of Environmentally Constrained Area (ECA) where there are County Agricultural Preserves. The General Plan Designation for this area is primarily (17) Estate Residential with areas of (18) Multiple Rural Use along the perimeter where the slopes are steeper. Additionally, there are areas of (20) General Agriculture over the County Agricultural Preserves and (21) Specific Plan Areas. Finally the areas within the 2 nodes of the Country Town have a mixture of industrial, commercial, and (2) residential designations.

Zoning in this area is primarily A70 with a minimum parcel size of 2 acres per dwelling unit. Where slopes are steeper, there are areas of 4 and 8 acres minimum parcels sizes, and 10-acre minimum parcel sizes for areas within a County Agricultural Preserve.

Much of Valley Center has developed into 2-acre parcels in accordance with the (17) Estate Residential Plan Designation and the 2-acre zoning, which covers most of the area. Development within the Country Town has been arrested for a number of years because of the lack of public sewers and a high groundwater table in the central portion of the area.

About 45% of the cumulative study area is used for agriculture, or roughly 20,500 acres. There are also large areas to the south and east and scattered throughout the cumulative study area that are vacant. The remainder of the area is either vacant or has estate homes on lots larger than 2 acres. Agriculture in this area is primarily avocados, with some remaining citrus and also small areas of intensive truck farming and nursery stock.

The area immediate to the subject property is about 20% in agriculture. Zoning in the area is almost entirely A70, with 83% of the parcels in the area up to 2-4 acres in size, and many of these supporting agriculture.

The prices for citrus products have been flat for the last 10 years. There is now competition from Australia and also parts of Mexico. In addition, *historically one of the largest markets has been Hong Kong, which is now making its citrus purchases from mainland China.* As a result, most citrus operations now have a negative cash flow and are being removed or are no longer maintained. There are virtually no new plantings of citrus on a large scale.

Climate in this region is similar to the inland San Diego County with slightly more rainfall and more extremes in climate than the coastal area. However, the climate is still very mild and the mild nature is the primary reason for the agriculture that exists in the cumulative study area.

About 15,526 acres, or 34% of the soils in the cumulative study area are classified as principal farmlands. Of the total, 13,595 acres are classified as "unique farmland" by the California Department of Conservation because of the existing agriculture. There are also areas of prime farmland located in the eastern portions of the cumulative study area and farmland of statewide importance scattered in small amounts throughout the area. Generally the quality of soils in this area varies from non-arable to fair, with the better soils found in the central valley. As indicated in the previous paragraph, climate plays a more important role in the agricultural development of this area than the soils.

Water is currently provided through groundwater or by the Valley Center Municipal Water District, and water is available for agriculture.

In summary, about 45% of the cumulative study area is in some sort of agriculture, and both the zoning and the current general plan reflect this use. *Soils are limited in most of the area, and the pricing trends for citrus and to some extent avocados cloud the future agricultural use of this area.*

After reviewing subdivisions that met the criteria described under "Methodology," it was determined that 36 selected projects were occurring on lands that were being used for agriculture and were on a principal farmland as previously defined including the subject property. Appendix B has a listing of the initial group of subdivisions, those in agricultural or urban vegetation types, and those having one of the three Farmlands classifications. The selected projects affect 900.25 acres of the Principal Farmlands and are listed with acreages in Appendix C. Figure 15 indicates the location of the selected projects.

C. Agriculture in San Diego County:

According to the Department of Conservation, the following acreages of principal farmlands in San Diego County existed as of 2004:

Prime Farmland	8,525
Farmland of Statewide Importance	12,181
Unique Farmland	55,566
Total	76,272

This represents a reduction of 4101 acres or 5.1% in principal farmlands between 2002 and 2004. However, the 2005 Crop Statistics and Annual Report of the County of San Diego Department of Weights and Measures (the latest statistics available) indicate that within the period from 2004 to 2005 there was an increase of 6,742 acres in agricultural lands. Thus while there was a decrease in the principal farmlands, the County is experiencing an increase in overall agricultural acreage.

D. Summary

The lot sizes as proposed under TM 5478 are consistent with other lots in the cumulative study area. Additionally, after pads, driveways, and roads are subtracted, there will still be 72.7% of this property available for future agriculture uses.

In terms of the principal farmlands found in the cumulative study area, the 36 selected projects meeting the parameters of this study described above will impact only 5.80% of the principal farmlands found in the cumulative study area.

Additionally, In terms of cumulative effect to San Diego County, the 36 selected projects meeting the parameters of this study amounts to a cumulative total of 900.25 acres. This amounts to a total of 1.2% of the Principal Farmlands in San Diego County.

As mentioned above, the proposed project will allow for the future use of approximately 72.7% percent of the subject property for agricultural activities. With this availability of land for agricultural use, as well as the increase in overall agricultural acreage in San Diego County from 2004 to 2005, the project will not result in a cumulative impact to agricultural acreage within the region.

IV. ANALYSIS OF IMPACTS

It has been determined that due to the characteristics of the subject property as well as the surrounding area, there will not be a significant impact to agricultural resources as a result of the implementation of this project. This is based upon an assessment of the threshold standards established in Section I, recommended mitigation, as well as other points as described below.

Thresholds of Significance:

1. The project will result in the conversion of the following:

- a. Prime agricultural soils (i.e. an LLC rating I-II or soils rated as good in terms of fertility and suitability for the predominant crop in the vicinity).

One of the soils on the subject property is rated as a prime agricultural soil, and rated as good in terms of suitability for avocados, citrus, and truck farming. This soil covers 11.8 acres or 66.5% of the subject property and is rated high in fertility. Direct impacts to this soil would be 3.11 acres, leaving 8.68 acres or 75.6% of this soil available for future agriculture.

Since 75.6% of the prime agricultural soils will not be converted to a non-agricultural use, this threshold has not been exceeded.

- b. Prime Farmland, Farmland of Statewide Importance, or Unique Farmland as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

9.56 acres of the subject property are classified as Prime Farmland, of which 2.14 acres or 22.4% are being directly impacted. This will leave 77.6% of the Prime Farmland still available for agricultural use. 8.15 acres of the subject property is shown as Unique Farmland. Unique Farmland is a classification applied to existing agricultural land. A review of the design of TM 5478 indicates that the pads and new roads proposed through this project would impact 2.03 acres of Unique Farmlands on the property, leaving 6.12 acres or 75.1% of the Unique Farmlands available for future agriculture. There are no Farmlands of Statewide Importance on the property.

Considering that there are no soils of statewide importance on this property, that 77.6% of the prime farmland and 75.1% of the unique farmland will remain available for future agricultural uses, it has been determined that this threshold has not been met.

2. The Project will establish parcel sizes that cannot support future agricultural operations and are not consistent with other parcel sizes in the vicinity that currently support agriculture.

The density requested would result in an average parcel size of 2.53 acres. It has been stated by the San Diego County Department of Agriculture, Weights, and Measures that there are over 600 citrus farms in San Diego County under 2 acres in size, and it can be presumed that parcels of the size proposed for the subject property would be able to support agriculture.

Thus this threshold has not been exceeded. The parcels that would be permitted by this project would be capable of supporting agriculture.

3. The project will result in a conflict with agricultural zoning or use regulations.

There is an agricultural use regulation on the subject property as well the surrounding property. However, this use regulation is not an exclusive agriculture zone, and permits a variety of other uses. There is no use proposed for the project that would not be permitted in the agricultural zones surrounding it. Thus the determination is that this threshold has not been exceeded and the project will not result in significant impacts in terms of conflicts with agricultural zoning.

4. The project will result in a conflict with a County Agricultural Preserve.

There is one Agricultural Preserve on parcels within the study area totaling 30 acres. This is Agricultural Preserve #5B, and the parcels within the study area are addressed in Subsection 5 below. For those reasons given, it has been determined that this threshold has not been met.

5. The project will result in a conflict with a land conservation contract.

19.11 acres of the study area is within the Agricultural Preserve #5b. This property is 1050 feet and 2 properties removed from the northern part of the subject property. Between the subject property and this parcel there are 6 parcels ranging in size from 1.65 to 2.58 acres, with 3 of the parcels under 2 acres, all of which are smaller or within the size range of the proposed parcels. 4 of these parcels were created in the 1970's and two in the early 1990's (See Figure 8). Therefore the subject property is separated from this parcel by 6 parcels that are equal to or smaller than

the lots being proposed. In addition, those parcels have existed since at least 1992, are all developed, and have not had an apparent impact on the agricultural operation. Therefore, it would be logical to assume that the same would hold true for the parcels being proposed as the subject project.

In addition, there is an area of active citrus groves between the parcels described and the Land Conservation Contract. However that property is also divided into 9 lots between 2-4 acres. Thus there are actually 14 lots of 2-4 acres lying between the subject property and the land conservation contract.

Finally a County Ordinance requires new buyers of parcels in areas with agriculture nearby to sign a statement that they are aware of the irritations that may occur as a result of the existing agricultural operations.

Thus this threshold has not been exceeded.

6. The density proposed by the project will have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.

This threshold has not been met based upon the following points.

- a. *The surrounding area has already partially developed into estate sized residential lots. A review of parcelization within the study area indicates that there are 84 assessor's parcels that are within the same acre range as what is being proposed. Thus the environment that exists, one of a mixture of agricultural uses and estate residential uses, will not be changed through the development of this parcel.*
- b. *The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist nearby on 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 due to the number of existing parcels already in the range of what would be permitted by the density requested, and the requirement that each prospective owner must sign a statement that they are aware of new agricultural operations, it is the conclusion that there will be no adverse impacts to agriculture in the surrounding area.

7. This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulative considerable pursuant to the State CEQA Guidelines.

In terms of a cumulative effect to the cumulative study area, the subject property will add 4.8 acres or an additional .04% of agriculture affected to the cumulative study area. Additionally, the parcels are sized so they are consistent with the development as planned by the General Plan and zoning. They are also consistent with other lots in the cumulative study area.

In terms of the principal farmlands found in the cumulative study area, the 36 selected projects meeting the parameters of this study described above will impact only 5.80% of the principal farmlands found in the cumulative study area.

Considering that TM 5478 will result in 72.1% of the site being available for agriculture after development, and the fact that the overall agricultural acreage in San Diego County increased over 6,000 acres from 2004 to 2005, there will clearly not be a cumulatively considerable impact to agricultural resources to San Diego County as a result of the development of the subject project.

8. Application of the LESA Model indicates that the proposal will have a significant impact to agricultural resources.

The California Land Evaluation and Site Assessment Model has been developed by the California Department of Conservation, Office of Land Conservation. This Model is a methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process.

The results of the application of this model to the subject property, as well as the supporting worksheets, are provided in Appendix A. According to this model, a final score under 40 points is not considered significant, and a score of 40-59 is considered significant only if both the Land Evaluation and Site Assessment score are more than 20. The final score for the subject property is 51.4, however the Site Assessment Score is 17.25 and is thus below 20. Therefore the final score is below the threshold established by the State of California for a finding of significance.

The impacts on agricultural resources are not considered significant according to the LESA model; therefore, the project will have a less than significant impact on agricultural resources.

V. FIGURES

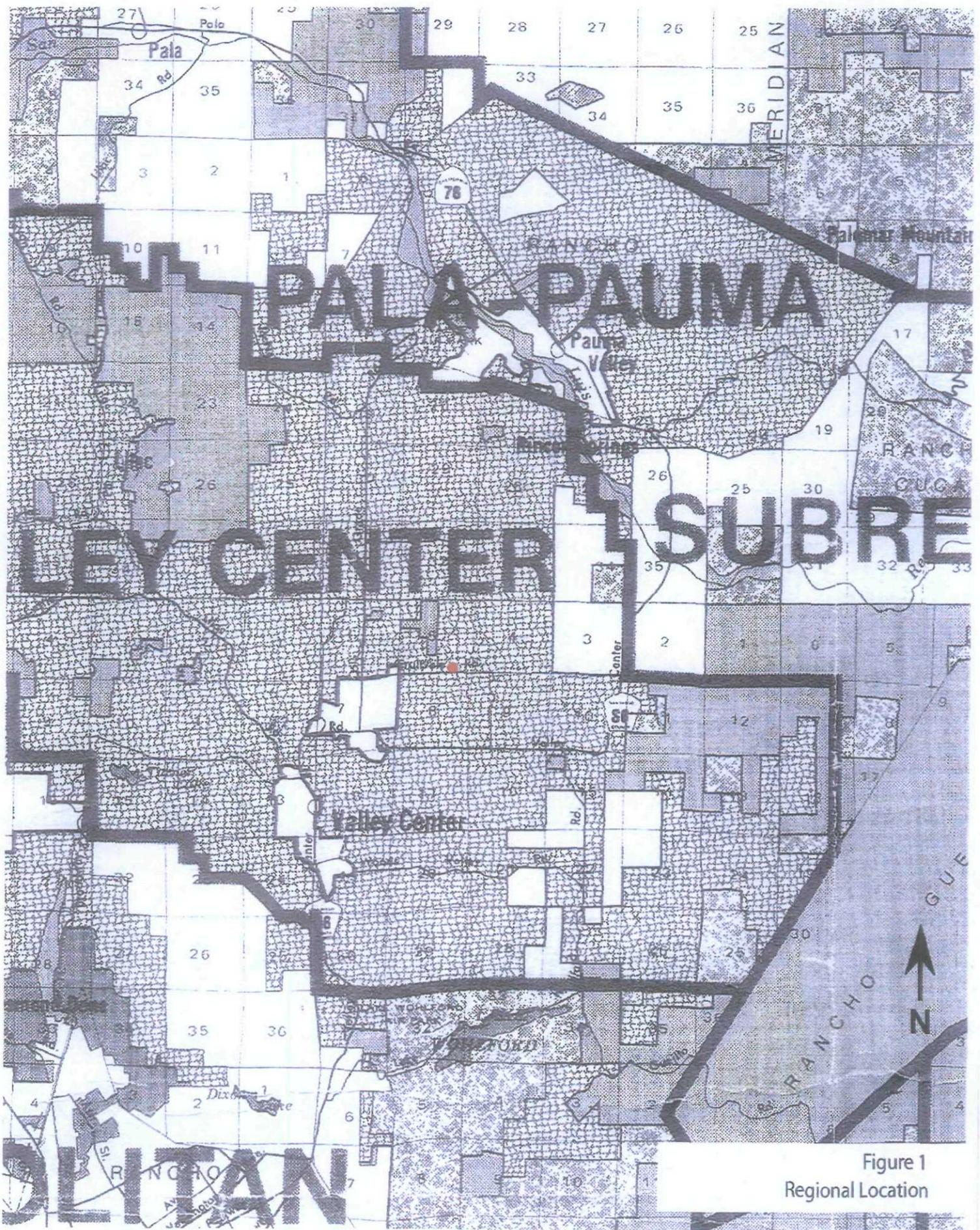


Figure 1
Regional Location

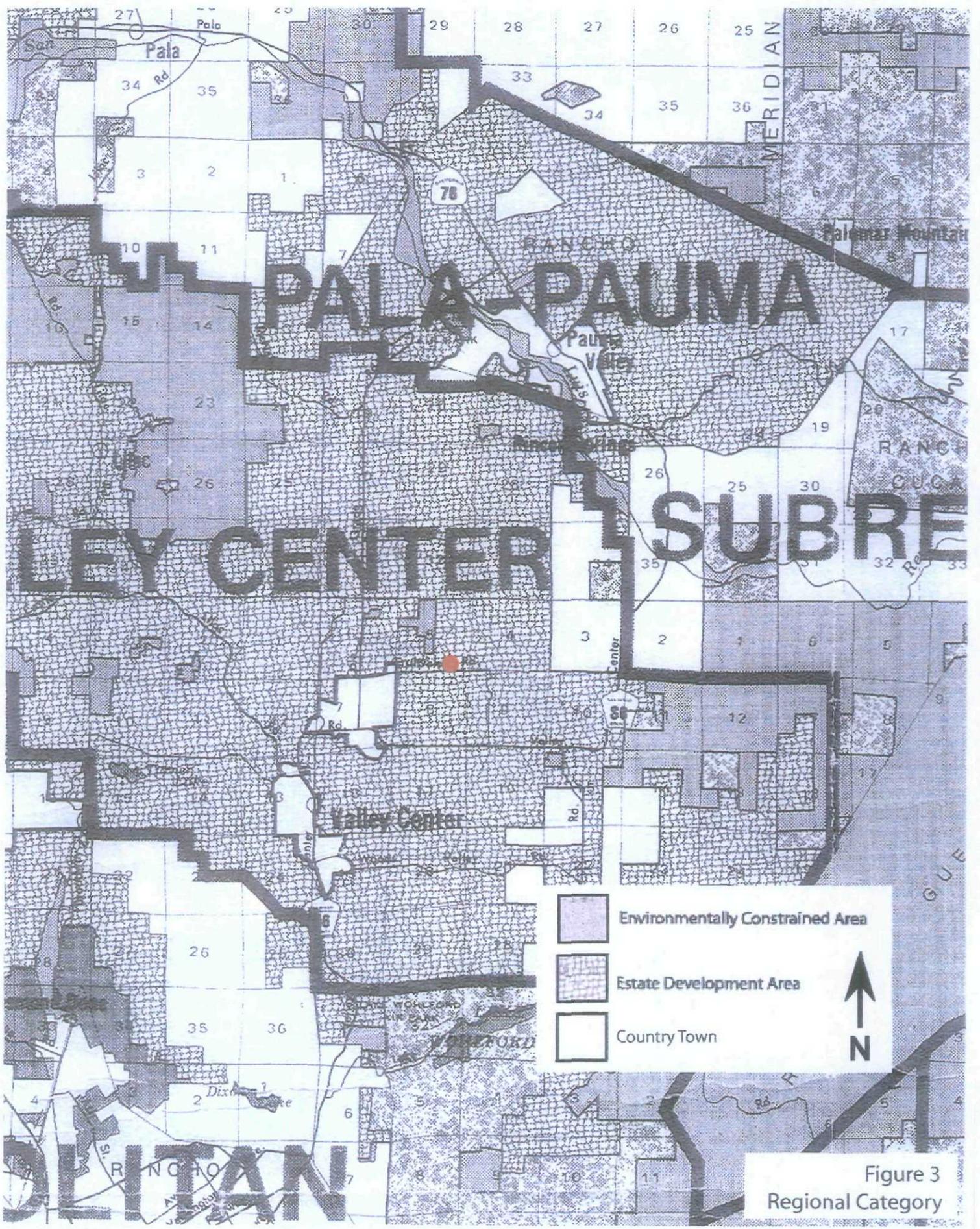


Figure 3
Regional Category

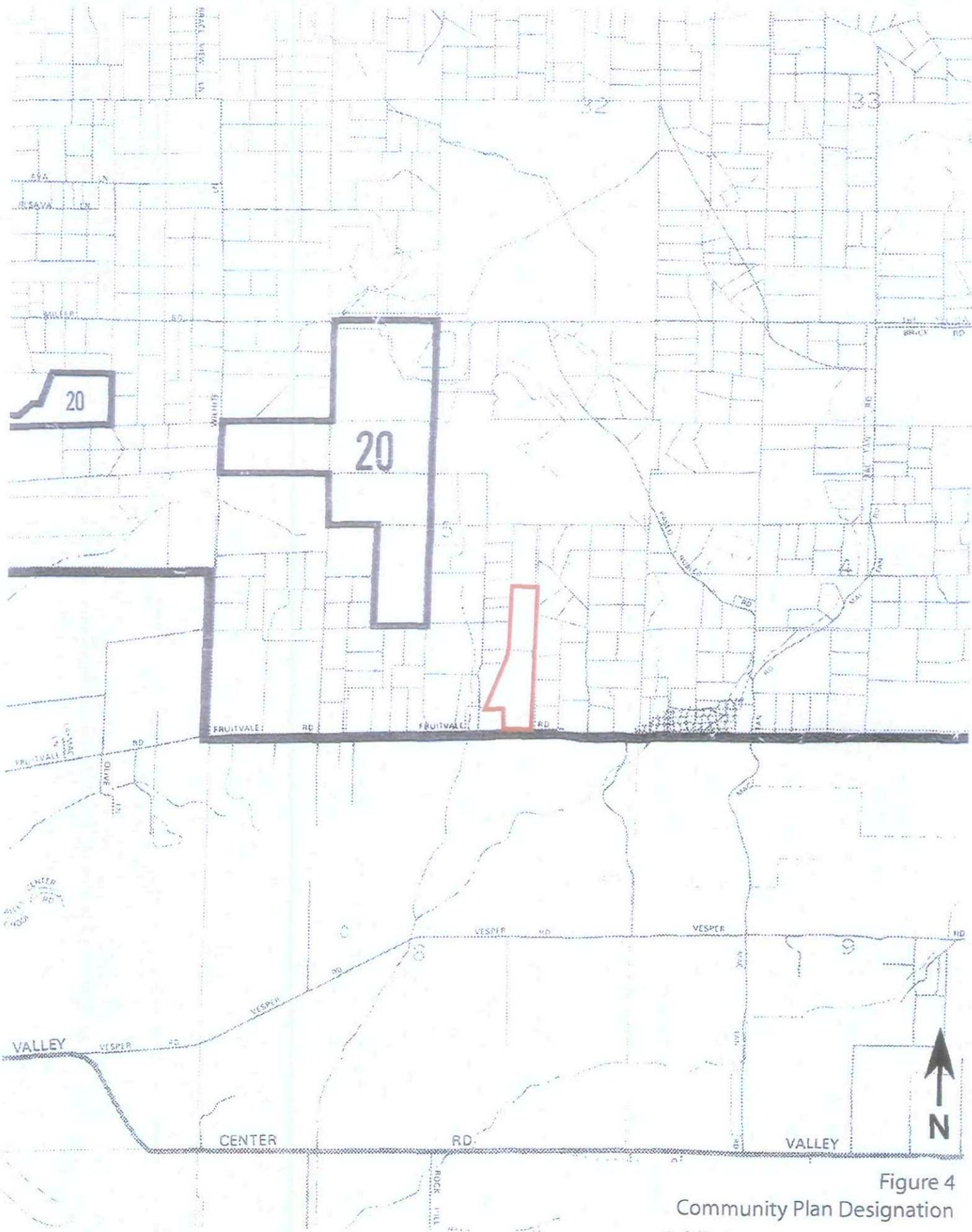


Figure 4
Community Plan Designation

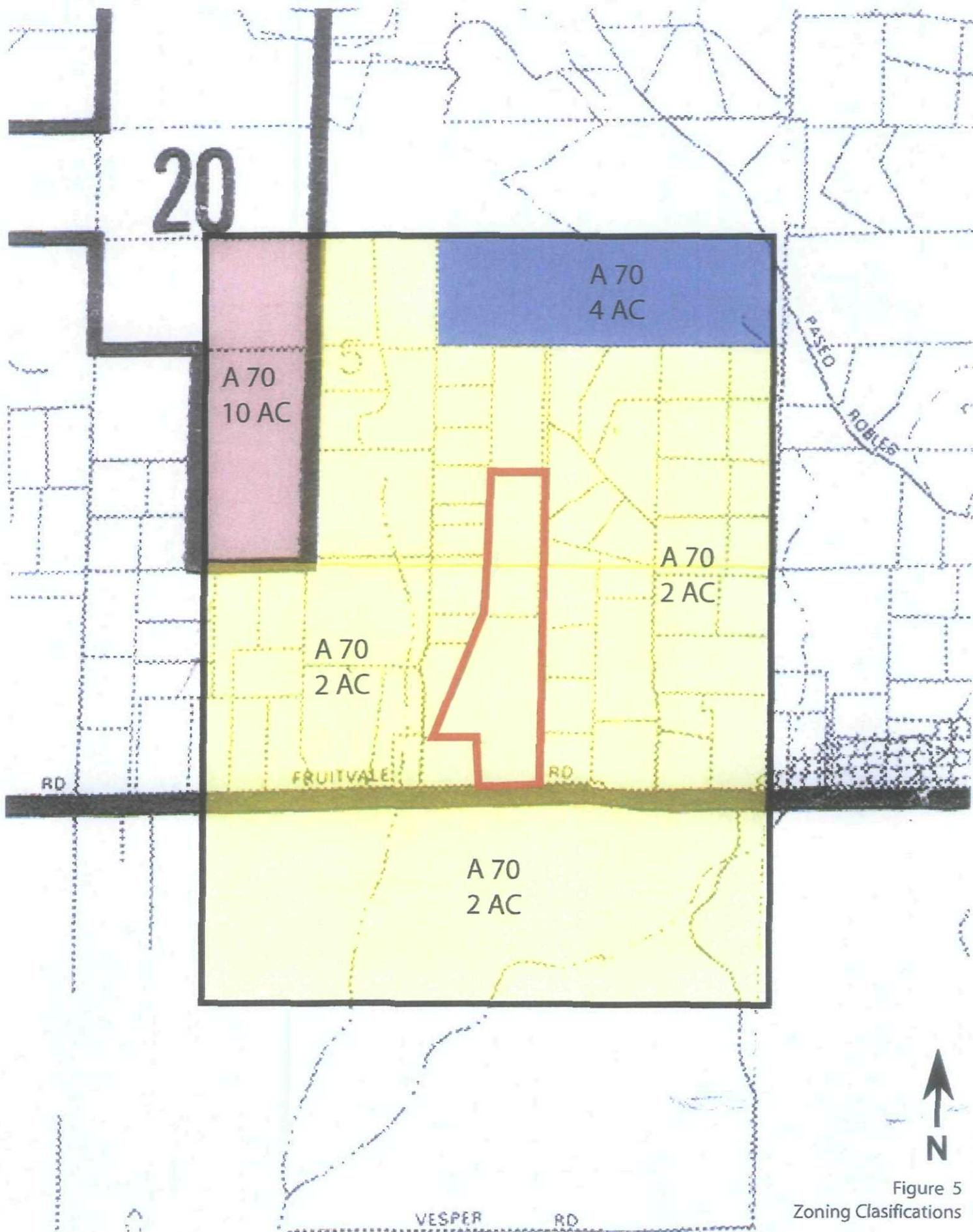


Figure 5
Zoning Classifications

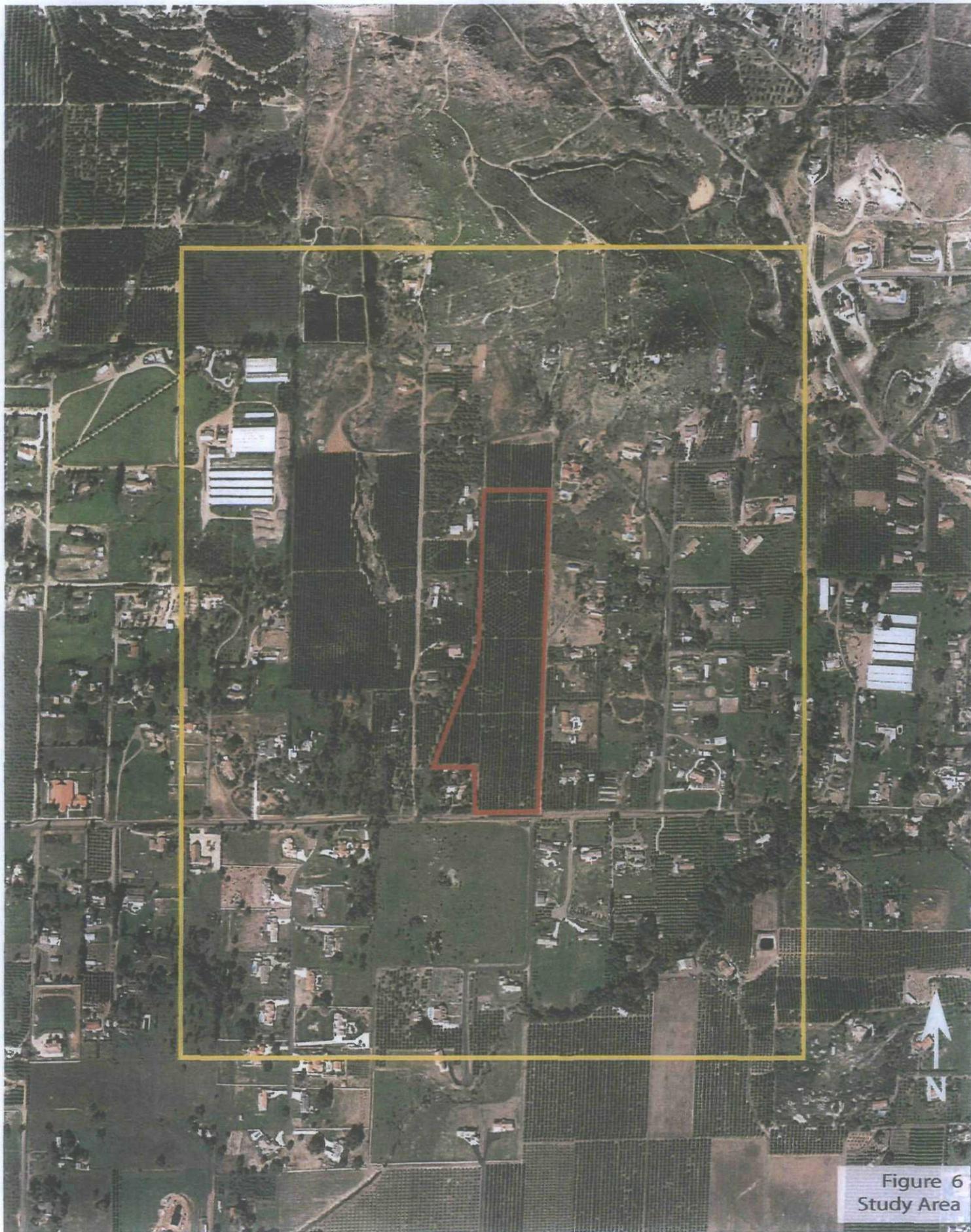


Figure 6
Study Area

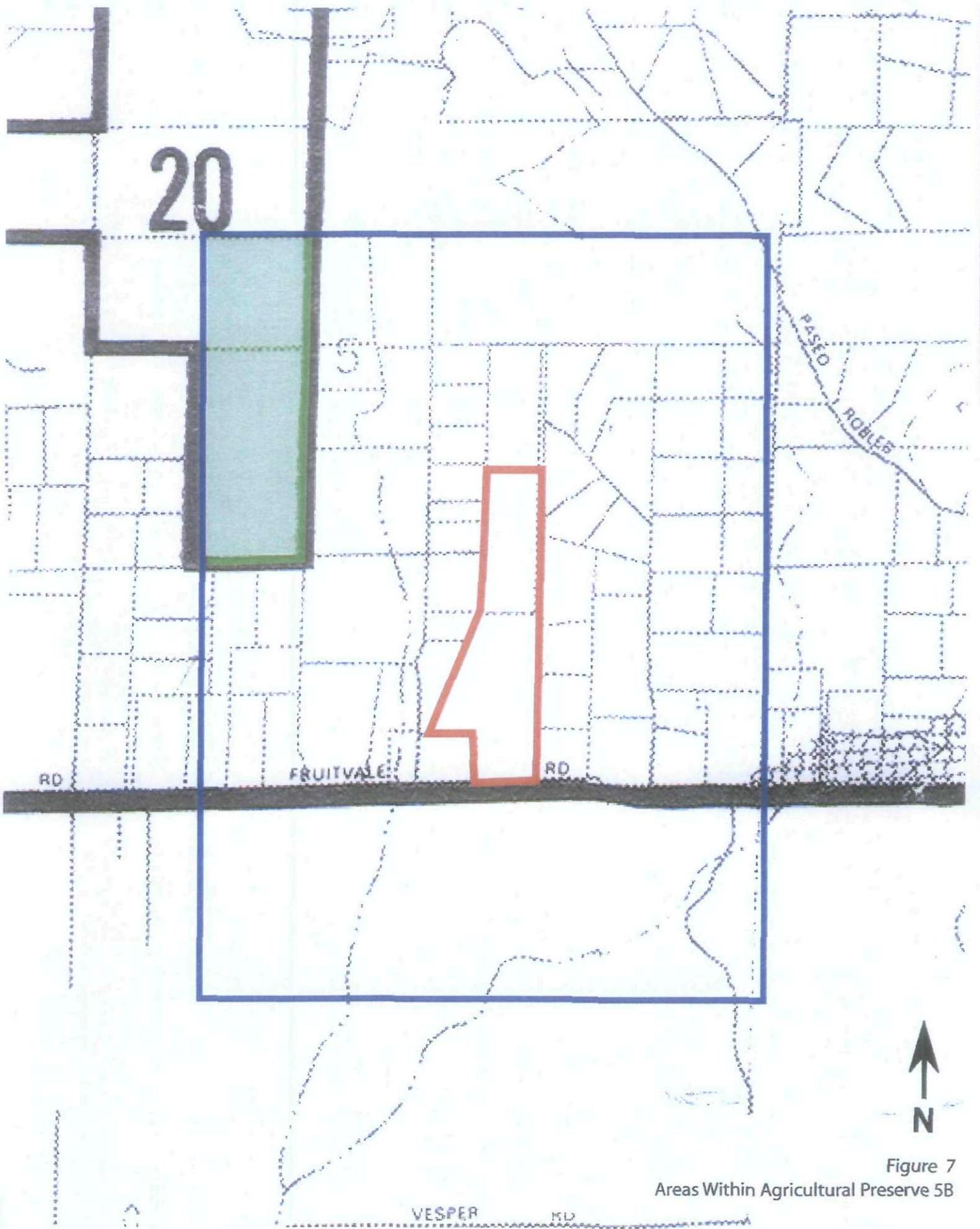


Figure 7
Areas Within Agricultural Preserve 5B

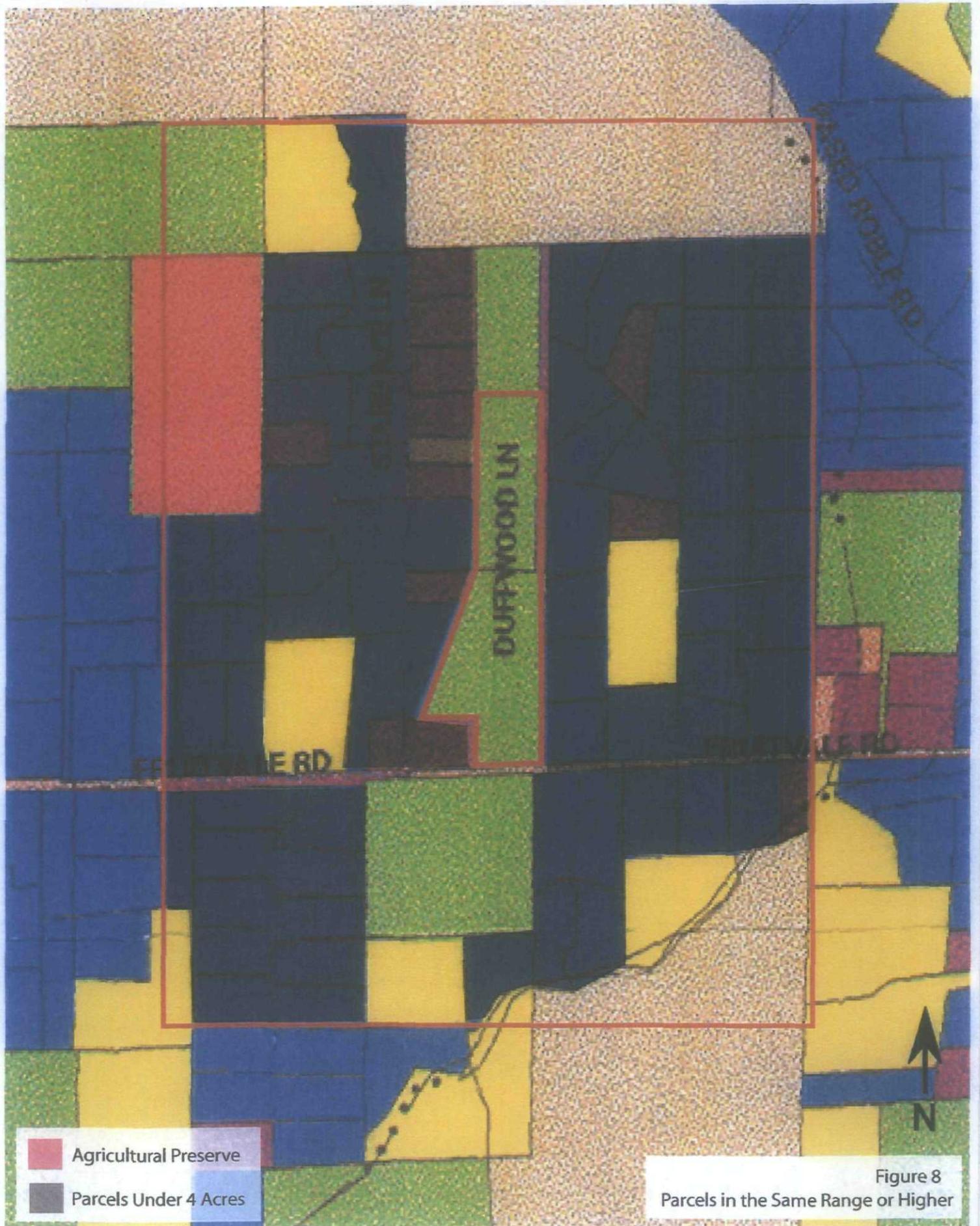


Figure 8
Parcels in the Same Range or Higher

PARCEL SIZE TABLE

Acreage Classification	Number of Parcels	Percentage
Less than 1 Acre	2	1.9%
1-2 Acres	12	11.8%
2-4 Acres	70	69.3%
4-8 Acres	10	9.9%
8-20 Acres	5	4.9%
20+ Acres	2	1.9%
TOTAL	101	100%

Figure 9
Parcel Size Table

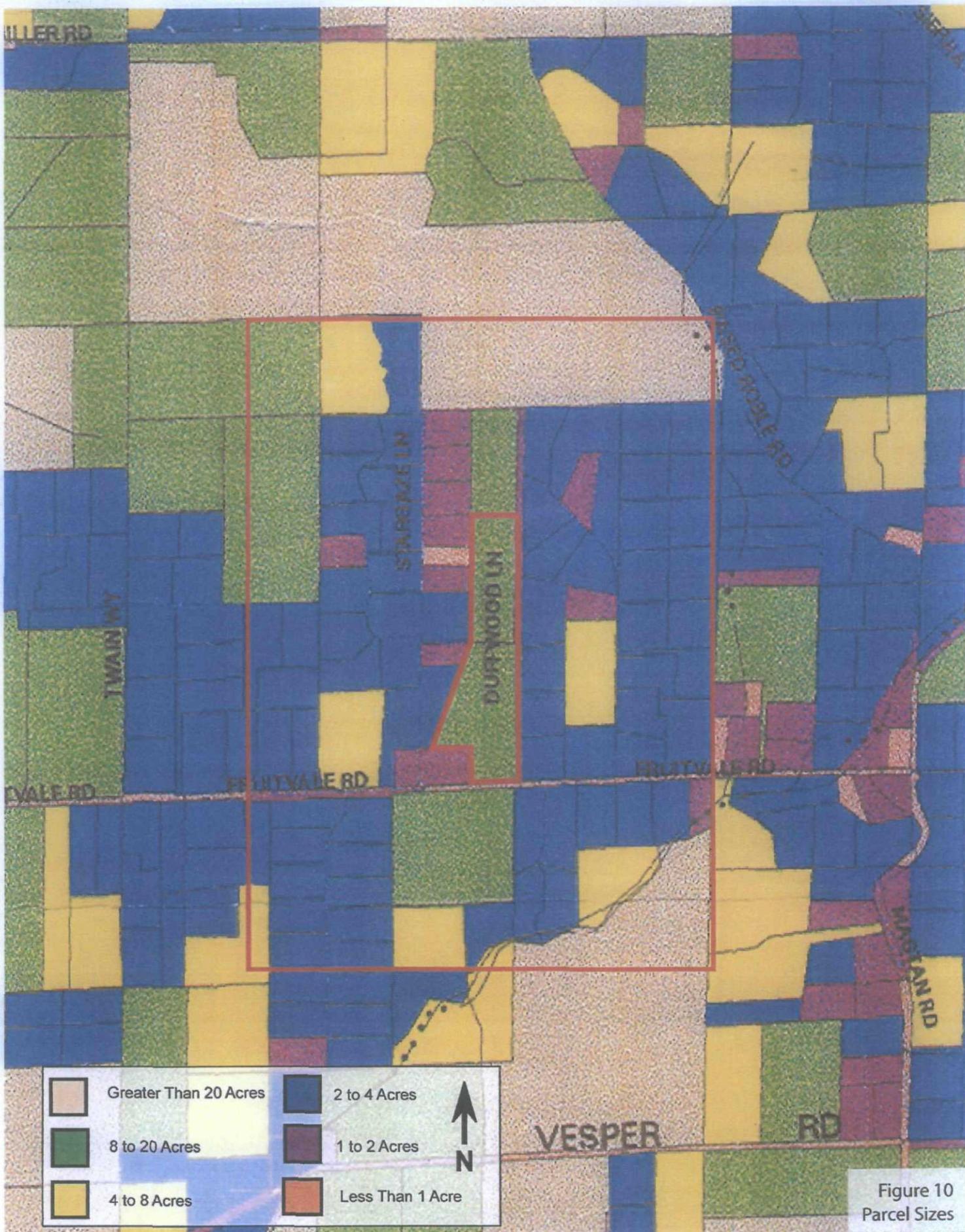


Figure 10
Parcel Sizes

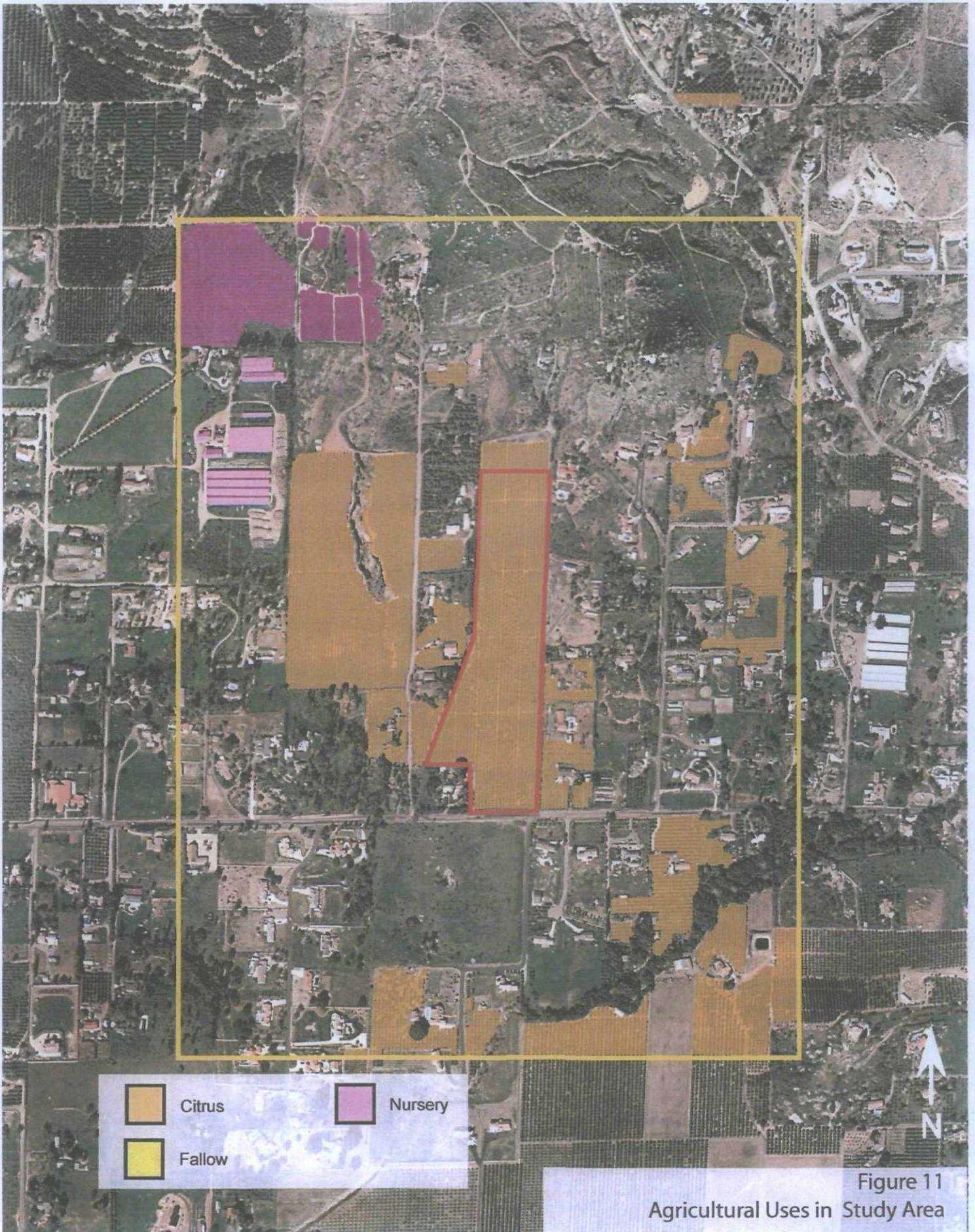


Figure 11
Agricultural Uses in Study Area

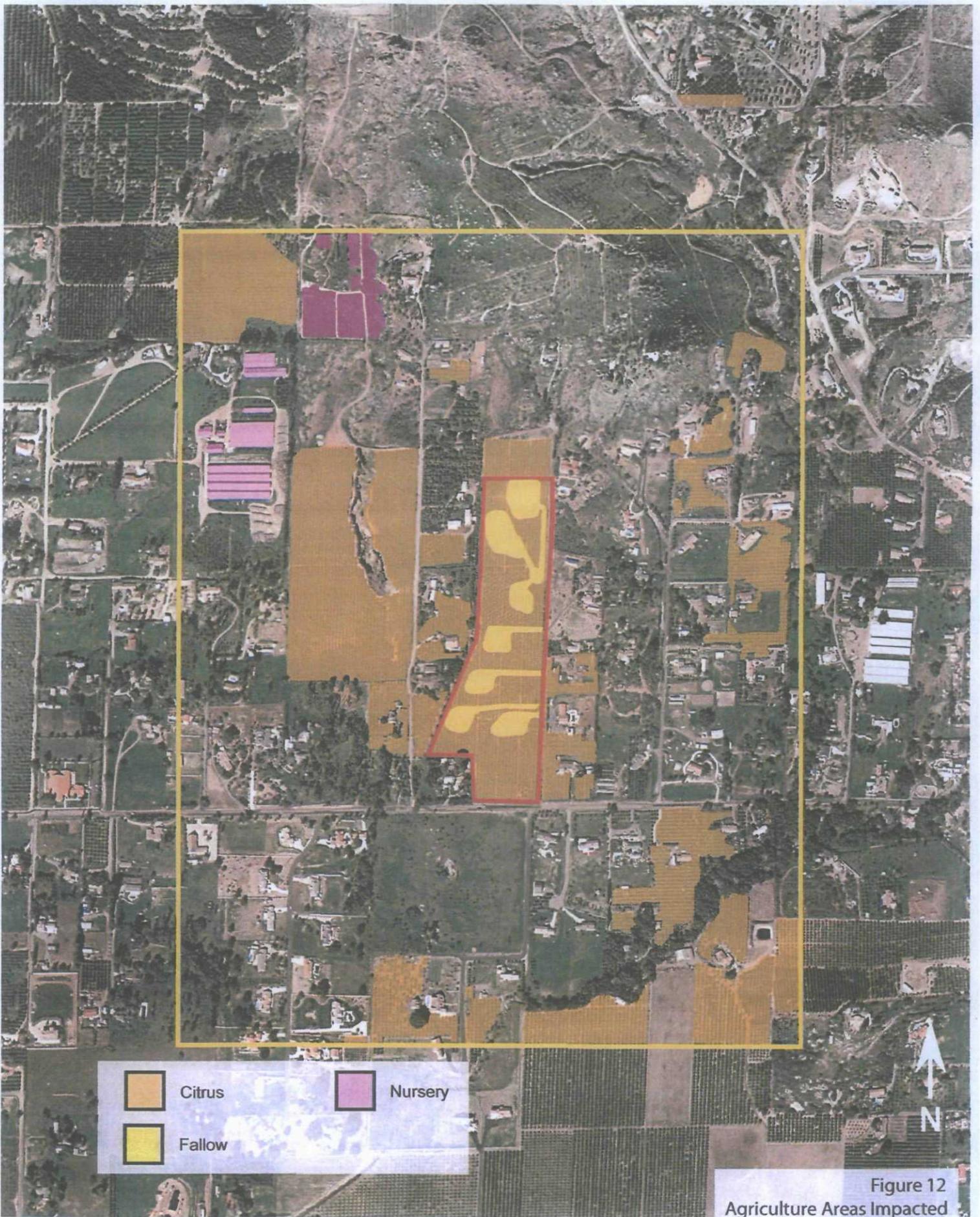


Figure 12
Agriculture Areas Impacted

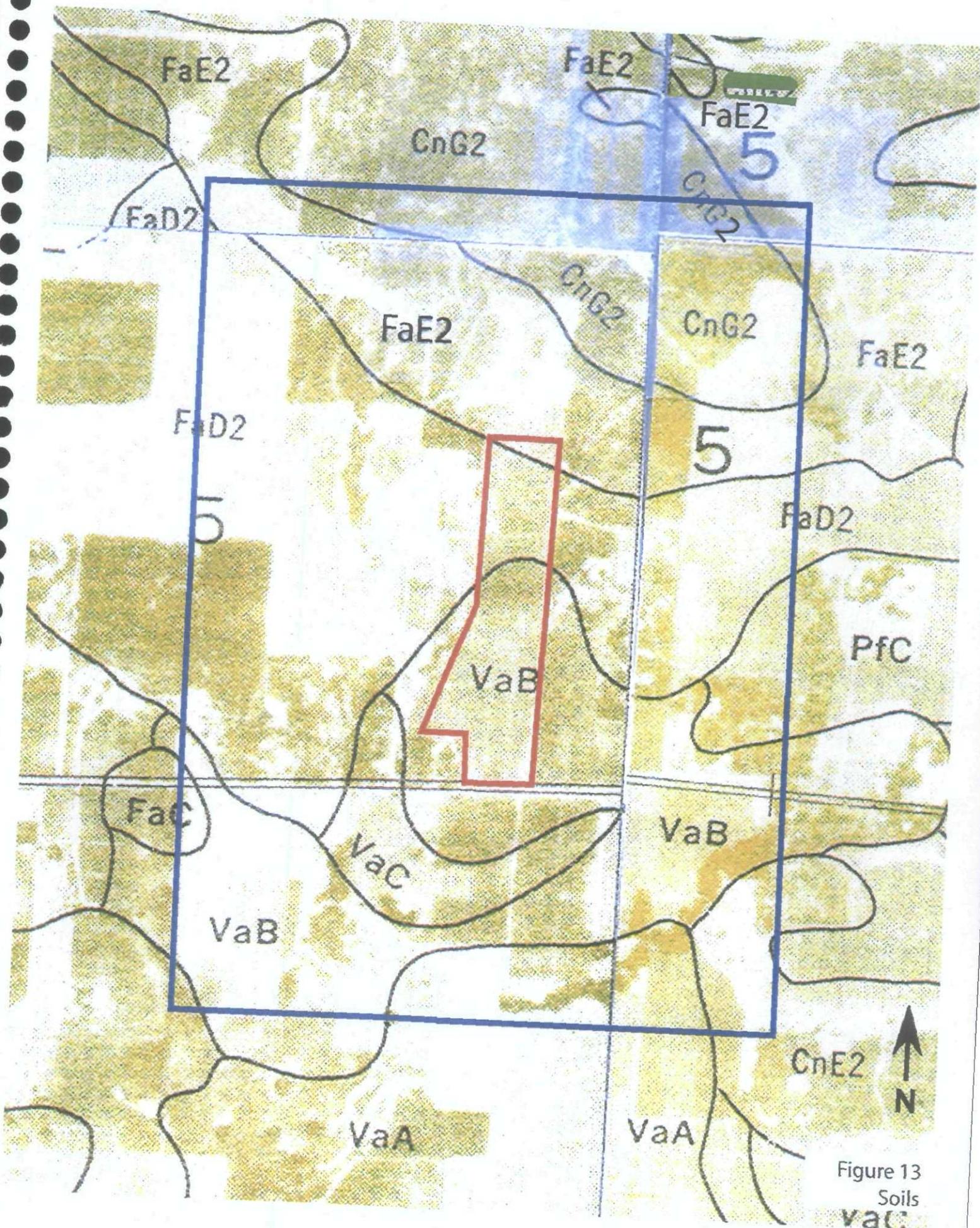


Figure 13
Soils
vaC

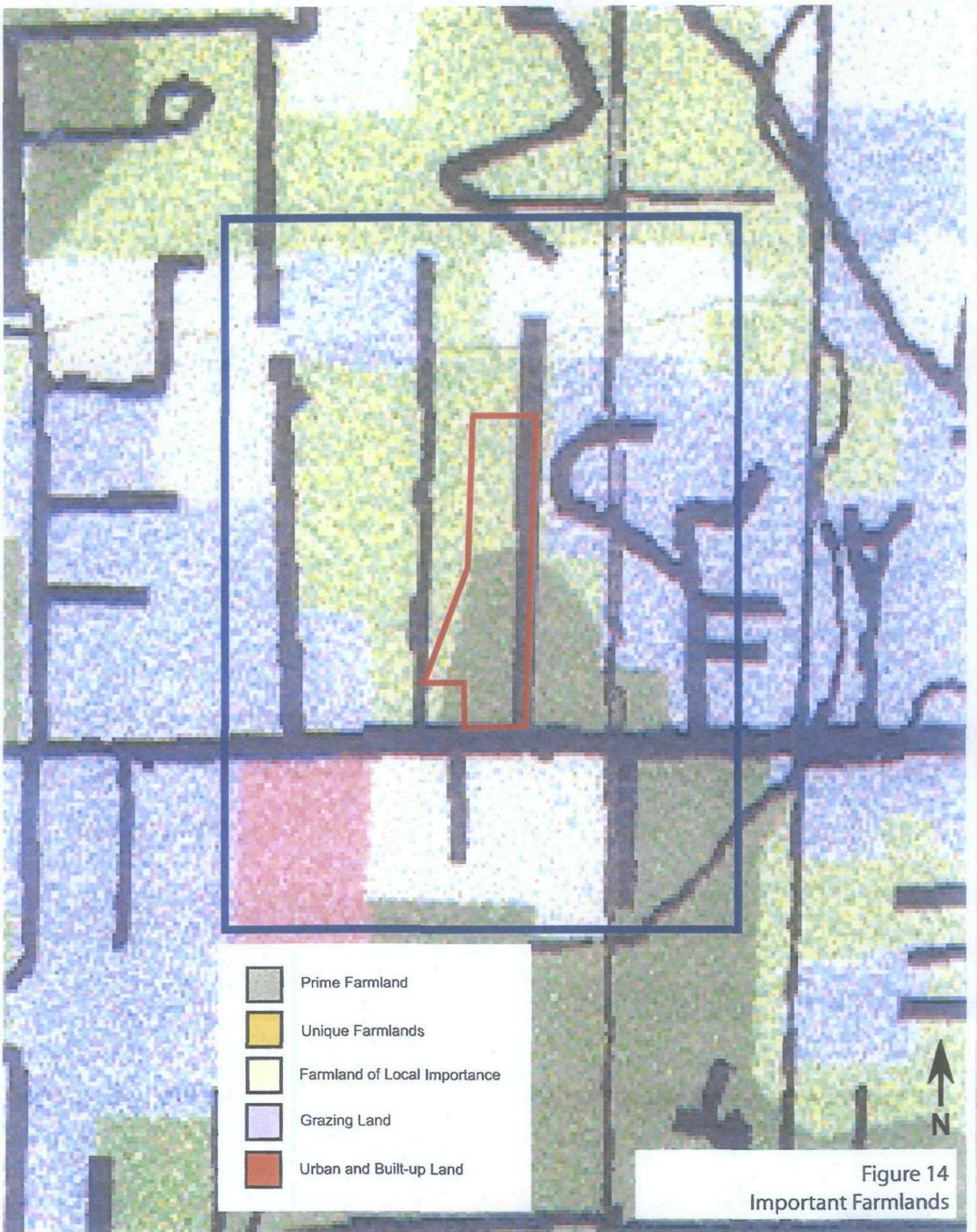


Figure 14
Important Farmlands

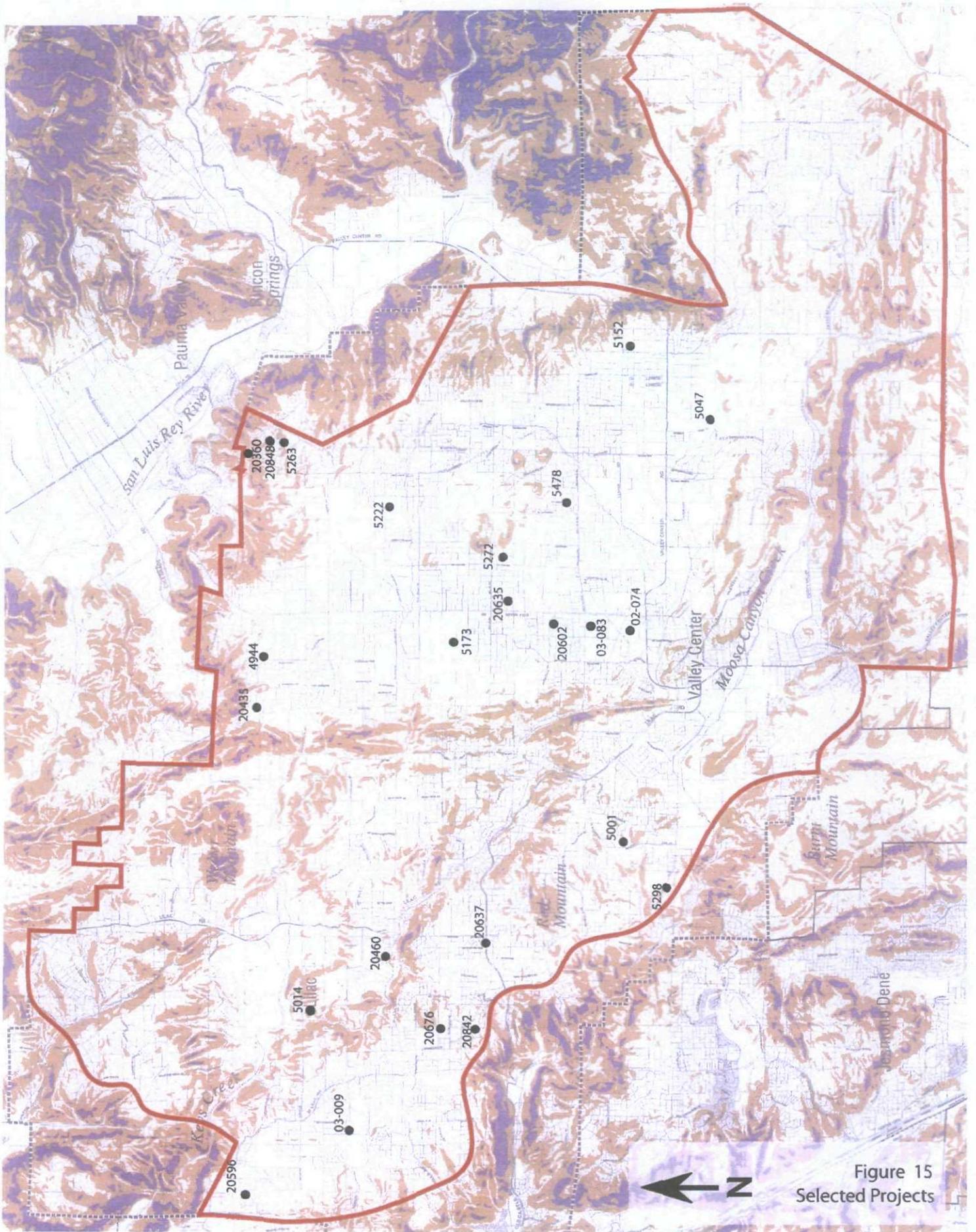


Figure 15
Selected Projects

VI. STATEMENT OF QUALIFICATIONS

The following participated in this study:

James Chagala—Principal Planner

Education: B.A. in Sociology
M.S. in Urban Geography
Ph.D. in Urban Geography

Experience: 31 years as a professional planner
2 years Regional Planner with the East-West Gateway
Coordinating Council
26 years with Department of Planning and Land Use
5 years as Chief of the Long Range Planning Division
10 years as Chief of the Current Planning Division
12 years as staff to the County Planning Commission
5.5 years operating a private planning consultant practice

12 years as Adjunct Professor at San Diego State University
4 years as Adjunct Professor at California State University at San
Marcos

Placed on the San Diego County Environmental Consultant List in the field of
Agriculture on November 14, 2001.

Eric Chagala: Planning Technician
7.0 years as Planning Technician for a private planning
consulting firm.

Appendix A LESA Work Sheets

Table 1A

Land Evaluation Work Sheet

Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
FaE2	0.79	0.045117076	V1e-1	20	0.9023	35	1.5790977
FaD2	4.95	0.282695603	V1e-1	20	5.6539	48	13.569389
VaB	11.77	0.672187322	lie-1	90	60.497	81	54.447173
		0.009				0	0
Totals	17.51			LCC Total	67.053	Storie Index Total	69.59566

Table 1B

Site Assessment Worksheet 1

Project Size Score

LCC Class	LCC Class	LCC
I-II	III	IV-VIII
I	J	K
11.77		0 0.79
		4.95
Total Acres	11.77	5.74
Project Size Score	30	0

Highest Project Size 30

Appendix B

Selected Projects

Applications Filed within the Potential Cumulative Impact Area.	Applications on Agricultural or Disturbed Lands.	Applications on Agricultural or Disturbed Lands and Classified as one of the Principal Farmlands.
20596	20596	20596
20811	20811	20811
5014	5014	5014
20676	20676	20676
20842	20842	20842
20460	20460	20460
5222	5222	5222
20637	20637	20637
20848	20848	20848
5001	5001	5001
5298	5298	5298
5272	5272	5272
20435	20435	20435
5173	5173	5173
20635	20635	20635
20602	20602	20602
5047	5047	5047
5152	5152	5152
5263	5263	5263
20360	20360	20360
03-009	03-009	03-009**
20480	20480	20480
20999	20999	20999
4944	4944	4944
5446	5446	5478
5458	5458	
5451	5451	
20996	20996	
20950	20950	
20912	20912	
20929	20929	
21004	21004	
05-015	05-015	
20825	20825	
21002	21002	
5385	5385	
21001	21001	
20917	20917	
5494	5494	
5039	5039	
5150	5150	
20419	20419	
5403	5403	
20897	20897	
20982	5478	
20419		
20462		
5184		
20689		
5177		
20712		
5039		
20813		
20680		
20274		
20450		
20624		
20661		
20803		
20438		
5212		
20623		
20423		

Appendix C

Cumulative Agricultural Impact--Valley Center
Worksheet

Map	Square Inches	Scale 1"=xfeet	Scale 1=xunits	Area in feet	Area in acres
				0	0
20596	2.68	145.45		56697.28	1.301591
				0	0
5014	29.95	324.27		3149273	72.29737
				0	0
20676	11.52	90.81		94999.17	2.180881
				0	0
20842	29.61	125.15		463767.3	10.64663
				0	0
20460	29.13	90.02		236057.9	5.419143
				0	0
5222	23.26	176.94		728218.6	16.7176
				0	0
20637	61.34	72.66		323843	7.434413
				0	0
20848	27.79	158.58		698852.3	16.04344
				0	0
5001	25.42	231.53		1362668	31.28256
				0	0
5298	18.71	370		2561399	58.80163
				0	0
5272	27.72	180.55		903624.9	20.74437
				0	0
20435	18.08	161.11		469292.3	10.77347
				0	0
5173	22.1	447.79		4431401	101.731
				0	0
20635	18.15	109.09		215996.4	4.958595
				0	0
20602	9.64	184.53		328254.7	7.535692
				0	0
5047	47.1	461.5		10031464	230.2907
				0	0
5152	5.24	115.84		70315.07	1.614212
				0	0
20360	7.94	211.9		356518.8	8.184545
				0	0
20929	33.8	76.56		198116.5	4.548128
				0	0
21002	55.9	53.33		158984.6	3.649784
				0	0
20480	7.72	100		77200	1.772268
				0	0
5451	1.03	367		138729.7	3.184795
				0	0
20825	37	75.79		212532.6	4.879077
				0	0

20996		0	15.945
		0	0
20912		0	6.2
		0	0
21004		0	42.13
		0	0
5446		0	118.02
		0	0
P05-015		0	3.48
5458			18.11
20811	From Cumulative Agricultural Analysis		3.11
5263	From Agricultural Analysis		43
20828	From Agricultural Analysis		8.2
20950	From Agricultural Analysis		2.76
21001	From Agricultural Analysis		1.54
		0	0
20999	From Agricultural Analysis		6.96
5478	From Agricultural Analysis		4.8
Total Acreage Impacted			900.2469

REFERENCES

Written Works:

County of San Diego, Department of Weights and Measures, 2005 Crop Statistics & Annual Report

University of California, Agricultural Extension Service. Climates of San Diego County—Agricultural Relationships, November 1970.

University of California Cooperative Extension. Avocado Sample Establishment and Production Costs and Profitability Analysis for San Diego and Riverside Counties.

United States Department of Agriculture, Soil Conservation Service and Forest Service. Soil Survey San Diego Area, California. December 1973

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance—San Diego County

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. 2002-2004 Land Use Conversion, Table A-26, San Diego County.

www.Avocado.org. Website for the California Avocado Commission.

Maps:

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. San Diego County Important Farmland 2004

County of San Diego, Department of Public Works, Mapping Section. Valley Center Community Plan.

County of San Diego, Department of Public Works, Mapping Section. County of San Diego General Plan—Regional Land Use Element Map,

County of San Diego, Department of Public Works, Mapping Section. County of San Diego—Agricultural Preserves.

SanGis, County of San Diego General Plan 2020 Reference Maps for Valley Center as Follows:

Parcelization
Vegetation

Topography
Valley Center Discretionary Project Status, August 2006