

SUBCHAPTER 3.2

EFFECTS FOUND NOT SIGNIFICANT DURING INITIAL STUDY

3.2 Effects Found Not to be Significant During Initial Study

Two issues were found to have less than significant effects as detailed in the County 15162 Checklist for the Project (refer to Appendix A, Notice of Preparation [NOP] and Comments to the NOP), incorporated by reference into this EIR. Issues with effects found not to be significant are briefly discussed below, with an explanation regarding the assessed lack of significance. In both cases, the Project is evaluated as a whole and no distinction is made between on- and off-site improvements or **Scenarios 1 and 2**.

3.2.1 Agricultural Resources

During preparation of the NOP for this Project (circulated June 11, 2009), the EIRs and related findings for the two prior specific plans on the subject property were reviewed.

The findings adopted for the Sycamore Springs and Campus Park EIRs concluded that agricultural impacts would not be significant.

The findings adopted for the Sycamore Springs EIR concluded that the impact of development would be below a level of significance. The analysis concluded that economic factors outweighed the fact that the Specific Plan area included important farmland and had been used in the past for agriculture. The findings concluded that this portion of the County would not support agriculture in the long-run because of environmental constraints related to winter frosts, soil alkalinity, and adverse economic factors (e.g., high cost of water).

The findings for the 1983 Campus Park EIR, relying in part on prior studies and the findings adopted for the Sycamore Springs EIR, also determined that, due to environmental factors combined with economic factors, which limit continued agricultural production on the site, development of the subject property would not have a significant impact on agriculture.

Additional summary information/clarification relating to soils designations, recent crop types, percentage of business loss compared to County-wide agricultural resources, overall County agricultural preservation efforts and policies, as well as potential impacts on adjacent agricultural areas resulting from project implementation was added to the Final EIR in the form of responses to comments. The responses were based on information provided by Tom Escher, County Department of Agriculture. Mr. Escher noted:

[d]espite the presence of prime soils, the proposed project will not impact the preservation of agricultural land in San Diego County. Because the site is virtually surrounded by proposed urban development, and is adjacent to I-15, this land is no longer regarded as prime agricultural land by the County's Department of Agriculture.

It was also noted that other projects surrounding the site had committed additional acreages to urban development. In addition, it was noted that the steeply sloped mountains to the east were regarded as a natural buffer protecting agricultural activities east of the mountains from encroaching development from the west. For those reasons, project implementation on what was

referred to as “rich, alluvial soils” was not considered a significant impact by the County of San Diego Department of Agriculture and Board of Supervisors. This finding is relied upon for the proposed Campus Park West Project.

Within the County overall, although percentages of specific crops have varied, agricultural use continues to provide a vibrant economic resource. In 1986, farming acreage (nursery crops, flower crops, fruit and nut crops, vegetable crops and field crops) totaled 172,948 acres (San Diego County Department of Agriculture, Weights and Measures [County Department of Agriculture] 1997). In 2010, these same crops totaled 307,291 acres (County Department of Agriculture 2010).

Specifically with regard to the Project locale, conditions critical to the above decision by the County Department of Agriculture and the Board of Supervisors related to agriculture in this area have not substantially changed.

- The Project is still immediately adjacent to I-15.
- Campus Park West is still surrounded by land committed to development. In fact, three projects in the immediate vicinity (Palomar College North, Campus Park and Meadowood) have all been approved by their respective CEQA lead agencies, and construction of some critical project elements is underway.
- The cost of water continues to be a serious consideration in the County and can be one of the determinants in decisions about type and extent of irrigated agricultural use.

Within the valley, the only active agriculture impacted by the Project would be removal of approximately 3 acres (2.9 acres) of a 12.5-acre citrus orchard remnant south of SR-76/Pala Road. This grove was previously impacted by the realignment of SR-76 by Caltrans. Based on review of historical aerial photographs available on www.historicaerials.com, the area for that grove appears to have been cleared as early as 1953 and was in place at least by 1964. That grove was present when the BOS made its decision (based in part on information from the County Department of Agriculture) regarding value of valley agriculture in 1981 and 1983.

As stated above, however, it was also noted that the steeply sloped mountains to the east provided a natural buffer protecting agricultural activities east of the mountains from encroaching development from the west. To that end, photographs on the same site from 1981 through 2005 were reviewed for Rice Canyon, the agricultural valley immediately east of the ridgeline. These were supplemented by review of the ESRI aerial for 2010. Rice Canyon was clearly agricultural in nature in 1981. Since then, some additional residential building has occurred, but agricultural uses have been retained. Comparison of the aerials indicates that agricultural activity continues on each of the parcels where it showed in 1981. Some isolated grove areas (e.g., just southwest of the agricultural pond in the southern portion of the canyon, and a large east-west oriented grove toward the northern portion of the canyon) have been slightly expanded, or have matured.

Overall, therefore, conditions are considered to be in-line with conditions anticipated during the 1981 and 1983 conclusions. Consistent with the two previous EIRs, development of the Campus Park West proposed project would not result in a significant impact on agriculture. The

environmental constraints related to climate and soil alkalinity remain present and the economic factors are even less favorable in the existing condition due to the continued development in the area and increases in water costs. Thus, no further analysis need be conducted with respect to agriculture relative to County standards because the proposed Campus Park West Project would not result in any additional impacts to agricultural resources not already considered in the previous EIRs.

In addition to review of this issue relative to County identification of significance, the Local Agency Formation Commission, or LAFCO, also requires review during its consideration of sphere of influence (SOI) amendment and changes of organization (please refer to the Permits matrix in Chapter 1 for annexations and detachments related to this Project).

A number of state laws address LAFCO's role with respect to prime agriculture and open space. The Cortese-Knox-Hertzberg Act of 2000 mandates that LAFCOs are required to consider how spheres of influence or changes of organization could affect open space and prime agricultural land. Commissions are directed to:

- Guide development away from prime agricultural lands unless that action would not promote the planned, orderly, efficient development of an area; and
- Encourage development of existing vacant or non-prime agricultural lands within a jurisdiction before approving any proposal that would allow development of open-space lands outside of an agency's boundary (Govt. Code Section 56377).

Proposals are to be reviewed for their effect on maintaining the physical and economic integrity of agricultural lands (Govt. Code Section 56668).

The San Diego LAFCO has adopted Legislative Policy L-101 (Preservation of Open Space and Agricultural Lands) to implement state objectives. Government Code Section 56064 (found in the Cortese-Knox-Hertzberg Act of 2000 governing LAFCO), defines "Prime agricultural land" as an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of five qualifications (noted in italics below). Following each qualification is an analysis to determine if the reorganization area meets the identified criteria.

(a) Land that qualifies, if irrigated, for rating as Class I or Class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible

The USDA Natural Resources Conservation Service maps show that the Proposed Project contains eight soil types, with the reorganization area including six soil types, as illustrated on: Figure 3.2-1, Water District Boundaries; Figure 3.2-2, Soils; and Table 3.2-1, Campus Park West Soil Classifications.

None of the soils are rated Class I. Approximately 67.8 acres of the reorganization area would be considered Class II (Grangeville fine sandy loam 0 to 2 percent slopes [8.2 acres], Ramona sandy loam 2 to 5 percent slopes [43.6 acres], and Visalia sandy loam [16.0 acres])

soils. The remaining soils range from Class III to Class VIII. Although irrigation is not currently present, hookups could be feasible.

(b) Land that qualifies for rating 80 through 100 Storie Index Rating

As shown in Table 3.2-1, Grangeville and Visalia sandy loam soils, which comprise approximately 24.2 acres of the reorganization area, have Storie Index Ratings between 80 and 100; with both ratings being 81, at the low end of the scale. The balance of the property has substantially lower ratings (from less than 10 to 65), with the majority of the reorganization site (43.6 acres) being rated 65.

(c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the 11 United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003

The reorganization area does not currently support livestock for the production of food or fiber

(d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre

(e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years

No part of the reorganization area is planted with fruit or nut-bearing trees, vines, bushes, or crops that have generated any value at all for the past several decades. As shown on Figure 2.6-1 of this EIR, vegetation types on site within the reorganization area include native habitats, non-native grassland, eucalyptus woodland, disturbed habitat, and ornamentals.

The reorganization area would be considered to be prime agriculture by LAFCO as two of the five applicable qualifications listed in Government Code Section 56064 have been met.

Legislative Policy L-101 (Preservation of Open Space and Agricultural Lands) states the policy of the Commission is to:

- (1) Discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area or the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use;

- (2) Require rezoning of territory (city only) to identify areas subject to agricultural preservation and planned development;
- (3) Follow San Diego LAFCO's adopted procedures to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.

In accordance with the State Government Code 56377 and the San Diego LAFCO Policy L-101 (described above), the County is found to have adopted measures to effectively identify and preserve prime agricultural lands within its sphere of influence for agricultural use, but that preservation of the Project site for agricultural purposes would be inconsistent with the objectives of state law and adopted local policies because:

- (1) Agriculture is the fifth largest component of the County's economy (County General Plan 2011). The County ranks agricultural retention high in priority as an element of overall County health. As of the 2011 General Plan Update, the County was noted as having the fourth highest number of farms of any county in the country, and the third highest number of farms in California. As a result, the County has a substantial program required for agricultural issues review. Standard procedure is for new projects to complete a full review in accordance with the County Guidelines for Determining Significance and Report Format and Content Requirements. These guidelines require review of soil capability classifications, Storie indices, water availability, etc. The County has expanded the definition of an agricultural resource over State definitions to capture smaller farms (State standards use a minimum 10-acre mapping unit). County recognition of the variety of soils that may contribute to valuable agricultural production, as well as the understanding that even small parcels may contain valuable agricultural potential, contributes to an accurate perception of the value of farmlands in the County, and results in a conservative approach (i.e., likely to show impact with required mitigation) to agricultural lands review. As a result, it can be seen that the County has adopted measures that would effectively identify and preserve prime agricultural lands for agricultural use.

For this particular Project location, however, the reorganization area has been identified by the County for non-agricultural use since 1981, a period of over 30 years. As noted by Mr. Tom Escher of the County Department of Agriculture in 1983, for reasons described above in this section, despite the presence of prime soils, non-agricultural development of the Project parcels would not impact the preservation of agricultural land in San Diego County. The long-term expectation of developed non-agricultural uses in this area is also reflected in the current County of San Diego's General Plan (2011) which anticipates development of the Project with commercial, limited impact industrial and residential uses in this area (Figure LU-A-8, the Fallbrook Land Use Map) as part of the overall smart growth designs for the County. The prior General Plan showed that the area would be developed with intensive uses related to a previously anticipated Hewlett Packard Industrial Park and associated uses. The current Project, with associated development of the reorganization parcels, is a cornerstone project for development in the I-15 and SR-76 quadrant, and would provide commercial and employment opportunities in this area that are part of a three-project development vision (and for which the other two projects,

Campus Park and Meadowood), have already received approval. Inability of the County to develop the inactive prime agricultural areas identified within the reorganization area would not only “not promote” the planned, orderly, efficient development of this quadrant, but would actively impede it.

- (2) County planning and zoning both characterize the mixed commercial and residential uses in the reorganization area as a more desirable long-term objective for the Project site than agriculture. According to County Board of Supervisor directive, loss of agricultural resources and use of prime soils in this area do not constitute a significant agricultural impact in this area. Ongoing and increased agricultural activities in the nearby Rice Canyon area, however, continue to play a vital part in County agriculture and are protected from the ongoing and planned increase in non-agricultural development by the separating ridgeline. Adopted County planning and zoning designations both envision mixed use of this property rather than preserving the land exclusively for agricultural use. As described in Section 3.1.5 of this EIR, the County regional land use category for the reorganization area is identified as “Village.” The Fallbrook Community Plan designates Campus Park West property as General Commercial, Limited Impact Industrial, Village Residential (VR-7.3), and Specific Plan Area (2.8). (The Specific Plan Area designation is used where a specific plan has been adopted [in this case, the 1983-approved Hewlett Packard Campus Park Specific Plan, SP-83-01]). As early as June 1, 1988, the San Diego County Board of Supervisors approved the Interstate 15/Highway 76 Interchange Master Specific Planning Area (MSPA). This area encompassed approximately 1,178 acres of land located within four quadrants of the interchange. The Project site is located within the MSPA and is identified as Hewlett Packard “Campus Park” (Areas A, C and D of Specific Plan 83-01). Because of its location at the intersection of an interstate highway and a major state highway, the MSPA envisions this area as a logical node for future development. The MSPA states that:

The principal land use components of the proposed plan include the adopted Campus Park/Hewlett Packard industrial/research park Specific Plan to convert approximately 100 acres of mobile home park [the anticipated land use prior to 1988] to an industrial/research park use...or to retain it for residential uses. Also proposed are residential areas to meet some of the anticipated housing needs of the community and the industrial park, supporting neighborhood commercial areas....

The Zoning Ordinance identifies the Project site as S90 – Holding Area. This is an interim zone intended to prevent premature development from occurring in areas that are lacking adequate public services and facilities or where the determination of appropriate zoning regulations is precluded by planning proposals or by a lack of geographic, demographic, economic, or other information. In this instance, the zone addresses the lack of existing water and sewer lines to the site, both of which are being addressed as part of the current Project.

- (3) The County’s General Plan provides guidance for the protection, promotion and preservation of agriculture in the County. Aspects of agriculture are discussed in the

General Plan's Conservation and Open Space Element, Land Use Element, and community plans. The General Plan elements identify policies and action programs to analyze, improve and promote agriculture, and to monitor agricultural conversion, where necessary. Specific to LAFCO interests, policies are specifically focused on support of agricultural economic competitiveness and protection of agricultural operations from encroachment by incompatible land uses. The community plans address protection, promotion and preservation of agriculture on a community-by-community basis. The County has also developed ordinances and programs that provide for implementation of County policies. These include: the San Diego County Agricultural Enterprises and Consumer Information Ordinance; the Board of Supervisors Policy I-33 Support and Encouragement of Farming in San Diego County and Policy I-38 Agricultural Preserves, and the San Diego County Farming Program.

The San Diego County Agricultural Enterprises and Consumer Information Ordinance is similar to the California Right to Farm Act. The ordinance defines and limits the circumstances under which agricultural enterprise activities, operations, and facilities will constitute a nuisance. The ordinance recognizes that the commercial agricultural industry in the County of San Diego is a significant element of the County's economy and a valuable open space/greenbelt resource for San Diego County residents. The ordinance establishes a procedure whereby prospective purchasers of property are notified of the inherent potential conditions associated with agricultural operations found throughout the unincorporated area. Board of Supervisor Policy I-38 sets forth policies for the implementation of the California Land Conservation Act of 1965, known as the Williamson Act. Policy I-38 establishes criteria for the establishment, modification and disestablishment of an agricultural preserve including processing requirements, application fees, and hearing requirements. The Support and Encouragement of Farming in San Diego County Policy <http://www.sdcountry.ca.gov/cob/policy/I-133.pdf> was adopted in 2005. The policy established the Board's commitment, support, and encouragement of farming in San Diego County through establishment of partnerships with landowners and other stakeholders to identify, secure, and implement incentives that support the continuation of farming as a major industry in San Diego. The intent is to develop and implement programs designed to support and encourage farming in San Diego County. The goals of the San Diego County Farming Program are to promote economically viable farming in San Diego County and to create land use policies and programs that recognize the value of working farms to regional conservation efforts. Development of a framework for the Farming Program established a partnership between the County of San Diego, the San Diego County Farm Bureau, UC Cooperative Extension/Farm and Home Advisors, and the American Farmland Trust.

- (4) Excluding open space areas associated with the San Luis Rey River, the Monserate Mountain Preserve, and the Engel Family Preserve; the I-15 and SR-76 quadrant area has largely transitioned over a number of years from agriculture to other developed uses. The limited agricultural cultivation on portions of the Project site outside of the reorganization area represents a remnant of the neighborhood's transition.

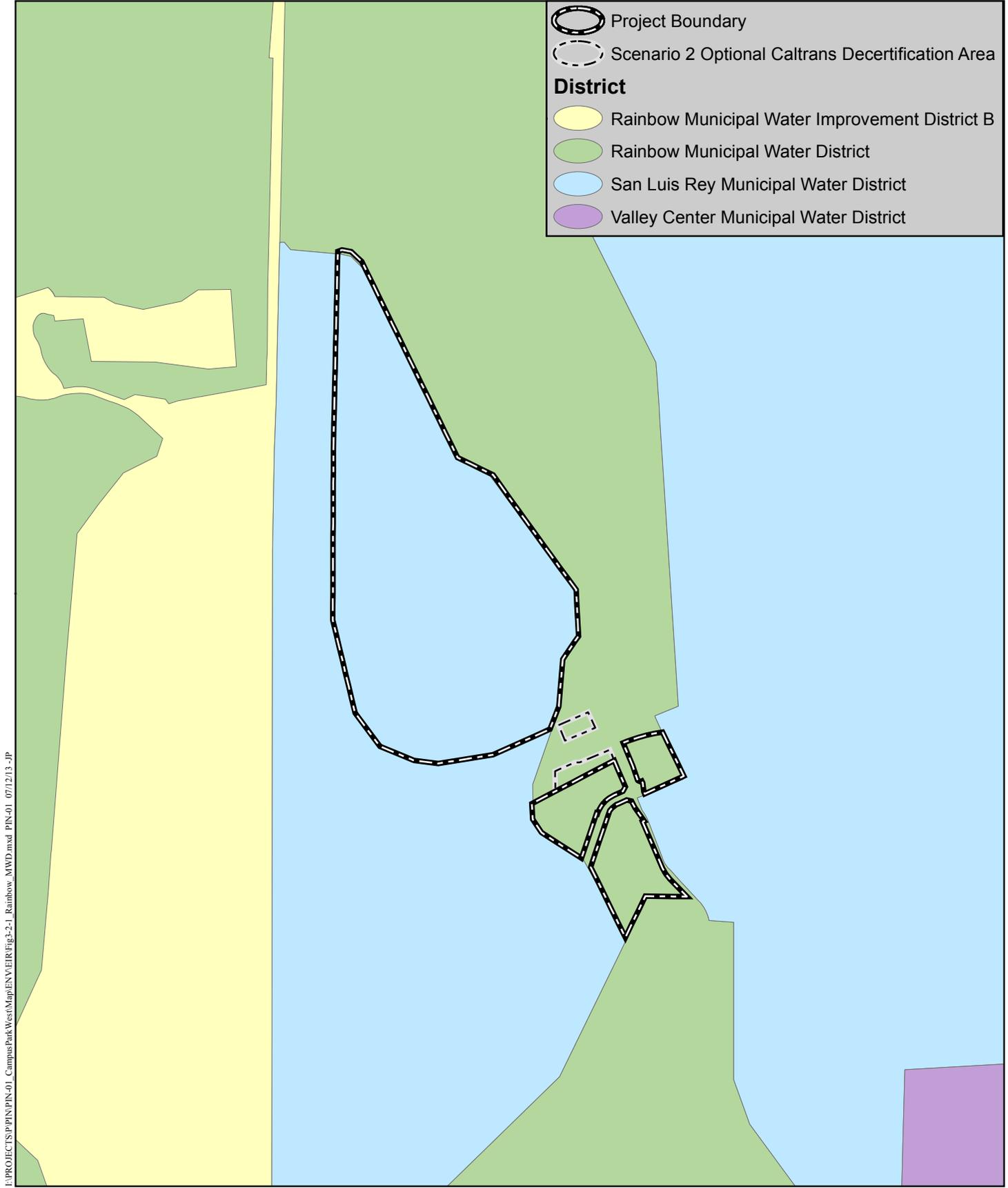
- (5) The Project is not proposing infrastructure extensions or other improvements which would impact existing off-site agricultural operations. In addition, in the one area where the Project would abut existing agriculture (a grove located south of SR-76), Project design requires a wall between the existing agricultural and proposed commercial uses. As a result, implementation of the proposed development would not result in significant project-level or cumulative impacts to adjacent agricultural resources.
- (6) LAFCO policies support preservation of open space as well as prime agriculture. The development associated with the proposed reorganization area proposes to devote approximately 31 acres (approximately 27 percent of the site) to permanent open space, with appropriate buffers and fencing to preserve sensitive biological resources.
- (7) In 2011, the County included over 300,000 acres in agricultural production. The long-term feasibility of this site for commercial farming is limited and would not be considered particularly valuable or offer a significant opportunity in the larger context of the region's agricultural resources. Although class I or II soils exist on part of the reorganization area, 90 percent of agriculture in San Diego County is conducted on soils which are not classified by LAFCO law as prime.

In conclusion, implementation of the Proposed Project would convert land considered to be Prime Farmland by LAFCO to non-agricultural use. For the reasons discussed above, however, the Proposed Project would not significantly impact agricultural resources as conversion to other uses would conform to San Diego LAFCO Policy L-101 and the Cortese-Knox-Hertzberg Act of 2000.

Table 3.2-1 CAMPUS PARK WEST SOIL CLASSIFICATIONS			
Soil Map Unit Name	Class	Storie Index	Project Ac/ Reorg Ac
Grangeville fine sandy loam, 0 to 2 percent slopes	II	81	22.4/ 8.2 ¹
Ramona sandy loam, 2 to 5 percent slopes	II	65	43.6/ 43.6
Ramona sandy loam, 5 to 9 percent slopes	III	58	3.1/ 3.1
Ramona sandy loam, 5 to 9 percent slopes, eroded	III	51	9.0/ 9.0
Ramona sandy loam, 9 to 15 percent slopes, eroded	IV	48	18.1/ 18.1
Riverwash	VIII	-10	0.001/ 0.0
Tujunga sand, 0 to 5 percent slopes	IV	39	1.2/ 0.0
Visalia sandy loam, 2 to 5 percent slopes	II	81	19.1/ 16.0
Total			116.5/ 98.0

¹ Approximately 2.1 acres of the Grangeville fine sandy loam, 0 to 2 percent slope acreages, are associated with the Caltrans decertification areas, both of which are outside the reorganization area).

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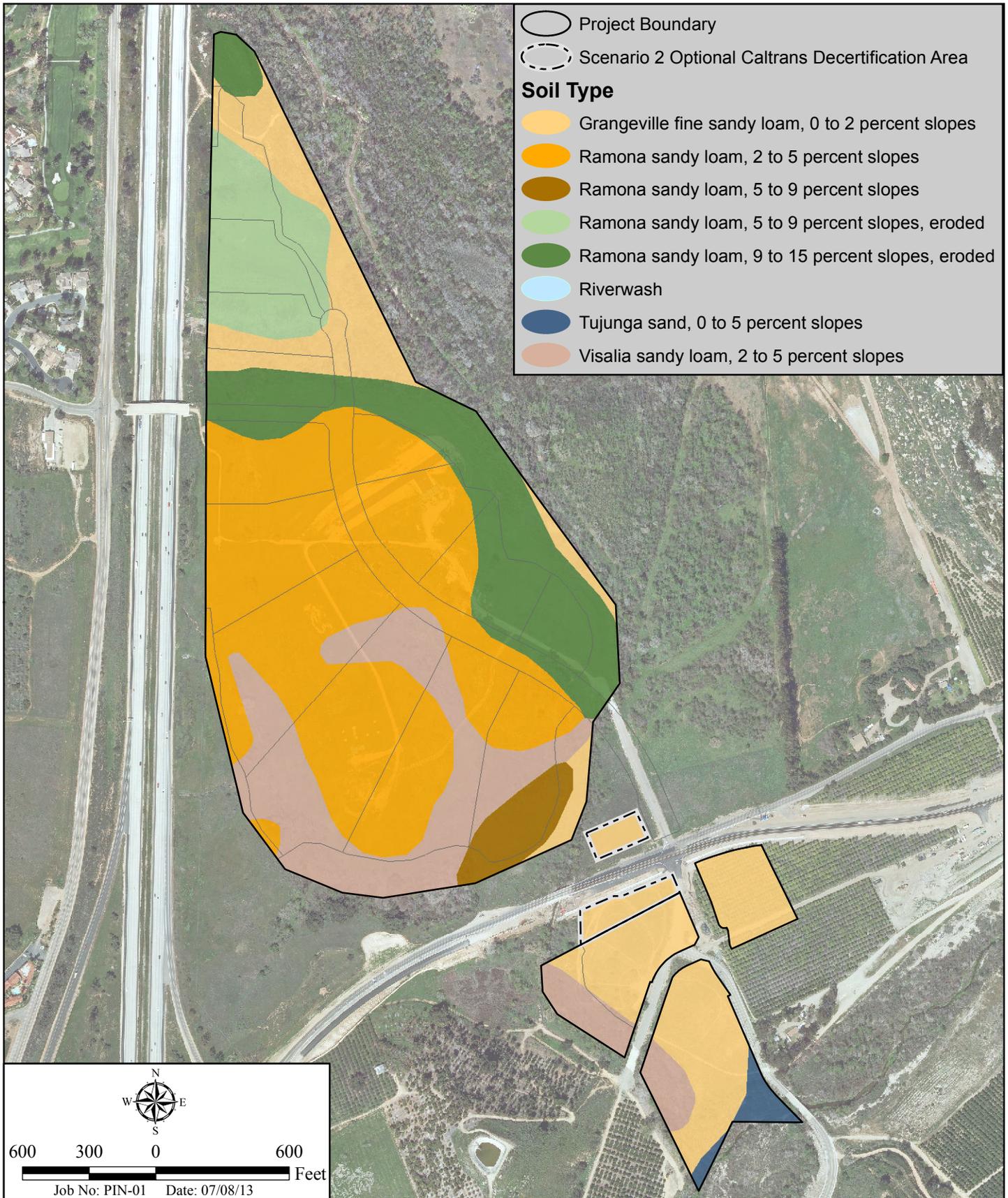


 Project Boundary
 Scenario 2 Optional Caltrans Decertification Area
District
 Rainbow Municipal Water Improvement District B
 Rainbow Municipal Water District
 San Luis Rey Municipal Water District
 Valley Center Municipal Water District

Water District Boundaries

CAMPUS PARK WEST

Figure 3.2-1



Soils

CAMPUS PARK WEST

Figure 3.2-2