

2.4 Agricultural Resources

This subchapter describes existing agricultural resources within the project site and vicinity; evaluates associated potential impacts from implementation of the project and applicable cumulative projects; and identifies related design considerations and mitigation measures. The analysis is based on the Agricultural Resources Technical Report prepared for the project (RECON 2013b) and Local Agricultural Resources Assessment (LARA) Model Results which are included therein. The technical report is included as Appendix F to this EIR.

2.4.1 Existing Conditions

2.4.1.1 *Regulatory Framework*

Federal

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

State

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

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

California Land Conservation Act (Williamson Act)

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

California Department of Conservation's Farmland Mapping and Monitoring Program

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

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

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

California Department of Pesticide Regulation

The California Department of Pesticide Regulation regulates pesticide sales and use and fosters reduced risk pest management with the goal of protecting human health. Applicable regulations pertaining to the application of pesticides (in particular, methyl bromide) are found in Sections 6447, 6447.1, 6447.2, and 6447.3 of the California Code of Regulations. These regulations establish buffer zone requirements, work hour restrictions, notification requirements and other restrictions to address local conditions. Permits for field fumigation are locally issued, by the County Department of Agriculture, Weights and Measures (AWM).

County of San Diego Local Agricultural Resource Assessment Model (LARA)

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

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

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

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

County Board of Supervisors Policy I-38

The County Board of Supervisors is committed to supporting and encouraging 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 the County. Specific elements of this policy include criteria for preserve establishment (e.g., eligibility and size), terms (i.e., contract duration), renewal/non-renewal and cancellation, as well as provisions for implementing eminent domain and fee/tax schedules.

County of San Diego Board of Supervisors Policy I-133

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

County of San Diego Farming Program

The County has completed a contract with American Farmland Trust to help develop the Farming Program. The Farming Program is intended to create the framework for an economically and environmentally sustainable farming industry for San Diego County. The program, when adopted, will include land use policies and programs to keep land available and affordable for farming on a voluntary basis. It will also include economic development tools to help improve farm profitability.

2.4.1.2 Existing Agricultural Resources

On-site Agricultural Uses

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

Soils

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

The CDC publishes a list of soils that meet the soil quality criteria for Prime Farmland soils and soils of Statewide Importance. The soil criteria are defined by the NRCS and are unique to each county. These soil criteria include a much broader range of soils than the Prime Agricultural Land definition in Government Code section 51201(c). Within Table 2.4-1, an asterisk (*) next to the soil type indicates a Prime Farmland soil, and a carrot (^) next to the soil type indicates a soil of Statewide Importance. As shown in the table, 63.4 acres of soils within the project site meet the definition of Prime Farmland soils or Soils of Statewide Importance; however, only 40.2 acres are available for agricultural use, as defined by the County Guidelines. As defined by the County Guidelines, the remaining 23.2 acres are considered unavailable because they have been disturbed or are compacted by roads or structures or contain a sensitive biological habitat type.

FMMP Important Farmland Designations

Figure 2.4-3 illustrates the farmland designations within the project site including lands designated as Farmland of Statewide and Local Importance, Unique Farmland, and Other Land (CDC 2008). There are no Prime Farmlands or Grazing Land on the project site.

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

**TABLE 2.4-2
ACRES OF FMMP FARMLAND ON-SITE AND
AS A PERCENT OF THE ENTIRE PROJECT SITE**

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

History of Agricultural Use

Development within the project area began prior to 1901, as there are five structures on or within the vicinity of the project site according to 1901 USGS surveys reviewed by Affinis during preparation of the cultural resources report (Affinis 2013). There are eight houses remaining on-site that are estimated to be over 45 years old; however, most of these houses do not appear on the 1946 or 1953 aerial photographs. In the 1963 aerial photograph there is evidence of some orchards in the northeastern and southern portions of the site, but the beginnings of the present pattern of agricultural production is not evident until the 1975 aerial photograph. Agricultural use appears to continue expanding through the 1970s and 1980s with the northern portions being heavily used for orchard crops (primarily citrus and avocado), while the southern portion is primarily used for row crops.

Pesticide Use

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

State pesticide regulations prohibit discharging pesticides directly onto a neighboring property without the consent of the owner or operator of the property, and there are also regulations and label requirements that prevent or minimize “drift” during aerial applications. Drift is the airborne transportation of residual pesticides, during or after pesticide application, via aerial or ground spraying, onto adjoining properties or onto roadways, trails or other routes travelled, by the general public. Drift is a primary concern for neighboring property owners and the public, due to the possibility that pesticide drift may contribute to health concerns.

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

The AWM in the County of San Diego inventories pesticide use permits per parcel number. The agricultural chemical products applications on the project site or within 1.5 miles of the project site within the last five years are mapped on Figure 2.4-4 and include the products listed in Appendix F (County of San Diego 2012b).

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

Climate

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

The project site is located within Sunset Zone 23 (within the Transitional zone), which is one of the most favorable for growing subtropical plants and most favorable for growing avocados (County of San Diego 2010a). Climate conditions for the project site are

typical of a Mediterranean climate regime, with a wet winter rainy season followed by a hot, dry summer. Spring and fall months tend to be mild in temperature and variable in rainfall amounts. The average January low temperature for the area is approximately 40°F, and the average July high temperature is between 85°F and 90°F. Average annual rainfall is 15 inches.

Water Resources

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

Williamson Act Contracts Lands/Agricultural Preserves

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

Surrounding Land Uses

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

Surrounding Agricultural Uses

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

- **Mixed-use Orchards** - There are approximately 1,347 acres within the one-mile zone around the project site that fall into this category. This category consists of

citrus and avocado orchards, with the citrus orchards being most prevalent within the flatter portions of the site with well-developed soils and avocados being present within the steeper areas. Orchards within the one-mile zone consist primarily of commercial scale operations located to the north and south of the project site. Most of the smaller scale orchards (approximately 2–4 acres) are considered part of the “estate residential” category, as discussed below.

- **Row crops** are those areas used to grow labor intensive crops such as tomatoes, beans, strawberries, herbs, and peppers. The majority of row cropping operations that exist in the project area are those located within the project site. Within the one-mile zone, there are only 3 acres of row crops mapped. This category is also sometimes referred to as “truck crops” and should be distinguished from “Intensive Agriculture” (which generally includes operations such as chicken farms, dairies, and feed lots) and from “Field Crops” which are crops that require few inputs such as alfalfa, oats, wheat, and other similar crops.
- **Nurseries and greenhouses** are usually small in scale with respect to acreage. They typically contain structures used to cultivate high-value products such as flowering/foliage plants and gourmet food products such as mushrooms. They may also be used to grow commodities such as landscaping, decorative plants, fruit trees, herbs, and flowers. There are 306 acres present within the one-mile zone that fall into this category.
- **Estate residential** is a category in which agricultural operations are an incidental use to the large lot residence that is the primary land use. This category can be typically characterized by small orchards located on residential parcels approximately 2–4 acres in size. It should be noted that, although small in size, orchards that fall within this category can be an important agricultural resource because more than two-thirds of farms within San Diego County are between one and nine acres in size and four acres is the median farm size. Despite their small size, farms in San Diego County generated over \$1.6 billion in 2010. There are 724 acres of this category within the one-mile buffer area.
- **Undeveloped** - The remaining 2,500 acres within the one-mile zone around the site is comprised primarily of undeveloped open space with native habitat, although there are a few areas which may once have been agriculture that has been allowed to revegetate with native habitat types.

2.4.2 Analysis of Project Impacts and Determination of Significance

For the purpose of this EIR, the identified significance thresholds are based on criteria provided in Appendix G of the State CEQA Guidelines and the County’s Guidelines for Determining Significance – Agricultural Resources, adopted March 19, 2007. The project would result in a significant impact if it would:

1. *Direct Conversion of Agricultural Resources*: Result in the direct conversion of agricultural resources.
2. *Land Use Conflicts*: Conflict with a Williamson Act Contract or with existing zoning for agricultural use.

3. *Indirect Conversion of Agricultural Resources:* Involve other changes in the existing environment, which due to their location or nature, could result in conversion of a San Diego County agricultural resource to non-agricultural use.

2.4.2.1 Issue 1: Direct Conversion of Agricultural Resources

Guidelines for the Determination of Significance

Based on the County’s Guidelines for Determining Significance – Agricultural Resources, adopted March 19, 2007 (San Diego County 2007c), a significant impact would occur if the project has important agricultural resources as defined by the LARA Model; and the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of the site for agricultural use.

Analysis

LARA Model Analysis

The Agricultural Resources Technical Report (RECON 2013b; see Appendix F) includes a LARA Model analysis consistent with the County’s Guidelines. Based on the results of the LARA Model, the site is not considered an important agricultural resource as summarized in Table 2.4-3 below. Table 2.4-3 shows that the site received a low rating for soil quality and high ratings for climate and water resources. These three criteria are Required Factors, pursuant to the LARA Model, and a rating of low for any one required Factor automatically identifies the project site as not an important agricultural resource. Since one of the three Required Factors is rated low, there is no need to analyze the Complementary Factors found in the LARA Model. Based on Table 2.4-4, this result would place the project within Scenario 5, which means that the site is not an important agricultural resource.

**TABLE 2.4-3
LARA MODEL RESULTS**

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

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

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

Important On-site Agricultural Resources

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

The project would develop a total of 466.7 acres of the site for up to 1,746 dwelling units, a commercial village center, retail uses, a school site, and an active park/village green. The remaining approximately 141.3 acres of the site would remain as open space (38.7 as agriculture/common areas and 103.6 as biological/wetland habitat).

As shown on Table 2.4-1, there are a total of 63.4 acres of on-site soils (10 percent of the project site) that meet the Prime and Statewide Importance soil candidate criteria. However, based on the definition found on page 28 of the Agricultural Resources Guidelines (County of San Diego 2007c), 23.2 acres are “unavailable for agricultural use” based on the fact that they lie within areas previously developed with roads, residences, or native habitat that has not been previously disturbed by agriculture. The remaining 40.2 acres meet the criteria to be both classified as a soil of Prime or Statewide Importance and “available for agriculture.”

While the project includes areas shown for “common areas/agriculture” and “manufactured slopes” (see Table 1-1), which may be planted with citrus and avocado trees; these would be HOA-maintained and conservation easements are not proposed. Further, mass grading would be required to create the building pads and manufactured slopes. Therefore, in the worst case, all of the soils that meet the Prime and Statewide Importance soil candidate criteria would be converted to non-agricultural uses. Pursuant to the LARA Model analysis performed for the project, the site was rated as “Low” for

one of the three “Required Factors.” Therefore, direct impacts to important agricultural resources would be **less than significant**.

Off-site Improvement Impacts

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

1. **West Lilac Road:** The widening to 2.2F Light Collector west toward the Walter F. Maxwell Memorial Bridge would impact 1 acre of Other Land and 2.37 acres of Unique Farmland.
2. **Lilac Hills Ranch Road:** This private easement connection would affect 1 acre of land which is mapped as Farmland of Local Importance but which is a dirt road between two estate residential parcels that is not currently farmed.
3. **Covey Lane:** Widening this road from 28 feet to 40 feet would impact approximately 0.8 acre of Other Land and 0.35 acre of Unique Farmland (currently utilized for orchard crops).
4. **Street B:** These 310 feet of improvements along a 50-foot-wide private easement would impact 0.35 acre of Unique farmland and 0.04 acre of Farmland of Local Importance.
5. **Mountain Ridge Road:** This private easement connection would require 3,800 feet of improvements from the southern project boundary south to a connection with Circle R Drive. The 40-foot right-of-way required for this off-site improvement would impact 0.6 acre of Farmland of Local Importance, 0.5 acre of Other Land, and 0.9 acre of Unique Farmland.
6. **Rodriguez Road:** This 40-foot-wide graded road easement would be paved 24 feet from Lilac Hills Ranch Road to Covey Lane.
7. **Fire Station #15:** The off-site improvement options for the Miller Station. The site is disturbed by the existing fire station, driveway, and landscaping. The site is mapped by the FMMP as “Other Land.”

The direct impacts resulting from off-site roadway improvements to off-site agricultural resources and operations described above would be **less than significant** based on the following considerations: (1) the small impact acreages; (2) the locations generally occurring along ROW of existing roadways (even if private); and (3) the fact that no Prime Farmland or Farmland of Statewide Importance would be affected. Some small acreages mapped as Unique Farmland would be affected along West Lilac Road (off-site #1) and Mountain Ridge Road (off-site #7); however, these areas are within ROW of existing roadways and are not part of any active agricultural operations.

2.4.2.2 Issue 2: Land Use Conflicts

Guidelines for the Determination of Significance

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

- Proposes a non-agricultural land use within a one-quarter mile of an active agricultural operation or land under a Williamson Act Contract (Contract) and as a result of the project, land use conflicts between the agricultural operation or Contract land and the project would likely occur and could result in conversion of agricultural resources to a non-agricultural use;
- Proposes a school, church, day care, or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Contract and as a result of the project, land use conflicts between the agricultural operation or Contract land and the project would likely occur and could result in conversion of agricultural resources to a non-agricultural use; or
- Involves other changes to the existing environment, which due to their location or nature, could result in the conversion of off-site agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Contract.”

Analysis

Agricultural Zoning

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

In San Diego County, agriculture is allowed in any zone, and there are no exclusive agricultural zones. The proposed Specific Plan and Rezone would make the site’s zoning consistent with proposed use. The concept of the project is to create a village, which would be compatible with the rural/agricultural nature of Valley Center; thus, the Specific Plan does not preclude agriculture within the project site. Therefore, the project would not conflict with existing zoning, and impacts would be **less than significant**.

Williamson Act Contracts/Agricultural Preserves

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

Agricultural Preserve Number 88 is located directly adjacent to the southeast project boundary. However, pursuant to the General Plan, non-contracted lands within the adopted Agricultural Preserves will be removed from the “A” Designator, but the Agricultural Preserve will remain. While this removal has not yet been adopted, other County Policies and Regulations, as well as General Plan Goals and Policies, would still be in place to ensure the intended protections are achieved. Ultimately, to remove the “A” Designator, a Zoning Ordinance amendment is required. Because the project would not impact the Williamson Act contracted lands to the north, and Agricultural Preserve Number 88 adjacent to the project site is not within a Williamson Act Contract, impacts would be **less than significant**.

2.4.2.3 Issue 3: Indirect Conversion of Agricultural Resources

Guidelines for the Determination of Significance

Based the County of San Diego Guidelines for Determining Significance – Agricultural Resources (County of San Diego 2007c), the project would have a significant impact if it would involve other changes in the existing environment which, due to their location or nature, could result in conversion of a San Diego County agricultural resource to non-agricultural use.

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

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

Analysis

Proposed School Site

The California Department of Pesticide Regulation regulates pesticide sales and use and fosters reduced risk pest management with the goal of protecting human health. Locally, pesticide permits for field fumigation are issued by AWM. Relative to the siting of schools, the California Education Code (CEC) establishes the law for California public education. CEC requires that the DTSC be involved in the environmental review process for the proposed acquisition and/or construction of school properties that will use State funding.

A 12-acre school site is proposed within the south-central portion of Phase 3. There are no areas of row crops or nursery/greenhouses within the vicinity of the proposed school; but there are existing orchards to the south of the school site. The school site is approximately 325 feet from the project boundary. Figure 2.4-4 shows that the orchards directly south of the school site utilize aerial (helicopter) chemical applications as a means of pest control. Figure 2.4-4 also shows that aerial spraying on the property nearest the school occurred 5–10 times within the last five years, which equates to once or twice per year on average. These health concerns can cause complaints, which may cause indirect (compatibility) impacts from the proposed new on-site uses **to** the off-site agricultural resource. CCR Title 3, Division 6 regulates the application of pesticides and prohibits discharging pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. The regulations also require prevention or minimization of “drift” during aerial applications. Drift is a primary concern for neighboring property owners and the public, due to the possibility that pesticide drift may contribute to health concerns.

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

Park

The proposed park would also create concentrations of people and be a sensitive receptor. Further, the park, unlike the school, would be directly adjacent to the off-site orchards. In this case, the most likely compatibility impacts to the agricultural sites would be trespass, noise, liability concerns, theft and vandalism, water runoff and urban pollutants (from park irrigation). Possible compatibility concerns to the project would be pesticide drift and potential noise from nearby agricultural activities. This represents a **significant impact** at this location (**Impact AG-1**).

Institutional

The proposed “Institutional” land use lies within Phase 5 of the project, in the southernmost portion of the site. To the south there is a biological buffer ranging from 150 to 500 feet in width that provides a buffer between the institutional use and the agricultural operations located along the southern project boundary. The agricultural operations nearest (to the east) of the institutional use do not utilize aerial pesticide applications (see Figure 2.4-4) and the nearest operations that do are approximately 280 feet from the project boundary; however, because of the sensitive population involved with this use, this represents a **significant impact** at this location (**Impact AG-2**).

Age-Restricted

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

Group Residential

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

Urban/Agricultural Interface Compatibility

As stated in the General Plan Update EIR: "Conflicts at the agriculture/urban interface flow in two directions: from existing agricultural use to a newly established non-agricultural use and from a newly established non-agricultural use to existing agricultural use" (County of San Diego 2011c). Residential land uses are proposed adjacent to off-site farmland along portions of the project boundary.

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

Phase 1

The project design for Phase 1 incorporates biological open space and FMZ along the northwestern boundaries that are approximately 100 feet in width in most areas, but range between 50 and 100 feet (where alternative fuel management measures are recommended. Additionally, existing citrus groves or other common area landscaping would be retained around the not a part (NAP) water tanks located within the southwestern corner of Phase 1. The southeastern portion of Phase 1 lies within the proposed biological open space, which, in combination of fuel modification zones, would serve as a continuation of the aforementioned buffer along the southwestern boundary of the Phase 1 area. Despite the proposed biological open space and limited building

zones (LBZs), four AAs were identified within Phase 1; these are discussed in greater detail as follows:

- AA 1 is located along the northern project boundary. There is a large area of orchards located relatively close (approximately 150 feet) to residential uses proposed as part of Phase 1. However, there is an off-site residential parcel between the orchards and the project site. Thus, due to the intervening topography, the West Lilac Road ROW, and the off-site residential parcel, the existing separation would be adequate, and impacts would be **less than significant**.
- Located in the extreme northwestern corner of the project site, adjacent to Old West Lilac Road, AA 2 includes another large area of orchards which have been subject to aerial pesticide applications (see Figure 2.4-4). As discussed in subchapter 2.4.3 below, the approximately 44-acre Marquart Ranch (TM 5410) has filed a Final Map in the location of these orchards adjacent to the northwest corner of the project. There is a potential for compatibility impacts to arise in association with the remaining sliver of agricultural land directly adjacent to West Lilac Road. However, West Lilac Road is to be improved with 78 feet ROW width and there would also be between 50 and 90 feet of FMZ on-site. The combination of FMZ and ROW width would provide adequate separation between on-site uses and off-site agricultural operations to avoid edge effects and impacts would be **less than significant**.
- Adjacent to Standel Lane, AA 3 is also located along the northwestern corner of the project site. To the west (approximately 130 feet away) are an estate residence and groves, and a youth camp and religious retreat. As shown on Figure 2.4-4, this operation has not been subject to aerial spraying in the past 5 years; the likely reason being the presence of the existing residence. While the indirect-compatibility effects associated with AA 3 would not include aerial pesticide applications; other edge effects such as noise, dust, odors, and theft/trespass could still result in potential impacts. The ROW width of Standel Lane is only 20 feet, and does not, by itself, provide an adequate separation of land uses. This represents a **significant impact** at this location (**Impact AG-4**).
- AA 4 is located along the southwestern corner of Phase 1 near the existing water tanks. The project would retain a portion of the existing orchards surrounding the NAP water tanks. In addition, a park (Park "P-1") is proposed directly south of the water tanks. Off-site agriculture includes orchards directly west of the water tanks, as well as orchards and estate residences to the south of the water tanks. The proposed park, as well as the retention of existing orchards surrounding the water tanks would adequately buffer AA 4 from the off-site agriculture. However, those off-site areas within AA 4 that contain orchard trees but are not immediately adjacent to the on-site retained orchards would represent a **significant impact** at this location (**Impact AG-5**).

Development of Phase 1 would result in the construction of residential units in proximity to the mixed orchard operations occurring both north and south of West Lilac Road and west of Standel Lane. As discussed above, the cumulative project list includes the Marquart Tentative Map which may convert the existing orchards north of the northwest corner of the project site. Further, pursuant to the County's Agricultural Enterprises and

Consumer Information Ordinance, project design considerations including the dissemination of disclosure statements would be required in sales documentation for all proposed residential units. The statements would notify potential owners that the adjacent property could potentially be used for agricultural operations and that there could be associated issues such as odors, noise, and vectors. In addition, there would be on-site open space buffers, which occur in various locations within Phase 1 as either biological, agricultural, or landscaped open space, as well as FMZ areas. CCR Title 3, Food and Agriculture, Division 6, Pesticides and Pest Control Operations, would prohibit the discharge of pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. It also includes regulations and label requirements that prevent or minimize “drift” during aerial applications. Notwithstanding state law and project design considerations, **significant impacts** would occur at AA 3 and AA 4.

Phase 2

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

Phase 3

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

- As shown on Figure 2.4-7, AA 5 involves the placement of residential uses directly adjacent to the off-site groves that are surrounded on three sides, by the project. This represents a **significant impact** at this location (**Impact AG-6**).
- AA 6 is located along the northern boundary of VC11 (and south of the proposed school and public park (Park “P-10”). The school would be more than 300 feet away from the off-site agriculture, as the proposed park site intervenes. As addressed above, a **significant impact** would occur at this location (**Impact AG-1**) relative to the park itself (because of its sensitive users).
- The third area of potential indirect impacts within Phase 3 is AA 7, along the eastern boundary where the proposed residential uses are adjacent to off-site flower crop production with nursery/greenhouse uses. The production of cut flowers is a labor-intensive operation, but is not generally associated with dust or noise, as mechanized equipment is not used because of the nature of the crop. In addition, aerial spraying is not used for cut flower or nursery crops so pesticide use would not be a factor. With respect to indirect impacts to this flower operation

from the project, project design considerations associated with lighting would be required to assure all lighting is shielded and directed away from the off-site parcels (as described in Specific Plan Section 3.D.10). Additionally, the project includes an FMZ within AA 7. Notwithstanding the project design considerations, standard practice of flower farming and designation of the FMZ, the adjacency to off-site agricultural uses represents a **significant impact** at this location (**Impact AG-7**).

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

Phase 4

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

- The age-restricted residential uses along a portion of the western boundary of Phase 4 are within AA 8. There are intensively farmed groves to the west of Phase 4. These same groves are also associated with AA 5 and AA 6 as discussed above. Similarly, AA 8 would involve the placement of residential uses directly adjacent to the off-site groves that are surrounded on three sides by the project. As discussed above, this represents a **significant impact** at this location (**Impact AG-3**).
- The northeastern portion of Phase 4 contains residential uses that are adjacent to off-site agricultural groves (AA 9). A 100-foot FMZ is located at this location. Additionally, an 80-foot buffer would result from the proposed realignment of Covey Lane. Notwithstanding these proposed design features, adjacency to the off-site operations represent a **significant impact** at this location (**Impact AG-8**).

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

Phase 5

Phase 5 would be located directly south of Phase 4. Phase 5 is planned for 297 single-family senior residential units, approximately two-acres of parks, and 10.7 acres for institutional use. Also included in Phase 5 is a detention basin. As with Phase 4, Phase

5 has a large east-west trending biological open space corridor which runs along the southern project boundary. This biological corridor would include FMZ buffers, as well as retained agriculture, the total width of which would vary between 150 and 500 feet. AA areas 10 through 13 are analyzed further as follows:

- AA 10 is adjacent to active orchards, which are subject to aerial spraying. Notwithstanding the proposed FMZ, the adjacency of off-site operation represents a **significant impact** at this location (**Impact AG-9**).
- AA 11 is adjacent to off-site orchards while AA 12 adjoins off-site estate residential uses. The entire southern boundary of Phase 5 includes an east-west trending biological open space corridor (with some retained agriculture along the periphery). The width of this corridor varies from approximately 150 feet to 500 feet and would serve to ensure that indirect impacts would be **less than significant** for AA 11 and AA 12.
- There are nursery/greenhouse and flower crops along AA 13, to the east of Phase 5. The nearest pesticide applications occur approximately 280 feet from the project boundary. With respect to indirect impacts to this flower operation from the project; lighting would be required to be shielded and directed away from the off-site parcels (Specific Plan Section 3.D.10). However, the adjacency of off-site operations represents a **significant impact** at this location (**Impact AG-10**).

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

Interim Phasing

During the phased build-out of the project, the applicant/owner intends to continue leasing the property to farmers who operate the existing orchard and field crop operations throughout the project site. The potential adjacency issues which could occur during this interim period would represent a **significant impact (Impact AG-11)**.

Other Compatibility Issues

Stormwater Runoff

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

potential impacts associated with project runoff. Through the incorporation of the requisite LIDs, BMPs, and hydromodification design features, runoff potential would be to **less than significant**.

Hazardous Materials Storage

Any on-site storage of fuels or pesticides for use, within agricultural areas, whether long-term or in the interim during phasing, could result in significant impacts associated with homeowner complaints about hazardous materials storage practices by the adjacent farmers. This could also occur during interim phases where on-site agricultural operations could continue adjacent to new residents. Maintenance of on-site orchards would be regulated through provisions within the Master Covenants Conditions and Restrictions for the community. Such regulations would include an on-site ban on aerial pesticide spraying, restrictions on the types of fertilizers that could be used, and limitations on the types of equipment and hours of operation of maintenance activities. All pesticide and hazardous materials storage, on- or off-site would be required to comply with the state requirements and the applicable regulations enforced by the County Agriculture Weights and Measures. Notwithstanding storage protection measures and regulatory compliance, **significant impacts** could occur along the AAs identified above (**Impact AG-12**).

Invasive Pests and Pets

Non-native or invasive pests and pets can damage adjacent agriculture operations or be a costly nuisance to the farmer representing a **significant impact (Impact AG-13)**.

Pathogens/Diseases

The on-site equestrian trails, and use of trails buy domestic animals, could result in the spread of disease onto existing agricultural operations representing a significant impact (**Impact AG-14**).

Air Contaminant Generation

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

Nighttime Lighting

New development can be a source of nighttime lighting, which can affect the growth patterns of greenhouse crops. There are greenhouses located within the NAP parcel adjacent to Phase 2 and off-site approximately one-third of a mile to the east of the

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

2.4.3 Cumulative Impact Analysis

2.4.2.1 Issue 1: Direct Conversion of Agricultural Resources

A list of projects with a summary of project features is provided in Table 1-5. The cumulative agricultural effects of the project were evaluated based on Table 2.4-5 and Figure 1-24.

Cumulative Impacts to Important Farmland

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

Section 4.2.4 of the County's Guidelines states:

The guidelines for determining the significance of cumulative impacts are based on the same guidelines used to determine the significance of project level impacts (Guidelines 4.2.1, 4.2.2, and 4.2.3) except the analysis considers the significance of the cumulative impact of the individual project impact in combination with the impacts caused by the projects in the cumulative study area that would also impact important agricultural resources. A project that is determined not to be an important agricultural resource under the LARA Model that would not have significant indirect impacts to agricultural resources, and that would not conflict with agricultural zoning or a Williamson Act Contract would not have the potential to contribute to a cumulative impact.

Accordingly, and as discussed in the previous sections, the project is not an important agricultural resource, based on the LARA Model; impacts would be reduced to below a significant level, through mitigation with respect to indirect impacts; and the project would not conflict with a school, agricultural zoning, or a Williamson Act Contract. Therefore, the project would not have the potential to contribute to a cumulative impact.

Nevertheless, the project is located within an agricultural community and a quantitative discussion is also warranted. As shown in Table 2.4-6, the 12 cumulative projects together contain 444.5 acres of Important Farmland, and the project combined with the 12 cumulative projects (see Table 1-5) results in a total of 1,052 acres of potential impacts to Important Farmland within the cumulative study area. With respect to the cumulative study area, there is a total of 5,627 acres of important farmland (or 3,557 if excluding Other Land); and the project’s impacts would represent conversion of 11 percent of the study area total (or 14 percent if excluding Other Land). While the project’s impacts to Important Farmland represent 58 percent of the cumulative total (54 percent if excluding Other Land), or 11 percent of the study area total; it would be less than a tenth of one percent (0.000363) or 0.0023 (0.2 percent) if excluding “Other Land” when considered Countywide. Thus, while the loss of Important Farmland is considered significant, the project’s incremental contribution to this impact is **less than cumulatively considerable**.

**TABLE 2.4-6
ACRES OF FMMP FARMLAND WITHIN THE CUMULATIVE PROJECT AREA**

Category	Project Acres	Cumulative Projects	Total Cumulative	Study Area Total in 2008	County-wide Total in 2008
Other Land*	95.9	12.6	108.5	2,070	1,452,699
Farmland of Local Importance	146.3	62.1	208.4	1,124	153,187
Prime Farmland	0.0	0.1	0.1	24	7,753
Unique	329.2	365.5	694.7	2,305	51,975
Farmland of Statewide Importance	36.2	4.2	40.4	104	10,411
TOTAL	607.6	444.5	1,052.0	5,627	1,676,025

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

Cumulative Impacts to Agricultural Production

Fruit and nut crops, of which avocados and citrus comprise 86 percent, are 16 percent of the total value produced by agriculture in the County (avocados by themselves are 9 percent) and 12 percent (36,239 acres) of the total acreage. Approximately 33,420 acres of citrus and avocado crops were grown in San Diego County in 2010, representing a 14 percent decrease (4,813 acres) in acreage grown compared to 2009 (County of San Diego 2010a). Currently, approximately 292 acres (48 percent) of the project site are used for citrus and avocado production. The conversion of this acreage would represent 56 percent of the total when considered with the twelve identified cumulative projects (see Table 2.4-6). Compared to the study area’s 3,557 acres of avocado/citrus production, the project’s 292 acres of impacts would represent an 8.2 percent conversion.

The project includes 103.6 acres of biological open space and an additional 38.7 acres of agricultural open space where orchards would be an allowed use. Likewise, planting citrus and avocado trees on the manufactured slopes is planned as part of the project because it helps to retain the rural agricultural character. Further, community gardens and farmers’ markets would be allowed uses within the village green/Town Center in Phase 2. However, **significant cumulative indirect impacts** could occur (**Impact AG-15**).

2.4.2.2 Issue 2: Land Use Conflicts

All of the cumulative projects lie within the one-mile area where Williamson Act contract lands and agricultural preserve lands have been mapped (see Figure 1-24). None of the projects in the cumulative study area are identified as having conflicts with a Williamson Act Contract or lie within an agricultural preserve; nor would the project have any associated impacts. Additionally, as discussed above, the General Plan will remove the “A” Designator from agricultural preserves. Therefore, the cumulative impact to Williamson Act Contract lands and agricultural preserves would be **less than significant**.

2.4.2.3 Issue 3: Indirect Conversion of Agricultural Resources

Cumulative impacts related to farmland conversion could also result from edge effects, including trespassing, pilfering of crops, and damaged farm equipment. The pressure, inconvenience, and increased costs of operating remaining farms in areas converting to other uses may render continued farming infeasible or, at least, heighten the attractiveness of selling other farms for development. However, as discussed in subchapter 2.4.2.3 above, the edge (indirect) impacts associated with this project will be reduced to a level that is less than significant with the implementation of Mitigation Measure AG-1 (including fencing) and the project design considerations proposed for this project (see Table 1-3). The cumulative projects would be required to implement similar measures to reduce their urban/agriculture interface impacts. Thus, the project, even when considered in conjunction with the cumulative projects identified in Table 1-5, would not contribute to a cumulatively considerable indirect impact.

2.4.4 Significance of Impacts Prior to Mitigation

As discussed above, no significant impacts would result from the project in association with Williamson Act Contracts. Nor would the project have a significant direct impact pursuant to the LARA Model. The following significant indirect impacts related to agricultural adjacency would occur with project implementation:

- Impact AG-1:** The project would result in a significant adjacency issue associated with the on-site Park (P-10), also identified as AA 6.
- Impact AG-2:** The project would result in a significant adjacency issue associated with the institutional site.
- Impact AG-3:** The project would result in a significant adjacency issue associated with the age restricted area within Phase 4, also identified as AA 8.
- Impact AG-4:** The project would result in a significant adjacency issue associated with AA 3.
- Impact AG-5:** The project would result in a significant adjacency issue associated with AA 4.
- Impact AG-6:** The project would result in a significant adjacency issue associated with AA 5.

- Impact AG-7:** The project would result in a significant adjacency issue associated with AA 7.
- Impact AG-8:** The project would result in a significant adjacency issue associated with AA 9.
- Impact AG-9:** The project would result in a significant adjacency issue associated with AA 10.
- Impact AG-10:** The project would result in a significant adjacency issue associated with AA 13.
- Impact AG-11:** The project would result in a significant adjacency issue associated with interim on-site agricultural activities.
- Impact AG-12:** The project would result in a significant on and off-site adjacency issue associated with storage of hazardous materials.
- Impact AG-13:** The project would result in a significant adjacency issue associated with non-native pests or domestic pets.
- Impact AG-14:** The project would result in a significant adjacency issue associated with the spread of pathogens and disease.
- Impact AG-15:** The project would result in a significant cumulative impacts associated with potential loss of agricultural production.

2.4.5 Mitigation

- M-AG-1:** A 50-foot-wide agricultural buffer planted with two rows of the appropriate tree crop (e.g., citrus, avocado) shall be provided. This buffer shall be located where residential uses in the project abut existing, adjacent orchards and other agricultural operations in order to create a transition between the two uses.
- M-AG-2:** A 6-foot-high fence shall be maintained along the southern edge of the park (AA 6) and at the project boundary along AAs 3 through 10 and 13 in order to prevent intrusion by people and domesticated pets.
- M-AG-3:** A Limited Building Zone prohibiting habitable structures as well as any structure which could result in residents, visitors, or children to congregate within close proximity to the AA areas (and the proximate agricultural operations). The prohibition would extend to (but is not limited to) ball fields, swimming pools, horseshoe pits, picnic areas, or any other use that would attract or keep people near the project boundary or AA. This mitigation would be implemented at AAs 3, 4, 6 through 10, and 13.
- M-AG-4:** The applicant/HOA shall exercise control over interim agricultural operations on-site through specific terms of agricultural leases. Through the execution of agricultural leases, the applicant/HOA will prohibit aerial

pesticide spraying and will take all precautions to minimize other impacts (both to and from future residents) including noise and dust generation, trespassing, and vandalism. All storage and use of hazardous materials and pesticides within these agricultural areas shall comply with all State Law and the County Agricultural, Weights and Measures Regulations.

2.4.6 Conclusion

The project was analyzed pursuant to the County's LARA Model, and no significant direct impacts were found relative to the direct conversion of important soils or other agricultural resources (Issue 1). Similarly, the project was found to have a less than significant impact in association with agricultural zoning or Williamson Act conflicts (Issue 2).

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

Mitigation Measure M-AG-1 would be implemented at AAs 3 through 10 and 13 and would reduce significant adjacency impacts by creating adequate buffer between off-site agricultural activities and on-site uses. AA 9 would include a single row of trees, staggered between the road alignment, due to the additional separation of uses afforded by the improvement of Covey Lane at this location. This would provide adequate buffering at AA 9. County Guidelines recognize that there is no scientific literature available that provides guidance as to exactly what buffer widths are required for each type of compatibility impact; but buffers are nevertheless, the most important tool to minimize interface conflicts. This mitigation measure would also serve to reduce impacts associated with hazardous materials storage, non-native pests and pets, and spread of pathogens. Therefore, M-AG-1 would reduce significant impacts at these interface locations to below a level of significance.

Mitigation Measure M-AG-2 requires the maintenance of a 6-foot-high fence along AAs 3 through 10 and 13. This mitigation measure would serve to create a barrier to prevent trespass and intrusion by domesticated pets at these locations resulting in significant adjacency impacts to be reduced to less than significant.

Mitigation Measure M-AG-3 would place an LBZ at AAs 3, 4, 6 through 10, and 13 that restricts the placement of structures. This mitigation measure would prohibit all structures and attractive features (e.g., gazebos, sheds, decks), as opposed to just habitable structures, in order to reduce significant adjacency impacts to less than significant levels.

Mitigation Measure M-AG-4 ensures that interim agricultural uses, as the project is phased in over time, would not result in significant indirect impacts. Interim on-site agricultural operations will be subject to lease agreements prohibiting aerial pesticide spraying and will take additional precautions to minimize other impacts (both to and from future residents) including noise and dust generation, trespassing, and vandalism.

Cumulative impacts were discussed in subchapter 2.4.3 above, and were analyzed based on the same Issues 1, 2, and 3 discussed for direct/indirect impacts. Pursuant to the Guidelines, a project that is determined: (1) not to be an important agricultural resource under the LARA Model; (2) would not have significant indirect impacts to agricultural resources; or (3) would not conflict with agricultural zoning or a Williamson Act Contract, would not have the potential to contribute to a cumulative impact. The proposed project has less than significant impacts with respect to issues 1 and 2 as discussed above. The project generates significant indirect adjacency impacts, but these are mitigated through Mitigation Measures M-AG-1 through M-AG-4. Any cumulative project with similar impacts would be required to mitigate in a similar fashion; thus, no significant cumulative impacts associated with agricultural adjacency would result. Therefore, cumulative impacts in association with the project would be less than significant.

Details of the location of each mitigation measure associated with each agricultural adjacency area are illustrated in Figures 14a through 14i of the Agricultural Resources Report (see Appendix F).

No other mitigation is required for agricultural adjacency control. Implementation of the above mitigation measures would assure that all significant project-related agricultural impacts would be reduced to less than significant.

**TABLE 2.4-1
ON-SITE SOIL RESOURCES**

Soil Map Unit	Project Acres	Available for Agriculture Use	Unavailable for Agriculture Use	Proportion of Site Available	Prime or Statewide 1 for Yes; 0 for No	Matrix Score
Bonsall sandy loam, 9 to 15 percent slopes, eroded [^]	7.15	6.93	0.22	0.017	1	0.017
Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes	168.73	115.88	52.85	0.289	0	0.000
Cieneba coarse sandy loam, 15 to 30 percent slopes, eroded	53.43	32.01	21.42	0.080	0	0.000
Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded	0.24	0.16	0.08	0.000	0	0.000
Cieneba rocky coarse sandy loam, 9 to 30 percent slopes, eroded	9.86	7.56	2.30	0.019	0	0.000
Fallbrook rocky sandy loam, 9 to 30 percent slopes	3.41	0.84	2.57	0.002	0	0.000
Fallbrook sandy loam, 15 to 30 percent slopes, eroded	210.14	148.80	61.34	0.371	0	0.000
Fallbrook sandy loam, 5 to 9 percent slopes, eroded [^]	32.59	25.24	7.36	0.063	1	0.063
Fallbrook sandy loam, 9 to 30 percent slopes, severely eroded	12.94	10.72	2.22	0.027	0	0.000
Greenfield sandy loam, 5 to 9 percent slopes [*]	4.46	0.94	3.52	0.002	1	0.002
Placentia sandy loam, 2 to 9 percent slopes [^]	10.20	6.97	3.24	0.017	1	0.017
Placentia sandy loam, 9 to 15 percent slopes, eroded	3.93	3.75	0.18	0.009	0	0.000
Steep gullied land	81.46	40.44	41.01	0.101	0	0.000
Visalia sandy loam, 2 to 5 percent slopes [*]	8.98	0.14	8.84	0.000	1	0.000
TOTAL	607.53	400.38	207.15	1.000		0.100

*Prime farmland soil.

[^]Farmland of statewide importance soil.

**TABLE 2.4-5
LILAC HILLS RANCH - CUMULATIVE PROJECTS EVALUATION**

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

**TABLE 2.4-5
LILAC HILLS RANCH - CUMULATIVE PROJECTS EVALUATION
(continued)**

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

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

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