Agricultural Conversion Analysis

for

Dabbs Tentative Map
TM 5346
ER# 02-03-067
APN 127-071-38

Prepared For: County of San Diego
Department of Planning and Land Use

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Glossary of Terms and Acronyms

AWM	County Department of Agriculture, Weights and Measures
CEQA	California Environmental Quality Act
CSA	Community Supported Agriculture
CWA	County Water Authority
DOC	State of California, Department of Conservation
DWR	State of California, Department of Water Resources
EDA	Estate Development Area
FHA	Farm and Home Advisor
FMMP	California Farmland Mapping and Monitoring Program
FPPA	Federal Farmland Protection Policy Act
GIS	Geographic Information System
LAFCO	Local Agency Formation Commission
LARA	Local Agricultural Resource Assessment Model
LCC	Land Capability Classification
LESA	Land Evaluation and Site Assessment Model
MUP	Major Use Permit
MWD	Municipal Water District
NASS	National Agricultural Statistics Service
NEPA	National Environmental Policy Act
NRCS	Natural Resources Conservation Service
SWP	State Water Project
SI	Storie Index
TDS	Total Dissolved Solids
UCCE	University of California Cooperative Extension
ZOI	Zone of Influence

Summary

The Dabbs Tentative Map (TM 5346) consists of 38.4 acres located between West Lilac Road to the north, Aqueduct Road to the west, and Old Highway 395 to the east in Bonsall, San Diego County. This project proposes nine single-family homes with a minimum parcel size of four acres each. The site is currently under agricultural production consisting of a container plant nursery. Minimum four-acre lot sizes proposed for the project are consistent with the parcel sizes of surrounding agricultural operations mixed with rural residences. These surrounding areas of smaller family-owned farms, characteristic of farms throughout San Diego County, have successfully produced a variety of agricultural products.

The project has been evaluated using the Local Agricultural Resource Assessment (LARA) Model for assessing the significance of agricultural resources. LARA Model Instructions are included as Attachment A of this analysis. The evaluation determined that the site is not an important agricultural resource. Proposed parcel sizes ranging from 4.1 to 4.6 acres are adequate to support agricultural operations onsite. The project will not result in significant impacts because although there is no guarantee that agriculture will continue on potential lots, parcel sizes as small as two acres have been shown as viable agricultural operations in San Diego County according to the Department of Agriculture, Weights & Measures (AWM). The project will not substantially impair the possibility of future agricultural uses onsite because four-acre lots are proposed and agricultural uses are encouraged throughout this area.

The project will not result in significant offsite agricultural resource impacts. The proposed lot sizes are consistent with the combined agricultural and low-density residential development that has occurred in the surrounding area. The project does not propose changes that could result in the conversion of agricultural uses offsite.

The project is consistent with the (19) Intensive Agriculture designation of the San Diego County General Plan, the A-70 zoning designation, and with all agricultural policies and goals contained in the Bonsall Community Plan. Therefore, no significant agricultural impacts are associated with planning aspects of the project.

A cumulative study area was defined within the San Luis Rey River Valley, between Bonsall and Interstate 15. The study area yielded a total of 37 projects that needed to be examined. Initially, each project was screened using criteria in the County of San Diego Guidelines for Determining Significance, Agricultural Resources. Cumulative projects that did not substantially impair the

viability of surrounding agriculture as determined in the Guidelines were then eliminated. This resulted in the elimination of twenty-five projects.

A detailed examination of the remaining projects indicated that the project, in combination with other anticipated development in the area would result in the loss of ten acres of Prime Farmland or Farmland of Statewide Importance. The study area includes 787 acres of Prime Farmland or Farmland of Statewide Importance. Within the study area, the ten acres of Prime Farmland or Farmland of Statewide Importance being lost represents approximately 1.27 percent of Prime Farmland of Farmland of Statewide Importance, which is not cumulatively significant.

Potential loss of Prime Farmland or Farmland of Statewide Importance was also examined on a regional basis through the 2008 San Diego County Crop Report. This report indicates that agricultural acreage in San Diego County increased by 3,775 acres between 2007 and 2008. Between 1998 and 2008, the area in agricultural production in the County increased from 172,262 to 312,766 acres, an increase of 81 percent. Agricultural acreage in San Diego County has substantially increased over this ten year period, despite isolated losses of important farmland. The loss of ten acres of Prime Farmland or Farmland of Statewide Importance is not cumulatively significant, given the fact that agricultural land in production in San Diego County has increased, between 1998 and 2008, by 140,504 acres. Therefore, no cumulatively significant agricultural impacts will occur from the project in combination with other anticipated projects in the study area. None of the cumulative projects analyzed will result in significant direct or indirect impacts to agricultural resources in the area.

1. INTRODUCTION

1.1. Purpose of the Report

The purpose of this agricultural report is to identify and discuss all relevant land use issues onsite and offsite in the vicinity of the project to determine potential impacts to surrounding active agricultural operations and/or Williamson Act contracts and agricultural preserves. The importance of onsite agricultural resources will be determined by applying the Local Agricultural Resource Assessment (LARA) Model, which takes into account factors such as water, climate, soil quality, surrounding land uses, land use consistency, and topography. Offsite impacts and conformance with the agricultural policies of the County are also assessed. Cumulative impacts to agricultural resources are assessed, and project design elements and/or mitigation measures that would minimize potential significant adverse effects are identified as needed.

1.2. Project Location and Description

Dabbs TM 5346 [Assessor's Parcel Number (APN) 127-071-38] is located between West Lilac Road to the north, Aqueduct Road to the west and Old Highway 395 to the east in Bonsall, San Diego County. See Figure 1, "Regional Vicinity Map," page F-1, and Figure 2, "USGS Bonsall Quadrangle 7.5' Map," page F-2.

The project consists of 38.4 acres and proposes nine residential parcels with sizes ranging from 4.0 gross acres to 4.6 gross acres each, shown in Figure 3, "Plot Plan on Aerial Photograph," page F-3. Currently, the site is in agricultural production of container plant stock. Access to the site is from Old Highway 395 along the eastern boundary.

1.3. Analysis Methods

The following data resources were used in the preparation of this report: 1) US Department of Agriculture Soil Conservation Service and Forest Service Soil Survey San Diego Area, California, 2) County of San Diego Department of Agriculture, Weights & Measures (AWM) Crop Statistics & Annual Reports, 3) County of San Diego Department of Planning and Land Use (DPLU) Geographic Information System (GIS) Valley Center Discretionary Project Map, 4) Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) San Diego County Important Farmland Map, 5) DPLU GIS Soil Candidates for Prime Farmland and Farmland of Statewide Importance, 6)

DPLU GIS Areaclimates and Generalized Western Plantclimate Zones, and 7) DPLU GIS County Water Authority (CWA) Boundary and Groundwater Aquifer Types.

The site was mapped using aerial photo interpretation and the USGS Bonsall Quadrangle 7.5' map. The FMMP map and County of San Diego Department of Public Works (DPW) GIS map were also used for mapping the site.

1.4. Environmental Setting (Existing Conditions)

1.4.1. Regional Context

Topography of the Bonsall area is characterized by a series of hills, valleys, and drainage areas. Its elevation varies from 170 feet to over 800 feet above sea level.

Bonsall's climate is warm during summer months when temperatures tend to be in the 70's, and cool during winter months when temperatures tend to be in the 50's. Rainfall generally occurs from late fall and continues through the spring months.

Water resources in Bonsall are supplied by the Rainbow Municipal Water District and/or private wells.

Bonsall soil types include Vista, Fallbrook, Cieneba, Placentia series, and others that are generally only suitable for crops with irrigation and careful management. Avocados and citrus are grown in areas of favorable temperature only with irrigation. A few small areas are used for growing winter truck crops. Grain and hay are grown without irrigation on areas of moderate slope. Range is a common use in areas that are not cultivated. Natural vegetation in Bonsall consists of annual grasses as well as forbs and shrubs such as California sagebrush, scrub oak, lilac, chamise, sumac, and flattop buckwheat.

The Bonsall area consists primarily of rural residential lots and agricultural land uses, and is known for its golf courses and equestrian facilities. Commercial activity in Bonsall is centered in the Mission Road/Olive Hill Road and Highway 76 area. The community of Fallbrook lies to the north, Valley Center to the east, the City of Oceanside to the west, and Vista to the south.

The relationship of the project site to surrounding areas is shown in Figure 4, "Regional Aerial Photograph," page F-4. Most land surrounding the project consists of rural residential and agricultural uses. A legend (Figure 5, "Farmland Mapping &

Monitoring Program (FMMP) Map Legend," page F-5) and map (Figure 6, "Regional FMMP Map," page F-6) identify the FMMP designations in the region.

1.4.2. Onsite Agricultural Resources

The project site has supported a container-stock nursery since 2005. Approximately 3.3 acres (nine percent) of the site is classified as Prime Farmland soil and 0.8 acres (two percent) of the site is classified as Farmland of Statewide Importance.

1.4.2.1. Soils

The Land Capability Classification (LCC) system classifies soils according to their limitations when cultivated and according to the way that they respond to management practices. Class I soils have no significant limitations for raising crops. Classes VI through VIII have severe limitations, limiting or precluding their use for agriculture. Capability subclasses are further defined by adding a subclass letter to the class designation. Capability subclasses are e, w, s, or c. The letter 'e' shows that the main limitation is risk of erosion. The letter 'w' indicates that water in or on the soil interferes with plant growth or cultivation. The letter 's' indicates that the soil is limited mainly because it is shallow, droughty, or stony. Finally, the letter 'c' is used only in some parts of the United States where cold or dry climates are a concern. Groupings are made according to the limitation of the soils when used to grow crops and the risk of damage to soils when they are used in agriculture. Productive agriculture in San Diego County typically occurs on soils having LCC ratings of III and IV, and a significant number of local soils have the class designations e and s, indicating limitations related to erosion and shallow soils. Capability units are assigned Arabic numbers that suggest the main kind of limitation responsible for placement of the soil in the capability class and subclass.

There are seven soil types found on the project site. The Soil Survey, San Diego Area, California, describes these soil types as follows: 1) Cieneba coarse sandy loam (ClD2), 5 to 15 percent slopes, eroded, 2) Fallbrook sandy loam (FaC), 5 to 9 percent slopes, 3) Fallbrook sandy loam (FaD2), 9 to 15 percent slopes, eroded, 4) Fallbrook sandy loam (FaE3), 9 to 30 percent slopes, severely eroded, 5) Fallbrook-Vista sandy loams (FvD), 9 to 15 percent slopes, 6) Placentia sandy loam (PeC), 2 to 9 percent slopes, and 7) Steep gullied land (StG).

The LCC rating for ClD2 is VIe-1(19). Fertility is low to medium, runoff is slow to rapid, and erosion hazards are slight to high. This soil is used for flowers, range, and avocados. Twelve percent of the site consists of this soil type.

The LCC for FaC is IIIe-1(19), indicating that fertility is medium, and that this type of soil is best suited for growing citrus, truck crops, tomatoes, flowers, dryfarmed grain, range, and avocado. Approximately nine percent of the site consists of this soil type. Runoff is slow to medium and erosion hazards are slight to moderate for FaC.

The LCC for FaD2 is IVe-1(19), indicating that fertility is medium, and that this type of soil is best suited for growing citrus, tomatoes, flowers, range, and avocados. Approximately thirty percent of the site consists of this soil type. Runoff is medium to rapid and erosion hazards are moderate to high for FaD2.

For FaE3 the LCC is VIIe-1(19). This soil type has low fertility and is suited for range, and vineyards. Approximately two percent of the site consists of this soil type. Runoff is medium to rapid and the erosion hazard is moderate to high for FaE3.

The LCC for FvD is IVe-1(19), indicating that fertility is medium, and that this type of soil is best suited for growing citrus, flowers, tomatoes, range, and avocado. Twenty-seven percent of the site consists of this soil type. Runoff is medium to rapid and erosion hazards are moderate to very high for FvD.

For PeC the LCC is IVe-3(19). This soil type has low to medium fertility and is suited for such crops as tomatoes, flowers, and a few selected crops. Runoff is slow to medium and the erosion hazard is slight to moderate. PeC is classified as Farmland of Statewide Importance according to the FMMP Soil Candidate Listing. Approximately two percent of the area onsite consists of this soil type.

For StG the LCC is VIIIe-1(19,20). This soil type (approximately eighteen percent of the site) has no farming value according to the soil survey. However, citrus has previously been grown in this area onsite. Runoff is rapid and the erosion hazard is high. This soil type is generally suitable for watershed and wildlife habitat.

Storie Index (SI), a measure of soil quality, expresses numerically on a 100 point scale the relative degree of suitability or value of a soil for general intensive agriculture. Higher SI ratings indicate higher quality soils. The SI rating is based on several factors including profile characteristics (affecting root penetration), surface soil texture (affecting ease of tillage and capacity of soil to hold water), slope (affecting soil erosion), and other unique limiting factors of the soil such as poor drainage, high water table, salts, and acidity. Productive agriculture in San Diego County typically occurs on soils with low SI ratings (typically in the 30s).

The SI for ClD2 is 16, indicating suitability for pasture and range. FaC soils have a SI of 57, indicating suitability for a few crops or special crops, and requiring special management. The SI for FaD2 is 48, indicating suitability for a few crops or crops that require special management. FaE3 soils have a SI of 37, indicating severe limitations for crops. If used for crops, these soils require careful management. The SI for FvD is 54, indicating suitability for a few crops or crops that require special management. PeC soils have a SI of 49, indicating suitability for a few crops or crops that require special management. StG soils have a SI of <10, indicating soils and lands generally not suited to agriculture.

Soils on the site and in the vicinity are shown in Figure 7, "Soils Map," page F-7.

1.4.2.2. FMMP Farmland Designations and Soils

The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status. The best quality lands are called Prime Farmland and Farmland of Statewide Importance. Maps are updated every two years, with current land use information gathered from aerial photographs, a computer mapping system, public review, and field reconnaissance. The minimum mapping unit is ten acres. The DOC Prime Farmland, Farmland of Statewide Importance, and Unique Farmlands are referenced in the California Environmental Quality Act (CEQA) Guidelines, Appendix G, as resources to consider in an evaluation of agricultural impacts.

The FMMP Farmland soils are based on local soil characteristics and irrigation status, with the best quality land identified as Prime Farmland and Farmland of Statewide Importance. The DOC 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 Natural Resources Conservation Service (NRCS) and are unique to each county. In San Diego County, 44 local soils qualify for the Prime Farmland designation and 65 soils qualify for the Farmland of Statewide Importance designation. These soil criteria include a much broader range of soils than the FMMP Farmland designations detailed above.

There are 3.3 acres (nine percent of the site) of FaC soils, classified as Prime Farmland. Areas covered by the PeC soil type (approximately 0.8 acres, or two percent of the site) are classified as Farmland of Statewide Importance. The site is shown in Figure 8, "Site on FMMP Map," page F-8. Definitions of all FMMP Farmland Categories are provided in Attachment B, "Important Farmland Mapping Categories," and Figure 5. Figure 9, "Zone Of Influence on FMMP Soils Map," page F-9, shows the vicinity FMMP soils.

1.4.2.3. History of Agricultural Use

The site has historically been used for growing citrus trees. Review of aerial photographs indicates that grove trees were first planted in the 1960s[1].

In 2005, the grove trees were removed and replaced with a container plant-stock nursery. It has continued to operate as a container plant-stock nursery since.

1.4.2.4. Climate

Bonsall's climate is warm during the summer when average temperatures range from 67 degrees (°) Fahrenheit (F) to 72°F, and cool during the winter, when temperatures range from 56°F to 58°F. The warmest month of the year is August with an average maximum temperature of 83.70°F, while the coldest month of the year is December with an average minimum temperature of 44.90°F. Temperature variations between night and day tend to be moderate during summer with a difference that can reach 21°F, and moderate during winter with an average difference of 23°F. The annual average precipitation in Bonsall is 13.69 Inches. Rainfall is fairly evenly distributed throughout the year. The wettest month of the year is January with an average rainfall of 3.13 Inches. Average humidity for this area is approximately 70 percent.

[1] http://www.historicaerials.com/

A 1970 University of California Cooperative Extension (UCCE) book titled, "Climates of San Diego County: Agricultural Relationships," has identified five areaclimates: maritime, coastal, transitional, interior, and desert. Climatic conditions within each areaclimate are similar. The UCCE book also identified more detailed plantclimates, defined as a "climates in which specific plants, groups, or associations are evident and will grow satisfactorily, assuming water and soil are favorable," (Close, et. al., 1970). Areaclimates and Plantclimates of San Diego County are represented in Attachment C, "Areaclimates and Generalized Western Plantclimate Zones." Adapted from the plantclimates outlined in the UCCE study, Generalized Western Plantclimate Zones, or "Sunset Zones" (from the Sunset Western Garden Books that popularized their usage) were developed to further differentiate the effects that latitude, elevation, ocean versus continental air mass influence, and local terrain have on microclimates, freezing, air, and water drainage. Sunset Zones are not intended to determine suitability for specific crops, rather they are a measure of overall climate suitability for the typical agricultural commodities produced in San Diego County. The Sunset Zone designations take into account the USDA hardiness rating which identifies the lowest temperature at which a plant will thrive. Sunset Zones range from Zone 1, representing the coldest winters in the west, to Zone 24, which represents the maritime influence.

The site is located within Zone 23, which is a coastal areaclimate dominated exclusively by the Maritime influence, making it most favorable for growing subtropical plants and avocados. Topography is important in this zone because its foothills and steep, rocky slopes provide ideal conditions for excellent air and water drainage essential for preventing root rot in avocados. Zone 23 temperatures are mild. However, severe winters have resulted in lows in some areas ranging from 23° to 38°.

Coastal areaclimates allow year-round production due to mild temperatures throughout the year. These climates are also located in proximity to transportation infrastructure, facilitating efficient product delivery to market. These factors make agriculture the most highly favorable and productive in the coastal areaclimate. Commercial crops in Bonsall include subtropical plants and avocados.

1.4.2.5. Water Resources

Imported metered water from the Rainbow Municipal Water District serves the project. There is one non-operational well onsite.

The underlying aquifer is composed of fractured crystalline rock, which typically yields low volumes and production of water compared to other aquifer types. Fractured crystalline rock aquifers are found mostly in the mountainous areas of San Diego County, and their characteristics vary greatly depending on the underlying fracture locations and orientations. Underlying aquifer types of San Diego County are shown in Attachment D, "County Water Authority Boundary and Groundwater Aquifer Types."

1.4.2.6. Williamson Act Contracts and Agricultural Preserves

Known formally as the California Land Conservation Act of 1965, the Williamson Act Contract was formed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The program entails a ten year contract between the City or County and an owner of land whereby the land is taxed on the basis of its agricultural use rather than its market value. The land becomes subject to certain enforceable restrictions, and certain conditions need to be met prior to approval of an agreement.

The underlying goals of the Williamson Act are to protect agriculture and open space. The legislature found that "the discouragement of premature and unnecessary conversion of agricultural land to urban uses is a matter of public interest," and that "agricultural lands have a definitive public value as open space," (Government Code, §51220[c][d]).

During the past 25 years, very few property owners have requested Contracts on their land within San Diego County. This lack of interest may be due to the fact that Proposition 13 has substantially slowed increases in property taxes. According to information from the County Assessor's Office, only two contracts were executed in San Diego County between 1980 and 2005, and 40 parcels currently under a Contract are in the process of non-renewal. The nonrenewal process takes ten years to complete, during which time property taxes are

incrementally raised to remove the tax benefit, with restrictions to development being lifted at the end of the ten year period. Attachment E of this analysis shows the Williamson Act Contract Lands in San Diego County.

The site is not under a Contract and is not within an Agricultural Preserve. Contract lands are shown in Attachment E, "Williamson Act Contract Lands."

1.4.3. Offsite Agricultural Resources

Agricultural resources within the site's Zone of Influence (ZOI) were identified. There are no lands within the 419-acre ZOI under a Williamson Act Contract or Agricultural Preserve.

The FMMP Farmland designations within the ZOI include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Other Land. The majority of the ZOI consists of Unique Farmland. The surrounding area within the ZOI is shown in Figure 9, "Zone Of Influence On FMMP Map," page F-9. Refer to Figure 5 for the definitions of FMMP designations.

Agricultural operations within the site's ZOI consist largely of avocado trees, various types of citrus groves, and produce and flower operations. Avocado and citrus orchards are located to the west and north of the site; many having less than five-acre parcel sizes. Flower and produce operations are located to the south of the site. Adjacent to the east of the project it appears there has been an expansion of the nursery. This parcel is not the same ownership as the project, as shown in Attachment G, Adjacent Property Ownership Information. Therefore, it is not appropriate to include this parcel in the agricultural analysis. Biological issues resulting from the clearing are being addressed separately. Interstate fifteen (I-15) is located east of the site. These uses are located within a mixture of rural residential and commercial agricultural areas that include both hobby and commercial agricultural activities. Figure 10, "Zone Of Influence On Aerial Photograph," page F-10, identifies agricultural resources within the ZOI. Types of agricultural activities generated may include cultivation, plowing, spraying, pruning, harvesting, application of chemicals, transportation of produce, and farm labor transportation. Surrounding land parcel sizes are shown in Figure 11, "Zone Of Influence Parcel Sizes," page F-11.

1.4.4. Zoning and General Plan Designation

The project is zoned A70 Limited Agricultural Use per the County Zoning Ordinance, which is intended to create and preserve areas intended primarily for agricultural crop production while allowing single-family residential uses. Zone A70 permits a minimum lot size of two acres. Based on the A70 zoning designation, 19 dwelling units would be permitted on the site. The project proposes only nine dwelling units over the 38.4-acre site.

The site's (19) Intensive Agriculture General Plan designation is intended to promote a variety of agricultural uses including minor commercial, industrial, and public facility uses appropriate to agricultural operations or in support of the agricultural population. This designation permits two-, four-, and eight-acre parcels under specified conditions

The project proposes lots ranging in size from 4.0 acres to 4.6 acres. The project conforms to the County Land Use Element-(19) Intensive Agriculture requirements for four-acre lot sizes. There are no average slopes greater than 25 percent on the site.

2. ONSITE AGRICULTURAL RESOURCES

2.1. Local Agricultural Resource Assessment (LARA) Model

The County of San Diego has approved a methodology that is used to determine the importance of agricultural resources in the unincorporated area of San Diego County, known as the Local Agricultural Resource Assessment (LARA) Model. The LARA Model evaluates six factors in determining the importance of agricultural resources, which are water, climate, soil quality, surrounding land uses, land use consistency, and slope. Each factor is given a high, medium, or low rating. If any of the required water, climate, or soil quality factors are rated low, the site is not considered a significant agricultural resource. Detailed LARA Model instructions are included as Attachment A and provide background information regarding the purpose and justification of each factor.

2.1.1. LARA Model Factors

2.1.1.1. Water

Since metered water is currently supplied to the site through the Rainbow Municipal Water District, the LARA Model water rating for the site is high. Sites with availability of imported water always receive the highest water rating regardless of groundwater availability because the availability of imported water is essential for the long term viability of agriculture due to the limited natural rainfall and limited availability of groundwater resources in the County. Table 3, "Water Rating," on page 21 of Attachment A, LARA Model Instructions, summarizes the ratings.

2.1.1.2. Climate

As detailed in Section 1.4.2.4 above, the site is located in Zone 23, which translates to a high LARA Model climate rating. Zone 23 is rated highly because this climate zone is the most favorable for growing some of the County's most productive crops. Zone 23 is also favorable due to its location close to urban areas and transportation infrastructure which facilitates product delivery to market. Table 6, "Climate Rating," on page 26 of Attachment A, LARA Model Instructions, summarizes the ratings.

2.1.1.3. Soil Quality

The LARA Model's soil quality rating for the site is low. The site has a Soil Quality Matrix score of 0.09, which is below the threshold of 0.33. There are no contiguous Prime Farmland or Statewide Importance Soils of at least ten acres on the site. Table 1, "Soil Quality Matrix," page T-1 of this analysis, shows how these ratings are attained. Table 8, "Soil Quality Matrix Interpretation," on page 31 of Attachment A, LARA Model Instructions, summarizes the ratings.

2.1.1.4. Surrounding Land Uses

The site has a high Surrounding Land Use rating based on the LARA Model. The percentage of land within the Zone of Influence (ZOI) that is compatible with agriculture is greater than 50 percent, resulting in the site's high rating. Consideration of surrounding land uses within the ZOI is intended to provide a comparable measurement of the long-term sustainability of agriculture at the project site. Table 9, "Surrounding Land Use Rating," on page 33 of Attachment A, LARA Model Instructions, details how the rating is obtained. Figure 10, "ZOI On Aerial Photograph," page F-10 shows the surrounding land area.

2.1.1.5. Land Use Consistency

The site's land use consistency rating is moderate. The project's median parcel size of 4.2 acres is consistent with the median parcel size within the project's ZOI, which is approximately 4.0 acres. Land use consistency is used as a measure of importance to recognize the effect that surrounding urbanization has on the viability of ongoing agricultural uses. A site surrounded by larger parcels usually indicates that the area in which the site is located has not already been significantly urbanized, therefore indicating that the area is more likely to continue to support viable agricultural uses. On the other hand, a site surrounded by smaller parcels indicates a lower likelihood of ongoing commercial agriculture viability considering the greater expectations of land use

incompatibilities that the site is likely to experience. The site is equal in median parcel size to the surrounding area median parcel size. The project's land use consistency shows that agriculture is able to remain a viable use on the proposed parcels since agricultural use is typical of the surrounding area. Table 10, "Land Use Consistency Rating," on page 35 of Attachment A, LARA Model Instructions, summarizes the ratings. Figure 11, "Zone Of Influence Parcel Sizes," on page F-11, shows the surrounding parcel sizes within the ZOI.

2.1.1.6. Slope

The site's slope rating is high. Using the soil survey criteria, average slope that is available for agricultural use on the site is less than 15 percent, as shown in Table 1. The majority of the site (90 percent) consists of soil types with 2 to 15 percent slopes. Six percent of the site consists of a soil type with 15 to 30 percent slopes, and four percent is made up of steep gullied land. Table 11, "Slope Rating," on page 35 of Attachment A, LARA Model Instructions, summarizes the ratings.

2.1.2. LARA Model Result

Based on Table 2, "Interpretation of LARA Model Results," page 20 of Attachment A, LARA Model Instructions, the site is not an important agricultural resource. The site falls under Scenario 5, which states that if one required factor is rated low, the site is not an important agricultural resource. Because the soil rating is low (a required factor), as detailed above in Section 2.1.1.3, the site is not an important agricultural resource as interpreted by the LARA Model. Table 2, "LARA Model Factor Ratings," page T-2 of this analysis, summarizes the ratings that result from the LARA Model.

2.2. Guidelines for the Determination of Significance

The following significance guideline is the basis for evaluating impacts to important onsite agricultural resources in San Diego County. Direct impacts to agricultural resources are potentially significant when a project would result in the following:

The project site has important agricultural resources as defined by the LARA Model; and the project would result in the conversion of agricultural resources

that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of the site for agricultural use.

2.3. Analysis of Project Effects

The project was evaluated using the LARA Model, which examines the site in terms of both required and complementary factors. The LARA Model determined that the site is not an important agricultural resource, as detailed in Section 2.1.2 above. One required factor (soil) is rated low. Based on this determination, the site is not an important agricultural resource as interpreted by the LARA Model.

The project site includes approximately 0.8 acres (2 percent of the site) of Farmland of Statewide Importance Soils. The project will result in the conversion of approximately 0.2 acres of these soils for a building pad, as shown in Figure 7, "Soils Map," page F-7. The remaining 0.6 acres will be available for onsite agricultural operations. There are approximately 3.3 acres (nine percent of the site) of Prime Farmland onsite, one acre of which will be converted to a building pad and driveway. More than two acres will remain available for agricultural use. The project will not substantially impair the ongoing viability of the site for continued agricultural uses because the proposed lot areas encourage agricultural use

The surrounding area exhibits a pattern of successful small agricultural operations in combination with rural residential development. The median lot size of surrounding parcels with agricultural operations is approximately 4 acres; the median lot size of the project is also 4 acres, indicating that the probability is high that the proposed parcels will continue some type of agricultural use. According to the County of San Diego Department of Agriculture, Weights & Measures 2008 Crop Statistics and Annual Report, 63% of San Diego County farms are between one and nine acres, and the median farm size in San Diego County averages five acres.

The existing surrounding land uses are of similar size and scope as the proposed project. Based on the significance guidelines, impacts are not significant. The proposed project is not an important agricultural resource as defined by the LARA Model and the project will not substantially impair the ongoing viability of the site's agricultural use. San Diego County's LARA Model rates sites that are surrounded by agricultural lands, protected resource lands, and rural residential lands more highly than sites that are

surrounded by fewer of these types of land uses. This recognizes that a site surrounded by compatible surrounding land uses will more likely be viable for ongoing agricultural use due to lower likelihood of incompatible land use conflicts. The LARA Model also takes into account that farm size is not a useful measure of agricultural importance in San Diego County (Refer to page 19 of the County of San Diego Guidelines For Determining Significance for Agricultural Resources). The project is characteristic of this area because it proposes rural residential uses similar to existing surrounding uses.

2.4. Mitigation Measures and Design Considerations

The project has been designed with preservation of agricultural resources in mind. The General Plan and Zoning ordinances applicable to the site permit 19 dwelling units. Nine dwelling units are proposed (ten less than what is permitted) to reduce parcel yield in order to achieve agricultural viability onsite. Approximately 27 acres of the existing 38 acres of agricultural uses onsite (71 percent) will remain available for future agricultural operations.

2.5. Conclusions

Significance Guideline 2.2 recognizes that a project proposed on an important agricultural resource as defined by the LARA Model may not result in significant impacts to the resource if the project avoids the important soil resources (Prime and Statewide importance soils) on the project site or if the project would not substantially impair the ongoing viability of the site for agricultural use. The project has been designed to minimize impacts to future potential onsite agricultural uses by proposing minimum four-acre estate-sized lots. The proposed project, should lot owners decide to pursue agriculture, would not substantially impair the ongoing viability of the site for agricultural use because the project design encourages onsite agriculture.

Residential subdivisions that result in parcel sizes that could support agriculture and that substantially avoid the important physical soil resources onsite do not usually impair the viability of the resource, based on the prevalence of small farms in the County and high land prices that promote high value production on small parcels. Small farms in San Diego County typically support high value agriculture, and high land values make purchase of large farms financially prohibitive for most farmers. The proposed project creates smaller parcels that could be used to continue existing onsite agricultural operations, increasing the economic feasibility of the operation and ensuring the success of future agriculture on the site. In San Diego County, farming typically occurs among residential land uses. The creation of smaller, more affordable,

and viable agricultural parcels creates opportunities for farming when considering the cost of land in San Diego County and the fact that high value agriculture on small parcels is common here. Furthermore, 77 percent of farmers live on their farms and 90 percent of farms operate under full ownership versus operating as tenants or under leasehold (USDA NASS, 2002). These statistics support the rationale that residential subdivisions do not always constitute a significant adverse impact to agriculture if important soil resources are preserved and it can be demonstrated that farming would remain viable after development. The area surrounding the project site exhibits this pattern of successful agricultural production mixed with rural residential uses on small parcels, further supporting this rationale.

The significance level is "less than significant" because the LARA Model shows that the site is not an Important Agricultural Resource.

3. OFFSITE AGRICULTURAL RESOURCES

3.1. Guidelines for the Determination of Significance

The following significance guidelines are the basis for determining the significance of indirect impacts to offsite agricultural operations and Williamson Act Contract land in San Diego County:

a) The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act Contract (Contract) and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

b) The project proposes a school, church, day care or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Contract and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

c) The project would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Contract.

3.2. Analysis of Project Effects

A. Agricultural uses within a quarter mile of the site: Mixed rural residential and agricultural uses surround the site, most (67 percent of the total surrounding agricultural use) ranging in sizes of less than or equal to ten acres with a median lot size of 3.8 acres. The San Diego County Guidelines for Determining Significance states that if a residential subdivision consistent with existing densities in the surrounding area is proposed, the likelihood that the residential subdivision would constitute a significant indirect impact to agricultural resources is reduced based on the fact that similar land uses already exist in the area. The project will not have an indirect impact on surrounding agricultural operations for the following reasons:

1. Aqueduct Road separates the project site from agricultural uses to the west, and

Old Highway 395 and I-15 separate the site from agricultural uses to the east.

2. Estate-sized lots are proposed ranging in size from 4.0 acres to 4.6 acres, which is consistent with existing densities in the surrounding area. Large lots allow for an adequate separation of uses between lots so that indirect impacts will be minimized. For example, large lots allow for- the potential to continue future agricultural use, or employ extensive landscaping around pads, thereby providing a buffer between onsite residential uses and offsite agricultural uses.

B. Project proposes a use that involves a concentration of people (such as a school or church) and is within one mile of an agricultural operation or Williamson Contract land: The project does not propose a use of this type.

C. Project proposes other changes that could result in the conversion of agriculture: The project does not propose other changes that would result in the conversion of agricultural uses surrounding the site. The project encourages agricultural operations both onsite and offsite.

3.3. Mitigation Measures and Design Considerations

No potential indirect impacts to offsite agricultural operations would occur as a result of the project being located within a quarter mile of offsite agricultural operations. The project design will effectively buffer the residential uses from offsite areas. Therefore, no mitigation is required.

3.4. Conclusions

Offsite agricultural resources were assessed using aerial photographs and information gathered during site visits. The proposed project does not result in land use conflicts with agricultural lands in the vicinity because it is physically separated from existing agricultural uses and it proposes a project density that is consistent with existing densities in the area. It would not produce a concentration of people because it does not propose a use such as a church or school. Furthermore, the project does not propose other changes to the existing environment which could result in the conversion of offsite agricultural resources to a non-agricultural use. The proposed project is consistent with existing mixed-use residential and agricultural densities in the surrounding area; therefore, no significant indirect impacts will occur.

4. CONFORMANCE WITH AGRICULTURAL POLICIES

4.1. Applicable General and Community Plan Policies

4.1.1. San Diego County General Plan

4.1.1.1. General Plan

The project site is regionally categorized as Estate Development Area (EDA) and is designated as (19) Intensive Agriculture. The EDA Regional Category of the General Plan permits both agricultural and low density residential uses. Residential parcel sizes ranging from two to twenty acres or larger will be permitted depending on the slope.

The (19) designation promotes rural residential development and a variety of agricultural uses including minor commercial, industrial, and public facility uses appropriate to agricultural operations or supportive of the agricultural population. This designation permits two-, four-, and eight-acre parcels under specific conditions. Two acre minimum parcel sizes are allowed when the following findings are made: 1) At least 80 percent of the land of a proposed parcel does not exceed 25 percent slope, 2) The land is planted, and has been planted, for at least the previous one-year period, in one or more commercial crops that remain commercially viable on two-acre lots, 3) A continuing supply of irrigation water is available to the land, 4) The land has access to a publicly maintained road without the necessity of a significant amount of grading, and 5) Two-acre parcels on the land will not have a significant adverse environmental impact which cannot be mitigated. Although the findings have all been met by the proposed project for two-acre parcels, larger four-acre minimum lots are being proposed to maintain densities similar to surrounding properties and to preserve physical separation between the project and surrounding areas.

4.1.1.2. Bonsall Community Plan

The Bonsall Community Plan of the County of San Diego General Plan applies to the proposed project. This Community Plan seeks to "preserve and enhance the rural character of Bonsall through the protection of agriculture, estate lots, ridgelines, and the community's natural resources." The Plan encourages residential development that is consistent with the community's rural character and its natural resources. Its agricultural goal seeks to "Protect and encourage existing and future agriculture/horticulture as a prominent land use throughout

the Bonsall area." Policies and Recommendations of the Agricultural Goal that pertain to the project include the following: 1) Properties that are in agricultural use and are being proposed for development with estate sized lots, should be encouraged to retain agriculture as a compatible use, 4) Agricultural use and land suitable for agricultural usage should be protected from land uses which may be incompatible with agriculture, and 5) Agricultural uses should be unobtrusive and compatible with the surrounding neighborhood and the rural community character.

4.1.2. San Diego County Zoning Ordinance

The site is zoned A70 Limited Agricultural Use Regulations, which are intended to create and preserve areas intended primarily for agricultural crop production. Residential uses are a permitted use in this zone. Additionally, a limited number of small farm animals may be kept and agricultural products raised on the premises may be processed.

4.1.3. County Board of Supervisors Policy I-38

The County Board of Supervisors Policy I-38 sets forth policies for the implementation of the Williamson Act, which are summarized in Section 1.4.2.6. This Policy establishes the criteria for formation of preserves within the County of San Diego, including required hearings, minimum lot size, zoning, and eligible ownership.

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

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

4.2. Project Consistency with Applicable Policies

The project is consistent with the San Diego County General Plan, the Bonsall Community Plan, and other agricultural policies and ordinances pertinent to the project.

4.2.1. San Diego County General Plan

4.2.1.1. General Plan

The project site is regionally categorized as Estate Development Area (EDA) and is designated as (19) Intensive Agriculture. The minimum proposed parcel size of four acres is allowed under the EDA category because the slope criteria of the (19) Intensive Agriculture designation is met. None of the proposed parcels have average slopes greater than 25 percent. The site has been planted with a variety of commercial crops for many years, and surrounding parcels relative to the proposed project prove that these uses are able to remain viable on two-acre parcels. A continual supply of irrigation water is available to the project site through the existing connection to the Rainbow Municipal Water District. Old Highway 395 will be used to access the site. Therefore, the project is consistent with the San Diego County General Plan designation that is applicable to the site.

4.2.1.2. Bonsall Community Plan

The project preserves and enhances the rural character of Bonsall by proposing estate sized lots from 4.0 to 4.6 acres each. Lot sizes are consistent with those of neighboring mixed-use residential and agricultural properties, many with successfully implemented agricultural operations on small lots. The average parcel size onsite is 4.2, which is consistent with the existing mixed agricultural and residential development in the surrounding area with a median lot size of 4.0 acres. The Bonsall Community Plan encourages residential development that is consistent with the community's rural character. The proposed project is compatible with the surrounding neighborhood and complements the rural community character of Bonsall because its estate-sized lots are a common land use pattern in the area. The project also enhances and preserves Bonsall's rural character because there are no ridgelines on the site. Therefore, the project is consistent with the Bonsall Community Plan.

4.2.2. San Diego County Zoning Ordinance

The project proposes nine residential dwelling units, ten less than that permitted in the A70 zone. The project conforms to the San Diego County Zoning Ordinance A70 zone by proposing rural residential use on estate-sized parcels which could support a variety of agricultural uses.

4.2.3. County Board of Supervisors Policy I-38

The project site is not under an existing Williamson Act contract, therefore Policy I-38 is not applicable to the proposed project and no inconsistency with this policy is identified.

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

The Agricultural Enterprises and Consumer Information Ordinance of the San Diego County Code of Regulatory Ordinances (§63.401 et seq.) is intended to define and limit the circumstances under which agricultural enterprise activities, operations, and facilities shall constitute a nuisance. Existing agricultural land use in the vicinity will not be deemed a nuisance as a result of the proposed project since the project will be buffered from these uses by existing roads that separate offsite agricultural uses from the proposed rural residential use. Other residences located in the vicinity of the proposed project are similar in size and scope with viable agricultural operations onsite. Therefore, the project is consistent with this ordinance.

4.3. Conclusions

The project will not conflict with zoning or land use designations because the project is consistent with its existing zoning and designations and no changes are proposed to existing zoning or designations. With estate-sized parcels being proposed, and only pads and driveways graded, the rural and agricultural character of the Bonsall area will be retained by the project. There are no changes in land uses being proposed that would conflict with existing agricultural operations in the vicinity because the project is buffered from existing agricultural use in the area.

5. CUMULATIVE IMPACT ANALYSIS

Cumulative impacts are those caused by the additive effects of other projects to agricultural resources over time. A project's impact may not be individually significant, but the additive effect when viewed in connection with the impacts of past, present, and probable future projects may cause the significant loss or degradation of agricultural resources.

5.1. Guidelines for the Determination of Significance

The guidelines for determining the significance of cumulative impacts are based on the same guidelines used to determine the significance of project level impacts (Sections 2.2 and 3.1), with the exception that the analysis considers the significance of the cumulative impact of the individual project in combination with the impacts caused by other projects in the cumulative study area.

5.2. Analysis of Project Effects

The cumulative projects study area consists of approximately 3,200 acres extending over a five mile area and was chosen based on a combination of topography, adjacency to Interstate 15, and its location within the Bonsall Community Planning Area that encompasses this cumulative study area. Surrounding projects are shown in Figure 12, "Cumulative Projects on FMMP Soils Map," page F-12. These projects are labeled with their project number and are designated by blue dots. Prime Farmland and/or Farmland of Statewide Importance are shown as red areas on the map. Projects on Prime Farmland and/or Farmland of Statewide Importance and those with existing agricultural uses are listed in Table 3, "Cumulative Project List," on page T-3.

5.2.1. Projects That Would Not Substantially Impair Ongoing Viability of Agriculture

The County currently performs many agricultural analyses "in house". The projects as reviewed by county staff that would not substantially impair the ongoing viability of agricultural use for their permits are summarized in Table 4, "Cumulative Projects That Do Not Substantially Impair Viability of Surrounding Agriculture," page T-4. These projects may or may not have existing agriculture and/or Prime or Statewide Importance soils onsite. Examples of these projects include minor expansions or alterations of an existing use, single family residence grading permits, boundary adjustments and Certificates of Compliance, agricultural intensification, accessory or auxiliary uses such as wireless telecommunication facilities and drainage facilities, road improvements and other minor public facility

improvements, and any project, including residential subdivisions, that would substantially avoid impacts to Prime and Statewide Importance soils while maintaining agricultural viability. Projects that have been withdrawn are also included in this list of projects.

TM 5079, the San Luis Rey Ranch project, was eliminated from the cumulative list since it was subdivided in November 1995, fifteen years ago, and is now classified as an urban or built-up area on the FMMP Map. Major Use Permits (MUPs) 70-139, 03-113, 99-021, 01-048, 02-022, 03-097, 04-035, and 06-090 are all wireless facilities that would not substantially impair the ongoing viability of the surrounding sites for agricultural use because they are accessory uses. Administrative Permits 07-010 (oversize barn) and 02-042 do not have existing agricultural activities onsite, contain no soils of importance, and are minor expansions of an existing use. Permit numbers 98-0206, 05-0019, 99-0105, 05-0087, 01-0056, and 98-0049 are boundary adjustments that would not substantially impair the ongoing viability of the surrounding sites for agricultural use. Major Use Permit (MUP) 04-016 is an expansion of the existing Dai Dang Meditation Center. There are no existing agricultural uses or soils of importance on the site. Minor Use Permit 04-019 is a minor expansion of an existing use consisting of a second dwelling unit with no existing agricultural uses or soils of importance onsite. MUPs 70-212-02 and 92-019-02 are minor alterations of an existing use that would not substantially impair the ongoing viability of the surrounding sites for agricultural use. Tentative Parcel Map (TPM) 20619, Administrative Permit 05-038, and MUP 05-055 have all been withdrawn. Projects that would not substantially impair the ongoing viability of agriculture are listed in Table 4, "Cumulative Projects That Do Not Substantially Impair Viability of Surrounding Agriculture," page T-4 of this analysis.

5.2.2. Projects Analyzed With Existing Agriculture Or Prime Or Statewide Importance Soils Onsite

Twelve projects were analyzed for cumulative direct impacts to agricultural resources. The Bonsall Community Plan area is primarily an agricultural community. Projects in the vicinity appear to be mostly rural residential developments retaining the majority of existing groves, thereby resulting in a significant area of groves being retained for continued production. Table 3, "Cumulative Project List," on page T-3, shows the estimated impacts to Prime

Farmland, Farmland of Statewide Importance, and existing agriculture from projects in the cumulative analysis area.

Potential impacts from new lots have been estimated as one acre per lot when information on actual potential impacts is unavailable or not found in the County files. This takes into account the graded pad and roads necessary for one single-family dwelling unit. According to the Agricultural Guidelines, if information is not available for a cumulative projects' potential impacts, they are to be estimated[2].

MUP 72-618, the Rawhide Ranch, is for one building (approximately 750 square feet in size) on a 37-acre ranch which may impact less than an acre of Farmland of Statewide Importance. This resource is located toward the east boundary, in the central area of the parcel. No indirect impacts are anticipated because there is no active agriculture onsite.

Tentative Map (TM) 5410, The Marquart Ranch, has been approved for a 44-acre subdivision and is located approximately 1.5 miles from the project site, east of Interstate 15. This project does not have Prime Farmland and/or Farmland of Statewide Importance onsite, however, it does have an existing avocado grove. There are no cumulative indirect agricultural impacts and minimal direct impacts (an estimated ten acres of grove) identified as a result of the Marquart Ranch project.

TM 5276, West Lilac Farms, proposes to subdivide 92.8 acres into 28 residential parcels measuring between 2.1 and 5.9 acres each. It currently supports active citrus and avocado groves and cut flowers. The proposed parcel sizes are adequate to support continuing agricultural uses on the site. Approximately 22.6 acres of existing agriculture will be preserved in a Limited Building Zone easement. Existing agriculture outside the LBZ that is not directly impacted by the project may continue on each lot, at the new property owner's discretion. The project will directly impact an estimated six acres of agricultural resources on Prime Farmland and Farmland of Statewide Importance on the site. No indirect impacts are anticipated because it is similar to existing residential/agricultural use in the area where these uses co-exist.

MUP 94-025 is a 28-acre parcel proposing a five-acre retreat within an undeveloped area of an existing grove. The grove remains intact and the retreat will not be

[2] Agricultural Resources Report Format and Content Requirements, Table XX. Cumulative Project List, page 19.

located on important farmland. No direct or indirect impacts are anticipated because the grove will be retained and the project is consistent with agricultural and residential mixed uses in the surrounding area.

TPM 20763 is a minor subdivision approved in June of 2004, dividing one parcel of approximately 4.8 acres into two lots; one 2.42 acres and the other 2.37 acres. Active agriculture onsite consists of deciduous fruits and nuts. This project directly impacts approximately two acres of existing agriculture on the site, one acre of which is Unique Farmland. No potential indirect impacts are expected because orchards and vineyards remain viable and the project is consistent with agricultural and residential mixed uses in the surrounding area.

TPM 20830 is a subdivision of 30 acres into four lots plus a remainder lot. There is an existing avocado orchard onsite (approximately 13 acres) and it is estimated that approximately three acres of avocados will be directly impacted by the project. It is expected that the orchard will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area. Attachment F of this analysis contains relevant pages from the project's adopted Mitigated Negative Declaration and CEQA Initial Study.

TPM 20799 is a subdivision of 11.7 acres into four parcels in an existing avocado and citrus grove. A minimum of two acres of grove will remain on each parcel. Less than two acres of the existing grove will be directly impacted by the project. There is no Prime Farmland or Farmland of Statewide Importance on the site. It is expected that the orchard will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area. Attachment F of this analysis contains relevant pages from the project's accepted Agricultural Analysis.

TPM 20319 proposes to subdivide 17 acres into four lots and a remainder parcel. There is an existing avocado grove on the site. There are no significant direct or indirect impacts anticipated by the project because the project is consistent with agricultural and residential mixed uses in the surrounding area. Estimated impacts for residences are approximately one acre per lot, as explained above on page 5-3 of this section.

TPM 20541 is a subdivision of 12.5 acres into four lots plus one remainder parcel. An existing avocado grove will be directly impacted. Approximately 150 trees total will be removed as a result of the project, leaving about 200 trees per lot. There is no Prime Farmland or Farmland of Statewide Importance on the site. It is expected that the grove will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area.

TM 5492, Brisa del Mar, proposes a residential subdivision of 206 acres into 27 two-acre minimum lots. Two residences and a developed horse arena currently exist on the site. Most of the site is undeveloped. The area south of the horse arena and north of Camino del Rey Road is classified as Farmland of Local Importance and is proposed as dedicated open space. There is no active agriculture and no soils of importance on the site.

TPM 20845 has been approved for the subdivision of 14.77 acres into four lots and a remainder parcel. This project could directly impact approximately nine acres of greenhouse and/or truck crops on the site, 2.5 acres of which are Unique Farmland. There is no Prime Farmland or Farmland of Statewide Importance on the site.

TPM 20727 is a subdivision of 11.8 acres into two lots. The majority of the site consists of citrus and avocado grove, approximately two acres of which will be directly impacted. There is no Prime Farmland or Farmland of Statewide Importance on the site. This project was reviewed by County staff and was determined to not have significant adverse project or cumulative impacts. It is expected that the groves will remain viable and no indirect impacts are anticipated because the project is consistent with agricultural and residential mixed uses in the surrounding area. Attachment F of this analysis contains relevant pages from the project's adopted Mitigated Negative Declaration and CEQA Initial Study.

Under the County Guidelines for Determining Significance of Agricultural Resources, a significant direct impact to agricultural resources occurs if a project results in the conversion of agricultural resources that meet soil quality criteria for Prime Farmland or Farmland of Statewide Importance and as a result a project would substantially impair the ongoing viability of the site for agricultural use. Nine of the twelve projects studied in the cumulative project analysis do not result in impacts to Prime Farmland or Farmland of Statewide Importance. The Rawhide Ranch project (MUP 72-618) results in an impact to less than one acre of Prime Farmland or

Farmland of Statewide Importance, the West Lilac project (TM 5276) results in an impact of six acres, and the McNultly project (TPM 20763) impacts less than one acre. The project has direct impacts to less than two acres of important soils. Collectively, the project in combination with other anticipated development in the area results in the total loss of approximately ten acres of Prime Farmland or Farmland of Statewide Importance within the 3,200-acre area that was studied. This includes 787 acres of Prime Farmland or Farmland of Statewide Importance. This represents approximately 1.2 percent of important farmland within the study area. This is not a cumulatively significant direct impact to agricultural resources, since 777 acres (98.7%) of Prime Farmland or Farmland of Statewide Importance remain within the study area. The project, in combination with other anticipated development in the study area, does not result in any cumulatively significant agricultural impacts because the cumulative projects have avoided or minimized agricultural impacts or retained agricultural uses

Regionally, the loss of 10 acres of Prime Farmland and/or Farmland of Statewide Importance or 72 acres of land where agricultural activity occurs within the 3,200-acre study area is not significant. The proposed project's estate-sized lots allow for continued agricultural operations onsite. The 2008 San Diego County Crop Report indicates that 313,000 acres of land within San Diego County remained in agricultural operations as of 2008, an increase of 15.2 percent over 2007. The 2008 report documents continued successful agricultural production in San Diego County on small lots ranging in size from one to nine acres. Regionally, the project will not result in cumulatively significant agricultural impacts.

There are no Contract lands in the vicinity and no projects involving a concentration of people such as a school, church, or day care, that could result in conversion of agricultural resources to a non-agricultural use. A significant amount of land will remain available for agricultural use. Density is not increased above designated General Plan and zoning limits but rather is decreased. None of the projects analyzed were shown to have significant indirect impacts to agricultural resources in the study area because they fit the model of small viable agricultural use farms in San Diego County. Cumulative impacts are not significant.

5.3. Mitigation Measures and Design Considerations

Cumulative impacts are not significant and therefore no mitigation measures will be necessary.

5.4. Conclusions

Past, present, and probable future projects in the vicinity of Dabbs were analyzed for their potential cumulative impacts to agriculture. Projects analyzed for cumulative impacts will directly affect an estimated 72 acres of land under agricultural use, including Prime Farmland, Farmland of Statewide Importance, and any agricultural resource within the study area. Approximately ten acres of the total 72 acres is on Prime Farmland and Farmland of Statewide Importance soils. This makes up approximately 1.2 percent of the total Prime Farmland and Farmland of Statewide Importance that is currently contained within the cumulative study area. It is estimated that nine percent of the total cumulative study area of approximately 3,200 acres is Prime Farmland and Farmland of Statewide Importance. Agricultural acreage in San Diego County continues to increase despite the loss of important farmland in specific regions of the county. Therefore, the loss of ten acres of Prime Farmland and Farmland of Statewide Importance or 72 acres of agriculture overall, is not cumulatively significant. Over 98 percent of the total Prime Farmland and Farmland of Statewide Importance will remain available for agricultural use and agricultural acreage continues to expand in San Diego County. Cumulative impacts are not significant because their loss does not affect the viability of agricultural production in the county.

Cumulative projects are generally two acres or more in size which is important for continued agriculture because it allows for residential uses while retaining agricultural uses. Approximately 73 percent of the existing agricultural operations are preserved on cumulative project sites. Cumulative projects will not result in incompatible development that would increase agricultural interface conflicts and associated agricultural viability because they are consistent with the small viable farm model that is common in San Diego County.

Other projects in the area that were analyzed do not contribute significant direct or indirect impacts to agricultural resources. Furthermore, land use intensity is not increased and agricultural operations will continue in an agriculturally-dominated area. There are no significant potential cumulative impacts based on the list of projects in the vicinity, therefore, impacts are less than significant.

6. SUMMARY OF PROJECT IMPACTS AND MITIGATION

The project was analyzed by a consultant from the County of San Diego's qualified consultant list for agricultural studies. The project proposes the development of nine residential lots on the 38.4-acre site, a number that is ten residential lots less than permitted by the existing County General Plan and Zoning Ordinance. The project is consistent with the County General Plan, the County Zoning Ordinance and the Bonsall Community Plan and meets all of the agricultural goals and policies prescribed in the Bonsall Community Plan. Of the 38 acres of agricultural uses existing onsite, seven acres will be impacted by the project. The project does not result in significant agricultural impacts and no mitigation is required. The project has been designed to promote agricultural uses onsite by proposing estate-sized lots of at least four acres each.

The project is not a significant agricultural resource according to the LARA Model. Proposed parcel sizes ranging from 4.1 to 4.6 acres are adequate to support agricultural operations onsite. These parcel sizes are compatible with the mixed-use residential and agricultural uses that surround the project, which exhibit a pattern of successful agricultural operations on small parcels. The proposed project is consistent with General Plan and zoning designations, and is compatible with the rural residential and agricultural policies of the Bonsall Community Plan.

No significant cumulative impacts will result from the proposed project in combination with other planned development in the 3,200-acre study area. Planned projects throughout the area either preserve existing agricultural uses or propose parcel sizes that ensure the continuing viability of agricultural uses. The proposed project does not result in significant agricultural impacts individually or cumulatively and no mitigation is required.

Overall loss of agricultural and grazing land is 72 acres out of approximately 3,200 acres studied. The potential loss of agricultural land was also examined on a regional basis based upon the 2008 County of San Diego Crop Statistics and Annual Report. Given the increase of 140,504 acres (81 percent) of land in agricultural production in the County in 2008, the loss of 10 acres of Prime Farmland or Farmland of Statewide Importance is not cumulatively significant and no mitigation is required.

No indirect cumulative agricultural impacts will occur from the project or the project in combination with other anticipated development in the study area since most of the projects retain agricultural uses onsite and have been designed to be compatible with the mixed agricultural and rural residential uses in the surrounding area. Therefore, no cumulatively significant indirect impacts to agricultural operations in the area will occur.

7. REFERENCES

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

1973 Soil Survey, San Diego, California

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

8. LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

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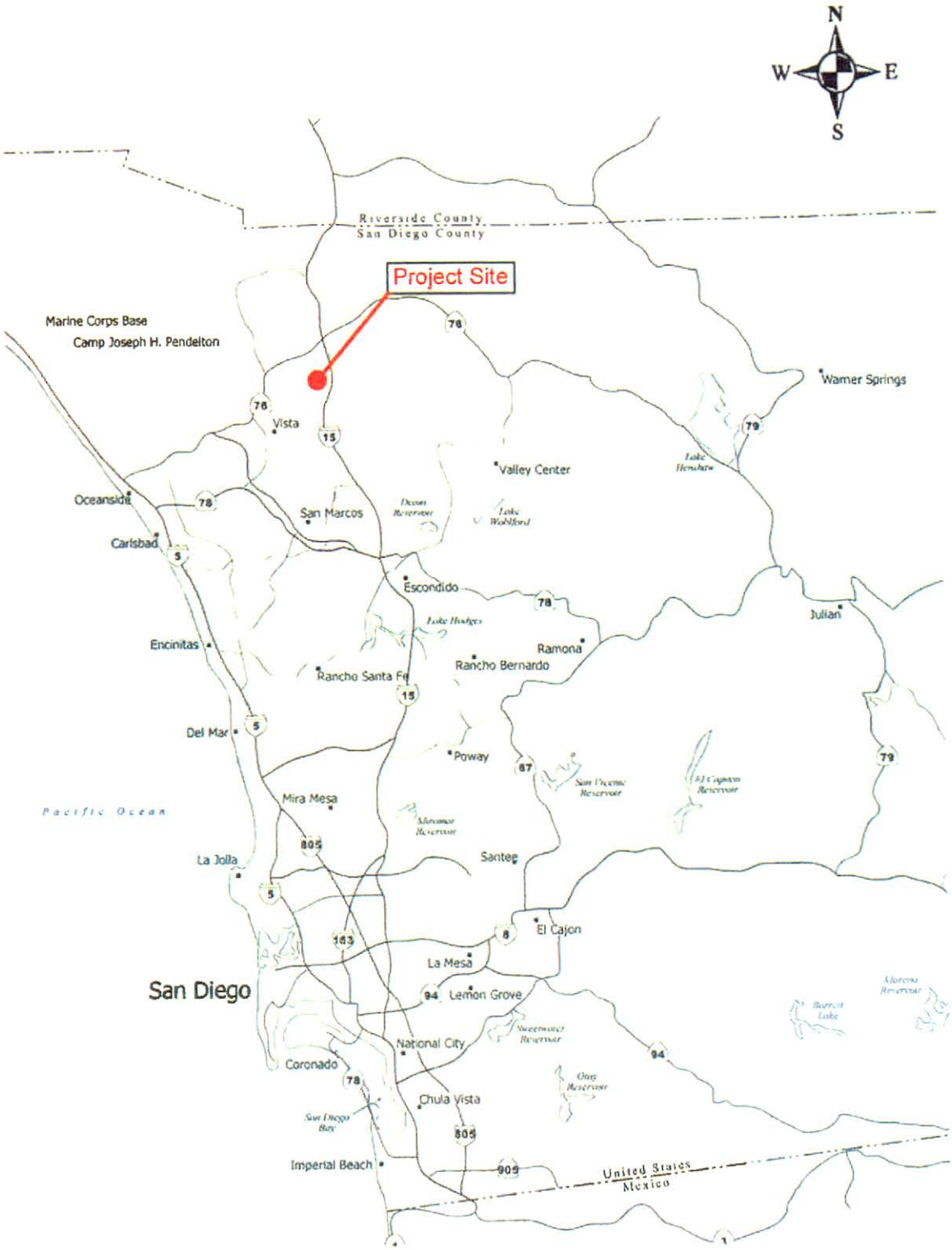
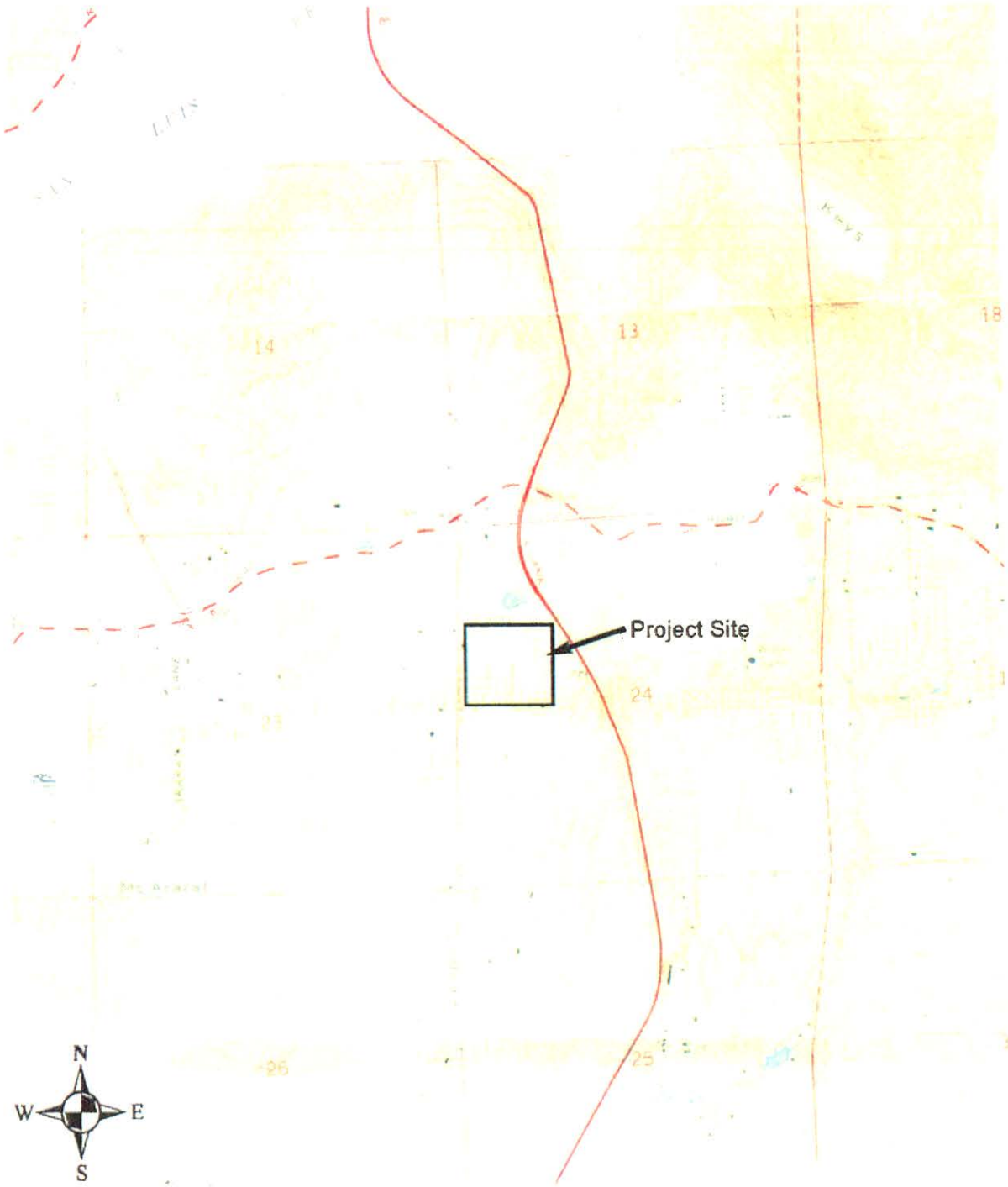
Figures



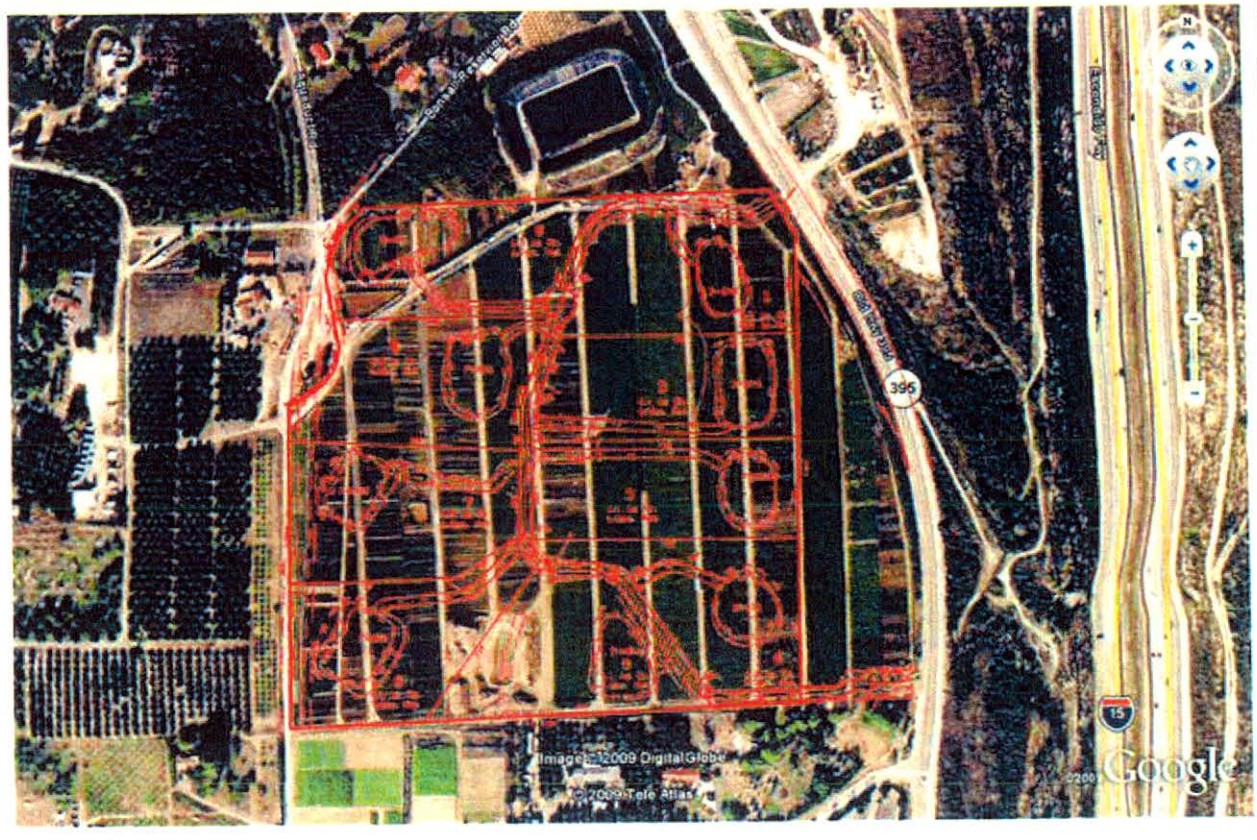
TRS CONSULTANTS	TM 5346 Regional Vicinity Map	Figure 1



TRS CONSULTANTS

TM 5346
USGS Bonsall Quadrangle 7.5' Map

Figure 2



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TM 5346
Plot Plan on Aerial Photograph

Figure 3

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TM 5346
Regional Aerial Photograph

Figure 4

PRIME FARMLAND

LAND WITH THE BEST COMBINATION OF PHYSICAL AND CHEMICAL CHARACTERISTICS ABLE TO SUSTAIN LONG TERM PRODUCTION OF AGRICULTURAL CROPS. THIS LAND MUST HAVE BEEN USED FOR PRODUCTION OF IRRIGATED CROPS AT SOME TIME DURING THE FOUR YEARS PRIOR TO THE MAPPING DATE

FARMLAND OF STATEWIDE IMPORTANCE

LAND WITH A GOOD COMBINATION OF PHYSICAL AND CHEMICAL CHARACTERISTICS FOR AGRICULTURAL PRODUCTION. HAVING ONLY MINOR SHORTCOMINGS, SUCH AS LESS ABILITY TO STORE SOIL MOISTURE, COMPARED TO PRIME FARMLAND. THIS LAND MUST HAVE BEEN USED FOR PRODUCTION OF IRRIGATED CROPS AT SOME TIME DURING THE FOUR YEARS PRIOR TO THE MAPPING DATE.

UNIQUE FARMLAND

LAND USED FOR PRODUCTION OF THE STATE'S MAJOR CROPS ON SOILS NOT QUALIFYING FOR PRIME OR STATEWIDE IMPORTANCE. THIS LAND IS USUALLY IRRIGATED, BUT MAY INCLUDE NONIRRIGATED FRUITS AND VEGETABLES AS FOUND IN SOME CLIMATIC ZONES IN CALIFORNIA.

FARMLAND OF LOCAL IMPORTANCE

LAND THAT MEETS ALL THE CHARACTERISTICS OF PRIME AND STATEWIDE, WITH THE EXCEPTION OF IRRIGATION.
FARMLANDS NOT COVERED BY THE ABOVE CATEGORIES BUT ARE OF SIGNIFICANT ECONOMIC IMPORTANCE TO THE COUNTY. THEY HAVE A HISTORY OF GOOD PRODUCTION FOR LOCALLY ADAPTED CROPS. THE SOILS ARE GROUPED IN TYPES THAT ARE SUITABLE FOR TRUCK CROPS (SUCH AS TOMATOES, STRAWBERRIES, CUCUMBERS, POTATOES, CELERY, SQUASH, ROMAINE LETTUCE, AND CAULIFLOWER) AND SOILS SUITED FOR ORCHARD CROPS (AVOCADOS AND CITRUS).

GRAZING LAND

LAND ON WHICH THE EXISTING VEGETATION IS SUITABLE FOR GRAZING OF LIVESTOCK. THE MINIMUM MAPPING UNIT FOR THIS CATEGORY IS 40 ACRES

URBAN AND BUILT-UP LAND

RESIDENTIAL LAND WITH A DENSITY OF AT LEAST SIX UNITS PER TEN-ACRE PARCEL, AS WELL AS LAND USED FOR INDUSTRIAL AND COMMERCIAL PURPOSES, GOLF COURSES, LANDFILLS, AIRPORTS, SEWAGE TREATMENT, AND WATER CONTROL STRUCTURES.

OTHER LAND

LAND WHICH DOES NOT MEET THE CRITERIA OF ANY OTHER CATEGORY. COMMON EXAMPLES INCLUDE LOW-DENSITY RURAL DEVELOPMENTS, WETLANDS, DENSE BRUSH AND TIMBERLANDS, GRAVEL PITS, AND SMALL WATER BODIES

WATER

PERENNIAL WATER BODIES WITH AN EXTENT OF AT LEAST 40 ACRES

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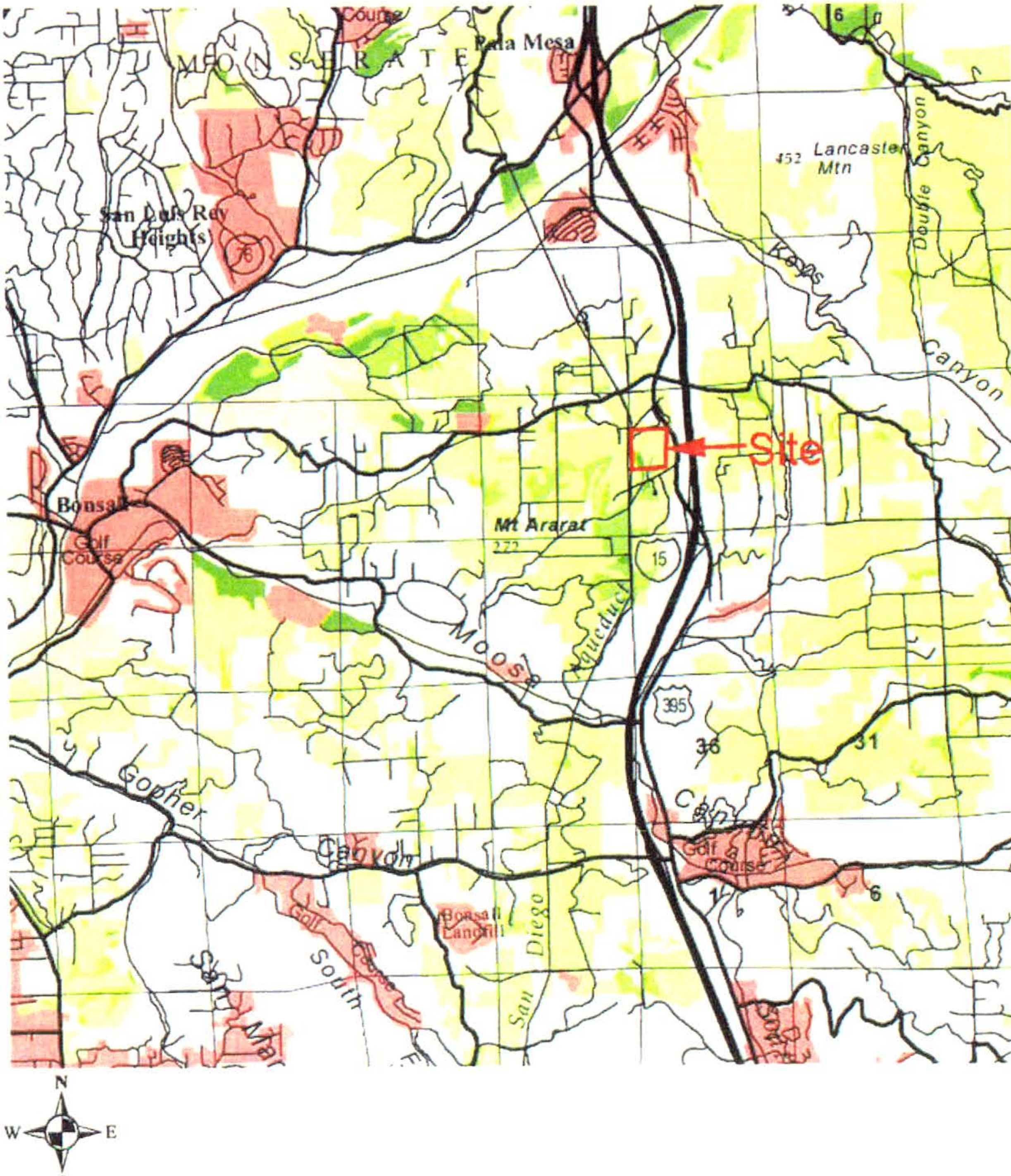
TM 5346
Farmland Mapping & Monitoring Program (FMMP) Map Legend

Figure 5



TM 5346
Regional FMMP Map

Figure 6

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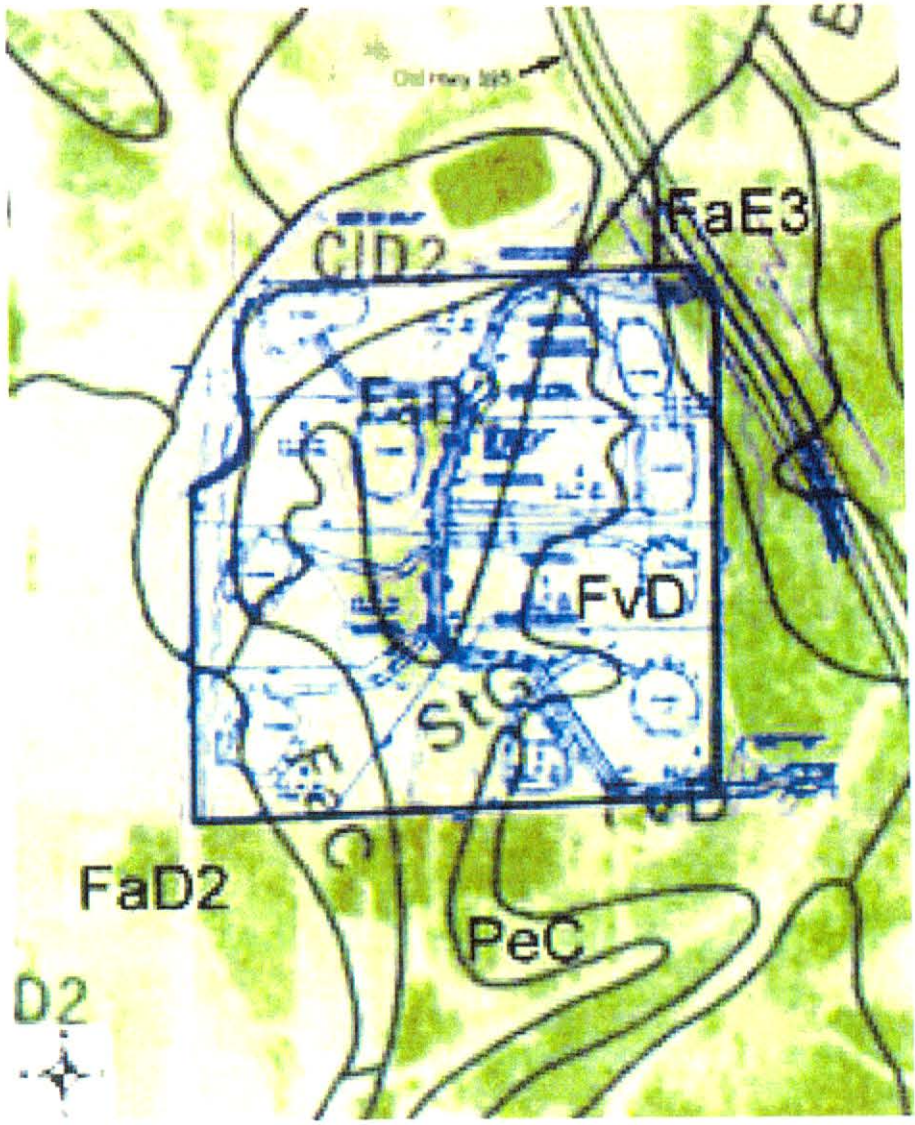

ClD2 (Cieneba coarse sandy loam, 5-15% slopes, eroded)	4.6 acres
FaC (Fallbrook sandy loam, 5-9% slopes)	3.3 acres
FaD2 (Fallbrook sandy loam, 9-15% slopes, eroded)	11.5 acres
FaE3 (Fallbrook sandy loam, 9-30% slopes, severely eroded)	0.9 acres
FvD (Fallbrook-Vista sandy loams, 9-15% slopes)	10.5 acres
PeC (Placentia sandy loam, 2-9% slopes)	0.8 acres
StG (Steep gullied land)	6.8 acres

Total 38.4 acres

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TM 5346
Soils Map

Figure 7

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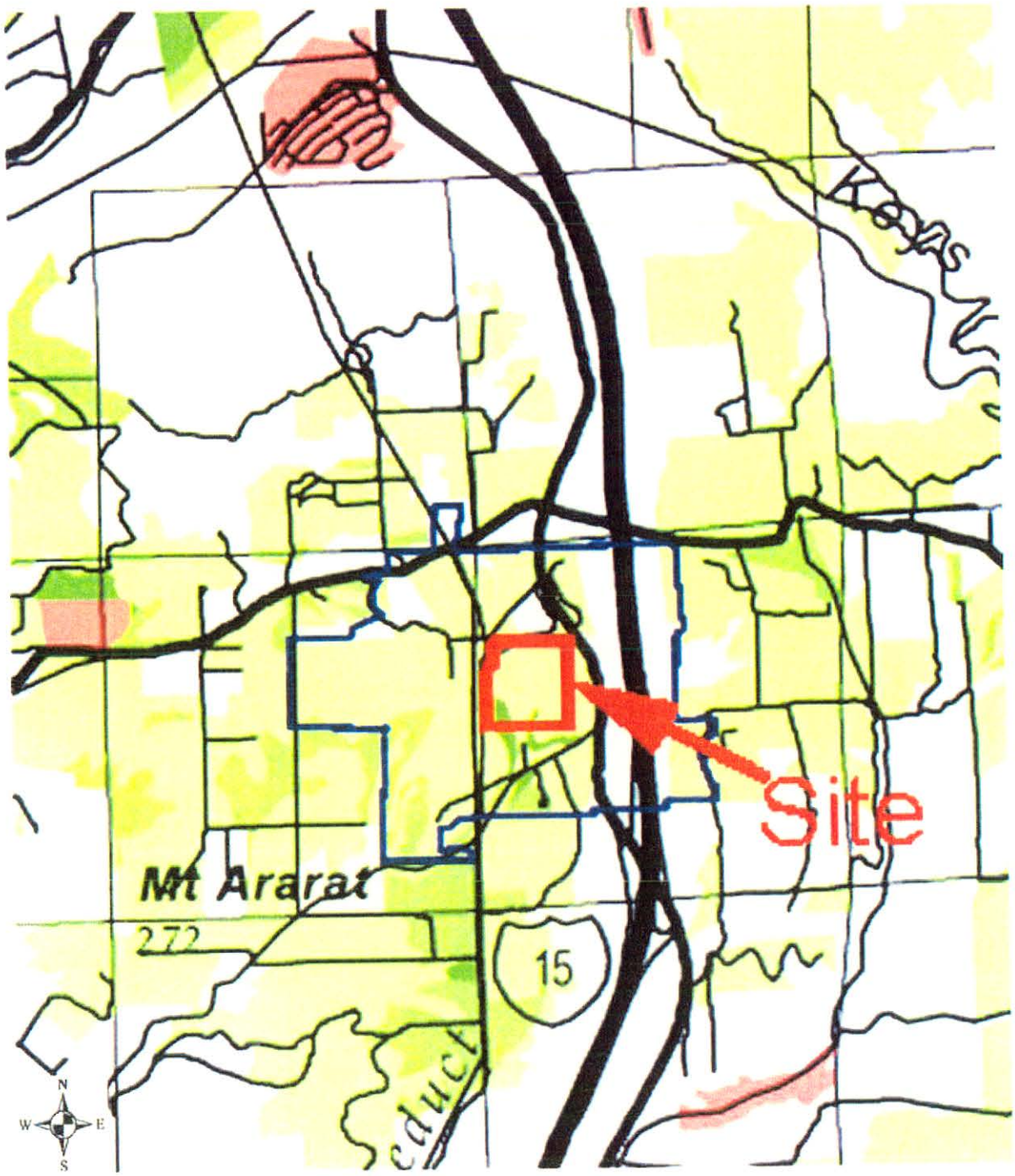
TM 5346
Site on FMMP Map

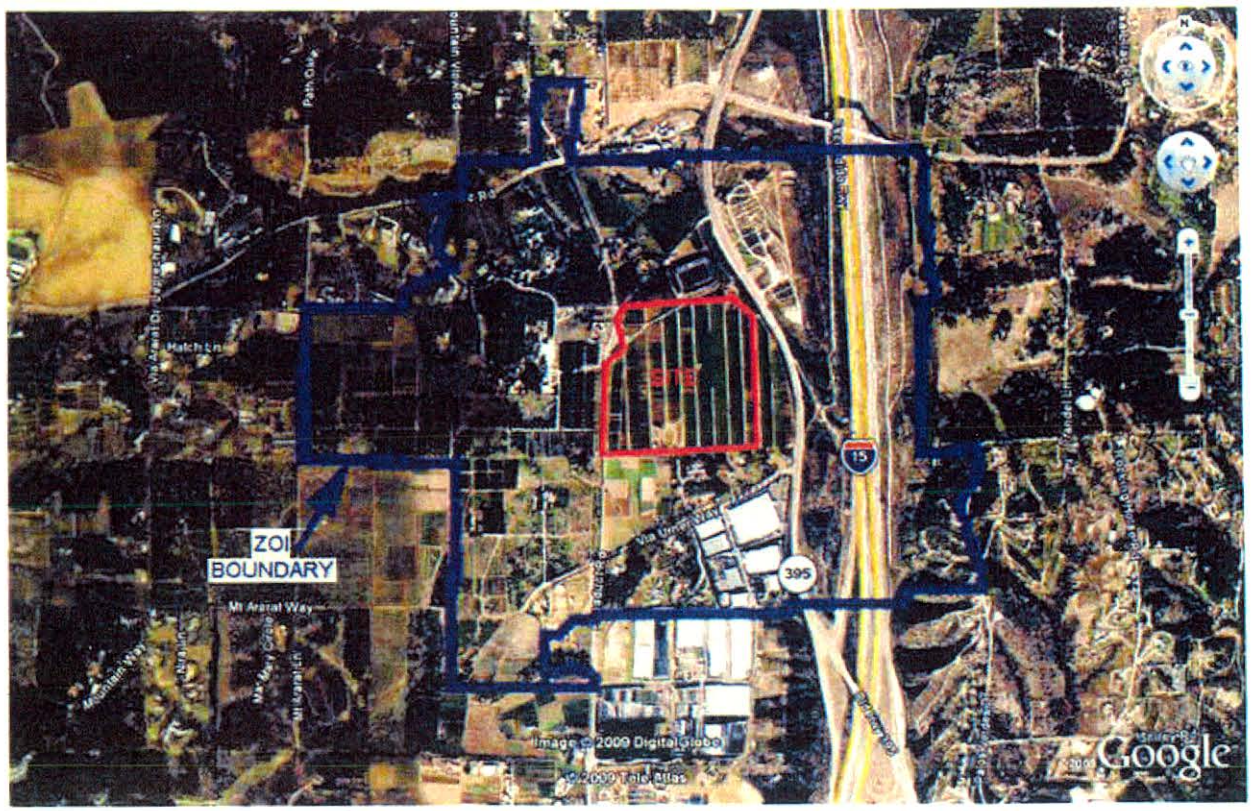
Figure 8



TRS CONSULTANTS

TM 5346
ZOI on FMMP Map

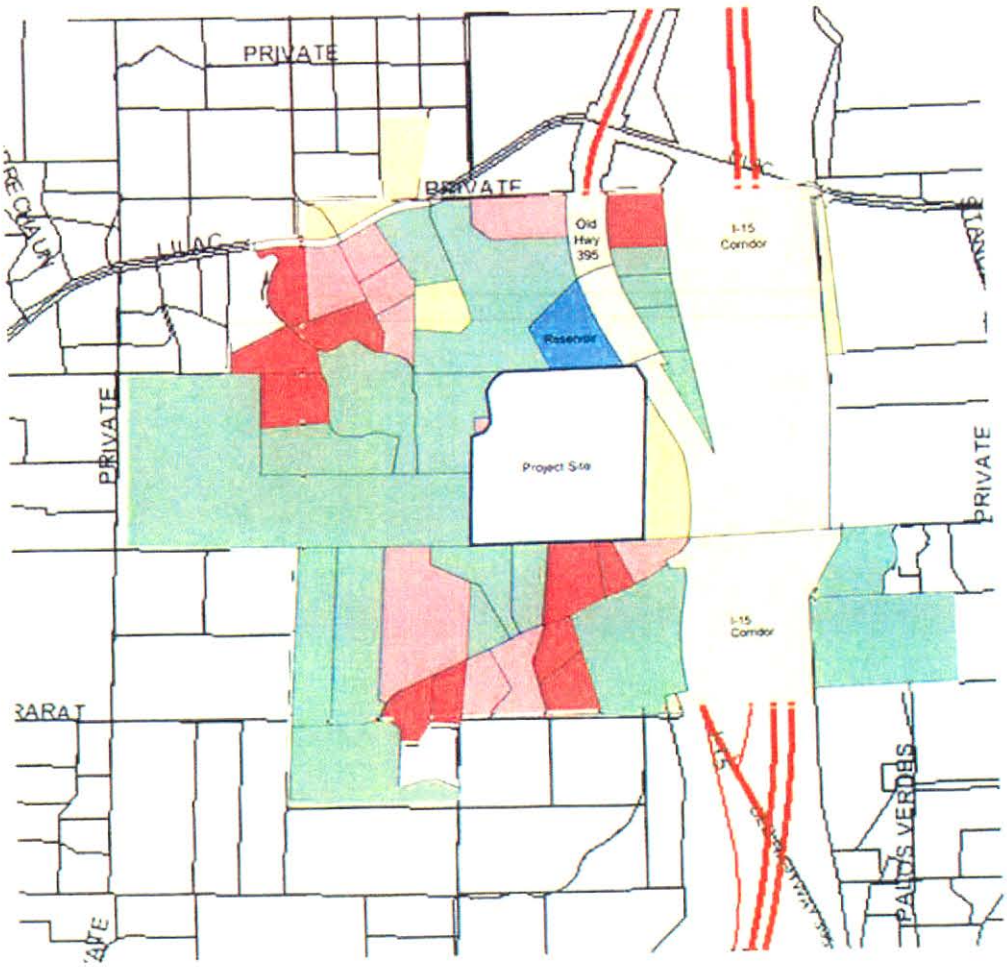
Figure 9



TRS CONSULTANTS

TM 5346
ZOI on Aerial Photograph

Figure 10



	Agricultural		Reservoir
41.86 Acres	Residential		Quarter Mile Zone of Influence (ZOI) Boundary
20.87 Acres	Undeveloped		Site Boundary
38.51 Acres	Residential Parcels <5 Acres with agricultural component	~110 Acres	Developed

Total ZOI Area: 418.66 Acres

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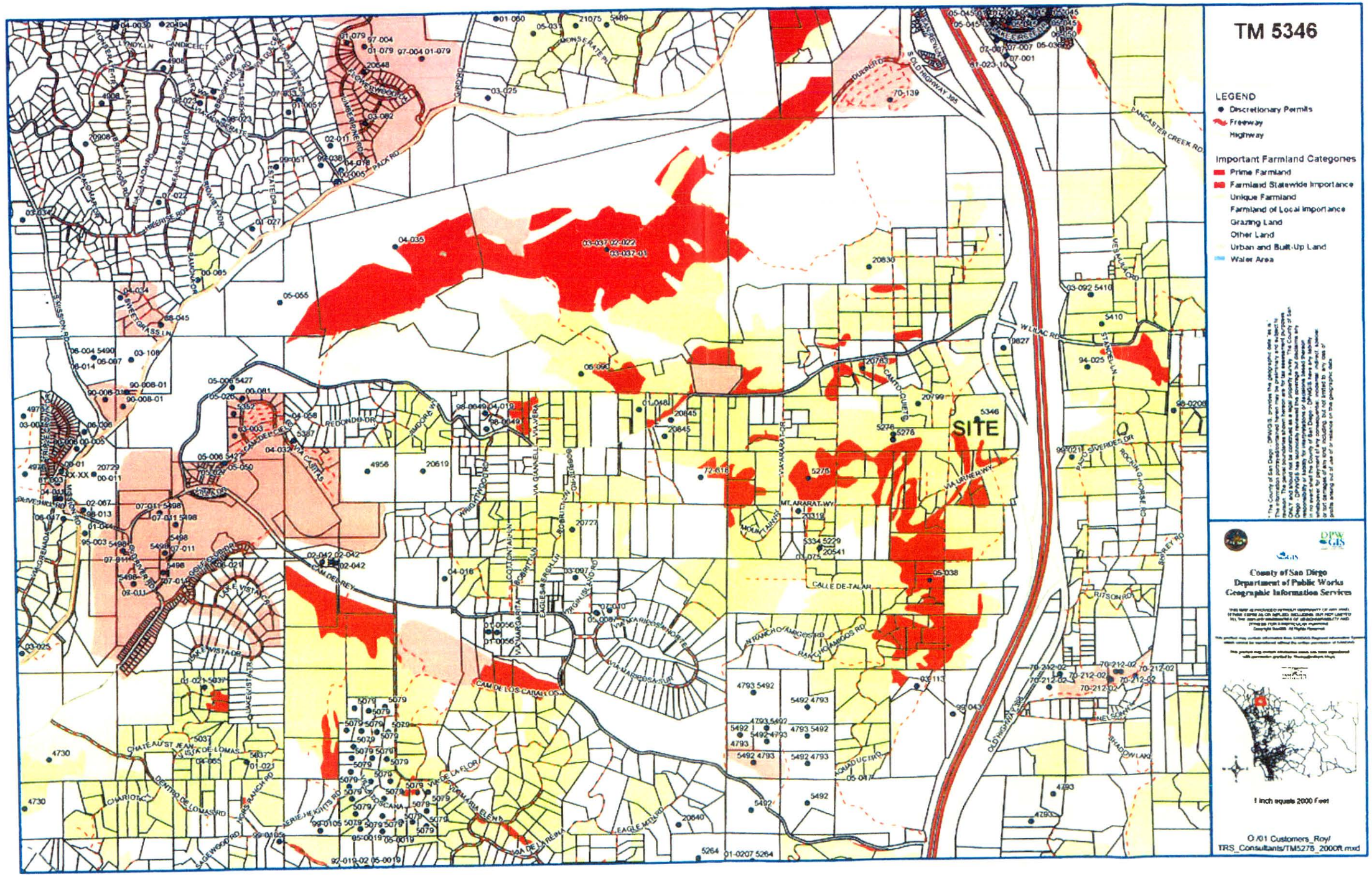
TM 5346
ZOI Parcel Sizes

Figure 11



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TM 5346
Cumulative Projects on FMMP Soils Map

Figure 12

Tables

Soil Quality Matrix

	Column A	Column B	Column C	Column D	Column E	Column F	Column G
	Soil Type	Size of project site (acreage)	Unavailable for agricultural use	Available for agricultural use	Proportion of project site	Is soil candidate for prime farmland or farmland of statewide significance? (Yes=1, No=0)	Multiply Column E x Column F
Row 1	ClD2	4.6	2.4	2.2	0.07	0	0
Row 2	FaC	3.3	1.0	2.3	0.07	1	0.07
Row 3	FaD2	11.5	3.8	7.7	0.25	0	0
Row 4	FaE3	0.9	0.1	0.8	0.03	0	0
Row 5	FvD	10.5	4.4	6.1	0.20	0	0
Row 6	PeC	0.8	0.2	0.6	0.02	1	0.02
Row 7	StG	6.8	0.7	6.1	0.20	0	0
Row 8	Total	38.4	Total	31.2			
Row 9						***Soil Quality Matrix Score***	**0.09**

Source: Guidelines for Determining Significance, Agricultural Resources, DPLU 3/19/07

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TM 5346
Soil Quality Matrix

Table 1

LARA Model Factor Ratings			
	LARA Model Rating		
	High	Moderate	Low
Required Factors			
Climate	X		
Water	X		
Soil Quality			X
Complementary Factors			
Surrounding Land Uses	X		
Land Use Consistency	X		
Slope	X		

Source: Guidelines for Determining Significance, Agricultural Resources, DPLU 3/19/07

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TM 5346
LARA Model Factor Ratings

Table 2

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TM 5346
Cumulative Projects List

Table 3

Project Name/ Acreage	Project Number	Agricultural Use Onsite	Estimated Ag Acres Pre-Development	Estimated Ag Ac Post-Dev.	Important Ag Resource? Prime Farmland (PF) Farmland of Statewide Importance (FSI)	Direct Ag Impact Estimate (Acres)
Rawhide Ranch/ 37.1 ac	MUP 72-618	none	0	0	FSI (<1 ac)	<1
Marquart Ranch/ 39.6 ac	TM 5410	avocado grove	39	30	none	9
West Lilac/ 38.4 ac	TM 5276	active citrus & avocado	90	56	FSI (6 ac)	34
McNulty/ 4.8 ac	TPM 20763	deciduous fruits & nuts	1.6	1	FSI (<1 ac)	<1
Hukari/ 30.0 ac	TPM 20830	avocado orchard	28	25	none	3
Stehly/ 11.7 ac	TPM 20799	avocado & citrus	9	5	none	4
Kohl/ 17.0 ac	TPM 20319	avocado grove	17	12	none	5
Woodhead/ 12.6 ac	TPM 20541	avocado grove	13	8	none	5
Brisa del Mar/ 206.0 ac	TM 5492	none	0	0	none	0
Retreat/ 26.1 ac	MUP 94-025	avocado grove	19	19	none	0
Sanders/ 12.0 ac	TPM 20845	greenhouse & truck crops	9	5	none	4
Dressen/ 11.9 ac	TPM 20727	citrus & avocado grove	10	9	none	1
					TOTALS	67

Project Number	Reason for Determination of No Agricultural Impact
ZAP 70-139	wireless facility (accessory use) [1]
ZAP 03-113	wireless facility (accessory use) [1]
ZAP 99-021	wireless facility (accessory use) [1]
ZAP 01-048	wireless facility (accessory use) [1]
ZAP 02-022	wireless facility (accessory use) [1]
ZAP 03-097	wireless facility (accessory use) [1]
ZAP 04-035	wireless facility (accessory use) [1]
ZAP 06-090	wireless facility (accessory use) [1]
07-010	administrative permit, no agriculture onsite (minor expansion of existing use) [1]
02-042	administrative permit, no agriculture onsite (minor expansion of existing use) [1]
5079	FMMP Urban & Built-up Land
98-0206	boundary adjustment [1]
05-0019	boundary adjustment [1]

Project Number	Reason for Determination of No Agricultural Impact
99-0105	boundary adjustment [1]
05-0087	boundary adjustment [1]
01-0056	boundary adjustment [1]
98-0049	boundary adjustment [1]
TPM 20319	minor subdivision, no ag onsite (minor expansion of existing use) [1]
04-016	no agriculture onsite, no soils of importance onsite (minor expansion of existing use) [1]
04-019	2nd dwelling, no ag onsite (minor expansion of existing use) [1]
MUP 70-212-02	moderate deviation (minor alteration of existing use) [1]
MUP 92-019-02	moderate deviation (minor alteration of existing use) [1]
TPM 20619	withdrawn
05-038	withdrawn
MUP 05-055	withdrawn

[1] per Guidelines for Determining Significance, Agricultural Resources, Section 4.2.1

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TM 5346
Cumulative Projects That Do Not Substantially Impair Viability of Surrounding Agriculture

Table 4

Attachment A

3.1 LARA Model Instructions[6]

Application of the LARA model is intended for use in evaluating the importance of agricultural resources when it is determined that a discretionary project could adversely impact agricultural resources located onsite. The LARA model takes into account the following factors in determining importance of the agricultural resource:

Required Factors:	**Complementary Factors:**
Water	Surrounding Land Uses
Climate	Land Use Consistency
Soil Quality	Topography

Directions for determining the rating for each LARA model factor are provided in sections 3.1.1 through 3.1.6 of this document. Upon rating each factor, it is necessary to refer to Table 2, Interpretation of LARA Model Results, to determine the agricultural importance of the site.

Table 2. Interpretation of LARA Model Results

LARA Model Results			**LARA Model Interpretation**
Possible Scenarios	**Required Factors**	**Complementary Factors**	
Scenario 1	All three factors rated high	At least one factor rated high or moderate	The site is an important agricultural resource
Scenario 2	Two factors rated high, 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		

Data Availability

To complete the LARA model, various data sources are needed. The most efficient approach to completing the model is through analysis within a GIS. To facilitate this approach, the GIS data layers required to complete the LARA model are available upon request from DPLU. Available data sources include: groundwater aquifer type, Generalized Western Plantclimate Zones or "Sunset Zones", and Prime Farmland and

[6] Various data sources referenced in this document are available from DPLU in hard copy format (maps) or in digital format for use within a Geographic Information System (GIS). Obtaining various data sources will be required to determine the importance of the resource.

Farmland of Statewide Importance soil candidates. Other data sources are available from the SANGIS webpage at http://www.sangis.org/.

3.1.1 Water

The water rating is based on a combination of a site's CWA service status, the underlying groundwater aquifer type and the presence of a groundwater well (Table 3). Due to the variability of well yields and the potential for groundwater quality problems to adversely impact the viability of the well for agricultural purposes, the water factor allows for a reduction in the water rating based on site specific well yield and quality data, if that data is available (Table 4).

Table 3. Water Rating [7]

County Water Authority (CWA) Service Status	Groundwater Aquifer Type and Well Presence	Rating
Inside CWA service area with existing water infrastructure connections and a meter	Any groundwater aquifer type	High
Inside CWA service area with infrastructure connections to the site, but no meter has been installed	The site is located in an Alluvial or Sedimentary Aquifer *and* has an existing well	High*
	The site is located in an Alluvial or Sedimentary Aquifer, but has no existing well	Moderate*
	The site is located on Fractured Crystalline Rock and has an existing well	Moderate*
	The site is located on Fractured Crystalline Rock, but has no existing well	Low*
Outside CWA or inside CWA but infrastructure connections are not available at the site and no meter is installed	The site is located in an Alluvial or Sedimentary Aquifer *and* has an existing well	Moderate*
	The site is located in an Alluvial or Sedimentary Aquifer, but has no existing well	Low*
	The site is located on Fractured Crystalline Rock (with or without a well)	Low*
	The site is located in a Desert Basin (with or without a well)	Low*

*These water ratings may be reduced based on available groundwater quantity and quality information, in accordance with Table 4. If no additional groundwater quantity or quality data is available, the ratings above shall apply.

[7] If more than one underlying groundwater aquifer type exists at a site, usually the aquifer type that could produce the most water should be used to obtain the water rating. If it would be more reasonable to apply the rating based on the aquifer that would produce less water, a clear justification and reason for doing so must be provided.

Water Quality and Quantity Limitations

Site specific limitations to groundwater availability and quality exist and can lower the overall water rating of a site when data is available to support the limitation. Sites with imported water availability may not receive a lower water rating based on groundwater quality or yield data. Table 4 outlines potential water availability and quality limitations and the associated effect on the LARA model water rating.

Table 4. Groundwater Availability and Quality Effects on Water Rating

Groundwater Availability and Quality	Effect on Water Rating
The site has inadequate cumulative well yield (<1.9 GPM per acre of irrigated crops); TDS levels above 600 mg/L; or another documented agricultural water quality or quantity limitation exists	Reduces water rating by one level (i.e. from high to moderate or from moderate to low)

A determination of inadequate cumulative well yield as stated in Table 4 means that a site's well cannot produce at least enough water for each acre of irrigated crops at the site. At least 1.9 GPM is required per acre of irrigated crops, equating to production of 3 Acre Feet/Year (AFY) based on the following conversion factor: 1 AFY = 325,851 Gallons per Year / 365 days / 1440 minutes = 0.62 GPM. Cumulative well yield means that the combined yield of all wells on site may be summed to meet the required groundwater yield. As an example, if a site has 5 acres of irrigated crops, then production would need to be at least 9.5 GPM to produce enough water to irrigate the 5 acres, equating to approximately 15 AFY. If residence(s) exist on the project site, the groundwater analysis must demonstrate that an additional supply of 0.5 AFY can be achieved to account for residential water use associated with each existing onsite residence. To allow a reduction in the water quality score, TDS levels above 600 mg/L must be documented. If other documented water quality limitations exist that are not captured in the water quality measure of TDS, the water quality data must be provided and an associated water rating reduction justified. Although these requirements assume that water needs are consistent for a crop throughout the year while water requirements are typically higher in the dryer months, average annual required yield is used as the best available general measure of the adequacy of groundwater yields.

The quality and availability of imported water is not included as a factor to allow a reduction in the water rating due to an assumption that the MWD will continue to deliver water with the 500 mg/L TDS objective. However, it should be recognized that the degradation of the quality of Colorado River water is a known issue that could preclude the production of certain crops in the future. If in the future, the MWD is unable to meet their adopted water quality objectives, a similar reduction for imported water quality may need to be developed for consideration in the water score. Similarly, there is uncertainty regarding the continued future reliability of agricultural water deliveries based on various external issues that may affect local imported water supply such as protection of the Salton Sea and the stability of the Sacramento/San Joaquin Delta. As the impacts from external sources to local agricultural water deliveries become realized, the treatment of the water score in this document may need to be reevaluated.

Water Rating Explanation

Sites with availability of imported water always receive the highest water rating regardless of groundwater availability because the availability of imported water is essential for the long term viability of agriculture due to the limited natural rainfall and limited availability of groundwater resources in the County. Sites within the CWA service area that have no existing water meter, but that have water infrastructure connections to a site (in or near an adjacent street), are assigned a higher water rating than sites without existing water infrastructure connections. This is because the cost of extending off-site water infrastructure and obtaining a water meter is much higher than only obtaining a water meter and constructing onsite infrastructure connections to existing adjacent imported water infrastructure. Furthermore, the presence of existing imported water infrastructure adjacent to a site is a good indication that imported water is likely to become available to the site in the future (more likely than for a site far from infrastructure for imported water).

The underlying groundwater aquifer type and the presence of a well are two additional factors that affect the water rating. In general, sites underlain by an alluvial or sedimentary aquifer receive the highest ratings because these substrates have a much greater capacity to hold water than fractured crystalline rock. A site underlain by an alluvial or sedimentary aquifer with an existing well receives a higher rating than a site underlain by these geologic formations but having no existing well because of the cost associated with well installation. Well installation costs are added to the initial capital outlay required to begin an agricultural operation, thereby reducing the water rating if no well is present. The availability of groundwater in fractured crystalline rock is highly uncertain. However, a site underlain by fractured crystalline rock that has an existing well and is located adjacent to imported water infrastructure receives a moderate rating to take into account the cost of well installation, and the increased likelihood that imported water may become available at the site in the near future. Additionally, while groundwater yield in fractured crystalline rock is generally limited compared to other aquifer types, it can provide a good source of groundwater, especially in valley areas where there may be saturated residuum overlying the fractured crystalline rock. Sites with a well located on fractured crystalline rock, but without imported water infrastructure connections to the site, always receive a low rating because such sites would likely be reliant on a limited groundwater resource for the foreseeable future.

Nearly all agriculture in the desert basins is located in Borrego Valley, where documented groundwater overdraft conditions limit the long-term sustainability of agricultural use. A site located in a desert basin receives a low water rating due to the absence of imported water, and low groundwater recharge rates, which can easily result in groundwater overdraft conditions as documented in Borrego Valley, where extraction rates far exceed natural recharge. The Borrego Municipal Water District is taking measures to reduce water use in the basin through encouraging the fallowing of agricultural land. In addition, the County of San Diego requires proposed projects to mitigate for significant impacts to groundwater supply in accordance with CEQA. Mitigation may be achieved through the fallowing of agricultural land. These factors make preservation of agriculture in Borrego Valley infeasible in the long term when

considering the need to reduce overall groundwater use to protect the public health and the sustainability of the community.

Groundwater Quantity and Quality Explanation

The following discussion explains the reasoning behind the water rating reductions detailed in Table 4, Groundwater Availability and Quality Effects on Water Rating. The lack of a well with adequate yield (1.9 GPM for each acre of irrigated crops) reduces the water rating by one factor. This standard is based on the well yield needed to achieve production of 3 AFY per acre, an average crop irrigation requirement for crops produced locally (Table 5).

Table 5. Crop Water Use Averages

Crop	Typical Water Usage Per Acre (AFY)
Indoor Flowering and Foliage Plants	3-4
Ornamental Shrubs and Trees	3
Avocados	3
Bedding Plants	3
Cut Flowers	2-3
Tomatoes	2
Citrus	2.5-3
Poinsettias	3-4
Strawberries	3
Average	**3**

Source: UC Cooperative Extension, County of San Diego

A well with poor water quality (as measured by TDS levels above 600 mg/L or another documented water quality limitation) may reduce the water rating by one factor to account for agricultural limitations associated with using poor quality water for crop production. Groundwater with TDS concentrations above 600 mg/L is the guideline for allowing a reduction in the water factor based on available research on the effects of TDS on crop production, with specific focus on the effects on crops important to the San Diego region. In general, as TDS levels rise, water has diminishing value for agricultural use as it can restrict the range of crops that can be irrigated with the water and increases the cost of irrigation system maintenance.

According to the San Diego County Water Authority Agricultural Irrigation Water Management Plan, TDS levels above 500 mg/L are problematic for many of the subtropical crops produced in San Diego County, and TDS levels over 1,000 mg/l are virtually unusable for many of the subtropical crops grown here (2001). While TDS concentrations above 500 mg/L can be problematic for many subtropical crops, concentrations above 600 mg/L was selected as the guideline to take into account the already elevated TDS concentrations in imported water sources. Another study (Peterson, 1999) identified the TDS tolerance of selected crops. Field crops such as oat hay, wheat hay and barley were found to tolerate water with TDS levels up to 2,500

mg/L, but these are among the lowest value crops produced in the County. Strawberries were found to be intolerant to TDS levels greater than 500 mg/L; apples, grapes, potato, onion, and peppers slightly tolerant to TDS levels up to 800 mg/L; and cucumbers, tomatoes, and squash moderately tolerant to TDS levels up to 1,500 mg/L. The Florida Container Nursery BMP Guide prepared by the University of Florida Agricultural Extension (2006) identified TDS levels and the associated degree of problem that will be experienced for microirrigated container nursery production at different TDS levels. TDS of 525 mg/L or less was identified as producing no problems, TDS from 525 to 2100 mg/L having increasing problems, and TDS greater than 2100 mg/L having severe problems. High levels of TDS can be overcome through planting more salt resistant crops; however salt resistant crops are typically lower in value and would not produce the economic returns necessary to sustain a viable farming industry in San Diego County (high cost of production and land generally require production of high value crops). In general as TDS levels rise, crop yields decline, maintenance of irrigation systems becomes more difficult, and the range of crops (particularly high value crops) that can be supported is reduced.

In summary, TDS levels in groundwater above 600 mg/L substantially impair the water as a source of irrigation for agriculture, justifying a reduction in the water rating by one factor to account for the potential for reduced yields, increased difficulty in maintaining irrigation systems, and reduction in the range of crops that can be produced.

It is important to note that TDS is only one measure of water quality and does not differentiate between the various types of dissolved solids or contaminants that may be present in water. High levels of certain constituents can cause severe problems for agricultural production. For example, high chloride content can damage certain crops, while nitrates can cause problems for livestock. If specific documented limitations exist that reduce the viability of the water supply for agriculture, the water rating should be reduced. The quality of imported water is not considered because it is assumed that the MWD will deliver water with a maximum TDS of 500 mg/L, their adopted TDS objective for imported water deliveries.

3.1.2 Climate

Ratings associated with each Generalized Western Plantclimate Zone or "Sunset Zone" are included in Table 6, Climate Rating. The table identifies and describes each zone and justification for the associated rating.[8] Detailed descriptions of the Sunset Zones in San Diego County are included in Attachment B.

[8] All Sunset Zones in the County are not included in the table. Zone 22 is a small area that occurs entirely within Camp Pendleton, therefore no rating is assigned to this zone. Zone 24 is the maritime influenced zone. Only limited portions of unincorporated communities exist in this zone (County Islands in National City and the west Sweetwater area). Although this zone is valuable for certain high value crops, it is not assigned any importance rating due to the very small area of unincorporated land that occurs in this zone and the fact that the land is fully urbanized.

Table 6. Climate Rating

Climate (Sunset Zone) Description	Rating	Justification
Zone 23 represents thermal belts of the Coastal Areaclimate and is one of the most favorable for growing subtropical plants and most favorable for growing avocados. Zone 23 occurs in coastal incorporated cities and also occurs in the unincorporated communities of Fallbrook, Rainbow, Bonsall, San Dieguito, Lakeside, western portions of Crest and Valle De Oro, Spring Valley, Otay, and western portion of Jamul-Dulzura.	**High**	Zone 23 is rated high because this climate zone is the most favorable for growing some of the County's most productive crops. Year round mild temperatures allow year round production and the proximity to urban areas and infrastructure facilitates efficient delivery to market.
Zone 21 is an air drained thermal belt that is good for citrus and is the mildest zone that gets adequate winter chilling for some plants. Low temperatures range from 23 to 36 degrees F, with temperatures rarely dropping far below 30 degrees.	**High**	Zone 21 is rated high because of the mild year round temperatures and lack of freezing temperatures that allow year round production of high value crops. The importance of this zone is also related to the conversion pressure that exists due to urban encroachment. Preserving agriculture in Zone 21 is essential to maintain the high returns per acre that are common in this County. Climate is the essential factor that allows high value production. The loss of significant agricultural lands in Zone 21 would eventually relegate agriculture to areas further east where most of the County's high value crops cannot be viably produced. Zone 21 is also favorable due to its location close to urban areas and transportation infrastructure which facilitates product delivery to market.
Zone 20 is a cold air basin that may be dominated by coastal influence for a day, week or month and then may be dominated for similar periods of time by continental air. Over a 20 year period, winter lows in Zone 20 ranged from 28 to 23 degrees F.	**High**	Zone 20 occurs the Ramona area. Citrus groves are common in Zone 20 in addition to a concentration of animal agriculture operations and vineyards. Most of Zone 20 falls within the 89,000-acre Ramona Valley viticultural area which was designated as its own appellation in 2006 and contains 17 vineyards currently cultivating an estimated 45 acres of wine grapes. The distinguishing factors of the Ramona Valley viticultural area include its elevation, which contrasts with the surrounding areas, and climatic factors related to its elevation and inland location. Due to the favorable climate, proximity to urban areas, and its potential to become a more widely recognized viticultural area, Zone 20 is rated as a climate of high importance.
Zone 19 is prime for citrus, and most avocadoes and macadamia nuts can also be grown here.	**High**	Zone 19 is rated high due to the suitability for growing the County's high value crops and its location close to urban areas.

Zone 18 is a mountainous zone subject to frosts. Citrus can be grown in Zone 18, but frosts require the heating of orchards to reduce fruit loss. Zone 18 is the home of Julian's apple orchards.	**Moderate**	Zone 18 is assigned a medium rating due to its frost susceptibility, reducing its potential for supporting year round production and frost sensitive crops. However, the ability to produce crops that require winter chilling makes it a climate zone of moderate importance.
Zone 13 covers low elevation desert areas (considered subtropical) and is the most extensive of the County's desert Plantclimate zones. Zone 13 includes the extensive agricultural uses in the Borrego Valley.	**Moderate**	Zone 13 is assigned a moderate rating due to the temperature extremes characteristic of this zone. These temperature extremes exclude some of the subtropicals grown in Zones 22 to 24, however numerous subtropicals with high heat requirements thrive in this climate such as dates, grapefruit, and beaumontia and thevetia (ornamentals).
Zone 11 is located below the high elevation Zone 3 and above the subtropical desert Zone 13.	**Low**	Zone 11 is assigned a low climate rating due the agricultural hazards of the climate including late spring frosts and desert winds.
Zone 3 occurs in the high elevation Palomar Mountains in addition to high elevation areas east of the Tecate Divide. These are locations where snow can fall and wide swings in temperature occur.	**Low**	Most of these lands are pubic lands, reducing their potential for commercial agriculture. The wide swings in temperature, including freezing temperatures in winter make this zone of low importance agriculturally. This zone is also far from transportation infrastructure; an important consideration for crop delivery to market.

While it is anticipated that the climate ratings would normally not be modified, it is important to acknowledge that microclimate conditions do exist that cannot be captured in the Sunset Zone definitions. For example, topography can create certain microclimate conditions such as frost susceptibility that could downgrade the climate importance of a site to marginal if frost tolerant crops cannot be grown at the site. Any downgrading or upgrading of a climate rating must be accompanied by site specific climate data to support the modification, and any identified climate limitations must be based on the range of crops that could be viable at the site. For example, if frost sensitive crops are the only crop identified to be viable at the site and the site would be subject to frequent frosts, this should be documented and a lower rating may be applied. It is not anticipated that climate modifications would be commonly used given the diversity of crops that a site would usually be able to support.

Sunset Zones are used as a standard measure of climate suitability due to the variability of microclimate conditions that the Sunset zones take into account. Recognizing that the Sunset Zones were not developed as a tool to determine the suitability for commercial agricultural production, their use is not intended to determine suitability for specific crops, rather they are a measure of overall climate suitability for the typical agricultural commodities produced in San Diego County. For example, the Sunset Zone designations take into account the USDA hardiness rating which identifies the lowest temperature at which a plant will thrive. Sunset Zones start with the USDA hardiness zones and add the effects of summer heat in ranking plant suitability for an area. The American Horticulture Society (AHS) heat zone map ranks plants for suitability to heat, humidity and dryness. The AHS heat zone map was developed under the direction of

Dr. H. Marc Cathey, who was instrumental in the organization of the USDA Plant Hardiness Map. Each AHS heat zone has "heat days," those days with temperatures of 86° F or above. 86° F is the point at which some plants suffer damage to cellular proteins. The USDA plant hardiness zone maps and/or the AHS heat zone map may be used to supplement the Sunset Zone information if the Sunset Zone descriptions are not accurate.

3.1.3 Soil Quality

The project's soil quality rating is based on the presence of Prime Farmland Soils or Soils of Statewide Significance (Attachment C) that are available for agricultural use and that have been previously used for agriculture. Land covered by structures, roads, or other uses that would preclude the use of the land for agriculture, are not typically considered in the soil quality rating. To determine the soil quality rating, the soil types on the project site must be identified. The soils data for the project site must be entered into Table 7, Soil Quality Matrix as detailed in the steps below:

Step 1.
Identify the soil types that are on the project site. Enter each soil type in Rows 1 through 13 of Column A. If the site has more soil types than available rows, add additional rows as needed.

Step 2.
Calculate the acreage of each soil type that occurs on the project site and enter the acreage of each in Column B. Enter the total acreage in Row 14, Column B. This number should equal the total acreage of the project site.

Step 3.
Calculate the acreage of each soil type that is unavailable for agricultural use[9] and enter the total in the corresponding rows of Column C.

Step 4.
Subtract the values in Column C from the acreages of each soil type identified in Column B. Enter the result in Column D.

[9] Soils unavailable for agricultural use include: 1) lands with existing structures (paved roads, homes, etc.) that preclude the use of the soil for agriculture, 2) lands that have been disturbed by activities such as legal grading, compaction and/or placement of fill such that soil structure and quality have likely been compromised (e.g., unpaved roads and parking areas), 3) lands that are primarily a biological habitat type that have never been used for agriculture, and 4) lands constrained by biological conservation easements, biological preserve, or similar regulatory or legal exclusion that prohibits agricultural use. The distinction between agriculture and biological resources is not always clear because agricultural lands commonly support sensitive biological species. Agricultural lands that incidentally support sensitive species should still be considered an agricultural resource; however, biological habitats that have never been used for agriculture should not be considered an agricultural resource. It is possible that non-native grasslands will be classified as both a biological resource and an agricultural resource since many non-native grasslands have been established based on a history of agricultural use.

Step 5.
Sum the acreage values in Column D and enter the total in Column D, Row 14.

Step 6.
Divide the acres of each soil type in Column D by the total acreage available for agricultural use (Column D, Row 14) to determine the proportion of each soil type available for agricultural use on the project site. Enter the proportion of each soil type in the corresponding row of Column E.

Step 7.
Determine whether each soil type is a soil candidate for Prime Farmland or Farmland of Statewide Importance. If yes, enter 1 in the corresponding row of Column F. If no, enter zero in the corresponding row of Column F.

Step 8.
Multiply Column E x Column F. Enter the result in the corresponding row of Column G.

Step 9.
Sum the values in Column G and enter the result in Column G, Row 15 to obtain the total soil quality matrix score.

Step 10.
Based on the total soil quality matrix score from Table 7, identify the corresponding soil quality rating using Table 8 Soil Quality Matrix Interpretation

Table 7. Soil Quality Matrix

	Column A	Column B	Column C	Column D	Column E	Column F	Column G
	Soil Type	Size of project site (acreage)	Unavailable for agricultural use	Available for agricultural use	Proportion of project site	Is soil candidate for prime farmland or farmland of statewide significance? (Yes = 1, No = 0)	Multiply Column E x Column F
Row 1							
Row 2							
Row 3							
Row 4							
Row 5							
Row 6							
Row 7							
Row 8							
Row 9							
Row 10							
Row 11							
Row 12							
Row 13							
Row 14	Total		Total				
Row 15						***Soil Quality Matrix Score***	

Table 8. Soil Quality Matrix Interpretation

Soil Quality Matrix Score	Soil Quality Rating
The site has a Soil Quality Matrix score ranging from 0.66 to 1.0 and has a minimum of 10 acres of contiguous Prime Farmland or Statewide Importance Soils	High
The site has a Soil Quality Matrix score ranging from 0.33 to 0.66 or the site has a minimum of 10 acres of contiguous Prime Farmland or Statewide Importance Soils	Moderate
The site has a Soil Quality Matrix score less than 0.33 and does not have 10 acres or more of contiguous Prime Farmland or Statewide Importance Soils	Low

Soil Quality Rating Justification

The presence of Prime Farmland Soils or Soils of Statewide Significance is used as the measure of quality soil in the LARA soil quality rating based on their use in defining soil candidates for the FMMP Farmland categories of Prime Farmland and Farmland of Statewide Importance. Soil candidates for the FMMP Prime Farmland designation are soils with the best combination of physical and chemical characteristics for the production of crops. Soil candidates for the FMMP Farmland of Statewide Importance designation are similar to the soil criteria for Prime Farmland, but include minor shortcomings, such as greater slopes or less ability to store soil moisture. Soil candidates for Farmland of Statewide Importance do not have any restrictions regarding permeability or rooting depth. Soil candidates for Farmland of Statewide Significance are included in this rating to capture quality soils with minor shortcomings that may not have been included, if the typical definition of Prime Agricultural Land as stated in Government Code Section 51201(c) was used. Soil criteria used in Government Code Section 51201(c) identifies any land with a LCC rating of I or II or a Storie Index Rating from 80 to 100 as land that meets the definition of prime agricultural land. Because San Diego County has limited quantities of soils that meet these criteria, locally defined NRCS soil candidates for Prime Farmland and Farmland of Statewide Importance are included to define quality soils in this locale given that 70% of these soils have LCC higher than I or II and 88% have SI ratings below 80. Details regarding the soil criteria that determine the applicability of a soil for the respective Farmland designation is included in Attachment C, Soil Candidate Criteria and Candidate Listing for Prime Farmland and Farmland of Statewide Importance.

Table 8, Soil Quality Matrix Interpretation, identifies high, moderate, or low importance ratings based on the soil quality matrix score from Table 7. The maximum possible soil quality matrix score is one and the minimum is zero because the score is based on the amount of the agricultural resources onsite that are Prime and Statewide Importance soil candidates. A site with a soil quality matrix score of 0.66 or higher means that two-thirds of the agricultural resources onsite have soils that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance. A minimum of 10 contiguous acres is required for a site to be assigned the highest soil quality rating to reflect the need for high quality soils to be contiguous in order for them to be considered useful

agriculturally. If the site has a soil quality score from 0.33 to 0.66 or has 10 acres or more of contiguous soils that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, the site is assigned the moderate importance rating. If less than one-third of the site or less than 10 contiguous acres of the agricultural resources onsite have soils that meet the Prime or Statewide Importance soil criteria, the site is assigned the low importance rating for soil quality. A ten acre threshold is included in the ratings to capture the potential for a large project site to have a substantial quantity of high quality soils and still receive a low importance rating due to the project's size in relation to the acreage of quality soils. Ten acres is an appropriate acreage to use in this context because ten acres would typically be able to support a wide range of agricultural uses in San Diego County. Furthermore, to be eligible for a Williamson Act Contract in an Agricultural Preserve, the County of San Diego Board of Supervisor's Policy I-38 (Agricultural Preserves) recommends various minimum ownership sizes, with ten acres being the minimum, to be eligible for a contract. Ten acres is listed as the minimum size for various agricultural activities including poultry, tree crops, truck crops, and flowers. The requirement that the land be contiguous recognizes that small, scattered pockets of high quality soils are less valuable for agricultural use than an area of contiguous high quality soils.

3.1.4 Surrounding Land Use

Surrounding land use is a factor in determining the importance of an agricultural resource because surrounding land uses that are compatible with agriculture make a site more attractive for agricultural use due to lower expectations of nuisance issues and other potential impacts from non-farm neighbors. This factor also accounts for the degree to which an area is primarily agricultural, assigning a higher rating to areas dominated by agricultural uses than an area dominated by higher density, urban development. Surrounding land use is a complementary factor in the LARA model because the presence of compatible surrounding land uses can support the viability of an agricultural operation; however a lack of compatible surrounding land uses would not usually prohibit productive agriculture from taking place (depending on the type of production). Similarly, agriculture can be viable among urban uses, but its long term viability would generally be less than an agricultural operation conducting operations in an area dominated by agricultural uses because of lesser economic pressures to convert to urban uses. To determine the surrounding land use rating, the following information must be determined:

Step 1.
Calculate the total acreage of lands compatible with agricultural use[10] within the defined Zone of Influence (ZOI).[11] The location of agricultural lands can be determined using information from the DOC's Important Farmland Map Series, agricultural land use data available from the DPLU, aerial photography, and/or direct site inspection. Land within a ZOI that is observed to be fallow or with a history of agricultural use will usually be considered agricultural land, unless there is evidence that it has been committed to a non-agricultural use (such as having an approved subdivision map). The Department of Planning and Land Use may consult the Department of Agriculture, Weights and Measures if there are disputed interpretations.

Step 2.
Calculate the percentage of the acreage within the project's ZOI that is compatible with agricultural use.

Step 3.
Based on the proportion of lands within the ZOI that are compatible with agricultural use, identify the appropriate surrounding land use rating in accordance with Table 9, Surrounding Land Use Rating.

Table 9. Surrounding Land Use Rating

Percentage of Land within ZOI that is Compatible with Agriculture	Surrounding Land Use Rating
50% or greater	High
Greater than 25% but less than 50%	Moderate
25% or less	Low

Considering surrounding land uses within the ZOI is intended to provide a measurement of the long term sustainability of agriculture at the project site. Agriculture is generally

[10] Lands compatible with agricultural uses include existing agricultural lands, protected resource lands, and lands that are primarily rural residential. Protected resource lands are those lands with long-term use restrictions that are compatible with or supportive of agricultural uses including but not limited to Williamson Act contracted lands; publicly owned lands maintained as park, forest, open space, or watershed resources; and lands with agricultural, wildlife habitat, open space, or other natural resource easements that restrict the conversion of such land to urban or industrial uses. For the purposes of this factor rating, rural residential lands include any residential development with parcel sizes of two acres or greater and that contain elements of a rural lifestyle such as equestrian uses, animal raising, small hobby type agricultural uses, or vacant lands. Residential parcels with swimming pools, children's play areas, second dwelling units, or other accessory uses that occupy a majority of the usable space of a residential parcel should not be identified as land compatible with agriculture.

[11] Attachment F details the steps required to determine the Zone of Influence (ZOI). The ZOI methodology is taken from the Department of Conservation's Land Evaluation Site Assessment (LESA) model and includes a minimum area of ¼ mile beyond project boundaries and includes the entire area of all parcels that intersect the ¼ mile boundary. The ZOI developed by the Department of Conservation is the result of several iterations during development of the LESA model for assessing an area that would generally be a representative sample of surrounding land use. For example, a 160 acre project site would have a ZOI that is a minimum of eight times greater (1280 acres) than the project itself.

compatible with other agricultural land uses because they are more likely be tolerant of the typical activities and nuisances associated with agricultural operations than urban land uses would be. Primarily rural residential lands are included as a land use compatible with agriculture because rural residential lands are already common among agricultural uses and most active farms also have residences on the site. Although not all types of agriculture are compatible with rural residential land uses (i.e. confined animal facilities); many typical San Diego County farming operations are compatible with rural residential land uses as is evidenced by the existing viability of agricultural operations that are located among rural residential land uses. For example, in many North County communities, small parcels (two acres, for example) with a single family residence and a small orchard or other farming or equestrian use are common. These residential uses, due to their direct involvement in agriculture or a rural lifestyle, would tend to be more compatible with agriculture than a high density development where homeowners would be less likely to be directly involved in rural lifestyle activities (e.g. agriculture, equestrian, animal raising, etc.). Occupants of higher density residential uses are more likely to be disturbed by noise, dust, pesticides or other nuisances that do not fit with the peaceful perceptions of living in the countryside.

3.1.5 Land Use Consistency

The median parcel size associated with the project site compared to the median parcel size of parcels located within the ZOI is a complementary factor used in the LARA model. In order to determine the land use consistency rating for the project, the following information must be determined:

Step 1.
Identify the median parcel size associated with the proposed project if the proposed project consists of at least three parcels. If the proposed project consists of two parcels, use an average. If the proposed project consists of only one parcel, then no median or average is needed.

Step 2.
Identify the median parcel size of the parcels located within the project's ZOI.

Step 3.
Considering the project's median parcel size and the ZOI median parcel size, identify the land use consistency rating in accordance with Table 10.

Table 10. Land Use Consistency Rating

Project's median parcel size compared to ZOI median parcel size	Land Use Consistency Rating
The project's median parcel size is smaller than the median parcel size within the project's ZOI	High
The project's median parcel size is up to ten acres larger than the median parcel size within the project's ZOI	Moderate
The project's median parcel size is larger than the median parcel size within the project's ZOI by ten acres or more	Low

Land use consistency is used as a measure of importance to recognize the effect that surrounding urbanization has on the viability of ongoing agricultural uses and to recognize that as urbanization surrounds agricultural lands, opportunity costs[12] for agricultural operators increase, thus reducing the viability of an agricultural operation. A site surrounded by larger parcels indicates that the site is located in an area that has not already been significantly urbanized and the area is more likely to continue to support viable agricultural uses. On the other hand, a site surrounded by smaller parcels indicates a lower likelihood of ongoing commercial agriculture viability considering the greater expectations of land use incompatibilities that the site is likely to experience and the reduction in economic viability when considering forgone opportunity costs. The median parcel size is used instead of an average to account for the potential for a very large or very small parcel to exist that would skew the result if using an average.

3.1.6 Slope

To determine the Slope Rating for the site, the average slope for the area of the site that is available for agricultural use must be determined. Refer to Column D of Table 7, Soil Quality Rating Matrix, for the areas of the site considered available for agricultural use. When the average slope of the areas of the site that is available for agricultural use is determined, identify the corresponding topography rating as outlined in Table 11, below.

Table 11. Slope Rating

Average Slope	Topography Rating
Less than 15% slope	High
15% up to 25% slope	Moderate
25% slope and higher	Low Importance

[12] Opportunity cost is an economic term. It means the cost of something in terms of an opportunity foregone (and the benefits that could be received from that opportunity), or the most valuable foregone alternative. For example, if a land owner decides to farm his land, the opportunity cost is the value of one or more alternative uses of that land, such as a residential subdivision. If he continues to farm the land, the opportunity cost is the revenue that he does not receive from building houses. Thus, as opportunity costs rise, the viability of continuing the current action (i.e. agricultural use) decreases. This conclusion is based on the fact that agricultural use of land is primarily an economic decision. When factors, such as increased opportunity costs, make use of the land for agriculture less profitable than other uses, the long term viability of agriculture decreases.

Slope is included as a complementary factor in the LARA model to account for the importance that slope plays in the viability of a piece of land for agricultural production, a flat site allowing a greater range of potential agricultural uses and facilitating mechanization of operations. Gentle topography has other benefits such as reduced difficulty in managing irrigation runoff and reduced soil erosion as compared to more steep sites. Topography is not a required factor for a determination of importance because topography limitations can be overcome at a cost if the expected return on investment is high enough to warrant the expense (i.e. container based production, mass grading).

4.0 TYPICAL ADVERSE EFFECTS AND GUIDELINES FOR DETERMINING SIGNIFICANCE

4.1 Typical Adverse Effects

Typical adverse effects to agricultural resources are best considered in relation to the various types of impacts that are considered under CEQA: direct, indirect and cumulative. Direct impacts are straightforward: important agricultural resources are converted to a non-agricultural use, significantly reducing or eliminating the productive capacity of the land. Indirect effects are widely varied and require careful analysis of particular site conditions and farming operations. Indirect effects include significant impacts to active agricultural operations, Williamson Act Contracts, or to the viability of important agricultural resources. Indirect effects can result from growth inducement and the associated extension of infrastructure that can change rural character and increase the likelihood of agriculture urban interface conflicts. Indirect impacts can be caused by significant economic impacts to active agricultural operations that compromise their on-going viability and result in increased likelihood of conversion. Significant cumulative impacts result when a project's impacts are considerable when viewed in connection with the effects of past, present and probable future projects. Cumulative impacts are difficult to assess given the market driven and adaptable nature of agriculture. For example, a loss of agricultural land may occur in one area, while new land is converted to agriculture use elsewhere. Similarly, changes in agricultural commodity market prices could result in a shift in the type of agricultural commodities produced locally. Changes in the agricultural industry that result from external market factors could appear to be significant cumulative impacts to agriculture when they may only be a result of market adaptation to external economic conditions.

4.1.1. Direct Impacts

Direct impacts occur when a project would adversely impact locally important agricultural soils on a site that is determined to be important pursuant to the County LARA model. In San Diego County, important agricultural soils include not only soils with the USDA LCC ratings of I and II or Storie Index ratings of 80 or higher, but also includes soils of lesser quality as defined by the soil candidate listing for Prime Farmland and Farmland of Statewide Importance compiled by the USDA NRCS for San

Attachment B

IMPORTANT FARMLAND MAPPING CATEGORIES

The following definitions are used in preparing the Important Farmland Maps and the Farmland Conversion Report.

The definitions for Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Urban Built-up Land were developed by the USDA-SCS as part of their nationwide Land Inventory and Monitoring (LIM) system.

These LIM definitions have been modified for use in California. The most significant modification is that Prime Farmland and Farmland of Statewide Importance must be irrigated. Farmland of Local Importance has been identified by local advisory committees and vary from county to county, as intended by the LIM. Mapping of Grazing Land as part of an Important Farmland Map is unique to California. The minimum mapping unit is 10 acres unless otherwise specified. Units of land smaller than 10 acres will be incorporated into the surrounding map classifications.

Prime Farmland

Prime Farmland is land which has the best combination of physical and chemical characteristics for the production of crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods. Prime Farmland must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date. It does not include publicly owned lands for which there is an adopted policy preventing agricultural use.

Prime Farmland must meet all the following criteria:

a. Water

The soils have xeric, ustic, or aridic (torric) moisture regimes in which the available water capacity is at least 4.0 inches (10 cm) per 40 to 60 inches (1.02 to 1.52 meters) of soil, and a developed irrigation water supply that is dependable and of adequate quality. A dependable water supply is one which is available for the production of the commonly grown crops in 8 out of 10 years; and

b. Soil Temperature Range

The soils have a temperature regime that is frigid, mesic, thermic, or hyperthermic (pergelic and cryic regimes are excluded). These are soils that, at a depth of 20 inches (50.8 cm), have a mean annual temperature higher than 32°F (0° C). In addition, the mean summer temperature at this depth in soils with an O horizon is higher than 47° F (8° C); in soils that have no O horizon, the mean summer temperature is higher than 59° F (15° C); and

c. Acid-Alkali Balance

The soils have a pH between 4.5 and 8.4 in all horizons within a depth of 40 inches (1.02 meters); and

d. Water Table

b. Soil Temperature Range

The soils have a temperature regime that is frigid, mesic, thermic, or hyperthermic (pergelic and cryic regimes are excluded). These are soils that, at a depth of 20 inches (50.8 cm), have a mean annual temperature higher than 32° F (0° C). In addition, the mean summer temperature at this depth in soils with an O horizon is higher than 47° F (8° C); in soils that have no O horizon, the mean summer temperature is higher than 59° F (15° C); and

c. Acid-Alkali Balance

The soils have a pH between 4.5 and 9.0 in all horizons within a depth of 40 inches (1.02 meters) or in the root zone if the root zone is less than 40 inches (1.02 meters) deep; and

d. Water Table

The soils have no water table or have a water table that is maintained at a sufficient depth during the cropping season to allow cultivated crops common to the area to be grown; and

e. Soil Sodium Content

The soils can be managed so that, in all horizons within a depth of 40 inches (1.02 meters), or in the root zone if the root zone is less than 40 inches (1.02 meters) deep, during part of each year the conductivity of the saturation extract is less than 16 mmhos/cm and the exchangeable sodium percentage is less than 25; and

f. Flooding

Flooding of the soil (uncontrolled runoff from natural precipitation) during the growing season occurs infrequently, taking place less often than once every two years; and

g. Erodibility

The product of K (erodibility factor) multiplied by the percent of slope is less than 3.0; and

h. Rock Fragment Content

Less than 10 percent of the upper 6 inches (15.24 cm) in these soils consists of rock fragments coarser than 3 inches (7.62 cm).

Farmland of Statewide Importance does not have any restrictions regarding permeability or rooting depth.

Unique Farmland

Unique Farmland is land which does not meet the criteria for Prime Farmland or Farmland of Statewide Importance, that has been used for the production of specific high economic value crops at some time 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. Examples of such crops may include oranges, olives, avocados, rice, grapes, and cut flowers. It does not include publicly owned lands for which there is an adopted policy preventing agricultural use.

Grazing Land

Grazing Land is defined in Government Code §65570(b)(3) as:

> "...land on which the existing vegetation, whether grown naturally or through management, is suitable for grazing or browsing of livestock."

The minimum mapping unit for Grazing Land is 40 acres.

Grazing Land does not include land previously designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance, and heavily brushed, timbered, excessively steep, or rocky lands which restrict the access and movement of livestock.

The FMMP convenes a grazing land advisory committee in each project county to help identify grazing lands. The committees consist of members of the local livestock ranching community, livestock ranching organizations, and the U. C. Cooperative Extension livestock advisor. The FMMP works with the president of the local Cattlemen's Association and the U.C. Cooperative Extension livestock advisor in selecting members of these committees.

Urban and Built-up Land

Urban and Built-up Land is used for residential, industrial, commercial, construction, institutional, public administrative purposes, railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. Highways, railroads, and other transportation facilities are mapped as a part of Urban and Built-up Land if they are a part of the surrounding urban areas.

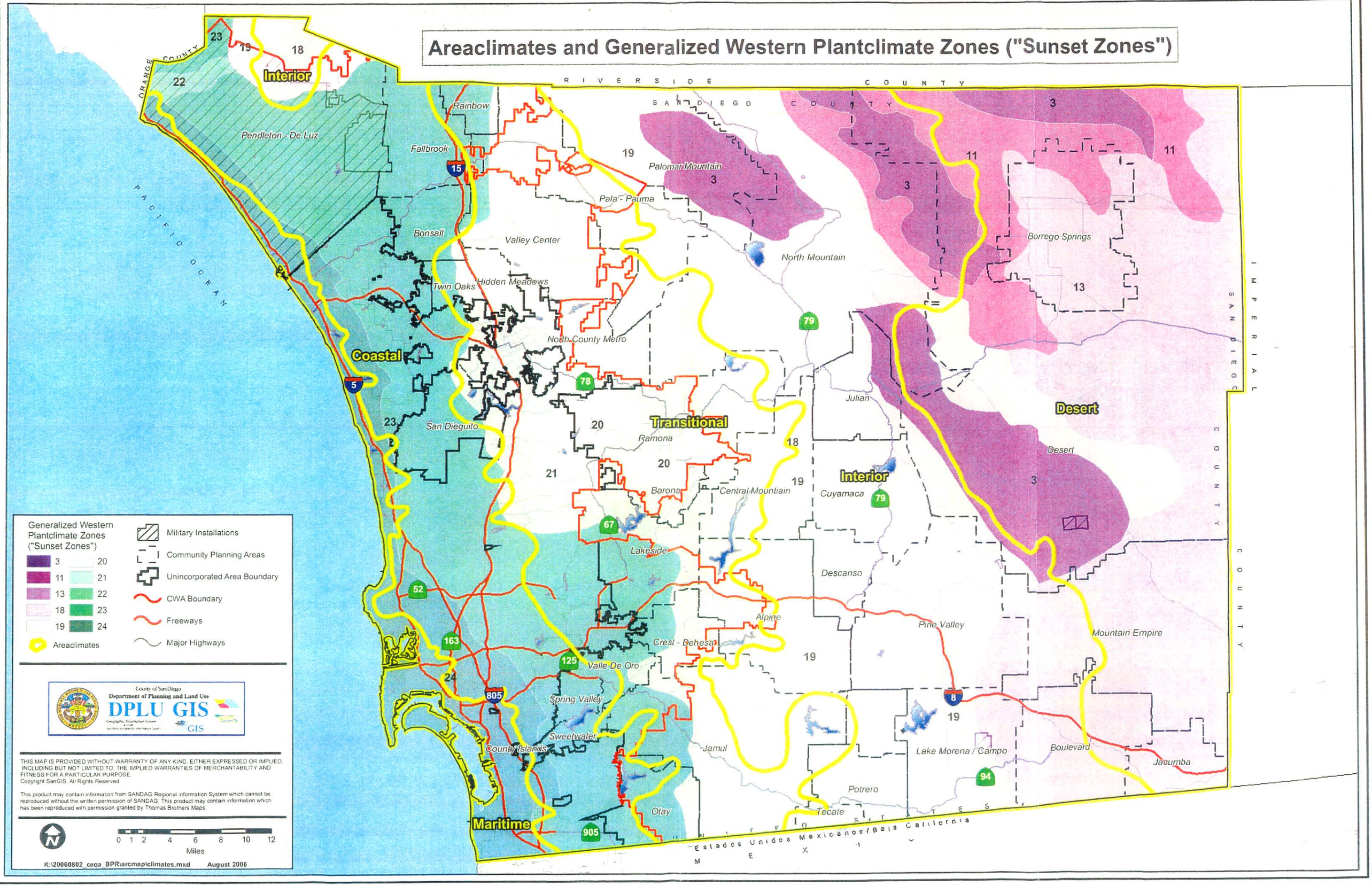
Units of land smaller than 10 acres will be incorporated into the surrounding map classifications. The building density for residential use must be at least 1 structure per 1.5 acres (or approximately 6 structures per 10 acres). Urban and Built-up Land must contain man-made structures or buildings under construction, and the infrastructure required for development (e.g., paved roads, sewers, water, electricity, drainage, or flood control facilities) that are specifically designed to serve that land. Parking lots, storage and distribution facilities, and industrial uses such as large packing operations for agricultural produce will generally be mapped as Urban and Built-up Land even though they may be associated with agriculture.

Urban and Built-up Land does not include strip mines, borrow pits, gravel pits, farmsteads, ranch headquarters, commercial feedlots, greenhouses, poultry facilities, or road systems for freeway interchanges outside of areas classified as Urban and Built-up Land areas.

Within areas classified as Urban and Built-up Land, vacant and nonagricultural land which is surrounded on all sides by urban development and is less than 40 acres in size will be mapped as Urban and Built-up. Vacant and nonagricultural land larger than 40 acres in size will be mapped as Other Land.

Attachment C

Areaclimates and Generalized Western Plantclimate Zones ("Sunset Zones")



Attachment D

County Water Authority (CWA) Boundary and Groundwater Aquifer Types

ORANGE COUNTY
RIVERSIDE COUNTY
SAN DIEGO COUNTY
IMPERIAL COUNTY
PACIFIC OCEAN
Estados Unidos Mexicanos / Baja California
MEXICO

Pendleton - De Luz
Rainbow
Fallbrook
Palomar Mountain
Pala - Pauma
Bonsall
Valley Center
Twin Oaks
Hidden Meadows
North County Metro
North Mountain
Borrego Springs
San Dieguito
Ramona
Julian
Desert
Barona
Central Mountain
Cuyamaca
Lakeside
Descanso
Alpine
Pine Valley
Crest - Dehesa
Mountain Empire
Valle De Oro
Spring Valley
Sweetwater
Jamul
Lake Morena / Campo
Boulevard
Jacumba
Potrero
Otay
Tecate

5 15 78 79 67 52 163 125 8 805 94 905

Aquifer Types

- Alluvial and Sedimentary Aquifer
- Desert Basins
- Fractured Crystalline Rock

County Water Authority Boundary

- Military Facilities
- Community Planning Areas
- Unincorporated Area Boundary
- Water Bodies
- Freeways
- Major Highways

County of San Diego
Department of Planning and Land Use
DPLU GIS
SanGIS

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Attachment E

ORANGE COUNTY

RIVERSIDE COUNTY

SAN DIEGO COUNTY

IMPERIAL COUNTY

PACIFIC OCEAN

Pendleton-De Luz

Fallbrook

Rainbow

Bonsall

Pala-Pauma

Valley Center

North Mountain

North County Metro

San Dieguito

Ramona

Julian

Desert

Barona

County Islands

Lakeside

Alpine

Crest-Dehesa

Central Mountain

Mountain Empire

Valle De Oro

Spring Valley

Sweetwater

Jamul-Dulzura

Otay

15

79

67

52

163

805

8

94

905

UNITED STATES

Estados Unidos Mexicanos/Baja California

MEXICO

Williamson Act Contract Lands

- Williamson Contract Parcels
- Agricultural Preserves
- Community Planning Areas
- Unincorporated Area
- County Water Authority
- Water Bodies
- Freeways
- Major Highways

County of San Diego
Department of Planning and Land Use
DPLU GIS
SanGIS

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Attachment F

San Diego County
Cumulative Research Documentation
For the Following Projects:

TM 5410
TPM 20830
TPM 20799
TPM 20319
TPM 20845
TPM 20727

TPM 20830

ERIC GIBSON
INTERIM DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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MITIGATED NEGATIVE DECLARATION

April 19, 2007
Revised June 7, 2007

Project Name: Hukari Minor Residential Subdivision

Project Number(s): TPM 20830, Log No. 04-02-017

This Document is Considered Draft Until it is Adopted by the Appropriate County of San Diego Decision-Making Body.

This Mitigated Negative Declaration is comprised of this form along with the Environmental Initial Study that includes the following:

a. Initial Study Form
b. Environmental Analysis Form and attached extended studies for Archaeology, Agriculture, and Drainage

1. California Environmental Quality Act Mitigated Negative Declaration Findings:

   Find, that this Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period; and that revisions in the project plans or proposals made by or agreed to by the project applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and, on the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration) that there is no substantial evidence that the project as revised will have a significant effect on the environment.

2. Required Mitigation Measures:

   Refer to the attached Environmental Initial Study for the rationale for requiring the following measures:

Control station(s) having California Coordinate values of first order accuracy or better, as published in the County of San Diego's Horizontal Control book. These tie lines to the existing control shall be shown in relation to the California Coordinate System (i.e. Grid bearings and Grid distances). All other distances shown on the map are to be shown as Ground distances. A combined factor for conversion of Grid-to-Ground distances shall be shown on the map.

4. For purposes of this section, the date of survey for the field observed connections shall be the date of survey as indicated in the surveyor's/engineer's certificate as shown on the final map.

5. Comply with all applicable stormwater regulations at all times. The activities proposed under this application are subject to enforcement under permits from the San Diego Regional Water Quality Control Board (RWQCB) and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance (Ordinance No. 9424 and Ordinance No. 9426) and all other applicable ordinances and standards. This includes requirements for materials and wastes control, erosion control, and sediment control on the project site. Projects that involve areas greater than 1 acre require that the property owner keep additional and updated information on-site concerning stormwater runoff. This requirement shall be to the satisfaction of the Director of Public Works.

ADOPTION STATEMENT: This Mitigated Negative Declaration was adopted and above California Environmental Quality Act findings made by the:

on JUL 26 2007

JOSEPH FARACE, AICP, Planning Manager
Regulatory Planning Division

JF:CP:jcr

ND04-07\0402017-ND

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☑ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project proposes a minor residential subdivision, which may include outdoor lighting. Any future outdoor lighting pursuant to this project shall be required to meet the requirements of the County of San Diego Zoning Ordinance (Section 6322-6326) and the Light Pollution Code (Section 59.101-59.115).

The project will not contribute to significant cumulative impacts on day or nighttime views because the project will conform to the Light Pollution Code. The Code was developed by the San Diego County Department of Planning and Land Use and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level

II. AGRICULTURE RESOURCES -- In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☑ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site contains Unique Farmland and the surrounding area within a radius of one mile has land designated as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. However, as discussed in the Agricultural Analysis, dated February 22, 2005, prepared by James Chagala and Associates on file with the Department of Planning and Land Use as Environmental Review Number 04-02-017 the project will not result in the potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance for the following reasons: 1) none of the areas being impacted by this project are classified as Prime Farmland or Farmland of Statewide Importance, 2) the area of this development contains only a minor amount of area classified as Farmland of Statewide Importance and will have only a small amount of area impact, 3) there are no Prime Farmland Soils, no soil rated high in fertility or high suitability for crops grown in the area, no Prime Farmlands being converted, and only a small amount of Unique Farmland will be impacted. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use will occur as a result of this project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is zoned A70 (Limited Agriculture), which is considered to be an agricultural zone. However, the proposed project will not result in a conflict in zoning for agricultural use, because minor residential subdivisions are a permitted use in A70 zones and will not create a conflict with existing zoning for agricultural use. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, there will be no conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site contains Unique Farmland and the surrounding area within a radius of one mile has land designated as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. However, as discussed in the Agricultural Analysis, dated February 22, 2005, prepared by James Chagala and Associates on file with the Department of Planning and Land Use as Environmental Review Number 04-02-017 the project will not result in the potentially significant conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance for the following reasons: 1) none of the areas being impacted by this project are classified as Prime Farmland or Farmland of Statewide Importance, 2) the area of this development contains only a minor amount of area classified as Farmland of Statewide Importance and will have only a small amount of area impact, 3) there are no Prime Farmland Soils, no soil rated high in fertility or high suitability for crops grown in the area, no Prime Farmlands being converted, and only a small amount of Unique Farmland will be impacted. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use will occur as a result of this project.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project proposes development that was anticipated in SANDAG growth projections used in development of the RAQS and SIP. Operation of the project will not result in emissions of significant quantities of criteria pollutants listed in the California Ambient Air Quality Standards or toxic air contaminants as identified by the California Air Resources Board. As such, the proposed project is not expected to conflict with either the RAQS or the SIP. In addition, the project is consistent the SANDAG growth projections used in the RAQS and SIP, therefore, the project will not contribute to a cumulatively considerable impact.

TPM 20799

ERIC GIBSON
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017
www.sdcounty.ca.gov/dplu

February 11, 2009

Jerome and Christina Stehly
3602 Plumosa Drive
San Diego, CA 92106

RE: TPM 20799; CAMINITO QUIETO MINOR SUBDIVISION; ER 04-02-001; 8TH ITERATION REVIEW OF INITIAL STUDIES/INFORMATION

The Department of Planning and Land Use (DPLU) has completed the review of your Extended Initial Study/Information and determined it to be "incomplete" as defined by the California Environmental Quality Act (CEQA). At this time, additional information or revisions will be required to determine your project's potential impacts on the environment and complete the CEQA Environmental Initial Study. The reasons for this determination and the revisions/information required are listed under the Revisions and Additional Information Section. The following is a summary of documents reviewed by county staff and the current status for each document:

Study Reviewed	**Status**
Preliminary Grading Plan	**Resubmit**
Tentative Parcel Map	**Resubmit**
Drainage Study	**Resubmit**
SWMP	**Resubmit**
Fire Protection Plan	**Accepted on May 12, 2008**
Agricultural Analysis	**Accepted on December 29, 2005**
Sight Distance Certification	**Accepted on May 18, 2004**

CAMINITO QUIETO TENTATIVE PARCEL MAP
SAN DIEGO COUNTY, CALIFORNIA
CASE NUMBER: TPM 20799
ENVIRONMENTAL LOG: 04-02-001
PROJECT ADDRESS: 32013 Caminito Quieto
APN # 127-271-23

AGRICULTURAL ANALYSIS

MARCH 2004
Revised NOVEMBER 2004
Revised MARCH 2005
Revised NOVEMBER 2005

Accepted
12/29/2022

Prepared For:

Jerome and Christina Stehly

Submitted to:

County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Prepared by:

David Hethorn
421 N. Horne Street
Oceanside, CA

Tel (760) 807-3248 * Fax (760) 731-6[illegible]

impact on agriculture due to subdividing lands in San Diego County has not had an impact on total acreage such that total acreage in production has declined, in fact total acreage has increased.

I. Conclusions and Recommendations

The proposed project will have no direct impacts on agricultural resources based on the LESA model. The project will not have indirect impacts on agricultural resources because the parcel sizes in the area that have existing agriculture are in the 2.5 to 7 acre range, which is consistent with the proposed projects' parcel sizes. The agricultural uses in the area (generally avocado and citrus) are compatible with residential uses; therefore the proposed subdivision would not result in the conversion of agricultural to non-agricultural use. A cumulative impact analysis was completed and it was determined that the project in combination with other projects in the area would not result in a cumulatively considerable agricultural resource impact because a majority of the projects create parcels that are consistent with the ongoing use of the site for agriculture. The project will not result in impacts to agriculture beyond the on-site impacts for pad and road development. The project does not significantly preclude the use of the site or the surrounding area for continuing agricultural uses. Therefore, it has been determined that there are no direct, indirect, or cumulative impacts on agricultural resources as a result of this project and no mitigation is necessary.

J. Certification

This report was prepared by David Hethorn, who is certified by the County to prepare an Agricultural Analysis.

Mr. Hethorn is currently employed by a farm management company located in North San Diego County. He has a degree in Agricultural Business from California State University Fresno, he holds a Qualified Pesticide Applicators License. Past employment has included Vice President Farm Credit Association of Southern California, Escondido Branch, where he gained extensive knowledge into San Diego County agriculture as a loan officer and appraiser. Mr. Hethorn was involved with preparing reports for the various agencies in association with a 10A Take Permit on a project located in Oceanside California and is familiar with many environmental agency requirements. He has also previously submitted agricultural analysis to the county.

TPM 20319

TPM 20319

Information regarding this project could not be obtained. According to San Diego County Project Processing Staff Manager Juan Jasso, this file is available only online through the County's website (http://geodocspublic.co.san-diego.ca.us/default.aspx). This website has been consistently inaccessible for viewing at the San Diego County Department of Planning and Land Use office located at 5201 Ruffin Road and at various private computer locations. County Project Processing Staff and the Agricultural Consultant has repeatedly tried to access this file online and has also attempted to find a hard copy of the file and has been unsuccessful. The Agricultural Consultant was told that hard copies were being scanned into the above website and then destroyed.

TPM 20845

ERIC GIBSON
INTERIM DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
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TOLL FREE (800) 411-0017

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

May 1, 2008

NOTICE IS HEREBY GIVEN that the County of San Diego is proposing to adopt Negative Declaration(s) in accordance with the California Environmental Quality Act for the following project(s). The proposed Negative Declaration(s) can be reviewed on the World Wide Web at **http://www.sdcounty.ca.gov/dplu/ceqa_public_review.html**, at the Department of Planning and Land Use (DPLU), Project Processing Counter, 5201 Ruffin Road, Suite B, San Diego, California 92123 and the public library(ies) listed below. Comments on these proposed Negative Declaration(s) must be sent to the DPLU address listed above and should reference the project number and name.

TPM 20845, LOG NO. 04-02-028; SANDERS MINOR SUBDIVISION. The project is the 4 lot plus a remainder residential subdivision.. The project is located south of West Lilac Road and approximately one and a quarter miles from Interstate 15 within the Bonsall Community Planning Area within the unincorporated area of San Diego County. Comments on this proposed Mitigated Negative Declaration must be received no later than May 30, 2008 at 4:00 p.m. (a 30 day public review period). This proposed Mitigated Negative Declaration can also be reviewed at the Fallbrook Branch Library, located at 124 S. Mission Rd. Fallbrook, CA 92028. For additional information, please contact Anna Lowe at (858) 694-3704 or by e-mail at Anna.Lowe@sdcounty.ca.gov.

II. AGRICULTURAL RESOURCES -- Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- ☐ Potentially Significant Impact
- ☐ Less Than Significant With Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact:
The project site has a current greenhouse and truck farming production operation on approximately 8.13 acres of a 12.04 acre site. Due to the presence of onsite and surrounding agricultural resources, the County agricultural resources specialist, Jarrett Ramaiya, evaluated the site to determine the importance of the resource based on an Agricultural Analysis, prepared by James Chagala of James Chagala and Associates, dated April 21, 2006.

The project will not result in the potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance for the following reasons: The loss of 2.56 acres of Unique Farmland agriculture is not a cumulative impact because this loss represents less than 0.16% of the cumulative study area. Approximately 67.9% of the land that is currently under agricultural production will continue to be used for agriculture on lots that would be above 2 acres in size. Agriculture acreage in the County of San Diego has actually increased from 2003 through 2004 by 640 acres. In addition, project development will not preclude continued and/or future agriculture on the proposed lots. The proposed project has parcel sizes that are consistent with the surrounding area, which contain many parcels of 2 acres in size and larger. Parcels of this size can support agricultural uses. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- ☐ Potentially Significant Impact
- ☐ Less Than Significant With Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact
The project site is zoned A70 (Limited Agricultural), which is considered to be an agricultural zone. However, the proposed project will not to result in a conflict in zoning for agricultural use, because residential uses are a permitted use in A70 zones and will not create a conflict with existing zoning for agricultural use. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, there will be no conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

☐ Potentially Significant Impact ☑ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact
The project site and surrounding area within a radius of three miles have Unique Farmland. As a result, the proposed project was reviewed by Jarrett Ramaiya, Agricultural Specialist, based upon the review of an Agricultural Analysis, prepared by James Chagala of James Chagala and Associates, dated April 21, 2006, and was determined not to have significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance or active agricultural operations to a non-agricultural use for the following reasons: Surrounding active agricultural operations consist of greenhouses, row and field crops, and orchards which commonly operate among residential uses and create minimal land use conflicts. The addition of five residences would not introduce a change in the existing environment that could affect land uses. In addition, active agricultural operations in the surrounding area are already interspersed with single family residential uses and the proposed use would not significantly change the existing land uses in the area, resulting in a change that could convert agricultural operations to a non-agricultural use.

Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

☐ Potentially Significant Impact ☑ Less than Significant Impact

SUMMARY OF FINDINGS

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

- The project will not result in the conversion of Prime Agricultural Soils.
- The project will not result in the conversion of Prime Farmland or Farmland of Statewide Importance.
- The project will impact only 2.5 acres of the Unique Farmland found on the property.
- The LESA Model developed by the State of California indicates there will not be significant impacts as a result of this project.
- The project will establish parcels sizes that can support agriculture in the future.
- The project will not conflict with agricultural zoning or use regulations.
- The project will not result in a conflict with a County Agricultural Preserve.
- The project will not result in a conflict with a land conservation contract.
- The density proposed by the project will not have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.
- A significant proportion of the existing agriculture on the subject property will not be directly impacted through building pads, roads, or driveways.
- This project, in conjunction with other existing and proposed projects, would not have an impact to agriculture that is cumulatively considerable pursuant to the State CEQA Guidelines.

TPM 20727

GARY L. PRYOR
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
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SAN MARCOS OFFICE
338 VIA VERA CRUZ - SUITE 201
SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. - SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

MITIGATED NEGATIVE DECLARATION

December 8, 2005

FINAL

Project Name: Dreessen TPM

Project Number(s): TPM 20727, Log No. 03-02-008

This Document is Considered Draft Until it is Adopted by the Appropriate County of San Diego Decision-Making Body.

This Negative Declaration is comprised of this form along with the Environmental Initial Study that includes the following:

a. Initial Study Form
b. Environmental Analysis Form and attached extended studies for water quality (stormwater), drainage, biological resources, and cultural resources (negative findings).

1. California Environmental Quality Act Negative Declaration Findings:

Find, that this Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period; and that revisions in the project plans or proposals made by or agreed to by the project applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and, on the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration) that there is no substantial evidence that the project as revised will have a significant effect on the environment.

2. Required Mitigation Measures:

Refer to the attached Environmental Initial Study for the rationale for requiring the following measures:

been met shall be submitted to the County of San Diego, Department of Public Works.

C. For the duration of this project:

1. Comply with all applicable stormwater regulations at all times. The activities proposed under this application are subject to enforcement under permits from the San Diego Regional Water Quality Control Board (RWQCB) and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance (Ordinance No. 9424 and Ordinance No. 9426) and all other applicable ordinances and standards. This includes requirements for materials and wastes control, erosion control, and sediment control on the project site. Projects that involve areas greater than 1 acre require that the property owner keep additional and updated information onsite concerning stormwater runoff. This requirement shall be to the satisfaction of the Director of Public Works.

ADOPTION STATEMENT: This Mitigated Negative Declaration was adopted and above California Environmental Quality Act findings made by the:

DIRECTOR OF PLANNING & LAND USE

on July 7, 2006

JOSEPH FARACE, AICP, Planning Manager
Regulatory Planning Division

JF:FWB:jcr

cc: Donald A. Dreessen Trust, 719 South We Go Trail, Mt. Prospect, IL 60056
Hadley Johnson, William Karn Surveying and Engineering, 129 W. Fig Street, Fallbrook, CA 92028
Margarette Morgan, Chair, Bonsall Sponsor Group
Nael Areigat, Project Manager, Department of Public Works, M.S. O336
Flores Bishop, Land Use/Environmental Planner, Department of Planning and Land Use, M.S. O650

ND12-05\0302008-ND

or astronomical observations, because the project will conform to the Light Pollution Code (Section 59.101-59.115).

The project will not contribute to significant cumulative impacts on day or nighttime views because the project conforms to the Light Pollution Code. The Code was developed by the San Diego County Department of Planning and Land Use and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level

II. AGRICULTURE RESOURCES -- In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site contains a citrus and avocado grove and has land designated as Unique Farmland. As a result, the proposed project was reviewed by staff and was determined not to have significant adverse project or cumulative level impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use for the following reasons: The Department of Planning and Land Use conducted an analysis of the significance of the agricultural resources on site using

the LESA model. The LESA model analyzes soil resource quality, project size, water resource availability, surrounding agricultural lands and protected resource lands. The LESA model produced a very low score of 25.5, which is determined to a less than significant impact. The soils on the site are not rated as suitable for agriculture and there are no prime soils on the site. Therefore, this project would not result in infilling and a significant conversion of farmland resources to non-agricultural use would not occur. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is zoned A70, which is considered to be an agricultural zone. However, the proposed project will not to result in a conflict in zoning for agricultural use, because residential use is a permitted use in A70 zones and will not create a conflict with existing zoning for agricultural use. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, there will be no conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site contains a citrus and avocado grove and abuts to the north and west other land designated as Unique Farmland. As a result, the proposed project was reviewed by staff and was determined not to have significant adverse impacts related to the conversion of Unique Farmland to a non-agricultural use for the following reasons: The Department of Planning and Land Use conducted an analysis of the significance of the agricultural resources on site using the LESA model. The LESA model analyzes soil resource quality, project size, water resource availability, surrounding agricultural lands and protected resource lands. The LESA model produced a very low score of 25.5, which is determined to a less than

significant impact. The soils on the site are not rated as suitable for agriculture and there are no prime soils on the site. Therefore, this project would not result in infilling and a significant conversion of farmland resources to non-agricultural use would not occur. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project proposes development that was anticipated in SANDAG growth projections used in development of the RAQS and SIP. Operation of the project will not result in emissions of significant quantities of criteria pollutants listed in the California Ambient Air Quality Standards or toxic air contaminants as identified by the California Air Resources Board. As such, the proposed project is not expected to conflict with either the RAQS or the SIP. In addition, the project is consistent the SANDAG growth projections used in the RAQS and SIP, therefore, the project will not contribute to a cumulatively considerable impact.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

In general, air quality impacts from land use projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The San Diego County Air Pollution Control District (SDAPCD) has established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. For CEQA purposes, these screening-level criteria can be used as numeric methods to

Attachment G

Adjacent Property Ownership Information Obtained From County of San Diego Zoning Dept.

OBTAINED FROM
Co. of S.D. 9/27/10
ZONING DEPT.

Identify Results

Coordinate Position
Lambert Conformal Conic: 6286022, 2051688
Geographic: 33° 17' 37.3" N, 117° 9' 7.4" W

County Boundary2
OBJECTID: 1
TRANUM: 88888888
SHAPE_LENG: 1552328.27722
AREA: 118787852857.568
LEN: 1552328.27894896

Incorporated Areas
NAME: S.D. COUNTY
ORIG_FID: 14
AREA: 97653791846.9596
LEN: 2482919.44116642

Community Planning Area
CPA NAME: Bonsall
SPONSOR NAME: BONSALL
AREA_: 916310932.967
CPASG_LABE: Bonsall
AREA: 916310932.9758
LEN: 193088.286368319

Sponsor Groups
PERIMETER: 193088.285374
CPA NAME: Bonsall
SPONSOR GROUP NAME: BONSALL
AREA_: 916310932.967
CPASG_LABE: Bonsall

Parcels with out labels
APN: 1270710900
APN_8: 12707109
PARCELID: 695486
OWN_NAME1: GONZALES FAMILY TRUST 07-22-08
FRACTINT: 1
OWN_ADDR1: 3195 BLACKWELL DR
OWN_ADDR2: VISTA CA
OWN_ZIP: 92084
SITUS_JURIS: CN
SITUS_STREET: HIGHWAY 395
SITUS_ADDRESS: 0
LEGLDESC: SEC 24-10-3W*NWQ*ALL LY SWLY OF HWY&WID IN SEQ OF\
ASR_LAND: 158005
ASR_IMPR: 0
ASR_TOTAL: 158005
DOCTYPE: 2
DOCNMBR: 398499
DOCDATE: 072508
ACREAGE: 6.01
TAXSTAT: T
TRANUM: 57025
ASR_ZONE: 8
ASR_LANDUSE: 61
UNITQTY: 0
X_COORD: 6286015.63891376
Y_COORD: 2051620.39102597

MULTI:	N
OVERLAY_JURIS:	CN
SUB_TYPE:	1
NUCLEUS_ZONE_CD:	80
NUCLEUS_USE_CD:	610
AREA:	277804.773377273
LEN:	2627.56080441608