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Summary

A total of 210.4 acres of the Meadowood project site is actively farmed for citrus and avocado orchards. Over the past 60 years the site has been used for farming such crops as citrus, dry beans, avocados, gladioli bulbs, and barley crops. The properties in the project vicinity, support citrus, avocado, and field crop production, and contain several single-family residences. Land under the Williamson Act Contract exists within approximately one mile from the project site; however, none exists on-site.

The proposed project would convert approximately 160.6 acres of farmland currently in agricultural use to non-agricultural uses. The remainder, approximately 49.3 acres of citrus and avocado orchards would be retained in agricultural open space. Land to be converted would consist of 6.3 acres designated as Prime Farmland, 54.2 acres Farmland of Statewide Importance, 99.9 acres Unique Farmland, 11.5 acres of grazing land, and 43.1 acres Farmland of Local Importance.

The project site was analyzed using the California Agricultural Land Evaluation and Site Assessment (LESA) Model, which pursuant to Appendix G of the CEQA Guidelines, is intended “to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process,” (Public Resources Code Section 21095). The LESA Model generated a score of 40.8 for the project site as a whole, with the subscores for Land Evaluation and Site Assessment totaling 13 points and 27.8 points, respectively. The LESA Model requires that the Model score is greater than or equal to 40.0, plus both subscores are greater than 20 points for the site to be considered a significant agricultural resource. Therefore, the Meadowood site is not considered to be significant. ~~Although less than significant under the LESA Model, impacts associated with conversion of farmland are determined to be significant due to the loss of defined lands under the FMMP. Mitigation measures include the retention of 49.3 acres of existing citrus and avocado orchards.~~

The project will amend the Regional Land Use Map to change the designation for Meadowood from Special Study Area (SSA) and Rural Development Area (RDA) to Current Urban Development Area (CUDA). In addition, the Fallbrook Community Plan would be amended to change the site from (21) Specific Plan and (18) Multiple Rural Use to (21) Specific Plan for the entire project site. The area currently designated by the General Plan as (21) Specific Plan Area is zoned S90, Holding Area Use Regulation. The area currently designated (18) Multiple Rural Use Area is zoned A70, Limited Agricultural Use Regulation. The project would not result in significant impacts related to conflicts with the Fallbrook Community Plan, the California Land Conservation Act, or existing and planned land uses. The Meadowood project includes project design measures to reduce potentially significant impacts associated with residential/agricultural

interface incompatibility including the dedication of a 49.3 acre agricultural open space area and a 122.4 acre natural open space area to serve as a natural buffer between the residential uses proposed and the agricultural lands and sensitive biological communities to the east. Additionally, the project is required by the San Diego County Agricultural Enterprises and Consumer Information Ordinance to provide disclosure statements in all sales documentation for all proposed residential units, if agricultural use is still in existence at the time new homes are constructed. The statement would notify potential owners that the adjacent property could potentially be used for agricultural operations such as cattle ranching and that there could be associated issues such as odors, noise, and vectors.

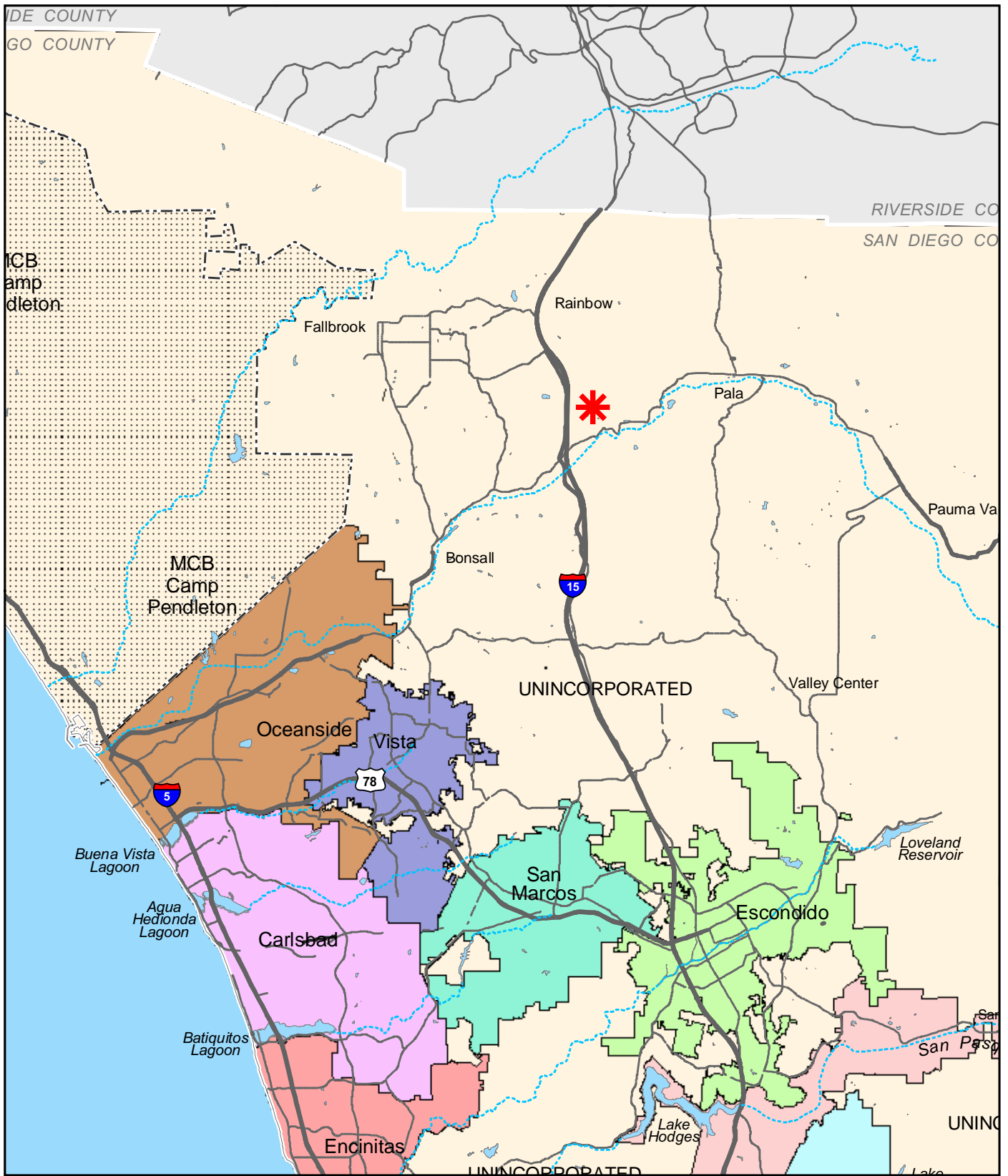
1.0 Introduction

1.1 Project Location

The Meadowood Specific Plan Area (SPA) is located approximately 45 miles north of downtown San Diego, 20 miles from the Pacific Ocean at Oceanside, about 13 miles from Temecula in Riverside County, and five miles south of the Riverside County line. More specifically, the 389.5-acre Meadowood project site (proposed project) is located east of Interstate 15 (I-15) and north of State Route 76 (SR-76) (Figure 1) in the unincorporated area of the County of San Diego within the Fallbrook Community Plan area (Figure 2). Pardee Homes proposes to develop a portion of Pankey Ranch located north of the San Luis Rey River, Section 36 of Township 10 South, Range 3 West on the Bonsall USGS 7.5-minute topographic quadrangle.

1.2 Site Description

The Meadowood project site occupies the eastern portion of a well-defined valley surrounded by steep hills. The site contains a variety of vegetation types and habitats as well as topographic features. The topography of the project site ranges from gently sloping, sparsely vegetated terrain approximately 280 feet above mean sea level (MSL) at the southwestern end of the site, nearest to the San Luis Rey River, to the steeply sloping ridgeline along the northeastern portion of the site, which is the southern flank of Monserate Mountain. The dominant features are Monserate Mountain, which runs along the eastern project boundary and Rosemary's Mountain (elevation 992 feet) which abuts the project boundary to the southeast. The eastern boundary descends into Rice Canyon, most of which is farther to the east. The site generally drains to the south and west and eventually into the San Luis Rey River. The project area currently supports active agricultural uses, primarily the production of citrus and avocados on a majority of the site.



 Project Location

FIGURE 1
Regional Location

1.3 Project Description

The project proposes the development of 844 residential units, both single- and multi-family, as well as 122.4 acres of natural open space, a park, and a school site. Additionally, the project proposes to retain 49.3 acres of the existing approximately 209.9 acres of agriculture (Figure 3) in the form of the citrus and avocado groves that would be retained as a biological and agricultural buffer. This buffer will create a separation between the project site and the sensitive biological communities and agricultural activities located to the east, which will minimize indirect impacts such as edge effects (discussed further in Sections 3.10 and 6.2). A wastewater treatment plant (WWTP) and wet weather ponds to provide wastewater services to the proposed project would be constructed within a two-acre area at the southernmost tip of Meadowood.

2.0 Regulatory Framework

This section discusses the following State and County agricultural regulations, plans, and policies and their relationship to the proposed project:

California Department of Conservation, Division of Land Resource Protection's Farmland Mapping and Monitoring Program (FMMP) - The goal of the Farmland Mapping and Monitoring Program (FMMP) is to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. FMMP produces *Important Farmland Maps*, which are a hybrid of resource quality (soils) and land use information. Agricultural lands are rated according to soil quality and irrigation status, with Important Farmland maps updated every two years based on aerial photograph review, computer mapping analysis, public input, and field reconnaissance.

California Land Conservation (Williamson) Act - The California Land Conservation Act of 1965, better known as the Williamson Act (California Administrative Code §51200 et. seq.), has been the state's premier agricultural land protection program since its enactment in 1965. The California Legislature passed the Williamson Act in 1965 to preserve agricultural and open space lands by discouraging premature and unnecessary conversion to urban uses. The act creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict land to agricultural and open space uses. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value, which saves landowners from 20 percent to 75 percent in property tax liability each year.

Contracts issued under the Williamson Act automatically renew each year for a new 10-year period, unless the landowner files a notice of non-renewal to terminate the contract at the end of the current 10-year period. During the 10-year cancellation period,

Figure 3, color/oversize

property taxes are gradually raised to the appropriate level for developable land. Agricultural preserves are generally intended to avoid areas where public utility improvements and related land acquisitions may be required. The Williamson Act does not specifically address the issue of compatible land uses in sites adjacent to agricultural preserves, other than to require that “[c]ities and counties shall determine the types of uses to be deemed ‘compatible uses’ in a manner which recognizes that a permanent or temporary population increase often hinders or impairs agricultural operations.” (California Administrative Code §51220.5).

San Diego County General Plan - The San Diego County General Plan (1996) is a comprehensive planning guide for unincorporated areas within the county. Related agricultural policies within the Regional Land Use, Open Space, and Conservation Elements as well as the Fallbrook Community Plan Area are summarized below:

1. **San Diego County General Plan, Regional Land Use Element** - The Regional Land Use Element regional categories for the Meadowood Project Site are SSA and RDA. The SSA designation is applied on an interim basis and for a specified period of time to areas in which development should be suspended or restricted pending completion of detailed review, study, or annexation to the County Water Authority. Lands within the RDA designation are outside the service boundaries of the County Water Authority. Areas within the RDA category are intended for agriculture or unimproved lands and remote pockets of residential development. The proposed Meadowood project is designated as an RDA since it is outside the County Water Authority boundary line. However, the Proposed Project proposes to designate the entire site as CUDA.
2. **San Diego County General Plan, Open Space Element** – It is the intent of the County General Plan Open Space Element to encourage the establishment of additional agricultural preserves and open space easements based on a systematic review of appropriate areas. Specifically, Section 2, Goal II(1) and (6) of the Element encourages “agricultural use of lands with soils which are highly suitable for the production of food or fiber” and “the use of agriculture to provide visually pleasing open space and variety within an urban environment.”

Agricultural preserves have been established throughout the county, which provide valuable open space. Procedures for acquiring agricultural preserves and open space easements are defined in San Diego County Board of Supervisors Policies I-38 and I-37, respectively.

3. **San Diego County General Plan, Conservation Element** – Policies and Action Programs related to agriculture in the Conservation Element include conducting an annual inventory of areas with high agricultural potential (including an assessment of the annual gain or loss of agricultural lands), amending the General Plan to include an Agriculture Element, identifying and implementing efforts to preserve agriculture

(e.g., encouraging additional preserves and publicizing the wildlife habitat preserve provisions of the Williamson Act), and incorporating the most detailed soil data available in environmental analyses.

The definition of agricultural lands is not based solely on soil characteristics. The Conservation Element states “the topic of soil is complex. The physical properties of soil are not necessarily the principal factor determining the agricultural suitability of a particular area. Climatic conditions, water availability, drainage, taxes and land development pressures are equally important.”

4. **Fallbrook Community Plan** – Fallbrook has a unique village atmosphere characterized primarily by low density residential development and agriculture. The general goal is to perpetuate the existing rural charm and village atmosphere while accommodating growth in such a manner that it will complement the environment of Fallbrook. The Fallbrook Community Plan designates the Meadowood site as (21) Specific Plan and (18) Multiple Rural Use.
5. **~~San Diego County~~ Local Agency Formation Commission (LAFCO)** – The proposed project would require LAFCO action and it is the policy of ~~the San Diego County~~ LAFCO to discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area or the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use. Therefore, because the proposed project may have a potential adverse impact on agricultural lands, ~~San Diego~~ LAFCO’s adopted procedures to define agricultural and open space lands would be followed.

LAFCO procedures include the following criteria that are considered when reviewing a proposal that could adversely affect agriculture and open space lands: (1) The use and value of the proposal area and surrounding parcels; (2) determination as to whether any of the proposal area is designated for agricultural preservation by adopted local plans, including Local Coastal Plans and the County Agricultural Element; (3) determining whether public facilities would be extended through or adjacent to any other agricultural lands to provide services to the development anticipated on the proposal property; (4) determining whether the proposal area is adjacent to or surrounded by existing urban or residential development; (5) determining whether surrounding parcels may be expected to develop to urban uses within the next five years; and (6) determining if natural or man-made barriers would serve to buffer the proposal area from existing urban uses.

6. **I-15/Highway 76 Interchange Master Specific Planning Area (MSPA)** – On June 1, 1988, the Board of Supervisors approved the MSPA amendment to the Fallbrook Community Plan. The Interstate 15 Corridor Subregional Plan extends

approximately 20 miles from the Escondido City limits to the Riverside County Line. It contains the viewshed area ranging from one-half acre to two miles in width on either side of the freeway. The intent of the plan is to promote orderly development, protect environmental and manmade resources, and implement the County's objectives for growth management and governmental structure for the region.

The MSPA encompasses 1,086 acres of land located within the four quadrants of the I-15/SR-76 Interchange and includes eight property owners. The MSPA proposed an overall residential density of 0.81 dwelling unit per acre with a maximum of 956 dwelling units.

7. **San Diego County Zoning Ordinance** – The San Diego County Zoning Ordinance provides regulatory provisions. These provisions apply to all areas of the Meadowood Specific Plan Area and regulate buildings or structures and the construction, reconstruction, alteration, expansion, or relocation of any building, structure, or use on the site. The Zoning Ordinance regulates land use by designating zones to identify permitted uses based on present and potential conditions. Specific criteria regulated through zoning include animal regulations (i.e., controls on the keeping of various types of animals), development density, lot size, building types and dimensions, setbacks, and open space requirements. Zoning categories are designed to be consistent with land use designations described in both the General Plan and Community Plan. The current zoning on the western 92 acres is S90, Holding Area Use Regulations, which require a net minimum lot size of 20 acres. The current zone on the eastern 298 acres is A70, Limited Agriculture, Use Regulations, which require a net minimum lot size of two acres.
8. **County Board of Supervisors Policy I-38** – The County Board of Supervisors is committed to supporting and encouraging farming in San Diego County through establishment of partnerships with landowners and other stakeholders to identify, secure, and implement incentives that support the continuation of farming as a major industry in San Diego. Specific elements of this policy include criteria for preserve establishment (e.g., eligibility and size), terms (i.e., contract duration), renewal/non-renewal and cancellation, as well as provisions for implementing eminent domain and fee/tax schedules.
9. **San Diego County Agricultural Enterprises and Consumer Information Ordinance, §63.401 et seq.** - This ordinance recognizes that the commercial agricultural industry in the county of San Diego is a significant element of the County's economy and a valuable open space/greenbelt resource for San Diego County residents. The ordinance also recognizes that a majority of agricultural operations within the county are family operated, and are located throughout the unincorporated area. To further this purpose, this ordinance recognizes that conflicts can occur between agriculture and certain other land uses, and it defines and limits the circumstances under which agricultural enterprises activities, operations, and

facilities constitute a nuisance. The ordinance requires that sellers of real property in unincorporated areas inform prospective buyers that the property could potentially be near an agricultural operation and may experience related inconveniences, irritations, and discomforts. These conditions include, but are not limited to, noise, odors, dust, insects, rodents, and chemicals.

3.0 Environmental Setting

3.1 Land Use Designations and Zoning

The goals and policies that provide the overall policy framework for Meadowood are the San Diego County's General Plan, Regional Land Use Element, Fallbrook Community Plan, the I-15 Corridor Design Review Guidelines, and the Interstate 15/Highway 76 Master Specific Plan. The Meadowood project site is currently within both a SSA and RDA on the Regional Land Use Element Map. The SSA category is applied on an interim basis until the completion of a detailed review, study, or annexation. Lands within the RDA category are intended for agricultural or unimproved lands and remote pockets of residential development.

As part of this project, the Regional Land Use Map is proposed to be amended to designate Meadowood as a CUDA. The CUDA category is intended for near-term urban development and the SSA and RDA categories would be removed from the site. The Fallbrook Community Plan area, which designates Meadowood as (21) Specific Plan and (18) Multiple Rural Use, is proposed to be amended to allow for the development of a comprehensive Specific Plan Amendment by designating the entire 389.5-acre project area as (21) Specific Planning Area (Figure 4). This would allow for the preparation of a Specific Plan with a density of 2.5 units per acre, resulting in a maximum of 900 886 dwelling units.

The area currently designated by the General Plan as (21) Specific Plan Area is zoned S90, Holding Area Use Regulation. The area currently designated (18) Multiple Rural Use Area is zoned A70, Limited Agricultural Use Regulation (Figure 5). The southwestern 92 acres of the project area are within the Interstate 15/Highway 76 Interchange Master Specific Plan Area (MSPA), which has been incorporated into the Fallbrook Community Plan. Development proposals within the MSPA must file a Specific Plan Amendment as part of a development application. The allowable overall density of the MSPA is 0.81 dwelling unit per acre, but the subject property within the MSPA is called out specifically to allow a density of 2.75 dwelling units per acre, thus allowing an additional 253 dwelling units.

Figure 4, color

Figure 5, color

3.2 Williamson Act Contract Lands

The California Land Conservation Act of 1965, also referred to as the Williamson Act, is an agricultural protection program that currently protects more than 16 million of the State's 30 million acres of farm and ranch land. Under the act, a private landowner may voluntarily enter into a rolling term 10-year contract with the local government for the purpose of restricting specific parcels of land to agricultural or compatible open space use. Lands must be located within an agricultural preserve area and be a minimum of 100 acres in size, unless the local government authorizes a smaller size (California Department of Conservation 2005). The project site is not currently, nor historically, been within a designated Agricultural Preserve. Additionally, this project site's land is not under a Williamson Act contract, but there is a Williamson Act Contract on the McCarthy Family Trust land (Williamson Act Contract #75-60; Preserve #15). This contract is not adjacent to the project site, however, and is located approximately one mile southeast of Meadowood and south of the San Luis Rey River.

3.3 Important Farmland Map Category

The Farmland Mapping and Monitoring Program (FMMP) is implemented by the State Department of Conservation, Division of Land Resource Protection, and recognizes the suitability of land for agricultural production. The FMMP is non-regulatory and was developed to inventory land and provide categorical definitions of important farmlands and consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. The program does not necessarily reflect local General Plan actions, urban needs, changing economic conditions, proximity to market and other factors that may be taken into consideration when government considers agricultural land use policies. *Important Farmland Maps*, which are a hybrid of resource quality (soils) and land use information, are produced by the FMMP. In addition, data is released in statistical formats--principally the biennial *California Farmland Conversion Report* (California Department of Conservation 2004).

Maps are updated every two years. The last statewide update was completed in 2002 and reflects land use changes to agriculture through the year 2004. Figure 6 shows the most recent farmland data within the project site and surrounding area. These include lands designated as Prime and Unique Farmlands, Farmland of Statewide and Local Importance, Grazing Land, Urban and Built-up, and Other Land (California Department of Conservation 2004).

The U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) has published a soil survey for the San Diego area. The survey is used to determine the location and significance of Important Farmlands as mapped on Figure 6.

Figure 6, color

Farmland categories are based on soil types, current use of the land, and availability of irrigation water.

The Important Farmland Map Categories and the acreage of the FMMP categories present on the project site are described below.

3.3.1 Prime Farmland

Prime Farmland has the most favorable combination of physical and chemical features, enabling it to sustain long-term production of agricultural crops. This land possesses the soil quality, growing season, and moisture supply needed to produce sustained high yields. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to Natural Resources Conservation Service (NRCS) mapping. The project area contains 6.3 acres designated Prime Farmland. All of the Prime Farmland on-site would be converted to non-agricultural uses by the implementation of the proposed project.

The U.S. Department of Agriculture's Land Inventory and Monitoring (LIM) Project sets forth the soil criteria in units for the mapping of Prime Farmlands in San Diego. The Prime Farmland Soil criteria for the Fallbrook Community Plan area is slopes of sandy loam with a 2 to 5 percent and 5 to 9 percent slopes (Soil Survey of San Diego Area, California, December 1973, as revised 1995).

3.3.2 Farmland of Statewide Importance

Farmland of Statewide Importance is similar to Prime Farmland; however, it possesses minor shortcomings, such as greater slopes and/or less ability to store moisture. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to NRCS mapping. The project site contains approximately 54.2 acres designated Farmland of Statewide Importance, about 2.9 percent of the total project footprint. All of the land within this designation would be converted to non-agricultural uses as a result of the proposed project.

3.3.3 Unique Farmland

Unique Farmland is of lesser quality soils used for the production of the state's leading agricultural crops. Unique Farmland includes areas that do not meet the above stated criteria for Prime Farmland or Farmland of Statewide Importance, but that have been used for the production of specific high economic value crops during the two update cycles prior to the mapping date. It has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained high quality and/or high yields of a specific crop when treated and managed according to current farming methods. This land is usually irrigated, but may include non-irrigated orchards or

vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. The project site contains approximately 147.6 acres designated as Unique Farmland, of which 99.9 acres would be converted to non-agricultural uses as a result of the proposed project.

3.3.4 Farmland of Local Importance

Farmland of Local Importance is important to the local agricultural economy, as determined by the County Board of Supervisors and a local advisory committee. The County of San Diego defines Farmland of Local Importance as land with the same characteristics as Prime Farmland or Farmland of Statewide Importance with the exception of irrigation. Approximately 43.1 acres of the project area is designated Farmland of Local Importance, all of which would be converted to non-agricultural uses as a result of the proposed project.

3.3.5 Grazing Land

Grazing Land is land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres. Approximately 136.3 acres of the project site is designated Grazing Land. Of this, approximately 11.5 acres will be converted to non-agricultural uses.

3.3.6 Urban and Built-up Land

This classification consists of land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. Currently, there is no land designated as Urban and Built-up in the project area.

3.3.7 Other Land

Other Land consists of land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40

acres is mapped as Other Land. There is approximately 1.0 acre of land designated as Other Land in the project site.

Table 1 depicts the approximate acreage for each of the FMMP categories within the project site and shows them as a percentage of the total project site. According to the Important Farmlands Inventory Map, lands within the Meadowood project site contain Unique Farmland, Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Other Land. Unique Farmland and Grazing Land comprise the majority of the project site.

**TABLE 1
ACRES OF FMMP FARMLAND ON-SITE AND
AS A PERCENT OF THE ENTIRE PROJECT AREA**

Category	Total Acres	Total Percent of Project Area
Farmland of Statewide Importance	54.2	13.9
Farmland of Local Importance	43.1	11.3
Grazing Land	136.3	35.0
Other Land	1.0	0.2
Prime Farmland	6.3	2.9
Unique Farmland	147.6	37.9
TOTAL	389.5	100.0

3.4 Land Use

3.4.1 Existing On-Site Land Use

Most of the Meadowood site (approximately 209.9 acres) is currently and has historically been committed to various agricultural activities, with extensive areas supporting citrus and avocado orchards occupying the lower and mid-portions of ridges and slopes in the central portion of the site. These areas are irrigated, and the trees are maintained by periodic trimming, pruning, and replanting. The southern portion is used to grow seasonal crops. According to the Cultural Resources Survey of the property (ASM 2005), there are five residences, one cinder block building historically used to house workers, and four outbuildings used as garages or for storage. All of these buildings appear to be associated with the agricultural operation or are residences for the property owners.

There is a steep and rugged ridgeline that trends north-south along the eastern portion of the property. The ridgeline separates the agricultural areas from the northeastern and eastern areas of the site which contain primarily undisturbed native vegetation such as chaparral and coastal sage scrub.

3.4.2 Agricultural History

The Meadowood property was originally part of the Mexican land grant of Rancho Monserrate granted to Don Ysidro María Alvarado by Governor Pío Pico in 1846. From the 1870s through the 1920s, the property was part of a rural farming community typical of its time. Pioneer farmers of this era typically settled the river valley bottom lands and established communities tied together through a common school district, church, post office, and country store. Wheat became the chief crop during the initial settlement of the San Diego area, but experimental cultivation in the 1860s and 1870s found crops such as olives, oranges, and grapes that could be successfully grown and marketed. Fruit production quickly spread and by the end of the decade had become a major product. However, farmers in the area raised a large number of diverse crops with water taken from the San Luis Rey River in small ditches such as corn, pumpkins, alfalfa, sweet potatoes, and truck crops (ASM 2005).

The property changed hands numerous times until the 1930s when Charles Cooper purchased the (then) 3,000-acre property and invested a quarter of a million dollars in transforming it into a race horse breeding ranch. The San Luis Rey Ranch contained two half-mile tracks for exercising and training as well as alfalfa fields, barns, paddocks, living quarters for workers, and the ranch house where Charles and his wife lived. With the boom in the racing industry, San Luis Rey became a well known thoroughbred farm. When horse racing was put on hold in the 1940s because of World War II, the ranch began losing money and Cooper was forced to sell in 1943 (ASM 2005). The brothers Robert and Edgar Pankey obtained the farm in 1946. The project site has been farmed by the Pankey family for more than 60 years. Throughout this time, citrus, dry beans, avocados, gladioli bulbs, and barley crops have been produced with varying levels of success. Dry beans (blackeye), barley, Valencia orange, and tangerine crops have been grown on particular acres as well (Copley International Corporation [CIC] 1980).

3.4.3 Surrounding Land Use

The properties adjacent to the project site are zoned for agriculture, support citrus, avocado, and field crop production, and contain several single-family residences (Figure 7). The project site is situated adjacent to several planned and approved projects: the Campus Park SPA (currently used for cattle grazing) lies immediately adjacent to the west, along with the approved Palomar College Campus site. The Campus Park West property lies between Campus Park and I-15. Bordering the site on the southeast is the approved Rosemary Mountain Rock Quarry. To the north is undeveloped land consisting of abandoned pastures, citrus and avocado orchards, and natural open space. Northeast of the project site, located along Rice Canyon Road, are various small scale agricultural operations and rural residential land uses. Additional parcels (planted to field crops) under Pankey ownership but that are not part of the Meadowood project are located to the south.

Figure 7, color/oversize

The Fritz Family property occupies most of the relatively flat canyon floor to the east of Rice Canyon Road east of the project site (see Figure 7). This operation primarily grows truck crops. Avocado groves exist farther east. Pala Rey Ranch (McCarthy Family property) lies southeast of the project site, south of SR-76, and on both sides of Couser Canyon Road. The ranch headquarters is surrounded by a pasture that is seasonally grazed by cattle. The San Luis Rey Ranch (McCarthy Family property) is located to the east and west of Couser Canyon Road. There is no urban or built-up land in the project's vicinity. The closest urban areas lie west of I-15 and south of Pala Road.

The Pala Preserve (Preserve #15) is located east and southeast of the eastern project boundary and encompasses the Fritz Family property along Rice Canyon Road. Part of the Pala Preserve also has a Williamson Act Contract in effect. The McCarthy Family Trust (Williamson Act Contract #75-60) parcels that comprise the San Luis Rey Ranch operation located along both sides of Couser Canyon Road south of the river are also part of the preserve.

3.5 Climate

The project area, like the rest of San Diego County's inland valley areas, has a warm summer Mediterranean climate characterized by warm, dry summers and mild, wet winters. The mean annual temperature for the project area is 74 degrees Fahrenheit (F). The average annual precipitation is 13 inches, falling primarily from November to April. Winter low temperatures in the project area average about 44 degrees F, and summer high temperatures average about 81 degrees F (Weather.com 2006). Cool air drains into the valley from the surrounding hillsides. Frost often settles on the valley floor between the beginning of November and the end of March. Actual and potential freeze hazards restrict the growing season from 210 to 250 days. The project site is located in the "transitional" plant climate zone (University of California Extension 1970). Although soils are relatively poor for agricultural production, climatic conditions are favorable for a select set of crops such as avocados and citrus.

3.6 Soils

The U.S. Department of Agriculture Soil Conservation Service, replaced by the Natural Resources Conservation Service (NRCS) in 1994, developed a system to generally classify soil types. The land capability classification describes soil types, their physical characteristics and limitations, and their suitability for agriculture and other uses. The SCS grouped soils according to their general suitability for most kinds of field crops. The capability system groups all soils into three levels: the capability class, subclass, and unit. The capability class is designated by Roman numerals I through VIII. The numbers indicate progressively greater limitations and narrower choices for practical use. Soils with few limitations that restrict their use for agriculture are placed in Capability Class I.

Soils with very severe agricultural limitations, which would affect management or choice of crop, are placed in Capability Class IV. Some soils have limitations that render them agriculturally impractical, and are placed in Classes V through VIII.

Capability subclasses, of which there are four, are soil groups within one class. Adding a small letter, e, w, s, or c, to the class numeral, for example, I-e, designates them. The letter e shows that the main hazard is the risk of erosion; w shows that water in or on the soil interferes with plant growth or cultivation; s shows that the soil is limited mainly because it is shallow, droughty, or stony; and c, used in only some parts of the United States, shows that climate, either very cold or very dry, is a limiting factor. According to the Williamson Act (California Government Code Section 51201[c]), soils in capability groups I and II are classified as “prime” soils. There are about 26,700 acres of Class I and 104,930 acres of Class II soils in San Diego County.

Capability units are soil groups within a subclass, which further define soil characteristics and/or limitations to their use. Adding an Arabic numeral to the subclass symbol, for example, IIe-4 and IIIe-6, generally designates capability units. Thus, the Roman numeral designates the capability class, or degree of limitation; the small letter indicates the subclass, or kind of limitation, and the Arabic numeral specifically identifies the capability unit within each subclass. These units are not given in all soil surveys.

The Storie Index provides another way to classify the value of agricultural soils. The Storie Index numerically expresses the relative degree of suitability and grade of a soil for intensive agriculture based on soil characteristics. Soils of grade 1 (i.e., index rating of 80 to 100) have few or no limitations restricting their use for crops. At the other end of the scale, grade six (i.e., index rating of less than 10) consists of soils that generally are not suited to farming. Storie Index Ratings of 80 and above give a soil the designation of Prime Agricultural soil.

The spatial distribution of soil types/units on the project site is shown in Figure 8 (SANDAG GIS Data 2004). These soils have been rated for agricultural capability. The on-site soils and their associated acreages, capability units, and Storie Index ratings are shown in Table 2. Their characteristics are taken from the USDA soil surveys for San Diego County (USDA 1973). An asterisk (*) next to the soil type indicates a Prime Farmland soil. A carrot (^) next to the soil type indicates a soil of Statewide Importance. Approximately 60.5 acres of the western portion of the project site contain soils that qualify for the Prime Farmland or Statewide Importance Farmland designations.

As indicated in Table 2, soils on the project site are diverse in capability and unit crop suitability. Of the eight capability classes, Classes I and V are absent from the project site. Class II soils comprise 14.45 acres of the project site, which have moderate limitations that restrict the choice of plants or that require moderate conservation practices. These soils consist of two types of Wyman Loam (10.82 acres), located in a small pocket along the northeastern border, and Grangeville fine sandy loam

Figure 8, color

**TABLE 2
ON-SITE SOIL RESOURCES**

Soil Type/ Symbol	Soil Description	No. of Acres	Capability Unit	Storie Index
AvC ^	Arlington coarse sandy loam, 2 to 9 percent slopes	9.98	IIIe-8 (19)	47
CmrG	Cienaba very rocky coarse sandy loam, 30 to 75 percent slopes	16.70	VIIIs-8 (19)	<5
FaC2 ^	Fallbrook sandy loam, 5 to 9 percent slopes, eroded	6.68	IIIe-1 (19)	51
FaE2	Fallbrook sandy loam, 15 to 30 percent slopes, eroded	10.71	VIe-1 (19)	35
GoA *	Grangeville fine sandy loam, 0 to 2 percent slopes	3.65	IIw-2 (19)	81
LpD2	Las Posas fine sandy loam, 9 to 15 percent slopes, eroded	28.54	IVe-1 (19)	33
LpE2	Las Posas fine sandy loam, 15 to 30 percent slopes, eroded	44.80	VIe-1 (19)	26
LrG	Las Posas stony fine sandy loam, 30 to 65 percent slopes	196.32	VIIe-7 (19)	8
RaC ^	Ramona sandy loam, 5 to 9 percent slopes	29.79	IIIe-1 (19)	58
RaD2	Ramona sandy loam, 9 to 15 percent slopes, eroded	0.85	IVe-1(19)	48
StG	Steep gullied land	7.56	VIIIe-1 (19)	<10
TuB ^	Tujunga sand, 0 to 5 percent slopes	0.78	IVs-4 (19)	39
WmB *	Wyman loam, 2 to 5 percent slopes	0.95	Ile-1 (19)	81
WmC ^	Wyman loam, 5 to 9 percent slopes	9.87	Ile-1 (19)	77
WmD	Wyman loam, 9 to 15 percent slopes	22.13	IIIe-1 (19)	69
Total Acres		389.30		-

*Prime Farmland Soil.

^Farmland of Statewide Importance Soil.

(3.65 acres) located on the southernmost tip of the project boundary. Wyman soil is used for citrus, truck crops, tomatoes, flowers, and range.

Another moderately large portion of the project site is Las Posas Fine Sandy Loam, 9 to 15 percent slopes, eroded, soil in Class VI. This soil comprises 28.54 acres close to the western project boundary north of the center. Class IV soils have very severe limitations that restrict the choice of plants or that require very careful management, or both. Capability Steep Gullied Land (StG) comprises 7.56 acres of the project site. This soil is in class VIII, with a steep landform and limitations that preclude commercial plant production, restricting its use to recreational purposes, wildlife habitat, watershed, or aesthetic purposes. The northeast portion of the project site is Las Posas stony fine sandy loam, with 30 to 65 percent slopes, which comprises approximately 196.32 acres and is a Class VII soil. Class VII soils have very severe limitations that make it unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat. Approximately 44.80 acres of Las Posas fine sandy loam with 15 to 35 percent slopes, eroded, occupies the central portion of the project site. This soil type is of Class VI, which has severe limitations that make it generally unsuitable for cultivation and that also restrict uses mainly to pasture, rangeland, forestland, or wildlife habitat.

3.7 Water

3.7.1 Water Supply

The Project Site is currently irrigated with groundwater from on-site wells. No imported public water or waste water services are supplied to the site. The project will use recycled water for irrigation purposes as a means of reducing its need for imported water. Wastewater from the development will be treated to recycled water quality standards at the project's water recycling plant, and will be used on-site for irrigation of the project's common area landscaping, slopes, park, school field, and the retained citrus and avocado groves.

3.7.2 Water Quality

The Meadowood project area is underlain by both the western portion of the Pala Groundwater Basin and the eastern portion of the Bonsall Groundwater Basin. Water data is periodically gathered for both basins by the San Luis Rey Municipal Water District from monitor wells, one of which is in close proximity to the southeastern corner of the project site. The water quality of the groundwater in the Pala and easternmost Bonsall Groundwater Basin is characterized by relatively high total dissolved solids (TDS) concentrations. TDS is a measure of water's salinity and is expressed in terms of milligrams per liter or mg/l. TDS concentrations have been reported to be over 1,000 milligrams per liter (mg/l) for the Bonsall Groundwater Basin, and are generally at or

below 1,000 mg/l for the Pala Groundwater Basin. The average TDS concentration for the Pala and Bonsall Basins is estimated to be 600 and 1,200 mg/l respectively. Chloride and sulfate concentrations are typically at or above secondary maximum contaminant levels (MCLs) (San Luis Rey Municipal Water District 2006).

Water with a TDS greater than 500 mg/l is problematic to many of the subtropical crops grown in San Diego County because they do not produce well and irrigation management is more difficult when irrigated with high TDS water. Water with a TDS greater than 1,000 mg/l becomes problematic even for industrial uses and is virtually unusable for many crops (San Diego County Water Authority, Agricultural Water Management Plan). The project proposes the use of recycled water to irrigate the avocado groves that would be preserved. Recycled water can have up to 300 mg/l more TDS than non-recycled water. However, the wastewater technical report (RW Beck, 2009) states that the TDS concentration within the recycled water to be used for irrigation is expected to be between 900 and 1050 mg/l, which is lower than the Bonsall Groundwater Basin Plan requirement of 1,500 mg/l. Therefore, the proposed primary source of irrigation water for the agricultural open space easement will actually have improved water quality over existing groundwater use that has sustained the avocado orchards for more than 25 years. Consistent with current avocado irrigation system operations, additional water will be used as necessary to leach the soils and prevent accumulation of salts. Furthermore, as irrigation demand in the summer months exceeds WWTP effluent supply, it will likely be necessary to supplement with a potable water supply containing TDS concentrations below 700 mg/l. This water would be blended with the WWTP effluent to further improve the quality of irrigation water.

Research regarding the effect of TDS within irrigation water used on agricultural crops has shown that higher concentrations may result in lower crop productivity. However, the effect of TDS is directly dependent upon the type of agricultural crop being irrigated. According to the Irrigation Water Quality Standards and Salinity Management Strategies completed by the Texas Cooperative Extension, irrigation water with a TDS concentration of 1,100 mg/l will result in approximately 75 percent avocado crop productivity.

Based on the improved irrigation water quality and sufficient crop productivity, it is expected that the proposed method of irrigation will continue to support long-term viability of avocado orchards within the agricultural open space easement.

3.8 Crop Suitability

Crop suitability for a parcel of land depends on the combination of soil, water, and climate resources on the parcel. Climatic conditions allow agricultural production to occur year-round in most areas of western San Diego County; that is, the Coastal Plains

and the Foothills. However, the project site lies on the edge of the transitional climate zone and oceanic influences are minimal. Therefore, the frost-free growing season is only between 250 and 300 days long (CIC 1980). Elevations range from 265 feet AMSL to approximately 818 feet AMSL along the southern flank of the Monserate Mountains (NRC 2005).

Currently, the majority of the project site, approximately 209.9 acres of the 389.5-acre project site, is involved in the active production of agriculture, primarily citrus and avocado because they are suited to growing on the steep slopes that are less susceptible to the frost that usually settles within the valleys. Citrus is less sensitive to frost and slow permeability than avocados but is more difficult to manage on steeper slopes. Citrus is commonly grown on nearly level to moderately steep soils. Of the citrus crops, the parcel is most suited to oranges and grapefruit, as lemons are adapted to the cooler climates found near the ocean.

3.9 Site Limitations

While water places few limitations on agricultural production on the site, climate and soils somewhat restrict production options as a freeze hazard exists between the first of November and the end of March and most of the soils are only of below average to average quality. Spring and winter harvest crops are limited and even citrus and avocados will need frost protection devices such as wind machines or smudge pots during some winter nights. However, the soil restriction is a very minor one, as much of San Diego County agriculture is climate oriented (i.e., tending toward the production of crops that require a specialized climate, but that do well on the poor soils typically found on hillsides if the climate is favorable). The major crops grown in the region are avocados, citrus, truck crops, tomatoes, and flowers. The climate, soils, and topography on the project site are very suitable for citrus groves and are especially suited to grow avocados, as they do well on the hillsides which make up a large portion of the project site's landscape.

3.10 Agricultural Interface

As discussed, the site has a long history of growing avocados and citrus, along with certain bean types and bulbs. Additionally, various agricultural productions occur within four miles of the project vicinity. Existing and surrounding land uses as well as historical agricultural uses are discussed in Section 3.4 and shown on Figure 7. The nearest agricultural operations consist primarily of citrus orchards, avocado groves, and indoor and outdoor flower crops. These agricultural operations and uses likely perform all or some of the following: cultivation; plowing; spraying; pruning; harvesting; and drying; which may generate dust, smoke, noise, pests (i.e., insects, rodents, etc.), odor, and the

use of pesticides. Potential interface impacts associated with the agricultural operations on the Fritz Family properties along Rice Canyon Road to the east and the field crop operations under Pankey ownership to the south are discussed in the following sections.

3.10.1 Odors, Noise, and Vectors

Agricultural production includes practices that may conflict with urban uses of adjacent land. Therefore, close proximity of urban land uses to agriculturally productive land may inhibit that agricultural production. Buffer zones located between urban and agricultural land will help to minimize the adverse impact that urban development can have on nearby agricultural production.

3.10.2 Site Contamination

The Department of Agriculture, Weights and Measures (DAWM) in the County of San Diego inventories pesticide use per land parcels. The agricultural chemical products used on the project site or within a four-mile radius of the project site within the last three years include the following (County of San Diego 2005a):

- Clean Crop Diazanone AG600 WBC
- M-Pede Insecticide
- Insecticidal Sosp 49.52 CF
- Pursuit Herbicide
- NO FOAM B
- Agri-Mek 0.15 EC Miticide/Insecticide
- Nu-Lure Insect Bait
- Diphacin rat and ground squirrel grain bait
- MON-35085
- MON-65005
- Roundup Pro Herbicide
- CLEAN CROP MALATHION 8E INSECTICIDE
- Leffingwell Supreme 415 Oil
- Omni Supreme Spray
- Princep Caliber 90 Herbicide
- Simazine 90-DF
- Wilco

A Phase I and limited Phase II hazardous materials investigation was conducted for the project site (Converse Consultants 2002). The investigations performed as part of the Phase I and Limited Phase II found that portions of the site were used for storage of tractor transmission parts and agricultural equipment and another portion used for the storage of pesticides, nutrients, and insecticides within aboveground storage tanks (ASTs). Additionally, as part of those investigations, Converse consulted with the San Diego Regional Water Quality Control Board, and the San Diego County Department of Environmental Health, Hazardous Materials Management Division, and the DAWM. No concerns were noted. A minor violation was filed at the DAWM for incorrect labeling and a lack of protective equipment for farm workers. This violation was corrected and there are no other violations or concerns on record at the DAWM. Smudge pots were also used on-site for the citrus operations and hydrocarbons were found on and around the storage area, but were deemed to be of low toxicity.

In summary, the construction of the project has the potential to emit hazardous materials through excavation and disposal of potentially hazardous materials from the site's past agricultural uses. However, the results of the ESA found the concentration of total petroleum hydrocarbons (TPH) on-site to be of low risk, and the project will address potential impacts to hazards by incorporating project design features prior to the development of the project or land acquisition to further reduce risks of hazardous materials (Table 1-5 of the draft EIR).

4.0 Guidelines of Significance

For the purpose of this report, a significant impact to agricultural resources would occur as a result of project implementation if:

1. The project will convert California Department of Conservation (CDC) designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural use.
2. The project would place or establish non-permitted uses in existing agricultural zones or on Williamson Act contract lands.
3. The project will involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.
4. The project would conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

5.0 Methodology

The methodology used in this analysis includes the following steps in the analysis:

- Reviewing or using the following informational sources or documents: (1) CDC FMMP data bases; (2) Williamson Act contract records; (3) soil data bases (4) Phase I or II Environmental Site Assessment reports; (5) topographic quadrangle maps; (6) cultural resources reports; (7) aerial photographs; and (8) San Diego County General Plan, Community Plan, and Zoning Ordinance documents.
- Utilizing the California Land Evaluation and Site Assessment (LESA) Model pursuant to the California LESA Model Instruction Manual to evaluate and quantify the direct impacts that would result from project implementation, such as conversion of active agricultural lands and mapped farmland categories to a non-agricultural use.
- Indicate the percentage (or acreage) of significant agricultural lands, farmland, agricultural preserves, Williamson Act contract lands, and Important Farmland Map Categories to be converted to a non-agricultural use by the proposed development.
- Evaluate Williamson Act contract, agricultural preserve, or agricultural zoning conflicts.
- Evaluate indirect impacts on-site and off-site as a result of project implementation, and determine whether agricultural conversion will occur indirectly.
- Discuss the agriculture interface impacts that the project may have on surrounding agricultural resources and/or operations; determine whether agricultural conversion will occur as a result of these impacts and whether existing operations will be limited by the proposed project; describe the extent to which operations have been limited; and discuss any natural features such as bluffs, dense landscaping, or elevation changes that may help to reduce agriculture interface conflicts.

The cumulative impact analysis for agriculture defines the geographic scope of the cumulative impact study area and includes a discussion of the reasoning and justification for the chosen boundaries of the cumulative impact study area. This report analyzes the significance of any agricultural conversion on a cumulative level pursuant to CEQA Guidelines (§15130 and 15355).

This agricultural report discusses in detail any feasible mitigation measures that would reduce anticipated significant impacts to levels below significance, and where

appropriate, discusses any environmental design considerations. Finally, the report makes a clear statement indicating, whether the project will result in a significant adverse direct, indirect, or cumulative impact on agricultural resources and whether the impacts can be mitigated to a level below significance; recommends mitigation; and includes a brief summary conclusion.

6.0 Analysis of Project Effects and Significance Determination

6.1 Direct Impacts (Guidelines 1 and 3)

6.1.1 Evaluation Using the LESA Model

As noted above in Section 5.0, the LESA Model analysis was performed in order to assess potential direct agricultural impacts from implementation of the proposed project including the loss of Important Farmland Designations. LESA is a term used to define an approach for rating the relative quality of land resources based upon specific measurable features. The formulation of a California Agricultural LESA Model is the result of Senate Bill 850, which charges the Resource Agency, in consultation with the Governor's Office of Planning and Research, with developing an amendment to Appendix G of the California Environmental Quality Act (CEQA) Guidelines concerning agricultural lands. The use of this model is based on the associated 1997 California Agricultural LESA Model Instruction Manual (http://www.consrv.ca.gov/DLRP/qu_lesa.htm). This manual, pursuant to Appendix G of the CEQA is intended "to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process," (Public Resources Code Section 21095).

The California LESA Model is composed of six different factors. Two Land Evaluation (LE) factors are based upon measures of soil resource availability. Four Site Assessment (SA) factors provide measures of a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, each of these factors is separately rated on a 100-point scale. The factors are then weighted relative to one another and combined, resulting in a single numeric score for a given project, with a maximum attainable score of 100 points. It is the project score that becomes the basis for making a determination of a project's potential significance, based upon a range of established thresholds. The results of the LESA analysis are detailed below.

6.1.1.1 Land Evaluation Score

Each soil type within the project boundary was mapped and identified by acreage and percent of the entire project area (389.5 acres). The Land Capability Classification (LCC) rating and Storie Index were then calculated based on the scoring system established in the LESA model and the “Soil Survey: San Diego Area, California” (1973). The LCC Score and Storie Index Score were then calculated by multiplying the LCC Rating and Storie Index by the proportion of the project area by soil type. As shown in Table A-1 of Appendix A, the total LCC Score equaled **27.75** and the total Storie Index Score equaled **24.34**. Each of these scores represents 25 percent of the weighted factor rating in the LESA Model, with resulting scores of 6.9 for the Land Capability Classifications and 6.1 for the Storie Index ratings.

6.1.1.2 Site Assessment Score

Project Size Score

Each soil type was classified by the corresponding LCC for that soil. Soils were grouped by the following basis: LCC Class I and II Soils, LCC Class III Soils, and LCC Class IV through VIII. Each classification was given a corresponding score based on the total acreage of grouping (Table A-2 of Appendix A). The LESA Model project size scoring system requires the use of the highest group score. The highest score and therefore the project size score for the project was the classification LCC Class IV-VIII which equaled 80. The final score of 80 represents 15 percent of the weighted factor rating in the LESA Model, resulting in a weighted project size score of **12** (Table A-3 of Appendix A).

Water Resource Availability Score

The current agricultural production on-site is irrigated by well water. Of the 389.5-acre site, 209.9 acres (54 percent) is under agricultural production. Using the Water Resource Availability Scoring Table (Table A-4 of Appendix A), it was identified which option is most applicable for the irrigated portion of the Meadowood site, based upon the feasibility of irrigation in drought and non-drought years, and whether physical or economic restrictions are likely to exist. As the site is irrigated by groundwater from wells located on-site, there are no physical or economic restrictions with regard to water availability in non-drought years. However, in dry years, there are both physical and economic restrictions. The physical restriction pertains to the high level of dissolved salts in the well water in combination with the greater amount of water pumped versus falling naturally as precipitation. The economic restriction represents the higher electricity costs of pumping extra water because of the decreased rainfall.

Non-Drought Years:

Irrigated Production Feasible: Yes

Physical Restrictions: No

Economic Restrictions: No

Drought Years:

Irrigated Production Feasible: Yes

Physical Restrictions: Yes

Economic Restrictions: Yes

Using the above-mentioned Water Resource Scoring Table from the California LESA Model Instruction Manual, it appears that option five is the most appropriate. Therefore, the site was given a score of 80. The score of 80 was then multiplied by the portion of the project under irrigated agricultural production, equaling a water availability score of 45.2. The water resource availability score represents 15 percent of the weighted factor rating in the LESA Model, resulting in a weighted water resource availability score of **6.8**.

Surrounding Agricultural Land Use Score

To calculate the Zone of Influence (ZOI), the smallest rectangle was drawn around the project boundary to completely encompass the project area. A second rectangle was drawn around the project boundary, which extends one-quarter mile on all sides beyond the first rectangle. The ZOI includes all parcels that are contained within or are intersected by the second rectangle, less the area of the project itself (Figure 9).

The total ZOI acreage was calculated (using the LESA Instruction Manual, 1997) to be 1,716.3 acres. Land that was in current agricultural production within the ZOI equaled 880.7. This acreage was derived by calculating the total acreage of CDC Important Farmlands including the Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance categories. The total acres in agricultural production were divided by the total ZOI acreage to determine the percent of the ZOI in agricultural use (45.1 percent). Using the Surrounding Agricultural Land Use Score Table, a corresponding score was given to the ZOI. Based on the table, the Surrounding Agricultural Land Use Score for the Meadowood site is **60**.

Protected Resource Lands Score

To calculate the Protected Resource Lands Score, all lands within the ZOI (see Figure 9) that are “protected resource lands” as defined by the Agricultural Land Use Guidelines was totaled. The total acreage equaled approximately 455 acres using conservative criteria based on Williamson Contracts; publicly owned lands maintained as park, forest, 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. That acreage was then divided by the total ZOI acreage equaling 35 percent. Using the Protected Resource Lands Score Table (Table A-7 of Appendix A), a corresponding score was given to the ZOI. Based on the table, the Protected Resource Lands Score for the Meadowood site is **0**.

Figure 9, color

Total LESA Score Results

Table 3 presents the California Agricultural LESA scoring thresholds.

**TABLE 3
LESA SCORING THRESHOLDS**

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

The California LESA Model is weighted so that 50 percent of the total LESA score of a given project is derived from the LE factors (Land Capability and Storie Index), and 50 percent from the SA factors (Project Size, Water Resource Availability, Surrounding AG lands, and Protected Resource Land). A single LESA score is generated for a given project after all of the individual LE and SA factors have been scored and weighted as detailed in the table below. Just as with the scoring of individual factors, the final project scoring is based on a scale of 100 points, with a given project capable of deriving a maximum of 50 points from the LE factors and 50 points from the SA factors.

Scoring thresholds are based upon both the total LESA score as well as the component LE and SA subscores. In this manner the scoring thresholds are dependent upon the attainment of a minimum score for the LE and SA subscores so that a single threshold is not the result of heavily skewed subscores (Table 4).

**TABLE 4
FINAL LESA SCORESHEET**

Factor Name	Factor Rating	Factor Weighting	Weighted Factor Rating
Land Capability Classification	27.75	0.25	6.9
Storie Index Rating	24.34	0.25	6.1
Project Size	80	0.15	12
Water Resource Availability	45.2	0.15	6.8
Surrounding AG Lands	60	0.15	9
Protected Resource Lands	0	0.05	0
TOTAL LESA SCORE			40.8

The Total LESA Score for the proposed Meadowood project is 40.8 for the project site as a whole, with the subscores for Land Evaluation and Site Assessment totaling 13 points and 27.8 points, respectively. The LESA Model requires that the Model score is greater than or equal to 40.0, plus both subscores are greater than 20 points for the site

to be considered a significant agricultural resource. Therefore, the Meadowood site is not considered to be significant.

Conversion of Important Farmland Categories

In addition to consideration of the LESA Model findings for a determination of significance, the conversion of Important Farmland Categories is considered in the determination of significance of direct impacts to agriculture. Table 1 and Figure 6 show the acreages of Important Farmland Categories on-site. Approximately 136.3 acres of the north and northeastern portion of the project site are considered grazing lands according to the FMMP. This area may have supported limited grazing in the past, but is primarily native vegetation. Approximately 147.6 acres of the central portion of the site is considered Unique Farmland, primarily where avocado production has occurred. Approximately 54.2 acres along the central western portion of the site where citrus crops have been grown is considered Farmland of Statewide Importance. The remainder of the site is classified as Farmland of Local Importance (approximately 43.1 acres), Other land (approximately 1.0 acre), and a small portion of the site (approximately 6.3 acres) is categorized as Prime Farmland.

Based on the proposed project design, the project would directly impact 161.1 acres of the project site's agricultural uses, but would permanently preserve/retain 49.3 acres of existing citrus and avocado groves within agricultural easements. Given that 49.3 acres of land currently in agricultural use will be preserved permanently, feature and farmland designations either through direct development impacts or impacts from placing biological restrictions over portions of the property. Many of these lands contain quality agricultural soils as defined by the FMMP. Therefore, the impacts related to the conversion of agricultural land Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance to non-agricultural uses are reduced to a level that would be less than significant. is considered a significant impact to agriculture.

6.1.2 Direct Impacts Related to Off-site Improvements

Development of the Proposed Project would require the removal of approximately 3.8 acres of agriculture to accommodate off-site improvements.

6.1.3 Summary of Direct Impacts

Approximately 209.9 acres of the Meadowood project site are in agricultural uses, primarily citrus and avocado groves. Development of the Meadowood project would convert approximately 161.1 acres to residential uses. The remainder, 49.3 acres, would remain as citrus/avocado groves. Also, as stated in Section 6.1.2 above, approximately 3.8 acres of agricultural land would be impacted by off-site improvements. The remainder, 49.3 acres, would remain be retained as citrus/avocado groves under an

agricultural easement. Although determined to be less than significant under the LESA model, these direct impacts represent a loss of agricultural production on land with quality soils as defined by the FMMP. Therefore, direct impacts to agricultural resources on- and off-site would be considered **significant** due to the conversion of agricultural land to a non-agricultural use. Impacts associated with the conversion of agricultural land to non agricultural use would be less than significant for the following reasons:

1. Based on the LESA analysis the Project site does not contain significant agricultural resources.
2. As stated in the County Department of Agriculture – Weights and Measures Annual Crop Report (2008), “...the way agriculture is conducted on the County’s approximately 5,255 farms differs greatly from agricultural operations in the majority of California. Economically productive agriculture is conducted on small farms with 63 percent of farms ranging from 1 to 9 acres in size, 77 percent of farmers living on their farms and 92 percent of farms being family owned. In contrast, the average size of farms statewide is 346 acres.” This is due to a variety of factors including high land values and high production costs. In San Diego County, land value is typically linked to its residential development potential. There are no exclusive agricultural zones in the County which would limit the land values to agricultural use only. As a result, much of the local agriculture is conducted on subdivided parcels that have a residential component. The high cost of production, particularly high water costs, forces the production of high value crops. The result is that smaller scale, high value agriculture is characteristic in San Diego County. In addition, in San Diego County, farming “is allowed in any zone” and “typically occurs among residential land uses”. Therefore, the 49.3 acre agricultural parcel of farmland would be sufficient acreage to continue viable agriculture.

Another factor affecting viability of the retained agriculture is irrigation water availability. In general, irrigation water in San Diego County is expensive, but the retained groves within the Project Site would have access to inexpensive recycled water from the on-site WWTP.

3. The project design includes retention of 49.3 acres of retained agriculture within a would not only be under a conservation easement. The groves, but would be maintained/operated under common ownership, by the Meadowood HOA. This is an important factor because, as stated in the County Agricultural Guidelines, “preservation of agricultural resources ensures that the land would remain available for agricultural use; however, the choice to use the land for agriculture is the decision of the individual property owner”. This means that a typical conservation easement cannot ensure that a parcel continues to be used for agriculture, and merely preserves the agricultural soils for future use. In contrast, the agricultural open space easement on the Proposed Project would remain in agricultural use because, as a

condition of Proposed Project approval, the HOA would be required to maintain the avocado/citrus groves.

4. In addition to the 49.3 acre agricultural preserve, the Proposed Project would preserve ~~128.5~~122.4 acres of natural open space, thereby preserving native soils (primarily classified as FMMP Grazing Land) and serving as a buffer to prevent indirect “edge” effects both to and from the adjacent agricultural lands. Together, the agricultural and natural open space would total ~~177.8~~171.7 acres along the eastern portion of the Project Site. The remaining development is “clustered” within the western portion of the Project Site.
5. Of the 160.6 acres of farmland to be impacted from development of the Proposed Project, only a small portion (6.4 acres) is designated as “Prime”.

6.2 Indirect and Cumulative Impacts (Guideline 3)

6.2.1 Indirect Impacts

The proposed residential community would be adjacent to farmland. Agricultural practices on adjacent farmland may have to be modified due to the proximity of the proposed project. Examples of such changes might include techniques for applications of pesticides to avoid potential health effects to residents of the proposed project, limitations on grading and harvesting practices to minimize dust generation, and modifying hours of operation to reduce exposure to noisy farm equipment. Each of these changes increases the farming costs at the adjacent farmland properties. Therefore, maintenance of the agriculture adjacent to the project site could be impacted and could result in a significant indirect conversion of farmland.

Other indirect impacts of farmland conversions would result from edge effects. For example, residents from the proposed project may trespass, pilfer crops, or damage farm equipment. The pressure, inconvenience, and increased costs of operating the adjacent farm may render continued farming infeasible, or at least heighten the attractiveness of selling the farm for development. If this were to occur, eventually another indirect conversion could result from leapfrog or non-contiguous development pattern. Development approvals result in the grouping of viable agricultural parcels between urban land uses, the likely continuation of urban expansion often results in the conversion of the farmland area.

Development of the proposed project would result in the construction of residential units in close proximity to the cattle grazing occurring to the west and the field crop operations to the east and south. However, the project mitigation measures including proposed natural open space and agricultural open space easements, would create buffers (see Figure 7 providing separation between the project's development area and offsite agricultural uses to the north and east. The buffer would be a minimum of 1,000 feet and up to approximately 2,500 feet at it's widest. Also, as part of the project design, a landscape is proposed between the agricultural open space and the on-site residential areas providing additional buffering.

Pursuant to the County's Right-to-Farm Ordinance, disclosure statements would be required in sales documentation for all proposed residential units. The statements would notify potential owners that the adjacent property could potentially be used for agricultural operations such as cattle ranching and that there could be associated issues such as odors, noise, and vectors. Pursuant to Guideline 3, indirect impacts would be less than significant as a result of the aforementioned buffer and landscaped areas. In addition, required disclosure statements would also ensure future residents are made aware of the potential for farming activities in the area and the ongoing rights of existing agricultural operations.

6.2.2 Cumulative Impacts

The following analysis includes an assessment of potential cumulative impacts based on the "List of Projects Method" identified in the CEQA Guidelines.

A cumulative impact study area and project list has been developed as part of the CEQA EIR process for this project, and a focused version (specifically tailored for agriculture) was used for the analysis within this report. A list of projects with a summary of project features and agricultural resources is provided in Table 5. The cumulative agricultural effects of the project were evaluated based on Table 5 and Figure 10.

The following projects could potentially have a cumulative impact on agricultural resources within the cumulative impact study area:

- TM 5338 (SP83-01) Campus Park (Passerelle) – This project proposes 1,084 residential units on 417 acres as well as retail space, offices, a sports complex and a neighborhood park. Approximately 85 acres of the Campus Park site are now owned by Palomar College, who plans to construct a new campus to serve 12,000 students. There are no Williamson Act contracts on the site, and the CDC Important Farmland designations on-site are Farmland of Local Importance and Other. The site contains 176 acres that is zoned A-70 and used for cattle grazing.

**TABLE 5
MEADOWOOD - CUMULATIVE PROJECTS LIST**

Project	Project Description	Project Reference Numbers	Location	Agricultural Resources Identified On-Site
1. Campus Park (Passerelle)	The Passerelle project proposes 1,000 residential units on 504.2 acres as well as retail space, offices, and a school.	GPA 03-004 SPA 03-008 Rezone 03-014 TM 5338	5090 Pala Rd 364 Pala Mesa Heights Rd	The site is designated as Farmland of Local Importance and Other. The site also contains 176 acres that are zoned A-70 and used for cattle grazing.
2. Campus Park West (Pappas)	Campus Park West is located adjacent to Campus Park West (Passerelle), approximately 0.5 mile west of the Meadowood project, and is an amendment to the previously approved 442 acre Specific Plan for Campus Park (Passerelle). The 118.5-acre project site proposes 566 residential units, commercial and office uses, a park, and open space.	SPA 05-001 GPA 05-003 Rezone 05-005 TM 5424	5050 Pala Rd 3135 S Old Highway 395	The project site contains Farmland of Local Importance. There are no Williamson Act Contracts within the project area. There are no ongoing agricultural operations on-site.
3. Prominence at Pala	The Prominence at Pala proposes 30 units on 347 acres that are designated Multiple Rural Use (18). There is no agriculture on-site.	TM 5321	36313 Pala Del Norte Rd.	None
4. Pala Mesa Highlands	130 residential units on approximately 86 acres, with 37 acres proposed to be preserved as biological/natural open space.	MUP 04-024 Rezone 99-020 SPA 99-005 TM 5187	4399 Pala Mesa Dr	None
5. Fernandez Minor Subdivision	3 lot parcel split	TPM 20936	3838 Foxglove Ln.	None

**TABLE 5
MEADOWOOD - CUMULATIVE PROJECTS LIST
(continued)**

Project	Project Description	Project Reference Numbers	Location	Agricultural Resources Identified On-Site
6. Crossroads Investors Minor Subdivision	Residential subdivision of 15.5 acres	TPM 20800	1248 Ranger Rd.	None
7. Fallbrook Oaks	The Fallbrook Oaks project site is zoned A70 and C36. The project proposes 19 lots on 27.2 acres.	GPA 05-006 Rezone 05-015 PAA 05-002 PAA 04-008 TM 5449	3918 Reche Rd	None
8. Los Willows Inn and Spa	This Major Use Permit would be used to add additional units to an existing Bed and Breakfast and would allow weddings and receptions to occur. The project site contains citrus trees on-site. However, the trees and groves are used for their scenic value and are not actively farmed. In addition, they would not be impacted by the proposed expansion to the Bed and Breakfast.	MUP 03-127	532 Stewart Canyon Rd.	None

**TABLE 5
MEADOWOOD - CUMULATIVE PROJECTS LIST
(continued)**

Project	Project Description	Project Reference Numbers	Location	Agricultural Resources Identified On-Site
9. Palisade Estates	This project proposes 51 lots on 408 acres. The project site has a Multiple Use (18) designation and RR-.25 zoning. The project site consists of steep slopes and native vegetation. There is no agriculture on-site.	TM 5158	3880 Dos Ninos Rd.	None
10. Rabuchin Minor Subdivisions	Four lot minor Subdivision encompassing a total of 9.9 acres	TPM 20944	4065 Calle Canonero	None
11. Pala Mesa Condos	59 detached single family units on 3 lots within 31 acres	TM 5231	Canonita Drive at Old Highway 395	None
12. Pala Minor Subdivision	5.6 acres to be split into 3 single family lots	TPM 20451	Canonita Drive	None
13. Pala Mesa Resort	Specific Plan Amendment and MUP to expand existing resort by 6 acres and construct new maintenance facilities, hotel units, and timeshare units as well as new wedding and reception area facilities	SPA 03-005 Rezone 04-007 MUP 03-006 MUP 04-005	2001 Old Highway 395 at Tecalote Drive	None
14. Rosemary's Mountain Quarry	Aggregate rock quarry and plants for concrete and asphalt. Originally approved in 1997, changed approved in 2006.	MUP 87-021	SR-76, 1.25 miles east of I-15	None
15. Tedder Subdivision	13 single family units on 29.5 acres	TM 4729	Pala Mesa Drive and Daisy Lane	<u>The site is currently graded, but was previously comprised of groves.</u>

**TABLE 5
MEADOWOOD - CUMULATIVE PROJECTS LIST
(continued)**

Project	Project Description	Project Reference Numbers	Location	Agricultural Resources Identified On-Site
16. San Luis Rey Municipal Water District Master Plan Update	Explores the various options for water storage and delivery.	N/A	Along the San Luis Rey River east of I-15	None
17. Palomar Community College District – North Education Center	Approximately 85 acres of what was previously Campus Park would be developed with administrative facilities, athletic fields, classrooms, parking, and open space.	N/A	East of I-15, between SR-76 and Pala Mesa Heights Drive	None
18. Envirepel Fallbrook Renewable Energy Facility (FREF)	Multi-purpose energy facility that would convert biomass into electricity with very low emissions	Being reviewed for adequacy with the California Energy Commission, no DPLU permits required	South of San Luis Rey River and east of Pankey Road	None
19. Unnamed Gas Station	Major Use Permit to construct a gas station and 4,950-square-foot convenience store on 3.5 acres.	N/A	4397 Pala Mesa Drive	None
20. Pipeline No. 6	Approximately 31 miles of water pipeline from Lake Skinner to Escondido; 6.5 miles of tunnel from County line to SR 76, then 12 miles of pipeline to the south.	Final EIR (1993)	San Diego County Portion from SR-76, across Couser Canyon, Lilac Road, and Gopher Canyon Road	None
21. SR-76 Road Widening / Re-alignment	Caltrans realignment and widening of roadway and improvements to northbound I-15 and ramps	N/A	From I-15 to west of Rice Canyon Road	None

**TABLE 5
MEADOWOOD - CUMULATIVE PROJECTS LIST
(continued)**

Project	Project Description	Project Reference Numbers	Location	Agricultural Resources Identified On-Site
22. Berezousky TPM	Minor Subdivision; 4 lots on approximately 3.1 acres.	TPM 20874	<u>3956 Pala Mesa Drive</u> 311 Pala Mesa Drive	<u>Project Denied. None</u>
23. Bridge Pac West TPM	Minor subdivision; 4 lots plus one remainder lot on 15.9 acres	TPM 20841	3321 Sage Road	<u>Although not actively farmed the site supports Unique Farmland and Farmland of local importance.. Due to the large size of parcels proposed, it is assumed approximately 5 acres of the 15.9 would likely be impacted since agriculture would remain viable on larger lots</u> None
24. Chipman TPM	Minor subdivision; 4 lots plus one remainder lot on 13.5 acres	TPM 20440	East side of Citrus Lane between peony Drive and Dos Ninos	None
25. Bierman TPM	Minor subdivision; 4 lots plus one remainder lot on 9.9 acres	TPM 20484	4065 Calle Canonero	None
<u>26. Fallbrook Ranch,</u>	<u>11 lot major subdivision on 12.8 acres.</u>	<u>TM5532</u>	<u>2365 S. Old Highway 395</u>	<u>Site supports Unique Farmlands and old orange groves.</u>
<u>27. Dimitri, Diffendale, and Kirk</u>	<u>4 lot minor subdivision</u>	<u>TPM 21075,</u>	<u>South of Monserate Hill Road</u>	<u>10 acres of groves.</u>
<u>28. The Monserate Minor Subdivision</u>		<u>TPM 21156</u>	<u>3624 Monserate Hill Road</u>	<u>19 acres of groves</u>

**TABLE 5
MEADOWOOD - CUMULATIVE PROJECTS LIST
(continued)**

Project	Project Description	Project Reference Numbers	Location	Agricultural Resources Identified On-Site
<u>29. Sumac Minor Subdivision</u>		<u>TPM 21076</u>	<u>Sumac Road</u>	<u>8 acres of agricultural land</u>
<u>30. Fernandez Minor Subdivision</u>				<u>4 acres of agricultural land (groves).</u>

*Project numbers listed in this table correspond to the project's geographic location depicted in Figure 10 of this document.

SFR = Single-family residential.

N/A = Environmental Document not yet available.

Figure 10, color/oversize

- TM 5424 (PAA 04-003) - Campus Park West (Pappas) – The Campus Park West project is located adjacent to Campus Park West (Passerelle), approximately 0.5 mile west of the Meadowood project, and is an amendment to the previously approved 442-acre Specific Plan for Campus Park (Passerelle). The 118.5-acre project site proposes 369 residential units, commercial and office uses, a park, and open space. The project site contains Farmland of Local Importance. There are no Williamson Act Contracts within the project area. There is a small (approximately 10 acres) area of the site that was previously farmed, but which is reverting back to native vegetation. Based on field reconnaissance and a review of aerial photos, it was determined that there is no active agriculture on-site.
- Fallbrook Ranch, TM 5532 is an 11 lot subdivision at 2365 S. Old Highway 395 that contains Unique Farmlands and old orange groves. The project may impact approximately 12.8 acres of agricultural land.
- Dimitri, Diffendale, and Kirk, is a four lot minor subdivision, TPM 21075, located south of Monserate Hill Road. The property supports 10 acres of groves.
- The Monserate minor subdivision, TPM 21156 located at 3624 Monserate Hill Road has approximately 19 acres of groves.
- Sumac minor subdivision, at Sumac Road, TPM 21076 has approximately eight acres of agricultural land.
- Fernandez minor subdivision has approximately four acres of agricultural land (groves).
- Tedder Subdivision impacted approximately 13 acres of agricultural land. The site is now graded, but previously supported groves.
- Bridge Pac West contains Unique Farmland and Farmland of Local Importance. Although not actively farmed, it is considered farmland. Due to the large size of parcels proposed, it is assumed approximately five acres of the 15.9 would likely be impacted since agriculture would remain viable on larger lots.

The climate and topography on the Meadowood project site make it very well suited to support agricultural production, specifically orchard crops. In particular, San Diego County's climate enables avocados and citrus crops to grow well on the hillsides that make up a large portion of the project site's landscape. For this reason, a cumulative analysis was performed in order to compare the agricultural potential of the site against total agricultural production of the county and within a two-mile radius.

Fruit and nut crops, of which avocados and citrus comprise 75 percent, are 17 percent of the total value produced by agriculture in the county and 16 percent (43,127 acres) of the total acreage. Approximately 40,305 acres of citrus and avocado crops were grown

in San Diego County in 2005; representing a slight increase (65 acres) in acreage grown in 2003 (County of San Diego 2005c). Cumulative impacts to agricultural lands within the cumulative impact study area results in the loss of approximately 485 acres. However, the project's contribution toward this cumulative impact would be avoided through the preservation of the 49.3 acre agricultural open space area. No significant cumulative impacts would result.

~~This represents a cumulatively significant impact. The Proposed Project would account for the loss of 164.4 acres (160.6 on-site and 3.8 acres off-site). This contribution to the cumulative loss of agricultural resources would be considered significant. However, the Proposed Project's preservation of 49.3 acres of agricultural open space would mitigate this cumulative impact to below a level of significant.~~

Cumulative impacts related to farmland conversion could also result from edge effects, including trespassing, pilfering of crops, and damaged farm equipment. The pressure, inconvenience, and increased costs of operating remaining farms in areas converting to other uses may render continued farming infeasible or, at least, heighten the attractiveness of selling other farms for development. However, the edge (indirect) effects and cumulative impacts associated with this project will be reduced to a level that is less than significant with the implementation of the environmental design considerations ~~and mitigation measure~~ proposed for this project.

6.3 Local Plans and Policies (Guidelines 2 and 4)

6.3.1 Existing Land Use Designations and Zoning

As part of this project, the Regional Land Use Map is proposed to be amended to change the designation for Meadowood from SSA and RDA to CUDA. The CUDA category is intended for near-term urban development. In addition, the Fallbrook Community Plan is proposed to be amended to change the site from (21) Specific Plan and (18) Multiple Rural Use to (21) Specific Plan for the entire project site. This would allow for the preparation of a Specific Plan Amendment with a density of 2.5 units per acre resulting in a maximum of 900 dwelling units.

Current zoning in the Multiple Rural Use is Limited Agriculture, A70.. The proposed project would rezone the entire site to the S-88 Specific Planning Area Use Regulation. The proposed rezoning would not represent a significant impact to agriculture because it would not result in any conflicts with zoning for agricultural use. In San Diego County, agriculture is allowed in any zone and there are no exclusive agricultural zones. The project's proposed specific plan amendment and rezone would make the site's zoning consistent with proposed use, while continuing to allow agriculture in the agricultural

open space areas and within residential lots where parcel sizes can accommodate agriculture. As a result, the proposed changes in land use designations and zoning would result in less than significant impacts to agricultural resources.

6.3.2 Local Agricultural Ordinances and Policies

California Land Conservation (Williamson) Act - Section 3.2 discusses the fact that there are no Williamson Act contract lands within the proposed project. As discussed, there is a Williamson Act contract located approximately one mile to the southeast of the project site. Although there are active agricultural uses occurring on the Williamson Act Contract land, potential indirect and cumulative impacts to agriculture (including the Williamson Act parcel) associated with the implementation of the proposed project were found to be less than significant pursuant to Guideline 3 analyzed in Section 6.2 above. As a result, pursuant to Guideline 2, there would be no significant direct, indirect, or cumulative impacts to Williamson Act contract lands.

San Diego County General Plan Policies - As discussed in Section 2.0, the San Diego County General Plan (1996) contains several policies that relate to agriculture in some way, such as land use, open space, and conservation as discussed below:

- **San Diego County General Plan, Regional Land Use Element** – As noted in Section 2.0, the land use designations for the entire site are proposed to be changed to (21) Specific Plan. A portion of the site that is currently designated (18) Multiple Rural Use would change to (21) Specific Plan. Neither the existing nor proposed land use designations include policies for the protection of agriculture, the (18) Multiple Rural Use category also indicates that the designation is applied in areas “not highly suited for intensive agriculture”. As no land use designations preclude avocational agriculture on individual residential lots (i.e., small orchards on individual lots), the proposed change in land use designation would not present a conflict with agricultural policies and would not present any significant impacts related to agricultural resources pursuant to Guideline 4.
- **San Diego County General Plan, Conservation Element** – The Conservation Element promotes agriculture through such goals as conducting annual inventories of areas with high agricultural potential, encouraging new Williamson Act Contracts, identifying and implementing efforts to preserve agriculture, and incorporating the most detailed soil data available in environmental analyses. These goals and policies are primarily related to encouraging new agricultural uses or managing existing uses. As there are no Williamson Act Contracts on-site and the project has evaluated the potential agricultural impacts including an assessment of soil resources, therefore project is not in conflict with the goals and policies of the Conservation Element. Furthermore, the project’s inclusion of 49.3 acres of agricultural open space would ensure onsite agriculture is retained and therefore, the

project would not create significant impacts associated with the implementation of policies related to the Conservation Element.

- **San Diego County General Plan, Open Space Element** – The Open Space Element policies in relation to agriculture are those that encourage directing development away from the most productive agricultural areas; minimizing conflicts between agricultural and non-agricultural areas due to developing residential uses within agricultural areas; and minimizing conflicts between agricultural and residential uses due to agricultural-related nuisances and hazards such as chemical applications, and the generation of noise, dust, odors, and pests. Potential impacts associated with the proposed project in all of these areas have been discussed throughout this report and were found to be less than significant or reduced to below a level of significance through project design measures and/or mitigation measures. Therefore, the project does not conflict with agricultural goals and policies of the open space element.

County Board of Supervisors Policy I-38 – This policy (described in Section 2.0) establishes criteria for implementing the Williamson Act. However, there are no Williamson Act Contract lands within the project site; thus, no impacts would occur resulting from the implementation of the proposed project.

San Diego County Agricultural Enterprises and Consumer Information Ordinance - This ordinance recognizes that the commercial agricultural industry in the county of San Diego is a significant element of the county's economy and limits the circumstances under which agricultural activities may constitute a nuisance. The Ordinance includes requirements such as providing noticing to prospective buyers in rural areas that agricultural activities may take place within the vicinity and that there are associated inconveniences, irritations, and discomforts that may occur as a result. As discussed in Section 3.8, there are agricultural operations occurring within the vicinity of the proposed project, such as the cattle grazing to the west and the field crop operations occurring to the east and south. As required by the ordinance, notice to prospective homebuyers will be provided to notify future residents that agricultural uses exist in the vicinity of the project and that these uses maintain certain rights to practice agriculture in accordance with normal and accepted practices.

In summary, no conflicts with local plans and policies related to agriculture have been identified that could result in significant impacts to agricultural use. Therefore, less than significant impacts would occur with respect to Guidelines 2 and 4.

7.0 ~~Mitigation Measures and Environmental Design Considerations~~

As discussed in this report, agricultural impacts are considered less than significant with the exception of the potential for significant direct impacts to on-site agricultural resources. ~~incorporation of project design measures that include agricultural easements and such as landscape buffers and open space and buffers agricultural easements.~~ Mitigation measures and Project design elements are proposed consistent with this finding and are discussed below.

Project Design Measures:

~~Mitigation:~~ The project will retain 49.3 acres of agriculture in an agricultural open space easement that will provide for on-site retention of agricultural resources. This agricultural open space easement ~~will provide adequate mitigation~~ would preclude significant impacts relative to for the loss of on-site agriculture based on the quality of agricultural land ~~on-site~~. The 49.3 acres of avocado and citrus groves would be maintained by the Meadowood Homeowners' Association and would be dedicated as a preserve in perpetuity.

~~Project Design Measures:~~ Agricultural production often includes various practices and operations that are not compatible with urban uses on adjacent parcels. Therefore, close proximity of urban uses to agricultural land may inhibit agricultural production. The project has been designed such that agricultural and natural open space easements create adequate buffers separating on-site non-agricultural uses from adjacent agricultural uses. Specifically, the combination of open space areas, including the agricultural open space ~~proposed as mitigation for~~ for a design feature to preclude direct agricultural impacts, would, provide a large buffer of undeveloped land to separate the proposed residential uses from other more rural land to the north and east.

In addition, as part of the project design, a landscaped area between the agricultural open space and the on-site residential areas would be implemented to provide additional buffering to encourage the ongoing viability of the preserved agricultural areas.

Finally, as required by the Agricultural Enterprises and Consumer Information Ordinance, notice to prospective homebuyers will be provided to notify future residents that agricultural uses exist in the vicinity of the project and that these uses maintain certain rights to practice agriculture in accordance with normal and accepted practices.

8.0 Conclusions and Recommendations

The project proposes development of up to 886 residential units in the Fallbrook Community Plan area, which has agricultural and rural characteristics. Implementation of the proposed project would result in the direct conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance into non-agricultural uses. The LESA analysis prepared for this project resulted in a score indicating that the agricultural resources within the project site are not a significant resource. Further, the analysis of found that project design measures precluded significant impacts due to the ~~Despite this finding, the report concludes that The direct conversion of this designated farmland is considered significant a significant direct impact to agriculture. Mitigation~~ The design feature, in the form of a 49.3 acre agricultural open space easement, ~~is determined to be adequate to mitigate for the project's~~ preclude ensures that impacts would be less than ~~is significant. direct impacts based on the value of the resource onsite as determined by the LESA model. The project would retain approximately 49.3 acres of active agricultural land as agricultural open space.~~

Additionally, the project proposes to implement other design features including a notice to prospective homebuyers, inclusion of a 122.4 acre natural open space easement as a ~~adequate~~ buffers separating proposed on-site non-agricultural land uses from ~~with~~ existing adjacent farming operations, and landscaped areas adjacent to the onsite agricultural open space. These design measures ~~would ensure that indirect impacts associated with edge effects would be less than significant. Further, the project would not result in conflicts with the Fallbrook Community Plan, the California Land Conservation Act, or existing and planned land uses.~~

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10.0 Certification

Lance Unverzagt

- County Agricultural Certification.
- Environmental Analyst, RECON Environmental, Inc.
- Master's degree in Community and Regional Planning.
- Bachelor of Science degree in Business Administration, Major in Agribusiness.