

2.2 Agricultural Resources

This section describes existing agricultural resources and conditions, analyzes potential significant impacts to agricultural resources resulting from implementation of the proposed project and applicable cumulative projects, and identifies potential, feasible mitigation measures to offset project impacts. The agricultural resources analysis characterizes the existing project setting, including any historical farming practices on the property, and the project's farmland suitability based on the categories established by the California Department of Conservation. The analysis is based on the Agricultural Resources Technical Report prepared for the proposed project (Appendix F). In addition, the analysis is focused on consistency with the goals established in the County of San Diego's (County) General Plan and applicable community plans.

Comments received in response to the Notice of Preparation (NOP) included concerns regarding surrounding agricultural operations and the conversion of agricultural land to non-agricultural use. These concerns are addressed and summarized in this section. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this EIR.

2.2.1 Existing Conditions

The proposed project lies within the Bonsall and Twin Oaks communities, which historically have represented a rural development character that include agricultural uses. Off-site agricultural uses in the immediate area consist mainly of small-scale rural residential uses such as avocado groves, fruit trees, or horse breeding. The Bonsall and Twin Oaks communities are designated with regional categories that provide a framework for the regional distribution of land uses (County of San Diego 2011a). The regional category for the portion of the project Site within the Bonsall community (97 acres) is designated as Rural.

The regional categories shown on the Twin Oaks Community Planning Area Land Use Map are primarily designated as Semi-Rural and Rural, with the exception of Village land uses located east and west of the Deer Springs Road/Interstate (I) 15 Interchange. These areas do not contain agricultural uses. The Semi-Rural category identifies areas that are appropriate for lower-density residential neighborhoods, recreation areas, agricultural operations, and related commercial uses that support rural communities, and the Rural category is applied to large open space and very-low-density private and publicly owned lands that provide for agriculture, managed resource production, conservation, and recreation. The Village category identifies areas of higher intensity development.

On-Site Agricultural Uses

The project Site does not contain any existing active agricultural areas, approximately 31.7 acres on-site consist of designated Farmland of Local Importance, and 3.4 acres on Site consist of designated Unique Farmland, as identified by the California Department of Conservation (see Figure 2.2-1, On

Site Important Farmland Categories). The project Site does not currently contain any Williamson Act contract lands, County agricultural preserves, lands designated Prime Farmland or Farmland of Statewide Importance, nor any active irrigated croplands or other crop production.

2.2.2 Regulatory Setting

There are laws, regulations, policies and programs that aim to protect, preserve, and promote agriculture. The following discussion details the most relevant regulations, policies, and programs that could be relevant to the project.

State

Department of Conservation Farmland Mapping and Monitoring Program

In response to the need to assess the location, quality, and quantity of agricultural lands and conversion of such lands over time, in 1982, the California Department of Conservation established the Farmland Mapping and Monitoring Program (FMMP). The goal of the FMMP is to provide consistent and impartial data to decision makers for use to assess the suitability of agricultural lands in California. The FMMP classifies land into five mapping categories based on soil and climatic conditions: (1) Prime Farmland, (2) Farmland of Statewide Importance, (3) Unique Farmland, (4) Farmland of Local Importance, and (5) Grazing Land. In addition, the FMMP identifies nonagricultural lands as either Urban and Built-Up Land or Other Land. Important Farmland Maps are updated every 2 years.

The FMMP identifies farmlands as follows (California Department of Conservation 2010):

- **Prime Farmland.** Prime Farmland has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agriculture production at some time during the 4 years prior to the mapping date.
- **Farmland of Statewide Importance.** Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Unique Farmland.** Unique Farmland consists of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated, but it may include nonirrigated orchards or vineyards, as found in some climatic zones in California. Land must have been cropped at some time during the 4 years prior to the mapping date.

- **Farmland of Local Importance.** Land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee. Based on the County's guidance (County of San Diego 2007), the following lands are to be included in the "Farmland of Local Importance" category:
 - All farmable lands within San Diego County that do not meet the definitions of Prime, Statewide, or Unique but are currently irrigated pasture or nonirrigated crops
 - Nonirrigated land with the soils qualifying for Prime Farmland or Farmland of Statewide Importance
 - Lands that would have Prime or Statewide designation and have been improved for irrigation but are now idle
 - Lands with a General Plan Land Use designation for agricultural purposes
 - Lands that are legislated to be used only for agricultural (farmland) purposes.
- **Grazing Land.** Land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for Grazing Land is 40 acres.

Williamson Act

The California Land Conservation Act of 1965, commonly known as the Williamson Act (Government Code Section 51200 et seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to the full potential market value of the land. The goal of the Williamson Act program is to encourage preservation of agricultural land and prevent its premature conversion to urban uses.

California Public Resources Code

The California Public Resources Code (PRC) defines "forest land" and "timberland" as follows:

'Forest land' is land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (California Public Resources Code Section 12200 (g)).

'Timberland' means land, other than land owned by the federal government and land designated by the board [State Board of Forestry and Fire Protection] as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products,

including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others (California Public Resources Code Section 4526).

California Government Code

The California Government Code defines “timberland” zoned “timberland production” as follows (California Government Code Section 51100 et seq.):

‘Timberland production zone’ or ‘TPZ’ means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, ‘timberland preserve zone’ means ‘timberland production zone.’

Local

County of San Diego Board of Supervisors Policy I-38—Agricultural Preserves

This policy establishes procedures for implementing Williamson Act contracts in the County and for establishing agricultural preserves. This County Board of Supervisors policy also outlines criteria for the establishment, modification, and de-establishment of an agricultural preserve. This legislation and these policies include Williamson Act contracts.

County of San Diego General Plan

Agricultural resources are covered in both the Land Use Element and the Conservation and Open Space Element of the County’s General Plan. Each element is discussed below.

Land Use Element

Despite numerous constraints to agriculture in San Diego County, such as high water and land costs, the County has a robust agricultural economy. Agriculture contributes to the character of the County, and particularly Semi-Rural and Rural Lands, regional categories, supplying County residents with local agricultural products, and contributing significantly to the local economy. A goal of these regional land use categories is the preservation of local agriculture, which includes a diverse mix of high value commodities and takes advantage of a long—in some cases year-round—growing season. Incompatibility of adjacent land uses can present yet another constraint to the viability of local agriculture. As residential and other potentially incompatible development occurs in traditionally agricultural areas, careful attention should be given to the compatibility of these nonagricultural uses and to Site design techniques that would reduce or

avoid potential conflicts. Applicable General Plan goal and policies are as follows (County of San Diego 2011a):

- **Policy LU-5.3, Rural Land Preservation.** Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations. (Open space and rural lands are primary areas that provide carbon sequestration benefits for the Region.)
- **Policy LU-6.4, Sustainable Subdivision Design.** Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities.

Goal LU-7, Agricultural Conservation. A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.

- **Policy LU-7.1, Agricultural Land Development.** Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

Conservation and Open Space Element

The County of San Diego is the only major urban county with a farm gate value¹ ranked among the top 10 agricultural counties in California (generally ranked ninth or tenth from 2005–2013).² The County has the third highest number of farms of any county in California.³ Agriculture is the fifth largest component of the County's economy.⁴ Agriculture in the County provides an array of economic, environmental, and social benefits that contribute to the quality of life in the region. Agriculture also provides a valuable open space resource and plays a critical role in regional wildlife conservation by providing usable open space corridors and habitat for some species (County of San Diego 2011b). Applicable General Plan goal and policies are as follows:

Goal COS-6, Sustainable Agricultural Industry. A viable and long-term agricultural industry and sustainable agricultural land uses in the County of San Diego that serve as a beneficial resource and contributor to the County's rural character and open space network.

¹ The farm gate value of a cultivated product in agriculture or aquaculture is the net value of the product when it leaves the farm, after marketing costs have been subtracted. Since many farms do not have significant marketing costs, it is often understood as the price of the product at which it is sold by the farm (i.e., the farm gate price). The farm gate value is typically lower than the retail price consumers pay because it does not include costs for shipping, handling, storage, marketing, and profit margins of the involved companies (County of San Diego 2011b).

² USDA National Agricultural Statistics Service, Summary of California County Agricultural Commissioners' Reports, 2005–2013. The County of San Diego was not ranked in the top 10 in 2008 and 2011 through 2013 (County of San Diego 2011b).

³ USDA National Agricultural Statistics Service, Census of Agriculture, County Summary Highlights, Table 1, 2012.

⁴ San Diego Regional Chamber of Commerce, 2006.

- **Policy COS-6.2, Protection of Agricultural Operations.** Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:
 - Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations
 - Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses
 - Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development.
 - Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture
 - Supporting local and state right-to-farm regulations
 - Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process.
 - Discourage development that is potentially incompatible with intensive agricultural uses, including schools and civic buildings where the public gather, daycare facilities under private institutional use, private institutional uses (e.g., private hospitals or rest homes), residential densities higher than two dwelling units per acre, and offices and retail commercial.
- **Policy COS-6.3, Compatibility with Recreation and Open Space.** Encourage siting recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.

Recreational and open space uses can serve as an effective buffer between agriculture and development that is potentially incompatible with agriculture uses.

Twin Oaks Valley Community Plan

- **Goal: 3. Promote Agriculture in Non-Urban Areas.** Because:
 - A. a large portion of the unincorporated territory of the Subregion is in some form of valuable agricultural production; and
 - B. agriculture provides economic benefits to County residents.

Promote agriculture by protecting semi-rural and rural areas from urbanization and incompatible development.

- **Policy 8: Promote Agriculture – Outside City Spheres.** Because:
 - A. agriculture is an important commercial activity in the North County Metropolitan Subregion and valuable commercial crops are being raised;
 - B. row crops and nursery production are common to the maritime area climate, while orchards are scattered throughout the eastern portion of the Subregion;
 - C. certain areas have viable commercial agriculture and soil; climate and other conditions are favorable for continuing success; and
 - D. low density Land Use General Plan Designations can be applied to protect agriculture in these outlying and undeveloped locations.

Designate the Twin Oaks Valley (portion outside San Marcos sphere) as Semi-Rural and Rural Lands categories. These designations will limit the intrusion of incompatible land uses from existing agricultural lands.

- **Policy 9: Recognize Avocational Agriculture.** Because:
 - A. avocational agriculture, primarily orchard crops on small parcels, is found throughout the Subregion and is especially common at the urban fringe around the cities of Escondido, San Marcos, and Vista; and
 - B. while the use of such land is primarily residential, avocational agriculture is recognized to be of benefit to both the economy and the environment.

Recognize that avocational agriculture is a compatible secondary use of land throughout the Subregion.

- **Policy 10: Assist Cities in Preparing Agricultural Plans.** Because:
 - A. the Knox-Nisbet Act (Government Code Sections 54774 and 54796) requires Local Agency Formation Commissions (LAFCO) to determine whether agricultural preserves or prime agricultural land would be adversely affected if a proposed annexation were approved; and
 - B. the County has completed extensive work to inventory and analyze agricultural resources in the Subregion and this information can be made available to cities of the Subregion.

Assist cities of the Subregion in preparing Agricultural Plans for the unincorporated areas within their sphere of influence.

Bonsall Community Plan

Agriculture is a key factor in Bonsall's rural community character, as are the scenic, sometimes narrow and winding, rural roads and rolling hill and valley topography. Due to the relatively small area needed for certain crops, such as avocado, citrus, meyer lemons, and grapes, agriculture may effectively coexist with residential uses. This mix of land uses serves to preserve and enhance the rural character of the area by providing a vegetation buffer between houses. Bonsall's most important commercial agricultural and equestrian activity, in terms of gross income, is avocado farming. Smaller, but commercially significant investments include horse ranching, subtropical fruit, nursery and plants.

The following goal and policies related to agriculture are included in the Bonsall Community Plan (County of San Diego 2011a):

- **Goal COS-1.2** The continuation of agriculture as a prominent use throughout the Bonsall community.
 - **Policy COS-1.2.1** Encourage the protection of areas designated for agricultural activities from scattered and incompatible urban intrusions, along with the provision of greenbelt/buffers between agricultural zoning and urban zoning.
 - **Policy COS-1.2.2** Encourage the use of agriculture easements in the CPA, especially as part of the Conservation Subdivision Program, while maintaining community character with rural and semi-rural homes.
 - **Policy COS-1.2.3** Require development to minimize potential conflicts with adjacent agricultural operations, through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture and support local and state right-to-farm regulations.

County of San Diego PACE Program

The County has initiated an agricultural conservation program known as the Purchase of Agricultural Conservation Easement (PACE) Program. The "Mitigation Bank and Credits" are an expanded component of the PACE Program, approved by the Board of Supervisors in September 2014. With this expanded component, easement lands acquired by the County under the PACE Program can be used as off-site mitigation for agricultural impacts resulting from private development projects. Applicants may purchase PACE credits to mitigate for agricultural impacts at a 1:1 ratio. One credit is equal to 1 acre of agricultural land.

To purchase PACE mitigation credits, the project applicant must have an approved discretionary project, with a condition of approval requiring agricultural mitigation. The current PACE mitigation credit fee is \$3,827 per credit. The cost of credits is determined by the fee in effect on

the date of purchase. Credits, which are non-refundable and non-transferrable, can only be purchased after the project has been approved.

2.2.3 Analysis of Project Effects and Determination as to Significance

The County of San Diego has developed *Guidelines for Determining Significance and Report Format and Content Guidelines: Agricultural Resources* (County of San Diego 2007). An affirmative response to, or confirmation of, any one of the following guidelines will generally be considered a significant impact to agricultural resources with project implementation, in the absence of scientific evidence to the contrary. Four categories of potential significant impacts could pertain to this project: (1) direct impacts to on-site agricultural resources, (2) indirect impacts to agricultural resources, and (3) conflicts with agricultural zoning and Williamson Act contracts, and cumulative impacts to surrounding agricultural resources with project implementation. Each of these potential impact categories is assessed in the following subsections, with the significance guidelines included in each subsection.

2.2.3.1 Impacts to Important Agricultural Resources

Guidelines for the Determination of Significance

For purposes of this EIR, the County's *Guidelines for Determining Significance and Report Format and Content Guidelines: Agricultural Resources* (2007) applies to the direct and indirect impact analyses and the cumulative impact analysis.

A significant impact to important on-site agricultural resources would result if:

The project Site has important agricultural resources as defined by the LARA Model; and the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of the Site for agricultural use.

Analysis

On-Site Direct Impacts

Based on a review of the County's available GIS aerial mapping, the project Site does not contain a history of agricultural production. As such, there is no evidence of historic agricultural production per the County's Guidelines for Determining Significance, and the project would not be designated as an agricultural resource. The project contains 31.7 acres of Farmland of Local Importance and the County's Guidelines only consider lands mapped as "Farmland of Local Importance" to be a protected resource if the land was historically used for agricultural production. Therefore, due to the lack of historical evidence of agricultural production, the 31.7 acres is not considered to be a protected agricultural resource. The project Site also contains

approximately 3.4 acres of Unique Farmland that would not be directly impacted by the project. Therefore, the project is not required to be evaluated using the LARA Model analysis. Impacts would be **less than significant**.

The project does not contain any Williamson Act contract lands, County agricultural preserves, lands designated Prime Farmland, or Farmland of Statewide Importance, nor any active irrigated croplands or other crop production. As such, none of these agricultural resources would be directly impacted by the project. The project also contains approximately 3.4 acres of Unique Farmland that would not be directly impacted by the project. However, as stated, there is approximately 31.7 acres of Farmland of Local Importance, most of which occurs on the southern portion of the project Site. Of the 31.7 acres in the southern area of the project Site, approximately 21.6 acres is within the project development footprint and would be directly impacted by implementation of the project. The remaining 10.1 acres would not be directly impacted by the project. However, based on Section 4.2.1 of the County's Guidelines for Determining Significance (County of San Diego 2007), the project would not result in direct impacts because the project would not be composed of important agricultural resources (criteria for Prime Farmland or Farmland of Statewide Importance). Therefore, the proposed project would have **less-than-significant impacts** to agricultural resources.

Off-Site Direct Impacts

Off-site improvements associated with the proposed project are outlined in Chapter 1 of this EIR. They include improvement of Sarver Lane, Deer Springs Road, and Twin Oaks Valley Road to meet current County of SD (and City of San Marcos) standards, intersection improvements, drainage improvements, and improvements to the I-15/Deer Springs Road interchange.

For the widening of Deer Springs Road, this analysis evaluates the impacts from Option B (construct the segment of Deer Springs Road from I-15 to 1,500 feet west of Mesa Rock Road as a four-lane 4.1A Major Road) because it represents the largest area of potential off-site impacts. Although the project Site was determined to not be an important agricultural resource, any impacted off-site agricultural operations were conservatively assumed to be important agricultural resources in this analysis and would require full mitigation for any impacts.

The off-site improvements associated with the project would result in impacts to the following FMMP designations: approximately 5.68 acres of Prime Farmland, and 0.14 acre of Farmland of Statewide Importance (see Figures 2.2-2a through 2.2-2c). These direct off-site impacts to Prime Farmland and Farmland of Statewide Importance would account for a total of 5.82 acres, and most of these impacts would occur within existing roadway rights-of-way, making these areas potentially unavailable for agricultural use in the future. Based on this, the project would result in significant impacts to approximately 35.82 acres of important agricultural resources and require mitigation. See Table 2.2-1, Off-Site Impact Summary.

Pursuant to the County's Guideline for Determining Significance, for direct impacts, a 1:1 mitigation ratio would be required for 5.82 acres of impacts to agricultural resources that meet the soil quality criteria for Prime Farmland and Farmlands of Statewide Importance and that are available for agriculture (County of San Diego 2007). Therefore, the project must mitigate for 5.82 acres of off-site project impacts, which is the total acreage of the parcels that is impacted and that contain Prime Farmland or Farmland of Statewide Importance. Prior to mitigation, impacts would be **potentially significant (Impact AGR-1)**.

While the final configuration and design of the Caltrans interchange improvements at I-15/Deer Springs Road are not known at this time, and while alternative interchange improvements are still under consideration, such improvements are not expected to affect significant agricultural resources as defined by CEQA, because such improvements would be implemented within the disturbed I-15 corridor, and not within or adjacent to any existing, significant agricultural, farmland, timberland, or forest resources. Once Caltrans selects the proposed interchange improvement among the alternatives to be considered, Caltrans can and should assess, or cause to be assessed, whether the proposed interchange project and its alternatives will have a potentially significant impact on any significant agricultural, farmland, timberland, or forest resources.

2.2.3.2 Indirect Impacts to Agricultural Resources

Guidelines for the Determination of Significance

For purposes of this EIR, the County's Guidelines for Determining Significance (2007) applies to the direct, indirect, and cumulative impact analyses.

A significant indirect impact to agricultural resources would result if:

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

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

Analysis

Williamson Act Lands

No Contract lands or County Agricultural Preserves exist within 0.25 mile of the project Site. Therefore, the project does not propose a non-agricultural land use within a 0.25 mile radius of land under contract.

Land Use Conflicts

Adverse impacts caused by incompatible development near existing agricultural uses include farm practice complaints, pesticide use limitations, liability concerns, and economic instability caused by urbanization and changing land values; trespassing, theft, and vandalism; damage to equipment, crops, and livestock; crop and irrigation spraying limitations due to urban use encroachment; introduction of urban use pollutants entering farm water sources; competition for water supplies; development affecting groundwater recharge; soil erosion and stormwater runoff from urban use; shading of crops from inappropriate buffering; importation of pests and weeds from urban areas or introduced pest populations from unmaintained landscaping; increased traffic; effects of nighttime lighting on growth patterns of greenhouse crops; interruption of cold air drainage; and construction-related fugitive dust and other particulate emissions.

The project includes the proposed construction of a school in the southeastern portion of the Site near Deer Springs Road in the proposed Sierra Town Center planning area. The proposed project would be a use that involves a concentration of people at certain times within 1 mile of existing agricultural land uses and Contract lands. The proposed school would be developed approximately 1.1 miles northeast of the land under Contract. As a result of the proposed project, land use conflicts between the Contract land and existing agricultural land and the proposed project could occur.

Of the current land uses within the 1 mile of the project Site, approximately 16 acres are used for row crops that include tomatoes, beans, strawberries, cucumbers, potatoes, squash, cauliflower, and peppers. Within 1 mile of the project Site approximately 243 acres support nursery and greenhouse agriculture that typically contain structures used to cultivate high-value products, such as flowering/foliage plants and gourmet food products such as mushrooms. Nursery and greenhouse operations may also be used to grow commodities, such as landscaping, decorative plants, fruit trees, herbs, and flowers. Additionally, approximately 1,041 acres within the 1 mile of the project Site is currently used for orchard (e.g., citrus and avocado orchard) or vineyard purposes. The location of these existing agricultural operations are shown in Figure 2.2-3, Important Farmland Categories within 1 Mile of Project Site.

The largest piece of active agricultural land located within 1 mile of the southern boundary of the project Site, is made up of seven parcels totaling 120 acres. The land is owned and operated by Golden Door Properties LLC. The 120 acres is primarily made up of orchards (e.g., citrus and avocado orchard). Based on historic aerials this land appears to have been actively farmed continuously throughout the years (1994 to 2016). This area of the County has experienced an increasing amount of surrounding development throughout the last few decades. Surrounding development has increased the amount of traffic in the area and has contributed to negative effects on air quality. When agricultural crops are exposed to high concentrations of various air pollutants, crops become susceptible to injury. Particulate matter such as cement dust, magnesium-lime dust and carbon soot deposited on vegetation can inhibit the normal respiration and photosynthesis mechanisms within the leaves (Ontario Ministry of Agriculture, Food and Rural Affairs 2003).

Although these active agricultural lands are within 0.25–1.0 mile of the project boundary, the development footprint of the proposed project does not abut any of these existing active agricultural lands due to proposed open space, fire safety fuel modification zones, and existing road improvements. The closest proposed project land use to an active agricultural operation would be the residential lots in the Sierra Knoll planning area located approximately 150 feet from the nearest active agricultural use, which are the orchards to the southwest of the project along Lynn Lane. The County's Guidelines for Determining Significance states, "[t]he type of agricultural uses surrounding the project Site will affect the degree of agriculture interface conflicts that would be expected to occur. For example, orchard crops such as avocados and citrus are often compatible with residential uses" (County of San Diego 2007). As such, the less intensive interface conflicts or orchard operations and the 150-foot buffer between these orchards and the nearest residential lot on the project Site would reduce potential indirect land use conflicts. Additionally, the higher-density homes, along with the proposed school, would be located in the Sierra Town Center planning area near Deer Springs Road and I-15 in the southeast portion of the project Site, which is located away from existing agricultural operations. The approximate distance from the nearest existing agricultural operation is 0.8 mile. As detailed in Section 1.2, Project Location and Description, the project includes 1,209 acres of open space that would be permanently preserved in three major blocks along the northern, eastern, and central portions of the project. This open space area, Block 3 in particular, would buffer development on the project from surrounding agricultural areas, such as operations on the Golden Door Properties LLC property, and reduce potential land use conflicts with the existing agricultural operations surrounding the project Site. The open space area associated with the Special Fuel Mod Zone would help buffer development from the agricultural operations along Lynn Road. The project would also include professionally managed vineyards and Community gardens in park areas that promote an agriculture character, provide a productive agricultural use on the project Site, and further separate active agricultural uses from incompatible land

uses. Potential pollutants from urban runoff would be collected and treated on Site and would not enter water sources for surrounding agricultural operations. The proposed project would not substantially affect groundwater recharge or impact growth patterns of greenhouse crops due to nighttime lighting. Furthermore, due to the distances from existing operations, intervening hills and topography, and the existing semi-rural environment of the surrounding community, indirect impacts to nearby agricultural operations are not expected to occur. The project's proposed development would be buffered from the existing off-site active agricultural land uses within the 0.25-mile radius and indirect impacts from the conversion of agricultural land would be **less than significant**.

Changes to Existing Environment

The proposed project would include development of residences, commercial uses, a school, and various off-site roadway improvements. The potential direct impacts of the proposed project on off-site agricultural soils would be fully mitigated through payments into the County's PACE program. Additionally, the closest proposed non-agricultural land use lots would be located approximately 150 feet from the nearest active agricultural use. This and many of the other existing agricultural operations in proximity to the project are orchards, which have a lower degree of potential land use conflicts with residential uses (County of San Diego 2007). Further, the proposed project would include 1,209 acres of open space, professionally managed vineyards, and Community gardens that would blend in with the surrounding agricultural areas and reduce potential land use conflicts with the existing agricultural operations surrounding the project.

Considering these land uses and the distance of the proposed project's development to existing agricultural uses, the proposed project is not anticipated to change the existing environment, which due to its location or nature, could result in the conversion of off-site agricultural resources, including Williamson Act contract land, to non-agricultural use or could adversely impact the viability of agriculture on land under a contract. The proposed project would not preclude agricultural operations on these lands and is not anticipated to result in the conversion of these off-site agricultural resources to a non-agricultural use. For the reasons described above, indirect impacts from the proposed project to agricultural resources would be **less than significant**.

2.3.3.3 Conflicts with Agricultural Zoning and Williamson Act Contracts

Guidelines for the Determination of Significance

For purposes of this EIR, the County's Guidelines for Determining Significance (2007) applies to both the direct impact analysis and the cumulative impact analysis.

A significant impact would result if:

- The project conflicts with a Williamson Act contract (contract) or the provisions of the California Land Conservation Act of 1965 (Williamson Act).

Analysis

The proposed project would not conflict with land under a Williamson Act contract or the provisions of the California Land Conservation act of 1965. Impacts would be **less than significant**.

2.2.3.4 Consistency with Applicable Plans, Policies, and Ordinances

The proposed project would be consistent with General Plan Land Use Policies LU-5.3, LU-6.4, LU-7.0, and LU-7.1. The proposed project is consistent with Policy LU-5.3, Rural Land Preservation, because perimeter neighborhoods would be surrounded by the Rural Lands characterized by open space, habitat conservation, recreation, and other uses associated with rural areas. The proposed project would be consistent with Policy LU-6.4, Sustainable Subdivision Design, because development of the Community would be focused into seven compact neighborhoods designed to promote land stewardship and avoid the most sensitive biological, cultural, and topographic resources. The proposed project also is consistent with Policy LU-7.0, Agricultural Conservation, because the Specific Plan introduces agricultural uses as a benefit to the planned Community. Vineyard plantings strategically located on slopes along the loop road create a unique visual identity, establish a connection to the region's agrarian history, and provide a productive landscape. Vineyards are very low-water use crops that provide a productive agricultural use of the irrigated open space. They have a low fuel volume and provide excellent fire resistance. In addition, the proposed project would be consistent with Policy LU-7.1, Agricultural Land Development, because the densest proposed land uses would be in the southeast corner of the project Site near Deer Springs Road and I-15, with land use density decreasing to the north and west, nearest the proposed open space and existing adjacent agricultural land uses.

There are several General Plan Conservation Policies that apply to the proposed project: Policies COS-6.0, COS-6.2, and COS-6.3. The proposed project is consistent with Policy COS-6.0 because the proposed project would not reduce the viability, long-term agricultural industry, or sustainable agricultural land uses in the County of San Diego that serve as a beneficial contributor to the County's rural character and open space network. Although the proposed project would change the zoning for a portion of the Site from A70 to Residential, this land has never been in active agricultural production, nor is it designated by the FMMP as Prime Farmland or Farmland of Statewide or Local Importance. The project also would include professionally managed vineyards and Community gardens in park areas that promote an

agriculture character, provide a productive agricultural use on the project Site, and further separate active agricultural uses from incompatible land uses. Overall, the long-term viability of the agricultural industry in the County would not be affected by this zone change. In addition, the proposed project would preserve approximately 1,209 acres of land as open space.

The proposed project would be consistent with Policy COS-6.2, Protection of Agricultural Operations, because development of the proposed project would not result in the fragmentation or substantial interruption of the surrounding agricultural land uses. Proposed development, including the proposed school, would be densest in the southeast corner of the project Site, away from the majority of the existing nearby agricultural land uses and would not propose incompatible uses immediately adjacent to existing nearby agriculture. Adequate open space buffers are proposed around new development. The proposed project would retain approximately 6 acres of land currently zoned as agricultural land but does not propose the expansion of such land uses. The proposed project also would be consistent with Policy COS-6.3, Compatibility with Recreation and Open Space, because the proposed project provides a buffer of open space (portions of which also act as fire safety fuel modification zones) between proposed development and existing adjacent agricultural land uses (Figure 2.2-4, Active Agriculture).

The project Site lies within the Bonsall and Twin Oaks Valley communities, which have historically represented a rural development character that can include agricultural uses. Both community plans include goals and policies related to agricultural resources. The portion of the project Site that lies within the Bonsall community is currently open space and would remain in open space after implementation of the proposed project. The proposed project would not impact any agricultural lands within the Bonsall community. A majority of the Site, however, lies within the Twin Oaks Valley community. The proposed project would be consistent with the goals and policies in the Twin Oaks Valley Community Plan because the project includes 1,209 acres of open space that would be preserved in three major blocks along the northern, eastern, and central portions of the project Site. This open space area would buffer development on the project Site from surrounding agricultural areas and would reduce potential land use conflicts with the existing agricultural operations surrounding the project Site. The project also would include professionally managed vineyards throughout the Community that promote an agricultural character, provide a productive agricultural use on the project Site, and further separate active agricultural uses from incompatible land uses.

For additional discussion on the proposed project's consistency with applicable land use plans and policies see Section 3.3, Land Use and Planning.

2.2.4 Cumulative Impact Analysis

Per CEQA Guidelines Section 15130(b)(1), a list of projects has been compiled, which is based on past, present, and probable future projects, that could cumulatively contribute to the project's impacts. Cumulative projects include agricultural resources on Site, ongoing agricultural operations (including fallow land), and properties with a history of agricultural uses. Projects that meet any of these criteria have been included in the cumulative analysis.

The cumulative projects study area generally includes the North County Metropolitan Subregion. This area was chosen due to similar climate, topography, and the overall rural characteristics in the vicinity. The North County Metropolitan Subregion has approximately 8,460 acres of grazing land and approximately 11,230 acres of cropland (County of San Diego 2011a). However, more densely urbanized areas exist within and surrounding this Subregion including the cities of Vista, San Marcos, and Escondido. Table 2.2-2, Cumulative Projects, lists the cumulative projects nearby the project.

Cumulative projects surrounding the project, such as the Golf Green Estates project, would increase development that could preclude agricultural operations or reduce the compatibility of the surrounding area with agriculture. These projects could result in potential cumulative impacts from the conversion of agricultural land and of compatibility with agricultural uses. However, some of the cumulative projects would retain the rural character of the area and even enhance agricultural operations, including Moody Creek Farms.

As discussed above, the project Site is not considered to be comprised of important agricultural resources and would mitigate for any potential direct off-site impacts to agricultural resources. According to the County's Guidelines for Determining Significance, "[a] project that is determined not to be an important agricultural resource, that would not have significant indirect impacts to agricultural resources, and that would not conflict with agricultural zoning or a Williamson Act contract would not have the potential to contribute to a cumulative impact" (County of San Diego 2007). Further, the higher-density homes in the proposed project would be located near I-15 in the southeast portion of the project Site. The proposed project is not anticipated to change the existing environment, and would not result in the indirect conversion of off-site agricultural resources to a non-agricultural use or adversely impact the viability of agriculture on land under any Williamson Act contract.

Therefore, the project would **not result in a cumulatively considerable impact** on agricultural resources.

2.2.5 Significance of Impacts Prior to Mitigation

Impact AGR-1 The proposed project's off-site improvements along Deer Springs Road have the potential to directly impact approximately 5.82 acres (total parcel size of parcels with Prime Farmland or Farmland of Statewide Importance) of off-site important agricultural resources.

2.2.6 Mitigation Measure

M-AGR-1 The applicant shall purchase mitigation credits through the County of San Diego's (County) Purchase of Agricultural Easements (PACE) program. The County's PACE program is an approved mitigation banking method, which uses in-lieu fees to purchase PACE credits to offset agricultural impacts. Each acre of land permanently protected with an agricultural conservation easement under the PACE program would equate to one mitigation credit. Therefore, prior to issuance of a grading permit, the applicant shall mitigate for the 5.82 acres of assumed impacts at a 1:1 ratio by the purchase of 5.82 mitigation credits through the County's PACE program.

While the final configuration and design of the Caltrans interchange improvements are not known at this time, such improvements are not expected to affect significant agricultural because these improvements would be implemented within the disturbed I-15 corridor, and not within or adjacent to any existing, significant agricultural, farmland, timberland, or forest resources. However, to ensure potential impacts to agricultural resources remain less than significant, this EIR recommends the following measure:

M-AGR-2 Pursuant to California Public Resources Code Section 21081(a)(2), in coordination with the I-15 interchange improvement project, which is to be fully funded and constructed by the project applicant, though is within the responsibility and jurisdiction of Caltrans to approve, Caltrans can and should assess, or cause to be assessed, whether the improvements would have a potentially significant impact on any agricultural, farmland, timberland, or forest resources as part of the NEPA/CEQA process. Where such impacts are unavoidable, Caltrans can and should require such impacts are mitigated in the manner prescribed by the environmental review document.

2.2.7 Conclusion

Mitigation measure **M-AGR-1** would fully mitigate potential direct off-site impacts (**Impact AGR-1**) through payments into the County's PACE program.

**Table 2.2-1
Off-Site Impact Summary**

Parcel being Impacted	Prime Farmland Impacted	Farmland of Statewide Importance Impacted	Farmland of Local Importance being Impacted	Other Land being Impacted	Urban and Built-up Land being Impacted	TOTAL Impact
1822701900	0.022			0.037		0.06
1822701400	0.336					0.34
1822701200	0.864		0.682			1.55
1822601000	0.139		0.151	0.050		0.34
1822600800	3.407		0.002			3.41
1820810800		0.114		0.003		0.12
1820810700		0.024			0.109	0.13
1820740700	0.908			1.110		2.02
TOTAL	5.68	0.14	0.84	1.20	0.11	7.96

**Table 2.2-2
Cumulative Projects**

Project Name	Project Number	Agricultural Resources On Site	Important Agricultural Resource?	Direct Impact Estimate	Potential Indirect Impact Estimate	Brief Project Description
North County Metro – NC22	103 PDS2012-3800-12-005	None	-Sunset Climate Zone 21 is rated “high” -Not classified as prime farmland soil -Not located on Williamson Act Lands	No direct impacts	Located in an area of steep terrain and built-out land. Low potential to impact surrounding agricultural areas	44 Single-family rural residential – SR1 class
North County Metro – NC3A	105 PDS2012-3800-12-005	Some orchards	-Climate Zone 21 is rated “high” -Site terrain slope grade is predominantly over 25% -Contains Farmland of Statewide Importance and Prime Farmland soils if	Estimated impact of approximately 2 acres of Important Farmland	Potential to effect surrounding North County Metro agricultural areas	10 Single-family residential – SR10

**Table 2.2-2
Cumulative Projects**

Project Name	Project Number	Agricultural Resources On Site	Important Agricultural Resource?	Direct Impact Estimate	Potential Indirect Impact Estimate	Brief Project Description
			irrigated -Not located on Williamson Act lands			
Champagne lakes, MUP MOD	118 PDS2006-3301-70-212-02	None	-Located on soils rated prime farmland, if irrigated. -Climate Zone 21 is rated "high" -Not located on Williamson Act lands	No direct impacts	<u>None</u>	Modification for the relocation of 51 RV spaces and one mobile home space to include full hookups to 20 RV spaces, a new restroom, and an area screened by landscaping for vehicle storage
Moody creek farms llc, MUP MOD; p79-134w	120 PDS2009-3301-79-134-07	Orchards on site	-Potential Prime Farmland soil rating if irrigated and drained	Approximately 23% of land on site is considered Prime Farmland if irrigated and drained	Active farmland is located north and northeast of the project. Potential for indirect impacts to surrounding agricultural resources	Expansion of the footprint of the previously approved Major Use Permit to include all of the stables; barns; riding rings and arenas; ¾ mile horse training track; ranch manager's residence; farm employee housing; and accessory structures associated with the Equestrian Facility.
Hidden Meadows – Oak Woodlands Rezone	122	Yes	Contains Farmland of Statewide Importance soils	<u>Yes</u>	<u>Potentially</u>	17.3 acres of General Commercial, 5.6 acres of Office/Professional, 7.7 acres of 10.9 DU/AC Multi-family Residential and 5.2 acres of 15.0 DU/AC Multi-family Residential
Brisa del Mar	128 PDS2012-3800-12-002, PDS2012-3600-12-004, PDS2006-3100-5492	Yes	Contains Farmland of Local Importance soils	<u>Yes</u>	<u>Potentially</u>	Tentative Map for a residential subdivision of 206 acres into 27 x 2-acre minimum lots

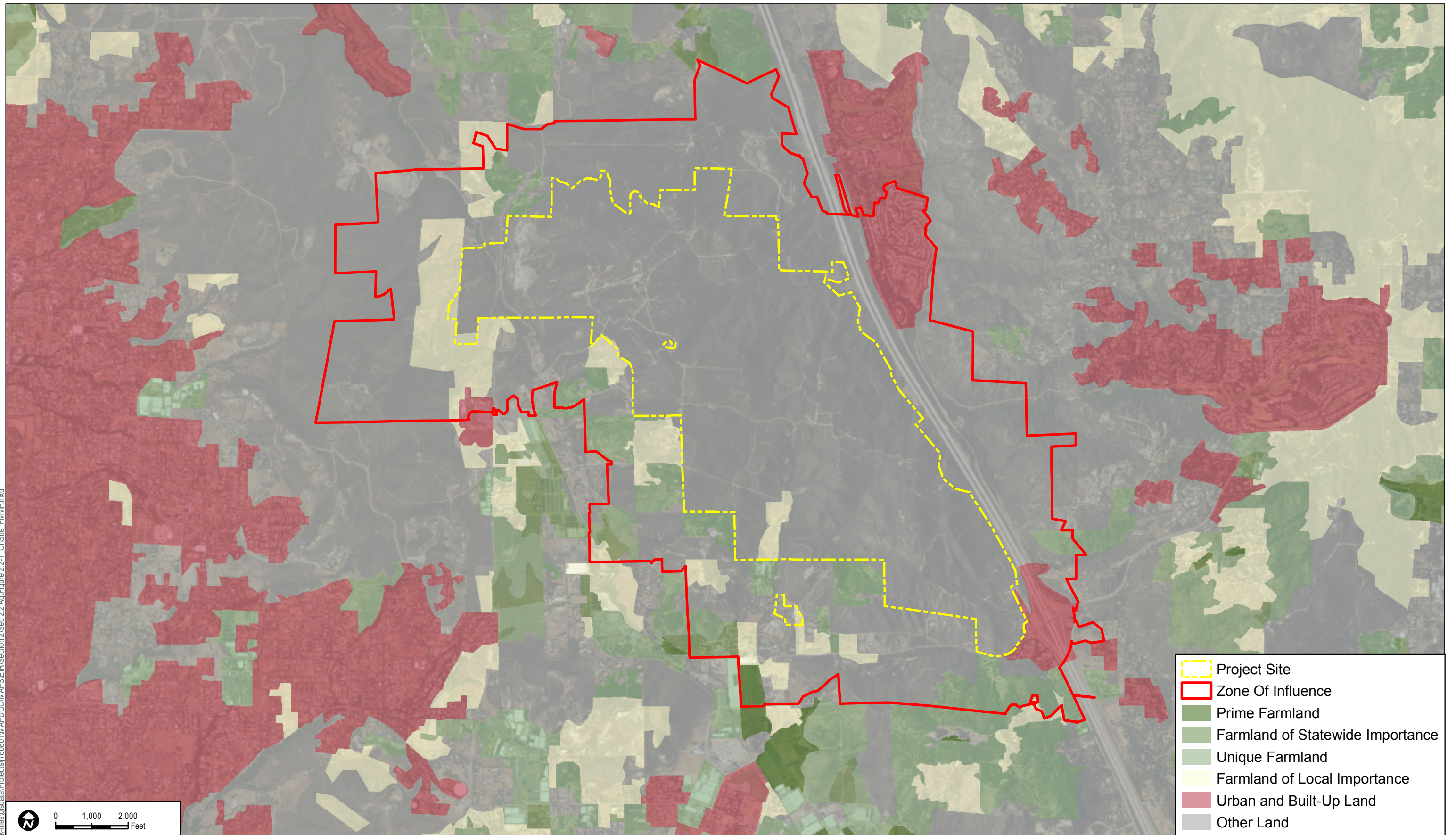
**Table 2.2-2
Cumulative Projects**

Project Name	Project Number	Agricultural Resources On Site	Important Agricultural Resource?	Direct Impact Estimate	Potential Indirect Impact Estimate	Brief Project Description
Charles Froehlich Tentative Map (TM)	130 PDS2006-3100-5494	None	–	None		Residential subdivision of two parent parcels, resulting in a total of six lots; site is located on Double K Road within the Valley Center Community Planning Group in unincorporated San Diego County
Golf Green Estates Site Plan	134 PDS2006-3100-5498, PDS2007-3500-07-011	No	–			116 lot subdivisions of 6,000-square foot parcels
West Lilac Farms I & II	141 PDS2002-3100-5276	Yes	Unique Farmland	<u>Yes</u>	<u>Potentially</u>	Approved Tentative Map for 28 single-family lots on 92.8 acres
Boyer	142 PDS2003-3200-20794	Yes	Unique Farmland	<u>Yes</u>	<u>Potentially</u>	Approved Tentative Parcel Map for 3 lots on 3 acres
Hefner/brown 4 lot and remainder Tentative Parcel Map (TPM): TP	148 PDS2009-3200-21159	No	–			Subdivide a +/- 57.9 acre parcel into four lots plus a remainder (lots range from 7.4 to 13.1 net acres)
Kirkorowicz, TPM	150 PDS2005-3200-20986	Yes	Unique Farmland	<u>Yes</u>	<u>Potentially</u>	Two-lot subdivision for the creation of two single-family residences and associated driveways and septic
Nichols Whitman, TPM	156 PDS2005-3200-20950	Yes	Contains soils designated for Farmland of Local Importance and Prime Farmland	<u>Yes</u>	<u>Potentially</u>	TPM four lots
Souris, TPM, 4 lots	162 PDS2004-3200-20820	Yes	Contains Farmland of Local Importance Soils	<u>Yes</u>	<u>Potentially</u>	Divide 38.8 net acres into 4 parcels ranging from 4.01 to 21.47 net acres; one existing single-family residence and guesthouse resides on Parcel 3 and will remain

**Table 2.2-2
Cumulative Projects**

Project Name	Project Number	Agricultural Resources On Site	Important Agricultural Resource?	Direct Impact Estimate	Potential Indirect Impact Estimate	Brief Project Description
Tran TPM	163 PDS2004-3200-20835	Yes	Contains Farmland of Local Importance soils	<u>Yes</u>	<u>Potentially</u>	4 single-family residential lots
Turner, TPM	164 PDS2008-3200-21113	Yes	Contains Farmland of Local Importance soils	<u>Yes</u>	<u>Potentially</u>	4 single-family residential lots

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FIGURE 2.2-2a
Option B Off-Site Important Farmland Categories

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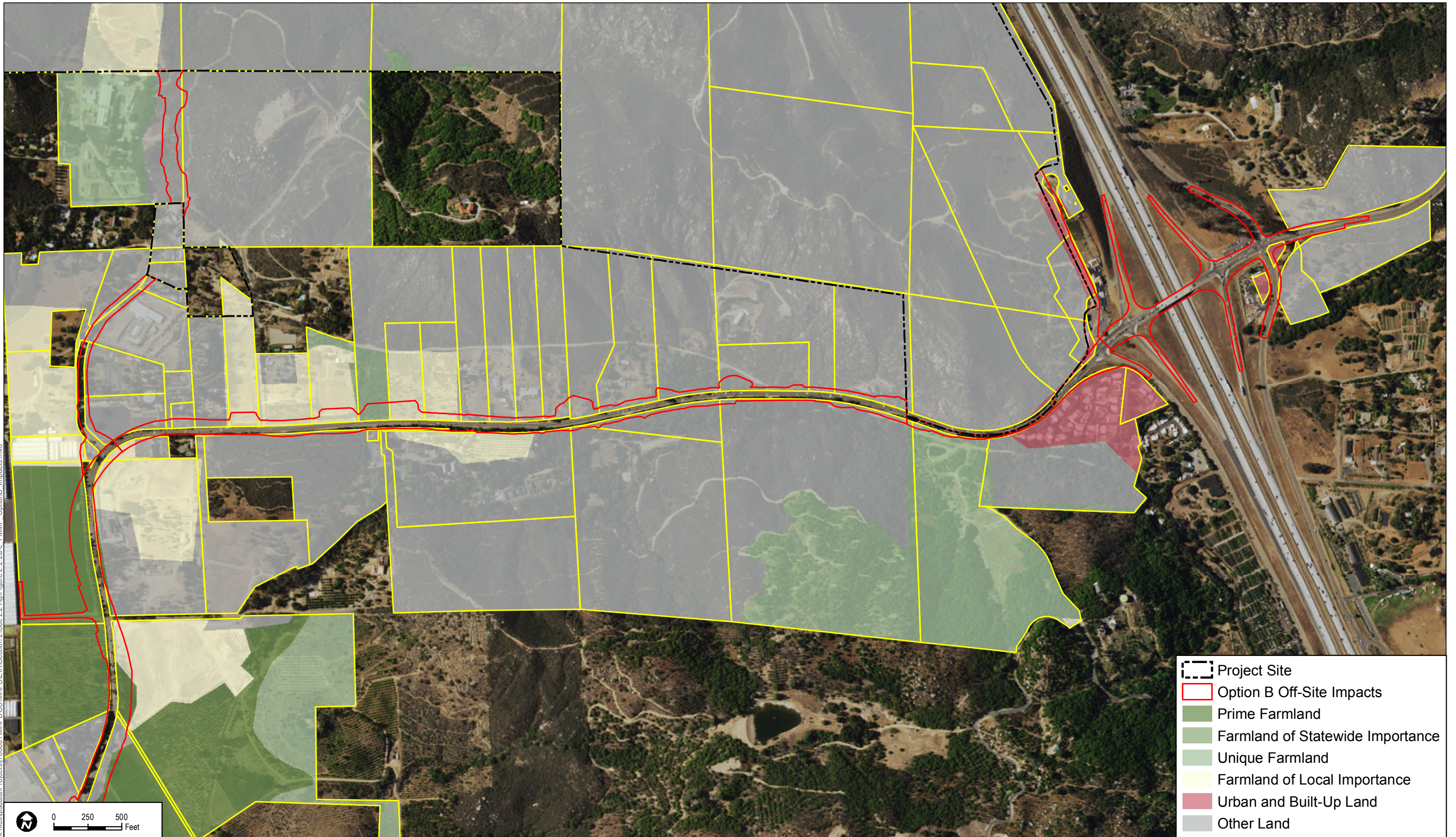
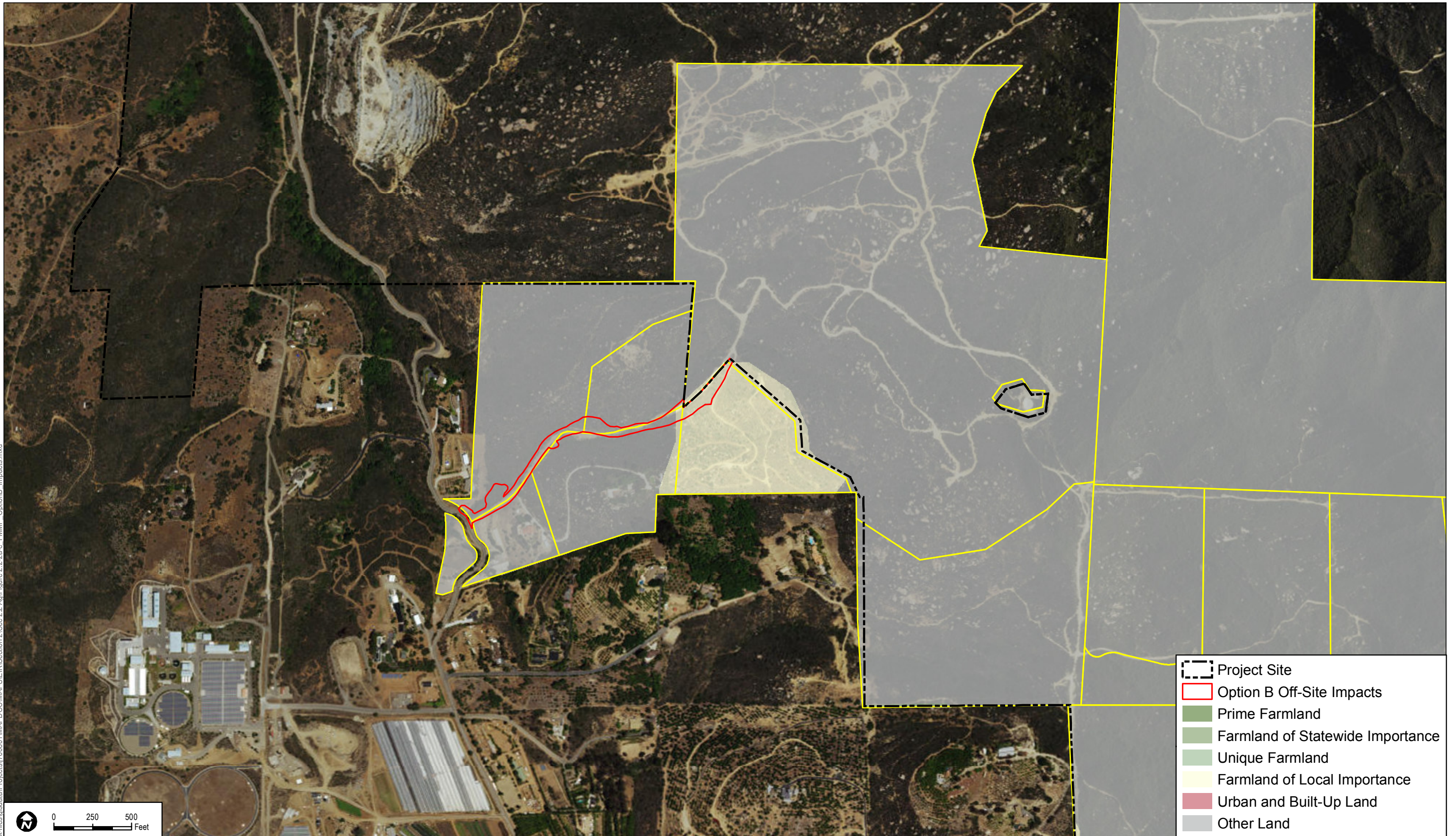


FIGURE 2.2-2b
Option B Off-Site Important Farmland Categories

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- Project Site
- Option B Off-Site Impacts
- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Farmland of Local Importance
- Urban and Built-Up Land
- Other Land

FIGURE 2.2-2c
Option B Off-Site Important Farmland Categories

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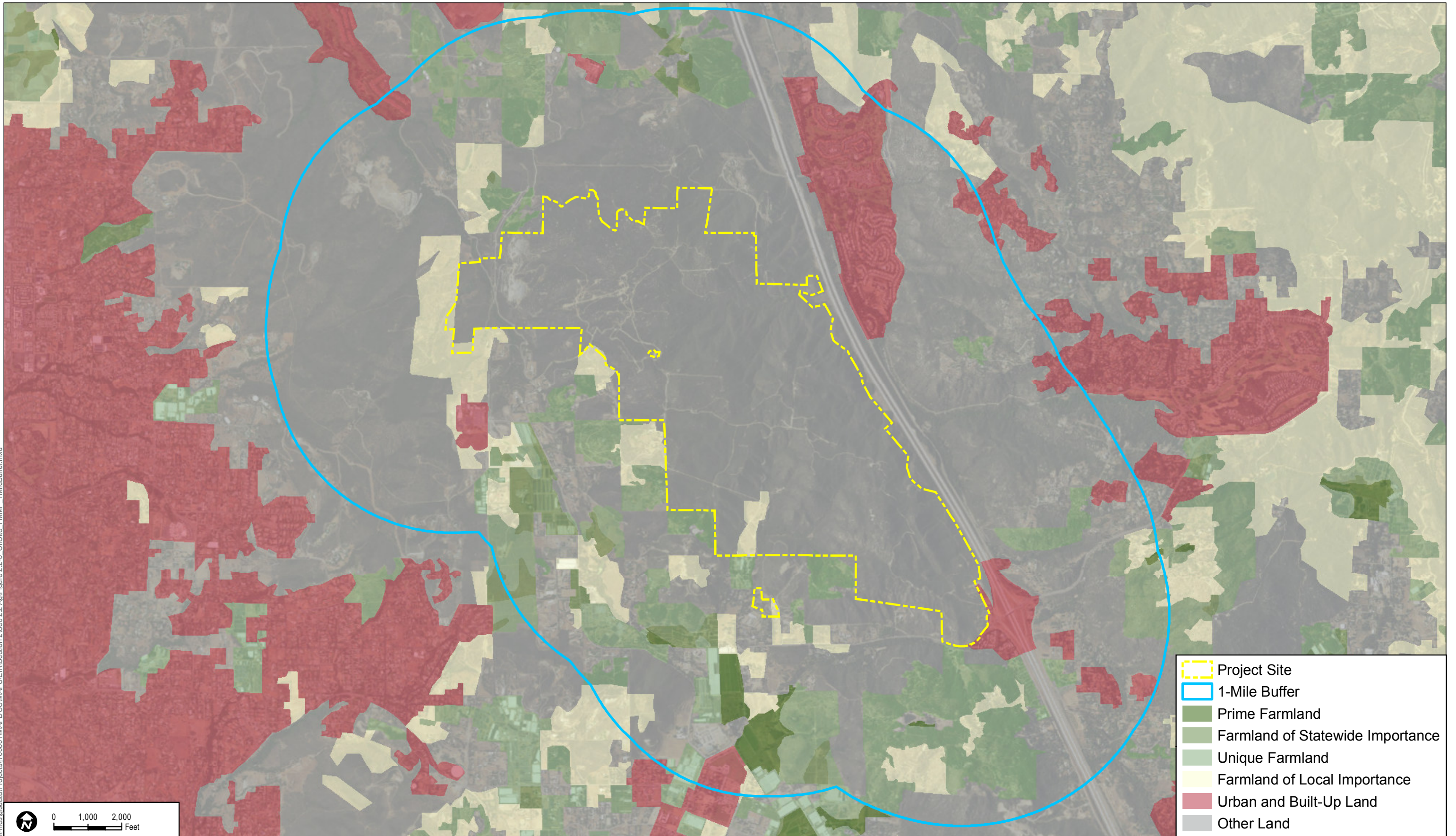
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FIGURE 2.2-2d
Option B Off-Site Important Farmland Categories

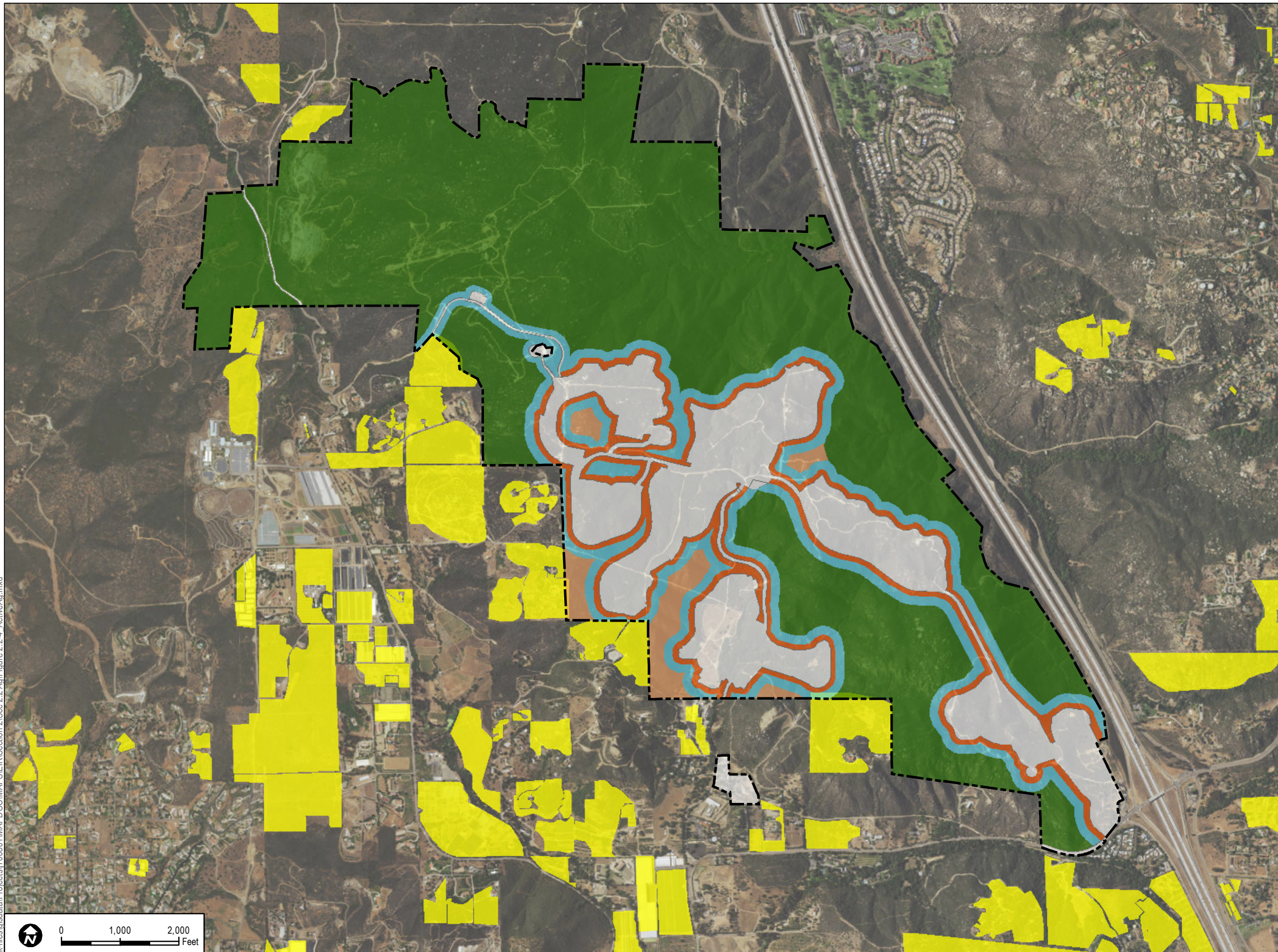
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- Project Site
- Existing Agricultural Areas
- DEVELOPMENT PLAN**
- Preserve
- Special Fuel Management Areas
- Fuel Mod Zone 1
- Fuel Mod Zone 2
- Development

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