AGRICULTURAL RESOURCES REPORT
LILAC HILLS RANCH
SAN DIEGO COUNTY, CALIFORNIA

SPECIFIC PLAN
GENERAL PLAN AMENDMENT
REZONE
EIR
TENTATIVE MAP (MASTER)
TENTATIVE MAP (PHASE 1 IMPLEMENTING TM)
MAJOR USE PERMIT

PROJECT APPLICANT:
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PREPARED FOR:
COUNTY OF SAN DIEGO
5510 OVERLAND AVENUE, THIRD FLOOR
SAN DIEGO, CA 92123
KIVA PROJECT: 09-0112513
SP 3810-12-001
GPA 3800-12-001
REZ 3600-12-003
TM 5571 RPL43 and 5572 RPL43
MUP 3300-12-005

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June 5, 2014

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ATTACHMENT

Glossary of Terms and Acronyms

AA	Agricultural Adjacency
AWM	San Diego County Department of Agriculture, Weights and Measures
BMP	Best Management Practice
CAC	County Agricultural Commissioner
CC&R	Conditions, Covenants, and Restrictions
CDC	California Department of Conservation
CEC	California Education Code
CEQA	California Environmental Quality Act
County	County of San Diego
CWA	County Water Authority
DTSC	Department of Toxic Substances Control
ESA	Phase I Environmental Site Assessment
FMMP	Farmland Mapping and Monitoring Program
FMZ	Fuel Modification Zone
GIS	Geographic Information System
GPS	Global Positioning System
GPU	General Plan Update
HOA	Homeowners Association
I-15	Interstate 15
LARA	Local Area Resources Assessment
LBZ	Limited Building Zone
LCC	Land Compatibility Classification
LESA	Land Evaluation and Site Assessment
LID	Low Impact Development
MUP	Major Use Permit
NRCS	Natural Resources Conservation Service
PACE	Purchase of Agricultural Conservation Easements
PDC	Project Design Consideration
PSR	Property Specific Request
REC	Recognized Environmental Condition
RF	Recycling Facility
ROW	right-of-way
SI	Storie Index
SFS	Single-family Senior
TDS	total dissolved solids
USDA	United States Department of Agriculture
USGS	U.S. Geological Survey
VCMWD	Valley Center Municipal Water District
WRF	Water Reclamation Facility
ZOI	Zone of Influence

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Summary

As part of this technical report, an Agricultural Resources Local Area Resources Assessment (LARA) Model was prepared for the project. The results of the LARA analysis are discussed in subchapter 2.1 of this document.

Based on the results of the LARA Model, the site is ~~not~~ considered an important agricultural resource. The site received a ~~low~~ moderate rating for soil quality and a high rating for climate and water resources. These three criteria are Required Factors, pursuant to the LARA Model~~, and a rating of low for any one Required Factor automatically identifies the project site as not an important agricultural resource~~. Since ~~one~~ two of the three Required Factors ~~is~~ were rated ~~low~~high and one was rated moderate, ~~there is no need to analyze~~ the Complementary Factors were also analyzed pursuant to~~found in~~ the LARA Model requirements. The site received a high rating for the Surrounding Land Uses factor and a moderate rating for both Land Use Consistency and Slope factors. This result would place the project within Scenario 2, which means that the site is an **important agricultural resource**. Mitigation would be accomplished through the purchase of 43.8 acres of agricultural in-lieu credits through the County's Purchase of Agricultural Conservation Easements (PACE) program (or equivalent). The LARA model analysis is attached as Attachment A~~1~~ to this report. ~~Similarly,~~ The project was found to have a less than significant impact in association with agricultural zoning and Williamson Act conflicts.

With respect to Urban/Agricultural Interface Compatibility conflicts, the project was found to have significant indirect impacts. This conclusion was reached by identifying 13 areas, referred to as "agricultural adjacency" areas or (AAs), around the project perimeter where there are existing off-site agricultural operations. As discussed in Chapter 3.0, several locations around the perimeter of the project would subject the adjacent off-site agricultural operations to indirect (compatibility) impacts. These indirect impacts would be significant for AA areas 3, 4, 5, 6, 7, 8, 9, 10, and 13 and would require the implementation of mitigation in the form of agricultural buffers, fencing, and usage restrictions.

Cumulative impacts are discussed in Chapter 5.0 below, and analyzed based on the same guidelines discussed for direct/indirect impacts. ~~Pursuant to the County's Guidelines, a project that is determined not to be an important agricultural resource under the LARA model, that would not have significant indirect impacts to agricultural resources, and that would not conflict with agricultural zoning or a Williamson Act Contract would not have the potential to contribute to a cumulative impact.~~ The conclusion reached with respect to the loss of Important Farmland within the defined cumulative project area is that it would be cumulatively considerable; however, the project's incremental contribution to this impact would be reduced to less than significant through the mitigation measure implemented for direct impacts. That mitigation requires the purchase of agricultural in-lieu credits through the County's PACE program (or equivalent). The analysis ~~also~~ reaches a conclusion that

cumulative impacts to Williamson Act Contract lands and agricultural preserves would be less than significant. Lastly, cumulative edge (indirect) impacts were discussed and the analysis reached the conclusion that other cumulative projects would be required to implement similar design considerations and mitigation measures as the project. Thus, the project's contribution would be less than cumulatively considerable with respect to indirect impacts.

1.0 Introduction

1.1 Purpose of the Report

This technical report serves to evaluate potentially adverse impacts that the Lilac Hills Ranch project may have on agricultural resources. This document utilizes the County of San Diego Guidelines for Determining Significance – Agricultural Resources to evaluate these potential impacts on agriculture. Specifically, the primary purpose of this analysis is the following:

- To determine the importance of on-site agricultural resources and assess the potential impacts to those resources
- To determine potential impacts to surrounding active off-site agricultural operations and/or lands under a Williamson Act Contract.
- To address potential land use conflicts between the proposed non-agricultural uses and the approximately 23.8~~20.3~~ acres of agriculture which would remain a permanent part of the project.
- To address potential indirect effects on surrounding active off-site agricultural operations resulting from implementation of the project.
- To address consistency with General Plan policies pertaining to agriculture.
- To determine the significance of cumulative impacts to agricultural resources
- To identify project design elements and/or mitigation measures that would minimize significant adverse effects

1.2 Project Location and Description

[Subchapter 1.2.1 has been updated to clarify the project description.]

1.2.1 Project Description

The project would consist of a mix of residential, commercial, and institutional uses, along with parks and open space. Specifically, the project would include 90,000 square feet of commercial, office and retail uses, including a 50-room country inn; 903 traditional single-family detached residences; 164 single-family attached residences; 211 residential units within commercial mixed-use areas; 468 age-restricted residences within a senior citizen's neighborhood; necessary facilities and amenities to serve the senior population (including a

senior community center, and 200-bed group residential and group care facility); options for civic facilities, including a fire station and a school site (K-8); and public and private neighborhood parks, a private recreational facility, and other recreational amenities. The mixed-use, commercial, and civic uses, with parks, form a Town Center and two Neighborhood Centers, to which residents can walk for various social and commercial needs. As defined in the Lilac Hills Ranch Specific Plan, the residential component of the project consists of 1,746 units with an overall density less than 2.9 dwelling units per acre.

Also planned within the project site are a RF, a WRF, and other supporting infrastructure. Open space is proposed to retain some of the existing citrus and avocado groves, and allows 104.1 acres of sensitive resources including biological/wetland habitat.

The project application includes a Specific Plan (SP12-001), a General Plan Amendment (GPA 12-001), a Rezone (REZ 12-003), a Master Tentative Map (TM 5571 RPL 4), an implementing Tentative Map for Phase 1 (TM 5572 RPL 4), one site plan (S12-018 for Parks), and a MUP for the WRF (MUP 12-005). The project would be implemented in five phases. Additional discretionary permits may be needed to implement latter phases, as identified in the Specific Plan.

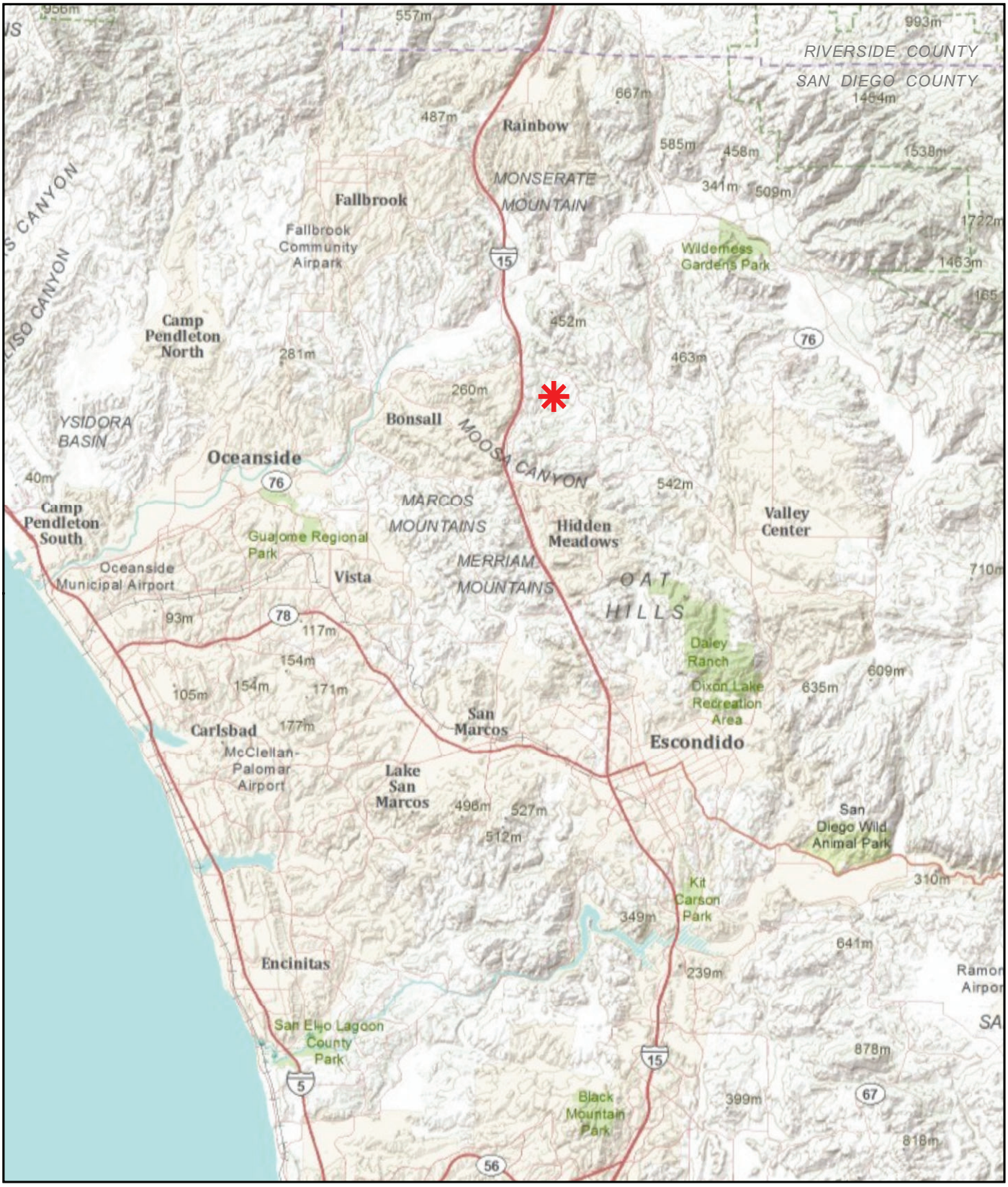
1.2.2 Project Location

The project site is located in the unincorporated portion of San Diego County in the westernmost portion of the Valley Center Community Plan Area and easternmost portion of the Bonsall Community Plan Area, and adjacent to I-15 and Old Highway 395, as illustrated on Figures 1 and 2. From the northwest project corner, West Lilac Road serves as the northern boundary of the project site, while Rodriguez Road serves generally as the project boundary to the south and east. From the southwest project corner, the western boundary of the project runs along Old Highway 395/Shirey Road and extends to Standell Lane. From there, the project site extends back to Shirey Road, which serves as the northwestern project boundary.

1.2.3 Project's Component Parts

1.2.3.1 Plan Amendments

In order to develop the proposed project, a number of land use changes to the General Plan, the Valley Center Community Plan, and Bonsall Community Plan are required. These include an amendment to the Regional Land Use Element Map, an amendment to the Valley Center Community Plan, an amendment to the Bonsall Community Plan, an amendment to the Regional Mobility Element, a rezone, adoption of the Lilac Hills Ranch Specific Plan, two tentative maps, two site plans, and a major use permit.



Project Location

FIGURE 1

Regional Location

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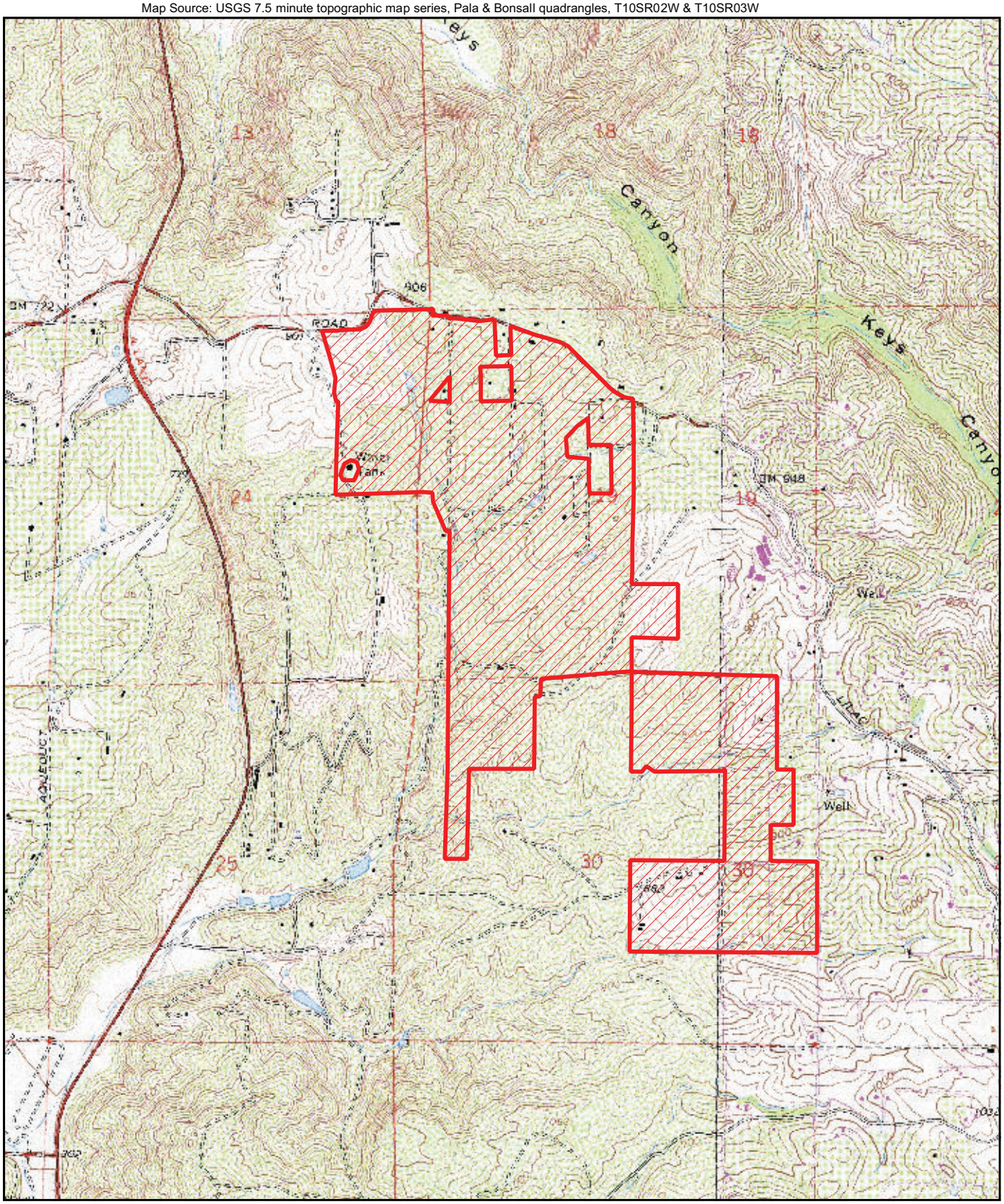
Map Source: USGS 7.5 minute topographic map series, Pala & Bonsall quadrangles, T10SR02W & T10SR03W



0 Feet 2,000

Project Boundary

RECON

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FIGURE 2

Project Location on USGS Map

1.2.3.2 Rezone

The majority of the project site, which lies within the Valley Center Community Plan Area, is zoned "Limited Agriculture"; the portion of the site, which lies within the Bonsall Community Plan Area, is zoned "Rural Residential". The project includes a Rezone (R12-003), as illustrated in Figure 3, which would replace the existing Rural Residential and Limited Agriculture Use Regulations with two new Use Regulations:

1. Outside of the Town Center and two Neighborhood Centers, the project site would be rezoned with the Urban Residential (RU) Use Regulation.

2. The Town Center would be rezoned with the General Commercial–Residential C34 Use Regulation, as would be the two Neighborhood Centers south of the Town Center and the RF.

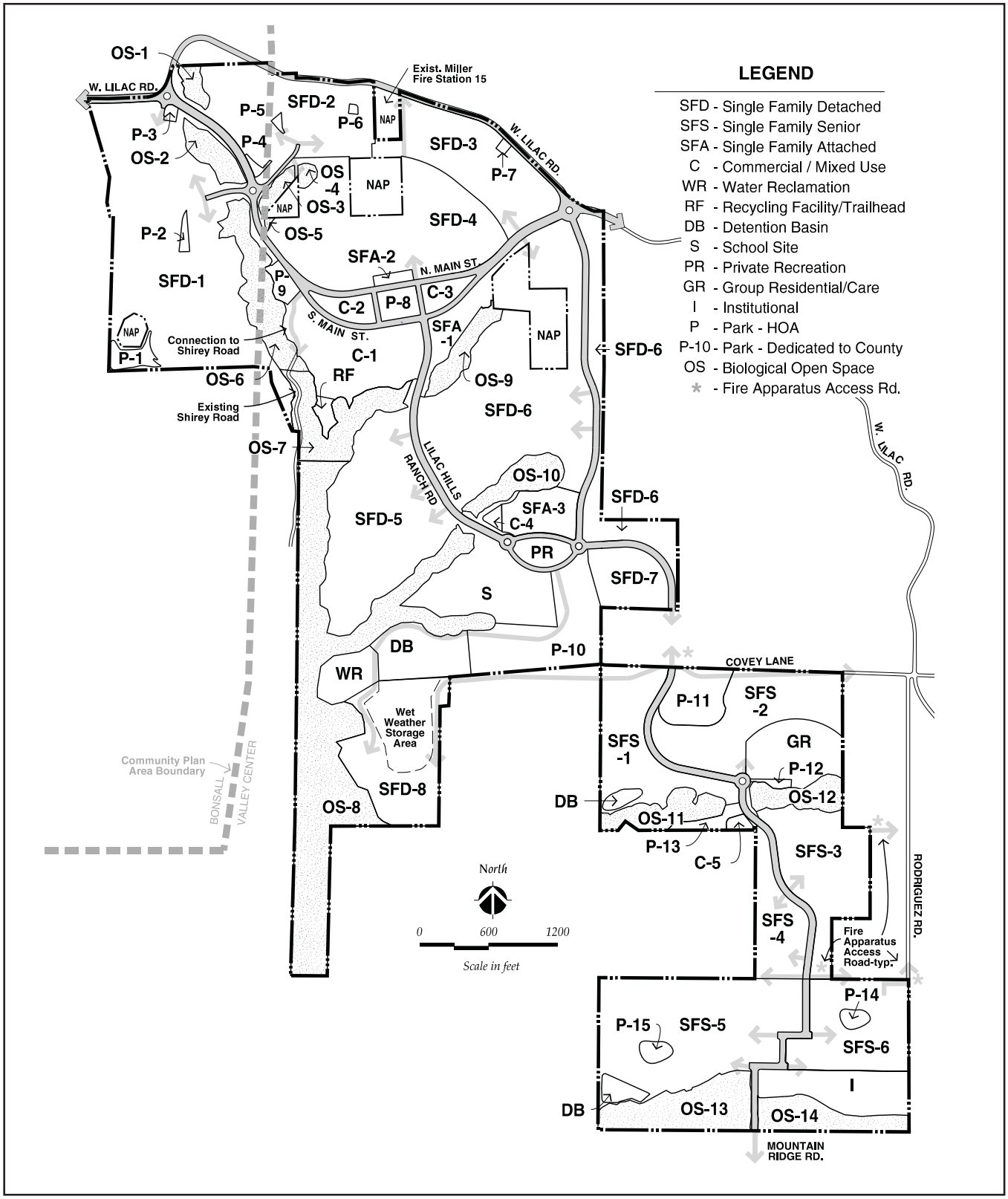
1.2.3.3 Specific Plan

This Specific Plan (SP12-001) provides the guidelines for implementation of the project, including future approvals and improvement plans, and establishes permitted land uses, densities, maximum number of residential units, required public facilities, and phasing and implementation mechanisms, and demonstrates compliance with applicable County policies. In addition to establishing regulations and zoning for the proposed planning areas, the Specific Plan also sets forth guidelines for the character and design of the project site, including architectural and landscape design guidelines.

a. Specific Plan Planning Areas

The project would be implemented in five phases, as discussed below. Table 1 provides a summary of the planning areas by category and their associated zoning.

Map Source: Vance and Associates, 2013



No Scale

FIGURE 3
Specific Plan Map

RECON

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TABLE 1
PLANNING AREA SUMMARY

Land Use	Planning Areas	Gross Acreage	Dwelling Units/ Square Feet (s.f.)
Single-family Detached	SFD	156.9	903
Single-family Senior	SFS	76.9	468
Single-family Attached	SFA	7.9	164
Group Residential/Group Care	GR	6.5	N/A
Commercial and Mixed-Use	C	15.3	211/ (90,000 s.f.)
K-8 School Site	S	12.0	N/A
Institutional Use	I	10.0	N/A
Parks - Dedicated to County	P10	13.5	N/A
Parks - HOA	P	10.1	N/A
Community Purpose Facility	CPF	2.0	N/A
Biological Open Space	OS	104.1	N/A
Common Areas/Agricultural Buffers	--	20.3	N/A
Manufactured Slopes	--	68.2	N/A
Circulating and Non-Circulating Roads	--	83.3	N/A
Water Reclamation Facility	WRF	2.4	N/A
Recycling Facility/Trail Head/Staging Area	RF	0.6	N/A
Detention Basins	DB	7.9	N/A
Wet Weather Storage	WWS	8.1	N/A
TOTAL		**608**	**1,746**

The Specific Plan map (Figure 4) shows the community divided into multiple planning areas with types of land uses ranging from single-family residential to biological open space. The phasing map (see Figure 3) shows how the community has been divided into five phases with Phase 1 at the northeast corner and Phase 5 in the southeast corner of the community.

Phase 1 encompasses 121.5 acres and would be located in the northern portion of the project site, adjacent to West Lilac Road. This area would include 352 single-family detached units, along with 4.5 acres of public pocket park(s).

Phase 2 would be located just south of Phase 1, is the only Phase which is entirely surrounded by the other phases of the project (Phases 1 and 3), and is not adjacent to any existing homes or parcels. The 89.6-acre area would include the location of the Town Center and a maximum of approximately 196 single-family detached units, 59 single-family attached units, and 211 mixed-use residential units; 80,000 square feet of commercial space; and 0.8 acres of park, and a 2.0-acre Village Green. The RF would also be located within this phase, south of the Town Center.

Phase 3 encompasses 223 acres and would be located directly south of Phase 2. This phase would include the construction of a maximum of 355 single-family detached and 105

single-family attached dwelling units and 7,500 square feet of commercial space. Also located within Phase 3 would be a 2.0-acre Community Purpose Facility area composed of a fire station and private recreational center not to exceed 40,000 square feet, combined. The WRF, a detention basin, and a 13.5-acre public park are also included with Phase 3.

Phase 4 would be located southeast of Phase 3. A total of 171 age-restricted/single-family detached homes and 2,500 square feet of commercial uses are proposed on 61.5 acres. Primary access to Phase 4 would be via Lilac Hills Ranch Road from Phase 3. Covey Lane would provide alternative access, and secondary emergency access would be provided via Street "B", connecting to Rodriguez Road on the east. Also proposed within Phase 4 are a 3.3-acre senior center, a private park, a 200-unit Group Residential/Group Care facility (these units are permitted to have small private kitchens in addition to the facility group kitchen), a half-acre pocket park, and a detention basin.

Phase 5 would be located directly south of Phase 4. Phase 5 would include 297 age-restricted/single-family senior detached homes, 2,500 square feet of commercial space, and 10.0 acres for a religious/institutional use. Also included in Phase 5 is a detention basin. Primary access would be from a connection to Lilac Hills Ranch Road constructed in Phase 4 to the north, and a secondary fire apparatus access road would be provided via Rodriguez Road to the east and Mountain Ridge Road to the south for the Institutional parcel. Mountain Ridge Road is planned to be a gated road that will be accessible only by a portion of Phase 5 residence and opened during emergencies to facilitate evacuation of residents in the area during an emergency.

b. Construction

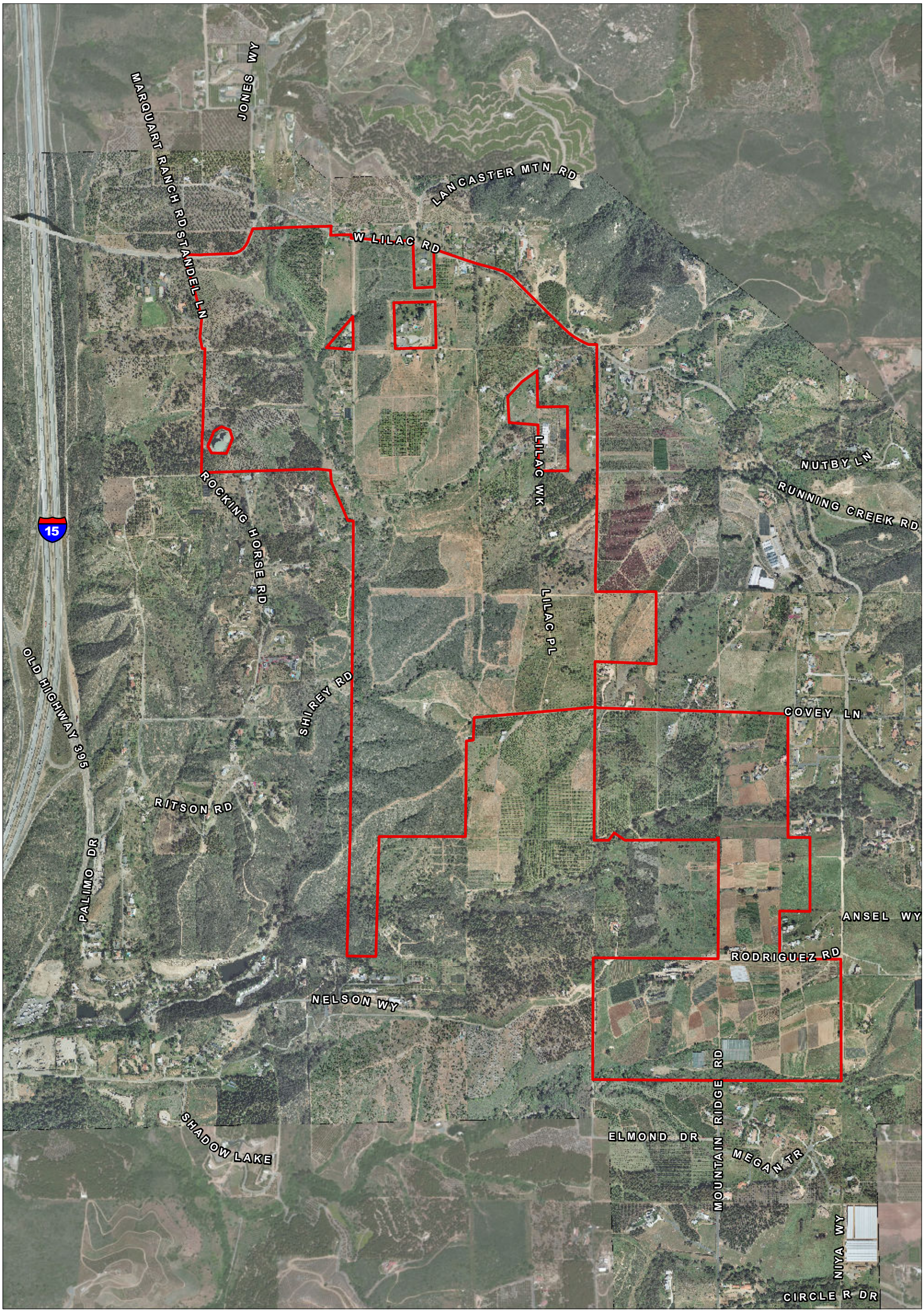
Infrastructure

Required roadway improvements and storm drains would be constructed in phases to ensure that improvements are in place at the time of need. The Specific Plan and Traffic Impact Study prepared for the project detail when roadway improvements occur in relation to residential occupancies of the phases. Water and wastewater facilities, along with dry utilities, would be phased as the residential units are occupied.

On-Site

The project would require on-site grading and improvements, including fuel modification zones, on 505.3 acres of the site, as depicted on the conceptual grading plan. Both cuts and fills are proposed within each grading area. Fill material would be transferred between the areas as required.

Image source: Custom image provided by client (flown March 2012), and Microsoft, All Rights Reserved (flown May 2010)



Project Boundary

FIGURE 4

RECON

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Aerial Photograph of Project Location

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All grading would be balanced on-site. The maximum (worst case) grading/construction conditions assume that 10 acres per day per phase would be actively graded[1]. It is assumed blasting would occur by phase and would occur at various times during each phase as the grading reaches an appropriate depth. Rock crushing would be required and would occur on-site, as needed, for continuous periods of less than 30 days.

Grading would be balanced with an estimated 4.07 million cubic yards (cy) of cut and fill (less than 2,300 cy per home), without the need for export or import of soil. The majority of cut and fill slopes would be approximately 10 feet, and approximately 85 percent of all cubic yardage moved would be less than 20 feet deep. The grading plan also includes three hydromodification basins, located throughout the project site.

On-site grading quantities by phase are shown in Table 2, below. A detailed grading plan has been prepared for only Phase 1, in conjunction with the Tentative Map. Grading plans also would be required in conjunction with Tentative Maps for future phases.

TABLE 2
GRADING QUANTITIES BY PHASE (cy)

Phase	Cut	Fill	Net
1	715,000	860,000	(145,000)
2	635,000	830,000	(195,000)
3	1,815,000	1,260,000	555,000
4	295,000	420,000	(125,000)
5	610,000	700,000	(90,000)
TOTAL	4,070,000	4,070,000	-

cy = cubic yards

c. Off-site Roadway Improvements

The project would be required to make improvements to off-site roadways, as described below.

- West Lilac Road provides regional access to Lilac Hills Ranch and forms the northern boundary of the project. From the project, West Lilac Road leads directly west to the Walter F. Maxwell Memorial Bridge over I-15 with access to the freeway both north and south and to State Route 76 heading west and east. The project would be required to make improvements along the northern project boundary

[1]This is based on a 50,000 cubic yard a day cut, transport, and spread. (50,000 cy/27=X/10 ft=Y/43,560 sq ft =Z acres * 3 activities = ~10 acres, then assume a max of two crews working on site for 20).

frontage as well as from the project entrance west to the intersection with Old Highway 395.

- Lilac Hills Ranch Road: This private easement connection is located immediately north of Covey Lane for a distance of approximately 500 feet. This 62-foot easement would be improved off-site on a parcel of land owned by the owners of Lilac Hills Ranch and would provide connection between Phases 3 and 4 of the project.

- Street B: This private easement connection is located approximately 1,500 feet to the south of Covey Lane along the eastern boundary of the project site, within the central portion of the Senior Citizen Neighborhood (Phase 5) of Lilac Hills Ranch. This private easement would provide access easterly to Rodriguez Road just south of the West Lilac Road and Covey Lane intersection.

- Mountain Ridge Road: This private easement connection is located at the southerly terminus of Lilac Hills Ranch Road as it exits the Senior Citizen Neighborhood in Phase 5. This private easement would provide access for the southern portion of the Senior Citizen Neighborhood to Circle R Drive, a County maintained public road with access to the west to Old Highway 395.

- Covey Lane: Located about half way down the eastern boundary of Lilac `Hills Ranch is an on-site private road connecting to a public right-of-way/easement on the eastern end of Covey Lane just west of West Lilac Road. The off-site public portion of this road would be improved within an existing road easement.

- Gopher Canyon Road/I-15 Intersection: Both the northbound and southbound ramps at this intersection would be signalized.

- Rodriguez Road. This 40-foot-wide graded road easement would be paved 24 feet from Lilac Hills Ranch Road to Covey Lane.

- Miller Station (CAL FIRE Station 15): Additional off-site improvements may occur on the site adjacent to the project site where an existing fire station is located.

1.3 Analysis Methods

The methodology in this analysis includes the following steps:

- Review or use of the following informational sources or documents: (1) California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (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; (8) biology report; and (9) San Diego County General Plan, Community Plan, and Zoning Ordinance documents.

- Utilize the Local Agricultural Resource Assessment (LARA), to assess the relative value of agricultural resources in San Diego County.
- Indicate the percentage (or acreage) of significant agricultural structures or infrastructure, 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 consistency or conflicts.
- Evaluate indirect impacts on- and off-site, as a result of project implementation, and determine whether agricultural conversion will occur indirectly.
- Discuss potential land use conflicts, between ongoing agriculture as it is phased-out, and new development is phased-in.
- Discuss long-term viability and protection of agricultural lands, which are proposed to be retained, within the project.

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 the County Agricultural Resources Guidelines (see subchapter 5.1).

This agricultural report discusses in detail any feasible mitigation measures that would reduce anticipated significant impacts ~~to levels below significance, and where appropriate,~~ and 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; whether the potential impacts can be mitigated to a level below significance; recommends mitigation; and includes a brief summary conclusion.

1.4 Environmental Setting

1.4.1 Regional Context

The project site is located approximately 9 miles south of the San Diego/Riverside County line, within the unincorporated area of northern San Diego County, within the Valley Center Community Plan area. A small portion of the site is within the southeastern portion of the Bonsall Community Plan area. Fallbrook, Bonsall, Camp Pendleton, and Oceanside are to the west; Escondido, Vista, Hidden Meadows, and San Marcos lie to the south and southwest; Valley Center is located to the southeast; and the Cleveland National Forest is located to the east and northeast. The Pala-Pauma Community Plan area lies to both the north and east, and the North County Metro Community Plan area lies to the south. Several hundred homes of varying types exist in the area surrounding the project site, including farm homes on large parcels with citrus and avocado groves, and detached single-family homes, on lots ranging from 0.5-acre to 2-acre parcels.

The land uses within closer proximity (within an area roughly bounded by West Lilac Road to the east and north, Circle R Drive to the south, and I-15/Old Highway 395 to the west) are composed primarily of agriculture (primarily orchards and nurseries, but also row crops), low density rural residential, and undeveloped land (primarily chaparral) (Figure 4). To the southwest of the project site lies the Champagne Lakes R.V. Resort, and beyond that is the Circle 'R' Resort Specific Plan area containing the Castle Creek Inn and Resort as well as single- and mixed-use residential and a golf course.

The topography of the project area is characterized by the east-west San Luis Rey River Valley, along the State Route 76 corridor and the north-south I-15 corridor. Both the San Luis Rey River floodplain and the I-15 corridor are flanked by rolling hills, which have historically been used for citrus and avocado groves, estate residences, undeveloped land, and cattle grazing in the more rugged terrain. Recently, several agencies have established habitat preserves and open space with the purchase of land and dedication of biological or open space easements.

The topography within the project site is consistent with the inland foothills and valleys found in this part of San Diego County. The project site includes a series of rolling hills dissected by drainage courses (several of which are shown as blueline streams on the USGS map) and a valley bottom that drains primarily to the south and southwest. The area is mostly gentle topography, with some steep slopes along the lower riparian areas. The San Luis Rey River valley is less than 2 miles northwest of the project site, and Moosa Canyon is a short distance to the southwest ~~of the project~~; Keys Canyon is a short distance of the northeast.

Figure 5 shows the most recent farmland data within the project site and surrounding area (CDC 2010). According to the Important Farmlands Inventory Map, the project site and vicinity includes the following farmland classifications: Unique Farmland, Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Other Land, and Urban and Built-up Land; the Unique and Farmland of Local Importance designations comprise the majority of the project site.

1.4.2 On-site Agricultural Resources

The primary land uses found in the project area are agricultural related, with the project site currently supporting several different types of crops, including citrus, row crops, and avocados. Agricultural lands cover the majority of the southeastern, east-central, and northern portions of the project area (Figure 6). The northern and central agricultural areas consist of orchard crops (primarily citrus and avocado) with some small areas of vineyard and nursery, while the southern concentrations of existing agricultural uses are primarily labor intensive row crops (vegetables and strawberries). The small area of mapped vineyard supports varieties of grape. An area used to produce stock for the commercial nursery business is located near the northwestern part of the site.

Vegetation communities and habitat types that are found on the project site occur as a mosaic of native habitat patches and agricultural uses. Native habitat occurs primarily along the drainage courses and on some of the steeper terrain on the western and southwestern portions of the project site. A total of 17 primary habitat types and vegetation communities were identified by the project biological resources technical report (RECON 2014). The largest areas of native habitat are primarily southern mixed chaparral, with southern coast live oak riparian woodland, southern willow riparian woodland, and southern willow scrub occurring within the drainages. The developed areas consist primarily of scattered residences with ornamental landscaping.

The parcels, within the 608 acres of the project site, are all privately owned, as are the majority of the surrounding parcels, with the exception of the freeway corridor and the fire station, on West Lilac Road. Two relatively small areas in the project site are within open space easements. There are no Williamson Act contract lands or agricultural preserves within the project site; however, as discussed in more detail in subchapter 1.4.3.2 ~~below~~, there is an agricultural preserve located adjacent to the southeast corner of the project site. Additionally, there are lands under Williamson Act contract approximately ¾ of a mile to the northeast.

Elevations across the project site range from 960 feet mean sea level at the highest to 590 feet mean sea level at the lowest. The project site is generally characterized by relatively flat, ~~marginal~~ agricultural lands in the southeast and gently rolling knolls, with steeper hillsides and ridges running north and south along the western edge. The drainage courses on the site convey storm water and urban/agricultural runoff. Both intermittent and

ephemeral drainages occur on the project site. Wells occur in scattered locations across the site and are used to provide water to the orchards, vineyards, and other agricultural areas. A few agricultural ponds that store water for irrigation purposes occur on the project site.

1.4.2.1 Soils

The U.S. Department of Agriculture (USDA) 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 soils types, their physical characteristics and limitations, and their suitability for agriculture and other uses. The Soil Conservation Service 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, and 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.

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, as follows: (0) sand and gravel in the substratum; (1) erosion hazard; (2) wetness caused by poor drainage or flooding; (3) slow or very slow permeability; (4) coarse texture or excessive gravel; (5) fine or very fine textured soil; (6) salts or alkali; (7) cobblestones, stones or rocks; (8) nearly impervious bedrock or hardpan; and (9) toxicity or low fertility. 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 expresses numerically 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, whereas at the other end of the scale, grade 6 (i.e., index rating of less than 10) consists of soils that generally are not

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DULIN RD
SAN REY LN
LAKE CIRCLE DR
DULIN RD
S OLD HIGHWAY 395
LANCASTER MTN RD
OLD OAK HOLLER
COUSER CANYON RD
CAM DEL VENADO
MOUNTAIN VIEW RD
MESA LILAC RD
W LILAC RD
CALLE ORO VERDE
NUTBY LN
RUNNING CREEK RD
AQUADUCT RD
Lilac Hills Ranch
Road Improvements
COVEY LN
CALLE DE TALAR
RITSON RD
Street B Improvements
LILAC RIDGE RD
OLD HIGHWAY 395
NELSON WY
MOUNTAIN RIDGE RD
LAL BAGH LN
CAM DEL REY
CIRCLE R DR
CIRCLE R LN
ANDREEN RD
SPEARHEAD TL
CAM DE LAS LOMAS
KRISTEN WY
EL CAM DE PINOS
GOPHER CANYON RD
HOLLYHILL RD
OLD CASTLE RD
CASTLERIDGE RD

Project Boundary
1 Mile Buffer
Off-site Improvement Areas

FMMP Classification (2008)

Farmland of Local Importance
Prime Farmland
Unique Farmland
Farmland of Statewide Importance
Other Land
Urban and Built Up Land
Grazing Land *

* None Present in Project Area

0 Feet 2,000

FIGURE 5

Regional FMMP Resources

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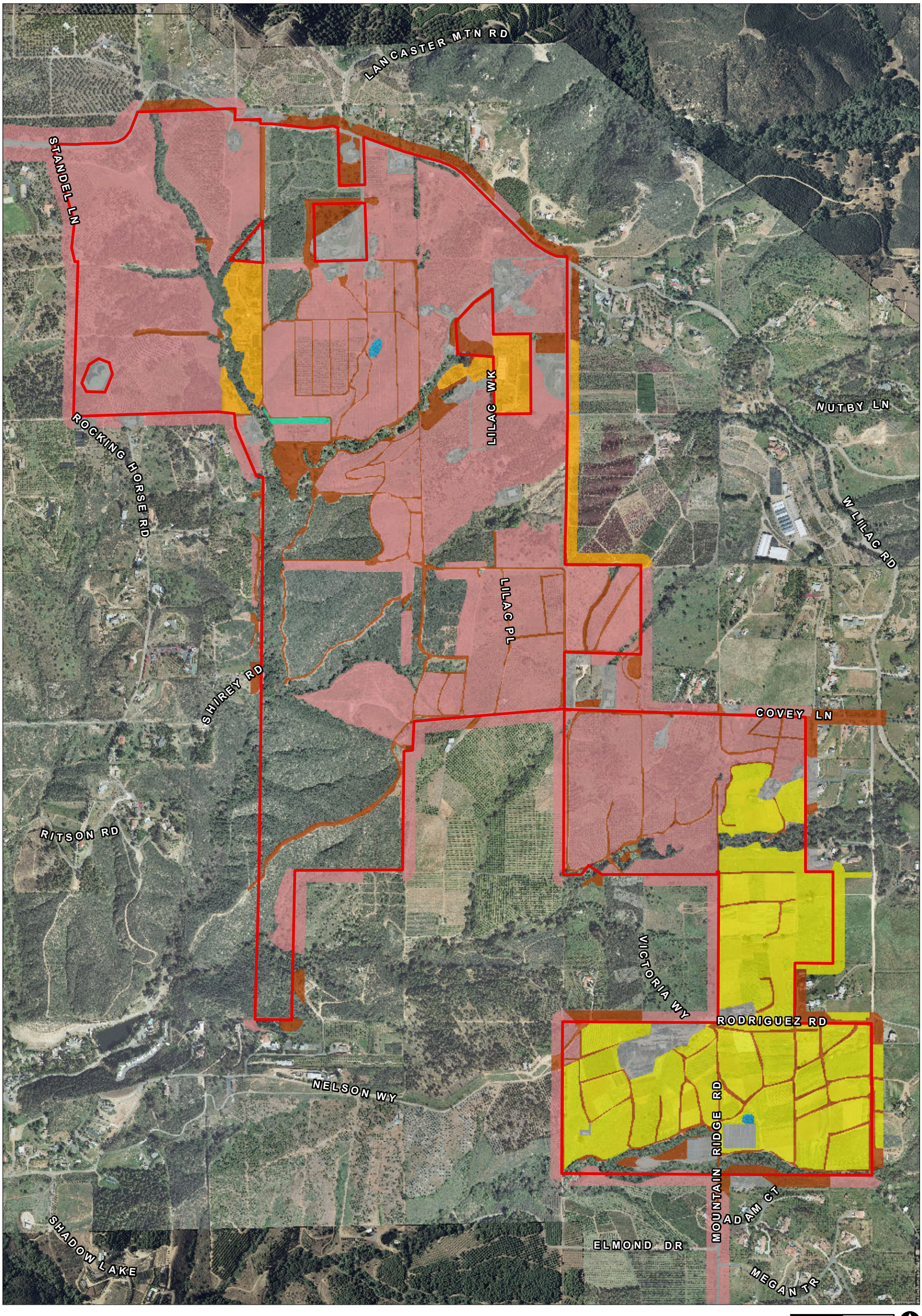

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FIGURE 6

Existing On-site Agricultural Resources

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suited to farming. The spatial distribution of soil types/units on the project site is shown in Figure 7 (S~~AN~~anGIS 201~~4~~2). 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 3~~1~~. Their characteristics are taken from the USDA Soil Surveys for San Diego County (1973).

The CDC publishes a list of soils that meet the soil quality criteria for Prime Farmland soils and soils of Statewide Importance. The soil criteria are defined by the NRCS and are unique to each county. These soil criteria include a much broader range of soils than the Prime Agricultural Land definition in Government Code section 51201(c). Within Table 3~~1~~, an asterisk (*) next to the soil type indicates a Prime Farmland soil, and a carrot (^) next to the soil type indicates a soil of Statewide Importance.

Soil types within the project site and vicinity consist of a series of sandy loam, coarse sandy loam, rocky sandy loam, and steep gullied land (USDA 1973; ~~San Diego Geographic Information Source 2012~~). Sandy loam and coarse sandy loam soils in the following soil series are present: Bonsall, Cieneba, Fallbrook, Greenfield, Placentia, and Visalia (see Figure 7). Soils on steeper slopes and in gully bottoms are characterized as steep gullied land. These soil types are derived from weathered and decomposed granite or granodiorite. Runoff is described as moderate to rapid and the erosion hazard is moderate to high for these soil types.

Additionally, as shown on Table 3~~1~~, each soil type is categorized based on the County of San Diego Agricultural Guidelines, which utilize a system to determine, which soils are unavailable for agricultural use. Pursuant to the established Guidelines, soils “unavailable for agricultural use” include:

1. Lands with existing structures (paved roads, homes, etc.) that preclude the use of the soil for agriculture;

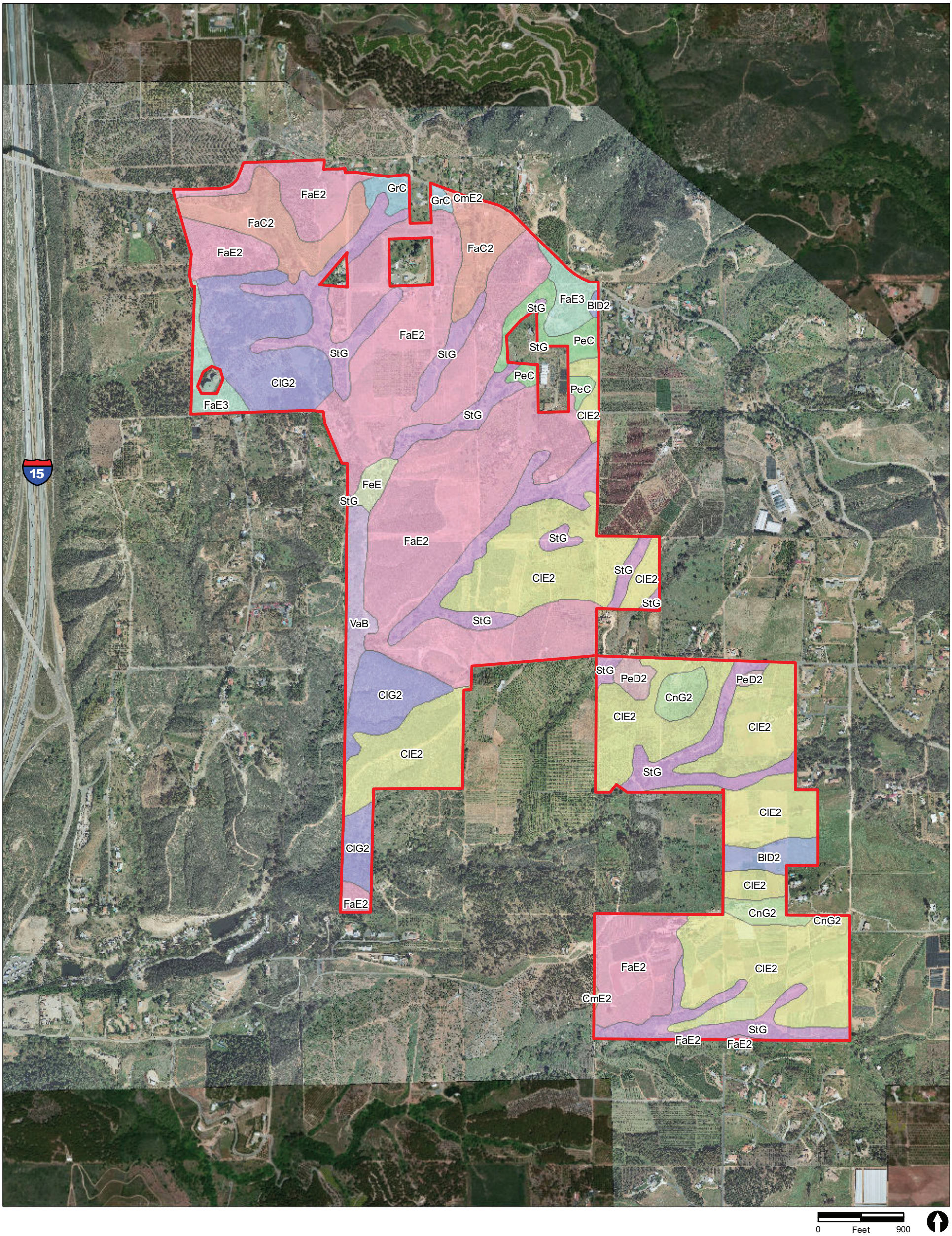
2. Lands that have been disturbed by activities such as legal grading, compaction, and/or placement of fill such that soil structure and quality have likely been compromised (e.g., unpaved roads and parking areas);

3. Lands that are primarily a biological habitat type that have never been used for agriculture; and

TABLE 31
ON-SITE SOIL RESOURCES

Soil Map Unit	Project Acres	LCC	Storie Index	Available for Agriculture	Unavailable for Agriculture	Proportion of Site Available	Prime or Statewide 1 for Yes; 0 for No	Matrix Score
Bonsall sandy loam, 9 to 15 percent slopes, eroded^	7.15	IVe-3(19)	39	~~6.93~~ 7.15	~~0.22~~ 0	0.01~~87~~	1	0.01~~87~~
Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes	168.73	VIIe-7(19)	7	115.88	52.85	0.292	0	0.000
Cieneba coarse sandy loam, 15 to 30 percent slopes, eroded	53.43	VIe-1(19)	15	32.01	21.42	0.081	0	0.000
Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded	0.24	VIIe-1(19)	6	0.16	0.08	0.000	0	0.000
Cieneba rocky coarse sandy loam, 9 to 30 percent slopes, eroded	9.86	VIIs-8(19)	10	7.56	2.30	0.019	0	0.000
Fallbrook rocky sandy loam, 9 to 30 percent slopes	3.41	VIe-7(19)	13	0.84	2.57	0.002	0	0.000
Fallbrook sandy loam, 15 to 30 percent slopes, eroded	210.14	VIe-1(19)	35	148.80	61.34	0.374	0	0.000
Fallbrook sandy loam, 5 to 9 percent slopes, eroded^	32.59	IIIe-1(19)	51	27.38 ~~25.24~~	5.21 ~~7.36~~	0.068 ~~0.063~~	1	0.068 ~~0.063~~
Fallbrook sandy loam, 9 to 30 percent slopes, severely eroded	12.94	VIIe-1(19)	37	10.72	2.22	0.027	0	0.000
Greenfield sandy loam, 5 to 9 percent slopes*	4.46	IIe-1(19)	77	~~0.94~~ 1.38	3.08~~52~~	0.00~~32~~	1	0.00~~32~~
Placentia sandy loam, 2 to 9 percent slopes^	10.20	IVe-3(19)	49	~~6.97~~ 9.9	~~3.23~~ 0.3	0.02~~418~~	1	0.02~~418~~
Placentia sandy loam, 9 to 15 percent slopes, eroded	3.93	IVe-3(19)	41	3.75	0.18	0.009	0	0.000
Steep gullied land	81.46	VIIIe-1(19,20)	<10	40.44	41.02	0.102	0	0.000
Visalia sandy loam, 2 to 5 percent slopes*	8.98	IIe-1(19)	81	~~0.14~~.5	8.~~84~~48	0.00~~10~~	1	0.00~~10~~
TOTAL	607.53			406.47 ~~400.38~~	201.05 ~~207.15~~	1		~~0.100~~ 0.115

LCC = Land Compatibility Classification
*Prime farmland soil.
^Farmland of statewide importance soil.



Project Boundary

Soil Classification

- BlD2 - Bonsall sandy loam, 9 to 15 percent slopes, eroded
- ClE2 - Cieneba coarse sandy loam, 15 to 30 percent slopes, eroded
- ClG2 - Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded
- CmE2 - Cieneba rocky coarse sandy loam, 9 to 30 percent slopes , eroded
- CnG2 - Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded
- FaC2 - Fallbrook sandy loam, 5 to 9 percent slopes, eroded
- FaE2 - Fallbrook sandy loam, 15 to 30 percent slopes, eroded
- FaE3 - Fallbrook sandy loam, 9 to 30 percent slopes, severely eroded
- FeE - Fallbrook rocky sandy loam, 9 to 30 percent slopes
- GrC - Greenfield sandy loam, 5 to 9 percent slopes
- PeC - Placentia sandy loam, 2 to 9 percent slopes
- PeD2 - Placentia sandy loam, 9 to 15 percent slopes, eroded
- StG - Steep gullied land
- VaB - Visalia sandy loam, 2 to 5 percent slopes

FIGURE 7

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Soil Types within the Project Area

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4. Lands constrained by biological conservation easements, biological preserve, or similar regulatory or legal exclusion that prohibits agricultural use." Figure 8 graphically shows portions of the project site (and the corresponding soils) that are unavailable for agriculture.

1.4.2.2 FMMP Farmland Designations

The FMMP is implemented by the CDC, 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, which 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* (~~FMMP~~ CDC 2010~~08~~).

The last statewide update was completed in 2008 and reflects land use changes to agriculture, through the year 2006. Figures 5 and 9 show the most recent farmland data, within the surrounding area and project site, respectively. These include lands designated as Prime and Unique Farmlands, Farmland of Statewide and Local Importance, Grazing Land, Urban and Built-up, and Other Land (~~FMMP~~ CDC 2010~~08~~).

The USDA, 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 5. Farmland categories are based on soil types, current use of the land, and availability of irrigation water. The project site's Important Farmland Map Categories and the acreage of the FMMP categories are described below and shown on Figure 9.

a. 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 NRCS mapping. The project site does not contain any land designated as prime farmland.

b. 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 36.2 acres of Farmland of Statewide Importance (6 percent).

c. 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 331.2 acres of Unique Farmland (54 percent).

d. 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. There are 146.4 acres of Farmland of Local Importance (24 percent) within the project site.

e. 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 and borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides, by urban development and greater than 40 acres is mapped as Other Land. There are approximately 95.9 acres of land designated as Other Land within the project site, or approximately 16 percent of the total project acreage.

f. 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. There is no grazing land within the project site.

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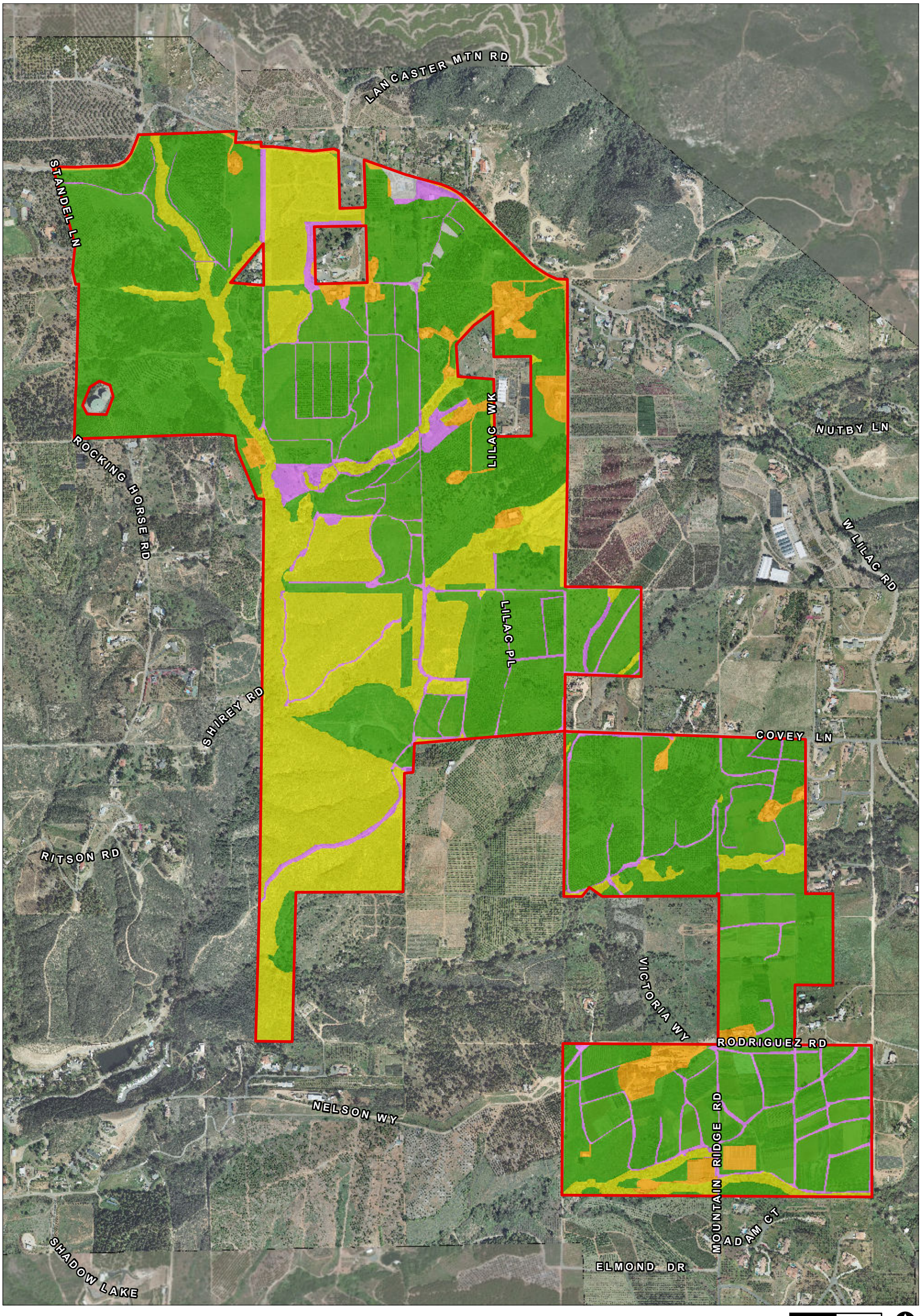

FIGURE 8

Soils Available for Agriculture

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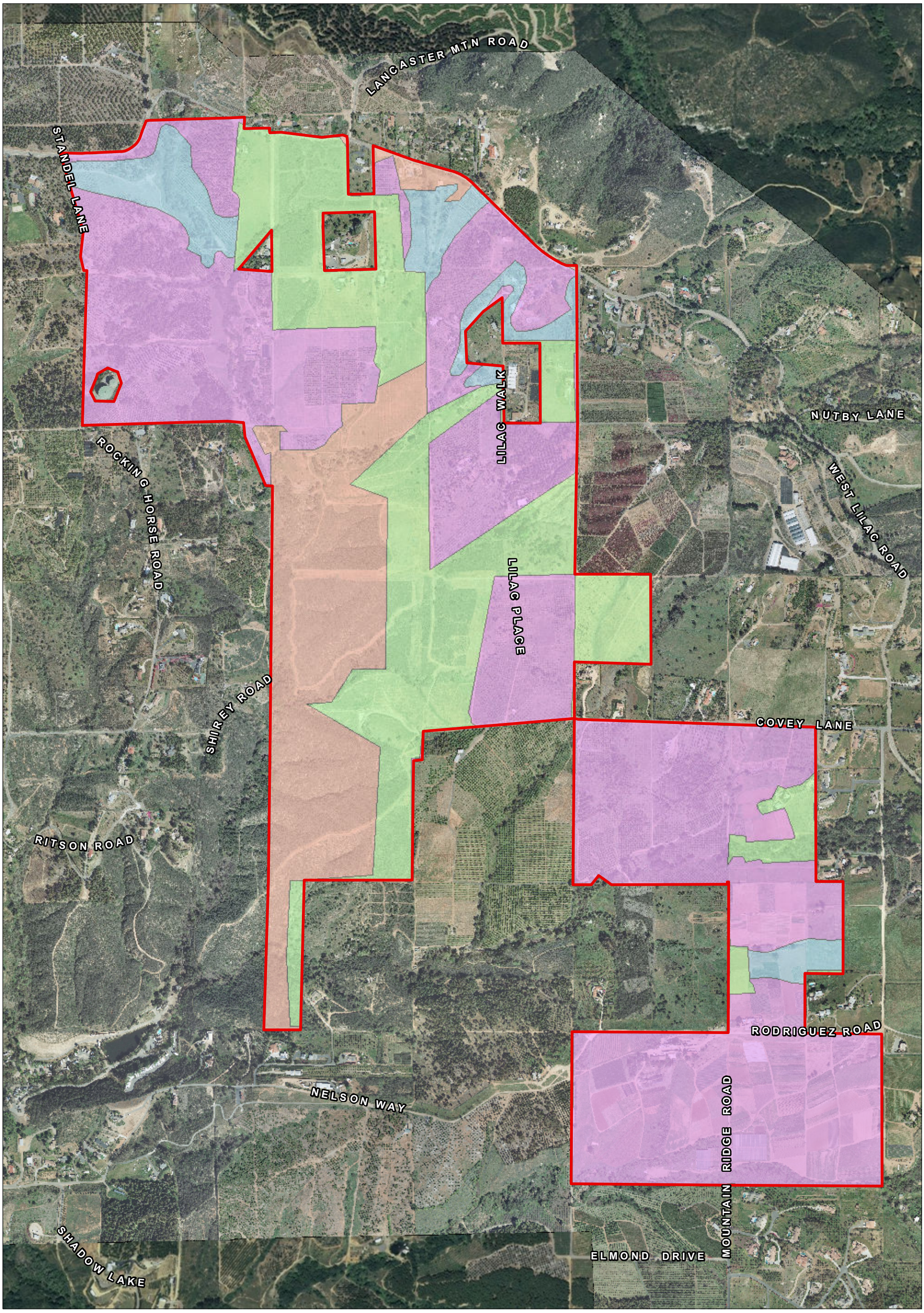

FIGURE 9

FMMP Within the Project Site

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Table 42 depicts the approximate acreage, for each of the FMMP categories, within the project site and shows them as a percentage of the total project site.

TABLE 42
ACRES OF FMMP FARMLAND ON-SITE AND
AS A PERCENT OF THE ENTIRE PROJECT SITE

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

1.4.2.3 History of Agricultural Use

Development within the project area began, prior to 1901, as there are five structures on, or within the vicinity of, the project site according to 1901 USGS surveys reviewed, by Affinis during preparation of the cultural resources report. There are eight houses still remaining (as of 2011) on-site that are estimated to be over 45 years old; however, most of these houses do not appear on the 1946 or 1953 aerial photographs. In the 1963 aerial photograph, there is evidence of some orchards in the northeastern and southern portions of the site, but the beginnings of the present pattern of agricultural production is not evident, until the 1975 aerial photograph. Agricultural use appears to continue expanding through the 1970s and 1980s, with the northern portions being heavily used for orchard crops (primarily citrus and avocado) while the southern portion is primarily used for row crops.

a. Crop Types

The primary crops on-site are orchard crops (293 acres) consisting primarily of citrus (lemon and orange) trees and avocado groves. The second largest crop type, by acreage, is row crops (vegetables and strawberries), which comprise approximately 91 acres of the site. There are also approximately 9.6 acres of nursery uses and 0.66 acre of vineyards on-site. Avocados and lemons were among the top 10 crops (by value) grown within San Diego according to the 2010 Crop Statistics & Annual Report prepared by the San Diego County Department of Agriculture, Weights and Measures (AWM). Avocados were fourth with a value of $147 million, and lemons were seventh with a total value of $40 million. It is unknown what type of crops are grown at the nurseries, but “ornamental trees and shrubs” and “indoor flowering and foliage plants” were the number one and two crops (by value) grown in San Diego County in 2010, with total values of $418 million and $293 million, respectively. Citrus crops (grapefruit, kumquats, lemons, limes, oranges, and tangerines)

generated $78 million during 2010. By acreage, avocados comprise the largest category of any crop type in the County, except for livestock grazing, with over 19,000 acres harvested, in 2010.

b. Pesticide Use

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

State pesticide regulations prohibit discharging pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. There are also regulations and label requirements that prevent or minimize "drift" during aerial applications. Drift is the airborne transportation of residual pesticides, during or after pesticide application, via aerial or ground spraying, onto adjoining properties or onto roadways, trails or other routes travelled, by the general public. Drift is a primary concern for neighboring property owners and the public, due to the possibility that pesticide drift may contribute to health concerns. If the CAC decides that substantial harm is likely (e.g., "drift"), the permit applicant may be required to evaluate alternatives (including not using a pesticide at all), or the CAC may impose extra controls designed to reduce the risk of harm, to people or the environment. The CAC must deny a permit application, if it is determined that use of the pesticide may harm people or the environment and no restrictions are available to mitigate that harm. Because the applicant can appeal the denial, the CAC's decision must be well-substantiated and documented.

<u>The requirements in place for aerial pesticide applications are equally stringent and regulated at a local level by the CAC. A pilot must obtain the following to complete aerial applications within the County: a Qualified Applicator License; an Agricultural Pest Control Business License; and a Pest Control Aircraft Pilot Certificate. The pilot must also complete continuing education classes in order to renew the license. In order to attain the license, the pilot must understand and properly apply principles intended to maximize safety and minimize drift. These include guidelines and regulations for pre-application notification, calibration of equipment, droplet size, maximum wind speed, application speed, application height (altitude), ferrying to and from the job site, buffer zones, dilution, flow rate/volume per acre, spray patterns, and the purpose and toxicity of each particular pesticide to be applied.</u>

In addition, because the control of drift is always a priority, either an on-site ground crew "flagger" or smoke generator is used to provide direction to the pilot regarding wind direction and wind speed. Geographic Positioning Systems (GPS) are used to give the pilot precise data about swath locations such that only the minimum effective amount of the pesticide is applied. If the pilot is unfamiliar with the application site, the recommended procedure is for the pilot to scout the area for proximity to both flight hazards and also environmentally sensitive areas, such as lakes, streams, and riparian habitats or locations where people gather (e.g., schools, playgrounds, shopping centers).

AWM inventories pesticide use permits per parcel number. The agricultural chemical products applications on the project site, or within 1.5 miles of the project site, within the last five years are mapped on Figure 10 and include the following (County of San Diego AWM, July 2012) products:

- 26 GT FUNGICIDE
- 3336 WP TURF
- ABAMECTIN E-PRO 0.15 EC INSECTICIDE
- ABBA 0.15 EC
- ACCORD SP HERBICIDE
- ACEPHATE 90 WDG
- ACEPHATE 97UP INSECTICIDE
- AGRI-MEK 0.15 EC MITICIDE/INSECTICIDE
- ALIETTE WDG
- AVID 0.15EC MITICIDE/INSECTICIDE
- BOND MAX
- CHIPCO 26019 FLO BRAND FUNGICIDE
- CHIPCO BRAND 26GT FLO FUNGICIDE
- CHIPCO RONSTAR 50 WSP HERBICIDE
- CLEAN CROP DIMETHOATE 400
- CMR SILICONE SURFACTANT
- CONSERVE SC
- CONSERVE SC TURF AND ORNAMENTAL
- CREDIT XTRA MIXED SALT SYSTEMIC HERBICIDE
- CYGNUS 50 WG
- DACONIL ULTREX
- DACONIL ULTREX TURF CARE
- DEADLINE BULLETS
- DEADLINE M-PS
- DECATHLON 20 WP
- GOURMET ANT BAIT
- GROUND SQUIRREL BAIT BY WILCO
- HERITAGE FUNGICIDE
- HOIST
- KONTOS
- LATRON B-1956
- LATRON B-1956 SPREADER STICKER
- LATRON CS-7
- LEAF LIFE GAVICIDE GREEN 415
- LI 700
- LORSBAN 4E INSECTICIDE
- MAD DOG PLUS
- MAKAZE
- MANICURE 6 FLOWABLE FUNGICIDE
- MEDALLION FUNGICIDE
- MESUROL 75-W
- MGK EVERGREEN PYRETHRUM CONCENTRATE
- MIRAGE PLUS
- MON-52249 HERBICIDE
- MON-65005 HERBICIDE
- MONTEREY SUPER 7
- M-PEDE
- NO FOAM A
- NUFARM CREDIT EXTRA
- OMNI OIL 6-E
- OMNI SUPREME SPRAY
- OROBOOST
- ORTHENE 97
- ORTHENE 97 ST

- GREENHOUSE AND NURSERY INSECTICIDE
- DELEGATE WG
- DIMENSION ULTRA 40 WP
- DIMENSION ULTRA WSP TURF AND ORNAMENTAL HERBICIDE (WITHDRAWN)
- DITHANE 75DF RAINSHIELD
- DITHANE DF
- DITHANE T/O TURF & ORNAMENTAL FUNGICIDE (WITHDRAWN)
- DREXEL CAPTAN 50W
- DREXEL DEFOL 6 W
- DREXEL DIMETHOATE 2.67
- DURSBAN 50W INSECTICIDE
- EAGLE 20 EW
- EAGLE 40WP
- EAGLE WSP TURF AND ORNAMENTAL FUNGICIDE
- ENTRUST
- EPI-MEK 0.15 EC (CA
- EPI-MEK 0.15 EC MITICIDE/INSECTICIDE
- EVERGREEN CROP PROTECTION EC 60-6
- FINAL PELLETED RAT AND MOUSE BAIT READY TO USE BAIT STATION
- FIRST CHOICE NARROW RANGE 415 SPRAY OIL
- FIRST CHOICE SLUGGO SNAIL AND SLUG BAIT
- FLOREL BRAND PISTILL
- FUNGICIDE
- FUNGO FLO
- GAVICIDE LIGHT MEDIUM SOLUBLE SPRAY OIL
- GAVICIDE-C
- GF-120 NF NATURALYTE FRUIT FLY BAIT
- GLY STAR PLUS
- GLYFOS BULK
- GLYFOS X-TRA HERBICIDE
- ORTHENE TURF, TREE & ORNAMENTAL SPRAY
- ORTHENE TURF, TREE & ORNAMENTAL SPRAY 97
- ORTHENE TURF, TREE & ORNAMENTAL WSP
- PAGEANT FUNGICIDE
- PRINCEP 4L
- PRINCEP CALIBER 90 HERBICIDE
- PYGANIC CROP PROTECTION EC 1.4 II
- QUEST
- RAMIK GREEN
- RANGER PRO HERBICIDE
- REAPER 0.15 EC
- REWARD AQUATIC AND NONCROP HERBICIDE
- ROUNDUP ORIGINAL HERBICIDE
- ROUNDUP ORIGINAL MAX HERBICIDE
- ROUNDUP POWERMAX HERBICIDE
- ROUNDUP PRO HERBICIDE
- ROUNDUP ULTRA HERBICIDE
- ROUNDUP WEATHERMAX HERBICIDE
- SAFARI 20 SG INSECTICIDE
- SCANNER
- SIMAZINE 90DF
- SPREADER-STICKER
- SUBDUE MAXX GR
- SUBDUE MAXX MC
- SUCCESS
- SULFUR DF
- SURFLAN A.S.
- TENKOZ BUCCANEER HERBICIDE
- TERRAZOLE CA
- T-METHYL E-PRO 50 WSB
- TRANSOM 50 WSB
- WFSI 2220
- WILCO GOPHER GETTER AG BAIT
- WILLOWOOD GLYPHOSATE 41%

Map Source: SanGIS, 2012

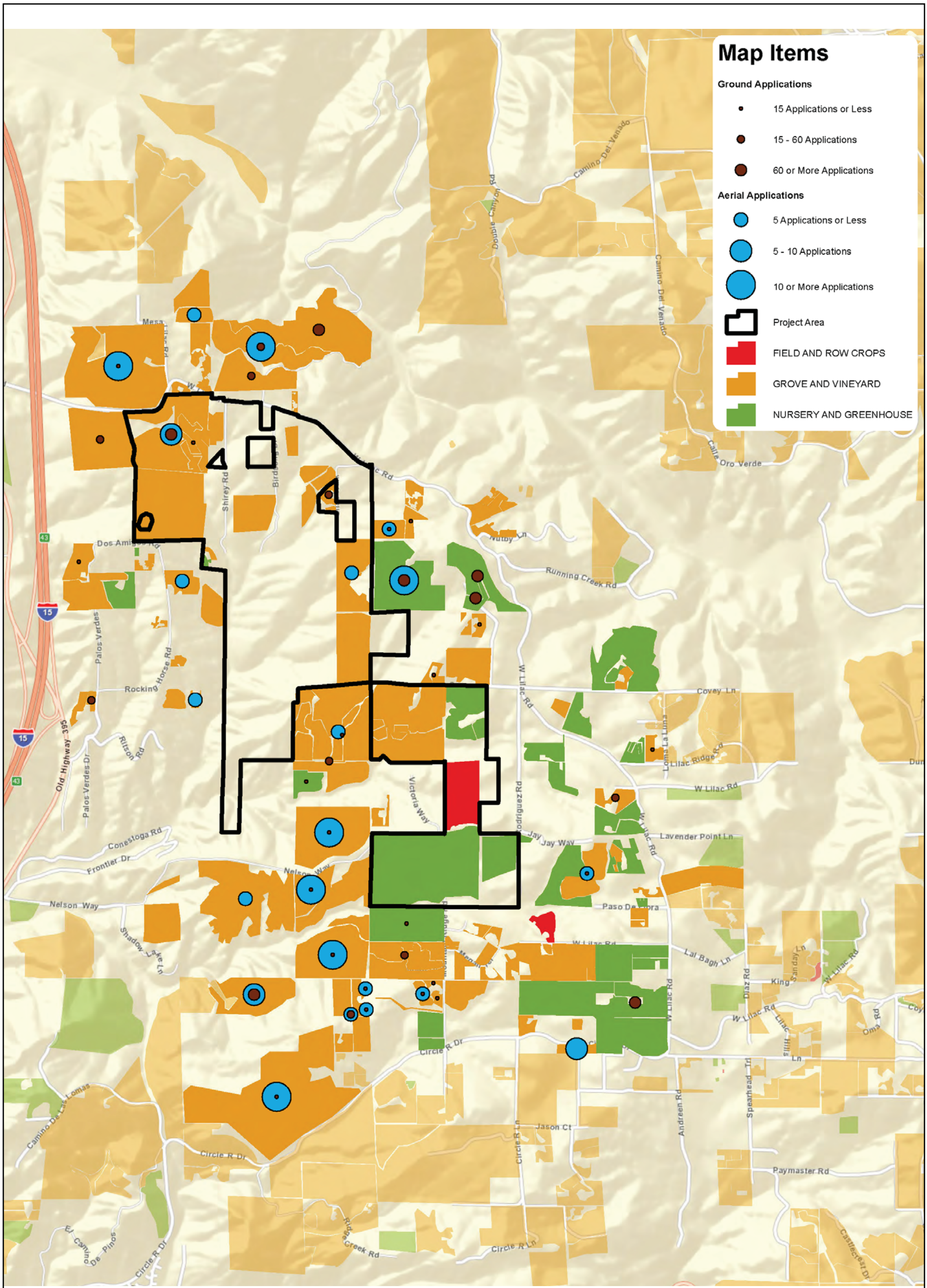

FIGURE 10
Pesticide Application Permits

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Phase I Environmental Site Assessments (ESAs) were prepared for the 17 properties that now comprise the project site. This subchapter presents a summary of those ESAs, prepared for the project by Environmental Equalizers, Inc. To provide some background, soils contaminated by agricultural activities are a concern because of land use changes involving

the construction of housing developments, on former agricultural lands. There is a potential that past agricultural activities may have contaminated soils and these soils may cause health concerns to the new homeowners who live on previously farmed land. As discussed in the Phase I ESAs, the agricultural activities, which have occurred across much of the project site, have included the application of fertilizers, herbicides, and pesticides. As such, most of the Recognized Environmental Conditions (RECs) investigated are associated with agricultural use.

The investigation of suspected pesticide contamination included soil sampling in areas where materials were stored, handled, and mixed, in addition to identifying the historical crops grown, pesticides applied, and the methods of application. Constituents of concern associated with active and former agricultural operations, within the project site include organochloride pesticides and metals, which may pose a human health risk. Several soil samples found on the project site were above the applicable thresholds. Previous soil sampling on one of these properties in 2007–2008 showed toxaphene levels in soils, above the screening levels. On another property, elevated levels of chlordane and toxaphene were documented during soil testing. Thus, there is a possibility that on-site soils could contain significant levels of chemical residues and the Phase I ESAs provide recommended remediation measures, to reduce the identified impacts to less than significant levels, such as removal of the soils in question (in compliance with regulatory requirements) and replacement with clean soils.

1.4.2.4 Climate

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

Localized climate zones were adapted from the described plantclimates, and are termed Generalized Plantclimate Zones, or Sunset Zones. Sunset Zones differentiate local microclimates, freeze/frost potential, and air/water drainage, based on conditions, such as latitude, elevation, topography, and the influence of oceanic and/or continental air masses. Sunset Zones were not developed as a tool to determine the suitability for commercial

agricultural production; therefore, their use is not intended to determine suitability for specific crops. They are a measure of overall climate suitability for the typical agricultural commodities produced in San Diego County (County of San Diego 2007).

The project site is located, within Sunset Zone 23, which has a rating of "high" and is one of the most favorable for growing subtropical plants and most favorable for growing avocados (County of San Diego 2007~~10~~). Climate conditions for the project site are typical of a Mediterranean climate regime, with a wet winter rainy season followed by a hot, dry summer. Spring and fall months tend to be mild in temperature and variable in rainfall amounts. The average January low temperature for the area is approximately 40 degrees Fahrenheit (°F), and the average July high temperature is between 85°F and 90°F. Average annual rainfall is 15 inches (~~Griner and~~ Pryde 2004~~1976~~).

1.4.2.5 Water Resources

The project site is within the County Water Authority (CWA) and is served by the Valley Center Municipal Water District (VCMWD), which has existing water transmission, storage, and distribution facilities, in the vicinity of the project site. The VMCWD has delivered in excess of 250 acre-feet of water-per-year, to the 608 acre project site, principally for irrigation. Many of the properties also contain working wells (Figure 11) and use groundwater to supplement water from the VCMWD, in order to irrigate orchards and common area landscaping, during drier and hotter periods of the year. The groundwater aquifer type, under the project site, is Fractured Crystalline Rock, which can store groundwater, but is not considered to have as much capacity, as other aquifer types.

If constructed, the project could use recycled water from an on-site water reclamation facility to irrigate common and agricultural areas, at the discretion of VCMWD. The project would include the construction of recycled water production and distribution facilities ("purple pipes") for irrigation of common area landscaping, slopes, parks, school fields, and as the primary method for irrigation of the retained groves; thereby, reducing the need for imported water.

1.4.2.6 Williamson Act Contracts and Agricultural Preserves

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

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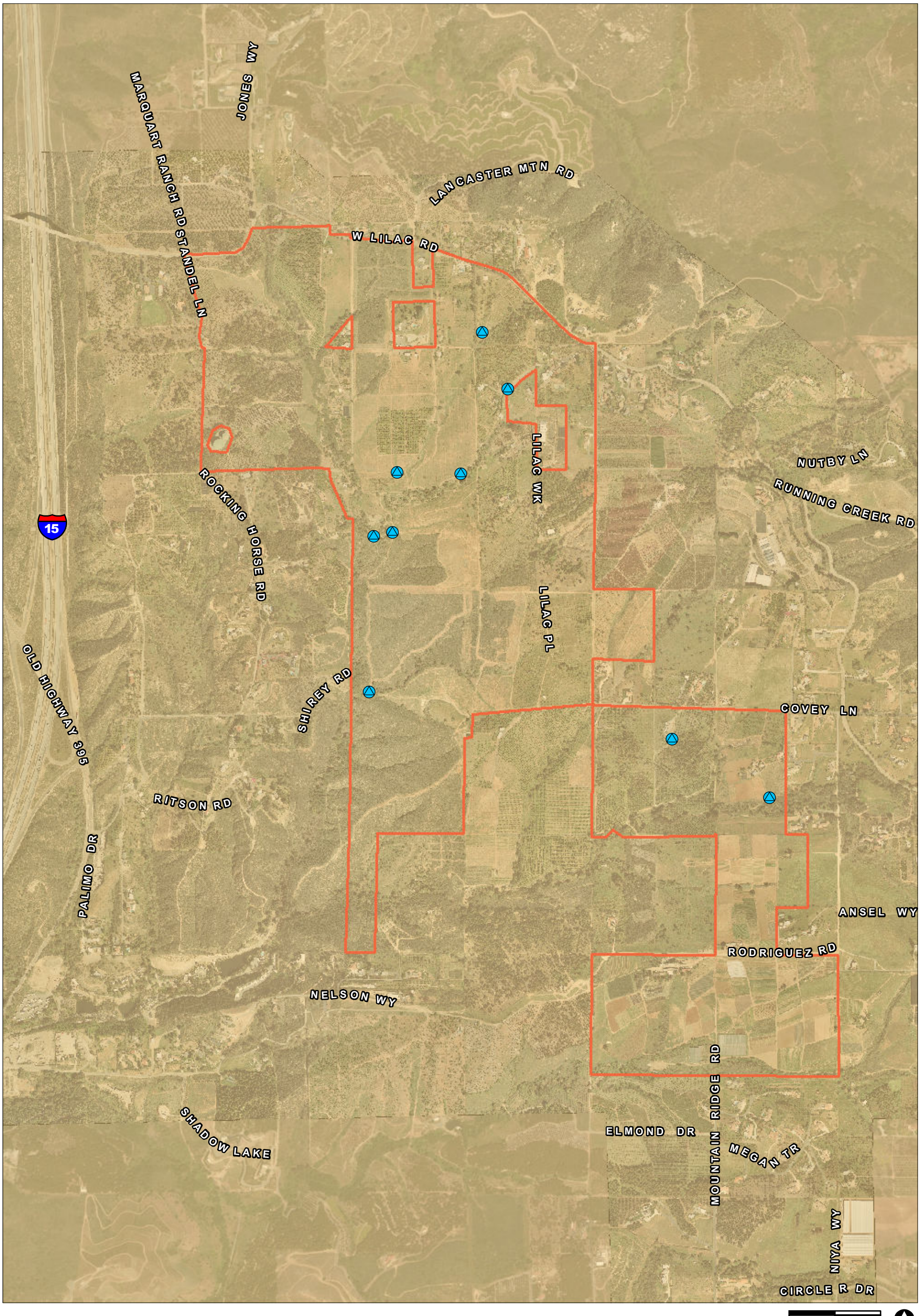

FIGURE 11

Water Resources

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Supervisors (U.S. Dept. of Conservation; 2005). Williamson Act contracts are currently being phased out due to the current state budgetary constraints.

There are no Williamson Act Contracts or Agricultural Preserves within the project site.

1.4.3 Off-site Agricultural Resources

1.4.3.1 Active Agricultural Operations

As described in the regional setting (subchapter 1.4.1), the off-site land uses within the project vicinity are similar to those within the project site. These land uses have historically been composed primarily of undeveloped open space, rural residential, and agricultural uses. The primary land uses found within the vicinity of the project site are agricultural related (i.e., orchards, vineyards, row crops, and nursery operations). See subchapter 1.4.2.3 for descriptions of these crop types, value, and acreage harvested within the County.

Additional detail regarding surrounding agricultural resources within one-mile of the project site is provided below and impacts are discussed within Chapter 3.0 of this report. The one-mile study area is measured from the project site boundary and is based on the County's "Report Format and Content Requirements" regarding the development of school sites, in agriculturally zoned areas. Specifically, the Report Requirements state that, "any project that proposes a school must evaluate potential impacts within one mile from the project site because existing regulations can restrict certain normal agricultural activities within one mile of a school". The extensive agricultural operations located within one-mile of the project site are shown on Figure 12 and are categorized as one of the following general types: "mixed use orchards," "nurseries and greenhouses," "row crops," and minor vineyard/minor orchard ("estate residential") uses as well as "undeveloped." These are described in more detail as follows:

a. Mixed-use Orchards

There are approximately 1,347 acres, within the one-mile zone around the project site, that fall into this category. This category consists of citrus and avocado orchards, with the citrus orchards being most prevalent, within the flatter portions of the site with well-developed soils and avocados being present, within the steeper areas. Orchards within the one-mile zone consist primarily of commercial scale operations located to the north and south of the project site. A few additional smaller operations are located to the east and west. Most of the smaller scale orchards (approximately 2–4 acres) were considered part of the "estate residential" category discussed below.

b. Row Crops

Row crops are those areas used to grow labor intensive crops such as tomatoes, beans, strawberries, cucumbers, potatoes, squash, cauliflower, and peppers. The majority of row

cropping operations that exist in the project area are those located within the project site. Within the one-mile zone, there are only three acres of row crops mapped. This category is also sometimes referred to as “truck crops” and should be distinguished from “Intensive Agriculture” (which generally includes operations such as chicken farms, dairies, and feed lots) and from “Field Crops,” which are crops that require few inputs, such as alfalfa, oats, wheat, and other similar crops.

c. Nursery and Greenhouse

Nurseries and greenhouses are usually small in scale, with respect to acreage. They typically contain structures used to cultivate high-value products, such as flowering/foliage plants and gourmet food products such as mushrooms. They may also be used to grow commodities, such as landscaping, decorative plants, fruit trees, herbs, and flowers. This category can sometimes be associated with adjacent outdoor areas that are used for cultivation in a manner similar to “row crops.” There are 306 acres of this type present~~,~~ within one mile.

d. Estate Residential

Estate residential is a category, in which agricultural operations are an incidental use to the primary land use of large lot residential. This category can be typically characterized by small orchards located, on two- to four-acre residential parcels. It should be noted that, although small in size, orchards that fall within this category can be an important agricultural resource because more than two-thirds of farms within San Diego County are between one and nine acres in size and four acres is the median farm size. Despite their small size, farms in San Diego County generated over $1.6 billion in 2010. There are 724 acres of this category within the one mile buffer area.

e. Undeveloped

The remaining 2,500 acres, within the one-mile zone around the site, is comprised primarily of undeveloped open space with native habitat, although it was noted during the site visit that there were a few areas which may once have been agriculture that has been allowed to revegetate with native habitat types.

1.4.3.2 Williamson Act Contract Lands/Agricultural Preserves

There are no Williamson Act Contract lands or Agricultural Preserves, within the project site. However, there is an Agricultural Preserve (Preserve #88) located adjacent to the southeast corner of the project site. In addition, there are parcels within a Williamson Act Contract to the northeast (Figure 13). The two closest Williamson Act parcels total 59.34 acres and are both within the same Williamson Act Contract (#72-56), and within Agricultural Preserve Number 24. These Williamson Act parcels are geographically separated from the project site by a major drainage (Keys Canyon) and there are no major access points connecting to

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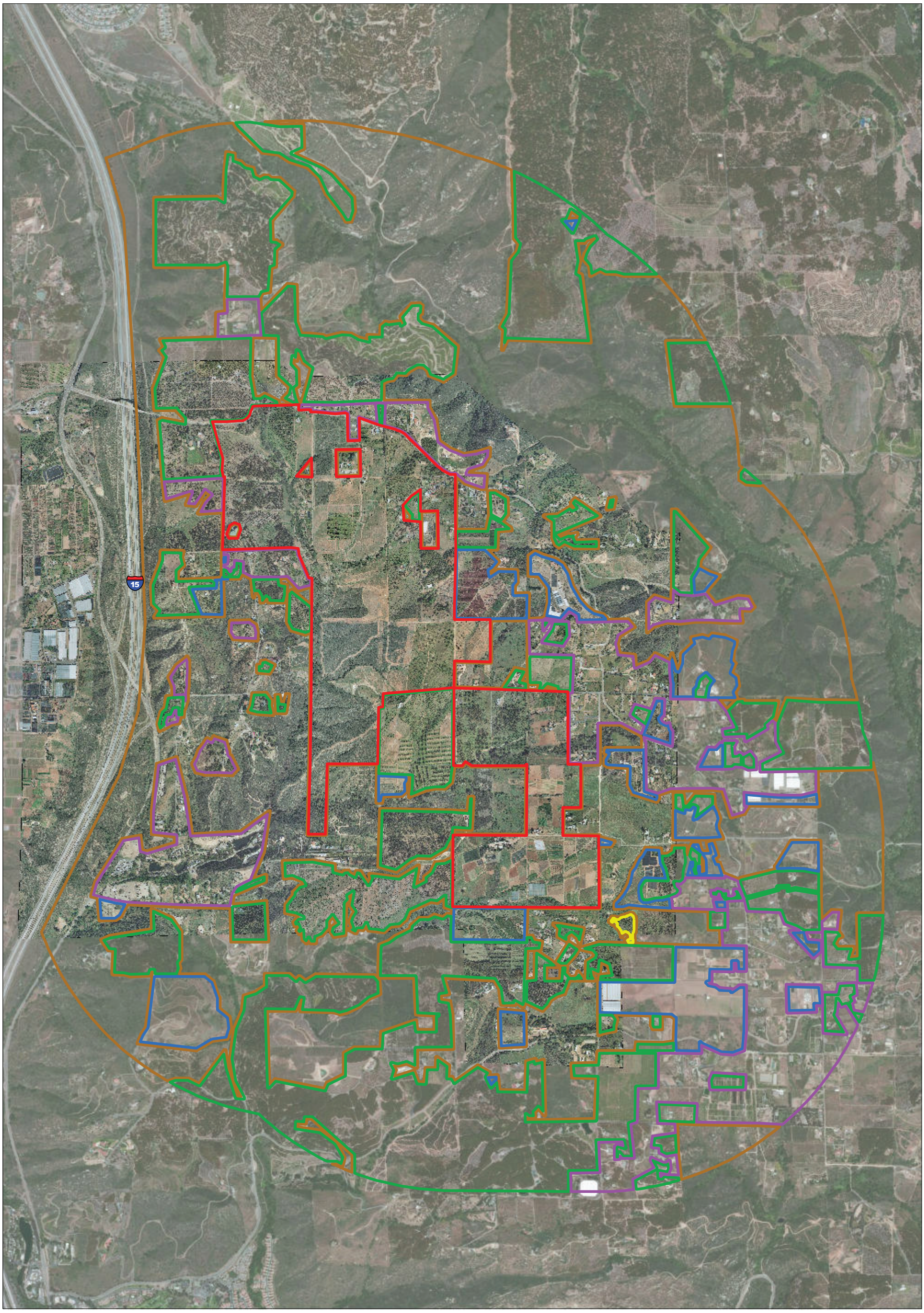

Project Boundary

Off-site Agricultural Resources

- Nursery and Greenhouse
- Row Crops
- Mixed-use Orchards
- Estate Residential
- Undeveloped

0 Feet 1,700

FIGURE 12

Off-site Agricultural Resources

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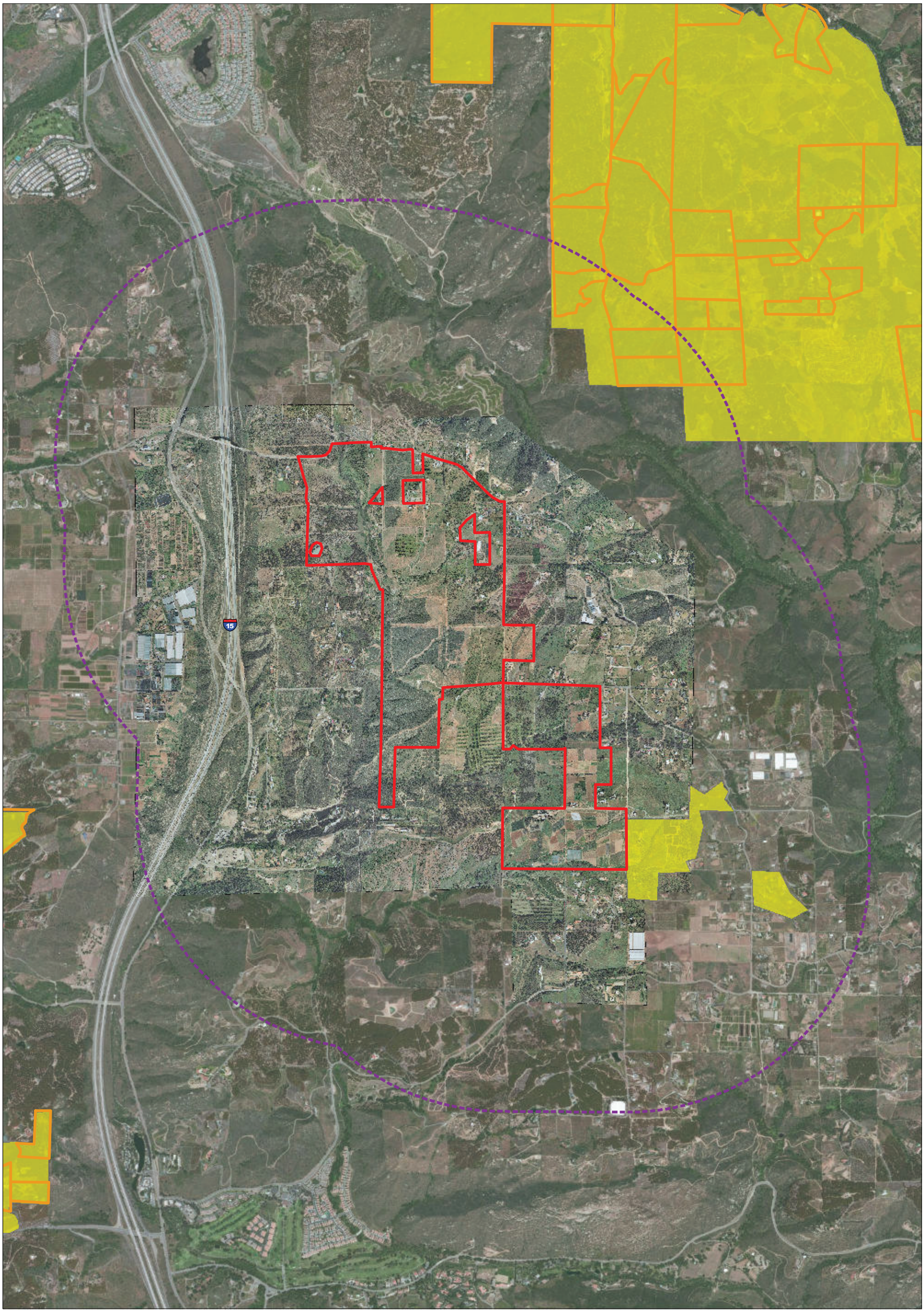

FIGURE 13

Williamson Act Contracts and Agricultural Preserves

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the proposed project. In total, there are 97.3 acres of Williamson Act Contract lands and 242 acres of Agricultural Preserves within one mile of the project site.

1.4.3.3 FMMP Important Farmland Designations

As shown below in Table 5~~3~~ and Figure 5, six FMMP Important Farmland categories occur within the one-mile buffer area around the project site including Farmland of Local Importance, Farmland of Statewide Importance, Prime Farmland, Unique Farmland, Urban and Built-up Land, and Other Land. These categories are defined above in subchapter 1.4.2.2 and the acreage of the Important Farmland found within the project site is detailed, in Table 4~~2~~.

TABLE 5~~3~~
ACRES OF FMMP FARMLAND WITHIN
ONE MILE OF THE PROJECT SITE

Category	Total Acres
Farmland of Local Importance	1,270
Farmland of Statewide Importance	140
Other Land	2,166
Prime Farmland	24
Unique Farmland	2,635
Urban and Built-up Land	25
TOTAL	6,260

1.4.4 Zoning and General Plan Designation

The project site's General Plan Land Use Element Regional Category is Semi-Rural. The General Plan Land Use Designations for the project site are Semi-Rural SR-10 and Semi-Rural SR-4c (1 unit per 4, 8, or 16 gross acres, depending on slope). The small portion of the site, which lies within the Bonsall Community Plan, is zoned Rural Residential (RR). The majority of the project site, which lies within the Valley Center Community Plan Area, is zoned "Limited Agriculture" (A70). The intent of the A-70 Use Regulations is to create and preserve areas intended primarily for agricultural crop production. Additionally, the A-70 zone allows property owners to raise a limited number of small farm animals, on the premises. Typically, the A70 Use Regulations would be applied to protect moderate-to high quality agricultural land.

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2.0 On-site Agricultural Resources

2.1 Local Agricultural Resource Assessment Model (LARA)

The County of San Diego has approved a local methodology that is used to determine the importance of agricultural resources, in the unincorporated area of San Diego County, known as the LARA Model. The LARA Model takes into account three Required Factors, including water, climate, soil quality and three Complementary Factors surrounding land uses, land use consistency, and slope, in determining the importance of agricultural resources.

The following subheadings include a description of the project site's rating for each LARA Model factor, including justification for the factor ratings assigned to the project site. Each factor receives a rating of high, moderate, or low importance, based on site-specific information as detailed, in the LARA Model Instructions (Section 3.1 LARA Model Instructions, from the Agriculture Guidelines for Determining Significance). The factor ratings for the project site are summarized in Table 6~~4~~, LARA Model Results. The final LARA Model result is based on the combination of factor ratings, in accordance with Table ~~7~~5, Interpretation of LARA Model Results.

TABLE 6~~4~~
LARA MODEL RESULTS

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

TABLE 7~~5~~
INTERPRETATION OF LARA MODEL RESULTS

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

2.1.1 LARA Model Required Factors

The following subchapters describe the site specific conditions that result in each LARA Model Required Factor rating, for the site.

2.1.1.1 Water

Many of the individual parcels that make up the project site contain working wells, but the groundwater aquifer type underlying the site is Fractured Crystalline Rock. As discussed in the Water Resources section above, this portion of the Valley Center community is within the boundaries of the CWA and is served by the VCMWD, which has existing water transmission, storage, and distribution facilities, in the vicinity of the project site. There are water connections and meters to portions of the project site and the VMCWD has delivered, in excess of 450 acre-feet of water per year, to irrigate the approximately 394 acres of existing agriculture. Thus, pursuant to LARA Model Table A-1 (see Attachment A~~1~~), the project receives a **High** rating.

2.1.1.2 Climate

The project site lies within Zone 23 of the Sunset Zone plant climates. Zone 23 represents the thermal belts of the Coastal Area climate which is favorable for growing subtropical plants and is the most favorable for growing avocados. Zone 23 covers the coastal incorporated cities as well as unincorporated communities and is assigned a **High** rating due to the favorable growing conditions of this zone.

2.1.1.3 Soil Quality

The soil quality rating given by the LARA Model is based on the presence of Prime Farmland Soils or Soils of Statewide Importance that are available for agricultural use and have been previously used for agriculture. To determine the area of the project site that is "available for agriculture," biological maps and aerial photos were examined (see Figure 8). Areas within the project site that are currently under active cultivation were included. Additionally, areas adjacent to existing agriculture that are flat and contain relatively high-quality soils, but that are currently vegetated with non-native grassland or other disturbed habitat, were included. Areas of the site that contain structures (e.g., residences, outbuildings, paved roads), have been compacted (e.g., unpaved roads), or that consist of undisturbed native vegetation or wetlands were not included.

A total of 400.38 acres of the 608-acre project site were identified as being available for agriculture. The soil quality rating is obtained by determining the proportion of the "available for agriculture" soils that are Prime Farmland soils or soils of Statewide Importance. As detailed in the LARA Model worksheets appended to this document as Attachment A~~1~~, the project received a 0.115~~100~~ rating out of a possible 1.0 maximum. Soil quality matrix scores that are less than 0.33 and have less than 10 acres of contiguous Prime Farmland or Statewide Importance soils receive a low rating pursuant to the LARA Model. The ~~refore, since the~~ project's 0.~~100~~094 soil rating is less than 0.33; thus the next step was to evaluate LARA Model Table A-4's qualifying statement "…or has a minimum of 10 acres of contiguous Prime or Statewide Importance Soils" (see Attachment A; Table 4). There is one soil type on-site that could potentially meet this criterion; the Fallbrook sandy loam, 5 to 9 percent slopes, eroded or "FaC2" soil type that comprises 32.59 acres of the site, 27.38 acres of which are "available for agriculture". There are two separate concentrations of the FaC2 soils that comprise the 27.38 acres (Figure 14); the eastern area is 12.74 acres and the western area is 14.64 acres. Both of these areas could be considered fragmented because of overlying factors such as the presence of riparian corridors, native habitat, a residence and outbuildings, hard packed dirt roads, imported fill, and other factors that modify the characteristics of the soil. However, much of the fragmentation occurs due to the presence of hard-packed dirt roads used to access the groves and the estate residences (Figure 15). Many of the roads are not covered by an easement and could potentially be converted back to agricultural use through standard agricultural practices. Therefore, a conservative approach of considering only the baseline soils data as mapped by the NRCS was taken in order to provide a worst-case analysis. Accordingly, because both of these areas contain 10 acres or more of contiguous soils of Prime or Statewide Importance, a **Moderate** rating was applied to the Soils Quality primary factor.

2.1.2 LARA Model Complementary Factors

Because all of the LARA Model Required Factors were moderate or higher, the Complementary Factors must also be analyzed. The following subchapters below describe the analysis that results in each of the three LARA Model Complementary Factor ratings.

Analysis of the Complementary Factors requires utilization of the Zone of Influence (ZOI). The County Guidelines (page 33) provide the methodology for calculating the ZOI. In summary, the process generally consists of drawing (using Geographic Information Systems [GIS]) a ¼ mile buffer around the entire project site and then including all parcels in the ZOI that are within or intersect with the ¼ mile buffer line (excluding the parcels the comprise the project site itself). For the proposed project, the ZOI was calculated to be 2,604 acres.

2.1.2.1 Surrounding Land Use

The more compatible a site is with the surrounding land uses, the more likely it is to avoid nuisance complaints and other issues from non-farm neighbors. This factor accounts for the degree to which the vicinity is agricultural and assigns a higher rating to a site which is within an agriculture-dominated area. The LARA model recognizes that agriculture can be viable amongst urban uses~~:~~, but that its long-term viability is generally less because of increased economic pressures to convert to urban uses. Within the proposed project's 2,604-acre ZOI, the areas determined to be Consistent with Agriculture totaled 1,650.5 acres or 63.4%. The site would therefore receive a **High** rating for the Surrounding Land Use Complementary Factor.

2.1.2.2 Land Use Consistency

The Land Use Consistency analysis consists of comparing the project's median parcel size with the median parcel size of all the parcels within the ZOI. The reason for this methodology is that the County recognizes that a site surrounded by larger parcels indicates the site is located in an area that has not already been significantly urbanized; whereas a site surrounded by smaller parcels would likely experience incompatibilities and the corresponding reduction in economic viability when considering foregone opportunity costs.

The median parcel size of the project site's 58 parcels was calculated to be 5.36 acres, while the median parcel size of all the parcels within the ZOI is 2.8 acres. Because the project site's median parcel size is greater than the ZOI median parcel size, but not by more than 10 acres; the project would receive a **Moderate** rating for Land Use Consistency.

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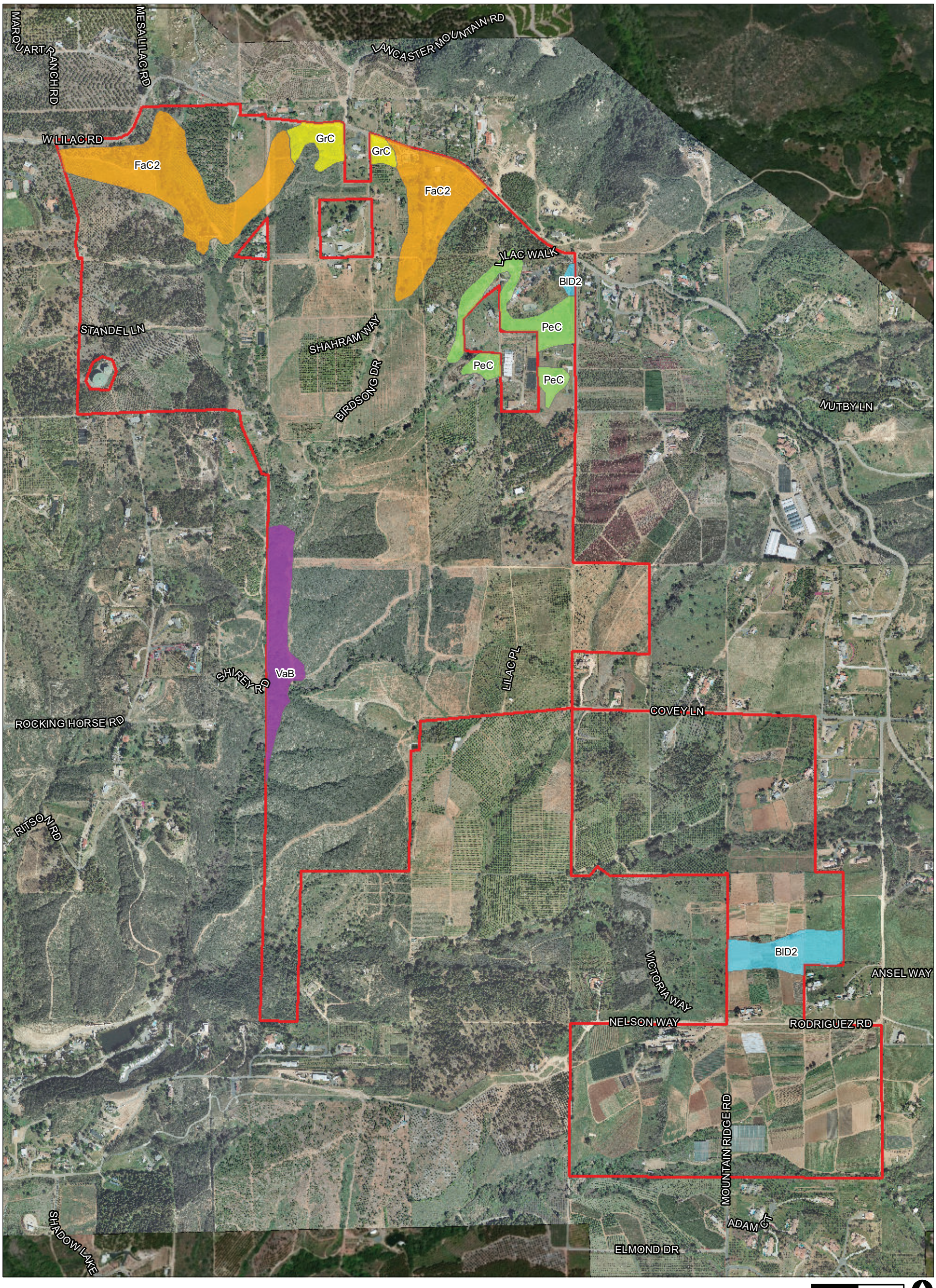

Project Boundary

Soil Classification

- BID2 - Bonsall sandy loam, 9 to 15 percent slopes, eroded
- FaC2 - Fallbrook sandy loam, 5 to 9 percent slopes, eroded
- GrC - Greenfield sandy loam, 5 to 9 percent slopes
- PeC - Placentia sandy loam, 2 to 9 percent slopes
- VaB - Visalia sandy loam, 2 to 5 percent slopes

FIGURE 14

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Prime and Statewide Importance Soils Exhibit

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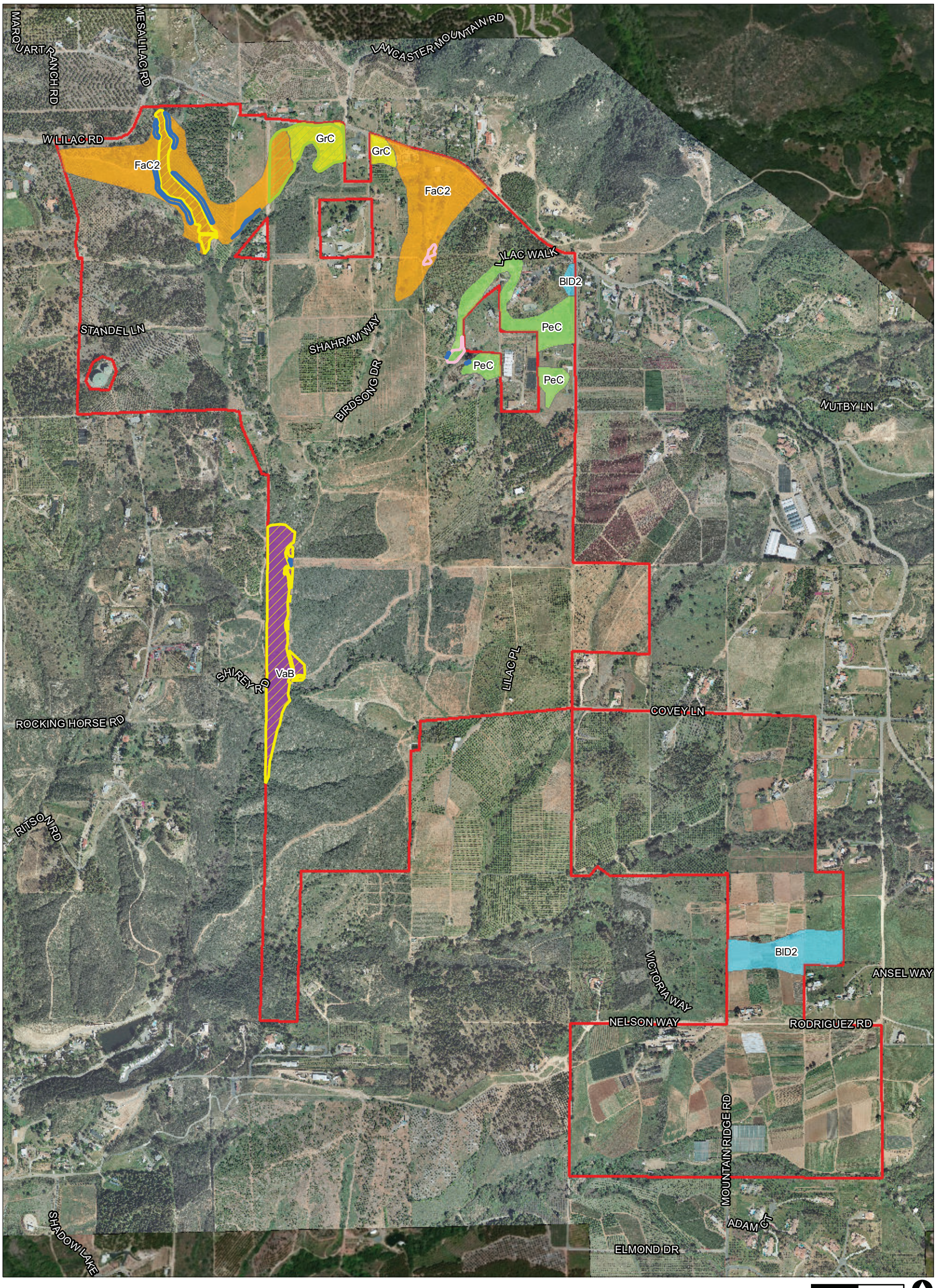

Project Boundary

Retained Under Biological Easement

Soil Availability for Agriculture

Habitat Constrained by Regulatory or Legal Exclusion

Habitat Never Used for Agriculture

Lands with Existing Structures

Soil Classification

BID2 - Bonsall sandy loam, 9 to 15 percent slopes, eroded

FaC2 - Fallbrook sandy loam, 5 to 9 percent slopes, eroded

GrC - Greenfield sandy loam, 5 to 9 percent slopes

PeC - Placentia sandy loam, 2 to 9 percent slopes

VaB - Visalia sandy loam, 2 to 5 percent slopes

FIGURE 15

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Prime and Statewide Soils Constraints

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2.1.2.3 Slope

Slope is a Complementary Factor in the LARA model to account for the role that topography plays in the viability of a parcel for agricultural production. While certain crops (e.g., avocados) can thrive on steeply sloped land, gentle topography allows for a wider range of potential uses and is easier for the operator to manage with regard to runoff and soil erosion. The average slope across the project site's 608 acres is 18.3%; the site would, therefore, receive a **Moderate** Slope rating.

2.1.32 LARA Model Result

Based on the results of the LARA Model, the site is ~~not~~ considered an important agricultural resource. The results of the model analysis, which are discussed above, are summarized in Table 64. Table 64 shows that the site received a ~~low~~ moderate rating for soil quality and a high rating for climate and water resources. These three criteria are Required Factors, pursuant to the LARA Model~~, and a rating of low for any one Required Factor automatically identifies the project site as not an important agricultural resource~~. Since ~~one of~~two of the three Required Factors ~~is~~ were rated ~~low~~high and one was rated moderate, ~~there is no need to analyze~~ the Complementary Factors ~~found in~~were also analyzed pursuant to the LARA Model requirements. The site received a high rating for the Surrounding Land Uses factor and a moderate rating for both Land Use Consistency and Slope factors. ~~Based on Table 4, T~~this result would place the project within Scenario 25, which means that the site is ~~not~~ an **important agricultural resource**.

2.1.43 LESA Model Result

During the initial public review period, comments were submitted regarding the Land Evaluation and Site Assessment (LESA) Model. While the LESA model is used nationwide and in several other counties in California, it is no longer used in San Diego County. In 2007, the LESA model was replaced by the LARA model, which was created as a more locally appropriate method of evaluating the unique types of agriculture that occur in San Diego County~~For comparative purposes, an analysis of the Lilac Hills Ranch project site also was conducted under the LESA model methodology which was utilized prior to the adoption of the LARA model.~~. The LESA model methodology relies heavily upon the Land Compatibility Classification (LCC) and Storie Index (SI) soil quality rating methods. The LARA model acknowledges the LCC and Storie Index methods of rating soils, but explains that these soil quality rating methods are not a component part of the LARA model analysis because these ratings do not adequately account for locally important soils.

In order to address the aforementioned comment, an analysis of the Lilac Hills Ranch project site was conducted under the LESA model methodology and is included in this report for informational and comparative purposes only. The results of the analysis are summarized below.

FINAL LESA SCORESHEET

Factor Name	Factor Rating	Factor Weighting	Weighted Factor Rating
Land Capability Classification	19.443	0.25	4.86
Storie Index Rating	23.111	0.25	5.78
Land Evaluation (LE) Subscore	----	----	**10.64**
Project Size	100	0.15	15.00
Water Resource Availability	58.3	0.15	8.75
Surrounding AG Lands	60	0.15	9.00
Protected Land Resources	0	0.05	0.00
Site Assessment (SA) Subscore	**----**	**----**	**32.75**
TOTAL LESA SCORE		**1**	**43.38**

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

As shown on the Final LESA Scoresheet, under the LESA methodology, the analysis results in a Total LESA Score of 43.38. As explained in the LESA Scoring Threshold table, a total LESA score between 40 and 59 points means the resources are significant only if the Land Evaluation ("LE") and Site Assessment ("SA") subscores are each greater than or equal to 20 points. ~~However, ~~As shown on the Final LESA Scoresheet, the project's LE and SA subscores are 10.64 and 32.75, respectively. Accordingly, the agricultural resources on the project site would not be considered "significant" under the LESA methodology because although the total score is between 40 and 59 points, the LE subscore (10.64) is less than the required 20 points. Therefore, the outcome of the analysis ~~would be the same ~~under the LESA methodology actually would conclude that the project would not result in significant direct impacts, in contrast to the results set out above~~as it is~~ utilizing the LARA method.

2.2 Guidelines for the Determination of Significance

The following significance guideline is the basis for determining the significance of impacts to important on-site agricultural resources, as defined by the LARA Model, in San Diego County. Direct impacts to agricultural resources would be potentially significant when the following occurs:

- 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; as a result, the project would substantially impair the ongoing viability of the site for agricultural use.

2.3 Analysis of Project Effects

2.3.1 On-site Agricultural Resources

The site has been historically farmed and has not been previously developed; with the exception of a few scattered rural residences. Most of the area proposed for development has been previously disturbed (445.09 acres; 73.2 percent) either by agricultural uses, roads, or rural residences and associated ornamental landscaping. The remaining 160.3 acres (26.4 percent) of the site, much of which is constrained by steep topography, is currently undisturbed and supports significant biological or cultural resources which would be preserved as open space. There are also several drainage features vegetated with riparian communities that would be left undisturbed.

As shown below in Table 8~~6~~, the project would develop the site with ~~for~~ up to 1,746 dwelling units, a commercial town center, retail uses, a school site, and an active park/village green. The remainder of the site would be open space (20.3 acres as agriculture/common areas and 104.1 acres as conservation/open space).

TABLE 8~~6~~
LAND USE SUMMARY

Land Use	Acreage	Dwelling Units
Single-family Detached	156.9	903
Single-family Senior	76.9	468
Single-family Attached	7.9	164
Group Residential/Group Care	6.5	N/A
Commercial and Mixed-Use	17.3	211
K-8 School Site	12.0	N/A
Institutional Use	10.0	N/A
Parks - Dedicated to County	13.5	N/A
Parks – Homeowners Association	10.1	N/A
Community Purpose Facility	2.0	N/A
Biological Open Space	104.1*	N/A
Common Areas/Agriculture	20.3*	N/A
Manufactured Slopes	68.2	N/A
Circulating and Non-Circulating Roads	83.3	N/A
Water Reclamation Facility	2.4	N/A
Recycling Facility/Trail Head/Staging Area	0.6	N/A
Detention Basins	7.9	N/A
Wet Weather Storage	8.1	N/A
TOTAL	608	1,746

As shown on Table 3~~1~~ and Figure 14, there are a total of 63.4 acres of on-site soils (10 percent of the project site) that meet the Prime and Statewide Importance soil candidate criteria. However, based on the definition found, on Page 28 of the Agricultural Resources Guidelines, approximately ~~23.2~~17.1 ~~-~~acres are "unavailable for agricultural use" as they lie within areas previously developed with roads, residences, or native habitat that has not been previously disturbed by agriculture. The remaining ~~40.2~~46.3 acres meet the criteria to be both classified as a soil of Prime or Statewide Importance and "available for agriculture".

~~While t~~The project includes "Common Areas/Agriculture" and "Manufactured Slopes" (see Table 8~~6~~ above), which would be planted with citrus and avocado trees; these would be Homeowners Association (HOA) maintained and conservation easements are not proposed. Further, of the 23.8 acres of agriculture that lie within the biological (riparian) buffers, just 2.53 acres contain soils of Prime or Statewide Importance. ~~mass grading would be required to create the building pads and manufactured slopes.~~ Therefore, it can be assumed that, with the exception of the 2.53 acres (preserved permanently within a biological conservation easement), all of the soils that meet the Prime and Statewide Importance soil candidate criteria would be converted. The preservation of the 2.53 acres within the agricultural buffers/open space means that total conversion of Prime and Statewide Importance Soils would be 43.8 acres.

Pursuant to the LARA Model analysis performed for the project (see Attachment A~~1~~), the site ~~was rated as "Low" for one of the three "Required Factors" analyzed~~was determined to be a significant agricultural resource. Based on the County Agricultural Resource

Guidelines, Section 4.1.1 (Page 36), direct impacts would occur because ~~if~~ the project site ~~is~~ meets all three criteria: (1) it was determined to be an important agricultural resource~~,~~ after a run of the LARA Model; (2) the project would result in the conversion of 43.8 acres of soils that are available for agricultural use and would meet the soil quality criteria for Prime Farmland or Statewide Importance; and (3) the project would substantially impair the ongoing viability of the site for agricultural use. ~~Therefore, as with the subject project site, if that determination is not made for a property, it would be less than significant.~~ As a result, the project would result in a significant direct impact to agricultural resources.

2.3.2 Off-site Improvement Impacts

As discussed in subchapter 1.2.2 above, the areas below indicate where off-site roadway improvements would be required to accommodate project traffic. These areas are shown on Figure 5 and evaluated for impacts to agricultural resources as follows:

1. **West Lilac Road**: The widening to 2.2F Light Collector west toward the Walter F. Maxwell Memorial Bridge would impact 1 acre of Other Land and 2.37 acres of Unique Farmland.

2. **Lilac Hills Ranch Road**: This private easement connection would affect 1 acre of land which is mapped as Farmland of Local Importance but which is a dirt road between two estate residential parcels that is not currently farmed**.**

3. **Covey Lane:** This improvement would take place within the confines of an existing public roadway. However, widening this road from 28 feet to 40 feet would impact approximately 0.8 acre of Other Land and 0.35 acres of Unique Farmland (currently utilized for orchard crops).

4. **Street B:** This 310 feet of improvements along a 50-foot-wide private easement would impact 0.35 acres of Unique farmland and 0.04 acres of Farmland of Local Importance.

5. **Mountain Ridge Road:** This private easement connection would require 3,800 feet of improvements from the southern project boundary south to a connection with Circle R Drive. The 40-foot right-of-way (ROW) required for this off-site improvement would impact 0.6 acre of Farmland of Local Importance, 0.5 acre of Other Land, and 0.9 acre of Unique Farmland.

6. **Rodriguez Road:** This 40-foot-wide graded road easement would be paved to a width of 24 feet from Lilac Ranch Road to Covey Lane.

7. **Miller ~~Fire~~ Station ~~#15~~:** The off-site improvement options for the Miller Station could entail the remodeling of the existing station to increase its current size to roughly 5,500 square feet, or the construction of a new station, approximately 1,500

square feet in size. The site is disturbed by the existing fire station, driveway, and landscaping. The site is mapped by the FMMP as "Other Land."

The direct impacts to off-site agricultural resources and operations resulting from off-site roadway improvements described above would be less than significant based on the following considerations: (1) the small impact acreages; (2) the locations generally occurring along ROW of existing roadways (even if private); and (3) the fact that no Prime Farmland or Farmland of Statewide Importance would be affected. Some small acreages mapped as Unique Farmland (totaling 3.9 acres) would be affected along four of the five off-site improvements; however, these areas are within ROW of existing roadways and are not part of any active agricultural operations.

2.4 Mitigation Measures and Design Considerations

Mitigation Measure 1

~~Because no significant impacts were identified, mitigation is not required.~~ Pursuant to the County Guidelines (page 45) for direct impacts, a 1:1 mitigation ratio would be required for impacts to the 46.3 acres of soils that meet the criteria for Prime Farmland or Farmland of Statewide Importance and which are "available for agriculture". As part of the project design 23.8 acres of agriculture would be permanently preserved within biological open space corridors (with a biological conservation easement). However, only 2.53 acres of the 23.8 acres implemented as part of the project design overlaps with the 46.3 acres of Prime or Statewide Importance soils on-site. Therefore, the total acreage requiring mitigation is 43.8 and the applicant shall be required to implement one of the following options:

A. The applicant shall purchase mitigation credits through the County's 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, the applicant shall mitigate for the 43.8 acres of Prime and Statewide Importance soils impacted~~,~~ at a 1:1 ratio~~,~~ through the purchase of 43.8 mitigation credits. The credits shall be purchased prior to the issuance of a grading permit.

B. In the event that PACE credits are unavailable or the applicant elects not to participate~~;~~, the applicant may choose to independently secure conservation easements. The conservation easement shall prohibit non-agricultural uses and must include Prime and Statewide Importance soils equal or greater to the soils being converted and at a 1:1 ratio (43.8 acres). The conservation easements shall occur within the County of San Diego and within 100 miles of the project site. The

applicant shall grant the easement in perpetuity to the County prior to the issuance of a grading permit.

C. To the extent feasible, the applicant may choose to mitigate for 43.8 acres of impacts to Prime and Statewide Importance soils by preserving soils of equal value (Prime or Statewide Importance) within the project site.

~~A.~~D. The applicant may choose to mitigate for 43.8 acres of Prime and Statewide Importance soils through a combination of options 1, 2, or 3 so long as the total acreage of mitigation is equal to a 1:1 ratio (43.8 acres) and occurs on soils of equal value to those being converted. The applicant shall provide proof to the County that the mitigation has been implemented prior to the issuance of a grading permit.

2.5 Conclusions

As described above, and detailed within Attachment A~~1~~, the site received **high** scores for climate and water~~;~~ ~~but received a **low** score (0.100 out of a possible 1.0)~~and a **moderate** score for soil quality. These three criteria are Required Factors, pursuant to the LARA Model. Since two of the three Required Factors were rated high and one was rated moderate, the Complementary Factors were also analyzed pursuant to the LARA Model requirements. The site received a high rating for the Surrounding Land Uses factor and a moderate rating for both Land Use Consistency and Slope factors. The site, therefore, is ~~not~~ an important agricultural resource pursuant to Scenario 2 within Table A-6 of the County's LARA model. ~~Off-site improvements associated with the project were evaluated within Section 2.3.2 above and were similarly found to have less than significant impacts to important farmland.~~ Accordingly, direct impacts to agricultural resources would be ~~less than~~ significant, and ~~no~~ mitigation would be required.

Project impacts to significant agricultural resources may be mitigated through a combination of on-site agricultural preservation, off-site agricultural preservation, or participation in the County's PACE program. It is noted that the PACE program only accepts land into its mitigation bank that has been shown to be an important agricultural resource (with Prime Farmland or Statewide Importance soils) per the LARA model. Thus, the use of PACE mitigation bank credits would result in the preservation of important agricultural land and would mitigate project impacts to below a level of significance. In order to verify the feasibility of off-site conservation easements outside of the PACE program, Prime and Statewide Importance soils were tallied for the Bonsall Community Plan and Valley Center Community Plan areas (the project site lies within both plan areas). There is a combined total of 14,324 acres of Prime and Statewide ~~i~~Importance soils within the two Community Plan areas, so the purchase of 43.8 acres of conservation easements is a feasible mitigation measure. Off-site improvements associated with the project were evaluated

within subchapter 2.3.2 above and were found to have less than significant impacts to important farmland.

3.0 Off-site Agricultural Resources

3.1 Guidelines for the Determination of Significance

The County Guidelines for Determining Significance for Agricultural Resources (Section 4.2.2, Page 41) identifies the following significance guidelines for determining the significance of indirect impacts to off-site agricultural operations and Williamson Act Contract lands:

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

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

3.1.c 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 Contract.

3.2 Analysis of Project Effects

The County Guidelines for Determining Significance – Agricultural Resources states that the extent to which a project proposes a use that is similar to those already present in the surrounding area is an important factor in considering the significance of the placement of a non-agricultural use in proximity to an agricultural operation. A project proposed contiguous to an agricultural operation or Contract land would require greater scrutiny than a project separated from the agricultural operation or Contract land by other land uses. Where incompatible land uses are located near existing agricultural operations, adverse indirect impacts may include (but are not limited to) liability concerns, trespass, vandalism, theft, pesticide or farm practice complaints, pollutants, erosion, importation of pests, pathogens, and weeds, and increased traffic. Conflicts at the agriculture-urban interface flow in two directions: from existing agricultural use to a newly established non-agricultural use and vice versa (County of San Diego~~,~~ 2007).

Further, the Guidelines state that while the focus of this document is on impacts to agricultural resources rather than the impacts to the proposed new residents caused by farming; the adverse impacts perceived by the new residents contribute to the degradation of viability of surrounding farms. This is caused when nuisances or safety concerns perceived by urban neighbors trigger complaints about farming practices; subsequently farmers may feel pressure to discontinue their operations or reduce investment/productivity in their operation. Nuisance complaints may also cause farmers to modify or restrict their farming practices, causing economic hardships.

The County Guidelines state that compatibility buffers are the primary tool for increasing compatibility between existing agricultural uses/resources and proposed new non-agricultural uses. Further, the County recognizes that no buffer width is scientifically proven to address the entire potential range of compatibility impacts; but are nevertheless, the most important tool to minimize interface conflicts. The design and width of the agricultural buffers should be based upon site specific conditions of topography, weather patterns, and the commodity uses in the area and should be related to the anticipated interface conflicts.

As discussed in greater detail throughout, agricultural buffers are included as a mitigation measure along specific locations on the project site. These agricultural buffers would be maintained by the HOA and would preserve the agricultural character of the project area, as well as provide for transitioning between existing off-site agricultural operations and the project's land uses within those AA areas where significant impacts would occur. The AA areas are shown in Figure ~~14~~16.

3.2.1 Indirect Impacts - Williamson Act Lands

As described in subchapter 1.4.3.2 of this report, there are no Williamson Act Contracts or Agricultural Preserves~~,~~ within the project site. The two parcels under Williamson Act contract nearest the project site are approximately 0.6 mile from the project boundary and are on the opposite side of Keys Canyon (see Figure 13). Because of the distance of the Contract lands from the proposed project, lack of direct access between the project and the Contract lands, and geographic isolation due to the rugged terrain of Keys Canyon; indirect (compatibility) impacts related to nuisance factors such as noise, dust, theft, and odors would be less than significant. It is also unlikely that the project's added population or activities will alter these Contract lands for the same reasons. Indirect impacts to adjacent off-site agricultural resources are discussed in more detail in subchapter 3.2.3 ~~below~~.

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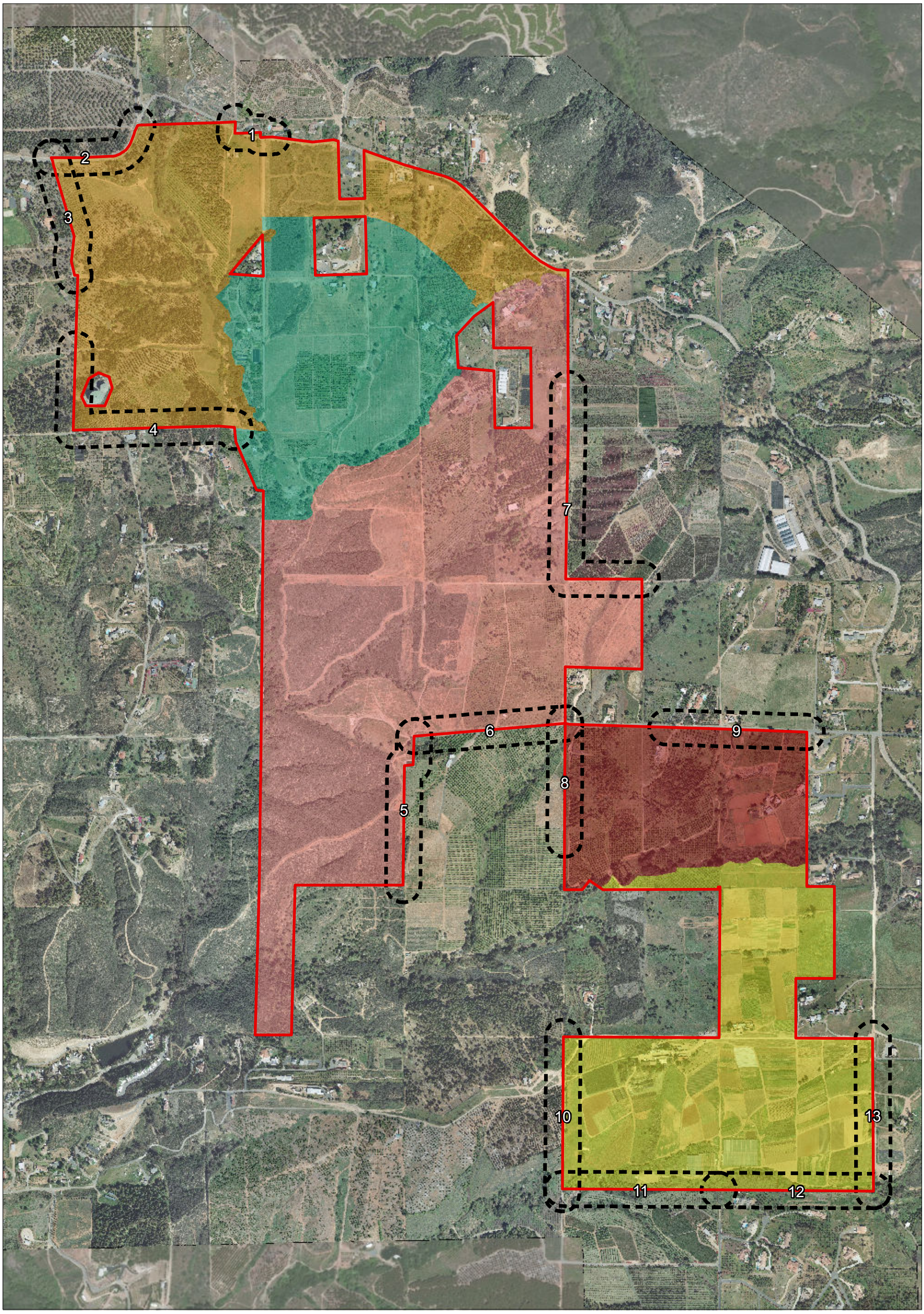

FIGURE 16

Off-site Compatibility/Agricultural Adjacency Areas

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Agricultural Preserve #88 is located directly adjacent to the southeast project boundary. Pursuant to the General Plan Update (GPU), non-contracted lands, within the adopted Agricultural Preserves are to be removed from the "A" Designator. While this removal has not yet been adopted, the GPU EIR, GPU goals, policies and mitigation measures, as well as other County policies and regulations, are in place to ensure the intended protections are achieved. Ultimately, to remove the "A" Designator, a County-initiated Zoning Ordinance amendment is required. However, because the project would not impact the Williamson Act contracted lands to the north, and the Agricultural Preserve Number 88, adjacent to the project site is not within a Williamson Act Contract, no significant indirect impacts are anticipated to occur.

3.2.2 Indirect Impacts - Land Use Conflicts

Urban/agricultural indirect effects or compatibility issues that arise when development is placed adjacent to existing agriculture include pesticide applications, dust generation, and noise that originate from the farming activities, causing complaints by the surrounding new residential uses. These types of complaints can create pressures resulting in the conversion of adjacent agricultural lands to non-agricultural uses. Many of these farming concerns are addressed through the implementation of the County Agricultural Enterprises and Consumer Information Ordinance disclosure statements and mitigation measures, as described above.

Other indirect impacts of farmland conversions could result from "edge effects," defined as changes that can occur where two different land use types meet. For purposes of this report, the two different land use types are urban (residential and institutional for the proposed project) and agriculture. For example, residents from the project may complain about noises, odors, and dust; and the farmers may complain about trespass, vandalism, water runoff, and damage to property. In addition, complaints about pesticide applications have been discussed in preceding sections. The pressure from adjoining neighbors' complaints related to legal farming activities may heighten the attractiveness of selling the farm for development. If this were to occur, eventually another indirect conversion could result from a leapfrog or non-contiguous development pattern.

Schools, religious institutions, hospitals, and daycare facilities (among others) create concentrations of people and are considered to be especially vulnerable public receptors when it comes to exposure to air contaminants, hazardous materials, and pesticides. Pesticide use is particularly relevant within the context of this agricultural technical report. The relevance lies in the potential for people with safety concerns to complain about pesticide use on farmland within one mile of the proposed sensitive use; and for ~~these~~ complaints to ~~can~~ create land use conflicts that hasten the conversion of farmland to non-agricultural use. Pesticide use as one of many agricultural practices (others discussed below) that can cause indirect-compatibility impacts with respect to the urban-agricultural interface is discussed in subchapter 3.2.3 ~~below~~. The focus of the following paragraphs is

on the potential for indirect impacts associated with pesticide use and the proposed on-site school park and religious institution.

The California Department of Pesticide Regulation regulates pesticide sales and use and fosters reduced risk pest management with the goal of protecting human health. Locally, pesticide permits for field fumigation are issued by AWM. As discussed in subchapter 1.4.3 ~~above~~, a one-mile study area (measured from the project site boundary) pursuant to the County's ~~"~~Report Format and Content Requirements~~"~~ was utilized when evaluating off-site land uses instead of one-quarter mile because of the proposed school site.

With respect to the proposed park and school within Phase 3, pesticide (especially aerial) applications are one of the most common indirect-compatibility impacts. Further, the pesticide application itself, if allowed to "drift," could cause health concerns to the proposed new use, while complaints about perceived health concerns could cause indirect impacts to the farmer that arise from the need to modify farming practices. Regarding aerial application of pesticides, State Regulations prohibit all pesticide applications from "drifting" off of the target property. Allowing a pesticide to substantially drift off the target site is a serious violation that can result in the imposition of a penalty in the range of $700 to $5,000. Permit conditions for aerial pesticide applications usually include an on-site buffer when adjacent to "sensitive sites" such as organic farming, schools, day care facilities, and residential uses. Several areas of the subject property have been organically farmed. Therefore, adjacent properties have already been limited to their aerial application of pesticides.

Furthermore, relative to the siting of schools, the California Education Code (CEC) establishes the law for California public education. CEC requires that the Department of Toxic Substances Control (DTSC) be involved in the environmental review process for the proposed acquisition and/or construction of school properties that will use State funding. The DTSC School Property Evaluation and Cleanup Division is responsible for assessing, investigating, and cleaning up proposed school sites and maintains a list of environmental assessments and the findings. The CEC requires a Phase I ESA be completed prior to acquiring a school site or engaging in a construction project. Depending on the outcome of the Phase ~~1~~I ESA, a Preliminary Environmental Assessment and remediation may be required. Notwithstanding all of the aforementioned processes, the applicant would simply be offering the school site; the school district is not required to accept the land and would have full discretion as to whether a school is ultimately constructed on the site.

As shown on Figure 3, a 12-acre school site is proposed within the south-central portion of Phase 3. Subchapter 1.4.3 ~~"~~Off-site Agricultural Uses~~"~~ states that within the one-mile zone around the project site, there are 1,347 acres of orchards, 3 acres of row crops, 306 acres of greenhouse/nursery uses, 616 acres of estate residential uses, and 2,500 acres of undeveloped land. There are no areas of row crops or nursery/greenhouses, within the vicinity of the proposed school; but there are existing orchards (subject to aerial spraying), to the south of the school site. The school site is approximately 325 feet from the project boundary and is separated from the off-site orchards by a proposed park (P-10). As both the

park and school are sensitive receptors and will result in concentrations of people, they are each ~~would each be~~ addressed with respect to indirect-land use compatibility impacts.

3.2.2.1 School

The future school site would include fencing and security gates to prevent unauthorized ingress or egress and eliminate ~~ing associated~~ trespass/vandalism conflicts. Therefore, due to the distance (325 feet) from the nearest off-site agriculture, the only anticipated compatibility impacts with respect to the proposed school would be pesticide use (specifically aerial spraying). As shown in Figure 10, the orchards directly south of the school site utilize aerial (helicopter) chemical applications as a means of pest control. Figure 10 also shows that aerial spraying on the property nearest to the school occurred between five and ten times, within the last five years; which equates to just once or twice per year on average.

~~These~~ Health concerns associated with this spraying can cause complaints, which (as detailed in subchapter 3.2 above) may cause indirect (compatibility) impacts **from** the proposed school ~~new on-site~~ uses **to** the off-site agricultural resource. As discussed in subchapter 1.4.2.3(b), CCR Title 3, Division 6 regulates the application of pesticides and prohibits discharging pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. The regulations also require prevention or minimization of "drift" during aerial applications and mandate the aerial application buffers to be measured from the property line into the agricultural property. ~~Drift is a primary concern for neighboring property owners and the public, due to the possibility that pesticide drift may contribute to health concerns.~~

Because the project design locates the school site 325 feet away from the project boundary, the presence of the intervening park (P-10), and state regulations preventing aerial pesticide "drift" onto neighboring properties; indirect impacts associated with the proposed school would be less than significant.

3.2.2.2 Park

The park itself would also create concentrations of people and be a sensitive receptor. Further, the park, unlike the school, would be ~~is~~ directly adjacent to the off-site orchards. The proposed park is located within Phase 3 of the project. Subchapter 3.2.3.4 ~~below~~ analyzes Phase 3 in greater detail and breaks down the areas where potential compatibility impacts could occur as AA 5 through AA 7. The park is discussed in association with AA 6, below.

3.2.2.3 Institutional

Pursuant to County guidelines, where a project proposes a church or other use that involves a concentration of people at certain times within one mile of an agricultural operation, land use conflicts would likely occur. The proposed Institutional land use is located within Phase 5 of the project, in the southernmost portion of the site. Subchapter 3.2.3.5 ~~below~~ analyzes Phase 5 in greater detail and breaks down the areas where potential compatibility impacts could occur as AA 10 through AA 13. The Institutional use is discussed in association with AA 13, below.

3.2.2.4 Age-Restricted

The Single-family Senior (SFS) housing proposed within Phases 4 and 5, while low-density housing similar to the housing found within Phases 1 through 3, is senior housing and considered a sensitive receptor for purposes of agricultural compatibility. Subchapter 3.2.3.4 ~~below,~~ analyzes Phase 4 in greater detail and breaks down the areas where potential compatibility impacts could occur as AA 9 and AA 13. The Age-Restricted use is discussed in association with AA 8, below.

3.2.2.5 Group Residential

Group residential (GR) would include group care land uses with units for independent living, assisted living, and ~~dementia~~ memory-impaired care. This land use would involve high concentrations of people. With approximately 200 units, within a 6.5-acre site, this land use type would be considered a sensitive receptor. The proposed project locates a 6.5-acre site designated GR along the eastern boundary of Phase 4. The site borders off-site estate residential land uses to the east. The remaining three sides are internal to the project site: biological open space lies to the south and SFS (age-restricted, single-family detached) to the north and west. The nearest active agricultural operation to the GR would be approximately 2,400 feet to the southeast or 2,900 feet to the east. As shown on Figure 10, neither of these agricultural operations is subject to aerial spraying. Because of the distance between these land uses and the fact that no aerial spraying has historically occurred; no significant impacts are anticipated.

3.2.3 Indirect Impacts - Changes to the Existing Environment

~~Residential, age restricted, institutional, and recreational land uses are proposed adjacent to farmland, along portions of the project boundary. As discussed in the preceding section with regard to the proposed park and school within Phase 3, pesticide (especially aerial) applications are one of the most common indirect compatibility impacts. Further, the pesticide application itself, if allowed to "drift", could cause health concerns to the proposed new use; while complaints about perceived health concerns could cause indirect impacts to~~

~~the farmer that arise from the need to modify farming practices. Regarding aerial application of pesticides, State Regulations prohibit all pesticide applications from "drifting" off of the target property. Allowing a pesticide to substantially drift off the target site is a serious violation that can result in the imposition of a penalty in the range of $700 to $5,000. Permit conditions for aerial pesticide applications usually include an on-site buffer when adjacent to "sensitive sites" such as organic farming, schools, day care facilities and residential uses. Several areas of the subject property have been organically farmed. Therefore, adjacent properties have already been limited to their aerial application of pesticides.~~

~~Urban/agricultural indirect affects or compatibility issues that arise when development is placed adjacent to existing agriculture include pesticide applications, dust generation, and noise that originate from the farming activities, causing complaints by the surrounding new residential uses. These types of complaints can create pressures resulting in the conversion of adjacent agricultural lands to non-agricultural uses. Many of these farming concerns are addressed through the implementation of the County Agricultural Enterprises and Consumer Information Ordinance disclosure statements and mitigation measures, as described above.~~

~~Other indirect impacts of farmland conversions could result from "edge effects"; defined as changes that can occur where two different land use types meet. For purposes of this report, the two different land use types are urban (residential and institutional for the proposed project) and agriculture. For example, residents from the project may complain about noises, odors and dust; and the farmers may complain about trespass, vandalism, water runoff, and damage to property. In addition, complaints about pesticide applications have been discussed in preceding sections. The pressure from adjoining neighbors' complaints related to legal farming activities may 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.~~

The project site is large and has an asymmetrical boundary; in addition, development would be phased over a long period of time with agriculture anticipated to continue on the portions of the site intended for later phases.

For ease in referencing specific locations over the large project site, Figure 16 shows the proposed phasing plan overlaying an aerial photograph. In addition, as discussed below, several locations around the perimeter of the project would subject the adjacent off-site agricultural operations to indirect (compatibility) impacts. Figure 16 also identifies 13 areas, referred to as "agricultural adjacency areas" or "AAs," around the project perimeter where the proposed development would abut existing off-site agricultural operations. AA 1 through AA 13 were identified through a combination of site visits, reviewing aerial photographs, biological resources mapping, the proposed phasing and open space buffers and ~~FMZ~~ Limited Building Zone (LBZ) exhibits, as well as a review of the San Diego Geographic Information Source ~~(SanGIS)~~ data layer for "Ground and Aerial Applications in the past 5 years," which is shown on Figure 10 of this report. As previously mentioned, one of the most

common complaints fielded by AWM is chemical/pesticide applications and the possibility that improper application or pesticide drift has occurred, due to aerial applications.

The following analysis of indirect impacts, resulting from the project, is discussed by each proposed phase. Since there are areas where there would be significant indirect impacts associated with existing off-site agriculture, any Project Design Considerations (PDCs) or required Mitigation Measures are also presented by Phase. Figure 16a and subsequent Figures 16b through 16i illustrate the locations of proposed agricultural buffers and other mitigation measures including the requirement for fencing. The proposed mitigation measures work together to preserve the agricultural character of the project area and protect on-site land uses from adjacent agricultural activities, as well as provide for visual transitioning between existing agricultural operations and the project's proposed land uses. The mitigation measures would also serve to protect the off-site agriculture operations from the previously mentioned "edge effects" that can arise when residents from the project complain about noises, odors and dust. The mitigation measures associated with off-site agricultural adjacency impacts are identified as follows:

- Mitigation Measure 2~~1~~ - Implementation of 50-foot-wide buffer zone, planted with two rows of trees (except AA 9, see below);
- Mitigation Measure 3~~2~~ - Maintenance of a 6-foot fence. ~~;~~The fence shall be restricted to one of two types (refer to Exhibit 137 of the Specific Plan): (1) the solid masonry type with a foundation that extends below ground level and with no gaps; or (2) the type that is a combination of masonry and metal fencing.
- Mitigation Measure 4~~3~~ - Restriction of placement of any structures within the existing ~~FMZ~~LBZ.

3.2.3.1 Phase 1

Phase 1 is the northernmost portion of the project site encompassing 121.5 acres adjacent to West Lilac Road. This area would include a maximum of 352 residential units, as well as biological open space, wetland buffers, and Fuel Modification Zone (FMZ). The project design for Phase 1 incorporates biological open space and FMZ along the northwestern boundaries. The southeastern portion of Phase 1 is within the proposed biological open space, which likewise contains biological open space and FMZ. Four AA areas were identified within Phase 1; these are discussed in greater detail as follows:

Map Source: Landmark Consulting, 2013

FIGURE 16a
Agricultural Adjacency Area 3

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Map Source: Landmark Consulting, 2013

LEGEND

- PROJECT BOUNDARY
- EXISTING EASEMENT
- EXISTING FENCE
- PROPOSED FENCE
- TOTAL AGRICULTURAL BUFFER
- LIMITED BUILDING ZONE
- PROPOSED FIRE-RESISTIVE TREE (TYP.)

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FIGURE 16b
Agricultural Adjacency Area 4

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Map Source: Landmark Consulting, 2013

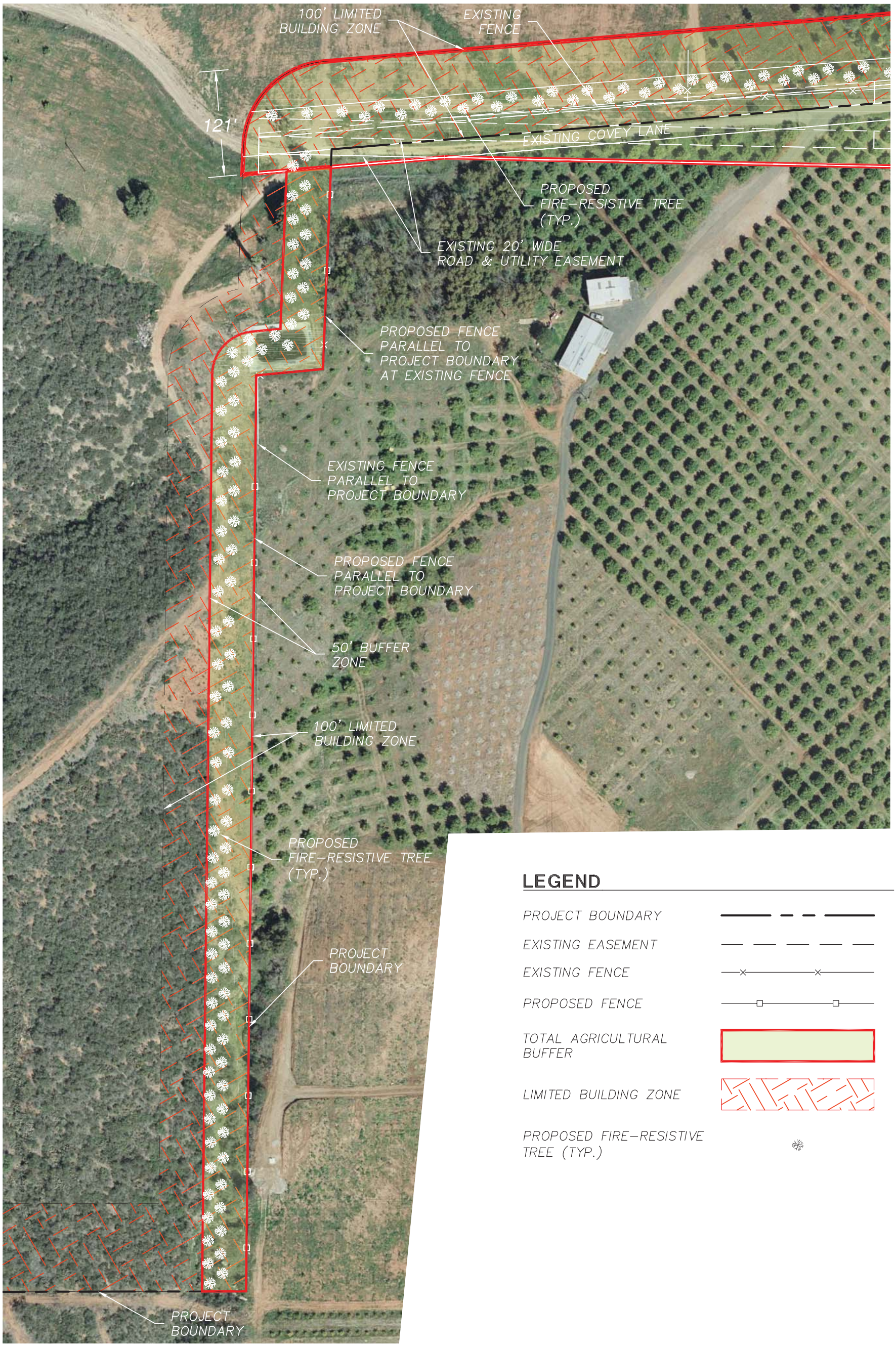

FIGURE 16c
Agricultural Adjacency Area 5

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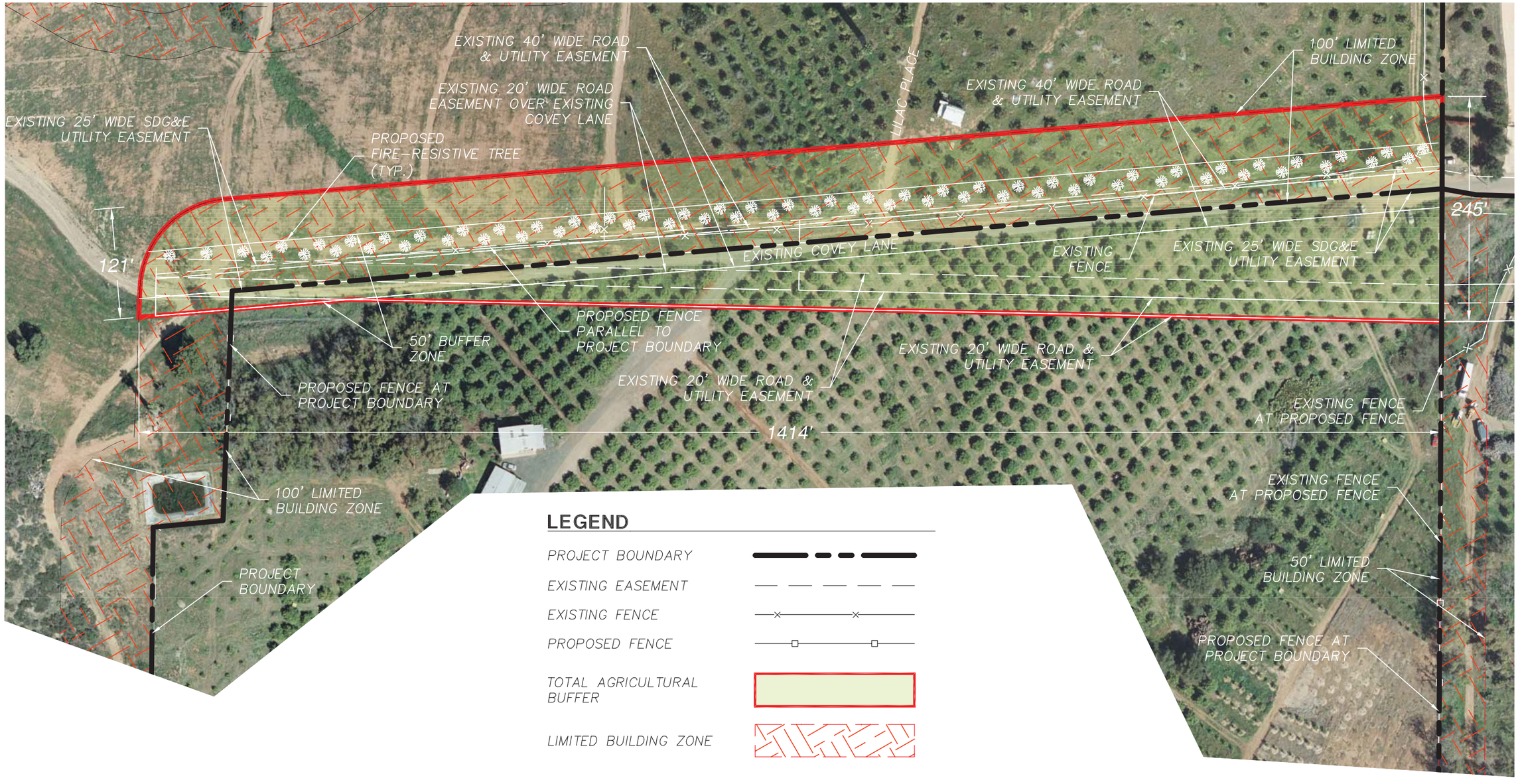

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FIGURE 16d

Agricultural Adjacency Area 6

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Map Source: Landmark Consulting, 2013

FIGURE 16e
Agricultural Adjacency Area 7

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Map Source: Landmark Consulting, 2013

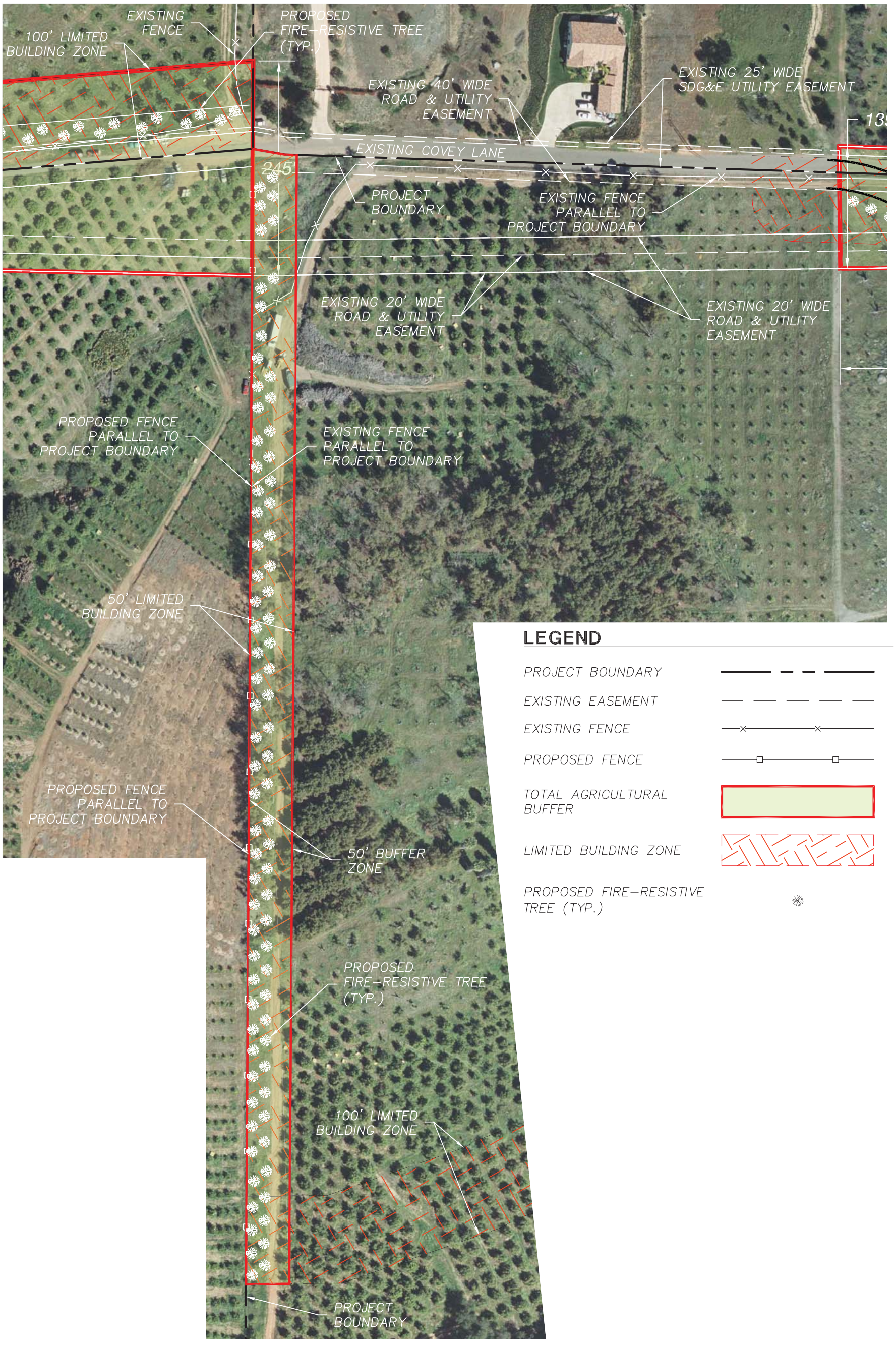

FIGURE 16f
Agricultural Adjacency Area 8

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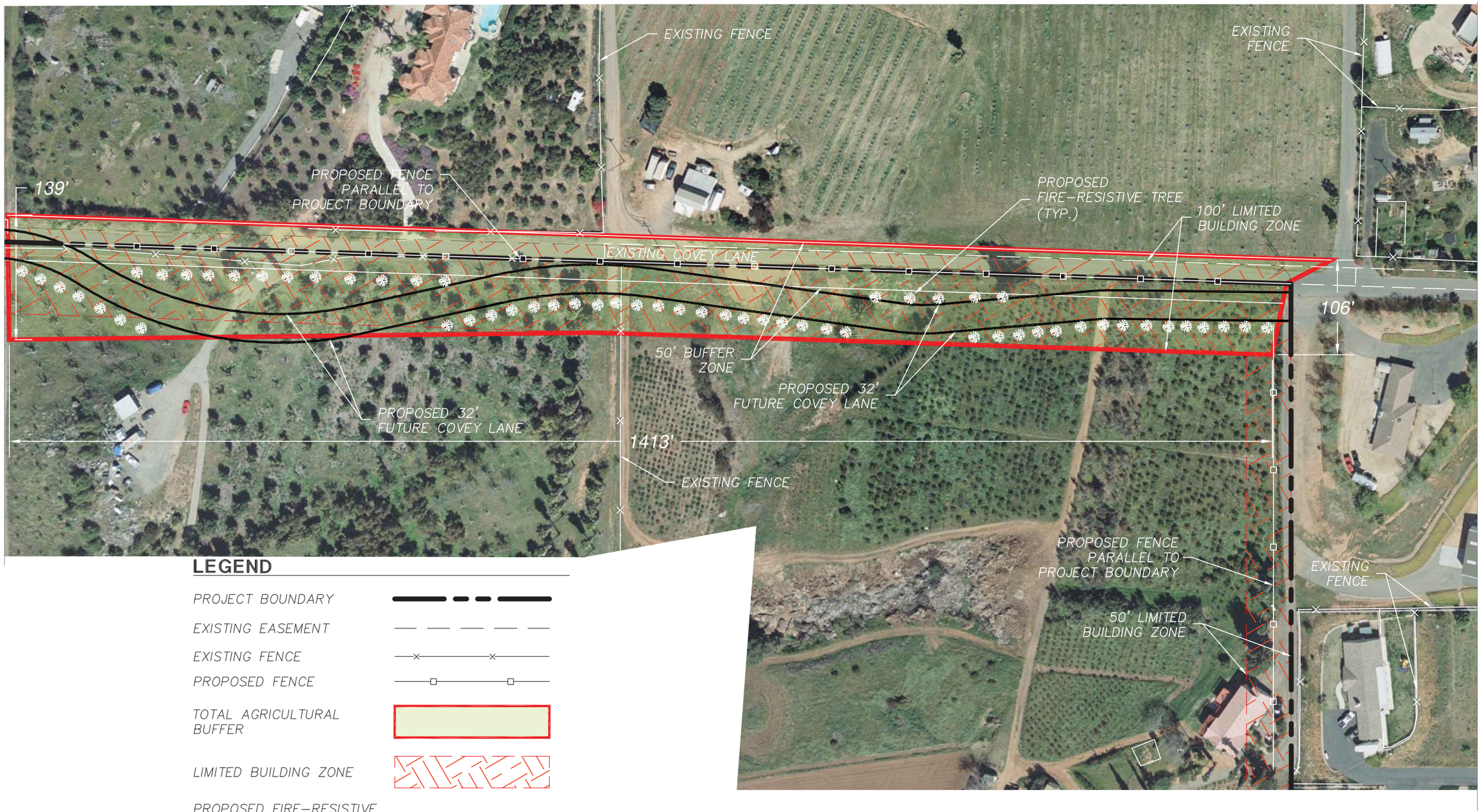

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FIGURE 16g

Agricultural Adjacency Area 9

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Map Source: Landmark Consulting, 2013

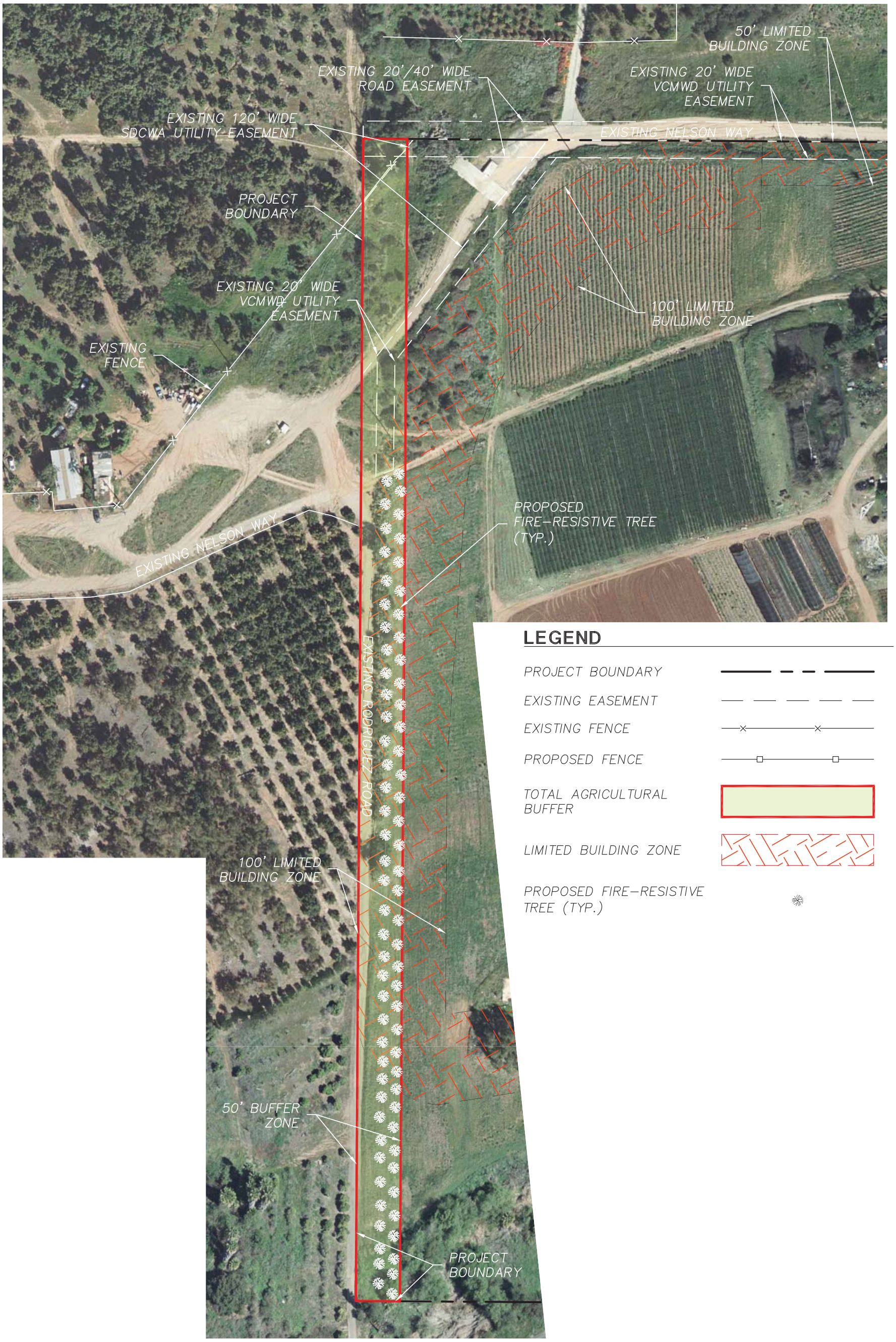

FIGURE 16h
Agricultural Adjacency Area 10

RECON

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Map Source: Landmark Consulting, 2013

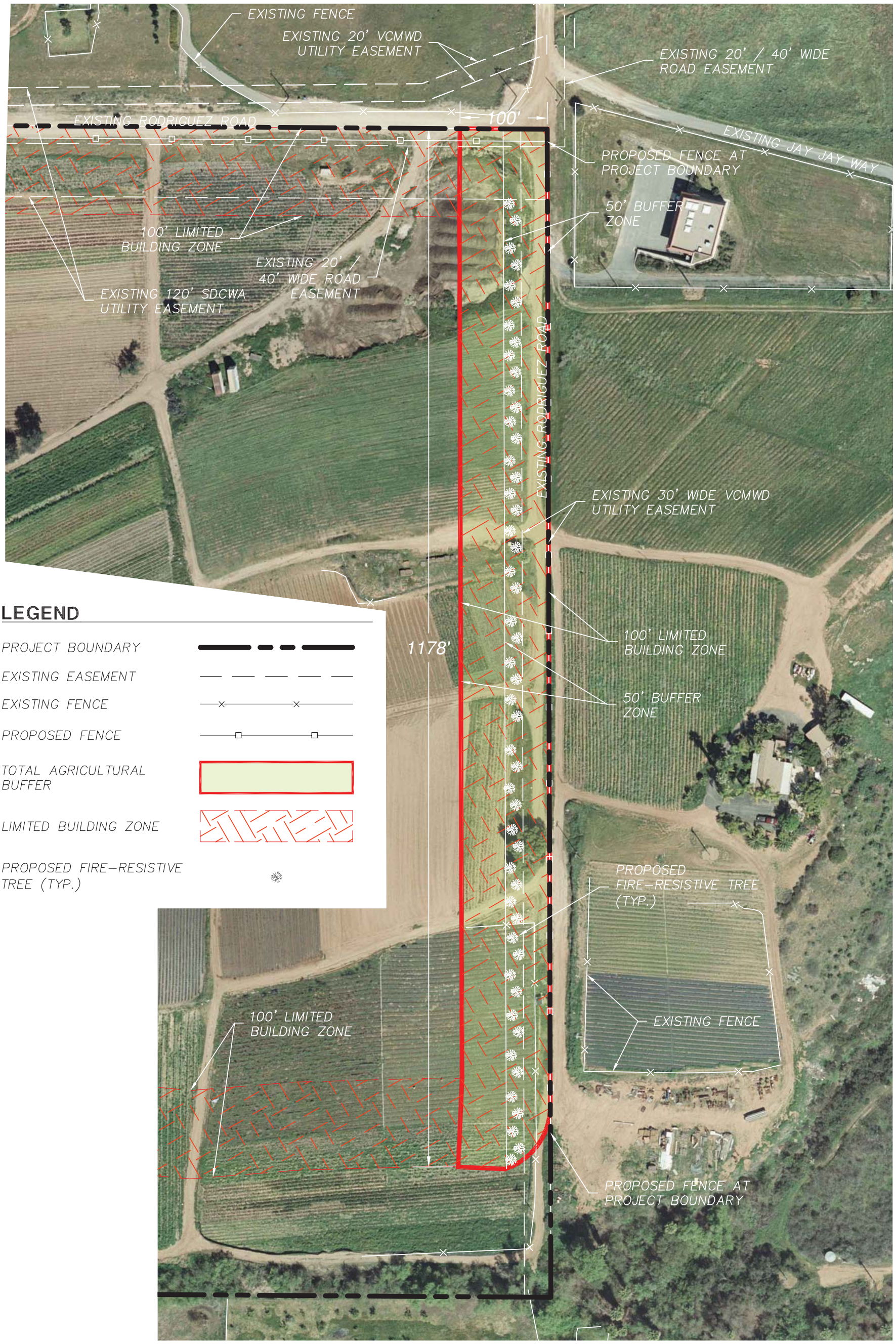

FIGURE 16i
Agricultural Adjacency Area 13

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- AA 1 is located along the northern project boundary. There is a large area of orchards located approximately 150 feet off-site from the residential uses proposed as part of Phase 1. There is an off-site residential parcel, between the orchards and the project site. Figure 10 shows that pesticide applications occur within the off-site agricultural parcels; however, the parcel nearest AA 1 utilizes ground applications only. There would be intervening topography, approximately 50-90 feet of FMZ, the West Lilac Road ROW, and an off-site residential parcel providing an adequate buffer between the off-site agricultural uses and proposed on-site residential uses. These considerations would ensure that indirect-compatibility impacts at this location would be less than significant.

- Adjacent to the extreme northwestern corner of the project site, across West Lilac Road, AA 2 includes another large area of orchards which have been subject to aerial pesticide applications (see Figure 2.4-4). There is a potential for compatibility impacts to this existing agricultural land. However, West Lilac Road is to be improved to a width of 78 feet and 50 and 90 feet of FMZ on-site. The combination of FMZ and road improvements (the total ranging from between 128 to 168 feet) ~~AA 2 is located in the extreme northwestern corner of the project site, adjacent to West Lilac Road, and includes another large area of orchards, which have been subject to aerial pesticide applications (refer to Figure 10). This approximately 44-acre property (Marquart Ranch) has filed a Final Map (TM 5410) where these orchards are adjacent to the northwest corner of the project site. There is a potential for compatibility impacts to arise in association with the remaining sliver of agricultural land directly adjacent to West Lilac Road. However, West Lilac Road is to be improved with 78 feet ROW width and there would also be between 50 and 90 feet of FMZ on-site. The combination of FMZ and ROW width~~ would provide adequate separation between on-site uses and off-site agricultural operations. Impacts at this AA would be less than significant.

- Along Standel Lane, AA 3 is also located along the northwestern corner of the project site. To the west (approximately 130 feet away) is a youth camp and religious retreat (Camp Kuper), estate residence and groves (see Figure 16a). As shown on Figure 10, this operation has not been subject to aerial (helicopter) spraying in the past five years; the likely reason being the presence of the Camp Kuper and the existing residence. While the indirect-compatibility effects associated with AA 3 would not include aerial pesticide applications; other edge effects such as noise, dust, odors, and theft/trespass could still result in potentially significant impacts. There is an existing 60-foot road and utility easement along AA 3, with approximately half being within the project site and half off-site. The half-width (30 feet), ~~The ROW width of~~ which includes Standel Lane, ~~is only 20 feet, and~~ does not, by itself, provide an adequate separation of land use. Therefore, a significant indirect agricultural adjacency impact would occur at this location.

As shown in Figure 16a, Mitigation Measures 2~~1~~ and 4~~3~~ would be required along AA 3. Implementation of these mitigation measures would effectively serve to provide adequate separation between the on- and off-site uses to assure compatibility both to and from the off-site operation. With implementation of this mitigation, the 30-foot half-width of the road/utility easement would work on conjunction with the 50-foot agricultural buffer on-site for a total of 80 feet. Therefore, impacts would be reduced to less than significant at this location.

- AA 4 is located along the southwestern corner of Phase 1 near the existing water tanks (see Figure 16b). The project would retain a portion of the existing orchards surrounding the "NAP" water tanks. In addition, a park (Park ~~"~~P-1~~"~~) is proposed directly south of the water tanks. Off-site agriculture includes orchards directly west of the water tanks, as well as orchards and estate residences to the south of the water tanks. The proposed park as well as the retention of existing orchards surrounding the water tanks would adequately buffer AA 4 from the off-site agriculture. For those areas where orchard trees off-site are adjacent to non-agricultural uses on-site, the project includes a limited building zone (LBZ) which expands the total buffer from 50 feet (the agricultural buffer with two rows of orchard trees) to 75 feet. However, significant impacts would occur along those areas within AA 4 that contain orchard trees but are not immediately adjacent to the on-site retained orchards.

- As shown in Figure 16b, Mitigation Measures ~~1 and 3~~2 and 4 would be required along AA 4. Implementation of these mitigation measures would effectively serve to provide adequate separation between the on- and off-site uses to assure compatibility both to and from the off-site operation. With this mitigation, impacts would be reduced to less than significant at this location. For those aforementioned areas where orchard trees off-site are adjacent to non-agricultural uses on-site, AA 4 also overlays a LBZ that expands the total buffer from 50 feet (the agricultural buffer with two rows of orchard trees) to 75 feet.

In summary, development of Phase 1 would result in the construction of residential units in close proximity to the mixed orchard operations occurring both north and south of West Lilac Road and west of Standel Lane. The Marquart TM would convert the existing orchards north of the northwest corner of the project site to residential use. Pursuant to the County's Agricultural Enterprises and Consumer Information Ordinance (right-to-farm), disclosure statements are required to be included in sales documentation for all proposed residential units. The statements would notify potential owners that the adjacent property could potentially be used for agricultural operations and that there could be associated issues such as odors, noise, and vectors. The project also includes a FMZ along most of the off-site boundary of this phase.

Significant indirect agricultural adjacency impacts would occur at AA 3 and AA 4. Mitigation measures identified above would be implemented throughout Phase 1, in addition to the

PDCs. Therefore, pursuant to Guideline 3.1.c, significant indirect impacts for Phase 1 would be reduced to less than significant.

3.2.3.2 Phase 2

Phase 2 would be located just south of Phase 1. The 89.6-acre area would be the location of the Town Center and is planned for a maximum of 466 residential units including those within the within Commercial/Mixed-Use zones. As shown on Figure 16, Phase 2 lies entirely within the interior of the project site and does not border any agricultural adjacency areas. Three of the four "NAP" parcels within the project site are within or share a boundary with Phase 2. Two of the NAP parcels within Phase 2 are estate residential uses that would not pose any agricultural adjacency issues. The third, an irregularly shaped parcel, contains greenhouse/nursery operations which are limited to the southern portion of the "NAP" parcel that is approximately 400 feet from the Phase 2 land uses. Therefore, indirect impacts associated with Phase 2 would be less than significant.

3.2.3.3 Phase 3

Phase 3 encompasses 223 acres directly south of Phase 2. This phase is planned for 460 residential units, 7,500 square feet of commercial, as well as the school site, the WRF, detention basin, parks including a 13.5-acre public park to be dedicated to the County, and a 2.0-acre Community Purpose Facility area, which could ~~to~~ include a fire station and private recreation facilities.~~, and 7,500 square feet of commercial~~ Along the entire western boundary of Phase 3, biological open space would be preserved which would also function as compatibility buffers for the off-site agricultural operations occurring to the west of Shirey Road. No conflicts would occur along the northern boundary or at the southeastern corner where Phase 3 borders the corner of Phase 4. However, AA areas 5, 6, and 7 lie along the eastern and southeastern boundaries of Phase 3 (see Figure 16). These AA areas are analyzed further as follows:

- AA 5 involves the placement of residential uses directly adjacent to the off-site groves that are surrounded on three sides, by the project. The location of this AA, surrounded by off-site agricultural uses~~,~~ would result in a significant indirect agricultural adjacency impact at this location. As shown in Figure 16c, Mitigation Measures 2~~1~~, 3, and 4~~2~~ would be required along AA 5. The combination of the 50-foot agricultural buffer (with two rows of trees) in conjunction with the 100-foot LBZ and a six-foot fence means that there would effectively be over 100 feet of separation between the off-site orchards and the on-site uses. Implementation of these mitigation measures would effectively serve to provide adequate separation between the on and off-site uses to assure compatibility both to and from the off-site operation. Impacts would be reduced to less than significant at this location.

Property Specific Request (PSR) number VC11 encompasses the area adjacent to AA 5 (as well as AA 6 and AA 8). The PSR for this property, as well as other properties adjacent to the project site (including VC20B, VC11, and VC54), proposed to ~~would~~ redesignate the parcel's ~~General Plan designation~~ from SR4 to SR2. If VC11 converts to a non-agricultural use prior to the development of Phase 3, implementation of Mitigation Measure 2~~1~~ would not be required at this location.

- AA 6 is located along the southern boundary of proposed school and public park (Park P-10). The school would be more than 300 feet away from the off-site agriculture, as the proposed park site intervenes. In this case, the most likely compatibility impacts to the agricultural sites would be trespass (people and pets), noise, liability concerns including theft and vandalism, water runoff and urban pollutants (from park irrigation). Compatibility concerns to the proposed project would include pesticide drift and potential noise from nearby agricultural activities.

  The project ~~includes a 100-foot FMZ at this location, and~~ would implement Best Management Practices (BMPs) as detailed in the Hydrology Reports prepared for the project to assure that run-off from the site would not increase in volume and would ~~,~~ not carry pollutants off-site. Notwithstanding the PDCs, the placement of the park at this location (because of its sensitive users) would result in an indirect agricultural adjacency impact at this location.

  As shown in Figure 16d, Mitigation Measures ~~1, 2, and 3~~2, 3, and 4 would be required along AA 6. In addition, the off-site property includes the half width of the 40-foot road/utility easement along Covey Lane. Therefore, the combination of the agricultural buffer, the LBZ, and the Covey Road easement provides a total of 121 feet of separation between on-site uses and off-site agriculture. As with the other AA areas, the six-foot masonry fence would also be provided as described above. Implementation of these mitigation measures would effectively serve to provide adequate separation between the on- and off-site uses to assure compatibility both to and from the off-site operation. With this mitigation, impacts would be reduced to less than significant at this location.

- AA 7 is located along the eastern boundary where the proposed residential uses are adjacent to off-site flower crop production with nursery/greenhouse uses. The production of cut flowers is a labor intensive operation, but is not generally associated with dust or noise, as mechanized equipment is not used because of the nature of the crop. A background paper, "Edge Planning Areas – Promoting Compatibility along Urban-Agricultural Edges" (Ministry of Agriculture and Lands 2006) includes "nursery" (a broad category including flower crops) as having "traditionally high compatibility" with non-agricultural uses. In addition, aerial spraying is not used for cut flower or nursery crops so pesticide use would not be a factor. ~~A FMZ of varying widths is proposed along this area.~~ With respect to indirect impacts **to** this flower operation **from** the project, lighting would be required to be

shielded and directed away from the off-site parcels (as described in Specific Plan Section 3.D.10 and listed below a PDC). Notwithstanding the type of agricultural operation and PDC, the location of the agricultural operations adjacent to project site, would result in an indirect agricultural adjacency impact at this location.

As shown in Figure 16e, Mitigation Measures 2~~1~~ and ~~,~~ 3 ~~2, and 3~~ would be required along AA 7. A 100-foot LBZ (Mitigation Measure 4) supplements the 50-foot agricultural buffer along 1,122 linear feet (out of 2,159 feet total) of AA 7. Implementation of these mitigation measures would effectively serve to provide adequate separation between the on and off-site uses to assure compatibility both to and from the off-site operation. With this mitigation, impacts would be reduced to less than significant at this location.

PSR number VC54 encompasses the flower/nursery operation adjacent to AA 7, and if approved could result in the agricultural use converting ~~on its own~~ to residential uses, essentially removing the compatibility issue. If VC11 converts to a non-agricultural use prior to the development of Phase 3, implementation of Mitigation Measures 2~~1~~ and 4~~3~~ would not be required at this location.

In summary, Phase 3 includes biological open space along its western and much of its northern boundaries and FMZs along the southeastern and eastern boundaries. PDCs are included within this portion of the project site including FMZ, the requirement for disclosure statements to be included in sales documentation for all proposed residential units pursuant to the County's Right-to-Farm Ordinance, and on-site lighting restrictions.

Significant indirect agricultural adjacency impacts would occur at AAs 4, 5, and 7. Mitigation measures identified above would be implemented throughout Phase 3, in addition to the PDCs. Therefore, pursuant to Guideline 3.1.c, significant indirect impacts for Phase 3 would be reduced to less than significant.

3.2.3.4 Phase 4

Phase 4 would be located southeast of Phase 3 and is planned for 171 single-family senior residential units. Also proposed within Phase 4 are a 3.3-acre senior center, a 200-bed assisted living facility, a pocket park, and a detention basin. Phase 4 has a large east-west trending biological open space corridor. No conflicts would occur along the eastern boundary or at the southwestern inset, where Phase 4 borders only on undeveloped land or estate residential uses. However, AA 8 and AA 9 lie along the northern, and a portion of the western boundaries of Phase 4 (see Figure 16). These AA areas are analyzed further as follows:

- The age-restricted residential uses along a portion of the western boundary of Phase 4 are within AA 8. As shown in Figure 10, there are intensively farmed groves to the west of Phase 4. These same groves are also associated with AA 5

and AA 6 as discussed above. Similarly, AA 8 would involve the placement of residential uses directly adjacent to the off-site groves that are surrounded on three sides by the project. ~~The project includes a FMZ of varying widths along the boundary of this area.~~ The location of this AA, adjacent to off-site agricultural uses, would result in a significant indirect agricultural adjacency impact at this location.

As shown in Figure 16f, Mitigation Measures ~~1, 2, and 3~~2, 3, and 4 would be required along AA 8. Implementation of these mitigation measures would effectively serve to provide adequate separation between the on- and off-site uses to assure compatibility both to and from the off-site operation. With this mitigation, impacts would be reduced to less than significant at this location.

VC11 is adjacent to AA 8. In the case where VC11 is converted to a non-agricultural use prior to the development of Phase 4, implementation of Mitigation Measures 2~~1~~ and 4~~2~~ would not be required at this location.

- AA 9 is located in the northeastern portion of Phase 4 and contains residential uses that are adjacent to off-site agricultural groves (see Figure 16g). In addition to a 100-foot ~~FMZ~~LBZ proposed at this location, there would be an additional ~~80 feet of~~physical buffer resulting from the realignment of the 32-foot Covey Lane (see Figure 16g). Notwithstanding the separation of on-site uses, the location of this AA, adjacent to off-site agricultural uses, would result in a significant indirect agricultural adjacency impact at this location.

  As shown on Figures ~~14~~16g, Mitigation Measures ~~1, 2, and 3~~2, 3, and 4 would be implemented requiring both the 50-foot buffer and additional restrictions on the placement of structures within the ~~FMZ~~LBZ. In this particular location, only a single row of trees staggered between the road alignment would be feasible. Due to the additional separation of uses afforded by the improvement of Covey Lane, this would provide a separation ranging from 106 to 139 feet, which would be adequate buffering at this location. Overall, implementation of the mitigation measure - plus the width of the Covey Lane ROW, in conjunction with other design considerations including disclosure statements, would reduce indirect impacts to less than significant.

In summary, development of Phase 4 would result in the construction of age restricted residential units in close proximity to the agricultural operations occurring along the western boundary of this phase as well as along Covey Lane (AAs 8 and 9). As required by the County's Agricultural Enterprises and Consumer Information Ordinance, disclosure statements would be required, which would notify potential owners that the adjacent property could potentially be used for agricultural operations. Additionally, a ~~FMZ~~LBZ would be placed along these AAs.

Significant indirect agricultural adjacency impacts would occur at AAs 8 and 9. Mitigation measures identified above would be implemented throughout Phase 4, in addition to the PDCs. Therefore, pursuant to Guideline 3.1.c, significant indirect impacts for Phase 4 would be reduced to less than significant.

3.2.3.5 Phase 5

Phase 5 would be located directly south of Phase 4. Phase 5 is planned for 297 single-family senior residential units, pocket parks, and 10.0 acres for institutional use. Also included in Phase 5 is a detention basin. As with Phase 4, Phase 5 has a large east-west trending biological open space corridor which runs along the southern project boundary. This biological corridor would include wetland buffers, as well as retained agriculture, the total width of which would vary between 150 and 500 feet. AAs 10 through 13 are analyzed further as follows:

- AA 10 is adjacent to active orchards, which are subject to aerial spraying (see Figure 10). ~~A 100-foot FMZ is proposed in this area. Notwithstanding the FMZ,~~ The location of this AA, adjacent to off-site agricultural uses, would result in a significant indirect agricultural adjacency impact at this location.

  As shown on Figure 16h, Mitigation Measures ~~1, 2, and 3~~2, 3, and 4 would be required along AA 10. In addition, there is an San Diego County Water Authority easement ranging from 20 to 120 feet in width and a 20-foot VCMWD easement. Furthermore, the LBZ (Mitigation Measure 4) angles to the northeast because of the 20- to 40-foot roadway easement for Nelson Road. In places, the total separation between land uses along AA 10 is over 200 feet wide but is no less than 100 feet wide where proposed on-site uses would be adjacent to orchards that are aerially sprayed. Implementation of these mitigation measures would effectively serve to provide adequate separation between the on and off-site uses to assure compatibility both to and from the off-site operation. With this mitigation, impacts would be reduced to less than significant at this location.

  AA 10 is adjacent to PSR number VC20B, which is a request for General Plan designation amendment from SR4 to SR2. As previously discussed, the PSRs have been approved for inclusion in a comprehensive amendment to the General Plan to analyze impacts associated with proposed land use changes. In the instance that the VC20B area is approved for non-agricultural uses prior to the development of Phase 5, implementation of Mitigation Measures 2~~1~~ and 4~~2~~ would not be required at this location.

- AA 11 is adjacent to off-site orchards while AA 12 adjoins off-site estate residential uses. The entire southern boundary of Phase 5 includes an east-west trending biological open space corridor (with some retained agriculture along the periphery). The width of this corridor varies from approximately 150 feet to 500 feet and would

serve to ensure that indirect impacts would be less than significant for AA 11 and AA 12.

- AA 13 is adjacent to nursery/greenhouses and flower crops ~~along~~ to the east of Phase 5. Figure 10 shows that the fields nearest AA 13 are not subject to aerial or ground pesticide applications; the nearest pesticide applications occur approximately 280 feet from the project boundary. ~~Additionally, a 100-foot FMZ is proposed along this area.~~ However, due to the proximity of off-site operations, significant indirect agricultural adjacency impact would result at this location.

  As shown on Figure 16i, Mitigation Measures ~~1, 2, and 3~~2, 3, and 4 would be required along AA 10. Along AA 13, the LBZ (Mitigation Measure 4) supplements the 50-foot agricultural buffer (Mitigation Measure 2) to expand the total separation width to 100~~-~~ feet. Implementation of these mitigation measures would effectively serve to provide adequate separation between the on- and off-site uses to assure compatibility both to and from the off-site operation. With this mitigation, impacts would be reduced to less than significant at this location.

In summary, Phase 5 includes biological open space along its southern boundary. The retention of the biological open space along the southern boundary would be sufficient to ensure that impacts relative to AAs-11 and 12 would be less than significant. The western boundary is adjacent to orchard uses and impacts along AAs 10 and 13 would be significant. Mitigation measures identified above would be implemented throughout Phase 5, in addition to the PDCs. Therefore, pursuant to Guideline 3.1.c, significant indirect impacts for Phase 5 would be reduced to less than significant.

3.2.3.6 Interim Phasing

During the phased build-out of the project, the applicant/owner intends to continue leasing the property to farmers who operate the existing orchard and field crop operations, throughout the project site. This would create a somewhat unusual situation where temporary agriculture (under the control of the HOA) would operate in close proximity to new, on-site non-agricultural uses, as the project develops over time. Unlike the AA areas analyzed in the preceding paragraphs; there are no internal buffers or ~~FMZ~~LBZ incorporated within the project design, which would address potentially significant internal interface impacts. Subchapter 3.3 below includes Mitigation Measure 5~~4~~, which would serve to reduce significant urban/agricultural compatibility impacts resulting from residential uses of ~~, within~~ early phases being constructed adjacent to ongoing agriculture of ~~, within~~ subsequent phases.

3.2.3.7 Other Compatibility Issues

Other edge effects ~~which~~ can contribute to a premature conversion of agriculture; these are discussed individually as follows:

- Storm water runoff – Although current regulatory requirements protect off-site properties (e.g., National Pollutant Discharge Elimination System ~~NPDES~~) from this type of indirect impact; this can still be an issue for agricultural operators. Urban runoff can contain pollutants and other chemicals (e.g. lawn fertilizer/pesticides) that can damage some crops. Further, some crops can be damaged from too much irrigation water or water with high levels of total dissolved solids (TDS). The project ~~was required to~~ addressed these impacts through engineering documents and studies. Specifically, the project was required to prepare and implement a Drainage Study, Stormwater Management Plan (SWMP), and Hydromodification Plan (HMP). The project's hydrology documents (Landmark Consulting~~,~~ 2013a–c) provide~~s~~ calculations of anticipated increases of flow volumes and hydromodification measures to be employed by the project to reduce and eliminate potential impacts~~,~~ to receiving waters. Adding all grading limits and fire management buffer areas, runoff volumes would be as follows.

	Basin 100	Basin 200	Basin 300
Pre-development	320.2 ac-ft	267.3 ac-ft	123 ac-ft
Post-~~D~~development	345.3 ac-ft	249.4 ac-ft	132.9 ac-ft

ac-ft = acre-feet

The project design includes hydromodification ponds (also known as detention ponds) within each of the three sub-basins to alleviate the anticipated excess runoff as a result of the increase in impervious areas. Through implementation of these design features, the proposed development will not adversely affect off-site agricultural properties. Additionally, the project includes incorporation of the requisite Low Impact Development (LIDs), BMPs, and hydromodification design features that would reduce runoff to less than significant levels.

- Hazardous materials storage – Any on-site storage of fuels or pesticides for use, within agricultural areas, whether long-term or in the interim during phasing, would be under control of the project HOA (long-term) or the farming manager (short-term). In the long-term, any agricultural uses would be comprised of groves within common open space or manufactured slopes. HOA regulations would require that the agricultural uses be a low-intensity, not-for-profit use where minimal pesticides would be required. Maintenance of the orchards would be regulated through provisions within the Master Covenants Conditions and Restrictions for the community. Such regulations would include an on-site ban on aerial pesticide spraying; restrictions on the types of fertilizers that could be used, so as to reduce odor impacts to surrounding sensitive receptors; and limitations on the types of

equipment and hours of operation of maintenance activities. All pesticide and hazardous materials storage and use will comply with the State requirements and the applicable regulations enforced by the County Agriculture Weights and Measures. Off-site farmers would be subject to existing regulatory requirements regarding the storage of fuel, fertilizers, and pesticides. With respect to homeowner complaints about hazardous materials storage practices by the adjacent farmers; as discussed above in subchapters 3.2.3.1 through 3.2.3.5, AAs 3 through 10 and 13, where there are agricultural uses immediately adjacent to the project boundary, the incorporation of Mitigation Measure 2~~1~~ would reduce impacts to less than significant.

- Invasive pests and pets – These can include pest populations (e.g., feral cats and household domesticated pets, etc.) from urban areas or introduced plants from unmaintained landscaping. These non-native or invasive pests and pets can damage adjacent agriculture operations or be a costly nuisance, to the farmer. As described in subchapters 3.2.3.1 through 3.2.3.5, all areas on-site that are adjacent to off-site agricultural uses would include implementation of Mitigation Measures 2~~1~~ and 3~~2~~. Implementation of these mitigation measures would provide adequate separation between potential sources of pests and pets, as well as on-site invasive seeds (e.g., unmaintained ornamental) and the off-site agricultural uses. Based on the implementation of Mitigation Measures 2~~1~~ and 3~~2~~ throughout the project site, and other PDCs, these significant impacts would be reduced to less than significant. In particular, Mitigation Measure 3 requires implementation of a solid masonry wall with a foundation that extends below ground surface with no gaps for pets and pests to utilize.

- Pathogens/Diseases – A documented example of this occurring is where ~~when~~ equestrian/hiking trails are located within areas containing orchards, particularly avocado trees, and ~~where~~ the spores of the root rot disease are spread by the horse's hooves or the shoes of trail users and domestic animals. While agriculture would remain on-site post-development, it would be non-contiguous and maintained by the HOA. No commercial (for profit) agricultural uses would be retained, on the project site~~,~~ at build-out. No trails are proposed through adjacent, off-site agriculture areas nor would trails be constructed through the latter phases of the Specific Plan area, where agricultural operations are ongoing. The exception to this would be the regional Multi-Use Trails. As shown on Specific Plan Figure 20, the project would be responsible for implementing the on-site portions of the County's Multi-Use Trail system along the northern boundary paralleling West Lilac Road. Further, as described in subchapters 3.2.3.1 through 3.2.3.5, all areas on-site that are adjacent to off-site orchards would include Mitigation Measures 2~~1~~ and 3~~2~~. Similar to invasive pests and pets, these mitigation measures would provide adequate separation between potential carriers/transmitters of agricultural pathogens and diseases and the off-site receptors (agricultural uses). Therefore, ~~and~~ significant impacts would be reduced to less than significant.

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

- Nighttime lighting – New development can be a source of nighttime lighting, which can affect the growth patterns of greenhouse crops. There are greenhouses located within the "NAP" parcel adjacent to Phase 2 and off-site approximately one-third of a mile to the east of the project site. With respect to indirect impacts to this flower operation from the project; lighting would be required to be shielded and directed away from the off-site parcels (see Specific Plan Section 3.D.10 and PDC-2 listed below). The proposed project would also include a lighting plan that would conform to the San Diego Light Pollution Code (Sections 59.108-59.110). Lights would be shielded to prevent glare onto neighboring roadways and adjacent open space. Additionally, project outdoor lighting would be fully shielded and restricted to 4050 lumens in conformance with the Light Pollution Code Zone B requirements. With respect to indirect impacts to new residential uses from agricultural operations (potentially generating nuisance complaints); the adjacent orchards and flower fields are not artificially lit at night and the nearest agricultural structure to the project boundary, which may be lit (e.g. greenhouse/nursery) is approximately 240 feet away.

~~In addition to the noise, dust, pesticide, runoff and lighting impacts discussed in Sections 3.2.3.1 through 3.2.3.5 above, A~~a~~a~~ll of the issues described above can be contributors to the degradation of the viability of off-site farms. All of these listed impacts would be less than significant, based on the following: (1) the crop types found within the vicinity are primarily citrus and avocado groves and flower/nursery operations which are not usually found to be incompatible with residential uses; (2) the proposed residential uses do not create conditions (e.g., air contamination/degradation or night-time lighting impacts) as discussed above that would adversely affect off-site agriculture; (3) the project would be subject to regulatory requirements for the control of discharge (e.g., NPDES/County requirements, BMPs, etc.); and (4) the project would include homeowner disclosure documents (pursuant to the Agricultural Enterprises and Consumer Information Ordinance). Additionally,

implementation of Mitigation Measure 2~~1~~ would reduce impacts associated with the degradation of the viability of off-site farms to less than significant.

3.3 Mitigation Measure and Project Design Considerations

Throughout this document, a variety of potential conflicts that can occur between agricultural and non-agricultural uses is discussed. Site specific conditions were evaluated at AAs 1 through 13 and each had unique characteristics and the potential to create nuisance complaints and other compatibility issues both **to** and **from** adjacent agricultural operators and **to** and **from** proposed new residential uses. However, as discussed in the County Guidelines, agricultural compatibility buffers are the primary tool to reduce potential conflicts, between existing operations and the neighboring property owners. As discussed in subchapter 3.2.3 ~~above~~, several locations around the perimeter of the project could result in significant indirect (compatibility) impacts. Accordingly, the project would implement the following mitigation measures and PDCs:

- Mitigation Measure 2~~1~~, requiring 50-foot agricultural buffers planted with two rows of orchard trees, would be implemented along AAs 3 through 10 and 13 (one staggered row in AA 9). In general, buffer areas such as this, are placed between existing land uses and new development ~~when the timing of development of properties with different owners, environmental constraints or other factors prevent new land use patterns~~ to ensure compatibility. Specifically, this buffer area would be an area of land maintained in permanent vegetation as a tool to create space and compatibility between new on-site residential uses and the existing off-site agricultural operations. The 50~~-~~ feet, planted with two rows of orchard trees, provides adequate buffering because it provides enough separation to allow each use to operate independent of the other without disturbance. The two rows of trees, in particular, allow a visual buffer as well as a ~~-~~spatial separation.

- Mitigation Measure 3~~2~~, requiring the maintenance of a 6-foot fence, would likewise be implemented along AAs 3 through 10 and 13. Fencing is an effective solutions for keeping animals out of neighboring areas, A 6-foot fence placed between the project and off-site agricultural operations provides reasonable deterrent to domesticated animals. The fence shall be restricted to one of two types (refer to Exhibit 137 of the Specific Plan): (1) the solid masonry type with a foundation that extends below ground level and with no gaps; or (2) the type that is a combination of approximately two-thirds masonry and one-third metal fencing. ~~A chain link fence in particular is not attractive to cats because there is no place for a cat to get its footing to actually climb to the top~~.

- Mitigation Measure 43, requiring additional restrictions applied within the existing ~~FMZ~~LBZ would prohibit not only habitable structures but any structure or feature that could attract residents or children, would be incorporated at AAs 3, 4, 6 through 10, and 13.

- Mitigation Measure 54 would ensure that interim agricultural uses, as the project is phased in over time, would not create indirect impacts.

The project includes PDC as follows:

- Disclosure statement required by the San Diego County Agricultural Enterprises and Consumer Information Ordinance, in all sales documentation for all proposed residential units if agricultural uses are still in existence at the time new homes are constructed.

- New nighttime lighting proposed by the project would be required to be shielded and directed away from the off-site parcels.

- ~~FMZ~~LBZs of varying widths are proposed around the perimeter of the project site.

Overall, implementation of the project's PDCs and Mitigation Measures 21 ~~1~~ through 54 ~~4~~ would ensure that potentially significant indirect impacts would be reduced to less than significant for all identified AA areas.

3.3.1 Mitigation Measures

3.3.1.1 Mitigation for Indirect Impacts – Compatibility

Mitigation Measure ~~1.~~2: A 50-foot-wide agricultural buffer planted with two rows of the appropriate tree crop (e.g., citrus, avocado) shall be provided. This buffer shall be ~~is~~ located where residential uses in Lilac Hills Ranch would abut existing, adjacent orchards and will be used to create a transition and buffer between the two uses.

Mitigation Measure 32: A 6-foot-high fence shall be maintained along the specified AAs to prevent trespass and intrusion by people and domesticated pets. The fence shall be restricted to one of two types (refer to Exhibit 137 of the Specific Plan): (1) the solid masonry type with a foundation that extends below ground level and with no gaps; or (2) the type that is a combination of masonry and metal fencing.

Mitigation Measure 43: A Limited Building Zone shall ~~,~~ prohibit~~ing~~ habitable structures as well as any structure which could attract residents, visitors, or children to within close proximity to the AA area (and the proximate agricultural operations). The LBZ shall ~~prohibition would~~ extend to (but is not limited to) ball fields, swimming pools, horseshoe pits, picnic areas, or any other use that would attract or keep people near the project boundary or

AA. This LBZ shall ~~would~~ ensure that residents would not be congregating within areas in proximity to off-site pesticide application.

3.3.1.2 Mitigation for Indirect Impacts - Interim Phasing

Mitigation Measure 54: Pursuant to the Specific Plan Figure 142, the project shall include a 100-foot fuel modification zone/limited building zone between ongoing agricultural uses and residential development, for each phase of development. The fuel modification zone/limited building zone shall comply with all state law and county agricultural, weights and measures regulations. ~~As set forth in the Specific Plan, t~~The applicant/HOA shall ~~exercise control over interim agricultural operations on-site through specific terms of agricultural leases. Through the execution of agricultural leases, the applicant/HOA will prohibit aerial pesticide spraying and will take all precautions to minimize other impacts (both to and from future residents) including noise and dust generation, trespassing, and vandalism. All storage and use of hazardous materials and pesticides within these agricultural areas shall comply with all State Law and the County Agricultural, Weights and Measures Regulations.~~

3.3.2 Project Design Considerations

PDC-1 A Fuel Modification Zone would be maintained at varying widths around the perimeter of the project site as identified in the Fuel Protection Plan prepared for the project.

PDC-2 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 shall ~~would~~ notify potential owners that the adjacent property could potentially be used for agricultural operations such as fruit and flower production and that there could be associated issues such as odors, noise, and vectors. The notice shall ~~would~~ also notify future residents that these agricultural uses within the vicinity of the project maintain certain rights to practice agriculture in accordance with normal and accepted practices.

PDC-3 The lighting and illumination standards for Lilac Hills Ranch shall ~~will~~ be complementary to the architecture and land uses throughout the project area. Community lighting shall ~~will~~ be designed to provide adequate illumination for safety, security, and architectural accents without over lighting. Light fixtures will direct light to use areas and avoid light intrusion into adjacent agricultural and other land use areas. Light shields shall ~~will~~ be used where necessary to avoid nuisance lighting, particularly in residential neighborhoods and adjacent to preserved natural open space. Lighting,

including all landscape low voltage decorative lighting, shall comply with the County's light pollution code.

3.4 Conclusions

As discussed in subchapter 3.2.3 above, several locations around the perimeter of the project would subject the adjacent agricultural operations to significant indirect (compatibility) impacts, including AAs 3 through 10 and 13. Mitigation Measure 2~~1~~, in the form of a 50-foot-wide agricultural compatibility buffer planted with two rows of orchard trees would reduce edge effects that could cause adjacent agricultural operations to cease; thus reducing significant indirect impacts to less than significant. This mitigation measure is placed ~~located~~ where residential uses in Lilac Hills Ranch would abut existing adjacent orchards and will be used to create a transition and buffer between the two uses. Specifically, as discussed in the preceding sections, the buffer would be incorporated at locations AAs 3 through 10 and 13. AA 9 would only be planted with 1 row of staggered trees; however, due to the increased width of separation resulting from the improvement of Covey Lane, this would provide adequate mitigation. Mitigation Measure 3~~2~~ requiring a 6-foot-high masonry fence to be constructed and maintained would ~~to~~ protect off-site agricultural uses from intrusions from the proposed project at locations AAs-3 through 10 and 13. Mitigation Measure 4~~3~~ requiring restrictions placed within the ~~FMZ~~LBZs prohibiting all structures or features that could attract residents or children, would be incorporated at AAs 3, 4, 6 through 10, and 13.

Mitigation Measure 5~~4~~ for interim phasing is also provided in order to ensure that urban/agricultural compatibility conflicts internal to the project site are less than significant during the phased implementation of the project.

PDCs in the form of disclosure statements to be included in the sales documentation when a lot is sold would be implemented. The disclosure statements would identify the location of the subject residence relative to the off-site agricultural operations and would notify the prospective owner that the property may be used for activities which may generate concerns such as noise, odors, agricultural traffic, and vectors. Inclusion of these disclosure statements would also provide conformance with the San Diego County Agricultural Enterprises and Consumer Information Ordinance. New nighttime lighting proposed by the project would be required to be shielded and directed away from the off-site parcels. ~~and~~ ~~FMZ~~LBZ are proposed around the perimeter of the project site. These PDCs, in combination with the mitigation measures described above, would reduce ~~ensure that~~ nuisance complaints that could result in cessation of adjacent agricultural operations to a level of remains less than significant.

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4.0 Conformance with Agricultural Policies

4.1 Applicable General Plan and Community Plan Policies

4.1.1 General Plan Policies

The following is a list of General Plan and Community Plan policies related to agriculture. A consistency analysis is discussed in subchapter 4.2 below.

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.*

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

~~*LU-7.2 Parcel Size Reduction as Incentive for Agriculture. Allow for reductions in lot size for compatible development when tracts of existing historically agricultural land are preserved in conservation easements for continued agricultural use.*~~

COS 6 *Sustainable Agricultural Industry. A viable and long-term agricultural industry and sustainable agricultural 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.*

COS 6.1 *Economic Diversity. Support the economic competitiveness of agriculture and encourage the diversification of potential sources of farm income, including value added products, agricultural tourism, roadside stands, organic farming, and farmers markets.*

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 includes 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.*

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.*

COS 6.4 *Conservation Easements. Support the acquisition or voluntary dedication of agriculture conservation easements and programs that preserve agricultural lands. In addition to their economic value, agricultural lands provide the added benefit of serving as habitat areas for sensitive animal species.*

COS 6.5 *Best Management Practices. Encourage best management practices in agriculture and animal operations to protect watersheds, reduce GHG emissions, conserve energy and water, and utilize alternative energy source, including wind and solar power.*

4.1.2 Valley Center Community Plan Policies

Goal: *Preserve and enhance existing and future agricultural uses in the Valley Center Community Plan.*

Policy 1: *Support agricultural uses and activities through the community plan area by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center.*

Policy 2: *Encourage the formation of Agricultural Preserves in areas with active agricultural operations and in locations that will be optimal for future agricultural production.*

Policy 4: *Prohibit residential development which would have an adverse impact on existing agricultural uses.*

4.1.3 Bonsall Community Plan

Policy P LU-1.1.2: *Maintain the existing rural lifestyle by continuing the existing pattern of residential, equestrian, and agricultural uses within the Bonsall CPA.*

Policy LU-4.1.7 *Discourage incompatible land uses on areas of agricultural use and land suitable for agricultural usage.*

Goal COS-1.2 *The continuation of agriculture as a prominent use throughout the Bonsall community.*

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.*

4.2 Project Consistency with Applicable Policies

4.2.1 General Plan Policies

The following provides an analysis of the project's consistency with General Plan and Community Plan policies related to agriculture.

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.*

~~The project includes as one of its primary objectives: Recognize the existing rural atmosphere of the surrounding area through use of agriculture on-site and provision of transitional types of residences. While t~~

The project incorporates mitigation measures and project design features to assure the protection of agricultural operations. As discussed in subchapter 2.3 above, on-site prime and statewide importance soils that would be converted during the development of the project would be mitigated through the purchase of agricultural conservation easements. Specifically, a 1:1 mitigation ratio would be required for impacts to the soils that meet the criteria for Prime Farmland or Farmland of Statewide Importance and which are "available for agriculture." Additionally, 42.2 acres of agricultural buffers and agricultural open space are included as part of the project design, and on-going agricultural cultivation would be allowed to continue in these areas.

~~he project would convert existing agricultural operations to non-agricultural uses (pursuant to subchapter 2.3 above), the LARA Model analysis concludes that the project site is not a significant agricultural resource. Further, the Specific Plan includes agriculture as an allowed use within much of the project site including common open space areas and manufactured slopes. HOA-maintained agricultural open space would be retained on the project site, including groves of orchard trees, such as avocado and citrus.~~

Other agricultural-related commercial uses may be established by the project within the C34 zoned areas and would include such uses as farmers' markets and wineries. Accessory structures associated with agricultural operations, such as storage sheds or commercial stands, would be regulated through zoning established within the Specific Plan for the project.

The project also protects off-site agricultural operations. ~~In addition, a~~As discussed in subchapter 3.2.3 above, the project would include Mitigation Measures ~~1, 2, and 3~~2, 3, and 4, which would ensure that urban/agriculture compatibility conflicts are less than significant.

Therefore, the project would be consistent with LU-6.4. ~~inasmuch as it attempts to "protect agricultural operations including grazing."~~

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.

The project site is located in an area of agricultural and rural residential uses. As discussed for Policy 6.4 above, the project incorporates mitigation measures and project design features to assure the protection of agricultural operations. Specifically, on-site prime and statewide importance soils that would be converted to non-agricultural uses would be mitigated through the purchase of agricultural conservation easements at a 1:1 ratio. Additionally, 42.2 acres of agricultural buffers and agricultural open space are included as part of the project design, and ongoing agricultural cultivation would be allowed to continue in these areas. As discussed in subchapter 3.2.3 above, the project would include on-site biological open space, common open space, LBZ buffers, as well as Mitigation Measures 2, 3, and 4, which would ensure that urban/agriculture compatibility conflicts are less than significant.

~~The LARA Model analysis used to assess the potential impact on agriculture concludes that the site is not an important agricultural resource. *The site received a low rating for soil quality and a high rating for climate and water resources." These three criteria are Required Factors, pursuant to the LARA Model, and a rating of low for any one* Required Factor automatically identifies the project site as not an important agricultural resource.~~

Further, by concentrating new housing in a compact form of development that is within a planned village setting, accessible to infrastructure and transportation; development pressure on areas that contain farmland of agricultural importance would be reduced and would not, in turn, encourage such existing agricultural uses from being developed. ~~Accordingly, the project is consistent with LU-7 and no impacts would occur.~~

~~As discussed in subchapter 3.2.3 above, the project would include on-site biological open space, common open space, FMZ buffers, as well as Mitigation Measure 1, 2, and 3, which would ensure that urban/agriculture compatibility conflicts are less than significant.~~ Therefore, the project would be consistent with Goal LU-7 relative to retaining and protecting farming and agriculture as beneficial resources that contribute to the County's rural character.

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

As part of the project, the General Plan Regional Land Use Map is proposed to be amended to remove the existing regional category and land use designation and to re-designate the entire 608-acre site as 'Village'. The project also proposes a General Plan Amendment to

change the Valley Center and Bonsall Community Plan land use designations to Village Residential (VR 2.9) and Village Core (C-5). ~~As presented in Chapter 2.0 above, pursuant to the LARA model analysis, the project site is not a significant agricultural resource. Further, t~~The Specific Plan includes agriculture as an allowed use within much of the project site including common open space areas and manufactured slopes. HOA-maintained agricultural open space would be permitted, including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may be established by the project within the C34 zoned areas and would include such uses as farmers markets and wineries.

The project would support continued agricultural operations through the purchase of agricultural conservation easements that would permanently protect agricultural land of prime and statewide importance soils at a 1:1 ratio.

~~The project includes urban land uses and densities that are not consistent with the existing General Plan Regional Category of Semi-Rural Lands or the General Plan Land Use Designations of Semi-Rural Residential SR-4 and SR-10 for the project site. However, as discussed above for LU-7, by concentrating new housing on farmland concluded to be not a significant resource by the LARA model in a planned village setting that is accessible to infrastructure and transportation; development pressure on areas that do contain significant agricultural resources would be reduced.~~ Further, the project would include on-site biological open space, common open space, and ~~FMZ~~LBZ, as well Mitigation Measures ~~1, 2, and 3~~2, 3, and 4, in order to ensure that urban/agriculture compatibility conflicts are less than significant. Accordingly, ~~no in~~ the project is ~~consistency~~ consistent ~~would occur pursuant to~~with LU-7.1.

~~*LU-7.2 Parcel Size Reduction as Incentive for Agriculture. Allow for reductions in lot size for compatible development when tracts of existing historically agricultural land are preserved in conservation easements for continued agricultural use.*~~

~~The project would not preserve agriculture in conservation easements because the agricultural soils on-site are not categorized as high quality and the loss of the agricultural opportunities would not be significant. However, implementation of the project would retain 38.5 acres of on-site agriculture which is comprised of existing agriculture. The Specific Plan includes agriculture within the project site including common open space areas, biological open space, and manufactured slopes. HOA-maintained agricultural open space would be retained along many of the boundaries of the project site, as agricultural compatibilities buffers including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may be established. These methods would allow for the continuation of some on-site agriculture.~~

COS 6 *Sustainable Agricultural Industry. A viable and long-term agricultural industry and sustainable agricultural 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.*

~~This is a Countywide Policy. However, as presented in Chapter 2.0 above, pursuant to the LARA Model analysis, the project site is not a significant agricultural resource because one the three primary factors (soil quality) was rated "low". The project will accommodate growth on agricultural land of low quality and importance; thereby, reducing pressure on the conversion of agricultural lands more economically sustainable for long-term agricultural production.~~ To reduce urban/agricultural compatibility conflicts, the project would include on-site biological open space, common open space, and ~~FMZ~~LBZ as well as Mitigation Measure ~~1, 2, and 3~~2, 3, and 4. These mitigation measures help to ensure that existing and future agricultural operations occurring adjacent to the project site would be sustainable. Mitigation Measure 5 would ensure that on-site agricultural operations could continue without causing compatibility impacts while the project is phased in over time. Therefore, the project would not conflict with this policy.

COS 6.1 *Economic Diversity. Support the economic competitiveness of agriculture and encourage the diversification of potential sources of farm income, including value added products, agricultural tourism, roadside stands, organic farming, and farmers markets.*

The project would encourage ongoing agricultural opportunities. The project Town Center is specifically intended to support a farmers' market, specialty boutiques with value added products, such as homemade jams, and small wineries. The project residents would be able to patronize and support the competitiveness of these rural agricultural venues. As a result of the San Diego County Agricultural Enterprises and Consumer Information Ordinance, the Conditions, Covenants, and Restrictions (CC&R) for the project would require new residents to recognize and acknowledge the existence of agriculture in surrounding areas, limiting their ability to file nuisance complaints and other actions to limit existing agricultural operations. The site plan has been designed to, where feasible, locate open space or larger, ranchette-style lots where proposed on-site residences would be adjacent to existing agricultural operations, and could compatibly engage in hobby farming. ~~This is a policy that is intended to be implemented by the County on a regionwide basis. The project is currently located in an area surrounded by existing residential and commercial uses. The project will accommodate growth on agricultural land of low quality and importance, thereby reducing pressure on the conversion of agricultural lands more economically sustainable for long term agricultural production. In addition, the Specific Plan reserves a location (private parkland) where farmer's markets will be encouraged within the Village Center (see Figure 3).~~

To reduce urban/agricultural compatibility conflicts, the project would include on-site biological open space, common open space, and LBZ, as well as Mitigation Measures 2, and 3, and 4. These mitigation measures help to ensure that existing and future agricultural operations occurring adjacent to the project site would be sustainable. The project would be consistent with COS 6.1.

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 includes 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.*

As discussed throughout, Tthe project includes Mitigation Measures 21 through 43 and PDCs aimed to reduce edge effects that could cause adjacent agricultural operations to cease. In addition to the required disclosure statements (pursuant to the Agricultural Enterprises and Consumer Information Ordinance), a residents' education program will be undertaken to ensure that new residents understand and appreciate the role agriculture plays in maintaining the rural village atmosphere. CC&Rs will require new residents to recognize and acknowledge the existence of agriculture in surrounding areas, limiting their ability lodge nuisance complaints. The Specific Plan has been designed to locate open space or large lots adjacent to existing agricultural operations and to incorporate on-site agricultural uses into the common and landscaped areas where feasible. Where necessary, buffers are provided between homes and the agricultural operation (see subchapter 3.3 above). Accordingly, no inconsistencies would occur relative to COS 6.2.

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.

As discussed above for policy COS 6.2, the Specific Plan has been designed to locate open space or large lots adjacent to existing agricultural operations and to incorporate on-site agricultural uses, such as orchards, into the common and landscaped areas where feasible. As discussed in subchapter 3.2.3 above, ~~FMZ~~LBZ, open space or biological open space buffers are provided between homes and the agricultural operation or prescribed by the project's mitigation measures. In addition, a large public park (~~12.0~~13.5 acres) has been sited in the southeastern portion of Phase 3 where it serves to buffer development from the adjacent orchards. Accordingly, no inconsistencies would occur relative to COS 6.2.

COS 6.4 Conservation Easements. Support the acquisition or voluntary dedication of agriculture conservation easements and programs that preserve agricultural lands. In addition to their economic value, agricultural lands provide the added benefit of serving as habitat areas for sensitive animal species.

~~This is a policy that is intended to be implemented by the County on a county-wide basis. While t~~The Specific Plan would allow certain agricultural elements and activities (e.g., small groves and farmer's markets); and the land use plan includes 42.2 acres of agricultural buffers and agricultural open space. ~~no conservation easements are proposed, and the land use plan does not include any preserved agricultural acreage.~~ The Specific Plan has also been designed to, where feasible, locate open space or large lots adjacent to existing agricultural operations and to incorporate on-site agricultural uses into the common and landscaped areas where feasible. Further, project Mitigation Measure 1 includes requirements for the applicant to provide 43.8 acres of agricultural conservation easements, purchase 43.8 credits from the County's PACE program, or the equivalent. Accordingly, no inconsistencies would occur relative to COS 6.4.

COS 6.5 Best Management Practices. Encourage best management practices in agriculture and animal operations to protect watersheds, reduce GHG emissions, conserve energy and water, and utilize alternative energy source, including wind and solar power.

The project does not encompass or allow agricultural activities as a primary use. However, the Specific Plan would allow limited agricultural uses such as a farmer's market within the private park and groves (as feasible) within some of the common open space and manufactured slope areas. Several existing agricultural areas would be retained within certain portions of the biological open space and the agricultural compatibility buffers to provide transition and compatibility. To the extent that on-site (not-for-profit) agricultural activities would occur within the project site, the HOA would maintain these areas and/or

enforce applicable BMPs in the form of CC&Rs. The project would not conflict with Policy 6.5.

S 11.5 *Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.*

As discussed in preceding subchapter 3.2.3, the project incorporates mitigation measures 2~~1~~ through 4~~3~~, requiring agricultural buffers along the project boundaries adjacent to off-site agriculture as well as use limitation zones, and fencing in order to ensure that there would be adequate safe distances between the on-site residents and off-site areas using pesticides or other hazardous materials. In addition, subchapter 1.4.2.3(b) discusses state pesticide regulations which prohibit discharging pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. There are also regulations and label requirements that prevent or minimize "drift" during aerial applications. The project nevertheless implements a minimum of 50 foot buffers anywhere along the project boundary that have been historically adjacent to fields that were sprayed aerially; and the school site design incorporates a 325-foot buffer between the edge of the school lot and the nearest agricultural operation. The project would not conflict with Safety Element Policy S 11.5.

4.2.2 Valley Center Community Plan Policies

Goal: *Preserve and enhance existing and future agricultural uses in the Valley Center Community Plan.*

~~The project includes as one of its primary objectives: Recognize the existing rural atmosphere of the surrounding area through use of agriculture on-site and provision of transitional types of residences.~~

The Specific Plan includes agriculture throughout the project site including common open space areas, biological open space, and manufactured slopes. HOA-maintained agricultural open space would be retained along many of the boundaries of the project site, as agricultural compatibilities buffers including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may be established by the project, as allowed within the C34 zoned areas. Accessory structures associated with agricultural operations, such as storage sheds or commercial stands, would be regulated through zoning established within the Specific Plan for the project. In addition, as discussed in subchapter 3.2.3 above, the project would include Mitigation Measures and PDCs, which would ensure that urban/agriculture compatibility conflicts are less than significant. Lastly, the applicant would be required (via Mitigation Measure 1) to provide 43.8 acres of

agricultural conservation easements, purchase 43.8 credits from the County's PACE program, or the equivalent.

Policy 1: Support agricultural uses and activities through the community plan area by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center.

The project would support and complement the rural lifestyle in Valley Center via the Specific Plan, which supports the continuation of on-site agriculture throughout the project site including common open space areas, biological open space, and manufactured slopes. HOA-maintained agricultural open space would be retained along many of the project boundaries, as agricultural compatibility buffers including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may be established within the C34 zoned areas as allowed within the zone.

Implementation of the project would rezone the project site from zoned A-70 (Valley Center) and RR (Bonsall) with the (RU) Urban Residential Use Regulation (outside the Town Center and the two Neighborhood Centers) and (C34) General Commercial–Residential Use Regulation within the Town and Neighborhood Centers. The project would become a self-contained village that includes trails, equestrian opportunities, retained agriculture (as described above), preserved sensitive habitat and defined neighborhood with architecturally appealing concepts. The new development would not discourage the continuation of the rural character of Valley Center. Accordingly, no inconsistency would occur pursuant to this policy.

Policy 2: Encourage the formation of Agricultural Preserves in areas with active agricultural operations and in locations that will be optimal for future agricultural production.

This is a policy that is intended to be implemented by the County on a Countywide basis. As described in subchapter 1.4.2.6 of this report, there are no Williamson Act Contracts or Agricultural Preserves within the project site. Agricultural Preserve #88 is located directly adjacent to the southeast project boundary; however, pursuant to the GPU, non-contracted lands within the adopted Agricultural Preserves are to be removed and the "A" designator would be removed from the lands. As discussed above, the applicant would preserve land within the County for agricultural purposes in perpetuity through the purchase of 43.8 acres of conservation easements or equivalent PACE program credits. ~~Because the LARA model analysis concluded that the site is not a significant resource, the project is not required to provide conservation easements, preserves, etc.~~ No conflicts would result.

Policy 4: Prohibit residential development which would have an adverse impact on existing agricultural uses.

The project includes a number of Mitigation Measures and PDCs to ensure that effects on adjacent agricultural operations are minimized, including the required disclosure statements

(pursuant to the Agricultural Enterprises and Consumer Information Ordinance), a residents' education program undertaken to ensure that new residents understand and appreciate the role agriculture plays in maintaining the rural village atmosphere, and CC&Rs, which require new residents to recognize and acknowledge the existence of agriculture in surrounding areas, limiting their ability lodge nuisance complaints.

Specifically, the project would include on-site open space, and ~~FMZ~~LBZ, as well as require the implementation of Mitigation Measure ~~1, 2, and 3~~2, 3, and 4, and PDCs which would ensure that urban/agriculture compatibility conflicts are less than significant. Therefore, the project would be consistent with Policy 4.

Policy 6: *Encourage activities to increase public awareness of and enrollment in the Department of Agriculture program pursuant to the Agricultural Enterprises and Consumer Information Ordinance. (This Ordinance was designed to protect established farm operations from being declared a nuisance when following accepted agricultural practices.)*

The project includes a PDC in the form of required disclosure statements to be included in the sales documentation when a lot is sold. The disclosure statements would identify the location of the subject residence relative to the off-site agricultural operations and would notify the prospective owner that the property may be used for activities which may generate concerns such as noise, odors, agricultural traffic, and vectors. Inclusion of these disclosure statements would also provide conformance with the San Diego County Agricultural Enterprises and Consumer Information Ordinance.

Public Safety, Services, and Facilities Policy 2:

The Specific Plan shall include language which provides a process to inform future residences of the adjacent agricultural uses and that the "right to farm" legislation prohibits future land use protests.

As discussed above for Policy 6, PDCs would be required for all proposed lots which would take the form of disclosure statements to be included in the sales documentation when a lot is sold. Inclusion of these disclosure statements would inform future residents of the San Diego County Agricultural Enterprises and Consumer Information Ordinance.

4.2.3 Bonsall Community Plan

Policy P LU-1.1.2: Maintain the existing rural lifestyle by continuing the existing pattern of residential, equestrian, and agricultural uses within the Bonsall CPA.

The Bonsall Community Plan area covers over 32 square miles. Land uses include residential area with densities ranging from 1 unit per 40 acres to 15 units per acre. The portion of the project site~~,~~ which is within the Bonsall Community Plan is zoned RR (Rural Residential). A provision has been made within the project design to buffer existing agricultural uses with implementation of Mitigation Measures ~~1, 2, and 3~~2, 3, and 4. Residents of the project will also be educated about the importance of agriculture in the surrounding area.

Policy LU-4.1.7 Discourage incompatible land uses on areas of agricultural use and land suitable for agricultural usage.

As discussed in subchapter 3.2.3 above, the project would include on-site open space and ~~FMZ~~LBZ, as well as Mitigation Measures ~~1, 2, and 3~~2, 3, and 4, and PDCs that require disclosure statements, which would ensure that urban/agriculture compatibility conflicts are less than significant. Further, the portion of the project site which is within the Bonsall Community Plan is zoned RR (Rural Residential). The project would not result in an inconsistency with this policy.

Goal COS-1.2 The continuation of agriculture as a prominent use throughout the Bonsall community.

The Specific Plan provides a village located partially within the Bonsall Community Plan area. The project would retain agriculture on-site both within the biological buffers and throughout the perimeter of the project site, to allow ongoing cultivation of orchard fruits. Agriculture will continue to be a prominent characteristic throughout the project and supported by the HOA. A farmers' market may also be included in the operation of the proposed project, at a future date. By concentrating new housing in a compact form of development, within a planned village setting, the development will be located in an area more suitable for growth and will reduce the pressure on areas that contain farmland. Further, the portion of the project site, which is within the Bonsall Community Plan, is zoned RR (Rural Residential). Lastly, the applicant would preserve land within the County for agricultural purposes in perpetuity through the purchase of 43.8 acres of conservation easements or equivalent PACE program credits. Therefore, the project would not significantly impact the continuation of agriculture in Bonsall and no inconsistency would occur relative to COS 1.2.

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.

~~While, no agricultural easements are proposed and the project is not participating in the Conservation Subdivision Program,~~ The Specific Plan would allow agricultural activities (e.g., small groves and farmer's markets). Additionally, the Specific Plan has been designed to locate open space or large lots adjacent to existing agricultural operations and to incorporate on-site agricultural uses into the common and landscaped areas to maintain a rural character. Further, where there are proposed residential uses abutting off-site orchard operations, Mitigation Measures ~~1, 2, and 3~~2, 3, and 4, would be implemented to provide a transition between the two uses. Additionally, as discussed above, the applicant would preserve agricultural land in perpetuity through the purchase of 43.8 acres of conservation easements or equivalent PACE program credits within the County.

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.

The project includes a number of PDCs to ensure that effects on adjacent agricultural operations are minimized. Where necessary, agricultural buffers are provided throughout the project's adjacent agricultural operation areas, (see subchapter 3.2.3 and Mitigation Measures and PDCs listed in subchapter 3.3). A residents' education program will be undertaken to ensure that new residents understand and appreciate the role agriculture plays in maintaining the rural village atmosphere. Finally, this report includes a PDC in the form of disclosure statements to prospective homebuyers that prohibit existing agricultural operations from being declared a nuisance. Accordingly, no inconsistency would occur relative to COS 1.2.3.

4.3 Conclusions

As discussed in subchapter 4.2 above, the project would be consistent with applicable General Plan, and Valley Center and Bonsall community plan policies.

5.0 Cumulative Impacts

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

5.1 Guidelines for the Determination of Significance

The Guidelines for Determining the significance of cumulative impacts are based on the same Guidelines used to determine the significance of direct and indirect impacts, with the exception that the analysis considers the significance of the cumulative impact of the individual project impact in combination with the impacts caused, by the projects in the cumulative study area that would also impact important agricultural resources.

While agriculture is a regional commodity, California Environmental Quality Act (CEQA) requires the selection of a cumulative project area that allows a meaningful analysis of potential impact and too large of an assessment area could make it impossible to identify the project's potential incremental effects. The cumulative project area selected for agricultural resources is shown in Figure ~~X~~17. This localized area~~,~~ of approximately 1 mile, is comprised of those past, present, and probably future projects that share similar agricultural characteristics such as plant climate zone, topography, and water resources.

5.2 Analysis of Project Effects

Addressing cumulative impacts to agricultural resources requires an analysis using one of the methods identified in CEQA §15130(b)(1). If the list of projects method is used, a reasonable list of cumulative projects must be compiled based on past, present, and probable future projects that could also cumulatively contribute to the project's impacts. The summary of projections approach to completing a cumulative analysis is not currently available due to the lack of a recent local planning document or EIR that describes and evaluates regional or area wide conditions contributing to a potential cumulative agricultural impact.

~~The climate and topography on the project site make it 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 the cumulative project area. Pursuant to the County's Guidelines, both a qualitative and quantitative discussion are included.~~

The following analysis relies upon both a recent local planning document (the GPU EIR) and an assessment of potential cumulative impacts based on the "List of Projects Method" identified in the CEQA Guidelines. The loss of important farmland is analyzed based on the list of projects within the cumulative study area and Countywide while agricultural production utilizes a Countywide comparison, in its analysis.

A list of projects with a summary of project features and agricultural resources is provided in Table 9~~7~~. The cumulative agricultural effects of the project were evaluated, based on Table 9~~7~~ and Figure 17.

5.2.1 Cumulative Impacts to Important Farmland

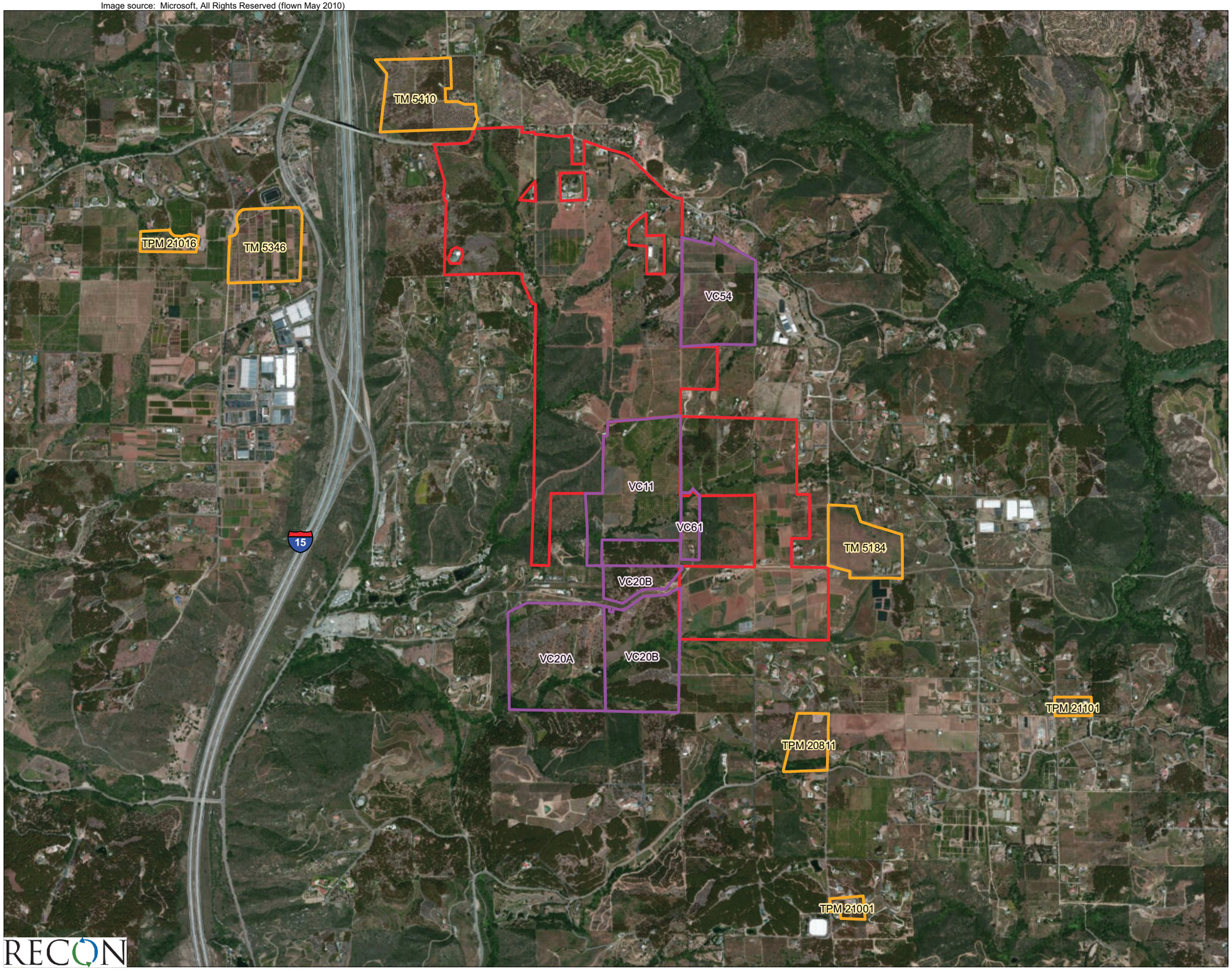
As discussed in the GPU EIR, agricultural acreage within the County has been in decline, since at least 1984, due to pressures on agriculture such as high land values, urban/agricultural interface conflicts, and high economic costs (water costs). While the types of farming occurring in San Diego (small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

~~Section 4.2.4 of the County's Guidelines states:~~

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

~~Accordingly, and~~ As discussed in the previous sections, the project ~~**is**~~ not an important agricultural resource, pursuant to the LARA Model (Guideline 4.2.1); Impacts would be reduced to below a significant level through Mitigation Measures 1 through 4 and the PDCs listed in subchapter 3.3 with respect to indirect impacts (Guidelines 4.2.3); and would not conflict with a school, agricultural zoning, or a Williamson Act Contract (Guideline 4.2.2). Therefore, the project would not contribute to a cumulative impact.

Image source: Microsoft, All Rights Reserved (flown May 2010)



Project Boundary
Cumulative Project
Project Specific Request

0 Feet 1,700

RECON

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FIGURE 17
Cumulative Projects

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TABLE 9~~7~~
CUMULATIVE PROJECTS EVALUATION[1]

Project	Project Description	Important Agricultural Resources	Impacts
SUKUP PRD TM5184	A tentative map for 9 lots on 24.62 acres, including open space easements and a limited building zone.	Includes 30.1 acres of Farmland of Local Importance (fallow) and 1.4 acre of Unique Farmland.	Assumed to impact all 31.5 acres of Unique and Locally Important Farmland.
DABBS TM 5346	Request for Tentative Map on 38.4 acres. The site is located on the west of Old Highway 395, east of Aqueduct Road, north of Via Urner Way.	Contains 38.2 acres of flower/row crops; 37.9 acres of Unique Farmland, 0.16 acre of Other, and 0.13 acre of Prime Farmland.	It is assumed that all 38.2 acres of flower and row crops are impacted as well as 37.9 acres of Unique Farmland.
MUSTAFA TPM 20811	A tentative parcel map for a minor subdivision of 4 lots and a remainder parcel on 16.4 acres.	Disturbed with existing residential uses; but is mapped as 12.5 acres of Unique Farmland and 3.9 acres of Farmland of Local Importance.	No agricultural production would be affected, but 12.5 acres of Unique Farmland and 3.9 acres of Farmland of Local Importance would be converted.
GOODNIGHT RANCHOS, TPM 21001	Minor residential subdivision within the Valley Center Community Plan area. The project would divide 5.0 acres into 2 parcels measuring 2.45 acres net each.	Contains approximately 5 acres of orchards, comprised of 1.1 acre of Farmland of Statewide Importance and 3.9 acres of Unique Farmland.	Assumed to impact all 5 acres of orchard production as well as Unique and Statewide Important Farmland.
PFAFF TPM 21016	TPM to divide a 7.79-acre parcel into three residential lots. The site contains an existing single-family residence on proposed Parcel 1 that would be retained.	Disturbed with existing residential uses; but is mapped as 8.1 acres of Unique Farmland.	No agricultural production would be affected, but it is assumed that all 8.1 acres of Unique Farmland would be converted.
GANGAVALLI~~T~~ PM 21101	Residential Tentative Parcel Map. The project proposes to divide 5.05 acres into 2 parcels.	Contains approximately 5 acres of orchards, comprised of 0.22 acre of Other and 4.83 acres of Unique Farmland.	Assumed to impact all 5 acres of orchard production as well as Other and Unique Farmland.
MARQUART RANCH TM 5410	9 SFR lots. Includes improvements to West Lilac Road and Mesa Lilac Road.	Contains 41 acres of orchards on Unique Farmland	Case assumes conversion of all 41 acres of orchards and Unique Farmland.
VC11	This PSR located within the sawtooth shape formed along the southern boundary of Phase 3.	Contains 3.3 acres of Farmland of Local Importance; 10 acres of Other Land; and 66 acres of Unique Farmland (orchards).	Any assumptions about PSRs would be speculative. The worst case scenario of complete conversion to non-agricultural uses is assumed.
VC20B	A PSR located adjacent to the western boundary of Phase 5 (AA 11)	Includes 2 acres of Farmland of Local Importance and 76 acres of Unique Farmland (orchards).	Complete conversion is assumed.
VC20A	This PSR is located immediately west of VC20B	Includes 16 acres of Farmland of Local Importance; 2 acres of Other Land and 59 acres of Unique Farmland (orchards).	Complete conversion is assumed.
VC61	A small PSR located within a gap between Phases 4 and 5.	Contains 5.7 acres of Farmland of Local Importance (estate residential) and 3.8 acres of Unique Farmland (orchards).	Complete conversion is assumed.
VC54	This PSR is located along the eastern portion of Phase 3 and adjacent to AA 7	Includes 1 acre of Farmland of Local Importance; 3 acres of Farmland of Statewide Importance; and 51 acres of Unique Farmland (flower/nursery crops).	Complete conversion of existing flower/nursery uses is assumed.

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

~~Nevertheless, the project is located, within an agricultural community and a quantitative discussion is also warranted.~~ As shown in Table 10~~8~~, the twelve cumulative projects (including five PSRs) together contain ~~444.5~~431.9 acres of Important Farmland (not including "Other Land" which is a catch-all category that the FMMP does not consider to be Important Farmland), and combined with the project (see Table 7) results in a total of ~~1052~~ 943.5 acres of potential impacts to Important Farmland within the cumulative study area. The project's impacts to Important Farmland (Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance) totals 511.7 (again excluding "Other Land") acres, representing 54 percent of the cumulative total of Important Farmland. With respect to the regional cumulative study area; there is a total of ~~3,557~~5,627 acres of important farmland (or 3,557 if excluding Other Land); and the project's impacts would represent conversion of ~~14~~ 11 percent of the study area ~~total~~total (or 14 percent if excluding Other Land). ~~Overall, the project's impacts to Important Farmland represent 54 percent of the cumulative total, or 11 percent of the Study area total~~

~~.~~ In light of these percentages, the fact that the site is considered an important agricultural resource pursuant to the LARA Model, and the project's direct impact to 43.8 acres of soils that meet the quality criteria for Prime Farmland or Farmland of Statewide Importance; ~~Thus, while the loss of Important Farmland is cumulatively considerable,~~ the project's incremental contribution to a significant cumulative ~~this~~ impact ~~is~~ would ~~less than~~ also be significant.

TABLE 10~~8~~
ACRES OF FMMP FARMLAND WITHIN THE CUMULATIVE PROJECT AREA

Category	Project Acres	Cumulative Projects	Total Cumulative	Regional Cumulative Study Area Total ~~in 2008~~	County-Wide
Other Land*	95.9	12.6	108.5	2,070	1,452,699
Farmland of Local Importance	146.3	62.1	**208.4**	1,124	153,187
Prime Farmland	0.0	0.1	**0.1**	24	7,753
Unique	329.2	365.5	**694.7**	2,305	51,975
Farmland of Statewide Importance	36.2	4.2	**40.4**	104	10,411
TOTAL	607.6	444.5	**1,052**	5,627	1,676,025

*Note that Other Land is not considered by the CDC to be "farmland" as it is generally a catch-all category for those lands that don't fit into any other category.

~~5.2.2 Cumulative Impacts to Agricultural Production~~

~~Fruit and nut crops, of which avocados and citrus comprise 86 percent, are 16 percent of the total value produced by agriculture in the County (avocados by themselves are 9 percent) and 12 percent (36,239 acres) of the total acreage. Approximately 33,420 acres of citrus and avocado crops were grown in San Diego County in 2010, representing a~~

~~14 percent decrease (4,813 acres) in acreage grown compared to 2009 (County of San Diego 2010). Currently, approximately 292 acres (48 percent) of the project site are used for citrus and avocado production. The conversion of this acreage would represent 56 percent of the total when considered with the 12 identified cumulative projects (see Table 7. Compared to the study area's 3,557 acres of avocado/citrus production, the project's 292 acres of impacts would represent an 8.2 percent conversion.~~

~~The project includes 104.1 acres of biological open space and an additional 38.7 acres of agricultural open space where orchards would be an allowed use. Likewise, a 50 foot width of open space and two rows of orchard trees would be mandatory along certain portions of the project boundary (see subchapter 3.2.3). Planting citrus and avocado trees on the manufactured slopes is planned as part of the project because it would help to retain the rural agricultural character. Further, community gardens would be an allowed use and a farmers' market would be an allowed use within the Town Center in Phase 2. With these considerations, the project's incremental contribution to agricultural production impacts would, therefore, be less than significant.~~

5.2.24 Cumulative Impacts to Williamson Act Contract Lands

~~All of the cumulative projects lie within the one mile buffer where Williamson Act contract lands and agricultural preserve lands have been mapped (see Figure 13).~~ None of the projects in the cumulative study area are identified as having direct project impacts to ~~conflicts with~~ a Williamson Act Contract or as being located ~~lie~~ within an agricultural preserve. As ~~; nor would the project have any associated impacts. Additionally, as~~ discussed in subchapter 3.2.1 above, the project includes several mitigation measures and planning design considerations to ensure that the project would have a less than significant impact with respect to land use conflicts; these same measures would ensure that the project's incremental contribution toward a cumulative impact would be less than significant. ~~as part of the zoning amendments required by the adoption of the General Plan, the non-contracted lands, within the adopted Agricultural Preserves, will remove the "A" Designator from these lands. This means that those lands are Agricultural Preserves, but not Williamson Act Contracted Lands. The project includes a number of mitigation measures and PDCs to ensure that effects on adjacent agricultural operations are minimized. Where necessary, Mitigation Measure 23 requires agricultural buffers adjacent to off-site agricultural operation areas (see subchapter 3.2.3 and Mitigation Measures and PDCs listed in subchapter 3.3). A residents' education program will be undertaken to ensure that new residents understand and appreciate the role agriculture plays in maintaining the rural village atmosphere. Finally, this report includes a PDC (PDC-1) in the form of disclosure statements to prospective homebuyers that prohibit existing agricultural operations from being declared a nuisance.~~ Therefore, the cumulative impact to Williamson Act Contract lands and agricultural preserves would be less than significant.

5.2.3 Cumulative Urban/Agriculture Interface Impacts

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. As discussed in subchapter 3.2.3 above, the indirect impacts associated with this project would be significant at identified AA areas. These impacts ~~are~~ would be reduced to less than significant with the implementation of the Mitigation Measures 2~~1~~ ~~through 4~~and 3~~3~~ and the PDCs proposed for this project. The cumulative projects having similar indirect impacts as the ~~would~~project would be required by the County to implement similar mitigation and PDCs to reduce their own urban/agriculture interface impacts. Thus, each cumulative project would mitigate their own incremental contribution toward a cumulative impact and project impacts, even when considered in conjunction with the cumulative projects identified in Table 9~~7~~, would be less than significant.

5.3 Mitigation Measures and Design Considerations

The project's incremental contribution to a cumulatively considerable impact includes conversion of the 43.8 acres of Prime and Statewide Significance soils as described in subchapter 2.3. Implementation of Mitigation Measure 1 for direct impacts would serve to reduce the project's incremental contribution to this cumulative impact to a level that is less than significant.

Likewise, implementation of Mitigation Measure 2 and 3 and the PDCs proposed would reduce direct impacts, and with each cumulative project being required by the County to reduce their own direct impacts through similar measures, no significant cumulative impacts were identified to Williamson Act Contract lands or with respect to cumulative Urban/Agricultural Interface or Land Use Compatibility impacts; thus, no mitigation would be required. ~~No impacts are identified and no mitigation is required.~~

5.4 Conclusions

As discussed in subchapter 5.2.1 above, the project would, through the direct conversion of 43.8 acres of soils of Prime and Statewide Importance, contribute to a cumulatively considerable impact. The project would be required to implement Mitigation Measure 1 to reduce both direct and cumulative impacts to below a level of significance. ~~As discussed above, n~~No significant cumulative impacts would result from the project in association with Williamson Act Contracted lands or due to urban/agriculture interface conflicts. ~~Nor would~~

~~the project have a significant direct impact pursuant to the LARA Model. Indirect impacts could be potentially significant, but would be reduced to less than significant through implementation of mitigation measures and PDCs discussed in subchapters 3.2 and 3.3.~~ Additionally, the project includes several mitigation measures and PDCs (Mitigation Measures 2 through 5 and PDCs 1 through 3, as discussed in subchapters 3.2 and 3.3) to ensure that the project would have a less than significant impact with respect to land use conflicts; these same measures would ensure that the project's incremental contribution toward a cumulative impact would be less than significant.~~Pursuant to the Guidelines (Section 4.2.4), a project that is determined: (1) not to be an important agricultural resource under the LARA Model; (2) that would not have significant indirect impacts to agricultural resources due to the included Mitigation Measures and PDCs, or (3) that would not conflict with agricultural zoning or a Williamson Act Contract, would not have the potential to contribute to a cumulative impact. Therefore, cumulative impacts would be less than significant.~~

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6.0 Summary of Project Impacts and Mitigation

6.1 Project Impacts

As described in Chapter 2.0, the project was analyzed pursuant to the County's LARA Model and concluded that the project site did ~~not~~ contain significant agricultural resources. ~~Therefore~~Further, the direct impact to 43.8 acres of Prime and Statewide Importance soils was determined to be ~~would be less than~~ significant. Mitigation Measure 1 requires off-site agricultural conservations easements, participation in the PACE program (43.8 acres of credits required), on-site preservation, or a combination of the three options in order to reduce the direct impact to below a level of significance. ~~Similarly, The project was found to have a less than significant impact in association with agricultural zoning or Williamson Act conflicts (Guideline 3.1.a).~~

The project was found to have a less than significant impact in association with agricultural zoning or Williamson Act conflicts (Guideline 3.1.a). With respect to Urban/Agricultural Interface Compatibility conflicts (Guidelines 3.1.b and 3.1.c), the project's significant impacts would be reduced to less than significant with implementation of Mitigation Measures 2~~1~~ through 4 and the PDCs listed in subchapter 3.3. This conclusion was reached by identifying 13 areas, referred to as AAs, around the project perimeter, where there are intensive off-site ongoing agricultural operations, and where compatibility buffers would be required. As discussed in subchapter 3.2.3 above, several locations around the perimeter of the project would require the implementation of Mitigation Measures ~~1, 2, and 3~~2, 3, and 4.

Mitigation Measure 5~~4~~ is also included to ensure that interim agricultural uses, as the project is phased in over time, would not create indirect impacts. The mitigation measures would ensure indirect impacts would be less than significant for all identified AA areas. Further, 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. New nighttime lighting proposed by the project would be required to be shielded and directed away from the off-site parcels.

Cumulative impacts were discussed in Chapter 5.0, and were analyzed based on the same guidelines discussed for direct/indirect impacts. ~~Pursuant to the County's Guidelines, a project that is determined not to be an important agricultural resource under the LARA model, that would not have significant indirect impacts to agricultural resources, and that would not conflict with agricultural zoning or a Williamson Act Contract would not have the potential to contribute to a cumulative impact.~~ The conclusion reached with respect to the

loss of Important Farmland (specifically Prime and Statewide Importance soils) county-wide is that it would be cumulatively considerable; ~~however,~~and that the project's incremental contribution to this impact would ~~be less than~~also be significant. Mitigation Measure 1 would serve to reduce the project's incremental contribution to the cumulatively considerable loss of Prime and Statewide Important farmland to a level that is less than significant.

The analysis also reaches a conclusion that cumulative impacts to Williamson Act Contract lands and agricultural preserves would be less than significant. Lastly, cumulative edge (indirect) impacts were discussed and the analysis reached the conclusion that other cumulative projects would be required to implement either mitigation measures or PDCs, similar to the project; thus, the project's contribution would be less than cumulatively considerable with respect to indirect impacts.

6.2 Mitigation Measures and Project Design Considerations for Indirect Impacts

Several locations around the perimeter of the project would subject the adjacent off-site agricultural operations to significant indirect (compatibility) impacts both as a result of nuisance complaints from the residents about agricultural practices and from resident impacts such as trespass and pilfering. Mitigation measures and PDCs would be incorporated as follows:

6.2.1 Mitigation for Direct Impacts – Conversion

Mitigation Measure 1

Pursuant to the County Guidelines (page 45) for direct impacts, a 1:1 mitigation ratio would be required for impacts to the 46.3 acres of soils that meet the criteria for Prime Farmland or Farmland of Statewide Importance and which are "available for agriculture". As part of the project design 23.8 acres of agriculture would be preserved within existing biological open space corridors (see Figures 13a and 13b of the Biological Technical Report for Lilac Hills Ranch [RECON 2014]). However, only 2.53 acres of the 23.8 acres implemented as part of the project design (preserved permanently within a biological conservation easement) overlap with the 46.3 acres of Prime or Statewide Importance soils on-site. Therefore, the total acreage requiring mitigation is 43.8 and the applicant shall be required to implement one of the following options:

A. The applicant shall purchase mitigation credits through the County's 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, the applicant shall mitigate for the 43.8 acres of Prime and Statewide Importance soils impacted, at a 1:1 ratio, through the purchase of 43.8 acres of mitigation credits. The credits shall be purchased prior to the issuance of a grading permit.

B. In the event that PACE credits are unavailable or the applicant elects not to participate, the applicant may choose to independently secure conservation easements. The conservation easement shall prohibit non-agricultural uses and must include Prime and Statewide Importance soils of equal or better quality compared to the soils being converted and at a 1:1 ratio (43.8 acres). The conservation easements shall occur within the cumulative project area, or at a location approved by the Director of P&DS. The applicant shall grant the easement in perpetuity to the County prior to the issuance of a grading permit.

~~To the extent feasible, the applicant may choose to mitigate for 43.8 acres of impacts to Prime and Statewide Importance soils by preserving soils of equal value (Prime or Statewide Importance) within the project site.~~

C. The applicant may choose to mitigate for 43.8 acres of Prime and Statewide Importance soils through a combination of options ~~1, 2, and 3~~A and B so long as the total acreage of mitigation is equal to a 1:1 ratio (43.8 acres) and occurs on soils of equal value to those being converted. The applicant shall provide proof to the County that the mitigation has been implemented prior to the issuance of a grading permit.

6.2.2~~1~~ Mitigation for Indirect Impacts – Compatibility

Mitigation Measure 2~~1~~: A 50-foot-wide agricultural buffer planted with two rows of the appropriate tree crop (e.g., citrus, avocado) shall be provided. This buffer ~~is~~ shall be located where residential uses in Lilac Hills Ranch would abut existing, adjacent orchards and will be used to create a transition and buffer between the two uses.

Mitigation Measure 3~~2~~: A 6-foot-high fence shall be maintained to prevent trespass and intrusion by people and domesticated pets. The fence shall be restricted to one of two types (refer to Exhibit 137 of the Specific Plan): 1) the solid masonry type with a foundation that extends below ground level with no gaps; or 2) the type that is a combination of masonry and metal fencing.

Mitigation Measure 4~~3~~: A Limited Building Zone shall~~,~~ prohibit~~ing~~ habitable structures as well as any structure which could attract residents, visitors, or children to within close proximity to the AA area (and the proximate agricultural operations). The ~~prohibition would~~LBZ shall extend to (but is not limited to) ball fields, swimming pools, horseshoe pits, picnic areas, or any other use that would attract or keep people near the project boundary or

AA. This LBZ would ensure that residents would not be congregating within areas in proximity to off-site pesticide application.

6.2.3~~2~~ Mitigation for Indirect Impacts - Interim Phasing

Mitigation Measure 5~~4~~: Pursuant to the Specific Plan Figure 142, the project shall include a 100-foot fuel modification zone/limited building zone between ongoing agricultural uses and residential development, for each phase of development. The fuel modification zone/limited building zone ~~The applicant/HOA shall exercise control over interim agricultural operations on-site through specific terms of agricultural leases. Through the execution of agricultural leases, the applicant/HOA will prohibit aerial pesticide spraying and will take all precautions to minimize other impacts (both to and from future residents) including noise and dust generation, trespassing, and vandalism. All storage and use of hazardous materials and pesticides within these agricultural areas~~ shall comply with all State Law and the County Agricultural, Weights and Measures Regulations.

6.2.4~~3~~ Project Design Considerations

PDC-1: A Fuel Modification Zone would be maintained at varying widths around the perimeter of the project site as identified in the Fuel Protection Plan prepared for the project.

PDC-2: 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~~ shall notify potential owners that the adjacent property could potentially be used for agricultural operations such as fruit and flower production and that there could be associated issues such as odors, noise, and vectors. The notice ~~would~~ shall also notify future residents that these agricultural uses within the vicinity of the project maintain certain rights to practice agriculture in accordance with normal and accepted practices.

PDC-3: The lighting and illumination standards for the project ~~will~~ shall be complementary to the architecture and land uses throughout the project area. Community lighting ~~will~~ shall be designed to provide adequate illumination for safety, security, and architectural accents without over lighting. Light fixtures ~~will~~ shall direct light to use areas and avoid light intrusion into adjacent agricultural and other land use areas. Light shields ~~will~~ shall be used where necessary to avoid nuisance lighting, particularly in residential neighborhoods and adjacent to preserved natural open space. Lighting, including all landscape low voltage decorative lighting, shall comply with the County's light pollution code.

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8.0 List of Preparers and Persons and Organizations Contacted

8.1 Preparers

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8.2 Persons and Organizations Contacted

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Dexter Wilson, Dexter Wilson Engineering, Inc.
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ATTACHMENT A~~1~~

LARA Model Analysis

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Attachment A~~1~~
LARA Model Analysis

1.0 Factors

1.1 Water

The project site is within the County Water Authority (CWA) and is served by the Valley Center Municipal Water District (VCMWD) which has existing water transmission, storage, and distribution facilities in the vicinity of the project site. VMCWD has delivered in excess of 250 acre-feet of water per year to the 608 acre project site, principally for irrigation. ~~Many of~~ The ~~properties~~ project site also contains working wells (see Figure 4) and uses groundwater to supplement water from VCMWD in order to irrigate orchards and common area landscaping during drier and hotter periods of the year. Groundwater aquifer type under the project site is Fractured Crystalline Rock, which can store groundwater, but is not considered to have as much capacity as other aquifer types.

The project proposes to use recycled water from the on-site water reclamation facility to irrigate common and agricultural areas throughout the project site. The project would include the construction of recycled water production and distribution facilities for irrigation of common area landscaping, slopes, parks, school fields, and as the primary method for irrigation of the retained groves, thereby reducing the need for imported water.

As discussed above, this portion of the Valley Center community is within the boundaries of the CWA and is served by the VCMWD which has existing water transmission, storage, and distribution facilities in the vicinity of the project site. There are water connections and meters to portions of the project site and VMCWD has delivered in excess of 250 acre-feet of water per year to irrigate the approximately 394 acres of existing agriculture. Thus, pursuant to LARA Model Table A-1, the project receives a **High** rating.

1.2 Climate

San Diego County is divided into a series of "plantclimates," which ~~are defined as areas "[i]~~occur as a series in which specific plants, groups or associations are evident and will grow satisfactorily, assuming water and soil are favorable~~." (Gilbert 1970)~~. Plantclimates in San Diego County occur as a series of five generally north-south trending linear zones, including the Maritime, Coastal, Transitional, Interior and Desert zones. These areas are influenced by factors including topography and proximity to the ocean, and are generally gradational inland.

Localized climate zones were adapted from the described plantclimates, and are termed Generalized Plantclimate Zones, or Sunset Zones. Sunset Zones differentiate local microclimates, freeze/frost potential, and air/water drainage based on conditions such as latitude, elevation, topography, and the influence of oceanic and/or continental air masses. Sunset Zones were not developed as a tool to determine the suitability for commercial agricultural production; therefore, their use is not intended to determine suitability for specific crops. They are a measure of overall climate suitability for the typical agricultural commodities produced in San Diego County.

The project site lies within Zone 23 of the Sunset Zone plant climates, which represents the thermal belts of the Coastal Area climate and is favorable for growing subtropical plants such as avocados. Zone 23 covers the coastal incorporated cities as well as unincorporated communities and is assigned a **High** rating due to the favorable growing conditions of this zone (Table A-2).

TABLE A-1
WATER RATING

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

TABLE A-2
WESTERN PLANTCLIMATE ZONES

Sunset Zone	Rating
23	**High**
21	High
20	High
19	High
18	Moderate
13	Moderate
11	Low
3	Low

1.3 Soil Quality

Soil types within the project area and vicinity consist of a series of sandy loam, coarse sandy loam, rocky sandy loam, and steep gullied land (USDA 1973~~; San Diego Geographic Information Source 2014~~). Sandy loam and coarse sandy loam soils in the following soil series are present: Bonsall, Cieneba, Fallbrook, Greenfield, Placentia, and Visalia (see Figure 7). Soils on steeper slopes and in gully bottoms are characterized as steep gullied land. These soil types are derived from weathered and decomposed granite or granodiorite. Runoff is described as moderate to rapid and the erosion hazard is moderate to high for these soil types.

Additionally, as shown on Table A-3 below, each soil type is categorized based on the County of San Diego agricultural guidelines, which utilize a system of determining which soils are unavailable for agricultural use. Pursuant to the established guidelines, soils "unavailable for agricultural use" include: (1) lands with existing structures (paved roads, homes, etc.) that preclude the use of the soil for agriculture, (2) lands that have been disturbed by activities such as legal grading, compaction, and/or placement of fill such that soil structure and quality have likely been compromised (e.g., unpaved roads and parking areas), (3) lands that are primarily a biological habitat type that have never been used for agriculture, and (4) lands constrained by biological conservation easements, biological preserve, or similar regulatory or legal exclusion that prohibits agricultural use." Table A-4 shows the interpretation of soil qualities.

Table A-4 includes a qualifying statement "…or has a minimum of 10 acres of contiguous Prime or Statewide Importance Soils". There is one soil type on-site that could potentially meet this criteria~~a~~on; the Fallbrook sandy loam, 5 to 9 percent slopes, eroded or "FaC2" soil type that comprises 32.59 acres of the site, 27.38 acres of which are "available for agriculture". There are two separate concentrations of the FaC2 soils that comprise the 27.38 acres (Figure 15); the eastern area is 12.74 acres and the western area is 14.64 acres. Both of these areas could be considered fragmented because of overlying factors such as the presence of riparian corridors, native habitat, a residence and outbuildings, hard packed dirt roads, imported fill, and other factors that modify the characteristics of the soil.

However, much of the fragmentation occurs due to the presence of hard-packed dirt roads used to access the groves and the estate residences. Many of the roads are not covered by an easement and could potentially be converted back to agricultural use through standard agricultural practices. Therefore, a conservative approach of considering only the baseline soils data as mapped by the NRCS was taken in order to provide a worst-case analysis. Accordingly, because both of these areas contain 10 acres or more of contiguous soils of Prime or Statewide Importance, a **Moderate** rating was applied to the Soils Quality primary factor. ~~Of the soils on-site, only one could potentially meet this definition: Fallbrook sandy loam, 5 to 9 percent slopes, eroded (FaC2), of which there are 25.24 acres in total within the project site. Therefore, Figures 14, 15a, and 15b are included as part of this LARA model analysis in order to demonstrate that while there is a relatively large acreage of FaC2 soils within the project site; there are no locations with 10 or more contiguous acres.~~

TABLE A-3
SOIL QUALITY

Soil Map Unit	Project Acres	LCC	Storie Index	Available for Ag Use	Unavailable for Ag Use	Proportion of site Available	Prime or Statewide 1 for Yes; 0 for No	Matrix Score
Bonsall sandy loam, 9 to 15 percent slopes, eroded	7.15	IVe-3(19)	39	7.15	0	0.018	1	0.018
Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes	168.73	VIIe-7(19)	7	115.88	52.85	0.292	0	0.000
Cieneba coarse sandy loam, 15 to 30 percent slopes, eroded	53.43	VIe-1(19)	15	32.01	21.42	0.081	0	0.000
Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded	0.24	VIIe-1(19)	6	0.16	0.08	0.000	0	0.000
Cieneba rocky coarse sandy loam, 9 to 30 percent slopes, eroded	9.86	VIIs-8(19)	10	7.56	2.30	0.019	0	0.000
Fallbrook rocky sandy loam, 9 to 30 percent slopes	3.41	VIe-7(19)	13	0.84	2.57	0.002	0	0.000
Fallbrook sandy loam, 15 to 30 percent slopes, eroded	210.14	VIe-1(19)	35	148.80	61.34	0.374	0	0.000
Fallbrook sandy loam, 5 to 9 percent slopes, eroded	32.59	IIIe-1(19)	51	27.38	5.21	0.068	1	0.068
Fallbrook sandy loam, 9 to 30 percent slopes, severely eroded	12.94	VIIe-1(19)	37	10.72	2.22	0.027	0	0.000
Greenfield sandy loam, 5 to 9 percent slopes	4.46	IIe-1(19)	77	1.38	3.08	0.003	1	0.003
Placentia sandy loam, 2 to 9 percent slopes	10.20	IVe-3(19)	49	9.9	0.3	0.024	1	0.024
Placentia sandy loam, 9 to 15 percent slopes, eroded	3.93	IVe-3(19)	41	3.75	0.18	0.009	0	0.000
Steep gullied land	81.46	VIIIe-1(19,20)	<10	40.44	41.02	0.102	0	0.000
Visalia sandy loam, 2 to 5 percent slopes	8.98	IIe-1(19)	81	.5	8.48	0.001	1	0.001
Grand Total	**607.53**			406.47	201.05	1		0.115

TABLE A-4
SOIL QUALITY MATRIX INTERPRETATION

Soil Quality Matrix Score	Soil Quality Rating
Site has a Soil Quality Matrix score ranging from 0.66 to 1.0 and at least 10 acres of contiguous Prime or Statewide Importance Soils	High
Site has a Soil Quality Matrix score ranging from 0.33 to 0.66 **or has a minimum of 10 acres of contiguous Prime or Statewide Importance Soils**	**Moderate**
Site has a Soil Quality Matrix less than 0.33 and does not have at least 10 acres of contiguous Prime or Statewide Importance Soils	Low

1.4 Surrounding Land Use

Because all of the LARA Model Required Factors were moderate or higher, the Complementary Factors must also be analyzed. The following subchapters below describe the analysis that results in each of the three LARA Model Complementary Factor ratings.

Analysis of the Complementary Factors requires utilization of the ~~"Zone of Influence" or~~ ZOI. The County Guidelines (page 33) provide the methodology for calculating the ZOI; but the process generally consists of drawing (using GIS) a ¼ mile buffer around the entire project site; the ZOI would then consist of any and all parcels that are within or intersect with the ¼ mile buffer line (excluding the parcels th~~e~~at comprise the project site itself).

The more compatible a site is with the surrounding land uses, the more likely it is to avoid nuisance complaints and other issues from non-farm neighbors. This factor accounts for the degree to which the vicinity is agricultural and assigns a higher rating to a site ~~which~~ that lies within an agriculture-dominated area. The LARA model recognizes that agriculture can be viable amongst urban uses; but that its long term viability is generally less because of increased economic pressures to convert it to urban uses. Table A-5 below is used to identify the appropriate surrounding land use rating according to the percentage of land that is "compatible with agriculture". Based on the Guidelines (~~P~~page 33), the uses considered "compatible with agriculture" include existing agricultural lands, protected resource lands, and rural residential lands. The rural residential lands must be two-acre parcel sizes or greater and must include elements of the rural residential lifestyle such as equestrian or animal raising, hobby agriculture, or vacant lands. Parcels with children's play areas, swimming pools, or secondary housing units would not meet this definition.

TABLE A-5
SURROUNDING LAND USE RATING

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

For the proposed project, the ZOI was calculated to be 2,604 acres. Within the ZOI, the areas determined to be ~~C~~consistent with agriculture totaled 1,650.5 acres or 63.4%. The site would therefore receive a **High** rating for the Surrounding Land Use Complementary Factor.

1.5 Land Use Consistency

The Land Use Consistency analysis consists of comparing the project's median parcel size with the median parcel size of all the parcels within the ZOI. The reason for this methodology is that the County recognizes that a site surrounded by larger parcels indicates the site is located in an area that has not already been significantly urbanized; whereas a site surrounded by smaller parcels would likely experience incompatibilities and the corresponding reduction in economic viability when considering foregone opportunity costs. Table A-6 provides the comparison table to determine the site's appropriate Land Use Consistency rating.

TABLE A-6
LAND USE CONSISTENCY RATING

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

The median parcel size of the project site's 58 parcels was calculated to be 5.36 acres, while the median parcel size of all the parcels within the ZOI is 2.8 acres. The project would therefore receive a **Moderate** rating for Land Use Consistency.

1.6 Slope

Slope is a Complementary Factor in the LARA model to account for the role that topography plays in the viability of a parcel for agricultural production. While certain crops (e.g., avocados) can thrive on steeply sloped land, gentle topography allows for a wider range of potential uses and is easier for the operator to manage with regard to runoff and soil erosion. Slope is not a Required Factor because the limitations of topography can be overcome if the expected return on investment is high enough to warrant the expense. Table A-7 provides the Slope Rating.

TABLE A-7
SLOPE RATING

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

The average slope across the project site's 608 acres is 18.3%; the site would, therefore, receive a **Moderate** Slope rating.

2.0 LARA Model Result

Based on the results of the LARA Model, the site is ~~not~~ considered an important agricultural resource. The results of the model analysis, which are discussed above, are summarized in Table A-8~~5~~ below. Table A-8~~5~~ shows that the site received a ~~low~~ moderate rating for soil quality and a high rating for climate and water resources. These three criteria are Required Factors, pursuant to the LARA Model, ~~and a rating of low for any one Required Factor automatically identifies the project site as not an important agricultural resource~~. Since two out of the three Required Factors are rated high and one was rated Moderate~~low~~, the~~re is no need to analyze the~~ Complementary Factors were also analyzed pursuant to ~~found in~~ the LARA Model. The site received a high rating for the Surrounding Land Uses and a moderate rating for both Land Use Consistency and Slope. Therefore, based on Table A-9~~6~~, this result would place the project within Scenario 2~~5~~, which means that the site is ~~**not**~~ **an important agricultural resource**.

TABLE A-~~8~~5
LARA MODEL RESULTS

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

TABLE A-~~9~~6
LARA MODEL RESULTS INTERPRETATION

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