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. 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 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 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, the project would develop the site with 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
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 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 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 46.3 acres meet the criteria to be both classified as a soil of Prime or Statewide Importance and "available for agriculture".

The project includes "Common Areas/Agriculture" and "Manufactured Slopes" (see Table 8 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. The on-site biological open space allows for continued agricultural use of existing agricultural uses within the on-site biological open space easements. Therefore, it can be assumed that, with the exception of the 2.53 acres (preserved permanently for agricultural use 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 of soils that meet the Prime and Statewide Importance soil candidate criteria within the ~~agricultural buffers/~~biological open space, to be established as part of the project design, is shown on Figure 18. With preservation of the 2.53 acres, ~~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), the site 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 the project site 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. 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 Station:** 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

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 conservation easements shall be located 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.

~~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.~~

~~D.~~C. The applicant may choose to mitigate for 43.8 acres of Prime and Statewide Importance soils through a combination of options A or B~~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.

The 1:1 mitigation ratio is consistent with recommendations typically provided by the Department of Conservation to address impacts to agricultural resources under CEQA; the Department of Conservation only recommends a higher mitigation ratio if the land being impacted is under a Williamson Act contract, or the project would result in growth inducing or cumulative impacts (County Guidelines, page 47). In this case, none of the impacted lands are under a Williamson Act contract. As to growth-inducing impacts, Chapter 1 of the Final EIR (subchapter 1.8) identified the potential for the project to induce growth. However, any impacts associated with potential growth inducement would be speculative because the specific nature, design, and timing of future projects is unknown at this time. For example, while growth could be encouraged due to the intensification of on-site land uses, it is speculative to assume that development would occur on (i.e., convert) agricultural soils identified as Prime or Farmland of Statewide Importance. In addition, while the proposed project would result in potentially significant cumulative impacts, the mitigation measure recommended to mitigate the project impacts would also mitigate the project's contribution to cumulative impacts. The 1:1 mitigation ratio and preservation of off-site resources is consistent with recent CEQA case law and the practice of other jurisdictions in the state. Thus, the 1:1 mitigation ratio is adequate to mitigate the project's direct impacts.

2.5 Conclusions

As described above, and detailed within Attachment A, the site received **high** scores for climate and water 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 an important agricultural resource pursuant to Scenario 2 within Table A-6 of the County's LARA model. Accordingly, direct impacts to agricultural resources would be significant, and 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. PACE mitigation lands are included in the PACE program based on an evaluation of criteria, including, but not limited to, the level of development pressure on the property, density reduction realized through recent adoption of the General Plan, agricultural viability as evaluated through the County LARA model, the degree that the land could contribute to assemblage of the Multiple Species Conservation Plan, and cost of the easement relative to the program's available funds. (See Attachment B, PACE Program Information.) As the PACE program has been developed as an overall programmatic solution to address preservation of agricultural lands within the unincorporated area, the County has determined that 1:1 mitigation through purchase of PACE mitigation credits is adequate to mitigate the identified impacts. 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 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 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.

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

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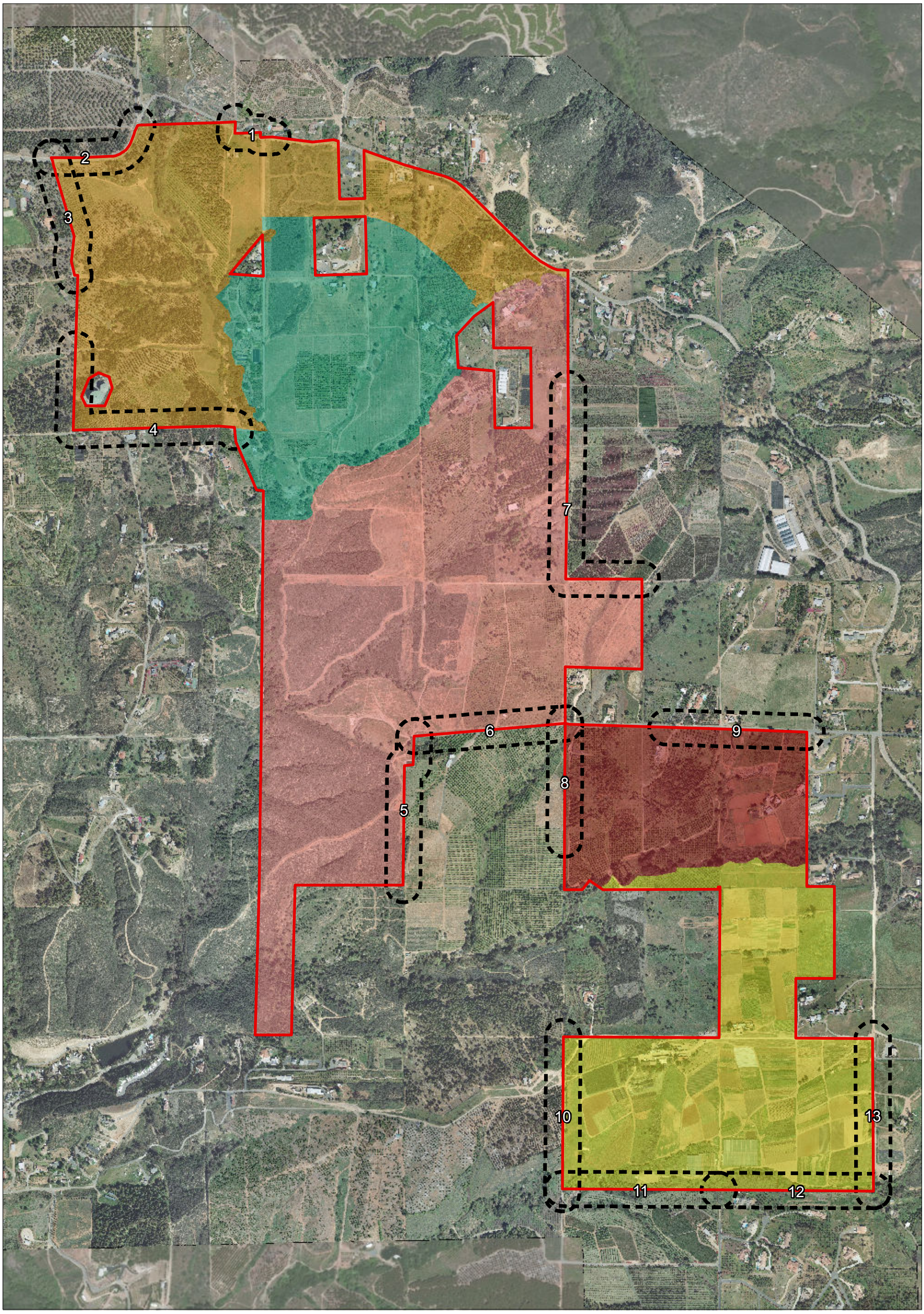

FIGURE 16

Off-site Compatibility/Agricultural Adjacency Areas

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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.

The Specific Plan includes various features that would promote project compatibility with surrounding agricultural operations to avoid land use compatibility conflicts. The Specific Plan requires certain maps to be designed to locate open space or larger lots near the project boundaries to provide a land use transition to adjacent existing agricultural operations (Specific Plan, Part III, Section E.4.b.xi). The Specific Plan also includes roadway landscaping standards that are specific to roadways adjacent to portions of the community's perimeter, offering opportunities to create blended transitions between the developed, ornamental portions of the community and the surrounding agriculture or natural open space (Specific Plan, Part III, Section D.3.c). These areas would be planted with primarily native and naturalizing drought-tolerant plant species with possible addition of groves of fruit trees.

Part III of the Specific Plan, Section J.2 describes the agricultural uses proposed in the on-site open space that would also provide land use transitions and increase compatibility with off-site agricultural operations. In addition, the Specific Plan allows for interim agricultural uses to continue on-site prior to their development (Specific Plan, Part III, J.2.c.). Part III of the Specific Plan, Section E.4.b.xi. provides site planning guidelines for single-family detached residential neighborhoods and specifically states, "Certain Final Maps will be required to plot the largest of the lots proposed on each such map along the community boundary in situations where project single-family development will be at the same grade as the adjacent existing homes that will remain in the Semi-Rural Regional Category. Consideration will be given to additional opportunities to reduce conflicts including providing a grade separation and planting buffers to allow vegetation to mature and screen the adjoining properties." These project design features improve project compatibility with the surrounding community and surrounding agricultural operations.

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 complaints to 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. 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, 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 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~~7). As both the park and school are sensitive receptors and will result in concentrations of people, they are each 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 trespass/vandalism conflicts. As shown in the Landscape Plan (FEIR Figure 1-14), an additional row of trees would be provided along the southern boundary of the school site. 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.

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 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.

Because the project design locates the school site 325 feet away from the project boundary, the presence of the intervening landscaping and park (P-~~10~~7), 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 directly adjacent to the off-site orchards. The proposed park is located within Phase 3 of the project. Subchapter 3.2.3.4 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 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 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~~Care

The Group Care facility ~~residential (GR)~~ would include ~~group care land uses with~~ units for independent living, assisted living, and 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

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 Limited Building Zone (LBZ) exhibits, as well as a review of the San Diego Geographic Information Source 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 - Implementation of 50-foot-wide buffer zone, planted with two rows of trees (except AA 9, see below);

- Mitigation measure 3 - 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 - Restriction of placement of any structures within the existing 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, 2014

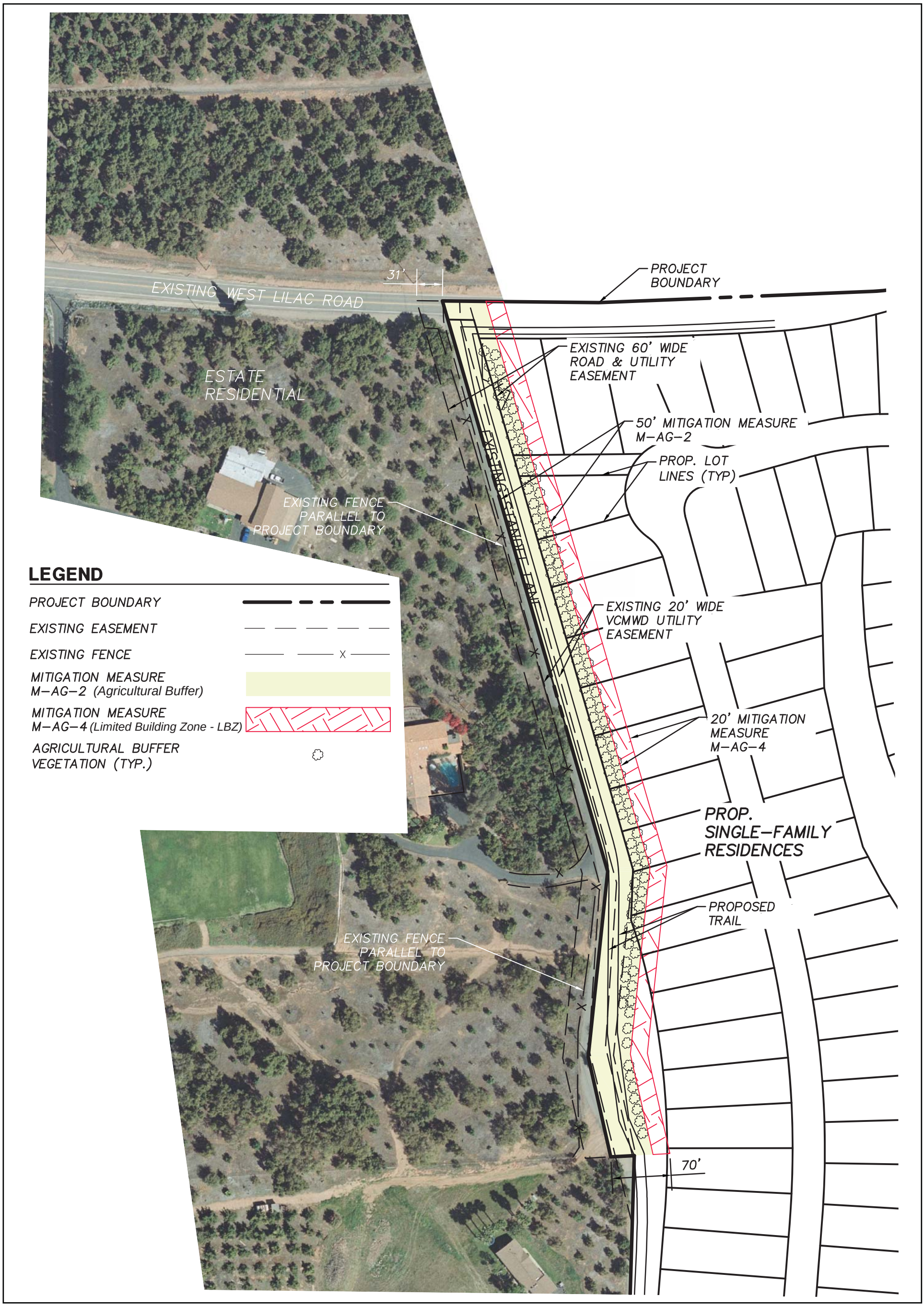

FIGURE 16a
Agricultural Adjacency Area 3 (Impact AG-5)

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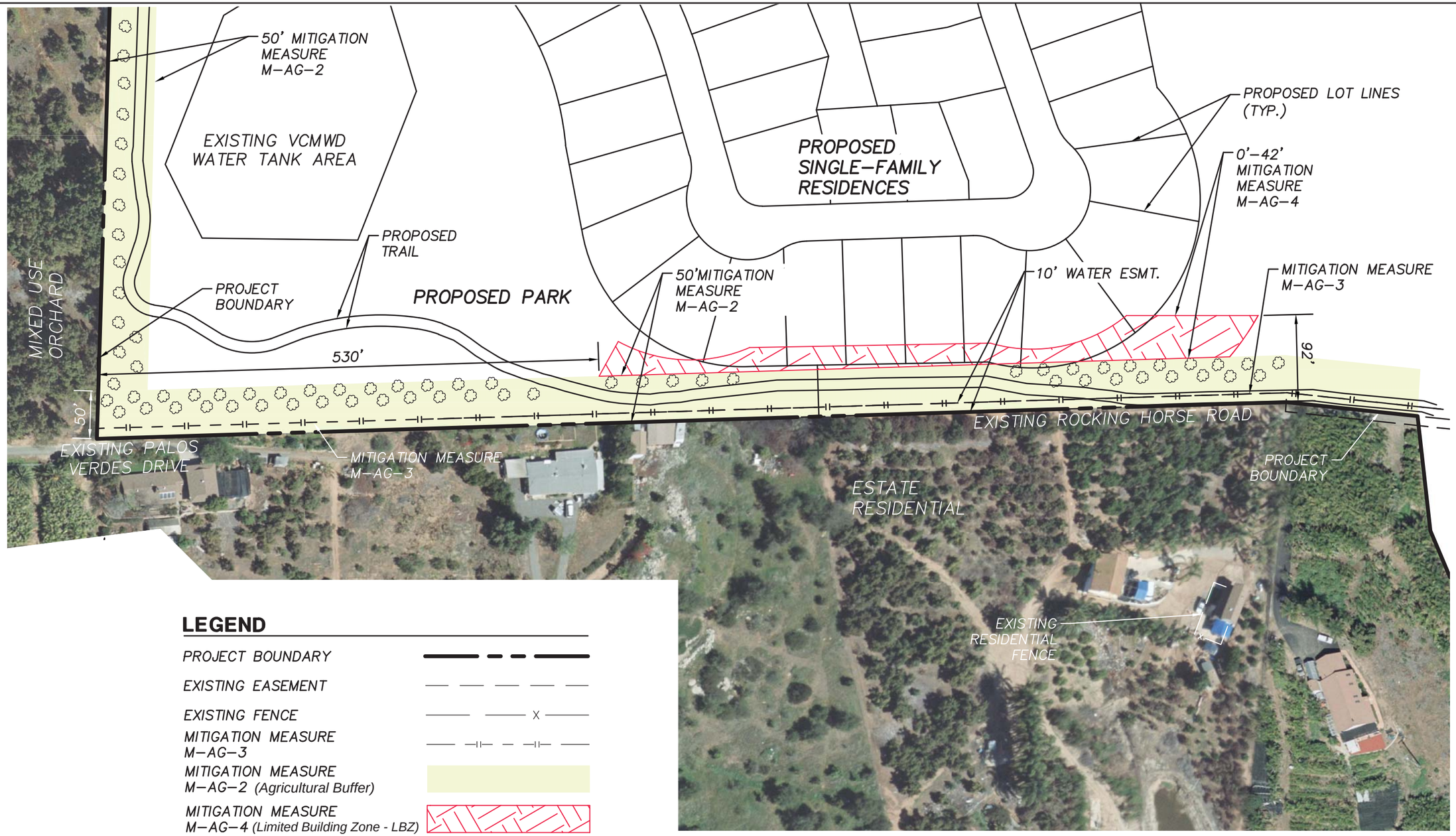
Map Source: Landmark Consulting, 2014



LEGEND

- PROJECT BOUNDARY
- EXISTING EASEMENT
- EXISTING FENCE
- MITIGATION MEASURE M-AG-3
- MITIGATION MEASURE M-AG-2 (Agricultural Buffer)
- MITIGATION MEASURE M-AG-4 (Limited Building Zone - LBZ)
- AGRICULTURAL BUFFER VEGETATION (TYP.)

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FIGURE 16b

Agricultural Adjacency Area 4 (Impact AG-6)

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Map Source: Landmark Consulting, 2014

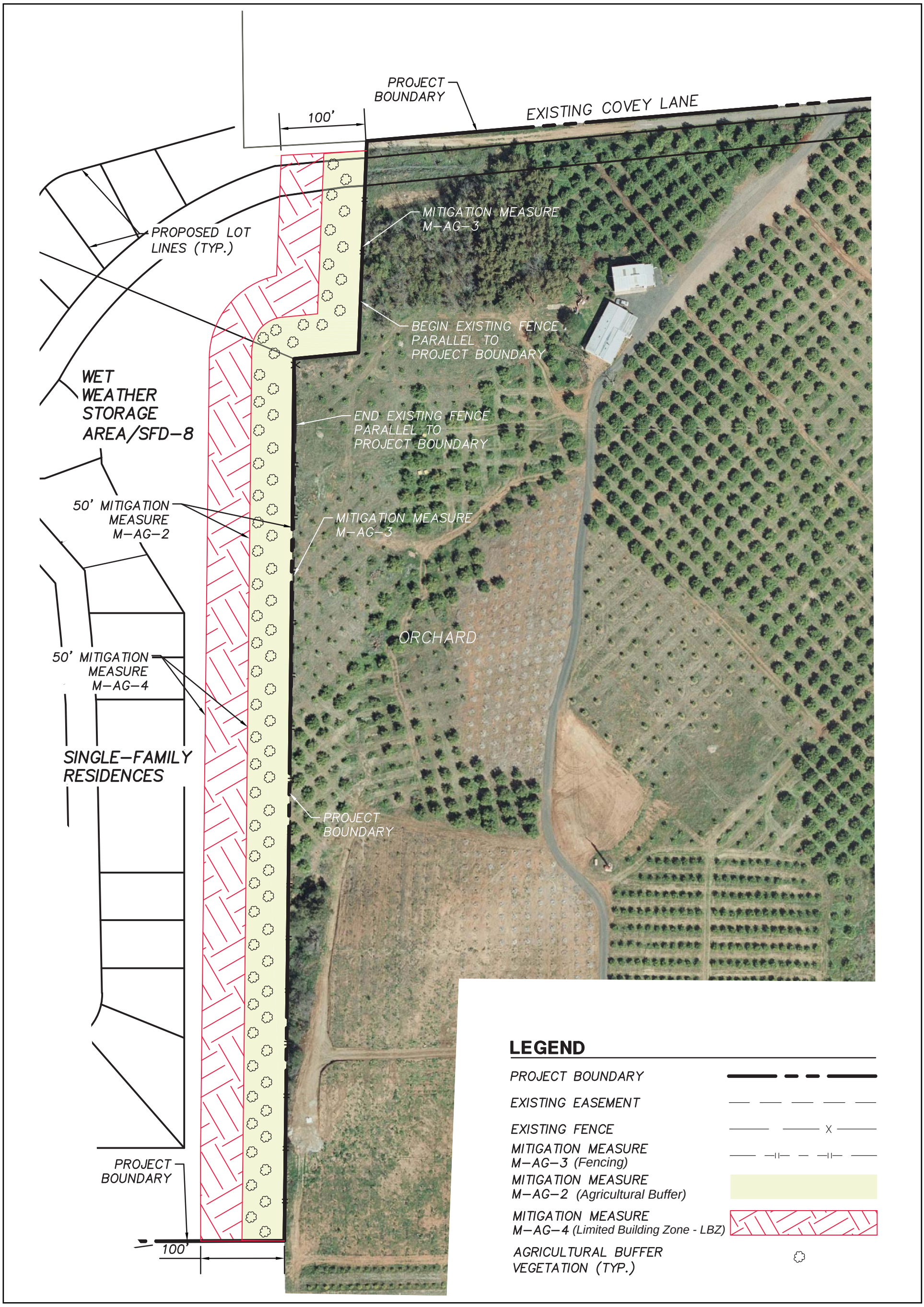

FIGURE 16c
Agricultural Adjacency Area 5 (Impact AG-7)

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Map Source: Landmark Consulting, 2014

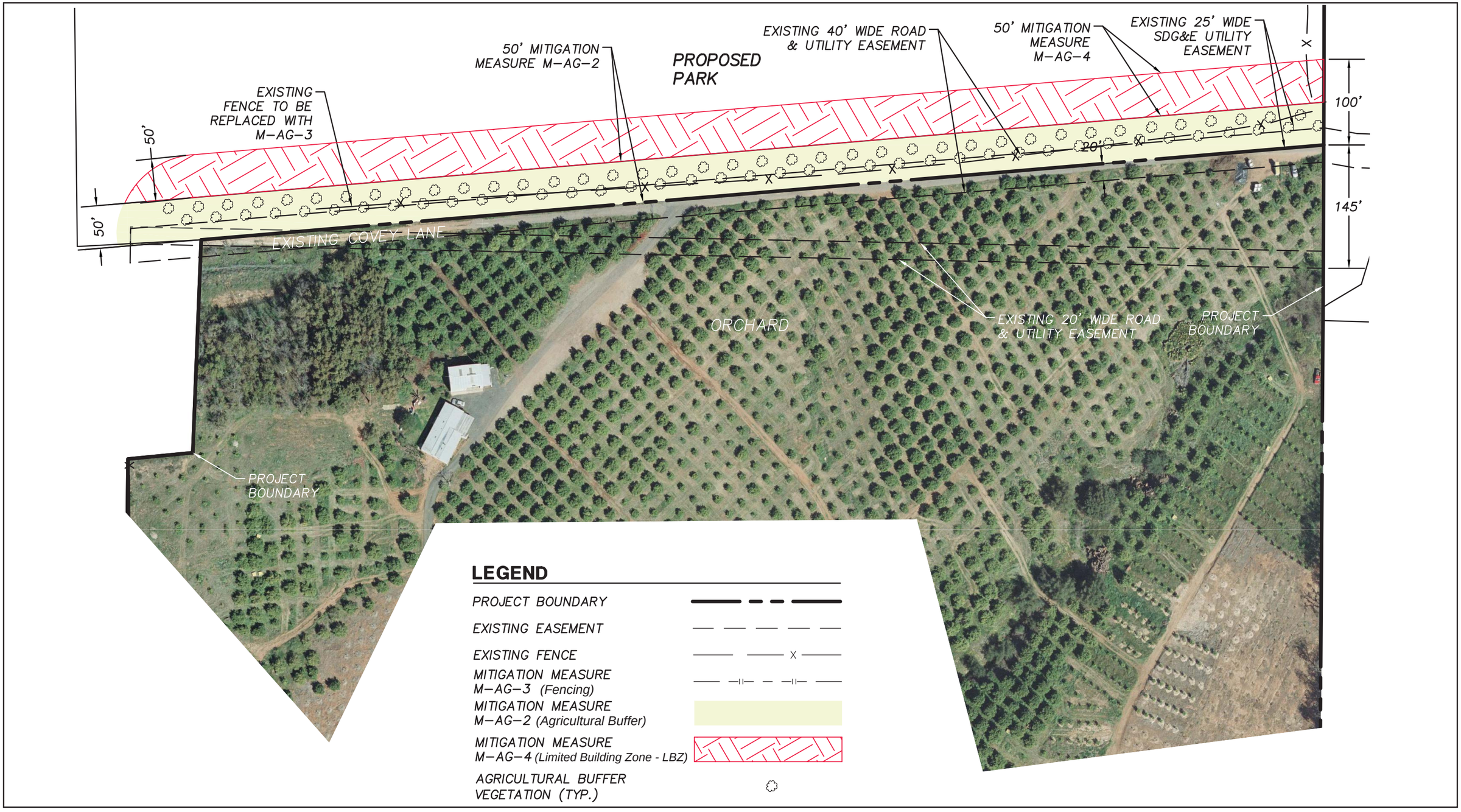

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FIGURE 16d

Agricultural Adjacency Area 6 (Impact AG-2)

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Map Source: Landmark Consulting, 2015

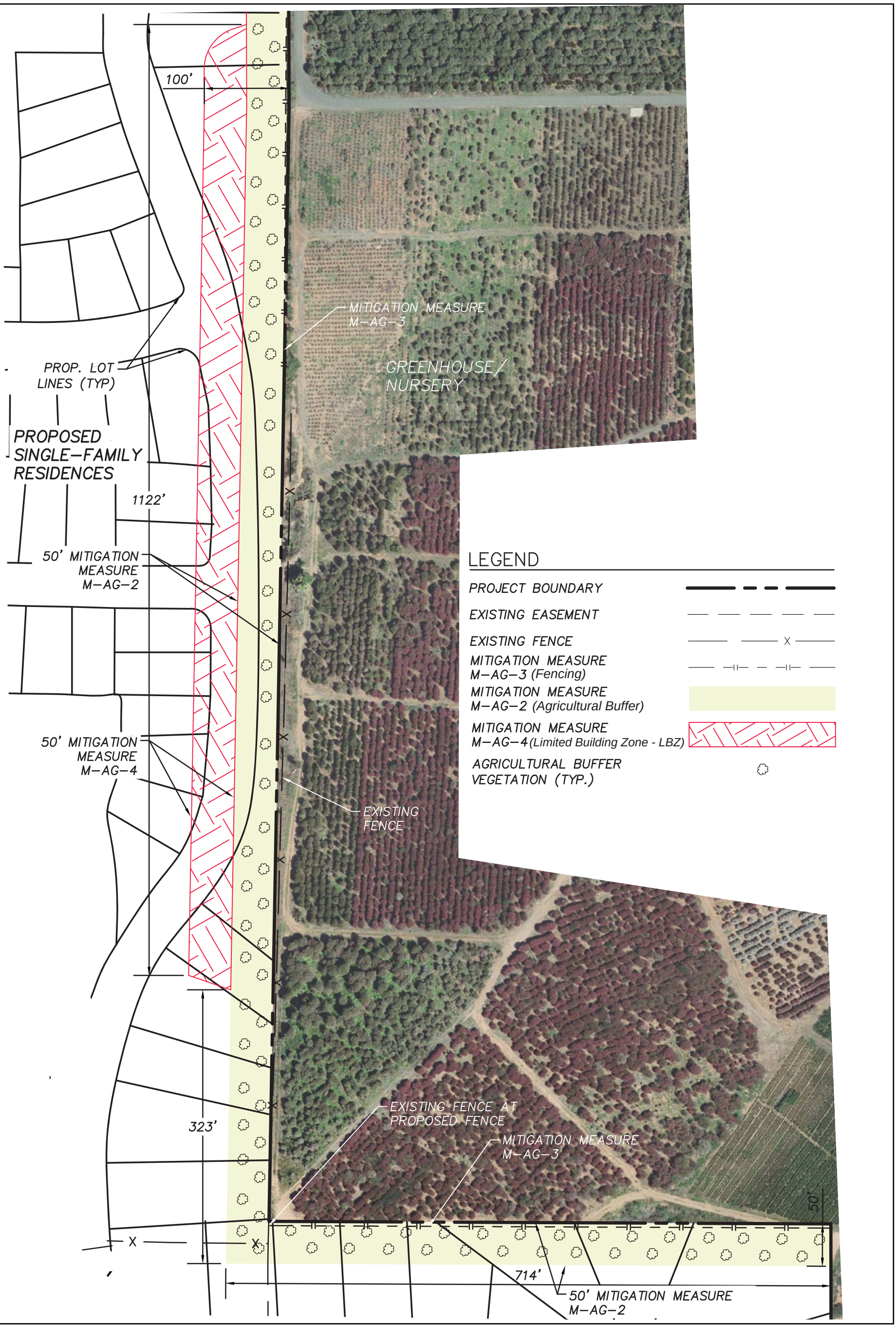

FIGURE 16e
Agricultural Adjacency Area 7 (Impact AG-8)

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Map Source: Landmark Consulting, 2014

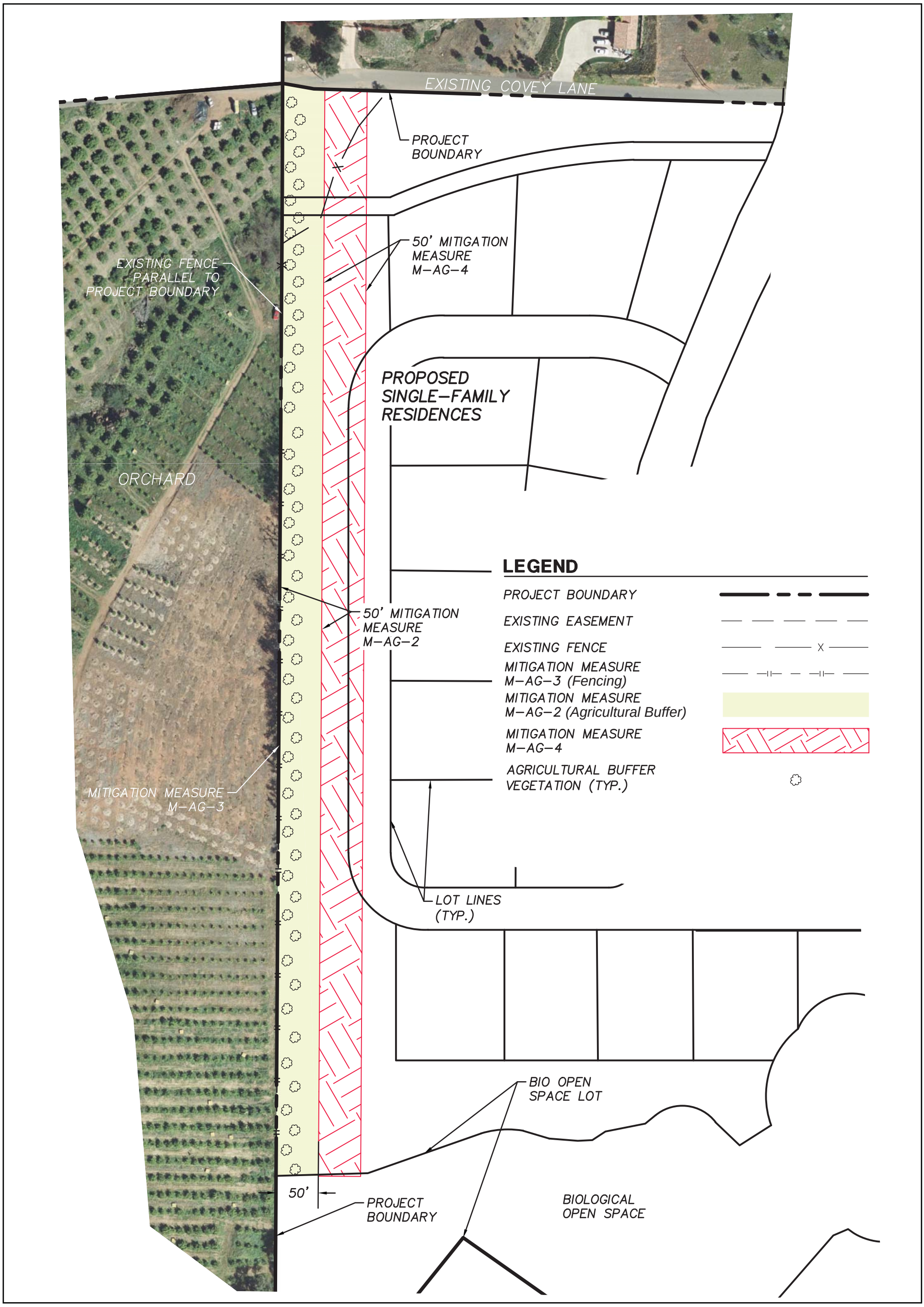

FIGURE 16f
Agricultural Adjacency Area 8 (Impact AG-4)

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Map Source: Landmark Consulting, 2014

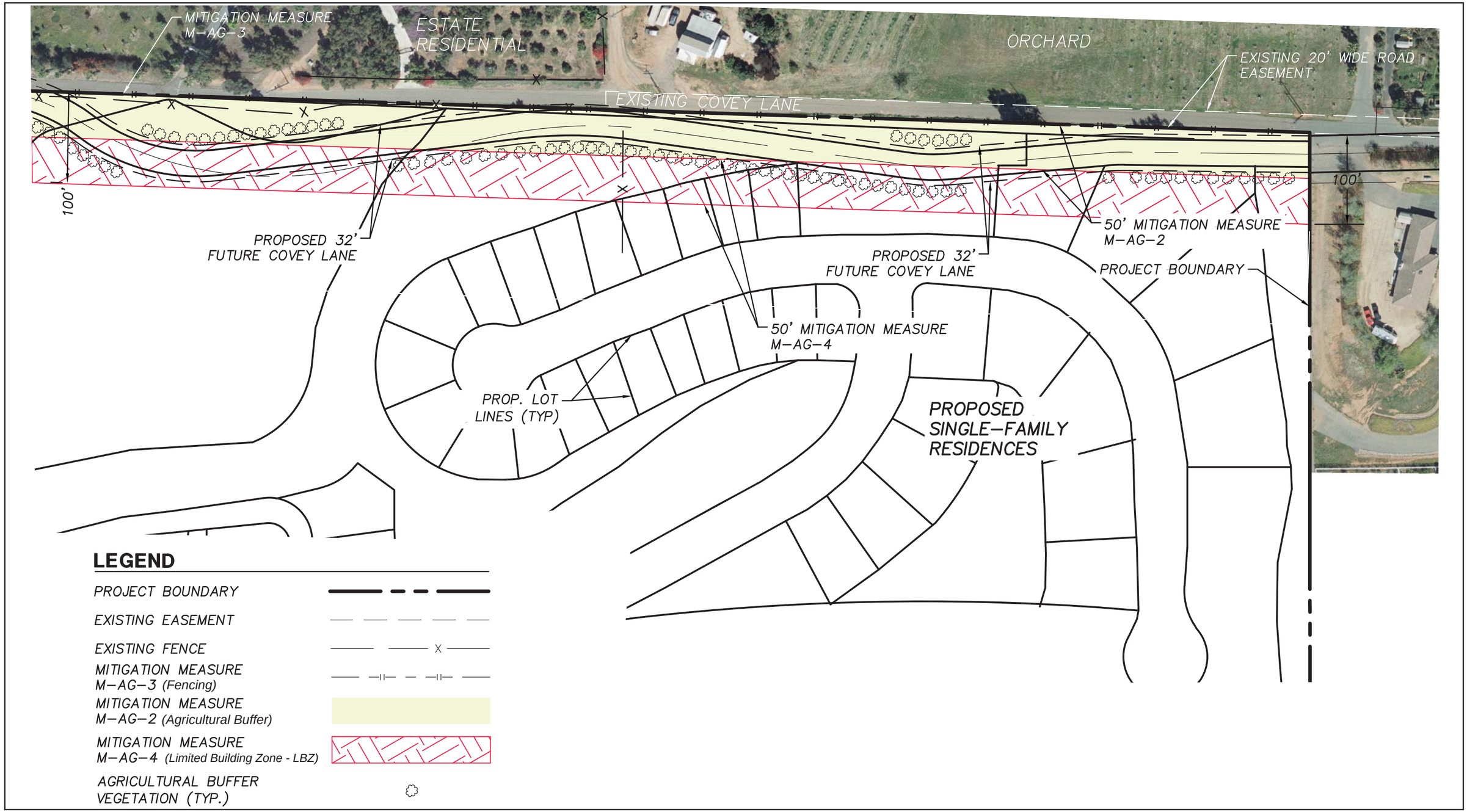

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FIGURE 16g

Agricultural Adjacency Area 9 (Impact AG-9)

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Map Source: Landmark Consulting, 2014

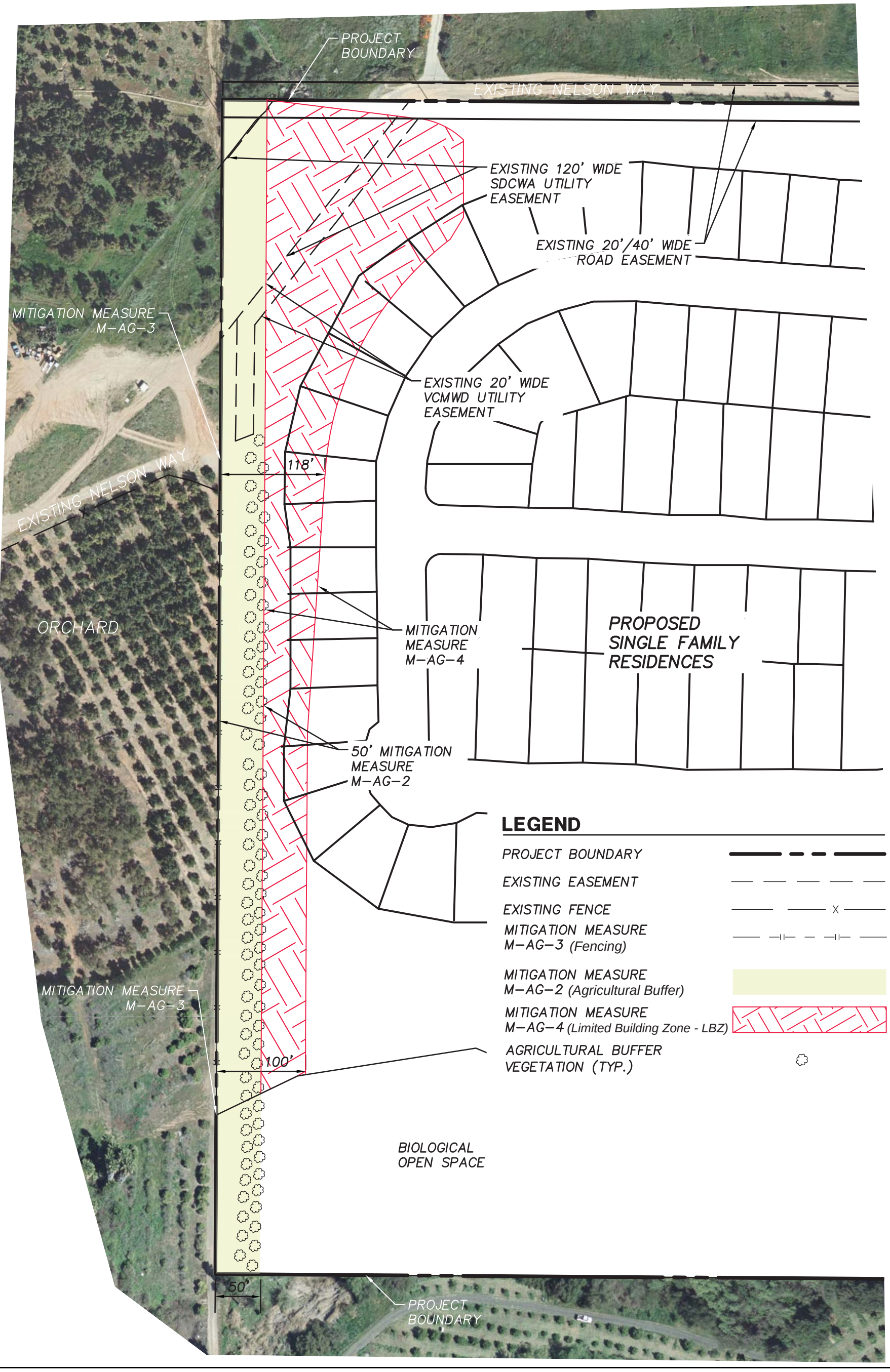

FIGURE 16h
Agricultural Adjacency Area 10 (Impact AG-10)

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Map Source: Landmark Consulting, 2014

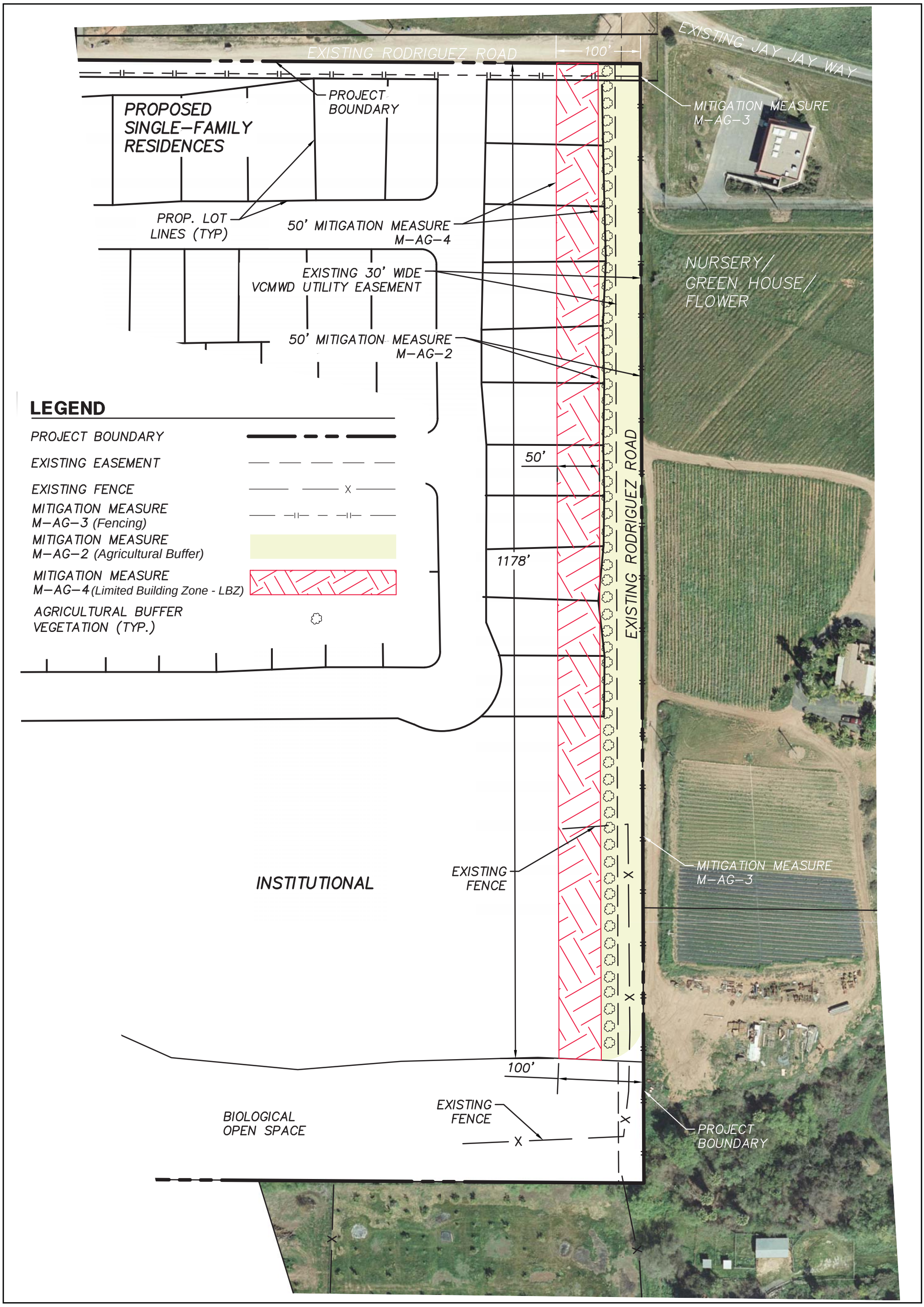

FIGURE 16i
Agricultural Adjacency Area 13 (Impact AG-3 & AG-11)

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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) 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), which includes Standel Lane, 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 and 4 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, a 50-foot agricultural buffer would be provided that includes the 30-foot half-width of the road/utility easement in addition to ~~the two rows~~a single of orchard trees (due to constraints from the road).~~would work on conjunction with the 50-foot agricultural buffer on-site~~ In addition, a 20-foot agricultural LBZ would be provided on-site. In

~~for a~~ total, ~~of 8~~70 feet of buffer width would be provided. 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, adjacent to the existing Rocking Horse Road (see Figure 16b). The project would retain a portion of the existing orchards surrounding the "NAP" water tanks. A 50-foot agricultural buffer would be provided that includes two rows of orchards except in locations where a proposed trail meanders through the buffer. 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, a proposed trail, and a public road) to 70~~75~~ feet and up to 92 feet in the widest portion of the proposed LBZ. 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 2, 3, 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 and a proposed trail) to 70~~75~~ feet and up to 92 feet in the widest portion of the proposed LBZ. In addition, a proposed fence along the northern boundary of Rocking Horse Road along the length of the AA would provide further separation between land uses.

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 include a fire station and private recreation facilities. 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, 3, and 4 would be required along AA 5. The combination of the 50-foot agricultural buffer (with two rows of trees) in conjunction with the ~~100~~50-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 redesignate the parcel's from SR4 to SR2. If VC11 converts to a non-agricultural use prior to the development of Phase 3, implementation of mitigation measure 2 would not be required at this location.

- AA 6 is located along the southern boundary of proposed school and public park (Park P-~~10~~7). Off-site orchards are located adjacent to the project site in this location. However, t~~T~~he 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 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 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; however, this off-site portion is not included in the total buffer width. Therefore, the combination of the 50-foot agricultural buffer, the 50-foot agricultural LBZ, ~~and~~ including the on-site portion of Covey Road easement, provides a total of ~~121~~ 100 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. 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.8~~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, 3, and ~~4~~3 would be required along AA 7. A ~~100~~50-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. In addition, mitigation measure 3 requires installation of a fence along the northern portion of this AA where there is no existing fence. 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 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, 3, and 4 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 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 2, 3, and 4 would be required along AA 8. Implementation of these mitigation measures would effectively serve to provide adequate separation of 100 feet between the on- and off-site uses to assure compatibility both to and from the off-site operation. Mitigation measure 3 would require fencing to provide further buffering and separation. 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 and 4 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). Mitigation measure 2 provides for a 50-foot agricultural buffer that would contain one row of trees and portions of the proposed Covey Lane. In addition, ~~to~~ a ~~100~~50-foot agricultural LBZ is proposed at this location, adjacent to the agricultural buffer. ~~there would be an~~ An additional physical buffer resulting from the realignment of the 32-foot Covey Lane (see Figure 16g) would be provided by the existing, off-site Covey Lane; however, the off-site Covey lane is not included in the buffer width. 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 16g, mitigation measures 2, 3, and 4 would be implemented requiring ~~both~~ the 50-foot buffer, a fence separating the existing Covey Lane from the realigned Covey Lane, and ~~additional~~ restrictions on the placement of structures within the 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 of ~~ranging from~~ 100~~6 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 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). 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 2, 3, and 4 would be required along AA 10. In addition, there is ~~a~~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 and 4 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 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. 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 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. The agricultural buffer for AA 13 includes only one row of trees due to constraints that restrict the planting of trees within the existing VCMWD utility easement; however, the overall width would be 50 feet, including the separation offered by the existing Rodriguez Road. Mitigation measure 3 would require installation of a fence along the eastern boundary of Rodriguez Road. 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 LBZ incorporated

within the project design, which would address potentially significant internal interface impacts. Subchapter 3.3 below includes mitigation measure 5, which would serve to reduce significant urban/agricultural compatibility impacts resulting from residential uses of early phases being constructed adjacent to ongoing agriculture of subsequent phases.

3.2.3.7 Other Compatibility Issues

Other edge effects 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) 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 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 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-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 would reduce impacts to less than significant.

- Invasive pests and pets – Adjacent development could affect existing agricultural operations through the introduction of new pests and domestic 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 and 3. In addition, a project design feature would ensure that HOA managed fruit trees would be managed to prevent breeding of pests. 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 and 3 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 equestrian/hiking trails are located within areas containing orchards, particularly avocado trees, and 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 and 3. 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, 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. 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. Some research also suggests that night lighting could affect the behavior of moths; however, few studies have examined the effects of artificial lighting on moths and none have measured effects on moth populations (Rich and Longcore 2006). 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~~ 8 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.

All 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 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, 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, 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 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, 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. .

- Mitigation measure 4, requiring additional restrictions applied within the existing 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 5 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.

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

- All fruit trees within common areas shall be managed using best practices to avoid breeding of pests that could cause economic damage to agricultural crops. The HOA shall allow placement of traps by the Agriculture, Weights and Measures Pest Detection Program within common areas. Ripe fruit should be harvested and not allowed to drop. Citrus trees planted in common areas shall be managed for prevention of the Asian citrus psyllid, as detailed below:

    - Plant trees from reputable, licensed California nurseries and use only registered budwood that comes with source documentation.
    - Conduct regular inspections for Asian citrus psyllid and Huanglongbing.
    - Dry or double bag plant clippings with evidence of Asian citrus psyllid and/or Huanglongbing infestation prior to disposal.

Overall, implementation of the project's PDCs and mitigation measures 2 through 5 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 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 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. This buffer shall be required at AA 3, AA 4, AA 5, AA 6, AA 7, AA 8, AA 9, AA 10, AA 13, and adjacent to interim on-site agricultural activities, with the exception that AA 3, AA 4, AA 9, and AA 13 would provide less than two rows of trees due to site constraints as detailed in Figures 16a, 16b, 16g, and 16i.

Specific to the agricultural buffer provided in AA 6 (Impact AG-2), Canary Island Pines shall be planted among the tree crops to further reduce any potential pesticide drift that may occur between the existing adjacent agricultural use and the proposed project's park and school sites. The Canary Island Pine is a fast-growing pine that grows 60-80 feet tall, has needles (which are more efficient at removing small drifting droplets from the air than smooth leaves), and has low water needs. The pines shall be 36- to 48-inch boxed trees placed consistent with accepted practice that optimizes porosity and maximizes pesticide drift interception, with buffer density at approximately 30 to 50 percent and tree spacing at approximately 15-20 feet.

Mitigation Measure 3: 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 4: A Limited Building Zone shall prohibit 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 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 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 5: An interim 100-foot limited building zone shall be required between ongoing agricultural uses and residential development for each phase of development . ~~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.~~

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 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 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 be complementary to the architecture and land uses throughout the project area. Community lighting shall 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 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.

PDC-4 All fruit trees within common areas shall be managed using best practices to avoid breeding of pests that could cause economic damage to agricultural crops. The HOA shall allow placement of traps by the Agriculture, Weights and Measures Pest Detection Program within common areas. Ripe fruit should be harvested and not allowed to drop. Citrus trees planted in common areas shall be managed for prevention of the Asian citrus psyllid, as detailed below:

- Plant trees from reputable, licensed California nurseries and use only registered budwood that comes with source documentation.
- Conduct regular inspections for Asian citrus psyllid and Huanglongbing.

- o Dry or double bag plant clippings with evidence of Asian citrus psyllid and/or Huanglongbing infestation prior to disposal.

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, in the form of a 50-foot-wide agricultural compatibility buffer planted with two rows of orchard trees or one row where constraints exist, 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 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 AA~~s~~ 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. AA 4 and AA 13 would also provide one row of trees where constraints exist; however, the overall buffer width would provide adequate separation between land uses. Mitigation measure 2 further requires that the AA-6 agricultural buffer be planted with Canary Island Pines among the tree crops in order to provide additional buffer between the existing adjacent agricultural use and the proposed park and school sites. The Canary Island Pine is a fast--growing pine that grows 60-80 feet tall, has needles (which are more efficient at removing small drifting droplets from the air than smooth leaves), and low water needs. The mitigation measure requires that the pines be placed in a manner that optimizes porosity and maximizes pesticide drift interception. Mitigation measure 3 requiring a 6-foot-high masonry fence to be constructed and maintained would protect off-site agricultural uses from intrusions from the proposed project at locations AAs 3 through 10 and 13. Mitigation measure 4 requiring restrictions placed within the LBZs prohibiting all structures or features that could attract residents or children would be incorporated at AAs 3, 4, 6 through 10, and 13.

In determining the appropriate buffer widths to be applied, the County reviewed and considered relevant studies, and the site specific conditions, including the literature review presented in Agricultural Buffer Criteria for the City of Arroyo Grande (Pennebaker 2009). The Pennebaker study was conducted to "evaluate agricultural buffer policies present in other jurisdictions throughout California and determine appropriate criteria for the construction and maintenance of an agricultural buffer in the City of Arroyo Grande." Based on this literature review, the County has determined that the recommended mitigation measures are adequate. In particular, the Pennebaker study indicates that minimum buffer widths can be as small as 10 feet, with maximum buffer widths ranging between 66 to 131 feet. The recommended mitigation measures would provide a minimum 50-foot agricultural buffer, including one to two rows of trees, and an additional buffer of varying

widths through implementation of a LBZ. As shown in the table below, the total buffer width at each AA where significant impacts were identified would range between 50 and 242 feet, with an average buffer width of approximately 100 feet. In addition, the resulting buffers would contain design elements advocated by all of the studies cited by Pennebaker including the use of trees, fences, trails, roadways, parks, and utility right-of-ways.

Mitigation measure 5 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. LBZ are proposed around the perimeter of the project site. All common area fruit trees would be managed to prevent the breeding of pests. These PDCs, in combination with the mitigation measures described above, would reduce 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.*

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 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.

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. As discussed in subchapter 3.2.3 above, the project would include mitigation measures 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.

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.

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. 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). 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.

Further, the project would include on-site biological open space, common open space, and LBZ, as well mitigation measures 2, 3, and 4, in order to ensure that urban/agriculture compatibility conflicts are less than significant. Accordingly, the project is consistent with LU-7.1.

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.*

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, 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.

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, the project includes Mitigation measures 2 through 4 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, 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 (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.

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. 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 through 4, 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 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~~RS) ~~Urban~~ Single-Family 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. 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 LBZ, as well as require the implementation of mitigation measure 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 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 LBZ, as well as mitigation measures 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.*

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 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 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 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.

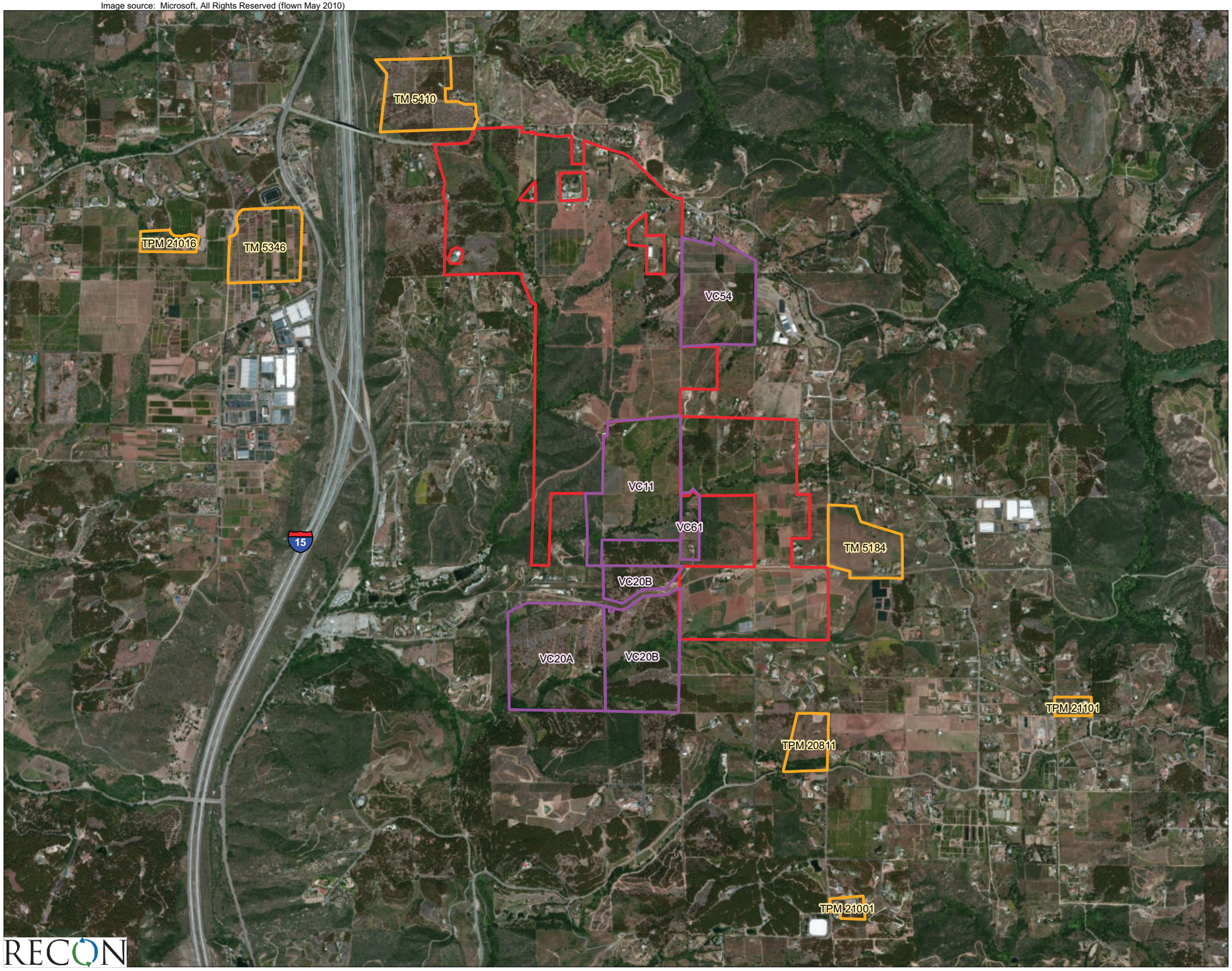
A list of projects with a summary of project features and agricultural resources is provided in Table 9. The cumulative agricultural effects of the project were evaluated, based on Table 9 and Figure 17.

TABLE 9
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.
GANGAVALLIP M 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.

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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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.

As shown in Table 10, the twelve cumulative projects (including five PSRs) together contain 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 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 5,627 acres of important farmland (or 3,557 if excluding Other Land); and the project's impacts would represent conversion of 11 percent of the study area total (or 14 percent if excluding Other Land).

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; the project's incremental contribution to a significant cumulative impact would also be significant.

TABLE 10
ACRES OF FMMP FARMLAND WITHIN THE CUMULATIVE PROJECT AREA

Category	Project Acres	Cumulative Projects	Total Cumulative	Regional Cumulative Study Area Total	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 Williamson Act Contract Lands

None of the projects in the cumulative study area are identified as having direct project impacts to a Williamson Act Contract or as being located within an agricultural preserve. 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. 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 would be reduced to less than significant with the implementation of the mitigation measures 2 and 3 and the PDCs proposed for this project. The cumulative projects having similar indirect impacts as the 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, 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.

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. No significant cumulative impacts would result from the project in association with Williamson Act Contracted lands or due to urban/agriculture interface conflicts. 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.

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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 contain significant agricultural resources. Further, the direct impact to 43.8 acres of Prime and Statewide Importance soils was determined to be 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.

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 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 2, 3, and 4.

Mitigation measure 5 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. 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; and that the project's incremental contribution to this impact would 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.

C. The applicant may choose to mitigate for 43.8 acres of Prime and Statewide Importance soils through a combination of options 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 Mitigation for Indirect Impacts – Compatibility

Mitigation Measure 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 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: 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: A Limited Building Zone shall prohibit 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 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 Mitigation for Indirect Impacts - Interim Phasing

Mitigation Measure 5: 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 the County Agricultural, Weights and Measures Regulations.

6.2.4 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 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 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 shall be complementary to the architecture and land uses throughout the project area. Community lighting shall be designed to provide adequate illumination for safety, security, and architectural accents without over lighting. Light fixtures shall direct light to use areas and avoid light intrusion into adjacent agricultural and other land use areas. Light shields 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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ATTACHMENT A

LARA Model Analysis

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Attachment A
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. The 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 occur as a series in 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.

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). 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 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 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.

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 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 that 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 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 (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 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 considered an important agricultural resource. The results of the model analysis, which are discussed above, are summarized in Table A-8 below. Table A-8 shows that the site received a 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,. Since two out of the three Required Factors are rated high and one was rated Moderate, the Complementary Factors were also analyzed pursuant to 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, this result would place the project within Scenario 2, which means that the site is **an important agricultural resource**.

TABLE A-8
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 A-9
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		

ATTACHMENT B

PACE Program Information

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Purchase of Agricultural Conservation Easement (PACE) Program

County of San Diego

Planning & Development Services

September 2014

Table of Contents

I. Pilot Phase Overview

On August 3, 2011 (1), the Board of Supervisors (Board) directed staff to develop a pilot Purchase of Agricultural Conservation Easement Program (PACE Program) as a component of the County's General Plan Implementation Plan. Under the PACE Program, willing agricultural property owners are compensated for placing a permanent conservation easement on their agricultural property that limits future uses to agriculture and extinguishes future development potential. As a result, agricultural land is preserved and the compensation received makes the property's continued use more viable over the long term.

The Program is intended to promote the long-term preservation of agricultural land in the County, while compensating agricultural property owners for perceived equity loss resulting from the County's General Plan Update. The Program is based on the framework of what is traditionally referred to as a "purchase of development rights" program. The Program was initially implemented on a limited scale as a pilot project, but is now a permanent County program with the goal of preserving agricultural resources throughout the unincorporated area of San Diego County.

A. Pilot Phase Application Periods

A primary challenge in implementing the pilot phase was developing public awareness and assessing overall interest in Program participation. County staff implemented a marketing effort in Fall 2011 to overcome these challenges. Over 7,000 notices were mailed to potentially eligible property owners. These notices also invited property owners to participate in an online survey. Data collected from the surveys were used to assess Program interest and evaluate preliminary property data from potential applicants. Marketing efforts also included the development of a PACE webpage and establishment of an informational hotline that fielded over 500 calls.

A formal PACE application period for the pilot phase was held from January 16, 2012, through March 1, 2012. All eligible property owners were invited to participate in the pilot phase, and a total of 60 property owners applied. Table 1 summarizes the property characteristics of the applications received.

Table 1 – PACE Pilot Program Data

# of Applications Received	60
# of Ranching Properties	5
# of Agricultural Properties	51
# of Ranching and Agricultural Properties	4
Average Parcel Size	81 acres
Total Acreage Eligible for PACE	1,870 acres
Average Density Reduction (Dwelling Units)	6.3 DU
Average Density Reduction (%)	64%

B. Pilot Phase Acquisition History

The Board allocated $2 million to implement the PACE pilot phase in the Fiscal Year 2012-2013 Operational Plan. On July 17, 2013 (5), the Board approved the acquisition of five agricultural conservation easements covering a total area of 738 acres for $1,694,000, plus $212,000 for expenses related to appraisals and administrative costs, for a total of $1,906,000.

The Board allocated an additional $620,000 in Fiscal Year 2013-2014 to extend easement offers to the three remaining properties from the pilot phase. These three properties, which ranked eighth, ninth, and tenth among the top ten PACE properties,

were appraised but were not extended offers in the initial phase due to funding limitations. With the additional funding provided by the Board, agricultural conservation easement offers were extended to the three property owners in August 2013. Only one owner of a 44-acre property accepted the County's offer. The other two owners elected to not participate in the PACE Program.

In total, the PACE pilot phase permanently protected 782 acres of ranch and farmland through the acquisition of agricultural conservation easements exceeding the pilot phase acquisition goal of 500 acres.

On December 4, 2013, (3) the Board received a report and presentation from staff detailing the opportunities and challenges realized during the pilot phase's implementation as well as an analysis of Program demand and property characteristics of interested Program participants. In response, the Board directed staff to pursue the acquisition of 16 remaining properties deemed eligible for participation during the pilot phase of the Program but not processed for acquisition due to funding limitations. In addition, the Board directed staff to:

1) Establish PACE as a permanent County program;
2) Provide for continuous funding of the PACE Program through annual General Fund appropriations in addition to funding through mitigation;
3) Periodically reopen the PACE application process to interested property owners; and
4) Prepare a mitigation program as an expanded component of the PACE Program.

In response, the Program Guidelines have been updated to implement PACE as a permanent program and to include the mitigation component as part of the PACE Program.

On September 17, 2014, the Board will consider acquisition of agricultural conservation easements from eight of the remaining 16 eligible property owners. The value of the eight easement acquisitions is $1,319,850, with $125,150 for related administrative, title, and escrow costs, for a total of $1,445,000. The easements totaled 413.82 acres.

II. Purpose and Intent

The purpose and intent of the Program is to:

1) Promote the long-term preservation of agriculture in the County of San Diego;
2) Establish provisions for the acquisition and long-term oversight of agricultural conservation easements;
3) Establish an additional mitigation measure for development projects impacting agricultural resources; and
4) Satisfy General Plan Implementation Measure 5.3.1.F.