

4.2 Agricultural Resources

This section of the EIR describes and evaluates the potential impacts to agricultural resources that could result from implementation of the proposed project. This section is based on the information provided by the City of Escondido, the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), the County of San Diego Department of Agriculture, Weights and Measures (AWM)), and other sources, as cited throughout the document.

A summary of the impacts to agricultural resources identified in Section 4.2.3, Analysis of Project Impacts and Determination of Significance, is provided below.

Agricultural Resources Summary of Impacts

Issue Number	Issue Topic	Project Direct Impact	Project Cumulative Impact	Impact After Mitigation
1	Conversion of Agricultural Resources	Less than Significant	Less than Significant	Less than Significant
2	Land Use Conflicts	Less than Significant	Less than Significant	Less than Significant
3	Indirect Conversion of Agricultural Resources	Less than Significant	Less than Significant	Less than Significant

4.2.1 Existing Conditions

The following section discusses the existing agricultural resources within the proposed project area, including crop types, Farmland Mapping and Monitoring Program lands, agricultural soils, and Williamson Act Contract Lands.

4.2.1.1 Agricultural Resources

The County of San Diego Agriculture, Weights and Measures department tracks agricultural information on a County-wide scale and does not track agricultural information on a local jurisdictional scale. For this reason, the following discussion provides information on the agricultural operations within the County of San Diego, including the proposed project area.

Within the proposed project area, there are approximately 75 to 100 active agricultural operations. The high cost of water and land make farming in San Diego County expensive and encourages growers to raise products with a high dollar value per acre. San Diego produces the highest dollar value per acre of any county in California. The median size farms are just four acres, yet San Diego County's farmers rank number one in both California and the nation in the production value of nursery, floriculture and avocados. Statewide San Diego County is in the top five counties for cucumbers, mushrooms, tomatoes, boysenberries and strawberries, grapefruit, Valencia oranges, tangelos and tangerines, honey, and eggs. Avocados, citrus crops and ornamental trees and shrubs are found throughout the proposed project area. In 2009, San Diego County had an unprecedented five Mediterranean fruit fly quarantines. Escondido area farmers were especially hard hit with the area quarantines. Table 4.2-1, Examples of Existing Agricultural Operations in the Proposed Project Area Vicinity, below identifies some existing agricultural operations that represent examples of active agricultural operations in the proposed project area.

Table 4.2-1 Examples of Existing Agricultural Operations in the Proposed Project Area Vicinity

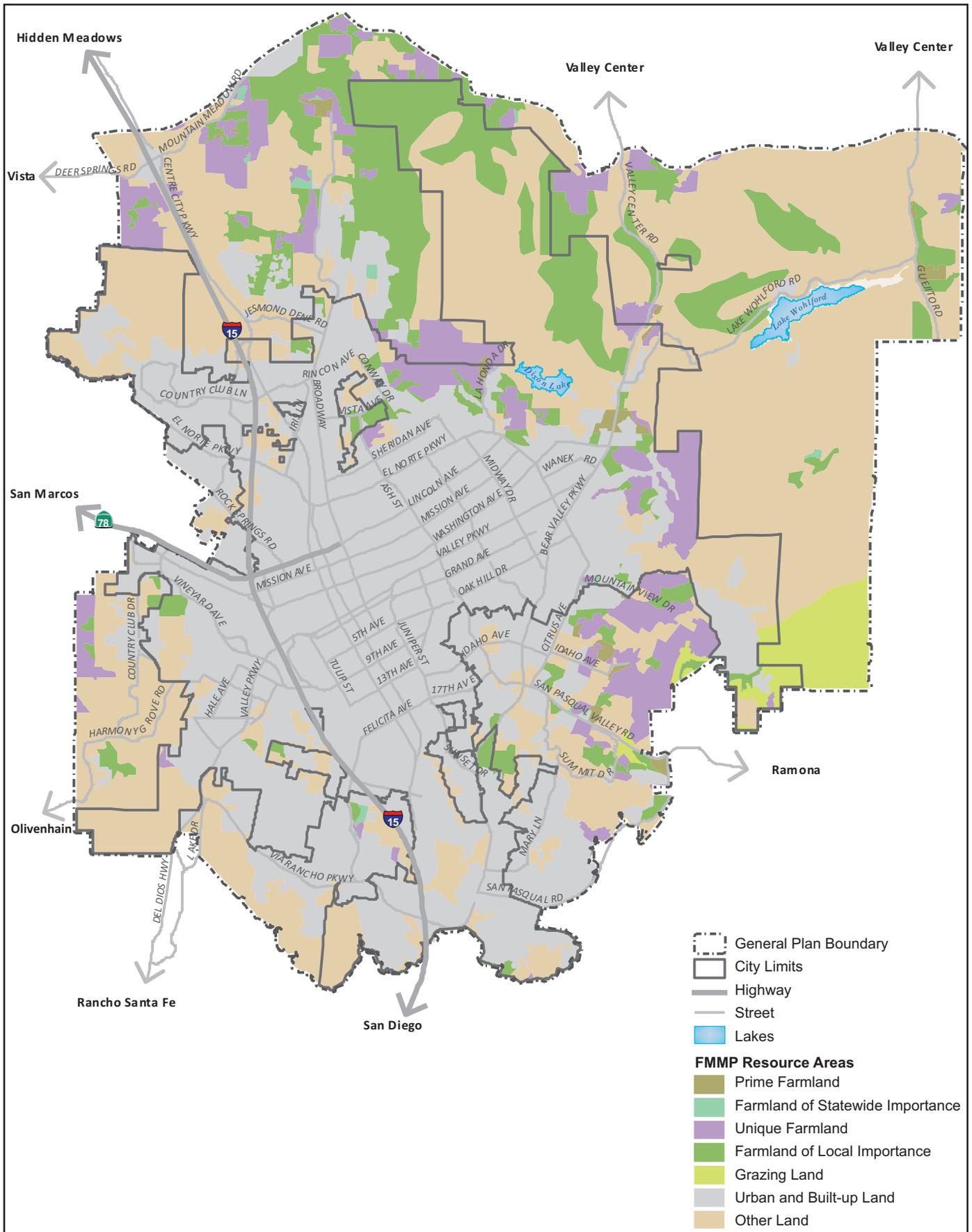
Agricultural Operation	Crops	Location
Be Wise Ranch	Organic tomatoes, organic strawberries, organic cucumbers, and organic zucchini	20505 San Pasqual Road, Escondido, CA 92025
Hidden Villa Ranch	Egg and egg products	2900 Harmony Grove Road, Escondido, CA 92029
Harmony Egg Ranch	Egg and egg products	2075 Country Club Drive, Escondido, CA 92029
Witman Ranch Inc	Citrus	16789 San Pasqual Valley Road, Escondido, CA 92027
Fluegge Egg Ranch	Egg and egg products	24120 Crown Hill Lane, Escondido, CA 92027
Watson Farms Llama Ranch	Llama and livestock grooming	1984 Greenview Road, Escondido, CA 92026
Las Pilitas	California native plants	8331 Nelson Way, Escondido, CA 92026
El Plantio Nursery and Landscaping	Perennials, hangings plants, shrubs, shade trees, and bonsai trees	1322 San Pasqual Valley Road, Escondido, CA 92027
Evergreen Nursery	Shrubs, trees, vines, fruit trees and citrus, palms, cactus, and succulents	12460 Highland Valley Road, Escondido, CA 92025
Big Trees Nursery	Oak trees, native trees, olive trees, conifer trees, deciduous trees, and flowering trees	12450 Highland Valley Road, Escondido, 92025
Tropic World Nursery	Bougainvillea, palms, cycads, bamboo, cactus, succulents, roses, fruit trees, water plants, California natives and protea	26437 North Centre City Parkway, Escondido, CA 92026
Plant World Nursery Inc	Shrubs, trees, and nursery plants	26334 Mesa Rock Road, Escondido, CA 92026

Source: Atkins 2011c

Farmland Mapping and Monitoring Program

CEQA Statute Section 21060.1 references maps produced by the California DOC FMMP as a resource that may be used to identify agricultural resources. The FMMP produces maps and statistical data used for analyzing impacts to California's agricultural resources and uses a 10 acre minimum mapping unit to determine farmland resources. Agricultural land is rated according to soil quality and irrigation status, with the best quality land labeled Prime Farmland. FMMP maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. Table 4.2-2, FMMP Farmland Categories, below provides the definition of different agricultural land categories used in FMMP land classification.

Figure 4.2-1, FMMP Resources, and below in Table 4.2-3, FMMP Resources, identify FMMP resources throughout the proposed project area. As shown in this figure, the majority of the proposed project area, or approximately 40,049 acres, is classified as Urban and Built-up or Other Land. The FMMP defines Urban and Built-up land as land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Other Lands consist of areas not included in any other mapping category such as low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres.



Source: City of Escondido 2011



FMP RESOURCES
FIGURE 4.2-1

Table 4.2-2 FMMP Farmland Categories

Category	Definition
Prime Farmland	Land with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
Farmland of Statewide Importance	Land similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the last FMMP mapping date.
Unique Farmland	Land of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
Farmland of Local Importance	Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In San Diego County, this category is defined as land that meets all the characteristics of Prime and Statewide, with the exception of irrigation. They are farmlands not covered by the above categories but are of significant economic importance to the county. They have a history of good production for locally adapted crops. The soils are grouped in types that are suited for truck crops (such as tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce, and cauliflower) and soils suited for orchard crops (avocados and citrus).
Grazing Land	Land on which the existing vegetation is suited to the grazing of livestock. It has a minimum mapping unit of 40 acres.
Urban and Built-up Land	Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
Other Land	Land not included in any other mapping category such as low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.
Water Area	Perennial water bodies with an extent of at least 40 acres.

Source: DLRP 2008

Table 4.2-3 FMMP Resources

FMMP Farmland Category	Total Acreage in Project Area
Prime Farmland	251
Farmland of Statewide Importance	92
Unique Farmland	3,352
Farmland of Local Importance	5,604
Grazing Land	958
Urban and Built-up Land	19,580
Other Land	20,469
Water Area	298

Source: City of Escondido 2011

As depicted above in Figure 4.2-1, FMMP Resources, outside of the areas identified as Urban and Built-up or Other Land, multiple areas within the proposed project planning boundary are classified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance and Grazing Lands. The majority of these FMMP resources are located outside of the City's jurisdictional boundaries, within the City's Sphere of Influence (SOI) and along the periphery of the proposed planning area. Land with the best combination of physical and chemical features able to sustain long term agricultural production is considered Prime Farmland. As shown above in Table 4.2-3, FMMP Resources, approximately 251 acres of Prime Farmland occurs within the proposed project area. Farmland of Statewide Importance includes land similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Approximately 92 acres of Farmland of Statewide Importance occur within the proposed project area. Unique Farmland consists of lesser quality soils used for the production of the state's leading agricultural crops and includes land that has been cropped at some time during the four years prior to the mapping date. Approximately 3,352 acres of Unique Farmland are present within the proposed project area. Farmland of Local Importance is land that meets all the characteristics of Prime Farmland and Farmland of Statewide Importance, with the exception of irrigation. Approximately 5,604 acres of Farmland of Local Importance occur within the proposed project area. Grazing Lands include land on which the existing vegetation is suited to the grazing of livestock. Approximately 958 acres of grazing land occur within the proposed project area.

Agricultural Soils

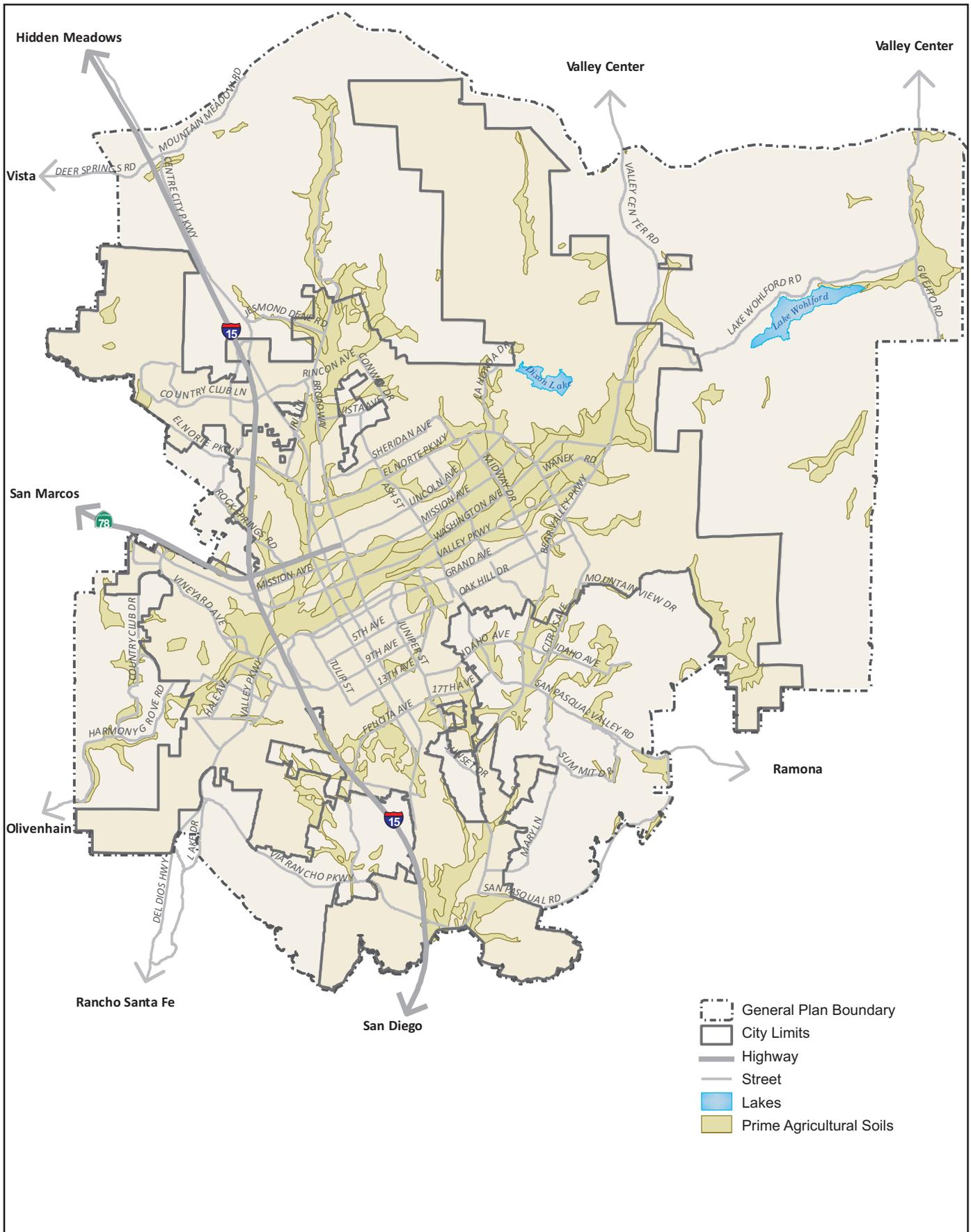
Prime Agricultural Soils

Soils in the San Diego region are generally considered poor, with only six percent of the region's soils considered prime agricultural land, as defined by Government Code Section 51201 (The Williamson Act). Soil quality measures typically rate local soils as poor because of the region's generally steep terrain and erodible soils. Descriptions of various measures of soil quality are presented below. These classifications are based on the U.S. Department of Agriculture (USDA) Soil Surveys: Parts I & II (USDA 1973), and the County of San Diego Soil Interpretation Manual, Part III (DPLU 1975).

The locations of prime agricultural soils within the proposed project area are identified below in Figure 4.2-2, Prime Agricultural Soils, and below in Table 4.2-4, Prime Agricultural Soils within the Proposed Project Area, identifies the types of prime agricultural soils found within the proposed project area. As shown in this figure, prime agricultural soils are primarily concentrated around natural watercourses and drainages, such as Escondido Creek. In total, approximately 6,978 acres of prime agricultural soil exist within the proposed project area. Prime soil types within the proposed project area include auld clay, chino fine sandy loam, chino silt loam saline, Fallbrook sandy loam, Grangeville fine sandy loam, Greenfield sandy loam, Ramona sandy loam, reiff fine sandy loam, Visalia sandy loam and wyman loam.

Land Capability Classification

Land Capability Classification (LCC) classifies soils according to their limitations when cultivated and according to the way that they respond to management practices. Class I soils have no significant limitation for raising crops. Classes VI through VIII have severe limitations, limiting or precluding their use for agriculture. Capability subclasses are also assigned by adding a small letter to the class designation. Capability subclasses include the letters e, w, s, or c. The letter e indicates that the main limitation is risk of erosion. The letter w indicates that water in or on the soil interferes with plant growth or cultivation. The letter s indicates that the soil is limited mainly because it is shallow,



Source: City of Escondido 2011



ATKINS

PRIME AGRICULTURAL SOILS
FIGURE 4.2-2

droughty, or stony. Finally, the letter c is used only in some parts of the U.S. where cold or dry climates are a concern. Groupings are made according to the limitation of the soils when used to grow crops and the risk of damage to soils when they are used in agriculture. Productive agriculture typically occurs on soils having LCC ratings of III and IV, and a significant number of local soils have the class designations e and s indicating limitations related to erosion and shallow soils.

Table 4.2-4 Prime Agricultural Soils within the Proposed Project Area

Soil Type	Acres
Auld clay	46
Chino fine sandy loam	20
Chino silt loam saline	152
Fallbrook sandy loam	314
Grangeville fine sandy loam	228
Greenfield sandy loam	357
Ramona sandy loam	2,393
Reiff fine sandy loam	479
Visalia sandy loam	2,917
Wyman loam	72
Total	6,978

Source: City of Escondido 2011

Storie Index

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

Williamson Act Contract Lands

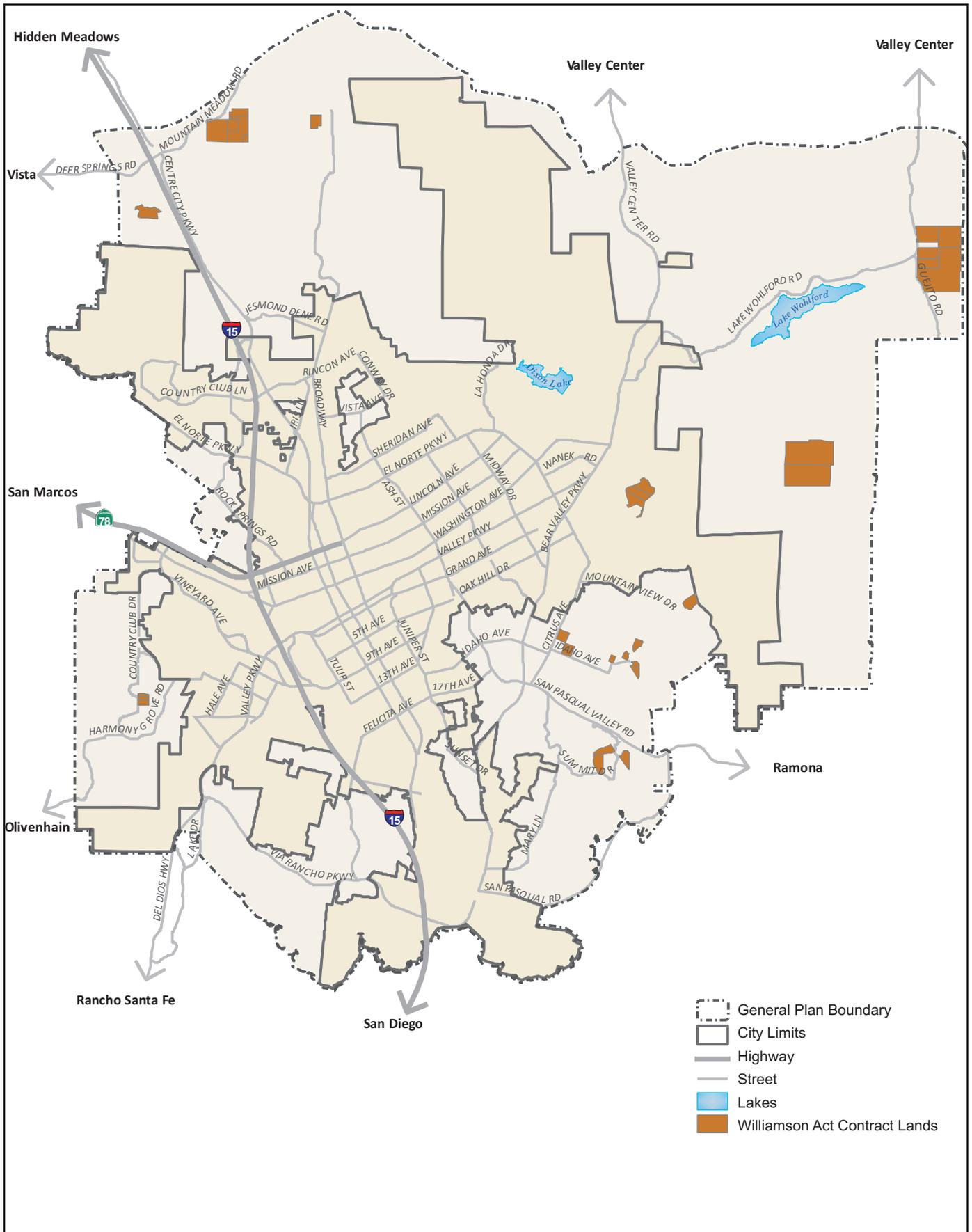
The Williamson Act has been the state's premier agricultural land protection program since its enactment in 1965. This Act was passed to preserve agricultural and open space lands by discouraging premature and unnecessary conversion to urban uses. As reported in the California DOC 2010 Williamson Act Status Report, in 2009, 15 million acres were enrolled under the Williamson Act statewide (DOC 2011). Table 4.2-5, Williamson Act Contract Lands within Proposed Project Area, below identifies 704 acres of land currently under Williamson Act Contract in the proposed project area.

Figure 4.2-3, Williamson Act Contract Lands, identifies the location of Williamson Act Contract lands within the proposed project area. As shown in this figure, Williamson Act Contract lands are generally scattered around the eastern and periphery locations of the project area.

Table 4.2-5 Williamson Act Contract Lands within Proposed Project Area

Site Name	Prime Farmland?	Acres Under Contract
Aldridge	Yes	10
Ayala	Yes	41
Benedict	No	20
Boucher	Yes	16
Bousema	Yes	10
Buskirk	Yes	3
Ehmcke	yes	31
Haskell	Yes	41
Haskell	No	120
Hawthorne	Yes	10
Hillebrecht	Yes	10
Houtman	Yes	11
Johnson F.	No	21
Johnson J.	Yes	6
Katheiser	Yes	14
Kent	Yes	15
Prior	Yes	3
Reed	Yes	12
Sanders	Yes	20
Stickley	Yes	55
Szemenyei	Yes	12
Tate	Yes	3
Thomas	Yes	5
Vaden	Yes	16
Westby F.	Yes	16
Westby M.	No	86
Wireman	Yes	97
Total		704

Source: City of Escondido 2011



Source: City of Escondido 2011



WILLIAMSON ACT CONTRACT LANDS
FIGURE 4.2-3

4.2.1.2 Forest Lands

The California Department of Forestry and Fire Protection (CalFire) operates eight Demonstration State Forests totaling 71,000 acres. These forests represent the most common forest types in the state. The state forests grow approximately 75 million board feet yearly and harvest an average of 30 million board feet of timber each year, enough to build 3,000 single family homes. There are no state forests within the proposed project area and no lands are currently used for timber production or management in the proposed project area (CalFire 2011).

The proposed project area contains potential forestry resources, as shown below in Figure 4.2-4, Potential Forest Resources. In total, approximately 4,945 acres of potential forest resources are present within the proposed project area, as shown below in Table 4.2-6, Potential Forest Resources. Of this total acreage, approximately 4,734 acres of forest resources are under the jurisdiction of the City. The remaining 211 acres of forest resources are under the jurisdiction of the U.S. Forest Service, within the Daley Ranch area. Potential forest resources include coast live oak woodland and Engelmann oak woodland habitat that generally surrounds the City's landholdings of Daley Ranch and Lake Wohlford.

Table 4.2-6 Potential Forest Resources

Potential Forest Resource	Acreage
City of Escondido	4,734
US Forest Service	211
Total	4,945

Source: City of Escondido 2011

4.2.2 Regulatory Framework

4.2.2.1 Federal

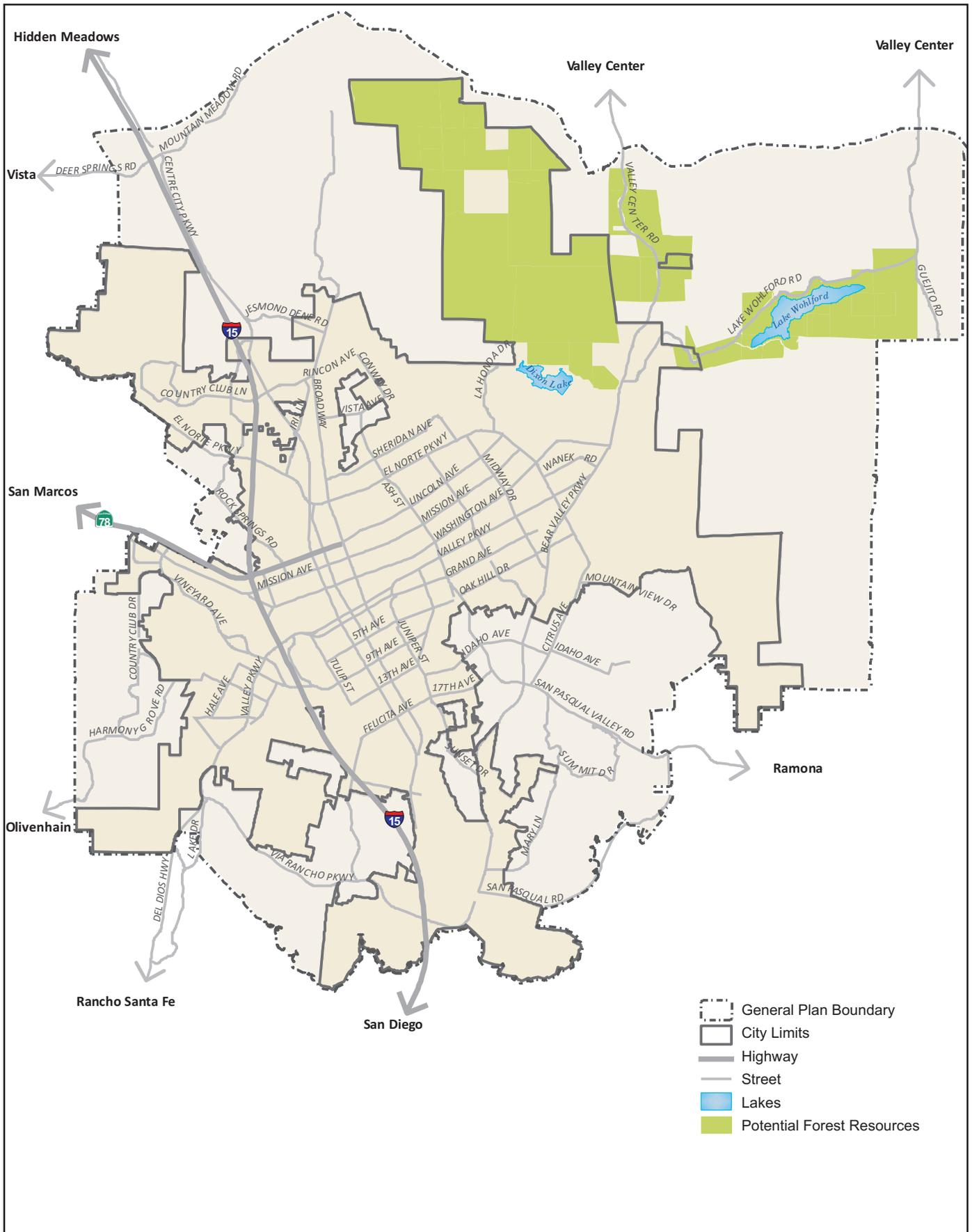
Farmland Protection Policy Act

The USDA administers the Farmland Protection Policy Act of 1981. The Act is intended to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses. The act also requires these programs to be compatible with state, local, and private efforts to protect farmland.

4.2.2.2 State

California Civil Code Section 3482.5 (The Right to Farm Act)

The Right to Farm Act is designed to protect commercial agricultural operations from nuisance complaints that may arise when an agricultural operation is conducting business in a "manner consistent with proper and accepted customs." The code specifies that established operations that have been in business for three or more years that were not nuisances at the time they began shall not be considered a nuisance as a result of a new land use.



Source: City of Escondido 2011



**POTENTIAL FOREST RESOURCES
FIGURE 4.2-4**

California Farmland Conservancy Program

Implemented by the California Department of Conservation, the California Farmland Conservancy Program (CFCP) is a voluntary program that seeks to encourage the long-term, private stewardship of agricultural lands through the use of agricultural conservation easements. The CFCP, formerly known as the Agricultural Land Stewardship Program, was created in 1996, and provides grant funding for projects that use and support agricultural conservation easements for the protection of agricultural lands.

California Land Conservation Act (Williamson Act)

The Williamson Act of 1965 was designed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The program requires a 10-year contract between a City or County and a land owner. While in contract, the land is taxed on the basis of its agricultural use rather than its market value. The land becomes subject to certain enforceable restrictions, and certain conditions need to be met prior to approval of an agreement. The goal of the Williamson Act is to protect agriculture and open space.

California Land Evaluation Site Assessment Model

The USDA NRCS developed the California Land Evaluation Site Assessment Model (LESA) to assist state and local officials to make sound decisions about land use. Combined with forest measures and rangeland parameters, LESA can provide a technical framework to numerically rank land parcels through local resource evaluation. In determining whether impacts to agricultural resources are significant environmental effects, the CEQA Guidelines reference the California Agricultural LESA Model prepared by the DOC, as an optional methodology that may be used to assess the relative value of agriculture and farmland. The California Agricultural LESA Model evaluates soil resource quality, project size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The project score then becomes the basis for making a determination of a project's potential significance. The California Department of Conservation encourages local agencies to develop local agricultural models to account for the variability of local agricultural resources and conditions.

California Government Code Section 56064

California Government Code Section 56064 defines prime agricultural land as an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA NRCS land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- b) Land that qualifies for rating 80 through 100 Storie Index Rating.
- c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.

- d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.
- e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.

Government Code Section 56668(e)

Government Code Section 56668(e) identifies factors to be considered in the review of a proposed project or proposed action. Government Code Section 56668(e) specifically requires the evaluation of the effects of the proposed project or action on maintaining the physical and economic integrity of agricultural lands, as defined by Section 56016 of the Code.

Government Code Section 56016

Government Code Section 56016 defines ‘agricultural lands’ as land currently used for the purpose of producing an agricultural commodity for commercial purposes, land left fallow under a crop rotational program, or land enrolled in an agricultural subsidy or set-aside program.

Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 established procedures for local government changes of organization, including city incorporates, annexations to a city or special district, and city and special district consolidations. This act requires that development or use of land be guided away from existing prime agricultural lands in open-space use toward areas containing nonprime agricultural lands, unless the action would not promote the planned, orderly, efficient development of an area.

Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP), established in 1982, produces maps and statistical data used for analyzing impacts to California’s agricultural resources. Agricultural land is rated according to soil quality and irrigation status, with the best quality land called Prime Farmland. Maps are updated every two years, with current land use information gathered from aerial photographs, a computer mapping system, public review, and field reconnaissance. The minimum mapping unit is 10 acres. The DOC Prime Farmlands, Farmlands of Statewide Importance, and Unique Farmlands are referenced in the CEQA Guidelines, Appendix G, as resources to consider in an evaluation of agricultural impacts.

Farm and Ranch Lands Protection Program

The Farm and Ranch Lands Protection Program (FRPP) is a voluntary program that helps farmers and ranchers keep their land in agriculture. The program provides matching funds to state, tribal or local governments and non-governmental organizations with existing farm and ranch land protection programs to purchase conservation easements. FRPP is reauthorized in the Farm Security and Rural

Investment Act of 2002. The USDA Natural Resources Conservation Service (USDA 2008c) manages the program.

Open Space Subvention Act

The Open Space Subvention Act (OSSA) was enacted on January 1, 1972, to provide for the partial replacement of local property tax revenue foregone as a result of participation in the Williamson Act and other enforceable open space restriction programs (Government Code Section 16140 et seq.). Participating local governments receive annual payment on the basis of the quantity (number of acres) and quality (soil type and agricultural productivity).

4.2.2.3 Regional/Local

San Diego Local Agency Formation Commission Legislative Policy L-101

San Diego Local Agency Formation Commission (LAFCO) Policy L-101, Preservation of Open Space and Agricultural Lands, guides development away from prime agricultural lands, unless that action would not promote the planned, orderly and efficient development of an area, and encourages development of existing vacant or non-prime agricultural lands within a jurisdiction before approving any proposal that would allow development of open-space lands outside of an agency's area. LAFCO Policy L-101 also: a) discourages proposals that would convert prime agricultural or open space lands to other uses unless the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use; b) requires rezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development; and c) provides adopted procedures to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.

4.2.3 Analysis of Project Impacts and Determination of Significance

4.2.3.1 Issue 1: Direct Conversion of Agricultural Resources

Guidelines for Determination of Significance

Based upon Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would convert an agricultural resource or other agricultural resource, to a non-agricultural use. A significant impact would also occur if the proposed project would substantially impair the ongoing viability of important agricultural resources.

Agricultural resources are defined by the City as areas identified by the FMMP as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance or Grazing Land. For the purpose of this analysis, the definition of agricultural resources has been expanded to include lands identified as a statutory priority of the San Diego LAFCO for the preservation of agricultural lands. San Diego LAFCO defines agricultural lands consistent with California Government Code Section 56064,

which defines prime agricultural land as an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- a) Land that qualifies, if irrigated, for rating as Class I Or Class II in the USDA NRCS land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- b) Land that qualifies for rating 80 through 100 Storie Index Rating.
- c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the USDA in the National Range and Pasture Handbook, Revision 1, December 2003.
- d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a non-bearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than \$400 per acre.
- e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than \$400 per acre for three of the previous five calendar years.

Impact Analysis

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Due to its existing urban setting and highly developed condition, the Downtown Specific Plan area offers limited opportunities for agricultural resources. Impacts related to implementation of the E-CAP are discussed separately below.

General Plan Update and Downtown Specific Plan Update

As shown above in Table 4.2-3, FMMP Resources, approximately 10,257 acres of FMMP Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance and Grazing Land occur within the proposed project area. The conversion of agricultural resources to non-agricultural land uses would result in a direct impact to agriculture by significantly reducing or eliminating the productive capacity of the land. The FMMP produces maps and statistical data used for analyzing impacts to California's agricultural resources but does not account for agricultural production that operates on less than 10 acres of land. The majority of farms within the proposed project area and the region are located on less than 10 acres of land while the median size of an active agricultural farm in the area is four acres. Due to the regional trend of small acreage farms and the relatively high density of existing development within the proposed project area, it is reasonable to assume that a majority of the existing agricultural operations within the proposed project area are less than 10 areas in size (AWM 2009). Therefore, FMMP data may not accurately account for the smaller agricultural operations, such as nurseries that produce container crops, which are active with the proposed project area. For this reason, the following impact analysis has expanded to include all potential agricultural resources within the proposed project area, including agricultural resources as defined by the San Diego LAFCO.

Agricultural acreage has been declining over the past three decades (DLRP 2008). However, agriculture continues to be a vital component of the San Diego region's economy, including the proposed project

area. This is due, in part, to the many small farms in the area that produce high value crops. The agricultural trend of producing high value crops on small amounts of land has allowed local farmers to continue economically productive operations, despite the land use pressures discussed above. Agriculture is still prominent within the proposed project area, primarily within the terminus of the City's rail line and within higher elevations in outlying City areas. As stated in the Resource Conservation Element of the proposed General Plan Update, agriculture remains an important component in the local economy of the Escondido area and its operation provides an important visual amenity that gives Escondido its unique character. Many residents expressed a desire to maintain agricultural opportunities when planning for the community's future. Escondido's founding is closely tied to agriculture, which sustained the community and its economy for decades. Consequently, its role as a land use is important in retaining community character.

Not all agricultural resources within the proposed project area are in active operation. Some agricultural resources include lands that are available and suitable for agricultural use, although they may not be in current agricultural use. Both active and inactive agricultural resources have been included in this analysis to provide a broad picture of the potential agricultural resources that exist within the proposed project area.

The existing City of Escondido General Plan (1990) allows agricultural uses within the Rural I, Rural II, Estate I and Estate II land use designations. The proposed General Plan Update identifies three land use designations that would allow for agricultural operations, including: Rural I, Rural II and Estate I. Land use designation Rural I identifies rural living environments in areas of agricultural production, rugged terrain, and/or environmentally constrained lands that are the most remote from urban development. Land use designation Rural II allows for agricultural operations and designates a rural living environment in areas of agricultural production or rugged terrain that is remote from urban development. The Estate I land use designation allows agricultural properties as large-lot, spaced, single family development in areas bordering land designated as rural. The Estate I land use designation has an associated zoning of Residential Estate (R-E). The purpose of the R-E zone is to provide an area to be developed exclusively for single family dwellings in a rural setting while providing provisions for the maintenance of limited agricultural pursuits. The Rural I and Rural II land use designations have an associated zoning of Residential Agriculture (R-A). The R-A Zone allows 1 dwelling unit per 5 acres and is designed to protect agricultural uses from encroachment by urban users until residential, commercial or industrial uses in such areas become necessary or desired.

In order to evaluate the potential impact that the proposed General Plan Update and Downtown Specific Plan Update would have on agricultural resources, an analysis of proposed land use designations that would be placed on areas currently allowing agricultural uses has been prepared. For the purpose of this analysis, it is assumed that a direct impact to agricultural resources would occur if a land use designation that currently allows for agricultural operations (i.e. Rural I, Rural II, Estate I and Estate II) would be designated under the proposed General Plan Update as an employment land use or as a residential land use that would not accommodate agricultural operations. Employment land use categories proposed under the General Plan Update include the following: General Commercial, Neighborhood Commercial, Planned Commercial, Planned Commercial/Mixed Use, Light Industrial, Planned Industrial, General Office, Planned Office, Downtown SPA, ERTC North and South SPAs, and Imperial Oaks SPA. Residential land uses proposed under the General Plan Update that would not accommodate agricultural operations include: Estate II, Suburban, Urban I, Urban II, Urban II, Urban IV, and Urban V. Alternatively, under the proposed General Plan Update, an expansion of agricultural

resources would occur if an existing employment land use would be designated as Estate I, Rural I or Rural II.

Figure 4.2-5, Agricultural Resources, identifies areas within the proposed project area that currently allow agricultural resources and would allow agricultural resources to occur under implementation of the General Plan Update. Table 4.2-7, General Plan Update Direct Agricultural Impacts, identifies direct agricultural impacts that may occur upon implementation of the General Plan Update. As shown in this table, implementation of the proposed General Plan Update would result in the direct conversion of approximately 1,846 acres of agricultural land and an expansion of approximately 2,176 acres of agricultural resources. Although implementation of the proposed General Plan Update would result in the expansion of agricultural resources, which would potentially off-set agricultural resources impacts, the potential loss of 1,846 acres of agricultural resources would be considered a significant impact.

Table 4.2-7 General Plan Update Direct Agricultural Impacts

Agricultural Impact	Acreage
Reduction (Rural I, Rural II or Estate I to employment or high density residential land use)	1,846
Expansion (Employment or high density residential land use to Rural I, Rural II or Estate I)	2,176
Total Direct Conversion (Reduction areas only)	1,846

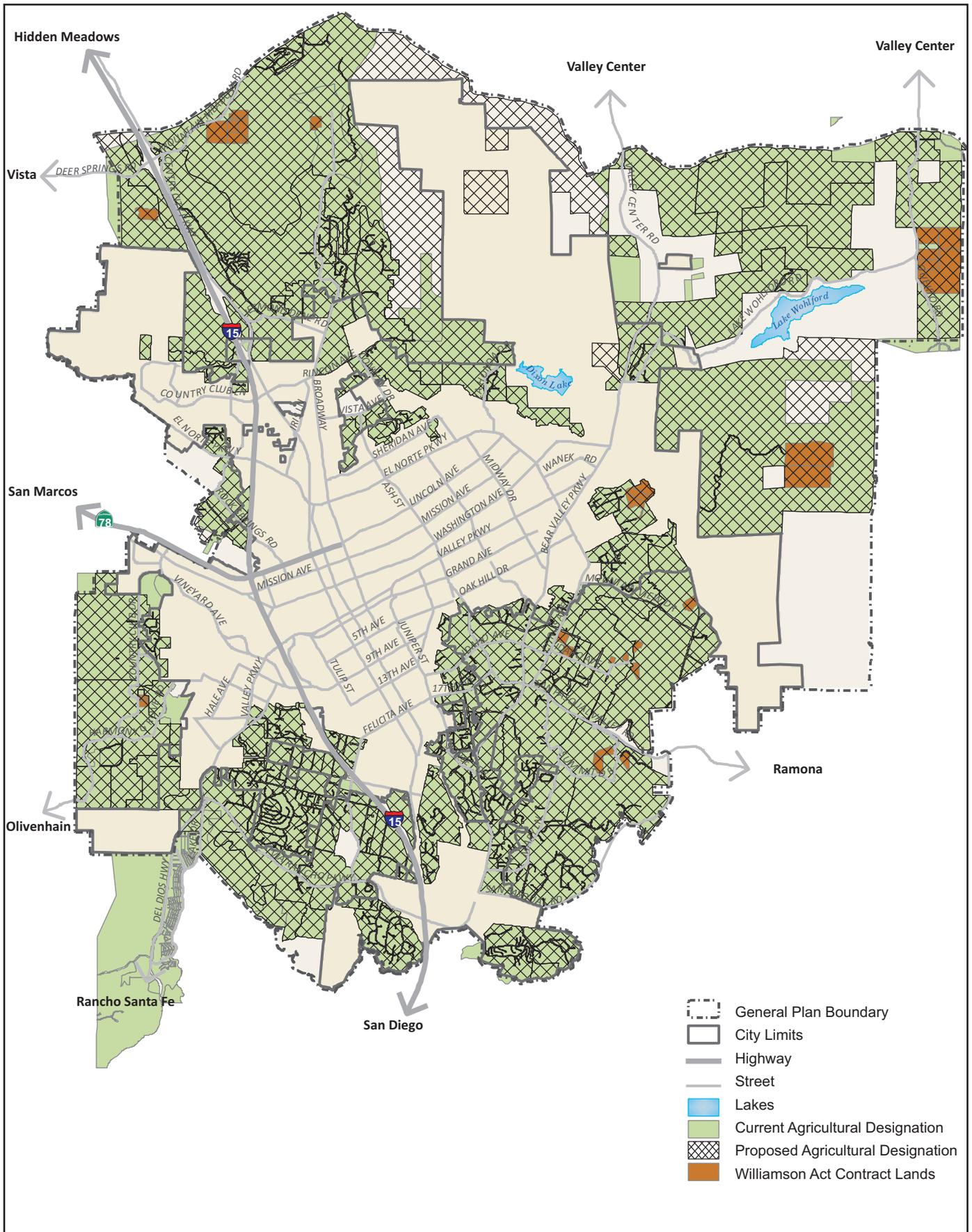
Note: Employment land use categories include: General Commercial, Neighborhood Commercial, Planned Commercial, Planned Commercial/Mixed Use, Light Industrial, Planned Industrial, General Office, Planned Office, Downtown SPA, ERTC North and ERTC South SPAs, and Imperial Oaks SPA.

High density residential land use categories include: Estate II, Suburban, Urban I, Urban II, Urban III, Urban IV, and Urban V.

Source: City of Escondido 2011

In addition to the direct conversion of agricultural resources, land use/agricultural interface issues often arise from dust, noise, liability concerns, trespassing, theft, competition for water, traffic, pest introduction and conflicts with pesticide use. The type of agricultural use and the sensitivity of the nearby land uses are a key factor in agricultural compatibility. Indirect impacts from land use/agricultural interface issues are discussed below in Section 4.2.3.3, Issue 3: Indirect Conversion of Agricultural Resources.

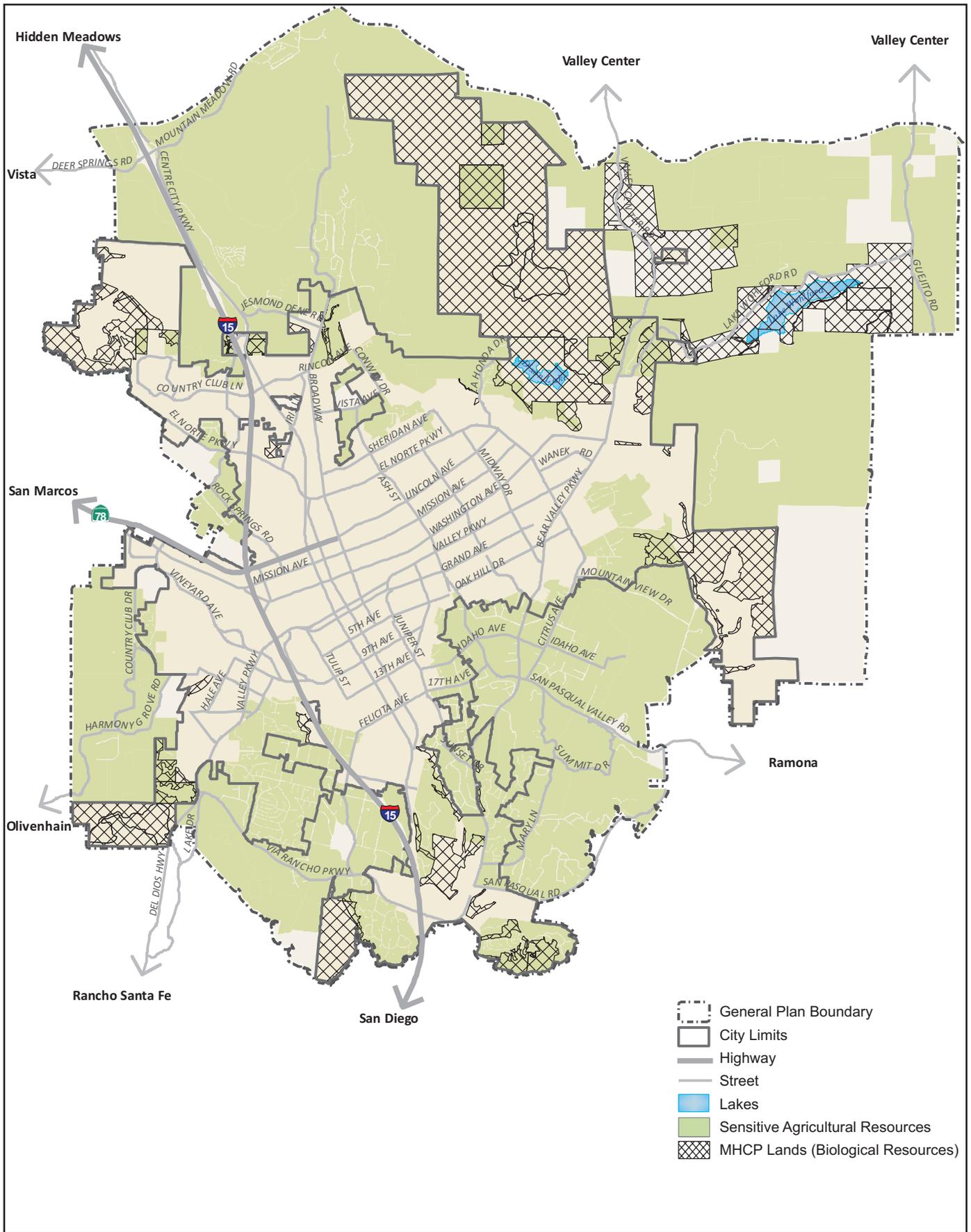
In rare cases, sensitive biological resources, such as those occurring within the Multiple Habitat Conservation Program (MHCP) areas would prohibit agricultural operations, such as grazing, in favor of biological preservation. Figure 4.2-6, Sensitive Agricultural and Biological Resources, identifies the agricultural resources within the proposed project area in relation to MHCP resources within the proposed project area. As shown in this figure, the majority of biological preservation areas do not occur in areas containing existing agricultural resources. Under implementation of the proposed General Plan Update, land uses in existing MHCP areas would generally not change. Therefore, the designation of MHCP areas in areas containing existing agricultural resources would not represent a direct conversion.



Source: City of Escondido 2011

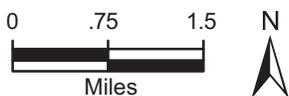


AGRICULTURAL RESOURCES
FIGURE 4.2-5



Source: City of Escondido 2011

ATKINS



**SENSITIVE AGRICULTURAL AND
BIOLOGICAL RESOURCES
FIGURE 4.2-6**

Escondido Climate Action Plan

Implementation of the reduction measures identified in the E-CAP would not result in any new development or the construction of facilities beyond what is allowable under the proposed General Plan Update and Downtown Specific Plan Update. Infrastructure improvements proposed by reduction measures R1-E4, Electricity Energy Efficiency, and R1-E5, Natural Gas Energy Efficiency, include energy efficiency measures that can be applied to existing agricultural operations within the proposed project areas. These reduction measures do not propose the actual construction of land uses that would result in the indirect conversion of agricultural resources. Therefore, implementation of the E-CAP would not result in the direct conversion of agricultural resources to non-agricultural resources. E-CAP impacts would be less than significant.

Federal, State and Local Regulations and Existing Regulatory Processes

As identified above in Section 4.2.2, Regulatory Framework, there are a number of federal, state, and local regulations, programs and policies in place to protect agricultural resources from conversion. These include the Williamson Act, CFCP, OSSA, FMMP, FRPP, and LAFCO Policy L-101. Density and lot size restrictions also play a significant role in preserving agricultural resources by limiting the amount of development that can occur in a given area. These restrictions and other zoning regulations also help to maintain the character of areas and minimize development pressures on agricultural lands. However, these regulations can also result in the conversion of agricultural resources by allowing substantial development on and/or adjacent to agricultural lands.

Proposed General Plan Update Policies

The proposed General Plan Update contains policies within the Resource Conservation Element, Community Protection Element, Community Health and Services Element, and Land Use Element that would preserve existing agricultural resources and promote the agricultural industry to ensure the long term-viability of agricultural resources.

Quality of life standard #9, air quality, promotes local agriculture because it requires the City to establish a Climate Action Plan with feasible and appropriate local policies and measures, one of which is to promote local agriculture. Similarly, Air Quality and Climate Protection Policy 6.1 in the Resource Conservation Element requires the E-CAP to establish policies and measures to promote local agriculture.

Within the Resource Conservation Element, Hillside and Ridgeline Policy 3.10 allows development on intermediate ridges only in association with the preservation of significant open space, habitat, cultural resources and agricultural resources. Cultural and Agricultural Policy 4.6 would maintain large-lot residential land uses with appropriate zoning designations in areas compatible with preserving agricultural productivity. Cultural and Agricultural Policy 4.7 requires buffers for agricultural lands from more intensive urban uses with intermediate land uses that are mutually compatible. Cultural and Agricultural Policy 4.8 requires a variety of techniques to be explored to preserve existing agricultural lands, including agricultural land trusts, transfer of development rights, 'right to farm' in open space areas, and physical separation and screening of agricultural and non-agricultural operations to minimize urban/agricultural conflicts. Cultural and Agricultural Policies 4.9 and 4.10 encourage the use of reclaimed water for irrigation and support the operation of certified farmers markets.

Within the Community Protection Element, Flood Protection Policy 6.3 discourages all development within 100-year floodplains, excluding agricultural, outdoor recreation and natural resource areas. Within the Community Health and Services Element, Health and Wellness Policy 1.8 allows the creation and operation of community gardens, urban farms and farmers markets.

Proposed Downtown Specific Plan Update Policies

The proposed Downtown Specific Plan Update does not include any policies related to agricultural resources.

Proposed Escondido Climate Action Plan Reduction Measures

Within the proposed E-CAP, reduction measures R1-E4, Electricity Energy Efficiency, and R1-E5, Natural Gas Energy Efficiency, promote agricultural efficiency initiatives within the proposed project area to reduce agricultural-related greenhouse gas (GHG) emissions.

Summary

Although implementation of the proposed General Plan Update and Downtown Specific Plan Update would result in some expansion of agricultural resources, the potential conversion of a total of 3,546 acres of agricultural resources would be considered a significant impact. However, the proposed General Plan Update provides multiple policies within various elements that promote the preservation of agricultural operations within the project area. Further, the E-CAP provides additional measures that encourage agricultural efficiency within the proposed project area. With implementation of the identified General Plan policies and E-CAP measures, the proposed project would result in a less than significant impact related to the direct conversion of agricultural resources to non agricultural uses.

4.2.3.2 Issue 2: Land Use Conflicts

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would conflict with a Williamson Act Contract or the provisions of the California Land Conservation Act of 1965. Additionally, a significant impact would occur if the proposed project would conflict with existing zoning for agricultural use.

Impact Analysis

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Due to its existing urban setting and highly developed condition, the Downtown Specific Plan area offers limited opportunities for agricultural resources. Impacts related to implementation of the E-CAP are discussed separately below.

General Plan Update and Downtown Specific Plan Update

Williamson Act Contracts

Within the proposed project area, there are approximately 704 total acres of land under an existing Williamson Act Contract. As part of the General Plan Update, the existing agricultural preserve areas

within the proposed project area would not change and agricultural preserve land would continue to be eligible to enter into Williamson Act Contract. Under implementation of the General Plan Update, none of the existing Williamson Act contract lands would be required to go into non-renewal or cancellation status. Therefore, the General Plan Update would result in less than significant impacts related to Williamson Act Contract conflicts.

Agricultural Zoning

The City's Zoning Code allows agriculture as a permitted use in Rural I, Rural II and Estate I zones (R-A and R-E). The City recognizes the needs of farm workers and allows farm worker housing to be partially provided through provisions in the Zoning Ordinance. The City allows, as a permitted use in agricultural, rural and estate residential zones, living quarters for persons employed on the premises in conjunction with authorized agricultural uses. Dwellings serving six or fewer employees are considered single family dwellings and those serving more than six are permitted by right.

In addition to housing farm workers on the work-site, affordable housing is available for permanent farm workers in multi-family zones. Specifically, the City completed the development of eight units for farm workers as part of a 24-unit affordable housing complex for low income households in 2001. The project is located at 1801–1821 South Escondido Boulevard and is called Eucalyptus View Cooperative Apartments. The development provides 23 units of affordable housing to families earning less than 50 percent of the area median income. The unit mix includes four one-bedroom units, 11 two-bedroom units and eight three-bedroom units. As a limited-equity cooperative, Eucalyptus View provides a form of home ownership. The initial share prices are equivalent to what is typically required for rent and security deposits for a rental unit. Long-term affordability is guaranteed and resale prices are limited to a percentage of annual increases in the equity investment.

Implementation of the proposed General Plan Update and Downtown Specific Plan Update do not include direct modifications to existing zoning designations; however, zoning designations would be made consistent with the General Plan land use designations following adoption of the proposed General Plan Update. Any revisions to the City's zoning ordinance, required from the proposed General Plan Update, and would still allow permitted agricultural uses within the Rural I, Rural II and Estate I land use areas under zoning R-A and R-E, and farm worker housing in multi-family zones. Therefore, implementation of the proposed General Plan Update and Downtown Specific Plan Update would not conflict with agricultural zoning.

Escondido Climate Action Plan

Implementation of the reduction measures identified in the E-CAP would not result in any new development or the construction of facilities beyond what is allowable under the proposed General Plan Update and Downtown Specific Plan Update. Therefore, implementation of the E-CAP would not result in an increase in population or development within the General Plan Update area or result in land use changes that would conflict with Williamson Act Contracts or agricultural zoning. Rather, the E-CAP contains reduction measures that encourage agricultural efficiency within the proposed project area. Therefore, implementation of the E-CAP would not result in an agricultural land use conflict.

Federal, State and Local Regulations and Existing Regulatory Processes

As identified above in Section 4.2.2, Regulatory Framework, multiple regulations exist to preserve agricultural areas in the City, including Williamson Act, CFCP, OSSA, FMMP, FRPP, and LAFCO Policy L-

101. Projects that are subject to discretionary review by the City are also reviewed for Williamson Act Contract conflicts based on CEQA Guidelines Section 15317. These guidelines require that the evaluation extends to areas adjacent to Williamson Act Contract lands, as well as the lands under contract.

Proposed General Plan Update Policies

Proposed General Plan Update policies that would preserve existing agricultural resources and promote the agricultural industry to ensure the long term-viability of agricultural resources are identified above in Section 4.2.3.1, Issue 1: Direct Conversion of Agricultural Resources.

Proposed Downtown Specific Plan Update Policies

The proposed Downtown Specific Plan Update does not include any policies related to Williamson Act Contracts or agricultural zoning.

Proposed Escondido Climate Action Plan Reduction Measures

Within the proposed E-CAP, reduction measures R1-E4, Electricity Energy Efficiency, and R1-E5, Natural Gas Energy Efficiency, promote agricultural efficiency initiatives within the proposed project area to reduce agricultural-related GHG.

Summary

Implementation of the proposed General Plan Update would not result in changes to existing agricultural preserve areas and would not impact any existing Williamson Act Contract lands. Additionally, implementation of the General Plan Update would not result in any land use changes that would conflict with zoning requirements for agriculture. Further, the General Plan Update and E-CAP include multiple policies and measures that promote local agriculture and agricultural efficiency. Therefore, impacts related to agricultural land use conflicts would be less than significant.

4.2.3.3 Issue 3: Indirect Conversion of Agricultural Resources

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would involve other changes in the existing environment which, due to their location or nature, could result in conversion of an agricultural resource to non-agricultural use. A potentially significant indirect impact to an agricultural resource would occur if proposed land uses would result in compatibility conflicts with existing agricultural activities.

Impact Analysis

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Due to its existing urban setting and highly developed condition, the Downtown Specific Plan area offers limited opportunities for agricultural resources. Impacts related to implementation of the E-CAP are discussed separately below.

General Plan Update and Downtown Specific Plan Update

Land uses proposed near an active agricultural use have the potential to cause the conversion of agricultural resources to non-agricultural uses because of the potential incompatibility between the proposed use and existing agricultural activity. Adverse impacts caused by incompatible development near agricultural uses would include, but not be limited to: farm practice complaints; pesticide use limitations; liability concerns; economic instability caused by urbanization and changing land values; trespassing, theft, and vandalism; damage to equipment, crops, and livestock; introduction of urban use pollutants entering farm water sources; competition for water; development affecting recharge of groundwater; soil erosion and storm water runoff emanating from urban use; shading of crops from inappropriate buffering; importation of pests and weeds from urban areas or introduced pest populations from unmaintained landscaping; increased traffic; effects of nighttime lighting on growth patterns of greenhouse crops; and interruption of cold air drainage.

Implementation of the proposed General Plan Update would increase density within the vicinity of some agricultural operations while continuing to allow for agricultural operations to exist within the Rural I, Rural II and Estate I land use designations. The majority of land uses proposed under the General Plan Update and within areas containing agricultural resources would be low density in nature and would not be expected to result in indirect conflicts with agricultural operations. As shown above in Figure 4.2-5, Agricultural Resources, the majority of existing agricultural resources within the proposed project planning area are located outside of the City of Escondido's jurisdictional boundaries, primarily along the periphery of the proposed project area within the SOI. When compared to Figure 3-4, Proposed Land Uses, the majority of areas containing agricultural resources within the proposed project area would be designated for Rural I, Rural II, Estate I Estate II, and Public Land/Open Space land uses under implementation of the General Plan Update. Implementation of the proposed General Plan Update would also direct population growth into 'smart growth' areas, consistent with the policies included in the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, which requires that development of land for uses other than open-space be guided away from existing prime agricultural lands. Implementation of the General Plan Update would direct development into appropriate areas; thereby reducing the potential for the indirect conversion of agricultural resources to occur.

Escondido Climate Action Plan

Implementation of the reduction measures identified in the E-CAP would not result in any new development or the construction of facilities beyond what is allowable under the proposed General Plan Update and Downtown Specific Plan Update. Infrastructure improvements proposed by reduction measures R1-E4, Electricity Energy Efficiency, and R1-E5, Natural Gas Energy Efficiency, include energy efficiency measures that can be applied to existing agricultural operations within the proposed project area. These reduction measures do not propose the actual construction of land uses that would result in the indirect conversion of agricultural resources. Therefore, implementation of the E-CAP would not result in the indirect conversion of agricultural resources to non-agricultural resources. E-CAP impacts would be less than significant.

Federal, State and Local Regulations and Existing Regulatory Processes

Federal, state, and local regulations that protect agricultural lands from conversion, both direct and indirect, are summarized above in Section 4.2.3.1, Issue 1: Direct Conversion of Agricultural Resources.

Proposed General Plan Update Policies

Proposed General Plan Update policies that protect agricultural lands from conversion, both direct and indirect, are summarized above in Section 4.2.3.1, Issue 1: Direct Conversion of Agricultural Resources.

Proposed Downtown Specific Plan Update Policies

The proposed Downtown Specific Plan Update does not include any policies related to agricultural resources.

Proposed Escondido Climate Action Plan Reduction Measures

Within the proposed E-CAP, reduction measures R1-E4, Electricity Energy Efficiency, and R1-E5, Natural Gas Energy Efficiency, promote agricultural efficiency initiatives within the proposed project area to reduce agricultural-related GHG emissions.

Summary

Implementation of the identified General Plan Update policies and smart growth planning strategies would reduce the potential for agricultural resources to be converted to non-agricultural resources. Impacts would be less than significant impact.

4.2.4 Cumulative Impacts

The geographic scope for cumulative analysis of agricultural resources includes the entire County of San Diego, including incorporated and unincorporated areas.

Issue 1: Direct Conversion of Agricultural Resources

In general, agricultural resources are in decline in the San Diego region. This decline can be attributed, in part, to the increasing population in the region and subsequent pressures that would require the direct conversion of lands supporting agricultural resources to be converted to non-agricultural uses. Cumulative projects in the incorporated cities and unincorporated county would have the potential to convert agricultural lands and resources to non-agricultural uses from the development of agricultural incompatible land uses, such as commercial, industrial or high density residential. Therefore, cumulative projects would result in a potentially significant impact related to the direct conversion of agricultural resources in the San Diego region.

As discussed above, implementation of the proposed project would result in less than significant impacts related to the direct conversion of agricultural resources due to the policies and reduction measures proposed in the General Plan Update and E-CAP. Therefore, in combination with other cumulative projects, the proposed project would not have a cumulatively considerable contribution to a regionally significant impact related to the direct conversion of agricultural land.

Issue 2: Land Use Conflicts

Within the San Diego region, incorporated cities (including Escondido) and the unincorporated County designate and adopt agricultural preserves, enter into Williamson Act Contracts and adopt agricultural zoning to protect their agricultural resources. Additionally, multiple regulations exist to preserve

agricultural areas in the region, including CFCP, OSSA, FMMP, FRPP, and LAFCO Policy L-101. Projects that are subject to discretionary review by the City are also reviewed for Williamson Act Contract conflicts based on CEQA Guidelines Section 15317, which requires the analysis of impacts to agricultural lands. Any identified impacts to agricultural resources from cumulative projects would be mitigated to a level below significant. With these regulations in place, cumulative projects occurring in the San Diego region would not result in conflicts with existing agricultural zoning or Williamson Act Contracts. Therefore, cumulative projects, in combination with the proposed project, would not result in a potentially significant impact related to agricultural land use conflicts.

Issue 3: Indirect Conversion of Agricultural Resources

Within the San Diego region, the indirect conversion of farmland is increasing due to population growth and the subsequent development required to support this growth. Land use conflicts often arise from increased agricultural/urban interface areas, high operating costs, and escalating property values. These conflicts have the potential to occur in incorporated cities (including Escondido) and the unincorporated county. Similar to the proposed project, cumulative projects resulting in urban development are anticipated to indirectly affect the viability of agricultural resources in the region by increasing conflicts related to urban/agricultural interfaces and increasing land values, which would result in a potentially significant cumulative impact. Implementation of the proposed project would result in less than significant impacts related to an indirect conversion of agricultural resources. In combination with other cumulative projects, the proposed project would not result in a cumulatively considerable contribution to a regionally significant impact to the indirect conversion of agricultural land.

4.2.5 Significance of Impact Prior to Mitigation

Prior to mitigation, the proposed project would result in less than significant direct and cumulative impacts regarding direct and indirect conversion of agricultural resources to non-agricultural uses and land use conflicts with agricultural zoning or Williamson Act Contract lands.

4.2.6 Mitigation

Issue 1: Conversion of Agricultural Resources

The proposed General Plan Update and E-CAP policies and reduction measures would self-mitigate direct and cumulative impacts related to the conversion of agricultural resources to a level below significant. No mitigation is required.

Issue 2: Land Use Conflicts

The proposed project would have a less than significant impact related to land use conflicts. No mitigation is required.

Issue 3: Indirect Conversion of Agricultural Resources

The proposed General Plan Update and E-CAP policies and reduction measures would self-mitigate direct and cumulative impacts related to the indirect conversion of agricultural resources to a level below significant. No mitigation is required.

4.2.7 Conclusion

The discussion below provides a synopsis of the conclusion reached in each of the above impact analyses.

Issue 1: Conversion of Agricultural Resources

Implementation of the proposed General Plan Update would result in the potential direct conversion of 1,846 acres of agricultural resources. However, the proposed General Plan Update provides multiple policies within various elements that promote preservation and encourage agriculture uses within the project area. Additionally, the E-CAP provides reduction measures that encourage agricultural efficiencies. Implementation of the proposed General Plan Update and E-CAP would prevent the proposed project from resulting in a significant impact related to the direct conversion of agricultural resources. The proposed project, in combination with other cumulative projects, would not have a cumulatively considerable contribution to the regional loss of agricultural land.

Issue 2: Land Use Conflicts

Implementation of the proposed project would not result in changes to existing agricultural preserve areas and would not impact any land under an existing Williamson Act Contract. Additionally, zoning designations would be made consistent with the General Plan land use designations following adoption of the proposed General Plan Update. Any revisions to the City's Zoning Ordinance would still allow permitted agricultural uses within the Rural I, Rural II and Estate I designations in the areas zoned R-A and R-E, and farm worker housing in multi-family zones. Therefore, implementation of the proposed project would not result in any conflicts with zoning requirements for agriculture. Impacts related to agricultural land use conflicts would be less than significant. Further, the General Plan Update and E-CAP include multiple policies and reduction measures that promote agricultural efficiency. The proposed project would not contribute to a potentially significant cumulative impact associated with conflicts with agricultural zoning or Williamson Act Contract lands.

Issue 3: Indirect Conversion of Agricultural Resources

Implementation of the identified General Plan Update policies and smart growth planning strategies would reduce the potential for agricultural resources to be converted to non-agricultural uses. Therefore, impacts related to the indirect conversion of agricultural resources would be less than significant. The proposed project would not have a cumulatively considerable contribution to a potentially significant cumulative impact associated with the indirect conversion of agricultural land.

This page intentionally left blank.