

COUNTY OF SAN DIEGO

GUIDELINES FOR DETERMINING SIGNIFICANCE
AND
REPORT FORMAT AND CONTENT REQUIREMENTS

AGRICULTURAL RESOURCES



LAND USE AND ENVIRONMENT GROUP

Department of Planning and Land Use
Department of Public Works

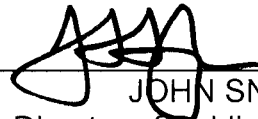
March 19, 2007

APPROVAL

I hereby certify that these **Guidelines for Determining Significance and Report Format and Content Requirements for Agricultural Resources** are a part of the County of San Diego, Land Use and Environment Group's Guidelines for Determining Significance and Technical Report Format and Content Requirements and were considered by the Director of Planning and Land Use, in coordination with the Director of Public Works on the 19th day of March, 2007.



GARY PRYOR
Director of Planning and Land Use



JOHN SNYDER
Director of Public Works



Attest: ERIC GIBSON
Deputy Director of Planning and Land Use

I hereby certify that these **Guidelines for Determining Significance and Report Format and Content Requirements for Agricultural Resources** are a part of the County of San Diego, Land Use and Environment Group's Guidelines for Determining Significance and Technical Report Format and Content Requirements and have hereby been approved by the Deputy Chief Administrative Officer (DCAO) of the Land Use and Environment Group on the 19th day of March, 2007. The Director of Planning and Land Use is authorized to approve revisions to these Guidelines for Determining Significance and Report Format and Content Requirements for Agricultural Resources, except any revisions to the Guidelines for Determining Significance presented in Chapter 4.0 must be approved by the DCAO.

Approved, March 19, 2007



CHANDRA WALLAR
Deputy CAO

COUNTY OF SAN DIEGO
REPORT FORMAT AND CONTENT REQUIREMENTS
AGRICULTURAL RESOURCES



LAND USE AND ENVIRONMENT GROUP

Department of Planning and Land Use
Department of Public Works

March 19, 2007

PURPOSE

These Agricultural Report Format and Content Requirements provide guidance on conducting agricultural impact analyses and preparing reports for discretionary projects being processed by the Land Use and Environment Group. These guidelines are designed to:

1. Ensure the quality, accuracy and completeness of agricultural impact analyses.
2. Aid in staff's efficient and consistent review of agricultural impact analyses from different consultants.
3. Provide adequate information to make appropriate planning decisions and to make determinations regarding conformance with applicable regulations.
4. Increase the efficiency of the environmental review process and avoid unnecessary time delays.

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1.0 INTRODUCTION

This document provides guidance to County staff and consultants in the determination of the need for a technical study and in the preparation of technical studies for the environmental review of agricultural resources located within the jurisdiction of the County of San Diego. These format and content requirements and the guidance provided herein are based on a series of technical committee meetings with local agriculture and land use planning professionals. The intent of these guidelines is to ensure consistency in the environmental review of agricultural resources including identification, evaluation, and preservation or mitigation.

All agricultural resource reports shall follow the requirements in this document. The overall length of reports and the amount of information to include will vary depending on the size and scope of the project, the regional setting, the agricultural resources present onsite and in the surrounding area and the degree of impact involved.

2.0 REPORT FORMAT REQUIREMENTS

All written reports shall follow these general guidelines:

- Reports should be technical in nature and should avoid extraneous and repetitive information.
- All conclusions must be based on substantial evidence or reasonable assumptions as documented and justified in the report.
- Reports should be concise and written in a professional manner suitable for peer review. Staff may reject reports based on quality if the report is written in such a manner that an efficient and detailed review cannot be completed.
- Draft copies of the report shall have all changes made in response to staff comments in strikeout/underline form, unless an exception is granted by staff. Final copies of the report shall be clean, with all editing marks removed.

All agricultural resource reports will be reviewed for technical accuracy and completeness by a staff from the lead County department and may also be reviewed by staff from the County Department of Agriculture Weights and Measures (AWM). Reports are considered draft until County staff determines the report to be complete. Each submittal and review of a draft agricultural resource report is considered an "iteration." Staff will review each iteration and determine the report to be complete or respond with comments for necessary changes. The County expects that the first iteration will be as complete and comprehensive as possible; however, each report may have up to three iterations, after which project denial may be recommended due to inadequate environmental progress.

2.1 Outline

The sections of an Agricultural Resource Report are provided in the outline below.

AGRICULTURAL RESOURCES REPORT OUTLINE

COVER PAGE

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8.0 LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

TECHNICAL APPENDICES / ATTACHMENTS (if not included within body of the report)

- A. Maps and Figures and project plot plan/map (if not clearly shown on the agricultural resource map);**
- B. Vicinity and USGS topographic maps if not included elsewhere in the document.**
- C. Any other documents necessary to supplement the information provided within the agricultural report;**
- D. Agricultural Operator or Knowledgeable Person Interview Results (to assess potential indirect impacts to offsite operations);**
- E. LARA Model Instructions, when the LARA model is completed as part of the technical report, include as an attachment Section 3.1, LARA Model Instructions from the Agricultural Resources Guidelines for Determining Significance, and**
- F. Cumulative Project List, attach the cumulative project list.**

2.2 Content

COVER PAGE

The cover page shall include the following information:

- Project common name.
- Project numbers (i.e. TM, ZAP, etc.) including the environmental log number (ER).
- Date (original report date plus all revisions) must be revised during each iteration of the draft report).
- Name of Approved County CEQA Consultant preparing document, firm name (if applicable) and address.
- Signature of County Approved CEQA Consultant.
- Project proponent's name and address.
- The following statement: "Prepared for: The County of San Diego."

TABLE OF CONTENTS

The table of contents must follow the order and format outlined in this document with the exception that non-applicable sections should be excluded. Titles of each Appendix or Attachment should be listed in the order in which they are found in the document.

GLOSSARY OF TERMS AND ACRONYMS

Provide a list of terms and acronyms used in the report. Where terms are used that are defined within the Guidelines for Determining Significance for Agricultural Resources, those definitions should be used.

SUMMARY (ABSTRACT)

Provide a brief summary of the project, the agricultural resources present on and surrounding the site, including potential impacts and mitigation and/or project design elements proposed. No new information should be provided in the summary that is not further explained elsewhere in the document. The purpose of the summary is to provide a quick reference for the public and decision-makers. Therefore, the language should be less technical than that used in the remainder of the document.

1.0 *INTRODUCTION*

1.1 *Purpose of the Report*

Discuss the purpose of the report. Depending on the site location, the type of project, and the location and nature of the agricultural resources present, the purpose of the report may be one or a combination of the following:

- to determine the importance of onsite agricultural resources and assess the potential impacts to those resources
- to determine potential impacts to surrounding active agricultural operations and/or lands under a Williamson Act Contract
- to address consistency with General Plan policies pertaining to agriculture
- to determine the significance of cumulative impacts to agricultural resources
- to identify project design elements and/or mitigation measures that would minimize significant adverse effects

Where the purpose of the document does not include one of the above statements, it should not be included within the purpose statement. The information included in the project's scoping letter should provide guidance to identify the purpose of the report.

1.2 Project Location and Description

Project Location. Discuss the project location in the regional and local context. Include a USGS topographic map with the site and APN clearly identified as numbered figure(s).

Project Description. Provide a detailed description of the project, including all on-site and off-site components and design alternatives. An 8.5"x11" or 11"x17" copy of the plot plan/map must be included as one of the report figure(s). Describe the whole of the project considering the ultimate use of the site after the project is implemented. For example, a Tentative Map or Tentative Parcel Map proposes to subdivide property; however the project includes not only the division of parcels but also the grading of house pads, the construction of homes, and the construction of access roads. The project description should be as detailed as possible, including details such as:

- Size of project site and area proposed for development.
- Purpose and scale of proposed uses associated with the project.
- Proposed structures (size, location, purpose, etc.).
- Location of all existing easements, including those for biological open space, steep slope easements, limited building zone easements, utilities and roads.
- Location of proposed steep slope, biological, and cultural easements, limited building zone easements, fuel modification zones, and agricultural compatibility buffers.
- Location and purpose of existing structures and/or uses that will continue under the proposed action and identification of existing structures and/or uses that will be removed with the proposed action. If agricultural use is proposed to be retained, provide details of the project components that will facilitate it's continuation.
- Off-site improvements, such as for roads, utility extensions, or stormwater facilities.
- Description of any proposed rezones or variances.

- Description of any proposed Local Agency Formation Commission (LAFCO) action.
- Proposed site access.

1.3 Analysis Methods

Provide a discussion of the methods used to complete the technical study including interview results, site investigation findings, aerial photo interpretations and any other background research completed prior to preparation of the report. Examples of data sources include, but are not limited to the U.S. Department of Agriculture Soil Conservation Service Soil Surveys, the Department of Conservation FMMP Farmlands maps for San Diego County, the County AWM Annual Crop Statistics and Annual Reports, Phase I Environmental Site Assessments, pesticide use records from the County AWM, and previous agricultural resource reports prepared in the project area.

Discuss the methods used to map the onsite and/or surrounding agricultural resources such as field verification, aerial photo interpretation, FMMP maps, biological resources maps, County GIS data, etc.

1.4 Environmental Setting (Existing Conditions)

1.4.1 Regional Context

The geographic extent of the regional description will depend on the location of the project in relation to its surroundings. Community Plan boundaries are often appropriate boundaries for a regional context description if they are instructive in defining the boundary of the local agricultural community. For small or fragmented community plans, a wider regional context including areas with similar agricultural characteristics, connectivity, or history would be more appropriate. The regional context could serve as the area within which potential cumulative impacts would be considered if the area is representative of the area where similar agricultural impacts would occur. The following points should be included in a description of the regional context, as applicable:

- Generally describe the physical characteristics of the region including general topography, elevation, climate, water resource availability and soil types. The information here should be very general as the site specific information regarding these resources will be included in the onsite agricultural resources section.
- Provide an overview of the dominant land uses in the region.
- Describe the general vicinity in terms of type and density of development and infrastructure.
- Specify public and private ownership of land in the vicinity, particularly preserved lands, the location of lands within an agricultural preserve, and lands under a

Williamson Act Contract. Describe any preserved lands adjacent or contiguous with the site.

- Include a description of typical agricultural uses in the region including intensity and value.
- Identify the location and types of FMMP designations in the region.

This section should include the following maps (11x17 max.) with the project site clearly identified:

- A regional aerial photo(s) showing the relationship of the project site to surrounding lands.
- A map identifying the FMMP designations in the region including a legend.

1.4.2 Onsite Agricultural Resources

Generally describe the agricultural resources on the project site. Agricultural resources include active agricultural operations, areas of the site designated as an FMMP Important Farmland Category (that meets the definition of the FMMP designation), and areas of the site with a history of agricultural production based on aerial photography or other data sources identifying agricultural land uses. Agricultural resources do not include developed lands, areas of soil compaction (i.e. dirt roads), or biological resources except that non-native grassland should be defined as an agricultural resource, if it was used for agriculture in the past.

Include a figure to identify the area of the site defined as an agricultural resource. Site features such as existing structures, dirt roads, and rock outcroppings shall be identified to aid in the assessment of the value of the site for agricultural purposes. Where the project also has a biological resources map, ensure that the map is consistent with the mapping done for biological resource evaluation with the exception that non-native grasslands that have been used for agriculture may also be mapped as agriculture. The discussion under each subheading that follows should be based on the area of agricultural resources onsite, as described above.

If no agricultural resources are located onsite simply state this fact, do not include the subheadings listed below, and skip to the next section of the report.

Soils

Identify the soil types for the agricultural resources on the project site. Provide a description of the associated Land Capability Classification (LCC), Storie Index, and suitability for crop production based on information from the San Diego Area Soil Surveys or other data sources. Identify whether any of the soils meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance. Soils that meet these criteria are available at

http://www.conservation.ca.gov/DLRP/fmmp/pubs/soils/SANDIEGO_ssurgo.pdf.

Include a map that identifies the soil types of the agricultural resources onsite.

FMMP Farmland Designations

Include a very brief description of the Department of Conservation's FMMP. Include definitions of each FMMP designation located on the project site and quantify the acreage of each FMMP category located on the project site. Verify that each designation meets the associated FMMP definition. If the land does not meet the definition of the mapped Farmland category when examined at a site specific level, identify why the land does not meet the definition and recognize that such mapping inconsistencies are common based on the gross scale of the State level mapping effort (i.e. the FMMP maps are developed with a 10 acre minimum mapping unit and are based largely on aerial photo interpretation and digital soil survey information. Due to these factors, site specific mapping errors are common). If there are designated Farmlands that do not meet the respective Farmland definition, include a table that identifies the acreage mapped by the State for each category and the actual FMMP acreage after verification. Include clear justification for any reduction in the mapped FMMP acreage.

Include a map that identifies the FMMP Farmland Designations on the project site, with any areas that do not meet the Farmland definition clearly identified.

History of Agricultural Use

Provide details regarding the history of agricultural use of the property. If a Phase I Environmental Site Assessment (ESA) or a cultural resources report was completed for the site, these are good resources to identify past agricultural uses. If the most recent use of the site was agriculture and the farm operators are available to provide details of production, include production information based on an operator interview.

Climate

Discuss the climate at the site such as rainfall, temperature, humidity, and frequency of temperature extremes. Include regional weather station precipitation and temperature information if the weather station data is representative of site conditions. If an interview with local agricultural operators is completed, inquire about local weather conditions. Include a discussion of the project's location in relation to the San Diego Plantclimate Map prepared by the University of California Agricultural Extension Service and discuss the importance of the area's climate as it relates to agriculture. Identify the Sunset Zone and USDA Hardiness Rating applicable to the site and discuss the type of crops that would be viable based on climate. Describe the purpose of the Sunset Zone and USDA Hardiness ratings. Discuss any limitations for agricultural production based on climate.

Water Resources

Discuss the type of water supply available to serve the project site. Identify whether imported water is currently available at the site. If the site is not already connected to imported water, identify whether the project proposes to connect to imported water and how far the imported water infrastructure would need to be extended to serve the site. Identify the number, quality and location of groundwater wells and identify the type of groundwater aquifer that the water is accessed from. If groundwater quality information is available, provide this information.

Williamson Act Contracts and Agricultural Preserves

Identify whether the land is under a Williamson Act Contract (Contract) and whether the project is within an Agricultural Preserve. If the project is under Contract or in a Preserve, identify the Contract and/or Preserve Name and Number. If a project is under a Contract, no land use is allowed that conflicts with the provisions of the Contract. A copy of the contract should be included as an attachment to the analysis. Contracts are on file with the DPLU.

Prime Agricultural Land

Only include this section if the project includes a LAFCO action that involves a significant extension of water or sewer service into previously unserved areas (i.e. a reorganization that would expand service beyond properties adjacent to the district boundary). Include a discussion regarding the presence of Prime Agricultural Lands on the project site as defined in Government Code Section 56064. 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 Natural Resources Conservation Service 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 Handbook on Range and Related Grazing Lands, July, 1967, developed pursuant to Public Law 46, December 1935.
- (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.”

1.4.3 Offsite Agricultural Resources

If no offsite agricultural resources are present, skip this section as the regional setting discussion would have already established the lack of surrounding agricultural resources. Agricultural operations within one mile from the project site must be identified if the project proposes a school, day care, or group care. For all other project types, agricultural operations within one-quarter mile from the project site must be identified, as detailed below.

- Identify any land under a Williamson Act Contract and describe the types of agricultural uses that have occurred or currently occur on lands under contract.
- Identify FMMP Farmland designations.
- Identify active agricultural operations, the type of commodity produced, and describe the customary agricultural practices associated with production such as labor requirements, frequency of chemical application, truck traffic associated with deliveries, etc. Where feasible, contact adjacent agricultural operators for detailed information about production practices.

Include map(s) that identifies Williamson Act Contract lands, FMMP designations, and active agricultural operations for the appropriate surrounding area (one mile or one-quarter mile). For efficiency in report preparation, when using a one-quarter mile boundary, the boundary should be drawn in accordance with the direction provided for defining the project’s Zone of Influence (ZOI) as defined in Attachment F of the Guidelines for Determining Significance for Agricultural Resources. **Do not simply draw a 0.25 mile boundary around the project site and call it a ZOI.** Identifying all agricultural resources within the ZOI will be useful for completing the surrounding land use portion of the LARA model, Section 2.1.

1.4.4 Zoning and General Plan Designation

Identify whether the site is located in an agricultural zone (A70 or A72). If the project is located in an agricultural zone, state the intent of the zone. If the project is not in an agricultural zone, identify the zone the site is located in and identify that it is not an agricultural zone

Identify whether the site is located in an Agricultural General Plan Designation, (19) Intensive Agriculture or (20) General Agriculture. If the project is in the (19) Intensive Agriculture Designation and proposes two acre lots, state the findings that must be made to allow the two acre density and identify how the project meets the required findings. If the site is located in an agricultural designation, state the purpose of the designation. If the site is not located in an agricultural land use designation of the

General Plan, state the designation it is in and the fact that it is not an agricultural land use designation.

2.0 *ONSITE AGRICULTURAL RESOURCES*

If there are no onsite agricultural resources, skip to Section 3.0.

2.1 *Local Agricultural Resource Assessment (LARA) Model*

Insert the following information as a brief explanation of the LARA model:

“The County of San Diego has approved a local methodology that is used to determine the importance of agricultural resources in the unincorporated area of San Diego County, known as the Local Agricultural Resource Assessment (LARA) model. The LARA model takes into account six factors including water, climate, soil quality, surrounding land uses, land use consistency, and slope in determining the importance of agricultural resources.

The following subheadings include a description of the project site’s rating for each LARA model factor, including justification for the factor ratings assigned to the project site. Each factor receives a rating of high, moderate or low importance based on site specific information as detailed in the LARA Model Instructions (*Section 3.1 LARA Model Instructions, from the Agriculture Guidelines for Determining Significance*). The factor ratings for the project site are summarized in Table XX, LARA Model Factor Ratings. The final LARA model result is based on the resulting combination of factor ratings, in accordance with Table XX, Interpretation of LARA Model Results.”

2.1.1 *LARA Model Factors*

Under each subheading below, describe the site specific conditions that results in each LARA factor rating for the site. Explanation included in the Guidelines for Determining Significance should be included to provide background information regarding the purpose and justification of each factor.

Water

State the LARA model water score for the site and justify the rating.

Climate

State the LARA model climate score for the site and justify the rating.

Soil Quality

State the LARA model soil quality score for the site and justify the rating. Include a graphic of the area “available for agricultural use”. This will be useful to reference for both the soil quality and the topography rating.

Surrounding Land Uses

State the LARA model surrounding land use score for the site and justify the rating. Include a graphic that identifies the surrounding land use interpretation that resulted in the associated score. An aerial photograph is required. Clearly label the project site and the Zone of Influence (ZOI) boundary. Define the ZOI when it is first mentioned in the report.

Land Use Consistency

State the LARA model land use consistency score for the site and justify the rating. Include a graphic that represents the range of parcel sizes within the ZOI and clearly label the project site and the ZOI boundary.

Slope

State the LARA model slope score for the site and justify the rating. Remember to base the score only on the “areas available for agricultural use” as defined in the soil quality rating. Include a graphic that identifies the slope categories used in the LARA model for the areas available for agricultural use on the project site.

2.1.2 LARA Model Result

Include tables in this section that summarize the LARA model factor ratings and the Interpretation of LARA Model Results, as suggested below. Include a brief description of the site’s LARA model ratings, explain the conclusion of the site’s agricultural importance based on the Interpretations of LARA Model Results table, and clearly state whether the site is or is not an important agricultural resource based on the LARA model results.

Table XX. LARA Model Factor Ratings

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

Table XX. Interpretation of LARA Model Results

LARA Model Results			LARA Model Interpretation
Possible Scenarios	Required Factors	Complementary Factors	
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 <i>not</i> an important agricultural resource
Scenario 6	All other model results		

2.2 Guidelines for the Determination of Significance

Include the following information in this section:

“The following significance guideline is the basis for determining the significance of impacts to important onsite agricultural resources, as defined by the LARA Model, in San Diego County. Direct impacts to agricultural resources are potentially significant when a project would result in the following:

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

2.3 Analysis of Project Effects

Using the guideline in Section 2.2, discuss the significance of any potential direct impacts to important agricultural resources onsite. If the LARA model determined that the site is not an important agricultural resource, this should be briefly stated and no further analysis required. The focus of the determination of significance is the extent to which the project would impact agricultural resources that meet the Prime and Statewide Importance soil candidate criteria. The analysis should include the following information:

- A quantification of the total project impact to land defined as an agricultural resource that meets the Prime and Statewide Importance soil candidate criteria. Impacted means that the land would be precluded from agricultural use. The following areas of a project site are typically precluded from agricultural use: (1) land within biological open space easements or other easements that would preclude the use of the land for agriculture; (2) land with proposed structures or paving; (3) land within a road right of way; and (4) land within 15 feet of front and side yards of residences and within 30 feet from the rear yard of residences. An assumption is made that no agriculture will occur within the stated distances from residences based on the fact that an average homeowner will usually maintain landscaping and outdoor recreation areas around the residence.
- Based on the quantification detailed above, determine whether at least half of the site's agricultural resources that meet the Prime or Statewide Importance soil quality criteria, would remain available *and viable* for agricultural use.
- If the preserved resources are determined to be viable on site with the proposed project design, the analysis must include detailed justification as to why the resources will remain viable. The analysis should discuss the viability of the area that will be available for agricultural use. Discussion of viability may include providing local examples of productive agriculture occurring on similar areas and/or parcel sizes and discussion of the economics of farming in San Diego County, for example.
- The analysis must make a conclusion, based on the significance guidelines, whether or not the impacts are significant.

LAFCO Consistency

Only include this section if the project includes a LAFCO action that involves a significant extension of water or sewer service into previously unserved areas (i.e. a reorganization that would expand service beyond properties adjacent to the district boundary). Identify LAFCO's Legislative Policy L-101. The policy states,

"LAFCOs are required to consider how spheres of influence or changes of local governmental organization could affect open space and prime agricultural lands. Commissions are directed to guide development away from prime agricultural lands – unless that action would not promote the

planned, orderly and efficient development of an area – and to encourage 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 boundary (Govt. Code § 56377). Proposals must be further reviewed for their effect on maintaining the physical and economic integrity of agricultural lands (Govt. Code § 56668).

It is the policy of the San Diego Local Agency Formation Commission to:

1. Discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area **or** the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use;
2. Require rezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development;
3. Follow San Diego LAFCO’s adopted procedures to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.”

In this section, the analysis should address policies 1 and 3 by identifying whether the proposal would adversely affect Prime Agricultural lands. The results of the LARA model may be included as part of the discussion, however additional discussion must be included to address if the project would constitute an adverse effect on Prime Agricultural Lands. Include a discussion regarding whether the project promotes the planned, orderly, efficient development of the area. Make a clear conclusion regarding project compliance with policies one and three from LAFCO Legislative Policy L-101.

2.4 Mitigation Measures and Design Considerations

Provide brief descriptions of proposed mitigation measures and design considerations. These may include changes to the project design to accommodate agricultural resources or reduction in parcel yield to accommodate agricultural use, for example. Refer to Attachment A for a description of Limited Building Zone (LBZ) easements and their use as a mitigation measure. If onsite preservation of agricultural resources is proposed, this section should discuss the need to apply a LBZ over the area intended for agricultural preservation. See Section 5.1 of the Guidelines for Determining Significance under the heading, Limited Building Zones, for discussion that describes when a LBZ is needed.

2.5 Conclusions

Determine if the proposed mitigation measures and/or project design considerations have reduced the significance level to “less than significant” in accordance with the stated significance guideline.

3.0 OFFSITE AGRICULTURAL RESOURCES

3.1 Guidelines for the Determination of Significance

Include the following information in this section:

“The following significance guidelines are the basis for determining the significance of indirect impacts to offsite agricultural operations and Williamson Act Contract land in San Diego County:

- 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 proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.***
- 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 proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.***
- c. The project would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite 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 analysis of project effects section should include a discussion of the potential agriculture interface conflicts that could occur. This analysis must identify potential interface conflicts and discuss why those conflicts would or would not result in significant adverse effects. Discussion should include distances from proposed uses to offsite operations including discussion of land uses that separate the existing and proposed uses (such as roads, landscaping and topography). Discuss typical farm management practices associated with surrounding agricultural uses, based on a farm operator interview, if possible.

The analysis must make a conclusion, based on the significance guidelines, whether or not these impacts are significant.

3.3 Mitigation Measures and Design Considerations

Provide brief descriptions of proposed mitigation measures and design considerations. Refer to Attachment A for a description of LBZ Easements and their use as a mitigation measure. If potential indirect impacts to offsite agricultural operations could occur as a result of incompatible uses potentially being located near an offsite agricultural operation, a LBZ on the portion of the site adjacent to the offsite agricultural operation may be proposed to provide a compatibility buffer that would restrict certain incompatible uses (i.e. swimming pools, habitable structures, etc.) near offsite agricultural operations. The width of the compatibility buffer depends on site specific conditions.

3.4 Conclusions

Determine if the proposed mitigation measures and/or project design considerations have reduced the significance level to “less than significant” in accordance with the stated significance guideline.

4.0 CONFORMANCE WITH AGRICULTURAL POLICIES

Only include Section 4.0 if the project must demonstrate compliance with General Plan policies related to agriculture. General Plan conformance will not usually be addressed within an agriculture technical report unless there is specific agricultural analysis that must be done to determine compliance with the policy. General Plan conformance will usually be addressed in the CEQA analysis of Land Use and Planning, therefore this section would rarely be used. If specific policies pertaining to agriculture apply to the project and an Environmental Impact Report (EIR) is being prepared, a decision must be made whether to assess conformance with such policies in the agricultural resources section or land use and planning section of the EIR. This decision is made by County staff on a case by case basis.

4.1 Applicable General and Community Plan Policies

Identify any agriculture related General Plan policies with strict requirements for conformance in this section.

4.2 Project Consistency with Applicable Policies

Discuss whether the project complies with the policies listed above.

4.3 Conclusions

Provide a clear conclusion regarding project conformance with applicable agricultural policies in the General Plan.

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 project level impacts except 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.

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. When a plan or EIR with adequate projections of potential cumulative impacts to agriculture becomes available, this may be used as an alternative to the list of projects approach when completing a cumulative analysis. Additional direction for completing a cumulative analysis using a summary of projections will need to be added to this document when that approach becomes available. When using the list of projects approach, only projects with agricultural resources onsite should be included in the cumulative analysis. It is recommended that a table be included in an Appendix that lists each project and that includes the following information at a minimum:

Table XX. Cumulative Project List

Project name	Project number	Agricultural resources onsite	Important Agricultural Resource?	Direct impact estimate	Potential indirect impact estimate
		<i>Generally describe the agricultural resources on each project site (i.e. orchards or row crops)</i>	<i>Reference LARA model result, if available. If not, provide soils, water and climate information to determine importance</i>	<i>Based on project size, proposed density, and amount of agricultural resources present, estimate the direct impact for each project</i>	<i>Determine the extent to which projects are proposed adjacent to offsite agricultural uses and would adversely impact those resources</i>
				<i>Identify total potential cumulative impact</i>	<i>Identify total potential cumulative indirect impact</i>

A graphic must be included that identifies the location of each project in relation to the proposed project site.

The list of projects is based on a defined cumulative study area. The consultant, in consultation with County staff, must determine the extent of the area used in the cumulative analysis. The area should be defined by considering the following factors and others, as appropriate: agricultural land use patterns, topography, history of the local agricultural community, using best professional judgment.

Where the LARA has been completed for projects within the cumulative study area, the model results should be referenced in the cumulative analysis. Where the LARA model has not been completed for proposed projects in the cumulative study area that have the potential to impact agriculture, a more general analysis of the site’s importance as an agricultural resource may be undertaken considering the underlying soil type, the availability of water, and climate. Where projects in the cumulative study area contain important agricultural resources that would potentially be impacted, a more detailed analysis of the significance of the potential loss of those resources must be undertaken.

The analysis of potential cumulative impacts should generally be structured as follows: “The cumulative projects study area was chosen because _____. The cumulative projects will impact xxx (sample: xxx acres or xxx percent). This is/is not significant because _____.” (If significant), “The project’s contribution is xxx percent of the total cumulative impact. This is/is not considerable because _____.”

If the cumulative impact is significant, the consultant shall determine whether the project makes a cumulatively considerable contribution to the significant cumulative impact. Mitigation to reduce the significance of a cumulatively considerable

contribution to a significant cumulative impact may include a reduction in the project's contribution to the loss of resources, or offsite mitigation to replace impacted resources.

The cumulative analysis should take the following points into consideration:

- What is the relative value of the agricultural commodities that would be impacted within the cumulative analysis boundary as compared to the production value of other commodities produced in San Diego County?
- Is the community under significant pressure to convert land to non-agricultural uses?
- Will cumulative projects result in incompatible development that would increase agriculture interface conflicts and associated agricultural viability?

The above points are intended to indicate the relative importance of agricultural use within the cumulative analysis boundary and to identify the significance of the cumulative impact to agriculture after all cumulative projects are considered. In general, if the agricultural community has low value agriculture, is not under significant pressure to convert to non-agricultural uses, or a significant amount of lands would remain available for agricultural use after consideration of the potential cumulative impacts, the likelihood of the project having a significant cumulative impact is low. In contrast, a significant cumulative impact is more likely to occur when the impacts are located in an agricultural community where high value agriculture and a significant pressure to convert to non-agricultural use exists.

If it is determined that the impacts from cumulative projects are significant, the following points should be evaluated to support a conclusion as to whether the project's incremental impacts are cumulatively considerable:

- Consider the extent of the project's impact in relation to the identified cumulative impact. Will the project preserve the viability of ongoing agriculture at the site? Are the project's impacts considerable in relation to the impacts of the cumulative projects?
- Consider the type of project proposed. General Plan Amendments and LAFCO district expansions that would adversely affect agricultural resources are projects with a high likelihood of causing cumulative impacts.
- Consider whether the project could result in growth inducing impacts into an agricultural area. A project with growth inducing impacts, where the growth inducement would occur in an agricultural area, will usually have a cumulatively considerable impact to agricultural resources. Growth inducement can be caused by extension of imported water infrastructure, sewer service, or other urban level services and amenities, for example.

5.3 Mitigation Measures and Design Considerations

Provide brief descriptions of proposed mitigation measures and/or design considerations, if additional measures are needed to reduce the significance of potential cumulative impacts.

5.4 Conclusions

Provide a clear conclusion regarding whether cumulative impacts are significant based on the list of projects. If cumulative impacts are significant, identify whether the project's incremental effect is cumulatively considerable.

6.0 *SUMMARY OF PROJECT IMPACTS AND MITIGATION*

This section shall provide a brief text summary of identified project impacts and mitigation.

7.0 *REFERENCES*

Include all references used to complete the report.

8.0 *LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED*

Provide a list of preparers, noting each person included on the County list of approved consultants. Note that the principal author must be on the list or the report will not be accepted.

TECHNICAL APPENDICES / ATTACHMENTS

The Table of Contents shall list each document attached to the report in the order in which they are referenced in the report. The following documents must be included in the report, either within the body of the report or as an attachment:

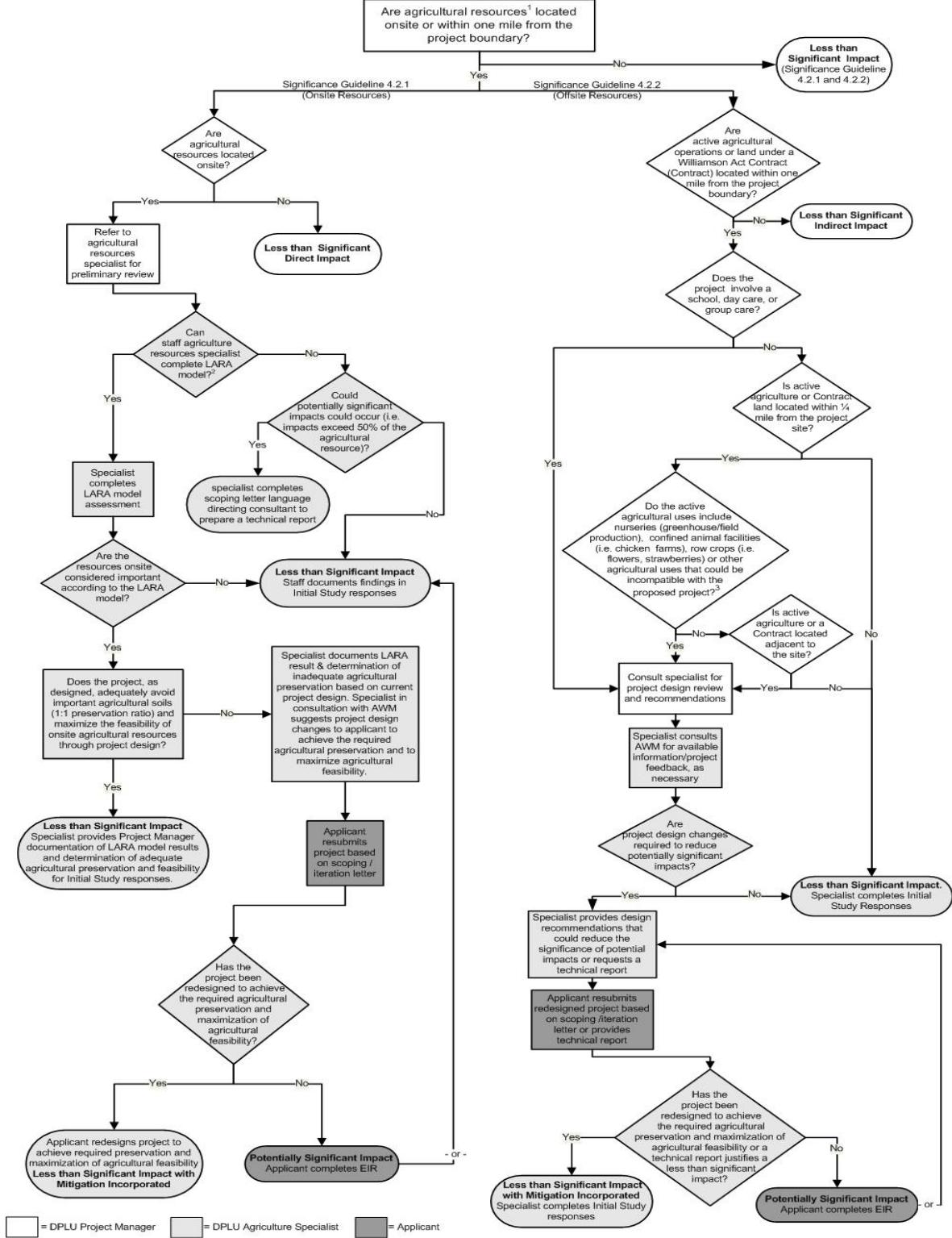
- A. Maps and Figures and project plot plan/map (if not clearly shown on the agricultural resource map);
- B. Vicinity and USGS topographic maps if not included elsewhere in the document.
- C. Any other documents necessary to supplement the information provided within the agricultural report;
- D. Agricultural Operator or Knowledgeable Person Interview Results; (to assess potential indirect impacts offsite operations);
- E. LARA Model Instructions, when the LARA model is completed as part of the technical report, include as an attachment Section 3.1, LARA Model Instructions from the Agricultural Resources Guidelines for Determining Significance, and
- F. Cumulative Project List, attach the cumulative project list.

Attachment A Limited Building Zone Easements

Limited Building Zone (LBZ) Easements is a mechanism used to preserve the availability of important onsite agricultural resources for ongoing or future agricultural use. They are also used to protect offsite agricultural resources from adjacent incompatible uses. The term limited building zone is used instead of agricultural conservation easement because the application of the easement ensures that the land resource would remain available for agricultural use by prohibiting structures or uses that would preclude the use of the land for agriculture. Agricultural conservation easements are voluntary easements that typically involve valuation and purchase of the development value of the easement area.

LBZ easements are typically applied adjacent to any on- or off-site biological open space easements to prohibit the building of structures that would require vegetation clearing within the protected open space for fuel management purposes. A LBZ to protect biological open space may overlap with the LBZ required to preserve land for agricultural use, however all allowable uses must be consistent with the purpose of both biological protection and agricultural resource protection. For LBZ easements to protect biology, the easement usually includes the provision to allow structures that do not require fire fuel modification/vegetation management. If the LBZ will be used to achieve the required onsite agricultural resource protection, allowable structures must be limited to those incidental to the agricultural use of the land.

Attachment B Agricultural Resources Screening and Significance Flowchart*



□ = DPLU Project Manager □ = DPLU Agriculture Specialist □ = Applicant
¹ Agricultural resources include active agricultural operations; sites designated as and that meet the definition of a F MMP Important Farmland Category; and sites with a history of agricultural production based on aerial photography or other data sources identifying agricultural land uses.
² The LARA model will be applied by County staff unless it is not feasible due to large project size or other peculiar site conditions.
³ Orchard crops such as avocados and citrus typically have less compatibility issues than the referenced agricultural uses due to less chemical treatments, less farmworker presence, less truck traffic, or less odor; however the site specific conditions of each commodity must be taken into consideration when determining whether an agricultural use could be incompatible with the proposed project.

*Larger format also available online at <http://www.sdcountry.ca.gov/dplu/Resource/>.