

3.1 Agricultural and Forest Resources

This section describes agricultural resources on the project site and vicinity, and identifies the potential impacts to agricultural resources that would result from implementation of the proposed project. The analysis in this section is based on the Summary of Local Agricultural Resource Assessment (LARA) Model for the El Monte Sand Mining Project that was prepared for the proposed project (ESA 2018) which is included as Appendix E of this EIR.

3.1.1 Existing Conditions

Land use in the El Monte Valley is limited by the physical constraints of the steep valley slopes and the presence of the San Diego River floodway. The surrounding project area is characterized by/zoned as open space, rural residential, limited agriculture, and extractive use (see Figure 3.1-1). Individual and small clusters of ranch-style homes are located to the north and south of the project site. Existing land uses in the project area include rural residential, intensive agriculture, dairy farming, field and orchard crops, public lands, public utilities easements, and undeveloped land. The El Monte Valley is a rural community with an active equestrian population and also includes the working Van Ommering Dairy Farm located immediately the north of the project site. Portions of El Monte Valley located south of the San Diego River are also actively engaged in agricultural activities. Crops typically grown in the area include bamboo shoots, chives, and snow peas.

The project site includes an approximately 2-mile-long section of the San Diego River floodplain and adjacent upland habitat that is predominantly vacant and undeveloped. There are some developed lands present in the southwestern portion of the project site including existing roads, informal trails, and utility corridors (overhead powerlines and water infrastructure) that traverse the project site from east to west and north to south. Recreationists and equestrians utilize these roads and trails on a regular basis. The project site is dominated by disturbed/non-native vegetation, with small inclusions of coastal sage scrub, riparian scrub, and riparian/oak woodland. Riparian ecological functions onsite have been diminished as a result of previous disturbances to the project site, including previous sand mining, agricultural uses, partial grading for the previously approved Golf Course project, and reduced water flow caused by the El Capitan Dam (located approximately 2 miles east of the project site). The project site does not contain any forest land or timberland as defined in the Public Resources Codes (PRC) or Government Code 51104(g).

3.1.1.1 Onsite Agricultural Resources

The most recent California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) classification data within the project site is depicted in Figure 3.1-2 (CDC 2015). The project site includes the

following farmland classifications, which are also shown in Table 3.1-1: Grazing Land, Farmland of Local Importance, and Other Land. There are no active agricultural activities currently in operation on the project site.

According to the FMMP classification data, land designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Urban and Built-Up Land do not exist within the project site.

3.1.1.2 Surrounding Agricultural Land Uses and Agricultural Interface

Prime Farmland, Unique Farmland, and Farmland of Statewide Importance exist within the project's Zone of Influence (ZOI), as well as other FMMP classifications including Grazing Land, Farmland of Local Importance, Urban and Built-Up Land, and Other Land. The project's ZOI is defined as the area within 0.25-mile of the project site, and any parcels that intersect the 0.25-mile boundary. Currently, an area southeast of the project site is designated as Prime Farmland, and is engaged in agricultural activities. Crops typically grown in the area include bamboo shoots, chives, and snow peas. Farmland of Statewide Importance is located both north and southeast of the project site, and Unique Farmland is located southeast of the project site. North of the project site and also east of Dairy Road, the land has been developed with a working dairy farm (the Van Ommering property).

3.1.1.3 Regulatory Framework

Federal

Farmland Protection Policy Act of 1981

The United States Department of Agriculture (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.

State

California Department of Conservation, Division of Land Resource Protection's Farmland Mapping and Monitoring Program

The goal of the FMMP is to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. FMMP produces "Important Farmland Maps," which are a hybrid of resource quality (soils) and land use information. Agricultural lands are rated according to soil quality and irrigation status, with Important Farmland maps updated every two years based on aerial photograph review, computer mapping analysis, public input, and field

reconnaissance. The FMMP is non-regulatory, and was developed to inventory land and provide categorical definitions of important farmlands to provide consistent and impartial data to decision makers for use in presenting status, reviewing trends, and planning for the future of California's agricultural resources.

California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, better known as the Williamson Act (California Administrative Code Section 51200 et. seq.), creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict land to agricultural and open space uses. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value, which saves landowners from 20 to 75 percent in property tax liability each year. Agricultural Preserves are areas that are eligible for Williamson Act contracts; the boundaries of the preserve areas are drawn by the County and are adopted by resolution of the Board of Supervisors. There are no Williamson Act contracts on the project site.

Local

County of San Diego General Plan

The County General Plan is a comprehensive planning guide for unincorporated areas within the County. Related agricultural policies within the Conservation and Open Space Element and the Lakeside Community Plan are summarized below (San Diego County 2011a–c):

Conservation and Open Space Element

It is the intent of the County General Plan Conservation and Open Space Element to provide direction to future growth and development with respect to the conservation, management, and utilization of natural resources, including agricultural resources. Agricultural goals and policies address minimizing land use conflicts, preserving agricultural resources, and supporting the long term-presence and viability of the agricultural industry as an important component of the region's economy and open space linkage.

The following goals and policies would be applicable to the proposed project:

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

Policies

COS-6.2: Protection of Agricultural Operations. Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:

- Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations
- Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses.
- Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural uses within the development.
- Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture
- Supporting local and State right-to-farm regulations.
- Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process.
- Discourage development that is potentially incompatible with intensive agricultural uses, including schools and civic buildings where the public gather, daycare facilities under private institutional use, private institutional uses (e.g., private hospitals or rest homes), residential densities higher than two dwelling units per acre, and office and retail commercial.

COS-6.3: Compatibility with Recreation and Open Space. Encourage siting recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.

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

Lakeside Community Plan

The proposed project is located in the Lakeside Community Plan Area. The Lakeside Community Plan outlines goals, policies, and recommendations for the Lakeside area. The following agricultural goals and policies would be applicable to the proposed project:

Agricultural Goal. Provide for the preservation of agricultural land uses while maintaining their compatibility with other non-rural uses.

Policies and Recommendations

1. Promote agricultural land uses that are compatible with the topography and environment.
2. Permit the co-existence of agricultural land uses and other compatible land uses in the community.
3. Encourage the continued development of suitable land for orchards and groves, as well as truck and seed crops.
4. Promote agriculture as one of the highest and best uses for open space and floodplains.
5. Encourage the use of agriculture to provide visually pleasing open space and variety within the rural environment.
6. Enhance economic advantages to agriculture to help it compete with other alternative land uses.
7. Analyze existing animal regulators for rural properties and apply less restrictive animal regulators to areas where the application of such regulators can be found compatible with neighboring uses.
8. Permit animal raising projects sponsored by recognized youth organizations in designated areas of Lakeside.

San Diego County Zoning Ordinance

Approximately 75 acres of land located in the northeastern portion of the project site are zoned A70, Limited Agriculture (see Figure 3.1-1). The intent of the A70 zoning classification is to preserve areas intended for agricultural crop production. This zoning designation allows for limited development consistent with rural residential and a variety of agricultural uses. The A70 zoning classification allows for mining activities and other types of utility- and recreation-related land uses with approval of a MUP.

3.1.2 Analysis of Project Effects and Determination as to Significance

For the purpose of this EIR, the identified significance thresholds are based on criteria provided in the County Guidelines for Determining Significance and Report Format and Content Requirements for Agricultural Resources (County Guidelines for Agricultural Resources), revised June 23, 2015.

3.1.2.1 Issue 1: *Direct Conversion of Agricultural Resources*

Guidelines for the Determination of Significance

Based on the County Guidelines for Agricultural Resources, a significant impact would occur if the proposed project has important agricultural resources as defined by the LARA Model; and the proposed 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 proposed project would substantially impair the ongoing viability of the project site for agricultural use.

Analysis

Lara Model Analysis

Application of the LARA Model analysis (Appendix E) is intended for use in evaluating the importance of agricultural resources when it is determined that a discretionary project could adversely impact onsite agricultural resources. The LARA Model takes into account required factors (water, climate, and soil quality) and complementary factors (surrounding land uses, land use consistency, and topography) in determining the importance of the agricultural resource.

The LARA Model analysis determines a rating for both the required and complementary factors, and a determination of the agricultural resource significance of the project site. The summarized findings are provided in Table 3.1-2, below, and are described and expanded upon in the technical memorandum found in Appendix E.

Table 3.1-3 provides the LARA Model analysis results for the proposed project. As the water rating for the proposed project site is low, the proposed project site falls within Scenario 5, and is not considered an important agricultural resource.

As shown in Figure 3.1-2, portions of the project's ZOI are classified by the FMMP as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. However, these farmland classifications do not occur on the project site. Because the project site is not considered an important agricultural resource according to the LARA Model analysis, there would be **no impact** with regard to the direct conversion of agricultural resources as a result of the proposed project.

3.1.2.2 Issue 2: Land Use Conflicts

Guidelines for the Determination of Significance

Based on the County Guidelines for Agricultural Resources, the proposed project would have a significant impact if it conflicts with Agricultural Zoning and/or Williamson Act Contracts.

Analysis

Consistency with Zoning Classifications

County Zoning Ordinance – The majority of the project site (404 acres) is zoned S82 Extractive Use. However, approximately 75 acres of land located in the northeastern portion of the project site are zoned A70 Limited Agriculture (see Figure 3.1-1). As detailed in Chapter 1, Project Description, prior to the 1940s, the project site was used as grazing land for local dairy cattle. None of this land zoned for agriculture is currently in active production. The proposed activities that would occur within the area zoned as A70 include initial extractive operations to remove materials from the surface, refilling of a large depression, and revegetation of the resulting surface once backfill is completed. The intent of the A70 zoning classification is to create and preserve areas intended for agricultural crop production, and would be applied to areas throughout the County to protect moderate to high quality agricultural land. The A70 zoning classification does allow for mining activities and other types of utility and recreational land uses with approval of a MUP. Therefore, the proposed project would be consistent with the project site's A70 agricultural zoning classification.

Implementation of the proposed project would not conflict with agricultural zoning, and a **less than significant impact** would occur.

Williamson Act Contracts/Agricultural Preserves

The project site does not contain any Williamson Act Contract land or Agricultural Preserve land, and there are no Williamson Act Contract or Agricultural Preserve lands that exist within a 0.25-mile radius of the project site. Thus, there would be no land use conflicts between agricultural operation on Williamson Act Contract land and the proposed project, and a **less than significant impact** would occur.

3.1.2.3 Issues 3 and 4: Conversion of Forest Land or Timberland

Guidelines for the Determination of Significance

The County does not have specific guidelines for determining the significance for forest land or timberland. For the purpose of this EIR, Appendix G of the CEQA Guidelines applies to the impact analysis regarding if the proposed project would result in a significant impact to forest land or timberland if it would conflict with

existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production; or result in the loss of forest land or conversion of forest land to non-forest use.

Analysis

The project site does not contain forest land or timber land as defined by the Public Resources Code, sections 1220(g), 4526, or 51104(g). The project site is zoned as S82 Extractive Use (404 acres), and A70 Limited Agriculture (75 acres), and does not include or propose rezoning of forest land, timberland, or timberland-zoned Timberland Production. Therefore, **no impacts** would occur regarding the loss of forest land or conversion of forest land to non-forest use.

3.1.2.4 Issue 5: Indirect Conversion of Agricultural Resources

Guidelines for the Determination of Significance

Based on the County Guidelines for Agricultural Resources, the proposed project would have a significant impact if it:

- 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 proposed project, land use conflicts between the agricultural operation or Williamson Act Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use;
- 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 proposed project, land use conflicts between the agricultural operation or Williamson Act Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use; or
- Involves 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 Williamson Act Contract.

Analysis

The proposed sand mining activities would occur over a 12-year period, after which the project site would be revegetated with native plants and habitats. A recreational trail system would also be developed. Figure 3.1-3 depicts land uses in the project area. Existing agricultural uses are concentrated both north and south of the project site, outside of the project boundary.

The project site does not contain any Williamson Act Contract land, and there are no Williamson Act Contract lands within a 0.25-mile radius. Thus, there would be no land use conflicts between agricultural operations on Williamson Act Contract land and the proposed project.

Similarly, the project does not propose a school, church, daycare, or other use that involves a concentration of people at certain times within 1 mile of an agricultural operation or Williamson Act contract land. Therefore, the proposed project would not conflict with nearby agricultural uses or convert agricultural resources to non-agricultural use.

The project has potentially significant impacts from the site preparation, construction, excavation and reclamation activities related to noise and air quality that were also considered for potential effects on the Van Ommering Dairy Farm, which is located just north of the project site near the intersection of Willow Road and Dairy Road. However, these impacts have been determined to be less than significant with implementation of noise mitigation measures and air quality mitigation measures and design considerations. The sound threshold expected to cause a behavioral response by animals (including dairy cows) is 85 to 90 dB, but the actual noise limit for cattle is unknown (CHSRA 2012). The Van Ommering Dairy Farm holds their dairy cows in a barn located approximately 820 feet from the proposed project's mobile processing plant operations in Phase 1, the project's highest noise generation sources for that phase. At this distance, plant operations would be approximately 58 dBA, and therefore would not impact dairy cows. In addition, at this distance, site preparation activities would be approximately 54 dBA, and excavation and reclamation activities would be approximately 57 dBA, and therefore would not impact dairy cows. In addition, as the project is phased from east to west, reclamation and revegetation would create additional buffer widths between subsequent mining phases and the dairy farm. All truck traffic associated with the project site would occur along the onsite haul road and exit on El Monte Road, west of the surrounding agricultural land uses. Water would be used to minimize dust created from truck traffic and construction equipment on the project site. As a result, the proposed project would not have a significant negative impact to the surrounding agricultural production, and would not interfere with the surrounding ongoing agricultural practices.

As described above, there would be no land use conflicts between agricultural operations on Williamson Act Contract land and the proposed project, and the proposed project would not conflict with nearby agricultural uses or convert agricultural resources to non-agricultural use. In addition, the proposed project would not adversely impact the viability of the surrounding agricultural uses. Therefore, impacts would be **less than significant**.

3.1.3 Cumulative Impact Analysis

Issue 1: Direct Conversion of Agricultural Resources

For the proposed project's agricultural cumulative study area, the cumulative projects list (Table 1-11 in Chapter 1.0) was focused on projects that would be developed on land that is currently under agricultural production or currently designated as Prime Farmland by the FMMP within a 0.5-mile radius of the proposed project. This area was generated on the basis of the following considerations: (1) applicable cumulative project locations relative to the project site; (2) the presence of agricultural activity or designations; and (3) agricultural resource potential (e.g., the presence of high quality soils).

Based on this analysis and a review of the cumulative projects listed in Table 1-11, there are no projects that would be developed on land that is currently under agricultural production or currently designated as Prime Farmland within a 0.5-mile radius of the proposed project.

According to the County Guidelines for Agricultural Resources, a project that is determined not to be an important agricultural resource under the LARA Model analysis, that would not have significant indirect impacts to agricultural resources, and that would not conflict with agricultural zoning or lands under a Williamson Act Contract, would not have the potential to contribute to a cumulative impact. Thus, the proposed project would not cause or contribute to a cumulative impact associated with the direct conversion of agricultural resources.

Issue 2: Land Use Conflicts

The proposed project is not located on or adjacent to any Williamson Act Contract lands, and there is no potential for it to contribute to a cumulative project impact related to Williamson Act Contract lands. Similarly, there are no agricultural preserves located within the project site so there is no potential to contribute to a cumulative project impact related to agricultural preserves. The proposed project would also be in compliance with local agricultural zoning and would not contribute to a cumulative project impact related to agricultural zoning. Therefore, the proposed project would not cause or contribute to impacts associated with land use conflicts.

Issues 3 and 4: Conversion of Forest Land or Timberland

As the proposed project is not located on or adjacent to forest land or timberland, there is no potential for the proposed project to contribute to a cumulative project impact related to conversion of forest land or timberland.

Issue 5: Indirect Conversion of Agricultural Resources

Cumulative projects could result in the development of non-agricultural uses near agricultural uses, or the development on land zoned as agriculture, resulting in land use conflicts. Cumulative impacts related to the conversion of agricultural resources could result from edge effects such as trespassing, damage to crops, or damaged farm equipment. Indirect impacts associated with the cumulative projects located adjacent to agricultural operations could result from traffic, air quality, and noise impacts. The cumulative projects having similar indirect impacts as the proposed project would be required by the County to implement similar measures (i.e. dust minimization and buffers) to reduce their urban/agricultural interface impacts. Thus, each cumulative project would mitigate their own incremental contribution toward a cumulative impact and the proposed project, even when considered in conjunction with the cumulative projects identified in Table 1-11, would not contribute to a cumulatively considerable indirect impact.

3.1.4 Significance of Impacts Prior to Mitigation

As discussed above, no significant direct or indirect impacts related to agricultural resources would result from the proposed project. Thus, no mitigation is required.

3.1.5 Conclusion

The proposed sand mining activities would occur over a 12-year period, after which, the reclaimed areas of the project site would be restored to open space with a recreational trail system. The LARA Model analysis prepared for the proposed project indicates that the conversion of this portion of the existing agricultural resources along the San Diego River would be considered less than significant as the project site is not considered a significant agricultural resource (Appendix E).

The project site's existing zoning and land use designation is consistent with the proposed uses and long-term development of the project site would not significantly affect nearby agricultural areas. No conflicts with plans and policies related to agriculture have been identified. In addition, no impacts would occur regarding the loss of forest land or conversion of forest land to non-forest use.

The proposed project is determined to have a less than significant impact related to indirect impacts to adjacent agricultural land uses. Therefore, impacts are considered **less than significant**.

Table 3.1-1: Farmland Inventory of Project Site

FMMP Designation	Acreage	% of Project Site
Prime Farmland	0.00	0%
Unique Farmland	0.00	0%
Farmland of Statewide Importance	0.00	0%
Farmland of Local Importance	342.82	70%
Grazing Land	104.11	21%
Urban and Built-Up Land	0.00	0%
Other Land	42.07	9%
Total	489.00	

SOURCE: CDC, 2015

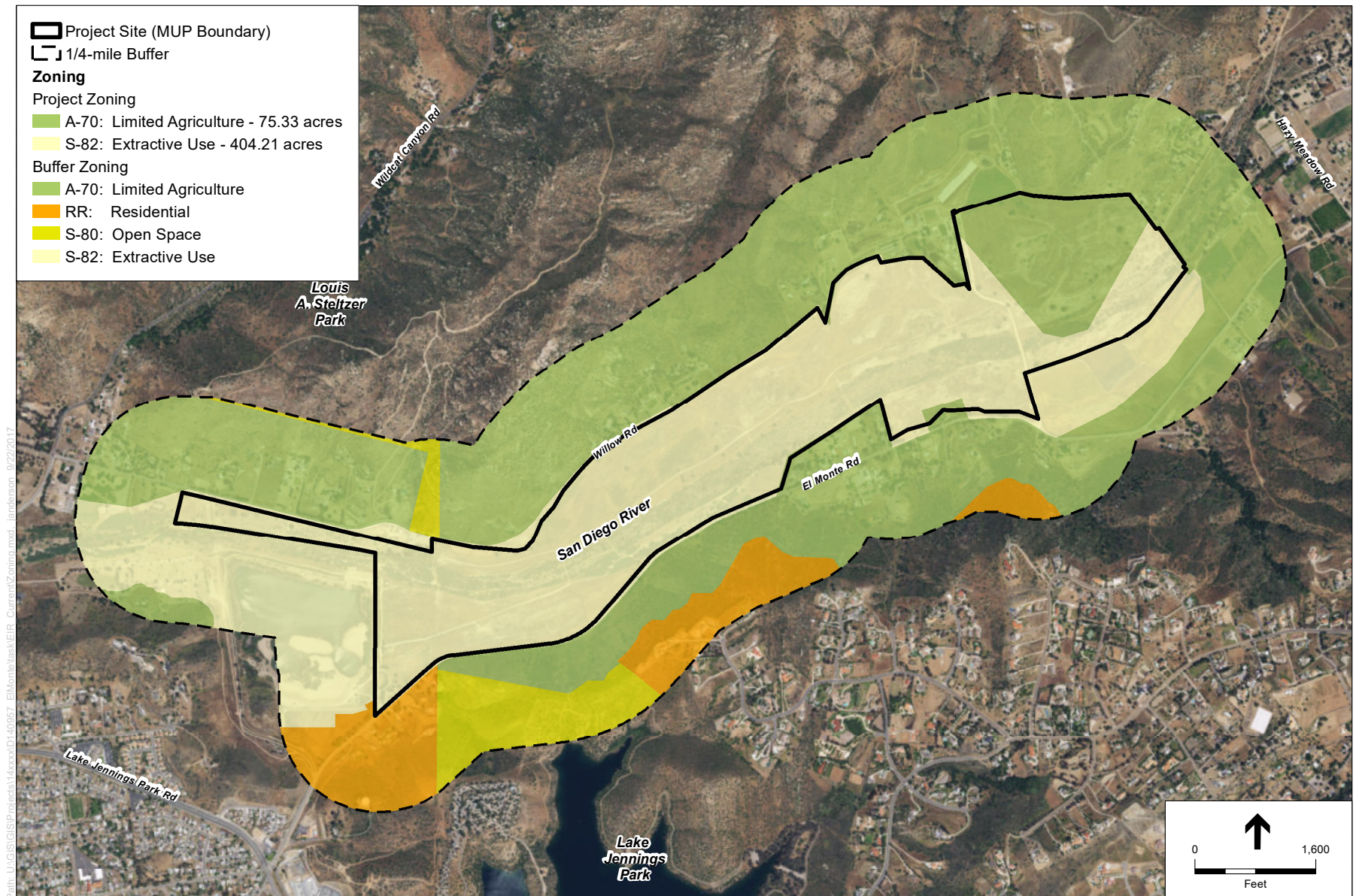
Table 3.1-2: LARA Model Summarized Findings

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

SOURCE: ESA, 2016

Table 3.1-3: LARA Model Results for Project

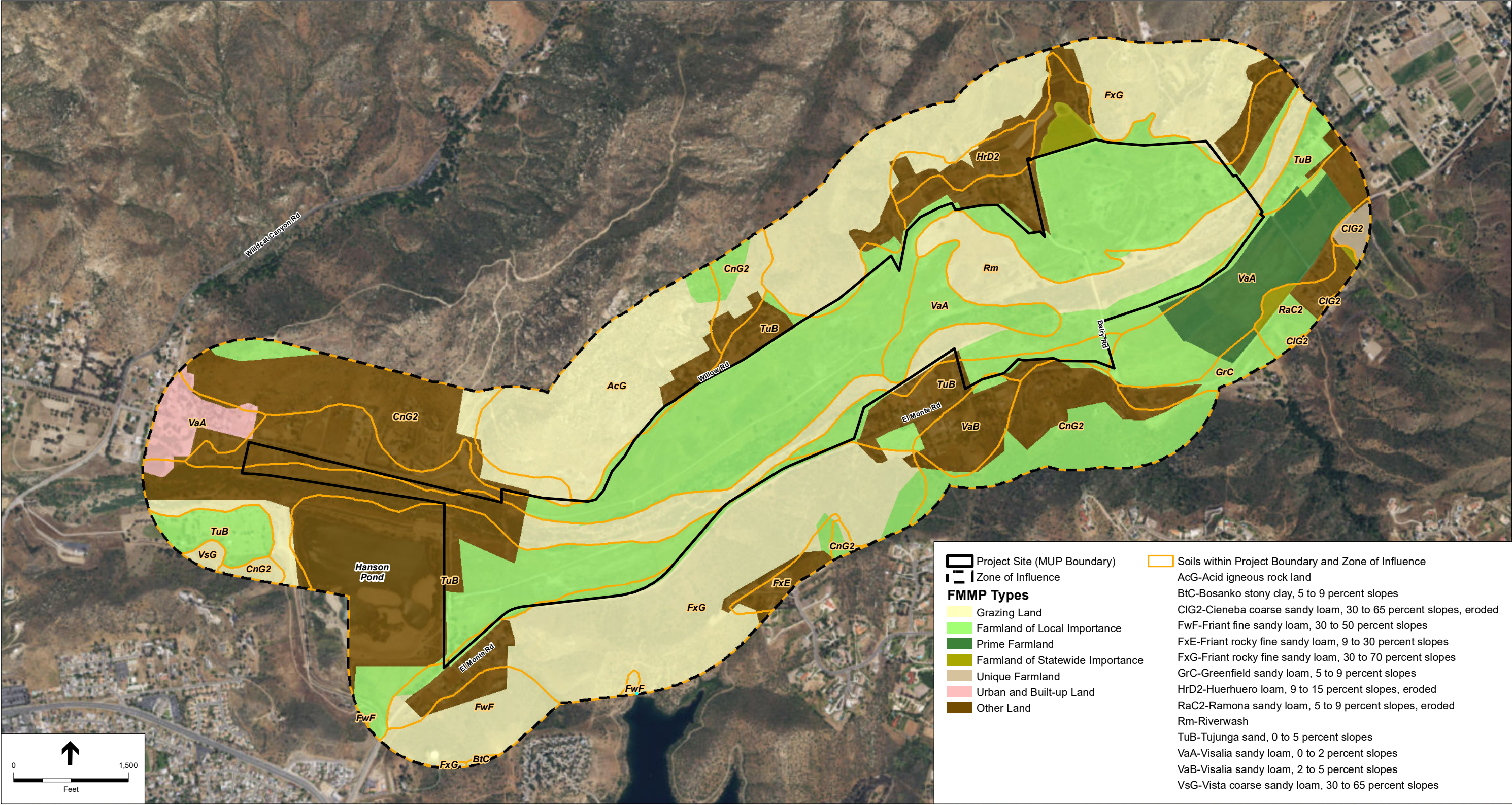
Required Factor	Rating
Water	Low
Climate	High
Soil Quality	High
Complementary Factor	
Surrounding Land Use	High
Land Use Consistency	Low
Slope	Moderate
Interpretation	
This site is not an important agricultural resource.	Scenario 5
SOURCE: ESA, 2016	



SOURCE: ESRI; EnviroMine; The Altum Group; Chang Consultants; ESA; SanGIS

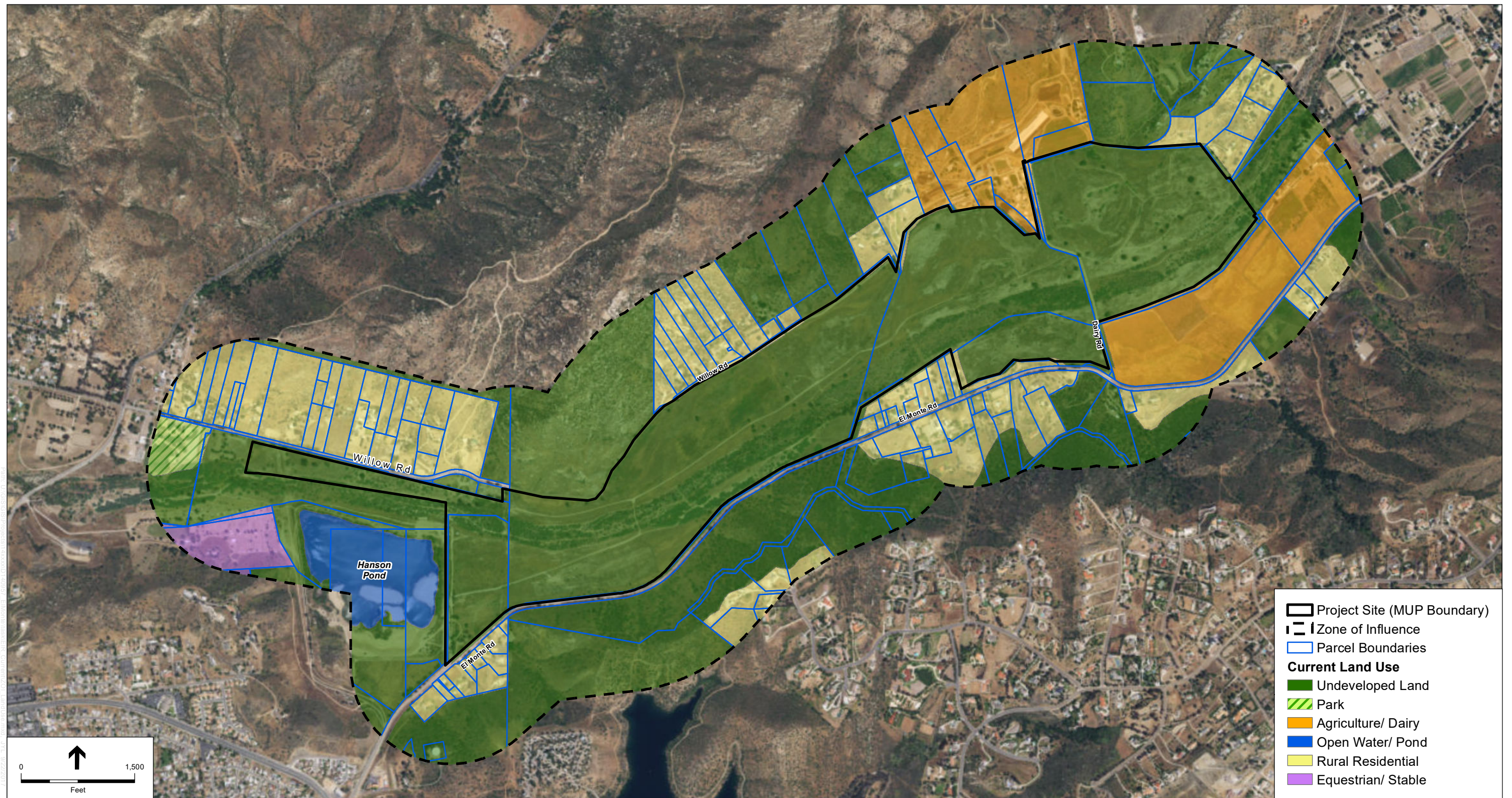
El Monte Sand Mining Project . 140957

Figure 3.1-1
Existing Zoning



SOURCE: ESRI; EnviroMine; The Altum Group; Chang Consultants; ESA; SanGIS

El Monte Sand Mining Project . 140957
Figure 3.1-2
Soils and Farmland Classification



SOURCE: ESRI; EnviroMine; The Altum Group; Chang Consultants; ESA; SanGIS

El Monte Sand Mining Project. 140957
Figure 3.1-3
 Existing Onsite and Surrounding Land Use