

4.2 AGRICULTURAL AND FORESTRY RESOURCES

4.2.1 Introduction

This section discusses the proposed La Entrada Specific Plan's (proposed project) compatibility with agricultural and forestry uses in the City of Coachella (City) and the County of Riverside (County) and analyzes the proposed project's consistency with local and State agricultural policies and regulations. The analysis contained in this section is based in part on the following reference documents and data sources, including:

- A Guide to the Farmland Mapping and Monitoring Program, California Department of Conservation (CDC), Division of Land Resources Protection, 2004 Edition.
- California Land Evaluation and Site Assessment (LESA) Model, Instruction Manual, CDC, Office of Land Conservation, 1997.
- Agricultural Element, City of Coachella General Plan, adopted 1996.
- Riverside County Land Use Conversions, 1998–2000, 2000–2002, 2002–2004, 2004–2006, 2006–2008, 2008–2010, CDC, Division of Land Resources Protection.
- Riverside County 2011 Agricultural Production Report, 2011.

The LESA Model worksheets prepared for the various project sites are included as Appendix C to this Environmental Impact Report (EIR).

4.2.2 Methodology

The methodological analysis underlying this section of the EIR consists of the following:

Agricultural Resources.

- First, analysis of the Farmland Mapping and Monitoring Program (FMMP) to determine whether the proposed project site contains or consists of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as determined by the FMMP maps.
- Second, the analysis evaluates the current General Plan land use designations and zoning applicable to the site to determine the existence of any conflicts between the proposed project and any potential existing agricultural General Plan and zoning designations applicable to the site.
- Third, the analysis evaluates the current La Entrada Specific Plan land use designations applicable to the site.
- Finally, the California LESA Model, developed by the CDC, is used to quantify any potential impacts that the proposed project may have on agricultural resources. Utilization of the LESA

Model is currently considered to be the most reliable method by which to determine a project's potential impacts on agricultural resources.

In the late 1980s and the early 1990s, the CDC and the State Legislature began exploring ways by which local agencies could analyze the specific impacts of local projects on the conversion of farmland in a manner that was consistent throughout the State. At that point in time, reference to the FMMP maps was the only widely utilized methodological approach to analyzing conversion impacts, and oftentimes, the FMMP maps were outdated and/or did not contain specific data on local conditions that better explain whether local land contains viable farmland. Federal and State agencies were and are cognizant of the fact that determining the true significance of agricultural conversions is a function of understanding the specific characteristics affecting a particular site proposed for conversion. In order to create a more detail-orientated methodological approach to assessing agricultural impacts, following the preparation of several State and federal studies, the CDC developed the LESA Model as an optional method by which local agencies could assess the impacts of land conversion on agricultural resources (California Agricultural Land Evaluation and Site Assessment Model, Instruction Manual, 1987).

This EIR utilizes the LESA Model as one of the analytical tools by which to assess the proposed project's impacts on agricultural conversion. Appendix G of the *California Environmental Quality Act (CEQA) Guidelines* states as follows: "In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland." Further, as stated above, the LESA Model was specifically created by the CDC in order to provide "specific guidance concerning how agencies should address farmland conversion impacts" (California Agricultural Land Evaluation and Site Assessment Model, Instruction Manual, 1987, p. 3.).

The conversion of agricultural land to nonagricultural uses is a result of various economic and demographic factors. Increased costs for water and a continuing demand for housing and commercial development in the City and region have provided the primary impetus for this agricultural land conversion. The LESA Model uses six different factors (two based on soil resource quality and four based on on-site and adjacent land characteristics) to develop a weighted score that identifies the significance of potential impacts to agricultural resources. The Land Evaluation (LE) scoring utilizes two soil factors. The Land Capability Classification (LCC) indicates the suitability of soils for most kinds of crops, and the risk of damage when they are used in agriculture, while the Storie Index provides a numeric rating (0–100) of the relative degree of suitability or value of a given soil for intensive agriculture. The Site Assessment (SA) scoring considers the size of the site to be converted, water supply restrictions in drought and nondrought years, and the presence (or absence) of adjacent agricultural, habitat, or parkland uses.

By assessing and weighing a variety of soil, water, and land use characteristics, it is possible that the conversion of a large parcel containing poor soils and with limited access to water would not result in a significant impact, while the conversion of a much smaller well-watered parcel with quality soils could be considered significant. To ensure that potential impacts to adjacent agricultural activities are appropriately considered, the LESA Model requires an examination of land use on all parcels within a Zone of Influence (ZOI) that extends a minimum 0.25 mile (mi) from the actual boundary of the site.

For any site evaluated using the LESA Model, the factors are rated, weighed, and combined, resulting in a single numeric score that becomes the basis for determining a project’s potential significance.

For purposes of this EIR analysis, the LESA Model was utilized to determine the entire project’s impact to on-site and adjacent agricultural uses. The results of this analysis are provided under Threshold 4.2.5, which focuses on the conversion of farmland to nonagricultural use on the entire project site. The analysis provided under Threshold 4.2.1 focuses on the area (e.g., extension of Avenue 50) that is actively under agricultural cultivation and the impacts associated with the conversion of active State designated farmland to nonagricultural uses.

Forestry Resources. The California Department of Forestry and Fire Protection maintains Forest and Range Assessments under the Fire and Resource Assessment Program (FRAP). Forestry and Timber Maps from that program can identify any forest or forestry resources within the State.

4.2.3 Existing Environmental Setting

Agriculture is an important economic segment for California, which is the leading agriculture producing State in the nation. Riverside County is the leading agriculture producing county in Southern California. This is reflected by the fact that agricultural production is the leading industry in the County in terms of dollar value and is a substantial source of employment for County residents.

Table 4.2.A shows the values of major crop groupings in Riverside County for the last five reporting periods. As indicated in Table 4.2.A, the estimated gross value of agricultural products in Riverside County increased from approximately \$1.09 billion in 2010 to \$1.28 billion in 2011, a 17 percent increase.

Table 4.2.A: Estimated Gross Value of Agricultural Products (dollars)

Crop Type	Reporting Period				
	2011	2010	2009	2008	2007
Citrus	119,942,513	140,500,922	101,652,000	135,759,800	121,387,100
Tree and Vine (includes vineyards)	232,649,262	164,993,960	191,682,600	173,678,000	189,286,500
Vegetables, Melons, Miscellaneous	278,628,295	292,002,337	221,286,700	266,414,900	234,854,700
Field and Seed	149,198,052	81,328,229	69,699,800	123,545,400	94,492,000
Nursery	200,154,964	169,341,300	206,499,900	230,416,200	272,326,200
Livestock and Poultry	292,030,380	235,926,225	214,672,800	321,060,900	338,938,600
Total	1,282,256,116	1,093,646,349	1,015,755,300	1,268,589,900	1,265,063,200

Source: Riverside County 2011 Agricultural Production Report, 2011.

Note: The most recent agricultural production report available from Riverside County was for the 2011 reporting period; the 2012 reporting period has not been released.

The City is located on the edge of the Coachella Valley’s traditional agricultural region. This eastern valley city is famous for its large year-round farm and fruit agriculture, contributing a sizable share of the County’s lemon, orange, date, and grapefruit production. Migrant workers and their families make up a large portion of the City population and culture. Growers within the City include Peter Rabbit Farms, Prime Time International, Anthony Vineyards, and SunDate.

Within the City's planning area, there are approximately 21,840 acres (ac) of agricultural land, 3,800 ac in the incorporated area and 18,040 ac in the unincorporated area. This land is primarily located to the east and south of the existing urbanized area of Coachella. There are a substantial number of date groves and citrus orchards in the area, as well as grape, lettuce, corn, and carrot production.¹ As noted in the existing setting of the City's General Plan Agricultural Element, agriculture plays an important role in the economic, social, and physical fabric of Coachella; however, increasing urbanization will tend to displace agricultural land over time. The General Plan states that it is important to retain a critical mass of productive agricultural land to maintain Coachella's identity and support the agricultural component of its economy.

In addition to the production and sale of crops, agriculture has the potential to contribute to Coachella's identity as a tourist destination by incorporating visitor-serving areas such as tasting rooms, produce stands, and agricultural demonstration projects.² As urbanization increases, the potential for land use conflicts between agricultural and urban uses will also grow. Provision of transitional interfaces between agricultural lands and future adjacent urban development is important.

The La Entrada Specific Plan site is generally bound by Interstate 10 (I-10) to the north, the Coachella Branch of the All American Canal (Coachella Canal) to the west and south, and the Little San Bernardino Mountains to the east. The project site includes property from the west into the site to accommodate the proposed extensions of Avenue 50 and Avenue 52 that would provide access to the project site (see Section 3.0, Project Description). Developed properties in the vicinity include an energy transfer substation (adjacent to Avenue 52); agricultural uses to the west; and undeveloped property to the north, south, and east. Active agricultural operations take place on properties located west of the project site.

Based on review of historic land uses illustrated by maps and aerial photographs, there is no evidence that the majority of the project site has been previously used for agricultural purposes. On the project site, there is evidence of past activity, including an abandoned segment of I-10 along the northern portion of the project site, an electric transmission line along the southern border of the project site, and a small power line located in the center of the site.

Figure 4.2.1 details farmland designations of the project site. The majority of the project site is designated as "Other Land." One small area located along the northwest portion of the site (where future Avenue 50 would be extended) is designated "Prime Farmland" and "Unique Farmland." The proposed project site abuts Prime Farmland, Unique Farmland, and Farmland of Local Importance to the northwest and southwest. A description of farmland classifications is provided in Section 4.2.4 under State Policies and Regulations.

4.2.4 Regulatory Setting

Federal Policies and Regulations.

Farmland Policy Protection Act. The Farmland Policy Protection Act (FPPA) was passed in 1981 in an effort to minimize the impact that federal programs have on the conversion of farmland to nonagricultural uses. In addition, the FPPA ensures that federal programs are

¹ *Agricultural Element, Coachella General Plan 2020, City of Coachella, September 1996.*

² *Existing Setting - Agricultural Element, Coachella General Plan 2020, City of Coachella, September 1996.*

consistent with State, local, and private programs and policies to protect farmland.¹ Because no federal agency or funding is involved in the proposed project, the FPPA would not apply.

State Policies and Regulations.

California Government Code Sections 51290–51295. These sections regulate the acquisition and use of agricultural preserve lands for any federal, State, or local public improvements or public utilities improvements. If the use of agricultural preserve land is deemed necessary for a public use or if agricultural preserve land has been acquired, the public agency and/or person acquiring land is required to notify the CDC of these actions. Exceptions to locating public improvements on agricultural preserve land are (1) when the location is not based primarily on lowering the cost of acquiring land in an agricultural preserve, and (2) if the land is under a contract for any public improvement and there is no other land within the preserve on which it is feasible to locate the public improvement. Because the project site is not located within the County's designated Agricultural Preserves² or the City's Agricultural Reserve (A-R) Zone (refer to EIR Figure 4.10.4 – Existing Zoning Designations), Government Code Sections 51290–51295 are not applicable to the proposed project.

California Government Code Section 65570. The California Government Code (Section 65570) requires the collection and reporting of agricultural land use acreage and conversion by June 30 of each even-numbered year. Utilizing data from the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey and current land use information, the CDC FMMP compiles important farmland maps for each county within the State. Maps and statistics are produced biannually using a process that integrates aerial photo interpretation, field mapping, a computerized mapping system, and public review. These maps delineate land use in eight mapping categories (and one overlay category) and represent an inventory of agricultural soil resources within Riverside County. The categories of land shown on these maps are listed below.

- **Prime Farmland.** Prime Farmland is land that has the best combination of physical and chemical characteristics for the production of crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods. Prime Farmland is land that has been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date. It does not include publicly owned lands for which there is an adopted policy preventing agricultural use.
- **Farmland of Statewide Importance.** Farmland of Statewide Importance is land other than Prime Farmland that has a good combination of physical and chemical characteristics for the production of crops. Farmland of Statewide Importance is land that is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to hold and store moisture. It is land that has been used for the production of irrigated crops at some time

¹ http://www.farmlandinfo.org/index.cfm?function=article_view&articleID=29480, accessed March 25, 2013.

² Williamson Act Lands GIS Data Layer, accessed May 20, 2013.

during the two update cycles prior to the mapping date. It does not include publicly owned lands for which there is an adopted policy preventing agricultural use. The project site does not contain Farmland of Statewide Importance.

- **Unique Farmlands.** Unique Farmland is land that does not meet the criteria for Prime Farmland or Farmland of Statewide Importance and that has been used for the production of specific high economic value crops at some time during the two update cycles prior to the mapping date. It has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained high quality and/or high yields of a specific crop when treated and managed according to current farming methods. It is usually irrigated, but may include nonirrigated orchards or vineyards as found in some climatic zones in California. Examples of Unique Farmland crops include oranges, olives, avocados, rice, grapes, and cut flowers.
- **Farmland of Local Importance.** Farmland of Local Importance is either currently producing crops, has the capability of production, or is used for the production of confined livestock. Farmland of Local Importance is land important to the local agricultural economy, as determined by each county's Board of Supervisors and local advisory committees (i.e., dairies, dryland farming, aquaculture, and uncultivated areas with soils qualifying for Prime Farmland and Farmland of Statewide Importance).

Farmland of Local Importance in Riverside County is defined as:

- Lands with soils that would be classified as Prime and Statewide Farmland but lack available irrigation water;
 - Lands planted with dryland crops of barley, oats, and wheat;
 - Lands producing major crops for Riverside County but that are not listed as Unique crops. These crops are identified as returning one million or more dollars on the 1980 Riverside County Agriculture Crop Report. Crops identified are permanent pasture (irrigated), summer squash, okra, eggplant, radishes, and watermelons;
 - Dairylands, including corrals, pasture, milking facilities, hay, and manure storage areas, if accompanied with permanent pasture or hayland of 10 ac or more;
 - Lands identified by city or county ordinance as Agricultural Zones or Contracts, which includes Riverside City "Proposition R" lands; and
 - Lands planted with jojoba (shrub, commercially grown for oil) which are under cultivation and are of producing age.
- **Grazing Land:** Land on which the existing vegetation, whether grown naturally or through management, is suitable for grazing or browsing of livestock.
 - **Urban and Built-up Land:** Land used for residential, industrial, commercial, construction, institutional, or public administrative purposes such as railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. Highways, railroads, and other transportation facilities also are included in this category.
 - **Other Land:** Land not included in any of the other mapping categories. Common examples include low-density rural developments, brush, timber, wetland, and riparian areas not

- suitable for livestock grazing, confined livestock, poultry or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 ac.
- **Water:** Water areas with an extent of at least 40 ac.
 - **Land Committed to Nonagricultural Use:** This optional designation is an overlay to the standard farmland categories and represents existing farmland and grazing land and vacant areas that have a permanent commitment for development. Examples of Land Committed to Nonagricultural Use would include an area undergoing permanent infrastructure installation or for which bonds or assessments have been issued for public utilities. Such lands represent planning areas where there are commitments for future nonagricultural developments that are not reversible by a simple majority vote by a City Council or Board of Supervisors.

Williamson Act. The California Land Conservation Act of 1965, also referred to as the Williamson Act, is a nonmandated State program administered by counties and cities for the preservation of agricultural land. This program enables local governments to enter into contracts with private landowners to restrict specific parcels of land to agricultural or related open space use. In return, landowners receive much lower property tax assessments than normal because the assessments are based on farming and open space uses rather than full market value.

Participation in the program is voluntary on the part of both landowners and local governments, and it is implemented through the establishment of Agricultural Preserves and the execution of Williamson Act contracts. Individual property owners enter into a contract that restricts or prohibits development of their property to nonagricultural uses during the term of the contract in return for lower property taxes. Initially signed for a minimum 10-year period, the contracts are automatically renewed each year for a successive minimum 10-year period unless a notice of nonrenewal is filed, or a contract cancellation is approved by the local government. The project site is not subject to a Williamson Act Conservation contract.¹

State Forestry Laws. Title 14 of the California Public Resources Code governs the designation and monitoring of forests and forest resources within the State. In addition, the State Board of Forestry and Fire Protection administers the “Forest Practice Rules” for professional foresters and their activities in the State.

Forest Taxation Reform Act of 1976 and the Z’berg-Nejedly Forest Practice Act of 1973–California Forest Practice Act. These Acts provide for the preservation of forest lands from encroachment by other incompatible land uses and provide for oversight of the management of forest practices and forest resources in California. As no forest or timber resources are located within the City, no further discussion of these State regulations is warranted.

¹ Williamson Act Lands GIS Data Layer, accessed May 20, 2013.

Local and Regional Plans and Policies.

Coachella Municipal Code.

*Chapter 17.10 A-R Agricultural Reserve Zone, **17.10.010 Intent and Purpose.*** This zone is intended to preserve certain designated prime agricultural lands within the city and protect those lands, which are deemed to be agricultural preserves, from the intrusion of urban development incompatible with agricultural land uses. This zone designation is reserved for only those lands which are subject to recorded Williamson Act contracts pursuant to Government Code, Section 51200 et seq. (prior code Section 018.01).

The following policies from the City's General Plan Agricultural and Conservation Elements encourage the conservation of agricultural land within the City.

City of Coachella General Plan, Agricultural Element.

Policy: The City shall encourage urban development to locate in areas which are not designated Agriculture (AG) on the Land Use Policy Diagram.

Policy: The impacts of agriculture on residential development include noise, dust, aerial spraying and farm worker housing. The City shall require residential development on parcels adjacent to lands designated Agriculture (AG) to provide an assessment of impacts from adjacent agricultural uses and recommend buffers and other design features to mitigate the impacts.

Policy: The City shall encourage cluster development on residential parcels adjacent to lands designated Agriculture (AG) placing dwellings as far as possible from agricultural lands. The use of green belts or open space areas ranging from 100 feet to 300 feet in width and containing landscaping, fencing and other buffer elements is recommended.

City of Coachella General Plan, Conservation Element.

Goal: The City shall protect soil from erosion and from the buildup of salts on productive agricultural lands.

Objective: Conservation of soils is warranted to ensure an adequate supply for agricultural purposes in the future.

Policy: The City shall designate as Agricultural (AG) on the Land Use Policy Diagram significant areas of prime soil that are currently under agricultural production. These areas shall be encouraged to remain in open space.

4.2.5 Project Design Features

As summarized in Chapter 3.0, Project Description, the proposed Specific Plan includes components that are referred to as Project Design Features. The Project Design Features related to agricultural and forestry resources are:

- Interim agricultural uses as defined in Section 4.0 of the Specific Plan shall be permitted in any planning area ultimately planned for development uses prior to entitlement for the areas' primary permitted uses.
- Agricultural and community garden uses are permitted within park areas of the Specific Plan.

4.2.6 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact related to Agricultural Resources if it would:

- Threshold 4.2.1:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use;
- Threshold 4.2.2:** Conflict with an existing zoning for agricultural use, or a Williamson Act contract;
- Threshold 4.2.3:** Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code section 12220 (g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g));
- Threshold 4.2.4:** Result in the loss of forest land or conversion of forest land to nonforest use; or
- Threshold 4.2.5:** Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use.

4.2.7 Project Impacts

- Threshold 4.2.1:** **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use**

Significant Adverse Impact. As discussed above, the CDC Office of Land Conservation publishes a Farmland Conversion Report every 2 years as part of its FMMP. These reports document land use conversion by acreage for each California county. The most recent data are for the 2008–2010 period,

during which Riverside County experienced a net loss of 3,300 ac of Prime Farmland, 567 ac of Farmland of Statewide Importance, and 1,742 ac of Unique Farmland. The amount of Important Farmland inventoried in Riverside County during the last countywide survey of farmland totaled 428,989 ac.

As noted in Chapter 3.0, the proposed project requires extension of the existing roadway network in the project vicinity to provide site access; specifically, Avenue 50 and Avenue 52 are required for site access and to support the proposed project's street network.

As illustrated in Figure 4.2.1, the location of all State-designated farmlands for the project site is within the area proposed for the extension of Avenue 50. The proposed extension of Avenue 50 across the Coachella Canal would go through an existing vineyard, resulting in the conversion of approximately 0.025 ac of Prime Farmland and 9.5 ac of Unique Farmland. This would result in the conversion of existing State-designated active farmland to a nonagricultural roadway use. Due to the physical design constraints associated with the Avenue 50 alignment (e.g., the need to cross the Coachella Canal), the loss of approximately 0.025 ac of active Prime Farmland and 9.5 ac of active Unique Farmland cannot be avoided, and no feasible mitigation is available. The loss of this agricultural resource would be considered an unavoidable significant and adverse impact due to the resource value placed on farmland of this designation. The conversion of the 0.025 ac of on-site Prime Farmland would be equivalent to 0.00075 percent of the total loss of Prime Farmland in the County during the 2008-2010 period. Similarly, the conversion of the 9.535 ac of on-site Unique Farmland would be equivalent to 0.54 percent of the total loss of Unique Farmland in the County during this period. However, because Prime Farmland and Unique Farmland are considered to be a finite and irreplaceable resource, the conversion to a nonagricultural use is a significant impact.

For the Avenue 52 roadway extension, the proposed roadway alignment would not traverse through any existing and active agricultural uses. In addition, the area for the Avenue 52 roadway extension does not contain any State-designated farmland. In the absence of any on-site City or State-identified significant agricultural resource, as well as the current/recent lack of on-site agricultural activities, no conversion of State-designated farmland would occur with implementation of the Avenue 52 extension. Therefore, the proposed extension of Avenue 52 would not result in any significant impact to agricultural resources in the City.

Threshold 4.2.2: Conflict with an existing zoning for agricultural use, or a Williamson Act contract

No Impact. The proposed project site is not covered under a Williamson Act Contract,¹ therefore, the project would not conflict with any Williamson Act contract. Because the project would not conflict with any Williamson Act contract, no impacts related to this issue would occur with implementation of the proposed project. No mitigation is required.

As illustrated in Figure 4.10.4 (Zoning Designations), the 1,612 ac portion of the project site located within the City is currently zoned as C-G (General Commercial), R-M (Residential Multiple Family), R-S (Residential Single Family), and O-S (Open Space). The 588 ac portion of the project site located

¹ Williamson Act Lands GIS Data Layer, accessed May 20, 2013.

within the County is zoned as O-S (Open Space). The areas of the two proposed extensions of Avenues 50 and 52 are currently zoned as A-T (Agricultural Transitional) and O-S (Open Space).

As identified in the City's Municipal Code, this zone has the purpose of permitting the continued agricultural use of those lands suited to eventual development in other uses and zones, pending proper timing for the economical provisions of utilities, major streets, and other facilities so that compact, orderly development will occur.¹ The extension of Avenue 50 and Avenue 52 would be considered to be the provision of new major streets so that orderly development (e.g., La Entrada Specific Plan) would occur. Therefore, the extension of the Avenue 50 and Avenue 52 would be consistent with the Agricultural Transitional zoning designation. Since the proposed project would not conflict with existing zoning for agricultural uses in these areas, no impacts associated with this issue would occur, and no mitigation measures are required.

Threshold 4.2.3: Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code section 12220 (g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))

No Impact. As previously stated, the portion of the proposed project that is located within the City is currently zoned as C-G (General Commercial), R-M (Residential Multiple Family), R-S (Residential Single Family), O-S (Open Space), and A-T (Agricultural Transitional) while the portion of the project site that is located in the County is zoned O-S (Open Space). Therefore, no portions of the project area are zoned for timberland or timberland development. Since development of the proposed project would not conflict with existing zoning for forest land or timberland, there would be no impacts to forest land or timberland resources, and no mitigation is required.

Threshold 4.2.4: Result in the loss of forest land or conversion of forest land to nonforest use

No Impact. The State FRAP mapping does not indicate any forest resources within the City.² In addition, the City's General Plan does not show or discuss any lands that contain forest or forestry resources within the City limits or its Sphere of Influence. The project site does not support wilderness, timberlands, or forestry resources does not contain any forest land. Therefore, development of the proposed project would not result in the loss of forest land or conversion of forest land to a nonforest use, and no mitigation would be required.

¹ *Article 020: A-T Agricultural Transition Zone, Zoning Ordinance, Coachella Municipal Code*, <http://www.coachella.org/DocumentCenter/Home/View/124>, website accessed May 23, 2013.

² *Land Cover Multi-Source Data Compiled for Forest and Range 2003 Assessment*, Fire and Resource Assessment Program - California Department of Forestry and Fire Protection, 2003, http://frap.cdf.ca.gov/webdata/maps/statewide/fvegwhr13_map.pdf, site accessed May 20, 2013.

Threshold 4.2.5: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use

Less than Significant Impact. To assess potential agricultural resource impacts that may result from development of the proposed site, the LESA Model was run for the project site. Table 4.2.B details the results of the LESA analysis, while Table 4.2.C identifies the significance determinations based on the LESA scoring system. The worksheets detailing the variables considered during the evaluation of each site are included as Appendix C, Land Evaluation and Site Assessment worksheets.

Table 4.2.B: Project Land Evaluation and Site Assessment Scoring

Factor Name	Factor Rating (0–100 Points)	×	Factor Weighting (Total = 1.00)	=	Weighted Factor Rating
Land Evaluation					
1. Land Capability Classification	20.80	×	0.25	=	5.2
2. Storie Index Rating	23.30	×	0.25	=	5.8
Land Evaluation (LE) Subscore					11
Site Assessment					
1. Project Size	100.00	×	0.15	=	15
2. Water Resource Availability	28.29	×	0.15	=	4.2
3. Surrounding Agricultural Land	0.0	×	0.15	=	0
4. Protected Resource Lands	0.0	×	0.05	=	0
Site Assessment (SA) Subscore					19.2
TOTAL LESA SCORE (LE + SA)					30.2

Source: LSA Associates, Inc., May 2013.

Table 4.2.C: Land Evaluation and Site Assessment Model Significance Determination

Total LESA Score	Scoring Decision
0–39 Points	Not considered significant
40–59 Points	Considered significant <i>only</i> if LE and SA subscores are each <i>greater</i> than or equal to 20 points
60–79 Points	Considered significant <i>unless</i> either LE or SA subscore is <i>less</i> than 20 points
80–100 Points	Considered significant

Source: California Land Evaluation and Site Assessment Model, Instruction Manual, State of California Department of Conservation, Office of Land Conservation, 1997.

LE = Land Evaluation

SA = Site Assessment

LESA = Land Evaluation and Site Assessment

The type of soils located on site combined with the location of the site relative to the amount and quality of agricultural operations within the ZOI for the site and the absence of Protected Resource Land results in low LE and SA subscores. As noted in Table 4.2.B, the LESA score for the proposed project site (30.2 points) does not exceed the thresholds identified in Table 4.2.C that would indicate a significant agricultural resource impact. As established by the completion of the LESA Model for the

proposed development area, no significant agricultural resource impacts would result from the conversion of the site to nonagricultural uses.

The conversion of a project site from a current undeveloped condition to urban uses would represent a direct impact. However, indirect CEQA impacts could occur in the event a proposed project hastened or contributed to the conversion of adjacent agricultural properties to nonagricultural uses. The scope of these types of indirect impacts is assessed in this section of the DEIR.

Whether adjacent agricultural land is developed depends on several factors, including market demand, availability of property, profitability of the agricultural use, and the landowner's interest in continuing farming. As stated previously, one of the factors considered in the preparation of the LESA Model is the land uses located within each site's ZOI. The amount of agricultural land within the ZOI for the project site is approximately 17 percent of the land in that ZOI. The condition and use of land adjacent to the project site was assessed in the LESA Model prepared for this project. As discussed previously, the results of the LESA Model concluded that the conversion of the site to nonagricultural uses would not result in a significant agricultural resource impact.

4.2.8 Mitigation Measures

As previously stated under Threshold 4.2.1, the proposed project includes and requires extension of Avenue 50 to provide site access and support to the proposed project's street network. The extension of Avenue 50 would result in the permanent loss of approximately 0.025 ac of Prime Farmland and 9.5 ac of Unique Farmland.

Demographic increases, coupled with the availability of developable land and the rising cost of water, increasingly exert pressure on the owners/operators of agricultural operations to sell and/or convert agricultural lands to nonagricultural uses. The CDC has identified potential "conservation tools" available to mitigate for the loss of agricultural land. These include the purchase of agricultural conservation easements; transfer of development rights; acquisition of farmland by the city or county; mitigation banking; the establishment of "urban limits," greenbelts, and buffers; the payment of in-lieu fees sufficient to purchase and maintain farmland conservation easements; and planning tools such as clustering development, use of density bonuses, and limiting "leapfrog" development.

Various techniques and programs have been utilized in selected areas of the State to mitigate for the loss of State-designated Farmland and/or to ensure the continued economic viability of agricultural operations. For example, the City of Davis requires the granting of a farmland conservation easement or other conservation mechanism for twice the amount of agricultural land being converted to a nonagricultural uses; or the payment of in-lieu fees based upon a two-to-one mitigation requirement.¹ In its "Agricultural Lands Conversion Ordinance," Yolo County requires a one-to-one replacement of converted agricultural lands, either through the granting of a conservation easement, or payment of in-lieu fees. Generally, mitigation lands are required to have similar soil quality, water supply adequacy, and should be in relative proximity to the lands being converted.²

¹ Chapter 40 (Right to Farm and Farmland Preservation), City of Davis Municipal Code.

² Yolo County General Plan Agricultural Element, November 2002.

The CDC's California Farmland Conservancy Program (CFCP) seeks to encourage the long-term, private stewardship of agricultural lands through the voluntary use of agricultural conservation easements. Implementation of conservation easements is typically achieved either through (1) the outright purchase of easements, or (2) the donation of mitigation fees to a local, regional, or statewide organization whose purpose includes the acquisition and stewardship of conservation easements. Additional agricultural conservation easements have been funded by various entities without the use of CFCP funds. While the amount of CFCP grants varies depending on location, farmland type, and size, CFCP grants to conservancy agencies made to offset the cost of purchasing agricultural conservation easements has averaged approximately \$3,000/ac statewide.¹

Although the City has policies encouraging the preservation of agricultural land, the City does not currently utilize a banking or fee program to mitigate impacts to agricultural soils or lands. Therefore, the City does not have a mechanism available to mitigate the permanent loss of agricultural land. Because State-designated Farmland is a finite resource, the loss of 0.025 ac of on-site Prime Farmland and 9.535 ac of Unique Farmland is significant. While the proposed project would result in the conversion of State-designated Farmland, development of this site and the surrounding area is consistent with the long-term vision of the City as outlined in the General Plan and pursuant to the City's prior approval of the preceding McNaughton Specific Plan on the project site. In addition, there are no local or regional agricultural conservation banks operated by the County.

Potential mitigation measures exist that would reduce the impact related to the loss of agricultural resources within the City. These potential mitigation measures include:

- Enrolling productive agricultural land, not presently under contract, under a Williamson Act Contract;
- Providing protection to ongoing agricultural operations from complaints and nuisance complaints from adjacent new development;
- Protecting productive agricultural land subject to conversion through the purchase of or transfer of its development rights;
- Purchasing conservation easements on existing agricultural land to ensure that the land is never converted to urban uses; and
- Donating funds to a regional or statewide program that promotes and implements the use of agricultural land conservation easements.

Mitigation measures must be feasible and fully enforceable through permit conditions, agreements, or other legally binding considerations. To be feasible, mitigation must be capable of being accomplished in a successful manner within a reasonable period of time, taking into account the economic, environmental, legal, social, and technological factors.²

The potential mitigation measures identified by the City listed previously are not considered to be feasible by the City. Williamson Act contracts are entered into voluntarily by property owners, and the City cannot force owners to participate in this program. The City does have the ability to encourage property owners to participate in Williamson Act programs; however, this is expected to

¹ <http://www.conservation.ca.gov/dlrp/cfcp/stories/Pages/Index.aspx>, site accessed May 20, 2013.

² *CEQA Guidelines*, Sections 15126.4 and 15364.

result only in temporary preservation of agricultural land since property owners have the option of nonrenewal of these contracts at any time after the 10-year contract period ends. The land would then be available to be developed with nonagricultural uses.

Providing protection for ongoing agricultural activities from new developments, such as requiring buffers between agricultural operation and new development or requiring the notification and disclosure of agricultural activities to the purchasers of adjacent properties, will not permanently retain or protect agricultural land.

The purchase or transfer of development rights, purchase of conservation easements, or donation of funds to assist in the conservation of agricultural land would need to be implemented to ensure the preservation of agricultural land. As stated previously, the City anticipates that there will be some conversion of agricultural land within the City. The City expects that a portion of the land within the City will be converted to urban uses, although some agriculture will continue, as allowed by the City’s Development Code for all zoning categories. However, as noted above, the measures identified are not feasible, and alternative mitigation has not been identified. As such, impacts related to this issue remain significant and unavoidable.

4.2.9 Cumulative Impacts

The cumulative area for agricultural resource impacts is Riverside County. As detailed in Table 4.2.D, the agricultural acreage inventoried in Riverside County by the FMMP has declined in each of the five past reporting cycles. As noted in Table 4.2.E, the total planted acreage in Riverside County has decreased between 2007 and 2009. In 2010, Riverside County saw an increase in total planted acreage countywide followed by a slight decrease in 2011.

Table 4.2.D: Agricultural Acreage Inventoried

	Reporting Period				
	2010	2008	2006	2002	2000
Riverside County	428,989	433,877	444,455	479,278	609,535

Source: Table A-25 Riverside County 2008-2010 Land Use Conversion, CDC, 2013.

Note: Though designated agricultural land, acreage may not necessarily be planted or otherwise used for agricultural uses. The most recent reporting period available from the CDC was for the 2010 reporting period; the 2012 reporting period has not been released.

CDC = California Department of Conservation

Table 4.2.E: Planted Acreage

	Reporting Period				
	2011	2010	2009	2008	2007
Riverside County	209,710	209,913	202,066	246,012	214,050

Source: Riverside County 2011 Agricultural Production Report, 2011.

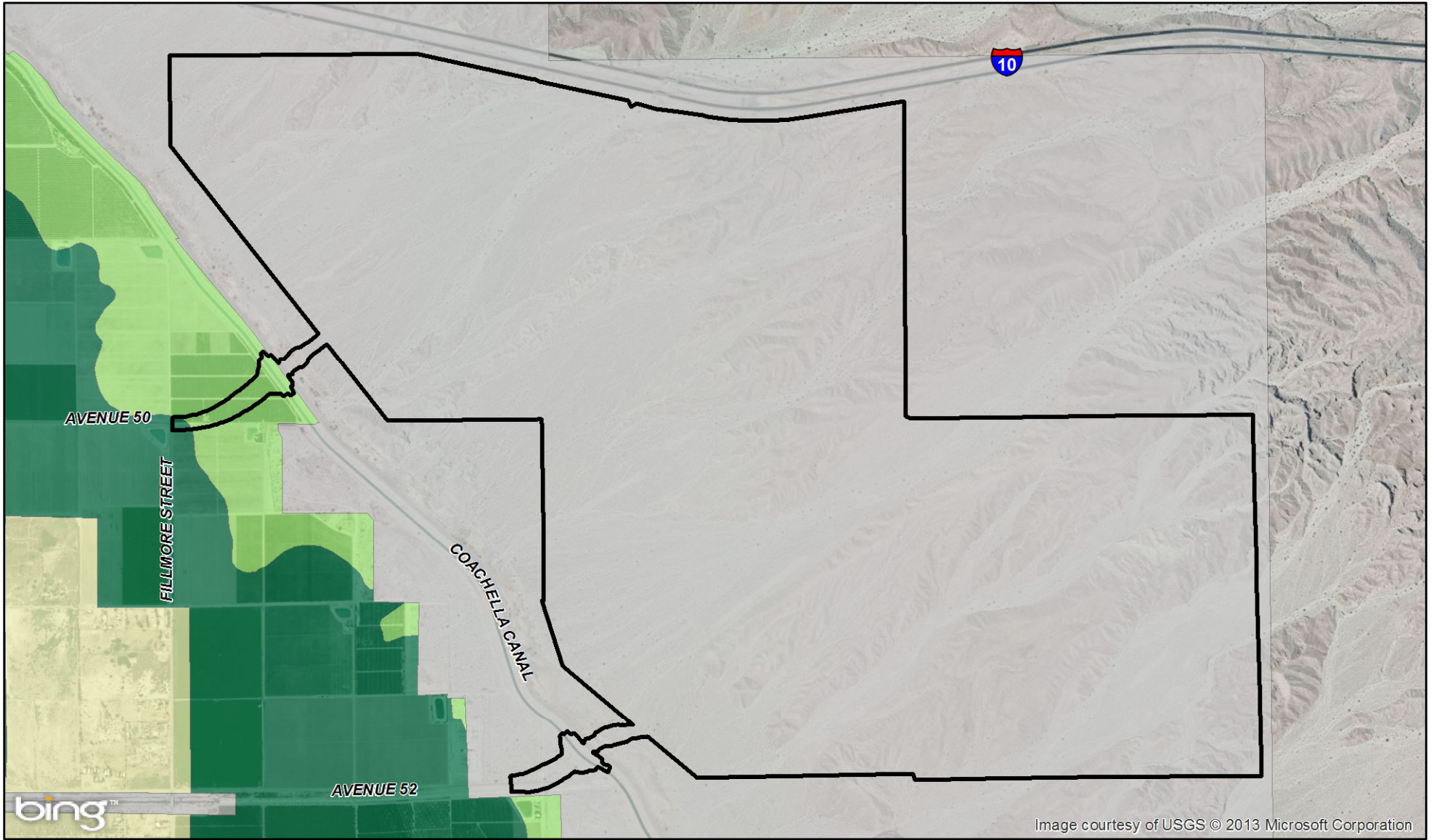
Note: The most recent agricultural production report available from Riverside County was for the 2011 reporting period; the 2012 reporting period has not been released.

As discussed previously, in 2011, Riverside County generated approximately \$1.28 billion of revenue value associated with agricultural operations and products.¹ In addition, the City has identified agriculture as a valuable resource on which the local economy is dependent. Even with City policies aimed at discouraging the conversion of farmland, as the area continues to develop and populate in the future, the development pressure on agricultural lands is anticipated to increase. Although the loss of approximately 9.5 ac is relatively small (less than 1/100 of a percent) compared to the total agricultural land in the City (21,840 ac), the loss would be permanent and would contribute to an overall loss of agricultural resources in the City. Since there is no feasible mitigation for this loss, the proposed project's contribution to the cumulative loss of valued agricultural lands countywide is considered an unavoidable and significant impact on a cumulative basis, as well as on a project-specific basis.

4.2.10 Significant Unavoidable Adverse Impacts







The proposed project would result in significant unavoidable adverse impact related to the conversion of Prime Farmland and Unique Farmland to a nonagricultural use. As stated previously, the conversion of approximately 0.025 ac of Prime Farmland and 9.5 ac of Unique Farmland would be considered a permanent loss. No feasible mitigation measures are available to offset such impacts to this agricultural resource on a project-specific and cumulative level.

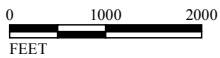
¹ *Total Valuation – F.O.B.*, Riverside County Agricultural Production Report, Riverside County Agricultural Commissioner's Office, 2011.



L S A

LEGEND

- | | |
|---|--|
|  Project Location |  Farmland of Local Importance (L) |
|  Prime Farmland (P) |  Other Land (X) |
|  Unique Farmland (U) |  Not Surveyed (Z) |



SOURCE: Bing (c.2012); California Department of Conservation - Farmlands Monitoring and Mapping Program (2010)

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FIGURE 4.2.1

La Entrada Specific Plan
Farmland Designations

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