AGRICULTURAL RESOURCES STUDY

for the

PROPOSED
EAST AREA 1 SPECIFIC PLAN PROJECT

SANTA PAULA, CALIFORNIA

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EXECUTIVE SUMMARY

This agricultural resources study presents information on the existing agricultural production and capability of the East Area 1 Specific Plan area, located immediately east of the City of Santa Paula, California. The site is located within the planning area of the City of Santa Paula, as defined in the City's General Plan, and is identified as an urban expansion area in the General Plan. The City of Santa Paula is serving as lead agency as defined in the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 *et seq.* for the environmental review of this proposed project, as the City is responsible for the review and approval of the proposed Specific Plan and related discretionary actions.

The study provides information on the agricultural characteristics of the project site, the impacts associated with the conversion of agricultural land to non-agricultural use, and mitigation measures to avoid or lessen the significance of potential impacts. In addition to addressing the direct impacts of this proposed project, this study also addresses potential indirect impacts associated with permitting urban uses near existing agricultural uses located around this site.

The Specific Plan area is comprised of four contiguous parcels. None of the parcels in the East Area 1 Specific Plan area is under either the California Land Conservation Act of 1965 (Williamson Act) or Farmland Security Act contracts.

The majority of the site is currently cultivated with citrus and avocado orchards and a small portion is currently used for cultivation of row crops. Several paved and dirt access roads traverse the site and foothills to the north. The site contains some structures related to the long-term agricultural uses of the site consisting of houses, storage sheds, and a barn in the southern and southeastern portions of the site. The site also contains drainage ditches, earthen berms, and a network of irrigation pipes. Santa Paula Creek has been channelized along the west edge of the site. Haun Creek, which has not been improved, forms the eastern boundary of the site. Earth berms have been built on both sides of the creek by the property owners to provide flood protection for their properties.

The proposed East Area 1 Specific Plan would permit the development of educational, residential, commercial, light industrial and open space/park uses within the approximately 501-acre Specific Plan area. Of the 501 acres included in the proposed East Area 1 Specific Plan area, approximately 134 acres located on the northern edge of the site would be designated as open space and agricultural preserve in the Specific Plan with the existing agricultural production continuing on this portion of the site. Specifically, 55 acres of existing avocado orchards would remain in production on this portion of the site. Development would be permitted on the remaining 367 acres of the 501-acre site under the proposed Specific Plan.

The project site is within the Area of Interest and currently outside of the Sphere of Influence of the City of Santa Paula, as established by the Ventura Local Agency Formation Commission (LAFCO). The Ventura LAFCO is responsible for the review of a proposed amendment to the Sphere of Influence for the City to include the site, and annexation of the site to the City after the City has completed review of the project. In this role, the Ventura LAFCO is serving as a responsible agency as defined in the CEQA. The Ventura LAFCO recently adopted a policy requiring that specific information be submitted with any application for a proposal that would result in the conversion of agricultural lands to non-agricultural use. This study provides the information identified in this policy.

Specifically, the Ventura LAFCO requires that an application for any action that would result in the conversion of agricultural lands address the location of, and acreage totals for, prime and non prime agricultural land involved in the areas and adjacent areas using the definition of "prime" agricultural land contained in California Government Code Section 56064; the effects on agricultural lands within the proposal area; the effects on adjacent agricultural lands; and the effects on the economic integrity of the agricultural industry in Ventura County.

The City's General Plan identifies the project site as the East Area 1 expansion area. The General Plan addresses expansion of the City to include East Area 1 and includes specific implementation measures to promote the compatibility of urban uses in East Area 1 with the agricultural uses that will remain to the north and east of the project site.

The proposed East Area 1 Specific Plan site is also currently located in the Fillmore-Santa Paula Greenbelt. The greenbelt was adopted by resolution by the participating cities and County. The City of Santa Paula General Plan states, "The City intends to amend the agreement to remove 567 acres that are part of expansion areas East Area 1 and East Area 2."

The site will be separated from agricultural uses to the east by Haun Creek, which creates a natural buffer, and by the proposed detention basins and landscape features planned along the western edge of Haun Creek within the Specific Plan area. These portions of the Specific Plan area would be zoned Open Space (OS-2) in the East Area 1 Specific Plan as passive and active recreation areas containing no habitable structures.

The California Department of Conservation Division of Land Resource Protection Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts to California's agricultural resources. The State Important Farmland Maps show the relationship between the quality of soils for agricultural production and the land's use for agricultural, urban, or other purposes. The current State Important Farmland Map for Ventura County identifies 154 acres of the East

Area 1 Specific Plan area as Prime Farmland and 282 acres as Unique Farmland. The remainder of the Specific Plan area consists of 4 acres designated as Urban and 61 acres designated as Other Lands.

The United States Department of Agriculture (USDA) Soil Conservation Service ranks the limitation of soils for agricultural production using the Soil Capability Classification System. Capability classes range from Class I soil, which have few limitations for agriculture, to Class VII soils, which are unsuitable for agriculture. Generally, acceptable yields and profits are more difficult to obtain on soils in the higher Capability Classes. The proposed project site includes five soil types classified as Class I or Class II soils. Class I soils have slight limitations that restrict their use for agriculture and Class II soils have moderate limitations that restrict the choice of plants or require moderate conservation practices. Approximately 29 acres of the site contain Class I soils and 127 acres are identified as Class II soils.

The USDA Soil Conservation Service also developed the Storie Index to categorize the suitability of soils for agricultural use. This Storie Index considers specific soils functions such as drainage, slope, and nutrient deficiencies. A relatively small amount of the site, approximately 97 acres, contain soils with Storie Index Rating between 80 and 100, which indicates these soils have few or no limitations for agricultural production.

The project site is currently farmed by two organizations, Limoneira Company and Newsom Ranch. Approximately 405 acres of the 501-acre project site are currently under agricultural production. The Limoneira Company grows avocados and lemons on approximately 336 acres and limited row crops on an additional 9 acres. The Newsom Family Trust grows avocados and lemons on approximately 60 acres.

The California Department of Conservation developed the Land Evaluation and Site Assessment (LESA) Model as an optional method for use in assessing impacts to agriculture and farmland. This model considers site-specific information on soils, crop production, and other factors to determine the actual production capabilities of land currently used for agricultural purposes that would be converted to urban uses with the proposed project. The LESA Model considers the agricultural production capabilities of soils, the amount of agricultural land, water availability, the presence of surrounding agricultural lands, and surrounding protected resource lands to determine the significance of the impact of loss of farmland. Each of these factors is separately rated on a 100-point scale. The factors are grouped into two categories, the Land Evaluation (LE) and Site Assessment (SA) factors, then weighted relative to one another and combined, resulting in a single numeric score for a given project. The maximum attainable score is 100 points. The effect of a project on agriculture and farmland is considered significant if the score for a site is between 60 and 79 points, unless the sub score for either the LE or SA is less than 20. The total LESA score for the East Area 1 project site is 67 out of a possible 100 points. Since both the LE and SA subscores are greater than 20 points, the conversion of the farmland in the project site to non-agricultural uses is

considered a significant impact. The total score of 67 out of 100 primarily results from the size of the site and water resource availability. The relatively low score reflects the low land capability classifications of the soils on the site.

The City of Santa Paula follows *CEQA Guidelines*, 14 California Code of Regulations 15000 *et seq.* in identifying the conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, as mapped by the State Department of Conservation, to non-agricultural uses as a significant impact. Implementation of the proposed project would result in the conversion of approximately 352 acres of active farmland mapped as Prime Farmland or Unique Farmland to non-agricultural uses. The conversion of these 352 acres to non-agricultural uses, therefore, represents a significant impact to agricultural resources. Of this total, 152 acres of Prime Farmland and 200 acres of Unique Farmland would be converted to non-agricultural uses. The site contains no Farmland of Statewide Importance. The remaining 55 acres currently in production on the northern portion of the site would be located in a portion of the site designated as open space/agricultural preserve in the proposed East Area 1 Specific Plan and would remain in agricultural use.

In accordance with Ventura LAFCO policy, the site was evaluated in terms of prime agricultural land as defined by the California Government Code Section 56064. This section defines prime agricultural lands under several different criteria. Any irrigated land containing soils classified as Class I or Class II by the USDA Natural Resources Conservation Service (NRCS) and any land containing a Storie Index rating for soils of 80 through 100 is considered prime agricultural land. As discussed above, the project site includes approximately 156 acres of soil classified by the USDA as Class I and II soils, including the approximately 97 acres having a Storie Index rating of 80-100; approximately 154 acres would be impacted by the proposed project.

Government Code Section 56064 also defines prime agricultural land as 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 period on an annual basis not less than $400 per acre. The project site contains 339 acres of land that has returned $400 on an annual basis that meets this criterion in the Government Code for prime agricultural land. This total includes 126 of the 156 acres of the site containing Class I and II soils and/or having a Storie Index rating of 80 to 100.

In total, the site contains 369 acres that either has returned over $400 an annual basis and/or contains Class I/II soils or soils and/or has a Storie Index rating of 80 to 100, meeting the definition of prime agricultural land as defined in Government Code Section 56064. Of this total, approximately 314 acres would be permitted to convert to non-agricultural uses under the proposed Specific Plan.

The greatest impact to agricultural resources results from application of the City's criteria for determining agricultural resources impacts. Under the City's criteria for determining agricultural resources impacts, the conversion of the 352 acres of the site identified as Prime and Unique Farmland, and actively being farmed, from agricultural to non-agricultural uses under the proposed Specific Plan represents a significant agricultural resources impact. Under the criteria used by the Ventura County LAFCO, the conversion of 314 acres of farmland meeting the definition of prime agricultural land contained in the Government Code and used by LAFCO represents a significant agricultural resources impact.

The City of Santa Paula General Plan includes a policy requiring that applicants for development of land in agricultural production located within an existing greenbelt to provide easements or other agricultural land to compensate for the loss of agricultural land or provide funds to the Ventura County Agricultural Land Trust for the purchase of agricultural lands and/or easements within the Santa Paula Area of Interest. The State Department of Conservation Division of Land Resource Protection also recommends the consideration of the purchase of agricultural conservation easements on land of equal quality or size to compensate for the direct impact of the loss of agricultural land. Consistent with the City's General Plan policy and the recommendation of the State Department of Conservation, the following program has been developed to mitigate for the direct impacts of the project on agricultural resources.

As supported by the analysis in this study, the project will not result in any significant indirect impacts to other agricultural lands near the site or to the economic integrity of the agricultural industry in Ventura County.

The following measures are proposed to mitigate the significant direct impact of the loss of 352 acres of Prime and Unique Farmland by the project as proposed on agricultural resources to a less than significant level.

- A conservation covenant will be recorded by the applicant on the 55 acres of land currently in avocado production in the proposed agricultural preserve located along the northern portion of the East Area 1 site that restricts activities to agricultural operations. This will represent mitigation for 55 acres of agricultural land to be converted on the East Area 1 Specific Plan project site. This covenant will also require use of modified farming cultural practices, such as the restriction of the use of agricultural chemicals and practices that would generate high levels of dust, noise and odors, to ensure the compatibility of this agricultural use with the residential uses the Specific Plan would permit immediately south of this area.

- To mitigate the impact on the remaining 297 acres of active agricultural land to be converted on the East Area 1 Specific Plan site, the applicant will record an agricultural conservation covenant on 34 acres of other agricultural land owned by the applicant and currently under agricultural production within the City of Santa Paula's Area of Interest. The 34-acre mitigation site is located within a group of parcels south of Hwy. 126 and southwest of the City. This land is currently used for the production of strawberries, and is suitable for use to grow a wide variety of row crops. This

agricultural land has a higher agricultural productivity than the 297 acres impacted by the project. This 34-are mitigation site produces agricultural products equal in economic value to those produced on the 297 acres to be converted to non-agricultural use. The net annual production revenue for the mitigation site is more than $9,000 per acre and the total net production revenue was more than $306,000 for the period from 2003 to 2007. The 297 acres of the site to be converted to non-agricultural use has averaged net revenue over the past five years of approximately $305,910 (at a net return of $1,030 per acre). Recordation of an agricultural conservation covenant on the mitigation site will, therefore, result in the preservation of agricultural land in the City's Area of Interest of equal quality and economic value.

With the implementation of these mitigation measures, the direct impact of the project on agricultural resources will be mitigated to a less than significant level.

1.0 INTRODUCTION

This agricultural resources study presents information on the existing agricultural production and capability of the East Area 1 Specific Plan area, located immediately east of the City of Santa Paula, California. The site is located within the planning area of the City of Santa Paula, as defined in the City's General Plan, and is identified as an urban expansion area in the General Plan. The proposed East Area 1 Specific Plan would permit the development of educational, residential, commercial, and open space/park uses within the approximate 501-acre Specific Plan area. Of the 501 acres included in the proposed East Area 1 Specific Plan area, approximately 134 acres located on the northern edge of the site would be designated as open space and agricultural preserve in the Specific Plan with the existing in agricultural production continuing and the remaining approximate 367 acres would be developed.

The study provides information on the agricultural characteristics of the project site, the impacts associated with the conversion of agricultural land to non-agricultural use, and mitigation measures to avoid or lessen the significance of potential impacts. In addition to addressing the direct impacts of this proposed project, this study also addresses potential indirect impacts associated with permitting urban uses near existing agricultural uses located around this site.

2.0 PROJECT DESCRIPTION

2.1 Project Location

The East Area 1 Specific Plan area is located in Ventura County, California, and is situated at the eastern edge of the City of Santa Paula (**Figure 1, Regional and Project Site Location**). The City of Santa Paula is generally located directly north of Highway 126, west of the City of Fillmore, and east of the City of San Buenaventura. Specifically, the property is located within Section 2, Township 3 North, and Range 21 West of the U.S. Geological Survey Santa Paula 7.5-Minute Topographic Quadrangle.

The property is bounded by hillside agricultural land to the north; Haun Creek to the east; Main Street, the Fillmore & Western Railroad, and properties with frontage on Telegraph Road to the south; and Santa Paula Creek to the west. The property ranges in elevation from approximately 300 to 600 feet above mean sea level (msl) and slopes from the north to the south.

The Specific Plan area is comprised of four contiguous parcels; the Assessor Parcel Numbers are:

- 040-0-180-435 (25.18 acres);
- 040-0-180-565 (409.27 acres);
- 107-0-200-115 (63.72 acres); and

- 107-0-045-015 (3.00 acres).

2.2 Project Description

The proposed Specific Plan would permit the development of the site as a master-planned community containing a mix of civic, educational, park and open space, residential, commercial, and light industrial uses. The Specific Plan would permit development on the flatter central and southern portions of the site, while the steeper hillsides in the northern portion of the site would remain undeveloped and continue to be used for agricultural purposes. The proposed regulatory plan from the proposed Specific Plan is provided in **Figure 2, East Area 1 Land Use Plan**. The type and maximum intensity of the land uses that would be permitted by the East Area 1 Specific Plan as proposed is shown in **Table 1, Proposed East Area 1 Specific Plan Land Use Summary.**

The Specific Plan area is approximately 501 acres in size and has historically been used for agricultural purposes. Currently, the site primarily contains citrus and avocado orchards, with a small portion used for row crops. The Specific Plan area also contains some farm structures, including some residences for farm workers, and a packing house building, which is currently used for other purposes. The very northern portion of the site also contains some small areas of native vegetation (approximately 50 acres) in areas not planted with avocado trees.[1]

Of the 501 acres included in the proposed East Area 1 Specific Plan area, approximately 134 acres located on the northern edge of the site would be maintained as open space and agricultural preserve with agricultural production continuing on this portion of the site. The remaining approximately 367 acres would be developed with the proposed residential neighborhoods, commercial districts, institutional uses, parks, and supporting facilities.

The proposed East Area 1 Specific Plan would preserve open space adjacent to current open space and agricultural areas located to the north and east of the proposed Specific Plan area. This design is intended to ensure the compatibility of this new set of neighborhoods in the City of Santa Paula with neighboring agricultural land. The East Area 1 Specific Plan incorporates a number of design features intended to address the interface between active agriculture areas and the new urban uses that would be permitted by the proposed Specific Plan.

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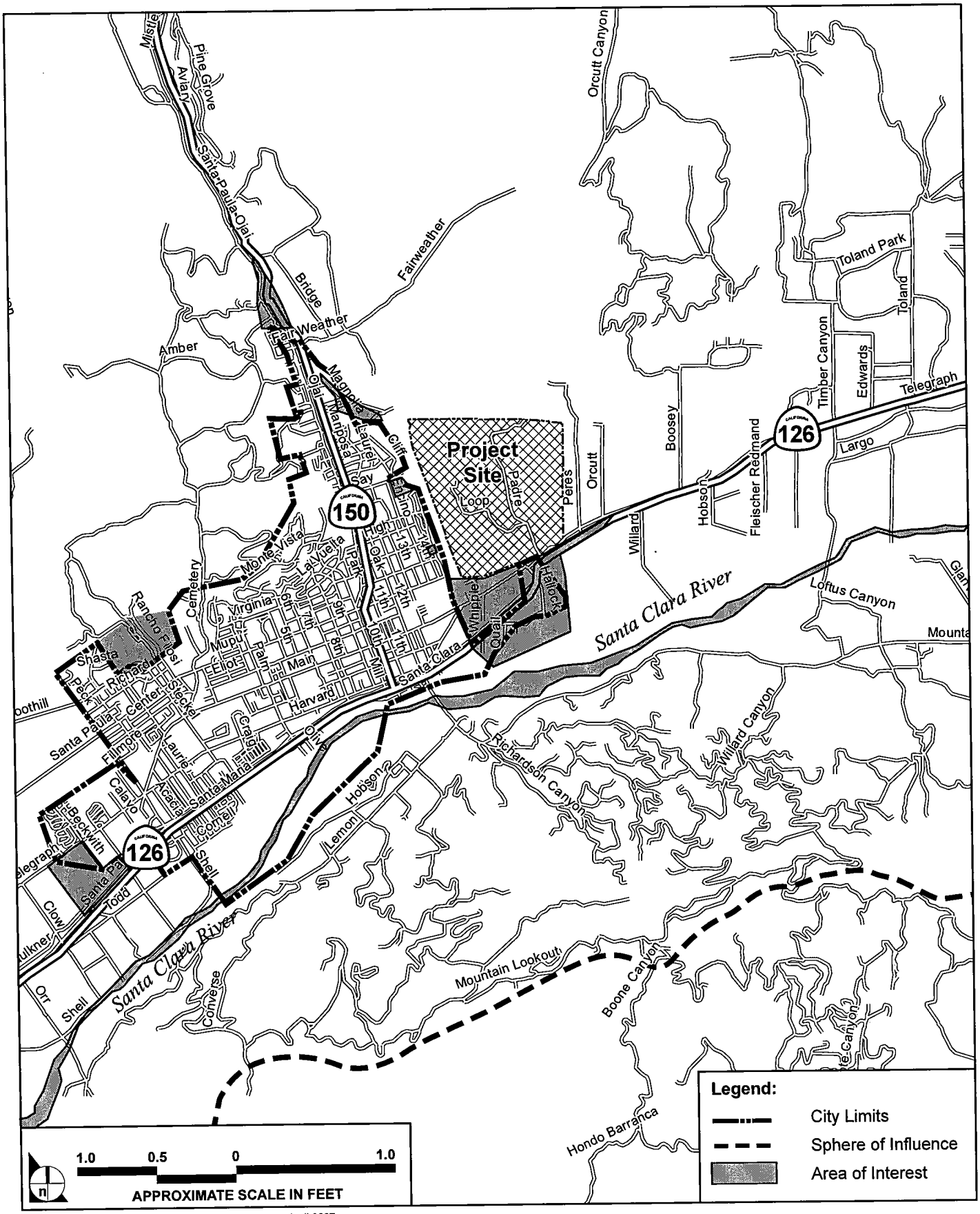
1 Impact Sciences, Inc., Biological Resources Study for the East Area 1 Specific Plan Area, Santa Paula, California, June 2007.

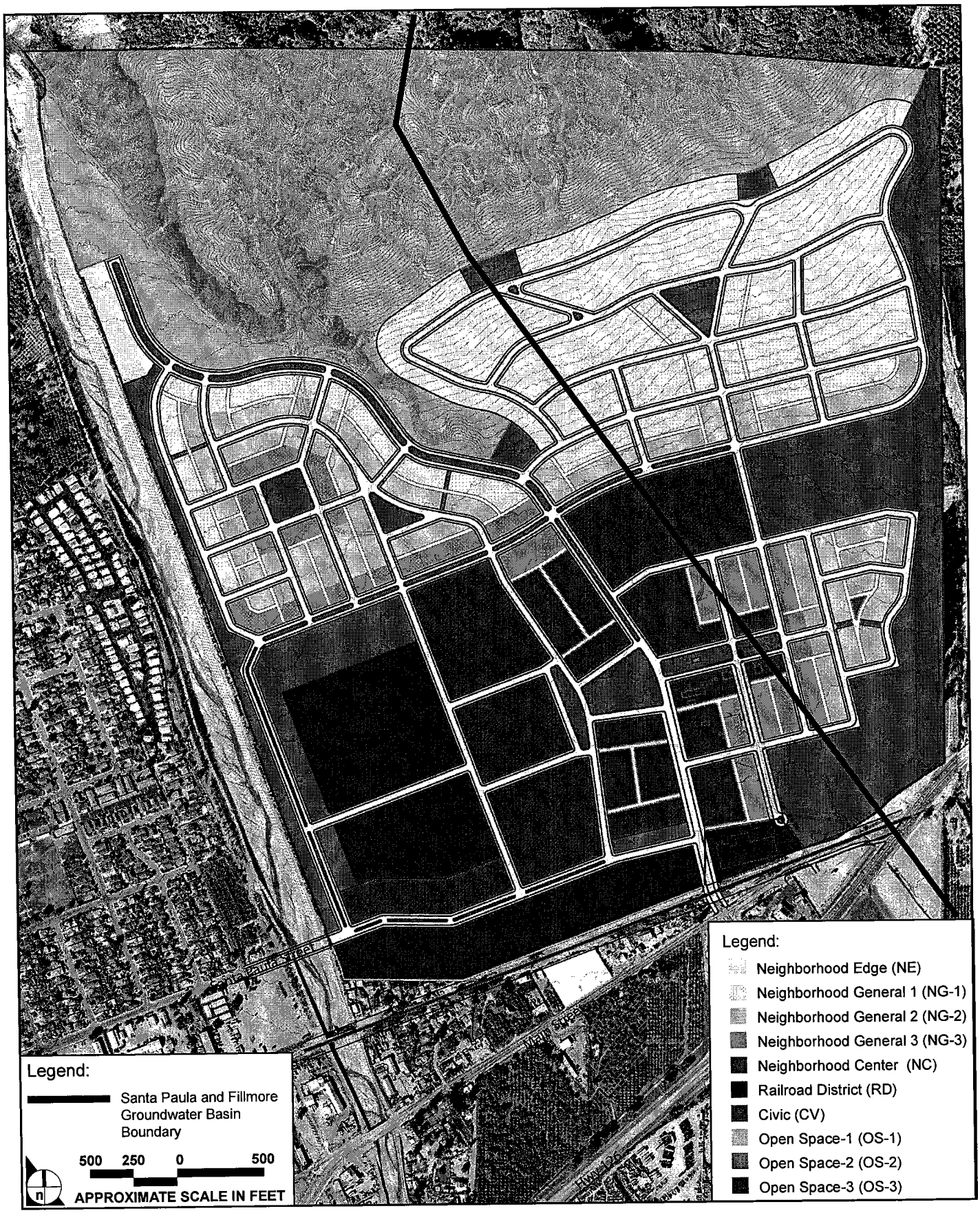


SOURCE: AirPhoto USA – 2005, Impact Sciences, Inc. – April 2007

FIGURE 1

Regional and Project Site Location

831-001•05/07



SOURCE: United Water Conservation District – 2004

FIGURE **2**

East Area 1 Land Use Plan

831-001•07/07

Table 1
East Area 1 Specific Plan Proposed Land Use Summary

Planning Area	Land Use	Acreage	Light Industrial SF	Commercial SF	Civic/ Institutional SF	Dwelling Units
A	**Santa Paula Creek Neighborhood**					
	Residential	33.1				326
	Agricultural Preserve	14.3				
	Open Space: Park	5.1				
	Open Space – Roads, Medians	21.4				
	Subtotal	73.9				**326**
B	**Foothill Neighborhood**					
	Residential	66.4				359
	Open Space	79.4				
	Agricultural Preserve	40.7				
	Open Space -Parks, Greenways	11.4				
	Open Space- Roads, Medians	26.0				
	Subtotal	**223.9**				**359**
C	**Santa Paula Creek Civic District**					
	Civic: School	8.3			110,400	
	Civic: Shared Facilities	5.6			65,000	
	Civic: Community College	11.6			165,000	
	Open Space: Shared Athletic Fields	23.2				
	Open Space: Parks, Greenways	12.0				
	Open Space: Roads, Medians	13.1				
	Subtotal	**73.8**			**340,400**	
D	**Haun Creek Neighborhood**					
	Residential	28.0				745
	Commercial: Assisted Living	3.0		75,000		
	Commercial: Office/Retail	10.0		150,000		
	Civic: School	10.8			35,400	
	Open Space: Parks/Greenways	37.3				
	Open Space: Roads/Medians	21.0				
	Subtotal	**110.1**		**225,000**	**35,400**	**745**
E	**East Santa Paula Railroad District**					
	Work/Live	7.3				70
	Work: Light Industrial/Employment	7.3	150,000			
	Commercial: Office/Retail	2.4		60,000		
	Open Space – Roads, Medians	2.4				
	Subtotal	**19.4**	**150,000**	**60,000**		**70**
Total for East Area 1 Specific Plan Area		**501.1**	**150,000**	**285,000**	**375,800**	**1500**

Source: HDR Town Planning, East Area 1 Specific Plan, October 2007.

The East Area 1 Specific Plan incorporates features to protect the public health, safety, and welfare of residents and protect the economic viability and long-term sustainability of the agricultural industry in Ventura County. Through the East Area 1 Specific Plan design, exposure of the public to agricultural chemicals, dust, noise, and odors can be minimized. Additionally, agricultural operation and land can be protected from vandalism, trespassing, and complaints against standard legal agricultural practices.

The East Area 1 Specific Plan provides for a permanent buffer of open space between the proposed residential uses and existing agricultural operations to the north and east of the site. The approximate locations of these buffer areas are illustrated in **Figure 3, East Area 1 Agricultural Buffers.**

Along the northern portion of the site, an agricultural preserve will be established to protect ongoing farming activities. These have historically included avocado orchards in the foothill areas of the site. To ensure the ability of the avocado orchards to continue to be farmed, a 300-foot set-back from the proposed adjacent residential property lines and streets will be established. This preserve will utilize modified farming cultural practices via a legally enforceable covenant that will adequately mitigate impacts between the farmland and adjacent non-farming land uses such as the restriction of the use agricultural chemicals and practices that would generate high levels of dust, noise, and odors.

Along the eastern side of the property, near the Haun Creek drainage, the East Area 1 Specific Plan proposes open space that would be utilized as greenways and passive recreation. Development would be limited to trails and walkways. These areas would range from a minimum of 150 feet to over 300 feet in width from the existing agricultural uses to the east and the lot lines of new residences proposed in the Specific Plan area. In areas that are less than 300 feet wide, a vegetative screen consisting of at least two staggered tree rows and shrubs characterized by evergreen foliage extending from the base of the plants to the crowns will be incorporated into the landscaped design. The trees to be used in the landscape design will be vigorous, drought tolerant, and have a mature height of 15 feet or more; the actual species to be used will be detailed in the landscape plan for the East Area 1 Specific Plan. These areas will be continuously maintained.

SOURCE: HDR Town Planning - May 2007, Impact Sciences, Inc. - 2007

FIGURE **3**

East Area 1 Agricultural Buffers

3.0 REGULATORY FRAMEWORK

3.1 Overview

The project site is currently within the unincorporated area of Ventura County and is designated as Agricultural, Agricultural – Urban Reserve, Open Space, and Urban in the County of Ventura General Plan.[2] The zoning designations for the site are Agriculture Exclusive and Limited Industrial. The site is also located within the Area of Interest of the City of Santa Paula, as defined by the Ventura LAFCO, and the planning area of the City of Santa Paula, as defined in the City's General Plan. The site is identified as an expansion area for the City in the Santa Paula General Plan.[3] The City's General Plan requires that a Specific Plan, in addition to other provisions, be prepared before annexation of the site can be considered by the City. The Santa Paula General Plan currently envisions development of the site with up to 900 residential units, a school site, a hotel and golf course, and a park and recreation areas on approximately 541 acres. The proposed East Area 1 Specific Plan would permit the development of educational, residential, commercial, light industrial and open space/park uses within the approximately 501-acre Specific Plan area.

The entitlement process for the Specific Plan property involves consideration of adoption of the Specific Plan and the approval of related discretionary actions by the City, followed by a citywide election to consider an amendment to the City's Urban Restriction Boundary, as defined in the General Plan, to include the Specific Plan area. Subsequent to these City approvals, the Ventura LAFCO would consider an amendment to the current Sphere of Influence for the City to include the Specific Plan area and annexation of the site to the City of Santa Paula. After annexation to the City, the East Area 1 property would have a Specific Plan designation on the City's General Plan land use map, and land uses on the site would be regulated by the East Area 1 Specific Plan.

3.2 Farmland Designations

The California Department of Conservation Division of Land Resource Protection Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is categorized according to soil quality and irrigation status. The maps are updated every two years through the review of aerial photographs, a computer mapping system, public review, and field reconnaissance. The latest available data on a statewide basis is for the period 2000 to 2002. The 2002 to 2004 report will be available sometime in late

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2 County of Ventura General Plan, Land Use Map.

3 City of Santa Paula, General Plan, 1998, p. LU-19.

spring 2007. The most recent map for Ventura County is for the period 2002 to 2004; at this time, updated farmland maps for the 2004 to 2006 period have only been completed for Alameda and Solano counties.[4]

The Department of Conservation utilizes the following categories to designate farmland:

- Prime Farmland has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- Unique Farmland consists of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

- Farmland of Local Importance is land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. Ventura County defines Farmland of Local Importance as Soils that are listed as Prime or Statewide that are not irrigated, and soils growing dryland crops such as beans, grain, dryland walnuts, or dryland apricots.

- Grazing Land is land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit is 40 acres.

- Urban and Built-up Land is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.

- Other Land is land not included in any other mapping category. 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 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

3.3 City of Santa Paula

The City's General Plan identifies the project site as the East Area 1 Expansion Area.[5] The General Plan includes implementation measures to guide the development of East Area 1. Several of these measures,

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4 The 2002–2004 Land Use Conversion was the most current data at time of publication according to Karen Fitzgerald from the California Department of Conservation, March 27, 2007.

(General Plan Implementation Measures Nos. 40, 68, and 69) are intended to promote compatibility between the urban uses that would be established on the site under the General Plan and the agricultural uses east and north of the site.[6] These measures state the following (annotated to address only items related to agriculture):

No. 40: The following Development Standards for the East Area 1 (Teague/McKevett property) expansion area shall be implemented through a Specific Plan(s) and subsequent development approvals:

- Buffers the creek area and hillsides as viewed from the city;
- Require a park strip or open space area along the creek and the eastern property boundary with a hiking trail; and
- Clustering is required to protect open space, agriculture, and habitat.

No. 68: Review all development proposals adjacent to agriculture for impacts on agricultural land and crops.

No. 69: Require proposed development adjacent to agricultural uses to provide a buffer (setback, landscaping, recreational uses, street, etc.)

The implementation measures of the City's General Plan Conservation and Open Space Element also provided to address agricultural lands and resources within the City's Planning Area.[7] These include:

No. 13: Review all development proposals adjacent to agricultural land and crops

No. 14: Require all proposed development adjacent to agricultural uses to provide a buffer (setback, landscaping, recreational uses, street, etc.)

No. 15: Require any new development on designated agricultural lands or designated prime agricultural soils to provide information on the viability of the agricultural soils and operations prior to requesting approval for urban uses

No. 19 Applicants for development of land in agricultural production that is within an existing greenbelt shall provide funds to the Ventura County Agricultural Land Trust for the purchase of agricultural lands and/or easements within the Santa Paula Area of Interest.

The Santa Paula General Plan Update EIR states that the General Plan would convert about 1,500 acres of land (including East Area 1) currently under intensive cultivation (row crops, orchard crops, and

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5 City of Santa Paula, *General Plan*, Final, adopted April 13, 1998 as amended through June 16, 2003.

6 Ibid, VI. Land Use Plan – Implementation Measures, pp. LU-64 and LU-67.

7 City of Santa Paula, *General Plan, Open Conservation and Open Space Element, IV. Implementation Measures*, Final, adopted April 13, 1998 as amended through June 16, 2003, pp. CO-55 and 56.

greenhouses) to urban uses. The General Plan Update EIR finds that this "Conversion of cultivated farmland is considered a Class II, *significant but mitigable* impact"[8]

The General Plan Update EIR notes that most of the area being considered for expansion by the City is either in agricultural production, or is grazing land. It further states that much of the acreage contains high value crops, including lemons, avocados, and oranges. The Final EIR for the General Plan Update assumed that all land supporting crop production within the expansion areas could be impacted, and that productive farmland under intensive cultivation could be converted to urban uses. The Final EIR for the General Plan Update notes that nearly all of the expansion areas on the valley floor currently support high value cropland, most of which could be converted into urban uses.

The Final EIR for the General Plan Update provides the following mitigation measures to "address potential impacts to intensively cultivated agriculture" that are applicable to the East Area 1 project and have been incorporated into the proposed project design. These measures would "further reduce impacts to a less than significant impact"[9]

AG-2(a) Purchase of Agricultural Conservation Easements (PACE) Program. The City shall implement a program, referred to as the Purchase of Agricultural Easements (PACE) program, that facilitates the establishment and purchase of Agricultural Conservation Easements (ACE) within the expansion areas and, if the County is amenable, on lands outside the expansion areas within the County's jurisdiction. The program would apply to development on lands currently within greenbelts areas while easements may be purchased on lands within the expansion areas and/or lands outside the expansion areas under the County's jurisdiction.

Consistent with this mitigation measure, the applicant has proposed to provide agricultural conservation easement (in the form of restrictive covenants) on other lands within the City's Area of Interest that could be added to the Santa Paula-Ventura Greenbelt.

AG-1(b) Urban Growth Boundary (UGB). The City shall adopt the Urban Growth Boundary concept in it General Plan as a long-term conservation strategy....Validation of a UGB can come through the ballot box and/or by binding joint powers agreements between jurisdictions.

The City has implemented this measure and adopted an Urban Growth Boundary.

The Final EIR for the General Plan Update concludes that implementation of these mitigation measures would reduce potential impacts from loss of "other" cultivated lands not identified as State Important Farmlands to a less than significant level.

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8 City of Santa Paula, Final Environmental Impact Report, General Plan Update, February 1998, p. F-4.1-12.

9 City of Santa Paula, *Final Environmental Impact Report, General Plan Update*, February 1998, F-4.1-14.

The Final EIR for the General Plan Update notes that the use of these measures "assumes that measures result in the preservation and conservation of a like amount of agricultural land area to that being converted to urban uses. Land used to replace converted acreage should be substantially equal in agricultural quality to the area converted to urban uses."

Santa Paula is a partner in the Fillmore-Santa Paula Greenbelt Agreement, adopted by resolution of the City of Santa Paula, the City of Fillmore, and the County, that affect lands that are contiguous to the City on the east as illustrated in the City of Santa Paula General Plan Update Final Environmental Impact Report[10]: This agreement was approved in 1980 and covers approximately 34,200 acres. Santa Paula Creek is the western boundary, the Los Padres National Forest is the northern boundary, Sespe Creek is the eastern boundary, and the South Mountain ridgeline and Oak Ridge are the southern boundary.

The greenbelt was adopted by resolution by the participating cities and County. The City of Santa Paula General Plan states, "The City intends to amend the agreement to remove 567 acres that are part of expansion areas East Area 1 and East Area 2."[11]

The Final EIR for the City General Plan Update states "Expansion into East Area 1 and East Area 2 would require modification of the City's existing greenbelt agreement with the neighboring City of Fillmore. Greenbelt impacts are considered Class II, *significant but mitigable.*"[12]

The Final EIR for the General Plan Update notes that expansion into East Area 1 and 2 would urbanize about 565 acres currently within the Santa Paula and Fillmore Greenbelt Agreement and notes that this would be a significant impact. The Final EIR for the General Plan Update also notes that the City intends to amend the agreement to remove this area from the greenbelt. Policies in the General Plan call for the initiation of an agricultural land or easement purchase program that would be funded by fees collected from development within existing greenbelt areas. The Final EIR for the General Plan Update also states that alternative measures that provide equal or improved mitigation, such as agricultural lands added to the greenbelts, can be considered.

The Final EIR for the General Plan Update notes policies and implementation measures in the General Plan to address potential impacts to greenbelts. Specifically for the East Area 1 project, the following are listed in the Final EIR for the General Plan Update:

Policy 4.0.0. (Land Use Element) Add new lands into the greenbelt to compensate for lands that may be removed from the greenbelt for Sphere of Influence amendments. (IM 31)

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10 Ibid, Figure 4.1-1.

11 City of Santa Paula, *General Plan, Land Use Element*, Final, adopted April 13, 1998, p. LU-25.

12 City of Santa Paula, Final Environmental Impact Report, General Plan Update, February 1998, p. F-4.1-15.

IM 31 Adopt new formal greenbelt for the Santa Clara River Valley to the east of town.

The Final EIR for the General Plan Update states that these policies and implementation measures would address potential greenbelt impacts, but would not by themselves reduce potential impacts to a less than significant level. The Final EIR for the General Plan Update provides the following mitigation measures:

AG-3(a) Amend Greenbelt Agreement with Fillmore. The City shall initiate a formal amendment process for its greenbelt agreement with the City of Fillmore. For each acre removed from the existing greenbelt as a result of development in East Area 1 and 2, 1 acre shall be added to the greenbelt in other appropriate locations within the City's Area of Interest. One such location might be in the vicinity of Rancho La Cuesta, near Highway 150.

The City will need to initiate a formal amendment to the greenbelt, consistent with this mitigation measure from the General Plan EIR. Comments on the General Plan EIR from multiple public agencies in the County questioned the feasibility of adding other land to the Greenbelt in the Rancho La Cuesta Area. Consistent with this mitigation measure, the applicant has proposed to provide agricultural conservation easement (in the form of restrictive covenants) on other lands within the City's Area of Interest that could be added to the Santa Paula-Ventura Greenbelt.

AG-1(b) Urban Growth Boundary (UGB). The City shall adopt the Urban Growth Boundary concept in it General Plan as a long-term conservation strategy....Validation of a UGB can come through the ballot box and/or by binding joint powers agreements between jurisdictions.

The City has implemented this measure and adopted an Urban Growth Boundary.

AG-2(a) Purchase of Agricultural Conservation Easements (PACE) Program. The City shall implement a program, referred to as the Purchase of Agricultural Easements (PACE) program, that facilitates the establishment and purchase of Agricultural Conservation Easements (ACE) within the expansion areas and, if the County is amenable, on lands outside the expansion areas within the County's jurisdiction. The program would apply to development on lands currently within greenbelts areas while easements may be purchased on lands within the expansion areas and/or lands outside the expansion areas under the County's jurisdiction.

The Final EIR for the General Plan finds that use of the above policies and implementation measures in conjunction with recommended mitigation measures would reduce impacts to a less than significant level.

The Final EIR for the General Plan Update states that "Development under the proposed General Plan may result in land use conflicts between proposed urban uses and existing agricultural operations. This is considered a Class II, *significant but mitigable* impact."[13]

The Final EIR for the General Plan Update notes that as development occurs within the expansion areas, there will likely be potential conflicts between existing agricultural operations and new non-agricultural (mostly residential) uses. The Final EIR for the General Plan Update also notes that "detrimental effects could occur to both the residential and agricultural uses."

The Final EIR for the General Plan Update notes the following potential impacts:

Impacts to Residential Uses. Residents living adjacent to farmland commonly cite odor nuisance impacts, noise from farm equipment, vehicle conflicts, dust and pesticide spraying as typical land use conflicts. Conflicts between farm vehicles and high-speed automobiles used by residents on adjacent roadways can lead to accidents. Pesticide spraying can result in health hazards, while odor and noise are nuisances that can effect the enjoyment of private dwellings. Increased dust from soils and farm equipment can be both a nuisance and health hazard. Such impacts are considered potentially significant.

Impacts to Agricultural Uses. Urban development adjacent to farmland can have several negative impacts on continued farm operations. Direct physical impacts include vandalism to farm equipment or fencing, and theft of fruits and vegetables. Soil compaction from trespassers or equestrians can also damage crop potential. These can result in indirect economic impacts. Decreased air quality from adjacent urban development can also result in impacts to adjacent farmlands.

Other indirect impacts to agriculture from nearby urban uses can affect the long-term viability of such operations. Increased regulations and liability insurance to protect the farmer from adjacent urban uses cost time and money. Some farmers sensitive to nearby residences voluntarily limit their hours of operations and not intensively uses the portions of their property closest to urban uses, in effect establishing informal buffer zones on their own property. This has the effect of lowering crop yield, and therefore the long-term economic viability, of the agricultural operation.

The Final EIR for the General Plan Update notes the policies and implementation measures to address potential impacts related to residential/agricultural land use conflicts:

Policy 3.b.b. (Conservation/Open Space Element) Erosion of soils should be controlled and prevented during agricultural use, during storms and especially during the construction phase of new development. (IM 13, 14).

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13 City of Santa Paula, Final Environmental Impact Report, General Plan Update, February 1998, p. F-4.1-17.

Policy 5.a.a. (Noise Element) Work with the agricultural industry to address conflicts on a case-by-case basis and develop noise mitigation as practicable. (IM 17)

IM13 (Conservation/OS Element) Review all development proposal adjacent to agricultural for impacts on agricultural land and crops.

IM 14 (Conservation/OS Element) Require all proposed development adjacent to agricultural uses to provide a buffer (setback, landscaping, recreational uses, street, etc.).

IM 17 (Noise Element) Work with farmers in and around the City to address any identified noise problems related to the use of farm equipment such as frost protection equipment and farm machinery routes on City streets through implementation of a Right-to-Farm ordinance.

The Final EIR for the General Plan Update indicates that these policies and implementation measures would reduce potential impacts to agricultural land use conflicts, but would not by themselves reduce potential impacts to a less than significant level. The Final EIR for the General Plan Update provides the following mitigation measure:

AG-4(a) Right-to-Farm Ordinance. The City shall adopt a Right-to-Farm Ordinance which would include specific requirements to preserve existing and encourage new agricultural land use and would require disclosure to potential land buyers that agricultural operations are protected from nuisance lawsuits. It should be modeled after the ordinance recently approved by the County. The City should also support the County's ordinance, which applies to unincorporated areas (which currently includes the City's expansion areas). The ordinance would require all new development to be informed about the nature of commercial agricultural operations near the City. Moreover, it would call for a buffer between agriculture and new development, the size of which would be determined on a case-by-case basis. The buffer area would be included on the land slated for new development. Finally, the ordinance should include provisions to resolve disputes between landowners.

The Final EIR for the General Plan Update found that the use of the above policies and implementation measures in conjunction with the recommended mitigation measure would reduce land use impacts to agricultural operations to a less than significant level.[14]

3.4 Ventura County Local Agency Formation Commission (LAFCO)

The LAFCO in each county in the state was formed and operates under the provisions of state law, specifically what is now known as the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code Section 56000 et seq.). State law provides for LAFCOs to be formed as independent agencies in each county in California. LAFCOs implement state law requirements and state and local policies relating to boundary changes for cities and most special districts, including spheres of

14 City of Santa Paula, Final Environmental Impact Report, General Plan Update, February 1998, p. F-4.1-18.

influence, incorporations, annexations, reorganizations, and other changes of organization. In this capacity, the Ventura LAFCO is the boundary agency for cities and most special districts in Ventura County.

All LAFCOs have the following general objectives and authorities:

Objectives:

- Encourage the orderly formation and expansion of local government agencies.
- Preserve agricultural land resources.
- Discourage urban sprawl.

Authorities:

- Regulate boundary changes.
- Establish spheres of influence – the probable physical boundaries and service area of a city or special district.
- Conduct reviews of public services and special studies.
- Initiate special district consolidations or dissolutions.
- Act on out-of-agency service agreements between public agencies and between public agencies and private parties.

The Cortese-Knox-Hertzberg Local Government Reorganization Act requires that each LAFCO adopt written policies and procedures. In addition, other provisions of state law require that LAFCOs adopt written policies and guidelines applicable to specialized functions (e.g., CEQA). The Ventura County Commissioner's Handbook is a compilation of all written policies and procedures adopted by the Ventura LAFCO.

On February 21, 2007, the Ventura County LAFCO adopted a new policy addressing the types of information local agencies need to submit with an application for any action that could be expected to lead to the conversion of agricultural lands. This policy added the following to Policy 2.1.2.1 in the Ventura LAFCO Commissioner's Handbook:[15]

> *Unless specifically waived by the LAFCO Executive Officer, for any proposal which could reasonably be expected to lead to the conversion of agricultural lands (as defined by Government*

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15 Ventura Local Agency Formation Commission, Meeting Minutes, February 21, 2207, available at: http://gsa-docushare.countyofventura.org/dscgi/ds.py/Get/File-17312/SD06.pdf.

Code Section 56016) to non-agricultural uses, information regarding the effect of the proposal on maintaining the physical and economic integrity of agricultural lands shall be submitted in conjunction with the application. Specifically, the information should address the following:

i. The location of, and acreage totals for, prime and non-prime agricultural land involved in the area and adjacent areas. This analysis shall be based on the definition of "prime" agricultural land pursuant to Government Code Section 56064.

ii. The effects on agricultural lands within the proposal area

iii. The effects on adjacent agricultural lands

iv. The effects on the economic integrity of the agricultural industry in Ventura County

In addition, information should be provided about any measures adopted to reduce the effects identified.

As referenced above, the California Government Code (Section 56064) defines "Prime agricultural land" as:

"Prime agricultural land" means 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.

3.5 Ventura County

The project site is currently located in the unincorporated portion of Ventura County. The County General Plan identified 1,500 acres of agricultural land in the Santa Paula Growth Area and 6,617 acres of agricultural land in the Santa Paula non-growth area in 1990.[16] To preserve the agricultural base of the County, the General Plan discourages the conversion of farmland to other uses.

The County, as detailed in the General Plan, has adopted various programs designed to support and preserve agriculture. Agricultural preservation has been integrated into the County's overall land use planning strategy and is a reciprocal beneficiary of many interagency regional land use planning and resource conservation programs. The principal interagency programs include the "Guidelines for Orderly Development," several existing Greenbelt Agreements between cities and the County, and the various regional water programs. Specific County agricultural preservation programs are:

- Agriculture Land Use Designation – The land use chapter (of the General Plan) establishes an Agriculture designation for lands identified in the Important Farmlands Inventory (with some exceptions, see land use chapter). This designation establishes a 40-acre minimum parcel size and subjects all parcels to be rezoned Agricultural Exclusive (A-E).

- Land Conservation Act Program – In 1966, the state adopted enabling legislation to enhance the preservation of agricultural lands. Known as the Land Conservation Act (LCA) or Williamson Act, the law allows farmers to enter into a long-term contract (minimum of 10 years) to keep their land in exclusive agricultural use in exchange for a reduced tax assessment based on the agricultural value of the property. Ventura County entered the program in 1969.

The Ventura County Board of Supervisors also adopted a "Right to Farm Ordinance" intended to protect the farming community from developments that would inhibit their ability to continue agricultural production.[17] Such things as agricultural wind machines, odors, dust, and noise, are the subjects of nuisance complaints by adjoining property owners. The "Right to Farm Ordinance" is intended to make a new purchaser of property aware that existing agricultural operations inherently have noise, odor, and other potentially annoying activities that are associated with accepted agricultural operations. The Right to Farm Ordinance is contained in the Ventura County Coastal and Non Coastal Zoning Ordinances (Sec. 8183-4.1 and Sec. 8114-2.1.1, respectively).

The County Agricultural Commissioner is responsible for enforcing local ordinances, state laws and regulations and federal laws and regulations governing the agricultural industry. The Ventura County

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16 Ventura County, General Plan, Land Use Appendix, Amended by the Ventura County Board of Supervisors on June 19, 2001, Figure 3.2.2 Residential Holding Capacity Table, p. 9.

17 Ventura County, Planning Division, Division 8, Chapter 1 of the Ventura County Ordinance Code, *Non-Coastal Zoning Ordinance*, amended July 29, 2003.

Agricultural Commissioner administers the following programs as an appointee of the Board of Supervisors:

- Pest Detection
- Pesticide Use Enforcement
- Pest Exclusion
- Land Use Planning
- Fruit, Nut and Vegetable Standardization
- Apiary Inspection
- Nursery Inspection
- Seed Inspection
- Crop Statistics

The Agricultural Commissioner conducts over 500 pesticide use inspections per year. California has the most stringent pesticide regulations in the nation. Licenses are required for businesses who apply pesticides for hire in agricultural, residential, or industrial/institutional settings and for persons who apply restricted materials to public property.

The Agricultural Commissioner oversees the Pest Detection Program, which is responsible for the early detection of various insect pests which are not presently established within the State of California or the County of Ventura but which are known to be a threat to agriculture, forest industries, and the environment. The program is currently administered by the California Department of Food and Agriculture.

3.6 Williamson Act and Farm Land Security Act

The California Land Conservation Act of 1965, also known as the Williamson Act, was established with the basic intent of encouraging the preservation of the state's agricultural lands in view of increasing trends toward their "premature and unnecessary" urbanization. The act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural and open-space uses. In return, landowners receive reduced property tax assessments. These reduced rates are much lower than normal as they are based upon farming and open space uses as opposed to full market value of the land. Local governments receive an annual subvention of forgone property tax revenues from the state via the Open Space Subvention Act of 1971.

The State Department of Conservation, under the Farm Land Security Act passed in 1998, allows individual counties to establish an additional program for farmlands to enter into contract with the sate to receive a benefit similar to Williamson Act contracts. The Farmland Security Act is a 20-year self-renewing contract that allows property owners with qualifying parcels to receive an additional 35 percent in tax savings above that which is received under the Williamson Act contract.

Both Williamson Act and Farm Land Security Act contracts require that lands be within an established agricultural preserve. An agricultural preserve defines the boundary of an area within which each city or county will enter into contracts with landowners. The boundary is designated by resolution of the local board of supervisors (board) or city council (council) having jurisdiction. An agricultural preserve must consist of no less than 100 acres. However, in order to meet this requirement, two or more parcels may be combined if they are contiguous or in common ownership. Smaller agricultural preserves may be established if a board or council determines that the characteristics of the agricultural enterprise in the area call for smaller agricultural units, and if the establishment of the preserve is consistent with the General Plan. Agricultural lands that are not in a preserve face the greatest threat for conservation, as they are assessed higher property taxes due to their proximity to urbanization.

None of the parcels in the East Area 1 Specific Plan area is under either Williamson Act or Farmland Security Act contracts.

4.0 AGRICULTURAL RESOURCES SETTING

The East Area 1 Specific Plan site is located east of the City of Santa Paula in Ventura County, California, an area that has an extensive history of agricultural activity. The site has been actively farmed since 1905. Agriculture continues to be a major industry in Ventura County with a total estimated gross production of $1,225,109,000 in 2005.[18]

This section discusses the overall status of agriculture in the state and County, and specific information on agricultural activities on the East Area 1 Specific Plan site.

4.1 State of California

As documented by the Farmland Mapping and Monitoring Program (FMMP) the state's urban land expanded by 92,750 acres (about 145 square miles) between 2000 and 2002.[19] The best agricultural lands, identified as Prime Farmland, had a net decrease of 47,172 acres (74 square miles) and were the source of

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18 Ventura County, Agricultural Commissioner, *Annual Crop Report – 2005*, July 5, 2006, p. ii.

19 California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program *California Farmland Conservation Report 2000-2002*, December 2004.

21 percent of statewide urbanization during the period. These summary statistics reflect the contributions of a series of demographic and agricultural trends that are discernable in County-level data. **(Table 2, California Agricultural Land Conversion Summary 2000–2002)**

4.1.1 Land Use Conversion

Farmland Conversion Reports are the primary summary documents associated with each map update prepared for the Farmland Mapping and Monitoring Program. Statewide, regional, and county land use conversion information covers two-year periods with the summary and analysis including comparisons to prior two-year periods. At the time this report for East Area 1 was prepared, the most recent published statewide report with data was for the 2000 to 2002 period as the 2002 to 2004 report is currently being prepared. The most recent available data for Ventura County is for the 2002 to 2004 period.[20]

For the first two years of the decade, California land was converted to urban uses at a pace of just 1.6 percent above that of the 1998–2000 period. Development on Prime Farmland accelerated by 13 percent. Irrigated farmland also lost ground due to land idling, low-density residential and ecological restoration uses. The trend toward vineyard development, which had offset farmland loss in recent updates, slowed in the 2000 to 2002 period, resulting in a net loss of irrigated land 28 percent larger than in 1998 through 2000.

Statewide, 21 percent of new urban land between 2000 and 2002 had been Prime Farmland, and an additional 8 percent came from other irrigated categories. Urbanization on Prime Farmland increased by 13 percent compared with the 1998 to 2000 update cycle. The continued shift of urban pressure into the central valley affected this change, even as overall urbanization remained nearly identical to the prior two-year cycle.

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20 Individual data for counties is available in advance of the published statewide report, personal communication with Karen Fitzgerald from the California Department of Conservation, March 27, 2007.

Table 2
California Agricultural Land Conversion 2000–2002

PART I
Summary and Change by Land Use Category

Land Use Category	Total Acreage Inventoried		2002–2004 Acreage Changes			
	2000	2002	Acres Lost (-)	Acres Gained (+)	Total Acreage Changed	Net Acreage Changed
Prime Farmland	5,228,884	5,181,712	114,619	67,448	182,067	-47,172
Farmland of Statewide Importance	2,736,814	2,718,533	59,121	40,840	99,961	-18,281
Unique Farmland	1,253,663	1,266,779	57,080	70,196	127,276	13,116
Irrigated Farmland	544,593	542,987	7,092	5,467	12,559	-1,626
Non-irrigated Farmland	11,244	9,564	1,744	64	1,808	-1,680
Farmland of Local Importance	3,050,694	2,991,655	157,441	98,402	255,843	-59,039
IMPORTANT FARMLAND SUBTOTAL	12,825,892	12,711,210	397,097	282,417	679,514	-114,682
Grazing Land	15,466,541	15,407,663	172,857	113,980	286,837	-58,878
AGRICULTURAL LAND SUBTOTAL	28,292,433	28,118,873	569,954	396,397	966,351	-173,560
Urban and Built-up Land	3,185,252	3,278,002	90,089	182,838	272,927	92,750
Other Land	13,668,231	13,749,040	168,401	249,209	417,610	80,809
Water Area	704,432	704,433	1	2	3	1
TOTAL AREA INVENTORIED	**45,850,348**	**45,850,348**	**828,445**	**828,446**	**1,656,891**	**0**

PART II
Land Committed to Nonagricultural Use

Land Use Category	Total Acreage 2002
Prime Farmland	24,762
Farmland of Statewide Importance	4,856
Unique Farmland	5,683
Irrigated Farmland	4
Non-irrigated Farmland	0
Farmland of Local Importance	32,698
IMPORTANT FARMLAND SUBTOTAL	69,003
Grazing Land	64,955
AGRICULTURAL LAND SUBTOTAL	133,958
Urban and Built-up Land	0
Other Land	48,043
Water Area	0
TOTAL ACREAGE REPORTED	**182,001**

PART III Land Use Conversion from 2000 to 2002

LAND USE CATEGORY		Prime Farmland	Farmland of Statewide Importance	Unique Farmland	Farmland of Local Importance	Subtotal Important Farmland	Grazing Land	Total Agricultural Land	Urban and Built-up Land	Other Land	Total Converted To Another Use
Prime Farmland[1]	to:	-	1,540	3,248	37,393	-	16,402	58,583	25,760	30,276	114,619
Farmland of Statewide Importance	to:	1,159	-	1,317	21,994	-	5,993	30,453	7,655	21,003	59,121
Unique Farmland	to:	2,301	1,133	-	8,270	-	18,466	29,900	3,628	23,552	57,080
Irrigated Farmland	to:	-	-	-	-	18	2,764	2,782	463	3,847	7,092
Non-irrigated Farmland	to:	-	-	-	-	381	869	1,250	1	493	1,744
Farmland of Local Importance	to:	29,036	19,942	21,579	-	70,557	24,081	94,638	21,542	41,261	157,441
IMPORTANT FARMLAND SUBTOTAL		32,226	22,615	26,144	67,657	149,041	68,575	217,616	59,049	120,432	387,097
Grazing Land	to:	11,885	7,508	26,740	10,996	60,027	-	60,027	34,924	77,906	172,857
AGRICULTURAL LAND SUBTOTAL		44,111	30,123	52,884	78,653	209,068	68,575	277,643	93,973	198,338	569,954
Urban and Built-up Land	to:	6,366	2,118	1,967	8,742	19,424	19,794	39,218	-	50,871	90,089
Other Land	to:	16,971	8,599	15,345	11,007	53,925	25,611	79,536	88,865	-	168,401
TOTAL ACREAGE CONVERTED	**to:**	**67,448**	**40,840**	**70,196**	**98,402**	**282,417**	**113,417**	**396,397**	**182,838**	**249,209**	**828,444**

Source: California Department of Conservation, Department of Land Resource Protection, Farm Land Management Program, 2000-2002 Agricultural Land Conversion Report, Table A-42, accessed at: website: http://www.consrv.ca.gov/DLRP/fmmp/stats_reports/farmland_conv_reports.htm.

[1] *Conversion to Unique Farmland due to delineation of potted plant nurseries throughout the County.*

[2] *The 2000-2002 Land Use Conversion was the most current data at time of publication according to Karen Fitzgerald from the California Department of Conservation, 3-27-07*

4.1.2 *Other Changes Affecting Agriculture*

Urbanization is one of many factors affecting California's farmland resources. Changes in technology, agricultural markets and economics, water availability, and disease-causing organisms or pests are also major influences. These influences result in changes categorized here as bringing land into irrigated use or as removing land from irrigated use.

With certain exceptions, such as rural residential development, changes of this type have less permanency than urban conversion. Land may move in either direction over time, although the FMMP does employ mapping techniques to minimize the effect of annual fluctuations or crop rotation cycles.

Land is moved from irrigated categories when it has not shown evidence of irrigated use for three update cycles (approximately six years). This helps account for short-term fluctuations that are not truly changes in the amount of irrigated farmland. FMMP analysts attempt to confirm changes of this type via site visits when possible. In instances where supplemental information is available, such as documented ecological restoration projects, the three-update standard is waived. Reclassifications from Irrigated to Grazing and Farmland of Local Importance affected 113,980 acres during the 2002 update.

Conversions from irrigated agriculture to Other Land are less common than conversions to Grazing or Dryland Farming categories, but are often more permanent in nature. This held true during the current as well as prior update cycles, though reclassifications into Other Land were 34 percent higher during the 2002 update (78,680 vs. 58,780 acres).

Land is converted to irrigated agricultural use either when dry pastures or native vegetation are converted or when idled land is brought back into production. Market forces are a likely reason landowners make an investment in new or upgraded agricultural facilities. The majority of new irrigated land (63 percent) did not meet the criteria for Prime Farmland.

4.1.3 *Net Land Use Change*

Between 2000 and 2002, urban land in California expanded by 92,750 acres (145 square miles), a 1.6 percent increase compared to the 1998 to 2000 period. Prime Farmland accounted for 21 percent of the urbanization, and 8 percent occurred on other irrigated classes.

The net irrigated farmland loss, at 53,963 acres, was only slightly higher than the Prime Farmland loss of 47,172 acres. This is due to the increase in Unique Farmland of 13,116 acres, which offset decreases in Prime Farmland, Farmland of Statewide Importance, and Interim Irrigated acreage. Agricultural

development on poorer soils took the form of orchards, vineyards, and, to a lesser degree, ornamental or annual crops.

4.2 Ventura County

4.2.1 Agricultural Land Conversion

As previously noted, the most recent available data for Ventura County is for the 2002-2004 period; while some counties in the state have 2004-2006 data, data for Ventura County is currently being compiled and will be available some time later this year.[21] Land converted for the 2002 to 2004 period is shown in **Table 3, Ventura County Agricultural Land Conversion 2002–2004.**

For the two-year period from 2002 to 2004, Ventura County had a decrease of 1,329 acres in the total amount of active agricultural land use mapped by the Department of Conservation in the County. This included 1,044 acres of Important Farmland (all categories) and 285 acres of Grazing Land.

The largest decrease was in Farmland of Local Importance, with 1,227 net acres converted to non-agricultural uses. Farmland of Local Importance is land of importance to the local economy, as defined by each county's local advisory committee and adopted by its Board of Supervisors. Farmland of Local Importance is either currently producing, or has the capability to produce agricultural products, but does not meet the criteria of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Authority to adopt or to recommend changes to the category of Farmland of Local Importance rests with the Board of Supervisors in each county. In Ventura County, Farmland of Local Importance includes Soils that are listed as Prime or Statewide that are not irrigated, and soils growing dryland crops such as beans, grain, dryland walnuts, or dryland apricots.

Decreases also occurred in other farmland categories, with Prime Farmland decreasing 685 net acres and Farmland of Statewide Importance decreasing 225 net acres. The County saw a net increase in Unique Farmland of 1,093 acres.

21 Personal communication with Karen Fitzgerald from the California Department of Conservation, March 27, 2007.

Table 3
Ventura County Agricultural Land Conversion 2002–2004

PART I

Land Use Category	Total Acreage Inventoried		2002–2004 Acreage Changes			
	2002	2004	Acres Lost (-)	Acres Gained (+)	Total Acreage Changed	Net Acreage Changed
Prime Farmland	47,877	47,192	843	158	1,001	-685
Farmland of Statewide Importance	35,204	34,979	299	74	373	-225
Unique Farmland	27,982	29,075	411	1,504	1,915	1,093
Farmland of Local Importance	18,042	16,815	1,295	68	1,363	-1,227
IMPORTANT FARMLAND SUBTOTAL	129,105	128,061	2,848	1,804	4,652	-1,044
Grazing Land	198,372	198,087	957	672	1,629	-285
AGRICULTURAL LAND SUBTOTAL	327,477	326,148	3,805	2,476	6,281	-1,329
Urban and Built-up Land	99,789	101,841	19	2,071	2,090	2,052
Other Land	124,746	124,023	1,497	774	2,271	-723
Water Area	3,939	3,939	0	0	0	0
TOTAL AREA INVENTORIED	555,951	555,951	5,321	5,321	10,642	0

PART II

Land Committed To Nonagricultural Use

Land Use Category	Total Acreage 2004
Prime Farmland	365
Farmland of Statewide Importance	182
Unique Farmland	142
Farmland of Local Importance	1,014
IMPORTANT FARMLAND SUBTOTAL	1,703
Grazing Land	3,910
AGRICULTURAL LAND SUBTOTAL	5,613
Urban and Built-up Land	0
Other Land	1,302
Water Area	0
TOTAL ACREAGE REPORTED	6,914

PART III Land Use Conversion from 2002 to 2004

Land Use Category		Prime Farmland	Farmland of Statewide Importance	Unique Farmland	Farmland of Local Importance	Subtotal Important Farmland	Grazing Land	Total Agricultural Land	Urban and Built-up Land	Other Land	Water Area	Total Converted To Another Use
Prime Farmland[1]	to:	--	0	156	49	205	0	205	556	82	0	843
Farmland of Statewide Importance	to:	1	--	29	7	37	0	37	184	78	0	299
Unique Farmland	to:	3	0	--	9	12	88	100	90	221	0	411
Farmland of Local Importance	to:	108	52	35	--	195	577	772	162	361	0	1,295
IMPORTANT FARMLAND SUBTOTAL		112	52	220	65	449	665	1,114	992	742	0	2,848
Grazing Land	to:	1	1	585	2	589	--	589	346	22	0	957
AGRICULTURAL LAND SUBTOTAL		113	53	805	67	1,038	665	1,703	1,338	764	0	3,805
Urban and Built-up Land	to:	0	0	9	0	9	0	9	--	10	0	19
Other Land	to:	45	21	690	1	757	7	764	733	--	0	1,497
Water Area	to:	0	0	0	0	0	0	0	0	0	--	0
TOTAL ACREAGE CONVERTED	to:	158	74	1,504	68	1,804	672	2,476	2,071	774	0	5,321

Source: California Department of Conservation, Division of Land Resource Protection, Farm Land Management Program, Ventura County Important Farmland Data Availability Website. http://www.consrv.ca.gov/DLRP/fmmp/county_info_results.asp. Accessed on February 16, 2007.

[1] *Conversion to Unique Farmland due to delineation of potted plant nurseries throughout the County.*

4.2.2 *Ventura County Agricultural Crop Production*

The values of crops reported by the Ventura County Agricultural Commissioner for 2005 are shown in **Table 4, Ventura County Agricultural Crop Report 2004 and 2005**. According to the Ventura County Annual Crop and Livestock Report for 2005, the estimated gross value for Ventura County agriculture for Calendar year 2005 was $1,225,109,000. This is an overall decrease of $164,343,000 from 2004. This report reflects gross values only and does not represent the net return to growers.

In terms of dollars, the largest decrease in 2004 was in fruit and crop nuts with a decrease of $87,262,000. These crops include avocados, grapefruit, lemons, navel and Valencia oranges, raspberries, strawberries, tangerines and tangelos, and other miscellaneous fruits and nuts. Because the primary crops grown on the proposed project site are lemons and avocados, the 2004 to 2005 acreage, production, and values for both fruits are shown in **Table 5, Ventura County Avocado and Lemon Acreage, Production and Values 2004 to 2005**.

As illustrated, the amount of total acres harvested in 2005 for avocados and lemons decreased by 1,673 acres from 2004. The production in tons per acre decreased by 1.74 tons per acre for avocados and increased slightly by 3.63 tons per acre for lemons.

4.3 East Area 1 Specific Plan Area

The majority of the project site is actively cultivated with citrus and avocado orchards and a smaller portion, less than 10 acres, is currently used for cultivation of row crops. Main access to the site is from Telegraph Road via Padre Lane. Several paved and dirt access roads traverse the site and foothills to the north. Houses, storage sheds, and a barn exist in the southern and southeastern portions of the site. The site also contains drainage ditches, earthen berms, and a network of irrigation pipes. Santa Paula Creek has been channelized along the west edge of the site. Haun Creek forms the eastern boundary of the site and has not seen any improvement other than some earthen berms.

Table 4
Ventura County Agricultural Crop Report 2004–2005

Crop Groupings	Year	$ Value[1]	Change	Percent Change
Fruit and Crop Nuts	2005	$652,777,000	($87,262,000)	-11.8%
	2004	$740,039,000		
Vegetable Groups	2005	$330,269,000	($24,245,000)	-6.8%
	2004	$354,514,000		
Nursery Stock[2]	2005	$213,661,000	($8,553,000)	-3.8%
	2004	$222,214,000		
Cut Flowers	2005	$51,751,000	($13,912,000)	-21.2%
	2004	$65,663,000		
Field Crops	2005	$1,931,000	($339,000)	-14.9%
	2004	$2,270,000		
Livestock and Poultry	2005	$2,150,000	$208,000	+10.7%
	2004	$1,942,000		
Apiary Products	2005	$509,000	$147,000	+40.6%
	2004	$362,000		
Timber	2005	$62,000	($9,000)	-12.7%
	2004	$71,000		
Sustainable Agriculture	2005	$1,999,000	($378,000)	-15.9%
	2004	$2,377,000		
Grand Total	2005	$1,225,109,000	($164,343,000)	-11.8%
	2004	$1,389,452,000		

*Source: Ventura County Agricultural Commissioner, Annual Crop Report – 2005, p. 1 (see **Appendix A**).*
[1] *Figures are rounded off to nearest $1,000.*
[2] *Includes Cut Christmas Trees*

Table 5
Ventura County Avocado and Lemon Acreage, Production and Values 2004 to 2005

	Production				$ Value			
	Harvested							
Crop	Year	Acreage	Per Acre	Total Unit	Per Unit	Total	Value Change	Percent Change
Avocados	2005	19,206	1.54	29,592 tons	$1,851.95	$54,803,000	($69,859,000)	-56.0%
	2004	19,234	3.28	63,095 tons	$1,975.78	$124,662,000		
Lemons	2005	20,875	19.02	396,939 tons	$451.53	$179,228,000	$2,867,000	1.6%
	2004	22,520	15.39	346,601 tons	$508.83	$176,361,000		

*Source: Ventura County Agricultural Commissioner, Annual Crop Report – 2005, p. 4 (see **Appendix A**).*

4.3.1 Climate

Santa Paula, located in Southern California, is considered a coastal area and experiences many days of sunshine and minimal rainfall. Average monthly high air temperature varies between 67 and 82 degrees Fahrenheit. Recorded daily extremes are 109 degrees Fahrenheit (September 1963) and 25 degrees Fahrenheit (January 1974). Average annual rainfall from 1890 to 2003 is 17.5 inches. Most of the rainfall occurs between October and May, with the months of May to September generally dry.

4.3.2 State Important Farmland Map Designations

As introduced and discussed above, the State Important Farmland Maps show the relationship between the quality of soils for agricultural production and the land's use for agricultural, urban, or other purposes. The current State Important Farmland Map for Ventura County identifies 154 acres of the East Area 1 Specific Plan area as Prime Farmland and 282 acres as Unique Farmland. The remainder of the Specific Plan area is designated as Urban (4 acres) and Other Lands (61 acres). These areas are shown on **Figure 4, East Area 1 Important Farmland Map**.

4.3.3 Water

The water table at the subject property is at a depth of approximately 20 to 40 feet.[22,23] The main sources of water for irrigation are three on-site water wells.[24] Two wells are located on the Teague-McKevitt Ranch; Well No. 4 was drilled in 1968 near the existing barn on site (3N/21W-2R2) and Well No. 6 was drilled in 1988 north of the farm structures (3N/21W-1N2). These wells supply water for both domestic consumption for previous on-site farm worker housing and for agriculture irrigation uses. At the time each of these wells was drilled, they were capable of being pumped at 1,200 gallons per minute (gpm) and 2,500 gpm, respectively. A third well is located on the Newsom Ranch property (3N/21W-11AO1). The drilling of the well was completed on February 18, 1969, and is an Agricultural Irrigation Well.[25] This particular well is an Agricultural Irrigation Well. Pumping capabilities for irrigation wells are not recorded by the County of Ventura.

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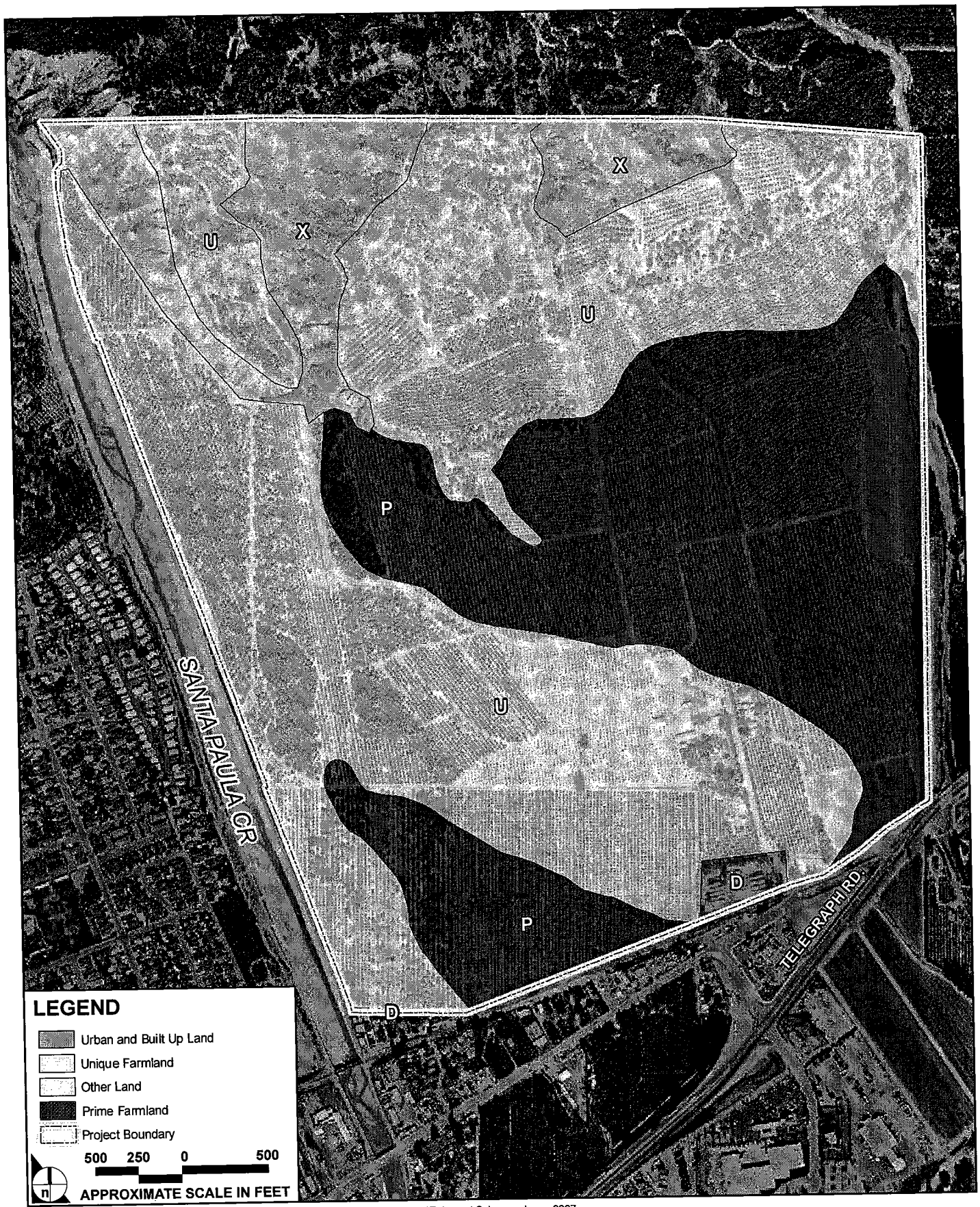
22 Leighton and Associates, Inc. Preliminary Geotechnical Investigation Report, Proposed Mixed Use Development, Limoneira – East Area 1, Santa Paula, California, Unincorporated Ventura County, California, January 23, 2007, p.14.

23 Phase I Environmental Site Assessment and Limited Phase II Assessment, Limoneira and Newsome Ranches, Ventura County, California, January 18, 2007.

24 Ibid.

25 Telephone correspondence with Ms. Barbara Council, County of Ventura, Water Resources Division.



SOURCE: California Department of Conservation, State Important Farmland Map - 2007, Impact Sciences, Inc. – 2007

FIGURE 4

East Area 1 Important Farmland Map

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4.3.4 Soils

As defined by USDA, Prime Farmland is land that has the best combination of physical and chemical characteristics for producing agricultural crops. Prime Farmland soils produce the highest yields with minimal energy and economic resources, and farming in these soils results in the least damage to the environment. Based on the USDA Soil Survey for Ventura County,[26] soils on the East Area 1 Specific Plan area are shown on **Table 6, East Area 1– Soil Types and Agricultural Ratings**. The dominant soil types on site are Cortina stony sandy loam (CrC) (32 percent of the site), Garretson gravelly loam (GbC) (11 percent), Soper gravelly loam (SvF2) (11 percent) and Pico sandy loam (PcA) (10 percent). The location of soils according to the USDA Soil Survey type are shown on **Figure 5, East Area 1 Soils Map**.

NRCS uses two systems to determine a soil's agricultural productivity: the Soil Capability Classification and the Storie Index Rating System. The "prime" soil classifications of both systems indicate the absence of soil limitations, which, if present, would require the application of management techniques (e.g., drainage, leveling, special fertilizing practices) to enhance production.

The Soil Capability Classification System takes into consideration soil limitations, the risk of damage when the soils are used, and the way in which soils respond to treatment.

Capability classes range from Class I soil, which have few limitations for agriculture, to Class VII soils, which are unsuitable for agriculture. Generally, as the range of the capability classification increase, the yields and profits are more difficult to obtain. The classes are defined as follows:

- Class I soils have slight limitations that restrict their use.
- Class II soils have moderate limitations that restrict the choice of plants or that require moderate conservation practices.
- Class III soils have severe limitations that restrict the choice of plants or that require special conservation practices, or both.
- Class IV soils have very severe limitations that restrict the choice of plants or that require very careful management, or both.
- Class V soils are subject to little or no erosion but have other limitations, impractical to remove, that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.
- Class VI soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

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26 U. S. Department of Agriculture, Soil Conservation Service, Soil Survey, Ventura Area, California, 1970.

- Class VII soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.
- Class VIII soils and miscellaneous areas have limitations that preclude commercial plant production and that restrict their use to recreational purposes, wildlife habitat, watershed, or aesthetic purposes.

Table 6
East Area 1– Soil Types and Agricultural Ratings

Symbol	Map Unit Name	Acres	Percent	Capability Grouping	Storie Index	
					Index Rating	Soil Grade
BdG	Badland	32.0	6.4%	VIII	<10	6
CrC	Cortina stony sandy loam, 2 to 9 percent slopes	158.0	31.5%	IV	27	4
GaC	Garretson loam, 2 to 9 percent slopes	17.5	3.5%	II	90	1
GbC	Garretson gravelly loam, 2 to 9 percent slopes[a]	44.3	8.8%	II	63	2
MkG	Millsholm very rocky loam, 30 to 75 percent slopes	34.7	6.9%	VII	4	6
PcA	Pico sandy loam, 0 to 2 percent slopes	50.0	10.0%	II	86	1
PcC	Pico sandy loam, 2 to 9 percent slope	15.2	3.0%	II	77	2
Rw	Riverwash	9.2	1.8%	VIII	<5	6
ScG	San Benito clay loam 50 to 75 percent slopes	6.9	1.4%	VII	8	6
SsE2	Soper loam, 15 to 30 percent slopes, eroded	36.6	7.3%	VI	36	4
SvF2	Soper gravelly loam, 30 to 50 percent slopes, eroded	52.4	10.5%	VII	13	5
SwA	Sorrento loam, 0 to 2 percent slopes	29.4	5.9%	I	100	1
TeF	Terrace Escarpments	3.9	0.8%	VII	<10	6
NA	Fill Material	11.0	2.2%	NA	0	0
Total Soils		**501.1**				

Source: USDA Soil Survey for Ventura County, 1970.

The Storie index rating system ranks soil characteristics according to their suitability for agricultural from Grade 1 soils (80 to 100 rating), which have few or no limitations for agricultural production, to Grade 6 soils (less than a 10 rating), which are not suitable for agriculture. Under this system, soils deemed less than prime can function as prime soils when limitations such as poor drainage, slopes, or soil nutrient deficiencies are partially or entirely removed. The six grades and their range in index ratings are given as follows:

- Soils grade 1 are excellent or well suited to general intensive agriculture.
- Soils grade 2 are good and are also well suited to agriculture, although they are not as desirable as soils of grade 1.

SOURCE: U.S. Department of Agriculture, Soils Conservation Service - 1970, Impact Sciences, Inc. – 2007

FIGURE **5**

East Area 1 Soils Map

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- Soils grade 3 are only fairly well suited to agriculture.
- Soils grade 4 are poorly suited to agriculture.
- Soils grade 5 are very poorly suited to agriculture. Grade 6 soils and miscellaneous areas are not suited to agriculture.

The following are descriptions of the on-site soils:[27]

- Badland (BdG) consists of very steep, severely eroded areas broken by numerous, deeply entrenched drainage channels. The soft, highly erosive sediments are capped with a thin mantle of relatively unstable soil material. This land type produces large amounts of silt and debris. It is nearly barren or has only sparse brush cover. Surface runoff is very rapid, and the erosion hazard is very severe. The natural drainage, subsoil permeability, available water holding capacity, and effective rooting depth all vary. Inherent fertility is low. This land type has no value for farming. Storie Index soil grade: 6; Capability Class: VIII.
- Cortina stony sandy loam (CrC), 2 to 9 percent slopes, is a gently sloping soil of alluvial fans and valley floors. The surface layer is grayish-brown and brown, slightly acid and neutral stony sandy loam about 36 inches thick. It is underlain by very pale brown, neutral, very stony, and cobbly sand. This material extends to a depth of 60 inches or more. Permeability is rapid. Surface runoff is slow, and the erosion hazard is slight. The available water holding capacity is reduced by the number of coarse fragments. About 2 to 3.5 inches of moisture are available in the 60 inches of effective rooting depth. Inherent fertility is low. This soil is used for citrus crops and avocados, for urban development, and for range. Storie Index soil grade: 4; Capability Class: IV.
- Garretson loam (GaC), 2 to 9 percent slopes, is a gently sloping to moderately sloping soil of alluvial fans. The surface layer is grayish-brown and yellowish-brown, slightly acid loam about 35 inches thick. It is underlain by yellowish-brown and pale-brown, mildly alkaline loam and gravelly fine sand loam. This material extends to a depth of more than 60 inches. Permeability is moderate. Surface runoff is slow to medium, and the erosion hazard is slight to moderate. The available water holding capacity is about 8 to 10 inches in the 60 inches of effective rooting depth. Inherent fertility is medium. This soil is used primarily for citrus crops, avocados, vegetables, walnuts, for range development, and for range. These milder slopes are used for vegetables and field crops. Storie Index soil grade: 1; Capability Class: II.
- Garretson gravelly loam (GbC), 2 to 9 percent slopes, is a gently sloping to moderately sloping soil of alluvial fans. This soil is 15 to 35 percent gravel, 2 to 15 millimeters in size throughout the profile. The available water holding capacity is 6 to 7.5 inches in the 60 inches of effective depth. This soil is used mainly for citrus crops, avocados, field crops, vegetables, and for urban development. Storie Index soil grade: 2; Capability Class: II.
- Millsholm very rocky loam (MkG), 30 to 75 percent slopes, is a steep to very steep soil of mountainous uplands. This soil occurs in areas of steep slopes (greater than 50 percent) where 10 to 25 percent of the slope is exposed bedrock. Surface runoff is rapid to very rapid, and the erosion hazard is severe to very severe. This soil is used for range and watershed. Storie Index soil grade: 6; Capability Class: VII.

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27 U. S. Department of Agriculture, Soil Conservation Service, Soil Survey, Ventura Area, California, 1970.

- Pico sandy loam (PcA), 0 to 2 percent slopes, is a nearly level to level soil of alluvial plains and fans. The surface layer is grayish-brown, calcareous sandy loam about 14 inches thick. Below this is light brownish-gray calcareous loam and sandy loam. At a depth of 54 inches, it is very pale brown gravelly coarse sand. Drainage is good. Permeability is moderately rapid. Surface runoff is slow, and there is no erosion hazard. The available water holding capacity is about 5 to 7.5 inches in the 60 inches of effective rooting depth. Natural fertility is medium. This soil is used for vegetables, citrus crops, field crops, walnuts, urban development, and range. Storie Index soil grade: 1; Capability Class: II.

- Pico sandy loam (PcC), 2 to 9 percent slope, is a gently sloping to moderately sloping soil of the alluvial fans. It differs from Pico sandy loam, 0 to 2 percent slopes (PcA), mainly in having steeper slopes. Surface runoff is slow to medium, and the erosion hazard is slight. This soil is used for citrus crops, field crops, walnuts, urban development, and range. The gentle slopes are used for vegetables. Storie Index soil grade: 2; Capability Class: II.

- Riverwash (Rw) occurs in and along channels of perennial and intermittent streams. The material is 60 inches deep. It consists of highly stratified, water-deposited layers of stony and gravelly sand that contain relatively small amounts of silt and clay. This land type is frequently inundated during and immediately following storms. It is subject to scouring and cutting, as well as to deposition, depending on stream flow and bed load. Riverwash is essentially barren. The scant vegetation consists of willows, brush, and related plants. Drainage is excessive. Permeability is very rapid. Surface runoff is rapid, and the erosion hazard is severe. The available water holding capacity is 2 to 3.5 inches in the 60 inch depth. Inherent fertility is low. This land type has no value for farming. It is used for watershed. Storie Index soil grade: 6; Capability Class: VIII.

- San Benito clay loam (ScG), 50 to 75 percent slopes is a very steep soil of the uplands with steep slopes. Included in this soil are small areas of an unnamed, neutral to slightly acid silty clay or clay that is 2 to 4 feet deep over fractured, non calcareous shale. Surface runoff is rapid and the erosion hazard is severe. This soil is used mainly for range and watershed. Storie Index soil grade: 6; Capability Class: VII.

- Soper loam (SsE2), 15 to 30 percent slopes, eroded is a moderately steep or hilly soil of the uplands. This soil is 15 to 35 percent gravel throughout the profile, tends to have a greater clay increase in the subsoil, and has more gentle slopes (as compared to steeper members of the series). Surface runoff is medium to rapid, and the erosion hazard is moderate to severe. The available water holding capacity is about 4 to 7.5 inches in the 24 to 58 inches of rooting depth. This soil is used primarily for avocados, urban development, range, and watershed. Storie Index soil grade: 4; Capability Class: VI.

- Soper gravelly loam (SvF2), 30 to 50 percent slopes, eroded is a steep soil of the uplands. The surface layer is grayish-brown and dark grayish brown, slightly gravelly loam about 11 inches thick. The subsoil is brown, dark-brown, and strong-brown, neutral to medium acid very gravelly sandy clay loam and gravelly clay loam about 46 inches thick. At a depth of about 57 inches is weakly cemented conglomerate. Permeability is moderately slow. Surface runoff is rapid, and the erosion hazard is severe. The available water holding capacity is about 4.5 to 6.5 inches in the 40 to 58 inches of rooting depth. Inherent fertility is medium. This soil is used primarily for range and watershed. Storie Index soil grade: 5; Capability Class: VII.

- Sorrento loam (SwA), 0 to 2 percent slopes, is a nearly level soil of alluvial fans and plains. The surface layer is grayish-brown, neutral, and mildly alkaline loam and heavy loam about 19 inches

thick. Below is grayish-brown and light brownish-gray, moderately alkaline heavy loam that becomes calcareous with increasing depth. Permeability is moderate. Surface runoff is slow and there is erosion hazard. The available water holding capacity is about 8 to 10 inches in the 60 inches of effective rooting depth. Inherent fertility is high. The soil is used primarily for vegetables, field crops, citrus crops, avocados, and walnuts. It is also used for urban development and range. Storie Index soil grade: 1; Capability Class: I.

- Terrace Escarpments (TeF) consist of steep, relatively smooth descending slopes at the ends of terraces. Typically, the soil material varies considerably in characteristics within short distances. Under natural conditions, there is a good vegetative cover of annual grasses and shrubs. The natural drainage, subsoil permeability, available water holding capacity, and effective rooting depth all vary. Surface runoff is rapid and the erosion hazard is severe. Inherent fertility is medium. This land type is used primarily for range and watershed. Some citrus and avocado plantings have been established. Storie Index soil grade: 6; Capability Class: VII.

As shown, the majority of the soils on site have low Storie Index soil grades (4 or greater) and are in Capability Class IV or greater. These soils types are not suitable for general agriculture and have severe limitations for agricultural production. As shown on **Table 7, East Area 1 USDA Agriculture Crop Soil Suitability,** soils on the East Area 1 site have varying potential for crop production.

Soils on the project site that correspond with State Important Farmland Map agricultural land use designations are:

- Prime Farmland: Garretson loam (GaC; 17.5 acres), Garretson gravelly loam (GbC; 44.3 acres), Pico sandy loam (both PcA [50.0 acres] and PcC [15.2 acres]), and Sorrento loam (SwA; 29.4 acres).
- Unique Farmland: Cortina stony sandy loam (CrC; 158.0 acres), Millsholm very rocky loam (MkG, 39.7 acres), Riverwash (Rw; 9.2 acres), Soper loam (SsE2; 36.6 acres), and Soper gravelly loam (SvF2; 54.5 acres).

4.3.5 East Area 1 Specific Plan Area Historical and Current Crop Data

The project site is currently farmed by two organizations, Limoneira Company and Newsom Ranch (owned and operated by the Newsom Family Trust). The Limoneira Company grows avocados and lemons on approximately 336.4 acres and limited row crops on an additional 8.7 acres. The Newsom Family Trust grows avocados and lemons on approximately 60.0 acres. The land currently is under agricultural production is 405.1 acres. The location of existing avocado and lemon orchards as well as other miscellaneous crop (row crop) areas is shown on **Figure 6, East Area 1 Agricultural Uses**.

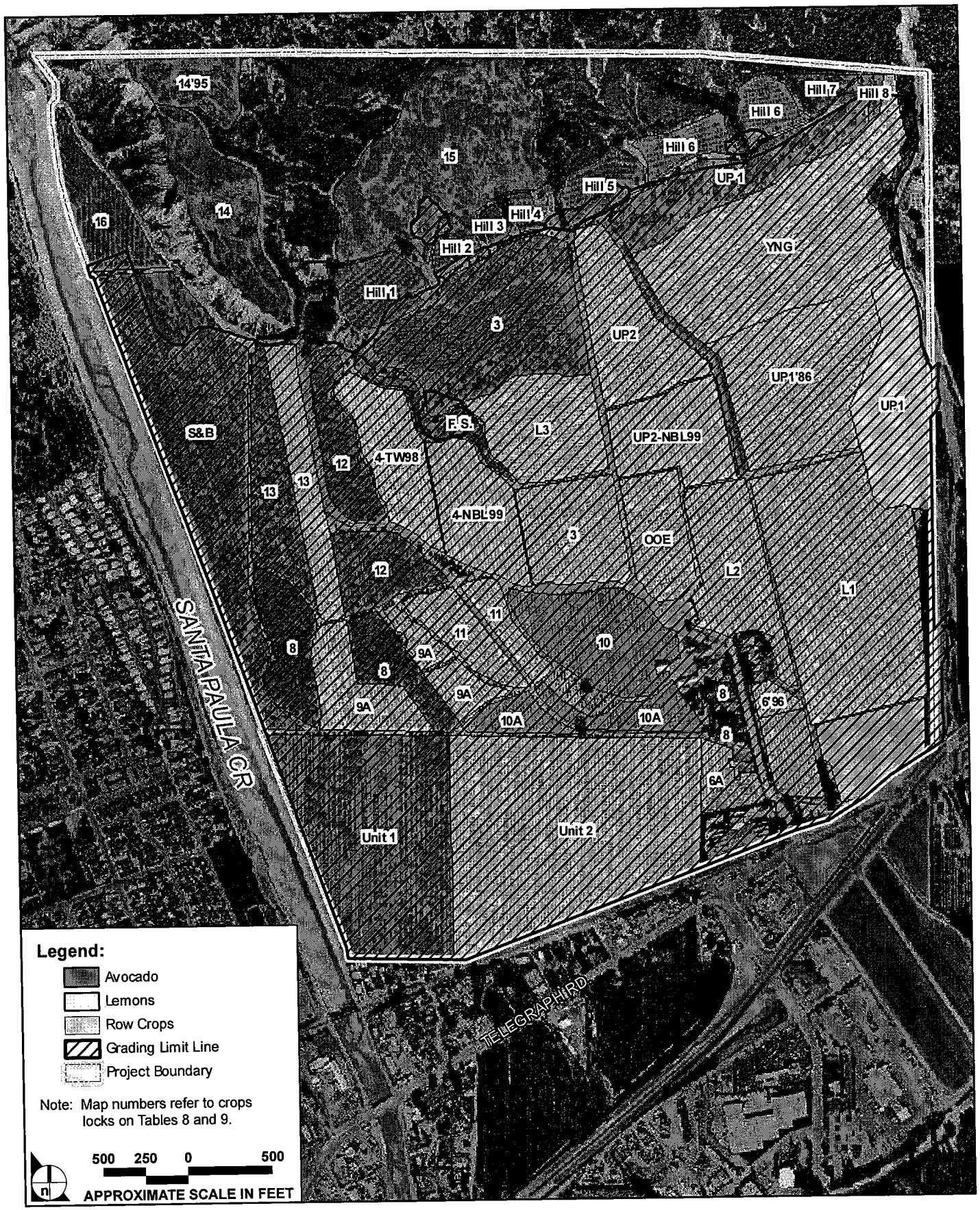
Crop information for 2003 to 2007 was provided by both the Limoneira Company and Newsom Ranch and is summarized in **Table 8, East Area 1 Avocado Crop Data**, and **Table 9, East Area 1 Lemon Crop Data**. The average net revenue per acre for the period from 2003 to 2005 for East Area 1 crops under production was $992 per acre as shown on **Table 10, East Area 1 Average Net Revenue**. The average annual net production revenue for the property from 2003 to 2007 was $417,253.

Table 7
East Area 1 USDA Agriculture Crop Soil Suitability

Soil Type	Total Acres	Acres to be Converted	Potential Acres to be Converted by Crop Suitability				
			Avocados	Citrus	Field Crops	Vegetables	Walnuts
Badland (BdG)	32.0	0.0					
Cortina stony sandy loam (CrC)	158.0	146.6	146.6	146.6			
Garreston loam (GaC)	17.5	17.5	17.5	17.5	17.5	17.5	17.5
Garreston gravelly loam (GbC)[1]	44.3	44.3	44.3	44.3	44.3	44.3	
Millsholm very rocky loam (MkG)	34.7	0.5					
Pico sandy 14.3 loam (PcA)	50.0	50.0		50.0	50.0	50.0	50.0
Pico 0.0 sandy loam (PcC)	15.2	12.7		12.7	12.7	12.7	12.7
Riverwash (Rw)	9.2	4.7					
San Benito clay loam (ScG)	6.9	0.0					
Soper loam (SsE2)	36.6	36.0	36.0				
Soper gravelly loam (SvF2)	52.4	14.3					
Sorrento loam (SwA)	29.4	29.4	29.4	29.4	29.4	29.4	29.4
Terrace escarpments (TeF)	3.9	0.0	0.0	0.0			
Fill Material[1]	11.0	11.0					
Totals	**501.1**	**367.0**	**273.8**	**300.5**	**153.9**	**153.9**	**109.6**

Source: USDA Soil Survey for Ventura County, 1970.

[1] *It should also be noted that within soils designated as Garretson gravelly loam (GbC) along Haun Creek (approximately 11.0 acres), there exist an area that had been washed out by historical flooding and was filled in with material that is not consistent with the Garrison sandy loam profile. Additionally, these materials are extremely gravelly and have no fertility or crop production ability. This would reduce the actual soil type that meets criteria for Prime Farmland to 153.9 acres.*



SOURCE: Impact Sciences, Inc. – May 2007

FIGURE **6**

East Area 1 Agricultural Uses

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Table 8
East Area 1 Avocado Crop Data

Block No./Description	Variety	Total Trees	Acres	Trees/ Acre	Date Planted	Irrigation System	Production Data									
							2003		2004		2005		2006		2007	
							$ Net Revenue	$/Acre	$ Net Revenue	$/Acre	$ Net Revenue	$/Acre	$ Net Revenue	$/Acre	$ Net Revenue	$/Acre
Limoneira																
UP1	Hass	285	8.0	35.6	NA	MS	19,583	2,448	18,041	2,255	(2,929)	(366)	35,764	4,471	(400)	(50)
F.S.	Hass	310	3.0	3.0	NA	MS	6,603	2,201	7,998	2,666	(1,528)	(509)	18,753	6	(2,172)	(724)
3	Hass	310	3.0	103.3	1979	MS	6,603	2,201	7,998	3	(1,528)	(509)	18,753	6	(2,172)	(724)
3 '96	Hass	1033	10.0	103.3	1996	MS	22,012	2,201	26,662	2,666	(5,092)	(509)	62,510	6,251	(7,241)	(724)
3 '79	Hass	155	1.5	103.3	1979	MS	3,301	2,201	3,999	2,666	(764)	(509)	9,377	6,251	(1,086)	(724)
3 '80	Hass	361	3.5	103.3	1980	MS	7,704	2,201	9,332	2,666	(1,782)	(509)	21,878	6,251	(2,534)	(724)
8	Hass	416	5.0	83.2	1977	MS	15,890	3,178	20819	4,164	(2,555)	(511)	38,092	7,618	(3,557)	(711)
9	Hass	333	4.0	83.2	1977	MS	12,712	3,178	16,655	4,164	(2,044)	(511)	30,473	7,618	(2,844)	(711)
10 NBHO1	Hass	1085	9.2	117.9	2001	MS	0	0	12,272	1,334	(472)	(51)	38,769	4,214	0	0
10A NBHO1	Hass	634	3.0	211.3	2011	MS	0	0	4,002	1,334	(153)	(51)	12,643	4,214	0	0
12	Hass	1,119	10.0	111.9	1971	MS	43,502	4,350	16,274	1,627	(4,409)	(441)	56,800	5,680	(509)	(51)
13	Hass	638	5.7	111.9	NA	MS	24,796	4,350	9,276	1,627	(2,513)	(441)	32,377	5,680	(291)	(51)
14	Hass	707	15.0	64.3	1974	MS	19,524	1,302	8,498	567	(2,792)	(186)	39,566	2,638	(6,669)	(445)
15	Hass	2,031	28.0	72.5	1975	MS	14,279	510	36,639	1,309	(2,155)	(77)	38,853	1,388	(600)	(21)
16	Hass	612	9.0	68.1	1986	MS	14,175	1,575	10,097	1,122	(2,198)	(244)	42,683	4,743	(1,651)	(183)
S&B	Hass	1,872	27.5	68.1	NA	MS	43,312	1,575	30,851	1,122	(6,717)	(244)	130,420	4,743	(5,047)	(184)
Hill 1–5	Hass	632	6.5	97.2	1988	MS	10,081	1,551	13,490	2,075	(1,606)	(247)	26,354	4,054	(422)	(65)
Hill 6–8 '96	Hass	632	6.5	97.2	1966	MS	10,081	1,551	13,490	2,075	(1,607)	(247)	26,354	4,054	(422)	(65)
Subtotal Limoneira			158.4				274,158	1731	258,403	1631	(42,844)	(270)	642,951	4059	(37,617)	-237
Newsom Ranch																
Unit 1	Hass/Mixed	NA	15.0	NA	NA	MS	(13,500)	(900)	37,900	2,526	(3,536)	(235)	18,200	1,213	(10,665)[1]	(711)[1]
Subtotal Newsom							(13,500)	(900)	37,900	2,526	(3,536)	(235)	18,200	1,213	(10,665)[1]	(711)[1]
Total Avocado Crops		**12,827**	**173.4**	**80.9**			**260,658**	**1,503**	**296,303**	**1,709**	**(46,380)**	**(267)**	**661,151**	**3,813**	**(48,282)**	**(278)**

Source: Limoneira Company and Newsom Ranch
Notes:
M = Manual system; F = Flood
(1) Estimate based on corresponding adjacent Limoneira block 8.

Table 9
East Area 1 Lemon Crop Data

Block No./Description	Variety	Total Trees	Acres	Trees/ Acre	Date Planted	Irrigation System	Production Data 2002/2003 $ Net Revenue	2002/2003 $/Acre	2003/2004 $ Net Revenue	2003/2004 $/Acre	2004/2005 $ Net Revenue	2004/2005 $/Acre	2005/2006 $ Net Revenue	2005/2006 $/Acre	2006/2007 $ Net Revenue	2006/2007 $/Acre
Limoneira																
UPI East	Lemons	955	10.0	95.5	1964	MS	(11,503)	(1,150)	NA	NA	NA	NA	NA	NA	NA	NA
UPI YNG	Lemons	2,702	25.1	107.7	1954	F	(39,983)	(1,593)	51,551	2,054	37,308	1,486	71,479	2,848	(3,505)	(140)
UPI '86	Lemons	1,702	17.1	99.5	1986	MS	(31,229)	(1,826)	25,007	1,462	30,348	1,775	64,557	3,775	(2,726)	(159)
L1 AB	Lemons	2,717	27.2	99.9	1967	F	(44,693)	(1,643)	50,364	1,852	44,901	1,651	94,649	3,480	(4,440)	(163)
L2 '98	Lemons	1,085	9.9	109.6	1988	MS	(14,047)	(1,419)	13,323	1,346	13,268	1,340	31,788	3,211	(1,765)	(178)
UP 2	Lemons	1,094	10.0	109.4	1993	MS	(12,544)	(1,254)	13,278	1,328	13,773	1,377	36,418	3,642	(2,207)	(221)
3	Lemons	1,012	9.0	112.4	1990	MS	(14,415)	(1,602)	11,825	1,314	11,433	1,270	24,976	2,775	(1,410)	(157)
L3	Lemons	918	8.0	114.8	1990	MS	(14,578)	(1,822)	17,212	2,152	13,146	1,643	34,219	4,277	(1,687)	(211)
4 TW98	Lemons	780	7.0	111.4	1998	MS	(6,732)	(962)	8,798	1,257	7,427	1,061	23,713	3,388	(1,207)	(172)
4 NBL99	Lemons	984	8.0	123.0	1999	F	(6,375)	(797)	9,123	1,140	14,865	1,858	30,987	3,873	(1,852)	(232)
UP 2 NBL99	Lemons	1,045	8.5	123.0	1999	F	(7,075)	(832)	10,242	1,205	18,550	2,182	39,536	4,651	(2,207)	(260)
6 '96	Lemons	445	4.5	98.9	NA	MS	(5,327)	(1,184)	5,415	1,203	4,048	900	2,877	639	(153)	(34)
6A '98	Lemons	285	2.0	142.5	NA	MS	(3,525)	(1,763)	2,758	1,379	3,831	1,916	7,584	3,792	(421)	(211)
9A	Lemons	1,084	10.0	108.4	1973	MS	(8,229)	(823)	11,130	1,113	9,984	998	17,130	1,713	(1,077)	(108)
11	Lemons	1,064	7.8	136.4	1969	MS	(8,957)	(1,148)	10,714	1,374	10,007	1,283	18,413	2,361	(1,207)	(155)
11A	Lemons	154	1.5	102.7	1986	MS	(2,015)	(1,343)	2,255	1,503	2,326	1,551	5,231	3,487	(272)	(181)
13	Lemons	871	6.4	136.1	1989	MS	3,773	590	(14,096)	(2,203)	15,889	2,483	26,488	4,139	(1,700)	(266)
OOE	Lemons	639	6.0	106.5	NA	MS	(7,585)	(1,264)	7,784	1,297	9,407	1,568	19,329	3,222	(480)	(80)
Subtotal Limoneira		19,536	178.0	109.8			(212,033)	(1,191)	236,683	1,409	260,511	1,551	549,374	3,270	(28,316)	(169)
Newsom Ranch																
Unit 2	Lemons	NA	45.0	NA	NA	MS	(7,271)	(161)	29,832	662	(18,096)	(402)	36,400	809	(4,860)[2]	(108)[2]
Subtotal Newsom			45.0				(7,271)	(161)	29,832	662	(18,096)	(402)	36,400	809	(4,860)[2]	(108)[2]
Total Lemon Crops		**19,536**	**233.0**	**109.8**			**(219,304)**	**(941)**	**266,515**	**1,195**	**242,415**	**1,087**	**585,774**	**2,627**	**(33,176)**	**(149)**

Source: Limoneira Company and Newsom Ranch
Notes:
M = Manual system; F = Flood
(2) Estimate based on corresponding adjacent Limoneira block 8.

Table 10
East Area 1 Average Net Revenue

Crop	Net Revenue Per Acre						Acres Under Production	Average Net Revenue
	2002/ 2003	2003/ 2004	2004/ 2005	2005/ 2006	2006/ 2007	Annual Average		
Avocados	$1,503	$1,709	($267)	$3,813	($278)	$1,296	173.4	$224,726
Lemons	($941)	$1,195	$1,087	$2,627	($149)	$764	223.0	$170,372
Row Crops[1]	NA	NA	NA	NA	NA	NA	8.7	NA
Average per Acre/ Totals	**$281**	**$1,452**	**$410**	**$3,220**	**($214)**	**$1,030**	**405.1**	**$417,253**

Source: Impact Sciences. 2007.

[1] *Various row crops have been planted on occasion on the project site; there is no fiscal information for these crops.*

The Limoneira Company represents the original and current farmers of the majority of this site and provided information on the suitability of the site for agriculture.[28] Crop production in the East Area 1 is limited due to a variety of on-site constraints for agriculture. Due to the extremely rocky content of the soils on the site, only a few types of commercial fruit trees (such as avocados and lemons) have been successfully cultivated on the site. The rocky soil restricts planting and cultivation to limited working of the land, as holes must be dug for each tree to avoid large rocks and boulders. This limits the depth of each hole and individual tree spacing. Other types of crops, such as row crops, cannot be planted on the majority of the site, as the soil is too rocky to till or plow. Existing row crops planted on a small portion of the southeast corner of the site are planted on imported soil; the underlying native soils are too rocky to till or plant, as described previously.

The only tree fruits that have shown any success on site due to the rocky soil conditions have been avocados and lemons. The ability to grow other stock on site is a result of the soil conditions present. As discussed previously, the majority of the soils on site have low Storie Index soil grades (4 or greater) and are in Capability Class IV or greater. These soils types are not suitable for general agriculture and have severe limitations for agricultural production.

The following are descriptions of the Storie Index Soil Grades for the on-site soils as provided by the United States Department of Agriculture in the Ventura Area, California Soil Survey:[29]

- Grade 4 soils are severely limited for crops. If used for crops, they require careful management.
- Grade 5 soils are not suited to cultivated crops but can be used for pasture and range.

28 Farming conditions as reported by Alex Teague of the Limoneira Company, March 13, 2007.

29 U.S. Department of Agriculture, Soil Survey Ventura Area California, April 1970.

- Grade 6 soils consist of soils and land types that generally are not suite to farming.

The following are descriptions of the Soil Capability Class for on-site soils as provided by the United States Department of Agriculture in the Ventura Area, California Soil:[30]

- Class IV soils have very sever limitations that reduce the choice of plants, require very careful management, or both.
- Class V soils are not likely to erode but have other limitations, impractical to remove, that limit their use largely to pasture, woodland or wildlife habitat. There are no class V soils in the Ventura Area.
- Class VI soils have sever limitations that make them generally unsuited to cultivation and limit their use largely to pasture or range, woodland, or wildlife habitat.
- Class VII soils have very sever limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife habitat.
- Class VIII soils and landforms have limitations that preclude their use for commercial plant production and restrict their use to recreation, wildlife habitat, or water supply, or to esthetic purposes.

As shown, the majority of the soils on site have low Storie Index soil grades (4 or greater) and are in Capability Class IV or greater. These soils types are not suitable for general agriculture and have severe limitations for agricultural production. As shown on **Table 7, East Area 1 USDA Agriculture Crop Soil Suitability** soils on the East Area 1 site have varying potential for crop production.

Due to the extremely rocky content of the soils on the site, only a few types of commercial fruit trees (such as avocados and lemons) have been successfully cultivated on the site. The rocky soil restricts planting and cultivation to limited working of the land, as holes must be dug for each tree to avoid large rocks and boulders. This limits the depth of each hole and individual tree spacing. Other types of crops, such as row crops, cannot be planted on the majority of the site, as the soil is too rocky to till or plow.

Of tree crops that can be planted, only lemons and avocados are suitable for the climate. Other citrus tree crops, such as oranges, do not produce competitive sized fruit. As a result of local climate conditions, these drops will experience extreme blossoming which in turn results in too many blossoms and too small fruit. Trees that produce nut require substantial chilling hours (time below freezing); on average commercial nut trees require 700 to 750 hours of chilling hours. This is true of other deciduous tree crops as well.

Market conditions prevent conversion of the avocado orchards to lemons. Market conditions for the past several years have shown that avocado production in the United States is significantly on the decline as

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30 U.S. Department of Agriculture, Soil Survey Ventura Area California, April 1970

other countries (notably Mexico) have seen dramatic increase in avocado production and have substantial acreages of young orchards.[31] As a result of increased imports, avocado prices to the grower have ranged from $ .25 to $ .30 per pound. Based on these prices, crops with root rot that have reduced production capabilities only produce on average about 9,000 per acre. Growers costs have outweighed revenues resulting in a decrease in production and less planting of new orchards. **Table 11, Avocado Economic Summary,** illustrates the recent economic viability for avocado in Southern California.

Table 11
Avocado Economic Summary

Production Costs	
Annual Costs (labor, irrigation, pest control, harvest etc.)	$2,700 per acre
Growers Revenue	
Price per pound	$.25 to $.30
Average production from crops infected with root rot	9,000 lbs/year
Annual Revenue	$2,250 to $2,700
Grower Annual Return (profit)	-$450 to $0

Source: Limoneira Company, 2007.

As shown, the annual return to the grower under recent market conditions shows an economic loss (or break even at best).

These costs do not include capital costs and replanting costs. To replant trees, most growers are moving from 90 to 100 trees per acre (as the current site is planted) to 400 trees per acre. Replanting costs per acre include;

Trees	$9,000
Irrigation	$1,500
Labor and other	$ 500
Total	$11,000

Additionally, replanting will require at least four years before any production and 8 years before reaching peak production.

With these trees, avocados are finding an ever-increasing difficulty in production due to the high occurrence of *phytopthora cinnamomi* (more commonly referred to as "root rot") in the baseline soil, which

31 U.S. Department of Agriculture, Economic Research Service, Agricultural Outlook/USDA Lifts Ban on Mexican Avocados, June 1997

cannot be eliminated. As the root rot condition progresses down the hillside into the flatter lands, avocado production on the site will continue to decline. Soil with root rot is not amenable to growing any alternate crops.

The fungus *Phytophthora cinnamomi, (P. cinnamomi)* also referred to as "root rot," has been studied for more than 60 years, and definitive elimination measures have not been found.[32] The fungus is very difficult, if not impossible, to control and completely eradicate. A number of strategies to control the fungus have been used on sites and include:

- Clean Nursery Strategies: The best control for avocado root rot is to prevent introduction of the fungus into the orchard, from the purchasing of already infected plants from nurseries. Nurseries are aware of the infectious root rot and nurseries certified by the local government or local growers are ones that have taken steps in controlling the spread of the disease.

- Selecting low hazard sites: Sites that are typically associated with root rot include soil with poor drainage, high clay content, high water tables, hard pans, clay pans, or where water pools after irrigation or rainfall.

- Planting on mounds in more hazardous sites: Planting on mounds on sites that are already infected with root rot would allow breaking up of the soil and provides young trees a well-drained soil to become established in before they encounter the more hazardous surrounding soil.

- Preventing the introduction of *P. cinnamomi*: Groves should be fenced to protect them from human and animal traffic. All soil or water should be prevented from movement into diseased groves into healthy ones. Boxes of copper sulfate may be placed at the property entrance and all workers and visitors are asked to dust their shoes with this material before entering. Diversion furrows should be dug to divert rainwater, which passes through the diseased grove, away from the healthy grove and also to isolate healthy groves from diseased ones.

- Using resistant rootstocks: Breeding and selection program around the world have identified rootstocks with a high degree of tolerance to *P. cinnamomi.* To use rootstocks that are resistant to the disease, they must be clonally propagated so that they all contain the same genetic identity. This process has the greatest possibility of successfully controlling avocado root rot in the long run.

- Preventing over or under irrigation: It is difficult to manage irrigation of avocado to benefit the avocado and not *P. cinnamomi,* because avocado roots are very shallow and sensitive to drying. Over watering an area that is already infested by the disease would only exacerbate the situation, because avocado trees already damaged from the disease has fewer roots and less water intake. Over watering would cause the disease to spread to other areas of the site that are not already infected.

- Applying Fungicides: Two fungicides have been very successful at reducing avocado root rot, including Metalaxyl and fosetyl-AI (AlietteR).

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32 University of California Cooperative Extension, Growing Avocados in Ventura County; A Reference Handbook. Updated/Revised January 2000, p. 7.

- Treating with gypsum and the adding or organic mulches: The use of both of these methods adds needed nutrition to the soil for the consumption of the avocado trees. The trees would be vigorous and healthy and much less susceptible to root rot.

The fungus is mobile and will migrate down slopes during periods of rainfall and over watering. As infected sediment is transported, the fungus is transported with it. As is noted above, methods to control the fungus include planting on mounds, prevent the movement of soils and water from diseased groves to healthy areas, preventing over irrigation. As the East Area 1 site is on a slope and the fungus has developed in upslope areas, it is nearly impossible to avoid contamination from upslope areas on the project site. The presence of root rot is does not prevent the growing of other crops. Root rot is confined to certain crops, including avocados.

The average life of trees on the site is more than 20 years old, with many over 30 years old. As trees begin to reach 40 years of age, their production life nears an end. Even if the soil conditions on site were such that replacement trees could be planted, the cost of such planting would be substantial. The cost of replacement trees is approximately $9,000 per acre; based on 400 trees, this would be $22.50 per tree. As previously noted, recent market conditions have resulted in a decline in the avocado market and there is no desire on the growers part to incur costs related to replacement of trees. Further, because the East Area 1 site is infected with root rot, planting replacement trees would not result in increase yield as new trees would most likely become infected.

4.3.6 Adjacent Properties

The project site is located to the northeast of the City of Santa Paula. The western portion of the site is bordered by Santa Paula Creek and residential development. The northern portion of the site is open space and undeveloped land at the foothills of Sulphur Mountain. To the east is the Haun Creek drainage and agricultural lands currently producing avocados and lemons. South of the project site is Telegraph Road, light commercial, and industrial development along Highway 126. Surrounding land uses are shown on **Figure 7, Surrounding Land Use Map**.

5.0 AGRICULTURAL RESOURCE IMPACT EVALUATION METHODOLOGY

This study utilizes a combination of the analysis of factors defined by various agencies for consideration in the analysis of impacts to agricultural resources, including the State Department of Conservation, City of Santa Paula, Ventura County LAFCO, and County of Ventura.

5.1 California Agricultural Land Evaluation and Site Assessment (LESA) Model

The LESA Model was developed by the State Department of Conservation to provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code Section 21095), including in CEQA reviews.[33] The LESA Model is a quantified approach for rating the relative importance of agricultural land resources based upon specific measurable features. The LESA Model considers the agricultural production capabilities of soils, the amount of agricultural land, water availability, the presence of surrounding agricultural lands, and surrounding protected resource lands to determine the significance of the impact of the loss of farmland. Each of these factors is rated, weighted, and combined to produce a single numeric score. This score determines the significance of the impact of the loss of farmland that would occur.

5.2 City of Santa Paula

The site was evaluated in terms of converting important farmland as identified by the State Department of Conservation; removal of lands from agricultural cultivation, removal of agricultural land from a greenbelt and compatibility with existing agricultural operations.

5.3 Ventura LAFCO

As LAFCO relies on the definitions of prime agricultural land under Section 56064 of the Government Code, the site was evaluated in terms of its impacts as to whether a single parcel or contiguous parcels, that qualifies for agricultural use in according with its rating by the NRCS, Storie Index rating, and commercial return (net profit) over a five-year period.

5.4 County of Ventura

In accordance with the County's significance thresholds and analysis methodologies, the site was evaluated for its potential for direct and indirect impacts to the loss of farmland designated as Prime, Statewide Importance, Unique, or Local Importance. In addition, potential indirect impacts associated with water and water quality, change in air quality, introduction of biological organism harmful to agricultural production, and land use compatibility were also examined based on the County's significance thresholds and analysis methodologies.

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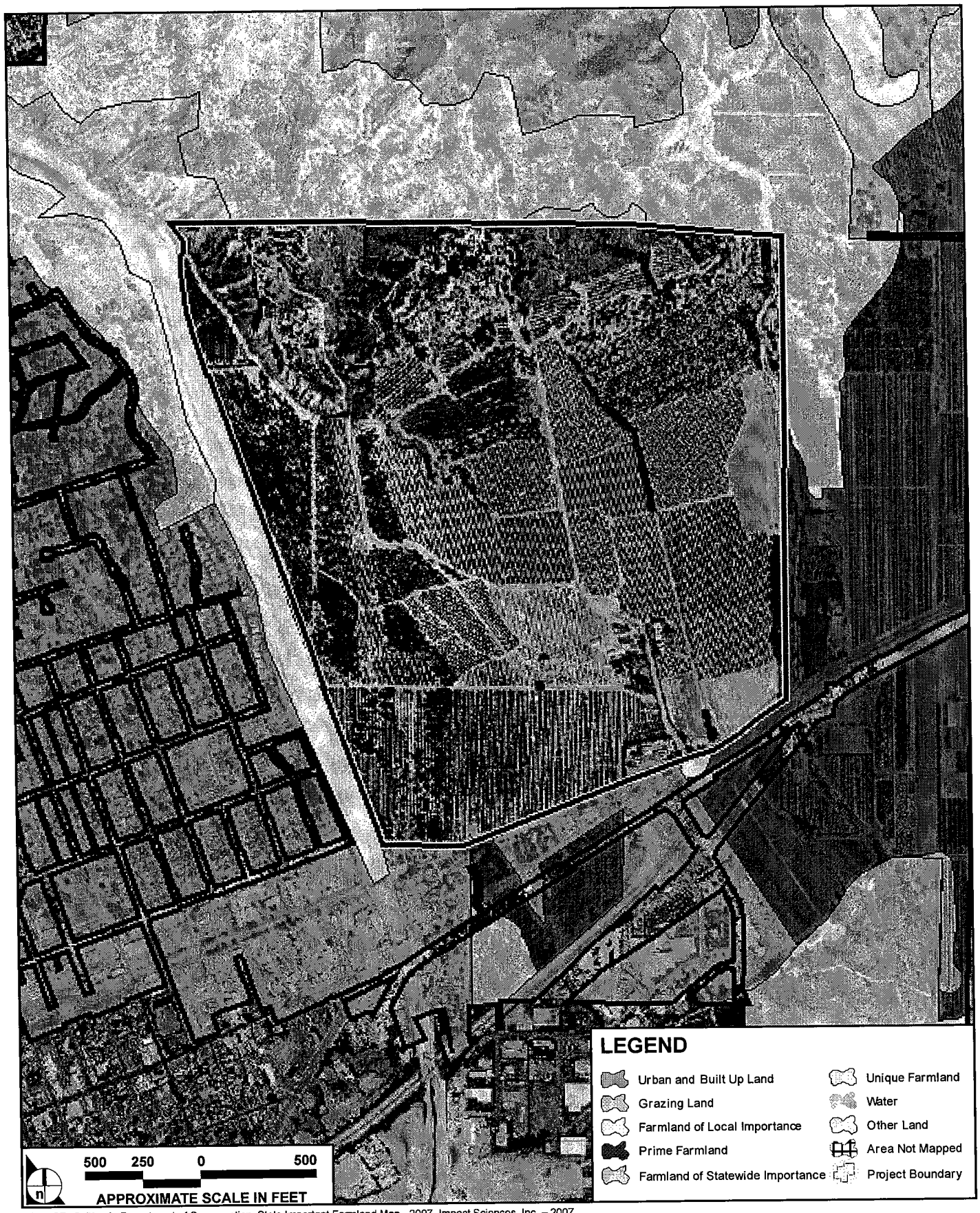
33 California Department of Conservation, Office of Land Conservation, *Land Evaluation and Site Assessment (LESA) Model*, 1997.



SOURCE: California Department of Conservation, State Important Farmland Map - 2007, Impact Sciences, Inc. – 2007

FIGURE 7

Surrounding Land Use Map

831-001•06/07

6.0 THRESHOLDS OF SIGNIFICANCE

CEQA Guidelines Appendix G provides thresholds of significance addressing the significance of the loss of agricultural land as follows:

> *II. AGRICULTURE RESOURCES: 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:*
>
> *a) 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 non-agricultural use?*
>
> *b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?*
>
> *c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?*

6.1 LESA Model Thresholds

The LESA Model is designed to assist in making determinations of the potential significance of a project's conversion of agricultural lands. Scoring thresholds are based upon both the total LESA score and the component Land Evaluation (LE) and Site Assessment (SA) subscores. In this manner, the scoring thresholds are dependent upon the attainment of a minimum score for the LE and SA subscores so that a single threshold is not the result of heavily skewed subscores (i.e., a site with a very high LE score but a very low SA score, or vice-versa). The California Agricultural LESA Model scoring thresholds are shown in **Table 12, LESA Model Scoring Thresholds**.

According to the LESA model threshold of significance, if the total score for a site is 60 points or greater, the loss of agricultural land is considered a significant environmental impact, if the LE and SA subscores are each no less than 20 points.[34]

6.2 City of Santa Paula Thresholds

The City of Santa Paula has identified several factors to be considered in assessing impacts to agriculture in its 1998 General Plan Update Environmental Impact Report.

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34 Use of a conservative score per conversation with Jeannie Blakeslee from the California Department of Conservation March 15, 2007.

Would the project:

- Result in the conversion of state-defined prime soils and soils of statewide importance to urban uses?
- Remove lands from agricultural cultivation?
- Result in the modification or cancellation of a greenbelt agreement?
- Create compatibility problems to existing agricultural operations?

Table 12
LESA Model Scoring Thresholds

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

Source: California Department of Conservation, Office of Land Conservation, California Agricultural Land Evaluation and Site Assessment Model, 1997, p. 31.

6.3 Ventura LAFCO Thresholds

The Ventura LAFCO policy requires specific types of information local agencies need to submit with an application for any action that could be expected to lead to the conversion of agricultural lands. This policy added the following to Policy 2.1.2.1 in the Ventura LAFCO Commissioner's Handbook:

> *Unless specifically waived by the LAFCO Executive Officer, for any proposal which could reasonably be expected to lead to the conversion of agricultural lands (as defined by Government Code Section 56016) to non-agricultural uses, information regarding the effect of the proposal on maintaining the physical and economic integrity of agricultural lands shall be submitted in conjunction with the application. Specifically, the information should address the following:*
>
> *i. The location of, and acreage totals for, prime and non-prime agricultural land involved in the area and adjacent areas. This analysis shall be based on the definition of "prime" agricultural land pursuant to Government Code Section 56064.*
>
> *ii. The effects on agricultural lands within the proposal area*
>
> *iii. The effects on adjacent agricultural lands*
>
> *iv. The effects on the economic integrity of the agricultural industry in Ventura County*

The applicable portions of this policy to the East Area 1 Specific Plan project include identification of the location of, and acreage totals for, prime and non-prime agricultural land involved in the area and adjacent areas. This analysis shall be based on the definition of prime agricultural land as defined by Government Code Section 56064.

The California Government Code (Section 56064) provides a definition of prime agricultural land that must be included in evaluating impacts. The Government Code states:

> *"Prime agricultural land" means 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.*

The portions of the above California Government Code Section 56064 that apply to the East Area 1 Specific Plan site include paragraphs *(a)*, *(b)*, and *(d)*. The site has been in continuous production and does not support livestock; therefore, the remaining paragraphs do not apply.

6.4 County of Ventura Thresholds

The County of Ventura has identified several factors in the County's thresholds that are to be considered in determining the significance of the impact of a project on agricultural resources.[35] The County's Initial Study Assessment Guidelines contains the following questions on factors considered by the County:

- Any project that would result in the direct and/or indirect loss of soils designated as Prime, Statewide Importance, or Unique, or Local Importance will have an impact. Any project that would result in the direct and/or indirect loss of agricultural soils meeting or exceeding the following criteria will be considered as having a significant impact:

General Plan Land Use Designation	Important Farmland Inventory Classification	Acres Lost
Agriculture	Prime/Statewide:	5 ac.
	Unique:	10 ac.
	Local:	15 ac.
Open Space/Rural	Prime/Statewide:	10 ac.
	Unique:	15 ac.
	Local:	20 ac.
All Others:	Prime/Statewide:	20 ac.
	Unique:	30 ac.
	Local:	40 ac.

  Any project that would result in the direct and/or indirect loss of agricultural soils is considered having a contribution to a significant cumulative impact. However, the cumulative loss of agricultural soils was discussed in the Final EIR for the Comprehensive Amendment to the County General Plan (1988). The conclusions of that EIR were that there will be a significant loss of agricultural soils and, although the General Plan contains policies and programs that serve to partially mitigate the cumulative impact, the impact can't be reduced to a less than significant level.

  Therefore, in accordance with Section 15183 of *CEQA Guidelines*, additional cumulative environmental analysis is not required for any project that is consistent with the General Plan. Furthermore, any project that entails a General Plan amendment and would result in the loss of agricultural soil less than that indicated above (project impact), is considered as having a de minimus contribution to a significant cumulative impact and would not require an EIR. Converse, any project entails a General Plan amendment and would result in the loss of agricultural soils equal to or greater than that indicated above is considered as having a substantial contribution to a significant cumulative impact, and would require an EIR.

- Any proposed non-agricultural land use/development that is proposed to use the same water resources as agriculture will have an impact.

  - Ground Water Quality – A use that will decrease the quality of ground water available for agriculture to a level greater than 1,200 mg/l Total Dissolved Solids (TDS) is considered to have a significant and cumulative impact,

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35 Ventura County, Initial Study Assessment Guidelines, February 2006, pp. 37 to 43.

- Ground Water Quantity – A use that will cause a net decrease in the availability of water for agriculture is considered to have a significant project and cumulative impact. This includes uses that may increase the net utilization of ground water in an overdrafted basis or in a basin in hydrologic continuity with a basin in overdraft.

- Surface Water Quality – A use that will decrease the quality of surface water available for agriculture to a level greater than 1,200 mg/l TDS is considered to have a significant project and cumulative impact.

- Imported Water – A use that will cause a net decrease in the availability of imported water supplies currently used by agriculture is considered to have a significant project and cumulative impact.

- Any proposed non-agricultural land use/development located on or within 0.5 mile of property currently in, suitable for, agricultural production may have an impact. Properties suitable for agricultural production include lands designated Prime, Statewide Importance, Unique, and Local Importance by the Important Farmlands Inventory (IFI).

  - Dust – All projects will cause some increase in dust. Any use that will cause a 10 percent or greater increase in dust on agricultural parcels is considered to have a significant impact.

  - Solar Access – Any use that will cause a 10 percent or greater decrease in solar energy for an agricultural parcel is considered to have a significant impact.

  - Tree Row – Any use that will cause the removal of any tree row is considered to have a potentially significant impact, necessitating more detailed review on a case-by-case basis.

  - Other – Any use that will cause a substantial adverse change in an agricultural area's air quality and or microclimate. Other than dust, decreased solar access or tree row removal is considered to have a significant impact.

- Any non-agricultural land use/development that could cause a substantial increase in or introduction of pests and/or disease in an agricultural area will have a significant impact.

- Any proposed non-agricultural land use/development located on or within 0.25 mile of property currently in, suitable for, agricultural production may have an impact. Properties suitable for agricultural production include lands designated Prime, Statewide Importance, Unique, and Local Importance by the Important Farmlands Inventory (IFI).

  Any non-agricultural land use/development, by it nature, design or operation, may pose substantial land use incompatibilities with nearby property currently in, or suitable for, agricultural production will have a significant impact. Although this determination must be made on a case-by-case basis, dwellings, schools, hospitals, care facilities, detention facilities, churches, libraries and outdoor recreational uses are considered potentially significant in the following situations:

  1. Within 300 of irrigated agriculture

  2. Within 200 feet of dry farming

3. Within 100 feet of grazing lands

4. Does not provide perimeter fencing sufficient to keep human and livestock/pets from crossing property lines

Cumulative development exceeding the above criteria will normally be considered as having a substantial effect on agricultural production and cultural practices in the project area (e.g. movement of farm equipment, spraying of farm chemicals).

7.0 IMPACTS OF THE PROPOSED PROJECT ON AGRICULTURAL RESOURCES

CEQA Guidelines Section 15126 requires identification and analysis of the significant environmental effects of a project. Direct and indirect significant effects of the project on the environment shall be clearly identified and described. This section provides an analysis of the effects of the proposed project on the agricultural resources on the project site and the adjacent areas.

7.1 California Agricultural Land Evaluation and Assessment Model

As described above, the LESA model rates the relative quality of land resources, based on specific measurable features. The LESA model is comprised of six weighted factors:

- Two Land Evaluation (LE) factors are based on measures of soil resource quality, and
- Four Site Assessment (SA) factors based on the amount of agricultural land, water availability, surrounding agricultural lands, and the presence of surrounding protected-resource lands.

The analysis considers site-specific information soils, crop production, and other factors to determine the actual production capabilities of land currently used for agricultural purposes that would be converted to urban uses with the proposed project. Where necessary, adjustments were made to correct land use designations based on a detailed review of published data for the site, such as areas that have been backfilled from storm washouts along Haun Creek.

7.1.1 Land Evaluation Factors

Each of the LE factors is rated on a 100-point scale and weighted relative to one another to generate a single numeric potential-significance threshold score, with 100 points as the maximum attainable score.

The Soil Survey, Ventura Area, California was used to determine soil mapping units for the property, as well as the:

- USDA Land Capability Classification (LCC), which rates soil limitations and risk of agricultural damage to soils from outside factors such as change in soil chemistry from the use of herbicides. Class I provides the lowest risk and Class VIII the highest risk for agricultural production and
- Storie Index, which rates the relative degree of soil suitability for intensive agriculture.

Multiplying the proportion of each of the soils on the site by the LESA point rating scale generates a single project site score for each LE factor.

7.1.2 Site Assessment Factors

The project size rating segregates acreage figures for groupings of LCC classes and points are assigned for each of the groupings on a 100-point scale. The model requires use of the highest value from among the groupings; since either of the two represented groupings attained the highest or 100 points, the score of 100 was entered into the model.

Water Resources Availability Rating

First, it was decided to classify water reliability by effects on agricultural production (such as being forced to change to lower-value crops, putting in groundwater pumps, or cutting back on the acreage of the farm) rather than the actual type of limitation (such as a limitation on the quantity, frequency, or duration of water delivery). LESA systems have traditionally focused on the latter; however, it was found that many types of limitations are too varied in California to adequately represent in the LESA system. In the Statewide LESA system, these effects are referred to as restrictions.

Second, the factor had to include an interrelation with cost. The historical shortages and unreliability of California water use has led to the establishment of various interconnected and dual systems. Probably more than any other state, reliability is related to cost – a more reliable water supply can sometimes be obtained, but at a greater cost. These are separated because, generally, a physical restriction is more severe than an economic restriction and this should be reflected in the LESA system.

Third, the factor had to include the effects of the drought cycle in California. During the drought of 1987 through 1992, many agricultural areas of the state experienced water shortages. The impact of these shortages resulted in a number of different actions. Some areas were able to avoid the worst effects of the drought simply by implementing water conservation measures. Other areas were able to obtain additional water supplies, such as by securing water transfers or pumping more groundwater, but at an increase in the overall price of water. Other options included shifting crops, replanting using higher

value crops to offset the increase in water prices, or leaving land fallow. A project site that experiences restrictions during a drought year should not be scored as high as a similar project site that does not.

The scoring of water resources availability for a project site should not just reflect the adequacies of water supply in the past; it should be a prediction of how the water system will perform in the future. For instance, jurisdiction might find that the allocation of flows to stream and river systems have been recently increased for environmental reasons, which will decrease the future available water supplies. In this case, the past history of the site is not an adequate representation of future water supply and water system performance.

The water resources availability rating is based on drought and non-drought restrictions on water supply for the site. Since the site uses only on-site water as its sole source, it received a value of 100, which was entered into the model.

Land Capability Rating

The Land Capability Classification Rating is also part of the LESA Model, and is one of the rating factors to determine a final score for the Land Evaluation Portion of the LESA Model. A description of the Land Capability Classification Rating follows:

The USDA Land Capability Classification (LCC) indicates the suitability of soils for most kinds of crops. Groupings are made according to the limitations of the soils when used to grow crops, and the risk of damage to soils when they are used in agriculture. Soils are rated from Class I to Class VIII, with soils having the fewest limitations receive the highest rating (Class I). Specific subclasses are also utilized to further characterize soils. An expanded explanation of the LCC is included in most soil surveys.

A Zone of Influence (ZOI) was identified and used to determine the final two SA factors: surrounding agricultural land rating and surrounding protected resource land rating. The ZOI includes all parcels within 0.5 mile of the property. The agricultural land rating score is based on the percentage of the ZOI currently producing agricultural crops (53 percent), and the surrounding protected resource land rating is based on the percentage of the ZOI lands with long-term restrictions compatible with or supportive of agricultural land uses, including Williamson Act lands (approximately 20 percent). Each of these values is assigned points based on area and the points appear in the spreadsheet. Of the 501 acres of the project site, approximately 367 acres will be impacted by the proposed East Area 1 development; the remaining acreage will remain in agricultural production or open space.

7.1.3 East Area 1 LESA Scoring

A single LESA score is generated for a given site after all the individual LE and SA factors have been scored and weighted. The LESA model is weighted so that 50 percent of the total LESA score of a given project is derived from the LE factors and 50 percent from the SA factors. Individual factor weights are listed below, with the sum of the factor weights required to equal 100 percent.

The results of the LESA model for the East Area 1 Specific Plan area is shown in **Table 13, East Area 1 LESA Score**. The East Area 1 LESA Score Sheet is provided in **Appendix B**.

With a final LESA Score of 67, and given that each of the LE and SA subscores is greater than 20 points, the loss of farmland that would occur as result of the proposed project is considered significant. This is primarily due to the size of the site, water resource availability, and the land capability classifications of the soils on the site.

7.2 City of Santa Paula Criteria

7.2.1 Conversion of Important Farmland

The City of Santa Paula follows the state Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) in identifying the conversion of state-defined prime soils and soils of statewide importance as an impact to agricultural resources. The State Important Farmland Map for Ventura County has identified a total of 154 acres of Prime Farmland and 282 acres of Unique Farmland on the site (total of 436 acres). Implementation of the proposed project would result in the conversion to urbanized uses of approximately 352 acres of Prime Farmland (approximately 152 acres) and Unique Farmland (approximately 200 acres). **Table 14, East Area 1 Acres of Farmland Converted,** provides details on the conversion of farmland that would occur as a result of the proposed project.

The loss of 352 acres of Prime and Unique Farmland would be a significant impact.

Table 13
East Area 1 LESA Score

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
Land Capability Classification	57.2	0.25	14.3
Storie Index	50.6	0.25	12.7
LE Subtotal		0.5	27.0
SA Factors			
Project Size	100	0.15	15
Water Resource Availability	100	0.15	15
Surrounding Agricultural Land	60	0.15	9
Protected Resource Land	10	0.05	.5
SA Subtotal		0.5	40.5
Final LESA Score			**67.5**

Source: Impact Sciences. 2007.

Table 14
East Area 1 Acres of Farmland Converted

Land Use and Farmland Designation	Total Project	Preserved Agriculture	Farmland Converted	Other Land Converted
Prime Farmland	154 [1]	2	152 [1]	--
Unique Farmland	282	82	200	--
Urban	4	0	0	4
Other	61[1]	50	0	11
Totals	**501**	**134**	**352**	**15**

Source: Impact Sciences. 2007.

[1] *Acreage adjusted to reflect approximately 11 acres of the site that have washed out and refilled*

7.2.2 *Removal of Lands from Agricultural Cultivation*

Currently, approximately 405 acres of the 501-acre site are under cultivation and production on the East Area Specific Plan 1 site. This includes approximately 173 acres of avocados, 223 acres of lemons and 9 acres of other miscellaneous row crops. As shown on **Table 15, East Area 1 Farmland Conversion by Crop**, approximately 350 acres of the 405 acres under production would be taken out of production as a result of the proposed project. This includes approximately 118 acres of avocados, 223 acres of lemons and 9 acres of miscellaneous row crops. The remaining 55 acres currently in production along the

northern portion of the site would be designated in the Specific Plan area as Open Space-Agricultural Preserve. The loss of 350 acres of land currently under cultivation would be a significant impact.

Table 15
East Area 1 Farmland Conversion by Crop

Crop	Acres Under Production	Acres Converted	Remaining Acres to be Placed in Agricultural Preserve
Avocados	173	118	55
Lemons	223	223	0
Row Crops	9	9	0
Totals	**405**	**350**	**55**

Source: Impact Sciences. 2007.

7.2.3 *Result in Modification or Cancellation of a Greenbelt*

The proposed East Area 1 Specific Plan property is located in the Fillmore-Santa Paula Greenbelt; amendment of this agreement would be necessary. The greenbelt was adopted by resolution by the participating cities and county. Because the greenbelt was not adopted by ordinance, it can be terminated by any party. The City of Santa Paula General Plan notes that "The City intends to amend the agreement to remove 567 acres that are part of expansions areas East Area 1 and East Area 2."[36]

As the City intends to amend the agreement, impacts would be less than significant.

7.2.4 *Compatibility with Existing Agricultural Operations*

The East Area 1 Specific Plan has been designed to provide dedicated open space adjacent to current open space and agricultural areas. This design is intended to help balance the requirements of a new urbanized area with the need to protect wildlife habitat and provide a buffer to neighboring agricultural operations. Specifically the East Area 1 Specific Plan has incorporated a number of design features intended address the interface between active agriculture and development.

State and federal law restricts pesticide use in certain areas, and "right-to-farm" ordinances alone would not diminish the impact of the restrictions on pesticide use on farming operations.

36 City of Santa Paula, *General Plan*, Land Use Element, Section III.C. Greenbelt Agreements, p. LU-25.

The proximity of urban and agricultural resources could result in spray drift[37] during the application of pesticides within the Agricultural Preserve and from associated off-site farming activities (i.e., Haun Creek area). Studies prepared by the Spray Drift Task Force (SDTF)[38] (See **Appendix D** for more information on these techniques) indicate that pesticide spray applications (e.g., airblast, aerial and ground) utilized in agriculture have the potential to result in spray drift. However, the findings of these studies indicate that the type of spray application and other factors can affect the actual amount of drift which occurs.

There are several techniques that are used to apply pesticides and herbicides to agricultural operations. These include: ground, aerial, airblast and chemigation applications. Ground application are limited to row crops in that the pesticides and herbicides are applied via tractor-mounted sprayers that apply the chemicals over the tops of the crops. Aerial spraying can be applied to both field crops and other crops as it is applied from aircraft flying over fields. Airblast includes tractor-mounted applicators that blast chemical laterally with air pressure into crops; these are typically performed only on orchards and vineyards. Chemigation applications include introducing the chemical through irrigation systems and are used for field crops that require irrigation systems.

The effects of drift spray, that spray which drifts beyond the point of applications, has been studied extensively by the SDTF, which was established in 1990 in response to U.S. EPA spray drift data requirements. The studies of the SDTF were designed and conducted in consultation with scientists at universities, research institutions, and the EPA. The purpose of the SDTF studies was to quantify primary spray drift from all application types. The summary of the SDTF on the effects of spray drift from the various application are provided in the attached materials in **Appendix A** to this review.

For all techniques, findings are presented on the distances that drift spray occurs. For the airblast technique, the findings demonstrate that that drift spray decreased rapidly with distance and approached zero at 100 feet downwind.[39] The study notes that the amount of drift from orchards results from the interactions of many canopy-related factors including tree height and shape, and foliage density, as well as wind speed and direction. Additionally, the type of sprayer equipment (wrapped-around and mist-blower) used was analyzed. The study found that the amount of drift from orchard airblast

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37 The U.S. Environmental Protection Agency (EPA) defines pesticide spray drift as the physical movement of a pesticide through air at the time of application or soon thereafter, to any site other than that intended for application (often referred to as off-target). EPA does not include in its definition the movement of pesticides to off-target sites caused by erosion, migration, volatility, or contaminated soil particles that are windblown after application, unless specifically addressed on a pesticide product label with respect to drift control requirements.

38 Spray Drift Task Force, A Summary of Airblast, Aerial and Ground Application Studies, published by Stewart Agricultural Research Services, Inc., 1997.

39 Ibid.

operations was found to be much lower than often perceived. The study also noted that when drift cannot be reduced to low enough levels by altering spray equipment set-up and application techniques, buffer zones can be imposed to protect sensitive areas downwind of applications. The study also noted that; (1) drift cannot be completely eliminated with current technology; and (2) when drift cannot be reduced to low enough levels by altering spray equipment set-up and application techniques, buffer zones can be imposed to protect sensitive areas downwind of applications.[40]

Given that studies performed by the SDTF indicate that application of the active ingredients utilizing the airblast technique (for oranges) results in a 96 percent adherence rate to the plant and at 100 feet beyond the target application area, the percent of drift approaches zero, the potential for spray drift impacts are greatly reduced. When this information is considered in the context of the distance between the nearest residences (e.g., 150 feet or greater) and on- and off-site agricultural uses, and taken in conjunction with the proposed buffers/vegetative screen, the potential impacts to residences from spray drift would be less than significant.

As proposed in the Specific Plan, the land uses would be compatible with existing agricultural operations that will remain in both the agricultural preserve (on the northern portion of the project site and those to the north off site) and to the east. The project will incorporate buffers along ongoing off-site agricultural operations that may be proximate to development. The proposed buffer, as designed, ranges from at least 150 to 300 feet from the neighboring agricultural operations (which are orchards). Additionally, the buffers include substantial vegetation, as required by the Agricultural Commissioner Guidelines, when there are less than 300 feet to provide for absorption of drift spray. The impacts from drift spray would be less than significant.

Additionally, for areas within the on-site agricultural preserve, restriction will be implemented to limit agricultural practices to modified farming cultural practices, such as the restriction of the use agricultural chemicals and practices (no spraying or dusting) that would generate high levels of dust, noise, and odors.

With the implementation of these measures, the proposed East Area 1 Specific Plan will be compatible with existing agricultural operations. Impacts would be less than significant.

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40 Spray Drift Task Force, A Summary of Airblast, Aerial and Ground Application Studies, published by Stewart Agricultural Research Services, Inc., 1997, p. 10.

7.3 Ventura LAFCO Criteria

As discussed in **Section 6.3**, Ventura LAFCO policy requires specific information to be submitted with an application for any action that could be expected to lead to the conversion of agricultural lands.

7.3.1 Location of, and Acreage Total, for Prime and Non-Prime Farmland

Ventura LAFCO utilizes the California Government Code (Section 56064) definition of prime agricultural land when considering impacts to agricultural land. The Government Code states:

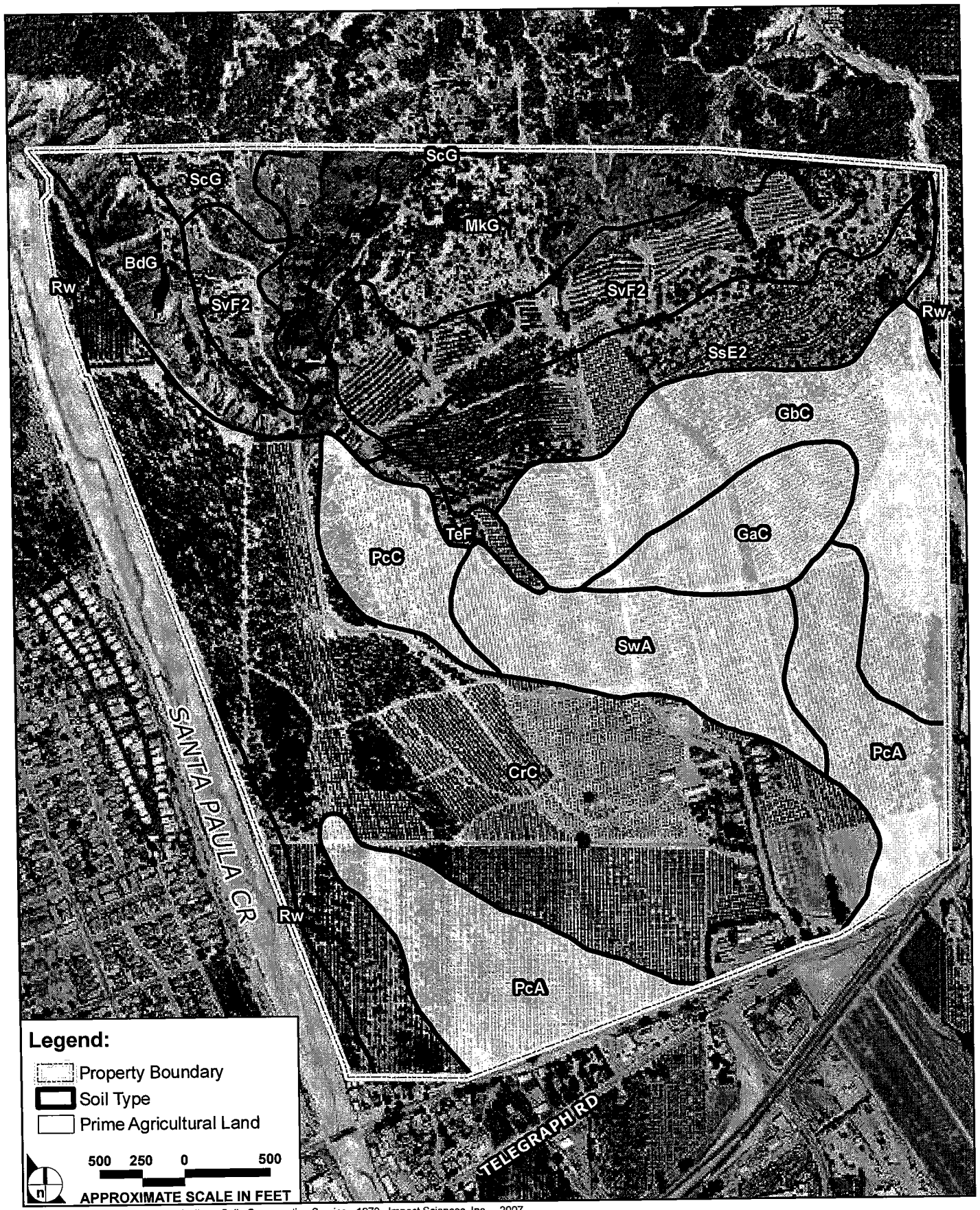
> *"Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:*

Of the definitions provided in the code, the following apply to the East Area 1 site:

> *(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; and*
>
> *(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.*

7.3.1.1 USDA Natural Resources Conservation Service Classifications

The location of Prime Agricultural Land as defined by the California Government Code Section 56064 is shown in **Figure 8, East Area 1 Prime Agricultural Land per USDA Soil Classification**.



SOURCE: U.S. Department of Agriculture, Soils Conservation Service - 1970, Impact Sciences, Inc. – 2007

FIGURE **8**

East Area 1 Prime Agricultural Land per USDA Soil Classification

The proposed project site includes five types of soils that have been classified by the USDA Soil Conservation Service (see Section 4.3.4 Soils) under the Soil Capability Classification System ranking their limitations (or lack thereof) for agricultural production. Approximately 156 acres of the East Area 1 Specific Plan site contain soils identified as either Class I or Class II soils. This includes 29 acres of Class I and 127 acres of Class II soils meeting the criteria of the California Land Conservation Act (Government Code Section 51201). Of the Class I and Class II soils present on the site, approximately 154 acres will be impacted. **Table 16, East Area 1 USDA Soil Conservation Service Soil Classifications**, summarizes the acreage of these soils and impacts.

Table 16
East Area 1 USDA Soil Conservation Service Soil Classifications

Soil Type	Total Acres	Impacted Acreage
USDA Class I		
Sorrento loam – 0 to 2 percent slopes (SwA)	29.4	29.4
UDSA Class II		
Garretson loam – 2 to 9 percent slopes (GaC)	17.5	17.5
Garretson gravelly loam – 2 to 9 percent slopes (GbC)	44.3	44.3
Pico sandy loam –0 to 2 percent slopes (PcA)	50.0	50.0
Pico sandy loam –2 to 9 percent slope (PcC)	15.2	12.7
Subtotal	**127.0**	**124.5**
Total Acres	**156.4**	**153.9**

Source: Impact Sciences. 2007.

7.3.1.2 Storie Index Rating

The proposed East Area 1 Specific Plan project site includes soils that have Storie index ratings by the USDA Soil Conservation Service (see Section 4.3.4 Soils) addressing specific soils functions such as drainage, slope, and nutrient deficiencies. Soils with a Storie index rating of between 80 and 100 are considered "prime" under Government Code Section 56064. On-site soils that have a Storie index rating of between 80 and 100 are shown on **Figure 9, East Area 1 Soils with 80-100 Storie Index Rating**, and include approximately 96.9 acres. All of these soils will be impacted by the proposed project. The Storie index ratings for on-site soils are provided in **Table 17, East Area 1 Site Storie Index Ratings.**

7.3.1.3 Annual Commercial Return

The third criteria that the Government Code Section 56064 utilizes to define 'prime" agricultural land is production value. The code states that "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."

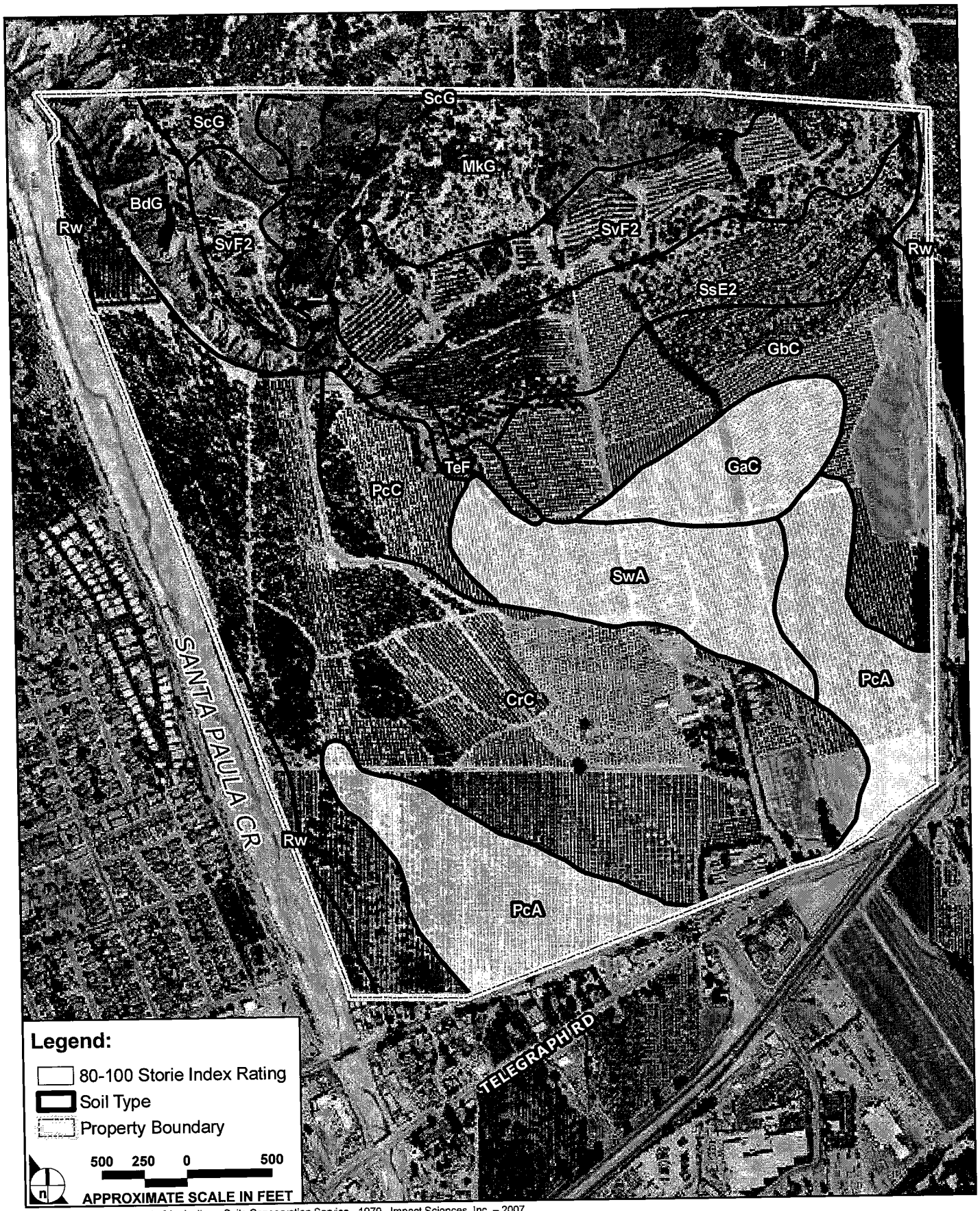
The East Area 1 Specific Plan site has been in continuous production for a number of years (since 1905). The average net revenue per acre for the period from 2003 to 2007 for crops under production on the East Area 1 Specific Plan site was $1,030 per acre, as shown in **Table 10, East Area 1 Average Net Revenue per Acre**. The average annual net production revenue for the property from 2003 to 2007 was $417,253.

Table 17
East Area 1 Site Storie Index Ratings

Soil Type	Storie Index Rating	Existing Acres	Acres Impacted
Storie Index Rating of 80 to 100			
Sorrento loam (SwA)	100	29.4	29.4
Garreston loam ((GaC)	90	17.5	17.5
Pico sandy loam (PcA)	86	50.0	50.0
Subtotal		**96.9**	96.9
Storie Index Rating of below 80			
Pico sandy loam (PcC)	77	15.2	12.7
Garretson gravelly loam (GbC)	63	44.3	44.3
Soper loam (SsE2)	36	36.6	36.0
Cortina stony sandy loam (CrC)	27	158.0	146.6
Soper gravelly loam (SvF2)	13	52.4	14.3
Badland (BdG)	<10	32.0	0.0
Terrace Escarpments (TeF)	<10	3.9	0.0
San Benito clay loam (ScG)	8	6.9	0.0
Millsholm very rocky loam (MkG)	4	34.7	0.5
Riverwash (Rw)	0	9.2	4.7
Fill Material	NA	11.0	11.0
Subtotal		404.2	270.1
Totals		501.1	367.0

Source: Impact Sciences. 2007.

As shown in **Table 18, Crops with an Average Net Return per Acre of $400 or Greater from 2003 to 2007,** of the 415 acres currently under production, approximately 339 acres (155.4 acres of avocados and 183.5 acres of lemons) have averaged a return of more than $400 per acre for the period from 2003 to 2007. Of this, 100.4 acres are planted with avocados and 183.5 acres with lemons. The impacted areas are shown as blocks 14, 15, 16 and Hill 1-8 on **Figure 6.**



SOURCE: U.S. Department of Agriculture, Soils Conservation Service - 1970, Impact Sciences, Inc. – 2007

FIGURE 9

East Area 1 Soils with 80-100 Storie Index Rating

Table 18
Crops with an Average Net Return per Acre of $400 or Greater from 2003 to 2007

Crop	Existing Acres	Acres Impacted
Avocado	155.4	100.5
Lemons	183.5	183.5
Total	**338.8**	**284.0**

Source: Impact Sciences. 2007.

In total, the site contains 369 acres that either have returned over $400 an annual basis and/or contain Class I /II soils and/or soils with a Storie Index rating of 80 to 100 meeting the definition of prime agricultural land as defined in Government Code Section 56064. Of this total, approximately 314 acres would be permitted to convert to non-agricultural uses under the proposed Specific Plan (**Table 19, LAFCO Evaluation Criteria Summary**). **Figure 10, Land Meeting Government Code Section 56064 Criteria**, show the total acreage impacted that are either Class I or II soils or have a net revenue of more than $400 per acre. The loss of 314 acres of farmland meeting the definition of prime agricultural land in the California Government Code Section 56064 would be a significant impact.

Table 19
LAFCO Evaluation Criteria Summary

Evaluation Criteria	Total Acres	Impacted Acres
Location of and Total Acreage of Prime/Non-Prime Farmland		
USDA NRCS Class I and II	156.4	153.9
Storie Index Rating between 80 -100[a]	96.9	96.9
Annual Commercial Return > $400/acre	338.8	284.0
USDA Class I and II	126.4	123.9
Annual Commercial Return < $400/acre	76.0	71.0
UDSA Class I and II	30.0	30.0
Total Acres > $400/acre return and other USDA Class I and II	**368.8**	**314.0**

Source: Impact Sciences. 2007.
Note: a – Soils with a Storie Index rating between 80 – 100 are a subset of USDA NRCS Class I and II soils.

7.3.2 Effects on Agricultural Lands within the Proposal Area

As previously noted in Section 7.2.1, the State Important Farmland Map for Ventura County identifies 154 acres of Prime Farmland and 282 acres of Unique Farmland on the site (a total of 436 acres). Implementation of the proposed project would result in the conversion to non-agricultural uses of

approximately 352 acres of Important Farmlands, made up of 152 acres[41] of Prime Farmland and 200 acres of Unique Farmland.

The loss of Prime and Unique Farmland would be significant.

7.3.3 *Effects on Adjacent Agricultural Lands*

The proposed East Area 1 Specific Plan would preserve open space adjacent to current open space and agricultural areas located to the north and east of the proposed Specific Plan area. This design is intended to ensure the compatibility of this new set of neighborhoods in the City of Santa Paula with neighboring agricultural land. The East Area 1 Specific Plan incorporates a number of design features intended to address the interface between active agriculture areas and the new urban uses that would be permitted by the proposed Specific Plan.

The northern portion of the site is open space and undeveloped land in limited agricultural production at the foothills of Sulphur Mountain along Haun Creek. To the east of the site are the Haun Creek drainage and agricultural lands, which currently produce avocados and lemons.

The East Area 1 Specific Plan incorporates features to protect the public health, safety, and welfare of residents, and protect the economic viability and long-term sustainability of the agricultural industry in Ventura County. Through the East Area 1 Specific Plan design, exposure of the public to agricultural chemicals, dust, noise, and odors can be minimized. Additionally, agricultural operation and land can be protected from vandalism, trespassing, and complaints against standard legal agricultural practices.

The East Area 1 Specific Plan provides for a permanent buffer of open space between the proposed residential uses and existing agricultural operations to the north and east of the site. The approximate locations of these buffer areas are illustrated in **Figure 3, East Area 1 Agricultural Buffers,**

The project would include an agricultural preserve on the northern portion of the Specific Plan area that will include 55 acres of avocado, as previously discussed. This area would be adjacent to new development consisting of single-family residential housing. Agricultural production in the preserve has historically included avocado orchards.

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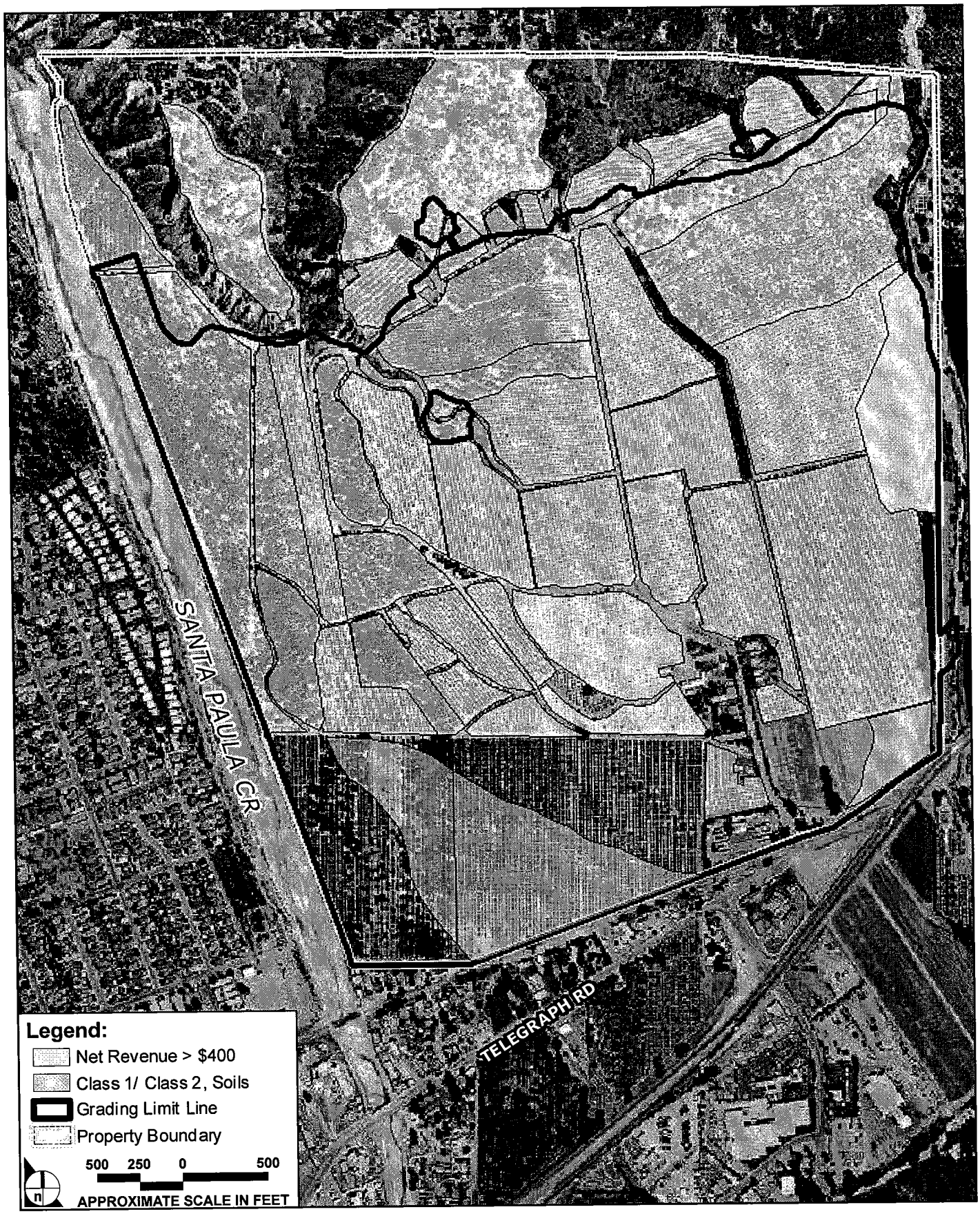
41 Adjusted to account for approximately 11 acres of fill material along the west side of Haun Creek. The area washed out in a flood and, to stabilize the area, was subsequently filled with material that is not conducive to growing.



SOURCE: Impact Sciences, Inc. – May 2007

FIGURE **10**

East Area 1 Land Meeting Government Code Section 56064 Criteria

831-001-06/07

Along the northern portion of the site, an agricultural preserve will be established to protect ongoing farming activities. These have historically included avocado orchards in the foothill areas of the site. To ensure the ability of the avocado orchards to continue to be farmed, a 300-foot setback from the proposed adjacent residential property lines and streets will be established. This preserve will utilize modified farming cultural practices via a legally enforceable covenant that will adequately mitigate impacts between the farmland and adjacent non-farming land uses such as the restriction of the use agricultural chemicals and practices that would generate high levels of dust, noise, and odors. This preserve will use modified farming practices (hand operations, no spraying or dusting, no use of pesticides or herbicides) and a legally enforceable covenant that will adequately mitigate impacts between the farmland and adjacent non-farming land uses to ensure that the avocado orchards can continue to be farmed.

Along the eastern side of the property, near the Haun Creek drainage, the East Area 1 Specific Plan proposes open space that would be used as greenways and for passive recreation. Development would be limited to trails and walkways. These areas would range from a minimum of 150 feet to over 300 feet in width between existing agriculture and proposed new residences in the Specific Plan. In areas that are less than 300 feet wide, a vegetative screen consisting of at least two staggered tree rows and shrubs characterized by evergreen foliage extending from the base of the plants to the crowns would be incorporated into the landscaped design. The trees to be used in the landscape design would be vigorous, drought tolerant, and have a mature height of 15 feet or more. These areas would be continuously maintained.

The buffers are predicated on the County of Ventura Agricultural/Urban Buffer Guidelines[42] that were revised on July 19, 2006, "the purpose of this policy is to protect the public health, safety, and welfare of the citizens of Ventura County and protect the economic viability and long-term sustainability of the Ventura County agricultural industry." This Policy provides guidelines to prevent and/or mitigate conflicts that may arise at the agricultural/urban interface. It applies where urban structures or ongoing non-farming activities are permitted adjacent to land (1) in crop or orchard production; or (2) classified by the California Department of Conservation Important Farmland Inventory as Prime, Statewide Importance, Unique, or Local Importance farmland."[43] The following describes the buffer/setback requirements needed for new development being developed adjacent to qualifying agricultural land: A 300-foot setback to new structures and sensitive uses is required on the non-agricultural property unless a vegetative screen is installed. With a vegetative screen the buffer/setback is a minimum of 150-feet. The fencing requirements are as follows: A reinforced 8-foot chain-link fence with top bar is required on

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42 Ventura County, Agricultural Commissioner, County of Ventura, Agricultural/Urban Buffer Policy – Revised July 19, 2006.

43 Ibid.

applicable urban developments to deter pilferage and vandalism to crops. Placement is nearest the agricultural side. If the agricultural field has a fence, the requirement may be satisfied. The following are minimum standards for vegetative screen:

- Two staggered rows of trees and shrubs characterized by evergreen foliage that extends from the base of the plant to the crown.
- Trees and shrubs should be vigorous, drought tolerant and at least 6 feet in height at the time of installation.
- Plants should have 50 to 75 percent porosity.
- Plant height should vary in order to capture drift within 4 feet of ground applications.
- A mature height of 15 feet or more is required for trees.

The Ventura County Ag Futures Alliance also puts forth guidelines about buffers that coincide with the County of Ventura Agricultural/ Urban Buffer Policy.[44] The following is a discussion from the principals set forth by the Ventura County Ag Futures Alliance:

Principle 1: Buffers are necessary between agriculture and neighboring uses.

Agricultural operations adjacent to urban uses too often result in conflicts leading to restraints on the grower. Buffers protect neighborhoods while allowing agricultural operations to continue.

- Create and maintain buffers between agricultural lands and urban uses. Buffers can be (1) physical separators such as setbacks, vegetative barriers and or fencing; and (2) use-related through transitional zoning, restrictions, and conditions.
- Buffer zones between urban and agricultural areas in cities should be based on consistent standards. The Ventura County Agricultural Policy Advisory Committee (APAC) and the Agricultural Commissioner should develop these consistent standards and monitor compliance by cities and the County.
- Responsibility for the buffer rests with the encroaching urban use, not the pre-existing agricultural use. Without buffers, urban uses can build right up to agricultural operations or the CURB/SOAR line, jeopardizing adjoining agriculture.
- Where no buffer exists or is feasible, the grower should be compensated for any loss of production or value due to the interfering urban use.

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44 Ventura County Ag Futures Alliance, Land Use Principals to Achieve Agricultural Sustainability in Ventura County, Issue Paper No. 3, September 2003.

As proposed, the East Area 1 Specific Plan would permit agricultural production to continue in the northern portion of the site. Agricultural practices (such as the restriction of the use of agricultural chemicals and practices that would generate high levels of dust, noise, and odors, in areas adjacent to residential uses permitted by the Specific Plan) would be conducted in such a way as to ensure compatibility between the agricultural and new residential uses. Specifically, recordation of a legally enforceable covenant is proposed that would restrict this preserve to utilize modified farming cultural practices that will adequately mitigate impacts between the farmland and adjacent non-farming land uses. In addition, buffer areas will be implemented along those areas of the project that will be adjacent to existing agricultural lands to the east across Haun Creek from the Specific Plan Area. With the implementation of these measures, the potential for direct or indirect introduction of biological organisms is low because the ability for animals, other vectors, insects, and pests to carry bio-organisms would be controlled.

Impacts on adjacent agricultural lands would be less than significant.

7.3.4 Effects on the Economic Integrity of the Agricultural Industry in Ventura County

Implementation of the East Area 1 Specific Plan would reduce lemon and avocado production locally. As noted in **Section 4.3.5**, the production in the East Area 1 is limited due to a variety of on-site constraints for agriculture. Due to the extremely rocky content of the soils on site, the terrain is limited to a select few commercial tree fruit type growing conditions. The rocky soil restricts planting and cultivation to limited working of the land, as holes must be dug for each tree to avoid large rocks and boulders, which limits the depth of each hole and individual tree spacing. Other types of crops, such as row crops, cannot be planted on the majority of the site, as the soil is too rocky to till or plow. Existing row crops planted on a small portion of the southeast corner of the site is planted on imported soil; the underlying native soils are too rocky to till or plant.

The only tree fruits that have shown any success on site due to the rocky soil conditions have been avocados and lemons. The production of avocado trees on site is declining due to the high occurrence of *phytopthora cinnamomi* (more commonly referred to as "root rot") in the baseline soil, which cannot be eliminated. As the root rot condition progresses down the hillside into the flatter lands, avocado production on the site will continue to decline. Soil with root rot is not amenable to growing any alternate crops.

The average life of trees on the site is more than 20 years old, with many over 30 years old. As trees begin to reach 40 years of age, their production life nears an end. If the soil conditions on site were such that replacement tress could be planted, the cost of such planting would be substantial.

Avocado production in Ventura County has varied over the past few years as a result of local weather conditions and site-specific production limitations. While the total harvested acreage remained consistent from 2004 to 2005 (approximately 19,200 acres in production), the net production per acre decreased from 63,095 tons in 2004 to 29,592 tons in 2005.

Lemon production in the County has seen a decline in the total acreage harvested from 2004 to 2005 from 22,520 acres to 20, 875 acres. However, the production per acre for 2004 and 2005 for lemons increased from 15.30 tons to 19.02 tons.

The loss of avocados and lemons at the East Area 1 site will result in fewer of these crops being harvested. However, given the poor site conditions, the impact on the economic integrity of these crops will be limited. The loss of approximately 118 acres of avocados and 233 acres of lemon will represent approximately 0.6 percent and 1.1 percent of the current harvested acreage in the County, respectively.

Impacts on the economic integrity of the agricultural industry in Ventura County would be less than significant.

7.4 Ventura County Criteria

7.4.1 Agricultural Resources - Soil

The Ventura County Initial Study Assessment Guidelines provide thresholds to ensure consistent and complete assessment of development/project related impacts on agricultural soils.[45] The Ventura County Initial Study Assessment Guidelines define the issue as "Soil that is utilized or suitable for agricultural crop production. This issue entails the direct loss of agricultural soils due to removal or permanent overcovering, and indirect loss due to increased wind or water erosion."

Portions of the project site are currently designated of Agricultural, Agricultural – Urban Reserve, and Open Space in the County of Ventura General Plan. Specifically, the 436 acres designated Agricultural or Agricultural – Urban Reserve is designated as Prime or Unique Farmland on the State Important Farmland Map. Of this total, approximately 352 acres would be converted to non-agricultural use under the proposed Specific Plan.

The County of Ventura Initial Study Assessment Guidelines state that, for land designated by the General Plan as Agricultural, an impact would occur if either 5 acres of Prime Farmland or Farmland of Statewide Importance is converted, if 10 acres of Unique Farmland is converted, and/or if 15 acres Farmland of Local Importance is converted. For lands designated by the General Plan as Open Space/Rural, the threshold acreages increase to 10 acres, 15 acres, and 20 acres, respectively. Per these criteria, a significant

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45 Ventura County, Initial Study Assessment Guidelines, February 2006, p. 37.