

## 5.2 AGRICULTURAL & FORESTRY RESOURCES

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### 5.2.1 INTRODUCTION

This section describes the existing agricultural resources located on and immediately surrounding the East Gateway Project area including the East Gateway Specific Plan area, potential environmental impacts, recommended mitigation measures to help reduce or avoid identified impacts, and the level of significance of adverse impacts after mitigation.

### 5.2.2 EXISTING CONDITIONS

The East Gateway Project is located within the Sphere of Influence for the City of Santa Paula as approved by the Ventura Local Agency Formation Commission (LAFCo), and outside of the Santa Paula-Fillmore Greenbelt. The East Gateway Project area includes existing residential, commercial and light industrial development, vacant land, and agricultural land.

The portions of the project area within the unincorporated area of Ventura County are designated as Agricultural – Urban Reserve (40-acre minimum), Open Space – Urban Reserve (10-acre minimum), and Existing Community – Urban Reserve in the County of Ventura General Plan.<sup>1</sup> The County zoning designations for the annexation area include Rural Exclusive (RE) for the existing residential area at the northwest edge of the annexation area, Limited Industrial (LI) for the developed areas north and south of Telegraph Road, Open Space (OS) for a few parcels, and Agricultural Exclusive (A-E) for vacant land and land currently in agricultural use.

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.<sup>2</sup>

As shown in **Figure 5.2-1, East Gateway Project State Important Farmland Map Designations**, some of the land proposed for annexation is designated as Important Farmland on the State Important Farmland Map. The parcel proposed for annexation located south of SR 126 and east of S. Hallock Drive is designated as Prime Farmland. A second parcel located west of South Hallock Drive between SR 126 and Telegraph Roads is also designated as Prime Farmland. The parcel located east of Whipple Road between SR 126 and Telegraph Road is primarily designated as Unique Farmland, with the remainder designated as Prime Farmland. One additional parcel located north of Telegraph Road and south of the Santa Paula Branch Rail Line is also designated as Prime Farmland.

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1 Ventura County General Plan, Land Use Map.

2 Santa Paula, General Plan, Land Use Element, p. LU-24.

The East Gateway Specific Plan area includes 25.2-acres of Prime Farmland, 7.8 of acres Urban and Built-up Land, and 3.6-acres of Other Land as designated on the current State Important Farmland Map for Ventura County. The remainder of the area proposed for annexation includes 43.6-acres of Prime Farmland, 8.0-acres of Unique Farmland, 53.6-acres of Urban and Built-up Land, and 6.8-acres of Other Land.

None of the parcels in the East Gateway Project area are under either Williamson Act or Farmland Security Act contracts.<sup>3</sup>

As shown in **Figure 5.2-2, East Gateway Project Soils Map**, soils in the portion of the East Gateway Project area proposed for annexation are comprised of 7.9-acres of Anacapa sandy loam 2 to 9 percent slopes (AcC), 33.5-acres of Cortina stony sandy loam 2 to 9 percent slopes (CrC), 18.5-acres of Mocho gravelly loam 2 to 9 percent slopes (MrC), 31.1-acres of Pico sandy loam 0 to 2 percent slope (PcA), 5.8-acres of Pico sandy loam 2 to 9 percent slopes (PcC), and 7.9-acres of Riverwash (Rw). The East Gateway Specific Plan area is comprised of 7.9-acres of AcC, 0.3-acres of CrC, 10.5 acres of MrC, and 17.9-acres of PcA.

The soils within the East Gateway Specific Plan area have a Storie index rating of 86, 27, 68, and 86 for AcC, CrC, MrC, and PcA, respectively. The soils within the remainder of the areas proposed for annexation have Storie index ratings of 86, 27, 68, 86, 77, and 2 for AcC, CrC, MrC, PcA, PcC, and Rw, respectively.

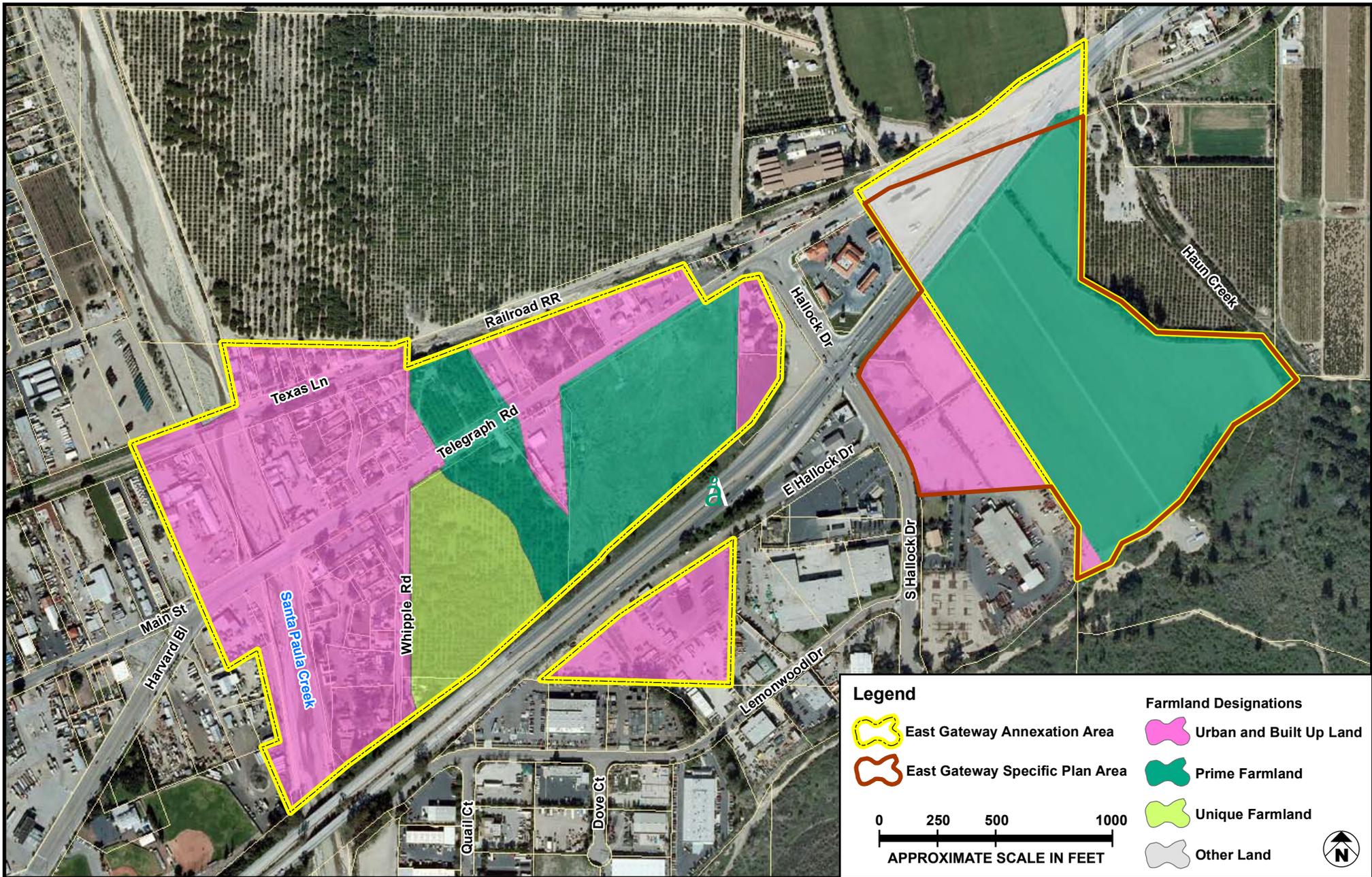
The East Gateway Specific Plan area contains 21.2-acres of row crops; most recently, these included cabbage, parsley, and cilantro. This area is usually cultivated with three to four crops per year. The other areas in the remainder of the area proposed for annexation identified as farmland on the State Important Farmland Map contain approximately 12.4-acres of orchards, with the remaining 11.4-acres lying fallow, having not been actively farmed for the past six years.

According to the Ventura County Annual Crop Report for 2010,<sup>4</sup> the estimated gross value for Ventura County agriculture was \$1,859,151,000. Countywide cabbage was harvested on 4,046 acres and totaled approximately \$22,431,000 in value, cilantro was harvested on 3,309 acres and totaled approximately \$15,862,000 in value, and parsley was harvested on 760 acres and totaled approximately \$7,285,000 in value. Based on the gross revenues per acre for each of these row crops, the individual crop values of crops grown on the East Gateway Specific Plan portion of the project site would range from about

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3 California Department of Conservation, Division of Land Resource Protection, Williamson Act Program, Ventura County Williamson Act Lands, 2009.

4 Ventura County, Office of the Agricultural Commissioner, 2010 Annual Crop Report, July 19, 2011.



SOURCE: California Department of Conservation, Farmland Mapping and Monitoring Program, Ventura County, 2010

FIGURE 5.2-1



SOURCE: USDA, Natural Resources Conservation Service, 2008

FIGURE 5.2-2

\$101,624 to \$203,213 per crop. As this area yields three crops per year, the annual gross revenue from the 21.2-acre East Gateway Specific Plan site for the noted row crops would range from about \$352,500 to \$609,600.

There is limited production within the existing orchards and other agricultural areas within the areas in the reorganization area. However, there is not sufficient information to estimate crop production values at this time.

### 5.2.3 REGULATORY SETTING

#### 5.2.3.1 State Regulations

##### *California Department of Conservation*

The Department of Conservation (DOC), Division of Land Resource Protection, and the Farmland Mapping and Monitoring Program (FMMP)<sup>5</sup> produce 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.

FMMP's study area is contiguous with modern soil surveys developed by the US Department of Agriculture (USDA). A classification system that combines technical soil ratings and current land use is the basis for the Important Farmland Maps of these lands. Most public land areas, such as National Forests and Bureau of Land Management holdings, are not mapped.

The minimum land use mapping unit is 10 acres unless otherwise specified. Smaller units of land are incorporated into the surrounding map classifications. In order to most accurately represent the Natural Resources Conservation Service (NRCS) digital soil survey, soil units of one acre or larger are depicted in Important Farmland Maps.

The FMMP utilizes the following categories to designate farmland:<sup>6</sup>

##### *Prime Farmland (P)*

Farmlands with the best combination of physical and chemical features are able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to

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5 California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>. Accessed July 10, 2012.

6 Ibid, [http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map\\_categories.aspx](http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map_categories.aspx). Accessed July 10, 2012.

produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years before the mapping date.

### ***Farmland of Statewide Importance (S)***

Farmlands 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 before the mapping date.

### ***Unique Farmland (U)***

Farmland 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 before the mapping date.

### ***Farmland of Local Importance (L)***

Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

### ***Grazing Land (G)***

Land on which the existing vegetation is suited to the grazing of livestock.

### ***Urban and Built-up Land (D)***

Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

### ***Other Land (X)***

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 forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

### **Water (W)**

Perennial water bodies with an extent of at least 40 acres.

### **Williamson Act and Farm Land Security Act**

The California Land Conservation Act,<sup>7</sup> 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 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.<sup>8</sup>

The California Department of Conservation, under the Farmland Security Zone Act passed in 1998,<sup>9</sup> allows individual counties to establish an additional program for farmlands to enter into contract with the State 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.

As discussed above, none of the parcels in the East Gateway Project area are under either Williamson Act or Farmland Security Act contracts.<sup>10</sup>

### **5.2.3.2 Local Regulations**

#### **City of Santa Paula**

##### **General Plan**

The Conservation and Open Space Element<sup>11</sup> notes that agriculture has historically been important to the economy of Santa Paula and this importance continues today. As the area urbanizes, commercial agriculture is very slowly being replaced by other land uses. The presence of prime agricultural soils in

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7 Government Code §§ 51200 to 51297.

8 Government Code §§ 16140 through 16154.

9 Farmland Security Zone program enacted by the State Legislature in 1998 at Article 7 commencing with Section 51296 of the Williamson Act.

10 California Department of Conservation, Division of Land Resource Protection, Williamson Act Program, Ventura County Williamson Act Lands, 2009.

11 Santa Paula General Plan, Conservation and Open Space Element, p. CO-4.

the planning area is a natural resource that must be conserved to provide opportunities for ongoing and expanded agricultural operations.

The Conservation and Open Space Element<sup>12</sup> provides the following goals, objectives, and policies that are applicable to agricultural lands within the East Gateway Project area:

*Agriculture and Soils*

Goals

- Goal 3.1 Preserve and protect viable agricultural lands and operations within the City and the expansion areas.
- Goal 3.2 Development should be compatible with and have minimal adverse impacts upon agriculture and natural resources and should not be wasteful of scarce land.
- Goal 3.3 Urban expansion should be directed away from the most productive agricultural areas.

Objectives

- Objective 3(a) Encourage low-intensity land uses and/or barriers near agricultural lands.
- Objective 3(b) Encourage the use of land for agricultural operations.
- Objective 3(c) Include areas for agriculture in the City's land use plan.

Policies

- Policy 3.a.a Preserve viable agriculture and prime agricultural lands as a greenbelt and buffer around the City.
- Policy 3.b.b. Erosion of soils should be controlled and prevented during agricultural use, during storms and especially during the construction phase of new development.
- Policy 3.c.c Develop a transfer of development rights program that provides for easements for the preservation of agricultural land areas within the City's Area of Interest.

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12 Ibid, p. CO-45.

## **Ventura County**

### **General Plan**

Agriculture plays an important role in the National, State, and County economy. Ventura County is one of the principal agricultural counties in the State. Ventura County has adopted a number of programs designed to preserve farmland. These programs include:<sup>13</sup>

- The agricultural land use designation, which establishes a 40-acre minimum parcel size and A-E zoning;
- Participation in Greenbelt Agreements and the Guidelines for Orderly Development with the cities that seek to prevent urban encroachment into agricultural areas;
- Widespread use of Land Conservation Act Contracts to provide tax rate reductions as an incentive for maintaining agriculture;
- Participation in numerous water resource development and conservation programs to ensure long-term availability of water for agriculture.

The Ventura County General Plan provides goals and policies intended to preserve agricultural land uses within the County as a nonrenewable resource.<sup>14</sup> Those applicable to the East Gateway Project include:

#### Goals

- Goal 1. Preserve and protect irrigated agricultural lands as a nonrenewable resource to assure the continued availability of such lands for the production of food, fiber and ornamentals.
- Goal 2. Encourage the continuation and development of facilities and programs that enhance the marketing of County-grown agricultural products.

#### Policies

- Policy 1. Discretionary development located on land designated as Agricultural (see Land Use Chapter) and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory, shall be planned and designed to

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<sup>13</sup> Ventura County, General Plan, Goals, Policies and Programs, last amended on June 28, 2011, p. 19.

<sup>14</sup> Ibid, 19-20.

remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.

Policy 6. Discretionary development adjacent to Agricultural-designated lands shall not conflict with agricultural use of those lands.

### **Agricultural Preserves**

In Ventura County, an agricultural preserve is an area devoted to plant and animal production for commercial purposes, and for other compatible uses. The boundaries of each agricultural preserve are designated by resolution of the Board of Supervisors. Preserves are regulated by rules and restrictions designated in the resolution so that the land within the agricultural preserve is maintained in an agricultural or compatible use. Only land in an agricultural preserve is eligible for Williamson Act contract enrollment.

Agricultural preserves are intended to

- Discourage premature and unnecessary conversion of agricultural land to other uses,
- Preserve agricultural resources,
- Promote the continuance of agricultural operations within the County, and
- Further the agricultural economy of the state and county.

### **Agricultural Commissioner's Office Urban Buffer Guidelines**

The Ventura County Agricultural Commissioner's Office has developed guidelines to address the interface between urban development and existing agricultural uses.<sup>15</sup> The purpose of these guidelines is to protect the public health, safety, and welfare of the residents of Ventura County and protect the economic viability and long-term sustainability of the Ventura County agricultural industry.

These guidelines assist in preventing and/or mitigating conflicts that may arise at the agricultural-urban interface. The guidelines should be applied 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.

Under the guidelines, where applicable, urban developments or non-agricultural uses should be conditioned to provide and maintain a 300-foot setback and chain-link fence on the non-agricultural

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<sup>15</sup> Ventura County, Agricultural Commissioner, Agricultural/Urban Buffer Policy, revised July 19, 2006.

property between the urban use and the agriculture, or a 150-foot buffer/setback if a vegetative screen as described below is used.

New dwellings, non-agricultural work sites, and ongoing outdoor public activities potentially conflict with agricultural operations. Therefore, a buffer or setback and fencing are needed on these sites when they are 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 minimum buffer or setback is 150 feet. With this policy, there are certain standards that would be followed as further described in the Ventura County Agricultural/Urban Buffer Policy.<sup>16</sup>

The proposed project does not include any new residential dwellings or outdoor public activities that would be directly adjacent to ongoing agricultural activities, or would front on active agricultural uses. Additionally, Haun Creek would separate the site from active agricultural activities and provide for a buffer. As such, no additional buffer as noted by the guidelines would be required for the proposed East Gateway Project.

### ***Ventura County Local Agency Formation Commission***

The Ventura County Local Agency Formation Commission (LAFCo) operates pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000<sup>17</sup>. 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 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.

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<sup>16</sup> Ibid.

<sup>17</sup> Government Code §§ 56000, et seq.

- 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 County LAFCo.

The Ventura County LAFCo contains a 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.

Policy 3.1.2.1 in the Ventura LAFCo Commissioner's Handbook states:<sup>18</sup>

*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:*

- 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.*
- The effects on agricultural lands within the proposal area*
- The effects on adjacent agricultural lands*
- 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 Government Code<sup>19</sup> defines "Prime agricultural land" as:

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<sup>18</sup> Ventura Local Agency Formation Commission, Commissioner's Handbook Division 3, 2012, p. 41.

<sup>19</sup> Government Code § 56064.

*"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 Range and Pasture Handbook, Revision 1, December 2003.*
- (d) *Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.*
- (e) *Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.*

### 5.2.4 THRESHOLDS OF SIGNIFICANCE

In order to assist in determining whether a project would have a significant effect on the environment, CEQA identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the *CEQA Guidelines* (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact on agricultural resources if it would:

- 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?
- Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?
- Result in the loss of forestland or conversion of forestland to non-forest use?
- Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?

## 5.2.5 PROJECT IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant with mitigation incorporated, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP that made a reasonable argument that the issue was potentially significant (see Responses to NOP, **Appendix 1.0**).

### 5.2.5.1 Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

#### *Impacts*

The City of Santa Paula follows *CEQA Guidelines*<sup>20</sup> 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, which is considered a significant impact.

As shown in **Figure 5.2-1**, some of the land proposed for annexation within the East Gateway Project area is designated on the State Important Farmland Map as Prime (43.6-acres) and Unique (8.0 acres) Farmland. As discussed above under Existing Conditions, the East Gateway Project area currently contains 21.2-acres of row crops, 12.4-acres of orchards, and 11.4-acres of fallow agricultural land.

In order to be shown on FMMP's Important Farmland Maps as Prime Farmland, land must meet both the following criteria:

- Prime Farmland must have been used for the production of irrigated crops at some time during the two update cycles before the mapping date. In other words, the land has been used for irrigated agricultural production at some time during the four years before the Important Farmland Map date, and
- The soil must meet the physical and chemical criteria for Prime Farmland as determined by the USDA NRCS.

Implementation of the East Gateway Project would result in the conversion of approximately 51.6 acres of active and inactive farmland to non-agricultural uses. The conversion of 32.2 acres of Prime Farmland and 8.0 acres Unique Farmland to non-agricultural uses represents a potentially significant impact to

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<sup>20</sup> 14 California Code of Regulations §§ 15000, et seq.

agricultural resources. The East Gateway Specific Plan area contains approximately 25.2 acres of Prime Farmland, 7.8 acres of Urban and Built-Up Land, and 3.6 acres of Other land; the conversion of 25.2 acres of Prime Farmland within the East Gateway Specific Plan area to non-agricultural use represents a potentially significant impact.

The last two FMMP update cycles for Ventura County, published in 2008<sup>21</sup> and 2010,<sup>22</sup> indicated that the East Gateway Project area contained Prime Farmland and Unique Farmland. A review of 2006 aerial photos showed that 11.4 acres of Prime Farmland (the parallelogram shape surrounded by Urban and Built Up Land on **Figure 5.2-1**), located south of East Telegraph Road, north of SR 126, west of Hallock Drive, as land that has not been agriculturally farmed or irrigated. However, as this area has not been irrigated or actively farmed over the last two update cycles before 2010; this area would not be considered as Prime Farmland.

In accordance with Ventura LAFCo policy, the project area was evaluated in terms of prime agricultural land as defined by Government Code 56064.<sup>23</sup> 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 NRCS and any land containing a Storie Index rating for soils of 80 through 100 is considered prime agricultural land.<sup>24</sup>

The East Gateway Project annexation area includes approximately 94.5 acres. The project does not contain class I soils as defined by the NRCS. The project area contains approximately 63.3 acres of class II soils of which 39.0 acres have a Storie Index rating of 86. Of these 3.15 acres consist of SR 126 and East Telegraph Road and 7.5 acres consist of urban and built up land north of East Telegraph Road (10.65 acres in total). This reduces the actually land available for agricultural use that has a Storie Index rating of 86 or greater within the East Gateway Project area to approximately 28.35 acres of prime agricultural land as defined by Government Code § 56064. All other soils have a class II soil rating with a Storie Index below 80, and as such are not considered prime agricultural farmland according to Government Code § 56064.

Government Code § 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 will return during

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21 California Department of Conservation, Farmland Mapping and Monitoring Program, 2008 Field Report, Ventura County, [http://redirect.conservation.ca.gov/dlrp/fmmp/pubs/2006-2008/field\\_reports/ven08.pdf](http://redirect.conservation.ca.gov/dlrp/fmmp/pubs/2006-2008/field_reports/ven08.pdf). Accessed July 10, 2012.

22 California Department of Conservation, Farmland Mapping and Monitoring Program, 2010 Field Report, Ventura County, [http://redirect.conservation.ca.gov/dlrp/fmmp/pubs/2008-2010/field\\_reports/ven08.pdf](http://redirect.conservation.ca.gov/dlrp/fmmp/pubs/2008-2010/field_reports/ven08.pdf). Accessed July 10, 2012.

23 Government Code § 56064.

24 US Department of Agriculture, Natural Resources Conservation Service, <http://soils.usda.gov/survey/>.

the commercial period on an annual basis not less than \$400 per acre. The East Gateway Specific Plan portion of the project area contains 21.2 acres of land that has returned \$400 per acre on an annual basis that meets this criterion in the Government Code for prime agricultural land.

In total, the East Gateway Project area contains a total of 28.35 acres that has either 1) returned over \$400 per acre on an annual basis or contains Class I/II soils or 2) has a Storie Index rating of 80 to 100, meeting the definition of prime agricultural land as defined in Government Code § 56064. Under the criteria used by the Ventura County LAFCo, the conversion of 28.35 acres of farmland meeting the definition of prime agricultural land contained in the Government Code and used by LAFCo represents a potentially significant agricultural resources impact.

### **Mitigation Measures**

#### **Feasibility Analysis**

The General Plan Conservation and Open Space Element recommends that viable agricultural lands within the City and expansion areas be preserved and protected (Goal 3.1).<sup>25</sup> The General Plan recommends that a transfer of development rights program be instituted that provides for easements for the preservation of agricultural lands within the City's Area of Interest (Policy 3.c.c.).<sup>26</sup> To implement this goal and policy, the General Plan identifies the following planning tools (Implementation Measure 18) to protect agricultural lands, prime agricultural soils, and viable agricultural operations:

- Adoption of an Urban Growth Boundary to achieve long-term conservation goals.
- Adoption of Agriculture Cluster Development as a farmland preservation tool.
- Implementation of a Purchase of Agricultural Conservation Easements Program (PACE) that facilitates the establishment and purchase of Agricultural Conservation Easements (ACE) within the expansion areas, or on County lands within the City's Area of Interest.
- Establishment of an Agricultural and Open Space District to acquire and manage open space and agricultural lands for public use or protection.

The feasibility of each of these is evaluated as potential mitigation.

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25 Santa Paula General Plan, Conservation and Open Space Element, p. CO-45.

26 Ibid, p. CO-55.

### **Adoption of an Urban Growth Boundary**

The City has established an Urban Growth Boundary. The General Plan was amended by the voters in November 2000 through passage of SOAR/ Measure I, which established a City Urban Restriction Boundary (CURB) around the City and General Plan expansion areas known as East Area 2 and Fagan Canyon. According to the Purpose and Findings section of the Measure, the stated first objective is: "Most importantly to involve the public in future development proposals for Expansion Areas, and other properties, outside of the CURB."

For the City to modify the CURB would require a public vote. Since the public previously voted to extend the CURB line to include East Area 2, it is not anticipated that a vote to reverse that would be likely. Additionally, the annexation areas that include prime farmland are already within the CURB boundary.

### **Adoption of Agriculture Cluster Development**

The parcels identified as prime farmland consists of approximately 28.35 acres are not contiguous. As such, they do not lend themselves to cluster development. The areas would remain fragmented and, for the most part, are surrounded by non-agricultural uses that would inhibit productive agricultural operations. Existing surrounding uses (Residential and commercial) are not compatible with continuing agricultural operations and would restrict the ability to use non-organic farming techniques. Efforts to retain them as open space and agricultural uses would continue to be subjected to development pressures. As such, this mitigation is not considered a long-term viable option, and is not feasible.

### **Establishment of an Agricultural and Open Space District**

The establishment of an agricultural and open space district for the areas designated as prime farmland land is not considered feasible. As previously noted the areas designated as prime farmland consists of approximately 28.35 acres on the project site consists of several individual parcels and is not contiguous. As such, efforts to retain them as open space and agricultural uses would continue to be subjected to development pressures.

Additionally, the Project areas are outside of the Santa-Paula Fillmore Greenbelt, as well as the Santa Paula CURB, which serve to protect the agricultural and open space. The cities of Santa Paula and Fillmore re-affirmed the Greenbelt in 2010.

### **Implementation of a Purchase of Agricultural Conservation Easements**

Implementation of conservation agreements to transfer development rights is a feasible mitigation measure. The City has completed similar actions in the past for East Area 1 in requiring the applicant to

record a conservation covenant on lands currently in agricultural production in the proposed agricultural preserve based on production value.

Although none of the Project site is located within an agricultural preserve, a conservation agreement/covenant based on the current production value per acre is feasible.

### **Mitigation Requirements**

The following measures have been identified to mitigate the identified impacts:

- 5.2-1** Before approval of a grading permits that will convert prime farmland as designated on the Department of Conservation's most recent State Important Farmland Map, the applicant must record an agricultural conservation covenant, in a form approved by the City of Santa Paula, on other prime farmland currently under agricultural production within the City of Santa Paula's Area of Interest.

The area of the conservation covenant shall be based on the production value of the prime farmland being taken out of production. The production value shall be determined as the annual average of the total crop value for the four (4) year period prior to the issuance of a grading permit. The conservation covenant shall provide for an equivalent amount of acreage to provide for the same production value on the prime farmland being lost (e.g., if one acre of prime farmland being converted produces \$500,000 of crops per year, then an agricultural covenant shall be placed on one-half [ $\frac{1}{2}$ ] acre of land producing \$1,000,000 per year.)

### ***Residual Impacts***

While the application of a conservation easement will protect future agriculture resources, it will not fully mitigate the loss of existing prime farmland. As such, impacts will be significant and unavoidable.

#### **5.2.5.2 Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

### ***Impacts***

The East Gateway Project area is currently zoned for Rural Exclusive, Limited Industrial, Open Space, and Agricultural Exclusive, as shown on **Figure 2.0-7**.

The portions of the East Gateway Project annexation areas designated for Agricultural Exclusive would be pre-zoned for Agriculture. Therefore, the East Gateway Project annexation areas would not conflict with existing zoning designations. Impacts would be less than significant within the annexation areas outside of the East Gateway Specific Plan.

The East Gateway Specific Plan area is currently zoned as Agricultural Exclusive and would be pre-zoned for Specific Plan. The proposed zoning would be consistent with the existing uses to the southwest and to the north with the East Area 1 proposed development. The proposed Specific Plan would define a single zone for the Specific Plan area, as well as a flexible framework of circulation and infrastructure to support the range of uses identified in the Santa Paula General Plan. The Specific Plan's design character responds to the direction in the General Plan's design to provide for an "east gateway" to the City of Santa Paula; provide appropriate transitions and landscaped buffers along the east edge of the Specific Plan area, which abuts the Santa Paula/Fillmore Greenbelt, and the south edge, which abuts the Santa Clara River; and provide a portion of the westerly edge of the Specific Plan area which faces Hallock Drive to provide an appropriate balance between existing industrial facilities and the proposed commercial uses within the Specific Plan.

The proposed project does not include any new residential dwellings or outdoor public activities that would be directly adjacent to ongoing agricultural activities, or would front on active agricultural uses. Additionally, Haun Creek would separate the site from active agricultural activities and provide for a buffer. As such, no additional buffer as noted by the guidelines would be required for the proposed East Gateway Project.

As the East Gateway Specific Plan would be consistent with existing zoning and land uses to the southwest and the north of the site and would provide appropriate buffers to the south along the Santa Clara River and the west along the Santa Paula/Fillmore Greenbelt, impacts would be less than significant.

The East Gateway Project area does not contain land that is under a Williamson Act contract. Consequently, no impact would occur which would conflict with an existing Williamson Act contract. There would be no impact.

### ***Mitigation Measures***

No mitigation is required.

### ***Residual Impacts***

Impacts would be less than significant.

**5.2.5.3 Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?**

***Impacts***

Forest land is defined as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

Timberland is defined as land, other than land owned by the federal government and land designed by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species must be determined by the board on a district basis.

Timberland production zone, or “TPZ”, is defined as an area which has been zoned pursuant to the Government Code § 51112 or §51113<sup>27</sup> and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in Government Code § 51104(h). With respect to the general plans of cities and counties, “timberland preserve zone” means “timberland production zone.”

The proposed City zones for the East Gateway Project site are Agricultural (A-1), Open Space – Passive (O), Single Family Residential (R-1), Highway Commercial (C-H), Commercial – Light Industrial (C-LI), Industrial with Industrial Park Overlay (I), Open Space – Parks and Recreation (OPR), and Specific Plan (SP). The East Gateway Project would not convert existing zoning, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

***Mitigation Measures***

No mitigation is required.

***Residual Impacts***

No impacts would occur.

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<sup>27</sup> Government Code, Chapter 6.7 – Timberland, §§ 51112 and 51113.

#### **5.2.5.4 Result in the loss of forestland or conversion of forestland to non-forest use?**

##### ***Impacts***

The East Gateway Project does contain forestland or land zoned for forest use. The East Gateway Project would not result in the loss of forestland or conversion of forestland to non-forest use.

##### ***Mitigation Measures***

No mitigation is required.

##### ***Residual Impacts***

No impacts would occur.

#### **5.2.5.5 Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?**

##### ***Impacts***

The proposed East Gateway Project would annex unincorporated areas within the City's Sphere of Influence to implement the City's adopted General Plan. The proposed annexation will eliminate one existing island of unincorporated territory located south of SR 126 and avoid the creation of a second larger island of unincorporated territory when the annexation of the East Area 1 Specific Plan Area, approved by the Ventura LAFCo in March 2011, is recorded. The City's General Plan Land Use Map designates the area south of the East Gateway Project as industrial uses.

The Santa Paula/Fillmore Greenbelt is located to the east of the project area outside of the existing City limits, as shown on **Figure 3.0-3**.

The proposed project does not include any new residential dwellings or outdoor public activities that would be directly adjacent to ongoing agricultural activities, or would front on active agricultural uses. Additionally, Haun Creek would separate the site from active agricultural activities and provide for a buffer. As such, no additional buffer as noted by the guidelines would be required for the proposed East Gateway Project.

A small unnamed drainage (Drainage A as noted in **Section 5.4, Biological Resources**) runs through the East Gateway Specific Plan area and continues along the easterly edges of the plan area. Buildings and parking areas are set back substantially from the centerline of this creek.

The existing zoned agricultural land uses between East Telegraph Road and SR 126 would remain zoned for agricultural uses. As noted on **Figure 2.0-10**, the areas that exist within the reorganization areas north of SR 126 would be zoned A-1.

Other portions of the project area, including the east gateway Specific Plan, would be rezoned from the current Ventura County zoning of AE (Agricultural Exclusive) (see **Figure 2.0-7**) to the City's proposed designation of Specific Plan (SP) (see **Figure 2.0-10**). Approval of the project by the City and LAFCo would result in making the new designation effective, and as such would not result in a conflict. However, it would result in a loss of Farmland (see Impact 5.2.5.1). Impacts would be potentially significant.

There are no other changes that would convert farmland or forestland to non-agricultural and non-forest uses

### ***Mitigation Measures***

The **Mitigation Measure 5.2-1** has been identified to mitigate the identified impacts.

### ***Residual Impacts***

Impacts would be significant and unavoidable.

## **5.2.6 CUMULATIVE ANALYSIS**

### ***Cumulative Impacts***

Cumulative and growth-inducing impacts will likely result from the conversion of farmland to urban uses countywide as the increase in the number of dwelling units, population, and employment continues to 2020.

Within the unincorporated area of Ventura County, any project that would result in the direct and/or indirect loss of agricultural soils is considered as having a contribution to a significant cumulative impact.<sup>28</sup> Although the Ventura County General Plan contains policies and programs that serve to partially mitigate the cumulative impact, the impact cannot be reduced to a less than significant level.

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<sup>28</sup> County of Ventura, Initial Study Assessment Guidelines, April 26, 2011, p. 48.

Therefore, the loss of Prime Farmland and Unique Farmland within the East Gateway Project area and within Ventura County is considered a significant and unavoidable impact.

Implementation of the East Gateway Project would reduce row crop production locally and within the County. The loss of approximately 21.2 acres would represent approximately 0.27 percent of agricultural land harvested in the County (8,115 acres that was comprised of 4,046 acres cabbage, 3,309 acres cilantro, and 760 acres of parsley). Cumulative impacts (the loss of approximately 21 acres of the total of over 8,100 acres planted in similar crops) on the economic integrity of the agricultural industry in the County would be negligible and less than significant.

The following observations are made in the Conservation and Open Space Element relative Adams Canyon, Fagan Canyon and West Area 2.

**Adams Canyon.**<sup>29</sup> The City's greenbelt agreement with the City of San Buenaventura includes lands located west of Adams Barranca, but this greenbelt does not include a northern or southern boundary. It is unclear if the mountainous areas, including Adams Canyon, are subject to the greenbelt agreement. However, the intent of the agreement is to preserve agriculture, and to provide an open space buffer between the urban areas of San Buenaventura and Santa Paula. Development in Adams Canyon affords an opportunity to properly define the Santa Paula-San Buenaventura greenbelt agreement in conjunction with the General Plan update process. Most of the agricultural activity in the canyon is limited to grazing. However, there are a few parcels that support orchards, including one large property at the mouth of the canyon in lemon production. None of these parcels are under Land Conservation (LCA) contracts. Small portions of the canyon floor, particularly near the creek, are considered prime farmland based on the Important Farmlands Inventory criteria. However, most of Adams Canyon is not considered prime farmland.

**Fagan Canyon.**<sup>30</sup> The lower part of Fagan Canyon supports a variety of orchard crops. Avocados are grown on one large parcel in the lower part of Fagan Canyon adjacent to the City, while another nearby parcel is used for lemon production. The less accessible parts of Fagan Canyon are used primarily for ranching activities. Fagan Canyon is not located in an established greenbelt. The only parcels under LCA contract are in the lower part of the canyon. These parcels support avocado and lemon groves. The remaining parcels in Fagan Canyon are not under LCA contract. Most of Fagan Canyon is not prime farmland. Only the area immediately adjacent to Fagan Barranca (in the lower part of the canyon) qualifies as prime farmland under the state's Important Farmlands Inventory system.

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29 Santa Paula General Plan, Conservation and Open Space Element, p. CO-38.

30 Ibid. p. CO-39.

**West Area 2.**<sup>31</sup> All of the area west of the City in the Santa Clara River Valley has high agricultural potential. Most of this area supports a mixture of orchards, including lemons, avocados and oranges. The Calavo and Limoneira plants are located nearby, and are the largest area agricultural businesses growing avocados and lemons, respectively. The agricultural industry has been entrenched in the areas just west of the City for well over 100 years, and is one of the most important facets of the local economy. Surprisingly, none of the area east of Adams Barranca is located in the San Buenaventura-Santa Paula greenbelt. The Land Use Element calls for no urban expansion beyond Adams Barranca to maintain these areas in agriculture and to maintain the physical buffer between Santa Paula and the neighboring City of San Buenaventura. Most of the parcels west of the City and east of Adams Barranca are not under LCA contract. One large parcel in lemon production (located south of the freeway) is under contract. Consequently, LCA contracts do not present a significant constraint to future planning efforts affecting this area. Much of the productive agricultural land in the Santa Clara River Valley west of the current City limit is either considered prime farmland or farmland of statewide importance. Most of the area is prime farmland, including nearly all of the area south of the freeway and east of Adams Barranca. Based on the State's Important Farmlands Inventory system, such prime farmland has the highest potential for continued agricultural use.

The City's General Plan provides for the future development of expansion areas with urban uses into areas that currently support agricultural operations. In doing so, the General Plan provides for the preservation of viable agricultural lands to assist in the preservation of agricultural uses.

The General Plan EIR recognizes that by providing for development in expansion areas, there could be impacts to agriculture including: 1) loss of prime soils and lands of statewide importance; 2) conversion of productive cropland to urban uses; 3) impacts to existing greenbelt agreements; and 4) potential land use conflicts related to agricultural vs. urban uses.<sup>32</sup>

Implementation of the proposed General Plan would result in a long-term commitment to nonagricultural uses in areas that currently support prime soils, particularly within the flatland expansion areas (West Area 2 and East Area 2).<sup>33</sup> Portions of Adams Canyon and Fagan Canyon also support high quality soils, mostly within their lower reaches, particularly in natural drainage areas. Since the location of proposed land uses within the expansion areas has not been established, it is assumed that all prime soils within these areas could be impacted. The loss of high quality agricultural soils, while only a small percentage of the total prime and statewide importance agricultural land in Ventura County, is considered both individually and cumulatively significant.

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31 Ibid, pp. CO-36 to CO-37.

32 Santa Paula General Plan Update EIR, 1998, p. 4.1-1.

33 Ibid, p. 4.1-9.

### ***Cumulative Mitigation Measures***

**Mitigation Measure 5.2-1** has been identified to mitigate the identified impacts. In addition, the following mitigation measure has been identified to mitigate the identified impacts for future projects:

**5.2-2** Development in Adams and Fagan Canyons must incorporate design standards to provide for clustering of development to protect agriculture land.

### ***Residual Impacts***

The loss of prime farmland would be considered cumulatively considerable, and significant and unavoidable.

### **5.2.7 REFERENCES**

The following documents were used in addressing local planning issues:

- City of Santa Paula, General Plan, Conservation and Open Space Element, 1998.
- Ventura County, General Plan, last amended on June 28, 2011.

Additionally, information available from the California Department of Conservation's (DOC) Farmland Mapping and Monitoring project (FMMP) and the Ventura County Local Agency Formation Commission (Ventura LAFCo) were used in the preparation of this section.