

5. Environmental Analysis

5.2 AGRICULTURE AND FORESTRY RESOURCES

This section of the DEIR describes the impacts of the Proposed Project on existing farmland and forestry resources. The information in this section is based on the Adopted Los Angeles County General Plan, the Proposed Project, review of aerial photographs, and review of state farmland maps.

5.2.1 Environmental Setting

5.2.1.1 REGULATORY SETTING

Regulations and plans applicable to the Proposed Project are summarized below.

State

Farmland Mapping and Monitoring Program

The goal of the state Farmland Mapping and Monitoring Program (FMMP) is to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. FMMP produces *Important Farmland Maps*, which are a hybrid of resource quality (soils) and land use information. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. Data is also released in statistical formats—principally the biennial *California Farmland Conversion Report*.

California Land Conservation Act (Williamson Act)

The Williamson Act provides tax incentives to retain prime agricultural land and open space in agricultural use, which subsequently slows its conversion to urban development. The Williamson Act requires a 10-year contract between the County of Los Angeles (County) and landowners who enter into contracts with local government for long-term use restrictions on qualifying agricultural and open space land. In accordance with the contract, the land must be taxed based on its agricultural use rather than its full market value. The overall purpose of the Williamson Act is to protect agricultural lands and open space.

California Land Evaluation Site Assessment Model (LESA)

The California Land Evaluation Site Assessment Model (LESA) was developed by the federal Natural Resources Conservation Service to assist state and local officials with making sound decisions regarding land use. LESA was subsequently adapted by the California Department of Conservation (CDC) for use in California. LESA analyzes soil resource quality, project size, water resource availability, surrounding protected resource lands, and surrounding agricultural lands; the model output is a numerical rating. LESA includes a numeric threshold for determining significance under CEQA of impacts on conversion of mapped farmland to non-agricultural uses.

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Farmland Classifications

The California Department of Conservation, through the FMMP, classifies agricultural lands as follows:

Prime Farmland: Prime Farmland consists of land that has the best combination of physical and chemical features capable of sustaining long-term production of agricultural crops. This land possesses optimal soil quality, growing season, and moisture supply required to produce sustained high yields. Land must have been used for irrigated crop production four years prior to the mapping date.

Farmland of Statewide Importance: Similar to Prime Farmland, this land has a good combination of physical and chemical features capable of sustaining long-term production of agricultural crops. This land has minor shortcomings, such as a decreased ability to store soil moisture and greater slopes in comparison to Prime Farmland. Land must have been used for irrigated crop production four years prior to the mapping date.

Unique Farmland: This land tends to have decreased quality soils used for production of the state's leading agricultural crops. It is generally irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. This land is used for specific, high-economic-value crop production, such as oranges, olives, avocados, rice, grapes, or cut flowers. Land must have been used for crop production four years prior to the mapping date.

Farmland of Local Importance: Each county's board of supervisors, with additional assistance from a local advisory committee, determines important land to the local agricultural economy. The County Board of Supervisors has designated producing lands that would meet the standard criteria for Prime Farmland or Farmland of Statewide Importance, but are not irrigated, as being of "Local Importance."

Grazing Land: This land consists of existing vegetation that is suitable for livestock grazing. This particular category was developed in cooperation with the California Cattlemen's Association, the University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

Urban and Built-Up Land: The land is generally occupied by structures consisting of a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, and sewage treatment and water control structures.

Other Land: This category includes land that is excluded from other mapping categories. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas unsuitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines or borrow pits; and water bodies smaller than 40 acres. Vacant and non-agricultural land greater than 40 acres and surrounded on all sides by urban development is mapped as Other Land.

Land Committed to Non-Agricultural Use: This optional designation is an overlay to the standard farmland categories described above. It represents existing farmland and grazing land, and vacant areas with a permanent commitment for development. Examples of this category include an area undergoing permanent infrastructure installation or for which bonds or assessments have been issued for public utilities. Such lands

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represent planning areas where there are commitments for future nonagricultural development that are not reversible by a city council or board of supervisors' majority vote.

Local

Los Angeles County General Plan

The Los Angeles Countywide General Plan (Adopted General Plan) was adopted in 1980 and established policy to protect agricultural areas in the County, and adopted potential agricultural preserves as Special Management Areas. These areas indicate major contiguous areas where commercial agriculture is taking place and/or is believed to have a future potential based on the presence of prime agricultural soils. The objective is to preserve significant agricultural resource areas and encourage the expansion of agricultural activities into under-utilized lands such as utility rights-of-way and flood prone areas.

Los Angeles County Code Title 22

Chapter 22.24 (Agricultural Zones) of Title 22 outlines the purpose, use restrictions, and general regulation of agricultural uses.

5.2.1.2 EXISTING CONDITIONS

Mapped Important Farmland

Portions of the Project Area that are mapped by FMMP fall into five agricultural land use designations, as shown in Table 5.2-1, *Farmland Mapping and Monitoring Program Categories and Acreages*. The locations of these land classifications are shown in Figure 5.2-1, *State Important Farmland Map*.

Table 5.2-1 Farmland Mapping and Monitoring Program Categories and Acreages

Type of Farmland	Project Area	Total, Los Angeles County (includes incorporated and unincorporated areas)	Project Area as percentage of Los Angeles County Total
Agricultural Land			
Prime Farmland	23,231	36,126	64.3%
Farmland of Statewide Importance	749	1,364	54.9%
Unique Farmland	463	1,372	33.7%
<i>Subtotal, Prime, Statewide, Unique</i>	<i>24,443</i>	<i>38,862</i>	<i>62.9%</i>
Farmland of Local Importance	6,723	10,180	66.0%
Grazing Land	135,342	282,415	47.9%
Subtotal: Local Importance, Grazing	142,065	292,595	48.6%
Subtotal, Agricultural Land	166,508	331,457	50.2%
Non-Agricultural Land			
Urban and Built-Up Land	17,621	45,302	38.9%
Other Land	442,459	827,966	53.4%
Water	575	4,152	13.8%
Subtotal, Nonagricultural Land	460,655	877,420	52.5%
TOTAL	627,163	1,208,877	51.9%

Source: FMMP 2011

Note: The Los Angeles Basin, the San Gabriel Valley, and most of the eastern San Fernando Valley are not mapped by the FMMP.

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Mapped Important Farmland in the Project Area is scattered east, north, and west of the City of Palmdale and City of Lancaster; in addition, much of the unincorporated island in the Palmdale Regional Airport site is Prime Farmland.

Existing Conditions on Mapped Important Farmland

Existing conditions on Prime Farmland, Farmland of Statewide Importance, and Unique Farmland were observed using satellite photography taken by Google in 2013. At a scale of about 1:1500, orchards, row crops, and grass crops can be distinguished; fallow row crop fields can be distinguished from active fields; and vacant land can be distinguished from active farmland and from fallow row crop fields.

Nine areas of Prime Farmland, two areas of Farmland of Statewide Importance, and two areas of Unique Farmland in the Project Area were reviewed. Vacant land was identified in two of the nine areas of Prime Farmland. Both areas of Unique Farmland, and one of the areas of Farmland of Statewide Importance, consisted entirely of active farmland. The remaining farmland areas each consisted of a mixture of active and fallow farmland (see Figure 5.2-2, *Existing Conditions on Important Mapped Farmland*).

Conversion of Farmland to Non-Agricultural Uses

Between 1984 and 2010, the amount of Prime Farmland in Los Angeles County decreased by about 9,200 acres, or 23 percent; and the amount of Farmland of Local Importance decreased by about 12,500 acres, or 65 percent, of the 1984 acreage (see Table 5.2-2, below). During the same period, Farmland of Statewide Importance decreased by 6.4 percent and Unique Farmland increased by 165 percent. The total acreage of Unique Farmland increased incrementally as other land use types were re-designated by the CDC. Overall, Los Angeles County experienced a 6.7 percent decrease in farmland between 1984 and 2010. Farmland conversion data are by county and are not available for the Project Area only.

Table 5.2-2 Conversion of Farmland to Non-Agricultural Uses between 1984 and 2010 in Los Angeles County (in acres)¹

	1984	2010	Change, 1984–2010	Percent Change, 1984–2010
Prime Farmland	40,059	30,876	-9,183	-22.9%
Farmland of Statewide Importance	1,017	952	-65	-6.4%
Unique Farmland	426	1,129	703	165.0%
Subtotal	41,502	32,957	-8,545	-20.6%
Farmland of Local Importance	19,375	6,855	-12,520	-64.6%
Grazing Land	229,763	231,475	1,712	0.7%
Subtotal	249,138	238,330	-10,808	-4.3%
TOTAL	290,640	271,287	-19,353	-6.7%

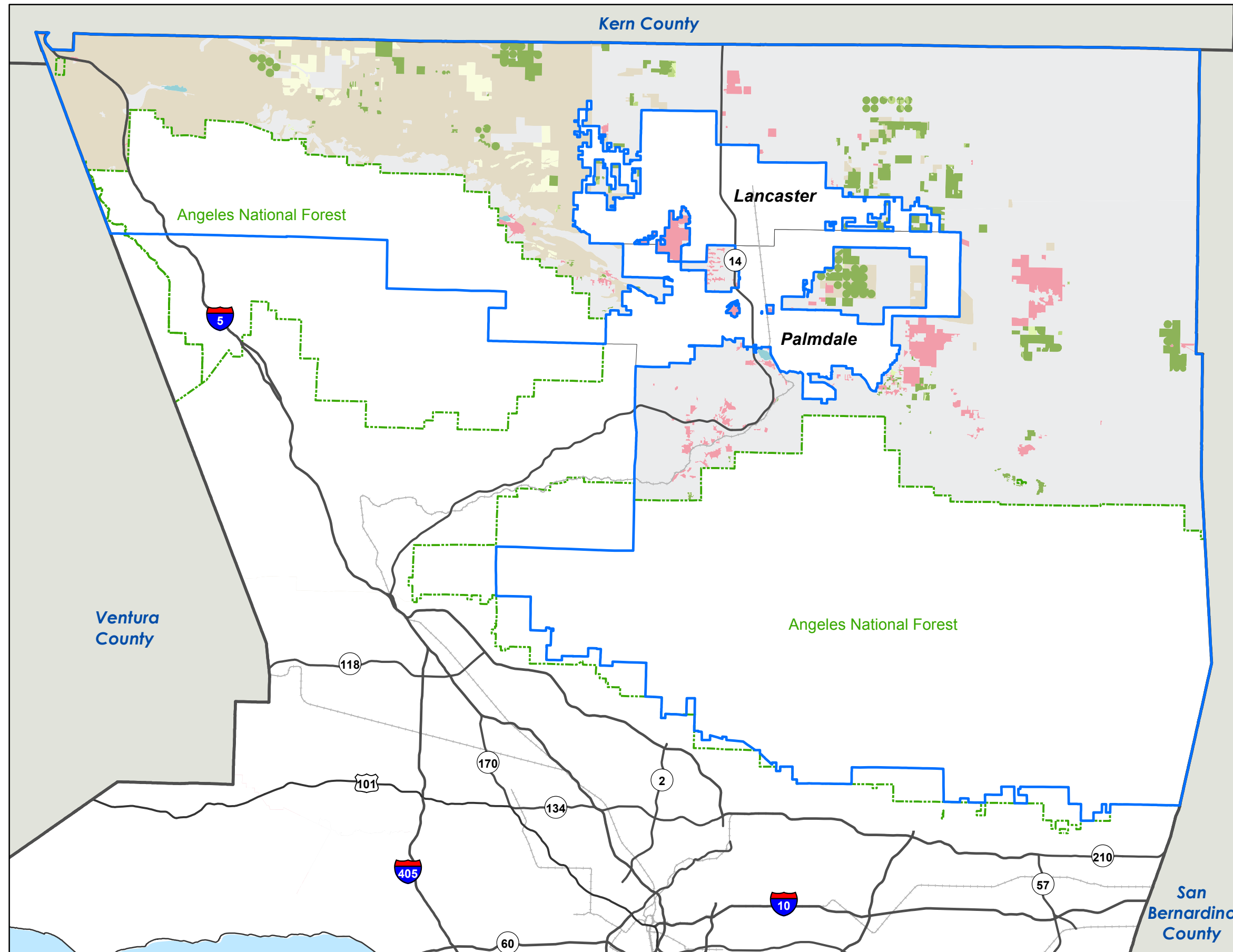
Source: FMMP 2014

¹ Includes all of Los Angeles County, including the Project Area and incorporated cities.

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FIGURE 5.2-1

STATE IMPORTANT FARMLAND MAP



- Antelope Valley Project Area**
- Farm Use Designations**
- P - Prime Farmland
 - F - Farmland of Statewide
 - U - Unique Farmland
 - G - Grazing Land
 - L - Farmland of Local Importance
 - LP - Farmland of Local Potential
 - X - Other Land
 - CI - Confined Animal
 - nv - Nonagricultural or Natural
 - V - Vacant or Disturbed Land
 - R - Rural Residential Land
 - sAC - Semi-agricultural and Rural Commercial
 - D - Urban and Built-Up Land
 - W - Water
 - I - Irrigated Farmland
 - N - Nonirrigated Farmland
 - Z - Out of Survey

ANTELOPE VALLEY
AREA PLAN UPDATE
DRAFT EIR

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PLACEWORKS

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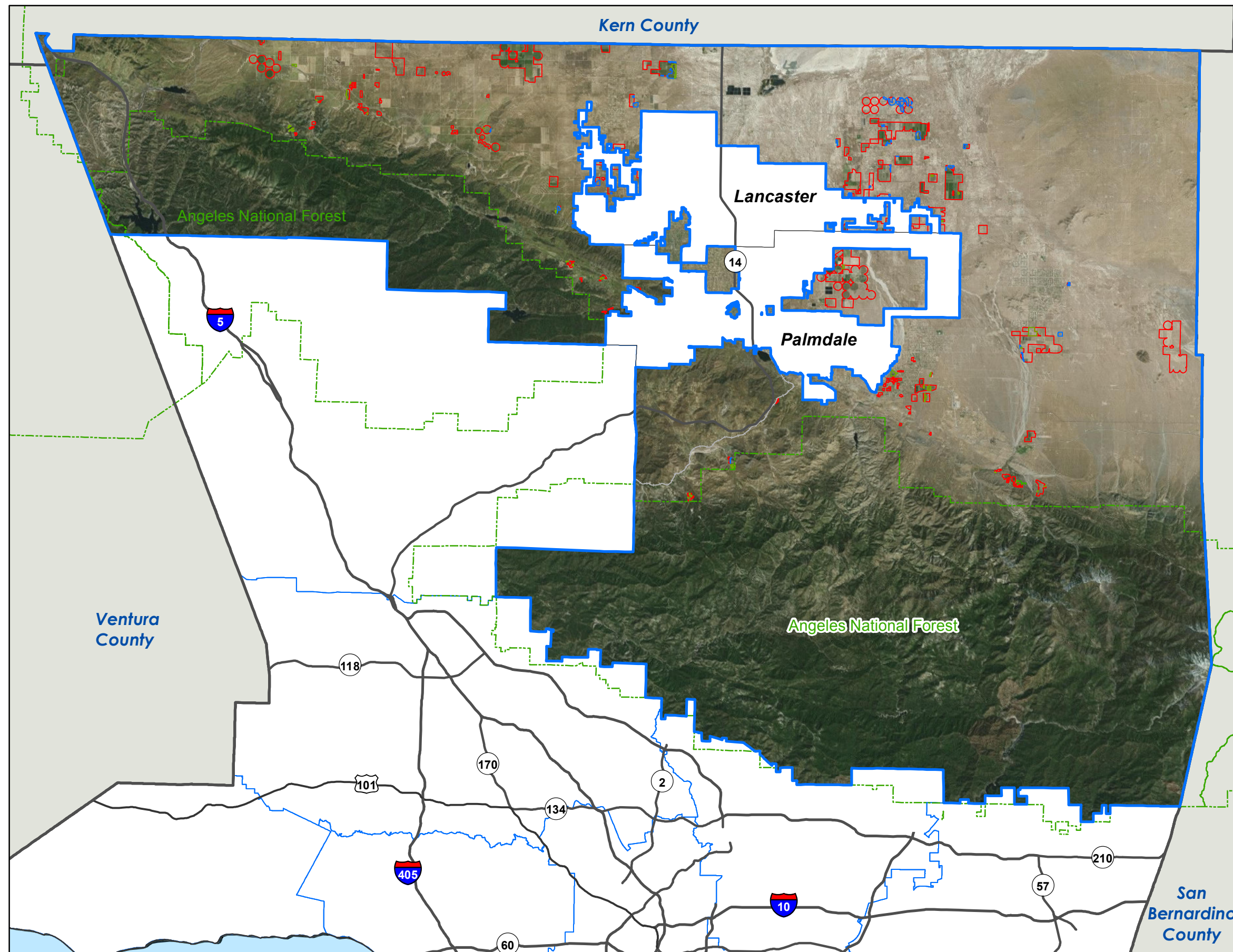
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FIGURE 5.2-2

EXISTING CONDITIONS ON IMPORTANT MAPPED FARMLAND

- Antelope Valley Project Area
- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland



ANTELOPE VALLEY
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Agricultural Production

The total dollar value of agricultural production in Los Angeles County in 2012 was \$189.9 million. The top five agricultural commodities by dollar value in 2012 were nursery production, vegetable crops, field crops, fruit and nut crops, and livestock production. The total acreage in agricultural production was 21,563 acres, or about 33.7 square miles (ACMW 2013). Overall, agricultural production has increased in the Antelope Valley since the mid-1990s due to the increase in production of vegetable crops (mainly onions and carrots) and fruit crops (mainly peaches)—28 percent and 15 percent, respectively. Agricultural acreage of vegetable crops has increased from 9,090 acres in 1999 to 11,670 in 2000, primarily due to increased carrot cultivation (UCCE 2014).

Constraints on Agricultural Production

Constraints on agricultural production in Los Angeles County include conversion of farmland to non-agricultural uses, high land values making some agricultural commodities economically infeasible, incompatibility with surrounding urban land uses, and availability of water.

Forests

Forests are distinguished from woodlands in that the crowns of forest trees generally overlap; woodlands consist of open stands of trees, usually with 25 to 60 percent tree cover (The Nature Conservancy 1998).

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” (California Public Resources Code Section 12220[g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (California Public Resources Code Section 4526).

Forests in the Project Area

A number of forest plant communities in the Project Area are described in the Section 5.4, *Biological Resources*, of this DEIR, with emphasis on oak riparian forest, coast live oak riparian forest, southern cottonwood willow riparian forest, and mainland cherry forest.

The Angeles National Forest (ANF) encompasses nearly 600,000 acres, or 52 percent of land within the Project Area. The ANF stretches across Los Angeles County in two sections encompassing the San Gabriel Mountain Range, and is 1,018 square miles, or 25 percent of the land area of Los Angeles County. The U.S. Forest Service is responsible for managing public forest lands. Its mission is the stewardship of forest lands and resources through programs that provide recreation and multiple uses of natural resources, wilderness areas, and significant habitat areas. Within the boundaries of the National Forest, nearly 40,000 acres are privately owned. For these parcels, commonly referred to as in-holdings, the County retains responsibility for land use regulation. The Project Area also includes small areas of forest outside of the ANF. These consist primarily of small areas in the Sierra Pelona Mountains and areas of the San Gabriel Mountains adjacent to the ANF.

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Despite the large extent of the ANF in the Project Area, very little of its area contains forests or woodlands as defined above. Most of the land area in the ANF is chaparral. Forests in Los Angeles County are limited to narrow formations along creeks and other watercourses and the highest elevations of the San Gabriel Mountains. Because there are no substantial areas of privately-owned forest in Los Angeles County, there is no land used or zoned for commercial logging (timberland).

Forestry Production in Los Angeles County

There is very little forestry production in Los Angeles County; the dollar value of such production was \$16,215 in 2012, the most recent year for which data are available (ACWM 2013).

5.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- AG-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.
- AG-2 Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- AG-3 Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
- AG-4 Result in the loss of forest land or conversion of forest land to nonforest use.
- AG-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 forest land to nonforest use.

5.2.3 Relevant Area Plan Goals and Policies

The following is a list of goals and policies included as part of the Proposed Project intended to reduce potentially significant adverse effects concerning agriculture and forestry resources.

Conservation and Open Space Element

Goal COS 6: Farming is a viable profession for Antelope Valley residents, contributing to the Valley's rural character and economic strength.

- **Policy COS 6.1:** Limit the amount of potential residential development in Agricultural Resource Areas (Map 4.3: Agricultural Resource Areas) through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan, minimizing the potential for future land use conflicts.

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- **Policy COS 6.2:** Limit incompatible non-agricultural uses in Agricultural Resource Areas. Where non-agricultural uses are necessary to meet regional or community needs, require buffering and appropriate development standards to minimize potential conflicts with adjacent agricultural uses.
- **Policy COS 6.3:** Ensure that agricultural activities are included within the Antelope Valley's economic development strategies and pursue funding to support rural economic development and agriculture.
- **Policy COS 6.4:** Encourage the establishment of community farms, community gardens, and similar agricultural operations to produce local food and demonstrate the history, importance, and value of agriculture in the Antelope Valley.
- **Policy COS 6.5:** Encourage the establishment of local farmer markets, roadside stands, wineries and tasting rooms, and other forms of "agricultural tourism" throughout the Antelope Valley to expand potential sources of farm income.
- **Policy COS 6.6:** Provide educational resources to farmers.
- **Policy COS 6.7:** Investigate the feasibility of financial and/or zoning incentive programs for farmers, such as Williamson Act contracts, conservation easements and flexible zoning provisions.
- **Policy COS 6.8:** Support innovative agricultural business practices, such as agricultural tourism and cooperative processing, necessary for adapting to changing economic and environmental conditions by streamlining regulations.

Goal COS 7: Farming practices are sustainable, balancing economic benefits with water and biological resource management priorities, and minimize greenhouse gas emissions and water pollution.

- **Policy COS 7.1:** Promote agricultural uses which sequester carbon and fix nitrogen.
- **Policy COS 7.2:** Support the use of alternative and renewable energy systems in conjunction with agricultural activities.
- **Policy COS 7.3:** Encourage sustainable agricultural and water quality best management practices such as runoff detention basins, use of vegetation filter strips, and organic farming.
- **Policy COS 7.4:** Ensure that agricultural activity is managed to minimize soil erosion and the release of contaminants into surface and groundwater resources.

5.2.4 Environmental Impacts

The following impact analysis addresses thresholds of significance according to Appendix G of the CEQA Guidelines. The applicable thresholds are identified in brackets after the impact statement. In order to provide context for the analysis, the text immediately below identifies components of the Proposed Project

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that directly relate to agricultural resources and explains the relevance of these components to analysis of Impacts 5.1-1 through 5.1-5.

Proposed Project

The Proposed Project devotes special attention to preservation of agricultural resources. Its primary tool for conservation of such resources is the establishment of Agricultural Resource Areas (ARAs).

Agricultural Resource Areas

ARAs are areas where the Proposed Project promotes the preservation of agricultural land. These areas are protected by policies to encourage agriculture and prevent the conversion of farmland to incompatible uses. ARAs consist of farmland identified by the CDC and farms that have received permits from the County Agricultural Commissioner/Weights and Measures. The County encourages the preservation and sustainable utilization of agricultural land, agricultural activities and compatible uses within these areas.

ARAs include:

- Prime Farmland
- Farmland of Statewide Importance
- Farmland of Local Importance
- Unique Farmland
- Lands that received permits from the County Agricultural Commissioner/Weights and Measures

The ARAs exclude:

- Proposed Significant Ecological Areas (SEAs)
- Approved specific plans
- Approved large-scale renewable energy facilities
- Lands designated Public and Semi-Public (P)

ARAs are designated in the Antelope Valley and Santa Clarita Valley areas only; about 98 percent of the ARAs in the County are in the Project Area (see Figure 5.2-3, *Proposed Agricultural Resource Areas*). ARAs in the Project Area are listed below by acreage and farmland mapping category.

- Prime Farmland: 26,917
- Farmland of Statewide Importance: 611
- Unique Farmland: 380
- Farmland of Local Importance: 6,254
- **Total: 34,162**

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Methodology of Analysis

Consistent with Appendix G of the CEQA Guidelines, the analysis in this section of the DEIR focuses on the potential loss of agricultural land or forests.

Approach to Impact Analysis Related to ARAs

Implementation of ARA policies in the Adopted General Plan and Proposed Area Plan would reduce direct and indirect impacts of conversion of mapped Important Farmland to non-agricultural uses. However, ARAs would not be agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. Thus, the following impact analysis focuses on buildout of proposed land use designations in the Project Area.

Feasibility of Agriculture Related to Permitted Density

Agricultural uses are allowed in existing land use designations for rural land, nonurban uses, and mountain land in the Project Area with permitted residential densities of up to one residential unit per acre. This means that agricultural activities are allowed in many areas of Los Angeles County, including on parcels that primarily feature a nonagricultural use. Analysis of impacts to mapped farmland under CEQA focuses on “intensive commercial agriculture” (CDC 1997), which generally involves agricultural operations that produce crops intended for widespread consumption. Especially at the scale of a Proposed Area Plan Update, it is not feasible (and not required under CEQA) to analyze localized impacts to individual subsistence agriculture operations. Therefore, the analysis below focuses on commercial-scale agriculture and assumes that buildout of land use designations with permitted densities greater than one residential unit per five acres would not be compatible with—or likely to be used for—continued agricultural production. Although parcels with designations allowing higher residential units might feature agricultural operations in the short term, buildout of the Proposed Project would feature residential uses on such parcels.

Impact 5.2-1: Buildout of the Proposed Project would convert California resource agency–designated farmland to non-agricultural land uses. [Threshold AG-1]

Impact Analysis:

Buildout of Proposed Land Use Designations on Mapped Important Farmland

Proposed land use designations on Important Farmland under the Proposed Area Plan are listed below in Table 5.2-3 and shown on Figure 5.2-4, *Proposed Land Use Designations on Important Farmland*. Two of the proposed designations, RL10 (Rural Land, one dwelling unit per 10 gross acres) and RL20 (Rural Land, one dwelling unit per 20 gross acres) are considered compatible with continued intensive commercial agriculture. All other land use designations are considered incompatible with continued agricultural use because the designations either permit residential use at one or more dwelling units per five acres; or permit other types of land uses incompatible with agriculture. It is assumed here that all of the mapped Important Farmland in designations incompatible with continued agricultural use would be converted to non-agricultural uses by buildout of the Proposed Area Plan. Such mapped farmland consists of 5,968 acres of Prime Farmland, 133 acres of Farmland of Statewide

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Importance, and 68 acres of Unique Farmland, totaling 6,169 acres; that is, approximately 26 percent of the total of mapped Important Farmland in the Project Area. Farmland that would be converted to non-agricultural use is about 16 percent of the total of 38,862 acres of such farmland countywide (including incorporated and unincorporated areas), such loss of mapped important farmland would be a significant impact.

Implementation of proposed ARA policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to non-agricultural uses. However, ARAs would not be agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. Therefore, conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses due to buildout of the Proposed Project would be a potentially significant impact.

Table 5.2-3 Proposed Land Use Designations on Mapped Important Farmland

	Prime Farmland	Farmland of Statewide Importance	Unique Farmland	Total
Designations for Land Uses Compatible with Continued Agricultural Use				
RL10 – Rural Land 10	9,809	434	294	10,537
RL20 – Rural Land 20	7,063	176	79	7,318
Subtotal	16,872	610	373	17,855
Designations for Land Uses Incompatible with Continued Agricultural Use				
CR – Rural Commercial	120	0	8	128
H2 - Residential 2	3	0	0	3
H5 – Residential 5	101	0	0	101
IH – Heavy Industrial	3	0	0	3
IL – Light Industrial	201	0	21	222
MU-R - Rural Commercial/Mixed Use	13	0	0	13
OS-C – Conservation	83	0	0	83
OS-NF - Open Space National Forest	0	0	0	0
P - Public and Semi-Public	3,696	0	0	3,696
RL1 – Rural Land 1	3	0	0	3
RL2 – Rural Land 2	1,432	105	9	1,546
RL5 – Rural Land 5	312	28	30	370
W - Water	1	0	0	1
Subtotal	5,968	133	68	6,169
GRAND TOTAL	22,839	743	452	24,034

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Impact 5.2-2: The Proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act. [Threshold AG-2]

Impact Analysis:

Proposed Zoning Changes

The Proposed Project includes establishment of two new zones:

- **C-RU Rural Commercial Zone:** would permit low-intensity commercial uses that are compatible with rural, agricultural, and low-density residential uses. The intent of the zone is to serve the diverse economic needs of rural communities, while preserving their unique characters and identities.
- **MXD-RU Mixed Use Rural Zone:** would permit a limited mix of commercial uses and very low-density multifamily residential uses on the same lot within rural town centers

The proposed C-RU and MXD-RU Zones are within the proposed CR (Rural Commercial) and MU-R (Rural Commercial/Mixed Use) designations shown above in Table 5.2-3. Buildout of the Antelope Valley Area Plan would convert land with each of these two zones to nonagricultural uses. Such conversion would be part of the conversion of 128 acres of mapped Important Farmland within the CR designation and of 13 acres within the MU-R designation. There are about 30,566 acres of mapped Important Farmland in the Project Area, including unincorporated and incorporated areas both. The total conversion of 141 acres of mapped Important Farmland to non-agricultural use would be less than significant in comparison to the total acreage of Important Farmland in the Project Area.

Williamson Act Contracts

No Williamson Act contracts are in effect in the Project Area. No impact to Williamson Act contracts would occur.

Impact 5.2-3: The Proposed Project would not conflict with zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. [Threshold AG-3]

Impact Analysis: 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” (California Public Resources Code Section 12220[g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (California Public Resources Code Section 4526). The Los Angeles County Zoning Code does not contain zones specifically for forest use or production of forest resources. Additionally, forest use is not specified as a permitted use in any of the three agricultural zones.

As the County has no existing zoning specifically designating forest use, implementation of the Proposed Project would not conflict with existing zoning for forest land or timberland. No impact would occur.

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Impact 5.2-4: The Proposed Project will not result in the loss of forest land or conversion of forest land to nonforest use. [Threshold AG-4]

Impact Analysis: Forests in the Project Area are largely limited to narrow formations along creeks and other watercourses and the highest elevations of the San Gabriel Mountains. The largest concentration of forest is in the Angeles National Forest (ANF), which covers 25 percent of the land area of Los Angeles County. Despite the large extent of the ANF, very little of its area contains forests or woodlands as defined by the California Public Resources Code. Most of the land area in the ANF is chaparral or similar scrub communities.

Coast live oak riparian forest occurs in narrow formations along watercourses. Southern cottonwood-willow riparian forest occurs in frequently flooded lands along perennially wet reaches of streams (UCSB 1998). These plant communities would be protected by existing regulations, including Sections 1600 et seq. of the California Fish and Game Code.¹ Mitigation measures set forth in Section 5.4 of this DEIR would reduce impacts to these natural communities from projects approved under the Proposed Project.

Oak riparian forest occurs in canyons at higher elevations. Many of the higher-elevation canyons in the Project Area are already protected within the Angeles National Forest. In addition, some oak riparian forest is in riparian habitat jurisdictional to the CDFW.

Forest land within Los Angeles County is protected through the County's Significant Ecological Area (SEA) provisions. Four SEAs, updated from the Adopted General Plan and part of the Proposed Project, are entirely within the Project Area: Antelope Valley, San Andreas, Joshua Tree Woodland, and Tujunga Wash/Hansen Dam SEAs. Four additional SEAs are partly within the Project Area: the Santa Clara River, Altadena Foothills and Arroyos, San Gabriel Canyon, and San Dimas Canyon/San Antonio Wash SEAs (see Figure 5.4-4, *Existing and Proposed Significant Ecological Areas*, in Section 5.4 of this DEIR). Compliance with the provisions for SEAs will reduce potential impacts to forest land to a less than significant level.

¹ California Department of Fish and Wildlife (CDFW) jurisdiction over riparian habitat extends to the edge of riparian habitat extending outward from a stream, pursuant to California Fish and Game Code Sections 1600 et seq.

FIGURE 5.2-3

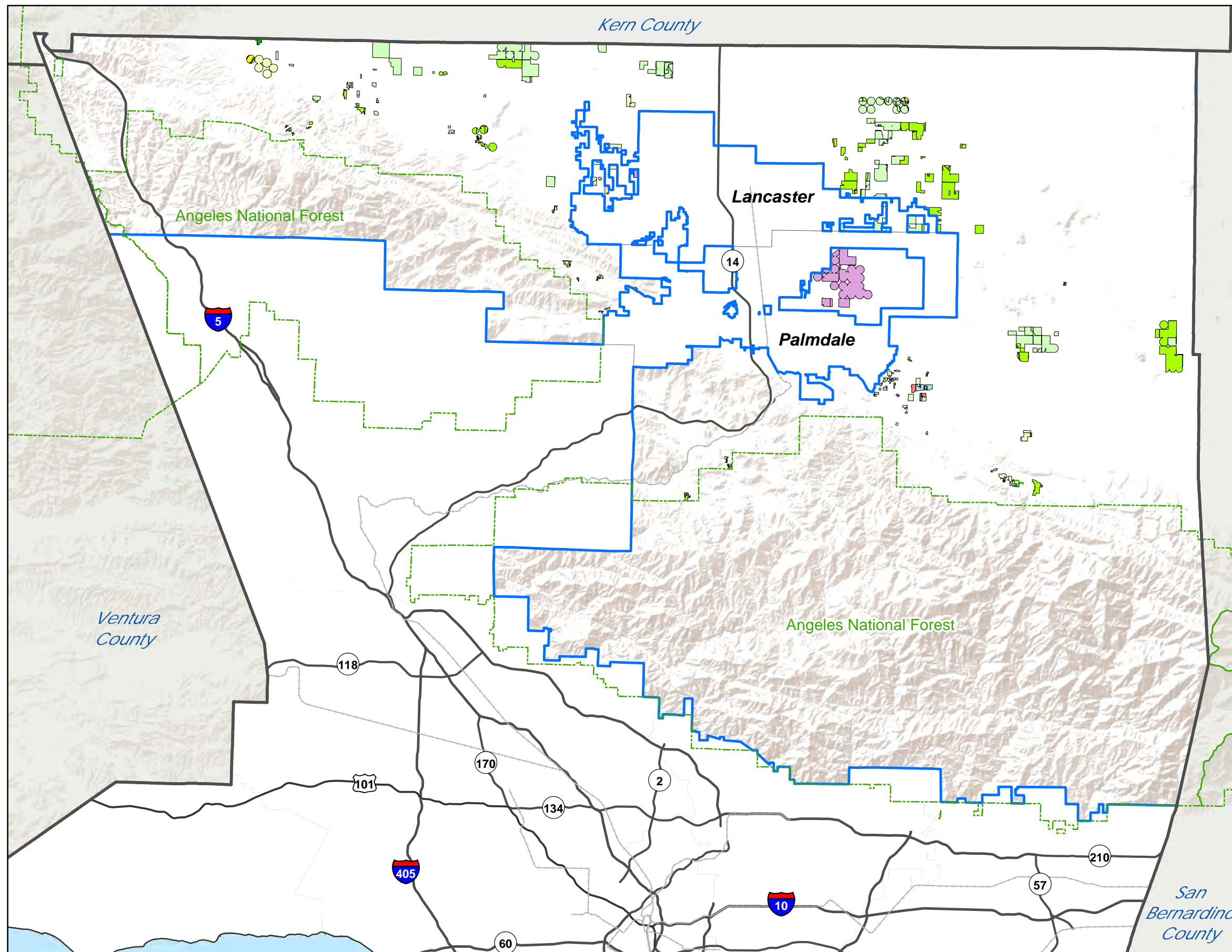
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FIGURE 5.2-4

PROPOSED LAND USE DESIGNATIONS ON MAPPED IMPORTANT FARMLAND

- Antelope Valley Project Area
- RL1 - Rural Land 1 (1 du / 1 gross ac) (1)
- RL2 - Rural Land 2 (1 du / 2 gross ac) (28)
- RL5 - Rural Land 5 (1 du / 5 gross ac) (16)
- RL10 - Rural Land 10 (1 du / 10 gross ac) (105)
- RL20 - Rural Land 20 (1 du / 20 gross ac) (68)
- H2 - Residential 2 (0-2 du / net ac) (1)
- H5 - Residential 5 (0-5 du / net ac) (2)
- CR - Rural Commercial (8)
- MU-R - Mixed Use - Rural (1)
- IL - Light Industrial (4)
- IH - Heavy Industrial (3)
- P - Public and Semi-Public (16)
- OS-NF - Open Space National Forest (1)
- OS-C - Open Space Conservation (2)
- W - Water (2)

ANTELOPE VALLEY
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Impact 5.2-5: Buildout of the Proposed Project would involve other changes in the existing environment that could result in conversion of farmland to non-agricultural use or conversion of forest land to nonforest use. [Threshold AG-5]

Impact Analysis:

Land Use Compatibility

Agricultural use can be incompatible with some other land uses—such as residential, school, hospital, and day care uses—due to pesticide use, noise, dust emissions, and odors. As mapped Important Farmland in the Project Area is generally scattered, buildout of the Proposed Project would involve development of non-agricultural uses along many edges of Important Farmland areas, as well as within some Important Farmland areas. New nonagricultural uses may develop around existing agricultural uses, creating pressure for them to be converted to nonagricultural uses.

Most of the areas of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland within the Project Area are in and surrounded by proposed land use designations incompatible with agricultural use. Thus, buildout of land surrounding existing mapped Important Farmland within the Project Area under the Proposed Area Plan would contribute to pressure to convert mapped farmland to non-agricultural uses.

Water Use

Increasing water demands in a region can reduce the practicability and/or economic feasibility of commercial agriculture. The two foremost sources of water in the Antelope Valley are local groundwater and water imported from Northern California via the State Water Project (SWP). The Antelope Valley–East Kern Water Agency (AVEK), the largest water wholesaler in the Antelope Valley region, purchases imported water and resells it to local water providers. The native safe yield of the Antelope Valley Groundwater Basin is 82,300 acre-feet per year (afy). The SWP water brought in the Antelope Valley results in return flows. The supplemental yield from imported water return flows and the native safe yield of 82,300 provide an average total of 110,000 afy. See Section 5.17 for additional information pertaining to availability of water supplies.

Conversion of Forest Land

Most of the forest land in the Project Area is either along streams or at the highest elevations of the San Gabriel Mountains. Much forest land along streams is protected under California Fish and Game Code Sections 1600 et seq; forest land high in the San Gabriel Mountains is protected as part of the Angeles National Forest. Implementation of the Proposed Project would not indirectly cause conversion of substantial areas of forest land to non-forest uses.

Conclusion

Implementation of proposed ARA policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to incompatible non-agricultural uses. However, ARAs would not be agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. Buildout of the Proposed Project would have a significant indirect impact on conversion

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of mapped Important Farmland to non-agricultural use due to pressure to convert farmland to non-agricultural uses and related incompatibilities between agricultural and urban uses.

5.2.5 Cumulative Impacts

The cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes the Project Area, the unincorporated Santa Clarita Valley, and the cities of Lancaster, Palmdale, and Santa Clarita.

Cities of Lancaster and Palmdale

Cumulative projects in Lancaster and Palmdale could cause significant cumulative impacts if they would convert substantial areas of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to non-agricultural uses. There are about 6,044 acres of Prime Farmland, 31 acres of Farmland of Statewide Importance, and 47 acres of Unique Farmland in the cities of Lancaster and Palmdale. The total of those three categories, 6,123 acres, is about 20 percent of the total in the subregion.

Santa Clarita Valley

A total of 56,836 acres of farmland and grazing land in unincorporated portions of the Santa Clarita Valley Planning Area were mapped by the Division of Land Resource Protection in 2010, including:

- 1,039 acres of Prime Farmland
- 181 acres of Farmland of Statewide Importance
- 264 acres of Unique Farmland
- 130 acres of Farmland of Local Importance
- 55,222 acres of Grazing Land (DLRP 2010).

Important Farmland would be converted to non-agricultural land uses by buildout of the Santa Clarita Valley Area Plan, which is coterminous with the Santa Clarita Valley Planning Area.

The following policies relevant to agricultural resources are set forth in the Santa Clarita Valley Area Plan.

- **Policy LU 1.1.7:** Preserve and protect important agricultural resources, including farmland and grazing land, through designating these areas as Rural Land on the Land Use Map where appropriate.
- **Policy CO 10.1.9:** Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas, and other open space that provides nature carbon sequestration benefits.

The 2012 Certified EIR for the Santa Clarita Valley Area Plan (Impact Sciences, Inc. 2012) concluded that upon implementation of the above policies, impacts related to conversion of agricultural land in the Santa Clarita Valley Planning Area would be less than significant. Because the Proposed Project would not change

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any land use designations in the Santa Clarita Valley Planning Area, this significance determination is incorporated in this DEIR by reference.

Conclusion

Cumulative projects would not conflict with Williamson Act contracts because there are no such contracts in the subregion. Additionally, substantial adverse cumulative impacts to forest land, or zoning for forest use, are unlikely since almost all of the forests are in high-elevation parts of the subregion. However, considering the potentially significant impact to mapped farmland in the Project Area due to future subregional growth, cumulative impacts to agricultural resources would be significant. No mitigation measures are available that would reduce cumulative impacts to less than significant; thus, cumulative impacts would be significant and unavoidable.

5.2.6 Existing Regulations and Standard Conditions

State

- California Government Code Sections 51200 et. seq.: Williamson Act
- California Government Code Section 65570: Authorized Farmland Mapping and Monitoring Program
- California Public Resources Code, Section 21095: Land Evaluation and Site Assessment (LESA) Model
- California Public Resources Code, Section 21060.1: Established farmland mapping categories

Local

- Los Angeles County Code of Ordinances Title 22

5.2.7 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: Impact 5.2-2, Impact 5.2-3, and Impact 5.2-3. Without mitigation, the following impacts would be **potentially significant**:

- **Impact 5.2-1** Buildout of the Proposed Project would convert mapped Important Farmland in the Project Area to non-agricultural uses.
- **Impact 5.2-5** Buildout of the Proposed Project would indirectly result in conversion of mapped Important Farmland to non-agricultural land uses in the Project Area.

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5.2.8 Mitigation Measures

Impact 5.2-1

No mitigation measures are available that would reduce impacts of conversion of mapped Important Farmland to less than significant. Efforts to preserve offsite farmland through agricultural or conservation easements, or mitigation banks, do not offset or decrease the reduction in total mapped Important Farmland due to implementation of a project. The related ARA policies in the Proposed Area Plan (Policies COS 6.1 through COS 6.8) would encourage the continued use of farmland for agricultural operation. However, the ARAs would not be agricultural preserves and would not guarantee the preservation of farmland. Impacts would be significant and unavoidable.

The California Court of Appeal has held that a mitigation measure requiring an agricultural land mitigation bank does not actually avoid or reduce the loss of farmland subject to development (*Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956). Therefore, an Agricultural Land Mitigation Bank is not a valid form of mitigation for farmland conversion impacts. Since then, two other California appellate courts have issued conflicting rulings on whether preservation of offsite farmland mitigates conversion of farmland on a project site to non-agricultural uses. The three rulings are unpublished and are not legal precedents, but do include arguments that might be used in future legislation or court opinions on this topic. One of the rulings, *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) by the Sixth District Appellate Court, found that preservation of offsite farmland does not mitigate conversion of farmland by a project because it does not create new farmland or offset the loss of farmland due to the project. The other ruling, *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) by the Third District Court, disagreed with the earlier two rulings. The last ruling stated that conservation fees can mitigate for the loss of agricultural lands by diminishing development pressures due to the conversion of farmland and reducing the domino effect created by projects. The question of whether offsite preservation of farmland mitigates conversion of farmland to non-agricultural uses has yet to be settled by the courts or the legislature.

As most of Los Angeles County outside the Project Area is 1) urbanized, 2) mountainous terrain unsuitable for intensive commercial agriculture, or 3) land with other constraints that make commercial agriculture infeasible (such as lack of water supply or lack of soil suitability), use of such mitigation would require acquisition of land outside of Los Angeles County. Therefore, mitigation banks and similar programs designed to offset the loss of agricultural land are considered infeasible.

Impact 5.2-5

See explanation for Impact 5.2-1, above. No feasible mitigation measures beyond the goals and policies already incorporated into the Proposed Project are feasible to reduce impacts to farmland that would result from implementation of the Proposed Project.

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5.2.9 Level of Significance After Mitigation

Impact 5.2-1

Buildout of the Proposed Project would convert mapped important farmland in the Project Area to non-agricultural uses. No mitigation measures are available that would reduce the impacts of the conversion of mapped important farmland to less than significant. Efforts to preserve offsite farmland through agricultural or conservation easements, or mitigation banks, do not offset or decrease the reduction in total mapped important farmland due to the implementation of a project. This impact would remain significant and unavoidable.

Impact 5.2-5

Buildout of the Proposed Project would indirectly result in the conversion of mapped important farmland to non-agricultural uses in the Project Area. Although goals and policies have been incorporated into the Proposed Project to protect farming operations from urbanization, these goals and policies cannot ensure that additional conversion of farmland will not occur. This impact would remain significant and unavoidable.

5.2.10 References

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