

4.2 | AGRICULTURAL RESOURCES

INTRODUCTION

This section identifies and evaluates issues related to agricultural resources in the context of the General Plan Planning Area. It includes a description of existing land use conditions in relation to agricultural resources within the Planning Area. A discussion of applicable state, local and regional plans and programs is also included.

EXISTING CONDITIONS

ENVIRONMENTAL BASELINE SETTING

AGRICULTURAL LAND IN THE CITY'S PLANNING AREA

California is the leading agriculture producing state in the nation, and Riverside County is a major contributor with \$1,012,041,000 in agricultural sales in 2007.¹ In 2010, Riverside County had 539,830 acres of agricultural land.² However, Riverside County has long been experiencing land use conversions away from agricultural as the County urbanizes (see Table 4.2-1: Riverside County Agricultural Land Gain and Loss Summary).

As part of Riverside County, the City of Coachella's agricultural lands are a key aspect of the County and City's character. Coachella's multiple field crops result in year-round harvesting. Some examples of these crops include mature date palm groves, citrus groves and vineyards, which are considered of high value from both their annual sales and revenues and from an open space and aesthetic perspective.

¹ United States Department of Agriculture, Census of Agriculture, http://www.agcensus.usda.gov/Publications/2002/County_Profiles/California/index.asp, Accessed May 24, 2010
² California Department of Conservation Important Farmland Monitoring and Mapping Program, Farmland Mapping and Monitoring Program. Accessed May 24, 2013.

Table 4.2-1: Riverside County Agricultural Land Gain and Loss Summary

Land Use Category	2002-2010 Acreage Changes					
	Total Acreage Inventoried		Acres Lost	Acres Gained	Total Acreage Changed	Net Acreage Changed
	2002	2010	(-)	(+)		
Prime Farmland	122,935	119,635	5,655	2,355	8,010	-3,300
Farmland of Statewide Importance	44,653	44,086	1,463	896	2,359	-567
Unique Farmland	37,133	35,391	2,780	1,038	3,818	-1,742
Farmland of Local Importance	229,156	229,877	7,012	7,733	14,745	721
Important Farmland Subtotal	433,877	428,989	16,910	12,022	28,932	-4,888
Grazing Land	111,219	110,841	410	32	442	-378
Agricultural Land Subtotal	545,096	539,830	17,320	12,054	29,374	-5,266
Urban and Built-up Land	315,679	321,553	268	6,142	6,410	5,874
Other Land	1,021,336	1,020,717	3,118	2,499	5,617	-619
Water Area	62,350	62,361	0	11	11	11
TOTAL AREA INVENTORIED	1,944,461	1,944,461	20,706	20,706	41,412	0

Source: Riverside County GIS April 2013 Extraction Date

Preservation of agriculture is considered integral to the City's future. Agricultural land is one of several predominant land uses within Coachella, covering approximately 29 percent (11,139 acres) of the City's Planning Area. Approximately 5,112 acres of the total agricultural land within the Planning Area is located within the City's incorporated area. Most of the agricultural land is located in the unincorporated areas (6,058 acres). Of this agricultural land, much of it is Important Farmland as defined by the State. Table 4.2-2: Existing Agricultural Uses and Figure 4.2-1 summarize the distribution of agricultural lands within the Planning Area.

Table 4.2-2: Existing Agricultural Uses

Land Use	Sphere of Influence	City Limits	Plan Area	Total
	Acres	Acres	Acres	Acres
Agriculture	3,450	4,881	334	8,665
Agriculture, Preserve	823	127	44	994
Agriculture, Preserve with a notice of non-renewal	1,361	77	42	1,480
Total	5,634	5,112	424	11,170

Source: Riverside County GIS April 2013 Extraction Date

FARMLAND OF LOCAL IMPORTANCE

Farmland of Local Importance is land of importance to the local agricultural economy, as defined by each County’s Board of Supervisors and a local advisory committee. Designated Farmland of Local Importance in Riverside County includes the following:

- Soils that would be classified as Prime and Statewide, but lack available irrigation water. Lands planted to dry land crops of barley, oats, and wheat.
- Lands producing major crops for Riverside County, but that are not listed as unique crops. These crops are identified as returning one million or more dollars on the 1980 Riverside County Agriculture Crop Report. Crops identified are permanent pasture (irrigated), summer squash, okra, eggplant, radishes, and watermelons.
- Dairy lands, including corrals, pasture, milking facilities, and hay and manure storage areas if accompanied with permanent pasture or hay land of 10 acres or more.
- Lands identified by City or County ordinance as Agricultural Zones or Contracts, including Riverside City “Proposition R” lands. Lands planted to jojoba, which are under cultivation and are of producing age.

Designated lands summarized in Table 4.2-3: Important Farmland in Coachella and are shown in Figure 4.2-1: Important Farmland in Coachella.

Table 4.2-3: Important Farmland in Coachella

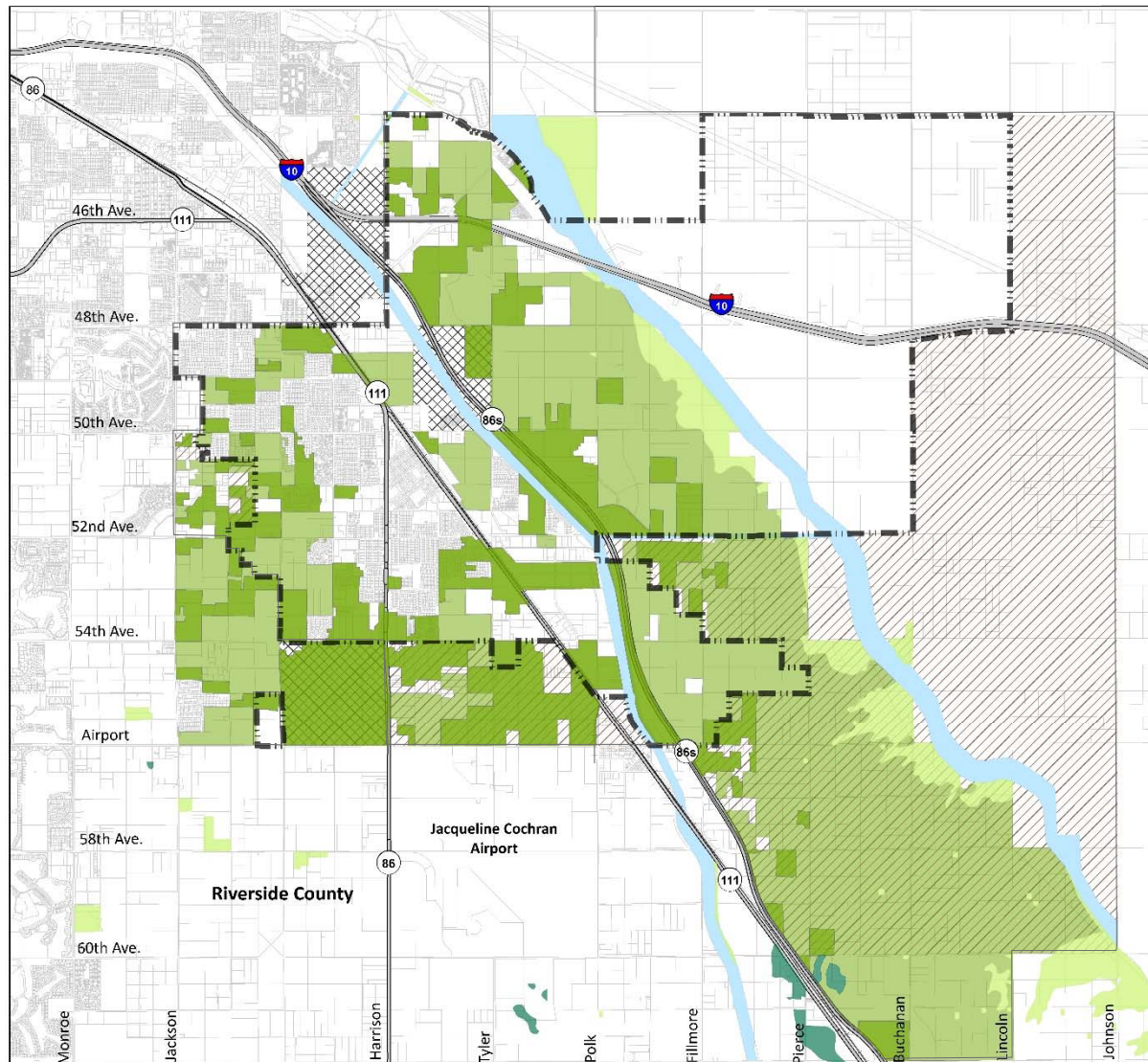
	Sphere of Influence	City Limits	Planning Area	Total
Farmland Type	Acres	Acres	Acres	Acres
Urban-Built Up Land	284	2,587	135	3,006
Prime Farmland	240	1,358	16	1,614
Unique Farmland	477	313	251	1,041
Other Lands	246	128	99	473
Local Importance	1,246	2,288	7	3,541
Statewide Importance	0	0	34	34
Total	2,493	6,674	542	9,709

Source: Riverside County GIS April 2013 Extraction Date

WILLIAMSON ACT LANDS

Review of agricultural maps indicates that there are 994 acres of agricultural land covered by Williamson Act contracts within the Coachella Planning Area and 1,480 acres of agricultural land covered by Williamson Act contracts that have filed for non-renewal. Table 4.2-2: Existing Agricultural Uses summarizes the agricultural lands within the Planning Area that are and are not covered by Williamson Act contracts. General information about the Williamson Act can be found on page 4.2-7.

Figure 4.2-1: Important Farmland in Coachella



City of Coachella
General Plan Update 2035

Important Farmland

Legend

- Coachella City Limits
- Farmland of Statewide Importance
- Farmland of Local Importance
- Prime Farmland
- Unique Farmland
- Sphere of Influence
- Tribal Land
- General Plan Planning Area

*Prime Farmland is defined by Farmland Mapping & Monitoring Program and meets criteria for soil and water quality. Prime Farmland is defined by the Williamson Act.

* Farmland of Local Importance is land of importance to the local economy, as defined by each county's local advisory committee and adopted by its Board of Supervisors. It does not meet the criteria of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. (Source: California Department of Conservation)



Source: City of Coachella and Riverside County
Date: August 2012

REGULATORY FRAMEWORK

FEDERAL

USDA Census of Agriculture

Every five years, the U.S. Department of Agriculture (USDA) performs a Census of Agriculture, which is a comprehensive survey of farming within the United States. The Census looks at land use and ownership, operator characteristics, production practices, income and expenditures and many other areas. Census data is used by federal, state, and local governments, agribusinesses, trade associations, and those who serve farmers and rural communities.

Agricultural Soil Classification

The USDA Natural Resources Conservation Service uses the Land Capability Classification system to determine a soil's agricultural productivity. This system indicates the absence of soil limitations, which, if present, would require the application of management techniques (e.g., drainage, leveling, special fertilizing practices) to enhance production. Capability classes range from Class I soils, which have few limitations for agriculture, to Class VII soils, which are unsuitable for agriculture (see Table 4.2-4: Land Capability Classification). Generally, as the ratings of the capability classification system increase, crop yields and profits are more difficult to obtain. The soil types present with the City of Coachella are listed and discussed in Section 2.6 of this report. There the characteristics of each soil are discussed and their Class identified.

Table 4.2-4: Land Capability Classification

Classification	Description
Class I	Soils have few limitations that restrict their use.
Class II	Soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.
Class III	Soils have severe limitations that reduce the choice of plants that require special conservation practices or both.
Class IV	Soils have very severe limitations that reduce the choice of plants that require very careful management or both.
Class V	Soils are not likely to erode but have other limitations impractical to remove that limit their use largely to pasture range woodland or wildlife habitat.
Class VI	Soils have severe limitations that make them generally unsuitable for cultivation and that limit their use largely to pasture or range woodland or wildlife habitat.
Class VII	Soils have very severe limitations that make them unsuitable for cultivation and that limit their use largely to pasture or range woodland or wildlife habitat.

SOURCE: USDA, 1985

STATE

State of California Department of Conservation Farmland Classification System

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established in 1982 in response to a critical need for assessing the location and quantity of agricultural lands and conversion of these lands. The mapping program is a non-regulatory program and provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The mapping program provides land use conversion information for decision makers to use in planning for present and future agricultural land resources throughout the State.

Using Soil Conservation Service soil classifications, discussed above, the California Department of Conservation and the California Association of Resource Conservation Districts translate modern soil survey data into Important Farmland Maps for the state's agricultural counties. The initial mapping year was 1984. The first Farmland Conversion Report was released in 1988 and detailed farmland changes from 1984 to 1986. The Important Farmland Maps and Farmland Conversion Report are updated biennially. This classification system focuses only on those lands that have been recently farmed. Land not recently farmed does not show up on the Important Farmland Maps. The Department, in its Farmland Conversion Report published in June 1994, clarified the way unfarmed agricultural lands are removed from their Important Farmland Maps. Before removing unfarmed land from the maps, the Department of Conservation now waits two mapping cycles (4 years) rather than one, to make the Department's data more meaningful.

The Important Farmland Maps and the Advisory Guidelines for the Farmland Mapping and Monitoring Program identify five agriculture-related categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Each is described below in Table 4.2-5. The minimum mapping unit for each category is 10 acres, unless otherwise noted.

Table 4.2-5: Farmland Classification System

Designation	Description
Prime Farmland	Prime Farmland is farmland with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date.
Farmland of Statewide Importance	Farmland of Statewide Importance is farmland similar to Prime Farmland, but with minor shortcomings, such as greater slopes or with less ability to store soil moisture. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date.
Unique Farmland	Unique Farmland is 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. The land must have been cropped at some time during the two update cycles prior to the mapping date.
Farmland of Local Importance	Farmlands not covered by the categories of Prime, Statewide, or Unique. They include lands zoned for agriculture by County Ordinance and the California Land Conservation Act as well as dry farmed lands, irrigated pasture lands, and other agricultural lands of significant economic importance to the County and include lands that have a potential for irrigation from local water suppliers.
Grazing Land	Grazing Land is land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for this category is 40 acres.
Other Land	Other Land is land not included in any other mapping category. This land generally includes rural development of low building density; brush, timber, wetland, and riparian areas not suitable for livestock grazing; vacant and nonagricultural land surrounded on all sides by urban development; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; water bodies smaller than 40 acres; a variety of other rural land uses.

SOURCE: California Farmland Mapping and Monitoring Program, 2008

The California Land Conservation Act of 1965 (The Williamson Act)

The California Land Conservation Act, also known as the Williamson Act, was adopted in 1965 in order to encourage the preservation of the State's agricultural lands and to prevent its premature conversion to urban uses. The Act creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict land to agricultural and open-space uses. Under the Williamson Act, an agricultural preserve must consist of no less than 100 acres, any development on the property must be related to the primary use of the land for agricultural purposes, and development must be in compliance with local uniform rules or ordinances. Williamson Act contracts are estimated to save agricultural landowners from 20 to 75 percent in property taxes each year.

The vehicle for these agreements is a rolling-term, 10-year contract (i.e., unless either party files a "notice of nonrenewal," the contract is automatically renewed annually for an additional year). In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value (California Department of Conservation, 2006). If a "notice of nonrenewal" is filed by a landowner, a nine-year nonrenewal period commences. Over this period of time, the annual tax assessment gradually increases. At the end of the nine-year nonrenewal period, the contract is terminated.

Only the landowner can petition to cancel a Williamson Act contract. To approve a tentative contract cancellation, a county or city must make specific findings that are supported by substantial evidence. The existence of an opportunity for another use of the property is not sufficient reason for cancellation. In addition, the uneconomic character of an existing agricultural use shall not, by itself, be a sufficient reason to cancel a contract (California Department of Conservation, 2004). The Williamson Act requires that a cancellation fee be applied to properties that terminate their encumbered contract status early. This cancellation fee is equal to 12.5 percent of the full market value of the property without encumbered status.

LOCAL

Local Area Formation Commission Agricultural Mitigation Policies

Local Area Formation Commissions (LAFCO) regulates boundary changes proposed within a county³ by other public agencies or individuals. The Riverside County LAFCO promotes the wise use of land resources while providing an orderly growth pattern for the existing and future needs of a community within Riverside County (LAFCP, 2008). It also ensures the establishment of an appropriate and logical municipal government structure for the distribution of efficient and appropriate public services.

The Riverside LAFCO must review and approve any proposal to add land to a city or special district (annexations), create a new city or special district (incorporation or formation), remove land from a city or special district (detachment), consolidate, merge, or dissolve cities or special district. However, it does not have the power to initiate boundary changes on their own, except for proposals involving the dissolution or consolidation of special districts and the merging of subsidiary districts. Additionally, the LAFCO is not a county agency. It is an independent regulatory commission operating at the county level that receives its powers directly from the State Legislature.

³ County boundaries often include the county sphere of influence.

Riverside County LAFCO's Objective No. 2, as stated in its policies and procedures, is to preserve the physical and economic integrity of agricultural lands. The policies written under this objective are stated below (LAFCO, 2004):

Objective No. 2: Preserve the physical and economic integrity of agricultural lands.

1.2.1 City Spheres of Influence shall be directed away from substantial areas of prime agricultural land, unless:

- A. The result would not facilitate an orderly development pattern; and,
- B. The city's general plan allows for the continued operation of agricultural uses and provides guidelines for the ultimate development of agricultural land at the time the use is terminated or development is proposed.

1.2.2 LAFCO shall deny the annexation of agricultural lands unless they meet the criteria specified below:

- A. The annexation of land located within an agricultural preserve may be approved only when:
 1. A notice of non-renewal or cancellation has been filed on the affected property proposed for annexation, or,
 2. The jurisdiction's general plan contains appropriate language:
 - a. To allow for the effective and continued operation of agricultural uses, and;
 - b. To provide guidelines for the ultimate development of agricultural land at the time the preserve is terminated or development is proposed.
- B. The loss of non-prime agricultural lands should not be a central issue for annexation where city or county general plans provide for urban development and the proposal would not impact the integrity of surrounding prime agricultural lands.

ENVIRONMENTAL IMPACTS AND MITIGATION

SIGNIFICANCE CRITERIA

The subsequent analysis presented in this chapter follows the questions used in the Initial Study as presented by the CEQA checklist contained in Appendix G. Impacts related to agricultural resources are considered significant if a project 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 conflict with a Williamson Act contract; or
- Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

CONVERSION OF FARMLAND TO NON-AGRICULTURAL USE

Impact 4.2-1: Would the Project 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?

Significance: Significant and Unavoidable.

Direct impacts to farmland include the removal of farmland for production through the development of non-agricultural uses on that land. The State defines this impact through the CEQA Guidelines Appendix G, which states that the conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program, to non-agricultural uses is a significant impact.

Implementation of the proposed project would result in the conversion of 9,862 acres of farmland to urbanized uses. Of this acreage, 5,662 acres of Prime Farmland would be converted, 3,613 acres of Farmland of Local Importance would be converted, 587 acres of Unique Farmland would be converted, and 3,613 acres of Farmland of Local importance would be converted. Table 4.2-6, Acres of Important Farmland Converted, below details the conversion of farmland.

Table 4.2-6: Acres of Farmland Converted

Sub Area	Impacted Acres			Grand Total
	Prime Farmland	Local Importance	Unique Farmland	
1	425	828	0	1,253
2	0	0	0	0
3	188	128	0	317
4	0	48	0	48
5	357	828	0	1,185
6	162	18	0	180
7	13	249	0	262
8	570	258	0	828
9	1,187	586	196	1,969
10	145	0	0	145
11	916	380	114	1,410
12	285	163	0	449
13	0	0	0	0
14	0	0	0	0
15	1,412	126	278	1,816
16	0	0	0	0
17	0	0	0	0
Grand Total	5,662	3,613	587	9,862

The presentation of agriculture is important to the community and policy makers in Coachella. As such, the land use plan (Figure 3-23 of the General Plan) sets aside subarea 16 for Agricultural Rancho specifically for maintain agricultural operations. Additionally, the land use plan sets aside land in subareas 15 and 17 for Rural Rancho, which allows for small-scale agriculture. Finally, as showing in table 3-1: General Plan Designations Compatibility Uses, in the Public Draft General Plan, interim agricultural uses are permitted as secondary uses in Suburban Neighborhood areas.

Additionally, to address the extensive conversion of agricultural resources under the proposed CGPU, a comprehensive policy program has been developed. The CGPU addresses agricultural resources in numerous policies in the Land Use + Community Character Element:

- 2.12 High priority development areas.** Identify subareas 5, 6, 7, 8, 9, 10, and 11 as Priority Growth Areas to be targeted for growth through City policies and actions and shall receive priority for funding, community facilities and services.
- 2.13 Growth expansion areas.** Identify subareas 12 and 14 as future Growth Expansion Areas. During the time horizon of the General Plan, growth that occurs in these areas shall conform to the following criteria and characteristics.
- Minimum size of proposed development projects must be over 100 acres
 - Residential areas must be developed as one or more complete neighborhoods that contain a mix of housing types, sufficient parks and open spaces, necessary community facilities and services with access to retail and other goods and services.
 - Development must be connected to the existing City via a network of multi-modal streets and non-motorized trails.
 - All infrastructure connecting the new development to the existing City must be paid by the project sponsor using the City's infrastructure specifications.
 - Financing plans for on-going operation and maintenance of streets, roads, parks and other community facilities and services that do not increase taxes or reduce services for existing residents must be approved and in place.
- 2.14 Reserve development areas.** Subareas 15 and 16 shall be maintained as reserve development areas. These areas shall maintain their current land or agricultural use until the identified Growth Expansion Areas are at least 60 percent developed with urban uses or preserved open spaces.
- 2.18 Open space conservation.** Establish mechanisms to provide for the conservation of resource land that is not yet conserved if it falls within one of the following categories:
- Flood plain, including Special Flood Hazard Areas.
 - Open Space to be acquired.
 - Wildlife corridors.
 - Legacy farmland.
 - Riparian areas.
 - Areas of cultural significance.
 - Seismic or geological hazard areas.
 - Legacy viewsheds.

Goals 4. Rural Areas. A strong, preserved rural and agricultural heritage and character that preserves the natural beauty and context of the City.

- 4.1 Agricultural land preservation.** Provide for the protection and preservation of agricultural land as a major industry for Coachella and sufficient to maintain the rural character of the City. Explore and allow a variety of methods of preserving land in sizes that are viable economic units for continuing agricultural activities including:
- Density transfers to allow a greater portion of proposed development on other in order to allow productive sites to remain in agricultural production.
 - Use of the Williamson Act.
 - Implementation of a “right-to-farm” ordinance.
 - Adopting a farmland protection program.
- 4.2 Agricultural land conversion.** Actively discourage the urbanization of agricultural land when other land not in agricultural use within the city limits is available for development.
- 4.3 Agricultural elements in urban landscape.** Where feasible, incorporate existing agricultural elements, such as date farms, vineyards and citrus trees into the urban landscape as part of development projects. This preservation will enable the agricultural history of the City to remain visible and provide unique urban landscape features that can distinguish Coachella from other cities in the Coachella Valley.
- 4.4 Agricultural land in sphere of influence.** Preserve existing agricultural land in the Sphere of Influence and limit the annexation of active agricultural land, unless it is part of a development project.
- 4.5 Rural residential.** Allow rural residential with homes on lots of up to 2.5 acres in size in limited areas of the City. These areas shall serve as buffers between more urban development and permanently undeveloped areas of the City. The Rural areas may serve as part of the City’s greenbelt.
- 4.6 Conservation subdivisions.** Provide for, and encourage, conservation subdivisions that cluster development on a site as a way of preserving valuable natural resources such as agricultural lands.
- 4.7 City Greenbelt.** Strive to create an undeveloped or rural greenbelt around the City comprised of rural residential, preserved parks and open space, and agricultural lands.

Additionally, policy 12.3 under Goal 12, Diversity of uses for economic development, also addresses the important of maintaining agriculture:

- 12.3 Agriculture.** Recognize and maintain agriculture and related uses as a key component of the City’s long-term economic development strategy. Prioritize the preservation of date groves, citrus groves and vineyards.

The CGPU also addresses agricultural resources in numerous policies with the Sustainability + Natural Resources Element:

Goal 10. Agricultural Preservation. Viable, productive local agricultural lands and industry.

- 10.1 **Prime agricultural land.** Prioritize the conservation of state-designated Important Farmlands and discourage the conversion of these lands to urbanized uses until such time as the land is needed for additional growth.
- 10.2 **Agricultural economy.** Maintain and support a viable agricultural economy within the City that recognizes the community's agricultural heritage.
- 10.3 **Agriculture preservation.** Continue to work with landowners in maintaining and extending existing Williamson Act contracts.
- 10.4 **Preservation tools.** Preserve agriculturally important lands through conservation subdivisions, conservation easements and the transfer of development rights.
- 10.5 **Water-efficient agriculture.** Promote crops and methods that require limited or no irrigation.
- 10.6 **Habitat restoration.** Allow unviable and abandoned farmland to revert to desert, habitat area and open space, especially in areas contiguous to existing habitat and desert.
- 10.7 **Accessory uses.** Consider allowing accessory uses that are complimentary to agricultural production to improve the financial viability of agricultural land.
- 10.8 **Buffers between agriculture and urban uses.** Require new developments, whether they are new urban or new agricultural uses, in which urban and agriculture uses would be adjacent to maintain a protective buffer that ensures land use conflicts do not occur.
- 10.9 **Right to Farm.** Support the right of existing farms to continue operations.
- 10.10 **Preservation of slow-growing trees and crops.** Encourage the preservation of date groves, citrus orchards, vineyards and other crops which require substantial growth before achieving mature production rates.
- 10.11 **Farm worker housing.** Encourage the producers of agricultural products to provide suitable housing for farm laborers that meets applicable health and safety standards.
- 10.12 **Market transformation.** If the agri-business industry declines in Coachella, support efforts that facilitate the transition of uses, businesses and employees from agriculture to other sectors of the local economy.
- 10.13 **Voluntary conservation.** Support private conservation organizations that utilize voluntary conservation easements as a tool for agricultural land conservation to accomplish preservation of agricultural lands and continued agricultural operations.

In addition to these supporting policies, existing regulatory framework as described in the Existing Conditions Section, is in place to protect and ensure that agriculture land of significant importance, including the LAFCO agricultural regulation and monitoring of agriculture lands in and around the Planning Area.

Finally, the City's approach to development as proposed by the CGPU (as described by policies 2.12, 2.13, and 2.14 and Figure 3-23: Land Use Plan Map of the Draft General Plan) would help reduce the impact to agricultural resources by focusing new development in High Priority Development Areas and Growth Expansion Areas, and prohibiting or limiting development of land in Subareas 15, 16, and contain agricultural resources, until the growth areas are at least 60% developed. If the CGPU is implemented as proposed, all of the growth anticipated to occur in Coachella by 2035 could be accommodated without any development in Subarea 16. This would result in the conservation of 3,600 acres of land in Subarea 16, 3508 of which is agricultural land, for at least 22 years.

While the CGPU proposes a comprehensive agricultural conservation program that provides multiple avenues to protect agricultural resources and agricultural operations, conversion of agricultural resources would still occur under the CGPU. This would occur because much of the existing agricultural lands within the Planning Area are planned for future urban uses and the conversion from agricultural uses will occur despite the General Plan policies that are intended to preserve ongoing agricultural activities. It is not the intent of the CGPU to preserve all agricultural activities within the City, but to manage the transition from agricultural uses in a way so as not to prematurely or unnecessarily accelerate the conversion of agricultural land to urban uses. With implementation of the proposed project, 5,662 acres of Prime Farmland, 587 acres of Unique Farmland, and 3,613 acres of Farmland of Local Importance would be converted to urban uses.

The conversion of farmland to urban uses would be a significant unavoidable impact. Converting these resources to urban uses would permanently alter or eliminate agricultural resources, permanently eliminating a source of food and fiber. These resources cannot be recreated somewhere else. With respect to agricultural mitigation, avoidance of development is largely the most effective way of addressing the environmental impact. This Project has been proposed to plan for the orderly growth of the City of Coachella, to ensure the City can accommodate the expected growth of 94,000 people in a healthy, sustainable manner. Complete avoidance of development on agriculture lands would not be possible with the growth of 94,000 more residents. As such, the impact related to the conversion of farmland to non-agricultural use would be a significant unavoidable impact. As discussed in Section 3.0, the project is still being proposed despite these significant unavoidable impacts because the City of Coachella must plan for and accommodate the growth that is projected in the Coachella Valley over the next 20 years.

Mitigation Measures

No mitigation measures are feasible. Preventing or mitigating impacts to agricultural resources largely centers around the avoidance of impacts by preventing the conversion of agricultural land to non-agricultural uses. The City of Coachella is expecting growth of more than 94,000 new residents over the next 20 years and the Coachella Valley will grow by nearly 500,000 new residents. The City of Coachella does not have the financial means or the political support to purchase all of the threatened agricultural lands in Coachella in order to prevent conversion to urban uses. Additionally, the City cannot accommodate this growth and avoid impacts to agriculture land simply because there is not enough non-agriculture land in the City. Instead, the CGPU presents a strategy of managing the transition from agricultural to urban uses through focused growth areas, market support, and land use controls with the intent of preventing the premature conversion of agricultural lands.

Conflict with Existing Zoning for Agricultural Use or Williamson Act Contracts

Impact 4.2-2: Would the Project conflict with existing zoning for agricultural use, or conflict with a Williamson Act contract?

Significance: Significant and Unavoidable.

One of the State significance criteria identifies conflicts with existing zoning for agricultural use (refer to Section 4.8, *Land Use and Planning* for additional discussion on conflicts existing zoning) or with Williamson Act contracts as a significant impact.

Within the Planning Area, there are approximately 11,139 acres of agricultural land. Approximately 994 acres of this land are currently under a Williamson Act contract. Approximately 1,480 additional acres of land are under Williamson Act contracts that have not been renewed and are set to expire. Except for the agricultural operations in Subarea 16, most of these agricultural lands are expected to be developed with urban uses by 2035. Additionally, much of this land is currently zoned as Agricultural, Agricultural Reserve, or Agricultural Transition. Under the proposed CGPU, these lands would be designated with urban uses and would be rezoned to urban uses with the update of the City's Zoning Code. California law requires that the Zoning Code be revised to reflect the adopted General Plan within a reasonable time period, which is typically one year. In order to comply with state law, the City expects to update the Zoning Code within one year of the adoption of the General Plan and has already initiated the first steps of that process. As such, the proposed project would result in a direct, temporary conflict with existing zoning for agricultural uses for those lands that are designated for urban uses, but this conflict would be resolved when the Zoning Code is updated. There would also be a direct impact resulting from the conflict between the urban designations of the General Plan and those lands currently under Williamson Act contracts.

As discussed under Impact 4.2-1, the proposed CGPU presents numerous goals and policies that would help to minimize impacts to agricultural resources.

Finally, the City's approach to development as proposed by the CGPU would help reduce the impact to agricultural resources by focusing new development in High Priority Development Areas and Growth Expansion Areas, and prohibiting development of land in Subareas 15, 16, of which Subareas 15, and 16 contain agricultural resources, until the growth areas are at least 60% developed. If the CGPU is implemented as proposed, all of the growth anticipated to occur in Coachella by 2035 could be accommodated without any development in Subarea 16. This would result in the conservation of 3,600 acres of land, most of which is agricultural land and some of which is covered by Williamson Act contracts, for at least 22 years.

While the General Plan provides extensive policy direction that helps minimize the impacts to agricultural resources, because the loss of these agricultural resources cannot be reversed once urban development occurs, this impact is considered to be significant and unavoidable.

Mitigation Measures

No mitigation measures are feasible. Preventing or mitigating impacts to agricultural resources largely centers around the avoidance of impacts by preventing the conversion of agricultural land to non-agricultural uses. The City of Coachella is expecting growth of more than 94,000 new residents over the next 20 years and the Coachella Valley will grow by nearly 500,000 new residents. The City of Coachella does not have the financial means or the political support to purchase all of the threatened agricultural lands in Coachella in order to prevent conversion to urban uses. Additionally, the City

cannot accommodate this growth and avoid impacts to agriculture land simply because there is not enough non-agriculture land in the City. Instead, the CGPU presents a strategy of managing the transition from agricultural to urban uses through focused growth areas, market support, and land use controls with the intent of preventing the premature conversion of agricultural lands.

INDIRECT IMPACTS OR CONVERSION OF FARMLAND

Impact 4.2-3: Would the Project involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses?

Significance: Less than significant.

Through the CEQA Guidelines, the State has identified that potential indirect impacts to farmland is an environmental issue worthy of consideration under CEQA. Generally, indirect impacts to farmland are those impacts that might result in changes to the environment that would subsequently make productive farming more difficult, such as impacting a water source that an agricultural operation depends upon. The CEQA Guidelines loosely identify these impacts as those that would involve other changes in the existing environment that, due to their location or nature, could result in conversion of farmland, to non-agricultural use.

Urban development adjacent to farmland can have several negative impacts on continued farm operations. Direct physical impacts include vandalism to farm equipment or fencing and theft of fruits and vegetables. Soil compaction from trespassers or equestrians can also damage crop potential. These can result in indirect economic impacts. Decreased air quality from adjacent urban development can also result in impacts to adjacent farmland. One study showed that crop production in the first two rows adjacent to urban uses is about 20% lower than the rows beyond (Ventura County Agricultural Land Trust, 1996). Conflicts between farm vehicles and high-speed automobiles used by residents on adjacent roadways can lead to accidents. Other indirect impacts to agriculture from nearby urban uses can affect the long-term viability of such operations. Increased regulations and liability insurance to protect the farmer from adjacent urban uses cost time and money. Some farmer's sensitive to nearby residences voluntarily limit their hours of operation and do not intensively use the portions of their property closest to urban uses, in effect establishing informal buffer zones on their own property. This has the effect of lowering the crop yield, and therefore the long-term economic viability, of the agricultural operation. Such impacts are considered potentially significant.

Implementation of the proposed project would result in the development of urban uses adjacent to farmland throughout the central portion of the City. One of the most effective ways to address such indirect impacts is through the provision of buffers and right-to-farm policies that protect agricultural operations from urban impacts.

As discussed under Impact 4.2-1, the proposed CGPU presents numerous goals and policies that would help to minimize direct and indirect impacts to agricultural resources. Specifically, policies 10.8 and 10.9 in the Sustainability and Natural Resources Element address the issue of indirect impacts:

- 10.8 Buffers between agriculture and urban uses.** Require new developments, whether they are new urban or new agricultural uses, in which urban and agriculture uses would be adjacent to maintain a protective buffer that ensures land use conflicts do not occur.
- 10.9 Right to Farm.** Support the right of existing farms to continue operations.

Policy 10.8 would be a critical policy for mitigating the indirect impacts to farmland from adjacent urban uses by requiring the establishment of a buffer between urban and agricultural uses. Whenever development permits are issued for land projects that would create an urban-agricultural adjacency. Additionally, Policy 10.9 provides the City with the wherewithal to support existing agricultural operations in nuisance concerns that might arise from new urban development adjacent to operational farmlands. Collectively, these policies are expected to reduce indirect impacts to farmland to a less than significant level.

Mitigation Measures

No mitigation measures are feasible.

CUMULATIVE IMPACTS

Because the proposed project is a General Plan Update, which takes into account existing and potential development over approximately the next twenty years, the analysis of impacts to agriculture contained within this chapter of the EIR is already cumulative in nature. For this cumulative impacts analysis, the scope of the analysis has been bounded by consideration of the impacts to agriculture and agricultural resources within the County of Riverside as Coachella's agricultural resources are an important component to both the countywide resource base and agricultural economy. As discussed above, California is the leading agriculture producing state in the nation, and Riverside County is a major contributor with \$1,012,041,000 in agricultural sales in 2007.⁴ Yet, Riverside County has long been experiencing land use conversions away from agricultural as the County urbanizes (see Table 4.2-1). The County of Riverside is expected to grow by at least 600,000 people by 2035 and future development projects in the City of Coachella, the City's Sphere of Influence, the Coachella Valley, and the County of Riverside will result in the further loss of agricultural resources. These regional and county-wide trends are long-term trends that may result in cumulatively significant losses of agricultural resources. While the General Plan provides extensive policy direction that helps minimize the impacts to agricultural resources, the scope of these cumulative impacts extends beyond the jurisdiction of the City. These cumulative impacts could possibly be mitigated with region-wide or countywide agricultural preservation programs, such as the greenbelt program established in Ventura County. However, the establishment of such a program is beyond the scope of control of the City of Coachella as the City's control is limited to its jurisdiction. Such a program would need to be established and managed by the County or CVAG in conjunction with all of the cities in the County or the region. Thus, such mitigation would be infeasible for the City to implement. Thus, the conversion of Coachella's agricultural resources would be cumulatively considerable and the cumulative impacts to agricultural resources would be significant and unavoidable.

Mitigation Measures

No mitigation measures are feasible.

⁴ United States Department of Agriculture, Census of Agriculture, http://www.agcensus.usda.gov/Publications/2002/County_Profiles/California/index.asp, Accessed May 24, 2010

SIGNIFICANT AND UNAVOIDABLE IMPACTS

Implementation of the CGPU would result in the conversion of agricultural resources in the City of Coachella and within its Sphere of Influence. Similarly, implementation of the CGPU would likely result in conflicts with lands currently under Williamson Act contracts. Finally, implementation of the CGPU, in consideration of Countywide and region-wide development of agricultural resources, would result in cumulative impacts to agricultural resources. All three of these impacts would be significant and unavoidable.