

5. Environmental Analysis

5.2 AGRICULTURE AND FORESTRY RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the Rancho San Gorgonio Specific Plan to impact agriculture resources in the City of Banning. Banning does not have any areas designated forest land or timberland for production or resource management; therefore, forestry resources were closed out in the Initial Study (see Appendix A).

5.2.1 Environmental Setting

5.2.1.1 REGULATORY BACKGROUND

State

Farmland Mapping and Monitoring Program

Pursuant to Government Code Section 65570, the California Department of Conservation Farmland Mapping and Monitoring Program compiles important farmland maps for the state. These maps combine soil survey and current land use information from the United States Department of Agriculture and Natural Resource Conservation Service to provide an inventory of agricultural resources in each county. The maps show urbanized lands and a qualitative sequence of agricultural designations. County, state, and federal agencies have established several classifications of important agricultural land based on factors such as soil characteristics, climate, and water supply. These classifications include:

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

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

Unique Farmland. Lesser-quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include unirrigated orchards or vineyards. Land must have been cultivated at some time during the four years prior to the mapping date.

Farmland of Local Importance. Land of importance to the local economy, as defined by each county's local advisory committee and adopted by its board of supervisors. This refers to all farmable lands in the county that do not meet the definitions of Prime, Statewide, or Unique. This includes land that is or has been used for irrigated pasture, dryland farming, confined livestock and dairy, poultry facilities, aquaculture, and grazing land.

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California Land Conservation Act (Williamson Act)

The California Land Conservation Act, or Williamson Act, was adopted in 1965 (California Government Code §§ 51200 et. seq.). The act was established to encourage the preservation of agricultural lands in view of the increasing trend toward their “premature and unnecessary” urbanization. The act enables counties and cities to designate agricultural preserves (Williamson Act lands) and offer preferential taxation to agricultural landowners based on the land’s income-producing value. In return for the preferential tax rate, the landowner is required to sign a contract (Williamson contract) with the county or city agreeing not to develop the land for a minimum of 10 years. The contract is renewed automatically on its anniversary date unless a notice of nonrenewal or petition for cancellation is filed.

Local

City of Banning General Plan

The 161-acre portion of the site in unincorporated Riverside County is zoned Light Agriculture (A-1) by Riverside County and is designated Ranch/Agriculture in the City of Banning General Plan (see Figure 3-4, *Current Land Use Designations*). The City of Banning zoning designations onsite are the same as the general plan land use designations. The Ranch/Agriculture designation permits agriculture-related businesses such as feed stores, commercial stables, and similar uses in addition to agricultural and ranching activities.

5.2.1.2 EXISTING CONDITIONS

Existing Agricultural Uses

Since the 1980s, the project site has been used as rangeland for cattle and horses. Prior to that, it appears that the property was used for dry farming, including hay, alfalfa, and other grain crops. In the 1940s and earlier, there were orchards (e.g., citrus) in the northern and eastern portions of the site (RMA 2012).

Agricultural Designations and Contracts

Mapped Important Farmland

CEQA impact analysis for mapped important farmland focuses on three farmland categories: Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. There is no mapped farmland onsite in any of the three categories. Nearly the entire site consists of Farmland of Local Importance (about 714 acres) and Other Land (117 acres) (DLRP 2016a).

Farmland of Local Importance is defined by each county. Farmland of Local Importance in Riverside County is defined as:

- Soils that would be classified as Prime and Statewide but lack available irrigation water. Lands planted to dryland crops of barley, oats, and wheat.
- Lands producing major crops for Riverside County but that are not listed as Unique crops. Crops identified are permanent pasture (irrigated), summer squash, okra, eggplant, radishes, and watermelons.

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- Dairylands, including corrals, pasture, milking facilities, hay and manure storage areas if accompanied with permanent pasture or hayland of 10 acres or more.
- Lands identified by city or county ordinance as Agricultural Zones or Contracts, which includes City "Proposition R" lands. Lands planted to jojoba which are under cultivation and are of producing age (DLRP 2015a).

Other Land is land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land (DLRP 2016b).

Zoning for Agricultural Use

Approximately 161 acres in the southwest part of the site are zoned Ranch/Agriculture by the City of Banning Light Agriculture (A-1) by Riverside County.

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 non-forest 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 non-forest use.

The Initial Study, included as Appendix A, substantiates that impacts associated with the following thresholds would be less than significant:

- Threshold AG-1
- Threshold AG-3

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- Threshold AG-4
- Threshold AG-5

These impacts will not be addressed in the following analysis.

5.2.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.2-1: Buildout of the proposed project would conflict with the existing Light Agriculture zoning of 161 acres within the project site. [Threshold AG-2]

Impact Analysis: The project would convert 161 acres of land zoned Light Agriculture (A-1) by Riverside County to nonagricultural use. There are 30,617 acres designated Agriculture (AG) in the Western Riverside Council of Governments (WRCOG) region, which encompasses the part of the county between Orange County on the west and the crests of the San Jacinto and Santa Rosa mountains on the east.¹ The AG land use designation corresponds to five zoning districts defined in the Riverside County Zoning Code: Light Agriculture (A-1); Light Agriculture with Poultry (A-P); Heavy Agriculture (A-2); Agriculture with Dairy (A-D); and Citrus/Vineyard (C/V).

Land Evaluation and Site Assessment (LESA) Model Analysis

The Land Evaluation and Site Assessment (LESA) model was developed by the California Department of Conservation for gauging significance of impacts to mapped farmland. It is used here to determine whether the impact to land zoned for agricultural use would be a significant impact to agricultural resources. The LESA Model is based on a 100-point scale, and the LESA score has two parts. The Land Evaluation (LE) score rates the soil in relation to agriculture. The Site Assessment (SA) score rates all remaining factors as they pertain to agriculture.

Land Evaluation Score

Soil units, their acreages in onsite A-1 zoned areas, their percentages of the total A-1 acreage, and their land capability classifications (LCCs) were obtained from the Web Soil Survey maintained by the US Department of Agriculture. LCCs identify the relative degree of limitations for agricultural use inherent in the soils of a given area. In general, the fewer the limitations, the more suitable the soil is for agriculture, the lower the costs of overcoming limitations. LCCs also group soils based on risks of damage to soils by cropping. The LCC rating for each soil type is given a point value from the LESA Worksheets related to its suitability for most kinds of crops (Pease and Coughlin 1996). The LE score is the product of the percentage of A-1 areas times the LCC rating.

¹ The total acreages designated AG were obtained by adding the AG-designated areas in the 19 area plans in the county. The WRCOG region consists of 14 area plans plus most of a 15th (the Riverside Extended Mountain Area Plan [REMAP]). Some desert portions of central and eastern Riverside County are outside the 19 area plans (RCPD 2015; RCIT 2015).

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As shown in Table 5.2-1, the LE score for the project area zoned A-1 is 45.18 out of 100, indicating soils of moderate agricultural value.

Table 5.2-1 Land Evaluation Score

| Soil Unit Name | Acres in A-1 Areas | Percentage of Total A-1 Area | LCC Rating | LE Score |
|---|--------------------|------------------------------|------------|--------------|
| Greenfield sandy loam, 2 to 8 percent slopes, eroded | 45.6 | 28.5% | 70 | 19.95 |
| Greenfield sandy loam, 8 to 15 percent slopes, eroded | 4 | 2.5% | 70 | 1.75 |
| Hanford coarse sandy loam, 2 to 8 percent slopes | 5.5 | 3.5% | 70 | 2.45 |
| Ramona sandy loam, 2 to 5 percent slopes, eroded | 5.9 | 3.7% | 70 | 2.59 |
| Ramona sandy loam, 5 to 8 percent slopes, severely eroded | 4.1 | 2.6% | 70 | 1.82 |
| Ramona sandy loam, 8 to 15 percent slopes, severely eroded | 38.8 | 24.3% | 50 | 12.15 |
| Ramona sandy loam, 15 to 25 percent slopes, severely eroded | 33.7 | 21.1% | 20 | 4.22 |
| Riverwash | 18.2 | 11.4% | 0 | 0 |
| Terrace escarpments | 3.9 | 2.5% | 10 | 0.25 |
| Total | 159.7 | 100% | — | 45.18 |

Site Assessment Score

Project Site Size

Agriculture requires large fields, high-quality soils, and water sources. The LE score accounts for soils present on the project site. The SA score analyzes other factors, including the size of the project site. To calculate the project size score, the area of the project site is divided and categorized by capability classes (LCC Classes I through VIII), as shown in Table 5.2-2. The numerals indicate progressively greater limitations and narrower choices for practical agricultural use. The classes are defined as follows:

- 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 special conservation practices, or both.
- Class III soils have severe limitations that reduce the choice of plants.
- Class IV soils have severe limitations that reduce the choice of plants, or 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.
- Class VI soils have severe limitations that make them generally unsuitable for cultivation.
- Class VII soils have very severe limitations that make them unsuitable for cultivation.

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- Class VIII soils have very severe limitations that nearly preclude their use for commercial crop production.

The LCC Classes are grouped into Classes I and II (few to moderate limitations), Class III (severe limitations), and Classes IV-VIII (very severe limitations). The areas of each of the three groups of LCC classifications are totaled, and a score is assigned to each of those totals, as shown in Table 5.2-3 below. The highest of the three resulting scores is the project size score—70.

Table 5.2-2 Project Size Points

| LCC Class I and II | | LCC Class III | | LCC Class IV-VIII | |
|--------------------|--------|---------------|--------|-------------------|--------|
| Acres | Points | Acres | Points | Acres | Points |
| 80+ | 100 | 160+ | 100 | 320+ | 100 |
| 60-79 | 90 | 120-159 | 90 | 240-319 | 80 |
| 40-59 | 80 | 80-119 | 80 | 160-239 | 60 |
| 20-39 | 50 | 60-79 | 70 | 100-159 | 40 |
| 10-19 | 30 | 40-59 | 60 | 40-99 | 20 |
| under 10 | 0 | 20-39 | 30 | under 40 | 0 |
| --- | --- | 10-19 | 10 | --- | --- |
| --- | --- | under 10 | 0 | --- | --- |

Source: CDC 1997.

Table 5.2-3 Project Size Score Calculation

| Soil Unit Name | LCC Class (acres) | | |
|---|-------------------|-------------|-----------------|
| | Classes I and II | Class III | Classes IV-VIII |
| Greenfield sandy loam, 2 to 8 percent slopes, eroded | --- | 45.6 | --- |
| Greenfield sandy loam, 8 to 15 percent slopes, eroded | --- | 4 | --- |
| Hanford coarse sandy loam, 2 to 8 percent slopes | --- | 5.5 | --- |
| Ramona sandy loam, 2 to 5 percent slopes, eroded | --- | 5.9 | --- |
| Ramona sandy loam, 5 to 8 percent slopes, severely eroded | --- | 4.1 | --- |
| Ramona sandy loam, 8 to 15 percent slopes, severely eroded | --- | --- | 38.8 |
| Ramona sandy loam, 15 to 25 percent slopes, severely eroded | --- | --- | 33.7 |
| Riverwash | --- | --- | 18.2 |
| Terrace escarpments | --- | --- | 3.9 |
| Total | 0 | 65.1 | 94.6 |
| Project Size Score¹ | 0 | 70 | 20 |
| Highest Project Size Score | 70 | | |

¹ Division of Land Resource Protection 2015b, p. A-3.

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Water Resource Availability

This evaluation considers the availability and reliability of irrigation water, as it relates to the site's agricultural value. It is based on determining whether restrictions on water supply are likely to take place in years that are characterized as being periods of drought and nondrought. As shown in Table 5.2-4, *Water Resources Availability Points*, the LESA Model assigns a score based on whether the irrigated agricultural production onsite is feasible, and on physical and economic restrictions to agriculture in drought and nondrought years.

The A-1 zoned area, used as rangeland, is not in a water retail service area; thus, agricultural uses in the area rely on rainfall and groundwater. The A-1 zoned area is above the Banning Storage Unit of the San Gorgonio Pass Groundwater Basin. The Banning Storage Unit has an estimated safe yield of about 1,130 acre-feet per year, or about 1,008,000 gallons per day, and is about 3.9 square miles in area. However, the City of Banning has exclusive rights to groundwater from the Banning Storage Unit (Madole & Associates and Encompass Associates 2015). Thus, irrigated production onsite is infeasible due to the lack of irrigation water. Note also that part of the definition of Farmland of Local Importance in Riverside County is that irrigation water is lacking (see Section 5.2.1.2, Existing Conditions, above). Dryland production is considered feasible onsite in both drought and nondrought years. The estimated water availability corresponds to a water resource score of 25 (see Table 5.2-4).

Table 5.2-4 Water Resources Availability Points

| Option | Non-Drought Years | | | Drought Years | | | Water Resource Points |
|--------|---|------------------------|------------------------|--------------------------------|------------------------|------------------------|-----------------------|
| | Restrictions | | | Restrictions | | | |
| | Irrigated Production Feasible? | Physical Restrictions? | Economic Restrictions? | Irrigated Production Feasible? | Physical Restrictions? | Economic Restrictions? | |
| 1 | YES | NO | NO | YES | NO | NO | 100 |
| 2 | YES | NO | NO | YES | NO | YES | 95 |
| 3 | YES | NO | YES | YES | NO | YES | 90 |
| 4 | YES | NO | NO | YES | YES | NO | 85 |
| 5 | YES | NO | NO | YES | YES | YES | 80 |
| 6 | YES | YES | NO | YES | YES | NO | 75 |
| 7 | YES | YES | YES | YES | YES | YES | 65 |
| 8 | YES | NO | NO | NO | -- -- | -- -- | 50 |
| 9 | YES | NO | YES | NO | -- -- | -- -- | 45 |
| 10 | YES | YES | NO | NO | -- -- | -- -- | 35 |
| 11 | YES | YES | YES | NO | -- -- | -- -- | 30 |
| 12 | Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years | | | | | | 25 |
| 13 | Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years) | | | | | | 20 |
| 14 | Neither irrigated nor dryland production feasible | | | | | | 0 |

Source: CDC 1997.

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Zone of Influence

Some of the site assessment factors are measured in an area called the Zone of Influence (ZOI) surrounding the site. The ZOI consists of all the parcels within a rectangular band one-quarter mile wide around the A-1 area, which is approximately 936 acres.

Surrounding Agricultural Land Rating

Surrounding agricultural land was identified using aerial photographs from Nearmap.com. One 10-acre parcel, that is, slightly over 1 percent of the ZOI, is cultivated as an orchard and is mapped as Unique Farmland. The remainder of the ZOI does not show signs of row crops, grass crops, or orchard cultivation on aerial photographs. Therefore, the Surrounding Agricultural Land Rating is 1 percent.

If the Surrounding Agricultural Land Rating is 40 percent or less, the Surrounding Agricultural Land Score is zero.

Surrounding Protected Resource Land Rating

Surrounding protected resource land, that is, land with Williamson Act contracts in effect, was identified by Dennis Caslav, Senior Appraiser, Riverside County Assessor's Office (Caslav 2015). Approximately 360 acres (38 percent of the SOI) is protected resource land. The Protected Resource Land Score is therefore zero, which is assigned when the Protected Resource Land Rating is below 40 percent.

Site Assessment Factors Weighted Scores

The total weighted site assessment factor score equals 15 as shown below in Table 5.2-5.

Table 5.2-5 Site Assessment Weighted Factor Scores

| Site Assessment Factor ¹ | Factor Score | Factor Weight | Weighted Factor Scores |
|-------------------------------------|--------------|---------------|------------------------|
| Project Size | 70 | 0.15 | 10.5 |
| Water Resource Availability | 25 | 0.15 | 4.5 |
| Surrounding Agricultural Land | 0 | 0.15 | 0 |
| Surrounding Protected Resource Land | 0 | 0.05 | 0 |
| Total | — | — | 15 |

Source: Division of Land Resource Protection 2007, Appendix A.

Final LESA Score

The final LESA score for the land onsite zoned A-1 is 36.84, as shown below in Table 5.2-6. Impacts to agricultural land are considered less than significant when the final LESA score is less than 40. Thus, project-impacts to land zoned A-1 are considered less than significant.

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Table 5.2-6 Final LESA Score

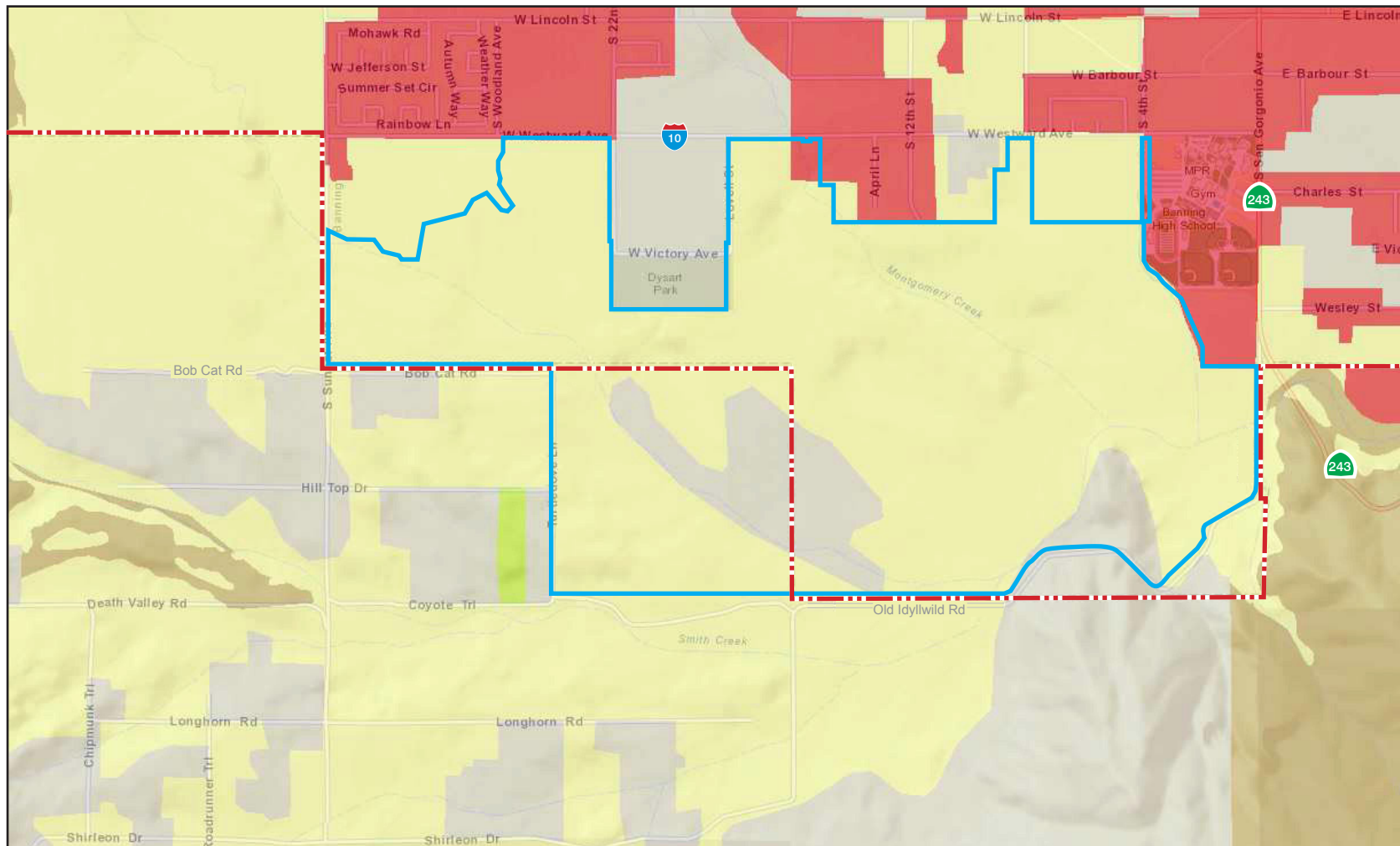
| | Factor Scores | Factor Weight | Weighted Factor Scores |
|-------------------------------------|---------------|---------------|------------------------|
| LE Factors | | | |
| LCC Score | 45.18 | 0.5 | 22.59 |
| <i>LE Subtotal</i> | ---- | ---- | 22.59 |
| SA Factors | | | |
| Project Size | 70 | 0.15 | 10.5 |
| Water Resource Availability | 25 | 0.15 | 3.75 |
| Surrounding Agricultural Land | 0 | 0.15 | 0 |
| Surrounding Protected Resource Land | 0 | 0.05 | 0 |
| <i>SA Subtotal</i> | ---- | ---- | 14.25 |
| FINAL LESA SCORE | | | 36.84 |

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Figure 5.2-1 - Farmland Map
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- | | | | |
|--|---|--|---|
| - - - - - City Boundary | Unique Farmland | Farmland of Local Importance | Urban and Built-up Land |
| _ _ _ _ _ Specific Plan Boundary | Grazing Land | Other Land | |

0 0.25
Scale (Miles)



Base Map Source: DLRP, 2012

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5.2.4 Cumulative Impacts

Analysis of cumulative agricultural impacts considers the entire WRCOG region, that is, the part of the county between Orange County on the west and the crests of the San Jacinto and Santa Rosa mountains on the east. The WRCOG region is considered rather than the entire county because the county contains two large active agricultural regions east of the WRCOG region—the eastern Coachella Valley and the Colorado River Valley—whereas much of the WRCOG region has transitioned from historical agricultural uses to urban uses. The area designated Agriculture (AG) in the Riverside County General Plan in the WRCOG region is 30,617 acres, about 16 percent of the total 195,440 acres designated AG in the entire county. Considering the low LESA score, the loss of 161 acres of land zoned A-1, that is, about 0.5 percent of the land designated AG in the WRCOG region, would not be a significant cumulative impact, and project impacts to agricultural resources would not be cumulatively considerable.

5.2.5 Existing Regulations

- California Government Code Sections 51200 et. seq.: Williamson Act

5.2.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, Impact 5.2-1 would be less than significant.

5.2.7 Mitigation Measures

Impacts would be less than significant, and no mitigation is required.

5.2.8 Level of Significance After Mitigation

Impacts would be less than significant.

5.2.9 References

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