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4.12.1 INTRODUCTION

This section describes the existing agricultural resources and potential impacts to those resources that would result from implementation of the proposed Project (Alternative 2), a "No Action/No Project" alternative" (Alternative 1), and five Project alternatives (Alternatives 3-7). This section evaluates if the proposed Project and alternatives would convert prime, unique, or farmland of statewide importance to nonagricultural uses; conflict with existing agricultural zoning uses or a Williamson Act contract; or involve other changes in the existing environment, which, due to their location or nature, could result in the conversion of farmland to nonagricultural uses.

4.12.1.1 Relationship of Proposed Project to Newhall Ranch Specific Plan Program EIR

This section (**Section 4.12**) represents a stand-alone assessment of the potential significant impacts to agricultural resources associated with the proposed Project; however, the previously certified Newhall Ranch environmental documentation provides important information and analysis for the RMDP and SCP components of the proposed Project. The Project components would require federal and state permitting, consultation, and agreements that are needed to facilitate development of the approved land uses within the Specific Plan site and that would establish spineflower preserves within the Project area, also facilitating development in the Specific Plan, VCC, and a portion of the Entrada planning area. Due to this relationship, the Newhall Ranch environmental documentation, findings, and mitigation, as they relate to agricultural resources, are summarized below to provide context for the proposed Project and alternatives.

Section 4.4 of the Newhall Ranch Revised Draft EIR (March 1999) identified and analyzed the existing conditions, potential impacts, and mitigation measures associated with agricultural resources for the entire Specific Plan area. In addition, Section 5.0 of the Revised Draft EIR (March 1999) identified and analyzed the potential agricultural resources impacts and mitigation measures associated with construction and operation of the approved WRP, which would treat the wastewater generated by the Specific Plan. The Newhall Ranch mitigation program was adopted by Los Angeles County in findings and in the revised Mitigation Monitoring Plans for the Specific Plan and WRP.

The Newhall Ranch Revised Draft EIR (March 1999) identified the conversion of the agricultural land to urban use as a significant unavoidable impact that would result from implementation of the Specific Plan and the WRP. The analysis also found a potential for future residents of the Specific Plan area to be incidentally exposed to agricultural-related activities. The Newhall Ranch Revised Draft EIR (March 1999), and related findings, determined that no feasible mitigation exists for the conversion of 595 acres of prime agricultural land (547 acres of Prime Farmland and 48 acres of Unique Farmland) on the Specific Plan site. Nonetheless, Mitigation Measures 4.4-1 and 4.4-2 were adopted to protect future residents from incidental exposure to agricultural-related activities on agricultural lands in Ventura County, including the imposition of a development setback from the Los Angeles County/Ventura County jurisdictional boundary line, and requirements to notify prospective homebuyers about the presence of on-going agricultural activities in Ventura County. Those mitigation measures are provided on **Table 4.12-1**.

The Newhall Ranch Revised Draft EIR (March 1999) acknowledged that cumulative development pressure in the County and the remainder of Southern California would continue, leading to a decline in

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the amount of cultivated agricultural land in the region. The contribution of the Specific Plan to the cumulative loss of prime agricultural land in the region was found to be significant.

Subsequently, the Los Angeles County Board of Supervisors directed that revisions be made to the Specific Plan, which resulted in a reduction in the development footprint and a corresponding reduction of 22 acres of impacted prime agricultural land. Nevertheless, the Board of Supervisors found that the Specific Plan's and WRP's impacts to agricultural resources would be significant and unavoidable even with implementation of all feasible mitigation measures. **Table 4.12-1** summarizes the Specific Plan's and the WRP's impacts on agricultural resources, the applicable mitigation measures, and the significance findings after the mitigation is implemented.

Table 4.12-1
Impacts to Agricultural Resources Caused By
Implementation of the Specific Plan and WRP

Impact Description	Mitigation Measures	Finding After Mitigation
<p>Specific Plan Agricultural Resources Impacts: Conversion of Prime Agricultural Land - The Specific Plan would result in the conversion of 595 acres of prime agricultural land (547 acres of Prime Farmland and 48 acres of Unique Farmland) to urban uses and is considered a significant impact. This acreage is found on many small, sometimes isolated parcels that are more difficult and less economical to farm than larger parcels of land. It is a continuing trend by the County to convert cultivated lands to urban uses to accommodate growth; therefore, the loss of agricultural <i>productivity</i> on the land is not considered a significant impact. Although this land has diminished agricultural productivity, the conversion of prime agricultural land is considered irreversible.</p> <p>[Note: The Los Angeles County Board of Supervisors subsequently directed that revisions be made to the Specific Plan, which resulted in a reduction in the development footprint and a corresponding reduction of 22 acres of impacted prime agricultural land.]</p>	<ul style="list-style-type: none"> • No feasible mitigation exists. 	<p>Significant unavoidable impact relative to the conversion of prime agricultural land to urban uses.</p>

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**Table 4.12-1
Impacts to Agricultural Resources Caused By
Implementation of the Specific Plan and WRP**

Impact Description	Mitigation Measures	Finding After Mitigation
<p>Specific Plan Agricultural Resources Impacts: Impairment of Agricultural Productivity - The Specific Plan may result in the incidental exposure of future residents of the Specific Plan site to agricultural-related activities on agricultural lands in Ventura County. This impact was <i>not</i> considered a significant impact.</p>	<ul style="list-style-type: none"> • SP-4.4-1 (prior to the close of escrow, purchasers of homes located within 1,500 feet of an agricultural field or grazing area are to be informed of the location and potential effects of farming uses); and • SP-4.4-2 (new homes within 1,500 feet of farming uses within Ventura County, if any, are to be informed that agricultural activities within Ventura County are protected under the County's right-to-farm ordinance, and are to be provided with copies of the County's Amended Ordinance 3730-5/7/85). 	<p>Not significant.</p>
<p>Specific Plan Cumulative Agricultural Resources Impacts - The cumulative conversion of prime agricultural land to urban uses constitutes a loss of an irreplaceable resource and is considered a significant cumulative impact.</p>	<ul style="list-style-type: none"> • No feasible mitigation exists. 	<p>Significant unavoidable impact.</p>
<p>WRP Agricultural Resources Impacts - Development of the WRP would result in the loss of 15 acres of prime agricultural land. This acreage is already economically impaired by its small size, its narrow, triangular configuration, and its location, and is more difficult and less economical to farm than larger parcels of land. It is a continuing trend by the County to convert cultivated lands to urban uses to accommodate growth; therefore, the loss of agricultural <i>productivity</i> on the land is not considered a significant impact. Although this land has diminished agricultural productivity, the conversion of prime agricultural land is a significant and irreversible impact.</p>	<ul style="list-style-type: none"> • No feasible mitigation exists. 	<p>Significant unavoidable impact relative to the conversion of prime agricultural land to urban uses.</p>

Source: Newhall Ranch Revised Draft EIR (March 1999); Newhall Ranch Revised Additional Analysis (May 2003).

4.12.1.2 Relationship of Proposed Project to VCC and Entrada Planning Areas**4.12.1.2.1 VCC Planning Area**

The SCP component of the proposed Project, if approved, would facilitate development in the VCC planning area. The VCC is reliant on the SCP and associated take authorizations, and would not be developed without the take authorizations due to grading constraints. The VCC planning area is the remaining undeveloped portion of the VCC commercial/industrial complex currently under development by the applicant. The VCC was the subject of an EIR certified by Los Angeles County in April 1990 (SCH No. 1987123005). The applicant recently submitted to Los Angeles County the last tentative parcel map (TPM No. 18108) needed to complete build-out of the remaining undeveloped portion of the VCC planning area. The County will require preparation of an EIR in conjunction with the parcel map and related project approvals; however, the County has not yet issued a Notice of Preparation (NOP) of the EIR or released the EIR. The VCC EIR (April 1990) did not analyze impacts to agricultural resources because there was no substantial evidence that agricultural resources would be impacted from implementation of the VCC project.

4.12.1.2.2 Entrada Planning Area

The applicant is seeking approval from Los Angeles County for planned residential and non-residential development within the Entrada planning area. The SCP component of the proposed Project would designate an area within Entrada as a spineflower preserve. If approved, the SCP component would include take authorization of spineflower populations in Entrada that are located outside of the designated spineflower preserve area. Thus, the planned residential and non-residential development within portions of the Entrada planning area is reliant on the SCP and associated take authorizations, and those portions would not be developed without the take authorizations. The applicant has submitted to Los Angeles County Entrada development applications, which cover the portion of the Entrada planning area facilitated by the SCP component of the proposed Project. However, as of this writing, the County has not yet issued a NOP of an EIR or released an EIR for Entrada. As a result, there is no underlying local environmental documentation for the Entrada planning area at this time.

4.12.2 METHODOLOGY

A significant impact to agricultural resources would result if the Project or an alternative would convert prime, unique, or farmland of statewide importance to a nonagricultural use, or result in development that would make future agricultural operations on significant farmland soils infeasible. Proposed development plans and previously approved plans for the Specific Plan and VCC planning area were compared to published maps of designated farmland areas to determine which Project areas would be converted to urban uses. Existing zoning designations for the Project area were evaluated to determine if proposed Project facilities would conflict with any existing agriculture zoning designations. The type and location of infrastructure facilities proposed by the Project, and development that subsequently could be facilitated by those facilities, were evaluated to determine if the proposed Project or the alternatives would have the potential to result in significant secondary impacts to agricultural resources located adjacent to the Project area or in the region.

4.12.3 REGULATORY SETTING

4.12.3.1 Federal

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service, formerly the Soil Conservation Service, intended to produce agriculture resource maps based on soil quality and land use across the nation. As part of this nationwide agricultural land use mapping effort, the Natural Resources Conservation Service developed a series of definitions for its Land Inventory and Monitoring criteria program. These criteria classified the land's suitability for agriculture production, and the suitability included both the physical and chemical characteristics of soils, as well as specified land use characteristics. Based on the Land Inventory and Monitoring criteria, the Natural Resources Conservation Service intended to complete a nationwide set of Important Farmland Maps; however, due to decreasing federal priorities, the program and mapping were never completed. Since 1980, the state of California has assisted the Natural Resources Conservation Service with the completion of mapping in the state. As explained further below, in 1982, the state of California established the Farmland Mapping and Monitoring Program within the Department of Conservation to carry on the mapping activity on a continuing basis, and with a greater level of detail.

The federal Farmland Protection Policy Act (7 U.S.C. § 4201 *et seq.*) applies to projects that are sponsored or financed in whole or in part by the federal government. The Act does not apply to private construction projects subject to federal permitting. As a result, the proposed Project is not subject to the Act because it is neither a federal agency-sponsored project, nor funded by the federal government.

4.12.3.2 State

State Farmland Designations. The goal of the state Department of Conservation's Farmland Mapping and Monitoring Program is to provide consistent, timely, and accurate data, including maps and statistical data, in order to assist decision makers in making informed decisions regarding the utilization of California farmland.

Using data from the Natural Resources Conservation Service, the Farmland Mapping and Monitoring Program produces maps and statistical data used for analyzing impacts on California's agricultural resources. The maps, called "Important Farmland Maps," are updated every two years with the use of aerial photo interpretation, a computer mapping system, field reconnaissance, and public review. The Farmland Mapping and Monitoring Program identifies seven categories of farmland: prime farmland; farmland of statewide importance; unique farmland; farmland of local importance; grazing land; urban and built-up land; and other land. The definitions for these agricultural land categories were developed by the Natural Resources Conservation Service as part of the nationwide Land Inventory and Monitoring criteria. The definitions have been modified for use in California. The most significant modification is that "prime farmland" and "farmland of statewide importance" must be irrigated land. The mapping of "grazing land" as part of the Important Farmland Maps is also unique in California. The minimum mapping unit is 10 acres, unless otherwise specified. Units of land smaller than 10 acres are incorporated into the surrounding map classifications. Each category of farmland is summarized below, based on A Guide to the Farmland Mapping and Monitoring Program (2004), prepared by the Department of Conservation.

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

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

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

Farmland of Local Importance (L). Land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee. Los Angeles County has determined that farmlands of local importance are lands that would meet the standard criteria for prime farmland or farmland of statewide importance, but are not irrigated.

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

Urban and Built-Up Land (D). Land occupied by structures with a building density of at least one unit to every one and one-half acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

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

Williamson Act Contracts. Agricultural uses in the state of California can be protected through a variety of legislative means, including the California Land Conservation Act, better known as the Williamson Act (see Gov. Code, § 51200 *et seq.*). The Williamson Act was adopted in 1965 to enable local governments (*e.g.*, cities, counties) to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural/open space uses. In return, landowners receive property tax assessments that are much lower than normal because they are based on farming and open space uses as opposed to full market value. As part of the contract, the landowner guarantees that the land will remain under agricultural use for 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). Not all local jurisdictions

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participate in the Williamson Act program. For example, Los Angeles County does not participate in the Williamson Act program, and no land within the County has ever been under a Williamson Act contract.

Agricultural Conservation Easements. The California Farmland Conservancy Program is a statewide grant funding program that supports efforts to establish agricultural conservation easements and planning projects for the purpose of preserving important agricultural land resources. The Program provides grants to local governments and qualified nonprofit organizations (such as land trusts). The grant funds are used to compensate a local government or nonprofit organization that voluntarily elects to impose an agricultural conservation easement on designated agricultural lands. This Program is best utilized by entities that have conservation of farmland among their stated purposes. In addition, the purchase of agricultural conservation easements is best accomplished in the context of a countywide strategic plan of farmland protection. Los Angeles County has not elected to participate in the California Farmland Conservancy Program.

4.12.3.3 Local

At the local level, enacting right-to-farm ordinances or adopting greenbelt agreements are additional methods of protecting agricultural uses near developing urban areas. Such actions have been adopted by several counties in the state of California, and such actions make it more difficult for homeowners to claim that their property rights are adversely affected by nearby farming operations if those operations existed when the homeowners purchase their property. To effectively protect farmland areas from development pressure, such ordinances or agreements should be implemented on a countywide basis. Los Angeles County has not adopted any right-to-farm ordinances, greenbelt agreements, or other regulations pertaining to conversion of farmland areas to nonagricultural uses within its unincorporated areas.

The Ventura County Save Open Space and Agricultural Resources (SOAR) initiative was approved by Ventura County voters on November 3, 1998 and limits future development of land in Ventura County. The SOAR initiative requires that land designated as Agricultural, Open Space or Rural in the County General Plan remain so designated unless redesignated by vote of the people. There are limited exceptions, however, the initiative remains in effect through December 31, 2020.

The County of Ventura and the City of Fillmore jointly adopted by ordinance the Fillmore/Piru Greenbelt on October 10, 2000 (Greenbelt Ordinance). The purpose of this Greenbelt Ordinance is to promote the agricultural and open space land conservation goals and policies contained in the General Plans of the City of Fillmore and the County of Ventura. The Greenbelt designation covers land located between the City of Fillmore and the Ventura County/Los Angeles County boundary.

4.12.4 EXISTING CONDITIONS

The applicant's land holdings have historically comprised the majority of cultivated farmland in the Santa Clarita Valley. The amount of irrigated crop acreage owned by the applicant in the Santa Clarita Valley and, therefore, the total revenue generated, has been decreasing over the past 40 years. For example, 613 acres of irrigated crops were cultivated in 2005. This represents a 39 percent decrease from the 1,008 acres of irrigated crops on land holdings in 1995, a 75 percent decrease from the 2,491 irrigated crop acreage in 1975, and a 81 percent decrease from the 3,224 irrigated crop acreage in 1965. The decrease in

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irrigated crop acreage on the applicant's holdings reflects a larger and continuing trend in Los Angeles County to convert cultivated farmland to urban land uses. This trend is expected to continue and it is demonstrated by the fact that much, if not all, of the remaining agricultural land east of I-5 has been zoned for urban land uses by both Los Angeles County and the City of Santa Clarita.

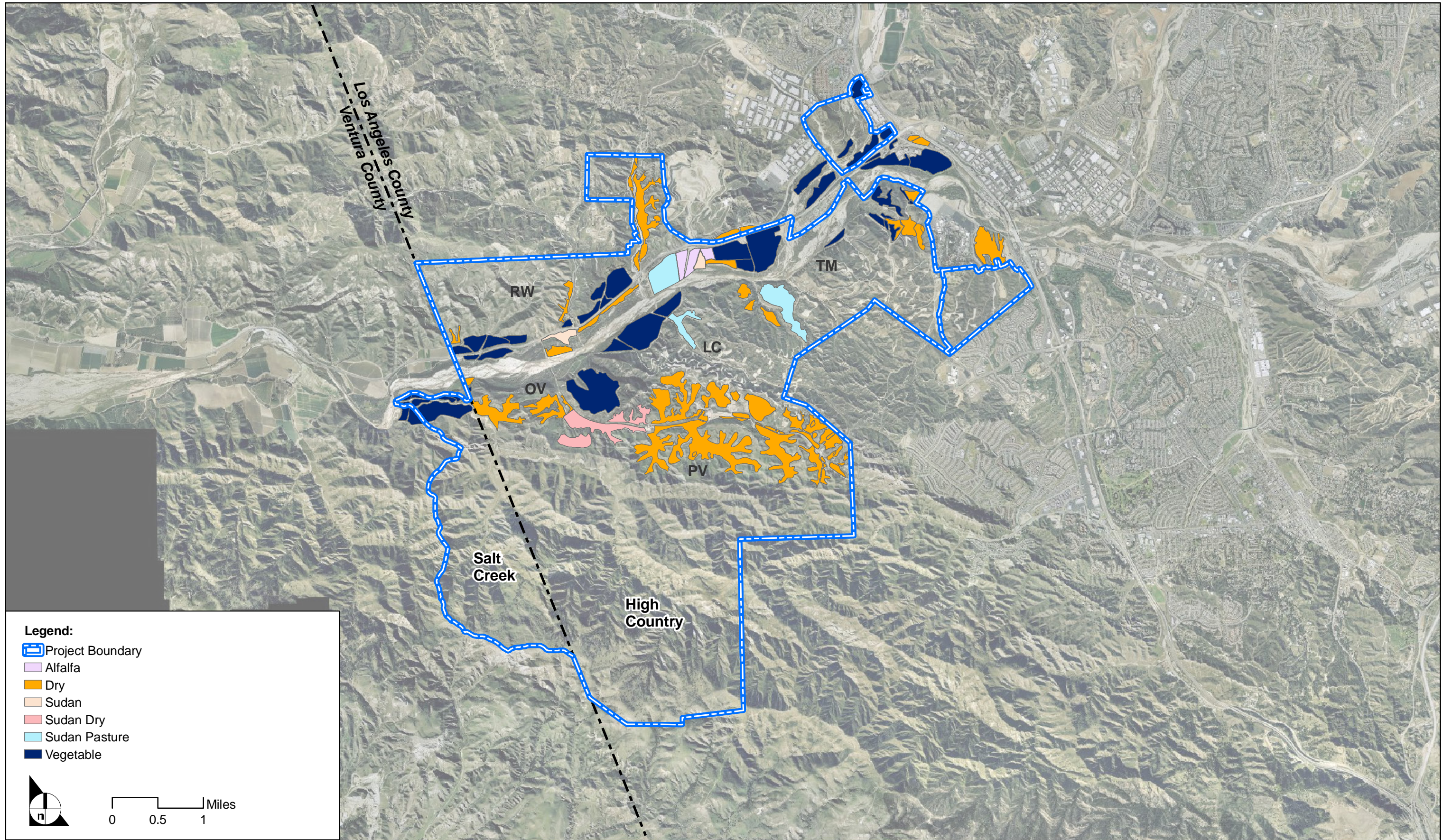
4.12.4.1 Project Area Agricultural Uses

Portions of the Project area historically have been cultivated with grapes, row crops, dry land crops, and walnuts by the applicant. In addition, land has been leased over the years for corn, vegetable crops (onions, parsley, cilantro, turnips, herbs, spinach, kale, red beets, radishes, and cucumbers), alfalfa, barley, and Christmas tree production. **Figure 4.12-1**, Existing Agricultural Uses, shows land cultivated within the Project area as of 2005. The amount of land within the Specific Plan site that was under agricultural production as of 2005 also is listed in **Table 4.12-2**. Agricultural production is defined as land that is either farmed for crop production or is used for grazing. In some locations throughout the Project area, agricultural production occurs on lands not designated as important farmland by the Department of Conservation's Farmland Mapping and Monitoring Program.

Agricultural Use	Acres
Land Under Cultivation	
Irrigated land	509
Dry land	1,368
Subtotal	1,877
Grazing Land	9,320
Total Agricultural Land	11,197

Source: Newhall Land, Agricultural Division (October 2005).

Of the 1,877 acres under cultivation in 2005, 509 acres were irrigated for the production of carrots, spinach, cilantro, turnips, red beets, barley, alfalfa, onions, kale, Sudan grass, permanent pasture, oat hay, and mixed vegetables. The remaining 1,368 acres under cultivation were dry farmed (not irrigated) for the production of crops such as barley.



SOURCE: URS - December 2007

FIGURE 4.12-1
Existing Agricultural Uses

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4.12.4.2 Water Usage for Agriculture

Water for the agricultural uses within the Project area is pumped from the Alluvial aquifer, located in the east subbasin of the Santa Clara River Valley. This groundwater basin consists of two aquifers, the Alluvial aquifer and the deeper, underlying Saugus Formation. The two aquifers occupy approximately 84 square miles in the central portion of the Castaic Lake Water Agency (CLWA) service area.

The applicant has historically used this groundwater for agricultural irrigation purposes on its agricultural land in Los Angeles County. The applicant has been farming its land within the Project area, and has used water from wells on its property to conduct its agricultural operations for several decades. The amount of available water from its agricultural operations is approximately 7,038 acre feet per year (afy) in both normal/average and dry years. The applicant currently owns and operates 19 wells to supply the agricultural water. The total production of these wells is reported in annual water reports issued since 1998.¹ As development within the Specific Plan portion of the Project area occurs, the agricultural land in that area ultimately will be taken out of farming production and converted to nonagricultural Specific Plan residential, mixed-use, and nonresidential land uses. Potential water supply impacts of the proposed Project are evaluated in **Section 4.3**, Water Resources, of this EIS/EIR.²

4.12.4.3 Designated Farmlands within Project Area

California's Department of Conservation has delineated farmlands within the Project area, and based on that data, the Project area includes 12,369 acres of designated farmland. Of this mapped total, approximately 669 acres are defined as prime farmland, 248 acres are defined as unique farmland, and 78 acres are designated as farmland of statewide importance. In addition there are also 133 acres designated as farmland of local importance and 11,241 acres of grazing land (see **Table 4.12-3**, below).

Table 4.12-3
Project Area Designated Farmlands of Importance

Category	RMDP (acres)	Salt Creek Area (acres)	VCC (acres)	Entrada (acres)	Total Project (acres)
Prime Farmland	624.2	36.1	14.8	0.0	675.2
Farmland of Statewide Importance	16.3	59.9	4.1	0.0	80.3
Unique Farmland	231.4	4.7	34.8	0.0	270.9
Subtotal	871.9	100.7	53.7	0.0	1,026.3

¹ For further information, please refer to the annual Santa Clarita Valley Water Reports from 1998 through 2004. These reports are incorporated by reference and available for public review and inspection at the County of Los Angeles Public Library, Valencia Branch, 23743 West Valencia Boulevard, Santa Clarita, California 91355-2191.

² For further information regarding the applicant's water resources, please refer to the Newhall Ranch Specific Plan Revised Additional Analysis, Volume VIII, Section 2.5, Water Resources (May 2003).

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**Table 4.12-3
Project Area Designated Farmlands of Importance**

Category	RMDP (acres)	Salt Creek Area (acres)	VCC (acres)	Entrada (acres)	Total Project (acres)
Farmland of Local Importance	69.7	62.7	0.0	0.0	132.5
Grazing Land	9,336.9	1,347.2	256.8	279.5	11,220.3
Agricultural Land Subtotal	10,278.5	1,510.6	310.5	279.5	12,379.1
Urban and Built-up Land	17.6	0.0	5.4	2.1	25.1
Other Land	1,836.9	7.1	5.4	34.5	1,883.9
Total	12,133.0	1,517.7	321.3	316.1	14,288.1

Source: Acreages of the important farmland categories were calculated from Department of Conservation Important Farmlands Maps (2004).³

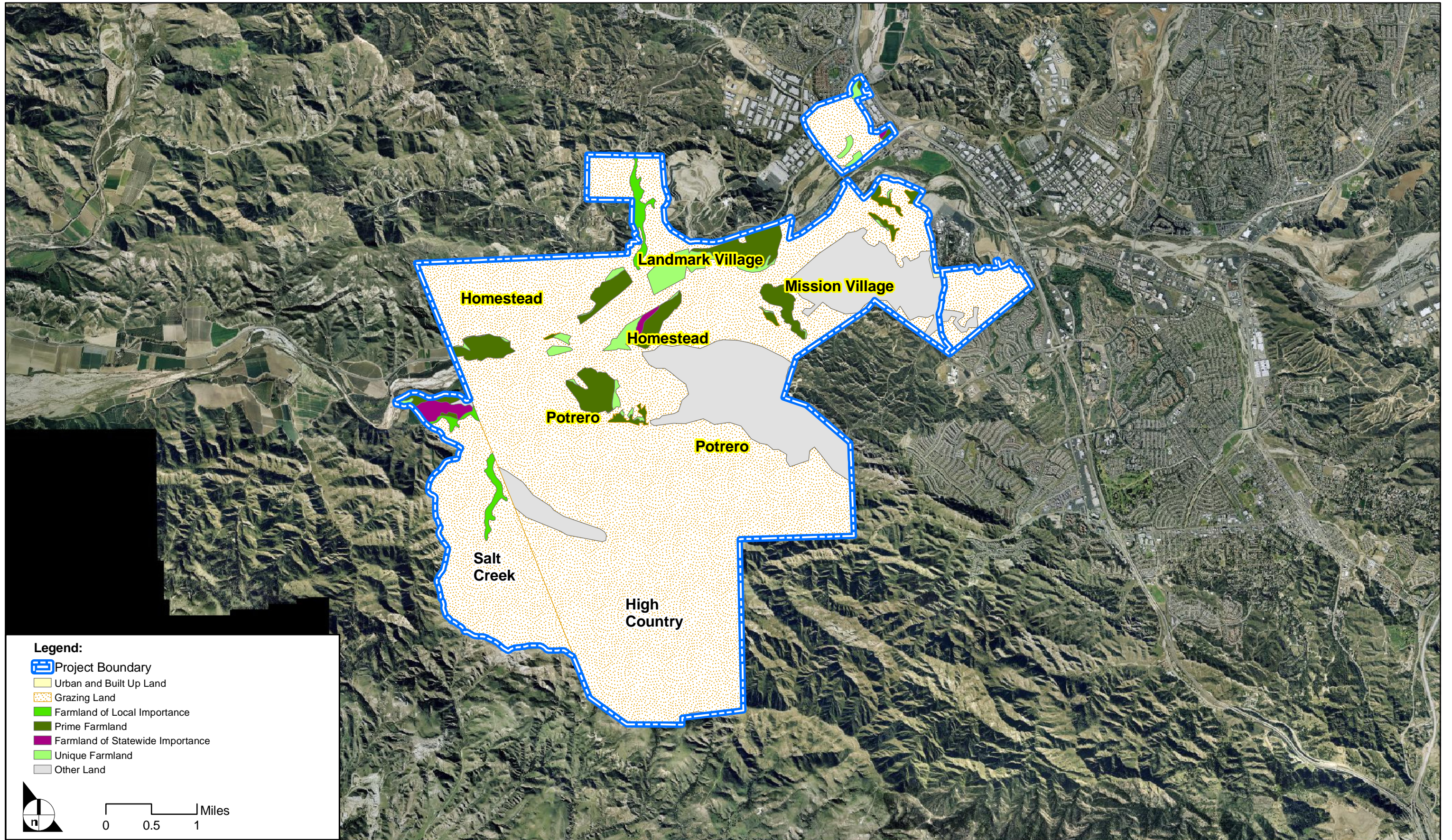
Figure 4.12-2 depicts important farmland within the Project area. As shown on, within the Specific Plan area, prime and unique farmlands are located along the northern and southern sides of the Santa Clara River, as well as on the mesas (Potrero and Grapevine) elevated above the southern side of the River. One large patch of locally important farmland extends from the River up into Chiquito Canyon, and one small piece of farmland of statewide importance is present on the south side of the River, near the mouth of Long Canyon. The grazing land is spread across the entire Specific Plan area, as shown on **Figure 4.12-2**.

The Entrada planning area primarily is comprised of grazing land. A portion of the Entrada planning area presently is used for cattle grazing.

The VCC planning area mainly is designated as grazing land, but also contains small areas of prime, unique, and farmland of statewide importance. The southern portion of the VCC planning area is used for row crop production.

As shown on **Figure 4.12-1**, above, the cultivated farmland on the Project site is not one continuous piece of property. Rather, it is found on many small, sometimes isolated areas, which, in some cases, are not level and not irrigated due to their distance from existing water sources. Also, land located south of the Santa Clara River on the mesas can only be accessed *via* a series of temporary river crossings that frequently wash out in winter months and are costly to maintain. Finally, increased traffic volume along SR-126 makes it difficult to move farm equipment across the highway between fields. Such conditions make land on the Project site more difficult and less economical to farm than the larger parcels of land owned by the applicant and others found to the west in Ventura County.

³ California's Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, updates changes in farmland and grazing land; however, no substantial changes (*e.g.*, converting farmland to urban uses) have occurred on the Project site since 2004. Therefore, farmland designation data from 2004 is still representative of conditions on the Project site.



SOURCE: URS - December 2007

FIGURE 4.12-2

Important Farmland within the Project Area

4.12.4.4 Existing Land Uses Related to Proposed Spineflower Preserve Areas

The SCP component of the proposed Project involves the establishment of five spineflower preserve areas. The proposed preserve areas are generally referred to as the Airport Mesa, Grapevine Mesa, San Martinez Grande, Potrero and Entrada Preserve Areas.

The Airport Mesa Preserve Area encompasses approximately 45 acres along south- and west-facing slopes surrounding Airport Mesa within the Specific Plan area. The area surrounding this preserve historically has been used for agriculture (irrigated row crops and dry-farmed row crops) and grazing. Adjacent existing land uses include staging for agricultural operations on the graded mesa top above this preserve, and active cultivation in the canyon bottom below the preserve. The Farmland Mapping and Monitoring Program specifies that the majority of the land within the proposed Airport Mesa Preserve Area is designated as grazing land, although a 1.7-acre portion is designated as prime farmland.

The Grapevine Mesa Preserve Area encompasses approximately 46 acres on south- and west-facing slopes along the western margin of Grapevine Mesa within the Specific Plan area. The eastern margin of this preserve includes agricultural lands along the mesa top, with the majority of the preserve area on slopes surrounding the mesa. The Farmland Mapping and Monitoring Program indicates that the land within the proposed Grapevine Mesa Preserve Area is designated as grazing land (31 acres) and prime farmland (15 acres).

The San Martinez Grande Preserve Area encompasses approximately 34 acres on slopes below the primary north-south trending ridgeline on the west side of San Martinez Grande Canyon. The areas in the vicinity of the San Martinez Grande Preserve Area historically have been used for agriculture and grazing. A single-family residence and a barn used for hay storage currently are located to the south of this preserve on the west side of San Martinez Grande Canyon Road. The Farmland Mapping and Monitoring Program indicates that the entirety of the proposed San Martinez Grande Preserve Area is designated as grazing land.

The Potrero Preserve Area consists of approximately 15 acres located on the west side of Potrero Canyon near Windy Gap within the Specific Plan area. Current land uses within Potrero Canyon include ongoing agricultural and ranching operations. Adjacent to this preserve to the south are actively farmed fields. The Farmland Mapping and Monitoring Program indicates that the entire Potrero Preserve Area is designated as grazing land.

The Entrada Preserve Area encompasses approximately 27 acres, and constitutes the easternmost occurrence of spineflower on the applicant's land holdings. There are no existing agricultural uses or operations adjacent to this preserve. Southern California Edison (SCE) and Southern California Gas Company (SCGC) transmission lines are situated along the southeastern boundary within this preserve area, and include actively maintained dirt roads through the proposed preserve area. The Farmland Mapping and Monitoring Program indicates that the proposed Entrada Preserve Area is designated as grazing land.

4.12.5 IMPACT SIGNIFICANCE CRITERIA

The significance criteria listed below are from Appendix G of the State CEQA Guidelines. The Corps has agreed to use the CEQA criteria presented below for purposes of this EIS/EIR, although significance conclusions are not expressly required under NEPA. The Corps also has applied additional federal requirements as appropriate in this EIS/EIR.

The impacts to agricultural resources would be significant if implementation of the proposed Project or its alternatives would:

- (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, to nonagricultural use;
- (2) Conflict with existing zoning for agricultural use, or a Williamson Act contract; or
- (3) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to nonagricultural use.

4.12.6 IMPACTS OF THE PROPOSED PROJECT AND ALTERNATIVES

4.12.6.1 Impacts of Alternative 1 (No Action/No Project)

Under Alternative 1, no action would be taken and the proposed Project would not be developed. Under this alternative, there would be no construction of bridges, bank stabilization, grade control structures, detention basins, storm drains, the outfall for the WRP, utility crossings, haul routes, or infrastructure-related maintenance activities. Consequently, Alternative 1 would result in the continuation of existing conditions, no farmland would be converted to urban uses, and no direct impacts to farmland or agricultural resources located on the Project site would occur under Significance Thresholds 1, 2, and 3.

Under Alternative 1, no infrastructure would be built and the proposed SCP would not be implemented to facilitate development within the Specific Plan, or on the portions of the VCC and Entrada areas included in the proposed Project. Therefore, Alternative 1 would not result in the conversion of any farmland located on or off the Project site to infrastructure or urban uses. Consequently, this alternative would not result in any significant indirect or secondary impacts to farmland or agricultural resources under Significance Thresholds 1, 2, or 3.

4.12.6.2 Impacts of Alternative 2 (Proposed Project)

4.12.6.2.1 Direct Impacts

RMDP Direct Impacts. Implementation of the RMDP would result in the installation of infrastructure improvements in areas presently used as irrigated cropland and dry farmland, which are located primarily along the Santa Clara River Corridor. Direct impacts to designated agricultural farmland would result from the construction and operation of RMDP infrastructure facilities that would cover the soil, convert the Project site to an infrastructure-related use, or otherwise make future cultivation operations at the Project site infeasible. The RMDP infrastructure improvements would result in the permanent conversion

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of 53.2 acres of prime farmland, 65.2 acres of unique farmland, and 4.4 acres of farmland of statewide importance to nonagricultural uses. In addition, the RMDP would convert 21.7 acres of farmland of local importance and 1,161.6 acres of grazing land to nonagricultural uses. Acreages of farmland directly impacted by RMDP components under Alternative 2 are summarized in **Table 4.12-4**. In total, the construction of RMDP infrastructure facilities would result in the direct conversion of 122.8 acres of prime farmland, unique farmland, and farmland of statewide importance to nonagricultural uses. Therefore, the RMDP would result in a significant direct impact to agricultural resources under Significance Threshold 1.

The Specific Plan site is zoned "Specific Plan" by Los Angeles County Ordinance No. 2003-0031Z. The "Specific Plan" zoning designation allows a broad range of residential, mixed-use, and nonresidential land uses within the Specific Plan site, and the infrastructure facility improvements proposed by the RMDP would also be permitted uses. The Specific Plan area is not part of any Williamson Act contract. Therefore, the development of RMDP infrastructure improvements would not conflict with existing agricultural zoning or the requirements of a Williamson Act contract, and would not result in a significant impact under Significance Threshold 2.

The RMDP would result in the development of roads, bridges, drainage facilities, and other infrastructure improvements on the Specific Plan site. However, the RMDP would not result in the development of habitable structures or other facilities that would conflict with agricultural operations located on or off the Project site. Therefore, the RMDP would not result in a significant impact to agricultural resources under Significance Threshold 3.

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**Table 4.12-4
Area of Important Farmland Affected by the Proposed Project (Alternative 2)**

	Prime Farmland (acres)	Unique Farmland (acres)	Farmland of Statewide Importance (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)	Total (acres)
Newhall Ranch Specific Plan Site						
RMDP Direct Impacts						
Bank Stabilization	16.1	29.2	3.1	17.5	976.5	1,042.4
Bridges and Road Crossings	0.7	1.6	0	0.4	27.1	29.8
Grade Control Structures	0.1	0	0	0.7	3.4	4.1
Debris and Water Detention Basins	32.7	9.6	0	0.7	68.6	111.6
Trails & Viewing Platforms	0.1	0.3	1.3	1.9	29.8	33.5
Storm Drains and Drainages	2.7	1.3	0	0.1	20.8	24.8
Converted to Buried Storm Drain Restoration	0.7	23.0	0	0.3	33.6	57.6
Other (Fill, Open Space Recreational, Haul Routes)	0	0.2	0.1	0	1.9	2.2
Subtotal RMDP Direct Impacts	53.2	65.2	4.4	21.7	1,161.6	1,306.0
SCP Direct Impacts						
Spineflower Preserves	17.1	0	0	0	123.4	140.5
RMDP/SCP Indirect Impacts						
Specific Plan Development	558.7	163.6	13.9	54.8	4,059.8	4,850.8
High Country SMA	0.1	0	0	0.7	3,906.4	3,907.1
River Corridor SMA	0.2	3.0	0	0.1	100.4	103.7
Salt Creek Conservation Area	0.0	0.0	0.0	0.0	1,332.6	1,332.6
Subtotal RMDP/SCP Indirect Impacts	559.1	166.7	13.9	55.5	9,399.0	10,194.2
Subtotal RMDP Area	629.3	231.9	18.3	77.2	10,684.0	11,640.8
Entrada Planning Area						
SCP Direct Impacts						
Spineflower Preserves	0	0	0	0	26.9	26.9
SCP Indirect Impacts						
Entrada Development	0	0	0	0	252.6	252.6
Subtotal Entrada					279.5	279.5
VCC Planning Area						
SCP Direct Impacts						
Spineflower Preserves	0	0	0	0	0	0
SCP Indirect Impacts						
VCC Development	14.8	34.8	4.1	0	256.8	310.5
Subtotal VCC	14.8	34.8	4.1	0	256.8	310.5
GRAND TOTAL	644.2	266.7	22.4	77.2	11,220.3	12,230.7

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SCP Direct Impacts. The proposed SCP would establish spineflower preserves on 167.6 acres of the Specific Plan site and the Entrada planning area. As proposed, approximately 17.1 acres of prime farmland and 123.4 acres of grazing land would be included within the boundaries of the spineflower preserves (see **Table 4.12-4**) in both the Specific Plan area and Entrada planning area. The conversion of 17.1 acres of prime farmland located on the Specific Plan's Airport Mesa and Grapevine Preserve areas to a nonagricultural use would result in a significant impact to agricultural resources under Significance Threshold 1.

The Specific Plan site, which has a zoning designation of "Specific Plan," allows a wide variety of land uses. The establishment of the proposed spineflower preserves on the Specific Plan site would not conflict with the existing zoning designation of the Project site, and would not result in a significant impact under Significance Threshold 2.

The Entrada planning area currently is zoned for agricultural uses, and the applicant currently leases portions of the Entrada planning area for cattle grazing. The establishment of the Entrada preserve would preclude future grazing operations within the preserve, conflicting with the Entrada area's existing agricultural zoning. This conflict with the existing zoning would continue until such time as the zoning of the Entrada planning area is changed, as requested via development applications filed with Los Angeles County. Because establishment of a spineflower preserve on the Entrada planning area would conflict with the existing agricultural zoning for that area, including the precluding of existing and ongoing agricultural cattle grazing operations, the conflict is considered a significant project-related impact under Significance Threshold 2. This conflict would be temporary if the proposed Entrada development project is approved by Los Angeles County because such approval would result in a zone change; changing the existing agricultural zoning to a designation that is consistent with the proposed spineflower preserve land use designation. However, if a change in zoning is not approved by Los Angeles County, the proposed Entrada preserve would result in a significant conflict with the site's existing agricultural zoning and current use for cattle grazing. This conflict would continue until the site's zoning is changed to a designation that allows open space preserves or a similar type of use. This conflict is considered a significant unavoidable impact because it is beyond the control of the applicant to implement the zone change required to eliminate the existing zoning conflict.

The establishment of proposed spineflower preserves on the Specific Plan site and on Entrada would not result in the development of habitable structures or other facilities that would conflict with agricultural operations located on or off the Project site. Therefore, the SCP would not result in a significant impact to agricultural resources under Significance Threshold 3.

4.12.6.2.2 Indirect Impacts

RMDP Indirect Impacts. Construction and operation of the proposed RMDP infrastructure improvements would result in indirect impacts to agricultural resources by facilitating the development of residential and nonresidential uses included in the previously approved Specific Plan. The dedication of the High Country and River Corridor SMAs as permanent open space also would preclude commercial grazing operations in those areas, but grazing for the purpose of resource conservation is permitted.

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Build-out of the previously approved Specific Plan would result in the permanent removal of commercial agricultural land uses and operations throughout the Specific Plan site except those necessary for resource conservation purposes (invasive weed control, raptor foraging habitat, *etc.*). By facilitating development of the Specific Plan, the RMDP would indirectly result in the permanent conversion of approximately 558.7 acres of prime farmland, 163.6 acres of unique farmland, and 13.9 acres of farmland of statewide importance to urban and open space land uses (see **Table 4.12-4**). The conversion of approximately 739.6 acres of farmland with prime, unique, and soils of statewide importance to nonagricultural uses would be a significant indirect impact under Significance Threshold 1.

Adopted management provisions for the Salt Creek conservation area in Ventura County, adjacent to the Specific Plan site, would preclude commercial grazing on 1,332.6 acres of designated grazing land located in the Salt Creek area. However, the area located in the southern portion of the Salt Creek conservation area that is presently under cultivation and that contains approximately 88 acres of prime, unique and farmland of statewide importance would remain in agricultural production after build-out of the Specific Plan. Since no prime, unique, or farmlands of statewide importance would be converted to urban uses in this area, no significant impacts to agricultural resources under Significance Threshold 1 would occur in the Salt Creek conservation area.

The Specific Plan site has been zoned "Specific Plan" by Los Angeles County. The "Specific Plan" zoning designation allows the development of residential, mixed-use, and nonresidential land uses on the Specific Plan site, and the Specific Plan site is not part of any Williamson Act contract. Therefore, development of the previously approved Specific Plan would not conflict with any agricultural zoning designation or the requirements of a Williamson Act contract, and would not result in a significant impact under Significance Threshold 2.

The potential for urban development located on the Specific Plan site to impact agricultural resources located beyond the Project area boundaries has been minimized by mitigation measures included in the Newhall Ranch Specific Plan Program EIR (see **Subsection 4.12.1.1** of this EIS/EIR). These mitigation measures require a 1/2-mile wide setback of development from the Los Angeles County/Ventura County line south of the Santa Clara River, and a 1/8-mile wide setback of development from the Los Angeles County/Ventura County line north of SR-126. These setback areas minimize the potential for urban/agriculture conflicts, such as dust, noise, spraying, and trespass onto agricultural lands. Therefore, development on the Specific Plan site that would be facilitated indirectly by the RMDP would not result in significant impacts to agricultural operations in Ventura County under Significance Threshold 3.

SCP Indirect Impacts. Implementation of the proposed SCP would facilitate development of the previously approved Specific Plan. The indirect impacts to agricultural resources resulting from development of the Specific Plan are described above as indirect impacts of implementing the proposed RMDP. The indirect impacts of the proposed SCP in regard to facilitated build-out of the Specific Plan would be the same as the indirect impacts of the RMDP, which would result in significant indirect farmland conversion impacts under Significance Threshold 1.

Implementation of the proposed SCP would facilitate build-out of the previously approved VCC project. Build-out of the previously approved VCC project would result in the conversion of 14.8 acres of prime

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farmland, 34.8 acres of unique farmland, and 4.1 acres of farmland of statewide importance to nonagricultural uses. The conversion of 53.7 acres of prime, unique, and soils of statewide importance would be a significant impact under Significance Threshold 1.

The VCC planning area is zoned for commercial-related uses; and, therefore, the conversion of designated agricultural lands to nonagricultural uses would not conflict with an existing agricultural zoning designation and would not result in a significant indirect impact under Significance Threshold 2. The commercial and other related land uses that would be established on the VCC planning area would not conflict with farmland located in the Project region, such as farmland in Ventura County, which is five miles west of the VCC planning area. Therefore, implementation of the SCP and the facilitated development in the VCC planning area would not result in significant indirect impacts under Significance Threshold 3.

The proposed SCP would result in the establishment of a spineflower preserve in the Entrada planning area, which would facilitate the development of new residential, commercial, and other land uses on a portion of the Entrada planning area. In the Entrada planning area, proposed development would result in the conversion of 252.6 acres of grazing land to nonagricultural uses. The conversion of areas with grazing soils to a nonagricultural use is not a significant impact under Significance Threshold 1.

The Entrada planning area currently is zoned for agricultural uses. Development facilitated by the SCP on portions of the Entrada planning area would be inconsistent with the existing agricultural zoning, which would result in a significant impact under the requirements of Threshold 2. However, the future development of urban uses in the Entrada planning area could not occur until the zoning of the Entrada planning area is changed. Such a zone change has been requested via development applications for the Entrada project filed by the applicant with Los Angeles County, and the requested zone change would eliminate the existing agricultural zoning and provide a designation consistent with the proposed urban development. Therefore, the urban development that would be facilitated by the SCP in the Entrada planning area could not conflict with existing agricultural zoning requirements, and would not result in a significant impact under Significance Threshold 2.

The residential, commercial, and other related land uses proposed for the Entrada planning area would not result in the establishment of land uses that would conflict with farmland located in the Project region, such as farmland in Ventura County, which is five miles west of the Entrada planning area. Therefore, implementation of the SCP and the facilitated development in the Entrada planning area would not result in significant indirect impacts under Significance Threshold 3.

4.12.6.2.3 Secondary Impacts

RMDP Secondary Impacts. The conversion of designated farmland on the Specific Plan site to nonagricultural uses is a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the RMDP would not result in significant secondary impacts under Significance Thresholds 1 or 2.

Implementation of the Specific Plan and the resulting discontinuation of commercial agricultural operations on the Specific Plan site would not result in significant secondary impacts to agricultural

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support facilities that are relied upon by other agricultural operations located in the Project region. For example, potential secondary impacts to off-site agricultural product packing facilities that support agricultural operations in the Project region would not be significant because crops grown in the Project area generally are packed in the field. Therefore, the elimination of agricultural production from the Project area would not affect significantly the viability of these types of off-site agricultural support facilities. Other potential impacts that may affect regional agricultural support facilities (*e.g.*, a decrease in fertilizer or farm equipment sales, or a reduction in seasonal employment opportunities) generally would be in the form of economic effects, not environmental impacts. In addition, the Ventura County SOAR requirements and the Ventura County/City of Fillmore Greenbelt Ordinance would minimize the potential for the conversion of agricultural land in Ventura County near the Project site. Therefore, the RMDP component of the proposed Project would not result in significant secondary environmental impacts to agricultural operations in Ventura County under Significance Threshold 3.

Urban/agricultural land use conflicts can impair agricultural operations. These conflicts can individually or cumulatively decrease the efficiency of farming operations, which causes production costs to rise, and high production costs can contribute to land use conversions. To mitigate this potential impact, Los Angeles County adopted mitigation measures as part of the Newhall Ranch Specific Plan Program EIR (refer to **Subsections 4.12.1.1** and **4.12.6.2.2** of this EIS/EIR) to minimize potential urban/agricultural land use conflicts that could occur between Specific Plan development and the agricultural operations that would continue to occur in Ventura County. These mitigation measures include the establishment of land use buffers to minimize urban/agricultural land use conflicts that could compromise agricultural operations west of the Project area in Ventura County. With implementation of these mitigation measures, potentially significant impacts to agricultural resources in Ventura County would be reduced to a less-than-significant level under Significance Threshold 3. Potential impacts to agricultural operations in Ventura County also would be minimized by existing programs adopted by Ventura County, including the County's General Plan designations of agricultural properties and its right-to-farm ordinance, which protect the agricultural land holdings in Ventura County from undue land speculation and conversion. Therefore, no additional mitigation measures are required.

SCP Secondary Impacts. The SCP component of the Project would facilitate future development on the Specific Plan site and the VCC and Entrada planning areas. Potential secondary impacts to agricultural operations and resources located beyond the boundaries of the Specific Plan site that would result from the build-out of the Specific Plan are evaluated above. That evaluation concluded that subsequent development located on the Specific Plan site would not result in significant secondary impacts under Significance Thresholds 1, 2, and 3.

The Entrada planning area presently is used for grazing, and agricultural operations occur on the VCC planning area. The conversion of designated agricultural lands on the Entrada and VCC planning areas to nonagricultural uses would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the SCP would not result in significant secondary impacts Significance Thresholds 1 or 2. Implementation of the SCP and the resulting elimination of limited grazing operations on the Entrada planning area would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. The establishment of urban uses on the Entrada and VCC planning areas

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would not conflict with remaining agricultural operations in Ventura County, which are approximately five miles west of these project areas. Therefore, the proposed SCP would not result in significant secondary impacts under Significance Threshold 3.

Table 4.12-5 summarizes the potential for significant agricultural resources to be impacted as a result of the direct, indirect, and secondary impacts of Alternative 2.

Table 4.12-5				
Alternative 2 Direct/Indirect/Secondary Significant Impacts				
Aggregate Totals				
Type of Impact	Potential for Impacts to Agricultural Soils			
	Prime (acres)	Unique (acres)	Statewide Importance (acres)	Total (acres)
Direct	70.3	65.2	4.4	139.9
Indirect	559.1	166.7	13.9	739.6
Secondary	0	0	0	0
Total	629.3	231.9	18.3	879.5

4.12.6.3 Impacts of Alternative 3 (Elimination of Planned Potrero Bridge and Additional Spineflower Preserves)

Alternative 3 would result in the elimination of some of the proposed RMDP infrastructure improvements proposed for the Specific Plan site when compared to the proposed Project, and increase the size of proposed spineflower preserves from 167.6 to 221.8 acres. Subsequent development on the Specific Plan site, and on the VCC and Entrada planning areas also would be reduced, as Alternative 3 would facilitate the development of 21,558 residential dwelling units and approximately 9,330,000 square feet of nonresidential uses.

4.12.6.3.1 Direct Impacts

RMDP Direct Impacts. Direct impacts to designated agricultural land would result from construction and operation of the facilities and improvements necessary to implement the RMDP component of Alternative 3. Implementation of Alternative 3 would result in the permanent conversion of 63.6 acres of prime farmland, 67.8 acres of unique farmland, and 5.1 acres of farmland of statewide importance to nonagricultural uses. In total, 136.4 acres of important farmland would be converted permanently to infrastructure-related uses to support future urban development. Acreages of farmland directly impacted by RMDP under Alternative 3 are summarized in **Table 4.12-6**. When compared to the proposed Project, Alternative 3 would result in a 13.6-acre increase in direct impacts to important farmland. Impacts to important farmland would be increased due to the relocation of proposed infrastructure facilities. As discussed for the proposed Project, Alternative 3 would result in significant direct impacts to agricultural resources under Significance Threshold 1.

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**Table 4.12-6
Area of Important Farmland Affected by Alternative 3**

	Prime Farmland (acres)	Unique Farmland (acres)	Farmland of Statewide Importance (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)	TOTAL (acres)
Newhall Ranch Specific Plan Site						
RMDP Direct Impacts						
Bank Stabilization	17.1	19.4	2.5	16.2	1,015.0	1,070.1
Bridges and Road Crossings	0.3	1.3	0	0.6	19.8	22.0
Grade Control Structures	0.2	0.0	0	1.5	4.9	6.7
Debris and Water Detention Basins	32.7	9.7	0	1.3	68.1	111.7
Trails & Viewing Platforms	0.4	0.5	1.3	1.9	30.2	34.2
Storm Drains and Drainage Converted to Buried Storm Drain	2.7	1.2	0	0.1	20.8	24.9
Restoration	10.3	35.5	1.2	16.5	37.6	101.2
Other (Fill, Open Space Recreational, Haul Routes)	0	0.2	0.1	0	5.3	5.6
Subtotal RMDP Direct Impacts	63.6	67.8	5.1	38.1	1,201.7	1,376.2
SCP Direct Impacts						
Spineflower Preserves	17.1	0	0	0	126.4	143.5
RMDP/SCP Indirect Impacts						
Specific Plan Development	552.9	163.6	13.9	50.2	4,017.0	4,797.7
High Country SMA	0.1	0	0	0.7	3,906.4	3,907.1
River Corridor SMA	0.2	2.9	0	0.1	101.5	104.7
Salt Creek Conservation Area	0	0	0	0	1,331.0	1,331.0
Subtotal RMDP/SCP Indirect Impacts	553.2	166.6	13.9	50.9	9,355.9	10,140.5
Subtotal RMDP Area	633.9	234.4	19.0	89.0	10,684.0	11,660.3
Entrada Planning Area						
SCP Direct Impacts						
Spineflower Preserves	0	0	0	0	72.8	72.8
SCP Indirect Impacts						
Entrada Development	0	0	0	0	206.7	206.7
Subtotal Entrada	0	0	0	0	279.5	279.5
VCC Planning Area						
SCP Direct Impacts						
Spineflower Preserves	0	0	0	0	0	0
SCP Indirect Impacts						
VCC Development	14.8	34.8	5.4	4.1	256.8	301.1
Subtotal VCC	14.8	34.8	5.4	4.1	256.8	301.1
GRAND TOTAL	648.7	269.1	24.4	93.1	11,220.3	12,240.9

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The infrastructure improvements provided by Alternative 3 would be uses allowed by the existing "Specific Plan" zoning designation applied to the Specific Plan site. Therefore, the RMDP would not conflict with existing agricultural zoning or result in a significant impact under Significance Threshold 2. The infrastructure uses developed under Alternative 3 would not conflict with agricultural operations and would not result in a significant impact under Significance Threshold 3.

SCP Direct Impacts. The SCP established under Alternative 3 would create spineflower preserves on the Specific Plan site and the Entrada planning area. Approximately 17.1 acres of prime farmland and 126.4 acres of grazing land would be included within the boundaries of the spineflower preserves (see **Table 4.12-6**), the same as the proposed Project. Alternative 3 would result in a significant impact to agricultural resources under Significance Threshold 1.

The Specific Plan site, which has a zoning designation of "Specific Plan," allows a wide variety of land uses. The establishment of the spineflower preserves on the Specific Plan site under Alternative 3 would not conflict with an existing agricultural zoning designation, and not result in a significant impact under Significance Threshold 2.

The Entrada planning area currently is zoned for agricultural uses, and the applicant currently leases portions of the Entrada planning area for cattle grazing. The establishment of the Entrada preserve would preclude future grazing operations within the preserve, conflicting with the Entrada area's existing agricultural zoning. This conflict with the existing zoning would continue until such time as the zoning of the Entrada planning area is changed, as requested via development applications filed with Los Angeles County. Because establishment of a spineflower preserve on the Entrada planning area would conflict with the existing agricultural zoning for that area, including the precluding of existing and ongoing agricultural cattle grazing operations, the conflict is considered a significant project-related impact under Significance Threshold 2. This conflict would be temporary if the proposed Entrada development project is approved by Los Angeles County because such approval would result in a zone change; changing the existing agricultural zoning to a designation that is consistent with the proposed spineflower preserve land use designation. However, if a change in zoning is not approved by Los Angeles County, the proposed Entrada preserve would result in a significant conflict with the site's existing agricultural zoning and current use for cattle grazing. This conflict would continue until the site's zoning is changed to a designation that allows open space preserves or a similar type of use. This conflict is considered a significant unavoidable impact because it is beyond the control of the applicant to implement the zone change required to eliminate the existing zoning conflict.

The establishment of proposed spineflower preserves on the Specific Plan site and the Entrada planning area would not result in the development of habitable structures or other facilities that would conflict with agricultural operations located on or off the Project site. Therefore, the SCP would not result in a significant impact to agricultural resources under Significance Threshold 3.

4.12.6.3.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 3 would facilitate future development on the Specific Plan site. Under this alternative, however, the amount of residential and commercial development on the Specific Plan site would be incrementally reduced when compared to the proposed Project. Despite the reduction

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in Specific Plan-related development, this alternative would result in the long-term loss of commercial agricultural production on all of the designated farmland located on the Specific Plan site. The loss of existing commercial grazing operations in the Salt Creek conservation area also would be the same under Alternative 3 as the impacts of the proposed Project. Therefore, the indirect impacts to agricultural resources that would result from implementation of Alternative 3 would be the same as the impacts of the proposed Project, and would be significant under Significance Threshold 1.

Alternative 3 would facilitate the development of previously approved urban land uses, and those land uses would be consistent with the existing zoning of the Specific Plan site. Therefore, Alternative 3 would not result in a significant impact under Significance Threshold 2. The potential for new development on the Specific Plan site to conflict with agricultural operations located in Ventura County would be reduced to a less-than-significant level with implementation of previously adopted mitigation measures to provide land use buffers between new urban development and existing agricultural operations. Therefore, Alternative 3 would not result in significant impacts under Significance Threshold 3.

SCP Indirect Impacts. Implementation of Alternative 3 would facilitate development on the Specific Plan site. The indirect impacts to agricultural resources resulting from the development of the Specific Plan under Alternative 3 are described above as indirect impacts of implementing the proposed RMDP. Specifically, the indirect impacts would be the same as the indirect impacts of the RMDP, and would result in a significant indirect impact to agricultural resources under Significance Threshold 1.

Implementation of Alternative 3 would facilitate build-out of the previously approved VCC project. Build-out of the previously approved VCC project would result in the conversion of 14.8 acres of prime farmland, 34.8 acres of unique farmland, and 5.4 acres of farmland of statewide importance to nonagricultural uses. The conversion of 55.0 acres of prime, unique, and soils of statewide importance would be a significant impact under Significance Threshold 1. The VCC planning area is zoned for commercial-related uses; and, therefore, the conversion of agricultural lands to nonagricultural uses would not conflict with an existing agricultural zoning designation and would not result in a significant indirect impact under Significance Threshold 2. The commercial and other related land uses established on the VCC planning area would not conflict with farmland located in the Project region, such as farmland in Ventura County, which is five miles west of the VCC planning area. Therefore, implementation of Alternative 3 and the facilitated development in the VCC planning area would not result in significant indirect impacts under Significance Threshold 3.

Alternative 3 would result in the establishment of a spineflower preserve in the Entrada planning area, which would facilitate the development of new residential, commercial, and other land uses on a portion of the Entrada planning area. In the Entrada planning area, development under Alternative 3 would result in the conversion of 206.7 acres of grazing land to nonagricultural uses. The conversion of areas with grazing soils to a nonagricultural use is not a significant impact under Significance Threshold 1.

The Entrada planning area currently is zoned for agricultural uses and urban development facilitated by the SCP would be inconsistent with the agricultural zoning. This would result in a significant impact under the requirement of Threshold 2. The future development of urban uses in the Entrada planning

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area, however, could not occur until the zoning of the Entrada planning area is changed, as has been requested via development applications filed by the applicant with Los Angeles County. Therefore, as discussed for the proposed Project, the urban development facilitated by the SCP in the Entrada planning area could not conflict with existing agricultural zoning requirements, and would not result in a significant impact under Significance Threshold 2.

The residential, commercial, and other related land uses that could be developed in the Entrada planning area under Alternative 3 would not result in the establishment of land uses that would conflict with farmland located in the Project region, such as farmland in Ventura County, which is five miles west of the Entrada planning area. Therefore, implementation of Alternative 3 and the facilitated development in the Entrada planning area would not result in significant indirect impacts under Significance Threshold 3.

4.12.6.3.3 Secondary Impacts

RMDP Secondary Impacts. The conversion of designated farmland on the Specific Plan site to nonagricultural uses under Alternative 3 would be a site-specific impact that would not result the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the RMDP would not result in significant secondary impacts under Significance Thresholds 1 or 2.

Development of the Specific Plan under Alternative 3 would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. In addition, the Ventura County SOAR requirements and the Ventura County/City of Fillmore Greenbelt Ordinance would minimize the potential for the conversion of agricultural land in Ventura County near the Project site. Therefore, development of the Specific Plan under Alternative 3 would not result in significant environmental impacts to agricultural support operations in Ventura County under Significance Threshold 3.

Potential urban/agriculture land use conflicts that could affect agricultural resources in Ventura County near the Specific Plan site have been reduced to a less-than-significant level by mitigation measures previously adopted by Los Angeles County. (See **Subsection 4.12.6.2.2.**) With implementation of these mitigation measures, potentially significant impacts to agricultural resources in Ventura County that could result from development of the Specific Plan under Alternative 3 would be reduced to a less-than-significant level. Therefore, Alternative 3 would not result in significant secondary agricultural resource impacts under Significance Threshold 3.

SCP Secondary Impacts. Alternative 3 would facilitate future development on the Specific Plan site and the VCC and Entrada planning areas. Potential impacts to agricultural operations and resources located beyond the boundaries of the Specific Plan site that would result from build-out of the Specific Plan are evaluated in **Subsection 4.12.6.2.2.** That evaluation concluded that with the implementation of the previously approved land use buffer mitigation measures, potential impacts to agricultural resources located adjacent to the Specific Plan site would be reduced to a less-than-significant level. It also was concluded that Project-related effects to off-site agricultural support facilities (*e.g.*, packing facilities) and seasonal employment opportunities would not result in significant environmental impacts. Therefore, potential secondary agricultural resource impacts resulting from implementation of Alternative 3 and the

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subsequent development located on the Specific Plan site would not be significant under Significance Thresholds 1, 2, and 3.

The Entrada planning area presently is used for grazing and agricultural operations occur on the VCC planning area. The conversion of designated agricultural lands on the Entrada and VCC planning areas to nonagricultural uses would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the VCC and Entrada development facilitated by Alternative 3 would not result in significant secondary impacts under Significance Thresholds 1 or 2. Implementation of Alternative 3 and the resulting elimination of limited grazing operations on the Entrada planning area site would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. The establishment of urban uses on the Entrada and VCC planning areas would not conflict with remaining agricultural operations in Ventura County, which are approximately five miles west of these areas. Therefore, Alternative 3 would not result in significant secondary impacts under Significance Threshold 3.

Table 4.12-7 summarizes the potential for significant agricultural resources to be impacted as a result of the direct, indirect, and secondary impacts of Alternative 3.

Table 4.12-7				
Alternative 3 Direct/Indirect/Secondary Significant Impacts				
Aggregate Totals				
Potential for Impacts to Agricultural Soils				
Type of Impact	Prime (acres)	Unique (acres)	Statewide Importance (acres)	Total (acres)
Direct	80.7	67.8	5.1	153.6
Indirect	553.2	166.6	13.9	733.7
Secondary	0	0	0	0
Total	633.9	234.4	19.0	887.2

4.12.6.4 Impacts of Alternative 4 (Elimination of Planned Potrero Bridge and Addition of VCC Spineflower Preserve)

Alternative 4 would result in the elimination of additional infrastructure improvements included in the proposed RMDP, and increase the size of proposed spineflower preserves from 167.6 to 259.9 acres. Under this alternative, no additional development would be facilitated on the VCC planning area, and subsequent development on the Specific Plan site would be reduced. In total, Alternative 4 would facilitate the development of 21,846 residential dwelling units and approximately 5,933,000 square feet of nonresidential uses on the Specific Plan site and on a portion of the Entrada planning area.

4.12.6.4.1 Direct Impacts

RMDP Direct Impacts. Direct impacts to designated agricultural land would result from construction and operation of the facilities and improvements necessary to implement the RMDP component of Alternative 4. Implementation of Alternative 4 would result in the permanent conversion of 59.2 acres of

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prime farmland, 67.9 acres of unique farmland, and 5.1 acres of farmland of statewide importance to nonagricultural uses. In total, 132.2 acres of important farmland would be permanently converted to infrastructure-related uses to support future urban development. Acreages of farmland directly impacted by RMDP under Alternative 4 are summarized in **Table 4.12-8**. When compared to the proposed Project, Alternative 4 would increase direct impacts to important farmland by 9.4 acres. Impacts to important farmland would be increased due to the relocation of proposed infrastructure facilities. As discussed for the proposed Project, Alternative 4 would result in significant direct impacts to agricultural resources under Significance Threshold 1.

The infrastructure improvements provided by Alternative 4 would be uses allowed by the existing "Specific Plan" zoning designation that has been applied to the Specific Plan site. Therefore, similar to the proposed Project, the RMDP would not conflict with existing agricultural zoning or result in a significant impact under Significance Threshold 2. Also similar to the proposed Project, the infrastructure uses developed under Alternative 4 would not conflict with agricultural operations and would not result in a significant impact under Significance Threshold 3.

SCP Direct Impacts. The SCP established under Alternative 4 would create spineflower preserves on the Specific Plan site, the Entrada planning area, and the VCC planning area. Approximately 17.3 acres of prime farmland and 136.4 acres of grazing land would be included within the boundaries of the spineflower preserves (**Table 4.12-8**). When compared to the proposed SCP, Alternative 4 would increase the amount of prime farmland taken out of production by 0.2 acres. As described in the proposed Project, Alternative 4 would result in a significant impact to agricultural resources under Significance Threshold 1.

The Specific Plan site, which has a zoning designation of "Specific Plan," allows a wide variety of land uses. The establishment of the spineflower preserves on the Specific Plan site under Alternative 4 would not conflict with an existing agricultural zoning designation, and would not result in a significant impact under Significance Threshold 2.

The VCC planning area presently is zoned for commercial and related land uses and is vacant, although limited farming operations occur on the site. Establishment of a spineflower preserve on the VCC planning area under Alternative 4 would result in the conversion of 19.8 acres of designated grazing land to a nonagricultural use. Although the preserve would not be consistent with the existing commercial zoning of the VCC planning area, the preserve would not conflict with an agricultural zoning designation. Therefore, the establishment of a spineflower preserve on the VCC planning area would not result in a significant impact under Significance Threshold 2. The establishment of a spineflower preserve on the VCC site would not result in changes to existing environmental conditions that would have the potential to result in significant impacts to any off-site agricultural operations (Significance Threshold 3).

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**Table 4.12-8
Area of Important Farmland Affected by Alternative 4**

	Prime Farmland (acres)	Unique Farmland (acres)	Farmland of Statewide Importance (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)	TOTAL (acres)
Newhall Ranch Specific Plan Site						
RMDP Direct Impacts						
Bank Stabilization	11.3	19.4	2.5	13.2	995.6	1,042.0
Bridges and Road Crossings	0.3	1.3	0	0.4	18.9	20.8
Grade Control Structures	0.1	0	0	0.7	4.5	5.4
Debris and Water Detention Basins	34.2	9.8	0	1.3	68.9	114.2
Trails & Viewing Platforms	0.4	0.5	1.3	1.9	30.2	34.2
Storm Drains and Drainage Converted to Buried Storm Drain	2.7	1.2	0	0.1	20.8	24.8
Restoration	10.3	35.5	1.2	16.5	52.2	115.8
Other (Fill, Open Space Recreational, Haul Routes)	0	0.2	0.1	0.0	5.3	5.6
Subtotal RMDP Direct Impacts	59.2	67.9	5.1	34.0	1,196.5	1,362.7
SCP Direct Impacts						
Spineflower Preserves	17.3	0	0	0	136.4	153.6
RMDP/SCP Indirect Impacts						
Specific Plan Development	557.1	163.7	13.9	54.2	4,012.5	4,801.4
High Country SMA	0.1	0	0	0.7	3,906.4	3,907.1
River Corridor SMA	0.2	2.8	0	0.1	101.4	104.5
Salt Creek Conservation Area	0	0	0	0	1,331.0	1,331.0
Subtotal RMDP/SCP Indirect Impacts	557.4	166.5	13.9	55.0	9,351.2	10,144.0
Subtotal RMDP Area	633.9	234.4	19.0	89.0	10,684.0	11,660.3
Entrada Planning Area						
SCP Direct Impacts						
Spineflower Preserve	0	0	0	0	72.8	72.8
SCP Indirect Impacts						
Entrada Development	0	0	0	0	206.7	206.7
Subtotal Entrada	0	0	0	0	279.5	279.5
VCC Planning Area						
SCP Direct Impacts						
Spineflower Preserves	0	0	0	0	19.8	19.8
SCP Indirect Impacts						
VCC Development	14.8	34.8	4.1	0	236.9	290.6
Subtotal VCC	14.8	34.8	4.1	0	256.8	310.5
GRAND TOTAL	648.7	269.1	23.1	89.0	11,220.3	12,250.3

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The Entrada planning area currently is zoned for agricultural uses, and the applicant currently leases portions of the Entrada planning area for cattle grazing. The establishment of the Entrada preserve would preclude future grazing operations within the preserve, conflicting with the Entrada area's existing agricultural zoning. This conflict with the existing zoning would continue until such time as the zoning of the Entrada planning area is changed, as requested via development applications filed with Los Angeles County. Because establishment of a spineflower preserve on the Entrada planning area would conflict with the existing agricultural zoning for that area, including the precluding of existing and ongoing agricultural cattle grazing operations, the conflict is considered a significant project-related impact under Significance Threshold 2. This conflict would be temporary if the proposed Entrada development project is approved by Los Angeles County because such approval would result in a zone change; changing the existing agricultural zoning to a designation that is consistent with the proposed spineflower preserve land use designation. However, if a change in zoning is not approved by Los Angeles County, the proposed Entrada preserve would result in a significant conflict with the site's existing agricultural zoning and current use for cattle grazing. This conflict would continue until the site's zoning is changed to a designation that allows open space preserves or a similar type of use. This conflict is considered a significant unavoidable impact because it is beyond the control of the applicant to implement the zone change required to eliminate the existing zoning conflict.

The establishment of proposed spineflower preserves on the Specific Plan site and the VCC and Entrada planning areas would not result in the development of habitable structures or other facilities that would conflict with agricultural operations located on or off the Project site. Therefore, the SCP would not result in a significant impact to agricultural resources under Significance Threshold 3.

4.12.6.4.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 4 would facilitate future development on the Specific Plan site. Under this alternative, the amount of residential and commercial development on the Specific Plan site would be incrementally reduced when compared to the proposed Project. Despite the incremental reduction in Specific Plan-related development, Alternative 4 would result in the long-term loss of commercial agricultural production on all of the designated farmland on the Specific Plan site. The loss of existing commercial grazing operations in the Salt Creek conservation area also would be the same under Alternative 4 as the impacts of the proposed Project. Therefore, the indirect impacts to agricultural resources that would result from implementation of Alternative 4 would be the same as the impacts of the proposed Project, and would be significant under Significance Threshold 1.

Alternative 4 would facilitate the development of previously approved urban land uses, and those land uses would be consistent with the existing zoning of the Specific Plan site. Therefore, Alternative 4 would not result in a significant impact under Significance Threshold 2. The potential for new development on the Specific Plan site to conflict with agricultural operations located in Ventura County would be reduced to a less-than-significant level with implementation of previously adopted mitigation measures that provide land use buffers between new urban development and existing agricultural operations. Therefore, Alternative 4 would not result in significant impacts under Significance Threshold 3.

SCP Indirect Impacts. Implementation of Alternative 4 would facilitate development on the Specific Plan site. The indirect impacts to agricultural resources resulting from development of the Specific Plan

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under Alternative 4 are described above as indirect impacts of implementing the proposed RMDP. The indirect impacts of Alternative 4 in regard to facilitating development on the Specific Plan site would be the same as the indirect impacts of the RMDP and would result in a significant indirect impact to agricultural resources under Significance Threshold 1.

Alternative 4 would result in the establishment of a spineflower preserve in the Entrada planning area, which would facilitate the development of new residential, commercial, and other land uses on a portion of the Entrada planning area. In the Entrada planning area, development under Alternative 4 would result in the conversion of 206.7 acres of grazing land to nonagricultural uses. The conversion of areas with grazing soils to a nonagricultural use is not a significant impact under Significance Threshold 1.

The Entrada planning area currently is zoned for agricultural uses and urban development facilitated by the SCP would be inconsistent with the agricultural zoning. This would result in a significant impact under the requirement of Threshold 2. The future development of urban uses in the Entrada planning area, however, could not occur until the zoning of the Entrada planning area is changed, as has been requested via the development applications filed by the applicant with Los Angeles County. Therefore, the urban development that would be facilitated by the SCP in the Entrada planning area could not conflict with existing agricultural zoning requirements, and would not result in a significant impact under Significance Threshold 2.

The residential, commercial, and other related land uses that could be developed in the Entrada planning area under Alternative 4 would not result in the establishment of land uses that would conflict with farmland located in the Project region, such as farmland in Ventura County, which is five miles west of the Entrada planning area. Therefore, implementation of Alternative 4 and the facilitated development in the Entrada planning area would not result in significant indirect impacts under Significance Threshold 3.

The establishment of a spineflower preserve in the VCC planning area would preclude the future build-out of this area. Eliminating the potential for future development in the VCC planning area also would avoid significant agricultural soil conversion impacts that would occur with implementation of the proposed Project.

4.12.6.4.3 Secondary Impacts

RMDP Secondary Impacts. The conversion of designated farmland on the Specific Plan site to nonagricultural uses under Alternative 4 would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the RMDP would not result in significant secondary impacts under Significance Thresholds 1 or 2.

Development of the Specific Plan under Alternative 4 would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. In addition, the Ventura County SOAR requirements and the Ventura County/City of Fillmore Greenbelt Ordinance would minimize the potential for the conversion of agricultural land in Ventura County near the Project site. Therefore, development of the Specific Plan under Alternative 4 would not result in significant environmental impacts to agricultural support operations in Ventura County under Significance Threshold 3.

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Potential urban/agriculture land use conflicts that could affect agricultural resources in Ventura County near the Specific Plan site have been reduced to a less-than-significant level by mitigation measures previously adopted by Los Angeles County. (See **Subsection 4.12.6.2.2.**) With implementation of these mitigation measures, potentially significant impacts to agricultural resources in Ventura County that could result from the development of the Specific Plan under Alternative 4 would be reduced to a less-than-significant level. Therefore, development of the Specific Plan under Alternative 4 would not result in significant secondary agricultural resource impacts under Significance Threshold 3.

SCP Secondary Impacts. Alternative 4 would facilitate future development on the Specific Plan site and in the Entrada planning area. Potential impacts to agricultural operations and resources located beyond the boundaries of the Specific Plan site that would result from the build-out of the Specific Plan are evaluated in **Subsection 4.12.6.2.2.** That evaluation concluded that, with the implementation of previously adopted land use buffer mitigation measures, potential impacts to agricultural resources located adjacent to the Specific Plan site would be reduced to a less-than-significant level. It also was concluded that Project-related effects to off-site agricultural support facilities (*e.g.*, packing facilities) and seasonal employment opportunities would not result in significant environmental impacts. Therefore, potential secondary impacts to agricultural resources resulting from implementation of Alternative 4 and the subsequent development located on the Specific Plan site would not be significant under Significance Thresholds 1, 2, and 3.

The Entrada planning area presently is used for grazing. The conversion of designated agricultural lands on the Entrada planning area to nonagricultural uses would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the development facilitated by Alternative 4 would not result in significant secondary impacts under Significance Thresholds 1 or 2. Implementation of Alternative 4 and the resulting elimination of limited grazing operations on the Entrada planning area would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. The establishment of urban uses on the Entrada planning area would not conflict with remaining agricultural operations in Ventura County, which are approximately five miles west of the Project area. Therefore, Alternative 4 would not result in significant secondary impacts under Significance Threshold 3.

Table 4.12-9 summarizes the potential for significant agricultural resources to be impacted as a result of the direct, indirect, and secondary impacts of Alternative 4.

Table 4.12-9				
Alternative 4 Direct/Indirect/Secondary Significant Impacts				
Aggregate Totals				
Type of Impact	Potential for Impacts to Agricultural Soils			
	Prime (acres)	Unique (acres)	Statewide Importance (acres)	Total (acres)
Direct	76.5	67.9	5.1	149.5
Indirect	557.4	166.5	13.9	737.8
Secondary	0	0	0	0
Total	633.9	234.4	19.0	887.2

4.12.6.5 Impacts of Alternative 5 (Widen Tributary Drainages and Addition of VCC Spineflower Preserve)

Alternative 5 would result in the elimination of additional infrastructure improvements included in the proposed RMDP, and increase the size of proposed spineflower preserves from 167.6 to 338.6 acres. Under this alternative, no additional development would be facilitated on the VCC planning area, and subsequent development on the Specific Plan site would be reduced. In total, Alternative 5 would facilitate the development of 21,155 residential dwelling units and approximately 5,865,000 square feet of nonresidential uses on the Specific Plan site and on a portion of the Entrada planning area.

4.12.6.5.1 Direct Impacts

RMDP Direct Impacts. Direct impacts to designated agricultural land would result from construction and operation of the facilities and improvements necessary to implement the RMDP component of Alternative 5. Implementation of Alternative 5 would result in the permanent conversion of 63.3 acres of prime farmland, 67.6 acres of unique farmland, and 5.1 acres of farmland of statewide importance to nonagricultural uses. In total, 136.0 acres of important farmland would be converted permanently to infrastructure-related uses to support future urban development. Acreages of farmland directly impacted by the RMDP under Alternative 5 are summarized in **Table 4.12-10**. When compared to the proposed Project, Alternative 5 would increase direct impacts to important farmland by 13.1 acres. Impacts to important farmland would be increased due to the relocation of proposed infrastructure facilities. As discussed for the proposed Project, Alternative 5 would result in significant direct impacts to agricultural resources under Significance Threshold 1.

The infrastructure improvements provided by Alternative 5 would be uses allowed by the existing "Specific Plan" zoning designation applied to the Specific Plan site. Therefore, the RMDP would not conflict with existing agricultural zoning or result in a significant impact under Significance Threshold 2. The infrastructure uses developed under Alternative 5 would not conflict with agricultural operations and would not result in a significant impact under Significance Threshold 3.

SCP Direct Impacts. The SCP established under Alternative 5 would create spineflower preserves on the Specific Plan site, the Entrada planning area, and the VCC planning area. Approximately 17.3 acres of prime farmland and 161.1 acres of grazing land would be included within the boundaries of the spineflower preserves (see **Table 4.12-10**). When compared to the proposed SCP, Alternative 5 would increase the amount of prime farmland taken out of production by 0.2 of an acre. As described in the proposed Project, Alternative 5 would result in a significant impact to agricultural resources under Significance Threshold 1.

The Specific Plan site, which has a zoning designation of "Specific Plan," allows a wide variety of land uses. The establishment of the spineflower preserves on the Specific Plan site under Alternative 5 would not conflict with an existing agricultural zoning designation, and not result in a significant impact under Significance Threshold 2.

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**Table 4.12-10
Area of Important Farmland Affected by Alternative 5**

	Prime Farmland (acres)	Unique Farmland (acres)	Farmland of Statewide Importance (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)	TOTAL (acres)
Newhall Ranch Specific Plan Site						
<i>RMDP Direct Impacts</i>						
Bank Stabilization	17.3	23.3	2.5	21.4	1,020.3	1,084.8
Bridges and Road Crossings	0.3	2.5	0	0.5	31.1	34.5
Grade Control Structures	0.2	0	0	1.8	5.3	7.3
Debris and Water Detention Basins	32.4	9.5	0	1.7	69.4	112.9
Trails & Viewing Platforms	0.1	0.3	1.3	1.9	29.8	33.4
Storm Drains and Drainages Converted to Buried Storm Drains	2.7	1.3	0	0.1	20.7	24.7
Restoration	10.3	30.4	1.2	16.5	35.9	94.3
Other (Fill, Open Space Recreational, Haul Routes)	0	0.2	0.1	0	1.9	2.2
<i>Subtotal RMDP Direct Impacts</i>	63.3	67.6	5.1	44.0	1,214.2	1,394.2
<i>SCP Direct Impacts</i>						
Spineflower Preserves	17.3	0	0	0	161.1	178.4
<i>RMDP/SCP Indirect Impacts</i>						
Specific Plan Development	552.5	163.6	13.9	44.3	3,970.3	4,744.7
High Country SMA	0.1	0	0	0.7	3,906.4	9,907.1
River Corridor SMA	0.7	3.1	0	0.1	101.0	105.0
Salt Creek Conservation Area	0	0	0	0	1,331.0	1,459.8
<i>Subtotal RMDP/SCP Indirect Impacts</i>	553.3	166.8	13.9	45.1	9,308.7	10,087.7
Subtotal RMDP Area	633.9	234.4	19.0	89.0	10,684.0	11,660.3
Entrada Planning Area						
<i>SCP Direct Impacts</i>						
Spineflower Preserve	0	0	0	0	108.3	108.3
<i>SCP Indirect Impacts</i>						
Entrada Development	0	0	0	0	171.2	171.2
Subtotal Entrada	0	0	0	0	279.5	279.5
VCC Planning Area						
<i>SCP Direct Impacts</i>						
Spineflower Preserves	0	0	0	0	30.8	30.8
<i>SCP Indirect Impacts</i>						
VCC Development	14.8	34.8	4.1	0	225.9	279.6
Subtotal VCC	14.8	34.8	4.1	0	256.8	310.5
GRAND TOTAL	648.7	269.1	23.1	89.0	11,220.3	12,250.3

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The VCC planning area presently is zoned for commercial and related land uses and is vacant. Establishment of a spineflower preserve on the VCC planning area under Alternative 5 would result in the conversion of 30.8 acres of designated grazing land to a nonagricultural use. Although the preserve would not be consistent with the existing commercial zoning, the preserve would not conflict with an agricultural zoning designation. Therefore, the establishment of a spineflower preserve on the VCC planning area would not result in a significant impact under Significance Threshold 2. The establishment of a spineflower preserve on the VCC site would not result in changes to existing environmental conditions that would have the potential to result in significant impacts to any off-site agricultural operations (Significance Threshold 3).

The Entrada planning area currently is zoned for agricultural uses, and the applicant currently leases portions of the Entrada planning area for cattle grazing. The establishment of the Entrada preserve would preclude future grazing operations within the preserve, conflicting with the Entrada area's existing agricultural zoning. This conflict with the existing zoning would continue until such time as the zoning of the Entrada planning area is changed, as requested via development applications filed with Los Angeles County. Because establishment of a spineflower preserve on the Entrada planning area would conflict with the existing agricultural zoning for that area, including the precluding of existing and ongoing agricultural cattle grazing operations, the conflict is considered a significant project-related impact under Significance Threshold 2. This conflict would be temporary if the proposed Entrada development project is approved by Los Angeles County because such approval would result in a zone change; changing the existing agricultural zoning to a designation that is consistent with the proposed spineflower preserve land use designation. However, if a change in zoning is not approved by Los Angeles County, the proposed Entrada preserve would result in a significant conflict with the site's existing agricultural zoning and current use for cattle grazing. This conflict would continue until the site's zoning is changed to a designation that allows open space preserves or a similar type of use. This conflict is considered a significant unavoidable impact because it is beyond the control of the applicant to implement the zone change required to eliminate the existing zoning conflict.

The establishment of proposed spineflower preserves on the Specific Plan site and the VCC and Entrada planning areas would not result in the development of habitable structures or other facilities that would conflict with agricultural operations located on or off the Project site. Therefore, the SCP would not result in a significant impact to agricultural resources under Significance Threshold 3.

4.12.6.5.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 5 would facilitate future development on the Specific Plan site. Under this alternative, the amount of residential and commercial development on the Specific Plan site would be incrementally reduced when compared to the proposed Project. Despite the incremental reduction in Specific Plan-related development, Alternative 5 would result in the long-term loss of commercial agricultural production on all of the designated farmland on the Specific Plan site. The loss of existing commercial grazing operations in the Salt Creek conservation area would be the same under Alternative 5 as the impacts of the proposed Project. Therefore, the indirect impacts to agricultural resources that would result from implementation of Alternative 5 would be the same as the impacts of the proposed Project, and would be significant under Significance Threshold 1.

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Alternative 5 would facilitate the development of previously approved urban land uses, and those land uses would be consistent with the existing zoning of the Specific Plan site. Therefore, Alternative 5 would not result in a significant impact under Significance Threshold 2. The potential for new development on the Specific Plan site to conflict with agricultural operations located in Ventura County would be reduced to a less-than-significant level with the implementation of previously adopted mitigation measures to provide land use buffers between new urban development and existing agricultural operations. Therefore, Alternative 5 would not result in significant impacts under Significance Threshold 3.

SCP Indirect Impacts. Implementation of Alternative 5 would facilitate development on the Specific Plan site. The indirect impacts to agricultural resources resulting from development of the Specific Plan under Alternative 5 are described above as indirect impacts of implementing the proposed RMDP. The indirect impacts of Alternative 5 in regard to facilitating development on the Specific Plan site would be the same as the indirect impacts of the RMDP and would result in a significant indirect impact to agricultural resources under Significance Threshold 1.

Alternative 5 would result in the establishment of a spineflower preserve in the Entrada planning area, which would facilitate the development of new residential, commercial, and other land uses on a portion of the Entrada planning area. In the Entrada planning area, development under Alternative 5 would result in the conversion of 171.2 acres of grazing land to nonagricultural uses. The conversion of areas with grazing soils to a nonagricultural use is not a significant impact under Significance Threshold 1.

The Entrada planning area currently is zoned for agricultural uses and urban development facilitated by the SCP would be inconsistent with the agricultural zoning. This would result in a significant impact under the requirements of Threshold 2. The future development of urban uses in the Entrada planning area, however, could not occur until the zoning of the Entrada planning area is changed, as has been requested via the development applications filed by the applicant with Los Angeles County. Therefore, the urban development that would be facilitated by the SCP in the Entrada planning area could not conflict with existing agricultural zoning requirements, and would not result in a significant impact under Significance Threshold 2.

The residential, commercial, and other related land uses that could be developed in the Entrada planning area under Alternative 5 would not conflict with farmland located in the Project region, such as farmland in Ventura County, which is five miles west of the Entrada planning area. Therefore, implementation of Alternative 5 and the facilitated development in the Entrada planning area would not result in significant indirect impacts under Significance Threshold 3.

The establishment of a spineflower preserve in the VCC planning area would preclude the future build-out of this area. Eliminating the potential for future development in the VCC planning area also would avoid significant agricultural soil conversion impacts that would occur with implementation of the proposed Project.

4.12.6.5.3 Secondary Impacts

RMDP Secondary Impacts. The conversion of designated farmland on the Specific Plan site to nonagricultural uses under Alternative 5 would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the RMDP would not result in significant secondary impacts under Significance Thresholds 1 or 2.

Development of the Specific Plan under Alternative 5 would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. In addition, the Ventura County SOAR requirements and the Ventura County/City of Fillmore Greenbelt Ordinance would minimize the potential for the conversion of agricultural land in Ventura County near the Project site. Therefore, development of the Specific Plan under Alternative 5 would not result in significant environmental impacts to agricultural support operations in Ventura County under Significance Threshold 3.

Potential urban/agriculture land use conflicts that could affect agricultural resources in Ventura County near the Specific Plan site have been reduced to a less-than-significant level by mitigation measures previously adopted by Los Angeles County (see **Subsection 4.12.6.2.2**). With implementation of those mitigation measures, potentially significant impacts to agricultural resources in Ventura County that could result from the development of the Specific Plan under Alternative 5 would be reduced to a less-than-significant level. Therefore, Alternative 5 would not result in significant secondary agricultural resource impacts under Significance Threshold 3.

SCP Secondary Impacts. Alternative 5 would facilitate future development on the Specific Plan site and in the Entrada planning area. Potential impacts to agricultural operations and resources located beyond the boundaries of the Specific Plan site that would result from the build-out of the Specific Plan are evaluated in **Subsection 4.12.6.2.2**. That evaluation concluded that with implementation of previously adopted land use buffer mitigation measures, potential impacts to agricultural resources located adjacent to the Specific Plan site would be reduced to a less-than-significant level. It was also concluded that Project-related effects on off-site agricultural support facilities (*e.g.*, packing facilities) and seasonal employment opportunities would not result in significant environmental impacts. Therefore, potential secondary agricultural resource impacts resulting from the implementation of Alternative 5 and the subsequent development located on the Specific Plan site would not be significant under Significance Thresholds 1, 2, and 3.

The Entrada planning area presently is used for grazing. The conversion of designated agricultural lands on the Entrada planning area to nonagricultural uses would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the Entrada development facilitated by the Alternative 5 SCP would not result in significant secondary impacts under Significance Thresholds 1 or 2. Implementation of Alternative 5 and the resulting elimination of limited grazing operations on the Entrada planning area would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. The establishment of urban uses on the Entrada planning area would not conflict with remaining agricultural operations in Ventura County, which are approximately five miles

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west of the Project area. Therefore, Alternative 5 would not result in significant secondary impacts under Significance Threshold 3.

Table 4.12-11 summarizes the potential for significant agricultural resources to be impacted as a result of the direct, indirect, and secondary impacts of Alternative 5.

Table 4.12-11				
Alternative 5 Direct/Indirect/Secondary Significant Impacts				
Aggregate Totals				
Type of Impact	Potential for Impacts to Agricultural Soils			
	Prime (acres)	Unique (acres)	Statewide Importance (acres)	Total (acres)
Direct	80.6	67.6	5.1	153.2
Indirect	533.3	166.8	13.9	734.0
Secondary	0.0	0.0	0.0	0.0
Total	633.9	234.4	19.0	887.2

4.12.6.6 Impacts of Alternative 6 (Elimination of Planned Commerce Center Drive Bridge and Maximum Spineflower Expansion/Connectivity)

Alternative 6 would result in additional reductions in the infrastructure improvements provided by the proposed RMDP when compared to the proposed Project, and increase the size of proposed spineflower preserves from 167.6 to 891.2 acres. Under this alternative, no additional development would be facilitated on the VCC planning area, and subsequent development on the Specific Plan site would be reduced. In total, Alternative 6 would facilitate the development of 20,212 residential dwelling units and approximately 5,784,000 square feet of nonresidential uses on the Specific Plan site and on a portion of the Entrada planning area.

4.12.6.6.1 Direct Impacts

RMDP Direct Impacts. Direct impacts to designated agricultural land would result from construction and operation of the facilities and improvements necessary to implement the RMDP component of Alternative 6. Implementation of Alternative 6 would result in the permanent conversion of 46.3 acres of prime farmland, 68.2 acres of unique farmland, and 5.1 acres of farmland of statewide importance to nonagricultural uses. In total, 119.6 acres of important farmland would be converted permanently to infrastructure-related uses to support future urban development. Acreages of farmland directly impacted by RMDP under Alternative 6 are summarized in **Table 4.12-12**. When compared to the proposed Project, Alternative 6 would reduce direct impacts to important farmland by 3.2 acres. Although the impacts are reduced compared to the proposed Project, Alternative 6 would still result in significant direct impacts to agricultural resources under Significance Threshold 1.

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**Table 4.12-12
Area of Important Farmland Affected by Alternative 6**

	Prime Farmland (acres)	Unique Farmland (acres)	Farmland of Statewide Importance (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)	TOTAL (acres)
Newhall Ranch Specific Plan Site						
RMDP Direct Impacts						
Bank Stabilization	17.7	22.8	2.5	16.2	1,019.6	1,078.8
Bridges and Road Crossings	0.4	2.8	0	0.6	24.7	28.5
Grade Control Structures	0.3	0	0	1.5	5.4	7.2
Debris and Water Detention Basins	15.2	9.5	0	1.2	54.2	80.2
Trails & Viewing Platforms	0.3	0.6	1.3	1.9	30.1	34.2
Storm Drains and Drainage Converted to Buried Storm Drain	2.0	1.3	0	0.1	15.3	18.6
Restoration	10.3	31.1	1.2	16.5	36.4	95.5
Other (Fill, Open Space Recreational, Haul Routes)	0	0.2	0.1	0.0	1.9	2.2
Subtotal RMDP Direct Impacts	46.3	68.2	5.1	38.0	1,187.5	1,345.1
SCP Direct Impacts						
Spineflower Preserves	48.0	3.6	0	0	620.8	672.4
RMDP/SCP Indirect Impacts						
Specific Plan Development	538.9	159.7	13.9	50.3	3,696.5	4,459.3
High Country SMA	0.1	0	0	0.7	3,799.6	3,800.4
River Corridor SMA	0.7	3.1	0	0.1	49.4	53.4
Salt Creek Conservation Area	0	0	0	0	1,330.1	1,330.1
Subtotal RMDP/SCP Indirect Impacts	539.7	162.9	13.9	51.0	8,875.7	9,643.2
Subtotal RMDP Area	633.9	234.8	19.0	89.0	10,684.0	11,660.7
Entrada Planning Area						
SCP Direct Impacts						
Spineflower Preserve	0	0	0	0	142.9	142.9
SCP Indirect Impacts						
Entrada Development	0	0	0	0	136.6	136.6
Subtotal Entrada	0	0	0	0	279.5	279.5
VCC Planning Area						
SCP Direct Impacts						
Spineflower Preserves	0	0	0	0	30.8	30.8
SCP Indirect Impacts						
VCC Development	14.8	34.8	4.1	0	225.9	279.6
Subtotal VCC	14.8	34.8	4.1	0	256.8	310.5
GRAND TOTAL	648.8	269.5	23.1	89.0	11,220.3	12,250.7

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The infrastructure improvements provided by Alternative 6 would be uses allowed by the existing "Specific Plan" zoning designation applied to the Specific Plan site. Therefore, the RMDP would not conflict with existing agricultural zoning or result in a significant impact under Significance Threshold 2. The infrastructure uses developed under Alternative 6 would not conflict with agricultural operations and would not result in a significant impact under Significance Threshold 3.

SCP Direct Impacts. The SCP established under Alternative 6 would create spineflower preserves on the Specific Plan site, the Entrada planning area, and the VCC planning area. Approximately 48.0 acres of prime farmland, 3.6 acres of unique farmland, and 620.8 acres of grazing land would be included within the boundaries of the spineflower preserves (see **Table 4.12-12**). When compared to the proposed SCP, Alternative 6 would increase the amount of prime farmland taken out of production by 34.5 acres. As described for the proposed Project, Alternative 6 would result in a significant impact to agricultural resources under Significance Threshold 1.

The Specific Plan site, which has a zoning designation of "Specific Plan," allows a wide variety of land uses. The establishment of the spineflower preserves on the Specific Plan site under Alternative 6 would not conflict with an existing agricultural zoning designation, and not result in a significant impact under Significance Threshold 2.

The VCC planning area presently is zoned for commercial and related land uses and is vacant. Establishment of a spineflower preserve on the VCC planning area under Alternative 6 would result in the conversion of 30.8 acres of designated grazing land to a nonagricultural use. Although the preserve would not be consistent with the existing commercial zoning, the preserve would not conflict with an agricultural zoning designation. Therefore, the establishment of a spineflower preserve on the VCC planning area would not result in a significant impact under Significance Threshold 2. The establishment of a spineflower preserve on the VCC site would not result in changes to existing environmental conditions that would have the potential to result in significant impacts to any off-site agricultural operations (Significance Threshold 3).

The Entrada planning area currently is zoned for agricultural uses, and the applicant currently leases portions of the Entrada planning area for cattle grazing. The establishment of the Entrada preserve would preclude future grazing operations within the preserve, conflicting with the Entrada area's existing agricultural zoning. This conflict with the existing zoning would continue until such time as the zoning of the Entrada planning area is changed, as requested via development applications filed with Los Angeles County. Because establishment of a spineflower preserve on the Entrada planning area would conflict with the existing agricultural zoning for that area, including the precluding of existing and ongoing agricultural cattle grazing operations, the conflict is considered a significant project-related impact under Significance Threshold 2. This conflict would be temporary if the proposed Entrada development project is approved by Los Angeles County because such approval would result in a zone change; changing the existing agricultural zoning to a designation that is consistent with the proposed spineflower preserve land use designation. However, if a change in zoning is not approved by Los Angeles County, the proposed Entrada preserve would result in a significant conflict with the site's existing agricultural zoning and current use for cattle grazing. This conflict would continue until the site's zoning is changed to a designation that allows open space preserves or a similar type of use. This conflict is considered a significant unavoidable impact because it is beyond the control of the applicant to implement the zone change required to eliminate the existing zoning conflict.

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The establishment of proposed spineflower preserves on the Specific Plan site and the VCC and Entrada planning areas would not result in the development of habitable structures or other facilities that would conflict with agricultural operations located on or off the Project site. Therefore, the SCP would not result in a significant impact to agricultural resources under Significance Threshold 3.

4.12.6.6.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 6 would facilitate future development on the Specific Plan site. Under this alternative, the amount of residential and commercial development on the Specific Plan site would be reduced when compared to the proposed Project. Despite the reduction in Specific Plan-related development, this alternative would result in the long-term loss of commercial agricultural production on all of the designated farmland on the Specific Plan site. The loss of existing commercial grazing operations in the Salt Creek conservation area would also be the same under Alternative 6 as the proposed Project. Therefore, the indirect impacts to agricultural resources that would result from the implementation of Alternative 6 would be the same as the impacts of the proposed Project, and would be significant under Significance Threshold 1.

Alternative 6 would facilitate the development of previously approved urban land uses, and those land uses would be consistent with the existing zoning of the Specific Plan site. Therefore, Alternative 6 would not result in a significant impact under Significance Threshold 2. The potential for new development on the Specific Plan site to conflict with agricultural operations located in Ventura County would be reduced to a less-than-significant level with the implementation of previously adopted mitigation measures to provide land use buffers between new urban development and existing agricultural operations. Therefore, Alternative 6 would not result in significant impacts under Significance Threshold 3.

SCP Indirect Impacts. Implementation of Alternative 6 would facilitate development on the Specific Plan site. The indirect impacts to agricultural resources resulting from development of the Specific Plan under Alternative 6 are described above as indirect impacts of implementing the proposed RMDP. The indirect impacts of Alternative 6 in regard to facilitating development on the Specific Plan site would be the same as the indirect impacts of the RMDP and would result in a significant indirect impact to agricultural resources under Significance Threshold 1.

Alternative 6 would result in the establishment of a spineflower preserve in the Entrada planning area, which would facilitate the development of new residential, commercial, and other land uses on a portion of the Entrada planning area. In the Entrada planning area, development under Alternative 6 would result in the conversion of 136.6 acres of grazing land to nonagricultural uses. The conversion of areas with grazing soils to a nonagricultural use is not a significant impact under Significance Threshold 1.

The Entrada planning area currently is zoned for agricultural uses and urban development facilitated by the SCP would be inconsistent with the agricultural zoning. This would result in a significant impact under the requirements of Threshold 2. The future development of urban uses in the Entrada planning area, however, could not occur until the zoning of the Entrada planning area is changed, as has been requested via the development applications filed by the applicant with Los Angeles County. Therefore, the urban development that would be facilitated by the SCP in the Entrada planning area could not

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conflict with existing agricultural zoning requirements, and would not result in a significant impact under Significance Threshold 2.

The residential, commercial, and other related land uses that could be developed in the Entrada planning area under Alternative 6 would not result in the establishment of land uses that would have the potential to conflict with farmland located in the Project region, such as farmland in Ventura County, which is five miles west of the Entrada planning area. Therefore, implementation of Alternative 6 and the facilitated development in the Entrada planning area would not result in significant indirect impacts under Significance Threshold 3.

The establishment of a spineflower preserve in the VCC planning area would preclude the future build-out of this area. Eliminating the potential for future development in the VCC planning area also would avoid significant agricultural soil conversion impacts that would occur with implementation of the proposed Project.

4.12.6.6.3 Secondary Impacts

RMDP Secondary Impacts. The conversion of designated farmland on the Specific Plan site to nonagricultural uses under Alternative 6 would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the RMDP would not result in significant secondary impacts under Significance Thresholds 1 or 2.

Development of the Specific Plan under Alternative 6 would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. In addition, the Ventura County SOAR requirements and the Ventura County/City of Fillmore Greenbelt Ordinance would minimize the potential for the conversion of agricultural land in Ventura County near the Project site. Therefore, development of the Specific Plan under Alternative 6 would not result in significant environmental impacts to agricultural support operations in Ventura County under Significance Threshold 3.

Potential urban/agriculture land use conflicts that could affect agricultural resources in Ventura County near the Specific Plan site have been reduced to a less-than-significant level by mitigation measures previously adopted by Los Angeles County (see **Subsection 4.12.6.2.2**). With implementation of those mitigation measures, potentially significant impacts to agricultural resources in Ventura County that could result from development of the Specific Plan under Alternative 6 would be reduced to a less-than-significant level. Therefore, Alternative 6 would not result in significant secondary agricultural resource impacts under Significance Threshold 3.

SCP Secondary Impacts. Alternative 6 would facilitate future development on the Specific Plan site and in the Entrada planning area. Potential impacts to agricultural operations and resources located beyond the boundaries of the Specific Plan site that would result from the build-out of the Specific Plan are evaluated in **Subsection 4.12.6.2.2**. That evaluation concluded that with the implementation of previously adopted land use buffer mitigation measures, potential impacts to agricultural resources located adjacent to the Specific Plan site would be reduced to a less-than-significant level. It also was concluded that Project-related effects on off-site agricultural support facilities (*e.g.*, packing facilities) and

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seasonal employment opportunities would not result in significant environmental impacts. Therefore, potential secondary agricultural resource impacts resulting from the implementation of Alternative 6 and the subsequent development located on the Specific Plan site would not be significant under Significance Thresholds 1, 2, and 3.

The Entrada planning area presently is used for grazing. The conversion of designated agricultural lands on the Entrada planning area to nonagricultural uses would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the Entrada development facilitated by Alternative 6 would not result in significant secondary impacts under Significance Thresholds 1 or 2. Implementation of Alternative 6 and the resulting elimination of limited grazing operations on the Entrada planning area site would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. The establishment of urban uses on the Entrada planning area would not conflict with remaining agricultural operations in Ventura County, which are approximately five miles west of the Project area. Therefore, Alternative 6 would not result in significant secondary impacts under Significance Threshold 3.

Table 4.12-13 summarizes the potential for significant agricultural resources to be impacted as a result of the direct, indirect, and secondary impacts of Alternative 6.

Table 4.12-13				
Alternative 6 Direct/Indirect/Secondary Significant Impacts				
Aggregate Totals				
Type of Impact	Potential for Impacts to Agricultural Soils			
	Prime (acres)	Unique (acres)	Statewide Importance (acres)	Total (acres)
Direct	94.3	71.9	5.1	171.2
Indirect	539.7	162.9	13.9	716.4
Secondary	0.0	0.0	0.0	0.0
Total	633.9	234.8	19.0	887.7

4.12.6.7 Impacts of Alternative 7 (Avoidance of 100-Year Floodplain, Elimination of Two Planned Bridges, and Avoidance of Spineflower)

Alternative 7 would result in a substantial reduction in the infrastructure improvements provided by the proposed RMDP when compared to the proposed Project, and increase the size of proposed spineflower preserves from 167.6 to 660.6 acres. Under this alternative, no additional development would be facilitated on the VCC planning area, and subsequent development on the Specific Plan site would be reduced. In total, Alternative 7 would facilitate the development of 17,323 residential dwelling units and approximately 3,815,000 square feet of nonresidential uses on the Specific Plan site and on a portion of the Entrada planning area.

4.12.6.7.1 Direct Impacts

RMDP Direct Impacts. Direct impacts to designated agricultural land would result from construction and operation of the facilities and improvements necessary to implement the RMDP component of Alternative 7. Implementation of Alternative 7 would result in the permanent conversion of 99.0 acres of prime farmland, 181.1 acres of unique farmland, and 18.4 acres of farmland of statewide importance to nonagricultural uses. In total, 298.5 acres of important farmland would be converted permanently to infrastructure-related uses to support future urban development. Acreages of farmland directly impacted by the RMDP under Alternative 7 are summarized in **Table 4.12-14**. When compared to the proposed Project, Alternative 7 would increase direct impacts to designated farmland by 175.7 acres. Impacts to important farmland would be increased due to the relocation of proposed infrastructure facilities. As described for the proposed Project, Alternative 7 would result in significant direct impacts to agricultural resources under Significance Threshold 1.

The infrastructure improvements provided by Alternative 7 would be uses allowed by the existing "Specific Plan" zoning designation applied to the Specific Plan site. Therefore, the RMDP would not conflict with existing agricultural zoning or result in a significant impact under Significance Threshold 2. The infrastructure uses developed under Alternative 7 would not conflict with agricultural operations and would not result in a significant impact under Significance Threshold 3.

SCP Direct Impacts. The SCP established under Alternative 7 would create spineflower preserves on the Specific Plan site, the Entrada planning area, and the VCC planning area. Approximately 58.4 acres of prime farmland, 7.1 acres of unique farmland, and 395.8 acres of grazing land would be included within the boundaries of the spineflower preserves (see **Table 4.12-14**). When compared to the proposed SCP, Alternative 7 would increase the amount of important farmland taken out of production by 48.3 acres. Alternative 7 would result in a significant impact to agricultural resources under Significance Threshold 1.

The Specific Plan site, which has a zoning designation of "Specific Plan," allows a wide variety of land uses. The establishment of the spineflower preserves on the Specific Plan site under Alternative 7 would not conflict with an existing agricultural zoning designation, and would not result in a significant impact under Significance Threshold 2.

The VCC planning area presently is zoned for commercial and related land uses, and is vacant. Establishment of a spineflower preserve on the VCC planning area under Alternative 7 would result in the conversion of 37.6 acres of designated grazing land to a nonagricultural use. Although the preserve would not be consistent with the existing commercial zoning, the preserve would not conflict with an agricultural zoning designation. Therefore, the establishment of a spineflower preserve on the VCC planning area would not result in a significant impact under Significance Threshold 2. The establishment of a spineflower preserve on the VCC site would not result in changes to existing environmental conditions that would have the potential to result in significant impacts to any off-site agricultural operations (Significance Threshold 3).

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**Table 4.12-14
Area of Important Farmland Affected by Alternative 7**

Type	Prime Farmland (acres)	Unique Farmland (acres)	Farmland of Statewide Importance (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)	TOTAL (acres)
Newhall Ranch Specific Plan Site						
RMDP Direct Impacts						
Bank Stabilization	29.0	10.4	0.9	47.0	1,189.2	1,276.5
Bridges and Road Crossings	1.4	4.4	0	2.3	18.2	26.3
Grade Control Structures	0	0	0	0	0	0
Debris and Water Detention Basins	9.9	0.5	0	0	31.2	41.7
Trails & Viewing Platforms	0.4	0.5	1.3	1.9	30.8	34.7
Storm Drains and Drainages Converted to Buried Storm Drains	2.1	0.2	0	0	6.2	8.5
Restoration	56.2	165.0	16.0	16.5	57.3	311.1
Other (Fill, Open Space Recreational, Haul Routes)	0	0	0.3	0	5.4	1,698.9
Subtotal RMDP Direct Impacts	99.0	181.1	18.4	67.8	1,338.3	3,397.7
SCP Direct Impacts						
Spineflower Preserves	58.4	7.1	0	0	395.8	461.2
RMDP/SCP Indirect Impacts						
Specific Plan Development	475.2	46.1	0.6	20.5	3,624.6	4,166.9
High Country SMA	0.1	0	0	0.7	3,906.4	3,907.1
River Corridor SMA	1.3	0.5	0	0.1	88.9	90.8
Salt Creek Conservation Area	0	0	0	0	1,330.1	1,330.1
Subtotal RMDP/SCP Indirect Impacts	476.6	46.6	0.6	21.3	8,950.0	9,495.0
Subtotal Specific Plan Site	633.9	234.8	19.0	89.0	10,684.0	13,353.9
Entrada Planning Area						
SCP Direct Impacts						
Spineflower Preserves	0	0	0	0	65.8	65.8
SCP Indirect Impacts						
Entrada Development	0	0	0	0	213.8	213.8
Subtotal Entrada	0	0	0	0	279.5	279.5
VCC Planning Area						
SCP Direct Impacts						
Spineflower Preserves	0	0	0	0	37.6	37.6
SCP Indirect Impacts						
VCC Development	14.8	34.8	4.1	0	219.2	272.9
Subtotal VCC	14.8	34.8	4.1	0	256.8	310.5
GRAND TOTAL	648.8	269.5	23.1	89.0	11,220.3	13,943.9

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The Entrada planning area currently is zoned for agricultural uses, and the applicant currently leases portions of the Entrada planning area for cattle grazing. The establishment of the Entrada preserve would preclude future grazing operations within the preserve, conflicting with the Entrada area's existing agricultural zoning. This conflict with the existing zoning would continue until such time as the zoning of the Entrada planning area is changed, as requested via development applications filed with Los Angeles County. Because establishment of a spineflower preserve on the Entrada planning area would conflict with the existing agricultural zoning for that area, including the precluding of existing and ongoing agricultural cattle grazing operations, the conflict is considered a significant project-related impact under Significance Threshold 2. This conflict would be temporary if the proposed Entrada development project is approved by Los Angeles County because such approval would result in a zone change; changing the existing agricultural zoning to a designation that is consistent with the proposed spineflower preserve land use designation. However, if a change in zoning is not approved by Los Angeles County, the proposed Entrada preserve would result in a significant conflict with the site's existing agricultural zoning and current use for cattle grazing. This conflict would continue until the site's zoning is changed to a designation that allows open space preserves or a similar type of use. This conflict is considered a significant unavoidable impact because it is beyond the control of the applicant to implement the zone change required to eliminate the existing zoning conflict.

The establishment of proposed spineflower preserves on the Specific Plan site and the VCC and Entrada planning areas would not result in the development of habitable structures or other facilities that would conflict with agricultural operations located on or off the Project site. Therefore, the SCP would not result in a significant impact to agricultural resources under Significance Threshold 3.

4.12.6.7.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 7 would facilitate future development on the Specific Plan site. Under this alternative, the amount of residential and commercial development on the Specific Plan site would be reduced when compared to the proposed Project. Despite the reduction in Specific Plan-related development, Alternative 7 would result in the long-term loss of commercial agricultural production on all of the designated farmland on the Specific Plan site. The loss of existing commercial grazing operations in the Salt Creek conservation area also would be the same under Alternative 7 as under the proposed Project. Therefore, the indirect impacts to agricultural resources that would result from implementation of Alternative 7 would be similar to the impacts of the proposed Project, and would be significant under Significance Threshold 1.

Alternative 7 would facilitate the development of previously approved urban land uses, and those land uses would be consistent with the existing zoning of the Specific Plan site. Therefore, Alternative 7 would not result in a significant impact under Significance Threshold 2. The potential for new development on the Specific Plan site to conflict with agricultural operations located in Ventura County would be reduced to a less-than-significant level with the implementation of previously adopted mitigation measures that provide land use buffers between new urban development and existing agricultural operations. Therefore, Alternative 7 would not result in significant impacts under Significance Threshold 3.

SCP Indirect Impacts. Implementation of Alternative 7 would facilitate development on the Specific Plan site. The indirect impacts to agricultural resources resulting from development of the Specific Plan

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under Alternative 7 are described above as indirect impacts of implementing the proposed RMDP. The indirect impacts of Alternative 7 in regard to facilitating development on the Specific Plan site would be the same as the indirect impacts of the RMDP and would result in a significant indirect impact to agricultural resources under Significance Threshold 1.

Alternative 7 would result in the establishment of a spineflower preserve in the Entrada planning area, which would facilitate the development of new residential, commercial, and other land uses on a portion of the Entrada planning area. In the Entrada planning area, development under Alternative 7 would result in the conversion of 213.8 acres of grazing land to non-agricultural uses. The conversion of areas with grazing soils to a nonagricultural use is not a significant impact under Significance Threshold 1.

The Entrada planning area currently is zoned for agricultural uses and urban development facilitated by the SCP would be inconsistent with the agricultural zoning. This would result in a significant impact under the requirements of Threshold 2. The future development of urban uses in the Entrada planning area, however, could not occur until the zoning of the Entrada planning area is changed, as has been requested via the development applications filed by the applicant with Los Angeles County. Therefore, the urban development that would be facilitated by the SCP in the Entrada planning area could not conflict with existing agricultural zoning requirements, and would not result in a significant impact under Significance Threshold 2.

The residential, commercial, and other related land uses that could be developed in the Entrada planning area under Alternative 7 would not result in the establishment of land uses that would conflict with farmland located in the Project region, such as farmland in Ventura County, which is five miles west of the Entrada planning area. Therefore, implementation of Alternative 7 and the facilitated development in the Entrada planning area would not result in significant indirect impacts under Significance Threshold 3.

The establishment of a spineflower preserve in the VCC planning area would preclude the future build-out of this area. Eliminating the potential for future development in the VCC planning area also would avoid significant agricultural soil conversion impacts that would occur with implementation of the proposed Project.

4.12.6.7.3 Secondary Impacts

RMDP Secondary Impacts. The conversion of designated farmland on the Specific Plan site to nonagricultural uses under Alternative 7 would be a site-specific impact that would not result the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the RMDP would not result in significant secondary impacts under Significance Thresholds 1 or 2.

Development of the Specific Plan under Alternative 7 would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. In addition, the Ventura County SOAR requirements and the Ventura County/City of Fillmore Greenbelt Ordinance would minimize the potential for the conversion of agricultural land in Ventura County near the Project site. Therefore, development of the Specific Plan under Alternative 7 would not result in significant environmental impacts to agricultural support operations in Ventura County under Significance Threshold 3.

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Potential urban/agriculture land use conflicts that could affect agricultural resources in Ventura County near the Specific Plan site have been reduced to a less-than-significant level by mitigation measures previously adopted by Los Angeles County (see **Subsection 4.12.6.2.2**). With implementation of those mitigation measures, potentially significant impacts to agricultural resources in Ventura County that could result from the development of the Specific Plan under Alternative 7 would be reduced to a less-than-significant level. Therefore, Alternative 7 would not result in significant secondary agricultural resource impacts under Significance Threshold 3.

SCP Secondary Impacts. Alternative 7 would facilitate future development on the Specific Plan site and in the Entrada planning area. Potential impacts to agricultural operations and resources located beyond the boundaries of the Specific Plan site that would result from the build-out of the Specific Plan are evaluated in **Subsection 4.12.6.2.2**. That evaluation concluded that with the implementation of previously adopted land use buffer mitigation measures, potential impacts to agricultural resources located adjacent to the Specific Plan site would be reduced to a less-than-significant level. It also was concluded that Project-related effects on off-site agricultural support facilities (*e.g.*, packing facilities) and seasonal employment opportunities would not result in significant environmental impacts. Therefore, potential secondary agricultural resource impacts resulting from the implementation of Alternative 7 and the subsequent development located on the Specific Plan site would not be significant under Significance Thresholds 1, 2, and 3.

The Entrada planning area presently is used for grazing. The conversion of designated agricultural lands on the Entrada planning area to nonagricultural uses would be a site-specific impact that would not result in the conversion of agricultural lands to the west of the Project area in Ventura County. Therefore, the Entrada development facilitated by Alternative 7 would not result in significant secondary impacts under Significance Thresholds 1 or 2. Implementation of Alternative 7 and the resulting elimination of limited grazing operations on the Entrada planning area would not result in significant secondary impacts to agricultural support facilities that are relied upon by other agricultural operations located in the Project region. The establishment of urban uses on the Entrada planning area would not conflict with remaining agricultural operations in Ventura County, which are approximately five miles west of the Project area. Therefore, Alternative 7 would not result in significant secondary impacts under Significance Threshold 3.

Table 4.12-15 summarizes the potential for significant agricultural resources to be impacted as a result of the direct, indirect, and secondary impacts of Alternative 7.

Table 4.12-15				
Alternative 7 Direct/Indirect/Secondary Significant Impacts				
Aggregate Totals				
Type of Impact	Potential for Impacts to Agricultural Soils			
	Prime (acres)	Unique (acres)	Statewide Importance (acres)	Total (acres)
Direct	157.3	188.2	18.4	363.9
Indirect	476.6	46.6	0.6	523.8
Secondary	0.0	0.0	0.0	0.0
Total	633.9	234.8	19.0	887.7

4.12.7 MITIGATION MEASURES

4.12.7.1 Mitigation Measures Already Required by the Adopted Newhall Ranch Specific Plan EIR

Los Angeles County previously adopted mitigation measures to minimize impacts to agricultural resources within the Specific Plan area as part of its adoption of the Newhall Ranch Specific Plan Program EIR. The measures are found in the previously certified Newhall Ranch Specific Plan Program EIR and the adopted Mitigation Monitoring Plans for the Specific Plan and WRP (May 2003), and are summarized in **Table 4.12-1**, above. In addition, these mitigation measures are set forth in full below, and preceded by "SP," which stands for Specific Plan.

- SP-4.4-1 Purchasers of homes located within 1,500 feet of an agricultural field or grazing area are to be informed of the location and potential effects of farming uses prior to the close of escrow.
- SP-4.4-2 New homes within 1,500 feet of farming uses within Ventura County, if any, are to be informed that agricultural activities within Ventura County are protected under the County's right-to-farm ordinance, and are to be provided with copies of the County's Amended Ordinance 3730-5/7/85.

4.12.7.2 Mitigation Measures Relating to the VCC Project

The VCC EIR (April 1990) determined that, according to the State of California Office of Land Conservation Farmland Maps, approximately 292 acres of prime farmland and 95 acres of farmland of statewide importance would be lost due to project development. However, the Department of Agricultural Commission and Weights and Measures stated that there would be no significant impact on Los Angeles County's agricultural resources as a result of the VCC project. Therefore, the VCC EIR concluded that no mitigation measures were required.

However, as noted in **Subsection 4.12.1.2.1**, above, additional environmental review will be conducted by the County of Los Angeles with respect to the VCC planning area, because the applicant recently submitted the last tentative parcel map for build-out of the VCC planning area. Implementation of additional mitigation requirements (*e.g.*, measures similar to those previously adopted for the Specific Plan area and/or recommended for the proposed Project) would ensure that potential impacts to agricultural resources within the VCC planning area are reduced to the extent feasible.

4.12.7.3 Mitigation Measures Relating to the Entrada Planning Area

The County of Los Angeles has not yet prepared or released a draft EIR for the proposed development within the portion of the Entrada planning area that would be facilitated by approval of the SCP component of the proposed Project. As a result, there are no previously adopted mitigation measures for the Entrada planning area. However, the adoption and implementation of measures similar to those previously adopted for the Specific Plan area and/or recommended for the proposed Project would ensure that potential impacts to agricultural resources within the Entrada planning area are reduced to the extent feasible.

4.12.7.4 Additional Mitigation Measures Proposed by this EIS/EIR

The proposed Project would result in a significant impact related to the conversion of agricultural soils that have been designated prime farmland, unique farmland, or farmland of statewide importance (Significance Threshold 1). Also, while the establishment of a spineflower preserve on the Entrada planning area would not convert important agricultural soils to urban uses, the proposed preserve would conflict with the existing agricultural zoning in the Entrada planning area (Significance Threshold 2).

The conversion of important agricultural soils to nonagricultural uses to implement the Specific Plan was previously approved by Los Angeles County, and a Statement of Overriding Considerations was adopted for the significant agricultural soil conversion impact. The feasibility of implementing additional mitigation measures for this significant impact is evaluated below.

4.12.7.4.1 Impact Avoidance

Impacts resulting from the conversion of soils designated as prime, unique, or statewide importance to a nonagricultural use may be avoided by not placing development in areas that contain those soils, and thereby preserving the soil for future agricultural use. This mitigation approach is infeasible because the Specific Plan, and the resulting conversion of soils designated as prime, unique, or of statewide importance, has been previously approved by Los Angeles County. Relocating proposed infrastructure improvements to avoid direct impacts to significant agricultural soils is not feasible because the proposed infrastructure facility locations have been identified to appropriately serve the development and land uses established by the previously approved Specific Plan. In addition, preserving areas on the Specific Plan site with significant agricultural soils would not necessarily avoid significant indirect agricultural soil conversion impacts because the development of previously approved urban uses on areas of the Specific Plan site that do not contain prime, unique, or soils of statewide importance would likely result in land use conflicts (*e.g.*, noise, dust, odor, spraying, and trespass) that would substantially and adversely affect the viability of agricultural operations located on the preserved soil areas.

The proposed Project also would result in the establishment of spineflower preserves in areas that contain prime agricultural soils. A mitigation measure to avoid establishing spineflower preserves in areas with important agricultural soils is not feasible because the spineflower preserves can only be established where spineflower plants occur.

Based on the analysis provided above, mitigation measures to avoid areas on the Project site that contain soils designated as prime, unique, or of statewide importance are not considered to be feasible.

4.12.7.4.2 Land Use Consistency Zone Change

The Entrada planning area is zoned for agricultural activities, and the applicant leases portions of the Entrada planning area for agricultural uses. Establishment of the Entrada spineflower preserve would result in a significant agricultural resource impact because the preserve would permanently prohibit agricultural activities on an area zoned for agricultural use.

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This impact would likely be temporary because development applications have been filed with Los Angeles County to change the zoning of the Entrada planning area. The proposed zone change would eliminate the agricultural zoning designation and replace it with an "Open Space" or similar designation, which would be consistent with the proposed spineflower preserve use. A mitigation measure to avoid the zoning conflict with the existing agricultural zoning by not establishing the Entrada preserve until the County approves the requested zone change is not an appropriate measure because if the zone change is not approved, the preserve could not be established, which would be inconsistent with the resource protection objectives of the proposed Project. The applicant already has requested the approval of a zone change to eliminate the zoning conflict. Therefore, no additional mitigation is feasible or required. However, approval of the requested zone change is beyond the control of the applicant. If the zone change for the preserve site is not approved, the zoning conflict between the proposed preserve and the site's agricultural zoning would not be reduced to a less-than-significant level.

4.12.7.4.3 Interim Use of Designated Agricultural Land

Approximately 1,026 acres of the Project area contain prime, unique, or soils of statewide importance, and approximately 1,877 acres of the Specific Plan site are cultivated. An interim use mitigation measure would require Newhall Land to enter into a Memorandum of Understanding (MOU) with CDFG (the lead agency for this EIS/EIR) to develop a phasing plan for the discontinuation of existing agricultural operations located on the Specific Plan site. The purpose of the phasing plan would be to keep areas with prime, unique, or soils of statewide importance in agricultural production as long as the agricultural operations do not compromise the ability of the applicant to implement the approved Specific Plan.

The length of time that individual areas on the Specific Plan site would remain in agricultural production under a phasing plan agreement would vary depending on the location of the farming area on the Specific Plan site and build-out timing of the Specific Plan. For example, farming operations in areas of the Specific Plan that are scheduled for development in the near future may only continue to operate for several years. However, agricultural areas located on other portions of the Specific Plan site may continue to operate for 10 years or more. A phasing plan agreement would maintain the viability of existing Project site farming operations to the extent feasible, and would minimize potential regional economic impacts that could result if all farming operations on the Specific Plan site were to be terminated at a single time. Therefore, the following mitigation measure is recommended:

AG-1 Newhall Land shall enter into a Memorandum of Understanding with the California Department of Fish and Game to develop a phasing plan for the discontinuation of existing agricultural operations located throughout the Specific Plan site.

A phasing plan agreement is a feasible mitigation measure that would minimize potential agricultural resource impacts of the proposed Project. Such a mitigation measure, however, would not reduce impacts to agricultural resources to a less-than-significant level.

4.12.7.4.4 Place Agricultural Conservation Easements on Agricultural Land

Another possible mitigation measure for farmland conversion impacts is the preservation of off-site farmland resources. This may be accomplished by methods such as dedicating farmland to a land

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conservation organization, or establishing a conservation easement on existing farm operations. Establishing an agricultural conservation easement generally involves purchasing permanent deed restrictions on agricultural land that preclude its use for development or nonagricultural purposes. Conservation easements, however, do not directly result in the replacement of converted agricultural land. The ability of a conservation easement mitigation measure to reduce agricultural resource impacts is evaluated in additional detail below.

Figure 4.12-3 shows the location of the agricultural conservation easement proposed by this Project. This easement area consists of the Salt Creek corridor conservation area, including agricultural lands in Ventura County adjacent to the western boundary of the Specific Plan site and the Santa Clara River, and this area contains 88 acres of prime, unique, and/or soils of statewide importance. The area is owned by Newhall Land and is to be preserved as foraging habitat for animal species, such as white tailed kite. In addition to preserving the area for its habitat value, it would be feasible to place an agricultural conservation easement over the area to preserve its existing agricultural soil resources.

In the vicinity of the Salt Creek corridor conservation area, there are approximately 50 additional acres in active agricultural production that are owned by Newhall Land (**Figure 4.12-3**) that also contain prime agricultural soils. Due to their proximity to the proposed Salt Creek corridor conservation area, it would be feasible to include these additional agricultural lands in the agricultural conservation easement described above. In total, placing an agricultural conservation easement over the Salt Creek corridor conservation area (88 acres of cultivated land) and on the adjacent agricultural lands would preserve approximately 138 acres of agricultural land located adjacent to the Specific Plan area.

As indicated in **Table 4.12-4**, the proposed Project would result in direct impacts to approximately 122.8 acres of prime, unique, and statewide importance agricultural soils due to the construction of proposed infrastructure facilities. Implementation of the agricultural conservation easement described above would offset the direct agricultural soil impacts of the proposed Project at a ratio of about one acre of agricultural land preserved for each impacted acre. With a 1:1 mitigation ratio, 122.8 acres ($138 - 122.8 = 15.2$) of agricultural easement acreage would remain available for additional mitigation of Project-related impacts.

Implementation of the proposed spineflower preserves would directly impact approximately 17 acres of prime agricultural soils located on the Grapevine Mesa and Airport Mesa areas. Although establishing spineflower preserves would preclude future agricultural operations in those areas, a substantial environmental benefit would be achieved by the proposed conservation of spineflower habitat. In addition to the benefit of providing spineflower habitat, the loss of prime agricultural soils located on the preserve sites could be offset by the proposed agricultural conservation easements. Given the environmental benefits derived from the proposed spineflower preserves, mitigation of impacted agricultural land at a ratio of one mitigation acre for every two impacted acres would be appropriate.

With a 1:2 mitigation ratio, 8.5 acres of agricultural conservation easement area would be required, which would leave 6.7 ($15.2 - 8.5 = 6.7$) acres available for additional mitigation of Project-related impacts.

Placing an agricultural easement over the lands described above would conserve a total of 138 acres of prime agricultural land and reduce the proposed Project's (Alternative 2) significant direct impacts

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(impacts resulting from RMDP infrastructure and spineflower preserves) to important agricultural soils to a less-than-significant level. As shown in **Table 4.12-16**, however, the easement would not reduce the total direct impacts of Alternatives 3-7 to a less-than-significant level.

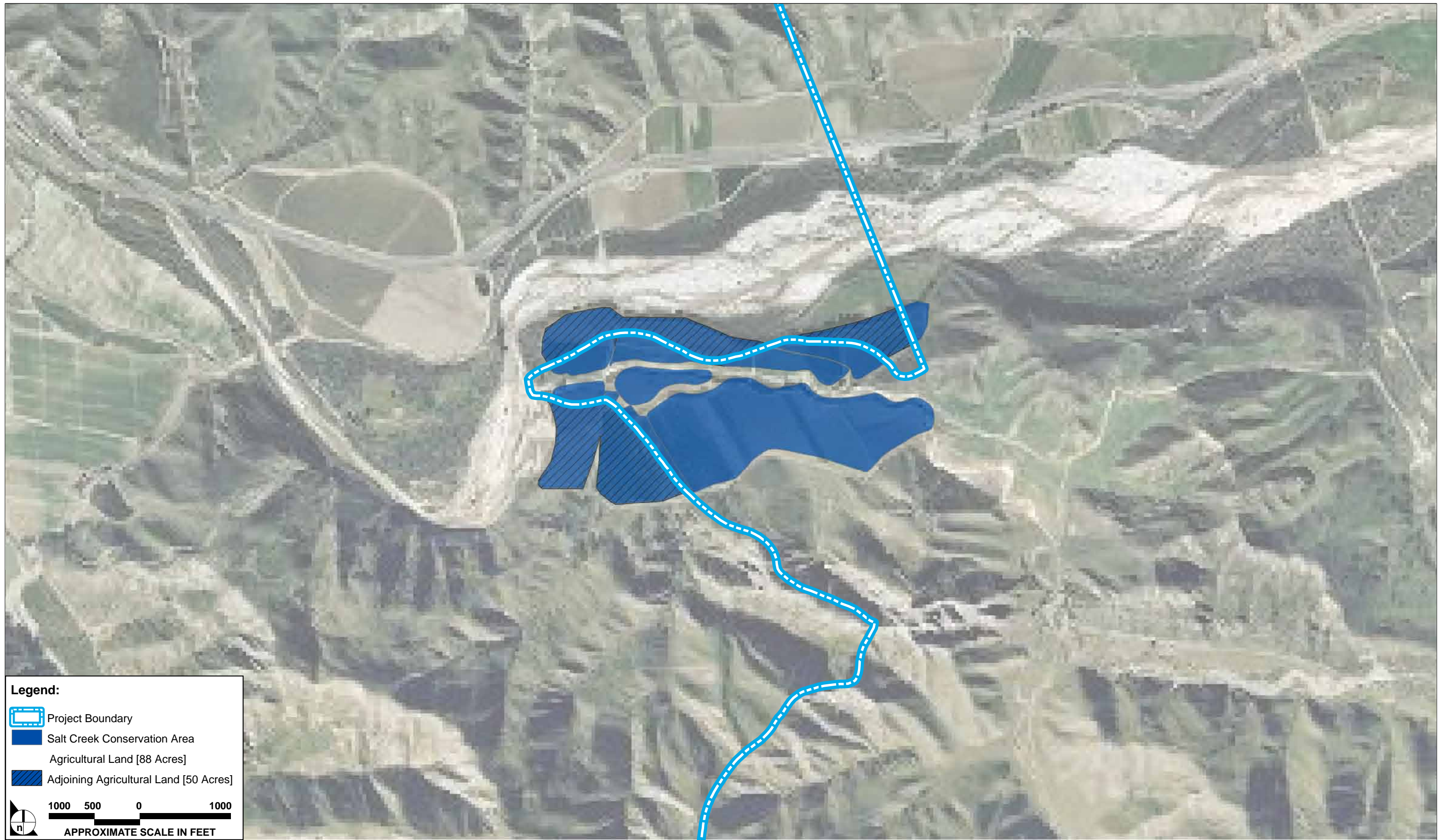
**Table 4.12-16
RMDP and SCP Direct Impact Mitigation
For Impacts to Important Agricultural Soils**

	Alt 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7
RMDP direct impacts to Prime, Unique and Statewide Importance soils (acres)	0	122.8	136.5	132.2	136.0	119.6	298.5
Mitigation acres required at a 1:1 conservation ratio	0	122.8	136.5	132.2	136.0	119.6	298.5
SCP direct impact to Prime, Unique and Statewide Importance Soils (acres)	0	17.1	17.1	17.3	17.3	51.6	65.5
Mitigation acres required at a 1:2 conservation ratio	0	8.6	8.6	8.7	8.7	25.8	32.8
Total RMDP and SCP direct impact to Prime, Unique and Statewide Importance soils (acres)	0	139.9	153.6	149.5	153.2	171.2	363.9
Total mitigation acres required at proposed conservation ratios	0	130.6	153.6	149.5	153.2	171.2	363.9
Total mitigation acres available	0	138	138	138	138	138	138
Direct impact reduced to less than significant?	NA	Yes	No	No	No	No	No

Source: Rodriguez Consulting, Inc. (2009)

Development indirectly facilitated on the VCC planning area by implementing the proposed SCP would result in the indirect loss of approximately 53.9 acres of prime, unique, and statewide importance agricultural soils. The loss of important farmland on the approved VCC site was not evaluated by the VCC EIR, indicating that Los Angeles County previously determined that the loss of agricultural soil on the VCC site was not a significant impact. This determination may be re-evaluated by the County in conjunction with subsequent environmental review that will be required for land use entitlements (TPM No. 18108) that have been submitted by the applicant for build-out of the VCC project.

The proposed agricultural conservation easements would not offset the significant indirect impacts to important agricultural soils that would result from development located on the Specific Plan site. Although the proposed conservation easements would not mitigate this indirect impact, Los Angeles County has approved the Specific Plan and adopted a Statement of Overriding Considerations for the impact to agricultural soils that would result from Specific Plan implementation.



SOURCE: URS - December 2007

FIGURE 4.12-3

Location of Agricultural Conservation Easement Areas

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The cost of purchasing development rights and establishing an agricultural conservation easement typically reflects the value of a property's development rights, which is generally equal to the difference between a property's unrestricted market value and its value when restricted to agricultural use. The value of development rights usually is determined by an appraisal of the fair market value of restricted and unrestricted agricultural land. In Los Angeles County, where development pressure on agricultural land historically has been very high and is expected to remain high, the difference between the value of unrestricted agricultural land and restricted land would be a substantial percentage of the property's unrestricted fair market value. As a result, the cost of purchasing additional agricultural conservation easements to offset the loss of agricultural soils on the VCC planning area and Specific Plan site would be very high. Due to the high cost of implementation, it would not be feasible to enact additional agricultural conservation easements to mitigate the indirect conversion of important agricultural soils located on the VCC planning area and Specific Plan site to a less-than-significant level.

In conclusion, implementation of agricultural conservation easements in the Salt Creek conservation area and on adjoining agricultural lands is a feasible mitigation measure that would offset the direct impacts of the proposed Project. Therefore, the following mitigation measure is proposed. This mitigation measure, however, would not reduce indirect impacts to agricultural resources on the Specific Plan site to a less-than-significant level.

AG-2 Newhall Land shall dedicate a permanent agricultural conservation easement for 138 acres of agricultural land located in the Salt Creek conservation area and on adjoining agricultural lands.

4.12.7.4.5 Enroll Existing Agricultural Land into a Williamson Act Contract

The Williamson Act is a voluntary farmland conservation program whereby landowners contractually commit to restrict the use of eligible farmland to approved agricultural uses for a period of at least 10 years. In return, the farmland property that is placed into an agricultural preserve is taxed at a rate based on the actual agricultural use of the land rather than its unrestricted market value. A related agricultural land preservation program is the farmland security zone, which is an area created within an agricultural preserve. Properties restricted by a 20-year farmland security zone contract are valued for property assessment purposes at 65 percent of its Williamson Act valuation, or 65 percent of its Proposition 13 valuation, whichever is lower.

The use of a Williamson Act or farmland security zone contract to offset the loss of significant agricultural soil in Los Angeles County is not a feasible mitigation measure because Los Angeles County has not adopted a land conservation program. Furthermore, the short-term effects of enrolling an existing agricultural operation into a Williamson Act contract would not offset the long-term loss of significant agricultural soils on the Project site.

4.12.7.4.6 Resources Agency Mitigation Policies

In a memorandum dated May 4, 2005, the California Resources Agency provided guidance regarding the CEQA review of projects affecting agricultural resources. A copy of the memorandum is provided in

Appendix 4.12. In summary, the memorandum identified the following three issues related to agriculture resource impact evaluations.

1. **Where feasible, projects should include both restoration and agricultural preservation benefits.** Mitigation Measure AG-2, which calls for an agricultural conservation easement on approximately 138 acres, is consistent with this policy and would reduce the direct impacts of the proposed Project to important agricultural soils to a less-than-significant level; however, the agricultural conservation easement would not fully mitigate significant indirect agricultural soil conversion impacts resulting from implementation of the previously approved VCC and Specific Plan projects. Due to economic constraints, it would not be feasible to implement additional agricultural easements to fully mitigate the indirect impacts of the proposed Project.
2. **Potential social and economic consequences of agricultural land conversions should be considered.** Mitigation Measure AG-1 requires that existing agricultural operations within the Specific Plan site be discontinued in a phased manner to minimize potential socioeconomic impacts that may result if the agricultural operations were to be terminated all at once. Therefore, the proposed mitigation measure addresses and is consistent with the requirements of this policy.
3. **Each project should be evaluated on a case-by-case basis to review physical changes associated with agricultural conversion impacts.** Consistent with the requirements of this policy, this EIS/EIR provides an extensive evaluation of direct, indirect, and secondary impacts that would result from implementation of the proposed Project. In addition, mitigation measures have been proposed to reduce the direct impacts of the proposed Project to a less-than-significant level.

4.12.8 SUMMARY OF SIGNIFICANCE FINDINGS

On the Specific Plan site, direct farmland conversion impacts would result from the construction of proposed RMDP infrastructure improvements and the establishment of new spineflower preserves under the SCP. The direct impacts of the proposed Project would be reduced to a less-than-significant level by the implementation of the proposed agricultural conservation easement on a portion of the Salt Creek conservation area (approximately 88 acres of cultivated land) and on approximately 50 acres of cultivated land adjacent to the Salt Creek area.

Indirect farmland conversion impacts also would occur on the Specific Plan site as a result of the new development facilitated by implementation of the RMDP and the SCP. On the VCC planning area, significant indirect impacts from the conversion of significant farmland soil would result from new development facilitated by implementation of the SCP. The proposed agricultural conservation easement would not fully mitigate the indirect agricultural soil conversion impacts on the previously approved Specific Plan and VCC projects; and, therefore, indirect impacts remain significant and unavoidable.

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A significant direct impact would occur on the Entrada planning area as a result of establishing the proposed spineflower preserve in an area with agricultural zoning. This impact would occur until such time that the land use designation of the preserve site is changed, as proposed by the development applications submitted to Los Angeles County. However, this impact is considered to be significant and unavoidable because it is beyond the control of the applicant to implement the zone change required to eliminate the zoning conflict.

Table 4.12-17 presents a summary of the significance criteria relating to each of the Project alternatives, and the reduced level of impact that would be achieved for each alternative by applying the above mitigation measures.

Table 4.12-17
Summary of Significant Agricultural Impacts - Pre- and Post-Mitigation

Significance Criteria	Applicable Mitigation Measures	Planning Area	Impact of Alternatives - Pre/Post-Mitigation						
			Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
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, to nonagricultural use.	AG-1 AG-2	NRSP	NI	SI/SU	SI/SU	SI/SU	SI/SU	SI/SU	SI/SU
		VCC	NI	SI/SU	SI/SU	NI	NI	NI	NI
		Entrada	NI	NI	NI	NI	NI	NI	NI
Project would conflict with existing zoning for agricultural use or a Williamson Act contract.	No additional measures required	NRSP	NI	NI	NI	NI	NI	NI	NI
		VCC	NI	NI	NI	NI	NI	NI	NI
		Entrada	NI	SI/SU	SI/SU	SI/SU	SI/SU	SI/SU	SI/SU
Project would involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to nonagricultural use.	No additional measures required	NRSP	NI	NI	NI	NI	NI	NI	NI
		VCC	NI	NI	NI	NI	NI	NI	NI
		Entrada	NI	NI	NI	NI	NI	NI	NI

SU = Significant unavoidable impact
 SI = Significant impact
 NI = No impact, and no mitigation required

4.12.9 SIGNIFICANT UNAVOIDABLE IMPACTS

The proposed Project (Alternative 2) would result in significant and unavoidable indirect impacts to agricultural resources resulting from the conversion of prime, unique, and soils of statewide importance to nonagricultural uses on the Specific Plan site. The "build" alternatives would result in significant and unavoidable direct and indirect impacts to agricultural resources resulting from the conversion of important agricultural lands on the Specific Plan site. Significant and unavoidable indirect impacts resulting from the conversion of prime, unique, and soils of statewide importance also would occur at the VCC project site with implementation of Alternatives 2 and 3. Although it is likely to be a temporary impact, a significant and unavoidable direct impact also would result from the establishment of a spinesflower preserve on the Entrada planning area, which is presently zoned for agricultural uses.