

5. Environmental Analysis

5.2 AGRICULTURE AND FORESTRY RESOURCES

5.2.1 Environmental Setting

5.2.1.1 REGULATORY SETTING

State and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized below.

State

Farmland Mapping and Monitoring Program

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

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

Farmland of Statewide Importance. Similar to Prime Farmland but with minor shortcomings, such as 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. Lesser-quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include nonirrigated orchards or vineyards. Land must have been cultivated at some time during the four years prior to the mapping date.

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

Senate Bill 850/Land Evaluation and Site Assessment

LESA is an approach for rating the relative quality of land resources based on specific measurable features. The formulation of a California Agricultural LESA Model was the result of Senate Bill 850 (Chapter 812/1993), which tasked the Resources Agency, in consultation with the Governor's Office of Planning and Research, with

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developing an amendment to Appendix G of the California Environmental Quality Act (CEQA) Guidelines concerning agricultural lands. The amendment is intended “to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process” (Public Resources Code, Section 21095).

The California LESA Model is based on a 100-point scale, and the LESA score has two parts. The Land Evaluation (LE) factors score rates the soil in relation to agriculture. The Site Assessment (SA) factors score rates all remaining factors as they pertain to agriculture. A detailed LESA analysis is not practicable at a city general plan scale. However, methods and criteria from the LESA model are used where appropriate in the impact analyses in this section.

California Land Conservation Act (Williamson Act)

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

City of Clovis

Agriculture Land Use Designation

There are currently 10,199 acres designated Agriculture within the Plan Area. Of this total, 389 acres are in the SOI and 9,810 acres in the non-SOI Plan Area. Relative to total land area, 7 percent of the SOI and 36 percent of the non-SOI Plan Area are designated for agricultural use. No lands in the City of Clovis are designated Agriculture.

5.2.1.2 EXISTING SETTING

Agricultural Uses

Fresno County

Since the early 1950s, Fresno County has led all counties in the United States in the greatest agricultural production by dollar value (Fresno County 2000; Fresno County 2011). Agriculture is the largest industry in the county, producing \$5.94 billion in 2010. The top five crops by dollar value in 2010, in descending order, were grapes, almonds, tomatoes, poultry, and milk (Fresno County 2011). In 2010, about 1.6 million acres, or 2,500 square miles, were in agricultural production, that is, about 42 percent of the county’s land area (UCCE 2011).

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Clovis and Vicinity

The early agricultural history of Clovis was partly tied to the logging industry in the Sierra Nevada. A 42-mile log flume was built from Shaver Lake to Clovis, and a mill and finishing plant were developed in Clovis. Other agricultural products from the Clovis area included grains and livestock (Clovis 2012). Currently, there is little active agricultural use in the Plan Area because of water supply constraints and soil suitability issues, even though 7 percent of the SOI and 36 percent of the non-SOI Plan Area are designated Agriculture.

Agricultural Designations and Williamson Contracts

Mapped Farmland

CEQA considers impacts to three categories of farmland: Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. Mapped farmland in the Plan Area is shown on Figure 5.2-1, *Existing Important Farmland*; acreage of mapped farmland in the Plan Area is shown in Table 5.2-1.

Table 5.2-1 Existing Important Farmland in Plan Area, Acres

Farmland Category	City	Sphere of Influence	Non-SOI Plan Area	Total
Prime Farmland	146	1,757	1,222	3,125
Farmland of Statewide Importance	85	257	1,457	1,799
Unique Farmland	10	503	1,201	1,714
Total	241	2,517	3,880	6,638

Source: California Department of Conservation, Division of Land Resource Protection 2010.

Note: Acreages rounded.

As the table shows the Plan Area has 6,638 acres of Important Farmlands, of which 3,125 acres, or 47 percent, are classified Prime Farmland. Farmland of Statewide Importance makes up 27 percent of Important Farmlands, and Unique Farmland 26 percent in the Plan Area.

General Plan Designation for Agricultural Use

There are 10,199 acres in the Plan Area designated for agricultural use under the current General Plan— 9,810 acres in the non-SOI Plan Area and 389 acres in the SOI. No land within the City is designated for agriculture (see Figure 3-4, *Current General Plan Land Use*). The land designated for agriculture is approximately 23 percent of the entire Plan Area.

Williamson Act Contracts

Land in the Plan Area bearing Williamson Act contracts is shown on Figure 5.2-2, *Williamson Act Lands*, and is listed by acreage in Table 5.2-2. Of the 6,949 acres bearing Williamson Act contracts in the Plan Area, contracts on 1,770 acres have nonrenewal status, and the majority of that is Prime Agricultural Lands. Total enrollment in Williamson Act contracts in Fresno County in 2011 was about 1.49 million acres (DLRP 2013). Therefore, the 6,949 acres under Williamson Act contract in the Plan Area is about 0.5 percent of the countywide total.

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Table 5.2-2 Existing Williamson Act Contract Farmland in Plan Area, Acres

Contract Type ¹	City	Sphere of Influence	Non-SOI Plan Area	Total
P - Prime Agricultural Lands	None	510	1,170	1,680
P-NR - Prime Agricultural Lands (Non-Renewal)	None	855	330	1,185
NP - Non-Prime Agricultural Lands	None	1	3,498	3,499
NP-NR - Non-Prime Agricultural Lands (Nonrenewal)	None	16	569	585
Total	None	1,382	5,567	6,949

Source: California Department of Conservation, Division of Land Resource Protection 2012.

Notes: Acreages rounded.

¹Prime Agricultural Lands:

Land which is enrolled under California Land Conservation Act contract and meets any of the following criteria (as set forth under California Government Code Section 51201):

- 1: Land which qualifies for rating as class I or class II in the Natural Resources Conservation Service land use capability classifications;
- 2: Land which qualifies for rating 80 to 100 in the Storie Index Rating;
- 3: Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture;
- 4: Land planted with fruit or nut-bearing trees, vines, bushes or crops which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars per acre;
- 5: Land which has returned from the production of unprocessed agricultural plant production and has an annual gross value of not less than two hundred dollars per acre for three of the previous five years.

Non-Prime Agricultural Lands:

Land which is enrolled under California Land Conservation Act contract and does not meet any of the criteria for classification as Prime Agricultural Land. Non-Prime Land is defined as Open Space Land of statewide Significance under the California Open Space Subvention Act (see California Government Code Section 16143), and may be identified as such in other documents. Most Non-Prime Land is in agricultural uses such as grazing or non-irrigated crops. However, Non-Prime Land may also include other open space uses which are compatible with agriculture and consistent with local general plans.

Land in Nonrenewal:

During the Nonrenewal process, the annual tax assessment gradually increases. At the end of the 9-year Nonrenewal period, the contract is terminated.

Conversion of Farmland to Nonagricultural Use

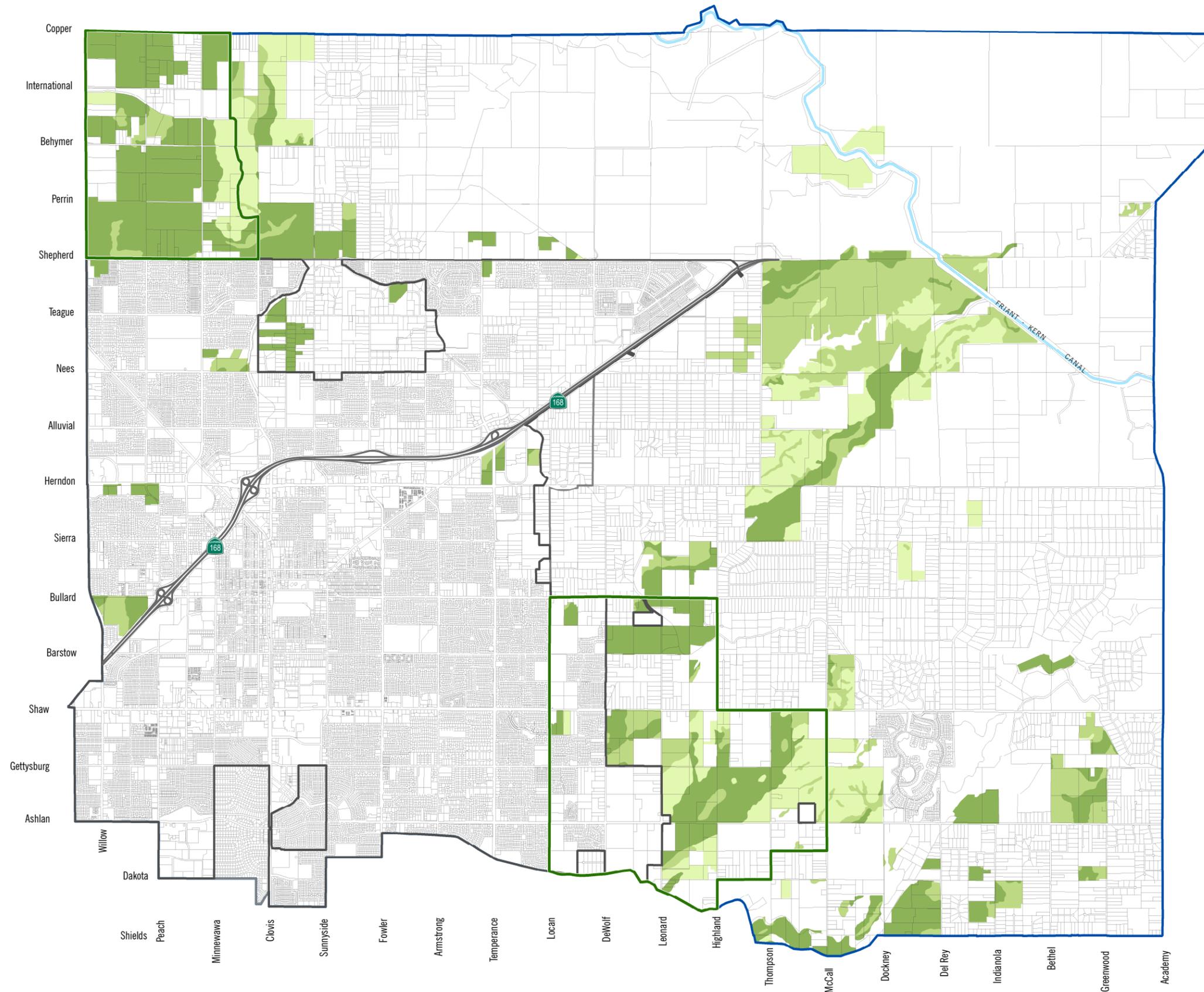
Between 1990 and 2004, 21,525 acres of farmland—or one out of every five acres in Fresno County—were converted to urban uses. At least 58 percent of this land was of the highest quality or lands designated Prime Farmland, Unique Farmland and Farmland of Statewide Importance (AFT 2008). An additional 11 percent was high quality farmland taken out of agricultural use before it was developed with urban uses. Because these lands are classified as “other” during this period, as much of 69 percent of all of the land developed in the county was Important Farmland.

Between 2006 and 2008, 3,011 acres of Important Farmland in Fresno County were committed to nonagricultural uses: 1,560 acres of Prime Farmland, 438 acres of Farmland of Statewide Importance, 244 acres of Unique Farmland, and 769 acres of Farmland of Local Importance (DLRP 2011).

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Figure 5.2-1

Existing Important Farmland



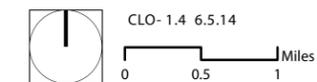
- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Frait Kern Canal
- City Boundary
- Sphere of Influence Boundary
- Urban Center Boundary
- Plan Area Boundary

Note:
The California Department of Conservation farmland data used in analysis of converted farmland was updated to reflect development and entitled property since 2010.



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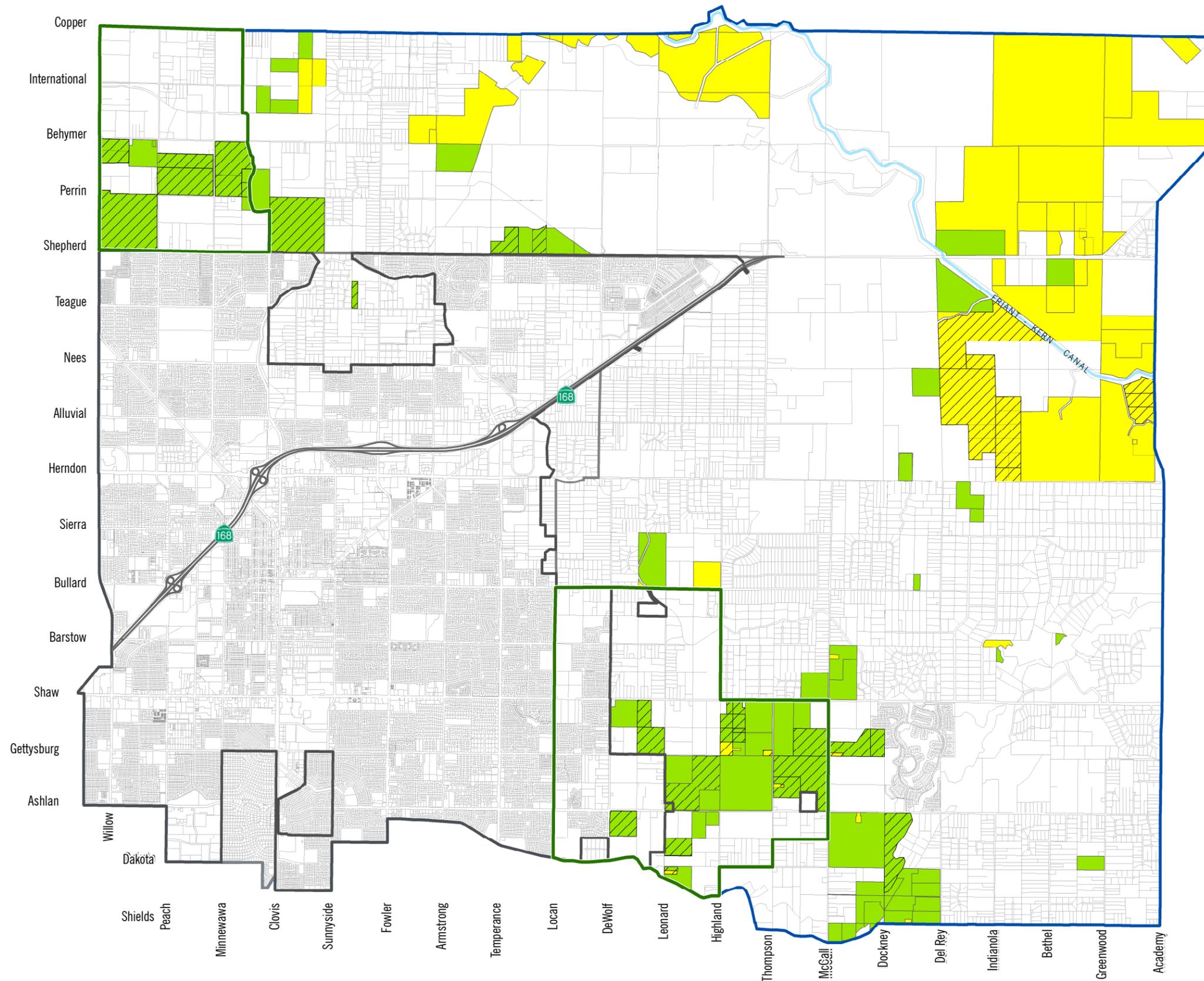
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Figure 5.2-2

Williamson Act Lands



- P - Prime Agricultural Land
- ▨ P-NR - Prime Agricultural Land (Non-Renewal)
- NP - Non-Prime Agricultural Land
- ▨ NP-NR - Non-Prime Agricultural Land (Non-Renewal)
- Faint Kern Canal
- City Boundary
- Sphere of Influence Boundary
- Urban Center Boundary
- Plan Area Boundary



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Model Farmland Conservation Program for Fresno County

Recognizing the need to strike a balance between urban development and conserving farmland, the California Partnership for the San Joaquin Valley awarded the Fresno County Council of Governments (COG) a grant to design a model farmland conservation program (AFT 2008). The American Farmland Trust (AFT) was commissioned to design a model program with three primary components: identification and mapping of agricultural lands most important to conserve because of their relative advantages for agricultural production; documentation and evaluation of conditions and trends affecting agricultural lands; and selection of a set of policies and tools to conserve the most strategic farmland while accommodating urban growth.

Strategic Farmlands

The program adopted an innovative approach in mapping farmlands most in need of conservation. Whereas the state's Farmland Mapping and Monitoring Program relies primarily on the productivity of different soils, the AFT's Strategic Farmland designations reflect a wider range of factors established through a public participation process. The first three—soil productivity, water cost and reliability, and microclimate—have a positive influence on agriculture. Soil productivity reflects soil quality as described in the state program. Water cost and reliability reflect its availability and vulnerability to restrictions and/or service interruptions. Microclimate, as chosen by local experts, describes locations where climatic factors enable the growth of citrus, an important and high-value crop in the county.

The remaining three factors—environmentally sensitive areas, fragmentation of land into small parcels, and urban development pressure—have negative impacts on agricultural. The first factor refers to regulations pertaining to wetlands, vernal pools, and/or endangered species. The last factor, urban growth pressure, was based on a growth model that incorporated project growth per local plans, projected population growth, and development attractor and detractor values where development was considered likely to occur. Finally, land within cities' spheres of influence was not included in the mapping effort because these areas are considered designated for urban development.¹

Lands were then classified as Very High, High, Medium, and Low, to reflect their relative strategic values in conservation efforts. Of the 2.2 million acres in Fresno County, 22 percent falls into the Very High and High strategic value categories. Very High value farmlands makes up approximately 9 percent of the county, concentrated in the eastern and southeastern area. High value farmlands extend farther west and constitute about 13 percent of the total study area.

Figure 5.2-3, *Strategic Farmland*, shows the Strategic Farmland in the non-SOI Plan Area. Only two areas in the non-SOI Plan Area have farmlands valued as Very High—133 acres in the southeastern portion of the Plan Area. There are no farmlands identified as High value in the Plan Area. The Medium value strategic farmlands total 14,137 acres and Low value total 2,549 acres.

¹ Although areas in existing cities' sphere of influence throughout the county have some of the most productive land, the policy decision was made to eliminate the areas from the strategic mapping effort and thereby from consideration for agricultural conservation.

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The Strategic Farmland map was also intersected with the Important Farmland map, as shown in Figure 5.2-4 *Existing Important vs. Strategic Farmland*. As shown, Important Farmlands were largely classified as Medium value.

A series of policy recommendations were made as part of the Model Farmland Conservation Program, including a proposed agricultural reserve for Fresno County of some 559,000 acres of farmland. The recommendations were not adopted by the COG, local cities, or the county.

San Joaquin Valley Greenprint

The San Joaquin Valley (SJV) Greenprint, a project of the San Joaquin Valley Regional Policy Council, started in 2011. The project grew out of the San Joaquin Valley Blueprint, an effort to provide a vision for urban growth in the eight valley counties. The Blueprint addresses urban areas, and the SJV Greenprint provides a voluntary framework to assist land use and resource management decisions in the valley's nonurban areas. The SJV Greenprint focuses on the challenges and opportunities in nonurban land use planning—specifically agricultural, water and ecology—and how decisions shape the region's economy and environment.

The first phase of the project, which entails mapping and data collection, is anticipated to be complete in summer 2014, with acceptance by the Regional Policy Council slated for September 2014. The second phase will gather valley leaders and residents in public forums to develop a vision of shared regional priorities for resource management. This phase also sets the stage for local decision makers to voluntarily begin incorporating the goals and strategies identified through the SJV Greenprint process into their planning efforts and project development.

Forest Lands

There is no land in the City, in the existing SOI, or in the non-SOI Plan Area that is zoned as forest land or timberland. That said, there are relatively small areas of riparian forest along Dry Creek, Dog Creek and Redbank Slough (see Figure 5.9-3 in Section 5.3, *Hydrology*). Dry Creek traverses the City, SOI, and non-SOI Plan Area; Dog Creek, the SOI and non-SOI Plan Area; and Redbank Slough is in the non-SOI Plan Area.

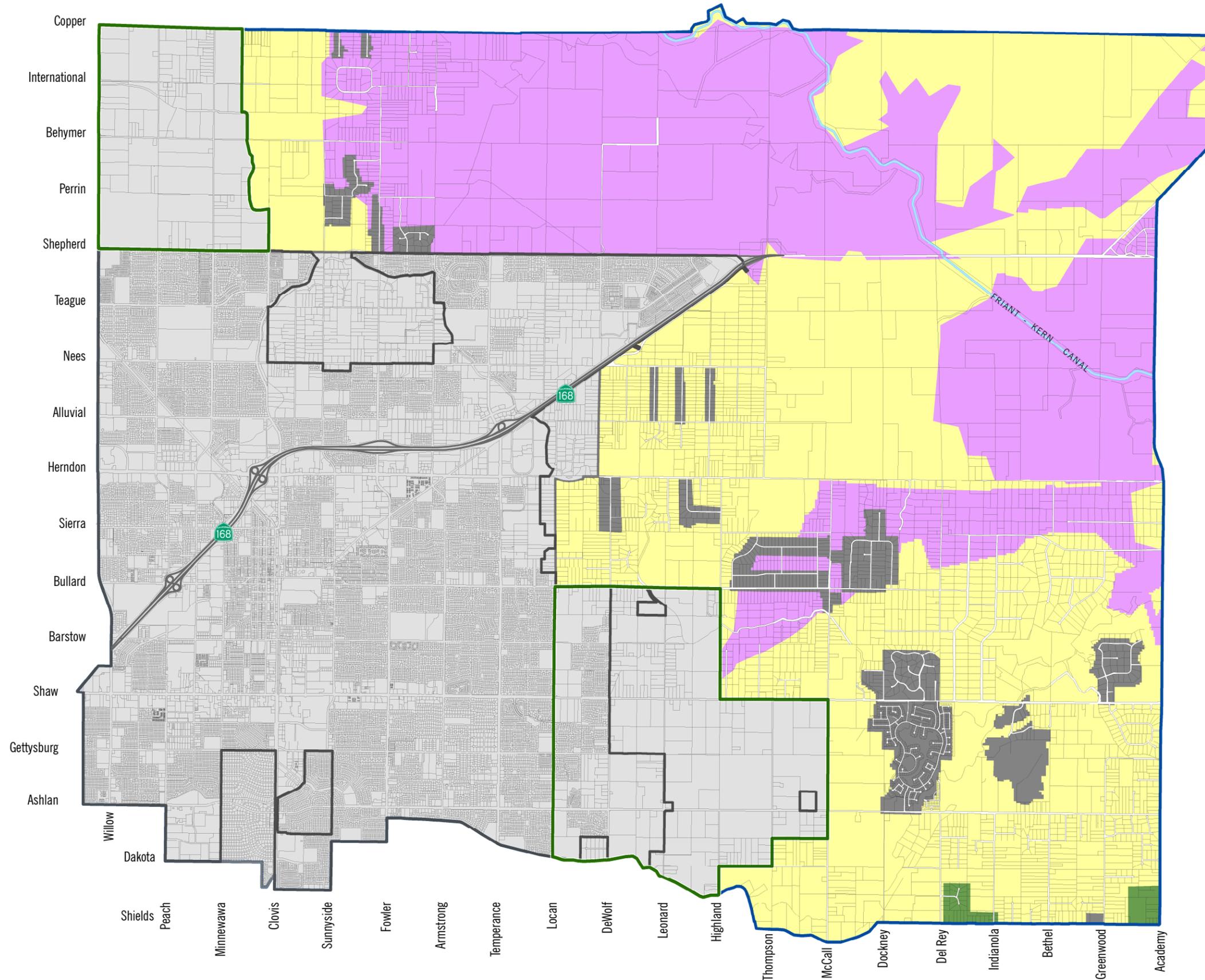
5.2.2 Thresholds of Significance

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

- AG-1 Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use.
- AG-2 Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- AG-3 Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).
- AG-4 Result in the loss of forest land or conversion of forest land to non-forest use.

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Figure 5.2-3



Strategic Farmland

- Very High (55-60)
- Medium (35-49)
- Low (<35)
- Urban
- Area Not Mapped
- Fria-Kern Canal
- City Boundary
- Sphere of Influence Boundary
- Urban Center Boundary
- Plan Area Boundary

Note:
Strategic Farmland not mapped within the City of Clovis & SOI

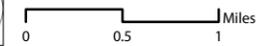


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Source: Model Farmland Conservation Program for Fresno County, 2008

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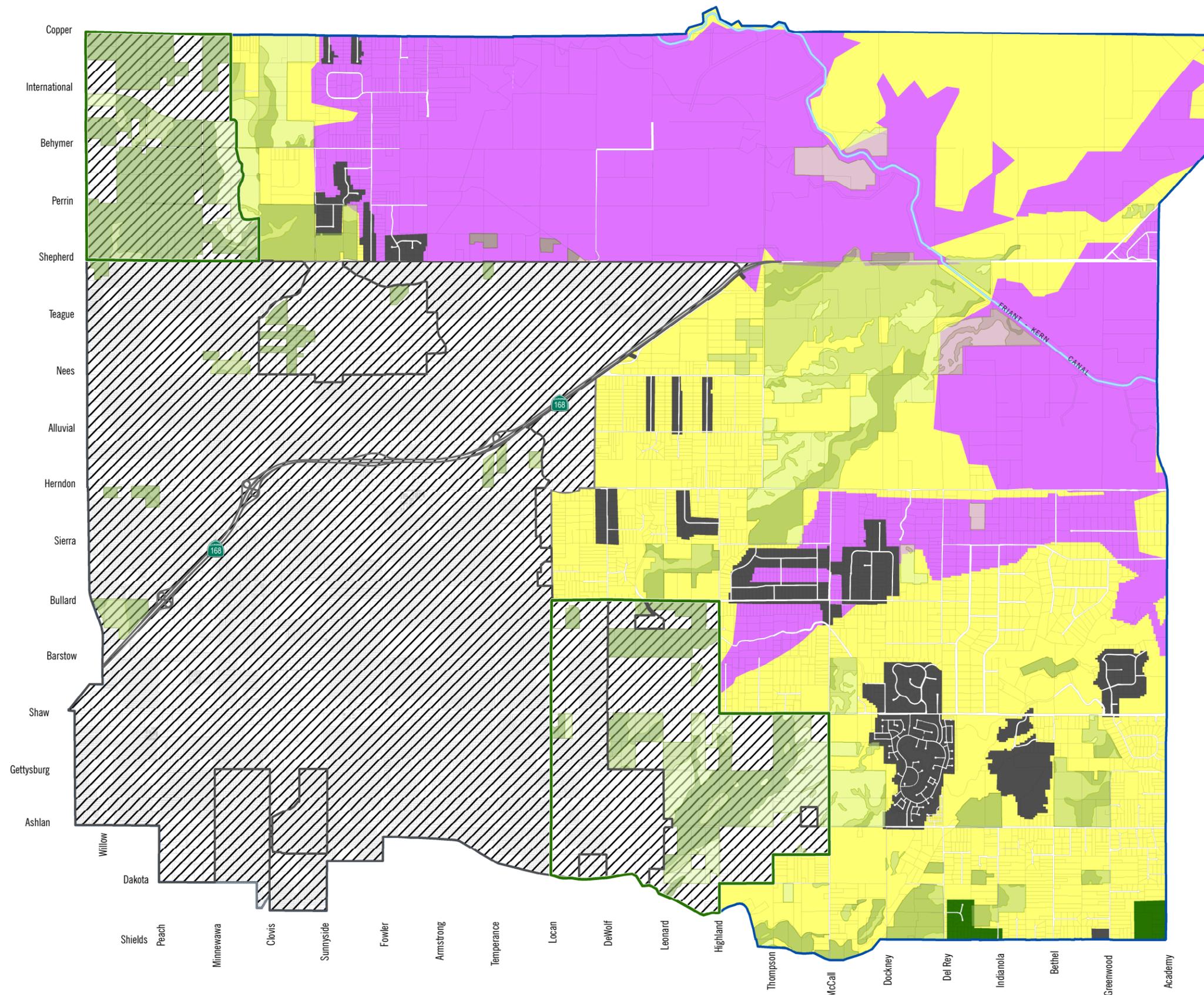
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Figure 5.2-4

Existing Important vs. Strategic Farmland



Strategic Farmland

- Very High (55-60)
- Medium (35-49)
- Low (<35)
- Urban

Area Not Mapped

Important Farmland 2010

- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland

Friant Kern Canal

City Boundary

Sphere of Influence Boundary

Urban Center Boundary

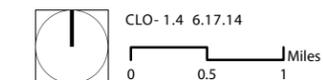
Plan Area Boundary

Note:
The California Department of Conservation farmland data used in analysis of converted farmland was updated to reflect development and entitled property since 2010.



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AG-5 Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

The Initial Study, included as Appendix A, substantiates that impacts associated with Threshold AG-3 would be less than significant. This impact will not be addressed in the following analysis.

5.2.3 Environmental Impacts

General Plan Update Buildout Scenarios

Impacts of two General Plan Update buildout scenarios are analyzed below:

- **2035 Scenario.** Although development would be allowed in accordance with the General Plan Land Use Plan anywhere within the Plan Area, this scenario assumes that the majority of development would occur in the City and SOI. Assumed development also encompasses a portion of the area east of Harlan Ranch and SR-168. The statistical analysis also assumes a limited amount of development beyond these focused areas of development. The 2035 scenario projections include development of 17,300 housing units in the subareas of Loma Vista, Northwest Urban Village Center, and Northeast Urban Village Center.
- **Full Buildout.** This scenario assumes full buildout of the projected land uses in the entire Plan Area. The acreage figures provided in Table 3-3 reflect the full buildout.

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

Impact 5.2-1: Buildout of the proposed General Plan Update would convert 2,651 acres of Prime Farmland, 1,528 acres of Farmland of Statewide Importance, and 1,411 acres of Unique Farmland to non-agricultural land uses. [Threshold AG-1]

Impact Analysis:

2035 Scenario

CEQA requires analysis of conversion on three categories of Important Farmland: Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. For the purpose of determining converted lands, the Surrounding Protected Resource Land Rating in the LESA Model considers open space and park uses compatible with agriculture use.

Implementation of the General Plan Update in the 2035 scenario would convert all of the Important Farmland in the City and SOI (2,352 acres in total), as shown in Table 5.2-3 (see Buildout discussion below), and some percentage of land in the non-SOI Plan Area. The totals converted in the City and SOI are: 1,751 acres of Prime Farmland, 319 acres of Farmland of Statewide Importance, and 462 acres of Unique Farmland. The conversion of these farmlands would be a significant impact.

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Full Buildout

Buildout of the proposed General Plan Update would convert the acres of Important Farmland shown in Table 5.2-3 and Figure 5.2-5, *Important Farmland Converted at General Plan Buildout*, to nonagricultural uses.

Table 5.2-3 Important Farmland Conversion by General Plan Buildout¹

Farmland Category	City of Clovis	Sphere of Influence	Non-SOI Plan Area	Plan Area Total
Prime Farmland	130	1,621	900	2,651
Farmland of Statewide Importance	81	238	1,209	1,528
Unique Farmland	9	453	949	1,411
Total	220	2,312	3,058	5,590

Source: California Department of Conservation, Division of Land Resource Protection 2010.

Notes: Acreages rounded.

Buildout of any General Plan land use designations other than Agriculture, Open Space, or Park is considered to be conversion to land use incompatible with continuing agricultural use.

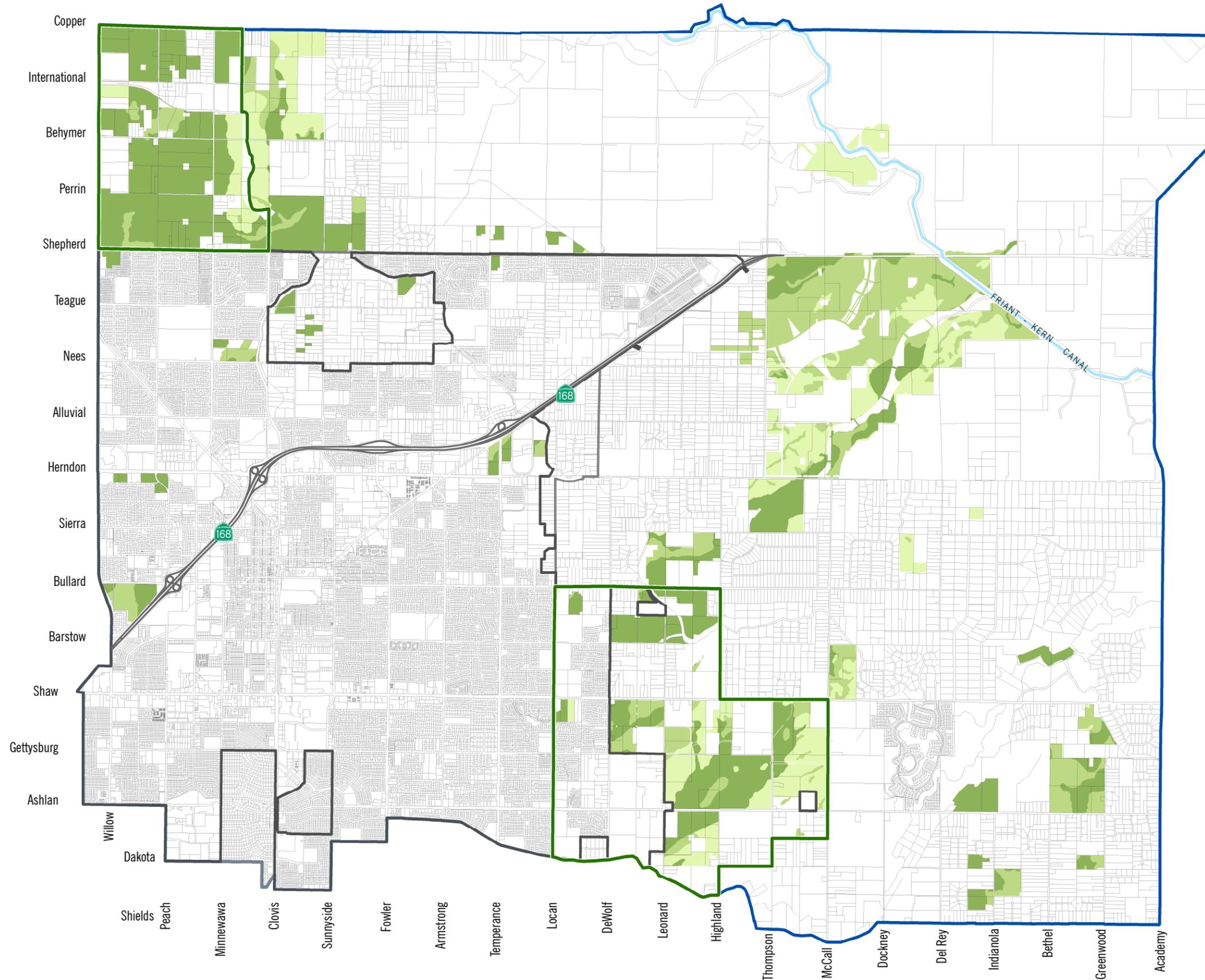
Buildout of the General Plan Update would convert 2,651 acres of Prime Farmland, 1,528 acres of Farmland of Statewide Importance, and 1,411 acres of Unique Farmland to nonagricultural land uses. By comparison, between 2006 and 2008, only 2,242 acres in these three categories were converted use in all of Fresno County. Conversion of farmland to nonagricultural land use would be a significant impact.

The Strategic Farmland analysis used in the Model Farmland Conservation Program for Fresno County provides another lens through which the conversion of farmland can be evaluated. As discussed in the Environmental Setting, based on the six factors combined to assign the relative strategic value of farmlands in the Plan Area, only 133 acres of land in the non-SOI Plan Area are identified as Very High. These areas are in the southeastern corner of the Plan Area, adjacent to the Plan Area boundary. Figure 5.2-6, *Strategic Farmland Converted at General Plan Buildout*, shows the intersection of the General Plan Update land use designations with the Strategic Farmlands. As shown, the Very High value farmlands would be converted to Rural Residential designations. This designation is defined as very low density residential uses and small-scale agricultural operations. Rural residential uses may be dispersed uniformly across the land or sited to leave more acreage for orchards, pastures, or other agricultural or open space activities.

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Figure 5.2-5

Important Farmland Converted at General Plan Buildout

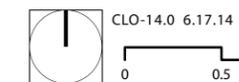


- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Fria-Kern Canal
- City Boundary
- Sphere of Influence Boundary
- Urban Center Boundary
- Plan Area Boundary



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Source: California Department of Conservation, Division of Land Resource Protection, 2010 (Modified 2014 by PlaceWorks)

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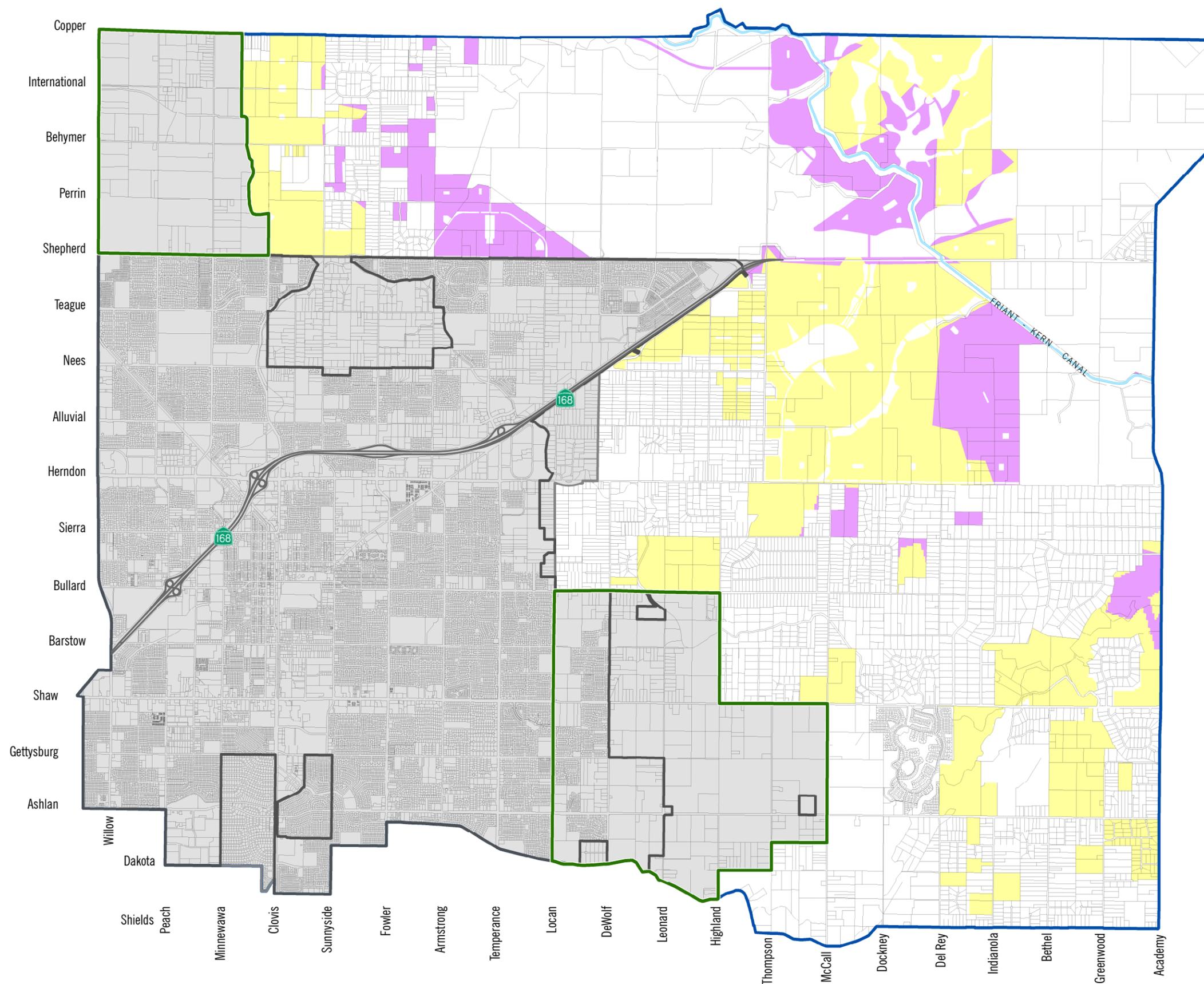
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Figure 5.2-6

Strategic Farmland Converted at General Plan Buildout



Medium (35-49)

Low (<35)

Area Not Mapped

Friant Kern Canal

City Boundary

Sphere of Influence Boundary

Urban Center Boundary

Plan Area Boundary

Note:
Strategic Farmland not mapped within the City of Clovis & SOI



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Impact 5.2-2 The General Plan Update would change the land use designation of 4,610 acres designated for agriculture to other land use designations. [Threshold AG-2]

Impact Analysis

2035 Scenario

This scenario assumes that the majority of development would occur in the City, SOI, and a portion of the area east of Harlan Ranch and SR-168. Under this scenario, 3,072 acres of agricultural lands would change to other land use designations. As shown in Table 5.2-4, the Full Buildout conversion of lands designated for agriculture use is 4,610 acres. Therefore, nearly two-thirds of the conversion of lands associated with implementation of the General Plan Update would potentially occur within the 2035 planning horizon. Since the exact location of parcels that would be converted is not known, the particular crops that would be lost cannot be precisely determined. However, Fresno County is the leading agricultural producer in the nation. Therefore, the change in land use designations and associated loss of agricultural production would be a significant impact.

Table 5.2-4 Land Designated for Agriculture to be Converted to Other Land Use Designations under Proposed General Plan Update

	City of Clovis	Sphere of Influence	Non-SOI Plan Area	Plan Area Total
Existing Agriculture Designation, Acres	None	389	9,810	10,199
Proposed Agriculture Designation, Acres	None	68	5,521	5,589
Acres to be Converted	Not Applicable	321	4,289	4,610
Converted Acres/ Existing Acres, Percent	Not Applicable	82.5%	43.7%	45.2%

Full Buildout

The proposed General Plan would convert 4,610 acres designated Agriculture under the existing General Plan to other land use designations. The converted acreage would be approximately 45 percent of the current 10,199 acres in the Plan Area designated for agriculture. In comparison to the rate of conversion of farmland in Fresno County—2,242 acres of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland converted to nonagricultural uses between 2006 and 2008—conversion of land designated for agriculture would be a significant impact.

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Impact 5.2-3 General Plan Update buildout would convert 3,047 acres of farmland bearing Williamson Act contracts to nonagricultural land uses. [Threshold AG-2]

Impact Analysis

2035 Scenario

Implementation of the General Plan Update would result in the conversion of county land currently zoned for agricultural use. The conflict with existing County zoning would be resolved through the annexation and rezoning process that project applicants would be required to undergo through the City and the Local Agency Formation Commission. The process would be used to establish new zoning on such lands that is consistent with the proposed land use designations in the General Plan Update. Through this process, inconsistencies with the existing zoning are reconciled, and therefore there would be no conflicts with existing zoning.

As shown in Table 5.2-2, 1,382 acres are currently under Williamson contracts in the SOI. Of these owners of 855 acres of Prime Agricultural Lands have filed for nonrenewal. Another 16 acres of non-Prime Agricultural Lands are in nonrenewal status. By recording the nonrenewal form, property owners have provided notice of their intention to exit a Williamson contract. These contracts will expire on or by 2022. Because these contracts were in nonrenewal status prior to adoption of the General Plan Update, there is no conflict with these Williamson Act contracts.²

An additional 510 acres of Prime Agricultural Lands in the SOI are subject to Williamson Act contract, as well as some portion of the non-SOI Plan Area that is part of the 2035 Scenario. Table 5.2-5 shows the anticipated conversion in the SOI and non-SOI Plan Area based on the land use designations in the General Plan Update. Of the 510 acres of Prime Agricultural Lands in the SOI, it is anticipated that 476 acres would convert to nonagricultural or agriculture-incompatible use. It is anticipated these owners would seek to terminate their contracts through the nonrenewal process or through contract cancellation. The rate of these occurrences would be related to the location and pace of development in the 2035 Scenario. As the amount of developable land in the area decreases, market pressures to file notices of nonrenewal and cancellations increase because of rising land values. These activities would conflict with the intended purpose of the Williamson Act and would constitute a significant impact.

² A comment letter on the Notice of Preparation from the Fresno County Local Agency Formation Commission requested that the DEIR consider the definition of Prime Agricultural Land per Government Code Section 56064. That definition closely resembles the definition of Prime Agricultural Lands per Government Code Section 51201, provided in Table 5.2-2. The analysis in this section is based on the CEQA-required definitions of Important Farmlands. Conversion of Prime Agricultural Land according to the latter definition is addressed in Impact 5.2-3 below.

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Table 5.2-5 Williamson Act Contract Farmland by General Plan Buildout

Contract Type ¹	Converted (GPU Designation incompatible with agriculture) or Not Converted ¹	City	Sphere of Influence	Non-SOI Plan Area	Total
P- Prime Agricultural Lands	Converted	None	476	660	1,136
	Not Converted		34	530	564
	Total	None	510	1,190	1,700
P-NR - Prime Agricultural Lands (Non-Renewal)	Converted	None	801	185	986
	Not Converted		16	144	160
	Total	None	855	329	1,146
NP- Non-Prime Agricultural Lands	Converted	None	1	403	404
	Not Converted		0	3,096	3,096
	Total	None	1	3,499	3,500
NP-NR - Non-Prime Agricultural Lands (Non-Renewal)	Converted	None	13	508	521
	Not Converted		2	61	63
	Total	None	15	569	584
Total	Converted	None	1,291	1,756	3,047
	Not Converted		52	3,831	3,883
	Total	None	1,343	5,587	6,930

Source: California Department of Conservation, Division of Land Resource Protection 2009

¹ GPU designations considered compatible with continuing agricultural use are agriculture, open space, and park.

Full Buildout

As with the 2035 Scenario, conflicts between land use designations in the non-SOI Plan Area and existing county zoning would be reconciled through the annexation process project by project. Therefore, there are no impacts in terms of conflicts with existing zoning.

Full Buildout of the proposed General Plan Update would convert 3,047 acres bearing Williamson Act contracts to nonagricultural or non-agricultural-compatible land uses, as shown below in Table 5.2-5.

Of the buildout area, 1,770 acres have filed nonrenewal notices (see Table 5.2-2). The majority of these lands (1,185 acres) are identified as Prime Agricultural Lands, including 855 acres in the SOI and 329 acres in the non-SOI Plan Area. Because property owners of these lands filed notices of nonrenewal prior to the adoption of the General Plan Update, there is no impact from project implementation in terms of conflicts with these contracts. However, as discussed in the 2035 Scenario, implementation of the General Plan Update would result in cancellation and nonrenewal of contracts on Prime Agricultural Lands where the land use designation is changed to a nonagricultural or agriculture-incompatible use.

As shown in Table 5.2-5, based on the designations in the General Plan Update, it is anticipated that 1,136 acres subject to Williamson Act contracts would convert. Given the public policy of protecting farmland embodied in the Williamson Act, the nonrenewal or cancellation of additional lands bearing these contracts to nonagricultural or incompatible uses would be a significant impact.

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Impact 5.2-4: Buildout of the General Plan Update would potentially impact riparian forests. [Threshold AG-4]

Impact Analysis:

2035 and Full Buildout Scenarios

The Plan Area supports some areas of riparian forest associated with portions of Dry Creek, Dog Creek, and Redbank Slough. Riparian forests are jurisdictional to the California Department of Fish and Wildlife (CDFW). As discussed in Section 5.4, *Biological Resources*, a Streambed Alteration Permit from the CDFW and mitigation for impacts would be required for projects impacting riparian forests. Implementation of Mitigation Measures 4-1 through 4-5 in Section 5.4 would reduce impacts to riparian forests to less than significant.

Impact 5.2-5: Buildout of the General Plan Update would cause other changes to the environment that could cause conversion of farmland to nonagricultural land uses. [Threshold Ag-5]

Impact Analysis:

2035 Scenario

This impact analysis is a qualitative assessment of factors used in the Site Assessment portion of the LESA Model respecting the Agriculture designation in the proposed General Plan Update. Those factors are:

- **Project Site Size:** Larger farming operations can provide greater flexibility in farm management and marketing decisions. Certain economies of scale for equipment and infrastructure can also be more favorable for larger operations. In addition, larger operations tend to have greater impacts on the local economy through direct employment, as well as impacts on support industries (e.g., fertilizers, farm equipment, and shipping) and food processing industries. The project site size rating also considers the capability of site soils for intensive agriculture.
- **Water Availability:** This factor considers effects on agricultural production such as changes in types of crops planted or reduction in acreage cultivated; the cost of water; and drought cycles.
- **Surrounding Agricultural Land:** Conversion of farmland on a particular site is considered a greater impact if a large portion of surrounding land is in agricultural production because it is likely to have greater indirect impacts, adding to pressure to convert the surrounding land to non-agricultural land uses.
- **Surrounding Protected Resource Land:** The Surrounding Protected Resource Land Rating is essentially an extension of the Surrounding Agricultural Land Rating. Protected resource lands are lands with long-term use restrictions compatible with or supportive of agricultural uses of land, including:
 - Williamson Act contracted lands
 - Publicly owned lands maintained as park, forest, or watershed resources

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- Lands with agricultural, wildlife habitat, open space, or other natural resource easements that restrict the conversion of such land to urban or industrial uses.

In this analysis, the Project Site Size, Surrounding Agricultural Land, and Surrounding Protected Resource Land factors are all considered to refer to the distribution of land designated for agriculture and the compatibility of land designated for agriculture with surrounding land use designations. Therefore, these three factors are analyzed here as a single factor, following the discussion of water availability

Water Availability

Agricultural water supply in the Plan Area is derived from groundwater and surface water sources, and 80 percent of all water use in Fresno County is for agricultural uses.

As discussed in Section 5.17, *Utilities and Service Systems*, the City lies within the Kings Groundwater Subbasin, which has been identified as critically overdrafted. Groundwater is drawn from 37 ground wells in the City, with a combined total pumping capacity of 50,460 gallons per minute (gpm). Two more wells are planned to bring an additional 3,500 gpm of capacity. With respect to recharge, the estimated sustainable annual yield of groundwater is the sum of natural groundwater and City-initiated recharge from storage ponds into the aquifer. Combined, these total 16,100 acre-feet per year (afy).³ Groundwater levels in the San Joaquin Valley are forecast to hit an all-time low due to persistent drought conditions, discussed below.

With respect to surface water, the City is almost entirely within the Fresno Irrigation District (FID), which obtains the majority of its water from Kings River. FID's average gross annual entitlement is 454,000 acre-feet (af). FID also holds a contract with the United States Bureau of Reclamation for 75,000 af of Class 2 water from the Friant Division of the Central Valley Project (CVP). Class 2 water is in excess of Class 1 and is therefore much less dependable.

Areas within the City's planned urbanized areas in the SOI and Non-SOI Plan Area are served by Garfield Water District or the International Water District. Garfield has a Class 1 CVP contract for 3,500 afy. The City expects half of this supply—the portion of the district within the City's SOI—to be added to its supply upon development. Since half of Garfield is within the City's sphere of influence, 1,750 acre-feet annually of supply could be expected to be added to the City's supply upon development.

2013–2014 Drought

The Clovis region and much of California is currently under severe drought conditions. FID ended water deliveries in water year 2013 on July 31 and in some areas on July 15; by contrast, water deliveries in 2010 and 2011 extended to October 31 of each year (FID 2013). FID is currently storing 13,000 acre-feet of water as an emergency water supply for several small San Joaquin Valley communities that may have little to no surface water or groundwater supplies available this year (FID 2014). FID expects to make deliveries in 2014 for six weeks, beginning on June 1 and ending on July 15. Depending on runoff, the deliveries may extend to the end of July. Depending on groundwater availability, farmers will rely on groundwater wells to supplement their supplies during the growing season.

³ One acre-foot is about 325,851 gallons.

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The US Bureau of Reclamation, operator of the Central Valley Project—a system of reservoirs, canals, and other water conveyance infrastructure serving the Sacramento and San Joaquin Valleys—announced on February 21, 2014, that it would deliver zero water in 2014 from Millerton Reservoir on the San Joaquin River (USBR 2014).

Groundwater depletion in the Central Valley between 2003 and 2010 is estimated at over 16 million acre-feet. Freshwater loss, including groundwater depletion, from the Sacramento and San Joaquin River Basins between November 2011 and November 2013 is estimated at about 16 million acre-feet. Past droughts in the Central Valley have caused reductions in planted acreage and higher food costs (UCCHM 2014).

Assessment

Continued agricultural production in Fresno County is expected to further deplete groundwater. Considering the overdraft condition of the Fresno Groundwater Basin and the year-to-year variability in surface water supplies in the San Joaquin and Kings Rivers, water supply is expected to be a constraint on agricultural production in the Plan Area during drought years. These conditions could also put a constraint on agricultural production during nondrought years.

Distribution of Agriculture Designations and Compatibility with Surrounding Land Use Designations

Distribution

Agriculture designations in the Plan Area under the proposed General Plan Update are almost entirely concentrated in three areas: the northeast corner of the Plan Area; along the west side of the future regional park in the north-central part of the Plan Area; and in the southeast part of the Plan Area next to the east SOI boundary (see Figure 3-5, *Proposed Land Use Plan*). Each of these areas is contiguous to an Agriculture designation. If agriculture designations were on small tracts interspersed amongst other land use designations, incompatibility between Agriculture designations and surrounding designations would contribute to causing conversion of these lands to nonagricultural use. The potential for that to factor to contribute to conversion is avoided by the three large contiguous areas of Agriculture designation.

Compatibility with Surrounding Land Use Designations

Land use designations surrounding the three areas in the Plan Area designated Agriculture are described below in Table 5.2-6. As shown in the table, the majority of proposed land use designations surrounding the three areas designated Agriculture are compatible with agricultural use. Therefore, compatibility with surrounding land use designations would not result in pressures for conversion of agricultural land to nonagricultural uses beyond those occurring generally in the urban-rural interface in Fresno County.

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Table 5.2-6 Land Use Designations Surrounding Areas Designated Agriculture

Agriculture-Designated Area and Location	Surrounding Land Use Designations		
	Direction from Agriculture Designation	Land Use Designation	Compatibility with Agriculture
A: North-Central Plan Area	North	Plan Area Boundary (Rural Residential and Agriculture ¹) and Rural Residential	Compatible
	East	Future Regional Park	Compatible
	South	Low-Density Residential	Low compatibility
	West	Rural Residential	Compatible
B: Northeast Plan Area	North	Plan Area Boundary (Agriculture ¹)	Compatible
	East	Plan Area Boundary (Agriculture ¹)	Compatible
	South	Rural Residential	Compatible
	West	Low-Density Residential, Open Space, Medium-Density Residential	Compatible (Open Space), Low compatibility (Low-Density Residential and Medium-Density Residential)
C: Southern Plan Area, next to east SOI Boundary	North	Planned Residential Community, Rural Residential, and Low-Density Residential	Compatible (Rural Residential), Low compatibility (Planned Residential Community and Low-Density Residential)
	East	Planned Residential Community and Rural Residential	Compatible (Rural Residential), Low compatibility (Planned Residential Community)
	South	Plan Area Boundary (Agriculture ¹)	Compatible
	West	Mixed-Use/Business Center; Low-Density Residential; Public/Quasi-Public Facilities	Compatible (Mixed Use/Business Center; Public/Quasi-Public Facilities); Low compatibility (Low-Density Residential)

¹ Land Use Designations from Fresno County General Plan (2000)

Assessment Summary

Water supply constraints associated with urban growth pressures and persistent drought conditions could contribute to conversion of areas designated Agriculture in the proposed General Plan Update to nonagricultural uses. These pressures likely exist with or without the General Plan Update. However, urban growth associated with implementation of the General Plan Update, in light of constrained water resources, could stimulate conversion of agricultural lands to urban uses due to higher land values and lower water needs. That said, as discussed in the Environmental Setting, Section 5.2.1, there is currently little agricultural production in the Plan Area. Therefore, though urban growth associated with implementation of the General Plan Update could reduce water supply for agricultural uses, this impact would be less than significant given the low levels of production currently in the Plan Area. The distribution of Agriculture designations and compatibility of Agriculture designations with surrounding designations would not cause substantial pressures for conversion of areas designated Agriculture to nonagricultural uses. Accordingly, this impact would also be less than significant.

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Full Buildout

The above analysis for the 2035 scenario applies to the full buildout as well.

5.2.4 Relevant General Plan Policies and Development Code Sections

The following are relevant policies of the proposed Clovis General Plan and Development Code Update that would reduce potential agricultural resource impacts of future development in the Plan Area.

5.2.4.1 GENERAL PLAN

Land Use Element

Goal 3: Orderly and sustainable outward growth into three urban centers with neighborhoods that provide a balanced mix of land uses and development types to support a community lifestyle and small town character.

Goal 4: Orderly development of the General Plan outside of the city boundary.

- **Policy 3.8 Land use compatibility** - Within Urban Centers, new development that is immediately adjacent to properties designated for rural residential and agricultural uses shall bear the major responsibility of achieving land use compatibility and buffering.
- **Policy 3.9 Connected development** - New development in Urban Centers must fully improve roadway, pedestrian, and bicycle systems within and adjacent to the proposed project and connect to existing urbanized development.
- **Policy 4.4** Participate in regional efforts, such as the Fresno County Model Farmland Conservation Program or the San Joaquin Valley Greenprint, to establish regional farmland conservation measures, which might include agricultural preserves or a farmland conservation easements program.
- **Policy 6.2 Smart growth** - The city is committed to the following smart growth goals.
 - G. Preserve open space, farmland, natural beauty, and critical environmental areas

Circulation Element

- **Policy 1.8 Network completion** - New development shall complete the extension of stub streets planned to connect to adjacent streets.
- **Policy 2.1 Level of service** - Until the city adopts transportation impact analysis guidelines, the following level of service (LOS) standards shall apply:
 - B. Allow exceptions on a case-by-case basis where lower levels of service would result in other public benefits, such as:
 - i. Preserving agriculture or open space land

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Open Space and Conservation Element

Goal 2: Natural, agricultural, and historic resources that are preserved and promoted as key features for civic pride and identity.

- **Policy 2.1 Stewardship** - Promote responsible planning and management of land and resources among property owners.
- **Policy 2.4 Agricultural lands** - Preserve the city's agricultural legacy through the Agricultural land use designation, memorialize agricultural history and culture, and facilitate thoughtful conversion of lands to development.
- **Policy 2.5 Right to farm** - Support, encourage, and protect agricultural operations within Clovis and recognize their right to farm.

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5.2.5 Existing Regulations

5.2.5.1 STATE

- Farmland Mapping and Monitoring Program (California Government Code Section 65570)
- Williamson Act (California Government Code Sections 51200 et. seq.)

5.2.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, the following impacts would be less than significant for both 2035 Scenario and Full Buildout: Impact 5.2-4 and 5.2-5.

Without mitigation, the following impacts would be **significant**:

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2035 Scenario

- **Impact 5.2-1** Development in accordance with the General Plan land use designations would convert all of the important farmland within the City limits and SOI to nonagricultural land uses, including: 1,751 acres Prime Farmland, 319 acres of Farmland of Statewide Importance, and 462 acres of Unique Farmland. Additional acres within the non-SOI area would also likely be converted to nonagricultural uses within the 2035 Scenario.
- **Impact 5.2-2** Anticipated development within the 2035 time horizon would convert 3,072 acres designated for agriculture to other land use designations.
- **Impact 5.2-3** Within the 2035 time horizon, development in accordance with the General Plan Update within the SOI would result in conversion of 476 acres of prime farmland and 16 acres of nonprime farmland bearing Williamson Act contracts to nonagricultural land uses.

Full Buildout

- **Impact 5.2-1** Buildout of the proposed General Plan Update would convert 2,651 acres of Prime Farmland, 1,528 acres of Farmland of Statewide Importance, and 1,411 acres of Unique Farmland to nonagricultural land uses.
- **Impact 5.2-2** General plan update buildout would convert 4,610 acres designated for agriculture to other land use designations.
- **Impact 5.2-3** General Plan Update buildout would convert 3,047 acres of farmland bearing Williamson Act contracts to nonagricultural land uses.

5.2.7 Mitigation Measures

2035 Scenario and Full Buildout

Impacts 5.2-1, 5.2-2, and 5.2-3

As stated above, City policies seek to preserve the agricultural legacy of Clovis by facilitating thoughtful conversion of farmland, and supporting “right to farm” and regional conservations efforts such as agricultural preserves and consideration of agricultural easements program. Even with implementation of these policies, the impacts of the General Plan Update on Important Farmland, agriculture conversion and Williamson Act contracts are significant.

- 2-1 Project applicants for properties that include 20 acres or more designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland shall be required to prepare or fund an agricultural resource evaluation prior to project approval. The resource evaluation shall use generally accepted methodologies (such as the Land Evaluation and Site Assessment Model) to identify the potentially significant impact of the loss of agricultural land as well as the economic

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viability of future agricultural use of the property. If the conversion is deemed significant, the City shall require mitigation at a 1:1 ratio of converted to preserved acreage, or payment of its valuation equivalent if a fee mitigation program is established. Conservation mitigation could be achieved alternatively through a regional agricultural preservation program, such as the Model Farmland or SJV Greenprint, if adopted by the City.

5.2.8 Level of Significance After Mitigation

Impacts 5.2-1, 5.2-2, and 5.2-3

Implementation of the General Plan Update would result in significant, unavoidable impacts in these three impact areas. Implementation of Measure 2-1 would not fully mitigate the direct loss of farmlands associated with the implementation of the General Plan Update because there would still be a net reduction in the total amount of land suitable for agricultural use. The impacts would therefore be significant and unavoidable.

5.2.9 References

- American Farmland Trust (AFT). 2008, December. Model Farmland Conservation Program for Fresno County. http://www.fresnocog.org/files/FarmlandConservation/Fresno%20County%20Report_01-06-09.pdf.
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