

4.6 AGRICULTURAL RESOURCES

INTRODUCTION

This section addresses the significance of the impact of converting the existing agricultural land located within the boundary of the RiverPark Specific Plan Area to urban uses. This section also examines the consistency of the Project with the policies of City of Oxnard 2020 General Plan. Potential impacts on nearby agricultural areas is also addressed. Sources utilized in this section include the 2020 General Plan (November 1990), the 2020 General Plan EIR (June 1990), Ventura County Annual Crop Report (2000), the State Department of Conservation Farmland Conversion Report (1998), the Soil Survey: Ventura, California, (April 1970) and the State Important Farmlands Map.

ENVIRONMENTAL SETTING

There are two systems used by the United States Soil Conservation Service (SCS) to determine a soil's agricultural productivity. The two systems are the Soil Capability Classification and the Storie Index Rating System. In general, the prime soil classifications of both systems indicate the absence of soil limitations, which, if present, would require the application of management techniques (e.g., drainage, leveling, special fertilizing practices) to enhance production.

Federal and State Farmland Classifications

Soil Capability Classification

The Soil Capability Classification System takes into consideration soil limitations and the way in which soils respond to treatment. Capability classes range from Class I soils, which have few limitations for agriculture, to Class VIII soils, which are unsuitable for agriculture. Class I soils give top yields with a minimum of management skills, while yields of Class II land can equal those of Class I with implementation of minor management practices. Generally, as the ratings of the capability classification system increase, crop yields and profits are more difficult to obtain.

Storie Index Rating System

The Storie Index Rating system ranks soil characteristics according to their suitability for agriculture from Grade 1 soils (80 to 100 rating), which have few or no limitations for agricultural production to

Grade 6 soils (less than 10), which are not suitable for agriculture. Under this system, soils deemed less than prime can operate as prime soils when limitations such as poor drainage, slopes, or soil nutrient deficiencies are partially or entirely removed.

State of California Department of Conservation Classifications

Using Soil Conservation Service soil classifications, discussed above, the California Department of Conservation (DOC) and the California Association of Resource Conservation Districts translate soil survey data into an “Important Farmland Series” of maps for the State’s agricultural counties. The purpose of the DOC’s Farmland Mapping and Monitoring Program (FMMP), which updates its maps biennially, is to provide land use conversion information for decision makers to use in their planning for the present and future of California’s agricultural land resources.¹ Thus, these classifications focus only on those lands that have been recently farmed. Land not recently farmed does not show up on the Important Farmland Series of maps.

The DOC, in its *Farmland Conversion Report* published in June 1994, has clarified the way unfarmed agricultural lands are removed from their important farmland maps. Before removing unfarmed land from the maps, the DOC now waits two mapping cycles (four years) rather than one to make it easier for the DOC to track changes.

The important farmland maps and the Advisory Guidelines for the Farmland Mapping and Monitoring Program identify five agriculture-related categories: prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and grazing land. Each is described below.

Prime Farmland

Prime farmland is land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date of 1992 (or since 1988).

Farmland of Statewide Importance

Farmland of statewide importance is land similar to prime farmland, but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture. The land must have been used for

¹ Department of Conservation: *Farmland Conversion Report: 1996 to 1998*, p.1. Sacramento, California, 2000.

the production of irrigated crops at some time during the two update cycles prior to the mapping date (or since 1988).

Unique Farmland

Unique farmland is land of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. The land must have been cultivated at some time during the two update cycles prior to the mapping date (or since 1988).

Farmland of Local Importance

Farmland of local importance is land of importance to the local agricultural economy, as determined by each County's Board of Supervisors and a local advisory committee. According to the *Farmland Conversion Report*, farmland of local importance in Ventura County includes soils that are listed as prime farmland or farmlands of statewide importance that are not irrigated, and soils growing dryland crops (beans, grain, dryland walnuts, and dryland apricots).

Grazing Land

Grazing land is land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for this category is 40 acres.

Contribution of Agriculture to the Ventura County Economy

Farming in Ventura County has been, and continues to be, a major contributor to the nation's food supply as well as a vital component of the rural lifestyle, which exists throughout much of the County. Besides providing food for the nation's tables, agriculture generates a substantial number of jobs ranging from crop production to processing, shipping, and other related industries.

Based on the climate and quality of soils, Ventura County is recognized as one of the principal agricultural counties in the State, with gross revenues from the sales of agricultural commodities of \$1.05 billion in 2000.² Ventura County ranks number ten among the highest in agricultural revenues of

² Office of Agricultural Commissioner: *Annual Crop Report: 2000*, p. 2. Santa Paula, California: 2001.

the 58 agricultural counties in the state, and approximately 19,600 jobs were generated in 2000 by agriculture in the County. In comparison, the County contained a total of 392,500 jobs in 2000.³

In 2000, the ten leading crops in the County were lemons, strawberries, celery, avocados, nursery stock, avocados, cut flowers, tomatoes, peppers, Valencia oranges, and lettuce, with lemons holding the highest value at \$187,166,000.⁴ Within the City of Oxnard, row crops such as celery, cabbage, cauliflower, broccoli, peppers, lima beans, strawberries, lettuce and tomatoes predominate.

Agriculture has remained economically viable in the County, in spite of pressures such as increased agricultural land values, increased water cost, and compatibility problems with urban uses, because of the area's climate, soils, and air quality. The total value in constant dollars of Ventura County's agricultural production has been increasing since the 1930's.⁵

Farmland Conversion

One of the basic underlying premises of agricultural conversions is that the proximity of agricultural land to urban uses increases the value of the land either directly through formal purchase offers, or indirectly from recent sales in the vicinity. This is evidenced by the fact that property values, as measured by the County Assessor's office, are higher adjacent to the urban fringe.⁶ One exception is in the case of a roadway intersection where future urban growth is expected, or near areas where land use designations are predicted to change.

One study suggests that in response to increased land values, the types of crops on the land shifts to higher yield, higher value crops. The intent being to maximize the cash yield from the land available, otherwise the land will be converted to a higher and better use. On the surface, this appears to be partially the case in much of Ventura County. For example, Valencia orange production dropped from about 16,000 acres in 1975 to 9,360 acres in 2000.⁷ During this same time, higher value crops such as avocados, strawberries, broccoli, celery, and specialty lettuce have increased substantially.⁸ It should be noted that numerous factors may also contribute to this shift, including

³ California Department of Finance, 2000 County Profiles for Ventura County. (http://www.dof.ca.gov/HTML/FS_DATA/profiles/pf_home.htm), July 2001.

⁴ Office of Agricultural Commissioner: *Annual Crop Report: 2000*, p. ii. Santa Paula, California: 2001.

⁵ Ventura County Agricultural Land Trust and Conservancy and the California State Coastal Conservancy: *The Value of Agriculture to Ventura County: An Economic Analysis*, March 1996.

⁶ Ibid.

⁷ Office of Agricultural Commissioner: *Annual Crop Report: 2000*, Santa Paula, California: 2001.

⁸ Ventura County Agricultural Land Trust and Conservancy and the California State Coastal Conservancy: *The Value of Agriculture to Ventura County: An Economic Analysis*, March 1996.

market forces, pests, as well as climate and soil types, which limit the types of crops that can be cultivated in an area.

The amount of agricultural land converted to other uses has been monitored since 1984 by the DOC based on information reported by the County Agricultural Commissioner. This information is presented below in **Table 4.6-1**.

Table 4.6-1
Conversion of Farmlands within Ventura County 1988-1998

Year	Prime Farmland	Land of Statewide Import.	Unique Farmland	Farmland of Local Importance	Grazing	Total Agriculture
1990	53,591	38,299	22,510	11,691	210,068	336,159
1992	53,300	38,299	22,510	11,691	210,068	336,159
1994	53,042	37,883	22,512	11,416	209,091	333,900
1996	52,141	37,611	22,437	11,148	208,752	332,089
1998	51,817	37,7000	22,644	11,076	207,853	331,088
2000	51,624	37,613	22,608	11,097	206,693	329,635
10 Yr. Diff.	1,967	-686	134	615	2,215	5,071
Annual Avg.	-266.5	-137	19.6	-118.8	-475	1,304.8
%Diff.	4%	3%	.6%	6%	1%	2%

Source: Department of Conservation, Farmland Conversion Reports 1988 to 1990, 1992 to 1994, 1996 to 1998, 1998 to 2000. (Sacramento, California).

As shown, the total amount of agricultural land within the County declined 2 percent during the ten-year period from 1990 to 2000. This equates to an average loss of 266 acres of prime farmland annually and 916 acres of all farmland categories annually. The rate of decline for Prime Farmland and Land of Statewide Importance, which are the land categories with the greatest potential for agricultural productivity, stood at 4 percent and 3 percent, respectively, during this same period. When considering the combined categories of important farmland, the loss over this ten-year period amounts to 4 percent of land within this combined category. It should be noted that for the nine-year period between 1984 and 1993, crop yields on a per acre basis have increased for the County's leading crops.⁹ During this period, celery crop yields have increased 22.5 percent, strawberries have increased 2.6 percent, lemons have increased 47 percent, Valencia oranges have increased 48 percent, and the yield for avocados increased 59 percent. This increase can be attributed to improved farming techniques, seed stock, and other production related factors.

⁹ Ventura County Agricultural Land Trust and Conservancy and the California State Coastal Conservancy: *The Value of Agriculture to Ventura County: An Economic Analysis*, March 1996.

Plans and Policies for Agricultural Land

City of Oxnard 2020 General Plan

The City of Oxnard has consistently administered policies and programs designed to preserve a majority of the agricultural land in the City's Planning Area while accommodating anticipated growth. The Open Space/Conservation, Growth Management, Land Use, Economic Development and Community Design Elements of the *2020 General Plan* address the City's policies on agricultural land.

The *2020 General Plan Open Space/Conservation Element* recognizes the importance of the agricultural production lands in the City's Planning Area and includes policies for the protection of these lands. The maintenance and enhancement of natural resources and open space is identified as a goal of the *General Plan*, and the protection of agricultural lands from premature and unnecessary urbanization is set forth as an objective.

In addition, the *2020 General Plan* contains objectives and policies promoting the preservation of agricultural land within the City's Planning Area in the *Growth Management, Land Use, Economic Development, and Community Design Elements*. An objective in the *Growth Management Element* calls for the creation of an appropriate balance between urban development and the preservation of agricultural uses within the City's Planning Area. This objective further states that development is only allowed within the City Urban Growth Boundary (CURB) while leaving the remainder in Resource Protection, Open Space, or Agricultural designations. Objectives in the *Land Use Element* call for limiting the urbanized area of the City, facilitating a permanent greenbelt between the City and neighboring cities, and preserving permanent agricultural land within the City's Planning Area. The *Economic Development Element* contains policies supporting the continued contribution of agriculture to the economy and lifestyle of the City and encouraging the retention of and reinvestment in agriculture. An objective in the *Community Design Element* states that the unique coastal and agricultural character of the City should be maintained.

The primary method identified in the *2020 General Plan* when it was adopted in 1990 for preserving agricultural land was the City's participation in greenbelt agreements. The *Oxnard-Camarillo Greenbelt* was originally established by the Cities of Oxnard and Camarillo in mid-1982. The County Board of Supervisors endorsed the Greenbelt in late 1982. As discussed above, this greenbelt was amended in 1984 to add the Del Norte area. This greenbelt agreement includes 29,200 acres. Of this total, approximately 12,905 acres are located within the City of Oxnard's Planning Area.

The *Open Space/Conservation Element* also called for consideration of a new greenbelt in the northwestern portion of the City's Planning Area. This new 4,600-acre greenbelt, called the *Ventura-Oxnard Greenbelt*, was created by the Cities of Oxnard and Ventura in 1993. The Ventura County Board of Supervisors joined this greenbelt agreement in early 1994. The Ventura County LAFCO also endorsed this greenbelt agreement in early 1994. This greenbelt does not include the City's Planning Reserve Area located north of Gonzales Road and east of Victoria Avenue, within which is the RiverPark Specific Plan Area.

The policies in *Open Space/Conservation Element* related to the preservation of agricultural land also call for the City to support other mechanisms for the preservation of agricultural land, including the use of Williamson Land Conservation Act contracts, purchase of conservation easements, and adoption of a right-to-farm ordinance.

Aside from greenbelt agreements, the City's Save Open Space and Agriculture Resources (SOAR) Ordinance, which was passed in November 1998, is another method used by the City to preserve its agricultural resources. The SOAR ordinance consisted of an amendment to the *2020 General Plan* to create a City Urban Restriction Boundary (CURB) and a City Buffer Boundary (CBB). The purpose of the SOAR Ordinance is to ensure that Agriculture, Open Space, and Rural-designated lands are not prematurely or unnecessarily converted to other uses. Under the SOAR Ordinance, the City would restrict urban services and urbanized uses of lands to within the CURB Line through the year 2020 and requires city voter approval before any Agriculture-designated land within the CBB, and outside the CURB can be developed under the City's jurisdiction for urban uses. The City Council may amend the CURB to include land contemplated for construction of public potable water facilities, public schools, public parks, or other government facilities, or to include certain development projects and those that have obtained approval as of the effective date of the SOAR Ordinance, a vested right pursuant to state or local law, all uses exempted from the provisions of the *General Plan Amendment*, but only to the minimum amount of land reasonably necessary to accommodate said uses.¹⁰

As shown in **Figure 4.6-1**, the CURB is established generally coterminous with and in the same location as the Sphere of Influence line established by the Local Agency Formation Commission (LAFCO) as it existed as of January 1998. Of the 23,178 acres of agricultural land located in the City's Planning Area at the time the SOAR Ordinance was approved, the build-out of the *2020 General Plan* would result in the conversion of approximately 3,729 acres of this land, leaving 19,449 acres of agricultural land in the City's Planning Area. As shown, the City of Oxnard *General Plan* provides for the preservation of most

¹⁰ Section 3.6, Oxnard SOAR Ordinance, November 1998.

of the agricultural land within the City's Planning Area while allowing some conversion of agricultural land to accommodate anticipated growth.

The Williamson Act

The California Land Conservation Act, also known as the Williamson Act, was adopted in 1965 in order to encourage the preservation of the state's agricultural lands and to prevent its premature conversion to urban uses. In order to preserve these uses, this act established an agricultural preserve contract procedure by which any county or city within the state taxes landowners at a lower rate using a scale based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. In return, the owners guarantee that these properties would remain under agricultural production for a ten-year period. This contract is renewed automatically unless a notice of non-renewal is filed by the owner. In this manner, each agricultural preserve contract (at any given date) is always operable at least nine years into the future. No Williamson Act contracts exist in the Specific Plan Area.

County GP/El Rio Area Plan

The agricultural land located east of Vineyard Avenue and north of the El Rio Community is located outside the City's CURB and is under the jurisdiction of the County of Ventura. This County's land use policies for this area are contained in the County *General Plan* and the El Rio Area Plan, a component of the County *General Plan*.

Preservation and protection of irrigated agricultural lands to assure the continued availability of such lands for the production of food and fiber is a stated goal under the County *General Plan*. Specific policies to achieve that goal include: planning development on land designated as Prime or of Statewide Importance to remove as little land from agricultural production as possible and to minimize impacts on topsoil; preservation of agricultural land by retaining and expanding the existing Greenbelt Agreements and encouraging the formation of additional Greenbelt Agreements; and, regulating development adjacent to agricultural-designated lands so as to minimize conflicts with agricultural use of those lands.¹¹ In addition, the County adopted its own SOAR Ordinance for unincorporated areas of the County in November 1998. The County SOAR Ordinance requires countywide voter approval of any change to the County *General Plan* involving the Agricultural, Open Space, or Rural designations or any changes to a County *General Plan* goal or policy related to those land use designations.

¹¹ County of Ventura Planning Division: *Ventura County General Plan*, "Resources Element," p.22. Ventura, California: December 1994.

Figure 4.6-1
Greenbelts and CURB and CBB Boundaries

The El Rio Area Plan further specifies the County's goals and policies for the unincorporated area near the Specific Plan Area. Preservation and protection of irrigated agricultural lands in the El Rio/Del Norte area and minimizing incompatibilities between agricultural operations and other land uses are stated goals. Specific policies to achieve that goal include: designating land outside the Existing Community- or Rural-designated areas within the El Rio/Del Norte Area Plan boundary which is currently in, or suitable for agricultural production as Agriculture and zoned such areas Agricultural Exclusive (A-E), prohibiting conflict of discretionary development located on land designated as Agricultural with the agricultural uses of those land, conditioning discretionary development adjacent to Agricultural designated land to ensure that impacts on the agricultural uses are minimized, requiring discretionary, non-agricultural land uses adjacent to Agricultural designated land to establish buffers, conditioning preservation of topsoil for reuse for discretionary development on lands containing Prime farmland or Farmland of Statewide Significance agricultural soils, and requiring evaluation regarding the feasibility of dedicating land or a conservation easement or cash-in-lieu fees to preserve agricultural land which is comparable to any land which would be permanently lost due to discretionary development on lands containing Prime farmland or Farmland of Statewide Significance agricultural soils.

On-Site Characteristics

Important Farmlands

The State Important Farmland Map for the Specific Plan Area and surrounding areas is shown in **Figure 4.6-2**. Presently, only the approximate 155 acres of agricultural land in RiverPark Area 'A' is mapped as farmland. This portion of the Specific Plan Area is mapped as Prime Farmland. The other parts of the Specific Plan Area are mapped as "Urban and Built-Up Land" and "Other Land."¹²

Agricultural Land within the Specific Plan Area

Figure 4.6-3 shows the location of existing agricultural land in the Specific Plan Area. As shown, approximately 155 acres of agricultural land is located in RiverPark Area 'A'. In addition to this agricultural land in RiverPark Area 'A', there is a small amount of agricultural land in RiverPark Area 'B'. As shown, there is a small strip of agricultural land located between Vineyard Avenue and El Rio Retention Basin No. 2. This strip includes 16 acres located on the Retention Basin site and a small 3-

¹² The current State Important Farmland Map for the Oxnard Quadrangle shows the Large Woolsey Mine Pit as Unique Farmland and the Small Woolsey, Vickers and Brigham Mine Pits as Farmland of Statewide Importance. This mapping error was reported to Kerri Kisko of the State Department of Conservation Farmland Mapping and Monitoring Program on October 29, 2001.

acre parcel immediately north of this parcel. A portion of the bottom of El Rio Retention Basin No. 2 is also currently being farmed.

At the time the County of Ventura acquired the El Rio Retention Basin No. 2 site, the soils on this sites was mapped as Prime Farmland. As mitigation for the impact of the construction of the retention basin on this agricultural land, the topsoil from the basin was temporarily stockpiled and then returned to the bottom of the completed basin. Basin 2 and the adjacent 16 acres along Vineyard Avenue are leased for agricultural use by the County. Presently, the farmer leasing this site from the County is farming the 16 acres on Vineyard and approximately 35 acres of the bottom of the 49-acre retention basin. The farmer grows in the bottom of the basin at his own risk, as the basin could be inundated with runoff during a storm event.

While the land at the bottom of El Rio Retention Basin No. 2 is marginal farmland, due to the chance of flooding, the portion of the basin currently being farmed is considered as agricultural land for purposes of this analysis. With this land, a total of 209 acres of agricultural land is located within the Specific Plan Area. All of the agricultural land within the Specific Plan Area is currently under cultivation with strawberries.

PROJECT IMPACTS

Thresholds of Significance

Based on Appendix G of the CEQA *Guidelines*, the City of Oxnard considers impacts on agricultural land to be significant if:

- a project converts prime farmland, farmland of statewide importance, and/or unique farmland, as shown on the State Important Farmlands maps, to non-agricultural use;
- conflicts with a Williamson Act contract
- or involves other changes in the existing environment which could result in the conversion of prime farmland, farmland of statewide importance, and/or unique farmland to non-agricultural uses.

Figure 4.6-2
State Important Farmland Map

Figure 4.6-3
Existing Agricultural Land in the Specific Plan Area

Direct Impacts

Conversion of Agricultural Land and Soils

The 155 acres of agricultural land in RiverPark Area 'A' is mapped as Prime Farmland. The 54 acres of land currently being farmed in RiverPark Area 'B' is not mapped as farmland on the State Important Farmland Maps. Based on the thresholds defined for this analysis, the loss of the 155 acres of agricultural land in RiverPark Area 'A' is a significant impact. The loss of the 54 acres of land currently being farmed in RiverPark Area 'B', consisting of a 19 acres of farmland along Vineyard Avenue and 35 acres on the bottom of the retention basin, is not a significant impact.

The most recent data indicates that the County contains a total of 112,159 acres of prime farmland, farmland of statewide importance, and unique farmland.¹³ Most of this land is classified as prime soils. The conversion of the Specific Plan Area from farmland to the proposed uses would reduce the total amount of these farmland types within the County by approximately 0.14 percent.

It should be noted that the conversion of the agricultural land in RiverPark Area 'A' has been previously considered by the City at three different times. This impact was considered by the City in 1986 when the Oxnard Town Center Specific Plan was proposed. In 1990, conversion of this agricultural land to urban uses was considered when the *2020 General Plan* was adopted by the City. Conversion of this land was considered again when the City reviewed the Historic Enhancement of Oxnard (HERO) redevelopment project in 1997. Environmental Impact Reports were prepared for all three of these land use policy projects that identified the conversion of this land to urban uses as a significant impact. The City found the benefits of these projects outweighed this impact on each of these three occasions and a Statement of Overriding Considerations was adopted.

Indirect & Secondary Impacts

Economic Loss

The loss of agricultural productivity during build-out of the Specific Plan would reduce total revenues from crop production, and incrementally reduce the volume of produce that is processed and shipped at local facilities. At the request of the Ventura County Agriculture Commission mentioned in the Notice of Preparation the following analysis examines the monetary effects of this crop loss.

¹³ Department of Conservation, *Farmland Conversion Reports 1996 to 1998* (Sacramento, California).

The site is suitable for growing a number of crops, including flowers, fruit, vegetables, and sod. Revenue generated by agricultural production on the property could vary considerably dependent upon the type and amount of crops under cultivation. There could be several different types of crops grown on a particular parcel of land within the Specific Plan Area during a given year. Further, various parcels may also lie fallow for part of the year. Given this, in order to calculate a reasonably accurate crop production value the property was systematically surveyed to determine if any perennial crops were found on the property. These were assumed to remain constant throughout a given year.

The results of a field survey found that approximately 209 acres of land was cultivated with strawberries. The value of this crop was then calculated based on the latest dollar value identified in the *Ventura County Agricultural Commissioner Annual Crop Report (2000)*. Using a generation factor of 31.00 tons of strawberries per acre, and a unit price of \$960.24 per ton, the annual crop value of strawberries per acre was \$29,767.44 in 2000. The total annual crop value for the 209 acres is estimated at approximately \$6,221,000 based on the above.

The reduction in harvested acres would create incrementally fewer economic opportunities for support industries. Based on a study which examined the degree of dependence of Ventura County agricultural support industries on the County's crop production, it was concluded that these industries can withstand up to a 37 percent reduction in total crop acres prior to closing or leaving the County.¹⁴ At the time the study was prepared, agricultural land within the County totaled 101,483 acres. Based on the above, the point at which support industries would be significantly affected would occur when the amount of farmland under cultivation within the County is reduced to 63,612 acres (37 percent of 101,483). Currently, there is 112,159 acres of farmland mapped in Ventura County on the State Important Farmland Maps. While the conversion of the Specific Plan Area from agricultural to urban uses would incrementally decrease the amount of farmland under cultivation in the County, this would not significantly impact the supporting agricultural industries based on the conclusions contained in this study.

Impacts on Nearby Agricultural Areas

The nearest agricultural land to the Specific Plan Area is located east of Vineyard Avenue and north of the El Rio Community. The closest residential areas proposed in the RiverPark Specific Plan would be located approximately 1,500 feet from this agricultural land. Because the nearest agricultural land will be buffered from the proposed residential and school uses by more than 1,500 feet, development of

¹⁴ Ventura County Agricultural Land Trust and Conservancy and the California State Coastal Conservancy: *The Value of Agriculture to Ventura County: An Economic Analysis*, March 1996.

the uses allowed by the proposed Specific Plan would not have significant impacts on the this agricultural land, including such impacts as blocking solar access to agricultural sites and land use incompatibility. Furthermore, the proposed Specific Plan consists of commercial and residential uses that would not generate a significant amount of dust or introduce agricultural pests and diseases. The RiverPark Project will also result in a net gain in local groundwater, as described in detail in **Section 4.5, Water Resources**. No impact on agricultural water supplies, therefore, will result.

CUMULATIVE IMPACTS

The Oxnard *2020 General Plan* contains a projection of the amount of agricultural land that will be converted to urban uses if all existing agricultural land designated for urban uses in the *General Plan* is developed. This projection includes the agricultural land in RiverPark Area 'A', which is designated for Regional Commercial use on the *2020 General Plan Land Use Map*. This projection reflects the CURB approved by the voters in 1998, which preserves over 19,449 acres of the 22,800 acres of agricultural land within the City's Planning Area. A total of 3,351 acres of agricultural land, including the prime agricultural land within the RiverPark Specific Plan Area, will be impacted if all land designated for urban uses in the *2020 General Plan* are developed. The proposed project will contribute to this significant cumulative loss of agricultural land.

MITIGATION MEASURES

There are no feasible measures to mitigate the direct loss of the agricultural land within the Specific Plan Area.

UNAVOIDABLE SIGNIFICANT IMPACTS

The loss of agricultural land within the RiverPark Specific Plan Area would be an unavoidable significant impact resulting from the Project. The portion of the Specific Plan Area containing the 155 acres of prime farmland has been designated for urban uses since 1986 and the RiverPark Project is consistent with the policies of the Oxnard *2020 General Plan* addressing the preservation of agricultural land.