

## 4.2 Agriculture and Forestry Resources

This section describes the existing agriculture and forestry conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. This section incorporates information from the Conservation and Open Space Element of the Irvine 2045 General Plan (City of Irvine 2024) and the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) (DOC 2020). No comments regarding agricultural resources were received during the NOP scoping period.

### 4.2.1 Existing Conditions

#### Regional Context

The City of Irvine (City) has a long history of agricultural use dating back to the acquisition of ranchlands in 1866 and intensification of agricultural production during World War I (City of Irvine 2025). These ranchlands were used for grazing of sheep and cattle. Furthermore, a variety of crops were grown on these ranchlands, such as wheat, barley, beans, grapes, walnuts, and oranges (Irvine Ranch Conservancy 2021). However, agricultural resources have experienced a decline since the 1950s due to escalating land costs, heightened housing demand, and competition from larger agricultural operations. The 1960s marked the commencement of residential expansion in the City through the development of several residential villages; the City was officially incorporated on December 28, 1971. As of 2023, the City contains approximately 3,996 acres of land designated for various agricultural uses (City of Irvine 2024). Agricultural and forestry resource characteristics specific to the project site are described in the following subsections.

#### Mapped Important Farmland

The FMMP identifies agricultural farmland categories for lands in the United States. These lands are categorized and identified using modern soil surveys developed by the U.S. Department of Agriculture through technical soil ratings and current land use (DOC 2025). These categories are used for reporting changes in land use as required for the FMMP's biennial farmland conversion report.

DOC defines FMMP agricultural farmland categories as follows (DOC 2025):

##### Prime Farmland

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

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.

### Farmland of Local Importance

Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. Farmland of local importance also contains land cultivated as dry cropland for grains and hay.

### Unique Farmland

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.

### Grazing

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, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

### Urban and Built-Up Land

Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

### Other Land

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

DOC identifies the majority of the project site as Prime Farmland through their FMMP (DOC 2020). The remainder of the project site is composed of Grazing Land, Other Land, Unique Farmland, and Urban and Built-Up Land. See Figure 4.2-1, Farmland Mapping and Monitoring Program (FMMP), and Table 4.2-1, which indicate the important farmland composition of the project site.

**Table 4.2-1. Project Site Important Farmland**

Important Farmland Category	Acreage	Percentage of Project Site
Prime Farmland	64.48	58.66%
Other Land	22.16	20.16%
Grazing Land	20.26	18.42%
Unique Farmland	2.98	2.71%

**Table 4.2-1. Project Site Important Farmland**

Important Farmland Category	Acreage	Percentage of Project Site
Urban and Built-Up Land	0.05	<0.05%
<b>Total<sup>a</sup></b>	<b>109.93<sup>b</sup></b>	<b>100%</b>

Source: DOC 2020.

**Notes:**

<sup>a</sup> Totals may not sum precisely due to rounding.

<sup>b</sup> This acreage does not equal the approximate 120 acres reported in Chapter 3, Project Description, because it includes only areas covering the project parcels and not adjacent roadways.

## Soils

The underlying materials at the project site consist of varying depths of undocumented fill overlying alluvial deposits. A preliminary geotechnical report (Appendix E-1 to this Draft EIR), further discussed in Section 4.7, Geology and Soils, identified intermittent deposits of undocumented artificial fills present on site that are related to past agriculture activities. Material was observed to be similar to alluvium, generally consisting of brown, clayey to silty sand and sandy silt. Alluvium is a deposit that is composed of sediments transported by water. The project site is generally underlain by Quaternary alluvial deposits. The alluvial deposits are described as Holocene to Late Pleistocene Epoch deposits predominantly consisting of brown, reddish-brown, and light yellowish-brown sandy silt to silty sand, clayey sand, and silty to sandy clay, slightly moist to moist and loose to medium dense.

## Crop Production

According to the Northern Sphere Area General Plan Amendment and Zone Change EIR (Northern Sphere Program EIR), the Northern Sphere Area has historically been cultivated for irrigated crop rows, primarily strawberries, tomatoes, celery, and beans (City of Irvine 2002a). This area has also been cultivated for orchard crops such as avocados and nursery stock.

## California Land Conservation Act of 1965 (Williamson Act) Lands

The Williamson Act provides tax incentives to retain prime agricultural land and open space in agricultural use, which slows its conversion to urban development. The overall purpose of the Williamson Act is to protect agricultural lands and open space. According to the Conservation and Open Space Element of the Irvine 2045 General Plan, since 1989 no agricultural land in the City has remained under the Williamson Act contract provisions outlined in Section 51230 of the California Government Code (City of Irvine 2024).

## Forests and Timberlands

Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (California Public Resources Code [PRC] Section 12220[g]). Timberland is defined as “land ... which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (PRC Section 4526). Certain parts of the City encompass forest land resources, including the Santiago Hill sand areas in the northern flatlands, central flatlands, and San Joaquin Hills; these areas fall under designations of Eucalyptus Windrow, Sand Canyon Oak Trees, and Natural Community Conservation Plan (NCCP) Habitat Reserve mapped in the Conservation and Open Space Element of the Irvine 2045 General Plan (City of Irvine 2024). The project site is not mapped within these areas and does not contain 10% tree cover.

## 4.2.2 Relevant Plans, Policies, and Ordinances

### Federal

#### Farmland Protection Policy Act (7 USC Section 4201)

The purpose of the Farmland Protection Policy Act (FPPA) is to minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses. It additionally directs federal programs to be compatible with state and local policies for the protection of farmland. Under the FPPA, the term “farmland” includes Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance. Farmland that is subject to FPPA requirements does not have to be currently used as cropland. It can be forest land, pastureland, or other land, but not urban and built-up land or water. FPPA ensures that, to the extent possible, federal programs are administered to be compatible with state, local government, and private programs and policies to protect farmland. In 1981, the U.S. Congress passed the Agriculture and Food Act (Public Law 97-98), which contained the FPPA (Subtitle I of Title XV, Sections 1539–1549). Federal agencies are required to develop and review their policies and procedures related to implementing the FPPA every 2 years. The FPPA does not authorize the federal government to regulate the use of private or nonfederal land or in any way affect the property rights of owners. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or rely on assistance from a federal agency (USDA 2025).

### State

#### Farmland Mapping and Monitoring Program

As mentioned in Section 4.2.1, Existing Conditions, the goal of the FMMP is to provide consistent and impartial data to decision makers for use in assessing current status, reviewing trends, and planning for the future of California’s agricultural land resources. The FMMP produces Important Farmland Maps, which are a hybrid of resource quality (soils) and land use information. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called “Prime Farmland.” The maps are updated every 2 years using a computer mapping system, aerial imagery, public review, and field reconnaissance. Data are also released in statistical formats—principally, the biennial California Farmland Conversion Report.

#### Williamson Act

The Williamson Act applies to specific parcels in the State of California. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. Private land within locally designated agricultural preserve areas is eligible for enrollment under a Williamson Act contract. The Williamson Act program is administered by DOC, in conjunction with local governments that administer the individual contract arrangements with landowners. Under the Williamson Act, a landowner commits the parcel to a 10-year period during which time no conversion from agricultural or open space use is permitted. In return, the land is taxed at a rate based on the actual use (i.e., agricultural production), as opposed to its unrestricted market value. Each year, the contract automatically renews unless a notice of nonrenewal or cancellation is filed.

### California Public Resources Code Section 21060.1

PRC Section 21060.1 uses the FMMP to define agricultural land for the purposes of assessing environmental impacts. The FMMP was established in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of such lands. The FMMP provides analysis pertaining to agricultural land use changes throughout California.

#### Local

##### General Plan Land Use and Zoning

The project site consists primarily of active agricultural fields, with equipment storage and laydown areas in the northern portion of the site. The current General Plan land use designation for the project site is Recreation, and the current zoning is 1.5 – Recreation. The project site's General Plan land use designation and zoning was changed from agriculture to recreation in 2002 as part of the Northern Sphere Area General Plan Amendment and Zone Change, which is described in greater detail in the following subsection.

##### Northern Sphere Area General Plan Amendment (48403-GA) and Zone Change (48405-ZC)

The City amended its General Plan and Zoning Code in 2002 to permit development of a mix of residential, industrial, commercial, recreational, and institutional uses and open space dedications in a portion of its then sphere of influence in preparation for annexation; this portion was referred to as the City's "Northern Sphere Area." This area consists of Planning Areas (PAs) 3, 6, and 9 and a portion of PAs 5 and 8. The project site is currently located within PA 6, Portola Springs, of the Northern Sphere Area. The development authorized by this General Plan Amendment and Zone Change reclassified PA 6 lands, including the project site, from agricultural to recreational.

The Northern Sphere Program EIR (State Clearinghouse No. 2001051010) is a Program EIR that evaluated the environmental effects of development of the PAs in accordance with the proposed changes in land use designations and zoning in the Northern Sphere Area. The Northern Sphere Program EIR addresses subsequent discretionary approvals within the Northern Sphere Area. The Northern Sphere Program EIR assessed the development of a maximum of 12,350 dwelling units, 575,000 square feet of Multi-use facilities, 175,000 square feet of Community Commercial facilities, 51 acres of Commercial Recreational uses, 6,556,000 square feet of Medical and Science facilities, 13 acres of Institutional facilities, 330 acres of Recreation, and a minimum of four elementary/middle schools. Notably, the Northern Sphere Program EIR also included approximately 3,867 acres of open space in PA 3 and PA 6. Consistent with these changes, Objective L-10 and associated policies of the General Plan were amended to reflect the deletion of areas designated for permanent agriculture while retaining provisions relating to the maintenance of agriculture as an interim use (City of Irvine 2002a).

The Northern Sphere Program EIR identified unavoidable adverse impacts related to agricultural resources due to the conversion of approximately 3,100 acres of Important Farmland. Specifically, the Northern Sphere Program EIR found that implementation of the General Plan Amendment and Zone Change would result in significant and unavoidable impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the FMMP; conflict with existing zoning for agricultural use; and changes to the existing environment that would result in the conversion of farmland to non-agricultural use. The Northern Sphere Program EIR determined these impacts to be significant and unmitigable because no feasible mitigation measures were available at the time to reduce impacts to a less-than-significant level. A Statement of Overriding Considerations was prepared and adopted by the City in May 2002 that concluded that the benefits of the General Plan Amendment and Zone Change outweighed its significant and unavoidable environmental impacts (City of Irvine 2002b).

### City of Irvine Agricultural Legacy Program and the 2002 General Plan Objective L-10

As a result of a Northern Sphere Program EIR mitigation measure, the City established an Agricultural Legacy Program. The City's Agricultural Legacy Program acknowledges that large-scale agricultural production is no longer viable in the City of Irvine given the City's other policies regarding its vision for development. The Agricultural Legacy Program is designed to recognize and address agricultural impacts on a City-wide basis as part of the City's implementation of 2002 General Plan Objective L-10, as amended, in conjunction with the approval of the Northern Sphere Area Project. The City's 2002 General Plan includes as a stated objective for the protection and preservation of agriculture in undeveloped areas until the areas are ready for development, or if the areas are not available for development (Objective L-10), recognizing that permanent retention of existing agricultural land throughout the City would conflict with the General Plan's goals of providing sufficient housing to meet the City's identified housing needs, retaining areas in the City for biological habitat and open spaces, and achieving fiscal balance as the community builds out. The following amended objective (City of Irvine 2005) applies to the proposed project:

**Objective L-10: Agriculture:** Encourage the maintenance of agriculture in undeveloped areas of the City until the time of development, and in areas not available for development.

**Policy (a):** Provide for farming opportunities in the community, where feasible and appropriate, through an Agricultural Legacy Program facilitating limited scale agricultural operations and programs on public lands. The program may include components such as edible landscape, metro-farming, heritage farming, model farming, education and community service farming and other farm market programs. Locations for implementation of the Agricultural Legacy Program to be considered should, at a minimum include:

- Designated open space spine network
- Designated open space areas not subject to the Natural Community Conservation Plan
- Other appropriate publicly owned lands

**Policy (b):** Consider creating a "working model" farm to act as a center for education and enjoyment of all age groups pursuant to the Agricultural Legacy Program, in conjunction with the City's planning efforts concerning the reuse of MCAS El Toro with the South Coast Research Extension owned by UC Regents.

**Policy (c):** Permit agricultural use of land that is unsuitable for building because it is within flood plains, or is subject to hazards to public health, safety, and welfare or similar constraints precluding development. Conversion from agricultural use may be allowed where the identified hazard conditions have been eliminated.

**Policy (d):** Permit agricultural uses, on an interim basis, on land designated for development, and consider agricultural uses as part to the City planning efforts for the re-use of MCAS El Toro.

**Policy (e):** Encourage and support federal and state legislation proposed for the purpose of preservation of agricultural lands that are compatible with the City's goals and objectives.

**Policy (f):** Allow for conversion of interim and permanent agricultural uses to development to provide land for the construction of housing unit consistent with the Land Use and Housing Elements, and the development of commercial and industrial buildings consistent with the provision of job opportunities as described in the Land Use Element, where such conversion does not conflict with other L-10 policies.

**Policy (g):** Pursue the open space policies contained in the Conservation and Open Space Element and address any open space or aesthetic impacts from the conversion of interim and permanent agricultural uses to development as part of the City's existing policies for preservation of open space and existing policies for mitigation of views and aesthetic impacts under the policies in the Conservation and Open Space Element.

In accordance with the establishment of the Agricultural Legacy Program, the landowner in the Northern Sphere Area (The Irvine Company) was required to contribute, and has since paid, \$100,000 to the City for further expanding metro-farming and heritage community service/education farming opportunities. Metro-farming generally includes small-scale agricultural operations and activities that can be accommodated in an urban environment. Such activities include, but are not limited to, small-scale specialty farming, model farming, heritage farming, and community service/educational farming.

The purpose of the Agricultural Legacy Program is to facilitate limited-scale agricultural operations and programs on public lands in the City. As part of the Agricultural Legacy Program, specific sites in the City would be identified and made available for metro-farming within 5 years.

Several conceptual sites were considered relative to being potentially viable for agricultural operations, including Site 6, a 64-acre parcel located in the City's northern sphere of influence generally southeast of the transition between the Eastern Transportation Corridor and the Foothill Transportation Corridor (City of Irvine 2005). The project site includes this parcel (Site 6).

### Irvine 2045 General Plan

The Conservation and Open Space Element of the Irvine 2045 General Plan provides the following goal, objective, and policies relevant to the proposed project and agriculture and forestry resources (City of Irvine 2024):

**Goal 7.** Encourage the maintenance of agriculture in undeveloped areas of the City until the time of development, and in areas not available for development.

**Objective COS-7:** To promote the preservation and sustenance of agricultural activities in undeveloped areas of the City until their eventual development, and in areas where development is not feasible or permitted, ensuring the continued vitality of agricultural landscapes and practices within the community.

**Policy (e):** Encourage and support federal and state legislation proposed for the purpose of preservation of agricultural lands which are compatible with the City's goals and objectives.

**Policy (f):** Allow for conversion of interim and permanent agricultural uses to development to provide land for the construction of housing units consistent with the Land Use and Housing Elements, and the development of commercial and industrial buildings with the provision of job opportunities as described in the Land Use Element, where such conversion does not conflict with other LU-10 policies.



### 4.2.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to agriculture and forestry resources are based on Appendix G of the CEQA Guidelines. According to Appendix G, a significant impact related to agriculture and forestry resources would occur if the project 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 of the California Resources Agency, to non-agricultural use.
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract.
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)).
4. Result in the loss of forest land or conversion of forest land to non-forest use.
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.

### 4.2.4 Impacts Analysis

1. ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

**Significant and Unavoidable Impact.** The project site includes 64.48 acres of Prime Farmland and 2.98 acres of Unique Farmland, as described in Section 4.2.1. Thus, the total Important Farmland on the project site is 67.46 acres, as shown on Figure 4.2-1. The balance of the site consists of Grazing Land, Other Land, and a small portion of Urban and Built-Up (developed) Land. Under the proposed project, the proposed site, including 67.46 acres of Important Farmland, would be converted to an urban, non-agricultural, residential use that would include parks, paseos, and an extension of the Jeffrey Open Space Trail. The proposed conversion of mapped Important Farmland to a non-agricultural use would be a significant impact.

Conversion of Important Farmland within the project site has been considered and found significant in a previous EIR. As described in Section 4.2.1, the project site is within PA 6, Portola Springs, which in 2002 underwent a General Plan land use and zoning change from agriculture to recreational as part of the Northern Sphere Area General Plan Amendment and Zone Change. The Northern Sphere Program EIR analyzed the impacts of converting agricultural lands and found that implementation of the Northern Sphere Area General Plan Amendment and Zone Change would result in significant and unavoidable impacts related to the conversion of Important Farmland (City of Irvine 2002a). Following the approval of the 2002 land use and zoning change, agricultural activities have continued at the project site. Note that interim agricultural activities are consistent with Objective L-10, Policy (i) of the General Plan Conservation and Open Space Element (City of Irvine 2002a). This policy anticipates the eventual development of agricultural lands in the project area and allows for interim agricultural uses prior to permanent conversion of agricultural lands to urban uses.



As previously discussed, the Northern Sphere Program EIR resulted in the establishment of the Agricultural Legacy Program. The program is designed to recognize and address agricultural impacts on a City-wide basis in conjunction with the approval of the Northern Sphere Area Project. The purpose of the program is to facilitate limited scale agricultural operations and programs on public lands with the City. As part of the Agricultural Legacy Program, several sites in the City were identified for possible metro-farming. Site 6, a 64-acre parcel southeast of the transition between the Eastern Transportation Corridor and the Foothill Transportation Corridor, comprises the residential development area of the project site (City of Irvine 2005). Therefore, implementation of the proposed project would preclude the utilization of Site 6 for future metro-farming and pose a potential conflict with the Agricultural Legacy Program, which is intended to reduce, but not fully mitigate, agricultural impacts analyzed in the 2002 Northern Sphere Program EIR.

The conversion of 67.46 acres from agricultural to non-agricultural uses resulting from the proposed project would represent a significant impact.

Mitigation measures, such as the implementation of the City's Agricultural Legacy Program, contemplated in the Northern Sphere Program EIR aimed at reducing or avoiding impacts related to the proposed project's loss of mapped Important Farmlands would not reduce agricultural impacts to a less-than-significant level, because agricultural conversion has been occurring in the project vicinity since 2002. As discussed in the Northern Sphere Program EIR, mitigation measures involving the retention of agricultural land as well as the purchase or transfer of development rights to preserve agricultural land would be infeasible for the proposed project due to economic factors, such as escalating land costs, affecting general agricultural viability in the City and region. Furthermore, as described above, implementation of the proposed project would pose a conflict with the Agricultural Legacy Program, which is intended to reduce and partially mitigate agricultural impacts specific to the project site, as analyzed in the 2002 Northern Sphere EIR. Therefore, there are no feasible mitigation measures that would reduce or avoid the loss of 67.46 acres of mapped Important Farmland caused by the development of the proposed project; the impact would be significant and unavoidable, as previously analyzed in the Northern Sphere Program EIR.

**2. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

**No Impact.** The project site is zoned 1.5 – Recreation within the City's PA 6, Portola Springs, and is not subject to a Williamson Act contract. The project site is surrounded by lands that are not zoned for agriculture; specifically, 1.4 – Preservation to the north and east, 2.3 – Medium Density Residential to the south, and 2.2D – Low Density Residential to the west. The proposed project would not change the boundaries of the City's agricultural zoning districts or the total land acreages of those districts. The proposed project would not lead to cancellation of or conflict with Williamson Act contracts, because none exist within the City, according to the Conservation and Open Space Element of the Irvine 2045 General Plan (City of Irvine 2024). For these reasons, the proposed project would not conflict with zoning for agricultural use or Williamson Act contracts, and no impact would occur.

**3. *Would the project 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))?***

**No Impact.** As described in Section 4.2.1, according to PRC Section 12220(g), forest land consists of 10% native tree cover that allows for management of forest resources. The project site is not covered by 10% native trees. The project site contains trees mostly concentrated along its eastern and western boundaries,

along Bee Canyon Access Road and Jeffrey Road, respectively. These trees, which primarily consist of non-native eucalyptus and myoporum trees, do not constitute forest land pursuant to PRC Section 12220. There is no land designated as forest land within or adjacent to the project site. Further, there are no zoning classifications for forest land, timberland, or timberland protection zones, as defined by PRC Section 4526 or California Government Code Section 51104(g), within the City (City of Irvine 2024). For these reasons, the project site does not contain forest land, timberland, or land zoned for timberland production. Therefore, the proposed project would not conflict with existing zoning or cause rezoning of these types of land. No impact would occur.

**4. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

**No Impact.** The project site consists of approximately 120 acres of relatively flat land that does not contain forest resources. As discussed in Section 4.2.4(3), there is no land designated as forest land within or adjacent to the project site. The Conservation and Open Space Element of the Irvine 2045 General Plan identifies certain parts of the City with the potential to support forest land resources, such as the Santiago Hill sand areas in the northern flatlands, central flatlands, and San Joaquin Hills; these areas fall under designations of Eucalyptus Windrow, Sand Canyon Oak Trees, and Natural Community Conservation Plan (NCCP) Habitat Reserve (City of Irvine 2024). However, the project site is not located within these mapped areas. For these reasons, the project site does not contain forest land. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to a non-forest use. No impact would occur.

**5. *Would the project 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?***

**Less-Than-Significant Impact.** Agricultural operations may become constrained due to concerns with the effects of dust, odor, noise, and pesticide use from residential uses. In addition, urban effects such as vandalism, garbage, and predation by domestic pets (cats and dogs) can impact agricultural uses. These are often identified as “edge effects,” as the urban edge interacts with agricultural uses. Development of the proposed project and associated conversion of farmland to residential use at the project site would have the potential to impact nearby agricultural operations. The project site is surrounded by residential development to the west and south; undeveloped open space to the east; and the Irvine Ranch Conservancy Native Seed Farm (Seed Farm) and various other special use sites leased to third parties, including a landscape designer, a pump supplier, and an excavating contractor, to the north. The interaction between the proposed project and the Seed Farm, which contains Important Farmland mapped by the FMMP, could result in edge effects, as discussed below.

The Seed Farm does not involve a traditional agricultural use. Seed Farm operations include growing and tending to seed-producing plants. The intent of the Seed Farm is to conserve a natural seed bank for the area, with the goal of restoring sensitive habitats. The Seed Farm supplies seeds to a variety of local agencies, such as OC Waste & Recycling, the Orange County Transportation Authority, OC Parks, and the City of Irvine, for the implementation of their projects; it also supports internship and volunteer programs, as well as community service projects (Irvine Ranch Conservancy 2025). The Seed Farm is mission-driven and equipped with agency partnerships, and large-scale use of harvesting equipment and pesticides does not occur at the Seed Farm; thus, the Seed Farm is not a traditional agriculture use. Operations at the Seed Farm are multi-faceted and the Seed Farm is expected to withstand the potential edge effects described

above more robustly than traditional agriculture. For the reasons described above, the Seed Farm, as compared to traditional agriculture, is also not as susceptible to incompatibility issues with neighboring land uses. Furthermore, a goal of the proposed project is to provide access to the adjacent open space lands for residents of the City, creating a “gateway.” The project includes the construction of the approximately 4.9-acre South Park at the northern portion of the project site, which would provide recreational areas as well as access to adjacent open space lands via a new trailhead. The location of this new park would create a planned buffer between the project’s proposed residential development to the south and the Seed Farm to the northeast, thereby further protecting the Seed Farm’s seed bank from potential edge effects.

Although the project proposes some residential development along its northern boundary, adjacent to the proposed South Park and the Seed Farm, this does not represent significant encroachment. The residential development proposed in the northern portion of the project site is constrained by the proposed South Park to the north and Bee Canyon Road and proposed fuel management easement to the east. Therefore, the proposed residential development would share an approximately 300-foot-long border with the Seed Farm. Because of the Seed Farm’s non-traditional agricultural uses and the proposed buffer created by South Park, the proposed project’s edge effects would not jeopardize the Seed Farm’s ongoing operations. Therefore, the proposed project would not involve other changes to the existing environment that would result in the conversion of farmland, and impacts would be less than significant.

### Impact Summary

The conversion of mapped Important Farmland to a non-agricultural use caused by the development of the proposed project, resulting in the loss of 67.46 acres of mapped Important Farmland, would be a significant and unavoidable impact. All other agriculture and forestry impacts related to the proposed project would be less than significant or would not occur.

## 4.2.5 Mitigation Measures

The Northern Sphere Program EIR reviewed potential mitigation measures for the purposes of mitigating or avoiding the impact of converting Important Farmland. These measures included possible retention of agricultural land on site as well as the purchase or transfer of development rights, via agricultural impact fees, to preserve agricultural land elsewhere in the City or region. However, these mitigation measures would not reduce agricultural impacts to a less-than-significant level due to the generally questionable viability of agricultural production in the project area. The Northern Sphere Program EIR states that long-term viability of large-scale operations continuing on agricultural lands in the area is questionable due to factors affecting the economies of long-term, large-scale agricultural operations in Orange County. In the context of this discussion, although the conversion of Important Farmland at the project site would be significant, the landowner’s and City’s ability to sustain economically viable agricultural uses in the project area through mitigation is still doubtful.

Pursuant to this discussion, and as discussed in Section 4.2.4, Impacts Analysis, no feasible mitigation measures have been identified to avoid or substantially reduce the significant impact relating to conversion of Important Farmland to a non-agricultural use.

No significant impacts were identified in the analysis of the other potential agricultural effects; therefore, no mitigation measures are required.

### 4.2.6 Level of Significance After Mitigation

Impacts relating to the conversion of Important Farmland would remain significant and unavoidable. All other impacts would remain less than significant or would not occur.

### 4.2.7 Cumulative Impacts

Other past, present, and reasonably foreseeable projects would result in the conversion of Important Farmland to non-agricultural uses. As discussed in Section 4.2.2, Relevant Plans, Policies, and Ordinances, under “Local,” the Northern Sphere Program EIR identifies the conversion of approximately 3,100 acres of Important Farmland in the City as a significant and unavoidable impact. Implementation of the proposed project would convert approximately 67.46 acres of Important Farmland at full buildout. As recognized in the Northern Sphere Program EIR, the encroachment of urban areas on agricultural lands has been a continuing trend in the Orange County region due to rising costs of irrigation water, increased land value, and labor costs (City of Irvine 2002a). Since the issuance of the 2002 Northern Sphere Program EIR, lands to the west and south of the project site have been developed from agricultural uses to residential uses. Therefore, the project site is now surrounded by lands converted from agriculture to urban uses, as contemplated in the Northern Sphere Program EIR. The transition of agricultural lands at the project site and in the area surrounding the project site aligns with the conclusions reported related to agricultural viability as well as the development scenario anticipated by the Northern Sphere Program EIR.

The loss of approximately 67.46 acres of Important Farmland represents a significant cumulative impact to which the proposed project would contribute. Therefore, the project’s conversion of Important Farmland can be considered both direct and cumulative. As described in Section 4.2.4(1), there are no feasible mitigation measures to address either direct conversion or cumulative loss of Important Farmland associated with the project. Therefore, the cumulative impact of farmland conversion would be significant and unavoidable.

The project site does not contain land currently under a Williamson Act contract; therefore, it would not contribute to a cumulative impact to contracted lands. Further, the project site does not contain forest land (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by California Government Code Section 51104[g]). Therefore, the proposed project would not contribute to a cumulative impact to forest land or timberland. As discussed in Section 4.2.4(5), the project would not result in other changes to the existing environment, such as edge effects, that 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. This potential impact is specific to the project site and immediately adjacent parcels; therefore, the impact would not be cumulatively considerable.

### 4.2.8 References

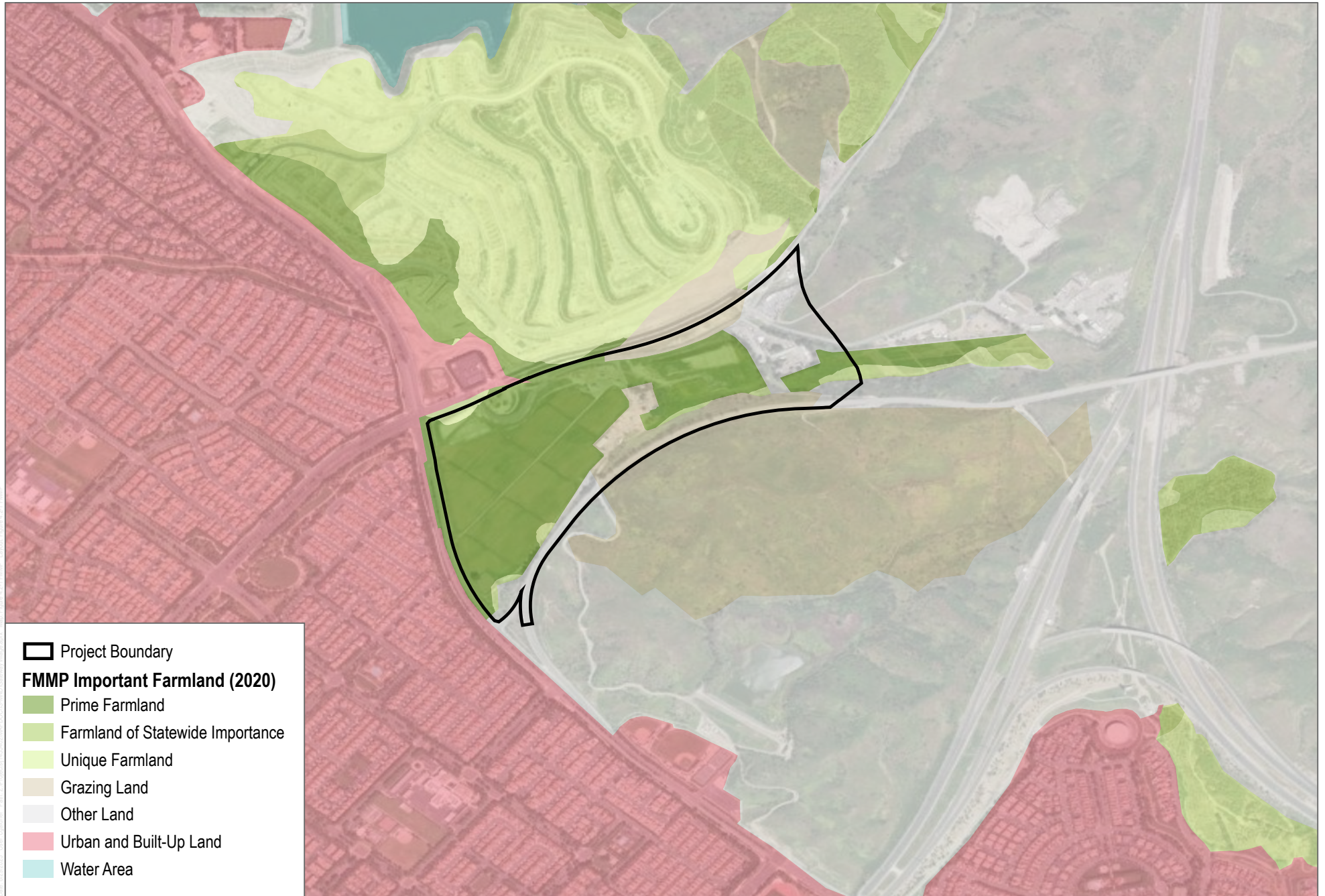
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SOURCE: Bing Maps (Accessed: 2025); CA Department of Conservation FMMP (2020)

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