

Housing Issues
in the
Westside South Market Area

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Development Services Division
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I. Statement of Purpose of the Study

This study has been prepared in response to the June 10, 2003, request of the Board of Supervisors for staff to study the housing issues in the Westside South Market Area (WSMA) in light of information and concerns provided by the Westside Housing and Economic Network (WHEN).

WHEN is developing a proposal to provide housing southwest of Five Points in the Westside South Market Area and wanted consideration and recognition of the housing needs in the area which they felt were not adequately addressed in the Housing Element. Under the WHEN proposal housing of various types would be developed in a community/subdivision setting with related structures for commercial, medical and religious uses. (WHEN has submitted a pre-application for a General Plan Amendment that was processed separately from this study although there are common and related issues.) WHEN is also looking at means to preserve existing farmworker housing units in the area.

This study:

- addresses the provisions of the Housing Element relative to the WSMA;
- reviews General Plan Policy related to housing, development and services in the WSMA;
- considers issues for provision of services in the area,
- relates the proposal to the Westside Land Retirement Program; and
- addresses other issues related to the housing in the area.

This study does not:

- address the General Plan Amendment (GPA) required for the WHEN Five Points project; the GPA is addressed in a separate process culminating in public hearings before the Planning Commission and Board of Supervisors.

The study has been prepared to assist the Board of Supervisors in the evaluation of the issue of housing in the Westside South Market Area in light of General Plan Policy, to determine if there is need to redefine or expand upon the policies of the General Plan, and to give further direction to staff, as deemed appropriate.

II. Provisions of the Housing Element for Housing in the Westside South Market Area

Creation of the WSMA

The Westside South Market Area was defined in the 2001 Fresno County Regional Housing Needs Allocation Plan approved by the Council of Fresno County Governments. It is one of the five market areas defined for Fresno County: Westside North, Westside South, East Valley, the Fresno-Clovis Metropolitan Area (FCMA), and Sierra Nevada.

The housing market areas were intended to represent sub-regions in which there is an interaction between employment opportunities and housing opportunities. The creation of the five market areas in 2001 also considered the then current economic relationships such as the Five-Cities Economic Development Authority and the I-5 Business Development corridor. An alternative to the five market areas wherein the Westside North and the Westside South would be merged was also considered in the early preparation stages of the Regional Housing Needs Allocation Plan. The separation was retained because of the different housing and employment markets that exist, primarily for the incorporated cities. Coalinga and Huron do not tend to interface with Kerman, Mendota, Firebaugh, and San Joaquin, largely due to the distances between them.

The market area boundaries follow census tracts. The WSMA encompasses the area generally located south of Cantua Creek and Mt. Whitney Avenue and west of the Fresno-Kings County line, southwest of the town of Lanare. Refer to Appendix A for the map of the five market areas. The cities of Coalinga and Huron are located within the WSMA. There are no unincorporated communities in this market area. The Housing Needs Allocation Plan describes the valley portion of the area as largely agriculture while the Coast Range portion is used for cattle grazing, mining, recreation and wildlife habitat.

The market area, as described in the Housing Element, is sparsely populated with 26,352 persons in four census tracts, according to the 2000 Census. The vast majority resides within the two cities or Pleasant Valley State Prison. The prison is a discontinuous part of the City of Coalinga and has an inmate population of over 4,500. The rest of Coalinga is home to over 11,600 persons, who live in a larger proportion of owner-occupied housing units (2,024 households) than rented units (1,491 households). Huron's population is over 6,300, with many more renters (923 households) than homeowners (455 households).

There is also a big discrepancy between the cities in average household size. In Coalinga, the average is 3.11 persons for owner-occupied units, 3.07 persons for renter-occupied housing. In Huron, the averages are 4.73 and 4.32 persons, respectively.

Fewer than 4,000 persons reside in the unincorporated part of the WSMA, and there is also a preponderance of renters among their households. Only 270 of their housing units are owner-occupied, while 595 are rented. Average household sizes are unavailable.

Housing Needs Allocation for the Market Area

The Regional Housing Needs Allocation Plan has defined housing needs in each of the five market areas in Fresno County. Table 1, excerpted from the County's Housing Element Table H-1, summarizes the housing needs allocations by market area for unincorporated areas of the County.

Income Level	Westside North	Westside South	Fresno-Clovis	East Valley	Sierra Nevada	TOTAL
Very Low	370	102	381	218	70	1,141
Low	223	0	211	118	58	610
Moderate	242	20	215	125	77	679
Above Moderate	159	75	(-46)	(-15)	149	322
AREA TOTAL	994	197	761	446	354	2,752

Source: 2001 Regional Housing Needs Allocation Plan, Table 19

The negative entries in the Above Moderate Income row for the East Valley and Fresno-Clovis Metropolitan Area Market Areas are statistical anomalies reflecting a "surplus" of that category of housing units.

The allocation for all of the Westside South Market Area, including the cities of Coalinga and Huron is shown in Table 2. These allocations are the Regional Housing Needs Allocation Plan's estimated housing construction need by jurisdiction and income group based on the projected number of new households, a factor for market removal rate of 0.9% and a vacancy rate factor of 6.6%. The total year 2007 needs allocation in the unincorporated area of the WSMA is 197 housing units.

	Very Low	Low	Moderate	Above Moderate	Total
Coalinga	74	68	68	46	256
Huron	68	62	76	107	313
Unincorp.	102	0	20	75	197
WSMA total	244	130	164	228	766

Source: 2001 Regional Housing Needs Allocation Plan, Table 19

Inventory of Residential Land Resources and Available Housing Sites

The inventory of unincorporated, residentially zoned lands prepared for the County Housing Element showed that there are no residentially zoned parcels in the unincorporated area of the WSMA. Therefore the Housing Element shows no potential units in the area and an overall deficit of 197 units. The Element does recognize that housing units may be built in the Agricultural Zones either as single family units or as farmworker housing. Building permit activity from 2000 and 2001 showed six new units in this unincorporated area of the County. The calculation of new units in 2002 will be done in conjunction with the next annual report.

In the past the County had shifted allocations within the unincorporated market areas to avoid a deficit. In the 2002 Housing Element the County chose not to shift the allocations among market areas but rather to use the adopted spread of units to

focus on areas in which to further address housing needs. The intent, as stated on page 7-57 of the Housing Element, was to prioritize the update of community and regional plans to address the deficits in the market areas wherever possible recognizing the need to balance the housing demand with job and service availability as well as other services essential to residential development and with the major directive of the County General Plan to preserve agricultural lands and direct growth to the cities. Absent residential zoning and unincorporated communities in the WSMA, page 7-58 of the Housing Element suggests that the housing needs of this area would be met in the cities of Huron and Coalinga, in the cities and unincorporated areas of the Westside North Market Area, and on agriculturally zoned parcels where single family residences and farm labor camps can be constructed. The Housing Element does not suggest deviation from the adopted General Plan but also determined to retain the housing needs figures so they could be tracked and considered in the next Regional Housing Needs Allocation Plan.

Corrections to Housing Element for CSA 49 Location and for Allocation Locations

The preparation of this study included a review of the Housing Element to determine if there were errors in the element pertaining to the WSMA. The WHEN representatives had presented information that suggested that there may be some items that would need to be corrected. The review showed four pages could be corrected. These corrections, described below, would appropriately be presented with the next Annual Report on the General Plan

The last sentence of the WSMA summary on page 7-58 of the Housing Element should be corrected to recognize that CSA 49 is located in this area and Table H-27 on page 7-56 should likewise be corrected to reflect the location of CSA 49 in the WSMA.

The Housing Element contains two references to shifting of residential units among the various market areas to eliminate deficits. One of these references had been a concern to WHEN because the representatives want to keep the allocation within the WSMA. It is appropriate to provide some background on the proposed shifting of units, the changes that occurred in the public hearing process on the draft Housing Element in Spring of 2000 and the oversight on two remaining references to shifting.

The initial draft of the Housing Element from March of 2002 had utilized a different base for the inventory of residential parcels including vacant land and underdeveloped parcels within service areas. The analysis of the potential housing units that could be developed in each of the market areas was then the base for recommending the shifting of the allocations within the various market areas to avoid deficits in some areas such as the WSMA. Because of concerns raised by neighborhood groups and questions from the State Department of Housing and Community Development (HCD) regarding the use of underdeveloped parcels in the inventory it was determined that a second inventory would be done to identify all vacant residentially zoned parcels. This inventory showed a greater number of potential residential units, sufficient to meet the countywide allocation for the unincorporated area. Since there was a sufficient supply of vacant residentially zoned parcels to meet the allocation it was determined that the County would not

immediately rely on a shift of allocated units but rather would look to the updates of the community and regional plans to consider means to better address the allocations within the context of the overall goals of the County General Plan.

The Summary of the Inventory of Residential Land Resources on page 7-57 of the Housing Element reflects the position of the County not to propose the shifting of units among the market areas. Two other references to shifting based on the first draft of the Housing Element were overlooked when the changes were made to the draft Housing Element. These are on page 7-9 and page 7-75. The first reference to shifts provides the basis and reason for shifts of allocations in county housing elements. This section should be adjusted to remove the reference to shifts in allocations. The second reference to shifting is in the fourth paragraph under the heading Consistency with Other General Plan Elements (page 7-75). The text of this section will need to be updated to accurately reflect the intent of the Element.

In conclusion the WSMA has an allocation of 197 units spread among the four income groups and there is a deficit of vacant residentially zoned land in the market area to meet the allocation because there is no residentially zoned land in the unincorporated area of this market area. The allocation can not be readily met in the WSMA because it is not anticipated that sufficient new housing will be built on the area farms, particularly in light of the Westlands land retirement and the current trend for farmers to close their labor camps versus create new farm labor housing on their farms. Therefore the County must anticipate the need for additional units in the adjacent Westside North Market Area where sites are or can be designated consistent with the General Plan.

It should be noted that the allocation of housing units is directed to market areas but can be met on a countywide basis. Therefore the deficit in the WSMA has been recognized but has not been modified through shifting of units so the situation will not be overlooked in the next housing needs allocation plan.

III. General Plan Policy for Development in the Westside South Market Area

In considering the need for housing in the WSMA it is important to have an overall perspective of the land use directives of the General Plan so that the issues can be assessed within that full context of the General Plan. The following sections provide an overview of the General Plan land use and service directives and policies.

General Plan Vision

As stated in the Vision Statement of the County General Plan, in page 8 of the General Plan, "The County sees its primary role to be the protector of prime agricultural lands, open space, recreational opportunities, and environmental quality, and the coordinator of countywide efforts to promote economic development." The General Plan is built on eleven major themes, which are enclosed as Appendix B. While each of the themes has some significance in this study the particularly important themes for this study are "Agricultural Land Protection", "Urban-Centered Growth", and "Efficient and Functional Land Use Patterns". The Economic Development theme can not be overlooked, particularly in relation to the agricultural land retirement program that is occurring on the west side of the County.

Agricultural Preservation Policy

The first policy of the Agriculture and Land Use Element establishes the County position for new urban development in agriculturally designated areas. The policy directs growth specifically to areas of existing development with public facilities and infrastructure available. This policy is focused on both the preservation of agricultural land and the directing of growth to cities and unincorporated communities.

Policy LU-A.1 The County shall maintain agriculturally-designated areas for agriculture use and shall direct urban growth away from valuable agricultural lands to cities, unincorporated communities, and other areas planned for such development where public facilities and infrastructure are available.

The policy protects agricultural lands from conversion and potential incompatible uses. This policy can also protect residents from some of the nuisances associated with agriculture such as dust, early and late hours of farm equipment operation, and pesticides.

While the retirement of agricultural lands suggests that the soils on 200,000 acres on the westside are no longer productive, a considerable amount of productive agricultural acreage remains on the Westside. Further, other policies still direct growth to the cities and unincorporated communities where services have been established in support of urban land uses. These are the County's basic "smart growth" policies.

Land Use Policy Directing Growth to Cities and Unincorporated Communities

Once the direction in Policy LU-A.1 is recognized in terms of where urban development may occur in the County then other policies which provide details for the development can be considered. These policies define the types of development that is to be considered, based on the principals of the *Landscape of Choice*.

It is appropriate to note that the General Plan contains specific policy related to urban centered growth and specifically eliminates the further use of land use designations that had previously allowed new communities and rural residential development. The only General Plan provision for a new urban development area is within the long-term provisions for the Friant-Millerton Regional Plan area in Policy LU-H.8. The General Plan does not look to establishing new communities, particularly in agricultural areas. This is in part due to the recognition that services are available in existing urban areas including both public and private services and the related infrastructure and transportation networks. The General Plan seeks to maximize the efficiency of existing facilities and avoid duplication of services.

Public Facilities and Services Element Policy

The introduction to the Public Facilities and Services Element recognizes a limited role for the County in the provision of public services: "Since the major themes of the General Plan include directing urban growth to existing communities, limiting the intrusion of development onto productive agricultural land, and limiting the spread of rural residential development, demand for public facilities and services will be controlled."

- Policy PF-A.1 The County shall ensure through the development review process that public facilities and services will be developed, operational, and available to serve new development. The County shall not approve new development where existing facilities are inadequate unless the applicant can demonstrate that all necessary public facilities will be installed or adequately financed and maintained (through fees or other means).
- Policy PF-B.1 The County shall require that new development pays its fair share of the cost of developing new facilities and services and upgrading existing public facilities and services; exceptions may be made when new development generates significant public benefits (e.g., low income housing) and when alternative sources of funding can be identified to offset foregone revenues.
- Policy PF-C.19 The County shall discourage the proliferation of small community water systems.
- Policy PF-D.2 The County shall require that any new community sewer and wastewater treatment facilities serving residential subdivisions be owned and maintained by a County Service Area or other public entity approved by the County.

Open Space and Conservation Element Policy

Policy OS-A.28 The County shall only approve new wastewater treatment facilities that will not result in degradation of surface water or groundwater. The County shall generally require treatment to tertiary or higher levels.

Air Quality policy is contained in the Agriculture and Land Use Element, Transportation and Circulation Element and the Open Space and Conservation Element. The introductory comments on air quality in Section G of the Open Space and Conservation Element include the following:

The linkages between land use patterns, transportation systems, and air quality are the primary means for local governments to address air quality issues. The main method of local control over air quality in Fresno County is the reduction of the number of vehicular miles traveled (VMT) and resulting vehicular emissions. . . .The primary role for Fresno County in this strategy is to direct development to population centers; to encourage jobs-housing balance; to avoid proliferation of scattered low-density residential development projects; and to minimize further parcelization and designation of land for rural-residential development.

The land use related air quality policies address four objectives:

- a. To keep growth in existing development areas;
- b. To encourage compact development;
- c. To encourage mixed-use development; and
- d. To encourage pedestrian and transit-oriented development in urban areas.

With the retirement of agricultural land on the westside and the mechanization and computerization of remaining farming operations, the focus of farm work will likely change and farmworkers may look to other jobs and professions. Therefore it is appropriate to continue to direct housing to urban areas where jobs are located, with the additional benefit on air quality.

Housing Element Policy

The Housing Element contains numerous policies that address affordable housing in the County and related services. The Element also directs where that housing is to be located. That direction is found in the following Housing Element policies:

Policy H-B.3 The County shall direct new housing development to communities where essential public services are provided and where adequate employment, commercial, community and education services are available.

Policy H-D.1 The County shall support residential development in existing communities supported by nearby employment opportunities.

Policy H-D.2 The County shall encourage production of housing in close proximity to public transportation and services.

- Policy H-D.3 The County shall promote mixed-use development where housing is located adjacent to jobs, services, shopping, schools, and public transportation.
- Policy H-D.5 The County shall advocate and support the development of a range of housing for all income levels in proximity to existing and planned employment centers in an effort to achieve a jobs/housing balance.
- Program H-D.A The County shall evaluate new job-generating projects (commercial and industrial) to assure that the location is in reasonable proximity to housing to minimize commute distances and associated effects on household cost for commuting, air quality and circulation/transportation system needs.
- Program H-D.B The County shall evaluate proposals for designation of land for residential development to assure that there are adequate job opportunities in close proximity or adequate public transit access to minimize commute distances and associated effects on household cost for commuting, air quality and circulation/transportation system needs.

Comment on WHEN's List of General Plan Policies That Support the Use

WHEN has cited a number of policies in the County General Plan that its proposed project will support based on the planned design and composition of the project. However, the key issue that needs to be addressed is the development of agricultural land, that is, land planned for agricultural use in the general plan and the appropriateness of a new urban development project on agriculturally designated lands when considered in light of county policy which directs growth to the cities and unincorporated communities. The unincorporated communities are those listed in the General Plan and do not include agricultural centers such as Five Points nor new urban development outside of the designated areas in the General Plan.

County policy is tiered in the respect that the basic land use designation and policy must first be met. Once it can be found that a land use will be consistent with the General Plan then policies that address themselves to infrastructure and to greater details of development can be considered. In the Westside South Market Area the major portion of the area is designated either Agriculture or Westside Rangeland on the County General Plan and the Coalinga Regional Plan. The Cities of Huron and Coalinga comprise the major areas with other land use designations under the respective community plans. The 2000 Update of the General Plan reemphasized the significance of preserving agricultural lands, directing of growth to the cities and pursuing economic development.

IV. Services for New Development

Typical Services Available to Residents of Cities and Unincorporated Communities

The General Plan directs growth to cities and unincorporated communities where urban services can be provided to residents. The services found in cities include typical public services and facilities such as water, sewage disposal, storm drainage, roads, transportation (public transit), sheriff/police protection, fire protection, libraries, schools, parks and recreation services, and social service offices; quasi-public facilities such as churches and hospitals; and private services and facilities such as food stores, pharmacies, laundromats, dry cleaners, service stations, clothing stores, medical offices and clinics, etc. Many of the basic services are also available in the unincorporated communities. In the unincorporated communities the water, sewer, storm drainage, lighting, and other services may be provided by a County Service Area (CSA) or other special district such as a community service district or a public utility district.

Provisions of CSA 49 Formation Southwest of Five Points

On March 27, 2001, the Board of Supervisors adopted a resolution approving the formation of County Service Area No. 49. The CSA was conditionally approved to provide water and sewer service and local park and recreation facilities and services to 8 parcels located along the east and west sides of Highway 145 (Fresno Coalinga Road) approximately three miles southwest of Five Points. Conditions included the upgrading of the systems before the CSA took responsibility for the services; the financing of services through user fees; a water fee to be based on metered use; provision for the system to function with surface water; provisions for funding the amount of first year's budget; and use of grant funds to replace the existing treatment facility with provision for payment of County costs associated with the grant application. Most significantly the resolution stipulates that "the proposed replacement surface water treatment facility to be constructed with grant funding may only be of sufficient capacity to produce treated water for the existing community" (underline emphasis added). This action is consistent with the General Plan from the perspective that it is addressing the needs for existing users. The formation of the CSA resolves a current problem of providing ongoing services that had previously been provided by a private farmer and a school district who now desire to dispense with the responsibilities. The new CSA presents the long-term challenge of maintaining an adequate and affordable system.

CSA 49 has not yet been activated. The estimated fee for water service in the new CSA 49, without paying back a loan to upgrade the system, is \$50.29 per month and \$77.33 per month for water if loan payback is required. This can be compared with the monthly water service fees for Cantua Creek and El Porvenir, which are \$28.26 and \$57.94 respectively. Note that this is water service only, sewage treatment and the park and recreation services will be in addition to the water service fee.

Experience with CSA Provision of Services on the Westside

An important factor in the evaluation of housing needs on the westside is the public services issue. Common water, sewer and other public services are provided in the

Westside North and Westside South Market Areas through four different types of entities. There are six incorporated cities that provide services to residences, three community service districts, two public utility districts and four County service areas (CSA). The community service districts and the public utility districts serve the communities of Biola, Caruthers, Lanare, Riverdale and Tranquility. Each of these districts functions under a separate Board of Directors and is not affiliated with the County of Fresno. The CSAs are the County service providers for Cantua Creek (CSA 32) and El Porvenir (CSA 30). CSA 40 has been providing services to Del Rio but will be transferring its service to the City of Firebaugh as a result of the recent annexations. CSA 49 is the new service area southwest of Five Points that was previously described. CSA 30 and 32 provide water, sewer, garbage and street lighting to the El Porvenir and Cantua Creek. CSA 40 has been providing water and sewer service to the Del Rio area. Service capacities vary for each district/area. The service capacities were summarized in Table H-27 of the Housing Element at page 7-56.

Each of the service areas has its own characteristics and service facilities so there are limitations to making comparisons but the following table of information from the Resources Division of the Department of Public Works and Planning provides some insight into the service charges that are being assessed for single family residences each month. The sewer service rates for two other districts are shown at the bottom of the table.

Table 3 County Service Area Services and Monthly Costs (\$) for Services to Single Family Residences					
CSA #, location, & # of accts.	Water Service	Sewer Service	Garbage	Street Lighting	Total Monthly Rate
CSA 30 El Porvenir 53	\$57.94	\$23.22	\$12.68	\$3.09	\$96.93
CSA 32, Cantua Creek 73	\$28.26	\$20.37	\$11.01	\$0.62	\$60.26
CSA 40 Del Rio 55	\$40.51	\$23.72	n/a	n/a	\$64.23
Comparable Sewer Rates from Two Districts					
Del Rey approx. 200		\$25.42			
Tranquility approx. 330		\$10.00			

Information prepared several years ago for the Del Rio annexation included a table that compared water and sewer rates between CSA 40 and the City of Firebaugh. Residents of Del Rio now experience significant savings for services provided by the City of Firebaugh since annexation was completed in mid-2003. For example, a residence using 10,000 gallons/monthly will save \$400/year just in two basic services. For a household with an income of \$25,000 this is a significant saving.

Table 4: Comparison of City and CSA 40 Water and Sewer Rates			
Water Rates (Metered)			
Gallons/Month	City	CSA 40	
		High Season (summer)	Low Season (winter)
10,000	\$20.33	\$40.51	\$ 40.51
20,000	\$28.73	\$40.51	\$ 60.37
30,000	\$40.03	\$45.85	\$ 92.67
45,000	\$59.58	\$89.47	\$141.12
Sewer Rates			
No. of Residences	City	CSA 40	
1 Residence	\$10.62	\$23.72	
2 Residences	\$21.24	\$39.46	
3 Residences	\$31.86	\$55.20	

The data suggests there is some correlation between the number of units to be served and the cost of services. This is due in part to the fact that there are certain basic costs of facilities, maintenance and administration that do not change with the number of units and therefore higher costs can be assumed with smaller service areas or in districts with fewer numbers of residences served. This can be a burden on households, especially those in the lower income groups.

The 1999 median income in Cantua Creek was \$26,484. (This median income was 76% of the County median income of \$34,725, that is, more than \$8,000 less than County median.) The following table is provided to illustrate the effect of service rates on households. Since income data for El Porvenir and Del Rio is not available, the median income for Cantua Creek has been utilized in the table. The comparison is based on current service fees for each of the service areas.

Table 5: Service Rates as Percentage of Median Income				
Income Group	Monthly Income based on median income of \$26,484	Percent (%) income for services by location based on the local service fees		
		Cantua Creek (\$60.26)	El Porvenir (\$96.93)	Del Rio (\$64.23)
Median Income	\$2,207	2.7	4.4	2.9
Low Income (80% of median)	\$1766	3.4	5.5	3.6
Very Low Income (50% of median)	\$1104	5.5	8.8	5.8

Economic Viability of a CSA for a New Community Based on Past History/Experience in the Area.

The economic viability of a CSA for a new community is questionable based on trends and past experience, particularly if there will be a high percentage of lower income households in the service area.

There is a continuing trend toward more State and Federal regulation on water and sewage treatment systems. Each new regulation has the potential to require changes to the infrastructure system as well as on-going testing and maintenance of equipment and water quality. While there may be grants to help offset costs of infrastructure improvements, they are not guaranteed. The more critical issue is the long-term, ongoing maintenance and testing costs that must be passed onto the system users because grants typically do not cover on-going maintenance and operations of facilities.

In the past, districts were created when the initial services penciled out. However, overtime the costs of operating the service systems have continued to increase. This can become a financial burden on the users within the system if their incomes do not keep pace with the increases. For lower income families the increases are often more burdensome but the County does not have alternative funding sources to reduce the burden of higher fees. Indicators of the financial burden water and sewer system fees place on residents is illustrated in the incidence of water shutoffs that occur due to failure, or inability, to pay. In the past year El Porvenir has had a 26% water shut-off rate. Cantua Creek and Del Rio have had shut-off rates 5 and 18 percent respectively. The further challenge is what other essentials families must forego to meet their monthly service obligations.

The service history of Cantua Creek provides insight into what can occur with small rural CSAs and isolated subdivisions. Cantua Creek was built about 25 years ago as a subdivision to replace housing in El Porvenir. Federal funds were used to develop the area. The County also built a community center with meeting rooms, kitchen, restrooms, and outdoor playground along with a fire station that housed a fire truck the County acquired for the local fire district. The facility was maintained through the CSA. Some years later the Fire District could no longer afford to man

the Cantua Station so the fire truck was moved to Tranquillity and Cantua Creek and El Porvenir residents were served from there. Also, residents voted a number of years ago to no longer pay to maintain the center (including irrigation of the lawn area) because of their limited ability to pay for their own water and sewer bills. The facility fell into disrepair. Last year the County's CDBG program invested approximately \$70,000 in the rehabilitation of the community center to bring it back up to code, not including the playground and outdoor area. The County has now leased the center to a nonprofit to maintain the facility and to provide neighborhood services for the residents. This history is indicative of the challenges small rural service areas face.

It is the policy of the County to discourage smaller systems based on the limited ability of lower-income families to pay for the services. Further, it is more practical to allow new development where services are available to maximize the existing facilities and spread costs among a larger number of people.

It has been, and continues to be the policy of Fresno County to direct growth to the cities and unincorporated communities because of their designated role as providers of services. While the infrastructure systems may have lesser monthly fees there is the added benefit of proximity to schools, shopping, medical facilities, libraries, religious centers, etc. so families need not drive long distances for these services and the children have the benefit of schools and community programs. There are also issues regarding the cost and level of services for police/sheriff and fire protection if housing is scattered throughout an area. Duplication of services and isolation of families plus potential compatibility and pesticide safety concerns are issues that can arise with housing in proximity to agricultural activities.

Where farmers and ranchers have determined that it is beneficial to the operation to provide employee housing it can be continued. If the farmer can no longer maintain the housing then residents should be directed to the urbanized area.

Viability of Existing Unincorporated Communities

The viability of existing unincorporated communities in the County can also provide insight into the potential viability of a new isolated residential subdivision of comparable size. There were four unincorporated communities with populations ranging from 226 to 240 households in 2000: Biola, Del Rey, Friant and Tranquillity. Each seems to be struggling for economic viability and to hold down rising service costs.

Biola is in relatively close proximity to the metropolitan area so the cost of servicing its facilities is less than a more remote community will be. However, service costs are expected to increase so residents in Biola are promoting a Self-Help development to add population in hopes of offsetting some of the increases. Biola has a long history in agriculture and also has land zoned for commercial and industrial uses making it a more diverse community. Despite the positive aspects of the community it is seeking grants to improve its economy in order to retain its viability. With limited funds available the competition is keen.

Del Rey, like Biola, has both industrial and commercial land so it has potential to be a well-balanced viable community. Like Biola its residents have supported a new subdivision in anticipation of lower costs for services in the community.

Tranquillity has a lower farmworker population than Biola and Del Rey. The local high school provides some diversity in the employment base for the area. Information available to County staff suggests service rates in the community will be going up and prospects are not good for the community.

Friant is very different from the other three communities. Its residents are not reliant on farm work but many have limited incomes. The community has a water system but relies on individual septic systems for the residential and commercial uses except for a small treatment facility for the mobilehome park. The Water Works District has not been successful to date in putting together grants and other funding for the development of a community sewage treatment plant. The lack of the plan severely hinders development potential in the community. This in turn limits the success potential of the Friant Redevelopment Agency.

Each of these comparably sized communities faces challenges with services and with becoming economically viable. They compete for limited grants to improve their economy. And yet, they are established places with varied land uses. If these communities are struggling there is truly a question on the prospect for viability of a new remote subdivision and its CSA.

Viability of CSA 49 With and Without Additional Units

The viability of CSA 49 remains uncertain since the work to activate the CSA has not been implemented to date. There will be an immediate issue relative to the cost of services if the CSA users must repay funds used to bring the systems up to standard. On an on-going basis the cost of services is likely to increase with regulation changes. The residents who rely on this system will likely experience increased costs that are not known today.

The development of additional units in the service area would obviously spread the basic costs among a larger number of user accounts and thereby reduce the costs to individual accounts. This could be a benefit to existing residents in the area if the costs for the system improvement/expansion can be offset by fees for the new development. There does however remain the potential based on experience in other locations that the service area customer base will still not be large enough to retain costs at a reasonable level for lower income residents.

At some point the issue of making a small CSA more viable by adding units and expanding the number of customers must be weighed against the effects on an expanded population with limited access to other services. It must also be evaluated in light of County policy that directs growth to cities and unincorporated communities where not only water and sewer services but also the whole range of public and private services are more accessible.

V. Effects of the Westlands' Land Retirement Program on the Demand for Housing on the Westside

Land Retirement Program in WSMA and Westside Elementary School District

The westside of Fresno County and most specifically lands within the Westlands Water District are experiencing reduced productivity on soils with high salt content due to shallow groundwater and a lack of drainage in the area. A total of 200,000 acres of agricultural land are slated for retirement from irrigated farming. This acreage represents approximately one-third of the Water District land area. Some acquisition has already occurred and additional lands are anticipated for retirement. The potential land retirement area within the Westside South Market Area and the Westside Elementary School District boundaries is depicted in Maps 1 and 2 in Appendix C. If one considers that the majority of the land west of the Interstate 5 Freeway is grazing land then approximately a quarter of the remaining Westside South Market Area is planned for retirement. Approximately 40% of the area within the Westside Elementary School District has been placed within the potential agricultural land retirement area.

Table 6 Land Retirement Potential Westside South Market Area (WSMA) and Westside Elementary School District (WESD)		
	Acreage	Percent
Westside S. Market Area	657,500	
Westlands Water District land within WSMA	253,938	38% of WSMA
Land identified for potential retirement	43,222	17% of Westlands w/in WSMA
Westside Elementary School District	94,913	
Westlands Water District land w/in WESD	86,101	90% of WESD
Land identified for potential retirement	34,118	40% of Westlands w/in WESC

Potential Job Loss in WSMA

The potential retirement of 43,222 acres in the WSMA is approximately 22% of the Westlands Water District's planned land retirement area. It is not possible to know where all the associated workers live and work but the percentage factor can be applied to overall land retirement data to develop an estimate of job loss in the area and the subsequent effect on the need for housing.

The report "Analysis of Economic Impact of Proposed Land Retirement on Westlands Water District" contains an estimate of the short-run losses in westside employment of 1,508 farm sector jobs and 77 non-farm sector jobs for a total of

1,585 jobs. If the WSMA land retirement area has 22% of the total potential land retirement area then potentially 348 jobs (22% Of 1,585) would be lost in the area.

Effect of Land Retirement on Housing

The economic analysis envisions long-run job creation will offset the loss but there would be the interim losses that would affect the need for housing in the area. If unemployed workers and their families leave the area there would potentially be housing available without the need to add to the housing stock. On the other hand some housing will be lost with the closure of farm labor camps and other employee housing on retired parcels. Other farmers may decide to discontinue their farm labor housing which may tend to increase the housing need in the area. Data from the County's Department of Community Health suggests that there are approximately 1,015 employees living in employee housing in the vicinity of the Westside South Market Area in 2002.

It is too early in the land retirement process to know the effect of land retirement on housing and therefore it would seem logical that it is also too soon to consider the creation of new housing opportunities outside of cities and unincorporated communities. The land retirement program will certainly impact the westside cities and communities in the early stages before alternate crop patterns and more diverse job opportunities are developed in the area. The Assistant County Administrative Officer for Economic Development, the cities and numerous organizations throughout the County are bannng together to address the impact of land retirement and seek the means to maintain the economic viability of the region. Much of the work would occur in the urbanized areas under the directives of the County General Plan. Data from the economic analysis report would tend to support the focus on the cities and communities since it reports that that is where the population is concentrated with nearly three-quarters of the region's farm laborers living in rural towns (e.g., Huron, Mendota, or Tranquillity). The report provides a perspective of the farm laborers from the 1998 National Agricultural Workers Survey. The following paragraph is excepted from page 3-8 of the report:

The majority of farm laborers are Hispanic immigrants. The 1998 National Agricultural Workers Survey found that 95 percent of California farm workers surveyed were foreign born, including 91 percent who were born in Mexico.² Almost 90 percent are male.³ About 70 percent are married, with most of the remainder being single and never married. Most have children (about 75 percent). Of these, 60 percent have their families living with them in the U.S. Eighty percent speak little or no English, and 85 percent are unable read or write English. Most have attained a 5th grade level of education, acquired mostly outside the U.S. Nearly three-quarters of the region's farm laborers live in rural towns (e.g., Huron, Mendota, or Tranquillity), with the remainder living in rural unincorporated areas or on farm property. Seventy-six percent rent housing. Nearly 22 percent own their homes. About 30 percent have some experience working in non-farm jobs in the U.S.

² US Department of Labor, Office of the Assistant Secretary for Policy, Office of Program Economics. "Who Works on California Farms? Demographic and

Employment Findings From The National Agricultural Workers Survey.” NAWS Report No. 7. 1998.

³ Alvarado, Andrew, J., et al., “The California Agricultural Labor Market in 1993: A Study of the Effects of the Immigration Reform and Control Act on Central California’s Seasonal Agricultural Workers Between 1988 and 1993.” Center for Agricultural Business, California State University, Fresno. 1996. Farm labor statistics cited in this section derive either from this study or the 1998 National Agricultural Workers Survey.

VI. Other Factors that Relate to the Provision of Housing in the Area

Agricultural Contract Provisions

The vast majority of the land in the WSMA that lies east of I-5 and other lands near Coalinga have been under Williamson Act Contract and Farmland Security Zone agreements. However, reductions in the amount of contracted land can be anticipated due to the retirement of some of the westside farmlands through acquisition by Westlands Water District because publicly owned lands do not remain under contract. The County Assessor's 2000 and 2001 annual subvention reports on the Williamson Act contracted lands show nearly 13,000 acres were removed from contract through acquisition by the Westlands Water District. It is expected that the majority of the anticipated 200,000 acres of land to be retired will be lands that are currently under contract. Refer to Appendix D for map of the WSMA with contract and FSZ lands.

An important factor to consider in assessing the housing needs of the Westside South Market Area is the status of Williamson Act contracts and Farmland Security Zone agreements. The contracts and agreements bind property owners for 10- and 20-year periods with automatic annual renewal. Since the WSMA, with the exception of the spheres of influence of Coalinga and Huron, is designated for agricultural and open space uses it can be difficult or even impossible to make the mandatory finding necessary to cancel contracts. Typically in areas such as the WSMA there is not a basis for early cancellation because there are other lands in the vicinity that are not under contract that could accommodate the proposed use and because there are no plans for development of the area other than within the city spheres of influence. Notices of non-renewal allow parcels to come out of contract in nine or nineteen years under the respective timelines of contracts and agreements.

Commute Distances

The Westside South Market Area is approximately 40 miles wide, extending from the Fresno/Kings County line to the Fresno/Monterey County line and approximately 35 miles from Mt. Whitney Avenue on the north to the most southerly tip of Fresno County. The agricultural area where farmworkers would be commuting is smaller, approximately 25 miles east to west and 30 miles north to south.

A network of State highways, County roads and Interstate 5 provide access to all parts of the WSMA. I-5 traverses the area from the northwest to the southeast. SR33 links Mendota to Coalinga and beyond; SR145 connects Kerman to I-5; SR 269 connects SR 145 at Five Points to I 5 at the south County line via Huron. SR198 extends across the WSMA from the west County line to the east County line via Coalinga. Seasonal flooding and fog are the major problems associated with travel in the WSMA,

The approximate mileage across the market area, linking communities are shown in the following table and on the map in Appendix E.

Road Segment	Distance, in approx. miles
San Joaquin to Five Points	14
San Joaquin to Huron	30
Huron to Coalinga	20
Coalinga northeast to I-5	13
Coalinga to San Joaquin via SR 145	40
Five Points to Riverdale	12
Five Points to Mendota	21
Five Points to Kerman	25
Firebaugh to Coalinga	48

The distances that workers must commute from cities and the unincorporated communities to farm jobs has been a concern for some. Placing housing in relative proximity to jobs minimizes the workers commute and potentially avoids some of the accidents that have occurred with farm labor vans, especially in foggy weather. At the same time, when families reside in isolated areas then it creates service issues previously described, and requires families to travel to shopping, church, schools, and other services.

Future Water Service Cost Issues

The provision of affordable housing necessitates that a number of factors be considered. Among the factors is cost of land. By concentrating development to enhance affordability we also necessitate that common water and sewer systems be provided to accommodate that concentrated development.

A White Paper prepared by the Rural Water Partnership Fund in 2001 entitled "Affordability of Water Service" summarizes the potential National Rural Water Association concerns as follows: "In summary, the affordability of water service is becoming an increasingly important issue on the local, state, and national levels. Water rates will continue to increase because of new regulatory requirements, the need to replace aging infrastructure, and overall cost pressures such as inflation. For the past decade or more, water rates nationally have increased faster than the rate of inflation. If this trend continues (which is likely), affordability concerns will become even more important." The paper states that the federal Safe Drinking Water Act requires the U.S. Environmental Protection Agency (EPA) to evaluate the affordability of water service when it proposes a new regulation and also requires EPA to determine whether its existing regulations were affordable for small water systems. Apparently EPA has determined that every regulation it has issued is affordable and thus there would be no consideration of a variance to address the effects of increased regulation. According to this white paper the EPA determination of affordability is based on a criterion that a household with the median income should be able to pay 2.5% of its pre-tax income for water.

Housing in the Area

In 2000 there were 5,700 households in the WSMA, 1,110 of which were located in the unincorporated area. The following table shows the number of households from both 1990 and 2000 census, along with the housing allocation for the area. Table 9 shows the 1990 occupancy and vacancy rates for the area.

	1990 Households	2000 Households	2007 Allocation
Coalinga	2,898	3,362	256
Huron	934	1,228	313
Unincorporated	956	1,110	197
WSMA Total	4,788	5,700	766

Source: Regional Housing Needs Allocation Plan, 2001

	% Owner-Occupied Households	% Renter-Occupied Households	Vacancy Rate
Coalinga	55.60%	44.40%	10.55%
Huron	33.87%	66.13%	3.01%
Unincorporated	18.23%	81.77%	6.82%
WSMA Total	44.54%	55.46%	8.46%

Source: Regional Housing Needs Allocation Plan, 2001 (US Census)

The County Department of Community Health inspects farm labor housing. The Department's 2002 summary of employee housing showed 1,015 employees residing employee housing. The data does provide the number and type of structures where this employee housing is provided. There were a total of 234 family units, 131 mobile homes and 28 dormitory structures within or adjacent to the Westside South Market Area.

Addressing Housing Needs

The Housing Element of the County General Plan identifies housing problems throughout the County related to housing condition, overcrowding and overpaying. These conditions do exist in the WSMA as well as in other areas of the county.

The County's housing programs are available throughout the County. Some programs are designed solely for owner- or renter-occupied units. It would be appropriate to continue to offer programs for the westside to retain the existing housing stock if the housing is basically sound and water and sewer systems are adequate. Otherwise programs for construction of new structures within the cities and unincorporated communities should be considered. Throughout this study the policies of the General Plan have been referenced and shown to be valid for a number of reasons and circumstances. Therefore it follows that units that can be made safe and sound should generally be rehabilitated and preserved. Otherwise, where housing must be replaced then the replacement housing should be constructed within cities and unincorporated communities where services are in place and the new units can be connected to the water and sewer service and have

access to other local public and private services. Consistent with general plan policy the proliferation of CSAs to serve housing in the WSMA should be minimized.

The County has recently received a technical assistance grant from the Federal Department of Housing and Urban Development (HUD) to have housing specialists consult with the County to develop a strategy to address housing needs on the westside, in areas that will be affected by the land retirement program.

Alternate locations for housing to address the need.

The County General Plan directs that housing in the WSMA be located in the two cities because there are no unincorporated communities in this market area. In the third section of this report we defined the policies that are the basis for this. Development of housing in other areas of this market area would be inconsistent with the General Plan except to the extent that housing units are allowed on agriculturally zoned parcels. The exceptions for housing in agricultural zones are one family dwellings and second dwellings or temporary mobilehomes and also farm labor camps as noted below.

The alternatives to the housing in the cities of Huron and Coalinga and the limited housing opportunities on agriculturally zoned parcels are primarily in the adjacent Westside North Market Area cities and the unincorporated communities.

The options for farm labor camps under the agricultural zoning provisions are either as a by-right use when in conjunction with a bona fide agricultural operation or a conditional use when not carried on as a secondary function in conjunction with a bona fide agricultural operation. A permanent farm labor camp is defined in the County Zoning Ordinance. Under the County's definition it "shall mean living quarters, dwellings, boarding houses, bunkhouses, automobile trailers or other permanent housing accommodations maintained in connection with any farm work or place where farm work is being performed, provided for the housing of five (5) or more farm employees."

VII. Summary and Conclusions of the Study

Limits of the study

This study has focused on housing within the Westside South Market Area and adjacent areas that can provide house for workers in the WSMA. It draws from readily available data and has not included extensive research to determine details pertaining to existing housing and the full extent of the changing patterns for farming in the westside area.

The Study Does Not Address the General Plan Amendment because that is Another Process

This study was intended to address housing in a broad perspective and is not a response to the potential General Plan amendment for which the WHEN submitted an amendment pre-application. At the same time it was that housing proposal that led to the request for the study so the general concepts of such a development are considered in the preparation of the study.

Housing Element Amendments Needed to Correct Identified Errors

As identified in the second section of this study there are several items to be corrected in the Housing Element. These changes will be recommended in the annual report for a future amendment to the Housing Element. The circumstances of the errors and oversights are recognized and stated in Section 2.

Concepts for a New Community

The County General Plan was crafted to restrict urban development in areas that were not already developed. Should it be determined that there is a need for a new community on the westside then it could potentially be created through a General Plan Amendment with an accompanying Specific Plan and the use of standard residential land use designations along with other land use designations to create a diversified new town.

To create new communities necessitates that we look at the full compliment of uses that make up a community. Residents in developments without the full range of uses and services either become dependent on the automobile to get to jobs and services or become isolated without the benefits of all that communities have to offer. At present, jobs or employment opportunities are typically not concentrated in the westside agricultural areas of the county except for some of the Harris Farms operations and the governmental institutions in Coalinga. The farms and ranches are spread out over miles so there will always be a need for agricultural workers to commute particularly since the employers are not tending to increase the number employee housing units.

Conclusion

The Westside South Market Area has very limited potential for new housing outside of the cities of Huron and Coalinga. Housing in the unincorporated area would need to be single family residences or farm labor camp facilities on agricultural parcels.

The Regional Housing Needs Allocation Plan identified a need for 197 additional housing units in the unincorporated portion of the WSMA. That allocation did not evaluate the need for or feasibility of providing housing outside of the cities. It appears that the opportunity for home ownership is limited in the unincorporated area due to the 20 plus-acre zoning. The ability to provide rental housing is restricted unless the housing is a farm labor camp as defined in the County Zoning Ordinance. Further, some of the farmers are closing their farm labor /employee housing. A representative of Harris Farms has made staff aware that they would support a new development that would reduce their need to provide employee housing. Employees in the area may have an interest in other housing particularly when they are no longer working on a farm that provides employee housing.

The need for housing in the area may be offset by the recent and future retirement of agricultural lands and the resulting loss of jobs in the area. The extent of land to be retired in the WSMA is not known for certain but approximately 17% of the WSMA within the Westlands Water District has been identified as a part of the 200,000 acres to be retired. This can be a significant factor that reduces the need for housing in the WSMA.

The need for housing in the unincorporated area is overshadowed by not only the land retirement and related reduction in the number of jobs but also by the policies of the General Plan for agricultural areas which direct growth to incorporated cities and unincorporated communities. Other policies of the plan support this major directive. Other issues that must be considered in addressing the housing need in the area relate to the availability of services. We see from the cited examples that the cost of services for small rural subdivisions can be high and that they can be particularly significant for lower income households. For example, in Cantua Creek and El Porvenir the cost of services is 2.7% and 4.3% of the median income based on the 2000 Census data for Cantua Creek. Beyond water and sewer services there are other public and private services that are important to residents that are not readily accessible to families that live outside of the cities and unincorporated communities in the general area. Police and fire protection services are also significantly limited in these outlying areas. Families must travel to town for food, clothing, health care, fuel, banking, etc. Children may lack the opportunity to participate in after-school activities, etc. Seniors may be too far from health services to receive essential assistance in times of critical need.

The situation of a new development in proximity to Westside Elementary School would afford greater opportunity for elementary school age children to participate in after-school activities and it may allow the school to continue to exist by providing greater enrollment but it does not address the needs of high school students nor other family needs/services and the cost of providing infrastructure services for the long term.

We see the Cantua Creek and El Porvenir subdivisions struggling to maintain their service costs, closing the activity center due to the lack of funds to maintain it and having to travel to Mendota or Coalinga or other locations for supplies and services that are not provided through the neighborhood grocery store.

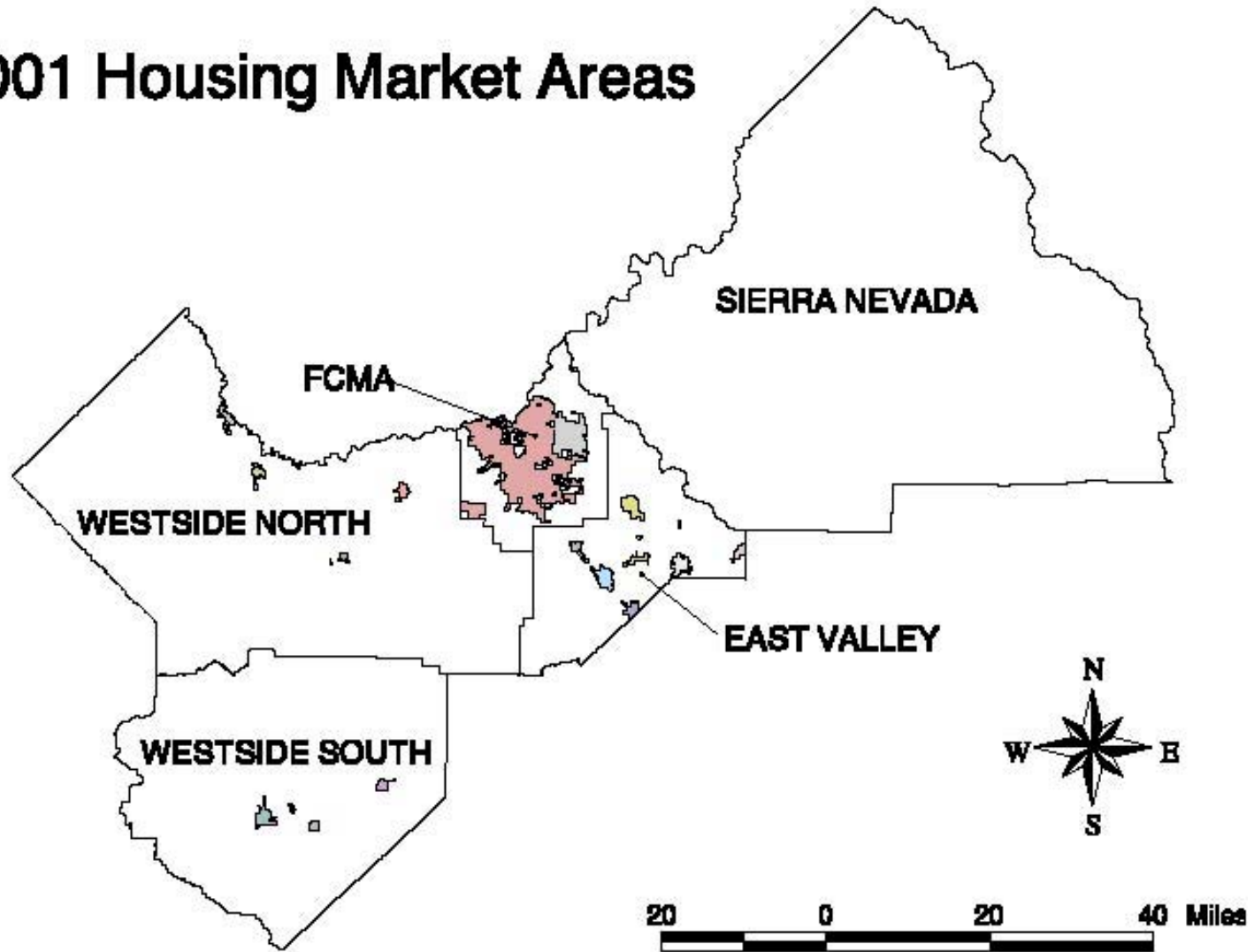
CSA 49 is still in the formation stage because of costs and funding for service upgrades. Development of additional units in the area could enhance the potential feasibility of CSA 49 by adding additional service users but at the same time it would situate more people at a further distance from services essential to families.

The issue is whether to seek to make a CSA more feasible/functional with a larger service base when it will still be marginal and expensive for lower income households and when it places a larger population at a greater distance from police, fire, medical, commercial and other services. Creation of an isolated residential subdivision also places further stress on existing cities and communities that could accommodate the housing and be potentially more economically viable.

The County policy to protect agricultural lands and direct growth to cities has been in place for many years in Fresno County. This assessment of the housing issues suggests that the policy continues to be appropriate for a number of reasons beyond solely the protection of agricultural lands. It is a smart growth policy.

APPENDIX A

2001 Housing Market Areas



APPENDIX B

VISION STATEMENT

This *General Plan* sets out a vision reflected in goals, policies, programs, and diagrams for Fresno County for the period 2000 to 2020 and beyond. This plan carries forward major policies that have been in place since the mid-1970s, but expands and strengthens them to meet the challenges of the 21st century.

The County sees its primary role to be the protector of prime agricultural lands, open space, recreational opportunities, and environmental quality, and the coordinator of countywide efforts to promote economic development.

This General Plan is built on the following ten major themes:

Economic Development: The plan seeks to promote job growth and reduce unemployment through the enhancement and expansion of its traditional agricultural economic base and through the diversification of its economic base, expanding such business clusters as information technology, industrial machinery, and tourism.

Agricultural Land Protection: The plan seeks to protect its productive agricultural land as the county's most valuable natural resource and the historical basis of its economy through directing new urban growth to cities and existing unincorporated communities and by limiting the encroachment of incompatible development upon agricultural areas.

Growth Accommodation: The plan is designed to accommodate population growth through the year 2020 consistent with the California Department of Finance projection of 1.1 million by 2020 (November 1998). This represents an additional population of approximately 344,000 (see Appendix A).

Urban-Centered Growth: The plan promotes compact growth by directing most new urban development to incorporated cities and existing urban communities that already have the infrastructure to accommodate such growth. This plan assumes over 93 percent of new population growth and new job growth will occur within incorporated city spheres of influence and seven percent would occur in unincorporated areas (see Appendix A). Accordingly, this plan prohibits designation of new areas as Planned Rural Community and restricts the designation of new areas for rural residential development while allowing for the orderly development of existing rural residential areas.

*Efficient and Functional
Land Use Patterns:*

The plan promotes compact, mixed-use, and pedestrian and transit-oriented development within city spheres as well as in the county's unincorporated communities.

Service Efficiency:

The plan provides for the orderly and efficient extension of infrastructure such as roadways, water, wastewater, drainage, and expansion services to support the county's economic development goals and to facilitate compact growth patterns. The plan supports development of a multi-modal transportation system that meets community mobility needs, improves air quality, and shifts travel away from single-occupant automobiles to less polluting transportation models.

Recreational Development:

The plan supports the expansion of existing recreational opportunities and the development of new opportunities, particularly along the San Joaquin and Kings Rivers, in the foothills, and in the Sierras, for the employment of county residents and to increase tourism as part of the county's diversified economic base.

Resource Protection:

The plan seeks to protect and promote the careful management of the county's natural resources, such as its soils, water, air quality, minerals, and wildlife and its habitat, to support the county's economic goals and to maintain the county's environmental quality.

Health and Safety Protection:

The plan seeks to protect county residents and visitors through mitigation of hazards and nuisances such as geological and seismic hazards, flooding, wildland fires, transportation hazards, hazardous materials, noise, and air pollution.

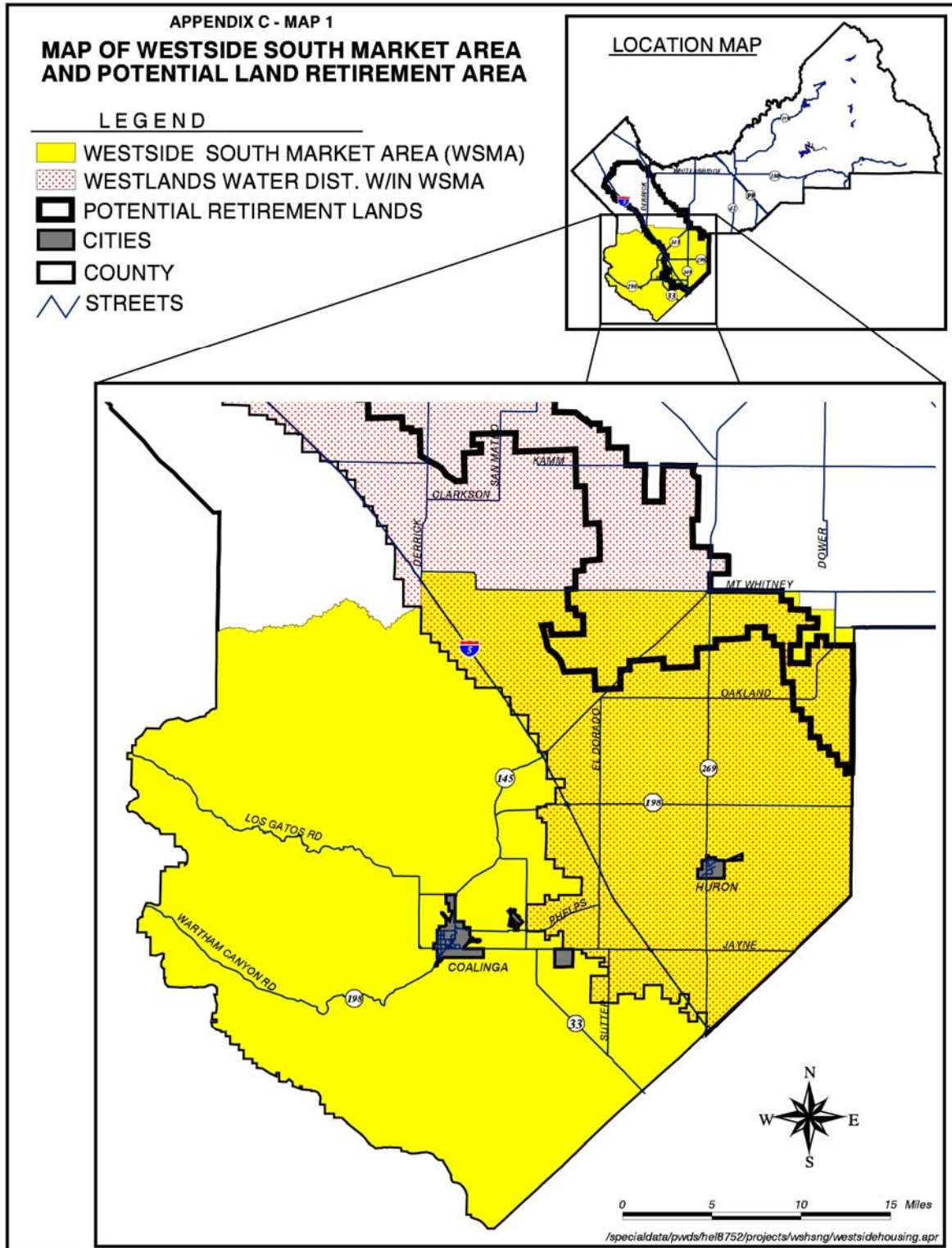
Enhanced Quality of Life:

The plan strives throughout all its elements to improve the attractiveness of the county to existing residents, new residents, and visitors through increased prosperity, attractive forms of new development, protection of open space and view corridors, promotion of cultural facilities and activities, efficient delivery of services, and expansion of recreational opportunities.

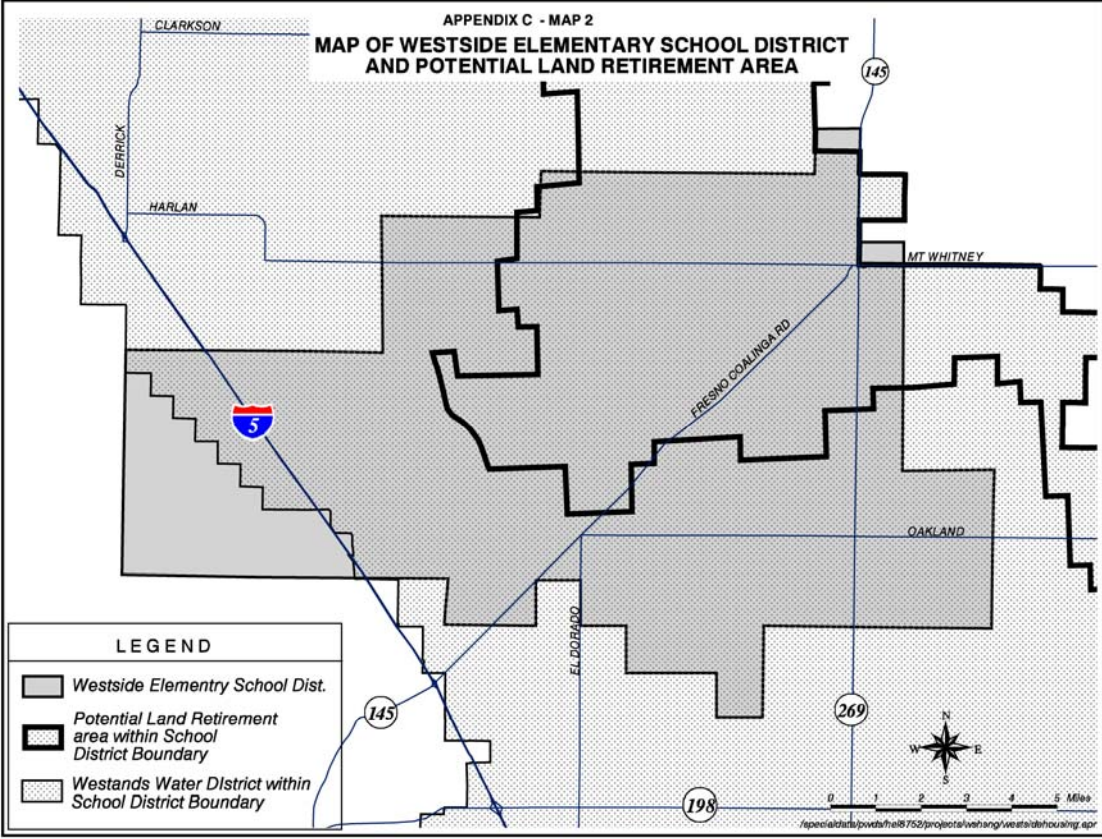
Affordable Housing

The plan seeks to assure the opportunity for adequate and affordable housing for all residents in Fresno County. While directing most new growth to cities, the plan also seeks to provide for the maintenance of existing housing and for new construction in designated areas within the unincorporated area of the county.

APPENDIX C








APPENDIX C



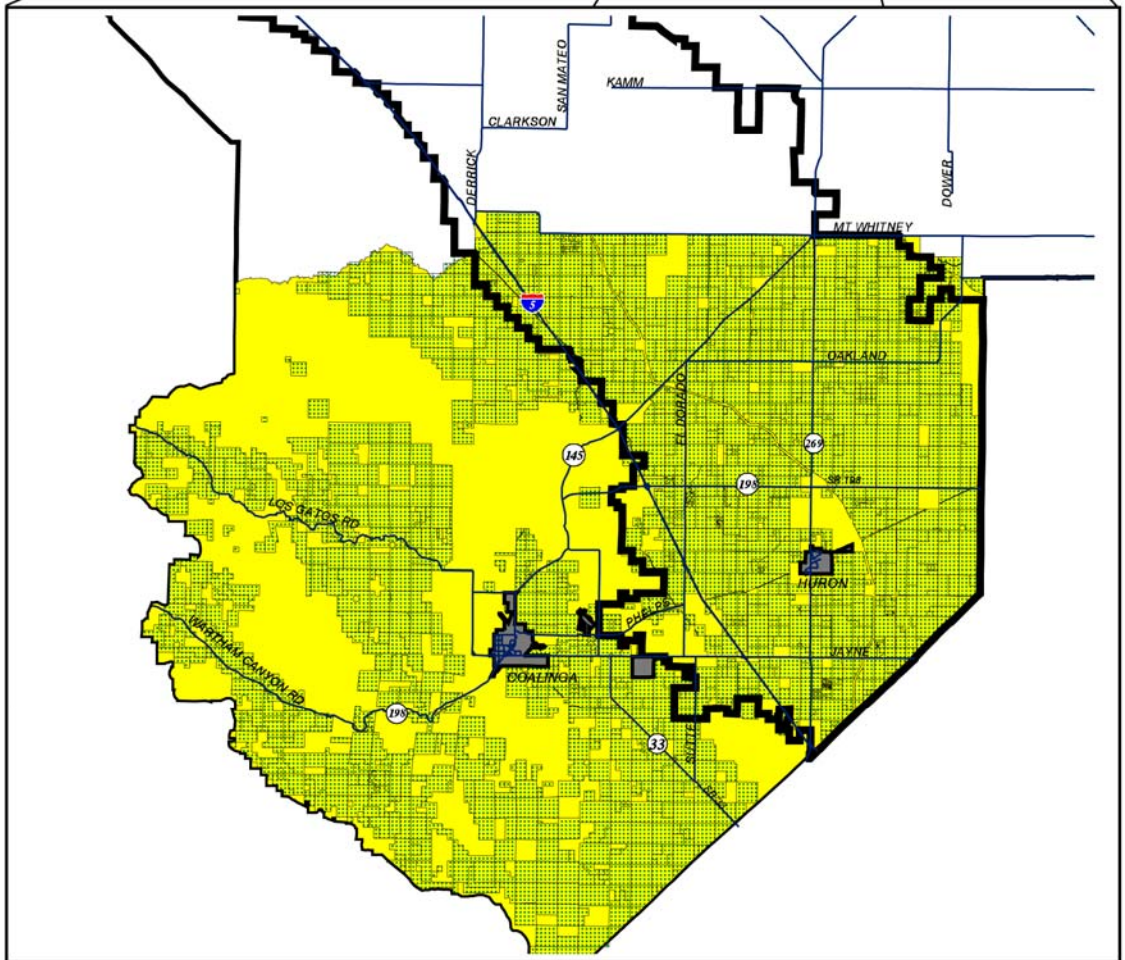
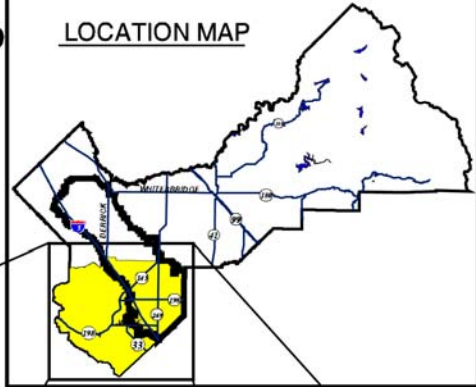
APPENDIX D

APPENDIX D LAND UNDER AGRICULTURAL CONTRACTS AND FARMLAND SECURITY ZONE AGREEMENTS

LEGEND

-  Westlands Water District
-  Lands Under Ag Contract and FSZ Agreements
-  Westside South Market Area
-  City Limits
-  Streets - Major

LOCATION MAP



APPENDIX E

