

4.2 AGRICULTURAL RESOURCES

This section of the Draft Environmental Report ("Draft EIR"; "DEIR") describes the existing agricultural resources within the City of Ione General Plan Planning Area (Planning Area). This section also identifies the potential impacts of implementing the proposed project on such resources as well as the appropriate proposed General Plan policies that reduce the identified impacts. Sources utilized in the preparation of this section include the current City of Ione General Plan Conservation Element, the Amador County General Plan Update and EIR, the California Department of Conservation Farmland Conversion Report (2002 and 2004), the California Department of Conservation Important Farmlands Map, and the USDA 2007 Census of Agriculture.

4.2.1 EXISTING SETTING

AMADOR COUNTY

According to the 2007 Census of Agriculture, Amador County (County) has approximately 479 farms with a total of 163,482 acres in production. The county ranks 46th among California counties, with a 2007 total market value of agricultural products sold of just over \$20.7 million. The county's primary crops, in terms of number of acres planted, are grapes, forage (hay, grass silage, and greenchop), English walnuts, wheat for grain, and corn for grain. The county's primary livestock items are cattle/calves, layers (hens), ducks, goats, and sheep/lambs (USDA, 2009).

CITY OF IONE/PLANNING AREA

Agricultural uses in and around the City of Ione have historically been limited to the production of corn on the Preston farmlands. Within the larger Planning Area, farmland is limited to native pasture (dry), irrigated pasture, small grains such as wheat and barley, and field crops such as sugar beets, alfalfa, safflower, beans, and corn. In general, soils in the city and surrounding area do not possess characteristics favorable to agricultural production. Limiting factors include steep slopes, shallow soils, high erosion potential, poor drainage, a high percentage of stones and rocks in the soil profile, low water-holding capacity, low fertility, poor soil structure, and damage caused by flooding (City of Ione, 1982).

FARMLAND CLASSIFICATION AND RATING SYSTEM

Farmland classification programs are used to determine the agricultural productivity of a particular soil. The two systems used by the United States Department of Agriculture (USDA) and the Natural Resource Conservation Service (NRCS) to determine a soil's agricultural productivity are the Soil Capability Classification System and the Storie Index Rating System. The Soil Capability Classification System takes into consideration soil limitations, the risk of damages when the soils are used, and the way in which soils respond to treatment, whereas, the Storie Index Rating System ranks soils based on their suitability for agriculture.

Land Capability Classification System

The Land Capability Classification System is a system of grouping soils primarily on the basis of their capability to produce common cultivated crops and pasture plants without deteriorating over a long period of time. Capability classes, the broadest groups, are designated by numerals 1 through 8. The numerals indicate progressively greater limitations and narrower choices for practical use. The classes are defined in **Table 4.2-1** below.

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TABLE 4.2-1
LAND CAPABILITY CLASSIFICATION SYSTEM – CLASS DEFINITIONS

Class	Definition
1	Soils have few limitations that restrict their use
2	Soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices
3	Soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both
4	Soils have very severe imitations that reduce the choice of plants or that require very careful management, or both
5	Soils are not likely to erode but have other limitations, impractical to remove, that limit their use
6	Soils have severe limitations that make them generally unsuitable for cultivation
7	Soils have very severe limitations that make them unsuitable for cultivation
8	Soils and miscellaneous areas have limitations that nearly preclude their use for commercial crop production

Source: USDA, 2007a

Capability subclasses are soil groups within any one soil class that indicate the specific limitation of that soil class. They are designated by adding a small letter, e, w, s, or c, to the class numeral, for example, 2e. The capability subclasses are defined in **Table 4.2-2** below.

TABLE 4.2-2
LAND CAPABILITY CLASSIFICATION SYSTEM – SUBCLASS DEFINITIONS

Subclass	Definition
e	Indicates that the main hazard is the risk of erosion unless close-growing plant cover is maintained
w	Indicates that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage)
s	Indicates that the soil is limited mainly because it is shallow, droughty, or stoney
c	Indicates that the chief limitation is climate that is very cold or very dry (used in only some parts of the United States)

Source: USDA, 2007a

Capability subclasses are further delineated into capability units that group soils which are similar enough to be suited to the same crops and pasture plants, require similar management, and have similar productivity.

Storie Index Rating System

The Storie Index Rating System ranks soil characteristics according to their suitability for agriculture. Ratings range from Grade 1 soils (80 to 100 rating), which have few or no limitations for agricultural production, to Grade 6 soils (rating of less than 10), which are not suitable for agriculture. Under this system, soils deemed less than prime can function as prime soils when limitations such as poor drainage, slopes, or soil nutrient deficiencies are partially or entirely removed (University of California, 1978). The six grades, ranges in index rating, and definition of grades, as defined by the NRCS, are provided below in **Table 4.2-3**.

TABLE 4.2-3
STORIE INDEX RATING SYSTEM

Grade	Index Rating	Definition
1 – Excellent	80 through 100	Soils are well suited to intensive use for growing irrigated crops that are climatically suited to the region.
2 – Good	60 through 79	Soils are good agricultural soils, although they may not be so desirable as Grade 1 because of moderately coarse, coarse, or gravelly surface soil texture; somewhat less permeable subsoil; lower plant available water holding capacity, fair fertility; less well drained conditions, or slight to moderate flood hazards, all acting separately or in combination.
3 – Fair	40 through 59	Soils are only fairly well suited to general agricultural use and are limited in their use because of moderate slopes; moderate soil depths; less permeable subsoil; fine, moderately fine or gravelly surface soil textures; poor drainage; moderate flood hazards; or fair to poor fertility levels, all acting alone or in combination.
4 – Poor	20 through 39	Soils are poorly suited. They are severely limited in their agricultural potential because of shallow soil depths; less permeable subsoil; steeper slope; or more clayey or gravelly surface soil textures than Grade 3 soils, as well as poor drainage; greater flood hazards; hummocky micro-relief; salinity; or fair to poor fertility levels, all acting alone or in combination.
5 – Very Poor	10 through 19	Soils are very poorly suited for agriculture, are seldom cultivated and are more commonly used for range, pasture, or woodland.
6 – Nonagricultural	Less than 10	Soils are not suited for agriculture at all due to very severe to extreme physical limitations, or because of urbanization.

Source: University of California, 1978

Planning Area Soil Ratings

The Planning Area contains 54 individual soil types (see **Figure 4.2-1**). **Table 4.2-4** provides a summary of the soil types within the Planning Area, the acreage of each, and the corresponding Storie Index Rating/Grade and Soil Capability Classification.

TABLE 4.2-4
PLANNING AREA SOIL CAPABILITY CLASSIFICATION AND STORIE INDEX RATINGS

Map Unit	Soil Type	Acres within Planning Area	Storie Index		Land Capability Classification
			Rating (0 to 100)	Grade (1 to 6)	
101sa	Amador-Gillender complex, 2 to 15 percent slopes	112.5	0	6	NC
132sa	Creviscreek sandy loam, 0 to 3 percent slopes	24.0	0	6	NC
160sa	Hicksville sandy clay loam, 0 to 2 percent slopes, occasionally flooded	10.6	0	6	NC
222sj	Reiff fine sandy loam, 0 to 2 percent slopes, occasionally flooded	16.1	0	6	NC
AfD	Ahwahnee extremely rocky loam, 9 to 51 percent slopes	9.3	7	6	NC
AnD	Argonaut gravelly loam, 3 to 31 percent slopes	16.9	22	4	4e

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Map Unit	Soil Type	Acres within Planning Area	Storie Index		Land Capability Classification
			Rating (0 to 100)	Grade (1 to 6)	
ApD	Auburn silt loam, 0 to 31 percent slopes	65.5	32	4	4e
ArC	Auburn silt loam, moderately deep, 3 to 16 percent slopes	10.2	0	6	NC
AsB2	Auburn very rocky silt loam, 3 to 9 percent slopes, eroded	213.8	0	6	NC
AsD	Auburn very rocky silt loam, 3 to 31 percent slopes	1,033.0	0	6	NC
AsE	Auburn very rocky silt loam, 31 to 51 percent slopes	134.4	0	6	NC
AtD	Auburn very rocky silt loam, moderately deep, 3 to 31 percent slopes	52.1	14	5	4e
AuD	Auburn extremely rocky silt loam, 3 to 31 percent slopes	362.9	6	6	4e
AuF	Auburn extremely rocky silt loam, 31 to 71 percent slopes	27.2	2	6	NC
AwC	Auburn-Argonaut silt loams, 0 to 16 percent slopes	213.3	38	4	4e
AxD	Auburn-Argonaut very rocky silt loams, 3 to 31 percent slopes	1,395.1	10	6	4e
CP	Clay pits	33.1	0	6	NC
EcD	Exchequer very rocky silt loam, 3 to 31 percent slopes	423.0	5	6	NC
EcE	Exchequer very rocky silt loam, 31 to 51 percent slopes	2,360.1	2	6	NC
ExD	Exchequer and Auburn very rocky loams, 3 to 31 percent slopes	39.2	6	6	NC
Hm	Honcut clay loam, over clay	234.0	0	6	NC
Hn	Honcut silt loam	492.2	100	1	1
Ho	Honcut very fine sandy loam	1,427.5	100	1	1
Hs	Honcut very fine sandy loam, moderately well drained	410.4	81	1	1
Hv	Honcut very fine sandy loam, channeled	831.1	32	4	1
IrE	Inks loam and Rock land, 3 to 45 percent slopes	444.4	5	6	NC
IsE	Iron Mountain very stony loam, 9 to 51 percent slopes	7.4	4	6	NC
LaC	Laniger sandy loam, 2 to 16 percent slopes	253.6	39	4	NC
MP	Mine pits	5.9	0	6	NC
Mn	Mine tailings and Riverwash	702.3	1	6	NC
Mo	Mixed alluvial land	39.5	30	4	4s
Mp	Mixed wet alluvial land	2.0	30	4	NC

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Map Unit	Soil Type	Acres within Planning Area	Storie Index		Land Capability Classification
			Rating (0 to 100)	Grade (1 to 6)	
MrB	Mokelumne sandy loam, 2 to 5 percent slopes	330.0	38	4	NC
MsD	Mokelumne coarse sandy loam, 5 to 36 percent slopes	8.6	25	4	NC
Mt	Mokelumne soils and alluvial land	839.1	0	6	NC
PaD	Pardee cobbly loam, 3 to 31 percent slopes	1,090.0	19	5	NC
PnC	Pentz sandy loam, 2 to 16 percent slopes	1,878.0	26	4	NC
PnD	Pentz sandy loam, 16 to 31 percent slopes	284.8	16	5	NC
PoE	Pentz sandy loam, very shallow, 2 to 51 percent slopes	1,250.1	8	6	NC
PpC	Pentz gravelly sandy loam, 2 to 16 percent slopes	259.0	12	5	NC
PrA	Perkins loam, 0 to 3 percent slopes	196.5	77	2	1
PrC	Perkins loam, 3 to 16 percent slopes	213.1	65	2	3e
Pw	Placer diggings and Riverwash	649.4	2	6	4s
QU	Quarries	5.7	0	6	NC
RbB	Red Bluff-Mokelumne complex, 0 to 5 percent slopes	2,019.5	34	4	2e
RbD	Red Bluff-Mokelumne complex, 5 to 16 percent slopes	4,304.9	30	4	2e
RbE2	Red Bluff-Mokelumne complex, 16 to 36 percent slopes, eroded	545.7	21	4	6e
RmD	Red Bluff-Mokelumne-Mine pits complex, 2 to 16 percent slopes	396.6	19	5	2e
Ro	Rock land	219.6	1	6	NC
RyA	Ryer silty clay loam, 0 to 3 percent slopes	207.1	72	2	NC
Sa	Sedimentary rock land	4,203.1	1	6	NC
SwD	Snelling sandy loam, 9 to 16 percent slopes	112.1	61	2	3e
SyD	Supan very cobbly loam, moderately deep, 3 to 31 percent slopes	25.2	15	5	NC
SyE	Supan very cobbly loam, moderately deep, 31 to 51 percent slopes	50.4	13	5	NC
-	Unknown soils	996.85 ¹	-	-	-
-	Surface water	281.7	-	-	-
		31,769.65			

Source: USDA, 2007b

Notes:

1 – Data is not available for 996.85 acres in the western portion of the Planning Area

NC – Indicates that the soil has not yet been assigned a soil capability classification by the NRCS

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As indicated in **Table 4.2-2** above, approximately 3,060 acres, or 10 percent of the soils within the Planning Area, have a Storie grade of 1 or 2. These soils are generally located within the western portion of the Planning Area, with small areas also occurring within the current city limits and Sphere of Influence (SOI) (**Figure 4.2-1**). The soils within the remaining portions of the Planning Area have Storie grades ranging from 4 to 6, indicating moderate to severe constraints to agricultural production and very low cultivation potential.

IMPORTANT FARMLANDS

The Farmland Mapping and Monitoring Program (FMMP), administered by the California Department of Conservation (DOC), has compiled and continually updates Important Farmland Maps for the state by identifying five agriculture-related categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Each of these categories is defined as follows:

- *Prime Farmland* – Farmland with the best combination of physical and chemical features able to sustain long-term production of agricultural crops.
- *Farmland of Statewide Importance* – Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture.
- *Unique Farmland* – Farmland of lesser quality soils used for the production of the states leading agricultural crops.
- *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. The Amador County Board of Supervisors has defined Farmland of Local Importance within Amador County as those lands that are currently in agricultural production and that are providing an economic return equal to that from prime soil types.
- *Grazing Land* – Land on which the existing vegetation is suited to the grazing of livestock (DOC, 2004a).

Important Farmlands within the Planning Area, as defined by the FMMP, are shown on **Figure 4.2-2** and are summarized in **Table 4.2-5** below. Grazing Land represents the majority of the Important Farmland in the Planning Area and generally surrounds the incorporated area of the city extending out through the SOI and into the Planning Area. The remaining Important Farmlands are located primarily in two areas of the Planning Area: (1) just west of the SOI boundary, and (2) the far southwestern portion of the Planning Area. The only areas within the existing city limits that contain Important Farmland are the sites of the Mule Creek State Prison and adjacent California Department of Forestry (CAL FIRE) Training Facility, just north of State Route (SR) 104.

**TABLE 4.2-5
PLANNING AREA IMPORTANT FARMLAND INVENTORY (ACRES)**

Land Use Category	City Limits	Planning Area (Unincorporated Portion)	Total Planning Area	Percentage of Planning Area
Prime Farmland	45.6	1,374.2	1,419.8	4.4
Farmland of Statewide Importance	0.6	928.3	928.9	2.9
Farmland of Local Importance	181.7	486.1	667.8	2.1
Unique Farmland	1.3	253.9	255.3	0.8
Grazing Land	1,103.4	21,056.2	22,159.6	69.8
Totals	1,332.6	24,098.7	25,431.4	80.0

Source: DOC, 2006a

WILLIAMSON ACT CONTRACT LANDS

The Williamson Act is a mechanism for protecting agricultural and open space land from premature and unnecessary urban development whereby landowners receive property tax assessments which are much lower than normal in exchange for restricting their land to agricultural or related open space use (see the Regulatory Setting below for further details). As of 2007, Amador County had a total of 93,949 acres under Williamson Act contracts (DOC, 2007). As shown in **Figure 4.2-2**, there are currently no Williamson Act lands within the city limits. However, approximately 5,077 acres under Williamson Act contracts are located within the Planning Area, both within and outside the current SOI. This total includes about 2,247 acres of Prime Williamson Act Land and 2,608 acres of Non-Prime Williamson Act Land as well as about 222 acres that are currently in nonrenewal.

FARMLAND CONVERSION

One of the basic underlying premises of agricultural conversion is that the proximity of agricultural land to urban uses increases the value of the agricultural land, either directly through formal purchase offers or indirectly through recent sales in the vicinity, and through the extension of utilities and other urban infrastructure into agricultural areas. The conversion of Important Farmlands in Amador County from 1992 to 2006 is presented in **Table 4.2-6**.

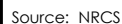
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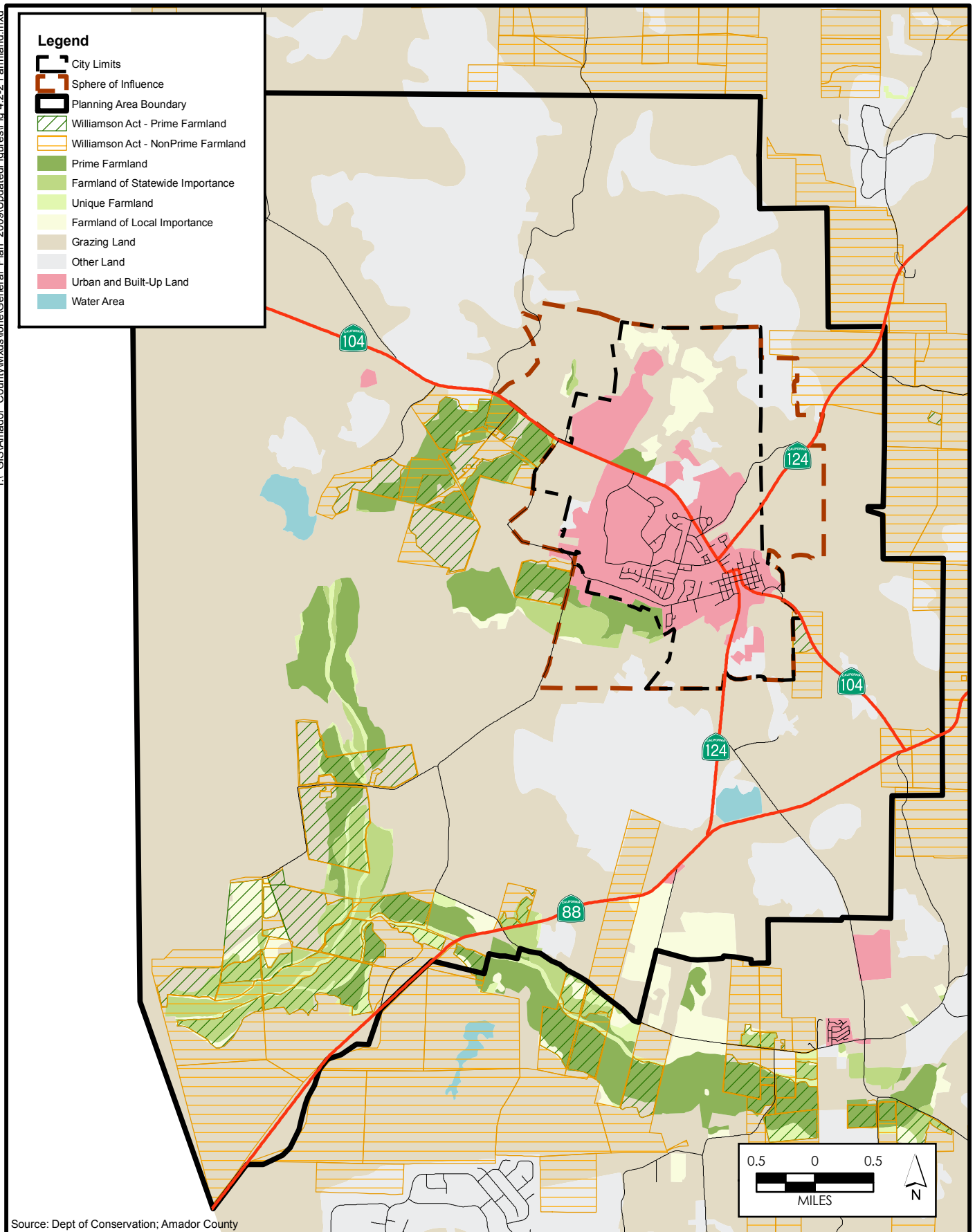
TABLE 4.2-6
AMADOR COUNTY FARMLAND CONVERSION – 1992 THROUGH 2006

Year	Acres Present by Type					
	Prime Farmland	Farmland of Statewide Importance	Unique Farmland	Farmland of Local Importance	Grazing Lands	Total Important Farmlands
1992	3,664	1,540	2,735	3,827	191,459	203,225
1994	3,629	1,511	2,698	3,738	191,189	202,765
1996	3,578	1,510	2,752	3,738	191,371	202,949
1998	3,765	1,739	2,773	2,957	191,370	202,604
2000	3,873	1,849	3,054	2,789	190,791	202,356
2002	3,828	1,814	3,189	2,251	191,039	202,121
2004	3,832	1,850	3,755	1,256	188,219	198,912
2006	3,610	1,717	3,596	1,272	188,569	198,764
14-Year Net Difference	-54	177	861	-2,555	-2,890	-4,461
14-Year Percentage Difference	-1%	11%	31%	-67%	-2%	-2%

Sources: California Department of Conservation, 1996, 1998, 2000, 2002, 2004b, 2006b

As indicated in **Table 4.2-6**, Amador County experienced a net loss of approximately 54 acres of Prime Farmland, 2,555 acres of Farmland of Local Importance, and 2,890 acres of Grazing Land between 1992 and 2006. However, the county also experienced increases in Farmland of Statewide Importance and Unique Farmlands during this period. Overall It should be noted that **Table 4.2-6** above represents the total acreage of farmland converted county-wide and is not limited to acreage within the Planning Area.





City of Lone
Planning Department

Figure 4.2-2
Important Farmlands and Williamson Act Lands

4.2.2 REGULATORY FRAMEWORK

FEDERAL

Farmland Protection Policy Act

The Natural Resources Conservation Service, a federal agency within the U.S. Department of Agriculture, is the agency primarily responsible for implementation of the Farmland Protection Policy Act (FPPA). The purpose of the FPPA is to minimize federal programs' contribution to the conversion of farmland to nonagricultural uses by ensuring that federal programs are administered in a manner that is compatible with state, local, and private programs designed to protect farmland. NRCS provides technical assistance to federal agencies, state and local governments, tribes, or nonprofit organizations that desire to develop farmland protection programs and policies.

NRCS summarizes FPPA implementation in an annual report to Congress. The FPPA also established the Farmland Protection Program and the Land Evaluation and Site Assessment (LESA), which are discussed below.

Farmland Protection Program

NRCS administers the Farmland Protection Program (FPP), which is a voluntary program aimed at keeping productive farmland in agricultural use. Under the FPP, the NRCS provides matching funds to state, local, or tribal government entities and nonprofit organizations with existing farmland protection programs to purchase conservation easements. The goal of the program is to protect between 170,000 and 340,000 acres of farmland per year. Participating landowners agree not to convert the land to nonagricultural use and retain all rights to use the property for agriculture. A conservation plan must be developed for all lands enrolled based upon the standards contained in the NRCS Field Office Technical Guide. A minimum of 30 years is required for conservation easements and priority is given to applications with perpetual easements. The NRCS provides up to 50 percent of the fair market value of the easement being conserved.

To qualify for a conservation easement, farmland must meet the following criteria:

- Prime, Unique, or other productive soil, as defined by NRCS based on factors such as water moisture regimes, available water capacity, developed irrigation water supply, soil temperature range, acid-alkali balance, water table, soil sodium content, potential for flooding, erodibility, permeability rate, rock fragment content, and soil rooting depth;
- included in a pending offer to be managed by a nonprofit organization, state, tribal, or local farmland protection program;
- privately owned;
- placed under a conservation plan;
- large enough to sustain agricultural production;
- accessible to markets for the crop that the land produces; and
- surrounded by parcels of land that can support long-term agricultural production.

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Land Evaluation and Site Assessment

The LESA system ranks lands for suitability and inclusion in the FPP. LESA evaluates several factors, including soil potential for agricultural use, location, market access, and adjacent land use. These factors are used to numerically rank the suitability of parcels based on local resource evaluation and site considerations. The LESA system has spawned many variations, including the California LESA model, described below.

STATE

California Environmental Quality Act (CEQA) Definition of Agricultural Lands

Public Resources Code Section 21060.1 defines “agricultural land” as:

Agricultural land means prime farmland, farmland of statewide importance or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California.

This DEIR utilizes this definition for evaluating impacts associated with the loss of agricultural lands as a result of the project.

California Department of Conservation

The Department of Conservation administers and supports a number of programs, including the Williamson Act, the California Farmland Conservancy Program (CFCP), the Williamson Act Easement Exchange Program (WAEPP), and the Farmland Mapping and Monitoring Program. These programs are designed to preserve agricultural land and provide data on conversion of agricultural land to urban use. DOC has authority for the approval of agreements entered into under WAEPP. The population of California is expected to grow from its current 34 million to 50 million by 2025. This population growth and the need for new homes will put strain on the nation’s leading agricultural economy. Key DOC tools available for land conservation planning are conservation easement grants, tax incentives to keep land in agriculture or open space, and farmland mapping and monitoring.

Important Farmland Inventory System and Farmland Mapping and Monitoring Program

As discussed above, the Important Farmland Inventory System initiated in 1975 by the U.S. Soil Conservation Service (now NRCS) classifies land based on 10 soil and climatic characteristics. The DOC started another similar system of mapping and monitoring for California in 1980, known as the Farmland Mapping and Monitoring Program (FMMP). The DOC system was designed to document how much agricultural land in California was being converted to nonagricultural land or transferred into Williamson Act contracts. DOC’s definitions of Important Farmland types are provided under “Important Farmlands” above. To be shown on the FMMP’s Important Farmland Maps as Prime Farmland or Farmland of Statewide Importance, a piece of land must meet both of the following criteria:

- **Land Use:** The land must have been used for production of irrigated crops at some time during the four years before the Important Farmland Map date, as determined by FMMP staff during examination of current aerial photos, local comment letters, and field verification; and

- **Soil:** The soil must meet the physical and chemical criteria for Prime Farmland or Farmland of Statewide Importance as determined by NRCS.

California Land Evaluation and Site Assessment Model

The California Land Evaluation and Site Assessment (LESA) model was developed in 1997 and was designed based on the federal LESA system and can be used to rank the relative importance of farmland and the potential significance of its conversion on a site-by-site basis. The California LESA model considers the following factors: land capability, Storie index, water availability (drought and non-drought conditions), land uses within one quarter mile, and “protected resource lands” (e.g., Williamson Act lands) surrounding the property. A score can be derived and used to determine if the conversion of a property would be significant under CEQA. The LESA model provides a broad range of scores and other factors that can be considered in determining impact significance.

Williamson Act

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is a non-mandated state program, administered by counties and cities to preserve agricultural land and discourage the premature conversion of agricultural land to urban uses. The act authorizes local governments and property owners to (voluntarily) enter into contracts to commit agricultural land to specified uses for ten or more years. Once enforceably restricted, the land is valued for taxation based on its agricultural income rather than unrestricted market value. This results in a lower tax rate for owners. In return, the owners guarantee that these properties remain under agricultural production for an initial ten-year period. The contract is renewed automatically unless the owner files a notice of non-renewal thereby maintaining a constant ten-year contract. Currently, approximately 70 percent of the state’s prime agricultural land is protected under this act. Prime farmland under Williamson Act includes land that qualifies as Class I and II in the Soil Conservation Service (SCS) classification of land that qualifies for rating 80 to 100 in the Storie index rating. Participation is on a voluntary basis by both landowners and local governments and is implemented through the establishment of Agricultural Preserves and the execution of Williamson Act contracts.

Assembly Bill (AB) 2881 – Right to Farm Disclosure

AB 2881 was passed by the State Legislature in 2008 and became effective January 1, 2009. This bill requires that as a part of real estate transactions, land sellers and agents must disclose whether the property is located within one mile of farmland as designated on the most recent Important Farmland Map. Any of the five agricultural categories – Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land – on the map qualifies for disclosure purposes.

LOCAL

Amador Local Agency Formation Commission

The Amador Local Agency Formation Commission (LAFCo) coordinates logical and timely changes in local governmental boundaries; conducts special studies that review ways to reorganize, simplify and streamline governmental structures; and prepares spheres of influence for each city and special district within the county. LAFCo promotes provision of efficient and economical services while encouraging protection of agricultural and open space lands. Further efforts include discouraging urban sprawl and encouraging orderly formation and

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development of local agencies based upon local conditions and circumstances (Amador LAFCo, 2009).

Approval from the Amador LAFCo will be required for all proposed annexations within the Planning Area and will help to ensure that agricultural lands within the Planning Area are not prematurely developed.

Amador County General Plan

The County of Amador General Plan was adopted by the County Board of Supervisors in 1973 and is currently undergoing an update. The County General Plan is a policy document designed to give long-range guidance regarding the growth and resources of the unincorporated Amador County jurisdiction. It includes objectives, goals, policies, and actions that apply to development within the Planning Area that are outside of the city limits, until such time those areas are annexed into the City as part of the ultimate development under the City's updated General Plan development potential. The Land Use, Open Space, Conservation, Scenic Highways Element within the County General Plan includes the following objectives, goals, policies, and actions relevant to agricultural-related impacts within Amador County:

- Objective 1: To preserve, protect and where appropriate, promote the development of natural resources in water, minerals, timber and soils resources.
- Objective 3: To strengthen the area economy through expanded commercial and industrial activity, protection and expansion of agriculture and forestry and increased local processing of their raw materials.
- Action 4: To provide all reasonable protection and encouragement to the preservation of agricultural soils and continued agricultural use of suitable soils.
- Policy 5: The Planning Commission will continue to study methods of preventing the loss of farm production by premature subdivision and uneconomic taxation through the application of zoning, scenic easements, tax differentials or other means.
- Policy 8: Compatibility of Land Uses: i.e., Urban, Residential, Industrial, Agricultural and Recreational, will be fostered and encouraged. All future reservoir sites, prime farmland or commercial grade timber land, or areas of outstanding scenic or recreational significance shall be preserved against subdivision or other urban development, and zoned to preserve their present use and value.

4.2.3 IMPACTS AND MITIGATION MEASURES

STANDARDS OF SIGNIFICANCE

The following significance thresholds are based on Appendix G of the State CEQA Guidelines. A project is considered to have a significant impact to agricultural resources if it would result in any of the following:

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

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

METHODOLOGY

The following evaluation of potential agricultural impacts of the proposed project was based on a review of the existing City of Ione General Plan, the Amador County General Plan and Zoning Code, the California Department of Conservation Farmland Conversion Reports for 2000 through 2004, the Department of Conservation Important Farmlands Map, and the USDA 2007 Agricultural Census, as well as a field review of the Planning Area. The location and characteristics of the farmland located within the Planning Area, as identified by the FMMP, were compared to the proposed General Plan update and other project components to determine potential impacts related to loss and conversion of such farmland and potential conflicts between proposed urban uses and farmland.

The City of Ione General Plan is intended to be a “self-mitigating” document, in that the General Plan polices are designed to mitigate or avoid impacts on the environment resulting from implementation of the proposed project. To that end, the relevant GPU policies providing mitigation have been identified for each significant impact in this section. If the applicable General Plan policies were determined not to fully mitigate or avoid impacts, then additional mitigation measures have been provided. These additional mitigation measures have been written as policy statements that can be incorporated into the final General Plan. Each impact discussion includes a determination as to whether the impacts would be mitigated to a less than significant level or would remain significant and unavoidable after implementation of the updated General Plan policies.

PROJECT IMPACTS AND MITIGATION MEASURES

Loss and Conversion of Agricultural Land

Impact 4.2.1 Implementation of the proposed General Plan update and its associated project components would result in the loss of Important Farmlands (Prime Farmland, Unique Farmland and Farmland of Statewide Importance) as designated by the Farmland Mapping and Monitoring Program. This is considered a **significant** impact.

According to the FMMP, the Planning Area contains approximately 1,419.8 acres of Prime Farmland, 928 acres of Farmland of Statewide Importance, 667.8 acres of Farmland of Local Importance, and 255 acres of Unique Farmland, both within and outside the existing city limits (see **Table 4.2-5** and **Figure 4.2-2**).

General Plan Land Use Map

Areas Within Existing City Limits

As indicated in **Table 4.2-5** and shown on **Figure 4.2-2**, the city contains approximately 46 acres of Prime Farmland, 0.6 acres of Farmland of Statewide Importance, 182 acres of Farmland of Local Importance, and 1.3 acres of Unique Farmland. Of these 230 acres of Important Farmland, all of the Farmlands of Local Importance as well as much of the Prime Farmlands are located north of SR 104, within the Mule Creek State Prison, Preston School of Industry, and CAL

4.2 AGRICULTURAL RESOURCES

FIRE Training Facility properties. The existing City land use designations and County zoning for this areas are shown in **Figures 3.0-3** and **4.1.4**, respectively. These properties are not currently utilized for agricultural production and have been developed for use by the State as a prison, youth correction facility, and training facility for fire protection personnel, since 1987 and about 1960, respectively. The properties are currently designated Public Service-Agriculture Transition-Mineral (PS-AT-MR) and Public Service-Open Space (PS-OS) under the City's existing General Plan (City of Lone, 1982). The proposed General Plan land use designation for these properties is Public Service (PS), which does not allow for agricultural uses. These properties are anticipated to generally remain in their current uses over the life of the proposed General Plan update; however, the proposed land use designation would allow for further development if such plans arise.

In addition, there is a small area of Prime Farmland located just south of the city core adjacent to the city limits (**Figure 4.2-2** proposed for designation as Special Planning Area (SPA). Each of these areas is anticipated to be developed with urban uses under the development potential proposed by the updated General Plan.

Therefore, implementation of the proposed General Plan update is anticipated to result in the loss of all 230 acres of Important Farmlands (45.6 acres of Prime Farmland + 0.6 acres of Farmland of Statewide Importance + 181.7 acres of Farmland of Local Importance + 1.3 acres of Unique Farmland) within the existing city limits. Loss of this farmland is considered a **significant** impact.

Areas Outside Existing City Limits

The area within the Planning Area that lies outside the existing city limits contains approximately 3,272 acres of Important Farmland (see **Table 4.2-5**). As shown on **Figure 4.2-2**, these acres of Prime Farmland and Farmland of Statewide and Local Importance are located immediately south of the city limits within the SOI, immediately west of the SOI, and throughout the southwestern portion of the Planning Area. The existing City land use designations and County zoning for these areas are shown in **Figures 3.0-3** and **4.1-4**, respectively. The proposed land use designation for these areas is General Agriculture (AG); therefore, these areas are anticipated to remain undeveloped and available for agricultural production during the lifetime of the proposed General Plan and no loss of Prime or Unique Farmland or Farmland of Statewide or Local Importance would occur. Therefore, this is considered a **less than significant** impact.

Sphere of Influence Amendment/Annexations

As part of the project, the City is proposing to amend its Sphere of Influence (SOI) to accommodate expansions to its current Wastewater Treatment Plant (WWTP) by approximately 33.32 acres, and to expand the Old Stockton Road and Industrial Park Special Planning Areas by 81.89 acres.

In addition, the City is proposing to annex parcels currently located within the City's SOI, including one parcel to the northwest and one parcel to the northeast. The northwest parcel (Collins Road Annexation Area) will be rezoned C-3 Heavy Commercial, while the 3.7-acre parcel to the northeast (State Property Annexation Area) will be rezoned PF Public Facilities.

The Wastewater Treatment Plant SOI amendment area is classified by the FMMP as Urban and Built Up Land; therefore, its annexation and future development would not result in the conversion of any Important Farmlands. The Old Stockton Road and Industrial Park Special Planning Areas SOI amendment area contains 33.89 acres classified as Other Land and 48 acres

classified as grazing land. The land use designation for all 81.89 acres will be changed to SPA. In addition, both the Collins Road and the State Property annexation areas are classified by the FMMP as Grazing Land and will be rezoned for commercial and public facilities development, respectively. Therefore, implementation of the proposed SOI amendment and annexation would not result in the conversion and loss of any Important Farmland. This impact is considered to be **less than significant**.

Zoning Code Update

The City is also planning several updates to its Zoning Code as part of the proposed project. These updates involve the addition of new zoning districts as well as amendments to development standards for several existing zoning districts (see Section 3.0, Project Description, for more details). The proposed updates are largely administrative to further clarify the types and forms of uses that are permitted under a particular General Plan land use designation. The proposed zoning code update would not result in the further loss of Important Farmlands within the Planning Area other beyond that created by the General Plan update. The proposed Zoning Code update would have **no impact** on Important Farmlands.

West Ione Roadway Improvement Strategy (WIRIS)

The proposed WIRIS would consist of various improvements to existing roadways and the construction of new roadway segments in order to create a bypass around the city to provide traffic relief through downtown. The general alignment of the proposed bypass is shown on **Figure 3.0-11**. As shown on this figure, the bypass will run immediately adjacent to or through several areas classified as Important Farmland south and west of the City's existing SOI. Therefore, implementation of the proposed WIRIS would have the potential to result in a significant loss of Important Farmland. The WIRIS project will require further, project-level CEQA analysis and documentation prior to its construction, which will determine the precise location and acreage of any Important Farmlands that would be converted and lost due to its construction. However, it is presently known that Important Farmland will be impacted and this impact is considered to be **significant**.

Proposed General Plan Policies and Action Items that Provide Mitigation

The proposed General Plan update contains several goals, policies, and actions that would assist in reducing this agricultural land conversion impact. The following list contains those policies and actions that contain specific, enforceable requirements and/or restrictions and corresponding performance standards that assist in reducing (though not eliminating) this impact.

Conservation Element

Policy CO-10.2: The City shall not approve projects resulting in the loss of prime agricultural lands unless it makes findings that the benefits of the project outweigh the impacts associated with the loss of such agricultural lands.

Implementation of the proposed General Plan policy listed above will minimize the loss of Important Farmland within the Planning Area by discouraging the conversion of prime agricultural lands. However, there is still the potential for Important Farmlands to be converted to urban development as a result of implementing the proposed project.

4.2 AGRICULTURAL RESOURCES

Mitigation Measures

MM 4.2.1 The following actions shall be added to the Conservation Element of the lone General Plan:

The City shall require development to protect a minimum of one acre of existing farmland of equal or higher quality for each acre of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance that would be converted to non-agricultural uses. This protection may consist of the establishment of farmland conservation easements, farmland deed restrictions, or other appropriate farmland conservation in perpetuity, but may also be utilized for compatible wildlife conservation efforts. The farmland to be preserved shall be located within Amador County and must have adequate water supply to support agricultural use.

Implementation of mitigation measure **MM 4.2.1** would reduce the impacts of conversion of any Important Farmlands to nonagricultural use. However, the conversion of Important Farmland is considered a permanent, irreversible impact that cannot be fully mitigated through off-site conservation. No further feasible mitigation is available; therefore, this impact would be **significant and unavoidable**.

Agricultural/Urban Interface Conflicts

Impact 4.2.2 Implementation of the proposed project could result in the placement of urban uses adjacent to agricultural uses within and adjacent to the city. This is considered a **potentially significant** impact.

General Plan Land Use Map

Areas Within and Outside Existing City Limits

Implementation of the proposed City of Lone General Plan Land Use Map would place urbanized land uses adjacent to existing and designated agricultural uses. It is anticipated that as the city develops, agricultural/urban interface conflicts may arise, particularly in those areas outside the city limits. Urban development adjacent to farmland can have negative impacts on continued agricultural activities including crop theft, trespassing and vandalism, disturbances to livestock, and excessive nuisance complaints, all of which can result in growth pressures on farmland. Conversely, residents living adjacent to farmland commonly cite odors, noise, and traffic hazards from farm equipment, dust, and pesticide spray drift as typical land use conflicts.

There are no active agricultural operations within the current city limits. However, there is existing and planned urban development just inside the city limits which is or would be located immediately adjacent to active agricultural operations or lands designated for such use just outside the city limits. As discussed previously in this section, the Planning Area outside the city limits contains approximately 3,042.5 acres of Important Farmland. Additionally, areas within Amador County adjacent to the Planning Area are anticipated to remain in agricultural use for the long term. Therefore, this impact is considered to be **potentially significant**.

Sphere of Influence Amendment/Annexation

As described under Impact 4.2.1 above, the City plans to annex certain parcels and amend its SOI to expand other parcels currently located outside the city limits. The Collins Road

annexation area is adjacent to the Mule Creek State Prison at a major intersection along SR 104, south of which is active farmland. This site would be rezoned for heavy commercial development. The construction and operation of commercial uses at this location would not be expected to result in significant conflicts with the active farmland to the south as they would be separated by a major roadway (SR 104). Annexation of this site would not be expected to result in any new conflicts with surrounding uses and there is **no impact**.

The State Property annexation area is located immediately adjacent to the Preston School of Industry property and is currently, and will continue to be, utilized by the state as part of this facility. Annexation of this site would not be expected to result in any new conflicts with surrounding uses and there is **no impact**.

The 33.32-acre Wastewater Treatment Plant SOI amendment area is located immediately north of land classified as Prime Farmland and designated for agricultural use. However, the area would be designated for Public Facility uses associated with the City's wastewater treatment plant. This use would not be anticipated to conflict with active agricultural operations as they result in similar nuisances (odors, noise, use of common hazardous materials, etc.) and do not attract groups of people. Therefore, this impact is considered to be **less than significant**.

The 81.89-acre SOI amendment for the Old Stockton Road and Industrial Park Special Planning Areas is surrounded by land classified primarily as Grazing Land. The proposed project would expand the Old Stockton Road and Industrial Park Special Planning Areas and designate the SOI amendment area as SPA, thereby resulting in the placement of urban uses adjacent to existing Grazing Land. This is a **potentially significant** impact.

Zoning Code Update

The proposed updates to the City's Zoning Code would be largely administrative, adding new zoning districts and amending development standards for some existing zoning districts. None of these changes would result in the placement of additional urban development near active agricultural operations or otherwise create or add to agricultural/urban interface conflicts. There is **no impact**.

West Lone Roadway Improvement Strategy

The construction of a major bypass route around the City's core and through land classified by the FMMP as Important Farmland would not be expected to result in significant agricultural/urban interface conflicts as no new housing or commercial uses would be developed. However, this roadway would allow for greater public access to these lands and could result in traffic conflicts between motor vehicles and farming equipment. This impact is considered **potentially significant**.

Proposed General Plan Policies and Action Items that Provide Mitigation

The proposed General Plan update contains several goals, policies, and actions that would assist in reducing this agricultural land use conflicts impact. The following list contains those policies and actions that contain specific, enforceable requirements and/or restrictions and corresponding performance standards that assist in reducing (though not eliminating) this impact.

Conservation Element

4.2 AGRICULTURAL RESOURCES

Policy CO-10.2: The City shall not approve projects resulting in the loss of prime agricultural lands unless it makes findings that the benefits of the project outweigh the impacts associated with the loss of such agricultural lands.

Land Use Element

Policy LU-2.4: Promote high quality, efficient, and cohesive land utilization that minimizes negative impacts (e.g., traffic congestion and visual blight) and environmental hazards (e.g. flood, soil instability) on adjacent areas and infrastructure and preserve existing and future residential areas from encroachment of incompatible activities and land uses.

Action LU-2.4.1: Establish development standards in the Zoning Code to address compatibility between existing and proposed development.

Action LU-2.4.2: Minimize impacts between urban and agricultural uses through the use of buffers, increased setbacks, roadways, decreased densities, landscaping, and/or other appropriate methods to avoid conflicts.

Action LU-2.4.3: Promote the disclosure of potential land use compatibility issues in all parts of the City, such as noise, dust, odors, etc., in order to provide potential purchasers with the information necessary to make informed decisions about the Policy Area and its future land uses.

Noise and Safety Element

Policy NS-1.2: Ensure the outdoor and indoor areas of new projects will be located, constructed and/or shielded from noise sources in compliance with the City's noise standards.

Action NS 1.2.1: Require new development of noise-creating uses to conform with the City's maximum noise levels as shown in **Table 6-1** and **6-2**.

Action NS-1.2.2: Require an acoustical analysis as part of the environmental review process when noise-sensitive land uses are proposed in areas where current or projected exterior noise levels exceed the City's standards. The acoustical analysis must be prepared by a qualified person experienced in environmental noise assessment and architectural acoustics and must estimate existing and projected cumulative noise levels and compare those levels to the policies in this element.

Action NS-1.3.1: Require an acoustical analysis as part of the environmental review process when proposed non-residential land uses are likely to produce noise levels that exceed the City's noise standards. The acoustical analysis must be prepared by a qualified person experienced in environmental noise assessment and architectural acoustics and must estimate existing and projected cumulative noise levels and compare those levels to the policies in this element.

Action NS-1.4.1: Limit construction activity to the hours of 7:00 am to 7:00 pm weekdays and 8:00 am to 6:00 pm weekends, when construction is conducted in proximity to residential land uses.

Action NS-1.4.2: Restrict the hours of operation of loading docks, trash compactors and other noise-producing uses in commercial areas with the potential to significantly impact noise-sensitive land uses.

As discussed in the Regulatory Framework of this section, newly passed state legislation (AB 2881) requires that as part of real estate transactions, land sellers and agents must disclose whether a property is located within one mile of farmland as designated on the most recent Important Farmland Map prepared by the FMMP. Furthermore, proposed General Plan Policy LU-2.4 would promote the disclosure of all land use compatibility issues including those associated with agriculture. These notification requirements would inform new residents near farmland of the potential nuisances associated with active agricultural operations and are intended to reduce nuisance complaints.

The application of pesticides is regulated by both the state and Amador County. California Government Code Food and Agricultural Section 12972 states that the use of any pesticide by any person must be applied in a manner that prevents substantial drift to non-target areas. Additionally, Amador County's Agricultural Commissioner operates a pesticide use enforcement program to ensure the proper, safe, and efficient use of pesticides as well as the protection of the public health and safety within the county.

Compliance with the existing regulations described above will help minimize potential agriculture/urban interface conflicts by requiring noticing of new residents near farmland and preventing the improper use and application of pesticides. Implementation of the proposed General Plan policies and associated action items listed above would further assist in reducing conflicts within the Planning Area by encouraging infill development and preservation of agricultural areas, by requiring buffers, increased setbacks, landscaping and other features at development boundaries, and by protecting sensitive uses from excessive noise. However, potential conflicts would not be fully mitigated, especially with regard to the potential for farm equipment and vehicle conflicts on area roadways, potential trespassing and vandalism to active farmlands, and growth pressure on farmland in proximity to urban uses in the city. No further feasible mitigation is available; therefore, this impact is **significant and unavoidable**.

Mitigation Measures

None available.

Conflicts with Williamson Act Contracts

Impact 4.2.3 Implementation of the proposed General Plan could result in a conflict with active Williamson Act contracts. This is considered a **potentially significant** impact.

Pursuant to Government Code Section 51243, the City is required to provide for the exclusion of uses other than agricultural, and other than those compatible with agricultural uses, for the duration of a Williamson Act contract. If a city annexes land under a Williamson Act contract, the city must succeed to all rights, duties, and powers of the county unless conditions in Government Code Section 512343.5 apply to give the city the option to not succeed the contract. As previously discussed and indicated in **Figure 4.2-2**, in 2007 the Planning Area contained 5,077.47 acres under Williamson Act contracts, none of which are located within the existing city limits.

4.2 AGRICULTURAL RESOURCES

General Plan Land Use Map

Areas Inside of Existing City Limits

There are no lands within the existing city limits that are currently under a Williamson Act contract. Therefore, implementation of the proposed project would have **no impact** on Williamson Act lands within the existing city limits.

Areas Outside of Existing City Boundaries

Located within the Planning Area and currently beyond the existing city limits are about 5,077 acres subject to Williamson Act contracts. Most of this land is proposed for designation as either General Agriculture (AG) or Open Space (OS). These designations would allow these lands to continue in agricultural operation and would not result in any conflicts with a Williamson Act contract. However, portions of three parcels located southeast of the city and currently under Williamson Act contracts totaling 91.09 acres are proposed for designation as Special Planning Area (SPA) (Triangle Policy Area). This SPA designation would allow for various types of urban development. Such urban development would impede the ability for the landowners to farm their land according to the Williamson Act contracts and would therefore be in violation of these contracts. This impact is **potentially significant**.

Sphere of Influence Amendment/Annexations

The annexation and potential future development of the Collins Road and State Property annexation areas, as well as the SOI amendment areas for the Wastewater Treatment Plant and the Old Stockton Road and Industrial Park Special Planning Areas are not subject to Williamson Act contracts and are not utilized for agricultural production. There is **no impact**.

Zoning Code Update

The proposed updates to the City's Zoning Code would not result in any conflicts with an active Williamson Act contract. There is **no impact**.

West Lone Roadway Improvement Strategy

The proposed bypass would be constructed along the boundaries of numerous parcels currently subject to Williamson Act contracts (see **Figures 4.2-2** and **3.0-11**). The final alignment and specific designs for the bypass have not yet been completed, so it is not possible to determine if it would require development within these parcels and would therefore result in conflicts with the applicable Williamson Act contracts. However, there is potential that conflicts would occur and this impact is considered **potentially significant**. The WIRIS project will require further, project-level CEQA documentation prior to its construction that will determine if the project would encroach upon lands currently subject to a Williamson Act contract.

Proposed General Plan Policies and Action Items that Provide Mitigation

The proposed General Plan update contains several goals, policies, and actions that would assist in reducing this Williamson Act conflict impact. The following list contains those policies and actions that contain specific, enforceable requirements and/or restrictions and corresponding performance standards that assist in reducing (though not eliminating) this impact.

Conservation Element

Policy CO-10.2: The City shall not approve projects resulting in the loss of prime agricultural lands unless it makes findings that the benefits of the project outweigh the impacts associated with the loss of such agricultural lands.

Mitigation Measures

MM 4.2.3 The following policy shall be added to the Conservation Element of the City of Lone General Plan:

The City shall not support the development or conversion of any parcel subject to a Williamson Act contract until said contract has been terminated through the nonrenewal method pursuant to Government Code Section 51245.

With implementation of the proposed General Plan policy listed above, as well as mitigation measure **MM 4.2.3**, this impact would be reduced by encouraging infill development and the preservation of agricultural land. However, the development and population growth expected to occur as a result of the proposed project would still place pressure on land owners to develop and encourage non-renewal of Williamson Act contracts. Therefore, this impact is considered to be **significant and unavoidable**.

4.2.4 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

CUMULATIVE SETTING

As indicated in **Table 4.2-6** above, Amador County experienced a net loss of approximately 54 acres of Prime Farmland, 2,555 acres of Farmland of Local Importance, and 2,890 acres of Grazing Land between 1992 and 2006. The existing and projected future urban development throughout the state is expected to further contribute to the continued loss of important farmlands. The cumulative setting includes reasonably foreseeable development, including planned and proposed development, anticipated throughout Amador County (see Section 4.0, Assumptions, for a further description of cumulative growth conditions) under buildout conditions (occurring after year 2030). However, it is acknowledged that cumulative conversion of Important Farmland associated with the proposed project is of statewide concern. While the focus of the cumulative impact analysis is Amador County, it is acknowledged that cumulative important farmland conversion contributions by the proposed project are of a statewide concern. To this end, analysis of the cumulative impact of the proposed project incorporates statewide data, as described in "Methodology" above.

CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Impacts to Agricultural Resources

Impact 4.2.4 Implementation of the proposed project, along with other proposed development in Amador County, would contribute to the cumulative conversion of Important Farmlands to other uses and may increase agriculture/urban interface conflicts. This is a **cumulatively considerable** impact.

4.2 AGRICULTURAL RESOURCES

As previously discussed, implementation of the City of Ione General Plan and other components of the proposed project would result in the direct and indirect conversion of and conflicts with agricultural resources in and adjacent to the Planning Area. Important Farmland conversions expected to result from implementation of the proposed project would represent about approximately 10,195 acres of Important Farmland acreage without Grazing Lands inventoried in Amador County in 2006.

It is important to note that farm/grazing land conversions associated with implementation of the proposed General Plan Land Use Map and WIRIS bypass project would be in addition to Important Farmland conversions associated with all other development anticipated under the applicable land use plans of Amador County and the cities of Jackson, Amador City, Plymouth, and Sutter Creek. Urban development within Amador County alone has resulted in the loss of approximately 4,461 acres of Important Farmland between 1992 and 2006 (see **Table 4.2-6**).

Proposed General Plan Policies and Action Items that Provide Mitigation

The proposed General Plan update contains several goals, policies, and actions that would assist in reducing this cumulative agricultural resource impact. The following list contains those policies and action items that contain specific, enforceable requirements and/or restrictions and corresponding performance standards that assist in reducing (though not eliminating) this impact. Since these policies and action items have been described in detail in prior impact discussions for this section, the following is limited to only listing the policy and action item numbers.

Conservation Element

Policy CO -10.2

Land Use Element

Policy LU-2.4, Action LU-2.4.1, Action LU-2.4.2, Action LU-2.4.3

Noise and Safety Element

Policy NS-1.2, Action NS 1.2.1, Action NS-1.2.2, Action NS-1.3.1, Action NS-1.4.1, Action NS-1.4.2

Mitigation Measures

Implementation of the above proposed General Plan policies and actions, as well as mitigation measures **MM 4.2.1** and **MM 4.2.3** would reduce the proposed project's contribution to cumulative impacts to agricultural resources. However, implementation of the proposed project would still substantially contribute to cumulative losses of farmland and urban/agriculture conflicts that could result in further losses. Therefore, the contribution to cumulative impacts is **cumulatively considerable** and **significant and unavoidable**, and no additional feasible mitigation measures are available that would mitigate the cumulative impact below a level of significance.

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4.2 AGRICULTURAL RESOURCES

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