
6.3 AGRICULTURAL RESOURCES

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INTRODUCTION

This section of the EIR examines the effects of implementation of the Draft Sutter County General Plan (proposed General Plan) on agricultural resources and operations in the policy area and on nearby lands. This section analyzes the potential conversion of farmland to non-agricultural uses, the potential conflicts with existing zoning for agricultural uses or land under Williamson Act contract, and the potential conflicts with County goals and policies that may lead to substantial physical effects on the environment.

The proposed General Plan includes policies that focus on agricultural land preservation, economic development for agricultural industries, and promoting sustainable agricultural practices. The County's proposed General Plan focuses growth within rural communities and designated growth areas while preserving agriculture, the county's dominant use.

Two comment letters were received regarding agricultural resources in response to the Notice of Preparation (NOP). Comments from Placer County encouraged agricultural and open space buffers to separate the future growth areas of East Nicolaus and Trowbridge from Placer County. The use of buffers to separate land uses is discussed in Chapter 4, Land Use Consistency and Compatibility. A letter from an individual county resident reiterated the agricultural nature of the county and discussed the potential growth of the Sutter Rural Planned Community Growth Area. New land uses and growth in the county are discussed in Chapter 4, Land Use Consistency and Compatibility and Chapter 5, Population, Employment, and Housing.

Data for this section was taken from the 2008 *Sutter County General Plan Update Technical Background Report* (TBR), the California Department of Conservation Farmland Mapping and Monitoring Program, the *Land Use Alternatives Analysis* (September 2009), aerial photographs of the county, and the Natural Resources Conservation Service Soil Survey.

The TBR is available electronically on the County's website (<http://www.co.sutter.ca.us/pdf/cs/ps/gp/tbr/tbr.pdf>) and on CD at the back of this document.

ENVIRONMENTAL SETTING

The discussion of agricultural resources included below is presented on a countywide basis. There are no unique issues present in any of the five Growth Areas associated with agricultural issues; therefore, these areas of the county are not specifically discussed in the environmental setting.

Agricultural Production

Sutter County is located within the northern portion of California's Central Valley in the area known as the Sacramento Valley. It contains some of the richest soils in the state. These soils, combined with abundant surface and subsurface water supplies and a long, warm growing season, make the county's agricultural resources very productive.

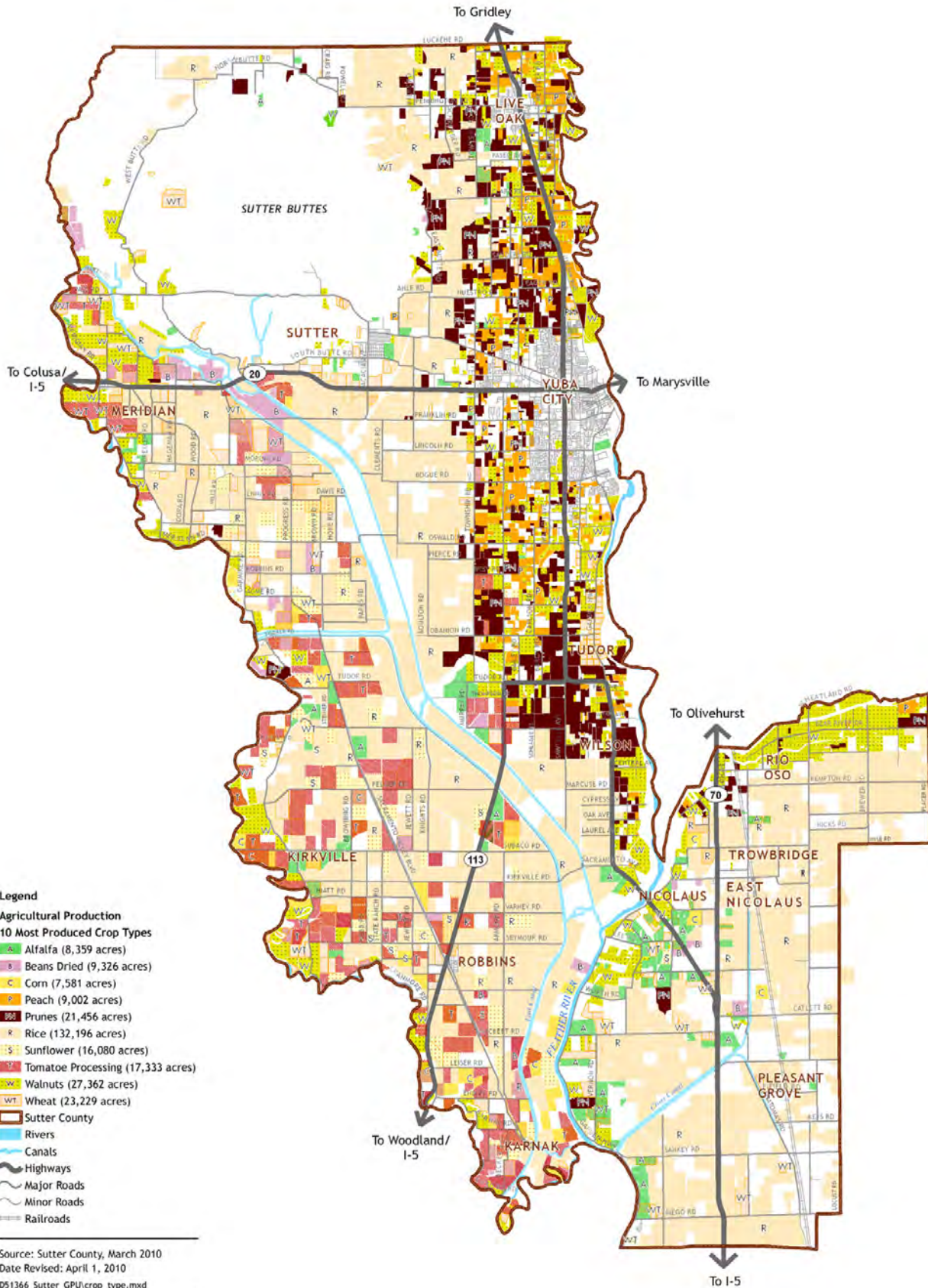
Sutter County is one of California's leading agricultural counties, with over 90 percent of the county's total land acreage currently being used for agricultural purposes.¹ The county has continued to stay predominantly agricultural, unlike other historically agricultural counties such as Fresno, Tulare, Monterey, and Kern. Agricultural use in those counties has dramatically decreased. Even though agricultural production is dependent on weather and economic market fluctuations, local agricultural market revenues continue to rise in Sutter County.

Agricultural activities in the county can generally be placed into one of two classes; either intensive agriculture, which includes field crops, seed crops, vegetable crops, fruit and nut crops, nursery stock and apiary products (bee keeping), or extensive agriculture, which involves animal husbandry forms of agriculture (see Figure 6.3-1). Rice fields are by far the single most common crop grown in the county, covering approximately 132,196 acres of the policy area. Row and field crops (approximately 103,364 acres), and orchards (approximately 36,364 acres consisting primarily of walnut and peach) are the next most common types, but alfalfa, vineyards and irrigated pasture are also found in relatively small areas distributed throughout the policy area.² Please refer to Section 4.2, Agriculture, Soils, and Mineral Resources, of the TBR for more specific information pertaining to a further discussion of the types of agricultural activities, farm sizes, and farm value of agricultural production in the county.

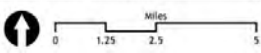
California Department of Conservation Important Farmland Classifications

The California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) combine technical soils ratings and current land use information to create an inventory of Important Farmland. Information on soils is primarily taken from the U.S. Department of Agriculture soil surveys. The CDC divides Important Farmland into four categories: (1) Prime Farmland, (2) Farmland of Statewide Importance, (3) Unique Farmland, and (4) Farmland of Local Importance. According to the most recent information available, the county contains 165,165 acres of Prime Farmland, 105,979 acres

1 Sutter County, August 2009; California Department of Conservation, Farmland Mapping & Monitoring Program, 2006, revised March 16, 2010.
2 GIS data for Sutter County, March 2010.



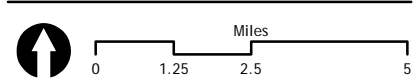
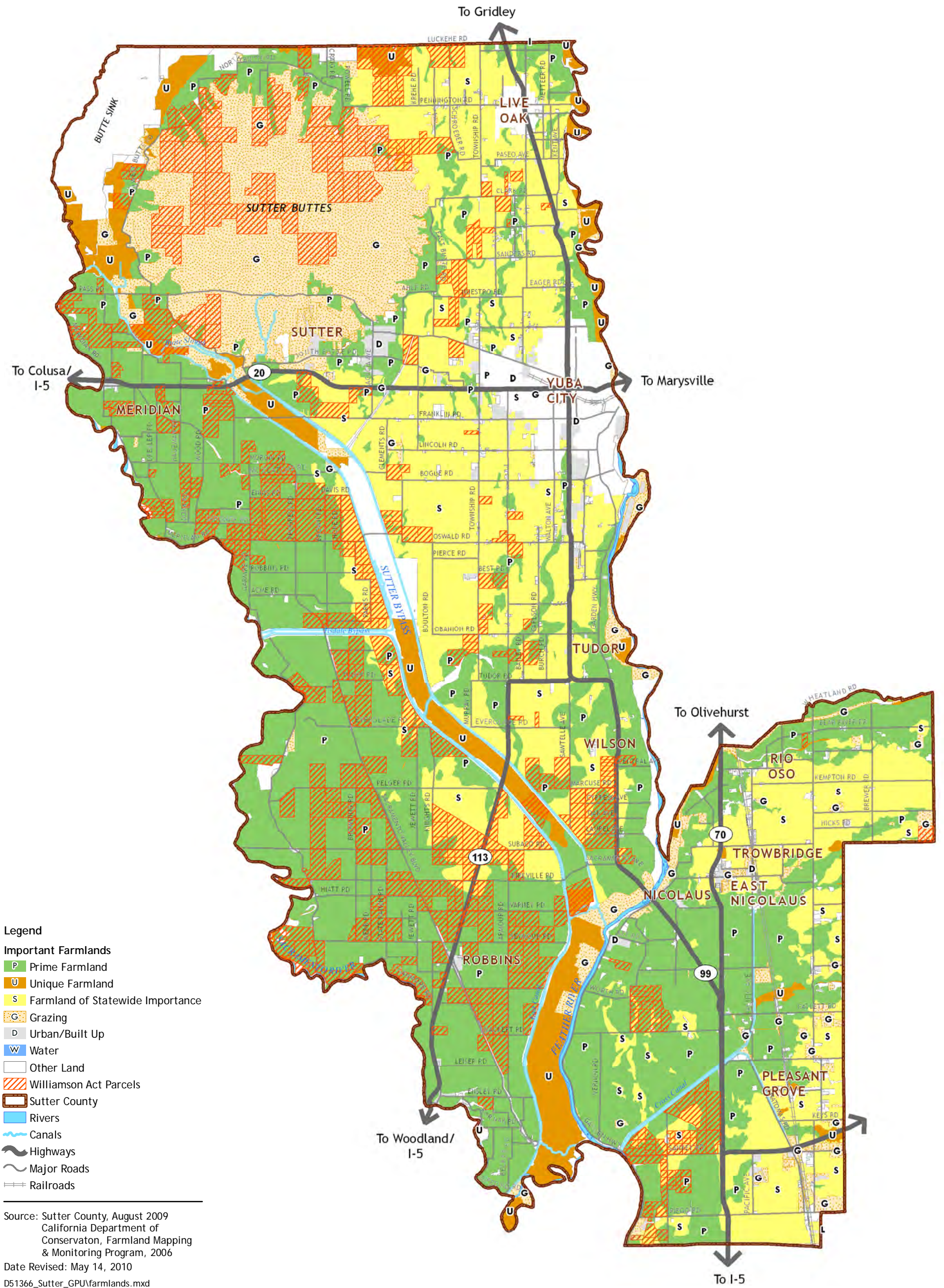
04126 | JCS | 10



of Farmland of Statewide Importance, and 19,049 acres of Unique Farmland.³ Important Farmland category definitions and Farmland acreages within the policy area are shown in Table 6.3-1. The FMMP classification is based on multiple factors, including soil type, the type of crop produced, agricultural zoning, and potential for irrigation. Important Farmland in the policy area is shown on Figure 6.3-2. More detailed descriptions of farmland types can be found in Section 4.2, Agriculture, Soils, and Mineral Resources, on page 4.2-12 of the TBR.

Land Classification	Definition	Acres within Policy Area ¹
Prime Farmland	Prime Farmland generally consists of Class I and II soils. They have the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods.	165,165
Farmland of Statewide Importance	Similar to Prime Farmland but with some minor differences, such as greater slopes or less ability to store soil moisture. The land must have been used for irrigated agricultural production some time during the four years prior to the mapping date.	105,979
Unique Farmland	Farmland that is not classified as prime or of statewide importance, which produces one of California's 40 leading economic crops, such as grapes, artichokes, avocados, and dates. Soil characteristics and irrigation are not considered.	19,049
Farmland of Local Importance	Land other than Unique Farmland, which may be important to the local economy due to its productivity or value. Determined by each county's board of supervisors and a local advisory committee.	0
Grazing Land	Land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for Grazing Land is 40 acres.	51,205
Urban and Built-up Land	Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.	4,813
Other Land	Land not included in any other mapping category. Examples of land classified as Other Land include low density rural developments; timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is also mapped as Other Land.	32,664
Total		378,875
Source: Sutter County, August 2009; California Department of Conservation, Farmland Mapping & Monitoring Program, 2006, revised March 16, 2010.		

³ Sutter County, August 2009; California Department of Conservation, Farmland Mapping & Monitoring Program, 2006, revised March 16, 2010.



Soils

The Natural Resources Conservation Service (NRCS, formerly the Soil Conservation Service) has mapped over 40 individual soil units in the county (see Figure 6.3-3).

The predominant soil series in the county are the Capay, Clear Lake, Conejo, Oswald, and Olashes soils, which account for over 60 percent of the total land area. The remaining soil units each account for smaller percentages of the total land area. The Capay and Clear Lake soils are generally present in the western and southern parts of the county. The Conejo soils occur in the eastern part closer to the incorporated areas of the county. Oswald and Olashes soils are located in the central portion of the county extending north to south, with scattered areas along the southeastern edge of the county.

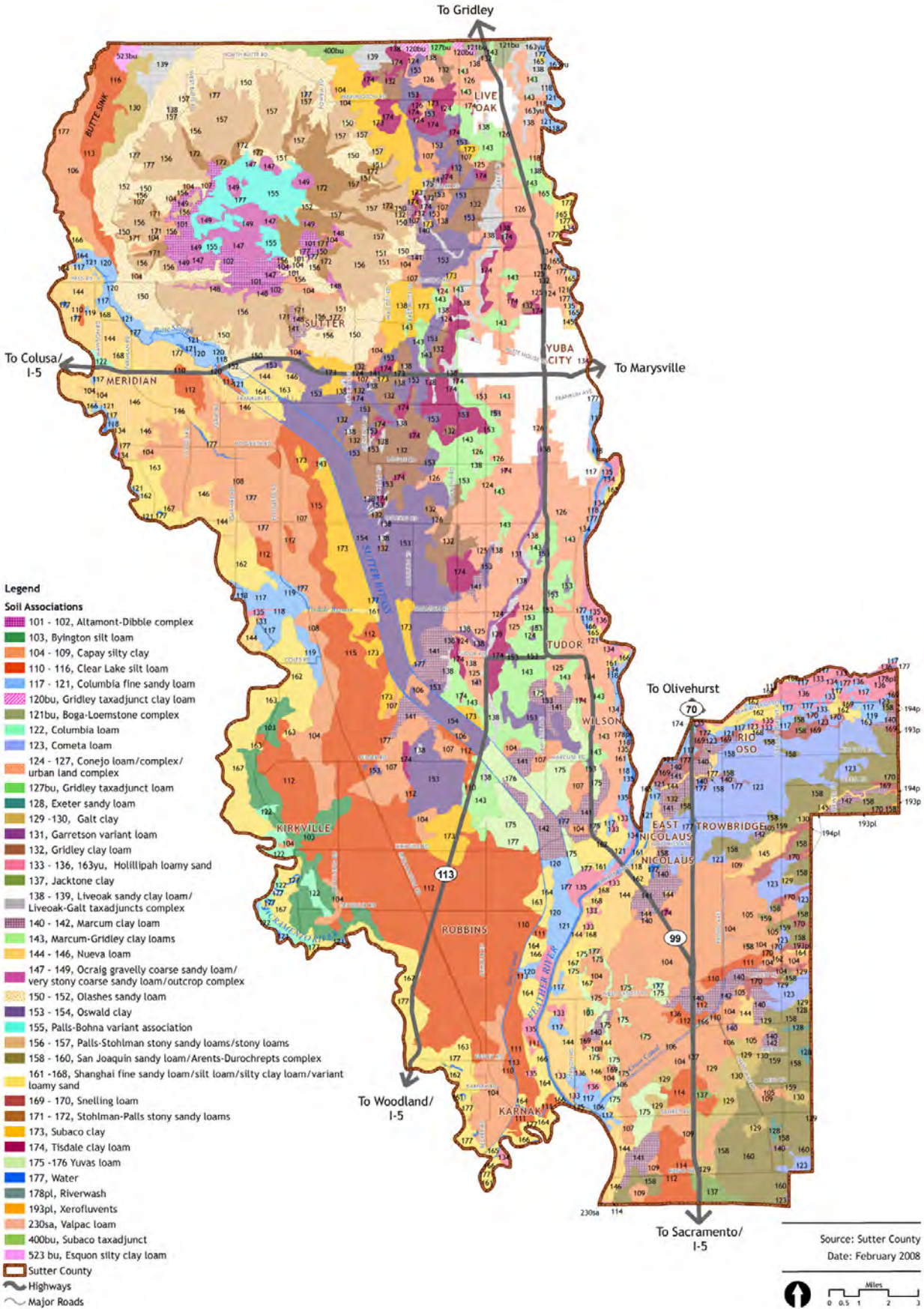
Soil descriptions for the principal soil units in the county are provided in Section 4.2, Agriculture, Soils, and Mineral Resources, on page 4.2-11 of the TBR. These descriptions, which were developed by the NRCS, are for native, undisturbed soils and are primarily associated with agricultural suitability. Soil characteristics may vary considerably from the mapped locations and descriptions due to development and other uses. Geotechnical studies are required to identify actual engineering properties of soils at specific locations to determine whether there are specific soil characteristics that could affect foundations, drainage, infrastructure, or other structural features.

Capability Rating

There are several methods for classifying soil quality for agricultural uses. One method involves a soil capability rating provided by the NRCS. Capability ratings indicate, in a general way, the suitability of soils for most kinds of field crops. The classes are developed according to the limitation of the soils when used for field crops, the risk of damage when they are used, and the way they respond to treatment. The broadest capability groups are designated by Roman numerals I through VIII. Prime Farmland, which comprises approximately 165,165 acres in the policy area, usually consists of Class I and Class II soils.

Storie Index Rating

The NRCS has identified and mapped soils in Sutter County in the Sutter County Soil Survey and rated suitability of soils for agriculture using the Storie Index. This index expresses numerically the relative degree of suitability of a soil for general intensive agriculture, as it exists at the time of evaluation. The rating is based on soil characteristics only and is obtained by evaluating such factors as soil depth, surface texture, subsoil characteristics, drainage, salts and alkali, and relief.



04/12/16 JCS | 10

Williamson Act Contracts

State programs continue to preserve important and valuable agricultural land in Sutter County through the Williamson Act. As of March 2010, the County had 65,247 acres protected as agricultural land under the Williamson Act (see Table 6.3-2).⁴ This program gives agricultural producers tax incentives to place the land in 10-year contracts to prevent development during the term of the contract. Sutter County also has several Organic Registered Producers that cover both intensive and extensive agriculture uses. See Figure 6.3-2 for the locations of Williamson Act lands within the county.

Type	Acres
Prime	52,028
Non-Prime	13,171
Unknown	48
Total	65,247
Source: Sutter County, August 2009; California Department of Conservation, Farmland Mapping & Monitoring Program, 2006, revised March 16, 2010.	

REGULATORY CONTEXT

Federal

There are no specific federal regulations that pertain to agricultural resources.

State

California Code of Regulations (Title 3. Food and Agriculture)

CCR Title 3, sections 6000-6920 regulate the registration, management, use, and application of pesticides on agricultural lands. These regulations are enforced by the Sutter County Agricultural Commissioner's office. Generally, specific regulations vary for each pesticide, its method of application and use. However, sections 6600 and 6614 of the CCR have some general regulations relating to the application of pesticides.

Section 6600 describes the standards of care that shall be used when applying pesticides. Standards include using equipment that is in good condition, performing pest control in a careful manner, properly applying pesticides, and exercising reasonable precautions to avoid contamination of the environment.

4 Ibid.

Section 6614 requires that non-target crops, animals, or public or private property shall not be damaged by pesticide application.

Food and Agriculture sections 3482.5 and 3482.6 of the California Civil Code protects the right-to-farm in California by stating that agricultural activity and operations are not considered a nuisance due to any changed condition in or about the locality, after it has been in continuous operation for more than three years if it was not a nuisance at the time it began. Section 3482.6 does not preclude a city, county, or other political subdivision of this state, acting within its constitutional or statutory authority and not in conflict with other provisions of state law, from adopting an ordinance that allows notification to a prospective homeowner that the dwelling is in close proximity to an agricultural processing activity, operation, facility, or appurtenances. Many jurisdictions that have active agricultural activities do adopt local right-to-farm ordinances.

Williamson Act

The California Land Conservation Act of 1965 (or Williamson Act) (California Government Code section 51200) recognizes the importance of agricultural land as an economic resource which is vital to the general welfare of society. The enacting legislation declares that the preservation of a maximum amount of the limited supply of agricultural land is necessary to the conservation of the state's economic resources, and is necessary not only to the maintenance of the agricultural economy of the state, but also for the assurance of adequate, healthful, and nutritious food for future residents of the state and the nation.

Intended to assist the long-term preservation of prime agricultural land in the state, Williamson Act contracts provide the agricultural landowner with a protection against property tax increases in exchange for keeping the land in agricultural use. When under contract, the landowner no longer pays property tax for an assessed valuation based upon the property's urban development potential. The Williamson Act stipulates that for properties under contract, "the highest and best use of such land during the life of the contract is for agricultural uses." Therefore, property under a contract is assessed and taxed based upon its agricultural value. Williamson Act contracts remain in effect for 10 years unless the property owner files for a notice of non-renewal with the County.⁵

The Williamson Act also addresses "compatible" uses. In section 51231, the Williamson Act states that "the board or council, by resolution, shall adopt rules governing the administration of agricultural preserves...Rules related to compatible uses shall be consistent with the provisions of section 51238.1." Section 51238.1 states the following:

5 California Department of Conservation, *Williamson Act Program - Basic Contract Provisions* <www.conservation.ca.gov/dlrp/lca/basic_contract_provisions/Pages/wa_overview.aspx>, accessed March 9, 2010.

- (a) Uses approved on contracted lands shall be consistent with all of the following principles of compatibility:
- (1) The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves.
 - (2) The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in agricultural preserves . . .
 - (3) The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use.

Local

Sutter County 2015 General Plan

The County's 2015 General Plan contains policies and implementation measures relevant to the preservation and protection of agricultural resources. The 2015 General Plan included policies focusing on preservation of agricultural land, minimum parcel sizes, home sites, economic development for agricultural industries, and agricultural preserves. Upon approval of the proposed General Plan, all policies and implementation measures in the 2015 General Plan would be superseded. Therefore, they are not included in this analysis.

Sutter County Ordinance Code, Chapter 1330

Chapter 1330, Agricultural Operations Disclosure, of the Sutter County Ordinance Code defines agricultural operation as the "cultivation and tillage of the soil, the production, irrigation, cultivation, growing, harvesting and processing of any agricultural commodity, including horticulture, timber, apiculture, the raising of livestock, fish, poultry, and commercial practices performed as incident to or in conjunction with such agricultural operation, including preparation for market, delivery to storage or market, or to carriers or transportation to market."⁶

The ordinance recognizes the importance of agricultural production in the county and acknowledges that residential development adjacent to agricultural land is likely to continue to occur. The purpose of this chapter is to: "promote the general health, safety and welfare of the county, and to preserve and protect for exclusive agricultural use those lands zoned for agricultural use, to support and encourage continued agricultural operations in the county, and to warn prospective purchasers and residents of property adjacent to agricultural operations of the inherent problems associated with such purchases including, but not limited to the sounds, odors, dust, smoke, fertilizers and pesticides that may accompany agricultural operations." Where a building designed for

⁶ Sutter County Ordinance Code, Chapter 1330, Agricultural Operations Disclosure, Sutter County, http://www.suttercounty.org/pdf/bos/ordinance/SCOC_Sect_1300.pdf, accessed April 16, 2010.

residential occupancy is to be located on or adjacent to agricultural land, the owners of the property shall sign, prior to the issuance of a building permit, a statement of acknowledgment on a form approved by the County which discloses the possible nuisances that agricultural operations may impose upon the property. The disclosure statement must be passed from seller to buyer.

Yuba-Sutter Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP)

Portions of the county are within the boundaries of the proposed Yuba-Sutter NCCP/HCP (Natural Community Conservation Plan/Habitat Conservation Plan). The Yuba-Sutter NCCP/HCP is a cooperative planning effort initiated by Yuba and Sutter counties in connection with improvements to Highways 99 and 70 and future development in the area surrounding those highways. Some species identified in and protected by the Yuba-Sutter NCCP/HCP rely on agricultural activities to sustain their populations. The Yuba-Sutter NCCP/HCP is still being developed. Until the NCCP/HCP is approved, there is no requirement for compliance. Figure 6.5-3 in Section 6.5, Biological Resources, shows the location of the Yuba-Sutter NCCP/HCP area. For a complete description of the Yuba-Sutter NCCP/HCP, please refer to page 4.1-22 of the TBR.

Natomas Basin Habitat Conservation Plan (NBHCP)

Portions of the county are within the boundaries of the Natomas Basin Habitat Conservation Plan (NBHCP). The NBHCP seeks "to promote biological conservation in conjunction with economic and urban development within the Permit Areas." Some species identified in and protected by the NBHCP rely on agricultural activities to sustain their populations. Figure 6.5-3 in Section 6.5, Biological Resources, shows the location of the NBHCP area. For a complete description of the NBHCP, please refer to pages 4.1-22 and 4.1-23 of the TBR.

IMPACTS AND MITIGATION MEASURES

Methods of Analysis

Potential project-specific and cumulative impacts to agricultural resources were determined based on information contained in a variety of sources, including the TBR, the FMMP, the NRCS Soil Survey, and Geographic Information Systems (GIS) data. A review of aerial maps was also undertaken in order to provide a more accurate description of designated farmland within the policy area. In addition, the proposed General Plan was analyzed in relation to existing state and local regulations and policies pertaining to agricultural resources and operations.

The impact analysis analyzes buildout of the proposed General Plan under full buildout conditions.

Proposed Sutter County General Plan Goals and Policies

The following goals and policies from the proposed General Plan relevant to agricultural resources within the entire policy area are listed below.

AGRICULTURAL RESOURCES ELEMENT (AG)

Agricultural Lands

Goal AG 1 Preserve and protect high quality agricultural lands for long-term agricultural production.

Policies

AG 1.1 **Agricultural Land Preservation.** Preserve and maintain agriculturally designated lands for agricultural use and direct urban/suburban and other nonagricultural related development to the cities, unincorporated rural communities, and other clearly defined and comprehensively planned development areas.

AG 1.2 **Minimum Parcel Sizes.** Establish minimum parcel sizes of 20, 40 and 80 acres on agriculturally designated lands to promote their long-term use for agriculture. Minimum agricultural parcel sizes shall be applied as follows:

- a. Apply the 20-acre minimum to those areas where a majority of existing parcels are less than 20 acres in size and the remaining parcels generally do not exceed 40 acres in size.
- b. Apply the 40-acre minimum to those areas where a majority of existing parcels are less than 40 acres in size and the remaining parcels generally do not exceed 80 acres in size.
- c. Apply the 80-acre minimum to all other agriculturally designated lands in the County.

Each agricultural land use category shall permit the full range of agricultural uses.

AG 1.3 **Land Use Boundaries.** Use parcel boundaries and sizes, roadways, natural barriers, soil types, and existing or historic agricultural uses and crop types to define logical boundaries between 20, 40, and 80 acre minimum agricultural land uses.

AG 1.4 **Multiple Land Use Designations.** Determine the minimum parcel size where multiple agricultural General Plan designations are shown on a single parcel of land based on such factors as soil characteristics contained in the USDA Soil Survey for Sutter County, existing and historic agricultural uses and crop types on the parcel, nearby parcel sizes, and the area of the parcel included within each land use designation.

AG 1.5 **Agricultural Land Conversion.** Discourage the conversion of agricultural land to other uses unless all of the following findings can be made:

- a. The net community benefit derived from conversion of the land outweighs the need to protect the land for long-term agricultural use;

- b. There are no feasible alternative locations for the proposed use that would appreciably reduce impacts upon agricultural lands; and
- c. The use will not have significant adverse effects, or can mitigate such effects, upon existing and future adjacent agricultural lands and operations.

AG 1.6 **Interrelationship with Habitat Conservation.** Permit agriculturally designated lands to be used for habitat conservation and/or mitigation with approval of a development agreement, provided such use does not interfere or adversely affect existing or planned agricultural uses or impact County flood control operations.

AG 1.7 **Residential Uses.** Limit residential uses on agriculturally designated land to residences needed to support agricultural farming operations, agricultural-related tourism, agricultural support services, and permitted residential homesites. Permanent residential densities shall be limited to those permitted by the underlying agricultural land use designation (1 residence per 20, 40, or 80 acres).

AG 1.8 **Homesites.** Allow a landowner to create a home site parcel on an agricultural parcel subject to the following:

- a. Only one home site parcel may be created for each legal parcel that existed as of (date of GPU approval).
- b. Home site parcels shall be the minimum size necessary to comply with Environmental Health and agricultural buffering requirements and shall not exceed 3 acres unless the County Environmental Health Division grants a waiver for sewage disposal, in which case a parcel of up to 5 acres may be allowed.
- c. The remaining agricultural parcel shall meet the minimum parcel size of the underlying agricultural land use designation (20, 40, or 80 acres).
- d. The landowner shall grant development rights for the remaining agricultural parcel to Sutter County or its designee. Residential densities shall be limited to those permitted by the underlying agricultural land use designation.
- e. Parcels that are non-conforming with the minimum parcel size required by the underlying agricultural land use designation may not apply for the creation of a home site parcel.
- f. Home site parcels may not be further subdivided.

AG 1.9 **Williamson Act.** Promote the use of the California Land Conservation Act (Williamson Act) on agricultural lands throughout the County provided the State continues to fund the subvention program to offset the loss of property taxes.

AG 1.10 **Transfer of Development Rights.** Explore, and if determined feasible, implement programs to permanently preserve agricultural lands through the use of voluntary transfer of development rights to guide development to more suitable areas.

AG 1.11 **Conservation Easements.** Explore, and if determined feasible, identify agricultural mitigation bank areas in which the County will encourage private landowners to voluntarily participate in agricultural conservation easements.

AG 1.12 **Land Mitigation Program.** Explore, and if determined feasible, create an Agricultural Land Mitigation Program.

AG 1.13 **Cooperation with Other Agencies.** Coordinate with the cities, the Local Agency Formation Commission (LAFCO), local service providers, and other relevant agencies on joint mechanisms to preserve agricultural lands and limit urban encroachment and the extension of urban service and infrastructure into agricultural areas.

Use & Operational Conflicts

Goal AG 2 Minimize conflicts between agricultural uses and operations and adjacent non-agricultural uses.

Policies

AG 2.1 **Minimize Conflicts.** Require that new development adjacent to agricultural areas be designed to minimize conflicts with adjacent agricultural uses and operations.

AG 2.2 **Right to Farm.** Affirm and protect the right of agricultural operators in agricultural areas to continue their agricultural practices (“right-to-farm”). The right-to-farm shall acknowledge through noticing that landowners and residents adjacent to agriculture should be prepared, accept, and not consider a nuisance the impacts inherent with lawful farming activities. At a minimum, the Right-to-Farm Notice shall be recorded with the Deed of Trust at the time of transfer of all applicable properties.

AG 2.3 **Buffers.** Protect agricultural operations from conflicts with non-agricultural uses by requiring buffers between proposed non-agricultural uses and adjacent agricultural operations:

- a. Buffers should be physically and biologically designed to avoid conflicts between agricultural and non-agricultural uses. The biological design should ensure that the buffer does not provide a host environment for pests or carriers of disease which could potentially impact adjacent farming operations.
- b. Buffers shall not be located on the agricultural parcel(s).
- c. Buffers should primarily consist of a physical separation (setback) between agricultural and non-agricultural uses. The appropriate width of the buffer shall be determined on a site-by-site basis taking into account the type of existing agricultural uses (i.e. crop type and associated operational requirements); the nature of the proposed non-agricultural development; the natural features of the site; landscaping, walls or other barriers planned by the proposed development; and any other factors that affect the specific situation.
- d. In addition to a physical separation, the following buffer options may be considered: greenbelts/open space, limited park and recreation areas, roads, PUE’s, waterways, and vegetative screens. These buffering options may be used in any combination to most effectively reduce conflicts arising from adjacent incompatible uses.

- e. An ongoing maintenance program for the buffer shall be established and should include vector controls.
- f. Buffer restrictions may be removed if all adjacent parcels have been irreversibly converted to non-agricultural uses.

AG 2.4 **Coordination with Cities.** Coordinate with the cities to encourage that new development in the cities mitigates impacts upon unincorporated agricultural uses and operations including the provision of right to farm notifications and buffering on city development projects.

Natural Resources for Agriculture (Sustainability)

Goal AG 3 Protect the natural resources needed to ensure that agriculture remains an essential and sustainable part of Sutter County's future.

Policies

AG 3.1 **Efficient Water Management.** Support the efficient management and use of agricultural water resources where economically feasible to support agriculture.

AG 3.2 **Water Conservation and Recycling.** Support the efforts of the multiple water agencies operating in Sutter County to adopt water conservation practices and explore the feasibility of water recycling for agriculture.

AG 3.3 **Water Quality and Quantity.** Support efforts to maintain water resource quality and quantity for the irrigation of productive farmland.

AG 3.4 **Water Competition from Urban Uses.** Oppose the loss of agricultural water due to competition from urban water consumption both within and outside the County.

AG 3.5 **Water Use Reduction.** Implement, as appropriate, reduction measures in the Climate Action Plan targeted to manage agricultural water use. Such measures may include encouraging agricultural water users to conserve water, and providing information on technologies that reduce agricultural water use.

AG 3.6 **Groundwater Resources.** Support the efforts of the local water agencies to promote groundwater recharge, conjunctive use, conservation of significant recharge areas, and other activities to protect and manage Sutter County's groundwater resources.

AG 3.7 **Alternative Energy.** Support the use of energy-saving technologies and alternative energy sources (solar, wind, biofuels) in all agricultural industries and operations such as the pumping of irrigation water, food processing, and water treatment. Support the use of alternative energy-powered farm vehicles and trucks.

AG 3.8 **Habitat Protection.** Promote wildlife friendly agricultural practices. Encourage habitat protection and management that is compatible with and does not preclude or restrict on-site agricultural production.

AG 3.9 **Chemical Use.** Support the efforts of growers to follow state and federal regulations concerning the use of pesticides, herbicides, and manufactured fertilizers.

AG 3.10 **Soil Management.** Implement, as appropriate, reduction measures in the Climate Action Plan targeted to promote soil management practices that reduce nitrogen dioxide emissions.

Agricultural Industries

Goal AG 4 Provide for growth, expansion, and diversification of Sutter County's agricultural industries.

Policies

AG 4.1 **Transportation Systems.** Maintain existing regional transportation systems to support the local, national, and global movement of agricultural products. Support the extension of freight rail into Sutter County's industrial areas.

AG 4.2 **Utility Infrastructure.** Implement mechanisms to provide the utility infrastructure, flood protection, and services necessary to lands designated for industrial use in order to support the growth and expansion of Sutter County's agriculture industries.

AG 4.3 **New Technologies.** Support the development and use of new technologies that facilitate resource efficient operation of agriculturally related industries, including food processing. These technologies may include: energy development technologies, such as wind, solar and waste sources; energy and water conservation technologies; cultivation practices; global positioning system (GPS) applications; and others that improve the profitability of agriculture in Sutter County.

AG 4.4 **Farmworker Housing.** Collaborate with incorporated cities, rural communities, the agricultural industry, and housing developers to provide affordable housing for farmworkers.

AG 4.5 **Agricultural Industries.** Promote the growth and expansion of existing agricultural industries as well as the development of new and diverse agricultural production, processing, and distribution industries within Sutter County.

AG 4.6 **Local Processing.** Support the local processing and distribution of agricultural products grown in Sutter County and other nearby locations.

AG 4.7 **Local Purchasing.** Promote Sutter County farmers' efforts to market their produce locally including the purchase and consumption of locally-grown and processed foods by local households, institutions, and businesses.

AG 4.8 **Market Expansion.** Support efforts to expand regional, national, and foreign markets for the export of local agricultural products.

AG 4.9 **Efficient Permit Processing.** Provide for commercial agricultural permit processing procedures that are expeditious and efficient. As appropriate, apply improvement standards and requirements, such as standards for parking and impermeable surfaces, which are reduced or minimized to reflect the nature of the agricultural operations.

AG 4.10 **Training and Support.** Support the efforts of the Agricultural Commissioner's office, the UC Small Farm Center, UC Cooperative Extension, the Small Business Development Centers, the Natural Resource Conservation Service (NRCS), the Resource Conservation District (RCD), and other agencies to provide technical assistance, research, employee training, and capital for emerging agricultural businesses.

AG 4.11 **One-Stop Center.** Support the creation and operation of a "one stop shop" agricultural resource business center housing multiple agricultural related agencies and businesses, including the Sutter County Agricultural Commissioner and County Farm Advisor/UC Cooperative Extension.

AG 4.12 **Support Uses.** Facilitate agricultural production by allowing agriculture related support uses, such as processing, storage, packaging, and soil preparation services, to be conveniently and accessibly located in agricultural production areas when related to the primary agricultural production in the area. Such uses shall be allowed by discretionary permit approval, subject to all of the following criteria:

- a. The use shall provide a service to the surrounding agricultural area which cannot be provided more efficiently within urban areas or which requires location in a non-urban area because of unusual site requirements or operation characteristics;
- b. The use should not be sited on productive agricultural land if less productive land is available in the immediate vicinity;
- c. The operational or physical characteristics of the use shall not have a significant adverse impact on water resources or the use or management of surrounding agricultural properties.

Visitor Services (Agri-tourism)

Goal AG 5 Promote visitor services and attractions to enhance and support Sutter County's agricultural industries.

Policies

AG 5.1 **Promotional Activities.** Encourage a wide variety of promotional and marketing activities that support Sutter County's unique agricultural heritage. These may include agricultural related festivals and farmers' markets.

AG 5.2 **Visitor Serving Uses.** Allow visitor-serving uses in agricultural designated areas through discretionary permit approval, subject to all of the following criteria:

- a. The use shall promote and market agricultural related products the majority of which should be grown or processed in the local area;
- b. The use is compatible with and secondary and incidental to agricultural production activities in the area;
- c. The use will not require the extension of municipal sewer or water services;
- d. The use is compatible with existing adjacent uses in the area; and
- e. The use is not a hotel, motel, resort or similar scale lodging, which is not permitted.

AG 5.3 **Marketing Coordination:** Collaborate with economic development organizations to increase the marketing of Sutter County and coordinate with neighboring jurisdictions to support a regional approach to agri-tourism.

AG 5.4 **Recreational Uses:** Support recreational uses on privately-owned lands where such uses are compatible with on and off-site agriculture and with scenic and environmentally sensitive resources.

AG 5.5 **Special Events:** Allow for farm home-stays, bed and breakfasts, and special events such as weddings in agricultural areas, subject to discretionary permit approval.

AG 5.6 **Agricultural Organizations:** Promote events sponsored by organizations such as school districts, colleges, UC Cooperative Extension, UC Small Farm Center, the Agricultural Commissioner, 4-H, the Farm Bureau, or other programs which expose the public to agricultural activities and issues.

Implementation Programs

AG 1-A Complete a comprehensive review of the Sutter County Zoning Code and amend as appropriate to include provisions for: minimum agricultural parcel sizes; right to farm; properties with multiple use designations; agricultural land conversion; interrelationship with habitat conservation; residential uses on agricultural land; homesites; conflicts with adjacent uses; buffers; efficient permit processing; agricultural support uses; promotional activities including agricultural related festivals and farmers' markets; visitor serving and recreational uses on agricultural lands; and special events including farm home-stays, bed and breakfasts, and special events such as weddings in agricultural areas, subject to discretionary permit approval.

AG 1-B Conduct a study to determine the feasibility of implementing agricultural land preservation programs such as transfer of development rights, conservation easements, and agricultural land mitigation.

AG 1-C Work with the cities and other appropriate agencies and interests to establish a standing committee or other mechanism to coordinate on agricultural related issues in Sutter County. Issues that may be addressed by the committee include, but are not limited to, exploring the feasibility of joint mechanisms to preserve agricultural land including implementation of AG 1-B; limiting urban development in agricultural areas; mitigating impacts on agricultural land and uses; minimizing

conflicts between new development and existing agricultural operations including right to farm ordinances and buffers between urban and agricultural uses; the provision of farmworker housing; and the promotion of food processing facilities and other agricultural related industries.

AG 2-A Amend the County's existing Right to Farm Ordinance to require more effective disclosure of the rights of lawful farming activities.

AG 4-A Work with the cities and other appropriate agencies and interests to establish a marketing committee to promote Sutter County agriculture through the following and other means: agricultural industry promotional activities, including farmers' markets; agri-tourism marketing; marketing of locally-grown food; and promotion of events that expose residents of urban places to agricultural activities and issues.

LAND USE ELEMENT (LU)

Countywide Land Use

Goal LU-1 Promote the efficient and sensitive use of lands to protect and enhance Sutter County's quality of life and meet the needs of existing and future residents and businesses.

Policies

LU 1.5 **Minimize Land Use Conflicts.** Avoid/minimize conflicts between land uses and ensure that new development maintains the viability of adjacent agricultural, open space, and rural uses and minimizes impacts upon existing residents, businesses, and resources.

LU 1.6 **Buffers.** Require new development adjacent to agricultural and open space lands to provide buffers and incorporate mitigation to minimize impacts as appropriate. Agricultural buffers shall be in accordance with the Sutter County Design Guidelines and project environmental review.

Agriculture and Open Space

Goal LU 2 Preserve Sutter County's agricultural heritage and natural resources.

Policies

LU 2.1 **Long-term Conservation.** Promote the long-term conservation of agricultural and open space lands in accordance with the goals and policies of the Agricultural Resources and Environmental Resources elements.

Implementation Programs

LU 1-B Complete a comprehensive review of the Sutter County Design Guidelines and amend as appropriate to:

- Minimize land use conflicts between uses;
- Define Agricultural buffers;
- Define Industrial and Commercial buffers;

- Incorporate Landscape Design measures from the Climate Action Plan;
- Discourage strip development along key roadways and highways;
- Enhance the design of development located along roadways and highways to protect quality views;
- Ensure compatible new development in agricultural areas;
- Preserve and protect local landmarks and significant natural resources within rural communities;
- Define appropriate design standards to enhance rural communities;
- Define gateways to rural communities;
- Require high quality, efficient, and well designed new development;
- Promote well defined, diverse and distinct residential neighborhoods and housing;
- Address street frontages, pedestrian access, compatibility with surrounding uses, architectural design, scale and massing, screening, sign design, transit facilities, visual impact of parking areas, and shared access and parking or new commercial and industrial uses;
- Ensure compatible design of public facilities; and,
- Establish Industrial Commercial and Employment Corridor buffers.

LU 1-C Complete a comprehensive review of the Sutter County Zoning Code and amend as appropriate to:

- Prohibit new Agriculture Rural Community and Ranchette zoning and uses;
- Allow for the Commercial Recreation Overlay;
- Limit new Estate Residential development;
- Allow mixed use developments including employee-serving businesses within industrial areas;
- Allow for the development of second residential units in appropriate zones;
- Provide for consistent signage and flexible development standards for new commercial and industrial uses;
- Provide for expedited Design Review processing within the Employment Corridor;
- Make necessary changes to ensure consistency between the Sutter County Zoning Code and the General Plan.

Standards of Significance

For the purposes of this EIR, impacts to agricultural resources are considered significant if the proposed General Plan would:

- convert Important Farmland (i.e., 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 nonagricultural use;
- conflict with existing zoning for agricultural use or a Williamson Act contract; or
- involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland to nonagricultural use.

Impacts and Mitigation Measures

6.3-1 Implementation of the proposed General Plan would convert Important Farmland to nonagricultural uses.

According to the most recent information available from the 2006 FMMP, the county contains approximately 290,193 acres of Important Farmland. This total includes 165,165 acres of Prime Farmland, 105,979 acres of Farmland of Statewide Importance, and 19,049 acres of Unique Farmland, as shown on Figure 6.3-2. Implementation of the proposed General Plan would result in the conversion of some of these agricultural lands to urban uses.

Future development in the county would be focused around existing developed areas and concentrated in the identified Growth Areas; however, the loss of Important Farmlands would still occur. Assuming development of the maximum holding capacity of the land or the full buildout scenario, the proposed General Plan would result in a direct loss of Important Farmland by converting approximately 2,960 acres of Prime Farmland and 6,666 acres of Farmland of Statewide Importance to developed uses. This would be a loss of approximately 3.3 percent of the Important Farmland currently in the county.

Once agricultural lands have been converted to non-agricultural use, they are generally removed from agricultural productivity and regarded as permanently converted farmland. However, several General Plan policies would help protect agricultural lands in the county. Specifically, policy AG 1.1 seeks to preserve and maintain agriculturally designated lands for agricultural use and direct urban/suburban and other nonagricultural related development to the cities, unincorporated rural communities, and other clearly defined and comprehensively planned development areas. Policy AG 1.2 establishes minimum parcel sizes of 20, 40 and 80 acres on agriculturally designated lands to promote their long-term use for agriculture. Policy AG 1.5 would discourage the conversion of agricultural land to other uses unless all of the following findings can be made: (1) the net community benefit

derived from conversion of the land outweighs the need to protect the land for long-term agricultural use; (2) there are no feasible alternative locations for the proposed use that would appreciably reduce impacts upon agricultural lands; and (3) the use will not have significant adverse effects, or can mitigate such effects, upon existing and future adjacent agricultural lands and operations. Implementation of these policies would ensure that urban and suburban development is focused in specific areas, preventing urban sprawl from further converting agricultural uses to urban uses.

Goal AG 3 seeks to protect the natural resources needed to ensure that agriculture remains an essential and sustainable part of Sutter County's future while Goal AG 4 provides for growth, expansion, and diversification of Sutter County's agricultural industries.

Through the implementation of proposed General Plan goals and policies and compliance with existing County Ordinances, agricultural land and operations would be preserved to the maximum extent possible. Although the agricultural conversion that would result from the implementation of the General Plan would convert approximately 3.3 percent, or 9,626 acres, of Important Farmlands to non-agricultural uses and conversion would be focused around existing urban centers in growth areas, the conversion of Important Farmland to non-agricultural uses is irreversible and would be considered a *significant and unavoidable impact*.

Mitigation Measure

There are no feasible mitigation measures that would ensure the loss of Important Farmland would not occur with implementation of the General Plan.

None available.

6.3-2 Implementation of the proposed General Plan could conflict with existing zoning for agricultural use or with a Williamson Act contract.

As of March 2010, there were 65,247 acres in Sutter County protected as agricultural land under the Williamson Act. Approximately 20 percent of the agricultural land within the county is currently under a Williamson Act contract. Williamson Act lands are located throughout the county, as shown on Figure 6.3-2. Due to the location of the existing Williamson Act lands compared to the areas designated for development under the General Plan, implementation of the General Plan would potentially result in a minimal conversion of land under a Williamson Act contract assuming the full buildout scenario. However, if development were to occur on land protected under a Williamson Act contract, property owners must initiate cancellation of the contract or elect not to renew their Williamson Act contracts.

Policy AG 1.9 promotes the use of Williamson Act contracts on agricultural lands throughout the county provided the State continues to fund the subvention program to offset the loss of property taxes. If the State were to discontinue the Williamson Act subsidy program, it is possible that fewer property owners would elect to enter into long-term non-development agreements.

Williamson Act lands would also be protected from urban encroachment through the use of physical buffers between agricultural uses and non-agricultural uses. Specifically, policy AG 2.1 seeks to minimize conflicts between urban and agricultural uses by requiring that new development proposed adjacent to agricultural areas be designed to minimize conflicts with adjacent agricultural uses and operations. Policy AG 2.2 affirms and protects the right of agricultural operators in agricultural areas to continue their agricultural practices ("right-to-farm"). In addition, Sutter County Ordinance Code, Chapter 1330 acknowledges through noticing that landowners and residents adjacent to agriculture should be prepared, accept, and not consider a nuisance the impacts inherent with lawful farming activities. At a minimum, the Right-to-Farm Notice shall be recorded with the Deed of Trust at the time of transfer of all applicable properties. In addition, policy AG 2.3 protects agricultural operations from conflicts with non-agricultural uses by requiring physical buffers between proposed non-agricultural uses and adjacent agricultural operations. Implementation of these proposed policies would ensure that land under Williamson Act contracts in the county would be encouraged to continue agricultural operations and that potential conflicts with adjacent uses would be minimized.

As discussed above, the proposed General Plan designates only a very small amount of Williamson Act lands to non-agricultural uses. The potential conversion of this land would be insignificant compared to the 65,247 acres of Williamson Act lands that are designated to remain agricultural. In addition, implementation of proposed General Plan policies would seek to further protect Williamson Act lands and other agricultural lands and encourage additional lands be placed Williamson Act contracts in the county. As a result, the impact would be *less than significant*.

Mitigation Measure

None required.

6.3-3 Implementation of the proposed General Plan would locate urban land uses adjacent to existing agricultural lands, which could result in land use compatibility conflicts, and potentially result in the ultimate conversion of land to nonagricultural land uses.

Development in the county would be focused around existing developed areas and concentrated in specified Growth Areas. Despite the policies put forth by the General Plan to preserve agricultural land and limit the unnecessary conversion of agricultural land, it is

likely that urban uses would be developed directly adjacent to active agricultural lands. Adjacency issues assumed full buildout conditions. Policy AG 2.1 seeks to minimize conflicts between urban and agricultural uses by requiring new development adjacent to agricultural areas be designed to minimize conflicts with adjacent agricultural uses and operations. Policy AG 2.2 affirms and protects the right of agricultural operators in agricultural areas to continue their agricultural practices (“right-to-farm”). In addition, Sutter County Ordinance Code, Chapter 1330 acknowledges through noticing that landowners and residents adjacent to agricultural uses should be prepared, accept, and not consider a nuisance the impacts inherent with lawful farming activities. At a minimum, the Right-to-Farm Notice shall be recorded with the Deed of Trust at the time of transfer of all applicable properties. In addition, Policy AG 2.3 protects agricultural operations from conflicts with non-agricultural uses by requiring physical buffers between proposed non-agricultural uses and adjacent agricultural operations.

Although development of non-agricultural uses would occur adjacent to active agricultural uses, the use of physical buffers coupled with the County’s right-to-farm ordinance would minimize conflicts between the uses. The General Plan’s focus on developing non-agricultural uses near existing urbanized areas and within designated Growth Areas would minimize the potential for additional conversion of agricultural lands to non-agricultural uses. Therefore, the impact would be *less than significant*.

Mitigation Measure

None required.

Growth Areas

Rural Planned Communities

Sutter

There are currently 2,097 acres of land designated for agricultural uses within the community of Sutter. There are existing Williamson Act contracts to the south and east of Sutter, but no Williamson Act lands are designated for development under the proposed General Plan. The General Plan designates approximately 397 acres of agricultural land to non-agricultural uses within the community of Sutter. The primary non-agricultural uses that would be developed are low density residential and industrial. The current AG-20 designation would be removed and largely replaced by the AG-40 designation (which permits limited development). Although development of agricultural lands would occur, the proposed General Plan encourages the preservation of agricultural lands within a majority of the county. Future development within this area would still be required to minimize potential conflicts through compliance with the County’s right-to-farm ordinance, addition of physical buffers between active agricultural lands and urban development, and

the preservation of agricultural land outside the prescribed Rural Planned Community boundary. Impacts to agricultural resources in the community of Sutter would be the same as the remainder of the county, as discussed above.

East Nicolaus/Trowbridge

The Rural Planned Community of East Nicolaus/Trowbridge currently has 1,484 acres of land designated for agricultural uses. There are no Williamson Act lands near East Nicolaus or Trowbridge. Under the proposed General Plan, 18 acres of land currently designated for agricultural uses would be converted to non-agricultural uses. The current AG-20 designation would be removed completely and replaced with AG-80 and AG-RC or developed to a non-agricultural use. As described above, although development of agricultural lands would occur, the General Plan promotes preservation of agricultural lands outside of the East Nicolaus/Trowbridge Rural Planned Community. In addition, to protect existing agricultural operations, the County's right-to-farm ordinance would still be in effect, physical buffers would be required between active agricultural lands and urban development to reduce or avoid conflicts, and agricultural land outside the prescribed Rural Planned Community boundary would be preserved. Still, the conversion of agricultural lands to non-agricultural uses is a significant impact. The impact in East Nicolaus/Trowbridge would be the same as the remainder of the county.

Spheres of Influence

Yuba City – North and South

In the northern portion of the Yuba City SOI, 496 acres of land designated as AG-20 would be redesignated to I/CR, a non-agricultural use. Within the southern portion of the SOI, 481 acres of land designated for agricultural uses would be designated for ER, LDR, COM, and IND. Development in these areas is proposed due to its proximity to Highway 99, which is a logical location for new industrial or commercial uses. Growth in these areas would be coordinated with the city of Yuba City since the land is within the City's SOI. However, adherence to the County's proposed General Plan goals and policies would prevent unnecessary development of other agricultural lands, create physical boundaries between active agricultural uses and non-agricultural uses, and keep the County's right-to-farm ordinance in effect. The impact in the Yuba City SOI area would be the same as the remainder of the county.

Sutter Pointe Specific Plan Area

As discussed in the Sutter Point Specific Plan (SPSP) EIR, 7,305 acres of agricultural land would be developed as non-agricultural uses. The SPSP EIR determined that conversion of this land to a non-agricultural use was a significant impact and that the establishment of conservation easements consistent with the Natomas Basin Habitat Conservation Plan was

appropriate mitigation. In addition, physical buffers between agricultural and non-agricultural uses would be required. Since the loss of this agricultural land was already evaluated and mitigated for in the SPSP EIR, no further action would be necessary.

Industrial/Commercial (I/C)

Under the proposed General Plan, 331 acres of I/C land is proposed, primarily located on land currently designated for agriculture. The development of this land has been evaluated above and impacts to agricultural resources in these areas would be the same as the remainder of the county.

Employment Corridor (EC)

Under the proposed General Plan, 1,065 acres of EC land would be designated, primarily located on land designated for agriculture. The development of this land has been evaluated above and impacts to agricultural resources in these areas would be the same as the remainder of the county.

Cumulative Impacts and Mitigation Measures

Land designated as agriculture (AG-20, AG-80, AG/APR, or RAN) in the county currently accounts for approximately 90 percent of Sutter County's 378,875-acre total land area. In 1996, there were 306,864 acres of Important Farmland (Prime, Unique, Statewide Importance, and Local Importance) in Sutter County.⁷ By 2006, the acreage had dropped to 292,256 over the 10-year period.⁸ By 2010, there were 290,193 acres of Important Farmland in the county.⁹

The geographic context for the assessment of cumulative impacts to agricultural resources would be future development in the county as well as within its surrounding counties: Butte, Colusa, Sacramento, Placer, Yolo, and Yuba. As shown in Table 6.3-3, there were a total of 2,525,027 acres in agriculture in these six counties in 2006.

Agricultural conflicts with surrounding urban land uses would be the same under cumulative conditions as described in Impact 6.3-3. Impact 6.3-3 discusses full build-out of the General Plan and no further discussion is necessary.

6.3-4 Implementation of the proposed General Plan, in combination with other development in the region could convert Important Farmland to nonagricultural uses.

7 Sutter County, Sutter Pointe Specific Plan Draft EIR, SCH #2007032157, prepared by EDAW, p. 5-25, December 2008.

8 Ibid.

9 Sutter County, August 2009; California Department of Conservation, Farmland Mapping & Monitoring Program, 2006 updated March 16, 2010.

There are several development projects either recently approved or proposed in surrounding counties, many of which have the potential to convert agricultural lands to non-agricultural uses. Once lands are converted to a non-agricultural use, the land cannot revert to agricultural production and the conversion becomes permanent. Several nearby planned or approved developments, including large developments in Sacramento and Placer counties, have converted or have been approved to convert predominantly

County	Acres in Agriculture (including Grazing)	Total Acres in County	Percent of County in Agriculture
Butte	649,736	1,073,254	61
Colusa	567,621	740,392	77
Placer	166,876	411,532	41
Sacramento	372,090	636,085	58
Yolo	540,591	653,453	83
Yuba	228,113	411,817	55
Total	2,525,027	3,926,533	64
<small>Source: California Department of Conservation website, Division of Land Resource Protection, California Farmland Conversion Report, 2004-2006, December 2008, www.conservation.ca.gov/dlrp/fmmp/Pubs/2004-2006/Pages/FMMP_2004-2006_FRC.aspx, accessed May 2, 2010.</small>			

agriculture areas to an urban setting. The cumulative loss of agricultural lands within Butte, Colusa, Placer, Sacramento, Sutter, Yolo, and Yuba counties is *significant*.

As stated above, under the proposed General Plan approximately 3.3 percent, or 9,626 acres, of Sutter County's Important Farmland could be lost due to future development assuming full buildout conditions. Implementation of policy AG 1.1 would preserve and maintain agriculturally designated lands for agricultural use and direct urban/suburban and other nonagricultural related development to the cities, unincorporated rural communities, and other clearly defined and comprehensively planned development areas. Policy AG 1.2 establishes minimum parcel sizes of 20, 40 and 80 acres on agriculturally designated lands to promote their long-term use for agriculture. Policy AG 1.5 would discourage the conversion of agricultural land to other uses unless all of the following findings can be made: (1) the net community benefit derived from conversion of the land outweighs the need to protect the land for long-term agricultural use; (2) there are no feasible alternative locations for the proposed use that would appreciably reduce impacts upon agricultural lands; and (3) the use will not have significant adverse effects, or can mitigate such effects, upon existing and future adjacent agricultural lands and operations. Implementation of these policies would ensure that urban and suburban development is focused in specific areas, preventing urban sprawl from further converting agricultural uses to urban uses.

However, because no new agricultural land would be made available and the productivity of existing agricultural land would not be improved as a result of the General Plan, full compensation for the loss of Important Farmland would not be achieved and a net loss of Important Farmland would still occur. Therefore, the loss of Important Farmland associated with buildout of the General Plan would be considerable and would result in a cumulatively significant contribution to this impact.

The cumulative loss of Important Farmland is identified as a significant impact. Implementation of the proposed General Plan goals and policies described above would substantially lessen significant impacts associated with the conversion of farmland; however, full compensation for the loss of this land would not be achieved and a net loss of Important Farmland would still occur. Therefore, the project's contribution to the cumulative loss of Important Farmland would remain *significant and unavoidable*.

Mitigation Measure

None available.