

4.11 AGRICULTURAL RESOURCES

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This section of the Draft Environmental Impact Report (Draft EIR) for the proposal Mitchell Ranch Center project describes the agricultural resources in the area and the policies pertaining to these resources. Sources used to assess impacts of the proposed project include the City of Ceres General Plan, the City of Ceres General Plan Final EIR, the Agricultural Element of the Stanislaus County General Plan, California Department of Conservation Farmland Conversion Reports, Farmland Mapping and Monitoring Program maps, and the Stanislaus County Soil Survey.

No comments related to agricultural resources were received following publication of the Notice of Preparation/Initial Study (NOP/IS) for the proposed project.

4.11.1 ENVIRONMENTAL SETTING

FARMLAND CLASSIFICATIONS

The two systems used by the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), formerly the Soil Conservation Service, to determine a soil's agricultural productivity include the Soil Capability Classification System and the Storie Index Rating System. The "prime" soil classifications of both systems indicate the absence of soil limitations, which if present, would require the application of management techniques (e.g., drainage, leveling, special fertilizing practices) to enhance production.

SOIL CAPABILITY CLASSIFICATION

The Soil Capability Classification System takes into consideration soil limitations, the risk of damage when the soils are used, and the way in which soils respond to treatment. Capability classes range from Class I soils, which have few limitations for agriculture, to Class VIII soils, which are unsuitable for agriculture. Generally, as the ratings of the capability classification system increase, the yields and profits are more difficult to obtain. A general description of soil classification, as defined by the NRCS, is provided in **Table 4.11-1**.

TABLE 4.11- 1
NRCS SOIL CAPABILITY CLASSIFICATIONS

Class	Definition
I	Soils have few limitations that restrict their use.
II	Soils have moderate limitations that reduce the choice of plants, or that require special conservation practices.
III	Soils have severe limitations that reduce the choice of plants, require conservation practices, or both.
IV	Soils have very severe limitations that reduce the choice of plants, require very careful management, or both.
V	Soils are not likely to erode but have other limitations; impractical to remove that limit their use largely to pasture or range, woodland, or wildlife habitat.
VI	Soils have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture, or range, woodland, or wildlife habitat.
VII	Soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife habitat.
VIII	Soils and landforms have limitation that preclude their use for commercial plant production and restrict their use to recreation, wildlife habitat, or water supply, or to aesthetic purposes.

Source: NRCS, 2007

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STORIE INDEX RATING SYSTEM

The Storie Index Rating System ranks soil characteristics according to their suitability for agriculture from Grade 1 soils (80 to 100 rating), which have few or no limitations for agricultural production, to Grade 6 soils (less than 10 rating), 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. The six grades, ranges in index rating, and definition of the grades, as defined by the NRCS, are provided below in **Table 4.11-2**.

TABLE 4.11- 2
NRCS STORIE INDEX RATING SYSTEM

Grade	Index Rating	Definition
1 – Excellent	80 through 100	Soils are well suited
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 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: NRCS, 2007

FARMLAND MAPPING AND MONITORING PROGRAM

The Farmland Mapping and Monitoring Program (FMMP) was established in the California Department of Conservation (DOC) in 1982 to continue the Important Farmland mapping efforts begun in 1975 by the USDA, which were intended to produce agricultural resource maps based on soil quality and land use across the nation. As part of the nationwide agricultural land use mapping effort, the NRCS developed a series of definitions known as Land Inventory and Monitoring (LIM) criteria. The LIM criteria classified the land's suitability for agricultural production; suitability included both the physical and chemical characteristics of soils and the actual land use. Important Farmland Maps are derived from the soil survey maps using the LIM criteria.

Since 1980, the State of California has assisted the NRCS with completing its mapping in the state. The DOC applied a greater level of detail by modifying the LIM criteria for use in California. The LIM criteria in California utilize the Soil Capability Classification and Storie Index Rating systems, but also consider physical conditions such as a dependable water supply for agricultural production, soil temperature range, depth of the groundwater table, flooding potential, rock fragment content, and rooting depth.

Important Farmland Maps for California are compiled using the modified LIM criteria, as described above, and current land use information. The minimum mapping unit is 10 acres unless otherwise specified. Units of land smaller than 10 acres are incorporated into the surrounding classification. The Important Farmland Maps identify five agriculture-related categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Each is summarized below, based on *A Guide to the Farmland Mapping and Monitoring Program* (DOC, 1994a), prepared by the DOC.

Prime Farmland

Prime Farmland is land with the best combination of physical and chemical features able to sustain the long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been producing irrigated crops at some time during the two updated cycles (a cycle is equivalent to two years) prior to the mapping date.

Farmland of Statewide Importance

Farmland of Statewide Importance is land similar to prime farmland, but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date.

Unique Farmland

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

Farmland of Local Importance

Farmland of Local Importance is land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee. Farmland of Local Importance in Stanislaus County includes lands which do not qualify as Prime, Statewide, or Unique Farmland, but are currently used for growing dryland pasture, dryland small grains, and irrigated pasture (DOC, 2004a).

Grazing Land

Grazing Land is land on which the existing vegetation, whether grown naturally or through management, is suited to the grazing of livestock. The minimum mapping unit for this category is 40 acres.

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Urban and Built-Up Land

Urban and Built-up Land is land occupied with structures with a building density of at least one unit to one-half acre. Uses may include, but are not limited to, residential, industrial, commercial, construction, institutional, public administration purposes, railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. Highways, railroads, and other transportation facilities are mapped as part of this unit, if they are part of a surrounding urban area.

Other Land

Other Land is land that is not included in any other mapping categories. The following uses are generally included: rural development, brush, timber, government land, strip mines, borrow pits, and a variety of other rural land uses.

CONTRIBUTION OF AGRICULTURE TO THE STANISLAUS COUNTY ECONOMY

Stanislaus County ranked sixth in total value of production out of 58 counties in the state, with gross revenues from the sales of agricultural commodities of \$1.2 billion in 2002. The county's leading commodities include market milk, almonds, chickens, fruit/vine/nut nursery crops, and English walnuts (USDA, 2002). The county's farming industry employed an estimated 14,000 individuals in 2002 (EDD, 2002).

STANISLAUS COUNTY 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 productive agricultural areas. The conversion of Important Farmlands to nonagricultural use in Stanislaus County from 1992 to 2004 is presented in **Table 4.11-3**.

**TABLE 4.11-3
IMPORTANT FARMLAND INVENTORY AND CONVERSION ESTIMATES –
STANISLAUS COUNTY (1992 TO 2004)**

Year	Acres Present by Type				
	Prime Farmland	Farmland of Statewide Importance	Unique Farmland	Farmland of Local Importance	Total Important Farmlands
1992	171,500	27,731	47,459	40,345	287,035
1994	170,974	28,101	48,727	38,847	286,649
1996	170,048	27,832	49,042	38,140	285,062
1998	166,558	27,398	48,994	37,650	280,600
2000 ¹	264,121	30,715	59,850	31,848	386,534
2002	260,372	30,073	61,556	29,537	381,538
2004	256,525	29,788	63,267	26,453	376,033
13-Year Difference	+85,025	+2,057	+15,808	-13,892	+88,998

Year	Acres Present by Type				
	Prime Farmland	Farmland of Statewide Importance	Unique Farmland	Farmland of Local Importance	Total Important Farmlands
13 Year Percentage Difference	+49.6%	+7.4%	+33.3%	-34.4%	+31.0%
Annual Average Difference	+6,540	+158	+1,216	-1,069	+6,846

Source: California Department of Conservation, Stanislaus County Farmland Conversion Reports 1992 to 1994, 1994 to 1996, 1996 to 1998, 1998 to 2000, 2000 to 2002, and 2002 to 2004.

1 Acreage counts were revised during 2000 due to the incorporation of digital soil survey data (SSURGO)

During the past 13 years, Stanislaus County has experienced an overall increase in the acreage of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. However, much of this increase can be attributed to the incorporation of digital soil survey data by the Department Conservation in the 2000–2002 estimates. Aside from this revision in 2000 to incorporate digital soil survey data, the county has seen a steady decline each year in all categories but Unique Farmland. Nevertheless, as presented in **Table 4.11-3**, the total amount of Important Farmland in the county has increased approximately 31 percent during the 13-year period from 1992 to 2004.

PROJECT SITE CHARACTERISTICS

Project Site Demolitions

The California Environmental Quality Act (CEQA) requires an EIR to include a description of the physical environmental conditions (baseline) in the vicinity of the project site as they exist at the time the Notice of Preparation (NOP) is published. The Mitchell Ranch Project NOP was published September 5, 2007. At that time, the project site contained four abandoned residential units which were planned for demolition prior to project construction. After field evaluations of the site were completed, the City of Ceres issued demolition permits (Permit Nos. BLD07 0924, 0927, 0928, and 0929) for the removal of three of the four structures on the project site; additionally, some vegetation was removed. Apart from the remaining structure, the rest of the site is undeveloped.

Production and Soil Conditions

Currently, no agricultural production occurs on the site. However in the past, portions of the site have been used for various types of crop production including row crops (SECOR, 2006).

Soils on the project site consist of Hanford sandy loam, moderately deep over silt (0 to 1 percent slopes) and Hanford sandy loam (0 to 3 percent slopes) (NRCS, 2007). The soils capability classification, Storie Index Rating and grade, and Important Farmland classifications are presented for these soils in **Table 4.11-4**.

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TABLE 4.11- 4
PROJECT SITE SOIL RATINGS AND IMPORTANT FARMLAND CLASSIFICATIONS

Soil Map Symbol and Name	Soil Capability Classification	Storie Index Grade	Important Farmland Classification
HdpA – Hanford sandy loam, moderately deep over silt, 0 to 1 percent slopes	2s (irrigated) 4s (nonirrigated)	1	Prime Farmland
HdA – Hanford sandy loam, 0 to 3 percent slopes	1 (irrigated) 4c (nonirrigated)	1	Prime Farmland

Source: NRCS, 2007

Although the soils of the project site have the qualities appropriate for Prime Farmland, the western portion of the project site has been classified by the FMMP as Vacant or Disturbed Land as it has been partially developed for residential uses (see **Figure 4.11-1**). The eastern portion of the site, approximately 16.7 acres, is classified as Prime Farmland.

Surrounding Land Characteristics

The project site is largely surrounded by developed parcels or vacant parcels planned for development in the near term (City of Ceres, 1997). There is no land under agricultural production, zoned for agricultural use, or subject to a Williamson Act contract in the immediate vicinity of the project site. Approximately 16.7 acres of the project site, the eastern portion) is classified by the FMMP as Prime Farmland. Additionally, there is land classified as Prime Farmland located southwest of the project site on the west side of State Route 99 (SR 99) and east of the project site, east of Moore Road (see **Figure 4.11-1**) (DOC, 2004b; DOC, 2006).

4.11.2 REGULATORY FRAMEWORK

STATE

Williamson Act

The California Land Conservation Act, also known as the Williamson Act, was adopted in 1965 in order to encourage the preservation of the state's agricultural lands and to prevent their premature conversion to urban uses. In order to preserve these uses, the act established an agricultural preserve contract procedure by which any county or city within the state taxes landowners at a lower rate, using a scale based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. In return, the owners guarantee that these properties remain under agricultural production for a ten-year period.

The contract is renewed automatically unless the owner files a notice of non-renewal. In this manner, each agricultural preserve contract (at any given date) is always operable at least nine years into the future. Currently, approximately 70 percent of the state's prime agricultural land is protected under this act. Prime farmland under the Williamson Act includes land that qualifies as Class I and II in the Soil Capability Classification System and land that qualifies for rating 80 to 100 in the Storie Index Rating. No lands within the project vicinity are under Williamson Act contract.

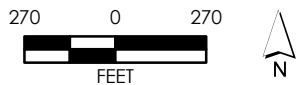
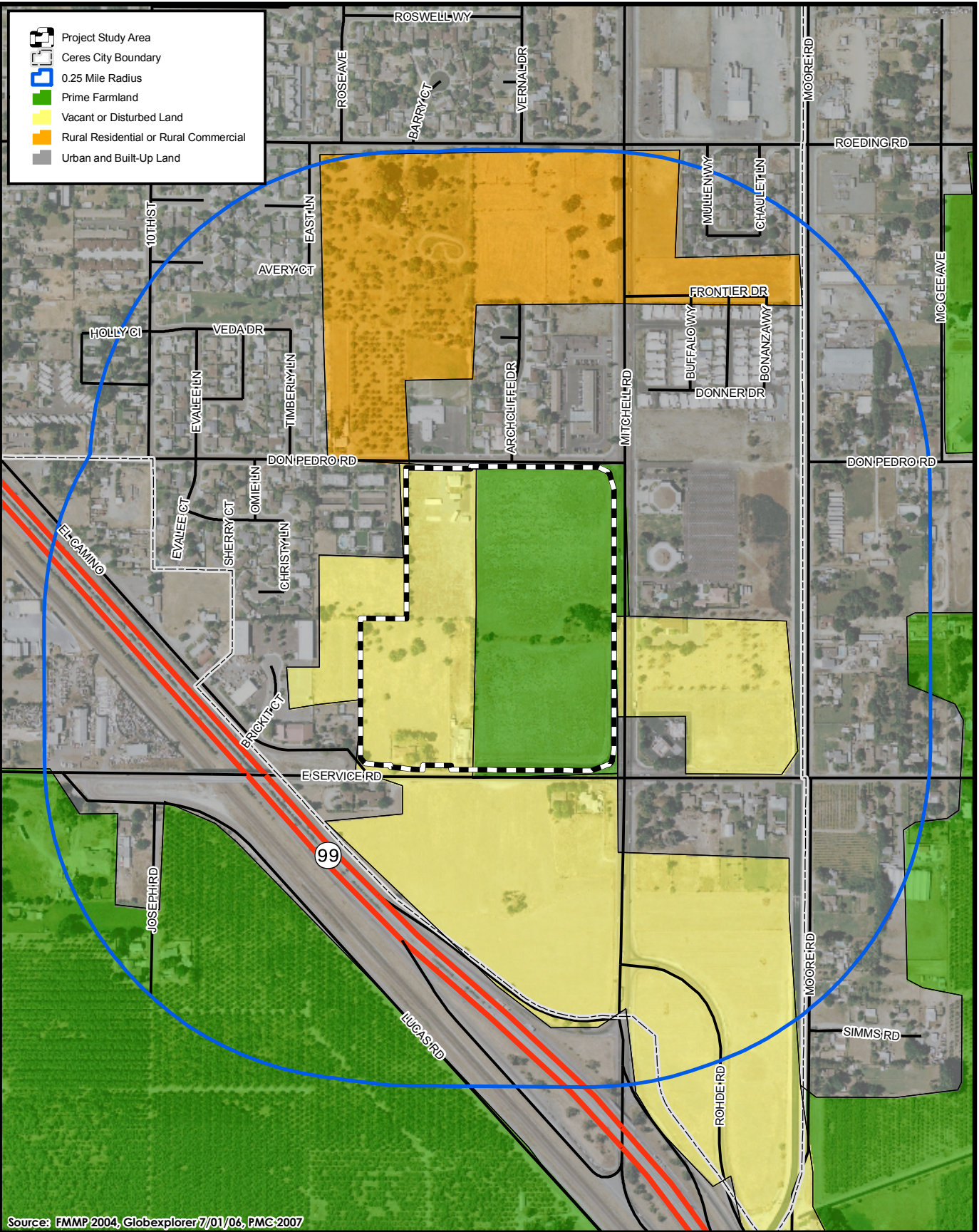


Figure 4.11-1
FMMP Map



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LOCAL

Stanislaus County Right-to-Farm Ordinance

Stanislaus County is one of 19 counties in California to have enacted a local right-to-farm ordinance to protect farmers from nuisance suits as a result of normal farming practices. In 1991 the County strengthened its original right-to-farm ordinance by amending it to require disclosure to homebuyers in farming areas that they are subject to noise, dust, odors, and other impacts of commercial agricultural operations. The County also established a notification system to make residents more aware of the right-to-farm policy and established a voluntary agricultural grievance procedure as an alternative to court proceedings (Stanislaus County, 1992).

City of Ceres General Plan

The City of Ceres General Plan serves as the overall guiding policy document for land use, development, and environmental quality for the City. The Agricultural and Natural Resources Element of the General Plan provides goals, policies, and implementation programs that establish the framework for the protection of agricultural resources. **Table 4.11-5** analyzes the project’s consistency with applicable City of Ceres General Plan Agricultural and Natural Resources Element policies. While this Draft EIR analyzes the consistency of the proposed Mitchell Ranch Center project with the City of Ceres General Plan pursuant to CEQA Guidelines Section 15125(d), the City of Ceres will ultimately make the determination of the project’s consistency with the General Plan.

**TABLE 4.11-5
PROJECT CONSISTENCY WITH CITY OF CERES GENERAL PLAN POLICIES: AGRICULTURAL RESOURCES**

General Plan Policy	Consistency with General Plan	Analysis
<p>Policy 1.B.4. The City shall phase future growth and development to provide for orderly growth and prevent premature conversion of agricultural lands. Two phases of growth within the Urban Growth Area are shown in Figure 1-1. Residential development will be permitted within the second phase when there is a demonstrated need for additional land and there is less than a five-year supply of appropriately-designated land available within the first phase.</p>	<p>Yes</p>	<p>The project site is located within Phase 1 of the Urban Growth Area and would result in orderly growth as discussed in Policy 1.B.4. The site has been designated by the City for Regional Commercial uses and is surrounded by existing or planned urban development. Implementation of the proposed project would not result in premature conversion of agricultural lands.</p>
<p>Policy 6.A.1. The City shall discourage leapfrog development and development in peninsulas extending into agricultural lands to avoid adverse effects on agricultural operations.</p>	<p>Yes</p>	<p>The project site is surrounded by existing or planned development and adjacent to SR 99. The site is within the current Ceres City Limits. The proposed project is not leapfrog development and would not result in a “peninsula” extending into agricultural lands.</p>
<p>Policy 6.A.4. The City shall require development adjacent to designated agricultural areas to minimize conflicts with adjacent agricultural uses.</p>	<p>Yes</p>	<p>The project site is not located adjacent to any lands designated for agricultural use.</p>

Source: Ceres, 1997 and PMC

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MITCHELL ROAD CORRIDOR SPECIFIC PLAN

The Mitchell Road Corridor Specific Plan, adopted by the City of Ceres in September 1995, establishes comprehensive guidance and regulations for the development of approximately 450 acres located along a portion of Mitchell Road between State Route 99 and the Tuolumne River, including the project site. No policies applicable to agricultural resources are included in the Mitchell Road Corridor Specific Plan. While this Draft EIR analyzes the proposed project's consistency with the Specific Plan pursuant to CEQA Section 15125(d), the City of Ceres will ultimately make the determination of the project's consistency with the Specific Plan. Environmental impacts associated with inconsistency with Specific Plan goals, objectives, or policies are addressed under the appropriate impact discussion sections of this Draft EIR.

4.11.3 PROJECT IMPACT ANALYSIS

STANDARDS OF SIGNIFICANCE

Based on the CEQA Guidelines Appendix G thresholds of significance, the proposed project would have a significant impact on agricultural resources if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use.

The Initial Study prepared for the proposed project determined that implementation of the project would not result in a conflict with existing zoning for agricultural use or a Williamson Act contract or result in conversion of off-site Farmland. Therefore, these issues will not be addressed further in this section of the Draft EIR.

METHODOLOGY

Evaluation of potential agricultural impacts of the proposed project was primarily based on review of the City of Ceres General Plan, City of Ceres General Plan EIR, Findings of Fact, and Statement of Overriding Considerations, the City of Ceres Zoning Ordinance, and field review of the project and surrounding area. Specific data related to agriculture was gathered from the California Department of Conservation Farmland Conversion Reports, 1992 to 1994, 1994 to 1996, 1996 to 1998, 1998 to 2000, 2000 to 2002, and 2002 to 2004, the California Department of Conservation Important Farmlands Map, and the Soil Survey of Stanislaus County, California.

IMPACTS AND MITIGATION MEASURES

Conversion of Prime Farmland

Impact 4.11.1 Implementation of the proposed project would result in the conversion of approximately 16.7 acres of Prime Farmland to nonagricultural uses. This would constitute the loss of an irreplaceable resource and is a **potentially significant** impact.

The project site was formerly used for agricultural practices and a 16.7-acre portion of the project site is designated as Prime Farmland by the Department of Conservation Farmland Mapping and Monitoring Program. Although the project site was formerly used for agricultural practices, the site has not been in active production for a number of years. Additionally, the project site is largely bound by commercial and residential uses to the north, west and east. Although the project site has not been actively utilized for agricultural production, the project will result in the conversion of approximately 16.7 acres of Prime Farmland, to non agricultural uses, reducing the amount of Important Farmland by approximately 0.004 percent in Stanislaus County.

The Ceres General Plan (1997) designates the project site for urban development, and the General Plan EIR (1996) identified the conversion of agricultural land to urban uses as a significant and unavoidable consequence of adopting and implementing the General Plan. The City adopted a finding that the 1997 General Plan would result in the conversion of approximately 3,000 acres of land classified as Prime Farmland and Farmland of Statewide Importance to urban development, and that this significant and unavoidable impact was outweighed by the benefits of implementing the General Plan. The proposed project would contribute to, but would not exceed, the loss of agricultural land considered and overridden when the 1997 General Plan was adopted. Implementation of the proposed project would result in the loss of agricultural land, including Prime Farmland, for agricultural use, which is considered **significant and unavoidable**.

Mitigation Measures

No feasible mitigation.

Conflict with Zoning and Land Use

Impact 4.11.2 The proposed project will not conflict with existing zoning for agricultural use or a Williamson Act Contract. This impact is **less than significant**.

Although the project site was formerly used for agricultural practices the property is zoned and designated for Regional Commercial use and is not included in a Williamson Act Contract. Impacts associated with the conversion of agricultural lands to non agricultural uses are discussed in Impact 4.11.1 above. This impact is considered **less than significant**.

Mitigation Measures

None required.

Indirect Conversion of Farmland

Impact 4.11.3 Implementation of the proposed project will not result in other changes in the existing environment which could result in conversion of Farmland to nonagricultural use. This impact is **less than significant**.

The conversion of the project site from Prime Farmland to non agricultural use is discussed in Impact 4.11.1 above. The project will not result in other changes in the existing environment or surrounding vicinity which would result in conversion of farmland beyond that discussed in Impact 4.11.3. This impact is considered **less than significant**.

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Mitigation Measures

None required.

4.11.4 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

CUMULATIVE SETTING

State

Throughout California, development pressures are resulting in the conversion of thousands of acres of agricultural land. The latest statewide study by the FMMP, Farmland Conversion Report 2002–2004, was released in December 2006. Statewide, agricultural land declined by nearly 171,000 acres between 2002 and 2004. Over 102,000 of these acres were lost to urbanization – a 10 percent increase from the 2000–2002 mapping cycle. Also between 2002 and 2004, over 78,000 acres of Prime Farmland were converted to nonagricultural use.

Region

The San Joaquin Valley, which includes Stanislaus County, experienced an overall increase in urbanization of approximately 10 percent in 2002–2004. However, urbanization of irrigated land increased 28 percent between 2002 and 2004, and Prime Farmland urbanization increased by 26 percent (from 9,412 to 11,869 acres) during the same time period. Conversion of Prime Farmland continued to be highest in the San Joaquin Valley, more than three times higher than in southern California during the same time period (USDA, 2002).

Local

As described above, the project site is located in central Stanislaus County in the incorporated City of Ceres. Stanislaus County has experienced a steady decline each year in all categories of Important Farmland except Unique Farmland. **Table 4.11-3** above provides detailed data on past farmland conversions in Stanislaus County.

The region surrounding the City of Ceres contains a great deal of farmland and associated farming operations (see **Figure 4.11-1**). As show in **Table 4.0-1**, there are a number of approved and planned future development projects within the City’s Sphere of Influence. Each of these projects could contribute to the cumulative conversion of Important Farmland in the county as they are built out. In particular, the City is preparing a specific plan for a large area located west of the city in unincorporated Stanislaus County.

CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Impacts to Agricultural Resources

Impact 4.11.2 The proposed project would contribute to cumulative impacts on agricultural lands. The project’s contribution is a **cumulatively considerable** impact.

As discussed under Impact 4.11.1 above, implementation of the proposed project would result in the conversion of approximately 16.7 acres of land classified as Prime Farmland. There are a number of other recently approved and planned future development projects in the City of Ceres and surrounding area that will likely also result in the loss of Important Farmlands depending on their individual locations. In particular, the City is preparing a specific plan for a

large area located west of the city in unincorporated Stanislaus County. This area is almost entirely classified as Important Farmland. Therefore, the project, in combination with the other planned development projects identified in **Table 4.0-1**, would result in a cumulatively considerable impact to the agricultural resources of the region and would contribute to the statewide loss of farmland.

The Final EIR for the City of Ceres General Plan (1996) determined that buildout of the General Plan would result in the conversion of approximately 3,000 acres of land designated as Prime Farmland or Farmland of Statewide Importance, including the project site, to urban uses. This impact was determined to be significant and unavoidable. Implementation of the project would contribute to this anticipated loss and to the ongoing conversion of farmland to urbanized uses in Stanislaus County, the greater Central Valley region, and the state.

Because the proposed project would permanently convert Prime Farmland to nonagricultural uses, it would significantly contribute to the cumulative loss of farmland in Stanislaus County and the State as a whole. Therefore, the project would have a **cumulatively considerable** contribution to this **significant and unavoidable** impact.

Mitigation Measures

No feasible mitigation.

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