

The purpose of this section is to disclose and analyze the potential impacts to agricultural resources associated with the development of the proposed Specific Plan. This section also discusses the potential conflicts between the proposed uses within the Plan Area and ongoing agricultural activities in the vicinity of the Plan Area. This section is primarily based on information from the following resources:

- City of Fresno *General Plan* (City of Fresno, 2014);
- City of Fresno *Master Environmental Impact Report EIR* (City of Fresno, 2014);
- *Fresno General Plan Public Review Draft Program Environmental Impact Report* (City of Fresno, 2020);
- Farmland Mapping and Monitoring Program (California Department of Conservation, 2016);
- Natural Resource Conservation Service (NRCS) *Web Soil Survey* (United States Department of Agriculture, 2017);
- Fresno County Crop Report (County of Fresno, Agricultural Commissioner, 2017).

Comments were received during the public review period or scoping meeting for the Notice of Preparation (NOP) regarding this topic from the following: Cathy Caples (August 1, 2019). The portion of the comment letter related to this topic is addressed within this section. Full comments received on the NOP are included in **Appendix A**.

3.2.1 ENVIRONMENTAL SETTING

CALIFORNIA AGRICULTURE

The California Department of Conservation Farmland Mapping and Monitoring Program identifies lands that have agriculture value and maintains a statewide map of these lands called the Important Farmlands Inventory (IFI). IFI classifies land based upon the productive capabilities of the land, rather than the mere presence of ideal soil conditions.

The suitability of soils for agricultural use is just one factor for determining the productive capabilities of land. Suitability is determined based on many characteristics, including fertility, slope, texture, drainage, depth, and salt content. A variety of classification systems have been devised by the State to categorize soil capabilities. The two most widely used systems are the Capability Classification System and the Storie Index. The Capability Classification System classifies soils from Class I to Class VIII based on their ability to support agriculture with Class I being the highest quality soil. The Storie Index considers other factors such as slope and texture to arrive at a rating. The IFI is in part based upon both of these two classification systems.

Soil Capability Classification System

The Soil Capability Classification System takes into consideration soil limitations, the risk of damage when 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 that are unsuitable for agriculture. Generally, as the rating of the capability classification increases, yields and profits are

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more difficult to obtain. A general description of soil classifications, as defined by the Natural Resources Conservation Service (NRCS) is provided in Table 3.2-1 below.

TABLE 3.2-1: SOIL CAPABILITY CLASSIFICATION

CLASS	DEFINITION
I	Soils have slight limitations that restrict their use.
II	Soils have moderate limitations that restrict choice plants or that require moderate conservation practices.
III	Soils have severe limitations that restrict the choice of plants or that require special conservation practices, or both.
IV	Soils have very severe limitations that restrict the choice of plants or that 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 limitations that preclude their use for commercial plans and restrict their use to recreation, wildlife habitat, water supply, or aesthetic purposes.

SOURCE: NRCS WEB SOIL SURVEY, 2019

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) 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 3.2-2.

TABLE 3.2-2: STORIE INDEX RATING SYSTEM

GRADE	INDEX RATING	DEFINITION
1	80 - 100	Few limitations that restrict their use for crops
2	60 – 80	Suitable for most crops, but have minor limitations that narrow the choice of crops and have a few special management needs
3	40 – 60	Suited to a few crops or to special crops and require special management
4	20 – 40	If used for crops, severely limited and require special management
5	10 – 20	Not suited for cultivated crops, but can be used for pasture and range
6	Less than 10	Soil and land types generally not suited to farming

SOURCE: NRCS WEB SOIL SURVEY, 2019

In addition to soil suitability, other factors for determining the agricultural value of land include whether soils are irrigated, the depth of soil, water-holding capacity, and physical and chemical characteristics. Areas considered to have the greatest agricultural potential are designated as Prime Farmland or Farmland of Statewide Importance; refer to the Farmland Mapping and Monitoring Program discussion below.

Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to continue the Important Farmland mapping efforts begun in 1975 by the United States Department of Agriculture

Soil Conservation Service (USDA-SCS). The intent of the USDA-SCS was to produce agriculture maps based on soil quality and land use across the nation. As part of the nationwide agricultural land use mapping effort, the USDA-SCS 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 USDA-SCS soil survey maps using the LIM criteria.

Since 1980, the State of California has assisted the USDA-SCS with completing its mapping in the state. The FMMP was created within the California Department of Conservation (CDC) to carry on the mapping activity on a continuing basis, and with a greater level of detail. The CDC 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 dependable water supply for agricultural production, soil temperature range, depth of the ground water table, flooding potential, rock fragment content, and rooting depth.

The CDC classifies lands into seven agriculture-related categories: Prime Farmland, Farmland of Statewide Importance (Statewide Farmland), Unique Farmland, Farmland of Local Importance (Local Farmland), Grazing Land, Urban and Built-up Land (Urban Land), and Other Land. The first four types listed above are collectively designated by the State as Important Farmlands. 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 surrounding classifications. Each of the seven land types is summarized below.

PRIME FARMLAND

Prime farmland is farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

FARMLAND OF STATEWIDE IMPORTANCE

Farmland of statewide importance is farmland with characteristics similar to those of prime farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

UNIQUE FARMLAND

Unique farmland is farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

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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.

GRAZING LAND

Grazing land is land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

URBAN AND BUILT-UP LAND

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

OTHER LAND

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

FRESNO COUNTY AGRICULTURE

Although the Plan Area is located within the Fresno Sphere of Influence (SOI), it is immediately adjacent to active agricultural operations in Fresno County. Agriculture is a major activity within the undeveloped portions of Fresno County. According to the 2017 Fresno County Crop Report, published by the Fresno County Agricultural Commissioner's Office, the gross value of Fresno County's agricultural production for 2017 was \$7,028,024,100. Almonds were the top agricultural commodity grown in the County, with production values near \$1.2 billion.

In 2017, Fresno County was estimated to have 1,359,540 acres of Important Farmland: 675,722 acres of Prime Farmland, 397,134 acres of Farmland of Statewide Importance, 94,902 acres of Unique Farmland, and 191,782 acres of Farmland of Local Importance [California Department of Conservation (CDC), 2016]. Over the past decade, the availability of Important Farmland has been consistently declining from year to year primarily because of conversions to urban and other developed land uses.

EXISTING SITE CONDITIONS

The Plan Area encompasses approximately 7,077 acres (approximately 11 square miles) in the City of Fresno city limits and unincorporated Fresno County. Of the eleven square miles within the Plan

Area, 6.9 square miles are in the city limits and 4.1 square miles are in the growth area. The growth area is land outside the city limits but within the City's SOI boundary, which is the adopted limit for future growth. A large amount of land within the Plan Area is farmland or rural residential lots with large, uneven, and underutilized parcels. The Plan Area is relatively flat with natural gentle slope near State Route 99. The Plan Area topography ranges in elevation from approximately 283 to 315 feet above mean sea level.

As shown on Figure 3.2-1, the Plan Area has approximately 3,099.9 acres of land that is classified as Urban and Built-Up, according to the State Department of Conservation. Prime Farmland is principally located outside of the Plan Area, with the exception of approximately 1.5 acres located near the western boundary, west of North Grantland Avenue. The Plan Area has 285.65 acres of Farmland of Statewide Importance which are located primarily in the western portion of the Plan Area. Approximately 505.39 acres of Unique Farmland are located within the Plan Area, most of which is within the southwest portion of the Plan Area. Farmland of Local Importance is located throughout the entire Plan Area, and totals approximately 1,562.82 acres. Vacant or Disturbed Land and Rural Residential Land account for approximately 1,650.17 acres within the growth area.

ADJACENT AGRICULTURAL USES

Surrounding land uses include State Route 99; the historic communities of Herndon and Highway City; and incorporated areas of the City of Fresno to the north; incorporated areas of the City of Fresno to the east (including mostly industrial uses); unincorporated Fresno County and incorporated areas of the City of Fresno to the south (including farmland uses, rural residential uses, low density residential uses, and underutilized parcels); and unincorporated Fresno County to the west (including farmland and rural residential uses).

Lands to the north, and east of the Plan Area are classified as urban and built up and are currently zoned for Light Industrial, Commercial and Mixed Use. Lands to the south of the Plan Area are classified as urban and built up with large portions classified as farmland of local importance. These lands are currently zoned for Low and Medium Density Residential, Community and General Commercial, Parks and Recreation, and Public and Institutional by the City of Fresno zoning map and zoned Rural Residential by the County Zoning map. The lands west of the Plan Area are classified as Farmland of Local Importance, Unique Farmland, Farmland of Statewide Importance and Prime Farmland as shown on Figure 3.2-1 and are currently zoned Exclusive Agricultural by the County of Fresno zoning map.

PROJECT AREA SOILS AND FARMLAND CHARACTERISTICS

The Soil Capability Classifications and Storie Index ratings are presented in Table 3.2-3. As shown in Table 3.2-3, the Soil Survey of Fresno County, shows that the Plan Area contains Capability Class II, Class III and Class IV (non-irrigated and irrigated soils). Soils present within the project area are shown in Figure 3.6-1 and described below.

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TABLE 3.2-3: ON-SITE SOIL CAPABILITY CLASSIFICATIONS AND STORIE INDEX RATING

SOIL NAME	SOIL CAPABILITY CLASSIFICATION ¹		STORIE INDEX	ACRES IN PLAN AREA
	IRRIGATED	NON-IRRIGATED		
Exeter loam	III _s	IV _s	35	215.7
Exeter sandy loam	III _s	IV _s	34	1,227.6
Exeter sandy loam, shallow	IV _s	IV _s	23	150.2
Hanford gravelly sandy loam	IV _s	II _s	72	15.0
Hanford sandy loam, benches	IV _e	II _e	86	17.3
Hesperia fine sandy loam moderately deep	IV _s	II _s	90	1.7
Pollasky fine sandy loam 2-9%	IV _e	IV _e	85	2.6
Pollasky sandy loam, 9-15%	IV _e	IV _e	78	5.3
San Joaquin loam, 0-3%	III _s	IV _s	31	213.4
San Joaquin loam, shallow, 0-3%	IV _s	IV _s	25	757.6
San Joaquin sandy loam, 0-3%	IV _s	IV _s	16	1,523.4
San Joaquin sandy loam, shallow, 0-3%	IV _s	IV _s	21	2,872.8
TOTAL				7,002.6

NOTES:

1. CAPABILITY SUBCLASSES ARE SOIL GROUPS WITHIN ONE CLASS. THEY ARE DESIGNATED BY ADDING A SMALL LETTER, E, W, S, OR C, TO THE CLASS NUMERAL, FOR EXAMPLE, II_e. THE LETTER 'E' SHOWS THAT THE MAIN HAZARD IS THE RISK OF EROSION UNLESS CLOSE-GROWING PLANT COVER IS MAINTAINED; 'W' SHOWS THAT WATER IN OR ON THE SOIL INTERFERES WITH PLANT GROWTH OR CULTIVATION (IN SOME SOILS THE WETNESS CAN BE PARTLY CORRECTED BY ARTIFICIAL DRAINAGE); 'S' SHOWS THAT THE SOIL IS LIMITED MAINLY BECAUSE IT IS SHALLOW, DROUGHTY, OR STONY; AND 'C', USED IN ONLY SOME PARTS OF THE UNITED STATES, SHOWS THAT THE CHIEF LIMITATION IS CLIMATE THAT IS VERY COLD OR VERY DRY.

SOURCE: NRCS WEB SOIL SURVEY, 2019.

Exeter Loam. This soil is located throughout the Plan Area, particularly in the eastern half, covering approximately 1,593.5 acres (see Figure 3.6-1). The Exeter series consists of moderately deep to a duripan, moderately well drained soils that formed in alluvium mainly from granitic sources. Exeter soils are on alluvial fans and stream terraces and have slopes of 0 to 9 percent. This soil is used for irrigated cropland growing oranges, olives and deciduous orchards, vineyards and row crops. It is also used for dairy and cattle production and building site development. Vegetation in uncultivated areas is mainly annual grasses and forbs. Moderately well drained; very slow to medium runoff; moderately slow permeability above the duripan. Permeability of the duripan is very slow.

Hanford Sandy Loam. This soil is located on approximately 32.3 acres in the northern corner of the Plan Area (see Figure 3.6-1). Hanford soils consists of very deep, well drained soils that formed in moderately coarse textured alluvium dominantly from granite. Hanford soils are on stream bottoms, floodplains and alluvial fans at elevations of 150 to 3,500 feet. Slopes range from 0 to 15 percent. The climate is dry subhumid mesothermal with hot, dry summers and cool, moist winters.

Hesperia Sandy Loam. This soil is located on approximately 1.7 acres on the northern corner of the Plan Area (see Figure 3.6-1). The Hesperia series consists of very deep, well drained soils that formed in alluvium derived primarily from granite and related rocks. Hesperia soils are on alluvial fans, valley plains and stream terraces and have slopes of 0 to 9 percent. Used for desert range, and for production of irrigated orchards, row crops, field crops, grain, hay, pasture and grapes. Native

vegetation consists of creosotebush in the high desert and sparse annuals in the valley. Well drained; negligible to low runoff, moderately rapid permeability.

Pollasky Sandy Loam. This soil is located on approximately 7.9 acres on the northern portion of the Plan Area (see Figure 3.6-1). The Pollasky series consists of moderately deep, well drained, moderately coarse textured Regosols formed in the residuum from softly to moderately consolidated arkosic sediments. They occur on undulating to steep dissected terraces under annual grasses and forbs. They have brown, slightly acid sandy loam A horizons and pale brown to yellowish brown, slightly acid to neutral, sandy loam C horizons abruptly overlying consolidated granitic sediments. Pollasky soils occur at elevations below 500 feet to semiarid mesothermal climate having a mean annual precipitation ranging from about 9 to 16 inches with hot, dry summers and cool, moist winters. The Pollasky series is mapped along the eastern edge of the San Joaquin Valley of California where it is moderately extensive. Used as annual range and dry farmed small grain, usually barley, with limited sprinkler irrigated pasture.

San Joaquin Loam. This soil is located throughout the entirety of the Plan Area on approximately 5,367.2 acres (see Figure 3.6-1). The San Joaquin series consists of moderately deep to a duripan, well and moderately well drained soils that formed in alluvium derived from mixed but dominantly granitic rock sources. They are on undulating low terraces with slopes of 0 to 9 percent. Well and moderately well drained; medium to very high runoff; very slow permeability. Some areas are subject to rare or occasional flooding. Typically used as cropland and livestock grazing; crops are small grains, irrigated pasture and rice; vineyards, fruit and nut crops.

3.2.2 REGULATORY SETTING

There are a number of regulatory agencies whose responsibility includes the oversight of the agricultural resources of the state including the California Department of Conservation. The following is an overview of the federal, State and local regulations that are applicable to the proposed Specific Plan.

FEDERAL

Farmland Protection Program

The Natural Resource Conservation Service (NRCS) administers the Farmland Protection Program (FPP). This is a program that is designed to conserve productive farmland. The NRCS provides funds to agencies for the purchase of conservation easements that meet the specific requirements of the program. Landowners that are interested in the program must agree to conserve their farmland for a minimum period of thirty years.

STATE

Williamson Act

The California Land Conservation Act of 1965, commonly known as the Williamson Act, was established based on numerous State legislative findings regarding the importance of agricultural

lands in an urbanizing society. Policies emanating from those findings include those that discourage premature and unnecessary conversion of agricultural land to urban uses and discourage discontinuous urban development patterns, which unnecessarily increase the costs of community services to community residents.

The Williamson Act authorizes each county to establish an agricultural preserve. Land that is within the agricultural preserve is eligible to be placed under a contract between the property owner and County that would restrict the use of the land to agriculture in exchange for a tax assessment that is based on the yearly production yield. The contracts have a ten-year term that is automatically renewed each year, unless the property owner requests a non-renewal or the contract is cancelled. If the contract is cancelled the property owner is assessed a fee of up to 12.5 percent of the property value. As of 2016, approximately 120 acres within the Plan Area are under a Williamson Act contract. Approximately 56 acres are under Williamson Act-Non-renewal, meaning enrolled lands for which non-renewal has been filed. Upon the filing of non-renewal, the existing contract remains in effect for the balance of the period remaining on the contract. During the non-renewal process, the annual tax assessment gradually increases. At the end of the nine-year non-renewal period, the contract expires and the land is no longer enforceably restricted. Within the Plan Area, approximately 64 acres are under Williamson Act-Mixed Enrollment Agricultural Land, meaning enrolled lands containing a combination of Prime, Non-Prime, Open Space Easement, or other contracted or enrolled lands not yet delineated by the County. Approximately 38 acres immediately adjacent to the Plan Area is under Williamson Act contract-Non-renewal.

Farmland Security Zones

In 1998 the state legislature established the Farmland Security Zone (FSZ) program. FSZs are similar to Williamson Act contracts, in that the intention is to protect farmland from conversion. The main difference however, is that the FSZ must be designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. The term of the contract is a minimum of 20 years. The property owners are offered an incentive of greater property tax reductions when compared to the Williamson Act contract tax incentives; the incentives were developed to encourage conservation of prime farmland through FSZs. The non-renewal and cancellation procedures are similar to those for Williamson Act contracts. The Plan Area and the immediately adjacent parcels are not within the FSZ program.

Agricultural Conservation and Mitigation Program

While the Plan Area is primarily designated as Urban and Built-Up Land by the California Department of Conservation, the Plan Area does contain prime soils as defined by the California Department of Conservation, Agricultural Conservation and Mitigation Program. According to the Agricultural Conservation and Mitigation Program, farmland shall be considered prime farmland if it meets the definition of "prime agricultural land" in Government Code Section 51201. Government Code Section 51201 states that prime agricultural land means any of the following:

- (1) All land that qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classifications.

- (2) Land which qualifies for rating 80 through 100 in the Storie Index Rating.
- (3) Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture.
- (4) Land planted with fruit- or nut-bearing trees, vines, bushes, or crops which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars (\$200) per acre.
- (5) Land which has returned from the production of unprocessed agricultural plant products an annual gross value of not less than two hundred dollars (\$200) per acre for three of the previous five years.

LOCAL

Fresno General Plan

The City's General Plan includes goals, policies, standards, and actions that strive to preserve agricultural resources and minimize conflicts between agricultural and urban uses. The following General Plan goals, policies, standards, and actions are relevant to the proposed Specific Plan.

RESOURCE CONSERVATION AND RESILIENCE

Objective RC-9: Preserve agricultural land outside of the area planned for urbanization under this General Plan.

Policy RC-9-a: Work to establish a cooperative research and planning program with the Counties of Fresno and Madera, City of Clovis, and other public agencies to conserve agricultural land.

Policy RC-9-b: Express opposition to residential and commercial development proposals in unincorporated areas within or adjacent to the Planning Area when these proposals would do any of the following:

- Make it difficult or infeasible to implement the General Plan;
- Contribute to the premature conversion of agricultural, open space, or grazing lands; or
- Constitute a detriment to the management of resources and/or facilities important to the region (such as air quality, water quantity and quality, traffic circulation, and riparian habitat).

Policy RC-9-c: In coordination with regional partners or independently, establish a Farmland Preservation Program. When Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is converted to urban uses outside City limits, this program would require that the developer of such a project mitigate the loss of such farmland consistent with the

requirements of CEQA. The Farmland Preservation Program shall provide several mitigation options that may include, but are not limited to the following: Restrictive Covenants or Deeds, In Lieu Fees, Mitigation Banks, Fee Title Acquisition, Conservation Easements, Land Use Regulations, or any other mitigation method that is in compliance with the requirements of CEQA. The Farmland Preservation Program may be modeled after some of all of the programs described by the California Council of Land Trusts.

3.2.3 IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project will have a significant impact on agricultural or forest resources if it will:

- 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;
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));
- Result in the loss of forest land or conversion of forest land to non-forest use;
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

IMPACTS AND MITIGATION MEASURES

Impact 3.2-1: Specific Plan implementation would convert Important Farmlands to non-agricultural land uses. (Significant and Unavoidable)

Within the city limits, the Plan Area is currently zoned for urban land uses (i.e., residential single family, multi-family, public and institutional, mixed use and commercial) and proposes zoning changes similar to the existing land uses. Land uses surrounding the Plan Area consist of light industrial, commercial general, commercial highway and auto, open space, single family residential, rural residential, single family residential agricultural, limited agriculture, exclusive agriculture and other similar land uses. The Plan Area is located adjacent to productive agricultural land or lands zoned for agricultural uses, primarily within the County of Fresno limits. Although the Specific Plan anticipates and plans for future annexation and development of this land into the City, annexation is not currently proposed. The timing of future annexation proposals is not currently known. At the time of annexation proposals, the land proposed for annexation and development would be reviewed to determine if important farmlands would be converted to non-agricultural land uses or result in a conflict with lands zoned for agricultural uses. If future annexation and development would involve the loss of important farmlands to non-agricultural uses, implementation of

Mitigation Measure 3.2-1 would be required. While implementation of Mitigation Measure 3.2-1 would reduce the above-identified impact through preservation of agricultural land at a 1:1 ratio, the impact would not be reduced to a less-than-significant level due to the fact that active agricultural land would still be permanently converted to urban uses. Consistent with the Fresno General Plan EIR, feasible mitigation measures do not exist to reduce the above impact to a less-than-significant level. Therefore, the impact would remain **significant and unavoidable**.

MITIGATION MEASURE(S)

Mitigation Measure 3.2-1: *Prior to initiation of grading activities, the project proponent shall implement the following measure to mitigate impacts on Important Farmland located on the site: The project proponent shall mitigate the loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance within the Plan Area at a 1:1 ratio. The acreage of lost farmland shall be determined using the Land Evaluation and Site Assessment (LESA) Model. The LESA Model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. Once the acreage of farmland converted is determined, one of the following mitigation options shall be utilized to mitigate the loss: Restrictive Covenants or Deeds, In Lieu Fees, Mitigation Banks, Fee Title Acquisition, Conservation Easements, or Land Use Regulation. Should the City develop a Farmland Preservation Program before future construction within the Plan Area begins, the project proponent shall mitigate for Farmland pursuant to the Program.*

The mitigation shall be verified by the City of Fresno for each phase of the project during improvement plan review.

Impact 3.2-2: Specific Plan implementation would conflict with existing zoning for agricultural use, or a Williamson Act Contract. (Significant and Unavoidable)

The Planning Area includes approximately 120 acres of lands that are under a Williamson Act Contract. Of the 120 acres of Williamson Act Contract land, approximately 56 acres are under Williamson Act Contract-Non-Renewal; thus, at the end of the non-renewal period, the lands would no longer be restricted to agricultural use. The approximately 120 acres are currently designated for medium density residential, urban neighborhood, and open space uses under the Fresno General Plan and those acres within the Fresno city limits are currently designated residential medium density and those acres within the County of Fresno are currently zoned Rural Residential. Agricultural uses are currently permitted in areas designated as rural residential. Under the proposed Specific Plan, the approximately 120 acres of Williamson Act Contract land are proposed for Low Density, Medium Low Density, and Medium Density Residential where agricultural uses are intended to be transitioned to urban residential uses. The existing agricultural uses can continue to operate, but potentially as legal non-conforming land uses. However, future revisions to the zoning map related to agricultural uses would result in a significant impact on existing zoning for agricultural uses because non-agricultural uses, such as low, medium low density, and medium density residential would be allowed on the existing Contract land.

The proposed project would be required to implement Mitigation Measure 3.2-1. However, even after implementation of Mitigation Measure 3.2-1, this would be considered a potentially significant impact. As such, Mitigation Measure 3.2-2 would be required, which requires that land zoned for agricultural uses shall be mitigated at a 1:1 ratio. Additionally, future development resulting in the transition of agricultural land to non-agricultural uses would be required to comply with General Plan policies related to the conversion of agricultural land. While implementation of Mitigation Measure 3.2-2 would reduce the above-identified impact through preservation of agricultural land at a 1:1 ratio, the impact would not be reduced to a less-than-significant level due to the fact that land zoned for agricultural uses would still be permanently converted to urban uses. Therefore, this would be considered a **significant and unavoidable** impact.

MITIGATION MEASURE(S)

Mitigation Measure 3.2-2: *Prior to initiation of grading activities, the project proponent shall implement the following measure to mitigate impacts related to agriculturally-zoned land located on the site: The project proponent shall mitigate the loss of land zoned for agricultural use within the Plan Area at a 1:1 ratio. Once the acreage of land zoned for agricultural use which would be converted by the project is determined, one of the following mitigation options shall be utilized to mitigate the loss: Restrictive Covenants or Deeds, In Lieu Fees, Mitigation Banks, Fee Title Acquisition, Conservation Easements, or Land Use Regulation.*

The mitigation shall be verified by the City of Fresno for each phase of the project during improvement plan review.

Impact 3.2-3: Specific Plan implementation would not conflict with existing zoning, or cause rezoning of, forest land, timberland or timberland zoned Timberland Production or result in the loss of forest land or conversion of forest land to non-forest use. (No Impact)

The Plan Area and surrounding area does not include any land designated or zoned as forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526) or timberland zoned for Timberland Production (as defined by Government Code section 51104(g)). Additionally, there are no forest lands within the Plan Area or surrounding area. Therefore, because the proposed project would not conflict with existing zoning or cause rezoning of forest land or timberland, or result in the loss of forest land or the conversion of forest land to non-forest use, implementation of the proposed project would result in **no impact** to forest resources or timberland.

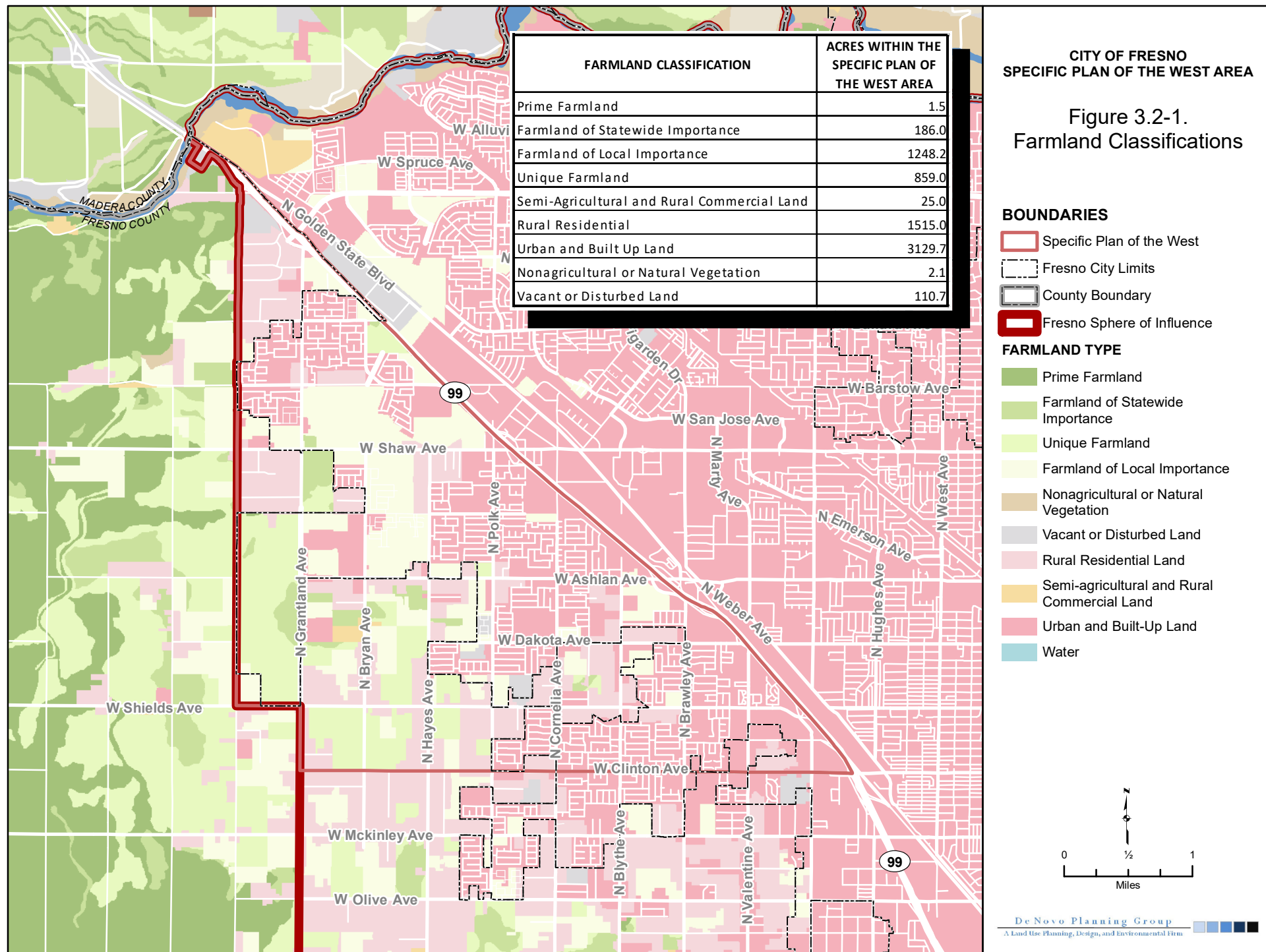
Impact 3.2-4: Future development of the Plan Area would not result in other changes in the existing environment that would lead to the abandonment of agricultural operations and conversion of farmland or forest land to non-agricultural or non-forest land use. (Less than Significant)

As discussed in Impact 3.2-1, future development in accordance with the proposed Specific Plan would result in the conversion of farmland to a non-agricultural use. Except for direct conversion, implementation of the Specific Plan would not result in other changes in the existing environment that would impact agricultural land outside of the Plan Area. Although the Specific Plan may convert land to more urbanized uses, it will not contribute to the same occurring outside of the Plan Area because the land outside of the Plan Area is within the County and outside the City's SOI and growth Boundary.

In addition, Fresno County's Right to Farm Ordinance is intended to reduce the occurrence of such conflicts between nonagricultural and agricultural land uses between the County of Fresno and the City of Fresno through requiring the transferor of any property in the County to provide a disclosure statement describing that the County permits agricultural operations. Projects outside of the Plan Area that are compliant with the County's Right to Farm Ordinance would include adequate measures to buffer project uses from adjacent agricultural uses and would reduce adverse effects on neighboring agricultural uses. Since the proposed Specific Plan would not result in other changes that would lead to the abandonment of agricultural operations or the conversion of farmland to non-agricultural land uses, impacts would be *less than significant* in this regard.

Separately, the development in accordance with the proposed project would not impact forest land because no parcel within or adjacent to the Plan Area are designated as forest land or forest land use. Therefore, the proposed project would result in *no impact* on farmland or forest land involving other changes in the existing environment.

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Sources: California Department of Conservation Farmland Mapping and Monitoring Program, Fresno County 2018 and Madera County 2016; Fresno County; City of Fresno. Map date: March 1, 2021.

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