CHAPTER 6 – AGRICULTURE

This chapter presents the existing conditions and the potential environmental effects of each Environmental Impact Statement/Environmental Impact Report (EIS/EIR) alternative on the agricultural resources and agricultural activities within the Planning Area. The agricultural resources discussed and analyzed in this chapter include farmlands such as row crops, orchards, and vineyards and the Planning Area’s natural grasslands that are used for grazing and other agricultural activities.

6.1 AFFECTED ENVIRONMENT/ENVIRONMENTAL SETTING

6.1.1 Regulatory Framework

This section includes a summary of applicable federal, state, and local regulations; policies for the agencies that have regulatory responsibilities for the protection of agricultural resources; and activities within the Planning Area. Pursuant to Title 40 of the Code of Federal Regulations, Section 1502.25, these applicable policies and plans helped to determine the appropriate scope of analysis included in Chapter 4, Land Use. This section discusses the basic responsibilities of these agencies, explains the relevant agency regulations, and describes the planning documents that are relative to the Planning Area.

6.1.1.1 Federal

Farmland Protection Policy Act of 1984

The Farmland Protection Policy Act requires federal agencies to consider how their activities or responsibilities that involve financing or assisting construction of improvement projects or acquiring, managing, or disposing federal land and facilities may affect farmland. Planned development or infrastructure projects must assess their potential effects on the loss or conversion of farmland.

The federal lead agency must consult with the U.S. Department of Agriculture’s Natural Resources Conservation Service to complete a Land Evaluation and Site Assessment for the affected area. As part of the Land Evaluation and Site Assessment process, the federal lead agency is responsible for coordinating completion of the Farmland Conversion Impact Rating Form with the Natural Resources Conservation Service. A Land Evaluation and Site Assessment process may be required for some of projects, and if required, is prepared at the time an application for development is filed with the lead agency.

Safe Harbor Agreements

Private property owners can voluntarily enter into a Safe Harbor Agreement with the U.S. Fish and Wildlife Service and engage in activities that are beneficial to endangered species on their property. In turn, property owners are provided assurances that new land use restrictions will not be required on the property, even if the population of listed species on the subject property increases. The assurances are provided by the U.S. Fish and Wildlife Service through an Enhancement of Survival Permit issued to the property owner and under the authority of Section 10(a)(1)(A) of the federal...
Endangered Species Act. This permit authorizes incidental take of species that may result from actions undertaken by the landowner under the Safe Harbor Agreement, provided that the landowner is following the provisions of said agreement by providing a net conservation benefit that contributes to the recovery of the subject Covered Species. The contribution toward recovery varies from case to case. The Safe Harbor Agreement does not have to provide permanent conservation for the enrolled property. Safe Harbor Agreements would be applicable for lands within the Planning Area where protected species or protected habitat are present.

### 6.1.1.2 State

**Farmland Mapping and Monitoring Program (FMMP)**

The State of California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data for use in analyzing impacts to agricultural resources in the state (CDOC 2013). The FMMP Important Farmland Maps include the defined mapping categories listed in Table 6-1.

<table>
<thead>
<tr>
<th>Category</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prime Farmland (P)</td>
<td>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 4 years prior to the mapping date.</td>
</tr>
<tr>
<td>Farmland of Statewide Importance (S)</td>
<td>Farmland similar to 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 4 years prior to the mapping date.</td>
</tr>
<tr>
<td>Unique Farmland (U)</td>
<td>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 4 years prior to the mapping date.</td>
</tr>
<tr>
<td>Farmland of Local Importance (L)</td>
<td>Land of importance to the local agricultural economy as determined by each county’s board of supervisors and a local advisory committee.</td>
</tr>
<tr>
<td>Grazing Land (G)</td>
<td>Land on which the existing vegetation is suited to the grazing of livestock.</td>
</tr>
<tr>
<td>Urban and Built-Up Land (D)</td>
<td>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, and public administration uses; railroad and other transportation yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment; water control structures; and other developed purposes.</td>
</tr>
<tr>
<td>Other Land (X)</td>
<td>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 40 acres. Vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.</td>
</tr>
<tr>
<td>Water (W)</td>
<td>Perennial water bodies with an extent of at least 40 acres.</td>
</tr>
</tbody>
</table>

*Source: CDOC 2013.*
California Land Conservation Act (Williamson Act)

The California Land Conservation Act, commonly referred to as the Williamson Act, is the state’s primary program for restricting the uses of agricultural and open space lands to farming and ranching. The Williamson Act is a voluntary program that offers reduced property taxes on lands that have been placed under a Williamson Act contract, which requires that the land remain available for agricultural use for a minimum of 10 years.

Land Use and Resource Management Plan for the Primary Zone of the Delta

Policies contained in the Agricultural chapter of the Land Use and Resource Management Plan for the Primary Zone of the Delta (Delta Protection Commission 2010) relevant to the EIS/EIR alternatives apply to the areas of the EIS/EIR Planning Area that are west of Interstate 5. Relevant policies include the following (Delta Protection Commission 2010):

Policy P-2: Conversion of land to non-agriculturally-oriented uses should occur first where productivity and agricultural values are lowest.

Policy P-4: Support agricultural programs that maintain economic viability and increase agricultural income in accordance with market demands, including but not limited to wildlife-friendly farming, conservation tillage and non-tillage.

Policy P-5: Local governments shall encourage implementation of the necessary plans and ordinances to: maximize agricultural parcel size; reduce subdivision of agricultural lands; protect agriculture and related activities; protect agricultural land from conversion to non-agriculturally-oriented uses. An optimum package of regulatory and incentive programs could include: (1) an urban limit line; (2) minimum parcel size consistent with local agricultural practices and needs; (3) strict subdivision regulations regarding subdivision of agricultural lands to ensure that subdivided lands will continue to contain agriculturally-oriented land uses; (4) require adequate buffers between agricultural and non-agricultural land uses particularly residential development outside but adjacent to the Primary Zone; (5) an agriculture element of the general plan; (6) a Right-to-Farm ordinance; and (7) a conservation easement program.

Policy P-6: Encourage acquisition of agricultural conservation easements from willing sellers as mitigation for projects within each county. Promote use of environmental mitigation in agricultural areas only when it is consistent and compatible with ongoing agricultural operations and when developed in appropriate locations designated on a countywide or Delta-wide habitat management plan.
Policy P-7: Encourage management of agricultural lands which maximize wildlife habitat seasonally and year-round, through techniques such as fall and winter flooding, leaving crop residue, creation of mosaic of small grains and flooded areas, wildlife friendly farming, controlling predators, controlling poaching, controlling public access, and others.

Policy P-8: Encourage the protection of agricultural areas, recreational resources and sensitive biological habitats, and the reclamation of those areas from the destruction caused by inundation.

California Right to Farm Act

The “Right to Farm Act” (California Civil Code Sections 3482.5, 3482.6, 3483, and 3484 collectively) is a statewide agricultural protection act. Similar to Sacramento County Code Chapter 14.05 (the Right to Farm Ordinance, discussed below), the Right to Farm Act helps protect agricultural operations, activities, facilities, etc. from nuisance complaints. Unlike the County Code, the Right to Farm Act has a broader sweep of protections with the intention of shielding agricultural processing activities, operations, and facilities, such as the processing of dairy products, the production of wine, the processing of meat and egg products, the drying of fruits and grains, the packing and cooling of fruits and vegetables, and the processing for wholesale and retail markets of agricultural products. The Planning Area has many of these processing facilities and operations. The Right to Farm Act prevails over contrary provisions of any city or county ordinance.

6.1.1.3 Local

Sacramento County General Plan

The Sacramento County General Plan of 2005–2030 (Sacramento County General Plan) (Sacramento County 2011) includes an Agriculture Element, which identifies Sacramento County’s overall agricultural goals of protecting the County’s agricultural lands, maintaining the productivity of those lands, and promoting/supporting agricultural activities as an integral part of the Sacramento County economy. The Agriculture Element also includes specific Objectives and Implementation Measures to allow achievement of the stated goals.

The Sacramento County General Plan’s Conservation Element (Sacramento County 2011) also contains goals and policies related to agriculture. Specifically, this element directs that preserves established\(^1\) to protect ecological resources should be planned and managed to avoid conflicts with adjacent agricultural activities. It also directs that sensitive habitat areas on public lands should be protected from exposure to pesticides and other similar chemical applications.

\(^1\) Note that in the context of this Plan, the word “establish” is synonymous with “create.”
Finally, this element notes that ranching and grazing may be compatible activities with preserves established to protect and conserve vernal pool habitat and that native vegetative habitats should be protected from improper grazing activities on public lands.

The Sacramento County General Plan Agriculture Element contains the following policies relevant to agriculture in the Planning Area (Sacramento County 2011):

**Policy AG-1**: The County shall protect Prime, Statewide Importance, Unique and Local Importance farmlands located outside of the [urban services boundary] USB from urban encroachment.

**Policy AG-3**: The County shall permit agricultural uses on buffers, provided such uses are conducted in a manner compatible with urban uses. Buffers shall be used to separate farming practices incompatible with adjacent urban uses. Any homeowners’ association or similar entity within the development shall assist in determining compatible use. Buffers shall not adversely conflict with agricultural uses on adjoining property.

**Policy AG-5**: Projects resulting in the conversion of more than fifty (50) acres of farmland shall be mitigated within Sacramento County, except as specified in the following text, based on a 1:1 ratio, for the loss of the following farmland categories through the specific planning process or individual project entitlement requests to provide in-kind or similar resource value protection (such as easements for agricultural purposes):

- Prime, Statewide Importance, Unique, Local Importance, and Grazing farmlands located outside the USB;
- Prime, Statewide Importance, Unique, and Local Importance farmlands located inside the USB.

The Board of Supervisors retains the authority to override impacts to Unique, Local, and Grazing farmlands, but not with respect to Prime and Statewide farmlands.

However, if that land is also required to provide mitigation pursuant to a Sacramento County endorsed or approved Habitat Conservation Plan (HCP), then the Board of Supervisors may consider the mitigation land provided in accordance with the HCP as meeting the requirements of this section including land outside of Sacramento County.²

² Note: This policy is not tied to any maps contained in the Agriculture Element. Instead, the most current Important Farmland map from the Department of Conservation should be used to calculate mitigation.
Policy AG-10: The County shall balance the protection of Prime, Statewide Importance, Unique, and Local Importance farmlands and farmlands with intensive agricultural investments with the preservation of natural habitat so that the protection of farmland can also serve to protect habitat.

Policy AG-11: Cooperation shall be encouraged between landowners of Prime, Statewide Importance, Unique, and Local Importance farmlands or land with intensive agricultural investments and landowners of natural resource preserves, including mitigation banks, mitigation sites, and wildlife refuges, so that both habitat preservation and standard farming practices mutually benefit.

Policy AG-12: The County will cooperate with landowners of agriculturally zoned properties to promote the placing of natural preserve/mitigation amenities on land, such as trees and other biota enhancing improvement, by making sure amenities are assets to both the natural preserve/mitigation areas and agriculture practices.

Policy AG-13: Indemnification against property losses from recreational users should be provided to agricultural property owners adjacent to mitigation banks, environmental mitigation sites, wildlife refuges, or other natural resource preserves provided loss is proven to be a direct and exclusive result of new recreational access provided by the establishment of, and occurring through, such sites, and provide law enforcement access to such sites.

Policy AG-14: The County shall initiate intergovernmental agreements with state and federal wildlife management authorities in order to mitigate loss of Prime, Statewide Importance, Unique, and Local Importance farmlands or land with intensive agricultural investment due to natural habitat conversion.

Policy AG-15: The County shall pursue opportunities to create mitigation banks, environmental mitigation sites, wildlife refuges, or other natural resource preserves wherein substantial agricultural activities that are compatible with protection of high habitat values continue, but incompatible activities and conversion for development are precluded by conservation easements.

Policy AG-16: Maintain private ownership by coordinating with non-profit organizations to acquire conservation easements for preserving farmlands.

Policy AG-17: The establishment of conservation easements combining preservation of agricultural uses, habitat values, and open space on the same property should be encouraged where feasible.
**Policy AG-19:** Recreational trails shall be designed in cooperation with adjacent property owners to minimize adverse impacts on farming practices.

**Policy AG-20:** Public recreation trails adjacent to permanent agriculture shall be designed to provide appropriate vehicle access for law enforcement needs.

**Policy AG-21:** The County encourages the preservation of Prime, Statewide Importance, Unique, and Local Importance farmlands, including opposing any residential or commercial development for the Cosumnes River or Deer Creek riparian areas which are not compatible with agricultural uses.

**Policy AG-22:** If land within the Cosumnes River watershed is developed for non-agricultural purposes, the County should actively pursue easement dedication for equestrian trails and bikeways within such development as a condition of approval.

**Policy AG-23:** The County seeks to minimize agricultural/trail-user conflicts by recommending and seeking buffer zones between trails and nearby agricultural land and by locating trails away from the Cosumnes and Deer Creek riparian areas.

**Policy AG-25:** Outside the Urban Service Boundary, the County shall encourage landowners to enter into Williamson Act contracts or, as appropriate, to rescind Notices of Nonrenewal. Provide support to keep property in the Williamson Act by allowing agricultural-friendly land use practices that include additional economic incentives, and support replacing existing Williamson Act contracts with amended contracts that include agricultural-friendly land use practices.

**Policy AG-28:** The County shall actively encourage conservation of soil resources.

**Sacramento County Code**

The Sacramento County Code Chapter 14.05 (2016) establishes the County’s “Right-to-Farm” ordinance, which states the right of landowners to continue agricultural activities in the vicinity of non-agricultural land uses. The ordinance prioritizes commercially productive agricultural land uses and protects these uses from potential issues of land use compatibility that may arise due to the development of non-agricultural land uses adjacent to existing agricultural land. The agricultural activity, operation, or facility must have been in operation for more than 3 years, not been declared a nuisance at the time it began, and operate consistently with accepted agricultural customs and standards in order to be protected under the ordinance.


Galt General Plan

The Conservation Element of the 2030 Galt General Plan: Policy Document (Galt General Plan) (Galt 2009a) identifies agricultural lands surrounding Galt as a valuable component of the City’s open space resources, and establishes a goal of preserving and enhancing these lands. The policy included in the Galt General Plan that addresses agricultural lands includes the following (Galt 2009a):

Policy COS-4.1: Prime Agricultural Land Preservation. The City shall work to preserve prime agricultural lands surrounding the Planning Area from future development by creating a clear and sensitive urban transition to minimize land use conflicts and protect long-term agriculture.

The Galt Municipal Code does not include a “Right-to-Farm” ordinance or other mechanism to protect agricultural uses if land use compatibility issues arise.

Rancho Cordova General Plan

Rancho Cordova has only a limited amount of agricultural land, and the City of Rancho Cordova General Plan (Rancho Cordova General Plan) (Rancho Cordova 2006a) recognizes that most areas that currently support agriculture within the City limits will be developed with urban and suburban uses. The Rancho Cordova General Plan includes policies and measures that recognize the right of existing agricultural uses to continue as long as the landowner/farmers desire, to minimize land use conflicts/impacts to urban and agricultural uses through the use of buffers and other similar methods, and to mitigate for the loss of farmland through the preservation of an equal amount of land that is of equal or higher agricultural value.

Applicable policies in the Rancho Cordova General Plan include the following (Rancho Cordova 2006a):

Policy LU.1.8: While agricultural uses are anticipated to be phased out within the City limits, the City recognizes the right of these uses to continue as long as their individual owners/farmers desire.

Policy LU.1.9: The City shall require development to protect 1 acre of existing farmland of equal or higher quality for each acre of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance that would be converted to non-agricultural uses. This protection may consist of the establishment of farmland conservation easements, farmland deed restrictions, or other appropriate farmland conservation in perpetuity, but may also be utilized for compatible wildlife conservation efforts. The farmland to be preserved shall be located within Sacramento County and must have adequate water
supply to support agricultural use. As part of the consideration of land areas proposed to be protected, the City shall consider the benefits of preserving farmlands in proximity to other protected lands.

**Policy LU.1.10:** The City shall ensure that the following standards are met regarding agricultural conservation easement content:

- Provisions of an accurate legal document that prohibits any activity that substantially impairs or diminishes the agricultural productivity of the land;
- Protection of any existing water rights necessary to maintain agricultural uses and retain such water rights for ongoing use on the agricultural land; and
- Interests in the agricultural land shall be held in trust by the City and/or an entity acceptable to the City, in perpetuity.

**Rancho Cordova Municipal Code**

The Rancho Cordova Municipal Code Chapter 14.05 (2016) establishes a “Right-to-Farm” ordinance protecting agricultural land uses in the vicinity of non-agricultural land uses. While agricultural production may generate noise, odor, dust, and other undesirable effects to adjacent non-agricultural land uses, the ordinance considers these effects acceptable in the furtherance of General Plan goals intended to preserve and enhance agricultural production. The agricultural activity, operation, or facility must have been in operation for more than 3 years, not been declared a nuisance at the time it began, and operate consistent with accepted agricultural customs and standards to be protected under the ordinance. Chapter 23.904 of the Rancho Cordova Municipal Code (2016) sets forth development and operating standards for agricultural activities to mitigate potential adverse effects of agricultural activities on adjacent and surrounding land uses.

**6.1.2 Planning Area Agricultural Resources and Activities**

This section describes the existing agricultural resources (farmland) and activities (i.e., active farming or grazing) that occur within the EIS/EIR Planning Area. In the eastern portion of the Planning Area, agricultural activities primarily consist of ranching and grazing. The central portion of the Planning Area supports more irrigated pasture and grassland. The southwestern portion of the Planning Area supports more vineyards and croplands and includes the Cosumnes River floodplain. Figure 6-1 shows the locations of Important Farmlands within the Planning Area.

**6.1.2.1 Important Farmlands**

According to current FMMP data (CDOC 2014), approximately 256,832 acres of the 317,655-acre Planning Area are considered Important Farmland (Table 6-2). As indicated on Figure 6-1, more than half of this Important Farmland is used for grazing lands and is not actively cultivated.
### Table 6-2. Important Farmland within the Planning Area

<table>
<thead>
<tr>
<th>Agricultural Land</th>
<th>Sacramento County</th>
<th>Rancho Cordova</th>
<th>Galt</th>
<th>Total for Planning Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prime Farmland</td>
<td>35,769</td>
<td>15</td>
<td>35</td>
<td>35,819</td>
</tr>
<tr>
<td>Unique Farmland</td>
<td>13,899</td>
<td>159</td>
<td>0.4</td>
<td>14,058</td>
</tr>
<tr>
<td>Farmland of Statewide Importance</td>
<td>39,653</td>
<td>22</td>
<td>248</td>
<td>39,923</td>
</tr>
<tr>
<td>Farmland of Local Importance</td>
<td>32,611</td>
<td>242</td>
<td>379</td>
<td>33,231</td>
</tr>
<tr>
<td>Grazing Land</td>
<td>128,858</td>
<td>4,867</td>
<td>76</td>
<td>133,801</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>250,790</strong></td>
<td><strong>5,305</strong></td>
<td><strong>737</strong></td>
<td><strong>256,832</strong></td>
</tr>
</tbody>
</table>

Source: CDOC 2014.
Figure 6-1  Important Farmlands within Study Area
6.1.2.2 Types of Agricultural Activities

A variety of agricultural activities occur within the Planning Area, primarily outside the Urban Development Area (UDA). In general, these activities include cultivation of row crops, irrigated pasture, fruit and nut orchards, and vineyards. Agricultural lands within the Planning Area can generally be described as follows:

- **Row and Field Crops:** Many row and field crops are concentrated in the portion of the Cosumnes River floodplain that is in the southwest of the Planning Area. Row and field crops include all non-orchard and non-vineyard agricultural crops, such as rice and other small grains, corn, tomatoes, melons, peppers, safflower, sunflower, and short-term perennial crops (e.g., asparagus, alfalfa).

- **Irrigated Pasture and Grasslands:** Irrigated pasture and grasslands occur in a scattered distribution generally in the central portion of the Planning Area. Irrigated pasture and grasslands includes hay production (wheat, oats, clovers, mixed grasses), seasonal summer pasture for livestock (primarily cattle), and year-round pasture for livestock (primarily cattle or horses). Seasonal pasture appears to be the most common use. Irrigated pasture and grasslands are typically seeded, cut/grazed, and reseeded on a regular basis on an approximately 5- to 7-year cycle before the fields are left fallow to rest and the cycle is started over again. Irrigated pasture and grasslands do not encompass dry grazing, as noted in the following text.

- **Fruit and Nut Orchards:** Orchards are scattered throughout the Planning Area, with the largest concentration along the western boundary. Fruit tree orchards include apples, cherries, pears, apricots, chestnuts, kiwi, nectarines, olives, peaches, and plums. Nut tree orchards include walnuts, almonds, pecans, pistachios, and chestnuts.

- **Vineyards:** Vineyards are located in many areas of the Planning Area, with concentrations north and south of Twin Cities Road in Preserve Planning Unit 7, west of Interstate 5 in Preserve Planning Unit 6, and near the UDA boundary southeast of Grant Line Road. In Sacramento County, vineyards are primarily established for wine grape production, with some minor table grape producers. Vineyards are primarily “clean cultivated,” meaning no other vegetation is allowed to grow between the rows or on the edges of fields and irrigation ditches.

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3 As discussed in Section 1.1.1, Geographic Scope of the EIS/EIR Planning Area, the term Urban Development Area (UDA) is used by the EIS/EIR to discuss all lands where urban development Covered Activity projects or activities could occur under the action alternatives. Therefore, UDA means all lands within Sacramento County’s USB boundary that are also within the Planning Area (including lands within the Rancho Cordova city limits that are within the Planning Area), all lands within Galt’s city limits, and all lands within Galt’s sphere of influence (SOI) (see Figure 1-1).
In addition to these agricultural lands, ranchers use extensive areas of non-irrigated valley grassland within the Planning Area for livestock grazing.

6.1.2.3 Williamson Act Lands

Approximately 139,890 acres within the Planning Area is currently under active Williamson Act contracts (CDOC 2016). Approximately 10,400 acres of these active contracts is identified for nonrenewal. Figure 6-2 shows lands under Williamson Act contracts that are in the Planning Area.

6.2 ENVIRONMENTAL CONSEQUENCES/ ENVIRONMENTAL IMPACTS

6.2.1 Methodology for Assessing Impacts of Each Alternative on Agricultural Resources

This section describes the potential impacts of the actions and projects associated with each EIS/EIR alternative on the agricultural resources and activities in the Planning Area. Potential ways that the EIS/EIR alternatives could affect agricultural resources or activities include converting agricultural lands designated as Important Farmland to a developed land cover type or limiting or eliminating the ability of active farming or grazing activities to continue.

As discussed in Section 3.6.4, Addressing Incomplete or Unavailable Information in Chapters 4 through 16, geographic information system methodology was used to quantitatively estimate the direct impacts of each EIS/EIR alternative on Important Farmland and on lands with Williamson Act contracts. Geographic information system datasets of future projects and activities expected under each EIS/EIR alternative were digitally overlaid (compared) to separate geographic information system datasets of FMMP of Important Farmlands and Williamson Act lands.

It is appropriate to consider impacts to certain environmental resources within the context of other impacts occurring in the surrounding landscape, community, or region (see Section 3.6.2, Geographic Study Area of Resource Topics Analyzed in Chapters 4 through 16).

The study area used to analyze direct and indirect effects of the alternatives on agriculture is the Planning Area. The lead agencies determined that an appropriate geographic scale for evaluating the cumulative impacts of each EIS/EIR alternative on agriculture lands and activities should include all agricultural resources and activities within the Sacramento Area Council of Government’s six-county region (SACOG 2016), which includes all of Sacramento, Placer, El Dorado, Sutter, Yolo, and Yuba Counties.
As discussed in Section 3.7, Cumulative Effects Analysis in Resource Chapters 4 through 16, the Chapter 6 cumulative analyses of impacts to agriculture resources will consider (1) the effects of past and present urban development within in the Planning Area (see Existing Conditions in Section 6.1.2, Planning Area Agricultural Resources and Activities) and within the larger six-county study area, and (2) future impacts expected from other reasonably foreseeable projects in the Planning Area (see Section 3.7) and other reasonably foreseeable projects within the larger six-county study area. The cumulative analysis of each EIS/EIR alternative will then consider whether the incremental impacts of the alternative on agricultural resources and agricultural activities would be significant (i.e., would be cumulatively considerable).

As discussed in Section 3.4, Previous Planning Area Environmental Reviews, and Section 6.1.1.3, Local, the EIR documents previously prepared for the General Plans of Sacramento County, Galt, and Rancho Cordova (Sacramento County 2010; Galt 2009b; Rancho Cordova 2006b) analyzed direct and cumulative impacts of urban growth planned within their jurisdictions, including impacts to agricultural resources and agricultural activities. When the impact analyses or conclusions provided in these General Plan EIR documents were determined by the lead agencies to be appropriate for use in the analysis of the EIS/EIR alternatives, a brief summary or description of the incorporated information or analysis is provided in Sections 6.2.2, No Action/No Project Alternative; 6.2.3, Proposed Action/Proposed Project Alternative; and 6.2.4, Reduced Permit Term Alternative.

As discussed in Section 3.8.1, Significance Thresholds, the criteria used to evaluate the significance of each alternative’s impacts on agricultural resources and activities are based on the California Environmental Quality Act (CEQA) Guidelines (Appendix G) (14 CCR 15000 et seq.) and on typical thresholds used to evaluate agricultural impacts in recent EIRs prepared by Sacramento County. Based on these sources, a significant adverse impact could occur if the alternative would:

1. Convert more than 50 acres of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Grazing Land, or areas containing prime soils to uses not conducive to agricultural production;
2. Conflict with an existing Williamson Act contract; or
3. Introduce incompatible uses in the vicinity of existing agricultural uses.

The CEQA Guidelines (Appendix G) (14 CCR 15000 et seq.) does not provide suggested criteria for evaluating a beneficial effect. The following criteria were developed by the lead agencies. A beneficial impact could occur if the alternative would:

1. Restore more than 50 acres of agricultural production in areas containing prime soils;
2. Reduce or eliminate a conflict with an existing Williamson Act contract; or
3. Reduce or eliminate incompatible uses in the vicinity of existing agricultural uses.

The impact analysis for the three EIS/EIR alternatives will consider the context, intensity, and severity of potential impacts to each of these agricultural resource impact criteria and will present a separate determination of significance for each of these criteria.

6.2.2 No Action/No Project Alternative

The No Action/No Project Alternative is described in Section 2.2, No Action/No Project Alternative.

6.2.2.1 Direct and Indirect Effects of the Alternative

Under the No Action/No Project Alternative, future urban development and associated infrastructure would convert approximately 30,570 acres of the approximately 256,832 acres of existing Important Farmland in the Planning Area to non-agricultural uses (Table 6-3). Nearly all of these impacts would be within the UDA. However, as explained in Section 2.2, approximately 1,900 acres of planned urban development would be shifted or displaced to locations outside the UDA under the No Action/No Project Alternative. Conversion (loss) of Important Farmland to a developed land cover type and conflicts between existing agricultural activities and new urban uses would occur on these 1,900 acres of “displaced” urban development.

**Table 6-3. Impacts on Important Farmland Expected Under the No Action/No Project Alternative**

<table>
<thead>
<tr>
<th>Important Farmland Type</th>
<th>Existing Acres within Planning Area</th>
<th>Acres Removed from Agricultural Use Under This Alternative</th>
<th>New Total within Planning Area at the End of Study Period (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prime Farmland</td>
<td>35,819</td>
<td>398</td>
<td>35,421</td>
</tr>
<tr>
<td>Unique Farmland</td>
<td>14,058</td>
<td>742</td>
<td>13,316</td>
</tr>
<tr>
<td>Farmland of Statewide Importance</td>
<td>39,923</td>
<td>6,636</td>
<td>33,287</td>
</tr>
<tr>
<td>Farmland of Local Importance</td>
<td>33,231</td>
<td>7,165</td>
<td>26,066</td>
</tr>
<tr>
<td>Grazing Land</td>
<td>133,801</td>
<td>17,264</td>
<td>116,537</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>256,832</strong></td>
<td><strong>32,205</strong></td>
<td><strong>224,627</strong></td>
</tr>
</tbody>
</table>

Source: CDOC 2014.

1 The Sacramento County General Plan Policies (2011) do not require mitigation for impacts to Grazing Land within the USB according to Policy AG-5. However, these acres are still included in the impact total because they are mapped as Important Farmland.

The effects on agriculture of future urban development within Sacramento County, Galt, and Rancho Cordova were evaluated in the analysis of the General Plan EIRs discussed in Section 3.4 and Section 6.1.1, Federal (Sacramento County 2011; Galt 2009b; Rancho Cordova 2006b).

As discussed in Section 6.2.1, Methodology for Assessing Impacts of Each Alternative on Agricultural Resources, the relevant analyses from each of these EIRs are summarized and incorporated by reference into the analysis of the No Action/No Project Alternative.
Figure 6-2  Williamson Act Lands
The impact analysis presented in the Final Environmental Impact Report: Sacramento County General Plan Update (Sacramento County General Plan EIR) (Sacramento County 2010) determined the following within Sacramento County:

- Future development within Sacramento County would result in conversion of 8,645 acres of Important Farmland,[d] beyond the level than can be mitigated through in-kind mitigation; this would be a significant and unavoidable adverse impact (Sacramento County 2010, pp. 3-47 to 3-60)
- The encouragement of non-renewal of Williamson Act contracts is considered a significant adverse impact (Sacramento County 2010, pp. 3-47 to 3-60)

The Sacramento County General Plan EIR (Sacramento County 2010) did not address compatibility of designated land uses (e.g., residential) with adjacent agricultural uses.

The impact analysis presented in the City of Galt General Plan Update: 2030 Final EIR (Galt General Plan EIR) (Galt 2009b) determined the following within the Galt sphere of influence (SOI):

- Planned development consistent with the Galt General Plan would convert up to 3,200 acres of Important Farmland, a significant and unavoidable adverse impact (Galt 2009b, pp. 8-25 to 8-28)
- Impacts to any lands under Williamson Act contracts would be less than significant adverse; however, planned development in the Galt SOI would require annexation and re-zoning of parcels under Williamson Act contracts (Galt 2009b, pp. 8-25 to 8-28)
- Impacts associated with introducing incompatible land uses in the vicinity of existing agricultural uses would be less than significant adverse with implementation of the Galt General Plan policies that would protect agricultural uses and establish a green belt (Galt 2009b, pp. 8-25 to 8-28)

The impact analysis presented in the City of Rancho Cordova General Plan Final Environmental Impact Report (Rancho Cordova General Plan EIR) (Rancho Cordova 2006b) determined the following within Rancho Cordova:

- Conversion of most if not all of the Important Farmlands in the City due to planned development would result in a significant and unavoidable adverse impact (Rancho Cordova 2006b, pp. 4.2-17 to 4.2-24)

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4 As described further in Section 3.4.1, Sacramento County General Plan, the proposed project analyzed within the Sacramento County General Plan EIR assumed development within a designated “Jackson Highway Corridor New Growth Area” that was not a part of the alternative ultimately selected by the County. However, the County is currently processing land use entitlements in the Jackson Highway Corridor, so the referenced conclusions from the proposed project analysis are relevant to the No Action/No Project Alternative.
Urban development would surround the one parcel in the City under a Williamson Act contracts, impeding the ability of the landowner to farm the land according to the Williamson Act contract and potentially violating the contract; this would result in a significant and unavoidable adverse impact (Rancho Cordova 2006b, pp. 4.2-17 to 4.2-24).

Agriculture/urban interface conflicts such as farm equipment and vehicle conflicts on area roadways, potential trespassing and vandalism to active farmlands, and growth pressures on farmland near urban uses in the City would occur resulting in a significant and unavoidable adverse impact (Rancho Cordova 2006b, pp. 4.2-17 to 4.2-24).

As discussed in Section 3.4 and Section 6.1.3, Local, the three General Plan EIRs used different study periods ending in 2030 (Galt 2009b), in 2030 (Rancho Cordova 2006b), and 2050 (Sacramento County 2010). However, the 50-year study period for this EIS/EIR ends in 2065 (Section 3.6.3, EIS/EIR Study Period). Therefore, additional urban development can be expected to occur within Galt, Rancho Cordova, and Sacramento County in the years after their General Plan EIR study periods end and when this EIS/EIR’s study period ends in 2065. Therefore, the impact analyses and conclusions incorporated from the three General Plan EIRs may not have considered all of the future urban development that is included in the project description of each EIS/EIR alternative. Consequently, when determining the significance of each impact described in the EIS/EIR, the lead agencies considered the impact analysis and the conclusions incorporated by reference from the General Plan EIRs, along with the effects of all urban development activities and projects included in the description of each EIS/EIR alternative.

The conversion of Important Farmlands to developed uses would contribute further to the already significant, unavoidable indirect adverse impacts to agricultural resources from new incompatible uses described in the environmental documents for the General Plans of Sacramento County, Galt, and Rancho Cordova. The description of the No Action/No Project Alternative (Section 2.2) assumes that project compliance with the existing General Plan policies, such as Sacramento County General Plan Policies AG-5 and AG-25 and Rancho Cordova General Plan Policy LU.1.9, as well as compliance with existing agricultural protection ordinances identified in Section 6.1.1, Regulatory Framework, would continue under the No Action/No Project Alternative, and these local policies and ordinances would reduce but not eliminate indirect impacts related to incompatible land uses.

As explained in Section 2.2.2, under the No Action/No Project Alternative, mitigation for impacts to listed species or aquatic resources from new urban development that cannot be avoided would continue to require avoidance, minimization, and compensatory mitigation. As discussed in Section 2.2.2, project Clean Water Act Section 404 compensatory mitigation and/or federal Endangered Species Act and California Endangered Species Act mitigation under the No Action/No Project Alternative could include purchase of credits in existing mitigation banks,
payment of in-lieu fees, and establishment of on-site or off-site preserves by the Permittees. High-priority locations for project mitigation preserves would include sites that have soils and hydrology that support vernal pools or that include riparian areas. These high-priority mitigation sites could contain Important Farmland or be under active Williamson Act contracts. However, mitigation preserves would not result in the loss of farmland or farming activities to developed uses, but instead, change how the land is used (e.g., fallow versus active farming). Therefore, including agricultural lands within mitigation preserves, including Important Farmland agricultural lands, would not require mitigation under existing Sacramento County, Galt, or Rancho Cordova policies. Potential impacts from allowing incompatible uses to be developed adjacent to existing agricultural lands would be mitigated, if necessary, through compliance with applicable Sacramento County, Galt, or Rancho Cordova General Plan policies.

On-site or off-site mitigation preservation could also include foraging habitat for species such as Swainson’s hawk (*Buteo swainsoni*) or greater sandhill crane (*Grus canadensis*). As discussed in Chapter 9, Special-Status Species Including HCP Covered Species, habitat for these species includes open fields that contain row or field crops and grazing land. Species conservation easements on these agricultural lands may include restrictions that limit the type of crops grown or harvest times to ensure appropriate species habitat is preserved within the conservation easement. Conservation easements proposed on lands under existing Williamson Act contracts would be reviewed to ensure the terms of the contract do not conflict with the language of the conservation easement. Therefore, any limitation on types of crops and/or harvest times that are included in a new conservation easement would not result in significant adverse effects to Important Farmland or Williamson Act contracts.

Therefore, under the No Action/No Project Alternative, habitat re-establishment/establishment would not result in *No Impact* to agricultural operations.

6.2.2.2 Cumulative Effects of the No Action/No Project Alternative

As discussed in Section 3.7.1, Past and Present Actions in the Planning Area, and Section 6.2.1, past and present urban development and associated infrastructure project and activities in the EIS/EIR Planning Area have replaced much of the land historically used for agricultural production, especially within the UDA portion of the EIS/EIR Planning Area. Other developing areas within the study area (see Section 6.2.1) such as the Cities of Davis, El Dorado Hills, Yuba City, and Wheatland have also replaced formerly productive agricultural lands with urban development land covers.

Reasonably foreseeable future projects in the EIS/EIR Planning Area that could remove Important Farmland include expansion of Rancho Murieta development, urban development in the Elk Grove SOI, development of the Wilton Rancheria Casino, and construction of the
California High-Speed Rail and the California WaterFix projects (Section 3.7.2, Reasonably Foreseeable Other Actions). Outside the EIS/EIR Planning Area in the remainder of the study area, SACOG (2016) projects that urban development, rural residential development, and transportation projects have the potential to impact 2,466 acres of Prime Farmland, 746 acres of Unique Farmland, and 2,243 acres of Farmland of Statewide Importance for a combined potential impact to 5,455 acres of FMMP-designated farmland.

To address the loss of farmland, many state and local laws and requirements to protect farmland resources have been enacted (see Section 6.1.1). In Sacramento County, these requirements prescribe actions such as a 1:1 replacement for projects that convert more than 50 acres of Important Farmland and the encouragement to support the Williamson Act program to ensure a temporary protection of farmland resources. Based on Sacramento County General Plan Policy AG-5 (Sacramento County 2011), each conversion of less than 50 acres of Important Farmland as part of present and reasonably foreseeable actions would be considered a less-than-significant adverse impact not requiring mitigation. However, the cumulative effects of multiple conversions of less than 50 acres of Important Farmland would be cumulatively significant. Significant adverse cumulative effects from current and reasonably foreseeable future activities would be identified and mitigated according to General Plan policies. However, even with these policies in place, as indicated in the incorporated impact analysis from the General Plan EIRs for Sacramento County (2010), Galt (2009b), and Rancho Cordova (2006b), the cumulative effects of planned urban growth on existing Important Farmlands would result in a cumulatively significant and unavoidable adverse impact on agriculture resources.

Under the No Action/No Project Alternative, approximately 1,900 acres of planned urban development is expected to be shifted or displaced to locations outside the UDA. The areas expected to receive this urban development include south of the Elk Grove SOI and near Rancho Murieta. These components of the No Action/No Project Alternative would further increase conflicts with land use plans and make a cumulatively considerable (i.e., significant) contribution to the cumulatively significant and unavoidable adverse impact to agriculture that was identified in the General Plan EIRs for Sacramento County (2010), Galt (2009b), and Rancho Cordova (2006b). Therefore, the No Action/No Project Alternative would result in a significant and unavoidable adverse cumulative effect to agricultural resources and agricultural activities.

### 6.2.3 Proposed Action/Proposed Project Alternative

The Proposed Action/Proposed Project Alternative is described in Section 2.3, Proposed Action/Proposed Project Alternative.
6.2.3.1 Direct and Indirect Effects of the Proposed Action/Proposed Project Alternative

Under the Proposed Action/Proposed Project Alternative, Covered Activity projects and activities would convert approximately 31,105 acres of the approximately 256,832 acres of Important Farmland in the Planning Area to non-agricultural uses (Table 6-4). As discussed in Section 2.3, nearly all of these effects would be within the UDA. Of the approximately 31,105 acres of Important Farmland that would be converted to a non-agricultural use under the Proposed Action/Proposed Project Alternative, approximately 4,799 acres are under an active Williamson Act contract.

The remainder of Important Farmland in the Planning Area, including approximately 225,727 acres outside the UDA, would not be adversely affected by the Proposed Action/Proposed Project Alternative, including 9,642 acres of Cropland and Irrigated Pasture-Grassland that would be conserved as part of the SSHCP Preserve System (see the following text).

<table>
<thead>
<tr>
<th>Important Farmland Type</th>
<th>Existing Acres within Planning Area</th>
<th>Acres Removed from Agricultural Use Under this Alternative</th>
<th>New Total within Planning Area at End of Study Period (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prime Farmland</td>
<td>35,819</td>
<td>275</td>
<td>35,544</td>
</tr>
<tr>
<td>Unique Farmland</td>
<td>14,058</td>
<td>1,004</td>
<td>13,054</td>
</tr>
<tr>
<td>Farmland of Statewide Importance</td>
<td>39,923</td>
<td>6,049</td>
<td>33,874</td>
</tr>
<tr>
<td>Farmland of Local Importance</td>
<td>33,231</td>
<td>7,743</td>
<td>25,488</td>
</tr>
<tr>
<td>Grazing Land¹</td>
<td>133,801</td>
<td>16,035</td>
<td>117,766</td>
</tr>
<tr>
<td>Total</td>
<td>256,832</td>
<td>31,105</td>
<td>225,727</td>
</tr>
</tbody>
</table>

Source: CDOC 2014.

¹ The Sacramento County General Plan (Sacramento County 2011) does not require mitigation for impacts to Grazing Land within the USB according to Policy AG-5. However, these acres are still included in the impact total because they are mapped as Important Farmlands.

As described in Section 2.3, the Proposed Action/Proposed Project Alternative would allow urban development Covered Activities within the Mather Core Recovery Area portion of the UDA to be implemented consistently with the approved Sacramento County and Rancho Cordova General Plans without urban development shifting or being displaced to locations outside the UDA. As a result, Important Farmland converted to urban uses outside the UDA would be less under the Proposed Action/Proposed Project Alternative than under the No Action/No Project Alternative. Therefore, the Proposed Action/Proposed Project Alternative would have a Minor Beneficial effect on agricultural resources and activities compared to the No Action/No Project Alternative baseline condition.
As indicated in Section 2.3, under the Proposed Action/Proposed Project Alternative, cropland conservation easements or preserves would be established to allow for continued agricultural production on areas that provide foraging and nesting habitat for several Covered Species, including Swainson’s hawk, white-tailed kite (*Elanus leucurus*), and greater sandhill crane.

The Proposed Action/Proposed Project Alternative would preserve approximately 9,642 acres of Cropland and Irrigated Pasture-Grassland under conservation easements or in-fee titles from willing sellers (as part of the approximately 36,038 acres of natural land covers included within the Preserve System). The protected Cropland and Irrigated Pasture-Grassland would generally be located outside the UDA and west of State Route 99 in the Cosumnes River floodplain. Avoidance and Minimization Measure (AMM) EDGE-1 would prioritize compatible adjacent uses next to SSHCP Preserves, such as parks, nature trails, roads, or other uses that would not convert or introduce incompatible land uses or conflict with any existing Williamson Act contracts. Some of the land included within the Preserve System may include Important Farmland or land currently enrolled in a Williamson Act contract; however, establishment of preserves would not convert Important Farmland to developed uses or prevent farmers/ranchers from using their agricultural land for agricultural purposes. Therefore, the Proposed Action/Proposed Project Alternative would have a *Minor Beneficial* effect to agriculture resources and agricultural activities relative to the No Action/No Project Alternative baseline condition. Further, under the Proposed Action/Proposed Project Alternative, the “Right-to-Farm” ordinances and General Plan policies enacted by Sacramento County and Rancho Cordova (described in Section 6.1.1) would also still apply and protect agricultural operations from indirect effects of urban development and incompatible uses.

Much, if not all, of the Cropland Preserves would include Important Farmland. That would also be true for many acres of other preserve types established under the Proposed Action/Proposed Project Alternative. Similarly, many of the areas protected under conservation easement or in fee-title preserves would be under a Williamson Act contract. Each Williamson Act contract is unique, and some may restrict the possible terms allowed for a conservation easement. If a conservation easement were proposed for land that is in a Williamson Act contract, the future Permittees would review the specifics of the Williamson Act contract to ensure that the establishment of a conservation easement is allowable.

Cropland Preserves would be established primarily by purchase of conservation easements from willing landowners. The conservation easement would identify the types of crops to provide habitat for Covered Species, timing for harvest, crop rotations, or other measures that benefit targeted Covered Species, as agreed to in the conservation easement purchase and as described in the SSHCP document. Active agricultural lands placed under a conservation easement would be kept in active agricultural use. Management plans would be developed.
with landowners and would be periodically reviewed, which could provide landowners the opportunity to adaptively manage land management activities.

Of the Important Farmland included in the proposed SSHCP Preserve System, a substantial amount would be located on lands that the state’s FMMP designates as Grazing Land (CDOC 2013, 2014). Generally, grazing on SSHCP Preserves would continue because grazing is beneficial for the Vernal Pool Ecosystem (see Chapter 8, Natural Land Cover Habitat Types and Associated Plant and Animal Communities). Existing grazing leases or licenses on the properties that become part of the SSHCP Preserve System would remain in effect, and the current grazing regimen would be continued until a Preserve Management Plan (Section 2.3.6, SSHCP Preserve Management and Monitoring Programs) is prepared. The Preserve Management Plan would specify the timing of grazing, how many animals can graze at one time, the duration of grazing, and how much vegetation should be present on a grazed area, and would be reviewed annually with the livestock operator. Therefore, establishment of preserves under the Proposed Action/Proposed Project Alternative would not convert Important Farmland to developed uses or prevent farmers/ranchers from using their agricultural land for agricultural purposes. A small amount of Cropland or Irrigated Pasture-Grassland may be converted to an aquatic resource land cover type from the re-establishment or establishment of Riparian Woodland, Vernal Pools, or Seasonal Wetlands under the Proposed Action/Proposed Project Alternative. Although these changes in land cover type are not considered agricultural conversion under the Sacramento County, Galt, or Rancho Cordova General Plans, under the Proposed Action/Proposed Project Alternative, the change in land cover would be mitigated as a loss of species habitat. Establishment of preserves under the Proposed Action/Proposed Project Alternative would have **No Impact** on agriculture, which is the same for preserves established under the No Action/No Project Alternative baseline condition.

Preservation, re-establishment/establishment, and management of species habitat may result in the expansion (colonization or increased numbers) of some Covered Species. The SSHCP includes a Good Neighbor Program (refer to Chapter 11 in the SSHCP document) that extends Incidental Take Permit coverage for willing participants on any agricultural lands within 0.5 mile of an SSHCP Preserve. Therefore, this would be a **Minor Beneficial** effect to agricultural activities relative to the No Action/No Project Alternative baseline condition.

### 6.2.3.2 Significance of Direct and Indirect Effects

Compared to the No Action/No Project Alternative baseline condition, the Proposed Action/Proposed Project Alternative would result in the following:

- Conversion of approximately 1,100 fewer acres of Important Farmland to non-agricultural uses
• New land uses that conflict with 32 more acres of land that have existing Williamson Act contracts
• Fewer incompatible uses near existing agricultural uses by not displacing 1,900 acres of new urban development to locations outside the UDA
• Fewer incompatible uses near existing agricultural by implementing an AMM that emphasizes placement of compatible uses adjacent to Cropland Preserves

Therefore, after considering the significance of impacts from the Proposed Action/Proposed Project Alternative on all of the agricultural resource impact criteria, the Proposed Action/Proposed Project Alternative would result in \textit{Minor Beneficial} effects to agriculture when compared to the impacts that would occur under the No Action/No Project Alternative baseline condition.

\textbf{6.2.3.3 Cumulative Effects of the Proposed Action/Proposed Project Alternative}

As described in Sections 3.7, past and present urban development projects and activities have resulted in loss of Important Farmland in the study area. The EIRs prepared for the Sacramento County, Galt, and Rancho Cordova General Plans (Sacramento County 2010; Galt 2009b; Rancho Cordova 2006b) concluded that development consistent with these plans would result in significant and unavoidable adverse cumulative impacts to Important Farmland.

Reasonably foreseeable future projects that could remove additional Important Farmland include expansion of the Rancho Murieta development, urban development in the Elk Grove SOI, development of the Wilton Rancheria Casino, and construction of the California High-Speed Rail and the California WaterFix projects. Outside the EIS/EIR Planning Area in the remainder of the study area, SACOG (2016) projects that urban development, rural residential development, and transportation projects have the potential to impact 2,466 acres of Prime Farmland, 746 acres of Unique Farmland, and 2,243 acres of Farmland of Statewide Importance for a combined potential impact to 5,455 acres of FMMP designated farmland.

Present and reasonably foreseeable other projects in the Planning Area would comply with policies of Sacramento County, Galt, and Rancho Cordova described in Section 6.1.1. Those policies are designed to protect agricultural resources and require agencies or project proponents to mitigate for the loss of Important Farmland, which would provide a mechanism to ensure that potential impacts associated with the loss of farmland are appropriately addressed. However, the loss of Important Farmland from past, present, and reasonably foreseeable future projects under the Proposed Action/Proposed Project Alternative would still be considered cumulatively significant adverse, which is the same as the cumulative impact analysis of the No Action/No Project Alternative.
Urban development under the Proposed Action/Proposed Project Alternative would contribute to cumulative impacts by converting 32,060 acres of natural land in the UDA, including areas with Important Farmland. Compared to the No Action/No Project Alternative, the Proposed Action/Proposed Project Alternative would not result in shifting or displacement of new development to areas located outside the UDA, such as south of the Elk Grove SOI where nearly all of the land is currently in agricultural production. In addition, the Proposed Action/Proposed Project Alternative would result in mitigation for all Covered Activity impacts to agricultural lands. Under the No Action/No Project Alternative, existing Sacramento County General Plan Policy AG-5 (Sacramento County 2011) only requires mitigation for loss of agricultural lands for projects converting more than 50 acres of Important Farmland. Therefore, urban development under the Proposed Action/Proposed Project Alternative would have a smaller incremental contribution to cumulative impacts on agriculture and agricultural activities than the No Action/No Project Alternative baseline condition.

Establishment and management of preserves under the Proposed Action/Proposed Project Alternative would not contribute substantially to cumulative effects on agriculture because any changes to existing agricultural operations within SSHCP Preserves would be minor and would not substantially change agricultural use of study area croplands. Further, compared to the No Action/No Project Alternative baseline conditions, the Proposed Action/Proposed Project Alternative would preserve 10,000 acres more of Valley Grassland outside the UDA in perpetuity, and these 10,000 acres would be kept available for grazing.

Because the Proposed Action/Proposed Project Alternative would not result in urban development shifted or displaced to outside the UDA, and would result in more preservation of Important Farmlands and grazing lands as compared to the No Action/No Project Alternative, the Proposed Action/Proposed Project Alternative’s incremental contribution to cumulative impacts on agriculture resources would be less than that described for the No Action/No Project Alternative in Section 6.2.2.2, Cumulative Effects of the No Action/No Project Alternative. Therefore, the Proposed Action/Proposed Project Alternative would have a Minor Beneficial Cumulative effect on agriculture compared to the No Action/No Project Alternative baseline condition.

### 6.2.4 Reduced Permit Term Alternative

The Reduced Permit Term Alternative is described in Section 2.4, Reduced Permit Term Alternative. Section 6.2.4.1, Direct and Indirect Effects of the Alternative, presents separate determinations for each of the adverse and beneficial criterion (listed in Section 6.2.1). Section 6.2.4.2, Significance of Direct and Indirect Effects, weighs all of those separate determinations to present one “bottom-line” determination statement for the significance of the direct and indirect effects of the Reduced Permit Term Alternative on agriculture. Finally, Section 6.2.4.3,
Cumulative Effects of the Reduced Permit Term Alternative, describes the cumulative effects of past, present, and reasonably foreseeable other projects in the cumulative study area, and then considers the incremental contribution made by the Reduced Permit Term Alternative to those cumulative effects.

### 6.2.4.1 Direct and Indirect Effects of the Alternative

Under the Reduced Permit Term Alternative, Covered Activities would convert approximately 30,485 acres of the approximately 256,946 acres of Important Farmland in the Planning Area to non-agricultural uses (Table 6-5). Of the approximately 30,485 acres of Important Farmland that would be converted to a non-agricultural use under the Reduced Permit Term Alternative, approximately 4,900 acres are currently under an active Williamson Act contract.

The remainder of Important Farmland in the Planning Area, including acres of active cropland that would be conserved as part of the Preserve System established during the 30-year permit term, would not be adversely affected by the Reduced Permit Term Alternative.

#### Table 6-5. Impacts on Important Farmland due to Covered Activities under the Reduced Permit Term Alternative

<table>
<thead>
<tr>
<th>Important Farmland Type</th>
<th>Existing Acres within Planning Area</th>
<th>Impacts on Each Farmland Type (acres)</th>
<th>New Total within Planning Area (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Years 1–30</td>
<td>Years 31–50</td>
</tr>
<tr>
<td>Prime Farmland</td>
<td>35,731</td>
<td>237</td>
<td>83</td>
</tr>
<tr>
<td>Unique</td>
<td>14,060</td>
<td>274</td>
<td>464</td>
</tr>
<tr>
<td>Farmland of Statewide Importance</td>
<td>39,998</td>
<td>1,280</td>
<td>4,746</td>
</tr>
<tr>
<td>Farmland of Local Importance</td>
<td>33,316</td>
<td>4,751</td>
<td>2,167</td>
</tr>
<tr>
<td>Grazing Land¹</td>
<td>133,841</td>
<td>9,570</td>
<td>6,912</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>256,946</strong></td>
<td><strong>16,113</strong></td>
<td><strong>14,372</strong></td>
</tr>
</tbody>
</table>

Source: CDOC 2014.

¹ The Sacramento County General Plan (Sacramento County 2011) does not require mitigation for impacts to Grazing Land in the USB according to Policy AG-5. However, these acres are still included in the impact total because they are mapped as Important Farmland.

Under the Reduced Permit Term Alternative, approximately 896 acres more of natural land covers within in the Mather Core Recovery Area would be directly impacted, and 597 acres more of direct impacts to natural land covers in the UDA outside the Mather Core Recovery Area compared to the No Action/No Project Alternative would occur. As described in Section 2.4, the Reduced Permit Term Alternative would allow urban development Covered Activities within the Mather Core Recovery Area portion of the UDA to be implemented consistent with the approved Sacramento County and Rancho Cordova General Plans, without urban development shifting or being displaced to locations outside the UDA. As a result, acres of Important Farmland...
changed to urban development would be less under the Reduced Permit Term Alternative as compared to the No Action/No Project Alternative. Therefore, the Reduced Permit Term Alternative would have a Minor Beneficial effect on Important Farmland as compared to the impacts of the No Action/No Project Alternative baseline condition.

Under the Reduced Permit Term Alternative, the “Right-to-Farm” ordinances and General Plan policies enacted by Sacramento County and Rancho Cordova (described in Section 6.1.1) would apply and would protect agricultural operations from indirect effects of urban development during the EIS/EIR 50-year study period, including the 30-year permit term of the Reduced Permit Term Alternative. Additional protections for agricultural operations would be provided by the Reduced Permit Term Alternative during the 30-year permit term by AMM EDGE-1, which would limit incompatible uses adjacent to Cropland Preserves. This would be a Minor Beneficial impact No Impact to agricultural resources and agricultural activities relative to the No Action/No Project Alternative.

Much, if not all, of the Cropland Preserves would include Important Farmland. That would also be true for many acres of other preserve types established under the Reduced Permit Term Alternative. Similarly, many of the areas protected under conservation easement or in fee-title preserves would be under a Williamson Act contract. Each Williamson Act contract is unique, and some may restrict the possible terms allowed for a conservation easement. If a conservation easement were proposed for land that is in a Williamson Act contract, the future Permittees would review the specifics of the Williamson Act contract to ensure that the establishment of a conservation easement is allowable.

Of the Important Farmland included in the Reduced Permit Term Alternative’s Preserve System, a substantial amount would be located on lands that the state’s FMMP designates as Grazing Land (CDOC 2013, 2014). This would include the large landscape-scale preserve outside the UDA. Generally, grazing on SSHCP Preserves would continue because grazing is beneficial for the Vernal Pool Ecosystem (see Chapter 8). Existing grazing leases or licenses on the properties that receive conservation easements or are purchased in fee-title for SSHCP Preserves would remain in effect, and the current grazing regime would be continued until a management plan was prepared for the preserve. The Preserve Management Plan would specify the timing of grazing, how many animals can graze at one time, the duration of grazing, and how much vegetation should be present on a grazed area, and would be reviewed annually with the livestock operator. Therefore, establishment of preserves under the Reduced Permit Term Alternative would not convert Important Farmland to developed uses or prevent farmers/ranchers from using their agricultural land for agricultural purposes.

Cropland Preserves established during the 30-year permit term would be in large blocks to allow for continued agricultural production and would be protected through purchase of conservation
easements or fee-title purchases from willing sellers. Cropland Preserves established during the 30-year permit term (as part of the approximately 30,646 acres of natural land covers included within the Preserve System during the permit term) would include approximately 11,334 acres of row crops and Irrigated Pasture-Grassland. The Cropland Preserves would be almost entirely outside the UDA.

As outlined in Section 2.4.3, Covered Activities/Projects Under the Reduced Permit Term Alternative, after the 30-year permit term expires, mitigation preserves would continue to be established on a project-by-project basis as project mitigation for impacts to aquatic resources or listed species. It is expected that Cropland Preserves established after the end of the 30-year permit term (during Years 31–50 of the EIS/EIR 50-year study period) would comply with Sacramento County’s Swainson’s hawk ordinance to mitigate project effects on Swainson’s hawk habitat. During Years 31–50 of the EIS/EIR 50-year study period, Sacramento County’s agricultural protection ordinance (Section 6.1.2) would also continue to require that impacts to Important Farmland be mitigated by preserving Important Farmlands, preferably outside the USB boundary, when more than 50 acres are impacted by a project.

AMM EDGE 1 would prioritize compatible adjacent uses next to SSHCP Preserves, such as parks, nature trails, roads, or other uses that would not convert or introduce incompatible land uses or conflict with any existing Williamson Act contracts. Some of the land included within the Preserve System may include important farmland or land currently enrolled in a Williamson Act contract; however, establishment of preserves would not convert Important Farmland to developed uses or prevent farmers/ranchers from using their agricultural land for agricultural purposes. Therefore, establishment of preserves under the Reduced Permit Term Alternative would have **No Impact** on agriculture compared to the No Action/No Project Alternative baseline condition.

Preservation, re-establishment/establishment, and management of species habitat may result in the expansion (colonization or increased numbers) of some Covered Species. As in the Proposed Action/Proposed Project Alternative, the Reduced Permit Term Alternative would include a Good Neighbor Program (refer to Chapter 11 in the SSHCP document) that extends Incidental Take Permit coverage for willing participants for any agricultural lands within 0.5 mile of an SSHCP Preserve. Therefore, this would be a **Minor Beneficial** effect to agricultural activities relative to the No Action/No Project Alternative baseline condition.

### 6.2.4.2 Significance of Direct and Indirect Effects

In summary, when compared to the No Action/No Project Alternative baseline condition, the Reduced Permit Term Alternative would result in the following:

- Conversion of approximately 1,720 fewer acres of Important Farmland to non-agricultural uses
• Land uses that conflict with 133 more acres of land with existing Williamson Act contracts
• Fewer incompatible uses near existing agricultural uses by not displacing development outside the UDA and by implementing an AMM during the 30-year permit term that emphasizes placement of compatible uses adjacent to Cropland Preserves

Therefore, after considering the significance of impacts from the Reduced Permit Term Alternative on all of the agricultural resource impact criteria, the Reduced Permit Term Alternative would result in **Minor Beneficial** effects to agriculture compared to the impacts that would occur under the No Action/No Project Alternative baseline condition.

### 6.2.4.3 Cumulative Effects of the Reduced Permit Term Alternative

As described in Section 3.7, past and present urban development projects and activities have resulted in loss of Important Farmland in the agricultural resource study area. The EIRs prepared for the Sacramento County, Galt, and Rancho Cordova General Plans (Sacramento County 2010, Galt 2009b, Rancho Cordova 2006b) concluded that current and future development consistent with these plans would result in significant and unavoidable adverse impacts to Important Farmland (Sacramento County 2010, pp. 3-47 to 3-60; Galt 2009b, pp. 8-25 to 8-28; Rancho Cordova 2006b, pp. 4.2-17 to 4.2-24).

Reasonably foreseeable future projects, not included in the description of this alternative, that could remove additional Important Farmland include expansion of the Rancho Murieta development, urban development in the Elk Grove SOI, development of the Wilton Rancheria Casino, and construction of the California High-Speed Rail and the California WaterFix projects (see Section 3.7.2). SACOG (2016) projects that outside the EIS/EIR Planning Area in the remainder of the study area, urban development, rural residential development, and transportation projects have the potential to impact 2,466 acres of Prime Farmland, 746 acres of Unique Farmland, and 2,243 acres of Farmland of Statewide Importance for a combined potential impact to 5,455 acres of FMMP-designated farmland.

To address the loss of farmland, many state and local laws and requirements to protect farmland resources have been enacted (see Section 6.1.1). For example, in Sacramento County, these requirements prescribe actions such as a 1:1 replacement for projects that convert more than 50 acres of Important Farmland and the encouragement to support the Williamson Act program to ensure a temporary protection of farmland resources. Based on the Sacramento County General Plan Policy AG-5 (2011), each conversion of less than 50 acres of Important Farmland as part of present and reasonably foreseeable actions would be considered a less-than-significant adverse impact not requiring mitigation. However, the cumulative effects of multiple conversions of less than 50 acres of Important Farmland would be cumulatively significant. Significant adverse cumulative effects from current and reasonably foreseeable
future activities would be identified and mitigated according to General Plan policies. However, even with these policies in place, the cumulative effects of past, present, and reasonably foreseeable other projects on existing Important Farmland would result in a cumulatively significant adverse impact on agriculture resources.

Urban development under the Reduced Permit Term Alternative would contribute to cumulative impacts by converting approximately 35,367 acres of natural land, including areas with Important Farmland. Compared with the No Action/No Project Alternative, the Reduced Permit Term Alternative would not result in shifting or displacement of development to areas located outside the UDA, such as south of the Elk Grove SOI where nearly all of the land is currently in agricultural production. In addition, the Reduced Permit Term Alternative would result in mitigation for any Covered Activity impacts to agricultural lands during the 30-year permit term. Under the No Action/No Project Alternative, existing Sacramento County General Plan Policy AG-5 (2011) only requires mitigation for loss of agricultural lands for projects converting more than 50 acres of Important Farmland. Therefore, urban development under the Reduced Permit Term Alternative would have a smaller incremental contribution to cumulative impacts on agriculture and agricultural activities than the No Action/No Project Alternative baseline condition.

Establishment and management of mitigation lands, preserves, and open space under the Reduced Permit Term Alternative would not contribute substantially to cumulative effects on agriculture because the minor restrictions on agricultural operations within SSHCP Cropland Preserves would not substantially change agricultural use of Planning Area croplands. Further, under the Reduced Permit Term Alternative, more than 22,014 acres of Valley Grassland outside the UDA would be preserved during the 30-year permit term in perpetuity and kept available for grazing in compliance with an approved Preserve Management Plan.

Because the Reduced Permit Term Alternative would avoid urban development outside the UDA and increase preservation of Important Farmland and grazing lands compared to the No Action/No Project Alternative, the Reduced Permit Term Alternative’s contribution to cumulative impacts on agriculture would also be less than that described for the No Action/No Project Alternative. Thus, the Reduced Permit Term Alternative would have a Minority Beneficial Cumulative effect to agriculture compared to the cumulative impact analysis of the No Action/No Project Alternative baseline condition.

6.3 REFERENCES CITED


