

AGRICULTURAL RESOURCES

4.2 AGRICULTURAL RESOURCES

This chapter of the Draft Environmental Impact Report (EIR) describes the potential impacts to agricultural resources associated with the adoption and implementation of the proposed project. This chapter describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential impacts to agricultural resources, and identifies proposed General Plan 2050 goals, actions, and policies, as well as feasible mitigation measures, that would minimize any potentially significant impacts. As described in Section 4.2.2, *Standards of Significance*, there is no qualifying forest land or timberland production in the EIR Study Area, and therefore, no evaluation of forestry resources is required.

4.2.1 ENVIRONMENTAL SETTING

4.2.1.1 REGULATORY FRAMEWORK

State Regulations

Farmland Mapping and Monitoring Program

Within the California Natural Resources Agency, the State Department of Conservation provides technical services and information to promote informed land use decisions and sound management of the state's natural resources. As part of this duty, the Department of Conservation manages the Farmland Mapping and Monitoring Program (FMMP), which supports agriculture throughout California by developing maps and statistical data for analyzing land use impacts to farmland. The FMMP publishes a field report for each county about every two years. The FMMP categorizes land by agricultural production potential according to the following classifications:¹

- **Prime Farmland** has the best combination of physical and chemical features able to sustain long-term agricultural production. Prime farmland has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agriculture production at some time during the four years prior to the mapping date.
- **Farmland of Statewide Importance** is similar to Prime Farmland, but with minor shortcomings, such as steeper 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** consists 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 farmed at some time during the four years prior to the mapping date.

¹ State of California Department of Conservation, 2022, Important Farmland Categories, <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx>, accessed April 5, 2022.

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- **Farmland of Local Importance** consists of all farmable land not meeting the definitions of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. This includes land that is or has been used for irrigated pasture, dryland farming, confined livestock or dairy facilities, aquaculture, poultry facilities, and dry grazing. It also includes soils previously designated by soil characteristics as prime farmland, farmland of statewide importance, and unique farmland that has since become idle.
- **Grazing Land** is the land on which the existing vegetation is suited to the grazing of livestock.

Williamson Act

The California Land Conservation Act of 1965, better known as the Williamson Act, conserves agricultural and open space lands through property tax incentives and voluntary restrictive land use contracts administered by local governments under State regulations. Private landowners voluntarily restrict their land to agricultural and compatible open space uses under minimum 10-year rolling term contracts, with counties and cities also acting voluntarily. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use rather than potential market value.

Regional Regulations

Sonoma County General Plan

Sonoma County has a significant agricultural economy and upbringing, with agriculture as one of its leading sectors, boasting a total production value of over 8 million dollars in 2021.² The 2020 Sonoma County General Plan, adopted in 2008, is a comprehensive long-range guide for land in the unincorporated portions of the county, including land directly in the surrounding periphery of the Santa Rosa city limit. While the land within the Santa Rosa city limit is regulated by the City's General Plan, the unincorporated areas outside of the city limit are governed by the County's General Plan. While there are no agricultural land use designations in the Sphere of Influence (SOI), the southern portion of the EIR Study Area outside the SOI and within the Urban Growth Boundary has a diverse agriculture land use designation. The following are relevant goals from the Sonoma County General Plan Agricultural Resources (AR) Element regarding agricultural resources:³

- **Goal AR-2:** Maintain for the timeframe of this plan agricultural production on farmlands at the edges but beyond the Urban Service Areas, to minimize the influence of speculative land transactions on the price of farmland and to provide incentives for long term agricultural use.
- **Goal AG-3:** Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.

² Sonoma County Department of Agriculture/Weights & Measurements, 2022, *2021 Sonoma County Crop Report*, <https://sonomacounty.ca.gov/Main%20County%20Site/Natural%20Resources/Agricultural%2C%20Weights%20%26%20Measures/Documents/Crop%20Reports/2021-Sonoma-County-Crop-Report.pdf>, accessed November 9, 2022.

³ Sonoma County, amended August 2, 2016, *Sonoma County General Plan 2020, Agricultural Resources Element*, https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Archive/Department%20Information/Cannabis%20Program/_Documents/General-Plan-Agricultural-Resources-Element.pdf, accessed October 18, 2022.

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Sonoma LAFCO Agricultural Policies

The Sonoma Local Agency Formation Commission (LAFCO) is an independent agency created by the State to promote the wise use of land resources while providing for the present and future needs of a community. As part of this charge, Sonoma LAFCO establishes agricultural policies and provides guidance to property owners with LAFCO applications who propose the conversion of prime agricultural lands (as defined by LAFCO) into non-agricultural uses. Sonoma LAFCO's main objectives are: (1) To encourage the orderly formation of local government agencies and promote the efficient provision of public services; (2) To preserve agricultural land and open-space resources; and (3) To promote orderly growth and discourage urban sprawl.

Ultimately, Sonoma LAFCO is responsible for determining any changes to a city's boundaries and or a city's SOI. Objective I.A of the Sonoma LAFCO policies is that prime agricultural land is protected and conserved while ensuring there are adequate areas for efficient and orderly growth. Policies under this objective include the following:

- **Agricultural Lands.** In addition to considering the policies and priorities set forth in Government Code Section 56377, Sonoma LAFCO shall conform to the following policies in reviewing and approving or disapproving proposals that may result in the conversion of agricultural land to non-agricultural uses:⁴
 1. Agricultural significance of the subject territory and adjacent areas relative to other agricultural lands in the region.
 2. Use of the subject territory and adjacent areas.
 3. Whether public facilities for proposed development would be a) sized or situated so as to facilitate conversion of adjacent or nearby agricultural land, or b) extended through agricultural lands that lie between the project site and existing facilities.
 4. Whether uses incompatible with adjacent agricultural uses are expected to result from the proposal and whether natural or man-made barriers would buffer adjacent or nearby agricultural lands from the effects of proposed development or other incompatible uses.
 5. Whether the subject territory is located within the sphere of influence of a city or district providing sewer and/or water service or within an "Urban Service Boundary" designation of the Sonoma County General Plan.
 6. Provisions of applicable general plan open space and land use elements, growth management policies, or other statutory provisions designed to protect agriculture.

The Sonoma LAFCO shall discourage proposals which would likely convert to urban uses those lands identified by the County General Plan as suitable for long-term agricultural or open space use or identified by the Sonoma County Agricultural Preservation and Open Space District Acquisition Plan as a priority for acquisition or protection in cooperation with willing landowners.

⁴ Sonoma Local Agency Formation Commission, amended June 5, 2013, Policy: Agricultural Lands, <https://sonomalafco.org/about-the-commission/procedures-and-guidelines/policies-and-guidelines/policy-agricultural-lands>, accessed on October 18, 2022.

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- **Territory Subject to Williamson Act Agricultural Preserve Contract.** Proposals establishing or amending spheres of influence and/or annexations for territory to a city or district providing sewers or nonagricultural water or cities, with an existing Williamson Act Agricultural Preserve Contract shall be prohibited, unless these facilities or services benefit land uses that are allowed under the contract and the landowner consents.⁵

Pursuant to Government Code Section 56426.5, Sonoma LAFCO may approve the inclusion of territory subject to the Agricultural Preserve Contract within the sphere of influence of a city or special district able to provide sewers or nonagricultural water if it complies with all of the following criteria:

1. Territory that is subject to a contract for which a notice of nonrenewal has been served pursuant to Section 51245 and has less than five (5) years remaining in the term of the contract.
2. Territory that is subject to a contract for which a tentative cancellation has been approved pursuant to Section 51282 and has less than five (5) years remaining in the term of the contract.

Territory for which the governing body of the county or city administering the contract has given its written approval to the change and the landowner consents to the change and has less than five (5) years remaining in the term of the contract.

Local Regulations

Santa Rosa City Code

The Santa Rosa City Code (SRCC) includes various directives to minimize adverse impacts to agricultural resources in Santa Rosa. The SRCC is organized by title, chapter, and section, and in some cases, articles. Most provisions related to agricultural resources are in Title 20, *Zoning*, as follows:

- **Chapter 20-26, *Special Purpose Zoning Districts*.** This chapter of the Zoning Code lists the land uses that may be allowed within the Special Purpose zoning districts. Special Purpose Zoning Districts include Open Space–Recreation (OSR), Open Space–Conservation (OSC), Public and Institutional (PI), and Planned Development (PD) districts. The OSC zoning district is applied to important open space areas of the City including agricultural land. Section 20-26.030, *Special purpose district land uses and permit requirements*, allows for agricultural-based uses in the OSR and OSC zoning districts through conditional use permits.

4.2.1.2 EXISTING CONDITIONS

Regional Agriculture

Agricultural commodities in Sonoma County grossed over \$800 million in 2021, a 19 percent increase from 2020. Wine grapes has been the top-valued agricultural commodity in the county for many years, with a 2021 value of over \$540 million. Other top-valued crops in Sonoma County, in order of value, are

⁵ Sonoma Local Agency Formation Commission, amended May 2013, Policy: Territory Subject to Williamson Act Agricultural Preserve Contract, <https://sonomalafo.org/about-the-commission/procedures-and-guidelines/policies-and-guidelines/policy-territory-subject-to-williamson-act-agricultural-preserve-contract>, accessed on October 18, 2022.

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milk, nursey plants, miscellaneous livestock and poultry products, cattle and calves, vegetables, cut flowers, bedding plants, and sheep and lambs.⁶ The growing population in the EIR Study Area and in greater Sonoma County has increased the rate of agricultural land conversion since the 1980s. As indicated in Table 4.2-1, *Sonoma County Agricultural Land Conversion 1984 to 2018*, the acreages for Prime Farmland and Farmland of Local Importance have decreased by 11 and 29 percent, respectively.

TABLE 4.2-1 SONOMA COUNTY AGRICULTURAL LAND CONVERSION 1984 TO 2018

Land Use Category	1984 Acreage	2018 Acreage	1984 to 2020 Net Acreage Changed	Percentage Change
Prime Farmland	33,930	30,339	-3,591	-11%
Farmland of Statewide Importance	11,318	17,782	6,464	57%
Unique Farmland	15,797	34,455	18,658	118%
Farmland of Local Importance	112,094	79,226	-32,869	-29%
Grazing Land	454,851	414,992	-39,859	9%

Source: California Department of Conservation, 2023, Historic Land Use Conversion, <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Sonoma.aspx>, accessed May 15, 2023.

Important Farmland

While the majority of land within the city limit is urban and built-up land, land use for agricultural purposes is in the EIR Study Area. The EIR Study Area includes a variety of California Important Farmland, including Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland, as classified by the Department of Conservation and shown on Figure 4.2-1, *Important Farmlands and Williamson Act Contracts*. Table 4.2-2, *Important Farmland by Acreage in the EIR Study Area*, lists the number of acres associated with each farmland classification. Most of the Important Farmlands in the EIR Study Area are Grazing Land and Farmland of Local Importance.

TABLE 4.2-2 IMPORTANT FARMLAND BY ACREAGE IN THE EIR STUDY AREA

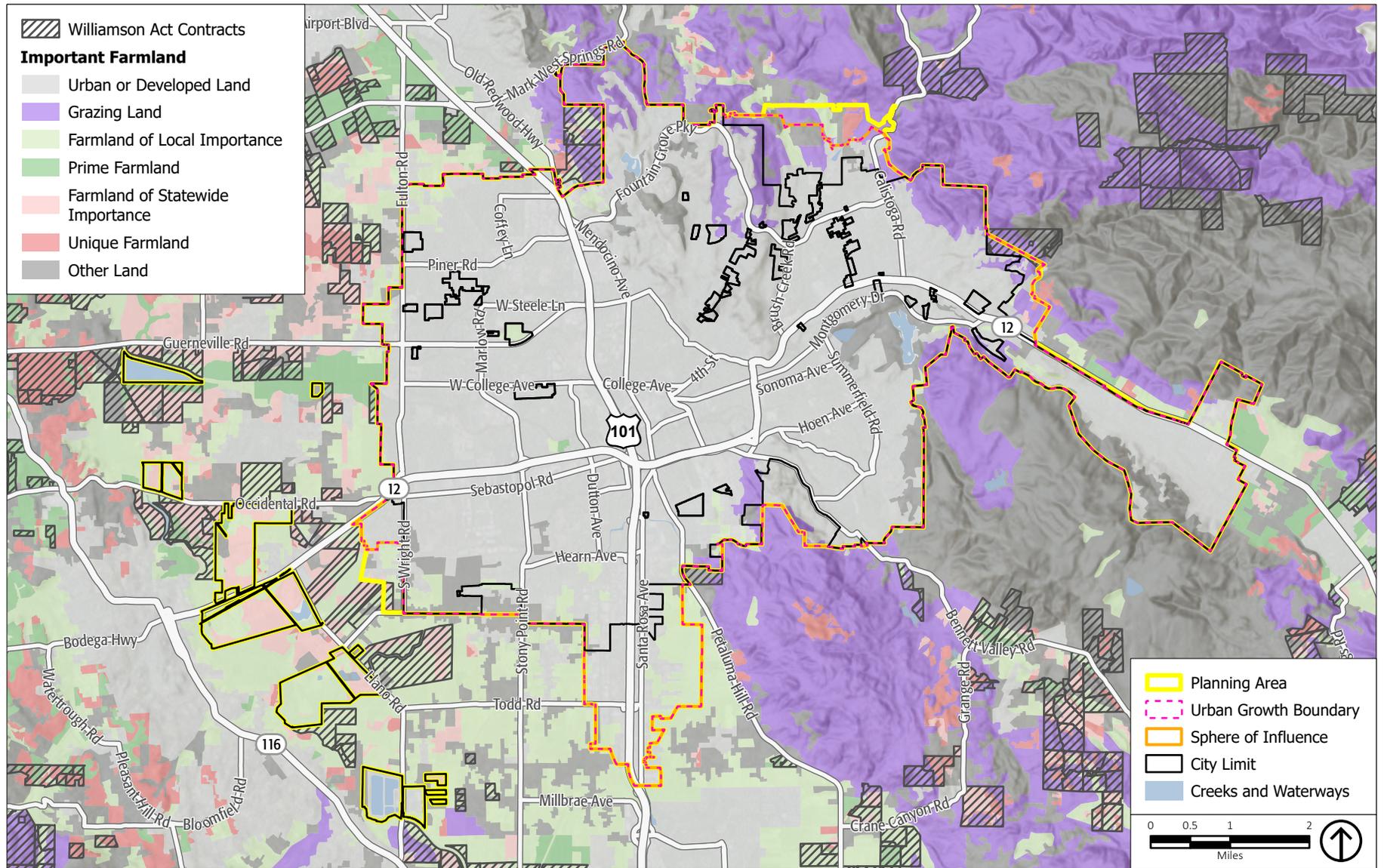
	Acres		
	City Limit	Sphere of Influence/Urban Growth Boundary	EIR Study Area Total ^a
Prime Farmland	41	0	43
Farmland of Statewide Importance	627	8	660
Farmland of Local Importance	1,455	613	2,194
Unique Farmland	2	5	54
Grazing Land	1,421	500	2,051
Total Acres	3,587	1,070	5,002

Source: Department of Conservation, Farmland Mapping and Monitoring Program GIS data, 2018.

a. Totals may not match City Limit + Sphere of Influence as the EIR Study Area includes the Planning Area, which is not entirely encompassed by the City Limit and Sphere of Influence.

⁶ Sonoma County Department of Agriculture/Weights & Measurements, *2021 Sonoma County Crop Report*, <https://sonomacounty.ca.gov/Main%20County%20Site/Natural%20Resources/Agricultural%20Weights%20Measures/Documents/Crop%20Reports/2021-Sonoma-County-Crop-Report.pdf>, accessed November 9, 2022.

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Source: DOC, 2018; City of Santa Rosa, 2020; ESRI, 2022; PlaceWorks, 2024.

Figure 4.2-1
Important Farmland and Williamson Act Contracts

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Sonoma County Agricultural Preservation and Open Space District

Sonoma County Agricultural Preservation and Open Space District (District) is a community-created, taxpayer-funded agency that works to permanently protect Sonoma County's diverse agricultural lands, natural resources, and scenic open space for future generations.⁷ The District's primary tool is the conservation easement, a legal agreement between a willing landowner and the agency that permanently limits uses of the land to protect its conservation values. Approximately 1,558 acres of land in the EIR Study Area is protected by the District. The District will consider a proposal for a mitigation-related activity on lands protected with a District-held easement according to the permitted use request review process as described in the Board-adopted District Stewardship Manual.⁸ The District is also eligible to receive funding through public agency grant programs for planning, acquisition, and stewardship of easement or District-owned properties, or other District projects.

Williamson Act Contracts

A Williamson Act contract is an agreement between the property owner and the county that provides the property owner with reduced property taxes in exchange for maintaining the land in commercial agricultural use for a period of 10 years.⁹ There are two types of Williamson Act contracts: Type I for prime agricultural land planted in permanent crops such as grapes, apples, olives, or pears; and Type II for nonprime grazing or open-space lands. The contract is binding on all subsequent property owners. As shown on Figure 4.2-1, there are no active Williamson Act contracts within the city limit but there are a few within the SOI. These are Type II contracts for prime agricultural or open space lands that are primarily used for grazing, hay farming, horse breeding, timber production, open space, or any combination of agricultural and open space uses, including permanent crops. The land under Williamson Act contract in the southeastern portion of the EIR Study Area has a Phase-Out Status. There is a total of 97 acres of land that are under Williamson Act contracts within the EIR Study Area.

Forestry Resources

There are no portions of the EIR Study Area that contain forest or timber resources or are zoned as such. No further discussion of this topic is required.

⁷ Sonoma County Agricultural Preservation and Open Space District, 2023, Land for Life, https://www.sonomaopensespace.org/wp-content/uploads/Brochure_PDF_For_Web.pdf, accessed May 15, 2023.

⁸ Sonoma County Agricultural Preservation and Open Space District, July 18, 2017, Mitigation Policy for District-Protected Lands, https://www.sonomaopensespace.org/wp-content/uploads/Final-District-Mitigation-Policy_20170718.pdf, accessed May 15, 2023.

⁹ Sonoma County, updated May 20, 2018, Frequently Asked Questions (FAQs) Agricultural Preserves Phase Out of Substandard Parcels, <https://permitsonoma.org/regulationsandinitiatives/agriculturaluses/faqsagriculturalpreservesphaseout>, accessed March 3, 2023.

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4.2.2 STANDARDS OF SIGNIFICANCE

The Santa Rosa Zoning Code does not contain a zoning district for forest land or timberland production. Further, there are no State or national forest lands in the EIR Study Area. Consequently, there would be no impacts to forestry resources, and the following standards are not discussed further in this Draft EIR:

- The project would conflict with existing zoning for, or cause rezoning of, forestland (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)).
- The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.

Implementation of the proposed project would result in a significant impact to agricultural resources if it would:

1. 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 non-agricultural use.
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract.
3. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.
4. In combination with past, present, and reasonably foreseeable projects, result in a cumulative impact with respect to agricultural resources.

4.2.3 IMPACT DISCUSSION

AG-1	Implementation of the proposed project could convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
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As shown in Table 4.2-2, the EIR Study Area contains 43 acres of Prime Farmland, 660 acres of Farmland of Statewide Importance, and 54 acres of Unique Farmland. As shown in Table 4.2-3, *Qualifying Farmland Potentially Converted to Other Uses at General Plan Buildout*, with buildout of the proposed project, there could be a reduction of 94 acres of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.

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TABLE 4.2-3 QUALIFYING FARMLAND POTENTIALLY CONVERTED TO OTHER USES AT GENERAL PLAN BUILDOUT

Farmland Classification	Existing Acres	Future Acres	
	EIR Study Area	Potential to be Converted	Total Acres Remaining at Buildout
Prime Farmland	43	23	20
Farmland of Statewide Importance	660	19	641
Unique Farmland	54	52	2
Total	757	94	663

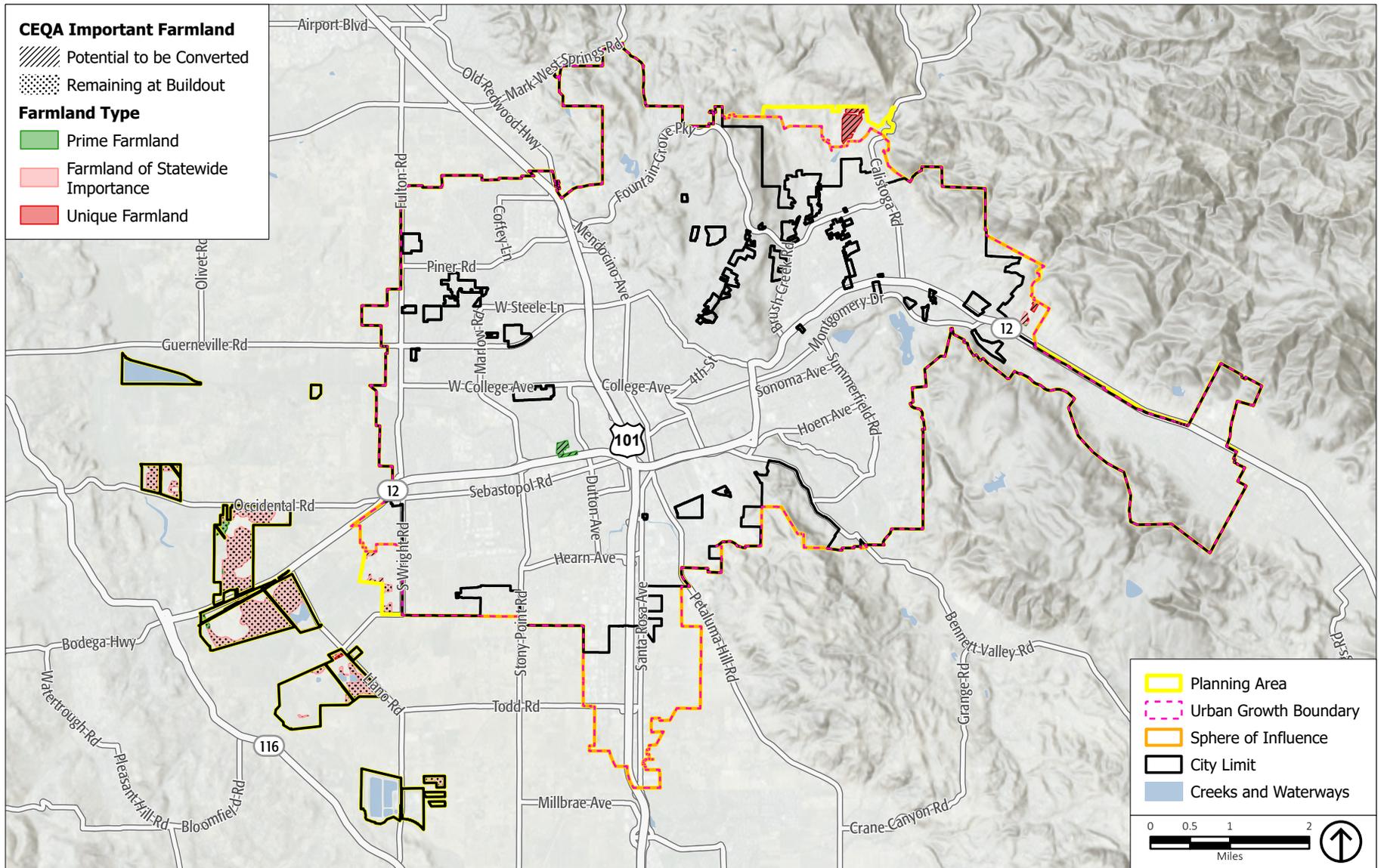
Source: Department of Conservation, Farmland Mapping and Monitoring Program GIS data, 2018.

The proposed General Plan 2050 would retain approximately 1,520 acres of land designated for agricultural use within the EIR Study Area, as well as 245 acres of land designated for open space. This land consists of approximately 20 acres of Prime Farmland, 641 acres of Farmland of Statewide Importance, and 2 acres of Unique Farmland that would not be developed over the buildout horizon of the proposed project. Therefore, for the purposes of this analysis, it is assumed that the remaining 94 acres of qualified farmland within the EIR Study Area could be converted to nonagricultural uses by 2050, as shown in Table 4.2-3. Because the standard of significance is the loss of any qualifying farmlands (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance), any conversion of the 94 acres or qualifying farmlands to non-agricultural lands would constitute a significant impact under the California Environmental Quality Act (CEQA). Figure 4.2-2, *CEQA Important Farmland*, depicts areas where qualifying farmlands would have the potential to be converted under the proposed projects and areas of remaining qualifying farmlands would at buildout.

Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*, of the proposed General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider impacts to agricultural resources. The following goal, policies, and actions would serve to minimize impacts related to the loss of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland:

- **Goal 3-6:** Use nature- and science-based strategies to preserve and create environments that provide ecosystem benefits.
 - **Policy 3-6.6:** Conserve agricultural land and soils.
 - **Action 3-6.16:** Discourage the conversion of agricultural land to non-agricultural uses.
 - **Action 3-6.17:** Promote restorative agricultural and landscaping techniques that incorporate cover crops, mulching, compost application, field borders, alley cropping, conservation crop rotation, prescribed grazing, and reduced tillage to promote healthy soils and soil conservation.
 - **Action 3-6.19:** Partner with the Sonoma County Agricultural Preservation and Open Space District and Sonoma Resource Conservation District to identify opportunities for conserving agricultural lands and preserving soil quality in Santa Rosa.

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Source: DOC, 2018; City of Santa Rosa, 2020; ESRI, 2022; PlaceWorks, 2024.

Figure 4.2-2
CEQA Important Farmland

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- **Policy 3-6.7:** Support Sonoma County efforts to preserve unincorporated lands adjacent to and near the Santa Rosa UGB as viable agricultural resources and to support the agriculture economy and environmental quality, scenic resources, and a buffer providing greater resilience against hazards.
- **Policy 3-6.8:** Capture and sequester more carbon in soils and plants citywide.
 - **Action 3-6.28:** Ensure that agricultural easements have standards for best management practices and prioritize conservation of agricultural properties that use or agree to implement regenerative agriculture practices.

While the proposed General Plan 2050 goal, policies, and actions identified above would reduce potential impacts related to the conversion of farmland, they would not reduce the amount of acreage converted under buildout of the proposed project since it would designate 94 acres of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance to nonagricultural uses; therefore, a *significant* impact would result.

Impact AG-1: Implementation of the proposed project could result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland land (together referred to as “CEQA Important Farmland”) to non-agricultural land uses.

Mitigation Measures Considered. In compliance with CEQA, “each public agency shall mitigate or avoid the significant effects on the environment of the project it carries out or approves whenever it is feasible to do so.”¹⁰ The term “feasible” is defined in CEQA to mean, “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.”¹¹ CEQA Guidelines Section 15370 defines “mitigation” as: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of an action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and (5) compensating for the impact by replacing or providing substitute resources or environments. The following is a brief discussion of the mitigation measures considered for mitigating or avoiding the impact of the conversion of agricultural lands to other uses and their infeasibility. However, as shown, no feasible mitigation measures are available that would reduce the agricultural resource impact to less-than-significant levels.

- **Replacement of Agricultural Resources.** This measure would replace the existing agricultural use with the same use on other property that is not currently used for agriculture. From a statewide perspective, the replacement of farmland means that there will be no net loss of farmland in the state. However, CEQA Important Farmland would still be developed. There is limited undeveloped land in the EIR Study Area that is not currently designated as agricultural, restricting the amount of agricultural land that would be able to be replaced elsewhere in the area, and thus conversion of these lands would be insufficient to achieve no net loss. Moreover, even if adequate land could

¹⁰ Public Resources Code, Section 21002.1(b).

¹¹ Public Resources Code, Section 21061.1

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be identified to achieve no net loss, the challenges of creating the soil, irrigation, climatic, and economic conditions that are required for productive farmland (i.e., that achieve the same CEQA Important Farmland status) are significant, and there would be no guarantee that replacement land could be successfully farmed. In addition, replacing existing undeveloped areas with active agriculture could trigger a range of negative environmental impacts, including increased groundwater consumption, habitat destruction, erosion, air quality impacts, and herbicide and pesticide application. As such, the replacement of the existing agricultural uses on other properties within the Sphere of Influence is infeasible.

- **Transfer of Development Rights.** Transferring development rights would involve the purchasing of the right to develop land from a currently undeveloped piece of land and transferring those rights to farmland within the city. Thus, this option is also infeasible because there would still be a net loss of farmland (i.e., the farmland preserved would still likely be preserved anyhow). Even if farmland would be preserved elsewhere in Sonoma County, the CEQA Important Farmland in the city would be developed, resulting in a net loss of CEQA Important Farmland. Therefore, for the reasons outlined previously, and in this paragraph, it would not prevent significant impacts from occurring in the city and it would not be an effective CEQA mitigation measure; nor is this mitigation measure feasible from an economic perspective within this region.
- **Relocation of Prime Farmland Topsoil.** This measure would remove the top 12 to 18 inches of topsoil from affected areas and haul this soil to a farm site or several farm sites that have lower-quality soils. The Prime Farmland soils may assist in increasing crop yield at the relocated site. This measure would have its own environmental impacts, including increased truck traffic on local roadways from both hauling soil off-site and replacement of soil on-site, increased diesel truck emissions, construction noise, and increased duration of construction. The relocation of prime farmland soils to another active farm would increase other environmental impacts and is therefore considered infeasible.

As described, these measures were considered and found to be infeasible for mitigating or avoiding the impact of the conversion of agricultural lands to other uses pursuant to the definition of CEQA in that there is no guarantee that measures would result in successfully establishing CEQA Important Farmland, if doing so could happen within a reasonable period of time, that their implementation would not potentially cause greater environmental impacts, and that acquiring additional lands to be established as CEQA Important Farmland would be economically possible.

Significance without Mitigation: Significant and unavoidable. As discussed previously, implementation of the proposed General Plan 2050 would designate CEQA Important Farmland land to non-agricultural land uses. Through the proposed General Plan 2050 goals, policies, and actions, impacts related to the conversion of qualifying agricultural lands would be reduced, but not to a less-than-significant level. The proposed General Plan 2050 contains policies and actions to reduce the conversion of qualifying agricultural lands. Specifically, proposed Policy 3-6.6 and Policy 3-6.7 to conserve and preserve agricultural land and soils, and Action 3-6.28 to prioritize conservation of agricultural properties. Proposed Action 3-6.16 discourages the conversion of agricultural land to non-agricultural use, Action 3-6.17 promotes restorative agricultural and landscaping techniques, and Action 3-6.19 requires the City to partner with the Sonoma County Agricultural Preservation and Open Space District and Sonoma Resource Conservation District to identify opportunities for

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conserving agricultural lands and preserving soil quality. These proposed General Plan 2050 policies and actions would not reduce the amount of acreage converted through implementation of the proposed project; however, they would forestall development of the best agricultural land within the EIR Study Area.

While these efforts and other mitigation measures were considered, such as preserving agricultural uses in the EIR Study Area, replacement of agricultural resources by replacing lost agricultural uses to other areas of the city, and relocation of Prime Farmland topsoil to other areas, these mitigations are not feasible. Additionally, other mitigating efforts, such as conservation easements, one-to-one preservation, and right-to-farm ordinances all work to mitigate impacts; however, the only way to fully avoid the agricultural impact from implementation of the proposed project is to not allow development on state-designated CEQA Important Farmland, thereby eliminating the agricultural impact. However, doing so is not feasible or practical as the City has a responsibility to meet other conflicting obligations, including to increase the number and types of jobs available in Santa Rosa and to reduce the need for residents to commute to high-quality jobs. These measures are critical to reducing single-occupant vehicle travel to and from Santa Rosa and meeting State targets for greenhouse gas reduction. The City needs to promote both economic development and corresponding residential development, as required by State housing law, within its adopted growth boundary. While possible forms of mitigation for, or avoidance of, conservation of agricultural lands in the EIR Study Area would be implemented by the City through its proposed General Plan 2050 policies and actions, doing so to reduce impacts to a less-than-significant level would be infeasible and inconsistent with City planning goals and objectives. Therefore, impacts would remain *significant and unavoidable*.

AG-2 Implementation of the proposed project could conflict with existing zoning for agricultural use, or a Williamson Act contract.

There are a total of 97 acres of land that are under ongoing Williamson Act contracts in the EIR Study Area. As described in impact discussion AG-1, conversion of agricultural land uses through implementation of the proposed project would affect the majority of agricultural lands within the EIR Study Area. The proposed project would potentially convert approximately 68 acres of the Williamson Act lands in the northeastern portion of the EIR Study Area to non-agricultural uses. As described under impact discussion AG-1, Chapter 3, *Circulation, Open Space Conservation, and Greenhouse Gas Reduction*, of the proposed General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider impacts to agricultural resources. While the proposed General Plan 2050 goal, policies, and actions listed in impact discussion AG-1 would reduce potential impacts related to the conversion of land under the Williamson Act, since the proposed General Plan 2050 would designate a majority of these lands to nonagricultural uses, a *significant* impact would result.

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Impact AG-2: Implementation of the proposed project could result in the loss of agricultural land under the Williamson Act.

Mitigation Measures Considered. As described in impact discussion AG-1, pursuant to CEQA, the City has considered mitigation to reduce impacts from implementation of the proposed project that could conflict with lands under a Williamson Act contract. However, as shown, no feasible mitigation measures are available that would reduce the agricultural resource impact to less-than-significant levels. Specifically, the City considered a measure that would result in the replacement of Williamson Act contract farmland that would place other farmland under Williamson Act contract. Even if feasible, the placing of alternative farmland under Williamson Act contract would establish a commitment to retain that alternative farmland for agricultural use. The length of time that the alternative land will remain in agricultural use would depend on the terms of the Williamson Act contract. However, the Williamson Act contract will only reduce the potential that the alternative land will convert to non-agricultural use. The individual and cumulative loss of agricultural land caused by the proposed project would still occur. Therefore, this mitigation measure will not reduce the proposed project's impacts on agriculture to below the level of significance. For these reasons, placing alternative privately held land under permanent restriction through Williamson Act contracts is considered infeasible.

Significance without Mitigation: Significant and unavoidable. As described in impact discussion AG-1, the proposed General Plan 2050 includes goals, policies, and actions to minimize impacts to agricultural lands. Those same proposed General Plan 2050 goals, policies, and actions would also minimize impacts from conflicts with Williamson Act lands and reduce the likelihood of premature contract cancellations by the property owners of the Williamson Act parcels in the EIR Study Area. Mitigation for this impact was considered, including the placement of other farmland under Williamson Act contract. However, the individual and cumulative loss of agricultural land under the Williamson Act caused by the proposed project would still occur. Given that CEQA does not require that the project be changed to avoid an impact, and no additional mitigation is available, this would result in a *significant and unavoidable* impact.

AG-3	Implementation of the proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.
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Implementation of the proposed project could result in potentially incompatible urban uses next to farms or ranches, creating circumstances that impair the productivity and profitability of agricultural operation, and could eventually lead farmers to take their land out of production. For example, this could manifest as complaints from new residents about noise, dust, and chemical use from agricultural operations. Concerns of farmers and ranchers about increased vandalism, traffic, access difficulties, and the introduction of domestic animals can lower productivity. Adjacent urban development may also increase land values, increasing the property tax burden for farmland not protected by Williamson Act contracts or permanent agricultural conservation easements.

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The proposed project recognizes that the agricultural history of Santa Rosa contributes to its sense of place and seeks to preserve active agricultural lands. As described under impact discussion AG-1, Chapter 3, *Circulation, Open Space Conservation, and Greenhouse Gas Reduction*, of the proposed General Plan 2050 contains a goal, policies, and actions that require local planning and development decisions to consider impacts that development could have on agricultural resources. The same proposed General Plan 2050 goal, policies, and actions listed under impact discussion AG-1 would serve to minimize potential adverse impacts of adjacent land uses on farmland. Thus, a *less-than-significant* impact would result.

Significance without Mitigation: Less than significant.

AG-4 Implementation of the proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative impacts with respect to agricultural resources.

As described in Chapter 3, *Project Description*, and throughout this Draft EIR, the proposed General Plan 2050 includes a buildout projection and population growth that would increase the urbanization of the city. To accommodate anticipated growth and achieve City goals, the proposed project plans for the conversion of agricultural land to various types of residential and job-generating development. With implementation of the proposed project in combination with agricultural impacts identified throughout Sonoma County, the proposed project would contribute to cumulative impacts to agricultural resources.

As described in impact discussions AG-1 and AG-2, implementation of the proposed project would result in significant impacts related to the conversion of farmland of concern under CEQA and of farmland under Williamson Act contracts. As such, the proposed project would contribute to the cumulative impacts of overall conversion of these lands in the region. Although the policies and actions in the proposed General Plan 2050 would reduce and partially offset regional agricultural impacts, the proposed project would contribute to cumulatively significant agricultural impacts in the region and a cumulative *significant* impact would occur.

Impact AG-4: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in a significant cumulative impact with respect to the conversion of CEQA Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) and Williamson Act properties to non-agricultural uses.

Significance without Mitigation: Significant and unavoidable. As described previously, implementation of the proposed project would result in significant and unavoidable impacts related to the conversion of CEQA Important Farmland and Williamson Act properties to non-agricultural uses. Although the proposed General Plan 2050 goals, policies, and actions would reduce and partially offset regional agricultural impacts, as well as consideration of mitigation measures to preserve agricultural lands, the only way to fully avoid the agricultural impact of the proposed project is to not allow development on state-designated CEQA Important Farmland, thereby eliminating the agricultural impact. However, this would be infeasible and inconsistent with City planning goals and objectives. Further, the amount of growth foreseen in the region and the decisions of Sonoma County and other surrounding counties

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regarding conversion of agricultural land are outside the control of the City of Santa Rosa. Therefore, this cumulative impact would be *significant and unavoidable*.