

INTRODUCTION

This section of the EIR examines the effects of the proposed project on agricultural resources and operations on the RUSP project site (project site), on areas designated for off-site infrastructure, and on adjacent lands. This section analyzes the conversion of farmland to non-agricultural uses; potential conflicts with existing zoning for agricultural uses or land under Williamson Act contract; potential conflicts with County goals, policies, and standards that may lead to substantial physical effects on the environment; and cumulative project impacts.

Comments raised in response to the Notice of Preparation (see Appendix B) included the intent of the current zoning for agriculture, the need to provide buffers to protect surrounding agriculture, conservation of agricultural land, and the potential impacts to adjacent properties that would remain in agricultural use.

ENVIRONMENTAL SETTING

RUSP Project Site

The project site encompasses approximately 1,157.5 acres consisting of predominately open agricultural land utilized for rice and dry land farming. The eastern portion (roughly two thirds) of the project site is currently in active agriculture. The western third of the project site has historically been used for cattle grazing and rice farming, but is currently fallow. This portion of the site is composed primarily of non-native annual grassland. Within the Plan Area, there are approximately 664 acres in active rice production, 297 acres in abandoned rice farming, 126 acres in dry land farming, which have been worked sporadically over the last five years, and 70 acres of wetlands, which are considered Waters of the U.S.

Current Land Use and Zoning Designations

The project site is currently zoned F-B-X (Farm - Combining 80-acre minimum parcel size) with a Placer County General Plan designation of Agriculture. The Farm (F) Zone district allows single-family residential and a variety of agricultural uses and related structures including, but not limited to, agricultural processing, animal raising and keeping, ranching, and crop production. F-B-X means farm-building site with an 80-acre minimum lot size.

California Department of Conservation Important Farmland Classifications

The California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) combines technical soil ratings and current land use information to create an inventory of Important Farmland. Information on soils is primarily taken from the U.S. Department of Agriculture soil surveys. The CDC divides Important Farmland into four categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. According to the most recent information from the FMMP, the project site contains 518 acres of Farmland of Local Importance, 564 acres of Unique Farmland, and 75 acres of Farmland of Statewide Importance. The FMMP classification is based on multiple factors, including soil type, the type of crop produced, agricultural zoning, and potential for irrigation. The area classified as Farmland of Statewide

Importance corresponds to the historical meandering creek corridors in the eastern two-thirds of the However, these corridors were straightened prior to 1993 and converted to channelized agricultural ditches. The adjacent land was graded, bermed, and converted to rice fields at the same time. All of the other rice fields on the project site are classified as either Unique Farmland or Farmland of Local Importance. There is no Prime Farmland on the project site. Important Farmland on the project site and on areas designated for off-site improvements is shown on Figure 6.2-1. Farmland category definitions are shown in Table 6.2-1.

TABLE 6.2-1

FARMLAND MAPPING AND MONITORING PROGRAM FARMLAND CLASSIFICATIONS WITHIN THE REGIONAL UNIVERSITY SPECIFIC PLAN AREA AND OFF-SITE STUDY AREAS

Land Classification	Definition	Acres within Plan Area ¹	Acres Within Off-site Study Areas ²
Prime Farmland	Prime Farmland generally consists of Class I and II soils. They have the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods.	-	-
Farmland of Statewide Importance	Similar to Prime Farmland but with some minor differences, such as greater slopes or less ability to store soil moisture. The land must have been used for irrigated agricultural production some time during the four years prior to the mapping date.	74.7	2.5
Unique Farmland	Farmland that is not classified as prime or of statewide importance, which produces one of California's 40 leading economic crops, such as grapes, artichokes, avocados, and dates. Soil characteristics and irrigation are not considered.	564.1	854.1
Farmland of Local Importance	Land other than Unique Farmland, which may be important to the local economy due to its productivity or value. Determined by each county's board of supervisors and a local advisory committee. In Placer County, Farmland of Local Importance is defined as: Farmlands not covered by the categories of Prime, Statewide, or Unique. They include lands zoned for agriculture by County Ordinance and the California Land Conservation Act as well as dry farmed lands, irrigated pasture lands, and other agricultural lands of significant economic importance to the County and include lands that have a potential for irrigation from Placer County water supplies.	518.5	480.2
Grazing Land	Land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for Grazing Land is 40 acres.	-	-
Urban and Built-up Land	Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.	-	-
Other Land	Land not included in any other mapping category. Examples of land classified as Other Land include low density rural developments; timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is also mapped as Other Land.	-	-
	Total	1,157.3	1,336.8

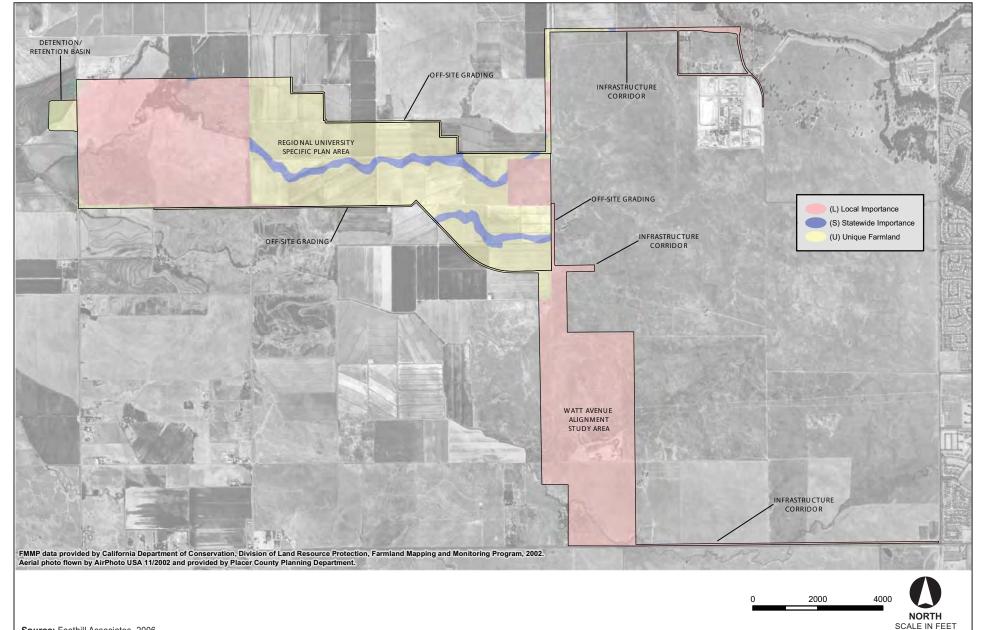
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Acreages from Foothill Associates, 2006.

Acreages may not exactly match numbers in text due to rounding.

Acreages represent study area acreage, not the area of impact.

Source: California Department of Conservation, California Farmland Conversion Report 1998-2000, page 5.



Source: Foothill Associates, 2006.



FIGURE **6.2-1**

Farmland Mapping and Monitoring Program

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Regional University Specific Plan EIR

Soils

There are several methods for classifying soil quality for agricultural uses. One method involves a soil capability rating provided by the Natural Resources Conservation Service (NRCS). Capability ratings indicate, in a general way, the suitability of soils for most kinds of field crops. The classes are developed according to the limitation of the soils when used for field crops, the risk of damage when they are used, and the way they respond to treatment. The broadest capability groups are designated by Roman numerals I through VIII. Prime Farmland usually consists of Class I and Class II soils. Soils on the project site are primarily Class III and IV soils (approximately 1,007 acres), which have severe limitations for agricultural production. The remaining soils on the project site are Class VIII soils (approximately 150 acres), which have limitations that preclude their use for commercial crop production. Soils on the project site and on areas designated for off-site improvements are shown on Figure 6.2-2. NRCS Soil Classification Ratings are shown in Table 6.2-2.

TABLE 6.2-2

SOIL CLASSIFICATION RATINGS WITHIN THE REGIONAL UNIVERSITY SPECIFIC PLAN AREA AND OFF-SITE STUDY AREAS

Class	Description	Acres within Plan Area ¹	Acres Within Off-site Study Areas ²
Class I	soils have few limitations that restrict their use.	-	-
Class II	soils have moderate limitation that reduce the choice of plants or that require moderate conservation practices.	-	-
Class III	soils have severe limitation that reduce the choice of plants, require special conservation practices or both.	154.7	66.3
Class IV	soils have very severe limitations that reduce the choice of plants, require very careful management, or both.	852.2	1162.2
Class V	soils are not likely to erode but have other limitations, impractical to remove, that limit their use largely to pasture, range, woodland, or wildlife.	-	-
Class VI	soils have severe limitations that make them generally unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife.	-	-
Class VII	soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife.	-	-
Class VIII	soils and landforms have limitations that preclude their use for commercial plants and restrict their use to recreation, wildlife, or water supply, or to aesthetic purposes.	150.2	107.7
	Total	1,157.1	1,336.2

Notes:

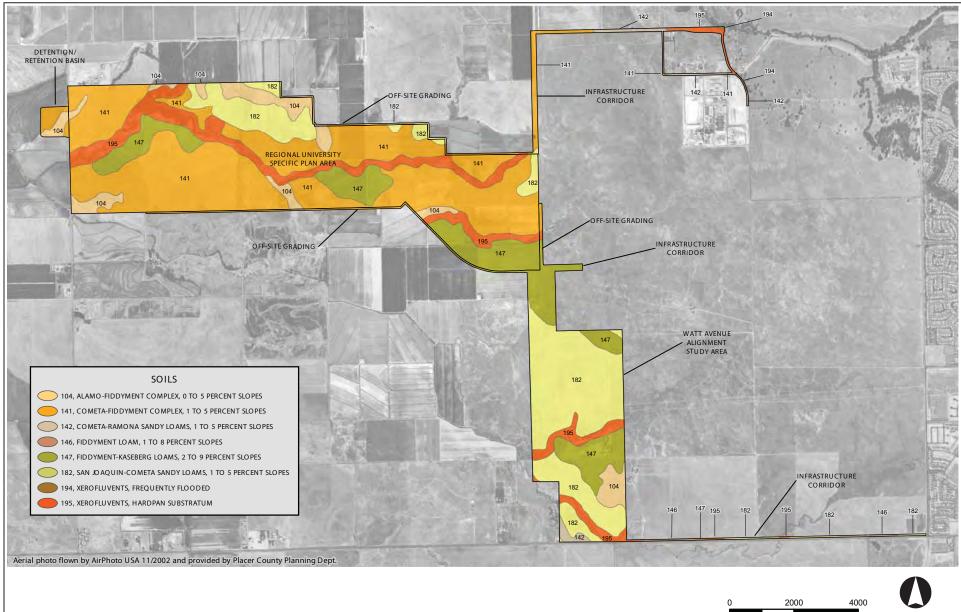
Source: United States Department of Agriculture Soil Conservation Service, Soil Survey of Merced County, California, Issued June 1972. Acreages from Foothill Associates, 2006.

Off-Site Infrastructure

Proposed off-site infrastructure would include a 20-acre detention/retention basin, a proposed extension of Watt Avenue, pipeline and infrastructure corridors, and areas for off-site grading.

^{1.} Acreages may not exactly match numbers in text due to rounding.

^{2.} Acreages represent study area acreage, not the area of impact.



Source: Foothill Associates, 2006.





FIGURE **6.2-2**

Soil Classifications

D50840.02

Regional University Specific Plan EIR

A 20-acre dual detention/retention basin that would receive flows directly from a storage area within the project area would be constructed immediately west of Brewer Road.

Within the 473-acre study area for the Watt Avenue extension, construction would disturb approximately 42.5 acres of land classified predominately as Farmland of Local Importance under the FMMP.

The areas proposed for pipeline and infrastructure corridors are not in agricultural use. The northsouth-trending portion of the corridor to the north of the project site would be located on what is currently a farm road. The east-west-trending portion of the corridor to the north of the project site would be located along Phillip Road. The east-west-trending corridor to the south of the project site would be located along Base Line Road.

The areas proposed for off-site grading to separate the developed areas within the project site from off-site agricultural uses comprise approximately 16.5 acres of land classified predominately as Unique Farmland under the FMMP.

In total, approximately 118.5 acres of agricultural land would be converted for off-site infrastructure (49.5 acres for the Watt Avenue extension, 20 acres for the detention/retention basin, and 49 acres for infrastructure alignments and off-site grading). Soils in the areas proposed for off-site infrastructure are Class III, IV and VIII, which have severe limitations for agricultural production.

Adjacent Lands

Lands to the south, west, and north of the project site and off-site improvement areas are used primarily for rice farming, grazing, or are fallow. Lands to the east are included in the West Roseville Specific Plan (WRSP), within the City of Roseville, have been approved for non-agricultural uses. and are currently under development. Soils on lands adjacent to the project site and off-site improvement areas are Class III and IV, which have severe limitations for agricultural production.

REGULATORY SETTING

Federal Regulations

There are no federal regulations applicable to agricultural resources.

State Regulations

Williamson Act

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

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

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

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

No parcels within the project site or off-site improvement areas are currently enrolled under a Williamson Act contract. However, one parcel north of and adjacent to the University portion of the project site is enrolled under a Williamson Act contract and parcels south of and adjacent to the University portion of the project site have been enrolled under a Williamson Act contract, but are currently in non-renewal. Potential project conflicts with parcels under Williamson Act contract are addressed in the impact analysis below.

Local Regulations

Placer County General Plan

The Placer County General Plan was adopted in August 1994. Relevant goals and policies related to agricultural resources are listed below:

Goal 1.H To designate adequate agricultural land and promote development of agricultural uses to support the continued viability of Placer County's agricultural economy.

Policies

- 1.H.1. The County shall maintain agriculturally-designated areas for agricultural uses and direct urban uses to designated urban growth areas and/or cities.
- 1.H.2. The County shall seek to ensure that new development and public works projects do not encourage expansion of urban uses into designated agricultural areas.

- 1.H.4. The County shall allow the conversion of existing agricultural land to urban uses only within community plan areas and within city spheres of influence where designated for urban development on the General Plan Land Use Diagram.
- 1.H.5. The County shall require development within or adjacent to designated agricultural areas to incorporate design, construction, and maintenance techniques that protect agriculture and minimize conflicts with adjacent agricultural uses.
- 1.H.6. The County shall require new non-agricultural development immediately adjacent to agricultural lands to be designed to provide a buffer in the form of a setback of sufficient distance to avoid land use conflicts between the agricultural uses and the non-agricultural uses. Such setback or buffer areas shall be established by recorded easement or other instrument, subject to the approval of County Counsel. A method and mechanism (e.g., a homeowners association or easement dedication to a non-profit organization or public entity) for guaranteeing the maintenance of this land in a safe and orderly manner shall be also established at the time of development approval.

Goal 7.A To provide for the long-term conservation and use of agriculturally-designated lands.

Policies

- 7.A.1. The County shall protect agriculturally-designated areas from conversion to non-agricultural uses.
- 7.A.3. The County shall encourage continued and, where possible, increased agricultural activities on lands suited to agricultural uses.
- 7.A.7. The County shall maintain agricultural lands in large parcel sizes to retain viable farming units.
- 7.A.8. The County shall encourage infill development in urban areas as an alternative to expanding urban boundaries into agricultural areas.

Goal 7.B To minimize existing and future conflicts between agricultural and non-agricultural uses in agriculturally-designated areas.

Policies

- 7.B.1. The County shall identify and maintain clear boundaries between urban/suburban and agricultural areas and require land use buffers between such uses where feasible. These buffers shall occur on the parcel for which the development permit is sought and shall favor protection of the maximum amount of farmland.
- 7.B.3. The County shall consider fencing subdivided lands adjoining agricultural uses as a potential mitigation measure to reduce conflicts between residential and agricultural uses. Factors to be considered in implementing such a measure include:
 - a. The type of agricultural operation (i.e., livestock, orchard, timber, row crops);
 - b. The size of the lots to be created;
 - c. The presence or lack of fences in the area;
 - d. Existing natural barriers that prevent trespass; and
 - e. Passage of wildlife.

7.B.4. The County shall continue to enforce the provisions of its Right-to-Farm Ordinance and of the existing state nuisance law.

Buffer Zones

In addition to the goals and policies identified above, the General Plan requires the use of buffer zones in several types of development. While the exact dimensions of the buffer zones and specific uses allowed in buffer zones are to be determined through a specific plan, land use permit, and/or subdivision review process, buffer zones must conform to the following standards:

- 1. Agriculture/Timberland Buffers. These buffer zones are required to separate urban uses (particularly residential) from lands designated Agriculture or Timberland on the Land Use Diagram, where noise from machinery, dust, the use of fertilizers and chemical sprays, and other related agricultural/timber harvesting activities would create problems for nearby residential and other sensitive land uses. These buffers also serve to minimize disturbance of agricultural operations from nearby urban or suburban uses, including trespassing by nearby residents and domestic animals.
 - **a. Buffer Dimensions:** Timber harvesting and agricultural practices associated with crop production can contribute to land use conflicts when development occurs adjacent to agricultural and timberland areas. Since production practices vary considerably by crop type, buffer distances may vary accordingly. The separations shown in the table below are required between areas designated Agriculture or Timberland and residential uses, commercial/office uses, business park uses, and some types of recreational uses; no buffers are required for other uses. The buffer widths are expressed as ranges because of the possible influences of site or project-specific characteristics.

MINIMUM AGRICULTURE/TIMBERLAND BUFFER ZONE WIDTH						
Agricultural / Timberland Hee	Buffer Zone Width					
Agricultural / Timberland Use	Residential Exclusion Area ¹	Buffer Width Range ²				
Field crops	100 feet	100 to 400 feet				
Irrigated orchards	300 feet	300 to 800 feet				
Irrigated vegetables, rice	400 feet	200 to 800 feet				
Rangeland/pasture	50 feet	50 to 200 feet				
Timberland	100 feet	100 to 400 feet				
Vineyard	400 feet	400 to 800 feet				
Notes:						

- Residential structures prohibited; non-habitable accessory structures permitted.
- Required buffer dependent on site or project-specific characteristics as determined through County's specific plan, land use permit, and/or subdivision review process.
- **b. Uses Allowed in Buffer:** Low-density residential uses on parcels of one to 20 acres or open space uses are permitted within the buffer, although the placement of residential structures is subject to the minimum "residential exclusion areas" shown in the table above. Non-habitable accessory structures and uses may be located in the exclusion area, and may include barns, stables, garages, and corrals.

Placer Legacy Open Space and Agricultural Conservation Program

The Placer Legacy Open Space and Agricultural Conservation Program (Placer Legacy Program) was adopted in 1998 to "protect and conserve open space and agricultural lands in Placer County." The Placer Legacy Program implements the goals, policies, and programs of the 1994 Placer

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Placer County Planning Department, *Placer Legacy Open Space and Agricultural Conservation Program Summary*, June 20, 2000, page 1.

County General Plan and supplements existing open space and conservation programs. The Placer Legacy Program also "provides important resource information to guide and direct decisions on the preparation of environmental documents for compliance with the California Environmental Quality Act and for discretionary land use entitlements being examined by County staff." The objectives of the Placer Legacy Program are to:

- Maintain a viable agricultural segment of the economy;
- Conserve natural features necessary for access to a variety of outdoor recreation opportunities;
- Retain important scenic and historic areas:
- Preserve the diversity of plant and animal communities:
- Protect endangered and other special status plant and animal species;
- Separate urban areas into distinct communities; and
- Ensure public safety.

Implementation measures for the Placer Legacy Program are contained in the *Placer Legacy Summary Report* (June 2000) and the *Placer Legacy Program Implementation Report* (June 2000). For implementation purposes, the County was divided into ten Study Areas based on "common geographic and political boundaries." The development of the implementation measures was based on "an assessment of each area's existing open space resources, development trends, stressors and conflicts, and opportunities for Placer Legacy Program involvement." The project site is located within the Agricultural Valley Study Area. Placer Legacy Program implementation measures for the Agricultural Valley Study Area that are pertinent to agricultural resources on and in the vicinity of the project site are listed below:

- AV-1. Maintain commercially viable agriculture over a large area by promoting the Williamson Act and encouraging the donation of conservation easements, where appropriate.
- AV-2. Work with local farm organizations to identify districts or regions where agricultural conservation opportunities can be identified and coordinated.
- AV-3. Convene a water forum with PCWA, NID and South Sutter Irrigation District to determine how water can be made reliably available for agriculture, as well as habitat conservation and restoration.
- AV-5. Support the County's Right-To-Farm Ordinance provisions.
- AV-6. Prioritize the acquisition, through purchase of fee title and/or conservation easements, of agricultural property that contains multiple open space resource values.

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² Placer County Planning Department, *Placer Legacy Open Space and Agricultural Conservation Program Summary*, June 20, 2000, page 2.

³ Placer County Planning Department, *Placer Legacy Open Space and Agricultural Conservation Program Summary*, June 20, 2000, page 23.

Placer County Planning Department, *Placer Legacy Open Space and Agricultural Conservation Program Summary*, June 20, 2000, page 23.

- AV-21. Provide certainty to farmers and ranchers concerning the future extent of urban encroachment by coordinating with cities to create permanent greenbelts around urban areas.
- AV-22. Establish permanent transition areas and buffers between urban/suburban areas and agricultural areas through conservation easements and/or fee title acquisition of lands containing multiple resource values.⁵

Placer County Right-to-Farm Ordinance

Placer County adopted a Right-to-Farm Ordinance to reduce the loss the County's commercial agricultural resources by limiting the circumstances under which agricultural operations may be deemed to constitute a nuisance.

5.24.040 Right-to-farm.

- A. It is the declared policy of the county of Placer to preserve, protect and encourage the development and improvement of its agricultural land for the production of food and other agricultural products. When nonagricultural land uses extend into the agricultural areas, agricultural operations often become the subject of nuisance suits. As a result, agricultural operations are sometimes forced to cease or are substantially curtailed. Others may be discourages from making investments in agricultural improvements. It is the purpose of this section to reduce the loss to the county of its commercial agricultural resources by limiting the circumstances under which agricultural operations may be deemed to constitute a nuisance.
- B. No agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than one year if it was not a nuisance at the time it began.
- C. For purpose of this section, the term "agricultural activity, operation, or facility, or appurtenances thereof" shall include, but not be limited to, the cultivation and tillage of soil, dairying, the production, cultivation, growing, and harvesting of any agricultural commodity including timber, Christmas trees, viticulture, apiculture, nursery stock, or horticulture, the raising of livestock, fur bearing animals, fish, or poultry, and game birds, and any practices performed by a farmer or on a farm as incident to or in conjunction with such farming operations, including preparation for market, delivery to storage, or to market, or to carriers for transportation to market.
- D. For the purpose of this section, commercial "agriculture" means those agricultural lands in designated areas, or those lands that are within the California Land Conservation Act, or within a timber preserve zone or those lands that produce a gross annual income of four thousand five hundred dollars (\$4,500.00) from the sale of agricultural products.
- E. Each prospective buyer of property in unincorporated Placer County shall be informed by the seller or his/her authorized agent of the right-to-farm ordinance. The seller or his/her authorized agent will keep on file a disclosure statement signed by the buyer with the escrow process.
- F. Whenever a building designated for residential occupancy is to be located on property in the unincorporated area of Placer County, the owners of the property, or their authorized agent, shall acknowledge receipt of the right-to-farm ordinance. (Ord. 4983-B, 1999: prior code § 5.715)

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⁵ Placer County Planning Department, *Placer Legacy Open Space and Agricultural Conservation Program Summary*, June 20, 2000, page 24.

IMPACTS AND MITIGATION MEASURES

Methods

Potential impacts were assessed based upon information contained in a variety of sources, including the *Placer County General Plan;* the *Placer Legacy Open Space and Agricultural Conservation Program Summary;* the *Regional University Specific Plan;* the United States Department of Agriculture *Soil Survey of Placer County, Western Part;* the California Department of Conservation Farmland Mapping and Monitoring Program; and Geographic Information Systems (GIS) data for the project area. Additional information on existing agricultural uses on the project site, offsite improvement areas, and adjacent lands was gathered on a site visit conducted by PBS&J staff on August 18, 2005.

Standards of Significance

Under criteria based on the State CEQA Guidelines, for the purposes of this EIR, an impact would be considered significant if the proposed project would:

- Convert Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance) as defined in the California Department of Conservation Farmland Mapping and Monitoring Program to non-agricultural use;
- Create potential conflicts with County goals, policies, and standards that may lead to physical impacts on the environment;
- Conflict with existing zoning for agricultural use or with a Williamson Act contract; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland to non-agricultural use.

Project-Specific Impacts and Mitigation Measures

6.2-1 The proposed project could convert Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance) as defined in the California Department of Conservation Farmland Mapping and Monitoring Program to non-agricultural use.

The California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) combines technical soil ratings and current land use information to create an inventory of Important Farmland. The CDC divides Important Farmland into four categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. In addition, the Placer County Agriculture Department recognizes all farmland that would be converted to non-agricultural use for the RUSP project as farmland that is critical to the shrinking agricultural land base in Placer County, and recommends that conversion of all farmland to non-agricultural uses be mitigated on a 1:1 basis.⁶

According to the most recent information from the FMMP, the approximately 1,157.5-acre RUSP project site contains 518.5 acres of Farmland of Local Importance, 564.1 acres of Unique Farmland,

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⁶ Christine Turner, Placer County, Agricultural Commissioner/Sealer of Weights, Email communication to Paul Thompson, Placer County Planning Department, September 15, 2005.

and 74.7 acres of Farmland of Statewide Importance. Agricultural lands that would be disturbed due to the construction of off-site infrastructure include 49.5 acres of land classified predominately as Farmland of Local Importance for an extension of Watt Avenue; 26 acres of land classified predominately as Unique Farmland for off-site grading; and 20 acres of Unique Farmland for a detention/retention basin. Because the ultimate footprint of the Watt Avenue extension and off-site grading areas would not occupy the entire disturbed area, the impacted area would be approximately 35 acres and 16.5 acres, respectively. The project proposes that the detention/retention basin would be used for agricultural purposes, such as grazing, so this area would not be converted. Table 6.2-3 shows the total acres of agricultural land that would be affected by the proposed project.

TABLE 6.2-3 RUSP AGRICULTURAL IMPACT ACREAGE ANALYSIS ¹							
	Total Acres	Project Summary Acres	Ag Impact Acres				
University	600						
University Development		416.5	416.5				
University Open Space		183.5	0				
Community	557.5						
Community Development		454.1	454.1				
Community Open Space		63.8	62.65 ²				
Community Parks		39.6	39.6				
Offsite Infrastructure Areas	124.36						
Watt Avenue		49.5	35.03 ²				
Off-site Grading		26	16.5 ²				
Utility Corridors		28.86	0 ²				
Offsite Detention/Retention Basin		20	0 ²				
Total	1,281.86	1,281.86	1,024.38				

Source: Footbill Associates 2006

Development of the RUSP project site plus areas proposed for off-site infrastructure would result in the conversion of approximately 1,024 acres of Important Farmland, as defined by the CDC and farmland recognized by the Placer County Agriculture Department as critical to the shrinking agricultural land base in Placer County, to non-agricultural uses. In addition to the 1,024 acres of Important Farmland proposed for conversion with this project, the project site includes approximately 183.5 acres of land that currently supports no agricultural uses because of the dense matrix of naturally occurring and created wetlands that predominate the acreage. Although this land is identified as Important Farmland, the acreage has not been used for farming, and the land is important to maintain the existing biological resources and the natural drainage needed to support the wetlands. This acreage would be preserved in Open Space under the proposed project to provide multiple benefits, including passive recreation, habitat, and stormwater detention/retention, and the land will continue to function in a similar manner to its current use/function. As a result, these 183.5 acres are not included in the acreage of land identified for conversion of Important Farmland, and the proposed project would convert 1,024 acres of Important Farmland that is currently used for agricultural purposes to developed urban uses. This is considered a significant impact.

A 1.15-acre portion of the Community open space is a perennial drainage and is not counted as agricultural land.

Portions of these off-site infrastructure areas would be temporarily affected during construction and would not result in a long-term loss of

Mitigation Measure

Although implementation of Mitigation Measure 6.2-1 would permanently protect an amount of farmland equal to that converted to non-agricultural uses for the proposed project, it would not prevent the direct loss of farmland on the project site and on areas designated for off-site infrastructure. Purchase of conservation easements would preserve existing farmland, but would not create new farmland to replace that lost to project development. Because the proposed project would convert Important Farmland to non-agricultural uses, this impact would remain **significant** and **unavoidable**.

6.2-1 In order to mitigate for the loss of farmland resources converted to non-agricultural uses on the project site and on areas designated for off-site improvements, one acre of agricultural land within Placer County shall be preserved for each acre of agricultural land impacted by the Community and University development within the project area. A total of 1,024 acres has been identified to be compensated at this one-to-one ratio. That portion of the University site consisting of 183.5 acres proposed as open space and not currently in agricultural production and 53 acres of land temporarily impacted do not require mitigation. If the 20-acre offsite detention/retention basin can used for agricultural purposes while maintaining its functional use as a detention/retention basin as determined by the County, no mitigation shall be required for this area. Mitigation lands shall be protected by agricultural conservation easements containing restrictive encumbrances in a form deemed acceptable to and approved by the County.

Lands proposed for mitigation shall satisfy at least one of the following criteria, as determined by the Planning Director in consultation with the County Agricultural Commissioner: (1) be in agricultural production, or have the potential to support agriculture, (2) be undeveloped and have a Natural Resources Conservation Service soils classification of the same or greater value than lands being affected within the Regional University Specific Plan property at issue, or (3) be undeveloped and have the same or higher value California Department of Conservation Important Farmland Mapping categorization than lands being affected with the Specific Plan property. "In-kind" mitigation (i.e., rice land for rice land) is not required for the agricultural land impacted by the development within the Project Area when so approved by County.

Mitigation land shall be acquired in increments of no less than 80 total contiguous acres in size. This 80-acre minimum size standard can be met by the acquisition of one or more parcels that cumulatively add up to 80 acres or more. The mitigation land shall be within or adjacent to lands designated as Agriculture or Open Space within the Placer County General Plan, unless the Planning Director, in consultation with the County Agricultural Commissioner, determines the proposed land meets the purpose and intent of this mitigation measure.

Mitigation lands shall be acquired in the appropriate minimum size prior to approval by the County of any permit or entitlement that could result in ground disturbance (e.g., prior to issuance of grading permit or improvement plans), including the construction of off-site or on-site project infrastructure.

6.2-2 The proposed project could create potential conflicts with County goals, policies, and standards that may lead to physical impacts on the environment.

Goals and policies from the Placer County General Plan and the Placer Legacy Program that are relevant to the proposed project are listed above in the Regulatory Setting. The goals and policies focus on the preservation of agricultural uses and the protection of existing agricultural operations in Placer County from land use conflicts.

As discussed in Impact 6.2-1, the proposed project would convert farmland to non-agricultural uses. Of the land that would be disturbed for construction of the proposed project, approximately 1,024 acres are used for agriculture. General Plan policy 1.H.4 allows the conversion of existing agricultural land to urban uses only within community plan areas and within city spheres of influence where the subject land is designated for urban development on the General Plan Land Use Diagram. Although the project site is not within an approved community plan area, it is within an area defined in the General Plan as a "Future Study Area." As stated in Part III of the Placer County General Plan, the County "recognizes that as the county continues to grow, additional areas may be identified as being suitable for development at urban or suburban densities and intensities. The most appropriate location for such additional growth, and the area that will be considered first by the County, is the 'Future Study Area,'". The County is considering a portion of the Future Study Area, including the RUSP site and much of the land bordering the RUSP site, for development as the Curry Creek Community Plan, though the County has not yet initiated the formal planning process. So, although the project site is currently designated for agriculture, its possible conversion to other uses was anticipated in the General Plan as a Future Study Area.

The proposed project includes an amendment to the Placer County General Plan policy 1.H.4 that would allow the conversion of existing agricultural land to urban uses within specific plan areas, as well as for community plan areas. The process for approval of a community plan would be similar to that required for a specific plan: both would require environmental documentation (such as an EIR) that would be circulated for public review and comment and would ultimately have to be approved by the Placer County Board of Supervisors. Therefore, the project would be consistent with the overall intent of General Plan policy 1.H.4. If approved, this amendment would apply to other specific plans in the County as well as the proposed project. However, this amendment would broaden the policy to allow conversion of agricultural land in specific plans, which, as noted above, would undergo a similar process to that required for community plans, including preparation of an environmental document that would be circulated for public review and comment. Therefore, this amendment would not result in an additional physical change in the environment that would not otherwise be subject to environmental review. However, such an amendment could be seen by some person as setting a political precedent for other projects, not already identified in the General Plan for development, to convert agricultural land to non-agricultural uses.

The Placer County General Plan requires the use of buffer zones in several types of development. These buffer zones are required to separate urban uses (particularly residential) from lands designated Agriculture or Timberland on the Land Use Diagram. The County requires the buffer zones because external effects of agricultural operations, such as noise from machinery, dust, the use of fertilizers and chemical sprays, and other related agricultural/timber harvesting activities, could create problems for nearby residential and other sensitive land uses. A conflict may be created when development intrudes into areas of existing agriculture, which, when located in rural areas, can generally carry on activities burdening adjacent properties without having to mitigate for such effects. The County's minimum buffers, included on the development side, are intended to allow agriculture, with its external effects, to continue adjacent to development. In addition, Measure AV-22 of the

Placer Legacy Program recommends, but does not require, the establishment by the County of "permanent transition areas and buffers between urban/suburban areas and agricultural areas through conservation easements and/or fee title acquisition of lands containing multiple resource values." These buffers also serve to minimize disturbance of agricultural operations from nearby urban or suburban uses, including trespassing by nearby residents and domestic animals. Since production operations vary by crop or agricultural type, the effect of those operations can vary; thus the General Plan includes different buffer distances for various crops or agricultural types. For instance, rice production requires the aerial application of seed and fertilizers, so the buffer for rice production is a minimum of 400 feet. Practices associated with grazing, on the other hand, are less intense, so the General Plan requires a 100-foot buffer.

The proposed project does not include buffers, but the RUSP includes proposed amendments to the Placer County General Plan (see "Required Permits and Approvals" in Chapter 2, Project Description), including amendments that would allow the County to establish different buffer zone standards, or remove buffer zone standards, within a specific plan as part of the specific plan approval. Therefore, with approval of the proposed amendments, the project would be consistent with the General Plan. However, the change or removal of buffer zone standards that would be permitted by the revised General Plan policies could result in a loss of agricultural productivity on lands adjacent to the proposed project and on lands adjacent to future specific plans in Placer County. These lands would not be converted to non-agricultural use as a result of development of the RUSP, but since one of the purposes of the buffers is to minimize disturbance of agricultural operations from nearby urban or suburban uses, the policy assumes that the absence of buffers would result in a disturbance of agricultural operations and a resultant loss of productivity on lands where buffers would be required absent the proposed policy revisions.

A number of factors prevent a quantified determination of loss of agricultural productivity that could result from the revised General Plan policies on lands adjacent to the proposed project and on lands adjacent to future specific plan areas in Placer County. These factors include the types of agricultural uses affected by the policy revisions, the types of land uses proposed within a specific plan, and the selection of alternate agricultural uses within the affected areas. For example, the General Plan requires a buffer width range of 200 to 800 feet and a residential exclusion area of 400 feet between urban development and irrigated rice and vegetables. For field crops, the required buffer width range is 100 to 400 feet, with a residential exclusion area of 100 feet. The proposed project site is on land used predominately for irrigated rice farming. Using the standards of the General Plan, the development of the proposed project would result in a loss of rice-farming potential within 400 feet of all residential uses. However, lands adjacent to the developed project could be suitable for other forms of agricultural production. New development adjacent to existing agricultural operations generating substantial external effects (e.g., odors or pesticide drift) could effectively require an adjacent farmer or rancher to modify their agricultural operation to accommodate the development by reducing the extent of external effects. For instance, according to the General Plan, field crops could be operated within 100 feet of residential uses. Therefore, in the case of the proposed project, the loss of agricultural productivity on lands adjacent to residential uses that would result from the proposed General Plan amendments is unknown because the number of productive acres lost is dependent on the selection of alternate crops on land currently used for irrigated rice. At the County level, the loss of agricultural productivity that would result from the proposed General Plan amendments would depend upon the number and location of specific plans to which the revised policies would apply, the land uses within the proposed specific plan, and the selection of alternate agricultural uses within the affected areas. In the case of land uses within a specific plan, the General Plan does not require buffers for all land uses; they are required only for commercial/office uses, business park uses, and some types of recreational uses. Therefore, it is

reasonable to assume that agricultural operations and land uses proposed within a specific plan that do not require buffers are fully compatible. In any event, all future specific plans in Placer County will require public disclosure of environmental impacts in an environmental document, which will be subject to approval by the Board of Supervisors. Nonetheless, because the proposed project includes General Plan amendments that could result in a loss of productivity on an undetermined number of acres of agricultural land, and no mitigation is available to prevent or reduce this loss, this impact is considered *significant and unavoidable*.

Mitigation Measure

None available.

6.2-3 The proposed project could conflict with existing zoning for agricultural use or with a Williamson Act contract.

The project site is currently zoned F-B-X (80-acre minimum) with a General Plan designation of Agriculture. This designation allows a variety of agricultural uses and related structures including, but not limited to, agricultural processing, animal raising and keeping, ranching, and crop production. F-B-X means farm-building site with an 80-acre minimum lot size. The proposed project would convert farmland to develop a university campus and mixed use community and associated off-site infrastructure on land currently designated for agricultural uses in the County General Plan and zoning ordinance. However, the proposed project is within the "Future Study Area," indicating that the County has determined that the subject land is appropriate to consider for suburban or urban growth. Therefore, although the project site is currently designated for agriculture, its ultimate conversion to other uses was anticipated in the General Plan. In addition, much of the land bordering the RUSP project site is planned, or being considered, for future urban development. In addition, the proposed project includes an amendment to the General Plan to designate the project site for development. Therefore, the project as proposed would not conflict with the Agriculture designation in the General Plan.

No parcels within the RUSP project site or off-site improvement areas are currently enrolled under a Williamson Act contract. However, a 159.38-acre parcel (APN 017-090-021-510) north of and adjacent to the University portion of the project site is enrolled under a Williamson Act contract, and parcels south of and adjacent to the University portion of the project site (APNs 017-130-007-000 [52.26 acres], 017-130-009-000 [118.6 acres], 017-130-034-000 [20.17 acres], and 017-130-033-000 [19.74 acres]) are enrolled under a Williamson Act contract, but are currently in non-renewal and will expire in 2014. The parcels under Williamson Act contract identified above and adjacent Williamson Act parcels in the project vicinity that would not be affected by the proposed project are shown on Figure 6.2-3. As discussed above in Impact 6.2-1, because the proposed project does not include buffers within the site, there would be the potential for incompatibilities between future users of the RUSP site and adjacent agricultural operations. Because the proposed project would include residential uses adjacent to agricultural uses, certain agricultural practices, such as aerial spraying of pesticides, could be limited or eliminated, which could result in a potential loss of productivity on adjacent lands. However, lands to the south have filed for non-renewal of the Williamson Act contracts and there is an existing residence on the parcel to the north that is currently under contract, so intense farming in this area would already be limited. Nonetheless, because there would be no buffers included on the project site, there could be a loss of agricultural productivity on the land enrolled under a Williamson Act contract. Therefore, this would be considered a significant impact. No mitigation is available to prevent or reduce this loss; therefore, this impact is considered significant and unavoidable.

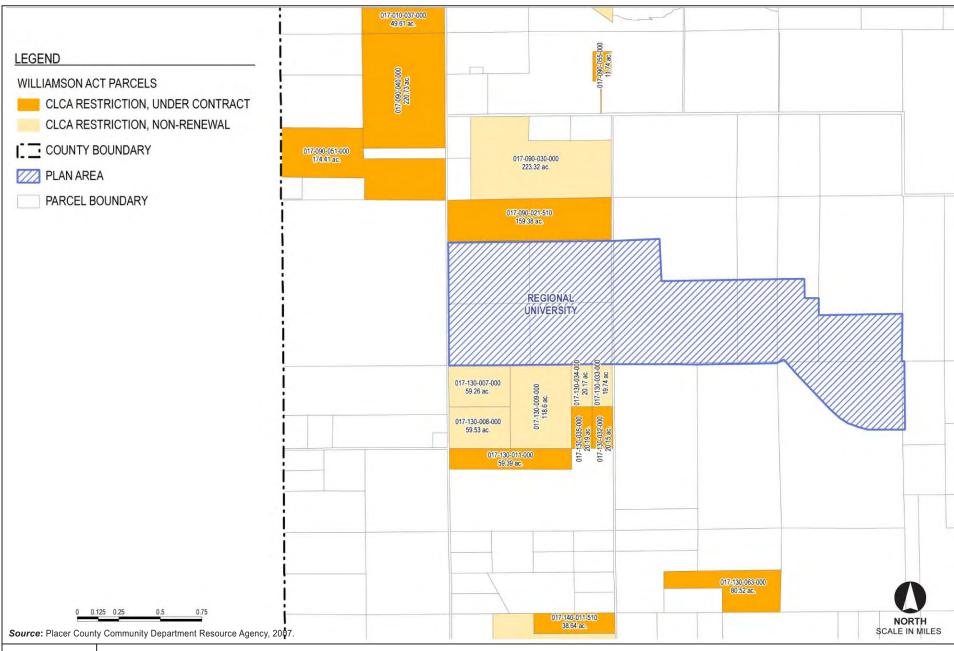




FIGURE **6.2-3**

Williamson Act Parcels in the Project Vicinity

D50840.02

Regional University Specific Plan EIR

Mitigation Measure

None available.

Cumulative Impacts and Mitigation Measures

6.2-4 The proposed project, in conjunction with other development in Placer County, could convert Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance) as defined in the California Department of Conservation Farmland Mapping and Monitoring Program, to non-agricultural uses.

The cumulative context for the loss of farmland would be development in west Placer County, including development in the cities of Lincoln and Rocklin; the West Roseville Specific Plan and Sierra Vista Specific Plan in the City of Roseville; and the Curry Creek Community Plan, the Placer Ranch Specific Plan, and the Placer Vineyards Specific Plan in unincorporated Placer County.

Development of the RUSP project site plus areas proposed for off-site infrastructure would result in the conversion of approximately 1,207.5 acres of Important Farmlands, as defined by the CDC to non-agricultural uses. Although approximately 1,024 acres of that total is currently used for agricultural purposes, farmland within the County is recognized by the Placer County Agriculture Department as critical to the shrinking agricultural land base in Placer County. Future development in Placer County would convert Important Farmland to non-agricultural uses. Specifically, development in the vicinity of the project site, including the West Roseville Specific Plan and Sierra Vista Specific Plan in the City of Roseville, the Curry Creek Community Plan, Placer Ranch Specific Plan, Placer Vineyards Specific Plan, and RUSP, is projected to convert more than 18,000 acres of land classified predominantly as Farmland of Local Importance and Unique Farmland by the CDC. Additional farmland is being converted in the cities of Lincoln and Rocklin. The cumulative loss of agricultural land would result in a *significant impact*. The RUSP project's contribution would represent approximately 9 percent of the converted Important Farmland in the immediate vicinity of the project site. The incremental impact of the proposed project on the cumulative loss of agricultural land in Placer County is *cumulatively considerable*.

Although implementation of Mitigation Measure 6.2-1 would set aside farmland to compensate for some of the farmland converted to non-agricultural uses for the proposed project, it would not prevent the direct loss of farmland in Placer County contributed by the proposed project. Purchase of conservation easements would preserve existing farmland elsewhere in the County, but would not create new farmland to replace that lost to project development. Therefore, on a cumulative level, the impact is considered *significant and unavoidable*.

Mitigation Measure

- 6.2-4 Implement Mitigation Measure 6.2-1.
- 6.2-5 The proposed project, in conjunction with other development in Placer County, could create potential conflicts with County goals, policies, and standards that may lead to physical impacts on the environment.

As discussed in Impact 6.2-2, there are goals and policies contained in the Placer County General Plan and the Placer Legacy Program that focus on the preservation of agriculture uses in Placer

County and the protection of existing agricultural operations from land use conflicts. These goals and policies would apply to future development and serve to reduce impacts on agricultural land. However, the RUSP includes proposed amendments to the Placer County General Plan that would allow the County to establish different buffer zone standards, or remove buffer zone standards. within a specific plan as part of the specific plan approval. If the proposed amendments are approved, future development in the County could be developed without buffers for agricultural land, thus affecting agricultural production within the County. This would be considered a significant cumulative impact. The proposed project would contribute to this impact by developing the project site without including buffers for the adjacent agricultural land. The proposed project's contribution to the cumulative reduction in agricultural production due to the potential elimination of buffers is, therefore, cumulatively considerable. Because no mitigation is available to reduce this impact, the cumulative impact remains significant and unavoidable.

Mitigation Measure

None available.

The proposed project, in conjunction with other development in west Placer County, could conflict with existing zoning for agricultural use or with a Williamson Act contract.

The majority of development in western Placer County will occur on agricultural land, some of which could be under Williamson Act contract. However, the extent to which future development would conflict with agricultural zoning or Williamson Act contracts is not known. Nonetheless, the conversion of agriculturally zoned land would be cumulatively significant. Although the proposed project would not result in the development of land under a Williamson Act contract, as discussed in Impact 6.2-3, the project could indirectly affect production on land under a Williamson Act contract. Therefore, the project's incremental contribution to this impact is *cumulatively considerable* and this would be a significant cumulative impact. Because no mitigation is available to prevent or reduce this loss, this is considered a significant and unavoidable cumulative impact.

6.2 - 20

Mitigation Measure

None available.