

3.2 AGRICULTURE AND FORESTRY RESOURCES

This section evaluates the potential agriculture and forestry resource impacts of the Folsom Corporation Yard SOIA/annexation project. This section describes Sacramento County's agricultural land uses; the significance, quality, and extent of agricultural land on site and within the county; and conversion of Important Farmland in the county to other uses. This section also discusses the consistency with Sacramento County and the City of Folsom's general plans and the Sacramento Local Agency Formation Commission's (LAFCo's) policies pertaining to agricultural resources as identified in Sacramento LAFCo Policies, Standards, and Procedures Guidelines (LAFCo 2007). The analysis includes a description of the existing environmental conditions, the methods used for assessment, the potential direct and indirect impacts of project implementation. Where feasible, mitigation measures are recommended to address impacts determined to be significant or potentially significant.

No comments regarding agriculture or forestry resources were received in response to the notice of preparation.

3.2.1 Environmental Setting

Sacramento County is the state's 24th largest agricultural producing county, in total value of agricultural production. The gross valuation for all agricultural commodities produced in Sacramento County was approximately \$470 million in 2015 (California Department of Food and Agriculture 2016) and \$507 million in 2016 (Sacramento County Agricultural Commission 2016). Wine grapes had the highest crop value (\$184 million) followed by milk (\$49 million), Bartlett pears (\$40 million), and poultry (\$37 million) (Sacramento County Agricultural Commission 2016).

The SOIA/annexation area is not in current agricultural production. In the past, there has been grazing in this area, but the site is currently vacant, with no grazing. As shown on Exhibits 2-4 and 2-5, the site is designated by Sacramento County as General Agricultural 80-acre (GA-80) and zoned as a Special Planning Area (SPA). No significant agricultural activities are currently present in the general vicinity. A few scattered trees are on the site, but otherwise, no forestry resources are present.

Farmland Classification

The State of California maps and classifies farmland through the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP). Classifications are based on a combination of physical and chemical characteristics of the soil and climate that determines the degree of suitability of the land for crop production. The classifications under the FMMP are as follows:

- ▲ Prime Farmland – land that has the best combination of features to produce agricultural crops;
- ▲ Farmland of Statewide importance – land other than Prime Farmland that has a good combination of physical and chemical features to produce agricultural crops, but that has more limitations than Prime Farmland, such as greater slopes or less ability to store soil moisture;
- ▲ Unique Farmland – land of lesser quality soils used to produce the state's leading agricultural cash crops;
- ▲ Farmland of Local Importance – land of importance to the local agricultural economy;
- ▲ Grazing Land – existing vegetation that is suitable for grazing;

- ▲ Urban and Built-up Land – land occupied by structures in density of at least one dwelling unit per 1.5 acres;
- ▲ Land Committed to Nonagricultural Use – vacant areas; existing land that has a permanent commitment to development but has an existing land use of agricultural or grazing lands; and
- ▲ Other Land – land not included in any other mapping category, common examples of which include low-density rural developments, brush, timber, wetland, and vacant and nonagricultural land surrounded by urban development.

According to the 2016 FMMP, the project site is classified as grazing land (Exhibit 3.2-1).

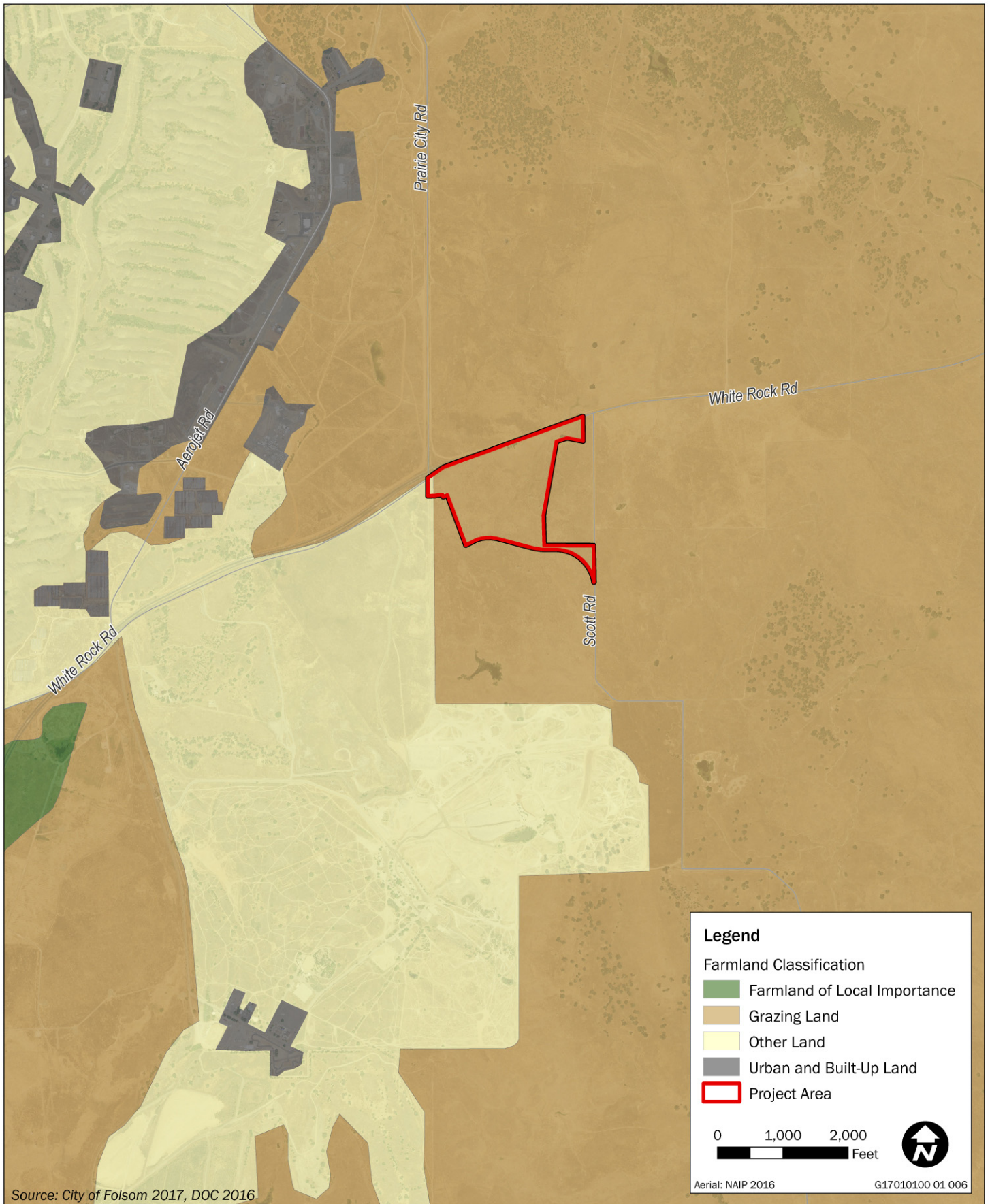
LAFCo has also established provisions for the consideration of proposed reorganization actions which utilizes a definition of agricultural lands that differ from those utilized under CEQA. Section 56064 of the Cortese-Knox-Hertzberg Local Government Reorganization Act defines “prime agricultural land” as:

“Prime agricultural land” means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service (NRCS) land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- (b) Land that qualifies for rating 80 through 100 Storie Index Rating.
- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.
- (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.

Sacramento County Farmland

In 2006, Sacramento County had 106,667 acres of Prime Farmland, 51,218 acres of Farmland of Statewide Importance, 15,267 acres of Unique Farmland, 41,960 acres of Farmland of Local Importance, and 156,979 acres of Grazing Land (FMMP 2017). By 2016, all the land use designations had decreased excluding Unique Farmland and Farmland of Local Importance. Table 3.2-1 shows the change over time in acreage of farmland from 2006 to 2016.



Source: City of Folsom 2017, DOC 2016

Exhibit 3.2-1

Farmland Classification Map



Table 3.2-1 Agricultural Land Conversion in Sacramento County

Important Farmland Category	Acres						Net Change (2006-2016)	Percent Change (2006-2016)
	2006	2008	2010	2012	2014	2016		
Prime Farmland	106,667	104,366	97,477	93,916	91,568	90,691	-15,976	-17.6%
Farmland of Statewide Importance	51,218	49,470	45,263	43,580	43,105	43,342	-7,876	-18.2%
Unique Farmland	15,267	15,463	15,076	15,060	15,125	15,540	273	1.8%
Farmland of Local Importance	41,960	43,819	53,929	56,981	58,852	57,910	15,950	27.5%
Important Farmland Subtotal	215,112	213,118	211,745	209,537	208,650	207,483	-7,629	-6.5%
Grazing Land	156,979	156,144	155,824	154,744	153,452	153,174	-3,805	-2.5%
Agricultural Land Total	372,091	369,262	367,569	364,281	362,102	360,657	-11,434	-9%

Source: FMMP 2017

The County of Sacramento has lost 2.5% of its grazing land and 9% of all its agricultural land since 2006.

Adjacent Agricultural Land Uses

The only adjacent agricultural land uses in the area include seasonal grazing land to the east of the site. However, the site is separated from this area by Scott Road. To the west and south is the Prairie City State Vehicular Recreation Area for off-highway vehicle recreation and to the north is the Folsom Plan Area Specific Plan which is currently vacant but planned for substantial development.

3.2.2 Regulatory Framework

FEDERAL

No federal plans, policies, regulations, or laws related to agriculture and forestry resources are applicable to the project.

STATE

California Department of Conservation Farmland Mapping and Monitoring Program

The FMMP was established by the State of California in 1982 to continue the Important Farmland mapping efforts begun in 1975 by the U.S. Soil Conservation Service (now called NRCS under the U.S. Department of Agriculture). The California Department of Conservation, Office of Land Conservation, maintains a statewide inventory of farmlands. Authority for the FMMP comes from Government Code Section 65570(b) and Public Resources Code Section 612. Government Code Section 65570(b) requires the Department of Conservation to collect or acquire information on the amount of land converted to or from agricultural use for every mapped county and to report this information to the Legislature. The maps are updated every 2 years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance.

California Land Conservation Act of 1965

The California Land Conservation Act of 1965, or Williamson Act (California Government Code Section 51200 et seq.), preserves agricultural and open space lands through property tax incentives and voluntary restrictive use contracts. Private landowners voluntarily restrict their land to agricultural and compatible open-space uses under minimum 10-year rolling term contracts. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value.

The owners filed a nonrenewal application for the Williamson Act contracts in February 2008. Note, cancellation action initiation was independent of, and predates, this application. The contracts expire in February 2018.

California Public Resources Code

Public Resources Code Section 21060.1 defines “agricultural land” as:

prime farmland, farmland of statewide importance or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California.

“Forest land” is defined in Public Resources Code (PRC) Section 12220(g) as:

land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

“Timberland” is defined in PRC Section 4526 as:

land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others.

“Timberland Production Zone” is defined in Government Code Section 51104(g) as:

an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, “timberland preserve zone” means “timberland production zone.”

Cortese-Knox-Hertzberg Local Government Reorganization Act

Section 56064 of the Cortese-Knox-Hertzberg Local Government Reorganization Act defines “prime agricultural land” as an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as class I or class II in the U.S. Department of Agriculture (USDA) NRCS land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- (b) Land that qualifies for rating 80 through 100 Storie Index Rating.
- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the USDA in the National Range and Pasture Handbook, Revision 1, December 2003.
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.
- (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.

As shown in Table 3.2-2 and Exhibit 3.2-2, the SOIA/annexation area is comprised of four soil types with varying suitability for agricultural production.

Table 3.2-2 Agricultural Soil Evaluation

Map Unit	Soil Type	Rating	Range Production (lbs/acre/normal year)	Acres in Project Site	Percent of Project Site
156	Hadselville-Pentz complex, 2 to 30 percent slopes	Grade 4 - Poor	1,440	7.6	13.10%
192	Red Bluff loam, 2 to 5 percent slopes	Grade 1 - Excellent	2,400	5.8	10.10%
193	Red Bluff-Redding complex, 0 to 5 percent slopes	Grade 1 - Excellent	2,310	39.4	68.20%
235	Vleek gravelly loam, 2 to 15 percent slopes	Grade 2 - Good	2,125	5.0	8.70%
Total				57.8	100.00%
Source: NRCS 2017					

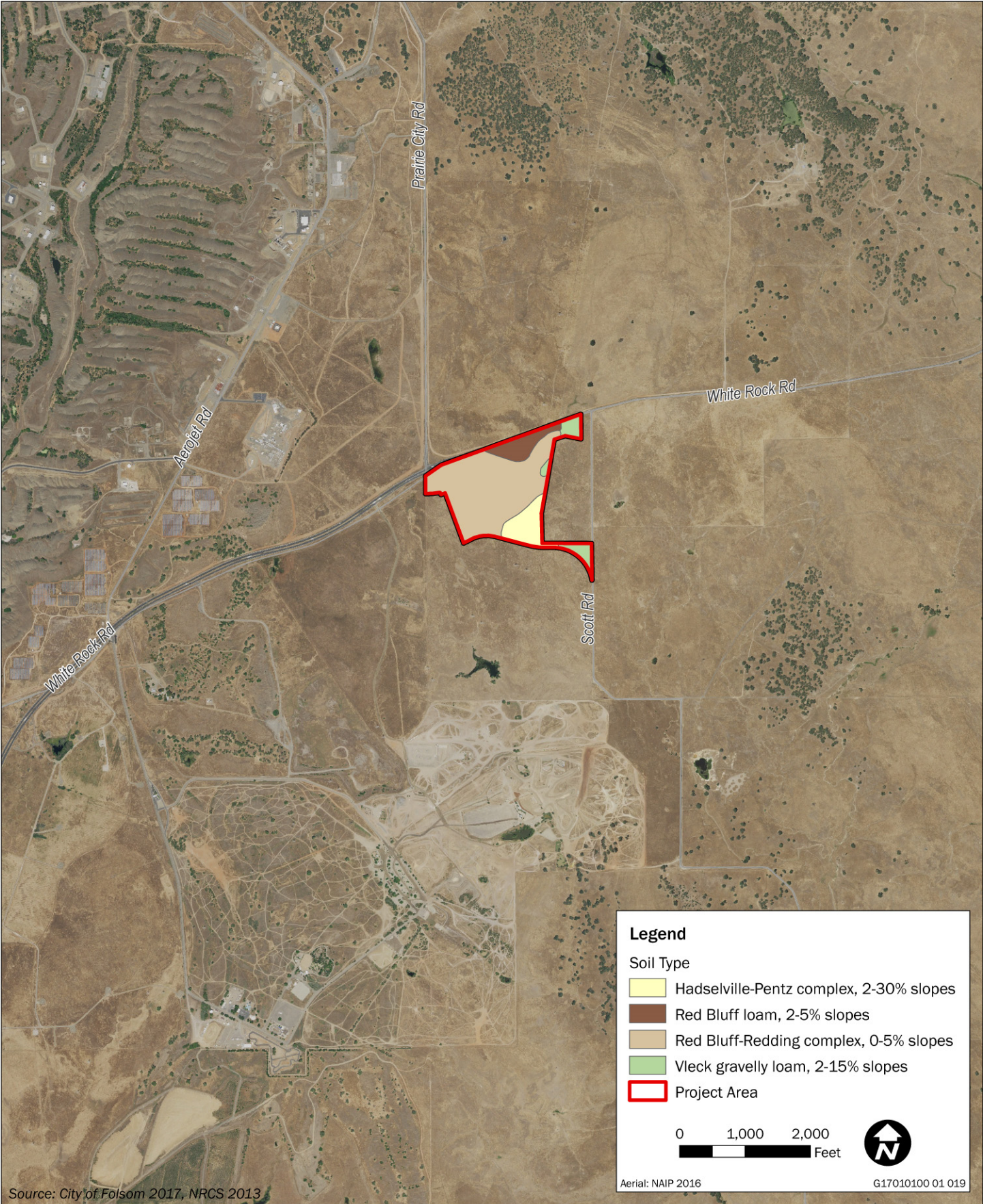
Revised Storie Index numerical ratings have been combined into six classes as follows:

- ▲ Grade 1: Excellent (81 to 100)
- ▲ Grade 2: Good (61 to 80)
- ▲ Grade 3: Fair (41 to 60)
- ▲ Grade 4: Poor (21 to 40)
- ▲ Grade 5: Very poor (11 to 20)
- ▲ Grade 6: Nonagricultural (10 or less)

Approximately 80 percent of the site is Grade 1 land and would qualify as prime agricultural land under the Cortese-Knox-Hertzberg Local Government Reorganization Act definition (b), above. Based on NRCS soil productivity data, soils in the SOIA/annexation area could produce up to 2,400 pounds of dry forage per acre per year (NRCS 2017). The USDA National Range and Pasture Handbook specifies that 1 animal unit year is equal to 9,490 pounds of dry forage per acre per year (USDA 2003). Therefore, the project site does not contain lands that could support at least one animal unit per acre. The project site is not currently or feasibly irrigated, and is not planted with fruit or nut-bearing plants or any other agricultural products.

LOCAL

The project site lies within the jurisdictional boundaries of Sacramento County; therefore, the County's policies, as well as Sacramento LAFCo's policies, would apply. Furthermore, if the SOIA and annexation are approved, the project site would be in the jurisdiction of the City of Folsom. Thus, applicable policies of the City of Folsom's General Plan are described below.



Source: City of Folsom 2017, NRCS 2013

Exhibit 3.2-2

Soils Map



Sacramento LAFCo

The project would be subject to the following standards related to agricultural resources from LAFCo's Policies, Standards, and Procedures Manual (2007). LAFCo may make exceptions to these general and specific standards if it determines that such exceptions: are necessary because of unique circumstances; are required to resolve conflicts between general and specific standards; result in improved quality or lower cost of services available; or there exists no feasible or logical alternative.

Chapter IV, Selected General Standards, Standard E. Agricultural Land Conservation. LAFCo will exercise its powers to conserve agricultural land pursuant to the following standards:

- ▲ **Standard E.1.** LAFCo will approve a change of organization or reorganization which will result in the conversion of prime agricultural land in open space use to other uses only if the Commission finds that the proposal will lead to the planned, orderly, and efficient development of an area. For purposes of this standard, a proposal leads to the planned, orderly, and efficient development of an area only if all of the following criteria are met:

 - a. The land subject to the change of organization or reorganization is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development.
 - b. The proposed development of the subject lands is consistent with the Spheres of Influence Plan, including the Master Services Element of the affected agency or agencies;
 - c. Development of all, or a substantial portion of, the subject land is likely to occur within five years. In the case of very large developments, annexation should be phased whenever feasible. If the Commission finds phasing infeasible for the specific reasons, it may approve annexation if all or a substantial portion of the subject land is likely to develop within a reasonable period of time.
 - d. Insufficient vacant non-prime lands exists within the applicable Spheres of Influence that are planned, accessible, and developable for the same general type of use.
 - e. The proposal will have no significant adverse effect on the physical and economic integrity of other agricultural lands. In making this determination, LAFCo will consider the following factors:
 - (1) The agricultural significance of the subject and adjacent areas relative to other agricultural lands in the region.
 - (2) The use of the subject and adjacent areas.
 - (3) Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of adjacent to nearby agricultural land, or will be extended through or adjacent to, any other agricultural lands which lie between the project site and existing facilities.
 - (4) Whether natural or man-made barriers serve to buffer adjacent or nearby agricultural lands from the effects of the proposed development.
 - (5) Applicable provisions of the General Plan open space and land use elements, applicable growth-management policies, or other statutory provisions designed to protect agriculture.
- ▲ **Standard E.2.** LAFCo will not make the affirmative findings that the proposed development of the subject lands is consistent with the Spheres of Influence in the absence of an approved Sphere of Influence Plan. LAFCo will not make the affirmative findings that sufficient non-prime land exists within the Spheres of Influence Plan unless the applicable jurisdiction has:

 - a. Identified within its Spheres of Influence all "prime agricultural land" as defined herein;

- b. Enacted measures to preserve prime agricultural land identified within its Sphere of Influence for agricultural use; and
- c. Adopted as part of its General Plan specific measures to facilitate and encourage infill development as an alternative to development of agricultural lands.

Chapter V, Specific Standards by Type of Action, Standard I. Amendments to Spheres of Influence

- ▲ **Standard I.6.** Amendment proposals involving Sphere expansion which contain prime agricultural land will not be approved by the LAFCo if there is sufficient alternative lands available for annexation within the existing Sphere of Influence.

Sacramento County General Plan

The following policies of the *Sacramento County 2030 General Plan* (Sacramento County 2011) are applicable to the project:

- **Policy AG-5:** Projects resulting in the conversion of more than fifty (50) acres of farmland shall be mitigated within Sacramento County, except as specified in the paragraph below, based on a 1:1 ratio, for the loss of the following farmland categories through the specific planning process or individual project entitlement requests to provide in-kind or similar resource value protection (such as easements for agricultural purposes):
 - prime, statewide importance, unique, local importance, and grazing farmlands located outside the USB; and
 - prime, statewide importance, unique, and local importance farmlands located inside the USB.

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

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

Note: This policy is not tied to any maps contained in the Agricultural Element. Instead, the most current Important Farmland map from the Department of Conservation should be used to calculate mitigation.

- **Policy CO-51:** Direct development away from prime or statewide importance farmland or otherwise provide for mitigation as required by AG-5 slowing the loss of additional farmland conversion to other uses.

The Sacramento County General Plan defines “Special Planning Areas” as:

The SPA zoning designation is designed to regulate property in areas that have unique environmental, historic, architectural, or other features that require special conditions not provided through standard zoning regulations. This designation is often used to provide for a greater range or mixture of uses in an area than would be permitted in the standard land use zones of the zoning code. Special conditions and regulations, such as a list of permitted uses, performance and development requirements relating to yards, lot area, intensity of development on each lot, parking, landscaping, and other design standards are defined in the SPA zone, as established by ordinance. Special development permits may also be issued for mixed-use developments to encourage creative and more efficient use of land; to maximize the choice in type of environment, including housing, available to the area residents; and to provide economical housing opportunities. However, depending on the specific requirements, the SPA designation could also function as a constraint on the development of low- and medium-cost housing. In practice, the use of this designation has not

constrained the provisions of affordable housing because most of the SPAs designated by the County provide for greater flexibility in the application of zoning standards. As with Neighborhood Preservation Areas, the County can use the process of establishing SPA standards to ensure that such standards do not violate state or federal requirements for affordable or special needs housing or create unreasonable constraints on the development of such housing.

City of Folsom General Plan

The City's general plan does not contain any relevant policies regarding agriculture or forestry resources.

3.2.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

While approval of the SOIA and annexation, along with changes to land use and zoning designations, would not result in physical changes to the site, approval of the SOIA/annexation would remove barriers to the development of a future corporation yard at this site. Therefore, this analysis considers the potential environmental impacts of the development of a future corporation yard.

Evaluation of the project's potential impacts on agriculture and forestry resources was based on review of the project description as well as FMMP designations of land within the site. In addition, relevant goals and policies from the Sacramento County General Plan, City of Folsom General Plan, and LAFCo were reviewed. In determining the level of significance, this analysis assumes that the project would comply with relevant state and local ordinances and regulations, as well as the adopted policies presented above.

Evaluation of the project's potential impacts on agricultural resources was based on review of the project description as well as FMMP designations of land within the project site. In addition, relevant goals and policies from the Sacramento County General Plan, City of Folsom General Plan, and LAFCo were reviewed. In determining the level of significance, this analysis assumes that the project would comply with relevant state and local ordinances and regulations, as well as the adopted policies presented above.

While the project does not include a development proposal, the analysis assumes that the SOIA/annexation site would be developed in the future, as described in the Chapter 2, "Project Description."

Sacramento LAFCo must evaluate effects on maintaining the physical and economic integrity of agricultural lands based on five factors identified in Policies, Standards, and Procedures Manual Standard E.1 below, and this EIR has considered all of the factors outlined in that policy below.

- ▲ **Factor 1.** The agricultural significance of the subject and adjacent areas relative to other agricultural lands in the region.

 - **Analysis:** Subsection 3.2.1, "Environmental Setting," identifies that the SOIA/annexation area and adjacent land areas south of the site are classified as grazing land; however, the land hasn't been grazed in years and is adjacent to a future development area to the north. The agricultural significance of this area is low as no uses are on the site and it is close to a developing area.
- ▲ **Factor 2.** The use of the subject and adjacent areas.

 - **Analysis:** The SOIA/annexation area is currently vacant with no existing active uses on site.
- ▲ **Factor 3.** Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of adjacent or nearby agricultural land, or will be extended through or adjacent to any other agricultural lands which lie between the project site and existing facilities.

- **Analysis:** If approved, the project would accommodate a future City of Folsom Corporation Yard. The City would extend water and sewer lines to serve only the site, as described in Section 3.11, Utilities and Service Systems. In addition, the project would accommodate realignment of Scott Road because of the expectation that the SouthEast Connector would be built with or without the project. Growth-inducing effects of the SOIA/annexation are addressed in Chapter 6 of this EIR, Other Sections Required by Statute.
- ▲ **Factor 4.** Whether natural or man-made barriers serve to buffer adjacent or nearby agricultural lands from the effects of the proposed development.
 - **Analysis:** The SOIA/annexation area is bounded on the north by the City of Folsom, and to the west and south by Prairie City SVRA. In addition, Scott Road will also be realigned from the west to the south of the site. Currently, Scott Road provides a manmade barrier to the east. The undeveloped agricultural land near the project site is grazing land which is not as likely to conflict with urban uses. While the development of a future corporation yard would introduce additional noise into the area, it is located near a similarly noise use (the off-highway vehicle park, as described in Section 3.9, Noise), and would not, in and of itself, cause an undue conflict for agricultural use of nearby uses.
- ▲ **Factor 5.** Applicable provisions of the General Plan open space and land use elements, applicable growth management policies, or other statutory provisions designed to protect agriculture.
 - **Analysis:** Sacramento County's Policy AG-5 requires applicants to mitigate for agricultural land conversion. This is included as a mitigation measure. There are no relevant policies for the City of Folsom.

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, the project would result in a potentially significant impact on agriculture and forest resources if it would:

- ▲ convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmlands), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agricultural use, or convert prime agricultural land as defined by the Cortese-Knox-Hertzberg Local Government Reorganization Act;
- ▲ conflict with existing zoning for agricultural use or a Williamson Act contract;
- ▲ conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));
- ▲ result in the loss of forest or agricultural land or conversion of forest land to non-forest or non-agricultural use; or
- ▲ involve other changes in the existing environment which, because of their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

ISSUES NOT DISCUSSED FURTHER

The Folsom Corporation Yard would not affect timberland or forestry resources as there are only a few trees scattered on the site. By the time the project is considered for approval, the project site will not be under Williamson Act contract nor is it zoned for Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

The site is zoned as a Special Planning Area. While the land use designation is agricultural, Special Planning Areas are not an agricultural zone. Because of this, the project would not be in conflict with existing zoning for agricultural use.

As described in Chapter 2, *Project Description*, the project has three potential access options. The evaluation of agriculture and forestry resources would not be affected by these options. Therefore, this is not discussed further in this section.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.2-1: Conversion of farmland into non-agricultural uses

The project site is categorized as farmland and the conversion of this land to a nonagricultural use would be considered a **significant** impact.

As shown on the FMMP map (Exhibit 3.2-1), above, the site is categorized as grazing land. In the FMMP program, grazing land “does not include land previously designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance, and heavily brushed, timbered, excessively steep, or rocky lands which restrict the access and movement of livestock” (DOC 2017). While grazing land is not generally considered important farmland, Sacramento County considers the loss of more than 50 acres of grazing land outside of the urban services boundary to be a significant impact. This project, along with a future corporation yard, would result in the loss of more than 50 acres of agricultural land, as defined by Sacramento County. In addition, under LAFCo’s definition, this land would be considered prime farmland because it contains a majority of land classified between 80 and 100 on the Storie Index. Therefore, any loss of land of this type would be considered by LAFCo to be a **significant** impact.

Mitigation Measure 3.2-1: Farmland preservation.

Consistent with Sacramento County General Plan Policy AG-5, the City will provide in-kind or similar resource value protection for land similar to the project site. This protection may consist of the establishment of farmland easements, or other similar mechanism and shall be implemented prior to issuance of the first grading permit for development.

Significance after Mitigation

While implementation of Mitigation Measure 3.2-1 could reduce the impact on farmland by preserving forever a similar acreage and type of farmland, once farmland is removed through development, it is irretrievably lost to future generations. Therefore, the impact would remain **significant and unavoidable**.