4.2 AGRICULTURAL RESOURCES

4.2.1 INTRODUCTION

This section describes the existing on-site and surrounding agricultural resources and evaluates the potential effects of the proposed project on agricultural resources.

4.2.2 ENVIRONMENTAL SETTING

The 144.2-acre state-owned project site is located on the site of the closed Karl Holton Youth Correctional Facility and on approximately 70 acres of actively cultivated field, where a local farmer grows squash.

REGIONAL OVERVIEW

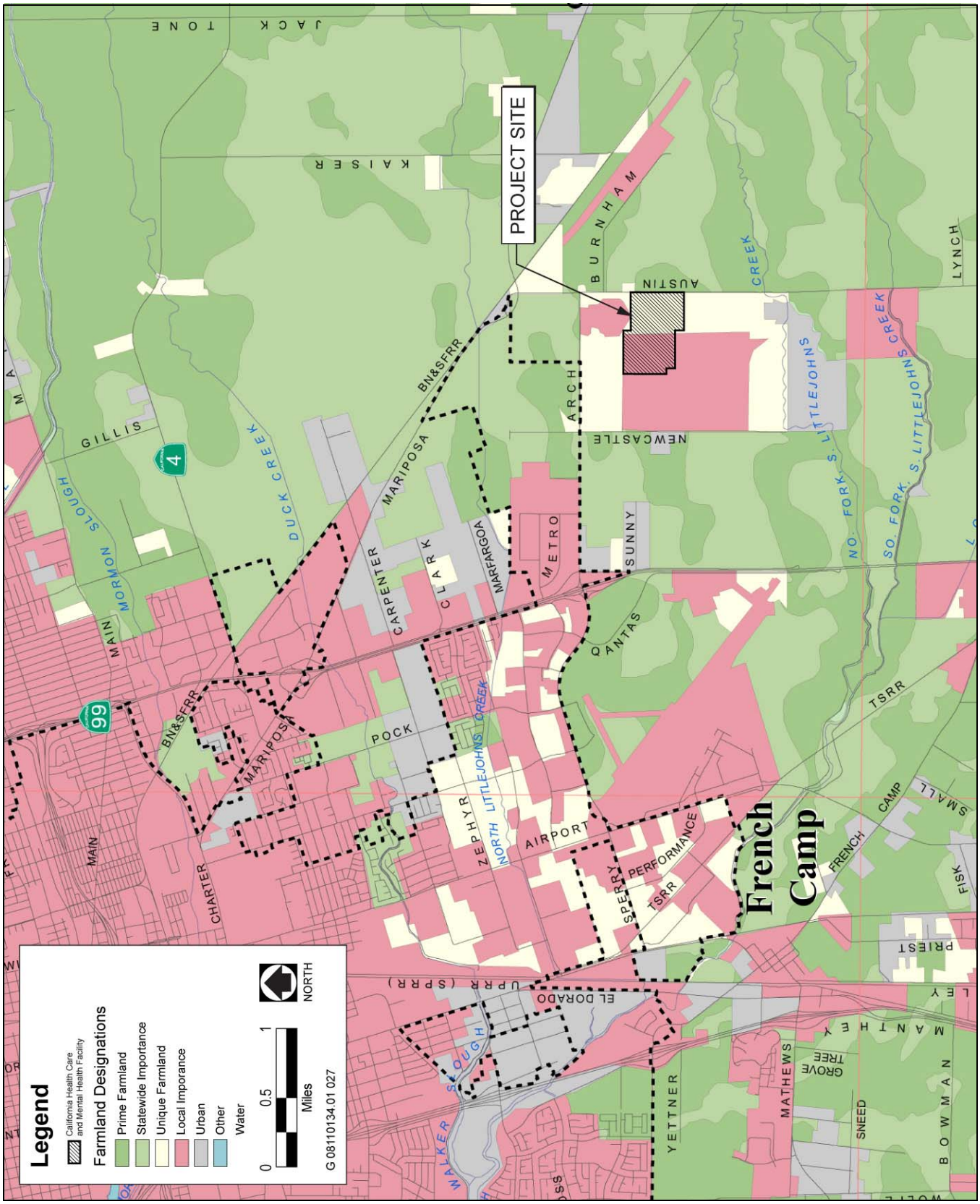
Agriculture has been and remains an important part of San Joaquin County's economy. An estimated 4,000 farms are located within the county, covering some 1,400 square miles. The general trend in agriculture has been toward less acreage harvested, but higher product values. Total gross values reached an estimated $1.6 billion in 2004, ranking San Joaquin County seventh in the state in agricultural production. The top five crops in 2004 were milk, grapes, almonds, tomatoes, and cherries.

SOIL TYPES AND LAND CAPABILITY CLASSIFICATION

Soils within the project site have been classified by the Soil Conservation Service (SCS) (now Natural Resources Conservation Service [NRCS]) of the U.S. Department of Agriculture in the *Soil Survey of San Joaquin County* (SCS 1992). Two soil types are located within the field on the project site: Jacktone clay and Stockton clay (see Exhibit 4.9-1 in Section 4.9, "Geology and Paleontology"). Land capability classification is a system of grouping soils primarily on the basis of their capability to produce common cultivated crops and pasture plants without deteriorating over a long period of time. Jacktone clay, which makes up approximately 15% of the soils in the cultivated field, has a capability class rating of "IIIs" when it is irrigated. As defined in the *National Soils Survey Handbook*, Class III soils have severe limitations that reduce the choice of plants or require special conservation practices, or both (NRCS 2007:Part 622.02(e)(1)(ii)). Subclass "s" is made up of soils that have soil limitations within the rooting zone, such as shallowness of the rooting zone, stones, low moisture-holding capacity, low fertility that is difficult to correct, and salinity or sodium content (NRCS 2007:Part 622.02(e)(2)(ii)). Stockton clay, which makes up approximately 85% of the soils in the cultivated field, has a capability class rating of "IIs" when irrigated. Class II soils have moderate limitations that reduce the choice of plants or require moderate conservation practices (NRCS 2007:Part 622.02(e)(1)(ii)). Additional soils information is provided in Section 4.9, "Geology and Paleontology."

IMPORTANT FARMLAND

The types of Important Farmland (Exhibit 4.2-1) included in the Important Farmland Inventory System, maintained by the Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation's (CDC's) Division of Land Resource Protection, are defined below in the discussion of state regulations in Section 4.2.3, "Regulatory Considerations." No Prime Farmland or Farmland of Statewide Importance occurs on the project site. The closed Karl Holton Youth Correctional Facility is mapped as "urban" land on the San Joaquin County Important Farmland 2004 map based on the FMMP (San Joaquin County 2007), and the cultivated field is mapped as "Farmland of Local Importance." Farmland of Local Importance is not identified as Important Farmland in Appendix G of the State *CEQA Guidelines*, but by virtue of its score when the Land Evaluation Site Assessment (LESA) methodology is applied as described below, the site would be considered Important Farmland for purposes of CEQA (PRC Section 21095).



Source: California Department of Conservation 2004

Farmland Map **Exhibit 4.2-1**

Table 4.2-1 Agricultural Soils on the Project Site		
Soil Name	Capability Class	Classification
180 Jacktone Clay	IIIs, irrigated	Farmland of Local Importance
250 Stockton clay	IIs, irrigated	Farmland of Local Importance
Source: SCS 1992		

FARMLAND SIGNIFICANCE

The LESA model, developed by CDC and described below in the discussion of state regulations in Section 4.2.3, "Regulatory Considerations," was used to determine the significance of the cultivated field east of the closed Karl Holton Youth Correctional Facility. Two metrics are included in the LESA model: the Land Evaluation, based on the soils located on the site; and the Site Assessment, based on the size of the site, reliability of water resources, surrounding land uses, and surrounding protected agricultural lands. These metrics are combined and weighted to result in a final combined LESA score of 0–100 points, as described in Section 4.2.3 below. Because Jacktone clay and Stockton clay on the project site are capable of being irrigated, the capability classification score is 77.07. They have a combined Storie Index score of 40. The project site scored 70 for site size, 90 for water reliability, 70 for surrounding land uses, and 10 for surrounding protected agricultural lands.

As explained below, because the subtotals for both the Land Evaluation and the Site Assessment exceeded 20 points and the weighted LESA point total was between 60 and 79 points, the project site is considered significant farmland.

4.2.3 REGULATORY CONSIDERATIONS

FEDERAL PLANS, POLICIES, REGULATIONS, AND LAWS

Federal Farmland Protection Policy Act

NRCS is the agency primarily responsible for implementing the federal Farmland Protection Policy Act (FPPA) (Part 7, Section 658 of the Code of Federal Regulations [7 CFR 658]). The purpose of the FPPA is to minimize federal contributions to the conversion of farmland to nonagricultural uses by ensuring that federal programs are administered in a manner compatible with state, local, and private programs designed to protect farmland. The FPPA established the LESA system.

As described below in the discussion of state regulations, the LESA system helps state and local officials make sound decisions about land use by quantitatively evaluating the significance of farmland. Division 13, Chapter 1, Section 21095 of the California Public Resources Code states that LESA may be used by the lead agency to determine whether the conversion of the farmland would be a significant impact.

Land Capability Classification System

The Land Capability Classification System developed by SCS (now NRCS) takes into consideration soil limitations, the risk of damage when the soils are used, and the way in which soils respond to treatment. Soil capability classes range from Class I soils, which have few limitations for agriculture, to Class VIII soils, which are unsuitable for agriculture.

STATE PLANS, POLICIES, REGULATIONS, AND LAWS

California Important Farmland System and Farmland Mapping and Monitoring Program

CDC's Division of Land Resource Protection operates the FMMP, a program similar to the federal program described above under "Federal Farmland Protection Policy Act." The FMMP was established in 1982 by the state to continue the Important Farmland mapping efforts begun in 1975 by NRCS, which aimed to produce agricultural resource maps based on soil quality and land use across the nation. CDC's system was designed to inventory, map, and monitor the acreage of California farmland to document how much agricultural land was being converted to nonagricultural land or transferred into (or out of) Williamson Act contracts. CDC's classifications in the Important Farmland Inventory System are as follows:

- Prime Farmland—Land that has the best combination of features for the production of agricultural crops
- Farmland of Statewide Importance—Land other than Prime Farmland that has a good combination of physical and chemical features for the production of 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 for the production of 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 to 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
- Other Land—Land that does not meet criteria of the remaining categories

Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are defined as Important Farmland in Appendix G of the State *CEQA Guidelines*.

Land Evaluation Site Assessment Model

The LESA model was developed in compliance with PRC Section 21095 of CEQA, which directed the California Resources Agency to develop "…an optional methodology to ensure that significant effects on the environment of agricultural land conversion are qualitatively and consistently considered in the environmental review process." The LESA model considers several factors: potential soil suitability for agriculture, accessibility of irrigation, location of the area to existing preserved agricultural lands, and economic viability as an agricultural use.

As described above, the model includes two metrics: a Land Evaluation and a Site Assessment. The Land Evaluation is based on the soils located on the site, and the Site Assessment is based on the size of the site, reliability of water resources, surrounding land uses, and surrounding protected agricultural lands. These two metrics are combined and weighted to result in a final LESA score of 0–100 points, based on a maximum score of 50 points each for the Land Evaluation and Site Assessment components. The following conclusions are reached based on these scores

- Land that scores between 0 and 39 points is not considered significant farmland.
- Land that scores between 40 and 59 points is considered significant only if both the Land Evaluation and Site Assessment totals are equal to or greater than 20 points.
- Land that scores between 60 and 79 points is considered significant unless either the Land Evaluation or the Site Assessment scores is less than 20 points.
- Land is always considered significant farmland if the LESA score is equal to or exceeds 80.

California Land Conservation Act (Williamson Act)

The California Land Conservation Act (Williamson Act) (California Government Code Section 51200 et seq.), administered by CDC, was enacted in 1965 when population growth and rising property taxes were recognized as a threat to the viability of valuable farmland in California. The State is not subject to the Williamson Act. None of the project site is under a Williamson Act contract.

LOCAL PLANS, POLICIES, REGULATIONS, AND ORDINANCES

San Joaquin County Right-to-Farm Ordinance

As required by Agricultural Lands Implementation Policy 2 in the *San Joaquin County General Plan 2010* (San Joaquin County 1992), the San Joaquin County Right-to-Farm Ordinance was adopted to preserve, protect, and encourage the development and improvement of agricultural land in San Joaquin County for the production of food and other agricultural products. The purpose of the ordinance is to reduce the loss of the county's commercial agricultural resources by limiting the circumstances under which agricultural operations may be deemed to constitute a nuisance. Existing agricultural lands (in operation for more than 1 year) may not be considered a nuisance as a result of subsequently changed conditions in the area, such as urbanization. Under San Joaquin County's current ordinance, applicants for building permits are provided a disclosure statement regarding the Right-to-Farm Ordinance, but there is no mandatory process for notifying prospective property owners. The goal of disclosure is to inform the buyer or owner of the presence of possible irritants, like tractor noise and odors, to prevent future nuisance complaints.

San Joaquin County General Plan 2010

The following objectives and policies in the adopted *San Joaquin County General Plan 2010* relating to agricultural resources are applicable to the proposed project.

Open Space—Agricultural Lands

- **Objective 1:** To protect agricultural lands needed for the continuation of commercial agricultural enterprises, small-scale farming operations and the preservation of open space.
- **Objective 2:** To recognize agricultural lands that contain concentrations of small-scale agricultural operations and dwellings.

- **Objective 3:** To minimize the impact on agriculture in the transition of agricultural areas to urban development.

    - **Policy 8:** To protect agricultural land, non-agricultural uses which are allowed in the agricultural areas should be clustered, and strip or scattered development should be prohibited.

    - **Policy 9:** Agriculture shall be protected from nuisance complaints from non-agricultural land uses by appropriate regulatory and land use planning mechanisms.

    - **Policy 10:** Non-agricultural land uses at the edge of agricultural areas shall incorporate adequate buffers (e.g., fences and setbacks) to prevent conflicts with adjoining agricultural operations.

City of Stockton Right-to-Farm Ordinance

The City of Stockton (City) Agricultural Preservation Ordinance, known as the Right-to-Farm Ordinance, was adopted to preserve the use of agricultural land for agricultural production, support the right of persons to farm, limit the circumstances under which an agricultural operation can be considered a nuisance, and advise property owners adjacent to agricultural lands of the inherent conflicts that may occur as a result of living near agricultural operations.

A disclosure statement is required whenever adjacent property is sold or building permit applications are submitted, notifying the buyer about adjacent agricultural land and possible discomforts related to agricultural operations. In addition, each tentative subdivision map for property adjacent to agricultural operations must contain a deed restriction waiving the owners' right to complain about or file an action concerning farming operations and practices.

CITY OF STOCKTON GENERAL PLAN 2035

As described in "Land Use" (section 4.1.3), The 2035 land use diagram shows that the City of Stockton plans to expand the city limits to include the project site and designates the project site "Institutional." All lands surrounding the project site have been designated for Industrial uses. Therefore, there are no agricultural resources goals or policy relevant to the project site.

San Joaquin County Multi-Species Habitat Conservation and Open Space Plan

The *San Joaquin County Multi-Species Habitat Conservation and Open Space Plan* (SJMSCP) is a 50-year plan to provide a strategy for balancing the projected development of more than 109,300 acres of existing open space with the preservation of the agricultural economy, open space, and habitat for several endangered species in San Joaquin County (SJCOG 1999:1). The SJMSCP calls on a joint powers authority (JPA) to collect development fees from the participating permitted agencies or third-party participants. To preserve the agricultural economy, the JPA invests the development fees in obtaining conservation easements or fee-to-trust entitlements on up to 57,635 acres of existing agricultural land (SJCOG 1999:4). CPR is not a participating permitted agency under the SJMSCP, and as a state agency developing state property, CPR is not required to contribute to the SJMSCP fund. If CPR desires to participate, it may do so as a third party upon concurrence of the JPA that the project is consistent with the definition of major impact projects (SJMSCP, Section 8.2.1.5.C). Major impact projects are defined as, among other things, "airports, sanitary landfills, hazardous waste disposal sites, and correctional institutions" (SJCOG 1999:8-18).

4.2.4 IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE CRITERIA

In accordance with Appendix G of the State *CEQA Guidelines*, an impact of the proposed project related to agricultural resources would be considered significant if project implementation would:

- convert Important Farmland to nonagricultural use;
- conflict with existing zoning for agricultural use or a Williamson Act contract; or
- involve other changes in the existing environment that, because of their location or nature, could result in conversion of farmland to nonagricultural use.

PROJECT IMPACTS AND MITIGATION MEASURES

IMPACT AG-1 Conversion of Significant Farmland to a Nonagricultural Use. *The proposed project would convert approximately 70 acres of actively cultivated land considered significant farmland that has also been designated Farmland Local Importance to a nonagricultural, institutional land use, the loss of which cannot be replaced. (Significant and unavoidable)*

The approximately 70-acre field east of the closed Karl Holton Youth Correctional Facility and bounded by Austin Road is actively cultivated farmland. The LESA model conducted for the site resulted in a total LESA score of 64 points. The Land Evaluation subtotal for the site was 29 points and the Site Assessment subtotal was 35 points. Therefore, the site is considered significant farmland. Although the field is considered Farmland of Local Importance, by virtue of its LESA score, the site is considered Important Farmland for purposes of CEQA (PRC 21095). The proposed project consists of converting the significant farmland to nonagricultural, institutional land uses. Therefore, this impact would be significant.

Mitigation Measure(s) for Impact AG-1:

CPR will implement Mitigation Measure for Impact BIO-1 (See Section 4.7 of the Draft EIR "Biological Resources"), which, in part, requires third-party participation in the SJMSCP and payment of the Natural Lands and Agricultural Habitat Lands Fee as defined in SJMSCP Section 7.4.1.2, "Agricultural Habitat Lands, Non-Vernal Pool Natural Lands, and Multipurpose Open Space Lands." The SJMSCP Joint Powers Authority will determine the fee amount to be paid based on the acreage of disturbance. The total amount could be up to 153.2 acres.

Significance after Mitigation

To reduce the significance of the conversion of significant farmland to a less-than-significant level, existing nonagricultural land uses in San Joaquin County such as habitat or urban uses would need to be converted to significant farmland. Converting urban uses to farmland is not feasible because it is not consistent with San Joaquin County's land use planning goals, objectives, and policies for the orderly development of the county. Further, such conversions would likely themselves have significant impacts, such as impacts on water and air quality from grading activities, or disruption of traffic patterns. Converting habitat to agriculture would result in significant impacts on the species reliant on the habitat.

The SJMCSP provides an opportunity for the conservation of up to 57,635 acres of existing agricultural land in the county. Implementation of mitigation measures for Impact BIO-1 would provide funding for the conservation of up to 153.2 acres of existing natural and agricultural habitats. This money is pooled by the SJCOG and used to purchase conservation easements and to implement the various measures within the MSCP. The fee would

conserve a like amount of land (153.2 acres) as would be developed. This is twice the agricultural acreage that would be converted by the project. However, although participation in the SJMCSP would limit future farmland conversion in San Joaquin County, it would not result in the replacement of the 70 acres converted by the project. Therefore, conversion of significant farmland and farmland designated Farmland of Local Importance to a nonagricultural use would be a significant and unavoidable impact.

IMPACT AG-2 Conflict with Existing Agricultural Zoning. *The proposed project would locate a medical and mental health care facility near existing agricultural uses to the east of the project site. San Joaquin County's Right-to-Farm Ordinance provides a mechanism to protect the ongoing agricultural practices of the adjacent properties. Although the state is not subject to local ordinances, the setbacks between project facilities and adjacent agriculture are sufficient to avoid substantial conflicts with agricultural uses. (Less than significant)*

The project site is currently zoned Public Facilities by San Joaquin County, and lands east of the project site across Austin Road are zoned Agriculture 40 Acres. Properties adjacent to the project site to the east are covered under San Joaquin County's Right-to-Farm Ordinance, although the state is exempt from complying with local ordinances. Existing and ongoing agricultural practices would be allowed to continue without restriction, although certain pesticide application may be limited within one-quarter mile of the nearest facility. However, considering that the agricultural property east and south of the project site is extensive, and that many pesticides are available without such restrictions, this would not limit the agricultural productivity of these properties.

Certain agricultural practices can be a nuisance to sensitive receptors such as the patients in the proposed health care facility. Nuisances could include noise from trucks, tractors, and airplanes; dust; and pesticides. As currently shown on the site plan, the project proposes to locate the parking areas between the health care facilities and Austin Road. The agricultural practices east of Austin Road would occur approximately 300 feet from the proposed health care facility. Therefore, this impact would be less than significant.

Mitigation Measure(s) for Impact AG-2:

No significant impacts would occur, so no mitigation measures are required.

IMPACT AG-3 Conversion of Off-site Farmland. *Lands surrounding the site are located in the City of Stockton's urban services boundary and are designated for industrial land use in the land use diagram of the City of Stockton General Plan 2035. The conversion of farmland has been planned for and evaluated, and the project is not expected to result in unanticipated farmland conversion. (Less than significant)*

The project site and surrounding lands are located in the City's proposed urban services boundary. The City expects to annex the project site and the surrounding lands by the year 2035. Based on this expectation, the City has designated the surrounding lands for industrial development. Infrastructure improvements included in the proposed project may facilitate development of the surrounding lands with the planned industrial development. However, the project is not expected to result in development pressure on existing farmlands in addition to the anticipated industrial development. Therefore, this impact would be less than significant.

Mitigation Measure(s) for Impact AG-3:

No significant impacts would occur, so no mitigation measures are required.