4.1 AGRICULTURAL RESOURCES

This section assesses the extent to which development of the proposed project would adversely affect important agricultural resources, conflict with adopted agricultural preservation policies, and conflict with agricultural zoning designations. Where impacts are identified, feasible mitigation measures are recommended.

4.1.1 ENVIRONMENTAL SETTING

The project site is located approximately 2 miles east of State Route 99, in the southeast corner of the City of Merced. The eastern boundary of the project site is the current city limits. Land immediately to the south, north, and west of the site is also within the city limits. Land immediately to the east is in unincorporated Merced County, but is within the City of Merced's (City's) sphere of influence. The project site is designated Industrial in the City General Plan and Heavy Industrial District in the zoning ordinance. The site has historically been used for agriculture.

The project site has most recently been used to grow almonds and alfalfa. The entire 230-acre project site consists of agricultural land. The western one-third of the site contains an almond orchard, and the eastern two-thirds consist of agricultural fields. The northern, southern, and part of the northeastern boundary of the fields contain irrigation ditches, which connect to the Wilson Substation.

Undeveloped open lands and commercial lands are located to the north of the project site. An orchard and a Merced Irrigation District (MID) canal are located west of the site. A few rural residential dwelling units are located across Tower Road to the east and Gerard Avenue to the south. Land east of Tower Road is designated Agriculture in the City General Plan. Land to the north, west, and south is designated Industrial.

SOIL RESOURCES

The type of agricultural activity that occurs in Merced County is dependent, in part, on the capability of the soil for supporting agriculture. The soil types and their corresponding agricultural suitability classifications are discussed below.

Soil Type

The majority of the soils on the project site are Wyman loam soils, totaling approximately 58%. The three types of Wyman soils span from the northwest corner of the project area, along Childs Avenue on the north boundary of the project area, then southerly through the mid-eastern region of the site, eventually spanning to the eastern and western boundaries in the southern region of the project site. The Wyman series consists of deep, well-drained soils that formed in alluvium from andesitic and basaltic rocks. Wyman soils are on terraces and alluvial fans that range from nearly level to strongly sloping and have slopes of 0 to 15%. The Wyman series is used extensively for orchard and truck crops, but some areas are used for vineyards, grain, alfalfa, and clover.

Landlow silty clay loam makes up 23% of the project site and is located in the central and mid-western region of the project site. Landlow soils are on nearly level basins of valley plains at elevations of 25–150 feet. These soils formed in moderately fine textured alluvium. These soils are often used to cultivate rice, field crops, and row crops.

Yokohl clay loam is located in the mid-western region and in a small area along the northern boundary in the central region of the project site. The Yokohl soils occur on gently sloping old fans and terraces on alluvium from primarily basic igneous rock. Soils are well drained. Runoff is very slow to rapid and permeability is slow to very slow.

Honcut silty clay loam is located in the northeast corner, with a small pocket of Porterville clay directly south along the eastern boundary of the project site. Honcut soils are highly productive under irrigation. Honcut soils are on floodplains and alluvial fans at elevations less than 2,000 feet. The Porterville series consists of deep, well-drained soils that formed in fine textured alluvial material from basic and metabasic igneous rock. Porterville soils are on fans and foothills and have slopes of 0 to 15%.

Table 4.1-1 shows the acreage and percentage of associated soil types located on the project site.

Table 4.1-1
Soil Types in the Project Area

Soil Type	Acreage Percentage	Acreage
Honcut silty clay loam, 0 to 1% slopes	3.53	8.12
Landlow silty clay loam, 0 to 1% slopes	22.44	51.61
Porterville clay, 0 to 3% slopes	7.39	17.00
Wyman clay loam, 0 to 3% slopes	18.90	43.47
Wyman clay loam, deep over hardpan, 0 to 1% slopes	29.04	66.79
Wyman loam, 0 to 3% slopes	13.59	31.26
Yokohl clay loam, 0 to 3% slopes	5.11	11.75
Total	100.00	230.00

Source: NRCS 2006

Soil Classification

The Natural Resources Conservation Service (NRCS) classifies soils by eight categories ranging from Class I to Class VIII. Classes V through VIII are less suitable for most types of agricultural production than are Classes I through IV. These classes are further delineated into subsets based on other site characteristics. The following is a brief description of the eight categories as defined by the NRCS:

- **Class I soils** have few limitations that restrict their use. These soils are typically used for vegetables, seed crops, orchards, and other irrigated specialty crops and irrigated field crops.

- **Class II soils** have minor-to-moderate limitations that reduce the choice of plants or that require moderate conservation practices. Uses are very similar to those found on Class I soils.

- **Class III and IV soils** have severe-to-very severe limitations that reduce the choice of plants, require special conservation practices, or require very careful management. In some cases, the Class III soils may be used for some of the crop types that are typically found on Class I and Class II soils, but are more typically used for specialty crops, forage lands, mixed croplands, and dryland field crops. Irrigated Class IV soils are commonly used for vineyards.

- **Class V soils** are not likely to erode but have other limitations, impractical to remove, that limit their use. These soils are not found in Merced County.

- **Class VI soils** have severe limitations that make them generally unsuited to cultivation and limit 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, water supply, or aesthetic purposes.

Certain soil types correlate with soil classifications. No one soil type dominates the project site, but there is more Wyman clay loam than any other soil type. Several soils comprise different sizable swaths of the project site. The following soils and their classes are present on the project site:

- Honcut silty clay loam, 0 to 1% slope (HwA), Class I-1
- Landlow silty clay loam, 0 to 1% slopes (LeA), Class IIIw-2
- Porterville clay, 0 to 3% slopes (PwA), Class IIIs-5
- Wyman clay loam, deep over hardpan, 0 to 1% slopes (WnA), Class IIs-3
- Wyman clay loam, 0 to 3% slopes (WoA), Class I-1
- Wyman loam, 0 to 3% slopes (WrA), Class I-1
- Yokohl clay loam, 0 to 3% slopes (YbA), IVs-3

4.1.2 REGULATORY SETTING

The U.S. Department of Agriculture and California Department of Conservation (DOC) monitor conversion of farmland and develop methods of categorizing farmland according to its overall agricultural capacity. The State of California has developed farmland preservation programs, such as the Williamson Act to protect ongoing operations from urbanization due, in large part, to increases in land values. Merced County and the City of Merced have recognized the important value of agriculture, and have established policies to preserve farmland and encourage the viability of agricultural operations. Key aspects of the regulatory setting are described below.

CLASSIFYING FARMLAND

DOC develops programs to protect agricultural resources of the state and track conversion of agricultural land. Concern about the loss of important farmland led DOC to develop the Farmland Mapping and Monitoring Program, which classifies different agricultural soil types relating to their ability to sustain agricultural crops. The following categories are used:

- ***Prime Farmland*** is land with the best combination of physical and chemical features for the long-term production of agricultural crops. This land can economically produce sustained high yields when treated and managed according to modern farming methods.

  According to NRCS, "prime farmland" is of major importance in meeting the nation's short- and long-range needs for food and fiber. Because the supply of high-quality farmland is limited, the U.S. Department of Agriculture recognizes that responsible levels of government, as well as individuals, should encourage and facilitate the wise use of our nation's prime farmland

- ***Farmland of Statewide Importance*** is land with a good combination of physical and chemical features, but with minor shortcomings, such as greater slopes or less ability to hold and store moisture.

- ***Unique Farmland*** is land of lesser quality soils used for the production of the state's leading agricultural cash crops. Unique farmland is not based on national criteria. It is commonly found in areas where there is a special microclimate, such as the wine country in California.

- ***Farmland of Local Importance*** is pasture land and other agricultural land identified by the local jurisdiction as being important.

CEQA (Appendix G) defines "Farmland", for purposes of evaluating impacts, as land classified by DOC as Prime, Unique, or Farmland of Statewide Importance. According to DOC, Merced County currently has 535,562 acres of Farmland (as of 2004). In the period between 2000 and 2004, 7,149 acres of Prime Farmland and 3,345 acres of Farmland of Statewide Importance were lost, and, 71 acres of Unique Farmland was gained in Merced County, for a net loss of 10,423 acres over this four-year period. This equals 2% of the total Farmland (as defined by CEQA) in Merced County.

As shown in Exhibit 4.1-1, a majority of the project site consists of Prime Farmland. A large section of the western half of the site consists of Farmland of Statewide Importance, while smaller sections on the western and northern ends of the site consist of Unique Farmland. The entire site consists of Farmland, as defined by CEQA. Table 4.1-2 shows the acreage and percentage of farmland located on the project site according to the Farmland Mapping and Monitoring Program.

Table 4.1-2
Important Farmland in the Project Area

Farmland Type	Acreage	Acreage Percentage
Prime Farmland	158.20	69.19
Farmland of Statewide Importance	57.87	25.29
Unique Farmland	12.61	5.51
Total	228.68	100

NUISANCE ISSUES

Urban encroachment on agricultural areas introduces issues such as land use conflicts, vandalism, increased land values and taxes, and other issues. The state recognized potential land use conflicts, and through Assembly Bill 1190 (Chapter 97, Statutes of 1992) attempted to avoid impacts on agricultural operations associated with urban uses "coming to a nuisance." By amending provisions of the California Civil Code, under Assembly Bill 1190, existing agricultural processing facilities do not constitute a nuisance, provided they operate in a manner consistent with historic operations.

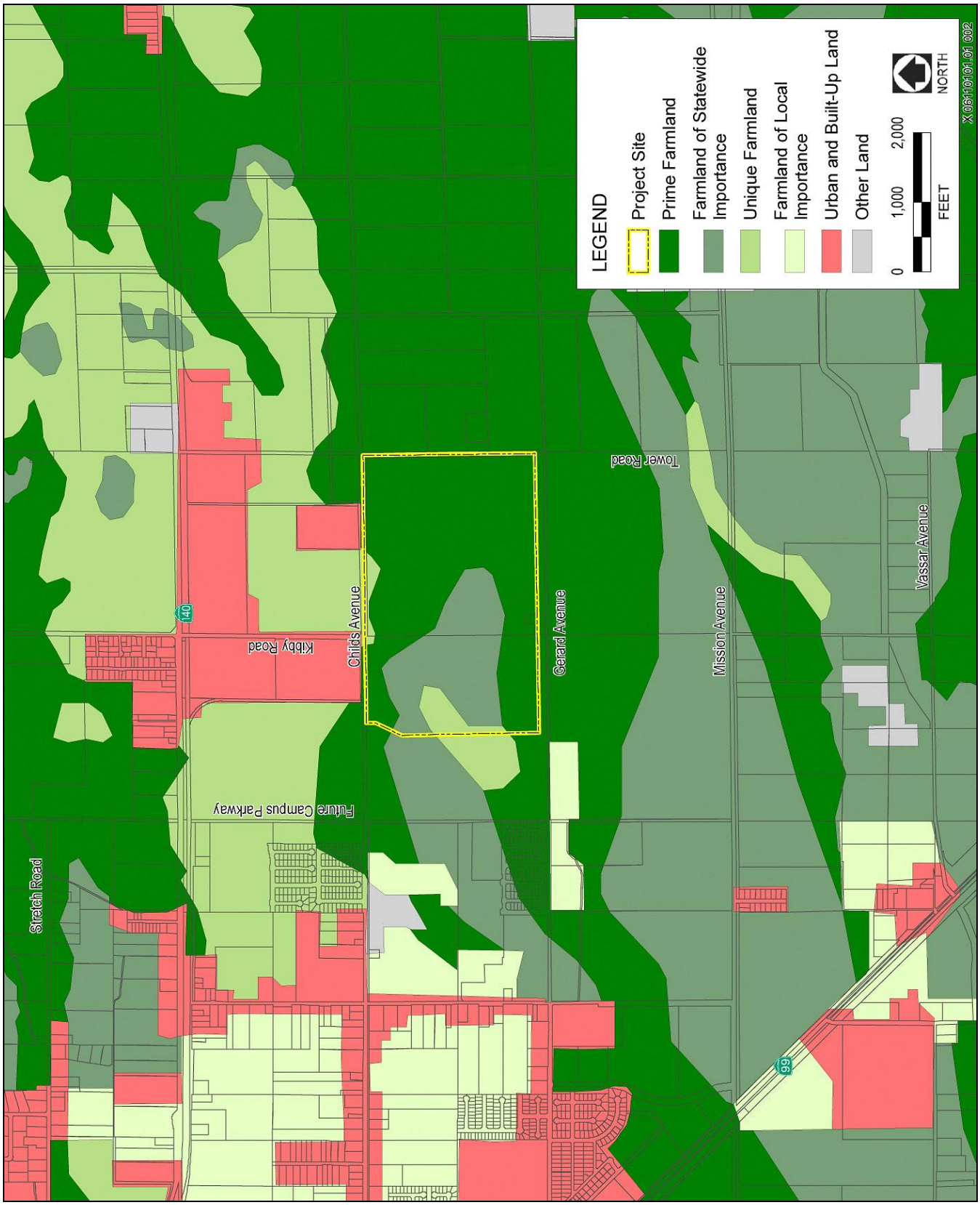
WILLIAMSON ACT PROGRAM

The Williamson Act establishes a mechanism for contracts between local governments and private landowners, restricting parcels of land to agricultural or related open space use. Landowners are taxed on the capitalization of the income from the land rather than the fair market value, and local governments receive an annual subvention of forgone property tax revenues from the state via the Open Space Subvention Act of 1971. In return, the landowner retains their land in open space or agricultural use for at least 10 years. Land can be withdrawn from a Williamson Act contract through a 10-year process beginning with a nonrenewal filing, during which taxes gradually increase to full levies. In extraordinary, unforeseen situations, immediate termination is sometimes granted. No Williamson Act contract currently applies to the project site, but, as can be seen in Exhibit 4.1-2, a Williamson Act property is adjacent to the site to the east.

CITY AGRICULTURAL POLICIES

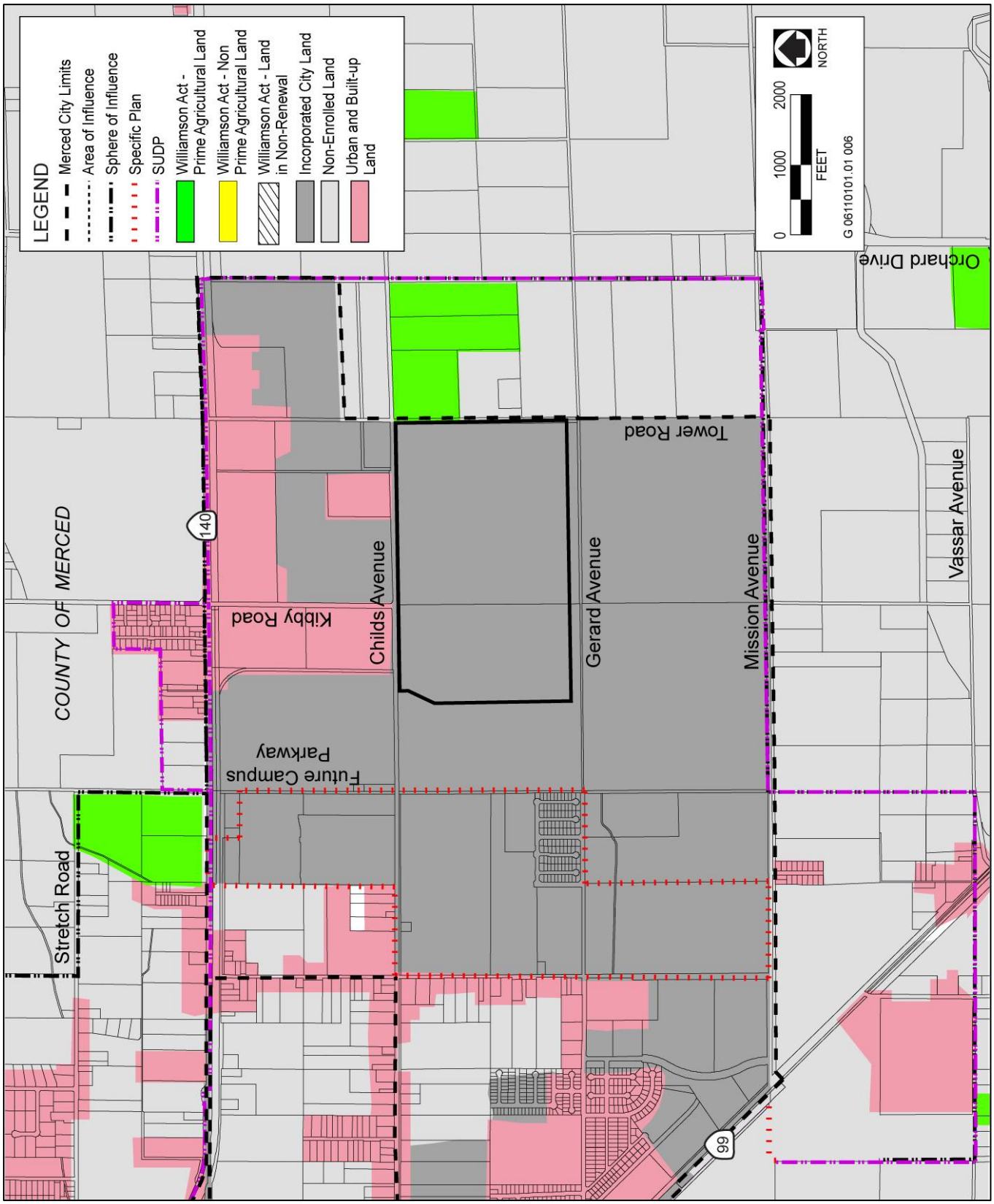
Neither the project site nor any of the land within the city limits surrounding or near the project site is designated agricultural by the City General Plan or zoning ordinance., but there is land on the south side of Childs Avenue approximately 1,500 feet west of the site that is zoned Restricted Agriculture (A-1-20); this land, however, is designated Business Park by the *Merced Vision 2015 General Plan* (City of Merced 1997).

The following are goals and policies from the *Merced Vision 2015 General Plan* related to agriculture.



Source: FMMP 2006

Important Farmland in the Project Area **Exhibit 4.1-1**



Source: Adapted by EDAW 2007

Williamson Act Lands in Project Vicinity **Exhibit 4.1-2**

Conversion of Prime Agricultural Land to Nonagricultural Uses (Various Policies)

- Promote a compact urban form to minimize loss of agricultural crop land in the region. (Chapter 2, "Urban Expansion," Policies UE-1.1 and 1.2; Chapter 3, "Land Use," Policy 3.2; Chapter 6, "Urban Design," Policies UD-1.1, 1.4, 1.5, 2.1 and 2.2; Chapter 7, "Open Space," Policies OS-2.2 and 4.1)

Urban Expansion Element Goals

- Designate areas for new urban development that recognize the physical characteristics and environmental constraints of the planning area. (Policy UE-1.1)

Open Space, Conservation, and Recreation Element Goals

Protect agricultural areas outside the City's SUDP [specific urban development plan] from urban impacts. (Policy OS 2.1)

Relieve pressures on converting areas containing large concentrations of "prime" agricultural soils to urban uses by providing adequate urban development land within the Merced City SUDP. *(Generally, overly restrictive growth and development policies within a city can translate into increased development pressure on rural areas. The City of Merced is committed to providing adequate and economically competitive development land within its urban growth area in order to reduce rural development pressures on the valuable agricultural lands outside the City's SUDP and in the surrounding region.)* (Policy OS-2.2)

MERCED VISION 2015 GENERAL PLAN ENVIRONMENTAL IMPACT REPORT

The Merced Vision 2015 General Plan EIR specifically evaluated the adverse environmental impacts that would result if agricultural land at the project site were converted to urban uses. The General Plan Program EIR states that implementation of the existing City General Plan could have a significant adverse impact on the environment if it substantially reduces agricultural production capacity of the region or results in the substantial loss of prime agricultural soil production capability. Specifically, for purposes of the General Plan Program EIR, an impact is considered significant if the City General Plan would:

- convert economically viable concentrations of prime agricultural land to nonagricultural use,
- impair the agricultural productivity of prime agricultural land in the region, or
- conflict with adopted agricultural resource plans and goals of the City of Merced.

Chapter 7 of the General Plan Program EIR, "Significant Unavoidable Effects Which Cannot Be Avoided If the Project Is Implemented," cites a significant and unavoidable impact related to loss of Agricultural Soils. Population growth in Merced County, and the San Joaquin Valley, will create pressure to convert "prime" and other productive agricultural soils to urban uses. Due to the historical location of the Valley's urban centers, any growth or population expansion can be expected to affect productive agricultural land.

The EIR for the *Merced Vision 2015 General Plan* states that the plan reduces the potential adverse effects of regional growth by providing a compact urban setting where growth and development can occur, thus reducing the amount of agricultural land that is consumed by the urbanization process. The EIR also states the General Plan designates growth areas that exhibit characteristics associated with less productive agricultural lands. The General Plan EIR acknowledges the loss of farmland as a result of urban development with the SUDP, as indicated in the following statement.

> The implementation of the ***Merced Vision 2015 General Plan*** will result in the loss of approximately 7,286 acres of crop land with a productive capability projected to be approximately $4.1 million. The total 1995 economic impact of the loss productive capability is estimated to be $15 million (1995 dollars) or roughly 0.66% of the economic agriculturally-related activity of Merced County. At the same time, the

urban expansion of the Merced city limits, through various policy provisions, impacts agricultural lands outside the urban development area of the City. As a final consideration, development of support activities and services are essential to the long-term viability of the agricultural productive capacity of the region. Industrial, residential and service area needs must be met through the provision of urban land uses with adequate infrastructure, such as will occur in the City of Merced. Compact urban development, as concluded by a report prepared by the American Farmland Trust, (Alternatives for Future Urban Growth in California's Central Valley) results in less agricultural land conversion than low density "sprawl" type of development.

On the basis of this analysis, it has been determined that the conversion of "prime" agricultural soils non-productive agricultural uses is a "significant" adverse impact under CEQA. In order to achieve the goals of maintaining a compact urban form, and other types of land-use compatibility issues, mitigation which would eliminate this loss is not possible.

While these areas designated for urban growth include some "prime" and other important soils, the conversion of these areas to urban uses minimizes impacts to agricultural resources when compared to alternative growth and development scenarios in the region. The main reason for this conclusion is that a more condensed urban development plan that results in (or allows) the conversion of some agricultural land is better than a plan that does not contain development and allows for leapfrog developments into unplanned and undeveloped areas, which would thereby result in a higher conversion of agricultural lands. Nonetheless, the loss of any "prime" agricultural soil resource is, however, a significant and unavoidable adverse impact on the environment. In particular, the General Plan Program EIR found that the urbanization of the project site would result in a significant and unavoidable impact to agricultural resources, but that impact would be less extensive than impacts to agricultural resources that result under alternative growth scenarios.

COUNTY AGRICULTURAL POLICIES

Despite the extensive growth of the City of Merced and other cities in Merced County in the last several decades, Merced County still has thousands of acres of agricultural land. Merced County has designated property east of the site for agriculture (see Exhibit 3-5). The Merced County General Plan Agricultural Element provides extensive background on the character and importance of agriculture as an economic activity and agricultural lands as a resource, as well as a strong policy base for protecting agriculture and agricultural resources.

Although the proposed project is fully within the Merced city limits, it borders existing agricultural land in unincorporated Merced County. There is no right-to-farm ordinance in unincorporated Merced County applying extra protections to agricultural operations from nuisance complaints and other potential hindrances of agricultural activity that can result from urban development occurring in or near agricultural areas.

According to the Merced County Zoning Code, the agricultural zones were established for the purposes discussed in the code section below. The purposes given for each zone also illustrate the difference in minimum acreage among the three agricultural zones (Merced County Zoning Code, Section 18.02.010).

A. The purpose of this chapter is to achieve the following:

1. Provide a suitable environment for the preservation, development, and growth of agriculture.

2. Protect the agricultural industrial community and its related uses from encroachments of non-related or incompatible uses.

3. Preserve and encourage the economic stability of agriculture.

4. Ensure compatibility of adjacent land uses with agricultural zones.

B. The purpose of each agricultural zone is to achieve the following:

1. General Agricultural (A-1) Zone. The purpose of the general agricultural zone (A-1) is to provide for areas for more intensive farming operations dependent on higher quality soils, water availability and relatively flat topography, and agricultural commercial and/or industrial uses dependent on proximity to urban areas or location in sparsely populated low traffic areas. Parcels smaller than forty (40) acres down to a minimum of twenty (20) acres can be considered where agricultural productivity of the property will not be reduced.

2. General Agricultural (A-1-40) Zone. The purpose of the general agricultural zone (A-1-40) is to provide areas where the forty (40) acre minimum parcel size of the zone allows for the widest variety of farming operations including agricultural commercial/industrial uses which are dependent on medium to higher quality soils, water availability and larger parcel sizes away from urban areas.

3. Exclusive Agricultural (A-2) Zone. The purpose of the exclusive agricultural zone (A-2) is to allow for considerably expanded agricultural enterprises, due mainly to the requirement of larger size land parcels which are more economically suitable to support farming activities occurring in the area. The one hundred sixty (160) acre minimum parcel size of the zone allows for farming and ranching operations and a variety of open space functions that are typically less dependent on soil quality and water for irrigation and are often connected more with foothill and wetlands locations, grazing and pasture land and wildlife habitat and recreational areas. (Ord. 1586 [part], 1977).

The land bordering the project site to the east in the unincorporated Merced County is zoned General Agricultural (A-1).

4.1.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, an agricultural resources impact is considered significant if implementation of the proposed project would do any of the following:

- convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use;
- conflict with existing zoning for agricultural use, or a Williamson Act contract;
- involve other changes in the existing environment that, because of their location or nature, could result in conversion of Farmland, to nonagricultural use; or
- is inconsistent with City General Plan goals and policies relevant to protection of agriculture.

IMPACT ANALYSIS

IMPACT 4.1-1 Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. *The proposed project would result in the conversion of Prime Farmland. The project would result in a* ***significant*** *impact.*

As previously described, a large area of Prime Farmland is located in southeast Merced (where the project is located). Of the Prime soil areas in southeast Merced, the General Plan designates nearly all for industrial development (see Exhibits 4.1-1 and 4.1-2). Conversion of Prime soils to nonagricultural production uses is

considered a significant adverse impact under CEQA. The General Plan EIR further states that future industrial, residential, and service area needs must be met through the provision of urban land uses with adequate infrastructure. Compact urban development, as concluded by a report prepared by the American Farmland Trust (Alternatives for Future Urban Growth in California's Central Valley), results in less agricultural land conversion than low-density "sprawl" type of development. The General Plan EIR concludes that to achieve the goals of maintaining a compact urban form, and other types of land-use compatibility issues, mitigation that would eliminate this loss is not possible.

EVALUATING FARMLAND CONVERSION IMPACTS

Impacts related to direct conversion of farmland have been quantified according to several criteria using the California Land Evaluation and Site Assessment model, as described below. Using methodology recommended by DOC, the LESA model is used to assess the significance of agricultural land conversion resulting from implementation of the proposed project. In Section IV of the LESA Instructional Manual, the significance of project impacts is characterized in the following manner.

The LESA model is used by many lead agencies to assess agricultural land conversions quantitatively in the environmental review process (Public Resources Code Section 21095), including in CEQA review. The LESA is a point-based approach for rating the relative importance of agricultural land resources. LESA considers soil quality, parcel size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, these criteria are rated, weighted, and combined, resulting in a single numeric score. The score associated with the agricultural resource becomes the basis for making a determination of a project's potential significance.

Using methodology recommended by DOC, the LESA model was used to assess the significance of agricultural land conversion resulting from implementation of the proposed project. In Section IV of the LESA Instructional Manual, the significance of a project's impacts is characterized in the following manner:

0–39 points	Not considered significant.
40–59 points	Considered significant **only** if LE (Land Evaluation) **and** SA (Site Assessment) are each **greater** than or equal to 20 points.
60–79 points	Considered significant **unless** either [the Land Evaluation] **or** [Site Assessment] subscore is **less** than 20 points.
80–100 points	Considered significant.

The LESA model was used to analyze the project site. As shown in Table 4.1-3, the project scored an 88.4 with subtotals of 43.4 and 45 for the land evaluation and site assessment portions, respectively.

Table 4.1-3
LESA Scoresheet for the Project Site

Factor Name	Factor Rating	Factor Weighting	Score
Land Evaluation			
Land Capability Classification	87.2	0.25	21.8
Storie Index Rating	86.5	0.25	21.6
Subtotal			43.4

Table 4.1-3
LESA Scoresheet for the Project Site

Factor Name	Factor Rating	Factor Weighting	Score
Site Assessment			
Project Size	100	0.15	15
Water Resource Availability	100	0.15	15
Surrounding Agricultural Lands	100	0.15	15
Protected Resource Lands	0	0.05	0
Subtotal			45.0
Total			**88.4**

Source: Calculated by EDAW using methods of the California Department of Conservation provided in *California Agricultural Land Evaluation and Site Assessment Model Instruction Manual* (1997).

The project scored an 88.4 with subtotals of 43.4 and 45 for the land evaluation and site assessment portions, respectively (please see Table 4.1-3 above or Appendix B for more information). Based on the scoring established by the state, this is considered significant. Furthermore, as shown on Table 4.1-2, the project would result in the conversion of approximately 228.68 acres of farmland, as defined by CEQA, which is also considered a significant impact.

Because of the project would result in the conversion of 228.68 acres of Farmland and the significant LESA score, the effect on Farmland soils is considered a significant impact. Furthermore, industrial uses adjacent to agricultural land can result in land use conflicts and create incentives for agricultural producers to discontinue agricultural operations and sell their land for development.

The proposed project would be within the Merced city limits on the fringe of existing development in the southeast portion of the City, with a large amount of the surrounding land uses in agriculture, but the area also includes adjacent industrial uses. The proposed project would be located in an area that is planned for future industrial development, according to the General Plan. The site is surrounded to the east, south, and west by other agricultural uses. To the north are two existing industrial businesses. Further to the northwest is the City of Merced, which is primarily urbanized.

As mentioned previously, placing industrial adjacent to agriculture can produce land use conflicts and can lead to increased conversion of agricultural land. Approximately 70% of the project site consists of Prime Farmland, the conversion of which would be considered a ***significant*** impact. The City's General Plan EIR further concludes that to achieve the goals of maintaining a compact urban form, and other types of land-use compatibility issues, mitigation that would eliminate the loss of agricultural land to urban development is not possible. Therefore, because no mitigation is available to reduce this impact, the impact would remain ***significant and unavoidable***. This conclusion is consistent with the conclusion of the EIR prepared for the Merced Vision 2015 General Plan. It should be noted that the City considered the significant impact associated with the conversion of farmland resulting from buildout of the General Plan and adopted a Statement of Overriding Considerations (Resolution No. 97-22).

IMPACT 4.1-2 Conflict with Existing Zoning for Agricultural Use, or a Williamson Act Contract. *The project site is neither zoned for agriculture nor is it in a Williamson Act contract; therefore, the proposed project would have no impact.*

The site is currently and has historically been used for agricultural purposes, and is located in an area in southern Merced where large amounts of agricultural properties exist. However, the project site is neither zoned for agriculture nor is it in a Williamson Act contract. The project site is located on incorporated land adjacent along the western boundary of unincorporated land currently under Williamson Act contract. However, the site is currently designated in the City General Plan as Industrial, is zoned Heavy Industrial District, and has adjacent industrial use to the north of the site. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract and would have **no impact**.

Mitigation Measure

No mitigation is required.

IMPACT 4.1-3 Other Changes in the Environment that Could Result in Conversion of Farmland to Nonagricultural Use. *The proposed project could foster future farmland conversions; however, the project conforms to the City's plans and designations. This impact would be considered less than significant.*

The project site is located in the City's planned buildout area and currently designated Industrial and zoned Heavy Industrial. The proposed project would be consistent with the City's zoning and land use policies and plans. However, the southeast area of Merced has historically been used for agricultural production, and existing agricultural practices are currently taking place on-site and in the immediate vicinity, and extending east, west, and south into surrounding Merced County territory.

Upon development of the site, surrounding agricultural operations that have long been adapted to being adjacent to an agricultural site, would be instead adjacent to an urban site. Urban and agricultural conflicts generally arise with the location of residential uses close to agricultural uses because of dust, noise, smell, and other by-products of agricultural production, and can lead to land use changes and conversion of agricultural land. However, industrial use, depending on the type, can be compatible with agricultural activities, if the industrial use is not sensitive to noise, dust, unfavorable smell, and other nuisances, and therefore can exist in proximity to one another without significant impacts.

The proposed 1.1-million-square-foot Wal-Mart distribution center requires a large amount of space because of extensive parking needs and building configuration; it requires separation from residential areas and sensitive receptors, and close proximity to arterial streets because truck traffic to and from the site would be constant, creating noise and increased traffic volume. The conversion of 228.68 acres of agricultural lands could eventually lead to conversion of nearby agricultural properties to urban use in the project vicinity. However, the proposed site is located within the City's planned build-out boundary. The impact is therefore ***less than significant***.

Mitigation Measure

No mitigation is required.

IMPACT 4.1-4 Potential for Inconsistency with Merced General Plan Goals and Policies Relevant to Protection of Agriculture. *The proposed project conforms to the City's planning documents and designations, making this impact less than significant.*

According to the *Merced Vision 2015 General Plan* EIR, roughly 94% of the land in Merced County is usable for agricultural purposes, whether that use is intense farm production or grazing land. The project site is located in the

southeast portion of Merced, with Merced County territory adjacent to the south and east. For the *Merced Vision 2015 General Plan*, the *City of Merced Commercial and Industrial Land Study (1994–2010)* was completed. This study attempted to identify future commercial and industrial sites to be included in the City General Plan. This action was necessary because the City's inventory of readily available commercial and industrial sites was low. As has been mentioned previously, the proposed project site is currently zoned Heavy Industrial in the City's zoning ordinance and has a land use designation of Industrial in the *Merced Vision 2015 General Plan*.

The City General Plan contains several sections that contain goals and policies relevant to the protection of agriculture, including Sustainable Development; Open Space, Conservation and Recreation; Urban Expansion; and Land Use. Goals related to agriculture protection found in these sections, and including the City General Plan EIR are summarized in Section 4.1.2, "Regulatory Setting." Most of the goals included in this section relate to the pursuit of economic development activities while minimizing the loss of agricultural cropland, establishing buffer areas along the urban interface with prime agricultural lands, and preserving agriculturally significant areas. The City General Plan promotes economic development activities in the City. As mentioned previously, the project is located in a planned buildout area, according to the City General Plan. Therefore, the proposed project would be consistent with the City's General Plan and related policies, and the project would have a ***less-than-significant*** impact.

Mitigation Measure

No mitigation is required.