IV.B AGRICULTURAL RESOURCES

1. Introduction

This section evaluates the impact of implementation of the proposed Grand Park Specific Plan on agricultural resources in the project area and the region. The analysis presented in this section is based on information contained in the City of Ontario The Ontario Plan (City TOP), relevant maps and reports provided by the Natural Resources Conservation Service (NRCS), and guidance provided by the California Department of Conservation's Land Evaluation and Site Assessment (LESA) Model, and correspondence received from the State Department of Conservation (refer to Appendix A-3). The LESA model calculations and associated maps are included in their entirety in Appendix B.

2. Environmental Setting

a) Existing Agricultural Conditions

1) Regional Conditions

According to the 2010 Crop and Livestock Report (San Bernardino County Department of Agriculture/Weights & Measures, 2010), the gross value of agricultural production in San Bernardino County for 2010 totaled $427,578,500 a decrease of $72,199,100 from the previous year.

Per the 2010 Crop Report for San Bernardino County, the commodity with the greatest percent decrease in total value from 2009 is red wine grapes, due to the price per ton. Additionally, desert rangeland has the lowest per acre value.

San Bernardino County's top ten commodities had a combined gross value of $384,109,400 (2010 Crop Report). The top ten agricultural products by gross value, including the percent of overall gross value, are as follows (in descending order by percentage of total):

- Milk (56.3 percent)
- Eggs (10.7 percent)
- Cattle and Calves (meat) (7 percent)
- Oranges (3.2 percent)
- Trees and Shrubs (2.7 percent)
- Replacement Heifers (2.5 percent)
- Alfalfa (all) (2.4 percent)

- Bok Choy (2.3 percent)
- Indoor Decoratives (1.6 percent)
- Ground Cover (1.1 percent)

The 2010 report identified San Bernardino County as having a total of 1,403,870 acres involved in agricultural activities. The breakdown of land dedicated to each of the various agricultural commodity groups is provided in Table IV.B-1. However, given the nature of dairy and livestock operations, acreages are not relevant to total production of that commodity group, and therefore no acreage is provided.

Table IV.B-1: San Bernardino County Agricultural Land Summary

Commodity Group	2010 Acreage	2010 Dollar Value
Field Crops	1,393,669	$17,199,150
Vegetable Crops	4,689	$ 23,383,300
Fruit & Nut Crops	4,458	$21,645,850
Livestock & Poultry	N/A	$ 336,659,900
Nursery Products	1,063	$ 28,659,900
TOTAL	1,403,870	$427,578,500

The 2010 Crop and Livestock Report identified an estimated total of 90 dairies as of January 1, 2010, and 90 dairies as of January 1, 2011. The estimated value of the dairy products (milk) within the Chino Basin is approximately $240 million for 2010. The total economic value from the livestock and livestock products in 2009 was approximately $267 million and in 2010 was approximately $336 million.

Field crops increased in acres harvested from 983,910 acres in 2009 to 11,393,699 acres in 2010. Fruit and nut crops increased in acres harvested from 3,799 acres in 2009 to 4,458, acres in 2010. Vegetable crops decreased in acres harvested from 4,836 acres in 2009 to 4,689 acres in 2010. Nursery products increased in field acres from 966 acres in 2009 to 1,063 acres in 2010. As previously indicated, livestock and poultry are not reported in acres harvested.

Per the Draft EIR for TOP, with the adoption of the NMC General Plan Amendment in 1999, most of the agricultural land in the NMC has been designated as residential, commercial, industrial, open space, or public land. There are four sections of agricultural preserve in the NMC Land Use Plan, totaling 200 acres in the southwestern portion of the City. The change of land use from agricultural to nonagricultural has mostly been due to increasing population, which has put pressure on cities in southern California to turn Important Farmland into uses that would support residential, economic, and employment needs. Dairies and farms in

Ontario have also found that they are being out-competed by dairies and farms in the Central Valley, so they have either converted their land to more productive, nonagricultural uses or they have left Ontario for the Central Valley. Certain programs, which are discussed below, have been implemented in the area to preserve agricultural land in areas where it is being phased out.

2) NMC Agricultural Conditions

The project site is part of the 8,200-acre Ontario Sphere of Influence area annexed into the City of Ontario (City) on November 30, 1999, known today as the New Model Colony (NMC). The Ontario NMC area is located in the central portion of the Chino Basin within the former San Bernardino County Agricultural Preserve. TOP Draft EIR states that between 2004 and 2006, San Bernardino County lost 3,755 acres of Important Farmland (34,675 acres to 30,920 acres). The total amount of Important Farmland in the City is 3,269.3 acres, 10.2 percent of the total land in Ontario (31,957.9 total acres). Ontario has 3,005.8 acres of Prime Farmland, 164.2 acres of Farmland of Statewide Importance, and 99.3 acres of Unique Farmland, and 5,947.4 acres of other lands.

Dairy operations in the Chino Basin area began more than 40 years ago. At its peak, the Chino Basin contained the highest density of dairy animals found anywhere in the world. According to the California Department of Food and Agriculture, there were approximately 354 dairies operating in the Chino Basin in 1989. As of 2010, about 90 dairies operated in the County of San Bernardino.

Agricultural land use in the Chino Basin has faced increasingly intense development pressure as the population of the Inland Empire has rapidly increased. In 2004, San Bernardino County's population was projected to increase from 1.9 million in 2000 to almost 3 million by the year 2030. In 1998, the City adopted the NMC General Plan Amendment for the portion of the City known at that time as the Sphere of Influence (SOI). This amendment established a comprehensive development strategy for the future development of the SOI that included 30 sub-planning areas known as subareas. Following this, the City adopted TOP in 2010 that serves as the general plan for the entire City including the NMC. Within the NMC is the proposed Specific Plan area, which includes approximately 320 acres of active dairies and agricultural land.

Based on review of historical aerial photographs, it appears that agricultural activities dominated by crop production have occurred on the project site since the 1940s (Phase I reports for the Van Meeteren, Aspen/Martin, Bosma, and Schone-Tevelde Properties). However, by the 1970s, the majority of these properties had been converted to active dairies.

TOP plans for the conversion of virtually all of the active agricultural land in the NMC, with the only future agricultural land consisting of the 200-acre Southern California Land Foundation (SoCALF) Preserve, owned by the County of San Bernardino. Approximately 200 acres are designated as SoCALF Preserves in the NMC. Approximately 200 acres are designated as SoCALF Preserves in the NMC.

Regardless, the City recognizes the importance of existing agricultural activities, and TOP includes Goal ER5 in the Policy Plan (for Biological, Agricultural, and Mineral Resources) for protection high value habitat and farming and mineral resource extraction activities that are compatible with adjacent development. Additionally, Policy ER5-3 states: "Right to Farm. We support the right of existing farms to continue their operations within the New Model Colony." When the NMC was annexed in 1999, the City zoned the area as Specific Plan, which requires the area to be developed with specific plans. Once a specific plan is implemented in an area, the provisions of that plan will determine the land use, which will be consistent with the general plan. However, the development of this area will be a gradual process and agricultural uses will exist on an interim basis before the land is developed. In January 2001, the City adopted the Agricultural Overlay Zone, or the Right to Farm ordinance, to act as a "buffering" device between existing agricultural uses and urban development.

Many of the properties within the NMC have been subject to Williamson Act Contracts, a tool utilized by the state to provide the agricultural landowner with property tax breaks while also assisting in the long-term preservation of agricultural land. The Williamson Act is discussed in greater detail below.

3) Project Site Agricultural Conditions

The project site is currently being utilized for agricultural operations and dairies. Approximately 77 acres (the Lee property) are engaged in agricultural production (of which approximately 60 acres is Prime Farmland), while approximately 40 acres (the Bosma property) are devoted to dairy operations, and the 20-acre portion at the southeast corner of the site is currently owned by the City and is currently being used as a rock crushing plant. The western portion of the property, located adjacent to Archibald Avenue, is also being used for agricultural operations.

b) Applicable Policies and Regulations

The City's Agricultural Overlay Zoning District, Section 9-1.2700 of the Ontario Municipal Code, allows for the continuation of agricultural uses on an interim basis until development is proposed for individual NMC subareas.

1) Williamson Act Contracts

The California Land Conservation Act (Williamson Act) was passed in 1965 to protect specific parcels of land in agricultural and open space use. Landowners enter into ten-year contracts with local governments and in return receive lower property tax assessments. The County's Williamson Act program provides an implementing tool for the General Plan Biological, Agricultural, and Mineral Resources Element.

Administration of the program involves two sets of records, one being the contracts between the property owner and the County, and the other being a series of agricultural preserve maps establishing the boundaries of lands under contract. The City administers this program for the County. With the annexation of the NMC in 1999, the City assumed responsibility for

administering land conservation contracts on those properties. Contracts are valid for an initial period of ten years and automatically renew each year to maintain a ten-year life. The property owner or the local planning jurisdiction may initiate a notice of non-renewal, stopping the automatic annual renewals and placing the contract in a status in which it completes its remaining ten-year life. Alternatively, a property owner may cancel a contract, subject to an approval process and penalties, to provide an immediate end to the contract. The Williamson Act specifies that contracts under the Act may only be cancelled if that cancellation is consistent with purposes of the Act and if the cancellation is in the public interest. To approve cancellation, the City Council must find that the cancellation is either: (1) consistent with the purposes of the Williamson Act, or (2) in the public interest. (Gov. Code, Section 51282, subd. (a).) To support a finding that the cancellation is consistent with the purposes of the Act, the City Council must make the following findings (CA Codes, 2012):

- (b)(1) That the cancellation is for land on which a notice of non-renewal has been served pursuant to Section 51245,
- (b)(2) That cancellation is not likely to result in the removal of adjacent lands from agricultural use.
- (b)(3) That cancellation is for an alternative use which is consistent with the applicable provisions of the city or county general plan.
- (b)(4) That cancellation will not result in non-contiguous patterns of urban development, and
- (b)(5) That there is no proximate non-contracted land which is both available and suitable for the use that is proposed for the contracted land, or, that development of the contracted land would provide more contiguous patterns of urban development than development of proximate non-contracted land. (Gov. Code, Section 51282, subd. (b).)

To support a finding that the cancellation is in the public interest, the City Council must find:

- (c)(1) that other public concerns substantially outweigh the objectives of this chapter and
- (c)(2) that there is no proximate non-contracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or that development of the contracted land would provide more contiguous patterns of urban development than development of proximate non-contracted land. (Gov. Code, Section 51282, subd. (c).)

According to the City, the 160-acre western half of the project site is currently enrolled in active Williamson Contracts. Within the eastern 160 acres of the site, the two 20-acre parcels at the southeast corner of the site have filed Notices of Non-Renewal and the contracts will expire in 2013, while the remaining 120 acres are not enrolled in any Williamson Act contracts. Correspondence received from the Department of Conservation

indicates that only one of these parcels has filed a notice of non-renewal. Refer to Figure II-4 in the Project Description section.

c) State Farmland Mapping Program

The California Department of Conservation (CDC) established the Farmland Mapping and Monitoring Program (FMMP) in 1982. The FMMP is a non-regulatory program and provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status and identified by the following categories, collectively referred to as Farmland: Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance.

3. Analysis of Project Impacts

a) Methodology

The evaluation of impacts to agricultural resources and operations is based on the amount and quality of agricultural land on-site and in the surrounding area, the effect the proposed project would have on such resources and operations, and the project's conflicts, if any, with rules, regulations, or contracts affecting agricultural land. As such, impacts are assessed based on the significance criteria provided below, relative to the existing regulations relating to agriculture in the area, and utilizing a quantitative model for evaluating the agricultural value of land.

b) Significance Thresholds

According to Appendix G of the State CEQA Guidelines, a project would normally have a significant effect on the environment if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- 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 land or conversion of forest land to non-forest use?
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The Initial Study concluded that impacts related to conflicts with forest land or timberland zoning and loss of forest land or conversion of forest land to non-forest use were less than significant. Refer to Appendix A-2 for a discussion related to these thresholds.

c) Analysis of Project Impacts

The proposed project would convert the existing agricultural land and agricultural uses located on the project site to non-agricultural uses. This would result in the conversion of 91.01 acres of land that is designated as Prime Farmland, which is considered a significant impact on Farmland and agricultural resources. Following is a discussion of the project impacts based on the LESA Model.

1) Conversion of Farmland to Non-Agricultural Uses

The LESA Model is composed of six different factors, which evaluate the land and the project site. Two Land Evaluation factors are based upon measures of soil resource quality. Four Site Assessment factors provide measures of a project site's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands intended to measure social, economic, and geographic attributes that contribute to the overall value of agricultural land. The factors used in the Land Evaluation and Site Assessment are as follows:

Land Evaluation

- Land Capability Classification; and
- Storie Index.

Site Assessment

The following are the four factors in the LESA model that are used as site assessment scoring criteria:

- Project Size Rating;
- Water Resources Availability Rating;
- Surrounding Agricultural Land Rating; and
- Surrounding Protected Resource Land Rating.

For a proposed project, each of these factors is separately rated on a 100-point scale. A single LESA score is generated for a given project after all of the individual Land Evaluation Factors and Site Assessment factors have been scored and weighted. The factors are then weighted relative to one another and combined, resulting in a single numeric score for a given project, with a maximum attainable score of 100 points. It is this project score that becomes the basis for making a determination of a project's potential significance, based upon a range of established scoring thresholds. According to the LESA Model, a project

would result in a significant impact on agricultural resources if it meets the criteria specified in Table 9 of the LESA Manual. Table IV.B-2 provides the ratings that determine if a project will result in a significant impact to Farmland.

Table IV.B-2: LESA Significance Ratings

Total LESA Score	Scoring Decision
0 to 39 points	Not considered significant
40 to 59 points	Considered significant only if LE and SA sub-scores are each greater than or equal to 20 points
60 to 79 points	Considered significant unless either LE or SA sub-scores are each less than 20 points
80 to 100 points	Considered Significant
Source: California Land Evaluation and Site Assessment Model (LESA), Table 9, California Department of Conservation, 1997.	

An overview of the six different factors and the worksheets for the proposed project are contained in Appendix B. Therefore, based on the evaluation in the LESA worksheets, the final score for the proposed project is 65.8 points out of a possible 100 points. Neither of the scores associated with the Land Evaluation factors or the Site Assessment factors were below the referenced threshold of 39 points. Therefore, implementation of the proposed project would have a significant impact on Farmland and agricultural resources.

2) Conflicts with Agricultural Zoning or Williamson Act Contracts

When the city annexed all of the land within the NMC, it was zoned as Specific Plan, which includes the project site. However, concurrently, the City adopted the Agricultural Overlay Zoning District (Article 27 of Title 9 of the Ontario Municipal Code), or a "right-to-farm" ordinance, that would allow existing agricultural uses within the NMC to continue until such time as specific development proposals were submitted. The continued operation of the on-site dairies and row crops is consistent with this ordinance, until such time as any of the residential, educational, or recreational components begin construction.

Since the adoption of the TOP, notices of non-renewal have been filed by property owners of a large portion of the agricultural preserve property within the NMC, including some of the parcels on-site. The filing of non-renewal notices by the property owners is reflective of the lack of a long-term commitment to agricultural uses in this area. The western half of the project site is currently enrolled in active Williamson Contracts, with contract expiration for approximately 70 of those acres to occur in 2017. Within the eastern portion of the site, the two approximately 20-acre parcels at the southeast corner of the site have contracts that expire in 2013 with a petition for cancellation. The remaining acres are not enrolled in any Williamson Act contracts. The cancellation of existing on-site Williamson Act contracts and subsequent removal of agricultural operations on-site is considered a significant impact.

Additionally, the project site and some of the area surrounding the project site support active agricultural operations. According to TOP EIR, in 2006, approximately 7,330 acres (89 percent) of the NMC were used for agriculture.

Potential conflicts between new development and existing agricultural land uses occur when the new development, by its nature, precludes or interferes with the continued agricultural use of adjacent or nearby land. The Specific Plan will be required to comply with the "right-to-farm" ordinance discussed above, which was established to protect agricultural land uses from conflict with non-agricultural land uses. This includes an appropriate buffer being maintained as long as any of the surrounding dairies are in operation. The project proposes a mix of low, medium, and high density residential land uses along with pocket parks, an elementary school site, a high school site, and the Ontario Grand Park. These uses would generally have a low potential to conflict with the continued agricultural use of adjacent properties as long as compliance with the Agricultural Overlay District standards is maintained. Therefore, no significant impacts due to conflicts between land uses are expected.

3) Changes in the Existing Environment

Per the Draft EIR for TOP, the conversion of agricultural lands to nonagricultural uses was analyzed in the EIR prepared for the New Model Colony General Plan Amendment (NMC EIR). Impacts to agricultural lands as a result of such conversion was found to be a significant and unavoidable impact for which the City Council adopted a Statement of Overriding Considerations. Likewise, the implementation of the Proposed Land Use Plan of TOP would potentially convert all 3,269.3 acres of the City's Important Farmland to non-farmland uses, including residential, commercial, mixed-use, public, open space, and industrial. The proposed land use plan designates four noncontiguous parcels of land (totaling approximately 200 acres) as SoCALF Preserves.

The properties surrounding the project area are currently utilized for agricultural operations. However, the properties to the north, west, and south will be developed with urban uses per approved specific plans, including The Avenue Specific Plan, the Parkside Specific Plan, and the Subarea 29 Specific Plan, respectively, consistent with TOP. Because the land within the project area is located within an area of the NMC planned for urban development, and the surrounding agricultural properties will be developed with urban uses per approved and proposed Specific Plans, the City's adoption and implementation of the NMC anticipates the conversion of the project site from agricultural uses to urban uses. Therefore, implementation of the proposed Specific Plan would not result in the conversion of Farmland beyond what was previously identified in TOP EIR. Therefore, project-level impacts related to the conversion of Farmland from other changes in the environment would also be significant.

4. Cumulative Impacts

Future planned urban development in the City is anticipated to result in the conversion of agricultural uses to non-agricultural uses that would substantially reduce overall agricultural productivity in the region. Implementation of the Grand Park Specific Plan would result in a cumulative impact relative to the reduction of agricultural productivity within the region.

The productivity of other types of agriculture such as cultivated crops, grazing, and poultry on prime and non-prime agricultural lands would also be lost. In addition to the NMC, future planned urban development in the City of Chino and in Riverside County is also anticipated to result in the conversion of agricultural lands to urban uses, which would substantially reduce agricultural productivity.

This conversion corresponds with the projected decline in long-term agricultural productivity on the project site and within the NMC. According to TOP EIR, the only prime agricultural land in the NMC that will not be converted to non-agricultural use is the Southern California Agricultural Land Foundation (SoCALF) properties, which total approximately 200 acres. The project site is not one of the SoCALF properties.

5. Mitigation Measures

TOP did not include any mitigation measures for the conversion of prime agricultural land to non-agricultural uses or include any mitigation measures that would avoid the impacts related to agricultural productivity for individual projects. TOP EIR states that: "no feasible mitigation measures are available to prevent or reduce the agricultural impacts caused by implementation of TOP."

As previously discussed, the City's Agricultural Overlay Zoning District would allow for continuation of similar agricultural uses (dairy and row crops) on portions of the property not immediately planned for development. However, continued agricultural production on the project site would be considered an interim use and would not provide mitigation for the expected conversion of agricultural land and agricultural uses on the project site or for the regional conversion of agricultural lands. Therefore, interim retention of existing on-site agricultural uses would not be a feasible on-site mitigation measure for the ultimate conversion of the entire site from agricultural land uses to urban land uses.

The potential to provide on-site mitigation for the loss of prime agricultural land and the existing agricultural uses was considered, but rejected as infeasible for several reasons. First, because approximately 29 percent (91.01 acres) of the project site is considered Prime Farmland, which is not evenly distributed across the project site, and because the project site is used for agricultural production, the only feasible on-site mitigation would be avoidance (i.e., to not implement the proposed project). However, this is infeasible because of the inconsistency with TOP designations for the project site and the effect this could have on the overall implementation of TOP. Second, retaining a portion of the project site for similar agricultural uses to those that currently exist on the project site would also be infeasible.

Besides conflicting with the planned land uses designated for the site in TOP, the continuation of crop and dairy operations in proximity to future residential, educational, and recreational uses would negatively affect such uses and would create a nuisance for people living, working, and recreating in the area. Additionally, per TOP EIR, the change of land use from agricultural to nonagricultural has mostly been due to increasing population, which has put pressure on cities in southern California to turn Important Farmland into uses that would support residential, economic, and employment needs. Dairies and farms in Ontario have also found that they are being out-competed by dairies and farms in the Central Valley, so they have either converted their land to more productive, nonagricultural uses or they have left Ontario for the Central Valley. If a portion of the site was maintained in agriculture, in the long-term it would become economically unviable, as the other dairies and agricultural uses within the Chino Basin continue to move out to other regions and states. Agriculture needs specialized support uses such as feed stores, equipment sales and maintenance, and manure removal services; without a critical mass of customers (dairies and farms), such services close, thus driving the cost of securing such services up and making agriculture less profitable. In particular, agricultural uses on small acreages, such as portions of the project site, would likely be, or quickly become, not economically viable. Market forces also contribute to the acceleration of urbanization in the NMC and associated decline in economic viability of agricultural production in the area. Therefore, not implementing the project or permanently retaining a portion of the project site for agricultural uses are not feasible on-site mitigation measures.

The potential to provide off-site mitigation for the loss of agricultural land and agricultural uses were considered, but rejected as infeasible. Using one of the other NMC planning subareas as mitigation for impacts related to the project site would result in virtually the same issues as previously described in consideration of on-site mitigation. Therefore, similar to the reasons why on-site mitigation is not feasible, off-site mitigation within the NMC is also infeasible. In addition, off-site mitigation within the region is also considered infeasible due to the decreasing economic vitality of agriculture in the NMC and Southern California and increased urbanization pressures on existing agricultural lands.

The City has considered but rejected the collection of fees for off-site mitigation of agricultural impacts. The Department of Conservation has commented on other EIRs suggesting fees to fund off-site mitigation for agricultural impacts. However, an off-site fee mitigation program would not avoid the loss of farmland, would not minimize the scope of the project, would not repair, rehabilitate or restore the affected farmland, and would not replace affected farmland with substitute farmland. Thus, such a program would not actually mitigate the significant impact of the project (CEQA Guidelines, § 15370). Moreover, such a program is infeasible. The same factors that make on-site mitigation infeasible would apply off-site as well, because the challenges to continued agricultural production in the Chino Basin also challenge agriculture throughout Southern California. (*Defend the Bay v. City of Irvine* [20204] 119 Cal. App. 4th 1261, 1270-72) At least one study has found that environmental and economic factors may result in greater conversions than urban development (e.g., Kuminoff 2001).

This option would require the City to purchase replacement acreage for Important Farmland currently not in use elsewhere in California and restore it as viable farmland. This type of mitigation would face the same drawbacks as outlined above, unless the mitigation parcels were in another portion of the state. However, in such circumstances that type of distant mitigation would not reduce impacts because these mitigation parcels could have no bearing or relationship on the loss of agricultural lands within the City. Furthermore, replacing Important Farmland areas outside the City also would have its own environmental impacts such as potential impacts to biological resources, groundwater quality, and air quality as a result of converting vacant land to agricultural uses. Furthermore, this mitigation strategy would cause no net change in Important Farmland conversion within the state because new Important Farmland cannot be created. Consequently, for the reasons outlined above and in this paragraph, it is determined that off-site mitigation of agricultural resources is neither feasible nor effective in mitigating such impacts.

The entire NMC area, with the exception of the SOCALF properties, is planned for urban development pursuant to TOP. Therefore, retention of agricultural lands within the NMC would be contrary to the planned uses in the area, and would also generate land use conflicts with adjacent urban development, as would be the case for the project site. The retention of the SOCALF properties would not represent a feasible mitigation measure.

Therefore, no feasible on-site or off-site mitigation measures exist.

6. Level of Significance After Mitigation

Implementation of the proposed project would accelerate the conversion of agricultural lands and agricultural uses within the NMC and in the region. The loss of agricultural lands is considered significant on the project site and also considered cumulatively considerable from a regional perspective.