

## Section 2.1, Scoping Comments on Agriculture



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### 1) BACKGROUND

Calaveras is blessed with over 212,000 acres of agricultural land. It is no surprise that over the last few years Calaveras County agriculture has produced 25 to 30 million dollars in sales annually, primarily from livestock, fruits and nuts, field crops, and timber. (Attached, Calaveras County, 2015 Crop Report.)

While we commonly refer to these lands as agricultural lands, they actually provide a great variety of benefits to our community, in addition to their annual production of agricultural products.

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### A) Other Values Provided by Ag. Land

Ag. lands are a net fiscal benefit to local governments. Numerous studies show Ag. lands are a net fiscal benefit relative to developed uses, that tend to consume more government revenues than they produce.

Ag. lands help us meet our responsibility to be good stewards of many natural resources through groundwater recharge, storm water filtration and retention, providing fish and game habitat, maintaining endangered species habitat, preserving oak woodlands, carbon sequestration, soil conservation, air pollution reduction, establishing fire breaks, and sharing scenic beauty.

Our Ag. lands help us to carry on the areas rich history and traditions. Many local families want to carry on the agricultural tradition of their ancestors, some of whom date back to the days of the Gold Rush.

Our Ag. lands provide an important reserve of food and fiber production that supports our national security. So long as an army “marches on its stomach,” wears leather, and builds things out of wood, the food and fiber produced on the Ag. lands of Calaveras County will be one of our major local contributions to national security.

Maintaining our Ag. lands preserves land use options for the future. As we pave over farmland, we take the option of farming it away from the next generation, who may value that farmland even more than we do. Their interests are not represented in the current economic competition for the land.

Our Ag. lands are an important component of the character development of our youth. Ag. land not only produces good food and fiber, the families who work it produce good people. We owe it to future generation to ensure that they will be as blessed as we are, by the fine community leaders and public servants that are raised on Ag. lands.

### B) Many Acres of Farmland are Converted to Development Every Year

Because Ag. lands are such a large and valuable component of the county land base, and because they are threatened by conversion to other uses, an adequate general plan would include proven methods to protect agricultural lands so that those lands will continue to produce a stream of both economic and non-pecuniary benefits long into the future. Unfortunately, to date Calaveras has been losing farmland to other uses at an alarming rate. According to the USDA, between 2004 and 2012, farm acreage dropped by over 50,000 acres. (Attached, Calaveras County, Crop Report 2004; Crop Report 2012.)

In response to the conversion of Ag. land to other uses, a number of concerned citizens drafted an Agricultural Element for the General Plan Update. (Attached, 2008 Draft Agriculture Element.) After reviewing the draft element, members of the community raised a number of concerns. As a result, the mitigation measure and

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implementation details that would have reduced the impact of agricultural land conversion were removed from the General Plan Update project description.

As the general plan update progressed in 2010, consultants developed conceptual alternative maps for review and consideration by the Board of Supervisors. The UPLAN model was then used predict development of these mapped lands over a 30 year period. Under Alternative A, the model estimated that over 48,000 acres of Agricultural land and Residential-Ag. lands would have developed for housing. Under Alternatives B and C, the model estimated that over 29,000 acres would have been developed for housing. (Calaveras County, General Plan Update Alternatives Report, 2010, p. 55.)

In 2014, individual landowners sent in requests to have their land given a designation different than that on the proposed land use designation map. A number of these requests were to allow increased development densities on Ag. land properties. A total of over 18,000 acres in such new designations were proposed, and about 5,000 acres were approved by the Planning Commission.

### **C) Ag. Land Conservation raises concerns that can be addressed.**

As noted below, the community concerns regarding the potential adverse effects of the proposed Ag. Element can and must be addressed so that the County can move forward with a feasible and effective set of Ag. land conservation strategies. Such feasible mitigation approaches cannot be rejected based upon bias and misinformation.

- 1) One comment raised during the Planning Commission review of the Draft General Plan was that the conservation of agricultural lands is not an appropriate activity for county government. Actually, the general plan law that empowers the County to approve land use development also makes the County responsible for preserving open space lands, including agricultural lands, whenever feasible. Similarly, although CEQA empowers the County to approve development projects with significant impacts, it also makes the County responsible for mitigating those impacts whenever feasible. The courts have held that requiring the purchase of conservation easements to offset the impacts of developing agricultural lands is an acceptable type of impact mitigation for local governments to employ. As much as they may wish this were not so, neither the Planning Commission nor the Board of Supervisors has the authority under the law to cherry pick their powers and ignore their responsibilities. If people want to make their arguments against agricultural land conservation in Sacramento to get the state to change the law, that is their right. However, the County has must comply with the existing law as it prepares its general plan.
- 2) Another concern expressed during the Planning Commission review was that permanent conservation easements may tie up land that is later unsuitable for agriculture, or more appropriately developed in the future. First, it is worth noting

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that in other instances, conservation easements have been moved to other properties upon agreement of the parties granting and holding the easement. This could also happen with agricultural easements. Second, the County typically confers in perpetuity the right to develop agricultural land for residential and commercial uses. There is no guarantee that the owners holding those rights will relinquish them when the developed use is past its prime. There is no requirement that owners return those lands to agricultural production. Thus, conservation easements pose no more serious threat to the future efficient use of land than other land use entitlements. Finally, as expressed by the state laws seeking to conserve agricultural lands, the people of California recognize that while there is ample space to convert to developed uses, there is a limited amount of productive agricultural land. As a result, the State of California and the counties within it are tasked with the effort to conserve these lands for future generations.

- 3) One concern is that the loss of property value if the Ag. land cannot be developed. One adverse effect of this loss in value is that it limits the ability of the owner to get loans from the bank to invest in continued agriculture on the property. This objection can be addressed by employing Ag. land conservation strategies that maintain the value of the agricultural land. For example, an Ag. land easement and/or County policy could allow an owner to cluster available development density onto a small percentage of the Ag. land, while maintaining the remainder permanently in agriculture. Thus, the owner retains the potential for valuable development that the banks look for when evaluating loans. Another approach is to encourage and seek funding for long-term conservation leases that could protect the agricultural, scenic and natural values of the land for 50 years while providing a reliable revenue stream to landowners for managing their land just as they do today.
  
- 4) Another concern is that Ag. land mitigation requirements would lower the value of Ag. land for conversion to developed uses, since the mitigation is costly. This depends on the type of mitigation proposed. In the example provided above, there is no need to reduce the value of the land to mitigate the conversion impacts.

Of course, there are other mitigation strategies that require a developer to purchase conservation easements on other Ag. lands before developing his own. While it is true that such a strategy would lower the value of the land to be developed, it also has the affect of *improving* the economic viability of the remaining Ag. lands. Thus, there is no net loss, merely a transfer in value and the creation of a mitigation market that can be highly profitable to those who wish to stay in agriculture. As noted above, Ag. lands provide a great deal of the scenic beauty and rural setting that is a key attractant of people to this area, and a key component of the area's real estate value. This benefit is currently not being

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compensated in the market. Thus, this mitigation is merely providing a market mechanism to cure a market flaw, and improve its efficiency.

- 5) Another concern was that Ag. land conservation strategies could result in a loss of property rights. At this time, there are no rights to intensively develop agriculturally designated land on the County's land use map. Such intense development requires changes in the general plan and zoning that are at the discretion of the Board of Supervisors. Any process that requires such action by the county is not a fundamental property right. Similarly, recent CEQA cases have limited the Board's discretion, by confirming that they must employ feasible mitigation measures to mitigate significant impacts to Ag. lands. In addition, physical constraints and infrastructure limitations in the County preclude intense development of the entire inventory of the County's agricultural lands. Development of these lands will necessitate major investments of public and private funds for infrastructure that will not be available during the 30-year or so time horizon of the general plan. Thus, for many of these lands, the "property right" to develop to intense uses is illusory at this time.

Furthermore, the intent of Ag. land conservation is not to preclude the development of all agricultural lands. There is acknowledgement that Ag. lands will develop. The strategies try to limit the adverse impacts of that development by limiting its footprint, and/or by securing conservation easements on other lands. They also try to enhance the economic viability of Ag. lands to provide more attractive options to conversion. Finally, they aim to help Ag. land owners to successfully negotiate financial management, estate planning, and land sales challenges in a way that conserves the agricultural lands.

- 6) A common complaint is that Ag. landowners want equal treatment with others who can change their land use designations and zoning. All land owners who seek to change their land use designations and zoning are treated equally in that they all must feasibly mitigate the significant impacts of their development proposal. All land owners who seek to change their land use designation and zoning will have their proposals evaluated for compatibility with surrounding uses. While some Ag. elements do include special standards that must be met before Ag. land is converted to intensely developed uses (e.g. buffers, fences, compatibility with neighboring uses, etc.), these standards generally deal with the burdens of impact mitigation and nuisance avoidance applied to all general plan amendments and rezones.
- 7) Some Ag. land owners expressed a desire to be able to develop some of their land, and to keep other parts in agricultural uses. As noted above, that is a very viable Ag. land conservation strategy that could be employed in Calaveras County.

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- 8) Some Ag. land owners expressed a desire to have the right to totally convert their land to non-Ag. use. As noted above, changing one's land use designation and zoning currently requires a discretionary approval from the Board of Supervisor. As noted above, the General Plan Update expects that some property owners will want to convert their land to intensely developed non-Ag. uses. As also noted above, CEQA requires mitigation of significant impacts associated with Ag. land loss. One purpose of Ag. conservation policies is for the County to publicly craft the most appropriate means for consistently meeting the CEQA obligation, when a property is totally converted from Ag. to another use.
- 9) Some commenters were concerned that Ag. land conservation could interfere with the orderly growth of existing communities, by preserving Ag. lands too close the communities, and triggering later leap-frog growth. An Ag. Element map can place a higher priority on preserving some Ag. lands, and a lower priority for preserving other Ag. lands. In addition, identifying suitable spheres of influence, or urban limit lines, can help to provide space for orderly growth of existing cities and town centers, while maintaining the separations among distinct towns.
- 10) Some commenters noted the need for financial compensation for Ag. land preservation. Of course that is needed. Programs for Ag. easements, conservation easements, open space districts, mitigation banking are all available options to meet this need. We believe the public at large would strongly support contributing to Ag. land preservation.
- 11) One concern is that requirements of buffers for developments adjacent to Ag. lands are uncompensated takings. For a buffer to be a taking, the buffer mitigation would have to be insufficiently connected to an impact of the development (e.g. no nexus), or disproportional to the impact of the development (e.g. not roughly proportional). The Ag. buffers and fences are usually provided to protect future residents from noise, odors, pesticides, and trespass by livestock; and to protect Ag. neighbors from nuisance law suits, trash, noise, and trespass by dogs and minors. The requirements for buffers and fences can easily be shown to have a nexus to the impacts of the proposed development. The County will have to design the buffer and fencing requirements so that the buffers are roughly proportional in size to that needed to mitigate the harm. For example, the size of the buffer should not be much larger than needed to mitigate the noise impacts and pesticide spraying impacts. In these ways, the County can avoid buffer requirements becoming an unconstitutional taking.
- 12) Another concern regarding Ag. buffers is that their non-development puts pressure on other Ag. lands to develop. In one sense this is correct, in that it takes more land to develop the same number of homes when there are buffers. Thus

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buffers create pressure to develop more land. However, there are other factors that may reduce this pressure. Because buffers increase the cost of developing Ag. land, they make development of infill lands more competitive, thus decreasing the development pressure on Ag. land. Finally, because buffers limit threats to viable agricultural operations on neighboring land, they provide land owners with economic options to development, and thereby reduce the pressure to convert Ag. lands.

By addressing these concerns as noted above, the County can move forward with an Agricultural Element that specifies impact mitigation for the development of agricultural lands, and includes programs to assist in the long-term conservation of agricultural lands. This would be a feasible means of mitigating the otherwise significant impacts of agricultural land conversion associated with future development consistent with the General Plan Update map. This would help the County to comply with general plan law requirements to preserve open space lands.

## 2) Regulatory Framework

Ag. land conservation currently can involve a number of players.

In government, the State level, the Department of Conservation monitors the conversion of Ag. land to non-Ag. uses, but it does not regulate the loss in any way. Other state agencies, including the Sierra Nevada Conservancy, have programs to fund the acquisition of easements on Ag. land to protect oak woodlands and endangered species. While these may improve the economics of Ag. land uses, they do not keep the land in Ag. production per se. By contrast, the Williamson Act provides tax reduction incentives to Ag. land owners who agree to keep their land in agricultural production. However, since the Williamson Act subventions have been de-funded by the State, there is an even greater need for local Ag. land conservation efforts.

At the regional level, the County LAFCO can evaluate an annexation to a City for the potential impacts to Ag. land loss. However, unless the development of County Ag. lands requires annexation to a special district over which LAFCO has responsibilities, the issue of Ag. land loss does not reach LAFCO.

At the local level, the city and the County have the responsibility under CEQA to mitigate significant impacts associated with Ag. land conversion, but they do not have uniform or stable thresholds of significance, so Ag. land loss is often found insignificant. In addition, since they lack programs to mitigate the loss of Ag. land, they may consider the impact significant and unavoidable. Since CEQA has not been enforced by the State in Calaveras County, questionable government findings that allow for the unmitigated conversion of Ag. lands largely go unchallenged.

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In the private and nonprofit sector, there are Ag. land owners and non-profit conservancies that can voluntarily enter into agreements to conserve Ag. lands for Ag. production or other conservation objectives. However, these private efforts are underfunded and understaffed.

Also, the real estate market is unregulated when it comes to paying for the amenities that Ag. land provides to home purchasers. Those amenities (open space, scenic vistas, bucolic splendor, etc.) are the cornerstone of the rural atmosphere that attracts people to live in this area. The value of those amenities is capitalized into the purchase price of the homes people buy. However, none of that money goes to compensate the Ag. land owners who provide the amenities. This market flaw results in the retention of too little open space. To correct this market flaw, other communities have created property transfer fees dedicated to the acquisition of open space easements.

### 3) Impact Analysis

An impact analysis begins with thresholds of significance.

The General Plan Update project description or alternatives would result in significant adverse impacts on Ag. lands if they would:

- 1) Convert a substantial amount of Ag. land and/or Ag. operations to non-agricultural uses,
- 2) Extend urban services and infrastructure to or through Ag. lands,
- 3) Create conflicts by expanding the interface between urban development and Ag. lands,
- 4) Reduce the availability of water to agriculture,
- 5) Conflict with or result in cancellation of Williamson Act contracts, or
- 6) Otherwise interfere with the economic viability of agriculture.

The General Plan project description or alternatives would result in significant adverse impacts on forest lands if they would:

- 1) Convert forest land to non-forest use,
- 2) Extend urban services and infrastructure into forest lands,
- 3) Create conflicts by expanding the interface between urban development and forest land,
- 4) Conflict with or result in removal of lands from the TPZ,
- 5) Increase the threat of stand-replacing wildfire in forested areas,
- 6) Result in unsustainable levels of harvesting of forest products,
- 7) Interfere with USFS or BLM land uses or management, or conflict with their local plans, regional guides, or national directives.

An impact analysis proceeds by identifying useful tools for evaluating the impacts. Where possible, in addition to describing the impacts in the text qualitatively, it



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will be helpful to provide maps that provide geographic perspectives on the impacts, and tables that provide quantitative data. The maps and quantitative data are necessary to allow the public and decisionmakers to objectively compare the impacts of the project description and the alternatives. This information will also be essential to allow the decisionmakers to determine if the benefits of any option outweigh the unmitigated significant impacts. The County's failure to provide this information would not reflect a good faith effort at full disclosure.

Many aerial photos of Calaveras County, useful in identifying Ag. lands and forest lands, are readily available on the internet. By overlaying the proposed land use designation boundaries from the project description and the alternatives onto these photos, the DEIR would help provide a geographic perspective on the lands proposed for conversion to urban uses.

Similarly, County Ag. land maps can be reproduced with an overlay of the proposed land use designations of the project description and the alternatives. This will provide a qualitative and geographic perspective on the lands proposed for conversion to urban uses.

A map of the Williamson Act Contract lands and their proposed land use designations under the project description and the alternatives would geographically depict the areas where the conflicts with the contract will occur.

A map of the current TPZ lands and the proposed land use designations under the project description and the alternatives would geographically depict the areas where conversion pressure will be heightened.

Another useful overlay would show the existing utilities, and the planned extensions of roads, water, sewer, and power utilities into the forests and Ag. lands for the project description and the alternatives. This would geographically depict lands where conversion pressure will be heightened.

Finally, an overlay of the land use designations onto the map of ground water availability from the County's groundwater study would highlight isolated areas where scarce groundwater resources should remain set aside for agricultural use, and not allocated to more intensive development.

These maps can then be used to calculate the miles of interface between urban uses and Ag. /forest land uses for the project description and the alternatives.

The County has used the U-plan model during the general plan update process. Please employ U-plan to depict likely development patterns under the project description and all of the alternatives, at both the plan horizon year and at plan build-out.

In table format, please identify the acres of Ag. lands and forest lands subject to Medium or High conversion potential by the project description and the alternatives,

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similar to the table EDAW produced for the 2004 El Dorado County General Plan EIR, seen below.

<b>Table 5.2-5 Agricultural Land Subject to Medium or High Conversion Potential<sup>1</sup></b>			
Agricultural Land Category	No Project/1996 General Plan Alternatives <sup>2</sup> (acres)	Roadway Constrained 6- Lane "Plus" Alternative (acres)	Environmentally Constrained Alternative (acres)
Important Farmland			
Prime	78	50	70
Statewide Importance	37	27	27
Unique	757	604	632
Local Importance	21,082	11,990	15,984
Subtotal	21,954	12,671	16,713
Grazing Land	40,783	28,715	21,689
Choice Soils	36,658	30,788	24,663
Agricultural District/Agricultural Land	172	287	0
Williamson Act Contract	4,582	216	242
<b>Total</b>	<b>104,149</b>	<b>72,677</b>	<b>63,307</b>
<p><sup>1</sup> For the purposes of this analysis, land with medium or high conversion potential is designated to be land defined in the General Plan for nonagricultural land uses: High-Density Residential, Medium-Density Residential, Low-Density Residential, Multifamily Residential, Commercial, Tourist Recreational, Research and Development, Adopted Plan, and Public Facility.</p> <p><sup>2</sup> Although the No Project and 1996 General Plan alternatives have the same land use designations, development intensity would differ. Under the No Project Alternative, development would be restricted to one dwelling unit per parcel regardless of size. Subdivision would be allowed under the 1996 General Plan Alternative.</p> <p>Sources: El Dorado County Planning Department 2002, 2003; EDAW 2003</p>			

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Also, in tabular form, please identify acres of each land use designations placed on Williamson Act Contract lands for the project description and the alternatives, similar to similar to the table EDAW produced for the 2004 El Dorado County General Plan EIR, seen below.

<b>Table 5.2-6 Land Use Designations of Williamson Act Contract Lands by Equal-Weight Alternative</b>			
General Plan Designation	No Project/1996 General Plan (acres)	Roadway Constrained 6-Lane "Plus" (acres)	Environmentally Constrained (acres)
Agricultural Land <sup>1</sup>	N/A	N/A	32,768
Adopted Plan	N/A	0	2
Low-Density Residential	4,168	107	135
Medium-Density Residential	309	3	0
Natural Resources	5,480	34,551	7,458
Open Space	87	87	867
Rural Residential/Rural Lands <sup>2</sup>	31,704	6,999	1,297
Tourist Recreational <sup>3</sup>	105	105	105
<b>Total</b>	<b>41,853</b>	<b>41,853</b>	<b>41,853</b>
<p><sup>1</sup> The Agricultural Lands designation is used only in the Environmentally Constrained Alternative.</p> <p><sup>2</sup> The Rural Lands designation is used in the Roadway Constrained 6-Lane "Plus" and Environmentally Constrained alternatives; the Rural Residential designation is used in the No Project and 1996 General Plan alternatives.</p> <p><sup>3</sup> The Bacchi Ranch, which is under Williamson Act contract, includes a 98-acre portion that is separated from the bulk of the property by SR 49 and, in addition to being used as grazing land during winter, is used by river rafting companies under special use permits. For this reason, this portion of the property and the adjoining portion of SR 49 are designated Tourist Recreational.</p> <p>Notes: Numbers may not total due to rounding. N/A = This designation is not used with this alternative.</p> <p>Source: EDAW 2003</p>			

### 4) Mitigation Measures

The proposed Agriculture Element is plagued by provisions that are phrased in optional and promotional language rather than in mandatory and enforceable language. As yet, there are no quantified objectives or standards, in the General Plan Update to protect agricultural lands. As a result, many of these provisions cannot be relied upon for CEQA mitigation. To make these general goals and vague policies effective, it is essential for the General Plan Update to set quantified Ag. Land conservation objectives, and to select feasible implementation programs to achieve those objectives, and to mitigate Ag. land loss. Two to one mitigation for Ag. land conversion, or 200-foot setbacks for conflicting uses from Ag. lands, are good examples of quantified implementation measures. Such measures could be combined with others to form the open space action plan required in the general plan.

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With regard to the Ag. land conservation policies in the general plan project description; we again encourage you to strengthen the policy language to give county government, Ag. land owners, nonprofit conservancies, real estate speculators, and land developers clear direction regarding their roles, rights and responsibilities.

In addition to the above modifications to the project description draft general plan policies, we also encourage the County to follow the suggestions of our member group the Foothill Conservancy. Although originally drafted for use in Amador County, they may have similar utility in Calaveras County.

### **Ag preservation principles (Drafted January 1, 2007)**

- Preserve agricultural lands for their economic, social, scenic, wildlife, watershed, and other values.
- Promote policies and programs that help keep land in agricultural use, both now and in the future.
- Avoid land use planning policies and practices that encourage or facilitate conversion of agricultural lands to other uses.
- Avoid infrastructure extensions or improvements that encourage or facilitate conversion of agricultural lands to other uses.
- Adopt mitigation policies for conversion of agricultural land to other uses to ensure no net loss of agricultural land.
- Ensure that increased commercial uses allowed on agricultural lands serve the preservation of agriculture rather than allowing or encouraging the conversion of agricultural lands or areas to other uses.
- Ensure that increased commercial uses allowed on agricultural lands do not require urban levels of service and infrastructure.

As seen below, many of the proposed General Plan Update policy strategies are well known and commonly used in other communities. However, their effectiveness depends on the implementation tools selected to give effect to the policies. The General Plan Update needs to select the type of implementation tools the County will employ to make the policies effective, and to mitigate Ag. land loss.

#### **Policy Strategies:**

- Direct Growth to Urban Centers
- Restrict Residential Development in rural areas
- Economic Incentives

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- Boosting Local Farm Economies
- Agriculture Element in General Plan
- Reducing Conflicts at Farm-Urban Edge
- Higher Density and Infill development
- New Towns not on Ag. Land

### **Implementation Tools:**

- Agricultural Zoning
- Williamson Act Contracts
- Right to Farm Ordinances
- Mitigation for Farmland Loss
- LESA – Land Evaluation & Site Assessment
- Ag. Buffers
- Conservation Easements
- Monitoring Farmland Conversion
- Resource Incentives to Landowners
- Urban Limit Lines
- LAFCO Annexation Reviews
- City & County Tax Revenue Sharing
- City & County Development Project Standards  
& Review Cooperation

(From: UC Extension, *Optional Policies and Tools for Farmland and Open Space Protection in California*, 2004.)

Case studies indicate that communities that include more than one strategy for Ag. land conservation are more likely to be successful.

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Case Study	Stabilize agricultural land use & values	Direct growth away from best farmland	Promote more efficient development	Finance permanent farmland protection	Promote agricultural economic viability
<b>Marin</b> Agricultural Land Trust & County Zoning	X	X	X	X	
<b>Monterey</b> County Agricultural & Historical Land Conservancy	X	X	X	X	
<b>Ventura</b> "Save Our Agricultural Resources" Initiative	X	X	X		
<b>Napa</b> County Agricultural Land Preservation Initiative	X	X	X		
<b>Tulare</b> County Rural Valley Lands Plan	X	X	X		
<b>Yuba City</b> Sphere of Influence Adjustment	X	X	X		
<b>South Livermore</b> Agricultural Mitigation Plan		X		X	X
<b>Yolo-Davis</b> Development Control & Tax Sharing	X	X			
<b>Visalia</b> Concentric Growth Boundaries	X		X		
<b>Gilroy-Santa Clara</b> Joint Growth Boundary Agreement	X				X
<b>Sonoma</b> Agricultural & Open Space District		X		X	
<b>San Diego County</b> Plan for the Future of Agriculture		X			X
<b>Fresno</b> Landscape of Choice			X		
<b>Sutter</b> County Ranchette Zoning			X		
<b>Davis</b> Farmland Mitigation Ordinance				X	
<b>Fairfield</b> Mello-Roos Community Facilities Districts				X	
<b>Martis Valley</b> Real Estate Conveyance Fees				X	
Farmland Mitigation in <b>San Joaquin County</b>				X	

*(Case Studies in Ag. Land Protection, From American Farmland Trust)*

There are a number of keys to a successful program Ag. land conservation program:

- The program must be adopted by the County and/or City.  
(No adoption = No program)
- The program needs to inspire participation.  
(No participants = No program)
- The program needs an Ag. anchor.  
(Protecting land for trails, and habitat, and value added stores may not be enough to keep the land in Ag. production.)
- Multiple financing methods are best.  
(I.e. Private conservation easements, and mitigation fees, and public grants.)

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- For mitigation: actual easements are better than in lieu fees.  
(You can't raise cattle in a bank account.)
- Your program needs management.  
(No staff = No program. There is no such thing as a "self-implementing" program.)

We encourage the County staff and consultants to gather both the proponents and opponents of the draft Ag. Element, along with representatives of the Planning Commission and the Board of Supervisors, to try to work out Ag. goals, policies, and implementation programs that all can support. This may involve both deleting policies or programs that the County has reconsidered, and adding other policies or programs that may work better in Calaveras County. Good ideas can be gleaned from the surrounding counties that have included or proposed Ag. land conservation policies in their general plans. This process may also involve locating some Ag. land conservation policies and programs to more suitable elements of the General Plan Update (e.g. Land Use, Housing, Conservation, Open Space, Safety, Noise, Economic Development) and cross referencing them in the Ag. Element. We believe this would be a fruitful process to achieve effective Ag. land conservation in Calaveras County.