# 3.3 Agricultural Resources

#### 3.3.1 Introduction

This section addresses the potential environmental impacts to agricultural resources from implementation of the conceptual water transaction program and demonstrates the effectiveness of the proposed project (i.e., the proposed General Plan policies and amendments) in reducing or mitigating environmental impacts of the program.

# 3.3.2 Scoping

WBC provided comments on agricultural resources during the EIR scoping process. The comments and the location where each comment is addressed in this section are provided in Table 3.3-1, below.

Table 3.3-1 Agricultural Resources Scoping Comment

Agency	Comment	Location in Agricultural Resources Section
WBC	Consider alternatives for water purchase without land.	Alternatives are discussed in Section 4.0.
WBC	WBC can lease back purchased land for agriculture to reduce effects associated with loss of agricultural land.	Addressed in Impact Agricuture-2.

# 3.3.3 Existing Environment

#### **Regional Setting**

The agricultural operations that are conducted on public and private land are an important component of the County's economy and cultural identity (Mono County, 2018). Most of these agricultural operations occur in valleys. Privately-owned lands outside of community areas are typically used for agriculture and grazing (Mono County, 2015). Livestock grazing, timber production, and fuelwood cutting occur on public lands under the jurisdiction of BLM, USFS, and NPS primarily (Mono County, 2015; Mono County, 2018).

The two most valuable agricultural products in the County are field crops, livestock, and livestock products, representing over 99 percent of the total value of agricultural production within the County in 2018, as shown in Table 3.3-2. Forest products, fruit and nut crops, and nursery products are also produced in the County, representing 0.5 percent of the total value of agricultural production within the County in 2018 (Inyo and Mono County, 2018). Alfalfa hay production is the most profitable field crop in the County, constituting 71 percent of the total value of pastureland in 2018 (Inyo and Mono County, 2018). Irrigated pasture is worth significantly more per acre than rangeland pasture (Inyo and Mono County, 2018).

Table 3.3-2 Agriculture Types in Mono County in 2018

Type of Agriculture	Total Value	Percentage of Total	
Field Crops	\$16,235,000	50.19%	
Livestock and livestock products	\$15,944,000	49.29%	
Forest Products	\$86,300	0.27%	
Fruit and nut crops	\$61,200	0.19%	
Nursery Products	\$20,000	0.062%	
Total	\$32,346,500	100%	

Source: (Inyo and Mono County, 2018)

The acres of land in the County that were under active agricultural production in 2018 are identified in Table 3.3-3. Most of the land in agricultural use, including publicly held land, is still used for livestock production.

Table 3.3-3 Agriculture in Mono County in 2018

Field Crops	Production (Acre)	
Alfalfa hay	8,014 <sup>a</sup>	
Pasture, irrigated	20,500	
Pasture, rangeland	1,078,000	
Garlic, grain hay, sudangrass, and other hay	1,532 <sup>b</sup>	
Fruit and nut crops	17	
Nursery stock	1	

#### Note:

- <sup>a</sup> Calculated from 58,100 tons of alfalfa hay using a rate of 7.25 tons of alfalfa per acre (Putnam, Summers, & Orloff, 2007).
- Unit was not indicated for miscellaneous field crop in the 2018 Inyo and Mono counties Crop and Livestock Report.

Source: (Inyo and Mono County, 2018)

#### **Project Setting**

### **Antelope Valley**

Land in Antelope Valley is used mainly as rangeland during the growing season, with some alfalfa and row crops production (RCD, 2014). In 2014, 3,000 acres of land were used to grow alfalfa and garlic, which comprised approximately 22 percent of the total land area of the valley (RCD, 2014). Irrigated land within Antelope Valley comprised 51.7 percent of the valley in the project area, as shown in Table 3.3-4. A larger portion of the valley has water rights in comparison to the areas irrigated each year.

### **Bridgeport Valley**

The agricultural land in Bridgeport Valley is used exclusively as rangeland during the growing season. Alfalfa is not produced within Bridgeport Valley (RCD, 2014). Bridgeport Valley receives significantly more water than Antelope Valley due to the four large tributaries to the East Walker River that run through the valley. These tributaries distribute surface water throughout the valley through multiple irrigation ditches (RCD, 2014). Irrigated land represents approximately 66.8 percent of the valley in the project area, as shown in Table 3.3-4.

Table 3.3-4 Agricultural Land in the Project Area (Acres)

Project Area	Decree Water-Righted Land	Irrigated Agricultural Land (2010) <sup>a</sup>	Total Land
Antelope Valley	24,172.4	11,276	21,815
Bridgeport Valley	24,795.4	16,801	25,168
Total	48,967.8	28,077	46,983

#### Note:

### **Farmland Mapping and Monitoring Program**

The Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency Department of Conservation (DOC) designates land based on its suitability for agricultural use. The DOC operates the FMMP with the objective of providing maps and statistical data to the public, academia, and local, state, and federal governments in order to assist informed decision-makers on California's farmland. Under the program, land is rated and mapped for agricultural use based on soil quality and irrigation status (DOC, 2014). The County has not been mapped pursuant to the FMMP, therefore, there is no FMMP-designated Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance within the project area (DOC, 2016; Mono County, 2015).

#### **Agricultural Conservation Easements in Mono County**

#### Overview

#### Land Conservation Act Contracts

As of 2014, 13,439 acres of agricultural land are enrolled in California Land Conservation Act (LCA) contracts in the County (CDC, 2016). 13,310 acres are designated as prime farmland, and 129 acres are designated as other enforceable restrictions (CDC, 2016). Other enforceable restrictions include agricultural conservation and open space easements reported by participating jurisdictions that are enrolled in LCA Contracts. The County claimed \$66,548 in open space subvention act payments in 2014 to support LCA contracts (CDC, 2016). However, pursuant to Government Code Section 16148, subvention payments were eliminated in the 2010-2011 Fiscal Year and have not been restored (CDC, 2016). The County still supports contracts that were made prior to Fiscal Year 2009-2010, but has stopped accepting new contracts until Open Space Subvention payments are restored (Mono County, 2015).

<sup>&</sup>lt;sup>a</sup> An additional 751 acres of land has historically been irrigated but was not in 2010.

### Agricultural Land Easements under the Farm Bill

The Natural Resources Conservation Service partially funds six agricultural land easements (ALEs) in the County that are enrolled in the Agricultural Conservation Easement Program. The six ALEs span 7,667.16 acres, and NRCS has provided \$4,956,989 in funding to these easements (Palmer, 2019).

# **Antelope Valley**

In Antelope Valley, there are 502.4 acres of land enrolled in California LCA contracts (better known as Williamson Act, discussed in Section 3.3.4), (DOC, 2008). LCA contract land within Antelope Valley comprises approximately 23 percent of the valley in the Walker basin area, as shown in Table 3.3-5.

Table 3.3-5 Conservation Easements and LCA Contract Land in the Project Area (Acres)

Project Area	Conservation Easement	LCA Contract Land	Total Land
Antelope Valley	-	502.4	21,815
Bridgeport Valley	9,285.8	11,050.8	25,168
Total	9,285.8	11,553.2	46,983

Source: (DOC, 2008)

# **Bridgeport Valley**

In Bridgeport Valley, there are 11,050.8 acres of land enrolled in LCA contracts (DOC, 2008). Four of the agricultural conservation easements in Bridgeport Valley are ALEs supported by the Farm Bill. These ALEs include Centennial Ranch, Sceirine Point Ranch, Sinnamon Meadows, and an unnamed ALE under the Grasslands Reserve Program (U.S. Endowment for Forestry and Communities, 2019). LCA contract land and conservation easement land within Bridgeport Valley comprises 43.9 percent and 36.9 percent of the valley in the Walker Basin area, respectively (refer to Table 3.3-5).

Eight agricultural conservation easements covering of 13,720.6 acres of land are located within Bridgeport Valley, which severely limit the separation of land and water. Agricultural easements in Bridgeport Valley are provided in Table 3.3-6. For example, the 2011 Centennial Ranch Conservation Easement preserves all rights to use all stream flow, storage rights, and supplemental water rights associated with the property, and allows the transfer and lease of water rights for up to 5 years. The Sceirine Ranch Conservation Easement prohibits the permanent transfer and lease of water rights. Temporary water transfers are permitted within the Sceirine Ranch Conservation Easement for excess water not needed for agricultural purposes or open space.

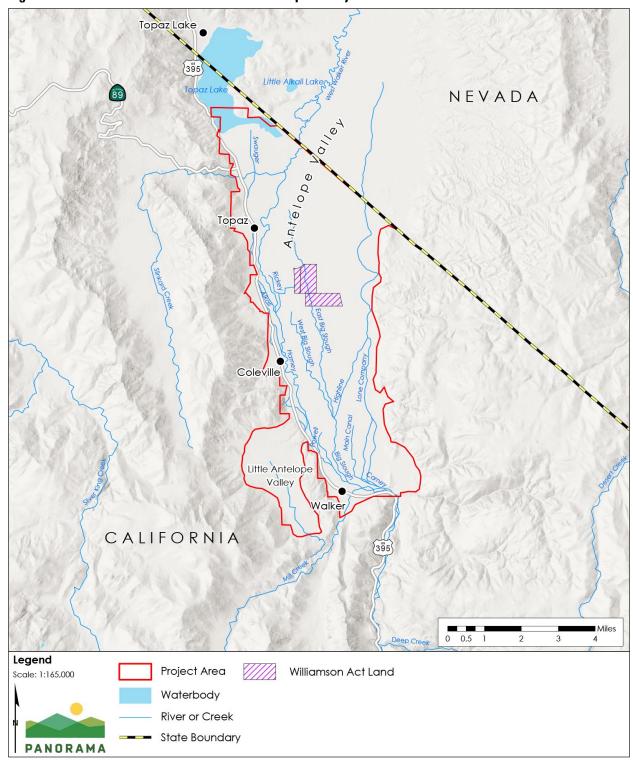


Figure 3.3-1 Conservation Easements in Antelope Valley

Source: (USGS, 2013; USGS, 2016; Tele Atlas North America, Inc., 2018; US Endowment for Forestry and Community, 2019; California Department of Conservation Division of Land Resource Protection, 2008)

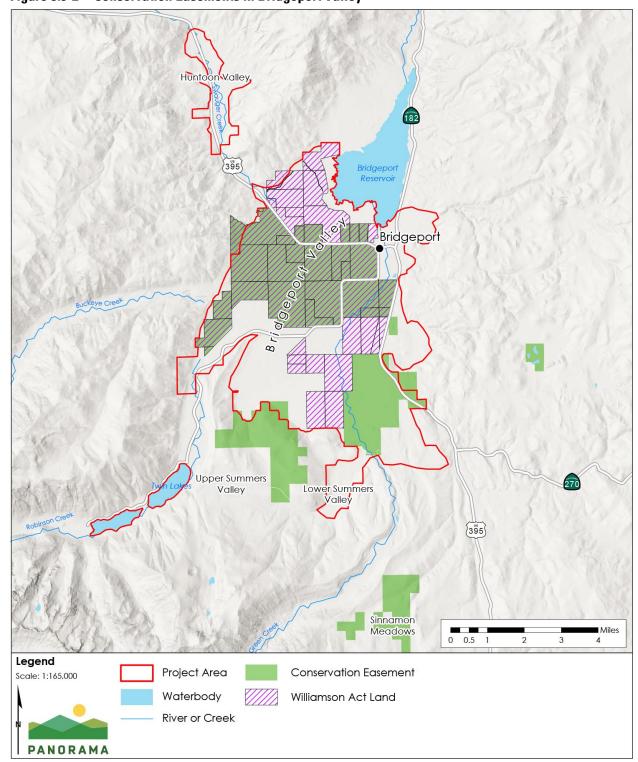


Figure 3.3-2 Conservation Easements in Bridgeport Valley

Source: (USGS, 2013; USGS, 2016; Tele Atlas North America, Inc., 2018; US Endowment for Forestry and Community, 2019; California Department of Conservation Division of Land Resource Protection, 2008)

Table 3.3-6 Conservation Easements in Bridgeport Valley

Conservation Easement Name	Easement Holder	Funding Source	Date Established	Total Acres
Bridgeport Valley Conservation Easement (Lacey Wood Centennial)	American Land Conservancy	<ul> <li>Unknown</li> </ul>	2002	6,391.6
Centennial Ranch	Eastern Sierra Land Trust	<ul><li>CFCP</li><li>ACEP</li><li>EEMP</li></ul>	2011	699
Eastern Sierra Land Trust Easement	Eastern Sierra Land Trust	<ul> <li>Unknown</li> </ul>	2005	75
Sceirine Point Ranch	Eastern Sierra Land Trust	<ul><li>ACEP</li><li>SALCP</li><li>CDA</li></ul>	2018	2,352.7
Unnamed (Grasslands Reserve Program)	NRCS	• ACEP	2016	2,033.9
Sinnamon Meadows	Eastern Sierra Land Trust	<ul><li>CWCB</li><li>CDFW</li><li>Sierra Nevada Conservancy</li><li>ACEP</li></ul>	2014	1,234.4
Conway and Mattly Ranches	Mono County	• Resources Legacy Fund	2014	799.6
DeChambeau Creek	Eastern Sierra Land Trust	• Unknown	2010	134.4
Total Conservation Easement Acreage				13,720.6

#### Note:

Funding source acronyms:

ACEP: Agricultural Conservation Easement Program

CDA: California Deer Association

CDFW: California Department of Fish and Wildlife CFCP: California Farmland Conservancy Program

EEMP: Environmental Enhancement and Mitigation Program SALCP: Sustainable Agricultural Lands Conservation Program

Sources: (U.S. Endowment for Forestry and Communities, 2019; Eastern Sierra Land Trust, 2019; Eastern Sierra Land Trust, 2019; Eastern Sierra Land Trust, 2019)

# 3.3.4 Regulatory Setting

#### **Federal**

# **Agricultural Improvement Act of 2018**

The Agricultural Improvement Act of 2018, commonly known as the 2018 Farm Bill, builds upon the 2014 Farm Bill which consolidated three former conservation easement programs (the Wetlands Reserve Program, the Grassland Reserve Program, and the Farm and Ranch Land Protection Program) into one program, the Agricultural Conservation Easement Program (ACEP). The goal of the ACEP is to protect the long-term viability of the nation's food supply by preventing the conversion of farmland to non-agricultural uses. NRCS manages the ACEP, and provides financial assistance to eligible partners including Native American Tribes, state and local governments, and non-governmental organizations to buy conservation easements on farm and ranch land (USDA, 2018). NRCS can pay up to 50 percent of the appraised fair market value of the conservation easement, and up to 75 percent of the easement value if the lands are enrolled as grasslands of special environmental significance (USDA, 2018). The 2018 Farm Bill increases the mandatory funding for the ACEP to \$450 million annually for 2019 through 2023 (Congressional Research Service, 2019).

The two enrollment options are ALEs and Wetland Reserve Easements (WREs). To be eligible for enrollment, the land must:

- Be privately owned or tribal agricultural land on a farm or ranch;
- Be subject to a written pending offer from an eligible entity to purchase an agricultural land easement;
- Contain at least 50 percent prime, unique, or farm or ranch land of the state or of local importance; contain historical or archeological resources; protect grazing uses and related conservation values; or support a state or local policy consistent with the purpose of the ACEP;
- Be identified as cropland, pastureland, rangeland, grassland, or other grazing land, and/or nonindustrial private forest land that contributes to the economic viability of the parcel or serves as a buffer from development;
- Have access to markets, infrastructure, and other agricultural support services; and
- Be experiencing development pressure.

Portions of agricultural land in the project area are currently enrolled in LCA contracts (Refer to Table 3.3-5). Four of the agricultural conservation easements in Bridgeport Valley are ALEs supported by the Farm Bill. Participating landowners who sign into conservation easements agree not to convert the land to non-agricultural use but still retain all rights to use the property for agriculture. Lands protected by agricultural conservation easements receive additional public benefits including the preservation of wildlife habitat and environmental quality, and the protection of open space.

# **State and Regional**

#### Williamson Act

The goal of the Williamson Act, officially known as the California LCA of 1965, is to preserve agricultural and open-space lands through property tax incentives and voluntary restrictive use contracts with local governments. This act allows private landowners to enter into contracts with counties and cities to restrict specific parcels of land to agricultural or related open-space uses under a minimum 10-year rolling term contract (CDC, 2016). In return, landowners receive property tax assessments at a rate consistent with agricultural or open-space use rather than potential market value. Two conservation easement contracts are available under the Williamson Act including LCA contracts and Farmland Security Zone (FSZ) contracts.

Only land within an agricultural preserve is eligible to enter into an LCA contract. Agricultural preserves are regulated by rules and restrictions outlined in the Williamson Act to ensure that the land within the preserve is maintained for agricultural or open space use. Each agricultural preserve has specific regulations or land use, but generally any agricultural commercial use is permitted. LCA contracts are either designated as prime agricultural land or non-prime agricultural land. Prime agricultural land is defined as meeting one or more of the criteria set forth under the California Government Code Section 51201 (C).

Non-prime agricultural land is land under an LCA contract that does not meet any of the criteria for classification as Prime Agricultural Land. Agricultural operations still occur on non-prime agricultural land; however, these operations are usually limited to grazing or non-irrigated crops. Portions of agricultural land in the project area are currently enrolled in LCA contracts (refer to Table 3.3-5). No land in the project area is enrolled in FSZ contracts.

### California Open Space Subvention Act

The California Open Space Subvention Act (OSSA) was enacted in 1971 to provide partial replacement of local property tax revenues as a result of participation in the Williamson Act (CDC, 2016). The economic recession that began in the late 2000s resulted in a reduction and eventual elimination of Open Space Subvention payments to local governments. California state subvention payments to local governments stopped beginning in 2010 pursuant to Government Code Section 16148. The state continues to support local governments and landowners in the form of technical assistance, interpretation of the Williamson Act, issue and policy research, contract enforcement, and preparation of the Land Conservation Act Status Report (CDC, 2016). The County receives aid from the state through OSSA for the agricultural land currently enrolled in LCA contracts.

# California Farmland Conservancy Act of 1995

The California Farmland Conservancy Act of 1995 created the California Farmland Conservancy Program (CFCP) that preserves important agricultural resources by supporting local efforts to establish agricultural conservation easements (CA Natural Resources Agency, 2018). The CFCP is managed by the California Department of Conservation's Division of Land Resource Protection which provides grants to qualifying applicants including local agencies and non-profit organizations to purchase agricultural conservation easements. For a qualifying

applicant to receive a grant through the CFCP, the agricultural easement must have a willing seller, documented development pressure, local government support, and match funding (CA Natural Resources Agency, 2019). Several conservation easements in Bridgeport Valley are partially funded under the CFCP including the Lacey Wood Centennial Conservation Easement and the Centennial Ranch Conservation Easement (U.S. Endowment for Forestry and Communities, 2019).

# **Environmental Enhancement and Mitigation Program**

The Environmental Enhancement and Mitigation (EEM) Program, as provided by California Streets and Highways Code Section 164.56 (Article XIX, Section 1, of the State Constitution) offers grant funding from to local, state, and federal government agencies and non-profit organizations for eligible projects (CA Natural Resources Agency, 2019). Eligible projects are those that mitigate the environmental effects from construction or modification of state transportation facilities. The EEM Program has supported the enrollment of several agricultural conservation easements in Bridgeport Valley including the Lacey Wood Centennial Conservation Easement and the Centennial Ranch Conservation Easement (refer to Table 3.3-6).

### Sustainable Agricultural Lands Conservation Program

The Sustainable Agricultural Lands Conservation Program (SALCP) was created in 2015 to combat greenhouse gas emissions by investing in farmland conservation (CalCAN, 2019). The SALCP is part of the larger Affordable Housing and Sustainable Communities (AHSC) Program which receives funding from the Greenhouse Gas Reduction Fund (GGRF) Budget. Ten percent of the funds for the AHSC are allocated for the SALCP. The SALCP uses AHSC funding to provide grants to eligible entities including cities, counties, non-profit organizations, resource conservation districts to purchase conservation easements (CA Strategic Growth Council, 2019). The SALCP has funded 60 easements, four of which are located in the County including the Sceirine Point Ranch Conservation Easement in Bridgeport Valley (CalCAN, 2019; Eastern Sierra Land Trust, 2019).

### Local

#### Mono County General Plan

The purpose of the Mono County General Plan is to support the goals of Mono County. The following existing General Plan policies pertain to the conservation of agricultural resources and are applicable to water transactions in the project area (Mono County, 2018):

#### Land Use Plan

- **Objective 1.G.** Protect open space and agricultural lands from conversion to and encroachment of developed community uses.
- **Policy 1.G.1.** Protect lands currently in agricultural production.
- **Policy 2.A.9.** Maintain water quality for fishery habitat by enforcing the policies contained in the Water Quality and Agriculture / Grazing/ Timber sections of the Conservation/Open Space Element.

- **Policy 4.A.4.** As a general goal, retain the existing privately owned land base in the Antelope Valley.
- **Objective 4.B.** Maintain the scenic, historic, agricultural, and natural resource values in the Valley.
- **Policy 4.B.2.** Preserve the agricultural lands and natural resource lands in the Antelope Valley.
- **Policy 4.B.3.** Work with appropriate agencies to manage water resources in a manner that protects natural, agricultural, and recreational resources in the Antelope Valley.
- **Policy 6.A.3.** Agricultural uses should be assigned an agricultural land use designation.
- **Policy 6.A.6.** Preserve the rural and wilderness character while allowing cottage industries and agricultural uses.
- **Policy 7.A.3.** Designate land presently in agricultural use as "Agriculture," and establish a Development Credits program, including voluntary Transfer of Development Rights provides, which will encourage clustering development away from irrigated land.
- **Objective 7.B.** Maintain the scenic, agricultural, and natural resource values in the Bridgeport Valley.
- **Policy 7.B.1.** Preserve agricultural lands and wetlands.

#### Conservation and Open Space Plan

- GOAL 3. Ensure the availability of adequate surface and groundwater resources to meet existing and future domestic, agricultural, recreational, and natural resource needs in Mono County.
- GOAL 5. Preserve and protect agricultural and grazing lands in order to promote both the economic and open-space values of those lands.
- **Objective 5.A.** Encourage the retention of agricultural and grazing lands.
- **Policy 5.A.1.** Discourage the conversion of agricultural lands to nonagricultural uses.
- **Policy 7.A.3.** Designate land presently in agricultural use as "Agriculture," and establish a Development Credits Program, including voluntary Transfer of Development Rights provisions, which will encourage clustering development away from irrigated land.

# 3.3.5 Significance Standards and Methodology

### Significance Criteria

For the purposes of this EIR and consistent with Appendix G of the CEQA Guidelines, the conceptual water transaction program is considered to have a significant impact on agriculture resources if it would:

- a. 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;
- b. Conflict with existing zoning for agricultural use, or a Williamson Act contract; or
- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

Implementation of the conceptual water transaction program would have no impact on forestry resources because no forestry resources occur in the irrigated lands that could be subject to water transactions. Implementation of water transactions would not create the possibility for conversion of forestry to non-forest uses. Therefore, significance criteria c and d are not discussed further.

# Approach to Analysis

The analysis presented in this section was performed using qualitative and comparative methods that involved identifying potential impacts from various water transaction types to agricultural resources. Temporary leasing of water rights for a year would mimic drought conditions in agricultural areas because the water would be reapplied to the site the subsequent year. Temporary leasing of water would not convert agricultural land to non-agricultural use and would not have a significant effect on agricultural use of the land. The impact analysis below focuses on permanent acquisition of decreed or storage water rights only. The maximum potential water transfer under permanent water transaction scenarios is presented in Section 2.7.4 of the Project Description. In all cases, it is assumed that a water transaction of decreed water rights would only transfer 53 percent of the water from any parcel that is involved in the transaction due to the decision made by the SWRCB and the Nevada State Engineer that the NFWF's exercise of those rights is limited to the consumptive use portion of the rights (approximately 53 percent). Water transactions of storage water rights could transfer the 100 percent of the water right that is held in storage.

# 3.3.6 Impact Discussion

Impact Agriculture-1: Would a water transaction program 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? (Significance criterion	Significance Determination of Proposed Project (GP Policies)	Significance Determination of Conceptual Water Transaction Program
a)	No Impact	No Impact

# **Permanent Acquisition of Decreed or Storage Water Rights**

The County has not been mapped farmland pursuant to the Farmland Mapping and Monitoring Program; therefore, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is designated in the project area. The conceptual water transaction program would not contribute to the conversion of designed Farmland to non-agricultural use. No impact would occur.

### **Proposed Project**

The adoption of General Plan policies and amendments that reduce and mitigate the effects of a conceptual water transaction program would not, themselves, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The proposed project would have no impact on designated Farmland.

Impact Agriculture-2: Would a water transaction program conflict	Significance Determination of Proposed Project (GP Policies)	Significance Determination of Conceptual Water Transaction Program
with existing zoning for agricultural-use or Williamson Act Contract? (Significance criterion b)	No Impact	Potentially Significant

#### **Permanent Acquisition of Decreed or Storage Water Rights**

The County has an integrated land use designation and zoning district overlay. Lands associated with decreed flow water right are generally designated as Agriculture. Approximately 23 percent and 43.9 percent of the land in Antelope Valley and Bridgeport Valley, respectively, are under Williamson Act Contracts. If decreed or storage water rights were acquired under the WBRP from lands subject to Williamson Act Contract, the acquired water rights would be separated from the land under Williamson Act contract. The transfer of decreed or storage water rights from land subject to Williamson Act contract would be a conflict with the contract and a significant impact. Under proposed General Plan policy Action 4.B.2.e, the County would oppose any transfer of water from lands bound by a Williamson Act contract to avoid conflict with the contract.

The WBC commented during scoping that they could lease back land to farmers and ranchers when water purchases occur with land and grazing has continued on areas that were subject to water transactions in Nevada. The land uses may change from irrigated crops or livestock to dryland crops or potentially open space. The loss of irrigation water from the land would not

allow development on the lands. In addition, fallow and dryland agricultural areas currently occur in the Antelope and Bridgeport Valley area and these areas do not conflict with the existing zoning for agricultural use. Impacts on existing zoning for agricultural use would be less than significant.

### **Proposed Project**

The adoption of General Plan policies and amendments that reduce and mitigate the effects of a conceptual water transaction program would not, themselves, conflict with existing zoning for agricultural use or Williamson Act Contract. The proposed project would have a beneficial impact by avoiding conflicts with a Williamson Act Contract. The proposed project would have no adverse impact.

Impact Agriculture-3: Would a water transaction program involve other changes in the environment that could result in conversion of	Significance Determination of Proposed Project (GP Policies)	Significance Determination of Conceptual Water Transaction Program
Farmland to non-agricultural use? (Significance criterion e)	No Impact	No Impact

### **Permanent Acquisition of Decreed or Storage Water Rights**

As discussed in Impact Agriculture-1 above, there is no designated Farmland within the project area. Implementation of a conceptual water transaction program would not involve other changes in the environment that would convert Farmland to non-agricultural use. No impact would occur.

#### **Proposed Project**

The adoption of General Plan policies and amendments that reduce and mitigate the effects of a conceptual water transaction program would not, themselves, involve other changes in the environment that could result in conversion of Farmland to non-agricultural use. No impact would occur.

#### 3.3.7 References

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