4.2 AGRICULTURAL RESOURCES

4.2.1 Setting

a. Regional Agriculture Production. California agriculture ranks first in the nation, and its 77,900 farms and ranches received a record $46.4 billion for their products in 2013. California produces over 400 commodities and nearly half of all U.S. grown fruits, nuts, and vegetables on 25.5 million acres of farmland (United States Department of Agriculture [USDA], 2015). San Luis Obispo County and the Central Coast region are important key agricultural centers within the State. Wine grapes and strawberries lead a list of high value specialty crops grown in the County's fertile soils and Mediterranean climate. The region's agricultural industry is a crucial part of the local economy. It provides employment and income directly for those in agriculture, and it helps drive growth in the tourism industry, which in turn generates further economic activity and consumer spending. As shown in Table 4.2-1, agricultural production has risen steadily over the last 10 years from $594 million in 2005 to over $921 million in 2013. Production decreased to nearly $829 million in 2015, representing a 10 percent decline from 2013 due to ongoing, severe drought conditions. Strawberries, wine grapes, and cattle produced the most revenue, bringing in approximately $223 million, $146 million, and $66 million, respectively. Other crops in the County's top ten agricultural producers include broccoli, vegetable transplants, cut flowers, avocados, head lettuce, leaf lettuce, and lemons (San Luis Obispo County Department of Agriculture Weights and Measures, 2015). Agricultural operations in the County provide 20,645 jobs. Table 4.2-2 summarizes agricultural productivity by crop type in San Luis Obispo County in 2015, including harvested acreage and total gross values.

Table 4.2-1
San Luis Obispo County
Comparative Agricultural Values

Year	Value
2005	$593,632,000
2006	$630,614,000
2007	$638,095,000
2008	$602,922,000
2009	$623,095,000
2010	$712,808,000
2011	$732,413,000
2012	$861,820,000
2013	$921,132,000
2014	$900,070,000
2015	$828,800,000

Source: San Luis Obispo County Department of Agriculture Weights and Measures, 2015.

Table 4.2-2
San Luis Obispo County Agricultural Summary

Crop Types	Harvested Acres	Total Gross Values
Animal Industry	N/A	$70,659,000
Field Crops	1,042,521	$15,600,000
Fruit and Nut Crops	52,369	$428,344,000
Vegetable Crops	27,340	$214,059,000
Nursery Products	N/A	$100,138,000
Total	**1,122,230**	**$828,800,000**

Source: San Luis Obispo County Department of Agriculture Weights and Measures, 2015.

The City of San Luis Obispo is an urban area of the County and by its nature, does not contain large-scale agricultural activities. These activities are typically found surrounding the City in unincorporated areas. The site is located in unincorporated San Luis Obispo County, but is completely surrounded by the corporate boundary of San Luis Obispo, and would be annexed to the City under the project. Because of the City's location within a rural and agricultural region, the City functions as an important location for agricultural commerce, both locally and beyond.

b. City Land in Agricultural Production. There are no large tracts of land in the City currently in commercial agricultural production with the exception of the SLO City Farm. The SLO City Farm occupies approximately 25 acres and is located off of U.S. Highway 101 (U.S. 101) and Calle Joaquin Road, southwest of and adjacent to the project site. The goal of SLO City Farm is to work with local farmers who will cultivate lands, provide demonstrations, and work in partnership with educational programs and facilities that will help sustain City agricultural production. The 131-acre project site is one of the largest pieces of productive agricultural land adjacent to the City and would be annexed to the City as part of the project.

c. San Luis Ranch Agricultural Resources.

Historical Agricultural Uses. Agricultural operations such as grain crop farming and small dairy operations on the San Luis Ranch project site date back to approximately 1900. In approximately 1921, the site was purchased by the Dalidio family and was converted to row crop farming of onion, artichoke, garbanzo beans, and flowers for seed. The Dalidio family continued row crop farming on the property throughout the 1900s and in the early 1980s their agricultural business became known as Zapata Farms. The Dalidio family sold the property in 2014, but the site has remained in use for row crop production.

Current Agricultural Uses. Approximately 109 acres of the 131-acre project site are currently used for the production of irrigated row crops including celery, broccoli, lettuce, Asian vegetables, and peas. A vegetable packing facility, storage areas, Prefumo Creek watershed drainages, and eucalyptus trees occupy about 22 acres that have little or no agricultural production value. The packing facility is used to process locally grown crops and the storage areas primarily store agricultural equipment. Crops grown on the site are packed in the field. On any given year various combinations of row crops may be grown on the site.

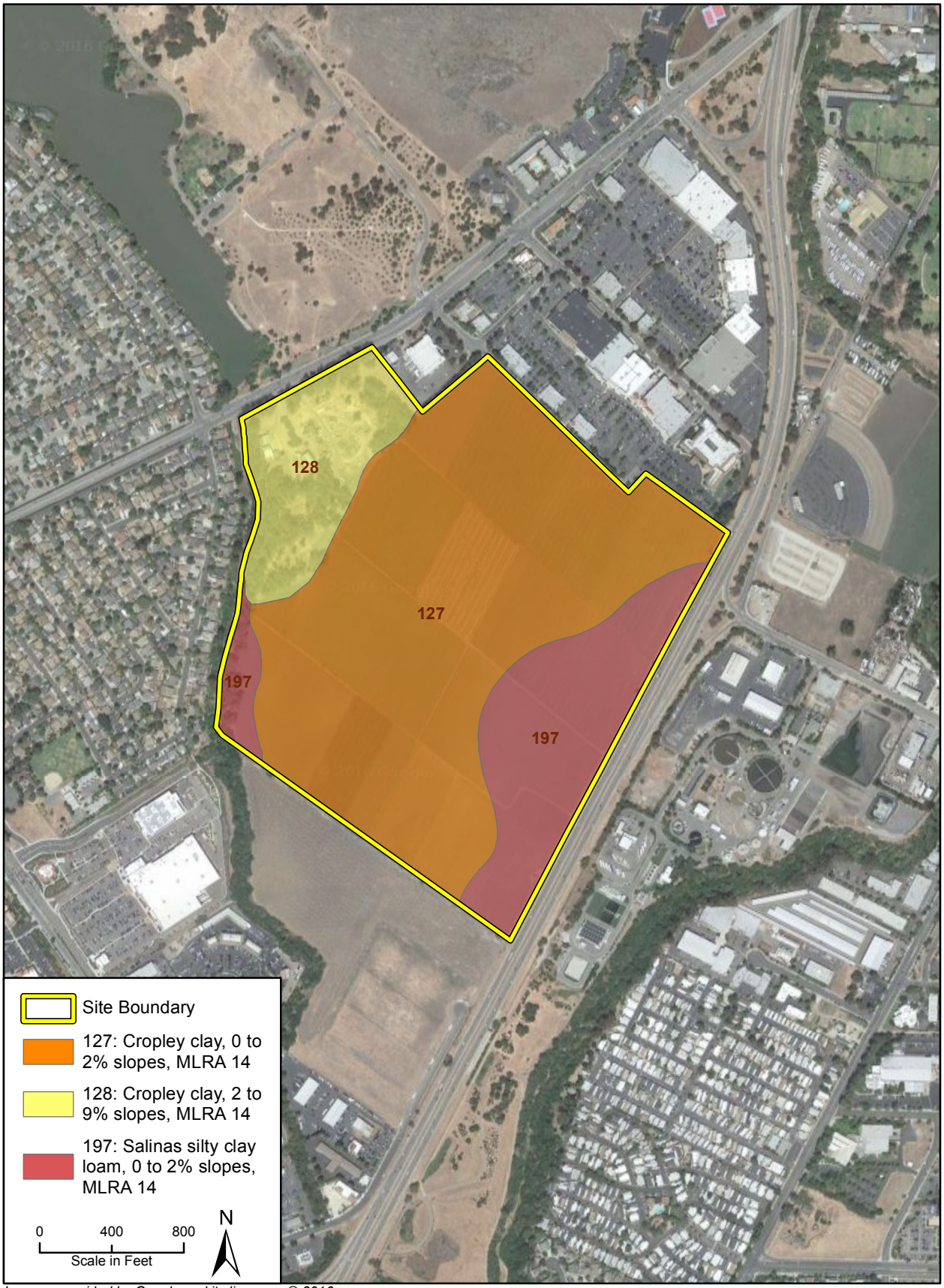
The current crop production areas are typically separated by at least 100- to 300-foot wide buffers from adjacent residential, commercial, and post office uses; however, these buffers were not planned and are not regulated by the City, but simply a coincidental separation from agricultural uses. Existing residential areas to the west are separated from the cropland by a riparian and eucalyptus corridor, a barbed wire fence, and a farm access road along Prefumo Creek. The shopping center and hotel north of the site are separated from the cropland area by a farm access road, Dalidio Drive, and a parking lot. The postal facility building to the northwest is separated from the cropland area by a farm access road, a drainage swale, and parking lot.

Soils and Crop Production. Two soils types are found on the project site: Cropley clay, which comprises about 83 acres in current agricultural production; and Salinas silty clay loam, which occupies about 26 acres of crop production land. Both soil types are designated as prime agricultural soils by the California Department of Conservation (DOC). Total irrigated crop production is about 109 acres. The soils meet criteria that further designate these areas as Prime Farmland by DOC Farmland Mapping and Monitoring Program (FMMP). Figure 4.2-1 shows the soil types on the project site. The FMMP is discussed further in Section 4.2.1(e).

The Cropley clay soil is constrained by seasonal wetness due to the slow surface runoff, which reduces the ability to farm when the ground is wet. The Salinas silty clay loam soil has no constraints related to crop production. The remaining three acres of Salinas silty clay loam are within the creek and bank area of Prefumo Creek and have limited agricultural production value. The 19 acres of Cropley clay that are presently used for the packing facility, storage areas, eucalyptus groves, and drainage areas, have little or no agricultural production value. Characteristics of the soil types found on the project site are described in Table 4.2-3. As shown in Table 4.2-3, 112 acres of the project site are Cropley clay with 0 to 2 percent slopes, and Salinas silty clay loam with 0 to 2 percent slopes, which may be categorized as Prime Farmland by the FMMP. As described above and shown in Table 4.2-3, the area described as Salinas silty clay loam with 0 to 2 percent slopes includes three acres within the creek and bank area of Prefumo Creek that have limited agricultural production value and are categorized as Other Lands. Therefore, approximately 109 acres of the project site meet the FMMP criteria for Prime Farmland (refer to in Section 4.2.1[e] for a detailed discussion of the FMMP and associated category criteria).

d. Soil Quality. The USDA's Natural Resources Conservation Service (NRCS) developed a system to generally classify soil types. The land capability classification describes soils types, their physical characteristics and limitations, and their suitability for agriculture and other uses. The NRCS groups soils according to their general suitability for most kinds of field crops. The capability class is designated by Roman numerals I through VIII. The numbers indicate progressively greater limitations and narrower choices for practical use:

- *Classes I and II* – Soils with few limitations that restrict their use for agriculture; almost all crops can be grown successfully on these soils.
- *Class III and IV* – Soils with agricultural limitations, which would affect management or choice of crop.
- *Class V* – There are no soils of Class V in the County.
- *Class VI and VII* – Soils that fall into these classes are suited primarily for rangeland.
- *Class VIII* – Soils and landforms that are unsuitable for agricultural use.



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Soil data provided by U.S. Department of Agriculture, Natural Resources Conservation Service SSURGO, 2014.

Soils on the Project Site Figure 4.2-1

Table 4.2-3
Project Site Soil Characteristics

Soil Name	Texture	Slope %	Capability Class	Storie Index	Site Area (acres)	Soil Constraints	Regional Cropland Uses	Site Agricultural Uses	FMMP Designation
Cropley	clay	0 to 2	II	60	83	wetness	row crops, pasture, dryland farming	row crops	Prime Farmland
Cropley	clay	2 to 9	II	54	19	wetness	dryland, hay/grain	packing, watershed	Urban and Built-up Land and Other Land
Salinas	silty clay loam	0 to 2	I	86	29	none	row crops, hay (26 acres) creek/bank of Prefumo Creek (3 acres)	row crops	Prime Farmland and Other Land

Source: USDA Web Soil Survey, 2015; Department of Conservation, 2014.

The project site soils and their associated acreages and capability classifications are shown in Table 4.2-~~1~~3 (only the irrigated capability class is shown because irrigation water is available and in active use at the site).

e. Farmland Mapping and Monitoring Program. The FMMP is implemented by the DOC's Division of Land Resource Protection, and recognizes the suitability of land for agricultural production. The FMMP is non-regulatory and was developed to inventory land and provide categorical definitions of Important Farmlands and consistent and impartial data to decision-makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. The program does not necessarily reflect local General Plan actions, urban needs, changing economic conditions, proximity to market, and other factors, which may be taken into consideration when government considers agricultural land use policies. FMMP produces Important Farmland Maps, which account for both resource quality (soils) and land use information. FMMP data is also released in the biennial California Farmland Conversion Report.

Designated categories of FMMP Important Farmland include the following:

- *Prime Farmland* has the most favorable combination of physical and chemical features, enabling it to sustain long-term production of agricultural crops. This land possesses the soil quality, growing season, and moisture supply needed to produce sustained high yields. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to National Resource Conservation Service (NRCS) mapping.
- *Farmland of Statewide Importance* possesses minor shortcomings when compared to Prime Farmland, such as greater slopes and/or less ability to store moisture. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to NRCS mapping.
- *Unique Farmland* is of lesser quality soils used for the production of the state's leading agricultural crops. Unique Farmland includes areas that do not meet the above stated criteria for Prime Farmland or Farmland of Statewide Importance, but that have been used for the production of specific high economic value crops during the two update cycles prior to the mapping date. It has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained high quality and/or high yields of a specific crop when treated and managed according to current farming methods.
- *Farmland of Local Importance* is important to the local agricultural economy, as determined by the County Board of Supervisors and a local advisory committee.
- *Grazing Land* contains existing vegetation that is suited to the grazing of livestock.
- *Urban and Built-up Land* is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
- *Other Land* is land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas

not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

According to Appendix G of the *State CEQA Guidelines*, Important Farmland includes Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. The best quality land is Prime Farmland. The remaining categories are used for reporting changes in land use as required for the FMMP biennial farmland conversion report. Figure 4.2-2, below, shows the FMMP designations within the project site. As shown therein, the majority of the project site (approximately 112 acres, or 85 percent) consists of Prime Farmland.

f. Agricultural Water Supply. Existing agricultural operations on the project site currently use water drawn from on-site wells from the underlying aquifer. As described in Section 2.0, *Project Description*, water for continuing agricultural operations under the project would continue to be supplied by the existing wells. Refer to Section 4.13, *Water Resources,* for further discussion of water resources available to supply the proposed on-site uses.

g. Regulatory Setting.

State.

Public Resources Code (PRC) Section 21060.1. PRC Section 21060.1 defines agricultural land for the purposes of assessing environmental impacts under the FMMP. As stated earlier, the FMMP inventories agricultural land use and land use changes throughout California.

Land Conservation Act (Williamson Act). Preservation of agricultural, recreational, and open space lands through agricultural preserve contracts between the County and property owners is a technique encouraged by the State to implement general plan policy. Agricultural preserve contracts are executed through procedures enabled by the California Land Conservation Act of 1965, also known as the Williamson Act. A contract may be entered into for property with agricultural, recreational, and open space uses in return for decreased property taxes. The County Agricultural Preserve Rules of Procedure require certain minimum parcel sizes and land use restrictions applicable to agricultural preserve lands under their respective contracts. The Rules of Procedure additionally outline agricultural and compatible uses for lands subject to land conservation contracts. Land Conservation Act contracts preserve agriculture and open space over a rolling term 10 year contract. The inclusion of a parcel in a Williamson Act contract is entirely voluntary and must have the consent of the property owner.

No lands within the project site or City of San Luis Obispo are enrolled in a Williamson Act contract (City of San Luis Obispo, 2014).

Local Agency Formation Commission. Local Agency Formation Commissions (LAFCos) are state agencies that were created in 1963 to help organize, manage, and regulate the provision of public services to development at the local level. San Luis Obispo LAFCo must approve any annexation or Sphere of Influence adjustment request made by the City, based on policies that discourage sprawl, preserve prime agriculture, and ensure the provision of public services.

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Additional data provided by Department of Conservation FMMP, 2015.

Important Farmland on the Project Site

Figure 4.2-2

LAFCo must consider the effect that any annexation proposal may produce on existing agricultural lands. By guiding development toward vacant urban land and away from agricultural land, LAFCo assists with the preservation of valuable agricultural resources. The Cortese-Knox-Hertzberg (CKH) Act of 2000, which provides LAFCo with its authority, strongly discourages the use of prime agriculture land for development. In 2008 San Luis Obispo LAFCo adopted Agricultural Goals-Policies-Guidelines developed to help preserve agricultural resources. LAFCo Agricultural Policy 12 applies to projects that propose annexation of land containing prime agricultural soils. This policy requires that such projects include mitigation requiring a substitution ratio of at least 1:1 for the prime land to be converted from agricultural use.

Local.

County of San Luis Obispo General Plan Agriculture Element. Although not binding relative to the City of San Luis Obispo, the County's Agriculture Element includes policies and programs that may affect the City's ability to annex and develop unincorporated lands that may either be designated as Agriculture, contain prime soils, or be in agricultural production. LAFCo will also consider these policies when considering any annexation request, or adjustment to the City's existing Sphere of Influence. The following policies are most relevant in this regard.

Note that while County policies AGP22 and AGP23 apply to development in the County (and not the City), they have the potential to allow higher density clustered development adjacent to the City, which could be considered potentially inconsistent with the City's policies with respect to maintaining a hard urban edge. For this reason, these policies are described below.

Policy AG2. Conserve agricultural resources.

a. Maintain the agricultural land base of the county by clearly defining and identifying productive agricultural lands for long-term protection.
b. Conserve the soil and water that are the vital components necessary for a successful agricultural industry in this county.
c. Establish land-use policies in this element that support the needs of agriculture without impeding its long-term viability.

Policy AG3. Protect Agricultural Lands.

a. Establish criteria in this element for agricultural land divisions that will promote the long-term viability of agriculture.
b. Maintain and protect agricultural lands from inappropriate conversion to non-agricultural uses. Establish criteria in this element and corresponding changes in the Land Use Element and Land Use Ordinance for when it is appropriate to convert land from agricultural to non-agricultural designations.

Policy AGP24. Conversion of Agricultural Land.

a. Discourage the conversion of agricultural lands to non-agricultural uses through the following actions:

1. *Work in cooperation with the incorporated cities, service districts, school districts, the County Department of Agriculture, the Agricultural Advisory Liaison Board, Farm Bureau, and affected community advisory groups to establish urban service and urban reserve lines and village reserve lines that will protect agricultural land and will stabilize agriculture at the urban fringe.*
2. *Establish clear criteria in this plan and the Land Use Element for changing the designation of land from Agriculture to non-agricultural designations.*
3. *Avoid land redesignation (rezoning) that would create new rural residential development outside the urban and village reserve lines.*
4. *Avoid locating new public facilities outside urban and village reserve lines unless they serve a rural function or there is no feasible alternative location within the urban and village reserve lines.*

City of San Luis Obispo General Plan. The City of San Luis Obispo addresses agricultural uses and compatibility with urban development through implementation of adopted policies and programs in the General Plan Land Use Element and Conservation and Open Space Element. The current General Plan policies and programs seek to maintain agricultural resources within and outside of the urban reserve line. Policies protect prime agricultural land by maintaining a strict urban growth boundary and promotion of compact residential clusters in agricultural land outside the City limits. The City has a designated Greenbelt, which is an important tool for open space protection in the City. The City seeks to maintain the greenbelt by way of agricultural easements or acquisition land around the urban reserve line. The project site does not fall within the City's designated greenbelt.

Land Use Element. The following policies included in the Land Use Element define the local regulatory setting relative to agricultural resources on the project site:

Policy 1.7.1. Urban Reserve*. The City shall maintain an urban reserve line containing the area around the City where urban development might occur.*

Policy 1.7.3. Interim Uses*. Expansion areas should be kept in agriculture, compatible with agricultural support services or open-space uses until urban development occurs, unless a City-approved specific plan provides for other interim uses.*

Policy 1.8.1. Open Space Protection. *Within the City's planning area and outside the urban reserve line, undeveloped land should be kept open. Prime agricultural land, productive agricultural land, and potentially productive agricultural land shall be protected for farming. Scenic lands, sensitive wildlife habitat, and undeveloped prime agricultural land shall be permanently protected as open space.*

Policy 1.9.1. Agricultural Protection*. The City shall support preservation of economically viable agricultural operations and land within the urban reserve and City limits. The City should provide for the continuation of farming through steps such as provision of appropriate general plan designations and zoning.*

Policy 1.9.2. Prime Agricultural Land*. The City may allow development on prime agricultural land if the development contributes to the protection of agricultural land in the urban reserve or greenbelt by one or more of the following methods, or an equally effective method: acting as a receiver site for transfer of development credit from prime agricultural land of equal quantity; securing for the City or for*

a suitable land conservation organization open space or agricultural easements or fee ownership with deed restrictions; helping to directly fund the acquisition of fee ownership or open space easements by the City or a suitable land conservation organization. Development of small parcels which are essentially surrounded by urbanization need not contribute to agricultural land protection.

***Policy 1.10.3. Public Access**. Areas preserved for open space should include public trail access, controlled to protect the natural resources, to assure reasonable security and privacy of dwellings, and to allow continuing agricultural operations. Public access through production agricultural land will not be considered, unless the owner agrees.*

***Policy 1.10.4. Design Standards**. The City shall require cluster development to:*

- ***A*** *Be screened from public views by land forms or vegetation, but not at the expense of habitat. If the visually screened locations contain sensitive habitats or unique resources as defined in the Conservation and Open Space Element, development should be avoided in those areas and instead designed to cluster in the form of vernacular farm building complexes, to blend into the traditional agricultural working landscape.*
- ***B*** *Be located on other than prime agricultural land and be situated to allow continued agricultural use.*
- ***C*** *Prohibit building sites and roads within stream corridors and other wetlands, on ridge lines, rock outcrops, or visually prominent or steep hillsides, or other sensitive habitats or unique resources as defined in the Conservation and Open Space Element.*
- ***D*** *Preserve historic or archeological resources.*

***Policy 1.13.8. Open Space**. Future development on the San Luis Ranch property shall dedicate one half of the total land or easements for open space use.*

***Policy 8.1.4. SP-2, San Luis Ranch (Dalidio) Specific Plan Area**. Purpose: This project site should be developed as a mixed use project that maintains the agricultural heritage of the site, provides a commercial/office transition to the existing commercial center to the north, and provides a diverse housing experience. Protection of the adjacent creek and a well-planned integration into the existing circulation system will be required.*

The specific plan for this area should consider and address the following land use and design issues.

- ***A*** *Provide land and appropriate financial support for development of a Prado Road connection. Appropriate land to support road infrastructure identified in the Final Project EIR (overpass or interchange) at this location shall be dedicated as part of any proposal and any area in excess of the project's fair share of this facility shall not be included as part of the project site area used to calculate the required 50% open space.*
- ***B*** *Circulation connections to integrate property with surrounding circulation network for all modes of travel.*
- ***C*** *Connection to Froom Ranch and Calle Joaquin, if proposed, shall not bifurcate on- site or neighboring agricultural lands. Any connection to Calle Joaquin shall be principally a secondary / emergency access by design.*
- ***D*** *Development shall include a transit hub. Developer shall work with transit officials to provide express connections to Downtown area.*
- ***E*** *Maintain agricultural views along Highway 101 by maintaining active agricultural uses on the site, and maintain viewshed of Bishop Peak and Cerro San Luis.*

F *Maintain significant agricultural and open space resources on site (see Policy 1.13.8.B). Land dedicated to Agriculture shall be of size, location and configuration appropriate to maintain a viable, working agricultural operation.*

G *Where buffering or transitions to agricultural uses are needed to support viability of the agricultural use, these shall be provided on lands not counted towards the minimum size for the agriculture / open space component. Provide appropriate transition to agricultural uses on-site.*

H *Integrate agricultural open space with adjacent SLO City Farm and development on property.*

I *Site should include walkable retail and pedestrian and bicycle connections to surrounding commercial and residential areas.*

J *Commercial and office uses shall have parking placed behind and to side of buildings so as to not be a prominent feature.*

K *Neighborhood Commercial uses for proposed residential development shall be provided.*

L *Potential flooding issues along Prefumo Creek need to be studied and addressed without impacting off-site uses.*

M *All land uses proposed shall be in keeping with safety parameters described in this General Plan or other applicable regulations relative to the San Luis Obispo Regional Airport.*

N *Historic evaluation of the existing farm house and associated structures shall be included.*

Conservation and Open Space Element. The Conservation and Open Space Element includes policies designed to protect agricultural resources and prime agricultural land, as well as offset the development of agricultural areas. The following policies influence the local regulatory setting relative to project agricultural resources:

Policy 8.2.1. Open Space Preserved*. The City will preserve as open space or agriculture the undeveloped and agricultural land outside the urban reserve line, including the designated Greenbelt as shown in Figure 5 [of the Conservation and Open Space Element], and will encourage individuals, organizations and other agencies to do likewise.*

Policy 8.2.2. Goal: Open space within the urban area [Relevant Portion]*. Within the urban area, the City will secure and maintain a diverse network of open land encompassing particularly valuable natural and agricultural resources, connected with the landscape around the urban area. Particularly valuable resources include:*

- *Undeveloped land within the Urban Reserve not intended for urban uses.*
- *Prime agricultural soils and economically viable farmland.*

Policy 8.3.2. Open Space Buffers. [Relevant Portion]. *When activities close to open space resources within or outside the urban area could harm them, the City will require buffers between the activities and the resources. The City will actively encourage individuals, organizations and other agencies to follow this policy. Buffers associated with new development shall be on the site of the development, rather than on neighboring land containing the open space resource. Buffers provide distance in the form of setbacks, within which certain features or activities are not allowed or conditionally allowed. Buffers shall also use techniques such as planting and wildlife-compatible fencing. Buffers shall be adequate for the most sensitive species in the protected area, as determined by a qualified professional and shall complement the protected area's habitat values.*

Buffers shall be required in the following situations:

- *Between urban development and agricultural operations, to address dust, noise, odors, chemical use, and access by people and pets.*
- *Between agricultural operations and natural habitat, to address noise, chemical use, sediment transport, and livestock access.*

Policy 8.5.1. Public Access*. Public access to open space resources, with interpretive information, should be provided when doing so is consistent with protection of the resources, and with the security and privacy of affected landowners and occupants. Access will generally be limited to non-vehicular movement, and may be visually or physically restricted in sensitive areas. Public access to or through production agricultural land, or through developed residential lots, will be considered only if the owner agrees. The City shall also designate open space areas that are not intended for human presence or activity.*

Policy 8.6.3. Required Mitigation. [Relevant Portion]. *Loss or harm shall be mitigated to the maximum extent feasible. Mitigation must at least comply with Federal and State requirements. Mitigation shall be implemented and monitored in compliance with State and Federal requirements, by qualified professionals, and shall be funded by the project applicant.*

- *For a widespread habitat type or for farmland, mitigation shall consist of permanently protecting an equal area of equal quality, which does not already have permanent protection, within the San Luis Obispo Planning Area.*

4.2.2 Previous Program-Level Environmental Review

The 2014 Land Use and Circulation Elements Update Environmental Impact Report (LUCE Update EIR) previously analyzed agricultural impacts of development planned under the General Plan Land Use and Circulation Elements, including planned development on the project site. The LUCE Update EIR noted that the project site is currently in use for the production of irrigated row crops. The LUCE Update EIR also noted that the 109 acres of irrigated row crops on the site are considered prime agricultural land, although the project site is not currently under a Williamson Act or agricultural preserve contract. The LUCE Update EIR identified significant impacts to agricultural resources due to the conversion of prime farmland from development of the project site. However, the EIR concluded that implementation of the updated General Plan policies and amendments to existing City policies would reduce impacts to a less than significant level. In particular, the LUCE Update EIR incorporated program-level Mitigation Measure AG-1, which amended Land Use Element Policy 1.8.1, Open Space Protection to state that "productive agricultural land shall be protected for farming." The LUCE Update EIR also incorporates Conservation and Open Space Element Policy 8.6.3, which requires the loss of agricultural land to be mitigated to the maximum extent feasible (City of San Luis Obispo 2014).

4.2.3 Impact Analysis

a. Methodology and Significance Thresholds. The following thresholds are based on the City's Initial Study and Appendix G of the State CEQA Guidelines. Impacts would be significant if the San Luis Ranch Project would result in any of the following:

1. *Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;*
2 *Conflict with existing zoning for agricultural use or a Williamson Act contract;*
3 *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));*
4 *Result in the loss of forest land or conversion of forest land to non-forest use; and/or*
5 *Result in changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.*

The project Initial Study (refer to Appendix A) determined that the project would not conflict with a Williamson Act Contract. See Section 4.14, *Issues Addressed in the Initial Study*, for a discussion of this issue. In addition, the project site does not contain any designated forest land, timberland, or timberland zoned Timberland Production. Therefore, the project would not conflict with zoning for these resources and would not result in the loss or conversion of forest land. Impacts would be less than significant and Thresholds 3 and 4 are not discussed further herein.

This analysis builds upon the conclusions identified in the LUCE Update EIR. The LUCE Update EIR analyzed the potential for development of the San Luis Ranch Specific Plan area to convert agricultural resources to developed uses, and concluded that impacts would be less than significant with the incorporation of program-level mitigation measures, including dedication of off-site agricultural lands or in-lieu fees (consistent with Land Use Element Policies 1.8.1 and 1.9.2 and Conservation and Open Space Element Policy 8.6.3).

To evaluate the significance of impacts from the conversion of farmland to non-agricultural use, this analysis relies on the acreages of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance mapped by the FMMP.

In addition, this analysis uses the California Agricultural Land Evaluation and Site Assessment (LESA) Model as a basis to help determine if the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses would create significant agricultural resource impacts. The LESA Model was developed as an amendment to Appendix G of the *State CEQA Guidelines* concerning agricultural lands. It is intended "to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process" (Public Resources Code Section 21095). LESA is a method used to define an approach for rating the relative quality of land resources based upon specific measurable features. The LESA Model is composed of six different factors: two Land Evaluation (LE) factors are based upon measures of soil resource quality, and four Site Assessment (SA)

factors provide measures of a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. The factors are then weighted relative to one another and combined, resulting in a single project score that becomes the basis for making a determination of a project's potential significance, based upon a range of established scoring thresholds.

- If the total LESA score is from 0 to 39 points, the scoring decision is "not considered significant."
- If the score is from 40 to 59 points, it is "considered significant only if LE and SA subscores are each greater than or equal to 20 points."
- If the score is from 60 to 79 points, it is "considered significant unless either LE or SA subscore is less than 20 points."
- If the score is from 80 to 100 points, it is "considered significant" (California Department of Conservation 1997).

The methodologies for analyzing the project's potential impacts to agricultural resources are based on the guidelines, policies, and procedures identified in the City's General Plan, the FMMP, and the California Agricultural LESA Model. The California Department of Conservation provided mapping data used to assess project site soil characteristics. FMMP data utilized for the LESA Model are dated 2014. As the project site is not under Williamson Act contract, the project would not conflict with a Williamson Act contract.

b. Impacts and Mitigation Measures.

Threshold 1:	*Would the project result in conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

Impact AG-1 The project would result in the direct conversion of ~~59.3~~ 56 acres of Prime Farmland, as mapped by the FMMP, to non-agricultural uses. Therefore, impacts would be Class II, *significant but mitigable.*

Approximately 109 acres of the 131-acre project site are currently used for the production of irrigated row crops including celery, broccoli, lettuce, Asian vegetables, and peas. As shown in Figure 4.2-2 and Table 4.2-3, the project site contains ~~112~~ 109 acres of Prime Farmland, as designated by the FMMP, with 109 acres in agricultural production. This Prime Farmland comprises approximately ~~83~~ 85 percent of the site, with non-Prime Farmland located along the western and northwestern fringes of the site. The project would preserve approximately ~~52.7~~ 53 acres in agriculture adjacent the San Luis Obispo City Farm and along the project site frontage with U.S. 101, all of which is designated Prime Farmland. The remaining agricultural area represents ~~(~~approximately ~~40.7~~ 43 percent~~)~~ of the net site acreage and 40 percent of the gross site acreage ~~(when major roadways and right of way for the Prado Road interchange are discounted) in agriculture, primarily adjacent the San Luis Obispo City Farm and along the project site frontage with U.S. 101, all of which is designated Prime Farmland~~. Approximately ~~59.3~~ 56 acres of on-site Prime Farmland would be converted to non-agricultural use.

Table 4.2-4 summarizes the LESA Model score for the project site.

Table 4.2-4
LESA Analysis Summary for Project Site

	Factor Rating (0-100 points)	Factor Weighting (Total = 1.00)	Weighted Factor Rating
Land Evaluation (LE)			
1. Land Capability Classification	92.1	0.25	23.1
2. Storie Index Rating	64.9	0.25	16.2
Site Assessment (SA)			
1. Project Size	100	0.15	15.0
2. Water Resource Availability	83	0.15	12.5
3. Surrounding Agricultural Lands	0	0.15	0.0
4. Protected Resource Lands	0	0.05	0.0
Total LESA Score (sum of weighted factor ratings)			**66.8**
Significance Determination	**Significant** (because both LE and SA sub-scores are each greater than 20 points).		

See Appendix C for complete LESA Model Worksheets for the project site.

Utilizing the FMMP map and NRCS soil map, the estimated LESA score for the project site was found to be 66.8 (see Appendix C for complete LESA Model worksheets). This score indicates that agricultural resources within the project site are significant because both the LE and SA scores are each greater than 20 points. The reason for the resulting sub-score is that the project site is a relatively large site, contains soils with Prime Farmland designations, and includes onsite wells that serve as a reliable water source for irrigation.

Because the project would convert Prime Farmland to non-agricultural use on a site with a LESA Model score which indicates that the agricultural resources within the site are significant, this impact would be potentially significant. As a result, the project would potentially conflict with Land Use Element Policy 1.8.1, which states that prime agricultural land, productive agricultural land, and potentially productive agricultural land shall be protected for farming (refer to Section 4.9, *Land Use*, for a detailed discussion of the project's consistency with applicable General Plan policies).

Mitigative Components of the Specific Plan and Impact Conclusion. San Luis Ranch Specific Plan Goal 2 establishes a goal to provide a community that maintains and promotes the land's agricultural heritage. San Luis Ranch Specific Plan Policy 2.4, which requires strict monitoring of the conversion of active agriculture to non-agricultural uses and consider the possible effects of new development on character of the community as a whole, is intended to help achieve Specific Plan Goal 2. Nevertheless, the project would convert Prime Farmland to non-agricultural use, resulting in potential conflict with Land Use Element Policy 1.8.1. However, Land Use Element Policy 1.9.2 allows development on prime agricultural land if the development contributes to the protection of agricultural land. In addition, Conservation and Open Space Element Policy 8.6.3 would require the applicant to permanently protect land of equal area and quality which does not already have permanent protection (through an

agricultural conservation easement or in-lieu fees to a fund dedicated to acquiring and preserving agricultural land).

The project also includes a commitment, to be included in the Development Agreement, to procure an off-site agricultural conservation easement/deed restriction to comply with ~~the~~ Land Use Element Policy 8.1.4.f, which requires that future development on the San Luis Ranch property dedicate one half of the total land or easements for open space use, and that land dedicated to agriculture shall be of size, location and configuration appropriate to maintain a viable, working agricultural operation. Land Use Element Policy 8.1.4 includes a performance standards table, which states that "a substantial multiplier for the amount of open space is provided for the off-site property exchanged to meet the on-site requirement." The project applicant has an existing option-to-purchase agreement on a parcel located within the City's Greenbelt, and the City has provided the applicant with preliminary approval for this site as an off-site agricultural conservation easement/deed restriction to satisfy Land Use Element Policy 8.1.4.f. However, the specific location of potential off-site agricultural conservation easement land has not been formally identified through a final approval. The "substantial multiplier" required by the City for the San Luis Ranch Specific Plan would be determined by the City at the time that final approval for off-site property exchanged to meet the on-site requirement is considered. To ensure that the final off-site agricultural conservation easement/deed restriction satisfies the requirements of Land Use Element Policy 8.1.4, the project applicant would be required to establish performance measures for the off-site agricultural conservation easement/deed restriction. Therefore, impacts associated with the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), pursuant to the FMMP, to non-agricultural use are identified as potentially significant.

Mitigation Measures. The following mitigation measures would be required to ensure that impacts associated with the conversion of Prime Farmland are mitigated to the maximum extent feasible:

AG-1 **Agricultural Conservation.** Prior to issuance of any grading permits, the project proponent shall provide that for every one (1) acre of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) on the site that is permanently converted to non-agricultural use as a result of project development, one (1) acre of land of comparable agricultural productivity shall be preserved in perpetuity. The land dedicated to agriculture pursuant to this measure shall be of size, location and configuration appropriate to maintain a viable, working agricultural operation. The acreage required to meet the 1:1 ratio may be met by the off-site agricultural conservation easement/deed restriction proposed by the project applicant, as long as this land meets the conditions outlined in this measure. Said mitigation shall be satisfied by the applicant through:

1) Granting a perpetual conservation easement(s), deed restriction(s), or other farmland conservation mechanism(s) to the City or qualifying entity which has been approved by the

City, such as the Land Conservancy of San Luis Obispo, for the purpose of permanently preserving agricultural land. The required easement(s) area or deed restriction(s) shall therefore total a minimum of ~~59.3~~ 56 acres of Prime Farmland. The land covered by said on- and/or off-site easement(s) or deed restriction(s) shall be located within or contiguous to the City's Urban Reserve Line or Greenbelt subject to review and approval of the City's Natural Resources Manager; or

2) Making an in-lieu payment to a qualifying entity which has been approved by the City, such as the Land Conservancy of San Luis Obispo, to be applied toward the future purchase of a minimum of ~~59.3~~ 56 acres of Prime Farmland in San Luis Obispo County, together with an endowment amount as may be required. The payment amount shall be determined by the qualifying entity or a licensed appraiser; or
3) Making an in-lieu payment to a qualifying entity which has been approved by the City and that is organized for conservation purposes, to be applied toward a future perpetual conservation easement, deed restriction, or other farmland conservation mechanism to preserve a minimum of ~~59.3~~ 56 acres of Prime Farmland in San Luis Obispo County. The amount of the payment shall be determined by the qualifying entity or a licensed appraiser; or
4) Any combination of the above.

Prior to issuance of any grading permits for the project, the applicant shall provide evidence of the recorded easement(s), deed restriction(s), or evidence of payment to the City Planning Department or qualifying entity for approval to demonstrate compliance with this measure.

Plan Requirements and Timing**.** Notices, payment of in-lieu fees, and/or dedication of agricultural conservation easements shall be completed by the applicant prior to development plan approval.

Monitoring**.** The City shall ensure compliance with Land Use Element Policy 8.6.3. The City shall make the final decision on the specific requirements for agricultural mitigation prior to development plan approval.

Residual Impacts. Mitigation Measure AG-1 would reduce the impacts associated with the conversion of Prime Farmland consistent with the intent of Land Use Element Policy 1.9.2. In addition, Mitigation Measure AG-1 would require a minimum of ~~59.3~~ 56 acres of land of comparable agricultural productivity to be preserved in perpetuity on- or off-site to satisfy the requirement of Mitigation Measure AG-1 that impacts to Prime Farmland be mitigated at a 1:1 ratio (acres of Prime Farmland converted to acres of Prime Farmland preserved in perpetuity).

In addition, pursuant to the Land Use Element Policy 1.13.8, which requires that 50% of the project site's acreage be retained in agricultural and/or open space uses, preservation of ~~59.3~~ 56 acres of Prime Farmland ~~offsite~~ as required by Mitigation Measure AG-1 would result in a minimum of 3 acres of Prime Farmland required to be preserved off-site (56 total acres required to be preserved minus 53 acres proposed to be preserved on-site) ~~mitigation ratio of approximately 10:1 (acres preserved off-site to acres required on-site), which would appear to satisfy the intent of the "substantial multiplier" clause. However the final determination of the project's consistency with City policy rests with City Council~~. Therefore, for the purposes of CEQA, implementation of Mitigation Measure AG-1 would ensure that the project would be potentially consistent with the intent of Land Use Element Policy 8.1.4.f and 1.13.8, as well as Conservation and Open Space Element Policy 8.6.3 (refer to Section 4.9, *Land Use/Policy Consistency*, for a detailed discussion of the project's consistency with applicable City policies). However, the final determination of the project's consistency with City policy, including the degree to which the project satisfies the "substantial multiplier" clause, rests with City Council. Therefore, with implementation of Mitigation Measure AG-1, this impact would be reduced to a less than significant level.

Threshold 2:	*Would the project conflict with existing zoning for agricultural use?*

Impact AG-2 The project would alter the existing land use and zoning on the project site. However, these alterations would be consistent with the General Plan's identification of the San Luis Ranch Specific Plan for a mix of urban, agricultural, and open space use. Therefore, this impact would be Class III, *less than significant*.

The 131-acre project site is an unincorporated area completely surrounded by the City of San Luis Obispo, and is within the City's Sphere of Influence. Under the County's jurisdiction, the project site has a Multi-Land Use category with Flood Hazard and Airport Review Area (AR) combining designation overlays. Refer to Section 2.0, *Project Description*, for a detailed discussion of the pre-zoning and annexation required for the project. Under the City's General Plan, the project site has a land use designation of San Luis Ranch Specific Plan and is intended for the future adoption of a specific plan. Land Use Element Policy 8.1.4 provides requirements and guidance for the future development of a mixed-use project on the San Luis Ranch property that maintains the agricultural heritage of the site. The City's Zoning Regulations, which implement the General Plan, do not currently apply to the project site because it is currently outside of the incorporated City. No zoning districts in the City have been designated for the project site.

Mitigative Components of the Specific Plan and Impact Conclusion. San Luis Ranch Specific Plan Goal 1 establishes a goal to provide a mixed-use development that fosters a sense of community. San Luis Ranch Specific Plan Policy 1.1, which requires that the Specific Plan support multiple land uses that work to enhance the surrounding residential, open space, agriculture, and commercial uses, is intended to help achieve this goal. The Specific Plan area would be annexed to the City of San Luis Obispo as part of the project, and would be rezoned consistent with the associated land use plan included in the Specific Plan. Future development of the site would be consistent with the underlying zoning. Approximately 109 acres of the 131-acre site are currently used for irrigated row crop production. The project would result in a mix

of residential and commercial development on the site and preservation of approximately 52.7 acres for agricultural purposes. Therefore, the Specific Plan would be consistent with the intended uses of the site and would not conflict with existing zoning. This impact would be less than significant.

Mitigation Measures. No mitigation measure would be required.

Residual Impacts. Impacts would be less than significant without mitigation.

Threshold 5:	*Would the project result in changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

Impact AG-3 The project would include development of commercial and residential uses adjacent to agricultural uses on the project site. This may result in conflict with existing or future urban and agricultural zoning and uses and adversely affect the long-term viability of the remaining agricultural uses onsite and at the adjacent SLO City Farm. However, with implementation of agricultural buffers, and compliance with standard SLOAPCD dust control measures and City policies, this impact would be Class II, *significant but mitigable*.

Approximately 109 acres of the 131-acre site are currently used for irrigated row crop production. The project site is generally bounded by residential uses and Madonna Road to the west, commercial uses and Dalidio Drive to the north, U.S. 101 to the east, and the San Luis Obispo City Farm to the south. Prefumo Creek is located west of the site. As development occurs on the project site, conflicts could occur between continuing on-site agricultural operations and existing and future adjacent non-agricultural uses. Typical land use conflicts between active agricultural operations and other land uses are described below.

Short-Term Conflicts with Agricultural Uses. As described in Section 2.0, *Project Description*, the project would be constructed in six phases, resulting in a construction period that may last for up to six years. Each phase of construction would require extensive earthwork, which would result in fugitive dust that could impact on-site and off-site crops and other agricultural activities. Implementation of standard dust control measures required by the San Luis Obispo Air Pollution Control District (SLOAPCD), such as watering dirt to dampen and prevent or alleviate dust nuisance and covering stockpiles to prevent dust leaving the site, during each phase would ensure adjacent agricultural operations are not impacted by ongoing construction. Section 4.3, *Air Quality*, describes standard dust control measures required by SLOAPCD that would be applicable during project construction and would incrementally reduce potential impacts to the productivity of on-site and neighboring agricultural uses. Compliance with standard SLOAPCD dust control measures and City policies to provide buffers between urban and agricultural uses on the project site would ensure that impacts from short-term conflicts with agricultural uses during project construction would remain less than significant.

Earthwork during project construction would also require stockpiling of soil on-site, as areas of the site are graded to their final elevations. Potential impacts associated with siltation into local streams during construction activities are described in Section 4.8, *Hydrology and Water Quality*.

Long-Term Conflicts with Agricultural Uses. Urban development adjacent to farmland can create conflicts with agricultural operations in adjacent areas. The increase in the number of residents in the area and new accessible pathways, bike paths, and roadways would increase public access near existing agricultural areas, increasing the potential for conflicts, such as vandalism to farm equipment or fencing, and theft of crops at on-site agricultural lands and the adjacent SLO City Farm. These effects can result in direct economic impacts to agricultural operations, potentially impacting the overall economic viability of continued agricultural operations.

Long-Term Conflicts with Residential and Commercial Uses. Development of the project would add an estimated 1,293 residents to the City (546 new single family and multi-family dwelling units x 2.29 people/unit and 34 new affordable units x 1.25 people/unit)[1] near lands under agricultural cultivation. Residents living adjacent to agricultural operations commonly cite odor nuisance impacts, noise from farm equipment, dust, and pesticide spraying as typical sources of conflict. Conservation and Open Space Element Policy 8.3.2, Open Space Buffers, requires that buffers be placed between urban development and agricultural operations. In compliance with the City's Open Space Buffers policy, the project would include a 72-foot buffer between agricultural operations and urban development to reduce and/ or avoid noise, dust, light impacts, odors, chemical use, access by people and pets, pilferage, and pesticide drift to new residential and commercial land uses on the project site. The 72-foot buffers allow for 60 feet of multimodal right-of-way beyond 12-foot residential rear yard space. The prevailing winds in the region are generally from the northwest, directing agricultural dust away from adjacent residential areas when wind blows from that direction. Compliance with Conservation and Open Space Element Policy 8.3.2 would ensure that land use conflicts between agriculture and adjacent residential and commercial land would be minimized.

Mitigative Components of the Specific Plan and Impact Conclusion. San Luis Ranch Specific Plan Goal 2 establishes a goal to provide a community that maintains and promotes the land's agricultural heritage. San Luis Ranch Specific Plan Policy 2.1 requires that the Specific Plan encourage open space and agricultural uses that support a green buffer surrounding residential and commercial neighborhoods in the Specific Plan area. Specific Plan Policy 2.4 requires strict monitoring of the conversion of active agriculture to non-agricultural uses and considers the possible effects of new development on character of the community as a whole. Specific Plan Policy 2.7 requires incorporation of appropriate agricultural uses in public places and neighborhoods. These policies are intended to help achieve Specific Plan Goal 2. Compliance with Conservation and Open Space Element Policy 8.3.2 would ensure that land use conflicts between agriculture and adjacent residential and commercial land would be minimized. As described above, the Specific Plan includes a 72-foot buffer between agricultural operations and urban development to reduce and/ or avoid noise, dust, light impacts, odors, chemical use,

[1] Population growth rate from City's Land Use and Circulation Element Appendix I Water Supply Assessment (page 9), as referred to in SB610 Water Supply Assessment – San Luis Ranch prepared by Cannon (2016; Appendix M).

access by people and pets, pilferage, and pesticide drift to new residential and commercial land uses on the project site. The proposed agricultural buffer includes berm and bioswale configurations limits on production hours and machinery use for adjacent agricultural operations. In addition, the Specific Plan proposes that on-site agricultural operations would ~~include~~ transition to organic farming, which would not involve pesticide or chemical fertilizer use on the site. However, the increase in the number of residents in the area and new accessible pathways, bike paths, and roadways would increase the potential for conflicts at on-site agricultural lands and the adjacent SLO City Farm which can result in direct economic impacts to agricultural operations, potentially impacting the overall economic viability of continued agricultural operations. Therefore, impacts associated with conversion of Farmland to non-agricultural use would be potentially significant.

Mitigation Measures. The following mitigation measure would be required.

AG-3(a) **Agricultural Conflict Avoidance Measures.** The following language shall be added to Section 4.2.1, *Agricultural Buffer*, of the San Luis Ranch Specific Plan:

> *Agricultural buffers will include City-approved measures to reduce availability of public access to agricultural cultivation areas adjacent to the project site (e.g., fencing, signs, etc.). Future residents will be notified of agricultural buffers as part of purchase or lease agreements.*

AG-3(b) **Agricultural Fencing.** The project applicant shall coordinate with the City to fund installation of fencing and signs along Froom Ranch Way and Dalidio Drive/Prado Road to minimize potential for increases in trespass and vandalism of adjacent agricultural areas.

AG-3(c) **Buffer Landscaping.** To reduce the potential for noise, dust, and pesticide drift to affect future residents on the project site, the project applicant shall ensure that project landscape plans include planting of a windrow of trees and shrubs within the agricultural buffer along Froom Ranch Way at a sufficient density to buffer the site from surrounding agricultural operations.

Plan Requirements and Timing. The applicant shall clearly identify measures such as fencing, landscaping, etc. within the development plan and tract map.

Monitoring. The City Natural Resources Manager shall make the final decision on the specific requirements for agricultural conflict avoidance measures prior to development plan approval for the project, and shall ensure that agricultural conflict avoidance measures are implemented in compliance with applicable General Plan policies.

The City Natural Resources Manager shall review the development plan and VTTM to ensure that design includes installation of fencing and signs as required under Mitigation Measures AG-3(b) and AG-

3(c). The City Natural Resources Manager shall also review the final landscape plan to ensure that the species mix and density of proposed plantings would provide an adequate landscape buffer. Field inspections at appropriate phases of project construction shall confirm installation and compliance with Mitigation Measures AG-3(b) and AG-3(c).

Residual Impacts. Impacts associated with potential long-term conflicts with agricultural uses would be less than significant levels with implementation of Mitigation Measures AG-3(a) through AG-3(c). Agricultural fencing would not interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors within the Specific Plan Area (for a detailed discussion of potential project impacts to wildlife movement, refer to Impact BIO-4 in Section 4.4, *Biological Resources*).

Threshold 5:	*Would the project result in changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

Impact AG-4 Re-grading of the project site would not result in significant degradation of viability of on-site agricultural land. Therefore, this impact would be Class III, *less than significant*.

The project site is relatively level, with a gentle slope to the south and southwest. Two soils types are found on the project site: Cropley clay, which comprises about 83 acres in current agricultural production; and Salinas silty clay loam, which occupies about 26 acres of crop production land (refer to Figure 4.2-1). As described above, both soil types are designated as prime agricultural soils by DOC, and both soils meet criteria that designate these areas as Prime Farmland by the FMMP. The proposed grading and drainage plan for the site would require grading of topsoils to offset the diverted flows from adjacent areas, such that no change in flood water depths or flows would occur on surrounding properties. Grading in the Agricultural Heritage Facilities & Learning Center area would include the placement of fill to protect the proposed structures from flooding.

In November 2016, Althouse and Meade, Inc. (Althouse and Meade) prepared a *Grading Plan Review for Continued Agricultural Suitability in Floodway* memorandum (Agricultural Suitability memorandum; refer to Appendix C) for the project, which summarize the results of an analysis of on-site soils and grading plans, and the agricultural viability of on-soils following project grading activities. The Agricultural Suitability memorandum reviewed the project grading/drainage plans, a June 30, 2015 agricultural suitability analysis letter prepared by Althouse & Meade, and results from soil sampling conducted in July 2015 (both of which are appended to the memorandum; refer to Appendix C). This analysis identified that the on-site Cropley clay and Salinas silty clay loam topsoils are generally over five feet in depth. The proposed flood improvements may remove up to two feet of soil at the north end of the area proposed to be retained in agricultural use. The project grading plan indicates that stormwater would drain from the project site on the same slope and aspect as the current condition. Refer to

Section 2.5.3, *Infrastructure*, for a detailed discussion of grading associated with buildout of the project site.

The Agricultural Suitability memorandum determined that on-site farmland would continue to be viable for crops in the remaining deep topsoil even if up to 2.5 feet of topsoil were removed and that that post-project stormwater would continue to drain from the site on the same slope and aspect as the current condition. In addition, this analysis determined that the 24.4 acres of Salinas silty clay loam and 28.3 acres of Cropley clay affected by project grading would retain prime agricultural soils status following the proposed re-grading of the project site.

Mitigative Components of the Specific Plan and Impact Conclusion. As discussed under Impact AG-3, San Luis Ranch Specific Plan Policy 2.4 requires strict monitoring of the conversion of active agriculture to non-agricultural uses and considers the possible effects of new development on character of the community as a whole. Project grading activities may remove up to two feet of soil at the north end of the agricultural area proposed to be retained with the project. However, on-site farmland would remain viable even if up to 2.5 feet of topsoil were removed, on-site soils will retain prime agricultural soils status, and stormwater will drain from the site on the same slope and aspect as the current condition following project implementation. As such, agricultural viability will be retained after removal of topsoil resulting from implementation of the proposed grading and drainage plan for the project site. Therefore, potential impacts to the agricultural viability of on-site soils would be less than significant.

Mitigation Measures. No mitigation measure would be required.

Residual Impacts. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. Planned buildout of the City of San Luis Obispo under the General Plan, including buildout of previously approved (Margarita and Orcutt) or proposed (San Luis Ranch, Avila Ranch, Madonna) specific plans, would result in conversion of agricultural land to non-agricultural uses. The conversion of agricultural land within the City would potentially result in incompatibilities with agricultural uses and decrease in Prime Farmland, Unique Farmland, and/or Farmland of Statewide Importance.

However, as described in the LUCE Update EIR, adherence to General Plan policies and applicable state and federal regulatory requirements would reduce any cumulative agricultural impacts resulting from buildout of the City under the General Plan, including buildout of the San Luis Ranch Specific Plan, to a less than significant level. Implementation of the project would contribute incrementally to the loss of agricultural land within the City and in San Luis Obispo County by converting approximately ~~59.3~~ 56 acres of Prime Farmland to non-agricultural use. Although agricultural resources in the project vicinity are mainly in areas outside of City limits, agriculture is a major industry in San Luis Obispo County. Development of Prime Farmland and Farmland of Local or Statewide Importance would contribute to cumulative impacts to regional agricultural resources. Such impacts would result in incompatibilities with agricultural uses and a decrease in Prime Farmland, Unique Farmland, and/or Farmland of Statewide Importance. San Luis Obispo County has experienced the trend of conversion of agricultural resources to developed uses; between 2010 and 2012, the FMMP recorded a net loss of 3,601 acres of Important Farmland, and between 2008 and 2010, the

FMMP recorded a net loss of 810 acres (Department of Conservation 2012; Department of Conservation 2010).

Consistent with the LUCE Update EIR, the project would implement mitigation measures to ensure compliance with the goals and policies of the General Plan. As with the project, other cumulative development within the City that would result in the conversion of agricultural resources would be subject to Land Use Element Policies 1.8.1 and 1.9.2, and Conservation and Open Space Element Policy 8.6.3. As a result, cumulative impacts would be less than significant.

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