

### 3.2 AGRICULTURAL RESOURCES

The following section evaluates the potential impacts of the Avila Ranch Development Project (Project) on site-specific and regional agricultural resources, including prime farmland located within the City of San Luis Obispo (City). It also evaluates the Project's consistency with the Conservation and Open Space (COS) Element and Land Use Element goals, programs, and policies in the City's General Plan and related planning policy documents, as well as relevant



*The Project site supports active agricultural production of row crops and has been in agricultural use for decades.*

state policies and regulations. The analysis for agricultural resources uses Land Evaluation and Site Assessment (LESA) methodology to determine the potential for significance of impacts, which are assessed in this section below. LESA Model estimates for the Project site are contained within Appendix G of this Environmental Impact Report (EIR).

Agricultural resources consist of any farmland with potential for agricultural productivity. Important agricultural resources are identified by the State of California as sites containing superior or unique soil as identified by the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), or Important Farmland as defined by the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP)<sup>1</sup>, or other important agricultural production properties. Such resources may be protected by agricultural zoning or Williamson Act contracts to prevent conversion to non-agricultural use.<sup>2</sup> Data for this section was derived from the review of the City's General Plan Land Use and Circulation Element (LUCE) Update

<sup>1</sup> The FMMP assesses the location, quality, and quantity of agricultural lands and monitors the conversion of these lands to nonagricultural uses. The FMMP classifies Important Farmland based on agricultural soil quality and current land use into four categories of important farmlands: prime farmland, farmland of statewide importance, unique farmland, and farmland of local importance. Important farmlands contain soils best suited for producing food and forage, particularly for producing high-yield crops.

<sup>2</sup> A Williamson Act contract is an agreement between private landowners and the government to restrict specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments (refer to Section 3.2.2, *Regulatory Setting*, for additional detail).

EIR (2014) and COS Element (2006); analysis of the site’s relationship to the surrounding uses; NRCS soil maps; FMMP San Luis Obispo Important Farmland Map; and review of the Design Guidelines proposed for the Project provided in Appendix F (City of San Luis Obispo 2006, 2014; Department of Conservation 2015; NRCS 2015).

#### **3.2.1 LUCE Update EIR**

The 2014 LUCE Update EIR previously analyzed agricultural impacts of development planned under the LUCE including that for the Project site. The LUCE Update EIR noted that the Project site has historically been used for agriculture, and portions of the site contain prime soils, although the Project site is not currently under a Williamson Act contract. The LUCE Update EIR identified significant impacts to agricultural resources due to the loss of agricultural land from development of the Project site with up to 700 housing units and 15,000 to 25,000 square feet (sf) of commercial space. However, the EIR concluded that implementation of the proposed LUCE Update policies, and amendments to existing City policies, would reduce impacts to a less than significant level. In particular, the LUCE would incorporate program-level mitigation measure AG-1, which amends LUCE Policy 1.8.1, Open Space Protection to state “productive agricultural land shall be protected for farming”; the LUCE Update EIR also incorporates Policy COS 8.6.3, which requires the loss of agricultural land to be mitigated in order to reduce impacts (City of San Luis Obispo 2014). The relationship of the Project’s potential impacts to agricultural land with the LUCE EIR findings are discussed more fully in Impact AG-1 and its residual impacts discussion as well as within Section 3.2.4.4, *Cumulative Impacts*.

#### **3.2.2 Environmental Setting**

##### **3.2.2.1 Regional Context**

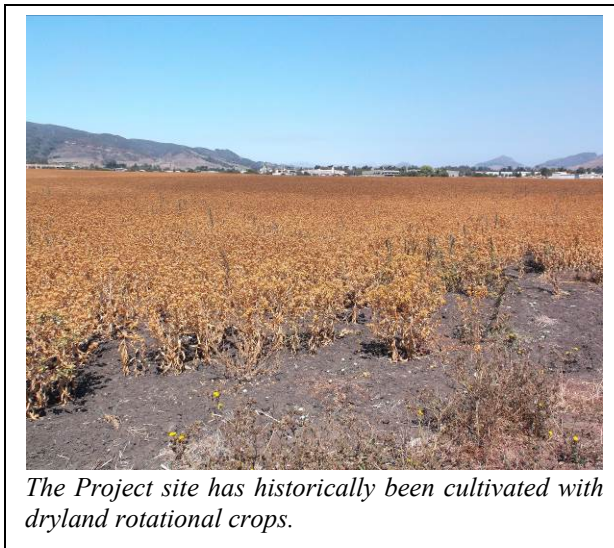
Agriculture is a major production industry in the County of San Luis Obispo (County) with a gross production value of \$903 million in 2014. Top crops by value in 2014 included: strawberries (\$205 million), wine grapes (\$203 million), cattle and calves (\$129 million), broccoli (\$57 million), and vegetable transplants (\$33 million) (County of San Luis Obispo 2014). Agricultural production creates a multiplier effect, creating jobs and economic output in many other sectors of the local economy, including tourism, industrial, retail, and commercial services. There are no lands zoned for agriculture within City limits as agricultural resources in the vicinity of the City are mainly in areas south and southeast of the City limits. However, a small percentage of land within City

limits is currently utilized for agricultural purposes, including the City’s *Calle Joaquin Agricultural Reserve*, as well as the Project site. Agricultural activity in the region includes mainly rotational row crops and vineyards in level or gently sloping areas and livestock grazing in foothill areas.

The City is located in the heart of San Luis Obispo County and the Central Coast region, encompassing a total of 12.93 square miles (approximately 8,275.2 acres) of land that is largely developed (City of San Luis Obispo 2014). The City is surrounded by lands used for either grazing or agricultural cultivation, with both cultivated and grazing lands designated for agricultural use adjacent to, and southeast of, the Project site in unincorporated areas of the County within the City’s planning area. Agricultural operation on lands in the Project vicinity generally include rotational row crops, oat fields, and vineyards (City of San Luis Obispo 2014).

3.2.2.2 Local Context

Lands within the City currently used for agricultural purposes are located approximately 0.5 to 1.0 mile north and northwest of the Project site. All these lands are designated for urban development and are subject to eventual conversion. The Project site is adjacent to County-designated agricultural lands to the east, south, and southwest. These lands are designated by the County for agricultural use and include prime farmland, farmland of statewide importance, and farmland of local importance as designated by the FMMP. The agricultural lands adjacent to the southeast, south, and southwest of the site supports areas of row crop cultivation and grazing and are under Williamson Act contract, while the parcels to the east support limited cultivation and are not under Williamson Act contract (Table 3.2-1).



**Table 3.2-1. Agricultural Lands within the Project Vicinity**

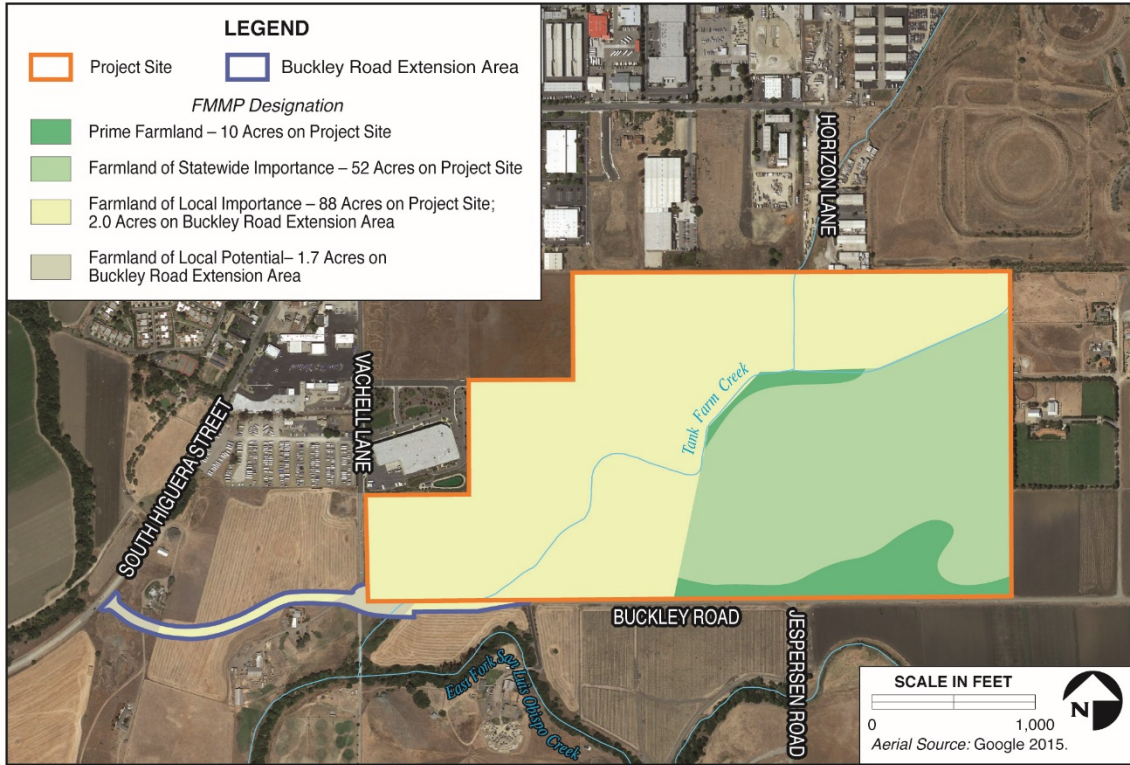
Parcel #/ Location	Size (Acres)	Williamson Act Contract?	Current Use	Land Use Category
076-061-002/ southeast <sup>1</sup>	388	Yes	Row crops/ open grassland	Agriculture
076-064-001/ south	116	Yes	Row crops	Agriculture
076-071-011/ south	57	Yes	Row crops/ open grassland	Agriculture
076-071-016/ west	57	No	Row crops	Urban Lands/ Agriculture

<sup>1</sup> This parcel is subject to a permanent agricultural easement.

The 57-acre parcel to the west of the Project site is designated by the County for agricultural uses, but is not under a Williamson Act contract; the land is currently under row crop production (see Table 3.2-1). The FMMP map designates this parcel as farmland of local importance, while the NRCS classifies onsite soils as prime farmland. This parcel lies along the planned extension of Buckley Road.

3.2.2.3 Project Site

The 150-acre Project site is located entirely within the City limits. The site is adjacent to and north of the City-County boundary and overlaps the City’s Urban Reserve Line (URL). Under the LUCE, the entire site is designated as a Specific Planning Area, which allows a variety of urban uses. Approximately 110 acres of the site are currently zoned as Specific Plan Area and 40 acres along the southern and eastern regions of the site are zoned Open Space. The site has been historically used for agricultural purposes since at least 1918 (Grisanti & Associates 2011). The site currently contains agricultural operations such as dryland field crops, including wheat, barley, oats, and safflower, as well as irrigated crops such as peas and tomatoes. Crops onsite are irrigated with groundwater from a private well located towards the northwest corner of the site, which provides from 90 to 95 acre feet per year (AFY) of water (Cannon 2015).



Agricultural Resources within the Project Site

**FIGURE 3.2-1**

According to the 2012 FMMP maps, the Project site contains approximately 10 acres of prime farmland, 52 acres of farmland of statewide importance, and 88 acres of farmland of local importance (California Department of Conservation 2012; see Figure 3.2-1). However, as discussed below, the NRCS soil classification system identifies a greater proportion of prime soils on the site.

Agricultural Soils within the Project Site

The NRCS identifies prime soils as those with a Land Capability Classification (LCC) of Class I or II. Many soils are given a LCC of Class I or II only when irrigated, but otherwise receive a lower rating without irrigation.<sup>3</sup> Soils in the Project site are comprised of approximately 78.2 acres of prime agricultural soils and 71.8 acres of non-prime soils as set forth below (NRCS 2015; see Figure 3.2-2 and Table 3.2-2):

<sup>3</sup> Land Capability Classification (LCC) indicates the suitability of soils for most kinds of crops. Groupings are made according to the limitations of the soils when used to grow crops, and the risk of damage to soils when they are used in agriculture. Soils are rated from Class I to Class VIII, with soils having the fewest limitations receive the highest rating (Class I) (California Department of Conservation 1997).



- Concepcion loam – The Concepcion loam constitutes approximately 71.8 acres of the Project site, generally to the east of Tank Farm Creek. This soil type is rated with an LCC of Class IIIe with and without irrigation. Concepcion loam is non-prime but is considered farmland of statewide importance by the NRCS.
- Cropley clay – The Cropley clay constitutes approximately 43 acres of the Project site and is rated with an LCC of Class IIs with irrigation and Class IIIs without irrigation. This soil is considered prime farmland if irrigated.
- Diablo clay – The Diablo clay constitutes approximately 1.9 acres of the site and is rated with an LCC of Class IIe with irrigation and Class IIIe without irrigation. This soil is considered prime farmland if irrigated.
- Salinas clay – The Salinas silty clay loam covers approximately 10.6 acres on site and is rated with an LCC of Class I with irrigation and Class IIIc without. This soil is considered prime farmland if irrigated.
- Marimel sandy clay loam – The Marimel sandy clay layer constitutes approximately 20 acres of the site and is rated with an LCC of Class IIw with and without irrigation. This soil is considered prime farmland if irrigated.
- Marimel silty clay loam – The Marimel silty clay present on site covers approximately 2.7 acres and is rated with an LCC of Class I with irrigation and Class IIIc without. This soil is considered prime farmland if irrigated.

**Table 3.2-2. Project Site Soil Capabilities**

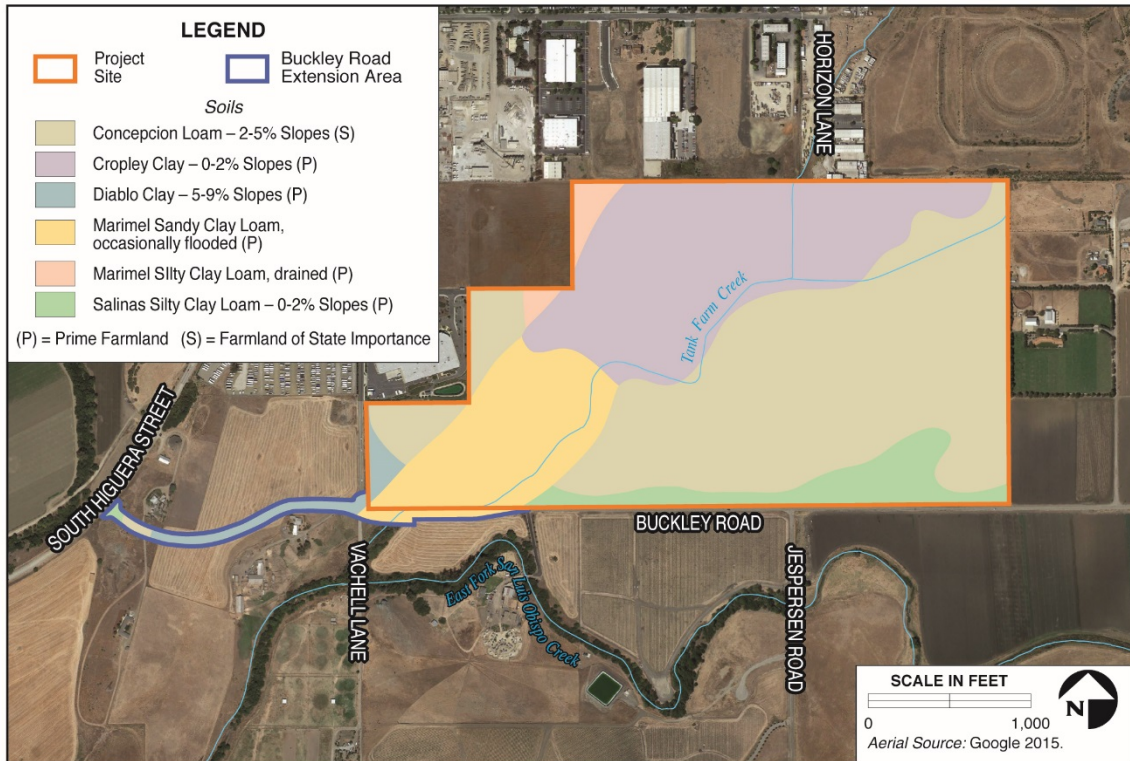
Map Symbol	Soil Name	Acreages in Project Site	Class		Important Farmland Designation <sup>1</sup>	Slope %	Surface Runoff	Irrigation Limitation
			IR	NI				
120	Concepcion loam	71.8	IIIe	IIIe	Non-prime	0 to 5	Very high	Water availability
127	Cropley clay	43.0	IIs	IIIs	Prime (if irrigated)	0 to 2	Medium	Water availability
129	Diablo clay	1.9	IIe	IIIe	Prime (if irrigated)	5 to 9	Very high	Water availability
169	Marimel sandy clay	20	IIw <sup>2</sup>	IIIw	Prime (if irrigated)	Occasionally flooded	High	Water availability
170	Marimel silty clay	2.7	I	IIIc	Prime (if irrigated)	Drained	Medium	Water availability
197	Salinas silty clay	10.6	I	IIIc	Prime (if irrigated)	0 to 2	Negligible	Water availability

Notes: IR = irrigated; NI = non-irrigated.

<sup>1</sup> NRCS criteria for prime soils is the same as that used for the Farmland Protection Policy Act, which is dependent on site-specific irrigation and drainage; however, it is noted that prime soils under Williamson Act criteria only considers soils with Class I or II capabilities as prime (NCRS 2016).

<sup>2</sup> Under criteria used under the Williamson Act, IIIw soils would not be considered prime soils.

Source: NRCS 2015.



Agricultural Soils within the Project Site

**FIGURE 3.2-2**

**3.2.3 Regulatory Setting**

3.2.3.1 Federal

There are no federal regulations or policies related to agricultural resources which apply to this Project.

3.2.3.2 State

Farmland Mapping and Monitoring Program (FMMP)

The California Department of Conservation established the FMMP in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of these lands throughout California. The list below provides a comprehensive description of all categories mapped by the California Department of Conservation (Department of Conservation 2015).

- **Prime Farmland** – Farmland that has the best combination of physical and chemical features and is able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to sustain

- high yields. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Farmland of Statewide Importance** – Farmland similar to prime farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
  - **Unique Farmland** – Farmland with lesser quality soil that is used for production of the state’s leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards, which are found in some climatic zones in California. Land must have been used for crops at some time during the 4 years prior to the mapping date.
  - **Farmland of Local Importance** – Land of importance to the local agricultural economy as determined by each county’s board of supervisors and a local advisory committee.
  - **Grazing Land** – Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen’s Association, University of California Cooperative Extension, and other groups interested in grazing activities. The minimum mapping unit for Grazing Land is 40 acres.
  - **Urban and Built-up Land** – Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or about six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, and public administrative purposes; railroad and other transportation yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment facilities; water control structures; and other developed purposes.
  - **Other Land** – 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 and 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.

#### 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 was established in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of these lands. The FMMP looks at agricultural land use and land use changes throughout California.



Williamson Act

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is promulgated in California Government Code Section 51200-51297.4. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. Specifically, this legislation enables landowners who voluntarily agree to participate in the Williamson Act program, to receive assessed property taxes according to the income-producing value of their property in agricultural use, rather than on the property's assessed market value. The Project site is not under a Williamson Act contract, but multiple parcels to the south of the site are under a Williamson Act contract.

The Williamson Act program is administered by the California Department of Conservation in conjunction with local governments, which administer the individual contract arrangements with landowners. The landowner commits the parcel to a 10-year "rolling" period wherein no conversion out of agricultural use is permitted. Each year the contract automatically renews unless a notice of non-renewal or cancellation is filed. In return, the land is taxed at a rate based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. An application for immediate cancellation can also be requested by the landowner, provided that the proposed immediate cancellation application is consistent with the cancellation criteria stated in the California Land Conservation Act and those adopted by the affected county or city. Non-renewal or immediate cancellation does not change the zoning of the property. Participation in the Williamson Act program is dependent on county adoption and implementation of the program and is voluntary for landowners.

The Williamson Act states that a board or council shall, by resolution, adopt rules governing the administration of agricultural preserves. The rules of each agricultural preserve specify the uses allowed. Generally, commercial agricultural uses are permitted within an agricultural preserve; however, local governments may identify compatible uses permitted with a use permit.

California Government Code Section 51238.1 allows a board or council to deem compatible any use, without conditions or mitigation that would otherwise be considered incompatible. However, this may occur only if that use meets the following conditions:

- The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels on other contracted lands in agricultural preserves.
- The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.
- The use will not result in the significant removal of adjacent contracted land from agricultural or open space use.

While the Project site is not under Williamson Act contract, some nearby agricultural operations are subject to such contracts.

#### 3.2.3.3 Local

##### County of San Luis Obispo General Plan

Although the Project site is within the City, the County's General Plan is applicable to certain offsite improvements associated with the Project, such as the Buckley Road extension, and may also be relevant when considering the potential for Project impacts to adjacent or nearby agricultural operations.

##### *Agriculture Element*

**Goal AG-2** – 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.

**Goal AG-3** – 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.
- c. Maintain and strengthen the county’s agricultural preserve program (Williamson Act) as an effective means for long-term agricultural land preservation.
- d. Provide incentives for landowners to maintain land in productive agricultural uses.

**AGP17: Agricultural Buffers** – Protect land designated Agriculture and other lands in production agriculture by using natural or man-made buffers where adjacent to non-agricultural land uses.

County of San Luis Obispo Agricultural Buffer Policy

The County has adopted agricultural buffer policies to ensure the protection of agricultural lands and to reduce potential land use conflicts with surrounding development (Appendix T). These recommended buffers are intended to limit human-occupied structures that are near parcels that are currently used for agriculture, are zoned agriculture, or are zoned for a non-agricultural use, and may require mitigation as part of proposed development to address potential land use conflicts (see Table 2 of the County Agricultural Buffer Policies and Procedures).

**Table 2. Zoning and Buffer Recommendations**

<u>Adjacent Parcel</u>			<u>Project Parcel Mitigation</u>
<u>Zoning</u>	<u>Ag Use</u>	<u>Buffers May be Recommended</u>	<u>Proposed Development Possibly Affected</u>
<u>Ag. Zone</u>	<u>Production Ag. Use</u>	<u>Yes</u>	<u>Yes</u>
<u>Ag. Zone</u>	<u>Prime Soils</u>	<u>Yes</u>	<u>Yes</u>
<u>Ag. Zone</u>	<u>Realistic Future Ag. Use</u>	<u>Yes</u>	<u>No</u>
<u>Non-Ag. Zone</u>	<u>Production Ag. Use</u>	<u>Yes</u>	<u>Yes<sup>1</sup></u>
<u>Non-Ag. Zone</u>	<u>Non-production Ag. Use</u>	<u>No</u>	<u>No</u>
<u>Non-Ag. Zone</u>	<u>Realistic Future Production Ag. Use</u>	<u>No</u>	<u>No</u>

<sup>1</sup>Production agricultural use parcels in non-agricultural zones which have historic agricultural value, prime soils, or other unique agricultural characteristics, will receive the same level of recommended mitigation protection as do agricultural zoned parcels.

The buffer policies provide flexibility in buffer distances which are to be determined on a case-by-case basis. Where land is currently used for Intensive Agricultural Uses such as production level, irrigated cropland, vineyards or orchards, the County recommends a 100 to 600-foot-wide buffer, and where land is used for Non-Intensive Agricultural Use such as dry farming or rangeland and pasture, the County recommends a 50 to 200-foot-wide buffer. Where a potentially affected property is not in agricultural use at the time of the evaluation, the policy states that no buffer is warranted, and where a potentially affected parcel has a non-agricultural zone and non-production agricultural use and/or only future possible production agricultural use, no buffers are required by the County's Agricultural Buffer Policies and Procedures.

#### City of San Luis Obispo General Plan

##### *Land Use Element*

The City of San Luis Obispo's adopted *General Plan Land Use Element* outlines multiple policies designed to protect agricultural resources and prime agricultural land. The City's General Plan sets forth specific requirements for the Project vicinity and Project site, as well as overall requirements for protection of agricultural land and required mitigation standards for loss of agricultural land. Policies relevant to the proposed Project are listed below:

***Policy LU 1.4 Urban Edges Character.*** The City shall maintain a clear boundary between San Luis Obispo's urban development and surrounding open land. Development just inside the boundary shall provide measures to avoid a stark-appearing edge between buildings in the City and adjacent open land. Such measures may include: using new or existing groves or windrows of trees, or hills or other landforms, to set the edge of development; increasing the required side-yard and rear-yard setbacks; and providing open space or agricultural transition buffers.

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

- B. Be located on other than prime agricultural land and be situated to allow continued agricultural use;

*Conservation and Open Space Element*

The City of San Luis Obispo's adopted General Plan COS Element also contains policies designed to protect agricultural resources and prime agricultural land, as well as offset the development of agricultural areas. Policies relevant to the proposed Project are listed below:

**Policy COS 8.1 Greenbelt, Open Space Outside the Urban Area.** Secure and maintain a healthy and attractive greenbelt around the urban area, comprised of diverse and connected natural habitats, and productive agricultural land that reflects the City's watershed and topographic boundaries.

**Policy COS 8.2.2 GOAL: Open Space within the Urban Area.** 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 COS 8.3.2 Open Space Buffers.** 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:

- A. Between urban development -- including parks and public facilities-- and natural habitats such as creeks, wetlands, hillsides and ridgelines, Morros, scenic rock outcrops and other significant geological features, and grassland communities, to address noise, lighting, storm runoff, spread of invasive, non-native species, and access by people and pets (see also the Safety Element for "defensible space" next to wildland fire areas).
- B. Between urban development and agricultural operations, to address dust, noise, odors, chemical use, and access by people and pets.
- C. Between agricultural operations and natural habitat, to address noise, chemical use, sediment transport, and livestock access.
- D. Between new development and cultural resources, to address visual compatibility and access by people.
- E. Between new development and scenic resources or the greenbelt, to address view blockage, lighting and noise, and visual transition from urban character to rural character.
- F. Urban development or uses located adjacent to the URL to provide a transition to open space or greenbelt areas. Transition areas should add to the preservation of open space lands or resources. At a minimum, a 50-foot transition area (preserved in essentially a natural state) shall be provided within the project along the project boundary with the URL, unless the transition area is defined elsewhere in the Conservation and Open Space Element.

**Policy COS 8.6.1 Loss of Open Space.** The City may permit loss of an open space resource as described in Goals 8.2.1 and 8.2.2 only when:

- A. Preserving the resource would permanently deprive the landowner of all reasonable use, and acquisition by the City or a conservation organization is not feasible, or

- B. There is a demonstrated need, based on public health, safety, or welfare, and there is no practical alternative to loss of the resource, or
- C. The resource is on a small parcel essentially surrounded by urban development, and the development contributes to the protection of agricultural land in the urban reserve or greenbelt through transfer of development credit, dedication of open space easements or fee ownership, direct funding for open space acquisition or another equally effective method, as further described in the Land Use Element.

***Policy COS 8.6.3 Required Mitigation.*** 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.

- C. 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.
- G. Any development that is allowed on a site designated as Open Space or Agriculture, or containing open space resources, shall be designed to minimize its impacts on open space values on the site and on neighboring land.
  - 1. Hillside development shall comply with the standards of the Land Use Element, including minimization of grading for structures and access, and use of building forms, colors, and landscaping that are not visually intrusive.
  - 2. Creek corridors, wetlands, grassland communities, other valuable habitat areas, archaeological resources, agricultural land, and necessary buffers should be within their own parcel, rather than divided among newly created parcels. Where creation of a separate parcel is not practical, the resources shall be within an easement. The easement must clearly establish allowed uses and maintenance responsibilities in furtherance of resource protection.
  - 3. The City will encourage the County not to create new parcels within the greenbelt, with the exception of those permitted under the County's agriculture cluster incentive. Outside of cluster districts, allowed parcel sizes within the greenbelt should be no smaller, and the number of dwellings allowed on a parcel should be no greater than as designated in the September 2002 San Luis Obispo Area Plan and related County codes.

4. The City will encourage the County to adopt and implement a mandatory cluster district for appropriate areas of the greenbelt under County jurisdiction to preserve open space qualities, consistent with the Conservation and Open Space Element. The City will encourage other agencies to follow these policies.

#### Airport Area Specific Plan

The following are existing policies from the AASP that would apply to the Project. The Project also includes proposed amendments to AASP policies, as described in Section 2.0, *Project Description* and provided in Appendix R.

***Policy 3.2.18 Mitigate Loss of Ag and Open Space Land.*** To mitigate the loss of agricultural and open land in the Airport Area, development shall help protect agricultural and open space lands to the south and east by securing protected areas at least equal to the area of the new development, where onsite protection is not available.

***Policy 3.2.20 Acquire Land South of Airport.*** Utilize locally-generated acquisition funding, as well as outside grant support, to acquire fee or easement interest in lands south of the airport in the following order of priority:

*Buckley Road Area.* Agricultural lands on either side of Buckley Road between Vachell Lane and Broad Street should receive the highest priority in conservation funding. There is ongoing, incremental conversion of lands from agriculture to other uses, as well as ongoing small-scale subdivision of rural properties. There are relatively few large properties in this area. Easements to secure development rights and maintain scenic character would be the primary focus of this effort, and easement acquisition is the preferred strategy.

*Other Lands.* Areas such as the ranches and woodland areas south of the Airport may also be targeted for fee or easement acquisition; however, these areas are not considered as vulnerable to land use changes as the aforementioned areas.

#### **3.2.4 Environmental Impact Analysis**

##### 3.2.4.1 Thresholds of Significance

With respect to agricultural resources, applicable sections of Appendix G of the 2016 California Environmental Quality Act (CEQA) Guidelines state that a project would normally have a significant impact on the environment if it would:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use;
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract;  
or
- c) Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in the conversion of Farmland to non-agricultural use.

In addition, this analysis uses the 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 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 California Agricultural 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).

#### 3.2.4.2 Impact Assessment Methodology

This section provides a discussion of the potential impacts to agricultural resources within the Project site, associated with the conversion of prime farmland and farmland of

statewide importance to urban development, including up to 720 residential units and 15,000 sf of commercial development. This analysis builds upon the conclusions identified in the 2014 LUCE Update EIR, although its analysis is programmatic in nature and does not include Project-specific considerations. The LUCE Update EIR analyzed the potential for planned development of the Project to convert agricultural resources to developed urban uses, and concluded that impacts would be less than significant with the incorporation of program-level mitigation measures and application of existing and proposed policies, which require offsite conservation of agricultural resources. Such policies include the dedication of offsite agricultural lands or payment of in-lieu fees to ensure that such land is conserved (consistent with Policy LU 1.9.2, Prime Agricultural Land and COS Element Policy 8.6.3(C), Required Mitigation, and AASP Policy 3.2.18). In addition to Project consistency with policies related to agricultural resources, the analysis below also considers the physical loss of agricultural resources and prime soils.

The methodologies for analyzing the Project's potential impacts to agricultural resources are based on the guidelines, policies, and procedures identified in the City General Plans, the FMMP, and the California Agricultural LESA Model. Data from the California Department of Conservation and the County Department of Planning and Building were accessed to obtain mapping information related to the Project. The FMMP data utilized for the LESA Model are dated 2012, as this was the most recent available data. Additionally, soil land capability classifications were based on the Project site not currently being irrigated as stated in the Avila Ranch Development Plan. The LESA worksheets are included in Appendix G of this EIR. LESA scores for the Project site are summarized below in Table 3.2-3.

The following methods were used to determine the extent and/or significance of the Project's impact on agricultural resources:

- a) Identify onsite prime soils that would be impacted based on the NRCS designation of Prime Farmland (i.e., prime agricultural soils). The NRCS defines Prime Farmland soils as land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops.
- b) Identify any onsite land classified by the FMMP with an agricultural designation that would be directly converted as a result of the proposed development and/or use.



- c) Identify onsite and offsite areas with a County agriculture land use designation that would be directly converted or would indirectly contribute to the conversion of land as a result of the proposed development and/or uses.
- d) Perform modeling of the Project site with criteria outlined by the LESA Model developed by the California Department of Conservation.

**Table 3.2-3. LESA Analysis Summary for Project Site**

	Factor Rating (0-100 points)	Factor Weighting (Total = 1.00)	Weighted Factor Rating
<b>Land Evaluation (LE)</b>			
1. Land Capability Classification	74.44	0.25	18.61
2. Storie Index Rating	42.76	0.25	10.69
<b>Site Assessment (SA)</b>			
1. Project Size	80	0.15	12
2. Water Resource Availability	100	0.15	15
3. Surrounding Agricultural Lands <sup>1</sup>	0	0.15	0
4. Protected Resource Lands <sup>2</sup>	20	0.05	1
<b>Total LESA Score</b> (sum of weighted factor ratings)			<b>57.3</b>
<b>Significance Determination</b>	<b>Significant</b> (because both LE and SA sub-scores are each greater than 20 points).		

<sup>1</sup> Although the site is bordered by lands zoned for agriculture and in agricultural production on most of three sides, surround agricultural land within the Zone of Influence (ZOI) as defined by LESA, did not amount to more than 40% of the ZOI, therefore zero points are given in the LESA Model.

<sup>2</sup> All three parcels under Williamson Act contract are taken into account in this section. See Appendix G for complete LESA Model Worksheets for the Project site.

3.2.4.3 Project Impacts and Mitigation Measures

The implementation of the proposed Project has the potential to result in impacts to on- and offsite agricultural resources. The significance of these impacts to onsite agriculture are assessed based on LESA Model scores and also account for City policies. The Project would convert the majority of the prime farmland soil onsite to non-agricultural uses, but it would not conflict with existing zoning of the Project site. Impacts to agricultural resources were also assessed based upon consistency with goals and policies within the Land Use Element and COS Element of the General Plan (refer to Section 3.8, *Land Use and Planning*). As the Project site is not under Williamson Act contract, the proposed Project would not conflict with a Williamson Act contract. Based on the LESA analysis, the conversion of existing agricultural lands on the Project site to non-agricultural uses is considered a significant impact. In addition, the introduction of urban development in the

vicinity of remaining area agricultural operations has potential to introduce urban-rural conflicts between such uses, with potential for impacts to ongoing agricultural operations on surrounding parcels. These impacts are further discussed below.

**Table 3.2-4. Summary of Project Impacts**

Agricultural Resource Impacts	Mitigation Measures	Residual Significance
AG-1. The proposed Project would impact agricultural land within the Project site and offsite Buckley Road Extension with the direct conversion of historically cultivated farmland to urban development.	MM AG-1	Significant and Unavoidable
AG-2. Development of the proposed Project would create potential land use conflicts with continued agricultural operations to the south and east of the Project site.	MM AG-2a MM AG-2b <u>MM AG-2c</u>	Significant but Mitigable

**Impact AG-1 The proposed Project would impact agricultural land within the Project site and the offsite Buckley Road Extension with the direct conversion of historically cultivated farmland to urban development (Significant and Unavoidable).**

*Onsite Impacts*

Implementation of the proposed Project would result in the conversion of agricultural resources to developed uses. The proposed Project would consist of 68.23 acres of residential development, 16 acres of developed parkland, 7.03 acres of major roadways, and 3.34 acres of Neighborhood Commercial development. This would result in the total conversion of approximately 94.6 acres of agricultural lands. While the 2012 FMMP map classifies only 10 acres of the Project site to be prime farmland, 88 acres of local importance, and 52 acres to be farmland of statewide importance, the NRCS soil map classifies approximately half of the soils (78.2 acres) onsite as prime agricultural soils (when irrigated) and the other half as farmland of statewide importance (71.8 acres; see Table 3.2-5).

**Table 3.2-5. Comparison of FMMP vs NCRS Prime Farmland Designations**

FMMP Important Farmland		NCRS Soils	
Classification	Acres	Classification	Acres
Prime	10	Prime Soils (when irrigated)	78.2
Farmland of Statewide Importance	52	Farmland of Statewide Importance	71.8
Farmland of Local Importance	88	--	--
<b>Total</b>	<b>150</b>	<b>Total</b>	<b>150</b>

Utilizing the FMMP map and NRCS soil map, the estimated LESA score for the Project site was found to be 57.3 (see Appendix G 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 this sub-score is that the Project site is a fairly large site (150 acres), contains soils with prime farmland and farmland of statewide importance designations, consists of an onsite well that serves as a reliable water source, and there are agricultural lands under Williamson Act contract in the Project vicinity. It should also be noted that, while the majority of the site is bounded by land in active agricultural production or zoned for agricultural use, the LESA analysis does not assign points or values to the bordering agricultural land.

Conversion of prime soils within the Project site totals approximately 68 acres and is generally located to the north and west of Tank Farm Creek, which is where R-2 and R-4 residential development would be developed within Phases 1 and 2. In addition to the loss of prime soils, the Project would result in the loss of approximately 26.6 acres of farmland of statewide importance as mapped by NCRS.

Under the proposed Landscaping Plan, 27 acres of land outside the URL are proposed to be dedicated to the cultivation of dryland rotational crops. Out of the 27-acre area dedicated to dryland farming, 10 acres are NCRS prime soils located along the southern boundary of the site east of Tank Farm Creek. As a result of the development proposed for the site, approximately 68 acres of prime farmland onsite would be directly lost to residential development and about 10 acres would be maintained in dryland farming within the proposed agricultural buffer.

Given that the LESA score indicates that impacts to agricultural resources within the site are significant, and that the Project would develop approximately 68 acres of NCRS prime soils, the Project would potentially conflict with Policy LU 1.8.1, Open Space

Protection, which states that prime agricultural land, productive agricultural land, and potentially productive agricultural land shall be protected for farming, as well as AASP Policies 3.2.18 and 3.2.20, which calls for the protection of agriculture and open space within the southern Airport Area (see Section 3.8, *Land Use and Planning* for Project consistency). However, Policy LU 1.9.2, Prime Agricultural Land allows development on prime agricultural land if the development contributes to the protection of agricultural land within the URL or in the Greenbelt.

#### *Offsite Impacts*

The Project would include the extension of Buckley Road from Vachell Lane to South Higuera Street. The parcel of land that would be developed with this extension consists of 57 acres of prime farmland soils as classified by the NRCS. Currently the site is cultivated with rotational row crops. The extension would consist of a three-lane roadway (one lane in each direction and a center two-way turn lane) with a Class I bicycle path on the north and a Class II bicycle path on the south. The development of this extension would result in a direct loss of approximately 3 acres of prime soils as designated by the NRCS. However, additional prime farmland south of this road extension would be cut off from the main farming area to the north. This would be considered an indirect or secondary impact as cultivation of this area would become more difficult due to the presence of a busy road dividing this area from the main farmland north of Buckley Road.

As described above, implementation of the proposed Project would result in the loss of approximately 68 acres of prime farmland onsite and approximately 3 acres of prime farmland offsite, totaling to a loss of 71 acres. This loss of prime farmland would potentially result in conflicts with Policy 1.8.1 and would be considered a potentially significant impact. Implementation of MM AG-1 would involve acquisition of either agricultural conservation easements or fee title over similar offsite farmland offsite that is potentially threatened by urban development and, as a result, would reduce the severity of this impact. However, because it is unclear if such threatened farmland can be acquired and because the Project would still lead to a net loss of prime agricultural soils, impacts related to the loss of prime farmland would be ***significant and unavoidable***.

#### Mitigation Measure

*MM AG-1 The Applicant shall establish an offsite agricultural conservation easement or pay in-lieu fees to a City designated fund dedicated to acquiring and preserving agricultural land. While the City's priority is*

*that such agricultural land be acquired in the closest feasible proximity to the City, mitigation may be implemented using one of the following options:*

- a. The Applicant shall ensure permanent protection of farmland of equal area and quality, which does not already have permanent protection, within the City of San Luis Obispo, consistent with City Policy 8.6.3(C) and AASP Policy 3.2.18. The Applicant shall identify and purchase or place in a conservation easement a parcel of land of at least 71 acres of equal quality farmland, or provide in-lieu fees to allow the City to complete such an acquisition.*
- b. If no suitable parcel exists within the City limits, the Applicant shall identify and purchase or place in a conservation easement a parcel of farmland, of equal quantity and quality, within the City's Sphere of Influence that is threatened by development of nonagricultural uses. The parcel shall be placed in an agricultural conservation easement (refer to Figure 2 in the Land Use Element for City Sphere of Influence). The Applicant may also provide in-lieu fees to allow the City to complete such an acquisition.*
- c. In the event that no suitable land is available within the City limits or City's Sphere of Influence, the Applicant shall identify and purchase or place in a conservation easement a parcel of farmland, of equal quantity and quality, within the City's urban reserve or greenbelt that is threatened by development of nonagricultural uses. This parcel shall be placed in an agricultural conservation easement (refer to Figure 1 in the Land Use Element for City Planning Area). The Applicant may also provide in-lieu fees to allow the City to complete such an acquisition.*
- d. In the event that no suitable land for an agricultural conservation easement is available for purchase within the City limits, the City's Sphere of Influence, or urban reserve or greenbelt, the Applicant shall identify and purchase or place in a conservation easement a parcel of farmland, of equal quantity and quality, within County lands (e.g., agricultural lands north and south of Buckley Road) that is considered to be threatened by the conversion to nonagricultural use. This parcel*



*shall be placed in an agricultural conservation easement. The Applicant may also provide in-lieu fees to allow the City to complete such an acquisition. The Applicant shall demonstrate that such land is as close in proximity to the City as feasible.*

**Plan Requirements and Timing.** Notices, fees, and/or dedication of agricultural conservation easements shall be completed by the Applicant prior to the issuance of grading and building permits divided between Phases 1 and 2 of the Project based upon the acreage of prime soils impacted by each phase.

**Monitoring.** The City shall ensure compliance with Policy LU 8.6.3(C) with the collection of mitigation fees or establishment of the agricultural easement.

#### Residual Impact

Implementation of MM AG-1, consistent with Policy 8.6.3(C) Required Mitigation, would require that the Applicant to purchase land or a conservation easement of equal area and soil quality, as consistent with the NRCS mapped soils onsite (i.e., 71 acres of Class II or better soils, with or without irrigation). Storie Index Ratings may also be used to determine the suitability of farmland for protection. Selected farmland would be put into an agricultural conservation easement or the Applicant would pay in-lieu fees into a City fund dedicated to acquiring and preserving agricultural land. Implementation of MM AG-1 and compliance with policies in the Land Use Element and COS Element of the General Plan would reduce the severity of impacts of converting the property from agriculture to nonagricultural uses. However, this mitigation would not fully eliminate such impacts as it is unclear if suitable threatened farmland can be acquired by the City consistent with the requirements of MM AG-1, and because the lost prime agricultural soils would not be replaced or recreated, leaving an incremental decrease in the acreage of prime soils in the county and state. MM AG-1 focuses on loss of prime soils as they represent the highest quality of agricultural farmland, and the loss of NCRS farmland of statewide importance would also continue to be adverse, but less than significant. Overall residual impacts to agricultural resources would remain significant and unavoidable.

**Impact AG-2 Development of the proposed Project would create potential land use conflicts with continued agricultural operations to the south and east of the Project site (Significant but Mitigable).**

The Project site is surrounded by a mixture of urbanized and agricultural lands. The Project site has historically been used for agricultural purposes for at least 100 years;

however, the site is zoned as a Specific Planning Area with an Open Space-zoned buffer along the southern and eastern boundary. As such, the site is not zoned or designated for Agriculture by the City, but it does border multiple County-designated agricultural parcels to the east, south, and west; of which three parcels (to the southeast, south, and southwest) are under Williamson Act contracts.

The proposed Project entails six phases of construction ranging from one to three years each, resulting in an approximate 10-year construction period. Each phase would consist of extensive site preparation, grading, and filling which could create substantial fugitive dust and could impact nearby crops, especially during harvest time. Implementation of construction Best Management Practices (BMPs), 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. Additionally, implementation of mitigation measures related to dust control as stated in Section 3.3, *Air Quality and Greenhouse Gas Emissions*, would ensure impacts to dust are minimized (refer to Section 3.3, *Air Quality and Greenhouse Gas Emissions*, for further discussion on air quality impacts). Therefore, construction-related impacts to surrounding agricultural operations would be less than significant.

Over the longer term, the development of 720 residential units and 15,000 sf of commercial space would change the uses of the area that would increase the population within the vicinity. This would potentially impact agricultural operations in adjacent areas either through increased complaints by residents regarding agricultural operations which could interfere with production, or by trespass, vandalism, or theft at nearby farms due to increased population and ease of access.

Development and operation of the Project could create conflicts with continued agricultural operations to the ~~west~~, east and south. The proposed Project would result in the addition of approximately 1,649 residents to the area, near lands under agricultural cultivation, with potential nuisances to new homes and residents associated with ongoing agricultural operations which generate noise, dust, and possible pesticide drift, leading to complaints from future residents. However, the Project would include a 300-foot-wide open space buffer with a landscaped berm on the south and a 150-foot-wide buffer on the eastern boundary to reduce and/or avoid noise, dust, and pesticide conflicts with new residents of the area. The proposed landscape berm would add an additional measure to reduce noise impacts to residences adjacent to the buffer, from the adjacent agricultural operations (refer to Section 3.9, *Noise*, for further discussion on noise impacts).

The Project would develop R-2 residential units in the southwest portion of the site along Vachell Lane, east of lands within the County URL. These lands west of the Project site are designated Commercial Service and have been in intermittent agricultural production over the last ten years; although, these lands were not in a state of agricultural production at the time of the Project's Notice of Preparation. The property was acquired in 2000 by the California Department of Transportation as a site to relocate its headquarters and maintenance yards. The affected site currently has an access road along the west side of Vachell Lane and a Department of Motor Vehicles truck driving test track. At the time of release of the Notice of Preparation, this land was not in Intensive Agricultural Use or Non-Intensive Agricultural Use. However, the site is zoned Commercial Service and is intermittently farmed for non-intensive dry field crop production. As such, the Project would conflict with the intent of County Agricultural Buffer Policy which recommends a 50 to 200-foot-wide buffer for dry farmed crops, even where the agricultural operation is not zoned for agriculture (Appendix T). Based on the irregular and intermittent dry farm field operations, the intent of the state to develop the property in the near term, and the existing commercial zoning, there could be impacts to Project residents, and County policy would appear to require a minimum buffer of 100 feet if applied to the Project which is under City jurisdiction. As mentioned, the DMV test area and access road provide an approximately 40- to 50-foot buffer between any agricultural operations of this property and the western Vachell Lane right-of-way. Onsite Project setbacks are 20 feet from the eastern Vachell Lane right-of-way and any proposed residences, for a total buffer area from an occupied structure and any agricultural operations of approximately 100 feet (see Figure 3.2-3). This buffer is considered adequate for any future potential interim agricultural use of the Caltrans property. While there is no anticipated inconsistency with County agricultural buffer policies, additional buffer strategies may be feasible, such as installation of tree/vegetation hedgerows along the eastern Vachell Lane frontages, as recommended for other portions of the Project site.

The increase in the number of residents in the area and new accessible pathways, bike paths, and the Buckley Road widening and extension would increase public access to the agricultural areas, increasing potential conflicts and possibly increasing vandalism of farm equipment and/or operations and pilfering of crops. Buckley Road would continue to be a relatively high speed road with no parking allowed. Such potential incompatibilities with agricultural uses could potentially impact the overall economic viability of continued agricultural operations. Therefore, impacts would be *significant but mitigable*.



Proposed Agricultural Buffer  
Along Vachell Lane

**FIGURE  
3.2-3**

### Mitigation Measure

- MM AG-2a To address potential agricultural land use conflicts, the Applicant shall coordinate with the City and county to fund installation of fencing and signs along Buckley Road to minimize potential for increases in trespass and vandalism of adjacent agricultural areas. Along the south side of Buckley Road, the use of three strand barbwire fencing would be acceptable. Along the north side of the Buckley Road extension bordering the Class I bike path, spit rail fencing shall be installed or other fencing acceptable to the County.*
- MM AG-2b To reduce the potential for noise, dust, and pesticide drift to affect future Project residents, the Applicant shall ensure that Project landscape plans include planting of a windrow of trees and shrubs along the proposed southern landscape berm and eastern Project site boundary at a sufficient density to buffer the site from surrounding agricultural operations.*

MM AG-2c *To augment the existing 100-foot agricultural buffer to the Caltrans property to the west of the Project site, the Applicant shall add a 20-foot hedgerow/windrow of trees and vegetation along the east side of Vachell Lane.*

**Plan Requirements and Timing.** The Applicant shall clearly identify all proposed measures such as fencing, landscaping, etc. within the Development Plan and VTM.

**Monitoring.** The City Natural Resources Manager and planning staff, in coordination with the County, as needed, shall review the Development Plan and VTM to ensure that design includes installation of fencing and signs as required under MM AG-2a above. The City Natural Resources Manager and planning staff shall also review the final landscape plan to ensure that the species mix and density of proposed plantings would provide an adequate landscape buffer. The City shall review final development plans to ensure inclusion of appropriate buffers and should consult with County Agriculture Department staff to ensure the adequacy of agricultural buffers, and their consistency with the County Agricultural Buffer Policies and Procedures. Field inspections at appropriate Project phases shall confirm installation and compliance with MM AG 2a, 2b, and 2c above.

#### Residual Impacts

Implementation of MM AG-2a, 2b, and 2c would reduce this potential impact to less than significant by identifying and incorporating appropriate measures such as fencing and signs to reduce public access to agricultural cultivation areas and to ensure installation of adequate landscape buffers to limit conflicts between new residential development and existing agriculture. However, completion of a major residential development at the southern edge of the City has the potential to incrementally increase urban-rural conflicts, increasing pressure on agricultural operations as well as the potential for pressure for further growth and development on surrounding lands (see Section 4.2, *Growth Inducing Impacts*). Therefore, this impact would be less than significant after mitigation.

#### 3.2.4.4 Cumulative Impacts

Implementation of the proposed Project would contribute incrementally to the loss of agricultural land to development within the City and in San Luis Obispo County. Although agricultural resources in the Project vicinity are mainly in areas outside of City limits,



agriculture is a major industry in the County. Development of prime farmland and farmland of local or statewide importance within the Project site 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).

Within the City, pending projects such as the San Luis Ranch Specific Plan and Froom Ranch Specific Plan could result in the conversion of approximately 242 acres of agricultural land to urban uses.

Consistent with the LUCE Update EIR, the proposed Project would implement mitigation measures to ensure compliance with the goals and policies of the General Plan. Similar to the proposed Project, other cumulative development within the City that would result in the conversion of agricultural resources and would be subject to Policies LU 1.9.2, Prime Agricultural Land; AASP Policy 3.2.18; and LU 8.6.3, Required Mitigation. However, cumulative development would continue to result in the irreversible loss of agricultural resources and the Project's contribution of a loss of 150 acres of agricultural soils (71 acres of prime soils) to this trend would be cumulatively considerable. Therefore, cumulative impacts would be *significant and unavoidable*.

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