



COUNTY OF SAN LUIS OBISPO

DEPARTMENT OF AGRICULTURE / WEIGHTS & MEASURES

Martin Settevendemie, Agricultural Commissioner / Sealer of Weights & Measures

DATE: December 18, 2019
TO: Shawna Scott, Senior Planner, San Luis Obispo Community Development Department
FROM: Lynda L. Auchinachie, San Luis Obispo County Agriculture Department
SUBJECT: Froom Ranch Specific Plan Draft Environmental Impact Report (3175)

Thank you for the opportunity to comment on the draft environmental impact report (DEIR) for the Froom Ranch and Villaggio Life Plan Community Specific Plan project. It appears that our department's notice of preparation (NOP) question regarding the proposed reconfiguration of the existing agricultural easement has been addressed. However, our department continues to be concerned that impacts to "prime agricultural land," as defined in Government Code 56064, may need further consideration based on:

- The DEIR indicates there are over 45 acres of Cropley clay (0-2 percent slope) and Salinas silty clay loam (0-2 percent slope) soils that would be converted as a result of the proposed project. These are the same soils that supported a variety of high value vegetable crops on the San Luis Ranch site.
- The above soils have an irrigated rating of class 1 or 2 by the USDA Natural Resources Conservation Service.
- It appears irrigated production is feasible as the DEIR indicates there are adequate onsite water resources for irrigation during drought and non-drought years.
- It appears the Cropley clay and Salinas silty clay loam meet the definition of prime agricultural land and therefore local policies to protect agricultural resources may require an agricultural easement.

Thank you for your consideration. If you have questions, please call 781-5914.

cc. David Church, LAFCO Executive Director