

3.2 AGRICULTURAL RESOURCES

This section describes agricultural resources and evaluates the potential impacts of the Project on site-specific and regional agricultural resources. Agricultural resources consist of any farmland with potential for agricultural productivity based on soil and farmland characteristics. Prime soils are superior or unique soils as identified by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). As identified by the State of California, Important Farmlands contain soils best suited for producing food and forage, particularly for



The Project site contains a 7.1-acre open space and agricultural conservation easement and supports soils classified as prime, if irrigated, by the Natural Resources Conservation Service (NRCS). See page 3.2-12 for further discussion.

producing high-yield crops as defined by the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP). 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.¹

Other important agricultural land may be defined and protected by agricultural zoning or Williamson Act contracts to prevent conversion to non-agricultural use. 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 (see also, Section 3.2.2, *Regulatory Setting*). Further, agricultural resources can include non-irrigated grazing lands where the prevalence of steep slopes, less fertile soils, and lack of irrigation source may limit their use for cultivation or other agricultural product production.

3.2.1 Environmental Setting

3.2.1.1 Regional Setting

Agricultural activity in the region includes mainly rotational row crops, vineyards in level or gently sloping areas, and livestock grazing in foothill areas. Agriculture is a major

¹ The FMMP also assesses the location, quality, and quantity of agricultural lands and monitors the conversion of these lands to non-agricultural uses.

production industry in the County with a gross production value of \$1.035 billion in 2018. Top crops by value in 2018 included: wine grapes (\$276 million), strawberries (\$268 million), broccoli (\$48 million), avocados (\$46 million), cattle and calves (\$43 million), vegetable transplants (\$35 million), cauliflower (\$30 million), cut flowers (\$26 million), head lettuce (\$25 million), and lemons (\$24 million) (County of San Luis Obispo 2019). Agricultural production generates both direct revenues and indirect value through job creation and economic output in other sectors of the local economy, including tourism, industrial, retail, and commercial services.

Agricultural areas within the City limits are primarily located northeast of the Project site, within a large swath of cultivated land adjacent to U.S. 101 (commonly known as Dalidio Ranch or San Luis Ranch); however, a Specific Plan and proposed development on this site has been recently approved and is under construction. Following development of the San Luis Ranch project, 52.7 acres of the existing 131-acre site would remain as agricultural land (refer also to Section 3.2.3.4, *Cumulative Impacts*). Additional agricultural lands in the Project vicinity are located to the southeast in unincorporated areas of the County, adjacent to the City limit. Several unincorporated parcels southeast of the City are also subject to Williamson Act contracts. These agricultural lands generally support rotational row crops, oat fields, and vineyards (City of San Luis Obispo 2014). There are no lands in active agricultural production or lands under a Williamson Act contract immediately adjacent to the Project site.

3.2.1.2 Project Site

Farmland within the Project Site

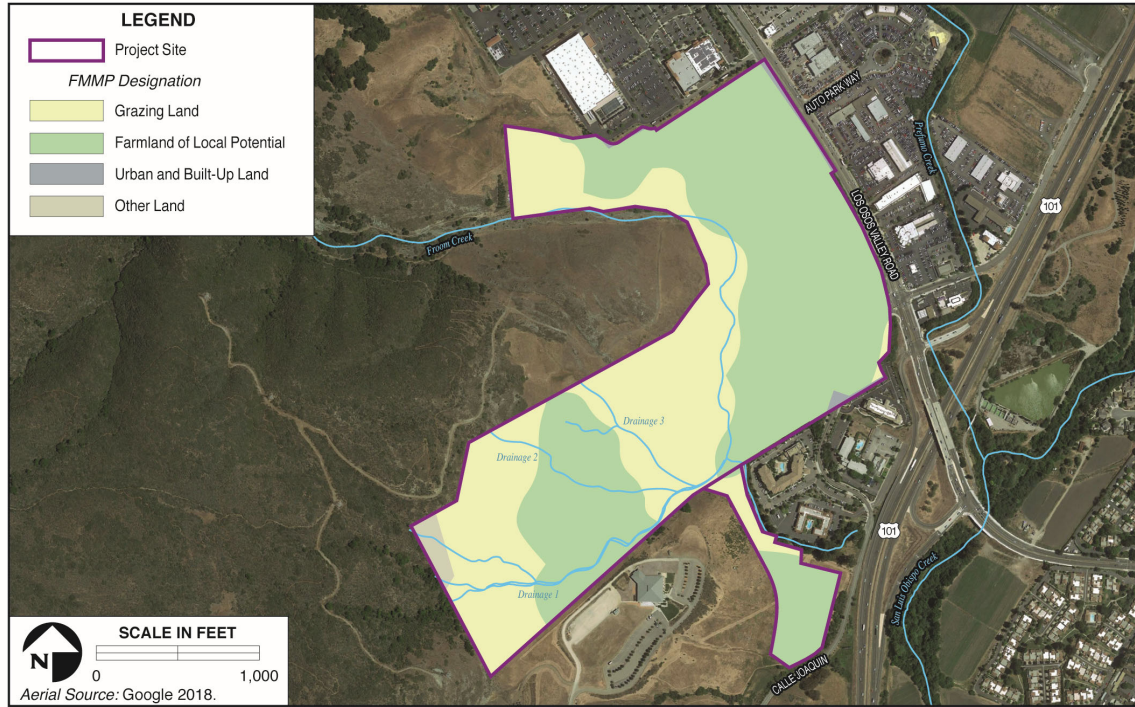
The Specific Plan area is currently used for grazing horses. Historically, the Specific Plan area has been used for grazing operations associated with the former Froom Ranch Dairy since at least 1844 (Appendix F). The proposed stormwater detention basin area is undeveloped and there is no record of agricultural operations on this portion of the Project site.

According to the FMMP, the Project site contains approximately 67.6 acres of Farmland of Local Potential, which are lands having prime or



The Project site has historically been used for grazing, currently for horses. Portions of the site are also identified as Farmland of Local Potential by the FMMP. While the site formerly served as grazing for the historic Froom Ranch Dairy, there is no record of cultivation on the site.

statewide farmland characteristics, but that are not cultivated; 46.2 acres of grazing land; and 2.3 acres of other and urban/built-up land (California Department of Conservation 2016; Figure 3.2-1 and Table 3.2-1). There is no Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance within the Project site. The Project site is not under a Williamson Act contract.



Agricultural Resources within the Project Site

FIGURE 3.2-1

Table 3.2-1. Project Site FMMP Resources

FMMP Designation	Specific Plan Area (acres)	Proposed Stormwater Detention Basin Area (acres)	Project Site (Total)	Percentage ¹
Farmland of Local Potential	62.4	5.2	67.6	58.3%
Grazing	44.5	1.7	46.2	39.8%
Urban/Built-Up and Other	2.2	0.1	2.3	2.0%

¹Totals do not add to 100 percent due to rounding.

Agricultural Soils within the Project Site

The NRCS assesses the potential agricultural productivity and limitations of different soils by utilizing both the land capability classification (LCC) system (described in the National

Soil Survey Handbook Part 622.02) and the Important Farmland Inventory (pursuant to requirements of Code of Federal Regulations [CFR] Chapter 7 Part 657). The LCC indicates the suitability of soils for most kinds of crops, where 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 receiving the highest rating (Class I). The system is subdivided into capability class and capability sub-class. LCC sub-classes are utilized to further characterize soils within a specific class by designating the main hazard by which a particular soil is limited by reference to a letter, including: erosion (e); water (w); shallow, droughty, or stony (s); and very cold or very dry (c). Class I soils have no sub-classes because soils of this type have few limitations (California Department of Conservation 1997). The NRCS identifies prime soils as those with an LCC of Class I or II. Many soils are assigned Class I or II only when irrigated, but otherwise receive a lower rating without irrigation.

Soils at the Project site consist of approximately 47.6 acres of prime agricultural soils if irrigated, and approximately 67.2 acres of non-prime soils based on NRCS soil classifications. The prime if irrigated agricultural soils consists of Cropley clay and Salinas silty clay loam (NRCS 2018; see Tables 3.2-2 and 3.2-3, and Figure 3.2-2). Cropley clay is a -very deep, moderately well-drained, nearly level soil with slow permeability and slow surface runoff. The hazard of water erosion is slight, and the shrink swell potential of this soil is high. This soil is suited for vegetable crops, dryland farming, and pasture. If used for urban development, foundations and footings should be designed to compensate for the high shrink swell potential and low strength. Cropley clay constitutes approximately 43.9 acres of the Project site and is rated with an LCC of Class IIs with irrigation and Class IIIs without irrigation. Salinas silty clay loam constitutes approximately 3.7 acres of the Project within the proposed stormwater detention basin area and is rated with an LCC of Class I with irrigation and Class IIIc without irrigation. Per NRCS designations, these soils are considered Prime Farmland if irrigated.

Table 3.2-2. Specific Plan Area Soil Capabilities

Map Symbol	Soil Name	Acreages in Project Site	Class		Important Farmland Designation ¹	Slope %	Surface Runoff
			IR	NI			
127	Cropley clay	43.8 (40.3%)	IIs	IIIs	Prime (if irrigated)	0 to 2	Medium
130	Diablo and Cibo clays	16.0 (14.7%)	IIIe	IIIe	Non-prime	9 to 15	Very high
131	Diablo and Cibo clays	7.3 (6.7%)	IVe	IVe	Non-prime	15 to 30	Very high
162	Los Osos – Diablo complex	1.8 (1.6%)	IIIe	IIIe	Non-prime	5 to 9	Very high
164	Los Osos – Diablo complex	14.5 (13.3%)	VIe	VIe	Non-prime	15 to 30	Very high
183	Obispo – Rock outcrop complex	21.8 (20.0%)	VIIe	VIIe	Non-prime	15 to 75	Very high
221	Xerets – Xerolls – Urban land complex	0.7 (0.6%)	VIII	VIII	Non-prime	0 to 15	Very high
300	Corducci – Typic Xerofluvents	2.9 (2.7%)	N/A	VIe	Non-prime	0 to 5	Very low

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

¹ 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).

Source: NRCS 2018.

Table 3.2-3. Proposed Stormwater Detention Basin Area Soil Capabilities

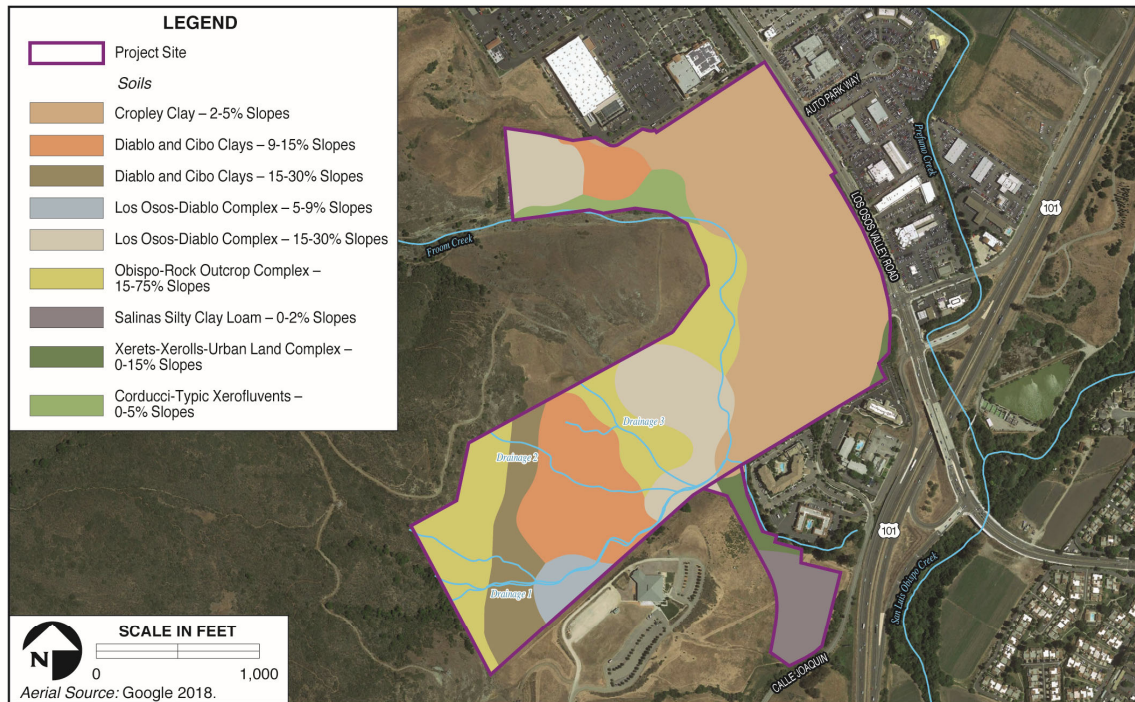
Map Symbol	Soil Name	Acreages in Project Site	Class		Important Farmland Designation ¹	Slope %	Surface Runoff	Irrigation Limitation
			IR	NI				
127	Cropley clay	0.1 (1.8%)	IIs	IIIs	Prime (if irrigated)	0 to 2	Medium	Water availability
197	Salinas silty clay loam	3.7 (62.2%)	I	IIIc	Prime (if irrigated)	0 to 2	Negligible	Water availability
221	Xerets – Xerolls – Urban land complex	2.2 (36.0%)	VIII	VIII	Non-prime	0 to 15	Very high	Water availability / well drained

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

¹ 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).

Source: NRCS 2018.

The Cropley clay soils in the Specific Plan area and proposed stormwater detention basin area, in addition to the Salinas silty clay loam soils of the proposed stormwater detention basin area, are not currently nor historically irrigated, nor have they been historically utilized for crop cultivation. However, an agricultural well exists at the Project site, which could provide a reliable source of water for irrigating these soils. As such, the Cropley clay and Salinas silty clay loam soils meet the definition of prime agricultural land under the Cortese-Knox-Hertzberg Local Government Reorganization Act (CKH Act) and are conservatively considered to be prime soils.



Agricultural Soils within the Project Site

FIGURE 3.2-2

3.2.2 Regulatory Setting

Agricultural resources are governed primarily by local jurisdictions, consistent with state law. Regulations that are directly relevant to the Project are summarized below.

3.2.2.1 State

Department of Conservation 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. Public Resources Code (PRC) Section 21060.1 defines agricultural land for the purposes of assessing environmental impacts under the FMMP. The list below provides a description of all categories mapped by the California Department of Conservation (California Department of Conservation 2016):

- **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 four 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 four years prior to the mapping date.
- **Farmland of Local Importance and Local Potential.** Farmland of importance to the local agricultural economy as determined by each county’s board of supervisors and a local advisory committee. Farmland of Local Importance is either currently producing crops, has the capability of production, or is used for the production of confined livestock. Farmland of Local Importance is land other than Prime Farmland, Farmland of Statewide Importance or Unique Farmland. In the County, the local advisory committee has elected to additionally define areas of Local Potential, which include soils that qualify for Prime Farmland or Farmland of Statewide Importance, but generally are not cultivated or irrigated. For FMMP reporting purposes, Local Potential and Farmland of Local Importance are combined in the acreage tables, but are shown separately on the Important Farmland Map.
- **Grazing Land.** Land on which the existing vegetation is suited to the grazing of livestock. It also does not include heavily brushed, timbered, excessively steep, or rocky lands that restrict the access and movement of livestock, rural residential land, or publicly owned lands for which there is an adopted policy preventing agricultural use.
- **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 non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is located 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 per the income-producing value of their property in agricultural use, rather than on the property's assessed market value. 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.

Cortese-Knox-Hertzberg Act Local Government Reorganization Act of 2000 (CKH Act)

The CKH Act was adopted in 2000 and establishes procedures for local government changes of organization, including city incorporations, annexations to a city or special district, and city and special district consolidations. The CKH Act empowers local agency formation commissions (LAFCOs) to act on local agency boundary changes and to adopt spheres of influence for local agencies with the primary purpose of discouraging urban sprawl, preserving open-space and prime agricultural lands, encouraging the efficient provision of government services, and encouraging orderly formation and development of local agencies. Under the CKH Act Section 56064, prime agricultural land is defined as an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- a) Land that qualifies, if irrigated, for rating as Class I or Class II in the USDA Natural Resources Conservation Service land use compatibility classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- b) Land that qualifies for rating 80 through 100 Storie Index Rating.
- c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.
- d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.
- a)e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.

3.2.2.2 Local

City of San Luis Obispo General Plan*Land Use Element (LUE)*

The City's adopted General Plan LUE 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 Project are listed below:

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 1.9.2 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.

Conservation and Open Space Element (COSE)

The City's adopted General Plan COSE 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 Project are listed below:

Policy 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.

County of San Luis Obispo General Plan

The County's General Plan guides land use and planning in unincorporated areas and the Agriculture Element of the County's General Plan addresses agricultural resources specifically. As the Project site is currently unincorporated, the County's General Plan currently applies and may be relevant when considering onsite, adjacent, or nearby agricultural resources.

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.

Policy 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.

San Luis Obispo County Local Agency Formation Commission (LAFCO)

The San Luis Obispo County ~~Local Agency Formation Commission~~ (LAFCO) considers annexations to cities and special districts, and, as such, would review the Project’s proposed annexation to the City. LAFCO considers the impact that a proposal may have on existing agricultural lands with focus on protecting prime agricultural lands. LAFCO has adopted specific policies regarding the preservation of agricultural resources.

2.9.12 Agricultural Policies. The Commission may approve annexations of prime agricultural land only if mitigation that equates to a substitution ratio of at least 1:1 for the prime land to be converted from agricultural use is agreed to by the applicant (landowner), the jurisdiction with land use authority. The 1:1 substitution ratio may be met by implementing various measures:

- a. Acquisition and dedication of farmland, development rights, and/or agricultural conservation easements to permanently protect farmlands within the annexation area or lands with similar characteristics within the County Planning Area.
- b. Payment of in-lieu fees to an established, qualified, mitigation/conservation program or organization sufficient to fully fund the acquisition and dedication activities stated above in 12a.
- c. Other measures agreed to by the applicant and the land use jurisdiction that meet the intent of replacing prime agricultural land at a 1:1 ratio.

2010 Open Space and Agricultural Conservation Easement Agreement

In 2010, as part of the annexation and development of the Prefumo Creek Commons project located across LOVR from the Project site, an open space and agricultural conservation easement was established over a 7.1-acre portion of the Project site to satisfy LAFCO Policy 2.9.12, *Agricultural Policies* (refer to Figure 2-2). The land within the easement was found suitable to meet the LAFCO criteria for dedication for the Prefumo Creek Commons project impacts, as it contains the same type of soils; however, the area was never cultivated, and now overlays a delineated wetland area, as described in Section 3.4, *Biological Resources*. The open space and agricultural conservation easement is intended to allow the continuation of prior historical agricultural activities on the property, including grazing and agricultural production, and otherwise restricts the use of the land from development that would not support agricultural production. Additionally, the easement agreement states that the area may be used for wetland and biological resource mitigation banking (e.g., the restoration, creation, enhancement, and/or preservation of wetlands and/or biological resources) for the purpose of providing compensation mitigation as a result of impacts to similar resources. The easement is managed by the City and may be amended with written consent of both Irish Hills Plaza, LLC and the City; LAFCO would review any proposed amendment to confirm it is in conformance with the conditions of the easement agreement.

3.2.3 Environmental Impact Analysis

3.2.3.1 Thresholds of Significance

With respect to agricultural resources, applicable sections of Appendix G of the 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 (Farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agricultural use;
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
- d) Result in the loss of forest land or conversion of forest land to non-forest use;
- e) 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.

Non-Applicable Thresholds

- Threshold (c) (*Zoning for Forest Land, Timberland, or Timberland Production*): The Project site does not contain zoning for forest land, timberland, or timberland zoned Timberland Production, nor does it propose the rezoning of any of these areas. As such, there would be no potentially significant adverse impacts related to forest- and timberland-related resources and this issue will not be analyzed further in this EIR.
- Threshold (d) (*Forest Land Conversion*): The Project site does not contain any forest land. As such, there would be no potentially significant adverse impacts related to the loss or conversion of forest land with implementation of the Project and this issue will not be analyzed further in this EIR.

3.2.3.2 Impact Assessment Methodology

Data for this analysis was derived from the review of the City's General Plan LUCE Update EIR (2014); General Plan COSE (2006); NRCS soil maps; and the FMMP San Luis Obispo Important Farmland Map (2016). Potential impacts to agricultural resources are associated with the conversion of open space lands used for grazing to urban development, including 39.1 acres of residential and 3.1 acres of retail commercial land uses, as further described below. Though the Project site is currently unincorporated land under the jurisdiction of the County, the City's LUCE Update EIR and General Plan have planned for the

annexation of the site. The potential for impacts to agricultural resources are therefore evaluated in the context of City resources and agricultural conservation policies. The LUCE Update EIR analyzed the potential for planned development of the Specific Plan area 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 LUCE policies, which require conservation of comparable agricultural resources within the San Luis Obispo Planning Area. Such policies include the dedication of offsite agricultural lands or payment of in-lieu fees to ensure that such land is conserved. In addition, the analysis below also considers the physical loss of agricultural resources and prime if irrigated soils.

The analysis for agricultural resources uses Land Evaluation and Site Assessment (LESA) methodology to determine the potential for significant ~~ee of~~ impacts, which are assessed in this section below. LESA Model estimates for the Project site are contained within Appendix L of this EIR. The following methods were also used to determine the extent and/or significance of the Project's impact on agricultural resources:

- a) Identify any onsite land classified by the FMMP with an Important Farmland designation that would be directly converted as a result of the Project.
- b) Identify any onsite prime soils that would be impacted based on the NRCS designation of prime agricultural soils. The NRCS defines prime agricultural soils as land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops.
- c) Identify onsite and offsite areas with a County agriculture land use designation that would be directly converted or would be affected by other changes in the environment that would indirectly contribute to the conversion of agricultural land as a result of the Project.

3.2.3.3 Project Impacts and Mitigation Measures

Implementation of the Project has the potential to result in direct impacts to onsite agricultural resources, including grazing land and prime soils. The Project also has the potential to result in impacts to agricultural resources based upon consistency with goals and policies within the LUE and COSE of the City's General Plan (refer also to Section 3.9, *Land Use and Planning*), and the 2010 Open Space and Agricultural Conservation Easement agreement. These impacts are further discussed below and summarized in Table 3.2-4.

Table 3.2-4. Summary of Project Impacts

Agricultural Resource Impacts	Mitigation Measures	Residual Significance
AG-1. The Project would convert onsite Farmland of Local Potential and prime soils if irrigated to non-agricultural uses.	None Required	Less than Significant
AG-2. Implementation of the Project would create potential conflicts with existing agricultural zoning.	None Required	Less than Significant
AG-3. The Project would adjust the boundary of an existing open space and agricultural conservation easement to a location that would reduce the viability of agricultural operations within the recorded easement.	None Required	Less than Significant

Impact AG-1 The Project would convert onsite Farmland of Local Potential and prime soils if irrigated to non-agricultural uses. (Less than Significant).

The Project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency (see also, Figure 3.2-1 and City General Plan COSE, Figure 10). Per the City General Plan COSE Figure 10, *Prime Agricultural Soils*, the Project site contains areas mapped as Farmland of Local Potential. Therefore, the Project would not convert FMMP-designated Important Farmland. The Project site contains 46.2 acres of FMMP-designated Grazing Land, which has vegetation suited to grazing livestock, and 67.6 acres of FMMP-designated Farmland of Local Potential, which are potentially suitable for farmland but are not currently, and have not historically been, cultivated or irrigated. Implementation of the Project would result in the conversion of approximately 15.1 acres of Grazing Land (primarily within the Upper Terrace of the Project site) and 47.0 acres of Farmland of Local Potential (primarily within Lower Area and Madonna Froom Ranch) to developed urban uses. The loss of Grazing Land and Farmland of Local Potential is not considered a significant impact under CEQA, nor under the City’s General Plan LUE.

The Project site contains approximately 43.9 acres of Cropley clay and 3.7 acres of Salinas silty clay loam soils (total 47.6 acres), which are considered to be prime soils if irrigated. Though not currently irrigated, available water supplies exist to support irrigation of these soils, including an existing well onsite. As such, these soils could be considered prime under NRCS classifications and prime agricultural land under the City’s General Plan if water sources were used to irrigate the land for crop cultivation. However, no portion of the Project site is currently irrigated and there is no history of irrigated crop production

within the Project site. A California Agricultural Land Evaluation and Site Assessment (LESA) Model was prepared for the Project, resulting in a scoring decision of less than significant (Table 3.2-5). 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).

LESA scores for the Project site (including the offsite stormwater basin) are summarized in Table 3.2-5 below. A final score of 44.26 with an SA score below 20 indicates the Project impacts to existing agricultural soils would be less than significant.

Table 3.2-5. Final LESA Score Sheet

	Factor Scores	Factor Weight (%)	Weighted Factor Scores	
Land Evaluation Factors				
Land Capability Classification	<1>	52.79	25	13.2
Storie Index	<2>	51.22	25	12.81
Subtotal			50	26.01
Site Assessment Factors				
Project Size	<3>	80	15	12
Water Resource Availability	<4>	25	15	3.75
Surrounding Agricultural Land	<5>	0	15	0
Protected Resource Land	<6>	50	5	2.5
Subtotal			50	18.25
Final Score				44.26
Significance Determination			Less than Significant	

Source: Appendix L.

The Project would also be required to comply with LAFCO Policy 2.9.12, *Agricultural Policies*, which provides that ~~the Commission~~ LAFCO may approve annexations of prime agricultural land only if mitigation that equates to a substitution ratio of at least 1:1 for the prime land to be converted from agricultural use is agreed to by the applicant (landowner), the jurisdiction with land use authority. The Project is subject to the annexation approval jurisdiction of LAFCO and would be required to comply with LAFCO Policy 2.9.12 before LAFCO can approve annexation of the Project site into the City. In compliance with this policy, LAFCO will require the Applicant to provide a substitution ratio of at least 1:1 for the prime soils to be converted from agricultural under the Project. As described in Section 3.2.2, *Regulatory Setting*, the 1:1 substitution may be met by (1) acquisition and dedication of farmland, development rights, and/or conservation easements to permanently protect farmlands within the annexation area or lands with similar characteristics within the County Planning Area; (2) payment of in-lieu fees to an established, qualified, mitigation/conservation program or organization sufficient to fully fund the acquisition and dedication stated above (in item [1]); or (3) other measures agreed by the Applicant and the land use jurisdiction that meet the intent of replacing prime agricultural land at a 1:1 ratio. Refer to EIR pages 3.2-12 and 3.2-13.

Existing regulations will require the Project to comply with these agricultural policies as a prerequisite to LAFCO's approval of the requested annexation. Therefore, affected onsite prime soils will be required to be mitigated at a 1:1 ratio through one (or a combination of) the agricultural substitution requirements stated above. Further, a portion of the prime agricultural soils onsite (approximately 7 acres) currently support established jurisdictional wetlands (e.g., in the 5.81-acre Calle Joaquin wetlands). Direct impacts to these areas would be avoided to the greatest extent feasible and these areas are proposed to be permanently protected for habitat/open space use through amendment of the onsite agriculture and open space easement. Impacts to these prime agricultural soils would be avoided and these areas would be permanently protected, consistent with LAFCO's policies.

In addition, the Project includes a total of 59.0 acres of open space, including 38.9 acres within Villaggio and 20.1 acres within Madonna Froom Ranch, the majority of which would be preserved within the Upper Terrace. The Upper Terrace area supports only grazing land along with a wide variety of sensitive biological resources. The Lower Area of Villaggio and Madonna Froom Ranch contain the prime soils (if irrigated) that would be affected by the Project, including both development and preservation with designated open space areas; however, the Project site does not currently (and has not historically)

supported irrigated row crops or other intensive agricultural uses and is not irrigated. The site is currently used for horse grazing and has not otherwise been used for agricultural production purposes. The preservation of onsite wetlands and the unique and highly sensitive biological resources in the Upper Terrace as designated open space provide a substantial public benefit by protecting and preserving grazing lands and the highest quality natural resources within the Specific Plan area and may, in part, meet the intent of LAFCO's agricultural policies.

As the Project moves through the approval process, the City will be required to ensure the Project is consistent with the Cortese-Knox-Hertzberg Act, LAFCO policies, and City policies related to the protection of prime farmland. This will include ensuring conversion of agricultural soils has been achieved at a 1:1 ratio, either onsite, offsite, or through compensatory mitigation, consistent with the LAFCO policy stated above and through the City annexation process. This could be achieved through permanent protection of onsite resources described above and/or a combination of additional offsite agricultural lands at a minimum of a 1:1 ratio.

The Project would not convert Important Farmland (as defined by the FMMP of the California Resources Agency) and conversion of ~~or~~ prime agricultural soils (per the definition in the Cortese-Knox-Hertzberg Act) due to lack of historic or current irrigation), and is not considered a significant conversion of land per the California Agricultural LESA Model. Nevertheless, pPer LAFCO policy, loss of these prime agricultural soils, ~~if irrigated,~~ would be required to be mitigated at a 1:1 ratio through the Project's annexation process. Therefore, the loss of this resource through development of the Project is considered *less than significant*.

Impact AG-2 Implementation of the Project would create potential conflicts with existing agricultural zoning (Less than Significant).

The Project site currently contains land within the Agriculture and Rural Lands land use designations within the County and Commercial Retail land use within the City and supports some limited grazing uses, historic structures utilized to support a construction business, and an active permitted rock quarry. Currently, the Specific Plan area is leased for horse grazing; the proposed stormwater detention basin area is vacant and not used for agricultural activities. Upon Project approval, the Specific Plan area would be designated for residential, commercial/retail, and parks/open space uses within the City. The proposed residential, commercial/retail, and public park land uses would convert more rural uses to urban uses and eliminate existing grazing uses. The Project site is planned for urban

development with a Specific Plan (SP-3) land use designation under the City's LUE and the Project would be consistent with Policy 1.7.3, *Interim Uses*, where grazing uses would continue until urban development occurs under a Specific Plan.

There are parcels within the Agriculture and Rural Lands designations within the County adjacent to the Project site to the west and south. However, none of the immediately adjacent lands currently support agricultural uses, including cultivation or grazing. Instead, adjacent agricultural parcels contain open space within conservation easements and Mountainbrook Church. In the vicinity, agriculturally zoned lands exist within 0.25 mile of the Project site on the east side of U.S. 101, which are currently in active agricultural production (row crops). Further to the south, some of these agricultural parcels are subject to Williamson Act contracts. However, agricultural parcels within 0.5 mile of the Project site are separated from the Project site by the existing urban development, such as the Irish Hills Plaza, hotels, and Mountainbrook Church, as well as non-agricultural open space areas, such as the Irish Hills Natural Reserve. This substantial distance and developed buffer would prevent indirect impacts of the Project on existing agriculturally zoned parcels or existing agricultural operations in the Project vicinity.

Development of the Project site would convert 116.8 acres of Agriculture, Rural Lands, and Commercial Retail designated land uses to urban uses. This includes 59.0 acres of Agriculture and Rural Lands designated land use that would be annexed and re-designated as Open Space under the Project, making these areas not suitable for agricultural uses in the future. However, the site is planned for urban development, park land, and open space consistent with the City's General Plan. Therefore, impacts would be adverse, but *less than significant*.

Impact AG-3 The Project would adjust the boundary of an existing open space and agricultural conservation easement to a location that would reduce the viability of agricultural operations within the recorded easement (Less than Significant).

The 7.1-acre open space and agricultural conservation easement was established onsite in 2010 based on LAFCO Policy 2.9.12 and requires that the land within the easement be capable of retaining historical onsite agricultural operations, and/or provide open space and biological resource value, such as wetlands. The easement currently encircles a contiguous block of land with soils that are prime if irrigated within the southeast area of the Project site. The Project would adjust the boundary of the 7.1-acre easement (refer to Figure 2-4). The proposed easement boundary adjustment would retain a total of 7.1 acres of land;

however, the dedicated area would be divided into two isolated areas. Approximately 5.5 acres of the proposed reconfigured easement area would be located west of Calle Joaquin, while approximately 1.6 acres would be located east of Calle Joaquin.

To comply with LAFCO requirements and the 2010 Open Space and Agricultural Conservation Easement agreement, the proposed adjusted easement would need to support historical agricultural operations, including existing grazing uses, or allow for conservation of biological resources, including wetlands. Adjustment of the existing easement boundary would effectively reduce the extent of lands dedicated to grazing uses from 7.1 acres to 5.5 acres, as livestock would not have the ability to access or utilize the 1.6-acre portion east of Calle Joaquin. This effective reduction would also reduce the viability of existing grazing operations or other agricultural operations to occur within the 5.5-acre portion of the adjusted easement. However, realignment of the easement would support conservation of habitat and biological resources, particularly the protection of existing wetlands within this 1.6-acre portion east of Calle Joaquin, which is consistent with the terms of the easement. Thus, adjustment of the 7.1-acre easement would continue to meet the objectives and LAFCO requirements of the 2010 Open Space and Agricultural Conservation Easement agreement and this impact is considered *less than significant*.

3.2.3.4 Cumulative Impacts

Implementation of the Project would contribute incrementally to the loss of agricultural land (Grazing Land and Farmland of Local Potential) to development within the County and particularly within the City's Sphere of Influence. Although agricultural resources in the Project vicinity are predominantly located outside of City limits, agriculture is a major industry in the County. The 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 2012 and 2014, the FMMP recorded a net loss of 10,706 acres of Important Farmland. However, between 2014 and 2016, FMMP reports indicate that this trend in conversion of agricultural resources to development uses began to reverse, and approximately 1,758 acres of Important Farmland were gained (California Department of Conservation, Division of Land Resource Protection 2012, 2014, 2016). In addition, within the City, projects such as the San Luis Ranch Specific Plan and Avila Ranch Development Plan would result in the conversion of over 200 acres of agricultural land to urban uses in the Project vicinity.

The Project would not contribute to the loss of Important Farmland. Consistent with the LUCE Update EIR, the Project would implement mitigation measures to ensure

compliance with the goals and policies of the General Plan. Similar to the Project, other cumulative development within the City that would result in the conversion of agricultural resources would be subject to Policy 1.9.2 in the LUE, Prime Agricultural Land, and Policy 8.6.3 in the COSE, Required Mitigation. However, cumulative development would continue to result in the irreversible loss of agricultural resources. The Project would result in the incremental loss of agricultural resources within the County, including the loss of Grazing Lands and loss of Farmland of Local Potential, per the FMMP. The County has experienced a net gain of 8,117 acres of Grazing Land between 2010 and 2016 (California Department of Conservation, Division of Land Resource Protection 2014; 2012; 2016). However, the Project site does not contain prime agricultural resources per the FMMP, current soil classifications, or the California Agricultural LESA Model, nor would it contribute to the loss of prime agricultural land within the County. Therefore, the Project's cumulative contribution to loss of agricultural resources would be *less than significant*.