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Project No: 15-02100

Wyatt Banker-Hix
Engineer III
City of San Luis Obispo, Department of Public Works
919 Palm Street, San Luis Obispo, CA 93401
Via email: wbanker@slocity.org

Subject: Farmland Conversion Impact Rating, U.S. 101/Prado Road Interchange Connection Project in San Luis Obispo, California

Dear Mr. Banker-Hix:

This memorandum evaluates the project site based on criteria outlined in the Farmland Conversion Impact Rating forms for compliance with the Farmland Protection Policy Act (FPPA). The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) maintains two forms to assess potential farmland conversion impacts: the AD-1006 and NRCS-CPA-106. While similar in nature, the NRCS-CPA-106 is suited for corridor type projects, such as those pertaining to transportation or flood control systems. Given the nature of this project and after consultation with NRCS staff, the NRCS-CPA-106 form was determined to be the best fit for analyzing potential farmland conversion impacts associated with the U.S. 101/Prado Road Interchange Connection Project.

This analysis evaluates farmland conversion impacts associated with Alternatives A1, A3, A4, and A7. On the accompanying NRCS-CPA-106 form, these alternatives are referred to as Corridor A, Corridor B, Corridor C, and Corridor D, respectively. The NRCS-CPA-106 form allows listing of up to four alternative corridor alignments. Consequently, Alternatives A1R and A4R are not included in the analysis, as these alternatives are only slight variations on Alternatives A1 and A4, and the area of farmland impacts does not differ.

The project site, as delineated in site plans, would cover up to approximately 47.9 acres, depending on the alternative selected. The project site includes Prado Road east of U.S. 101, realignment of Elks Lane east of U.S. 101, reconfiguration of the U.S. 101 northbound on- and off-ramps at Prado Road, the proposed Prado Road overcrossing at U.S. 101, the extension of Prado Road west of U.S. 101 to the future From Ranch Road/Dalidio Drive intersection, and an auxiliary lane along northbound U.S. 101 from the Prado Road on-ramp to the Madonna Road off-ramp.

The portion of the project site underlying the proposed extension of Prado Road west of U.S. 101 is currently in agricultural use. This portion of the project site is part of the 131-acre San Luis Ranch property, of which 53 acres is currently in agricultural production. In July 2017, the City of San Luis Obispo approved the San Luis Ranch Specific Plan project, which would involve residential, commercial, agricultural, and open space development on the 131-acre Specific Plan area. Under the San Luis Ranch Specific Plan, approximately 53 acres of the property would remain in agricultural production. The U.S. 101/Prado Road Interchange Connection Project would result in a direct conversion of approximately 1.25 acres of farmland on the San Luis Ranch property. The extension of Prado Road may also impair



farm equipment access to an approximately 4-acre portion of farmland between the Prado Road extension and U.S. 101 that would be separated from the remaining contiguous agricultural land by construction of the public roadway. For the purposes of this analysis, this area was assumed to result in an indirect farmland conversion. The project may result in the direct conversion of approximately 2.60 acres of existing prime agricultural land to transportation use to accommodate the realignment of Elks Lane northeast of the Sunset Drive-In property. In total, the project would result in the conversion of up to approximately 7.85 acres of prime farmland, including 5.25 acres of prime farmland on the San Luis Ranch property, or approximately 4 percent of the 131-acre San Luis Ranch property.

CPA-106 Corridor Assessment Criteria

Part 523 of the Conservation Programs Manual serves as the Farmland Protection Policy Act Manual and provides guidance regarding completion of AD-1006 and NRCS-CPA-106 forms (NRCS 2012). The NRCS-CPA-106 form criteria, as explained in 7 CFR 658.5(c), are assessed below:

1. *How much of the land is in nonurban use within a radius of 1.0 mile from where the project is intended?*

The Farmland Protection Policy Act Manual Subpart G (hereinafter, “the Manual”) defines nonurban and urban land for the purposes of completing the Farmland Conversion Impact Rating analysis. Table 1 describes examples of urban and nonurban land according to the Manual.

Table 1 Nonurban and Urban Land Uses

Nonurban Land	Urban Land
Agricultural land (crops, fruit trees, nuts, oilseed)	Houses (other than farmhouses)
Rangeland	Apartment buildings
Forest land	Commercial buildings
Golf courses	Industrial buildings
Nonpaved parks and recreational areas	Paved recreational areas (i.e., tennis courts)
Mining sites (Surface Mining Control and Reclamation Act of 1977 (Public Law 95-87) exempted from FPPA)	Streets in areas with 30 structures per 40 acres
Farm storage	Gas stations
Lakes, ponds, and other water bodies	Equipment and supply stores
Rural roads and through roads without houses or buildings	Off-farm storage
Open space	Processing plants
Wetlands	Shopping malls
Fish production	Utilities and services
Pasture or hayland	Medical buildings

Source: Farmland Protection Policy Act Manual - Subpart G (NRCS 2012)

Google Earth aerial imagery and the City of San Luis Obispo zoning map (City of San Luis Obispo 2015) were used to identify land uses within one mile of the project site, which is located in a relatively urbanized portion of the City of San Luis Obispo. For the purposes of this analysis, nonurban land within a one-mile radius of the project site includes the South Hills Open Space, San Luis Ranch property, Laguna Lake Park, a riparian corridor along San Luis Obispo Creek, and agricultural, open space, and



undeveloped areas east of the project site along Prado Road and Tank Farm Road. The remainder of the area constitutes urban land. In total, approximately 45 percent of the land within a one-mile radius of the project site is in nonurban use. In accordance with the points table provided in the Manual, projects with 45-49 percent nonurban land within a one-mile radius receive **6 points**. Therefore, the project receives 6 points.

2. How much of the perimeter of the site borders on land in nonurban use?

The perimeter of the project site varies for each alternative, ranging from approximately 11,400-15,200 feet. However, only the portions of the site accompanying the proposed Prado Road extension west of U.S. 101 and the realignment of Elks Lane northeast of the Sunset Drive-In property border land in nonurban use. The perimeter of these areas is approximately 1,700 feet under each of the alternatives. Therefore, approximately 11-15 percent of the perimeter of the site borders nonurban land. In accordance with the points table provided in the Manual, the project receives **0 points** because less than 20 percent of the perimeter of the site borders nonurban land.

3. How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than 5 of the last 10 years?

The area of the project site varies for each alternative, up to approximately 47.9 acres. Of this area, only the portions of the site underlying the proposed Prado Road extension west of U.S. 101 and the realignment of Elks Lane northeast of the Sunset Drive-In property are in agricultural production. The portion of the site underlying the proposed Prado Road extension west of U.S. 101 totals approximately 1.25 acres under each alternative, which is approximately 2.5 percent of the project site. The portion of the site underlying the realignment of Elks Lane northeast of the Sunset Drive-In property totals approximately 2.60 acres under Alternatives A1, A3, and A7, which is approximately 5.4 percent of the project site. Therefore, less than 20 percent of the project site has been farmed more than 5 of the last 10 years. In accordance with the points table provided in the Manual, the project receives **0 points**.

4. Is the site subject to State or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

The project site is located in a portion of the City of San Luis Obispo that is largely urbanized but contains some farmland. Much of the project site is an existing roadway, with the majority of adjacent parcels zoned for public facilities, offices, and commercial space. However, the portion of the project site associated with the proposed Prado Road extension west of U.S. 101 to Dalidio Drive is located on the San Luis Ranch property. The portion of the site underlying the realignment of Elks Lane northeast of the Sunset Drive-In property is located on agriculturally-zoned property currently in use for row crop production. Both these areas are designated as Prime Farmland under the City of San Luis Obispo General Plan Conservation and Open Space Element (City of San Luis Obispo 2015) and the 2016 San Luis Obispo County Important Farmland Map from the Farmland Mapping and Monitoring Program (FMMP) (California Department of Conservation 2018). As such, a portion of the project site is subject to State and local government policies or programs to protect farmland. In accordance with the guidelines in the Manual, the project receives **20 points** because the project site is covered by at least one program or policy to protect farmland.



5. *Are the farm units containing the site (before the project) as large as the average-size farming unit in the county? (Average farm sizes in each county are available from the NRCS field offices in each state. Data are from the latest available Census of Agriculture, Acreage of Farm Units in Operation with \$1,000 or more in sales.)*

According to the Census of Agriculture County Summary Highlights: 2017, the average size of farms in San Luis Obispo County was 396 acres (National Agricultural Statistics Service 2017). The portion of the project site situated on agricultural land west of U.S. 101 is located on the 131-acre San Luis Ranch property, of which approximately 53 acres remain in agricultural production. The portion of the project site situated on agricultural land northeast of the Sunset Drive-In property is located on an approximately 12.5-acre property. Therefore, the affected agricultural properties are smaller than the average farm size in San Luis Obispo County. In accordance with the guidelines in the Manual, the project receives **0 points** because the property on which the agricultural land is located is less than 50 percent of the County's average farm size.

6. *If this site is chosen for the project, how much of the remaining land on the farm will become non-farmable because of interference with land patterns?*

The project would involve extension of Prado Road to the future Froom Ranch Road/Dalidio Drive intersection west of U.S. 101. This component of the project remains consistent across all project alternatives. The extension of Prado Road may impair farm equipment access to approximately 4 acres of farmland located between the proposed Prado Road extension and U.S. 101 by constructing a paved, public roadway, resulting in an indirect conversion of remaining farmland. The area that may be indirectly converted is slated for development with Neighborhood Commercial land uses under the approved San Luis Ranch Specific Plan. This area accounts for approximately 3 percent of the 131-acre San Luis Ranch property, or approximately 7.5 percent of the remaining area in agricultural production. Therefore, in accordance with the guidelines in the Manual, the project receives **4 points** because approximately 7.5 percent of the remaining land on the San Luis Ranch property would become non-farmable.

7. *Does the site have available adequate supply of farm support services and markets (i.e., farm suppliers, equipment dealers, processing and storage facilities, and farmer's markets)?*

The area in which the project is located is well-served by agricultural suppliers and equipment dealers in San Luis Obispo, within one mile of the project site. Additionally, the region is served by a number of farmer's markets in San Luis Obispo, Arroyo Grande, and Morro Bay. The project site is located in a region with agriculture-compatible land uses. In accordance with the points table in the Manual, the project receives **5 points** because all agricultural support services are available.

8. *Does the site have substantial and well-maintained on-farm investments such as barns, other storage buildings, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?*

The portion of the project site currently in agricultural production does not show visible substantial and well-maintained on-farm investments. The site does not have fruit trees or vines. However, the site may have irrigation, drainage, or conservation improvements that are not visible on aerial imagery. Additionally, a barn and storage buildings are located on the San Luis Ranch property, approximately 0.25 mile from the project site. Therefore, given the proximity of on-farm investments and the potential for other investments to be present on the project site, the site was conservatively assumed to have 50 percent of on-farm investments. In accordance with the points table provided in the Manual, projects with 50-54 percent of on-farm investments are to receive **10 points**. Therefore, the project receives 10 points.



9. *Would the project at this site, by converting farmland to nonagricultural use, reduce the demand for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?*

The project would result in up to 3.85 acres of farmland directly converted, and up to 4 acres of farmland indirectly converted due to impaired farm equipment access resulting from construction of the public roadway. In total, this area accounts for approximately 12 percent of the existing farm located on or adjacent to the project site, and a less than substantial percentage of the approximately 931,291 acres of farmland in San Luis Obispo County (National Agricultural Statistics Service 2017). In accordance with the guidelines provided in the Manual, the project receives **0 points** because the project would not result in a significant reduction in demand for farm support services in the area.

10. *Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of surrounding farmland to nonagricultural use?*

The project is a roadway interchange and would create a connection along Prado Road over U.S. 101. The project itself does not propose any residential, commercial, or other land uses that would be incompatible with existing agricultural use of surrounding farmland. However, the Prado Road/U.S. 101 overpass and interchange is a mitigating component of the San Luis Ranch Specific Plan project, which proposes commercial, residential, and open space development on the 131-acre San Luis Ranch property. The Specific Plan has converted approximately 56 of the 109 acres of agricultural land on the property to nonagricultural land uses. Remaining agricultural land on the property are planned to remain in agricultural production. Therefore, while the project does not propose land uses that would be incompatible with agriculture, the project would contribute to the eventual conversion of surrounding farmland to nonagricultural use by enabling future residential and commercial development on the San Luis Ranch property.

In accordance with the guidelines provided in the Manual, projects that are tolerable of existing agricultural use of surrounding farmland but not fully compatible should be assigned anywhere from 1 to 9 points based on the potential for subsequent farmland conversion. Under the San Luis Ranch Specific Plan, approximately 51 percent of the existing agricultural land on the San Luis Ranch property has been converted to developed uses enabled by the project. Therefore, the project receives **5 points**, commensurate with its potential farmland conversion impacts on the San Luis Ranch property.

Conclusion

The above analysis was used to complete Part VI – Corridor Assessment Criteria. While the perimeters and areas of each alternative corridor vary somewhat, they do not vary enough to substantially affect factors such as percentage of the corridor farmed, percentage of perimeter bordering nonurban land uses, etc. As a result, each alternative received the same score on the NRCS-CPA-106 form. Based on the above assessment, the project would receive a Total Corridor Assessment score of **50/160 points**. A NRCS-CPA-106 form with Part VI completed is attached to this memorandum.

Sincerely,

Chris Bersbach, MESM
Senior Project Manager



References

- California Department of Conservation. 2018. San Luis Obispo County Important Farmland Map, 2016. Map published February 2016. 1:120,000. Sacramento, California. Available at:
<https://www.conservation.ca.gov/dlrp/fmmp/Pages/SanLuisObispo.aspx>
- City of San Luis Obispo. 2015. *City of San Luis Obispo Zoning Map*. San Luis Obispo, CA. January 2015.
- _____. 2015. City of San Luis Obispo General Plan. May 2015. Available at:
<http://www.slocity.org/home/showdocument?id=6703>
- Natural Resources Conservation Service (NRCS). 2012. *Conservation Programs Manual – Part 523: Farmland Protection Policy Act Manual*. August, 2012.
https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1049240.pdf
- National Agricultural Statistics Service. 2017. Census of Agriculture – County Summary Highlights: 2017. Accessed August 4, 2021.
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**FARMLAND CONVERSION IMPACT RATING
FOR CORRIDOR TYPE PROJECTS**

PART I (To be completed by Federal Agency)		3. Date of Land Evaluation Request	4. Sheet 1 of _____
1. Name of Project U.S. 101/Prado Road Interchange Connection		5. Federal Agency Involved Federal Highway Administration	
2. Type of Project Corridor (interchange, roadway connection)		6. County and State San Luis Obispo County, California	
PART II (To be completed by NRCS)		1. Date Request Received by NRCS	2. Person Completing Form
3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form). YES <input type="checkbox"/> NO <input type="checkbox"/>		4. Acres Irrigated Average Farm Size	
5. Major Crop(s)	6. Farmable Land in Government Jurisdiction Acres: _____ % _____		7. Amount of Farmland As Defined in FPPA Acres: _____ % _____
8. Name Of Land Evaluation System Used	9. Name of Local Site Assessment System	10. Date Land Evaluation Returned by NRCS	

PART III (To be completed by Federal Agency)	Alternative Corridor For Segment <u>Prado Road</u>			
	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres To Be Converted Directly	3.85	3.85	1.25	3.85
B. Total Acres To Be Converted Indirectly, Or To Receive Services	4	4	4	4
C. Total Acres In Corridor	47.9	47.9	44.3	47.9

PART IV (To be completed by NRCS) Land Evaluation Information				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide And Local Important Farmland				
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value				

PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)				
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PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))	Maximum Points				
1. Area in Nonurban Use	15	6	6	6	6
2. Perimeter in Nonurban Use	10	0	0	0	0
3. Percent Of Corridor Being Farmed	20	0	0	0	0
4. Protection Provided By State And Local Government	20	20	20	20	20
5. Size of Present Farm Unit Compared To Average	10	0	0	0	0
6. Creation Of Nonfarmable Farmland	25	4	4	4	4
7. Availability Of Farm Support Services	5	5	5	5	5
8. On-Farm Investments	20	10	10	10	10
9. Effects Of Conversion On Farm Support Services	25	0	0	0	0
10. Compatibility With Existing Agricultural Use	10	5	5	5	5
TOTAL CORRIDOR ASSESSMENT POINTS	160	50	50	50	50

PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)	100	0	0	0	0
Total Corridor Assessment (From Part VI above or a local site assessment)	160	50	50	50	50
TOTAL POINTS (Total of above 2 lines)	260	50	50	50	50

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>
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5. Reason For Selection:

Signature of Person Completing this Part: _____ DATE _____

NOTE: Complete a form for each segment with more than one Alternate Corridor

CORRIDOR - TYPE SITE ASSESSMENT CRITERIA

The following criteria are to be used for projects that have a linear or corridor - type site configuration connecting two distant points, and crossing several different tracts of land. These include utility lines, highways, railroads, stream improvements, and flood control systems. Federal agencies are to assess the suitability of each corridor - type site or design alternative for protection as farmland along with the land evaluation information.

(1) How much land is in nonurban use within a radius of 1.0 mile from where the project is intended?

More than 90 percent - 15 points
90 to 20 percent - 14 to 1 point(s)
Less than 20 percent - 0 points

(2) How much of the perimeter of the site borders on land in nonurban use?

More than 90 percent - 10 points
90 to 20 percent - 9 to 1 point(s)
Less than 20 percent - 0 points

(3) How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than five of the last 10 years?

More than 90 percent - 20 points
90 to 20 percent - 19 to 1 point(s)
Less than 20 percent - 0 points

(4) Is the site subject to state or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

Site is protected - 20 points
Site is not protected - 0 points

(5) Is the farm unit(s) containing the site (before the project) as large as the average - size farming unit in the County ?

(Average farm sizes in each county are available from the NRCS field offices in each state. Data are from the latest available Census of Agriculture, Acreage or Farm Units in Operation with \$1,000 or more in sales.)

As large or larger - 10 points
Below average - deduct 1 point for each 5 percent below the average, down to 0 points if 50 percent or more below average - 9 to 0 points

(6) If the site is chosen for the project, how much of the remaining land on the farm will become non-farmable because of interference with land patterns?

Acreage equal to more than 25 percent of acres directly converted by the project - 25 points
Acreage equal to between 25 and 5 percent of the acres directly converted by the project - 1 to 24 point(s)
Acreage equal to less than 5 percent of the acres directly converted by the project - 0 points

(7) Does the site have available adequate supply of farm support services and markets, i.e., farm suppliers, equipment dealers, processing and storage facilities and farmer's markets?

All required services are available - 5 points
Some required services are available - 4 to 1 point(s)
No required services are available - 0 points

(8) Does the site have substantial and well-maintained on-farm investments such as barns, other storage building, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?

High amount of on-farm investment - 20 points
Moderate amount of on-farm investment - 19 to 1 point(s)
No on-farm investment - 0 points

(9) Would the project at this site, by converting farmland to nonagricultural use, reduce the demand for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?

Substantial reduction in demand for support services if the site is converted - 25 points
Some reduction in demand for support services if the site is converted - 1 to 24 point(s)
No significant reduction in demand for support services if the site is converted - 0 points

(10) Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of surrounding farmland to nonagricultural use?

Proposed project is incompatible to existing agricultural use of surrounding farmland - 10 points
Proposed project is tolerable to existing agricultural use of surrounding farmland - 9 to 1 point(s)
Proposed project is fully compatible with existing agricultural use of surrounding farmland - 0 points
