

4.6 AGRICULTURAL RESOURCES

Project implementation would result in the conversion of 60 acres of prime agricultural land to general retail, office/business park, and infrastructure uses. Impacts related to the loss of such agriculturally-suitable land would be significant and unavoidable (Class I). However, it should be noted that the applicant would acquire an open space easement over 20 acres of off-site agricultural land of similar soil type. Potential impacts related to land use conflicts between proposed development and adjacent agricultural uses would be significant but mitigable (Class II).

4.6.1 Setting

a. Regional Agricultural Resources. California was the leading state in agricultural production in the United States for 2000 and San Luis Obispo County consistently ranks within the top 20 counties in overall state agricultural productivity. A steady increase in San Luis Obispo County crop values has occurred in recent years.

Agriculture makes a substantial contribution to the county economy and accounts for approximately 80% of the privately-owned land in the county. Total agricultural production valuations from 1992 to 2001 have increased from approximately \$278 million to \$490 million. The top five crops, by value in San Luis Obispo County in 2001 included: wine grapes (\$138 million), cattle and calves (\$43 million), broccoli (\$36 million), head lettuce (\$30 million), and indoor decorative (\$27 million) (San Luis Obispo County Department of Agriculture, 2001 Annual Report, 2001). The gross value of agricultural production is multiplied by a factor of two to three times through the local economy due to the involvement of other sectors of the economy, including industry, retail trade and commercial services. The County has become an increasingly important wine-making region, and the trend of the 1990s to convert ranchlands to vineyards continues.

b. Dalidio Property Agricultural Resources.

Agricultural Uses. Approximately 109 acres of the 131 acre project site are used for the production of irrigated row crops including celery, broccoli, lettuce, oriental vegetables, and peas. A vegetable packing facility, storage areas, Prefumo Creek watershed drainages, and eucalyptus trees occupy about 22 acres that have little or no agricultural production value at this time. The packing facility is used to process locally grown crops and the storage areas primarily store agricultural equipment. Crops grown on the site are packed in the field. On any given year various combinations of row crops may be grown on the site and on the adjacent property south of the site. Irrigation water availability is considered good according to the cropland lessee. Currently, the site is farmed in combination with the property directly to the south.

The current crop production areas are separated by at least 100 to 300 foot wide buffers from adjacent residential, commercial and post office uses. The residential areas are separated from the cropland by a riparian and eucalyptus corridor, a barbed wire fence, and a farm access road along Prefumo Creek. According to the cropland lessee, the only problem with farming the site stems from concern for children playing in the tree area adjacent to the farm fields. However, project site owner Ernie Dalidio has expressed concern over the viability of continuing to farm the site considering its close proximity to urban uses. Specifically, in a September 21, 1999



article in The San Luis Obispo Telegraph-Tribune, Mr. Dalidio expressed his opinion that urban farming does not work due to the incompatibilities between urban development and agricultural practices, particularly the aerial spraying of pesticides and the burning of crops.

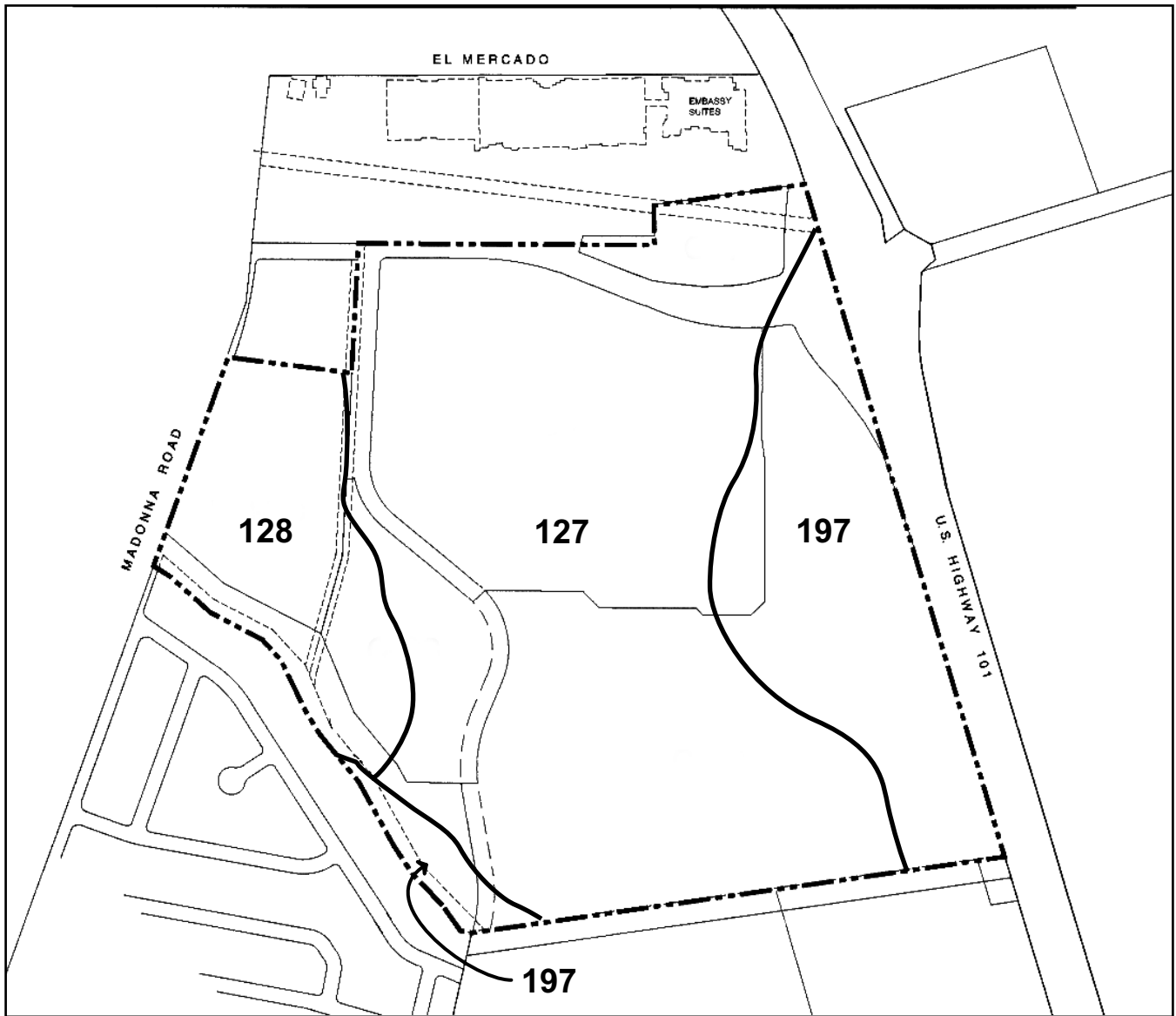
The shopping center and hotel north of the site are separated from the cropland area by a farm access road, Dalidio Road, and a parking lot. The postal facility building to the northwest is separated from the cropland area by a farm access road, a drainage swale, and a postal parking lot. The San Luis Obispo County agricultural Commissioner's Office has not received complaints regarding farming practices and pesticide uses on the site. Pesticides used on-site are applied by ground spraying.

Soils and Crop Production. Three soils types are found on the project site as shown on Figure 4.6-1. The Capability Class II (irrigated) Cropley clay comprises about 83 acres, and the Capability Class I (irrigated) Salinas silty clay loam occupies about 26 acres of crop production land. Total irrigated crop production is about 109 acres. These 109 acres are considered prime agricultural land due to their Capability Class I and II rating and their high average gross revenues. According to a 1997 Agricultural Production Report published by the San Luis Obispo County Agricultural Commissioner's Office, row crops in San Luis Obispo County yield about \$4,000 per acre for county row crop land (note: \$200.00 per acre or greater gross revenue qualifies as prime). These soils are also designated as prime by the California Department of Conservation Important Farmlands Mapping Program.

The USDA National Agricultural Land Evaluation and Site Assessment (LESA) methodology for cropland takes into account factors such as land capability, soil productivity, Important Farmland classification, slope, irrigation water availability, crop productivity, and site acreage. These factors suggest that the project site has a high agricultural viability for cropland production. The Cropley clay soil is constrained by seasonal wetness due to the slow surface runoff, which reduces the ability to farm when the ground is wet. The Salinas silty clay loam soil has no constraints related to crop production. Characteristics of the soil types found on the project site are described in Table 4.6-1.

The remaining three acres of Salinas soil are within the creek and bank area of Prefumo Creek and have limited agricultural production value. The 19 acres of Cropley clay presently used for the packing facility, storage areas, eucalyptus groves, and drainage areas have little or no agricultural production value.

c. Prado Road Interchange Footprint Agricultural Resources. The Prado Road interchange footprint area is primarily within Caltrans right-of-way, with the exception of the area near the proposed freeway ramps and the realigned Elks Lane. Adjacent to U.S. Highway 101, but outside of the Caltrans right-of-way, about 550 feet north of the Prado Road/U.S. Highway 101 intersection is an approximately 0.25 acre area currently being used for production of agricultural row-crops. This parcel is currently zoned C/OS, Conservation/Open Space with a General Plan designation of Open Space. The proposed auxiliary lane would not extend onto this property.



SOURCES: Cannon Associates
USDA Soil Survey for San Luis Obispo County, 1985



LEGEND

- 127 CROPLEY CLAY
- 128 CROPLEY CLAY
- 197 SALINAS SILTY CLAY LOAM

Soil Types at the Dalidio Property

Figure 4.6-1



Section 4.6 Agricultural Resources

Table 4.6-1 Soil Characteristics at the Dalidio Property

Map #	Soil Name	Texture	Slope %	Capability Class	Storie Index	Site Acreage	Soil Constraints	Surface Runoff	Erosion Hazard	Regional Cropland Uses	Site Agricultural Uses	Important Farmland Map Designation
127	Cropley	clay	0 to 2	II irrigated III non-irrigated	60	83 acres	wetness	slow	slight	row crops, pasture, dryland farming	row crops	Prime
128	Cropley	clay	2 to 9	II irrigated III non-irrigated	54	19 acres	wetness	slow to medium	slight-mod	dryland hay/grain	packing, watershed	Other
197	Salinas	silty clay loam	0 to 2	I irrigated II non-irrigated	86	26 acres	none	slow	slight	row crops, hay	row crops	Prime
					N/A	3 acres	creek area	rapid	high	watershed	watershed	Other

Source: U.S. Department of Agriculture Soil Survey San Luis Obispo County, Coastal Part, 1984; California Department of Conservation Important Farmlands Map, 1986.



In addition, the realignment of Elks Lane would involve the pavement of a portion of the property located at 40 Prado Road. This property is zoned O-PD, Office-Planned Development, with and General Plan designation of Office, and is not currently used for agricultural production. However, the soil at this property is identified as Capability Class I (irrigated) Salinas silty clay loam #197 in the USDA Soil Survey for San Luis Obispo County (1984). As stated above, the Salinas silty clay loam soil has no constraints to crop production. Characteristics of this soil type are described in Table 4.6-1.

d. San Luis County Buffer Policy. San Luis Obispo County has adopted agricultural buffer policies that are discretionary in nature, and determined on a case-by-case basis. Generally, buffers are intended to limit human-occupied structures. The County has typically recommended setbacks ranging from 200 to 500 feet between irrigated row cropland and certain urban uses. Buffers of at least 200 feet may be needed on a case-by-case basis for restricted pesticide use based on Agricultural Commissioner's Office permit requirement policies.

4.6.2 Impact Analysis

a. Methodology and Thresholds of Significance. Though broad discretion is granted to lead agencies in determining thresholds of significance in determining environmental impacts, it is common to assume the conversion of prime soils to urban uses would constitute a significant impact to agricultural resources.

Pursuant to the State CEQA Guidelines, a project would have a significant impact if the project would:

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

Prime agricultural land is defined as having any of the following:

- *A soil Capability Class of I or II;*
- *Soil Storie Index of 80-100;*
- *Gross annual revenue of at least \$200 per acre per year; or*
- *A carrying capacity of one animal unit per acre of land.*

Sage Associates conducted a site-specific evaluation of the Dalidio property in 1998. The criteria above were used to determine whether the project would result in the conversion of prime agricultural land to non-agricultural use. The conversion of prime agricultural land to non-agricultural use is considered to be a potentially significant impact.



b. Project Impacts and Mitigation Measures.

Impact AG-1 The proposed project would result in the direct conversion of approximately 60 acres of actively farmed prime soils to non-agricultural uses. This is considered a Class I, *significant and unavoidable impact*.

Dalidio Property. The Dalidio property contains 83 acres of Cropley clay and 26 acres of Salinas silty clay loam, for a total of 109 acres of prime soil on-site. These two types of soils on the areas of the site used for crop production meet at least one of the four criteria listed above for determination of prime agricultural land. The Cropley clay has a Capability Class II (irrigated) rating and high average gross revenue of about \$4,000 per acre for county row crop land. The Salinas silty clay loam has a Capability Class I (irrigated), a Storie Index of 86, and a high average gross revenue of about \$4,000 per acre for county row crop land. Implementation of the proposed project would convert 60 acres of the 109 acres of prime agricultural land currently in row crop production to a non-agricultural use. Therefore, the impact of converting 60 acres of the Dalidio property to non-agricultural uses is considered a significant and unavoidable impact of the proposed project.

Prado Road Interchange. Construction of the Prado Road interchange and auxiliary lane would not result in the conversion of prime farmland to non-agricultural uses. However, the realignment of Elks Lane and the use of the abandoned gas station site and its surrounding open land area for the interchange footprint would result in the conversion of approximately 0.8 acre of prime agricultural land to an urban infrastructure use. The open land surrounding the abandoned gas station has not been used for agricultural production for many years. The site is General Plan-designated and zoned for Office uses. Nevertheless, the impact of converting 0.8 acre of State-defined prime agricultural land to non-agricultural use is considered a significant unavoidable impact of the proposed project.

It should be noted that the applicant would acquire an open space easement over 20 acres of off-site agricultural land of similar soil type, which would reduce overall regional impacts on prime soils areas.

Mitigation Measures. No measures are available to fully mitigate the loss of prime agricultural land. However, there may be opportunities to reduce impacts of this conversion by maintaining the viability of the remaining land to be farmed. The following mitigation measures are recommended to reduce these impacts to the extent possible:

AG-1(a) Access for agricultural equipment shall be provided to the remaining agricultural land from the proposed collector street and from Dalidio Road and Elks Lane. Curbing shall be designed or cut to provide wide "driveway - like" access to the cropland for all farm equipment.

AG-1(b) Irrigation water sources and infrastructure shall be provided to the remaining 58.8 acres of prime farmland on the Dalidio property. Water cost shall be at current rates.



The proposed project's development plan states that water for continuing agricultural operations shall be supplied through existing wells from the underlying aquifer. This is consistent with how water is currently provided for on-site agricultural operations and would fulfill the requirements of the above measure.

- AG-1(c) Agricultural Easement.** The remaining approximately 58.8 acres of prime agricultural land on the Dalidio Property shall remain as a single parcel and be placed under a permanent agricultural easement held by the Land Conservancy of San Luis Obispo County, Coastal San Luis Resource Conservation District, or other qualified conservation organization. Fee title to the property may continue to be held by a private party or may be transferred to the City of San Luis Obispo. Cropland production shall have preference over all other open space uses and shall be encouraged through competitive lease rates and protection through the San Luis Obispo County Right to Farm Ordinance. The current farmer would consider the 52 acres as an agriculturally viable unit for row crop production and has expressed interest in continuing to farm on-site.
- AG-1(d) Off-Site Open Space Dedication Agricultural Characteristics.** The 20 acres of off-site open space proposed to be funded by the applicant shall be characterized by similar overall agricultural suitability as the on-site agricultural lands.

Significance After Mitigation. Implementation of these measures would reduce impacts to the remaining agricultural land on-site. However, since about 60 acres of prime agricultural land would still be converted to non-agricultural use, impacts to agricultural resources would remain significant and unavoidable.

This conclusion reiterates the conclusion of the City of San Luis Obispo Land Use Element/Circulation Element Final EIR, certified by the City in 1993. The conversion of the Dalidio property and 40 Prado Road to urban uses was analyzed in the 1993 FEIR. The impacts to agricultural lands due to development accommodated by the Land Use Element was then identified as a Class I unavoidable significant impact due to the conversion of 700 acres of state-identified prime agricultural land. Therefore, the proposed project constitutes a part of the previously-identified impact, and would not result in an additional significant impact to the one already determined in the 1993 document.

- Impact AG-2 The proposed project may result in land use conflicts with the continued on-site and adjacent agricultural operations. This is considered a Class II, significant but mitigable impact.**

Dalidio Property. As development occurs on the Dalidio property, conflicts could occur between continuing on-site agricultural operations and existing agricultural operations immediately south of the proposed project site. Detrimental effects could occur to the shoppers and employees at the project site, as well as to existing agricultural development. Typical land use conflicts between development and agriculture are described below.



Impacts to Commercial and Office/Business Park Uses. The agricultural property south of and adjacent to the area of the Dalidio property that is proposed to be developed with the San Luis Marketplace and office/business park uses could create health-related and nuisance conflicts with on-site shoppers and employees. In particular, the use of pesticides on the adjacent row crops and the suspension of dust from operation of farm equipment could create health concerns to both users of the proposed facilities. This is a potentially significant impact. The use of methyl bromide as a soil fumigant is a particular concern; however, this chemical is typically used on strawberry fields, and has not been identified as one of the pesticides used on-site. Any restricted pesticides, like methyl bromide, would require a permit be obtained through the San Luis Obispo County Agricultural Commissioner's Office. ~~Agricultural Commissioner approved strategies may be utilized to reduce conflicts between agricultural operations and adjacent uses. These strategies may include, but are not limited to, the restriction of pesticide spraying within a specified distance of the adjacent uses.~~

Impacts to Agricultural Uses. Urban development adjacent to farmland can have several negative impacts on continued farm operations. Construction of the commercial and office/business park portions of the project could create excessive dust that could temporarily affect agricultural productivity. In the long term, potential effects associated with increased access to adjacent agricultural lands could include vandalism to farm equipment or fencing, and theft of crops. Soil compaction from trespassers can also damage crop potential and spread disease. These can result in direct economic impacts. The proposed commercial buildings along the southwestern portion of the proposed commercial area would act as a buffer if the building entrance faces the parking lot and any rear entrances are only for shipping and receiving. Nevertheless, impacts to agricultural activity are considered potentially significant.

Prado Road Interchange. Construction of the proposed auxiliary lane and Prado Road Interchange could create excessive dust that could temporarily affect agricultural productivity on the site adjacent to U.S. Highway 101. In addition, the storage and maintenance of construction equipment on the property could result in contamination of the soil and soil compaction, potentially causing a decrease in crop potential. Therefore, impacts to agricultural activity are considered potentially significant.

Mitigation Measures. The following mitigation measures are recommended to reduce the potential impacts from agricultural land use conflicts to a less than significant level.

- AG-2(a)** A 100-foot buffer between urban and agricultural uses shall be incorporated into the design the San Luis Marketplace, and other urban uses on the Dalidio property. Agricultural buffers can include non-habitable structures, roadways, parking, landscaped areas, and non-habitable buildings.
- AG-2(b)** All future uses on the designated open space areas shall be compatible with continued farming of the remaining cropland. Adequate buffer zones of at least 100 feet between human occupied structures, or other areas as required by the Agricultural Commissioners Office, and the remaining cropland shall be provided and landscaping along the west side of the potential collector road shall be part of the project approval requirements. These buffer zones shall be provided within the



designated open space areas, and shall not diminish the amount of farmland available for use.

- AG-2(c)** For the construction activities on the Dalidio property as well as for the Prado Road interchange, construction equipment storage and construction staging shall be confined to the areas planned for conversion from agricultural to urban uses. All construction equipment maintenance shall be confined to these areas. No construction equipment staging or storage shall occur on areas designated as Open Space or in agricultural production.

In addition, Section 4.3, *Air Quality*, specifies dust control measures during project construction. These measures would incrementally reduce potential impacts to the productivity of neighboring agricultural uses.

Significance After Mitigation. Implementation of the above measures would reduce land use impacts related to agricultural operations to a less than significant level.

c. Cumulative Impacts. Planned buildout of the City of San Luis Obispo area will convert an estimated 700 acres of agricultural land by about 2020. This is considered a significant and unavoidable cumulative impact to agriculture in the San Luis Obispo area. The proposed project would incrementally contribute to this significant cumulative impact by converting approximately 60 acres of cropland to a non-agricultural use and is therefore considered significant and unavoidable.