3.2 AGRICULTURE AND FORESTRY RESOURCES

This section describes the types and classifications of existing agriculture and forestry resources in the Master Plan Area and surroundings, including Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. It also addresses the potential for implementation of the 2035 Master Plan to result in the conversion of agricultural lands to other uses or the loss of forestry resources.

No comments regarding agriculture or forestry resources were received in response to the Notice of Preparation (NOP).

3.2.1 Regulatory Setting

FEDERAL

There are no federal regulations related to agriculture that apply to the 2035 Master Plan.

STATE

California Department of Conservation Farmland Mapping and Monitoring Program

Farmland in California is classified and mapped according to the California Natural Resources Agency, Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP). Authority for the FMMP comes from Government Code Section 65570(b) and PRC Section 612. The FMMP was established in 1982 to continue the Important Farmland mapping efforts begun in 1975 by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS), which mapped farmlands based on soil quality and land use and classified the land's suitability for agricultural production accordingly (DOC 2004). The FMMP, like the NRCS, classifies agricultural lands according to suitability for agricultural production, but customizes those classifications for California. Collectively, those lands deemed suitable for agricultural production are referred to as Important Farmland. Government Code Section 65570(b) requires DOC to collect or acquire information on the amount of land converted to or from agricultural use for every mapped county, with a minimum map unit size of 10 units, and to report this information to the state legislature for purposes of planning for the future of California's agricultural land resources. PRC Section 612 requires DOC to prepare, update, and maintain Important Farmland series maps and other soils and land capability information.

FARMLAND CLASSIFICATION

The State of California maps and classifies farmland through the DOC FMMP. Classifications are based on a combination of physical and chemical characteristics of the soil and climate that determine the degree of suitability of the land for crop production. The classifications under the FMMP are as follows:

- Prime Farmland—land that has the best combination of features for the production of agricultural crops;
- ► Farmland of Statewide Importance—land other than Prime Farmland that has a good combination of physical and chemical features for the production of agricultural crops, but that has more limitations than Prime Farmland, such as greater slopes or less ability to store soil moisture;
- ▶ Unique Farmland—land of lesser quality soils used for the production of the state's leading agricultural cash crops;
- Farmland of Local Importance—land of importance to the local agricultural economy;
- Grazing Land—existing vegetation that is suitable for grazing;
- ▶ Urban and Built-Up Land—land occupied by structures in density of at least one dwelling unit per 1.5 acres;
- ► Land Committed to Nonagricultural Use—vacant areas; existing land that has a permanent commitment to development but has an existing land use of agricultural or grazing lands; and

▶ Other Land—land not included in any other mapping category, common examples of which include low-density rural developments, brush, timber, wetland, and vacant and nonagricultural land surrounded on all sides by urban development.

Section 21095 of the CEQA statute and the State CEQA Guidelines Appendix G define three of the FMMP's Important Farmland categories—Prime Farmland, Farmland of Statewide Importance, and Unique Farmland—as agricultural lands for purposes of CEQA analysis and acknowledge that their conversion to nonagricultural uses may be considered a significant impact.

CEQA Section 21095 and CEQA Guidelines Appendix G, together, define Prime, Unique, and Farmland of Statewide Importance as "Important Farmland," whose conversion may be considered significant. Local jurisdictions are permitted to consider other classifications of farmland as important and can also use a customized agricultural land evaluation and site assessment model to determine farmland importance and impacts from conversion. Important Farmland, within the context of CEQA, is not limited to active agricultural land but refers to land that has been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the FMMP, which may include open space.

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) enforces the laws that regulate logging on nonfederal lands in California. CAL FIRE also provides periodic assessments of forest resources within California as part of the Forest and Range Assessment Project. Currently, CAL FIRE is preparing the 2015 Assessment, an update to the 2010 Assessment, which will present an assessment of the trends, conditions, and degree to which forestland conversion has occurred. CAL FIRE also maintains the Forest Legacy Program, which is intended to identify and protect environmentally important forestlands that are threatened by conversion of land to nonforest uses by either purchase or through deed restrictions, such as conservation easements.

California Land Conservation Act of 1965

The California Land Conservation Act of 1965, or Williamson Act, preserves agricultural and open space lands through property tax incentives and voluntary restrictive use contracts. Private landowners voluntarily restrict their land to agricultural and compatible open-space uses under minimum 10-year rolling term contracts. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value.

LOCAL

Cal Poly is an entity of the CSU, which is a constitutionally created state agency, and is therefore not subject to local government planning and land use plans, policies, or regulations. Cal Poly may consider, for informational purposes, aspects of local plans and policies for the communities surrounding the campus when it is appropriate. The proposed project would be subject to state and federal agency planning documents described herein but would not be bound by local or regional planning regulations or documents such as the City's General Plan or municipal code.

San Luis Obispo County General Plan

The San Luis Obispo County General Plan Agriculture Element contains the following policies that are relevant to agricultural resources (County of San Luis Obispo 2010):

- Policy AGP18: Location of Improvements.
 - A. Locate new buildings, access roads, and structures so as to protect agricultural land.
- Policy AGP24: Conversion of Agricultural Land.
 - A. Discourage the conversion of agricultural lands to non-agricultural uses through the following actions:
 - 1. Work in cooperation with the incorporated cities, service districts, school districts, the County Department of Agriculture, the Agricultural Advisory Liaison Board, Farm Bureau, and affected

- community advisory groups to establish urban service and urban reserve lines and village reserve lines that will protect agricultural land and will stabilize agriculture at the urban fringe.
- 2. Establish clear criteria in this plan and the Land Use Element for changing the designation of land from Agriculture to non-agricultural designations.
- 3. Avoid land redesignation (rezoning) that would create new rural residential development outside the urban and village reserve lines.
- 4. Avoid locating new public facilities outside urban and village reserve lines unless they serve a rural function or there is no feasible alternative location within the urban and village reserve lines.

City of San Luis Obispo General Plan

The City of San Luis Obispo General Plan contains the following policies that are relevant to agricultural resources (City of San Luis Obispo 2014):

- ▶ Policy 9.1.1: Preserve natural and agricultural landscapes. The City will implement the following policies and will encourage other agencies with jurisdiction to do likewise:
 - A. Natural and agricultural landscapes that the City has not designated for urban use shall be maintained in their current patterns of use.
 - B. Any development that is permitted in natural or agricultural landscapes shall be visually subordinate to and compatible with the landscape features. Development includes, but is not limited to buildings, signs (including billboard signs), roads, utility and telecommunication lines and structures. Such development shall:
 - Avoid visually prominent locations such as ridgelines, and slopes exceeding 20 percent.
 - 2. Avoid unnecessary grading, vegetation removal, and site lighting.
 - 3. Incorporate building forms, architectural materials, and landscaping, that respect the setting, including the historical pattern of development in similar settings, and avoid stark contrasts with its setting.
 - 4. Preserve scenic or unique landforms, significant trees in terms of size, age, species or rarity, and rock outcroppings.
- ▶ Policy 1.9.1: Agricultural Protection. The City shall support preservation of economically viable agricultural operations and land within the urban reserve and city limits. The City should provide for the continuation of farming through steps such as provision of appropriate general plan designations and zoning.
- ▶ Policy 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.

3.2.2 Environmental Setting

Agriculture is an important industry in San Luis Obispo County. In 2018, wine grapes and strawberries generated the highest agricultural production value in the county. Other economically important crops or commodities include broccoli, avocados, cattle and calves, cauliflower, cut flowers, vegetable transplants (from seedlings started in greenhouses to speed crop production in the field), head lettuce, and lemons. Statewide, San Luis Obispo County ranks fourth of all counties for production of broccoli, cauliflower, and strawberry and fifth for avocado and flower production (San Luis Obispo County Department of Agriculture 2018).

EXISTING FARMLAND

San Luis Obispo County is an important key agricultural area within the State of California. Wine grapes and strawberries lead a list of high-value specialty crops grown in the County, followed by broccoli, avocados, cattle and calves, cauliflower, cut flowers, veggie transplants, head lettuce, and lemons (San Luis Obispo County Department of Agriculture 2018). As of 2016, the total area of agricultural land in the County encompassed approximately 1,587,000 acres, of which approximately 397,000 acres were designated as Important Farmland (DOC 2016).

The 1,339-acre Master Plan Area includes Cal Poly's 855-acre main campus, which is where future development of new university facilities would occur under the 2035 Master Plan. Of the Master Plan Area, the FMMP designates approximately 124 acres as Prime Farmland, 12 acres as Farmland of Statewide Importance, and 13 acres as Unique Farmland, for a total of approximately 149 acres; an additional 98 acres are designated as Farmland with Local Potential (here represented by grazing lands), which is not considered agricultural land for purposes of CEQA analysis. The balance of the Master Plan Area acreage is designated as Urban and Built-Up (approximately 457 acres), grazing land (519 acres) and Other Land (approximately 123 acres) (DOC 2018).

Farmland designated within the Master Plan Area, in accordance with the FMMP, is depicted in Figure 3.2-1. As shown in Figure 3.2-1, the approximately 149 acres of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) are located in the western half of the Master Plan Area. The mapped Farmland with Local Potential (grazing lands) is predominantly located along the northern and eastern edge of the Master Plan Area.

EXISTING FORESTRY RESOURCES

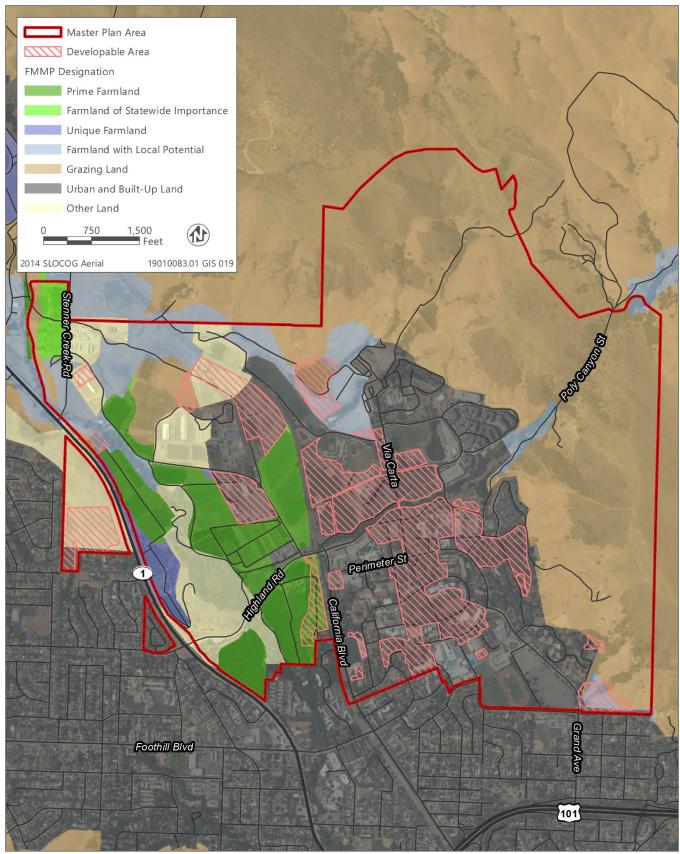
Forestry resources include forestland, timberland, and timberland production zones. Definitions used for these categories are those found in the PRC and California Government Code. Forestland is defined as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forestry resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (PRC Section 12220[g]). Timberland is land, other than land owned by the federal government or land that is designated as experimental forest, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products (PRC Section 4526). Timberland production zones are areas that have been devoted to and used for growing and harvesting timber and compatible uses (Government Code Section 51104[g]).

Existing trees within the 2035 Master Plan area are located either within existing open space areas or retained as landscaping in and around structures. Based on the above definitions, lands within the Master Plan Area are not considered forestry or timber-production lands, nor are they designated as forestland.

3.2.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

To evaluate the potential impacts of the 2035 Master Plan on agricultural resources, the type and degree of agricultural and forestry resources that could be lost/converted were considered in relation to FMMP designations of lands within the Master Plan Area and any policies and programs related to the preservation of agricultural or forestry resources. The extent of acreages of lands potentially affected by development under the 2035 Master Plan was determined through GIS analysis, using maps provided by DOC. GIS software was used to determine acreages of farmland, by FMMP designation. The FMMP farmland mapping layer was overlaid with proposed development footprint GIS data to determine acreage of farmland that could potentially be developed during implementation of the 2035 Master Plan. In determining the level of significance, the analysis assumes that the project would comply with relevant federal and state laws, regulations, and ordinances.



Source: Data downloaded from the Department of Conservation in 2019

Figure 3.2-1 Developable Area and Farmland Mapping and Monitoring Program

Cal Poly 2035 Master Plan

The following "Guiding Principles" were developed early on in the process by the 2035 Master Plan professional team with input from campus leadership, including the college deans, and considering continuity with the 2001 Master Plan. Guiding Principles can be thought of both as starting points for the plan process and as overarching directives relevant to all or most Master Plan topics. The following principles are relevant to agricultural resources:

▶ Sustainability and Environmental Stewardship (S) 02: Cal Poly should preserve and enhance the viability of agriculture and natural habitat systems on its holdings by providing adequate land area including appropriate buffers, connectivity or corridors between related natural communities, and linear continuity along streams.

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines, the 2035 Master Plan would normally have a significant adverse effect related to agricultural and forestry resources if it would:

- convert Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (collectively referred to as Important Farmland for purposes of this section), as shown on the maps prepared pursuant to the FMMP of DOC, to nonagricultural use;
- conflict with existing zoning for agricultural use or a Williamson Act contract;
- conflict with existing zoning for, or cause rezoning of, forestland (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]);
- result in the loss of forestland or conversion of forestland to nonforest use; or
- involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to nonforest use.

ISSUES NOT DISCUSSED FURTHER

Conflicts with Existing Zoning for Agricultural Use

The 2035 Master Plan would not result in the development of nonagricultural land uses adjacent to off-site agricultural uses. While implementation of the 2035 Master Plan would result in the conversion of agricultural land within the western and southern portions of campus to nonagricultural uses, these areas of proposed development are not located directly adjacent to off-campus land zoned for agricultural purposes. As a result, no impacts would occur, and potential conflicts with existing agricultural zoning are not evaluated further.

Williamson Act Contracts

In San Luis Obispo County, lands may be eligible for a Williamson Act contract only if they are within the Agriculture land use category under the County General Plan (County of San Luis Obispo 2019). Because Cal Poly is located on state land and is not subject to County land use designations, it is not eligible for participation in the County's Williamson Act Program. Therefore, the 2035 Master Plan would not result in conflicts with a Williamson Act contract, and there would be no impacts. Potential conflicts with Williamson Act contracts are not evaluated further.

Forestry Resources

The Master Plan Area and surrounding land uses are not designated as forest or timber-production lands; therefore, no forestry resources could be affected by project implementation. This issue is not evaluated further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.2-1: Convert Agricultural Uses, Including Lands Designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (Important Farmland), to Nonagricultural Use

The 2035 Master Plan includes several policies related to the need to preserve and enhance the presence of agriculture. While implementation of the 2035 Master Plan largely avoids designated Important Farmland, the proposed Facilities Operations Complex, including the interim replacement surface parking lot that could be built as the first phase of development of the site, would be located on land designated as Prime Farmland. Based on data obtained through GIS analysis, this would result in the conversion of up to 10 acres of Important Farmland to nonagricultural use. The College of Agriculture has ceased to use the 10 acres for agricultural purposes: its size, condition, and configuration render it difficult to manage and of less value to the College. Nonetheless, because it is currently designated Prime Farmland, its loss would be a **significant** impact.

The 2035 Master Plan supports the need to preserve and enhance the presence of sustainable agriculture, particularly as a means to support the "Learn by Doing" approach to teaching and research. Implementation of the 2035 Master Plan largely avoids areas designated as Important Farmland and other agricultural land. However, the proposed Facilities Operations Complex would be located on land designated as Prime Farmland. This same area is currently proposed to provide a 934-space interim surface parking lot that would be built as the first phase of the Operations complex, to replace existing surface parking lots H12 and H16 that would be displaced by near-term student housing projects in the North Campus subarea. This area is currently occupied by fallow fields and windbreaks. Based on data obtained through GIS analysis and the current land plan, this would result in the conversion of up to 10 acres of Important Farmland to nonagricultural use (see Figure 3.2-1 and Table 3.2-1).

Table 3.2-1 Acres of Affected Land included in the Farmland Mapping and Monitoring Program

FMMP Designation	Acres Affected
Prime Farmland	10.0
Unique Farmland	0.0
Farmland of Statewide Importance	0.0
Total Important Farmland	10.0
Farmland with Local Potential	9.9
Grazing Land	8.9
Other Land	18.4
Urban and Built-Up Land	137.6
Grand Total	184.8

Notes: Important Farmland consists of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance.

FMMP = Farmland Mapping and Monitoring Program

Source: Data compiled by Ascent Environmental in 2019

Important Farmland, within the context of CEQA, is not all active or high-value agricultural land, but refers specifically to land that has been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the FMMP, which may include open space, as noted in Section 3.2.1, "Regulatory Setting." Important Farmland affected by the 2035 Master Plan would consist of Prime Farmland (10 acres) and negligible amounts of Unique Farmland (0.02 acre) and Farmland of Statewide Importance (0.02 acre) (see Table 3.2-1). The 10 acres of Prime Farmland area that would be displaced by the Facilities Operations Complex/interim surface parking lot is no longer used by the College of Agriculture for agricultural purposes. The area is long and narrow, isolated from other agricultural lands, has limited sunlight, and is difficult to manage. The property has been abandoned by the College

in favor of other land better suited for agricultural learning. Notwithstanding, the conversion of up to 10 acres of the approximately 149 acres of Important Farmland within the Master Plan Area would be a **significant** impact.

Mitigation Measures

Mitigation Measure 3.2-1: Preserve Other Campus Agricultural Land

Before conversion of Prime Farmland to nonagricultural uses to accommodate development of the Facilities Operations Complex (including the first phase interim replacement surface parking), Cal Poly shall preserve through a conservation easement or similar legal mechanism an equivalent acreage (up to 10 total acres for the entire 2035 Master Plan Area) of Prime Farmland within its existing land holdings for agricultural purposes (including agricultural teaching and research). If no suitable property exists within the campus, Cal Poly shall identify and purchase or place a conservation easement on a parcel containing equivalent acreage of Prime Farmland.

Significance after Mitigation

Although up to 10 acres of Important Farmland would be conserved through implementation of Mitigation Measure 3.2-1, it would only prevent future loss of an equivalent acreage of Important Farmland and would not replace Important Farmlands converted to development under the 2035 Master Plan, leaving an incremental decrease of prime soils in the County and State. Once development or modifications occur on Important Farmland, the underlying soils are no longer available for agricultural activities. Furthermore, it is infeasible for the campus to replace farmland that has already been developed with other uses. Replacement of lost agricultural land on campus would require removal of existing on-campus facilities that are otherwise needed for Cal Poly's academic purposes. In addition, agricultural lands located on-campus are intended to serve the broader academic mission of the campus. Furthermore, it is highly speculative if suitable land (with underlying soils that meet the criteria of Important Farmland) located off-campus can be acquired by Cal Poly and converted back to agricultural uses. Thus, as with oncampus farmland replacement, off-campus farmland replacement is not considered a feasible form of mitigation owing to the highly speculative nature of any such land transaction. While much of the proposed development, avoids Important Farmland, development of the Facilities Operations Complex and interim replacement surface parking under the 2035 Master Plan would occur on Important (Prime) Farmland. Therefore, this impact would be significant and unavoidable.

Impact 3.2-2: Involve Other Changes in the Existing Environment That Could Result in Conversion of Important Farmland to Nonagricultural Use

Development proposed under the 2035 Master Plan could result in the direct loss or conversion of existing agricultural uses on the Cal Poly campus. However, development would occur within the existing campus boundary, not resulting in sprawl or expansion of the urban growth boundary of the City or County. In addition, substantially increasing oncampus housing under the 2035 Master Plan would reduce development pressure from Cal Poly onto the City and County. This reduced pressure, in addition to City and County policies that discourage the conversion of agricultural land to nonagricultural uses (see Section 3.2.1, "Regulatory Setting"), would limit the potential for off-campus development on agricultural land. Thus, indirect impacts on agricultural resources would be **less than significant**.

As discussed above in Section 3.2.2, "Environmental Setting," there is extensive Important Farmland located in San Luis Obispo County. The conversion of agricultural lands to nonagricultural uses through development in the vicinity of other agricultural land can introduce conflicts between developed uses and agricultural operations and has the potential to indirectly result in additional conversion of agricultural lands. With respect to the 2035 Master Plan, further development of the campus and general economic and population growth in the region could result in development pressures or land use conflicts. Planning for contiguous development and other land use decisions may cause conversion of agricultural uses to nonagricultural uses to accommodate growth projections.

However, development associated with the 2035 Master Plan, including housing, would do so entirely within the confines of the existing campus, and as a result would not result in sprawl, expansion of the urban growth boundary,

or the need for new infrastructure where none exists and would not otherwise indirectly lead to the conversion of any off-campus Important Farmland.

Secondly, the 2035 Master Plan proposes housing for all first- and second-year students, as well as 30 percent of upper division students in residential communities of campus. This would substantially increase undergraduate student housing on the campus, providing accommodations for approximately 63 percent of Cal Poly's undergraduate students. In addition, housing opportunities on campus would be provided to University faculty and staff, graduate students, veterans, students with families, and other members of the greater San Luis Obispo community. With development of on-campus housing, the need for off-campus residential development would be reduced. This reduced pressure, in addition to City and County policies that discourage the conversion of agricultural land to nonagricultural uses (see Section 3.2.1, "Regulatory Setting"), would limit the potential for off-campus development on agricultural land.

Thus, considering that all new development would be focused within the existing campus footprint and the fact that the 2035 Master Plan would provide additional on-site housing, potentially relieving pressure for additional off-campus development, the project would not cause indirect impacts that could result in conversion of other agricultural land, and this impact would be **less than significant**.

Mitigation Measures

No mitigation is required.

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