Appendix B 2023 Agricultural Conversion Study and LESA Modeling

DRAFT Agricultural Land Conversion Study

International Park of Commerce Phase 2 Project

July 14, 2023

Prepared for:

San Joaquin County
Community Development Department
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Acronyms and Abbreviations

A-G	General Agriculture
APN	Assessor's Parcel Number
CEQA	California Environmental Quality Act
County	San Joaquin County
CVFT	California Valley Farmland Trust
DOC	California Department of Conservation
EIR	Environmental Impact Report
FMMP	Farmland Mapping and Monitoring Program
GPA	General Plan Amendment
I/G	General Industrial
IPCP2	International Park of Commerce Phase 2
LCC	Land Capability Classification
LE	Land Evaluation
LESA	Land Evaluation Site Assessment
NRCS	Natural Resources Conservation Service
project area	IPCP2 Specific Plan Area
proposed project	International Park of Commerce Phase 2 Project
SA	Site Assessment
SOI	Sphere of Influence
USDA	U.S. Department of Agriculture
UWMP	Urban Water Management Plan
Williamson Act	California Land Conservation Act of 1965
WSID	West Side Irrigation District
WSS	Web Soil Survey
ZOI	Zone of Influence

1.0 INTRODUCTION

The purpose of this Agricultural Conversion Study is to quantifiably evaluate the potential impacts of the International Park of Commerce Phase 2 (IPCP2) Specific Plan Project (proposed Project) on agricultural resources located on and adjacent to the Project site.

Several factors are evaluated when determining whether implementation of a particular project would have a significant impact on agricultural resources. One factor is the existing land uses on a project site. Another consideration is a project site's designation under the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP), which produces maps and statistical data used for analyzing impacts on California's agricultural resources. Yet another factor is whether a project site is under a Williamson Act (California Land Conservation Act of 1965) Contract, which enables local governments to enter into contracts with private landowners to restrict specific parcels to agricultural or compatible open space uses.

An Agricultural Conversion Study is a resource that may be used to determine whether a project would result in a significant impact on agricultural resources under the California Environmental Quality Act (CEQA). The Agricultural Conversion Study uses a points-based approach for rating the relative importance of agricultural lands based upon specific quantifiable elements.

2.0 PROJECT DESCRIPTION

The proposed Project would involve the development of approximately 284.3 acres of land with a warehouse and distribution facility located in unincorporated San Joaquin County (County), west of the City of Tracy. The proposed Project would include construction of internal traffic circulation; vehicle, truck, and trailer parking; outdoor storage, and onsite water and wastewater treatment facilities.

The County's General Plan Land Use Map designates the Project site as General Agriculture (A-G) and the County Zoning Map designates the parcels within the Project site as A-G 40-acres zoning district. Project implementation would involve the adoption and implementation of a General Plan Amendment (GPA) and the IPCP2 Specific Plan; the approval a zoning change; and development of the area consistent with the IPCP2 Specific Plan. The proposed Project includes a GPA to amend the General Plan land use designation from A-G to General Industrial (I/G) and proposes rezoning the site from A-G to General Industrial and Specific Plan-1 (I-G/SP-1).

2.1 PROJECT SITE LOCATION AND EXISTING SETTING

The Project site is located approximately 60 miles east of San Francisco on the eastern slope of the Altamont Pass, adjacent to the City of Tracy and outside of its Sphere of Influence (SOI) within an unincorporated area of the County. The 284.3-acre area is located within the IPCP2 Specific Plan Area (Project Area) and is bisected by Schulte Road, east of the proposed extension of Pavilion Parkway to the west, and south of the proposed extension of Promontory Parkway. The Project site is undeveloped and the West Side Irrigation District (WSID) Upper Main Canal cuts through the northern portion of the development area. It is composed of four parcels identified as Assessor's Parcel Number (APN) 209-240-36, APN 209-240-37, APN 209-250-10, and APN 209-250-37. APNs 209-240-36 and 209-240-37 comprise the southern portion of the site, south of Schulte Road, while APNs 209-250-10 and APNs 209-250-37 make up the northern portion of the site. APNs 290-250-10 and 209-250-37 are bisected by the WSID Canal.

The Project site is located within an area of the County that is used for both industrial and agricultural uses. The Project site itself is currently in agricultural use, with almond orchards planted across the site. There are approximately 100,000 almond trees that would be removed as part of the proposed project. The majority of the site is unpaved, with the exception of Schulte Road. The WSID Canal is earthen-lined. There are no buildings or structures on the site. The Project site is relatively flat and slopes from an elevation of 149 feet above sea level at the southwest corner of the proposed Project Area to elevation 95 feet at the northeast corner. Historic groundwater level at the Project site is approximately 75 feet below ground surface. Groundwater was not observed in the geotechnical investigations at the Project site; however, fluctuations in the level of groundwater may occur to variations in rainfall, irrigation practice, and other factors.

3.0 REGULATORY SETTING

3.1 STATE

3.1.1 Farmland Mapping and Monitoring Program

The California Department of Conservation established the FMMP in 1982. The FMMP is a non-regulatory program and provides a consistent and impartial evaluation of agricultural land use and land use changes throughout California. The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural lands are rated according to soil quality and irrigation status. The FMMP's Important Farmland map categories include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land. FMMP maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance.

The FMMP Important Farmland categories are defined as:

- **Prime Farmland** is defined by the FMMP as farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time in the four years prior to the mapping date.
- **Farmland of Statewide Importance** is defined by the FMMP as 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.
- **Unique Farmland** is defined by the FMMP as farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
- **Farmland of Local Importance** is defined by the FMMP as land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.
- **Grazing Land** is defined by the FMMP as land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

- **Other Land** is defined by the FMMP as 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 land and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is also mapped as other land.

3.1.2 California Land Conversion Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965, also known as the Williamson Act, was adopted in 1965 to encourage the preservation of the state's agricultural lands and to prevent their premature conversion to urban uses. In order to preserve these uses, the Act established an agricultural preserve contract procedure by which any county or city taxes landowners at a lower rate, using a scale based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. In return, the owners guarantee that these properties remain under agricultural production for a 10-year period. The contract is self-renewing; however, the landowner may notify the county or city at any time of the intent to withdraw the land from its preserve status. There are two means by which the landowner may withdraw the land from its contract preserve status. First, the landowner may seek to cancel the contract. This takes the land out of the contract quickly with a minimal waiting period but the landowner pays a statutory penalty to the State. Second, the landowner may notice a non-renewal or seek a partial non-renewal of the contract. Land withdrawal through the non-renewal process involves a 9- or 10-year period (depending on the timing of the notice) of tax adjustment to full market value before protected open space can be converted to urban uses.

Williamson Act subvention payments to local governments have been suspended since the fiscal year 2009-10 due to the State's fiscal constraints. The Williamson Act contracts between landowners and local governments remain in force, regardless of the availability of subvention payments.

3.1.3 California Environmental Quality Act

CEQA was adopted in 1970 by the California State Legislature to identify, protect, and minimize impacts to the State's environmental resources, and codified as Section 21000 of the State's Public Resources Code. CEQA vests the primary responsibility of carrying out its objectives to local municipalities. In determining whether a proposed project may have a significant effect on agricultural resources, City of Manteca uses the thresholds provided in Appendix G of the CEQA Guidelines.

3.1.4 Public Resources Code 21095 – California Agricultural Land Evaluation and Site Assessment Model

Land Evaluation and Site Assessment (LESA) is a term used to define an approach for rating the relative quality of agricultural land based upon specific measurable features. The formulation of a California LESA Model is the result of Senate Bill 850 (Chapter 812/1993), which charges the Resource Agency (in consultation with the Governor's Office of Planning and Research) with developing an amendment to Appendix G of the CEQA Guidelines concerning agricultural lands. Such an amendment is intended "to

provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process" (Public Resources Code Section 21095).

A LESA analysis is based on the following definition of agricultural land contained in CEQA, Public Resources Code Section 21060.1:

> *21060.1 (a) "Agricultural land" means prime farmland, farmland of statewide importance, or unique farmlands, as defined by the United States Department of Agriculture land inventory and monitoring criteria as modified for California.*
>
> *21060.1 (b) In those areas of the state where lands have not been surveyed for the classifications specific in subdivision (a), "agricultural land" means land that meets the requirement of "prime agricultural land" as defined in paragraph (1), (2), (3), or (4) of subdivision (c) of Section 51201 of the Government Code [the Williamson Act].*

3.2 LOCAL

3.2.1 San Joaquin County General Plan

The County's General Plan includes the following goals and policies related to agriculture:

Goal LU-1: Direct most urban development towards cities and urban and rural communities within the unincorporated county to promote economic development, while preserving agricultural lands and protecting open space resources.

- **Policy LU-1.1: Compact Growth and Development.** The County shall discourage urban sprawl and promote compact development patterns, mixed-use development, and higher development intensities that conserve agricultural land resources, protect habitat, support transit, reduce vehicle trips, improve air quality, make efficient use of existing infrastructure, encourage healthful, active living, conserve energy and water, and diversify San Joaquin County's housing stock
- **Policy LU-1.4: Encourage Infill Development.** The County shall encourage infill development to occur in Urban and Rural Communities and City Fringe Areas within or adjacent to existing development in order to maximize the efficient use of land and use existing infrastructure with the capacity to serve new development. The County shall balance infill development within outward expansion of communities and new development in other unincorporated areas.
- **Policy LU-1.5: Clear Boundaries.** The County shall strive to preserve agricultural and open space areas that contribute to maintaining clear boundaries among cities and unincorporated communities.

Goal LU-2: Promote efficient development and land use practices in new development that provide for the protection of vital resources and enhancement of communities.

- **Policy LU-2.1: Compatible and Complimentary Development.** The County shall ensure that new development is compatible with adjacent uses and complements the surrounding natural or agricultural setting.
- **Policy LU-2.10: Soils Information.** The County shall consider the soils information from the Farmland Mapping and Monitoring Program during review of proposed new development projects.
- **Policy LU-2.14: General Plan Land Use Amendments.** When reviewing proposed General Plan amendments to change or modify land use designations or the land use diagram or a zoning reclassification, the County shall consider the following:
    - consistency of the proposal with the Vision and Guiding Principles and the goals and policies of the General Plan;
    - new physical, social, or economic factors that were not present when the time of General Plan was adopted;
    - reasonable alternative sites in the vicinity that are already planned for the use and can accommodate the proposal;
    - potential for an undesirable, growth-inducing precedent or premature conversion of agricultural land; and
    - the availability of infrastructure and services; and the effect on the fiscal health of the County.
- **Policy LU-2.15: Agricultural Conversions.** When reviewing proposed General Plan amendments to change a land use diagram or zoning reclassification to change from an agricultural use to non-agricultural use, the County shall consider the following:
    - potential for the project to create development pressure on surrounding agricultural lands;
    - potential for the premature conversion of prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and confined animal agriculture;
    - potential for impacts on surrounding farming operations and practices; and
    - provision of infrastructure and services to the new use and the potential impact of service demands or on the surrounding area.

Goal LU-7: Provide for the long-term preservation of productive farmland and to accommodate agricultural services and related activities that support the continued viability of the County's agricultural industry.

- **Policy LU-7.5: Right to Farm.** The County shall strive to protect agricultural land against nuisance complaints from non-agricultural land uses though the implementation of the San Joaquin County Right to Farm ordinance and, if necessary, other appropriate regulatory and land use planning mechanisms.
- **Policy LU-7.7. Agricultural Buffers.** The County shall ensure non-agricultural land uses at the edge of agricultural areas incorporate adequate buffers (e.g., fences and setbacks) to limit conflicts with adjoining agricultural operations.
- **Policy LU-7.10: Agricultural Mitigation Program.** The County shall continue to require agricultural mitigation for projects that convert agricultural lands to urban uses.
- **Policy LU-7.11: Agricultural Land Preservation Mechanisms.** The County shall support regulatory, incentive-based, and financial mechanisms for the preservation of agricultural land.
- **Policy LU-7.12: Agricultural Land Conversion Mitigation.** The County shall maintain and implement the Agricultural Mitigation Ordinance to permanently protect agricultural land within the County.

3.2.2 San Joaquin County Agricultural Mitigation Ordinance

In 2006, the San Joaquin County Board of Supervisors enacted the Agricultural Mitigation Ordinance. Finding that the “loss of farmland to development is irreparable” and that zoning and other regulatory measures are an “inadequate” approach to preservation. The ordinance (Title 9, Division 10, Chapter 9-1080, Agricultural Mitigation, of the San Joaquin County Ordinance Code) calls for:

- At least a 1:1 ratio between the acres of farmland lost and preserved;
- Preservation through the acquisition of easements either (1) directly by the developer or (2) through payment of in-lieu fees;
- Mitigation of either a General Plan amendment or rezoning that changes land from an agricultural to non-agricultural designation, regardless of the non-agricultural designation;
- Having a “qualified entity” hold the easements and administer the fees—generally assumed to be the Central Valley Farmland Trust (CVFT);
- Coordination with similar mitigation efforts of the cities, the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), and the Delta Protection Commission; and
- Organization of a nine-member Agricultural Technical Advisory Committee (with three members each appointed by the San Joaquin Farm Bureau Federation, the Building Industry Association, and the Board of Supervisors) to develop a Mitigation Strategy, report annually on the effectiveness of the program, and advise the county. (San Joaquin County 2014)

3.2.3 San Joaquin County Right to Farm Ordinance

Division 9, Right to Farm, of the San Joaquin County Ordinance Code established the County's Right to Farm Ordinance which addresses the problem of urban growth encroaching on agricultural land by seeking to reduce nuisance complaints about farm operations from residential neighbors. Using disclosure methods, purchasers and existing owners of residential property are informed about the local importance of agriculture and the possible negative impacts of residing near normal farm operations, such as noise, odors, insects, dust, fumes, operation of machinery, application of pesticides and fertilizers, storage and disposal of manure, and other operational requirements. The ordinance is intended to protect existing farming operations from pressure to cease operations when residential development occurs nearby. The county established an Agricultural Grievance Committee to assist in resolution of disputes that arise regarding such operations or activities (San Joaquin County 2014).

3.2.4 Agricultural Conservation Easement

Agricultural easements are voluntary and combine elements of landowner compensation and regulation. Conservation easements typically eliminate, in perpetuity, the development rights from affected parcels. Landowners voluntarily sell their future development rights for cash, tax benefits, or a mix of both, keeping all other rights of ownership. Typically, the economic benefit of an easement is the difference between its value in agricultural use and its development potential market value. Landowners negotiate terms and sell their easements to government agencies or nonprofit land trusts, which then become responsible for monitoring parcel use to ensure compliance with the easement terms. Legally recorded in property deeds, easements run with the land and are not affected by ownership changes. California Valley Farmland Trust (CVFT) is emerging as the principal broker and holder of agriculture-oriented easements in the county, and easements in San Joaquin County held by CVFT were first established in 2006 (San Joaquin County 2014).

4.0 AGRICULTURAL PRODUCTIVITY

4.1 CROP PRODUCTION

San Joaquin County is one of the nation's top ten agricultural areas in productivity and market value, and agriculture in the County is a $2 billion annual industry (San Joaquin County 2014). San Joaquin County agricultural crops and commodities vary annually on their individual rankings based on the amount of acreage dedicated to each commodity. The top ten crops for 2021, listed in descending order of gross value, were as follows (San Joaquin County 2022):

1. Almonds: $453,764,000
2. Milk, All: $445,621,000
3. Grapes: $428,359,000
4. Walnuts: $367,825,000
5. Cherries: $319,989,000
6. Eggs: $207,583,000
7. Cattle, Calves: $111,616,000
8. Tomatoes: $70,980,000
9. Hay, All: $68,617,000
10. Potatoes: $64,280,000

The 2021 gross value of San Joaquin County's agricultural production is $3,193,234,000 which represents a 5.34 percent increase in value of $161,955,000 over 2020. In 2021, the fruit and nut crops continued to be the largest category with an overall increase in total value by 7.68 percent over 2020. Other commodity groups that showed gains include livestock and poultry products due to an increase in milk production, egg pricing, and turkeys, sheep, and lamb pricing; nursery products; and apiary products due to an increase in honey production and pricing. The vegetable commodity group showed a decrease in 2021 from the previous year due to a significant drop in acreage for the commodity (San Joaquin County 2022).

4.2 COUNTY AGRICULTURAL LAND CONVERSION

4.2.1 Important Farmland

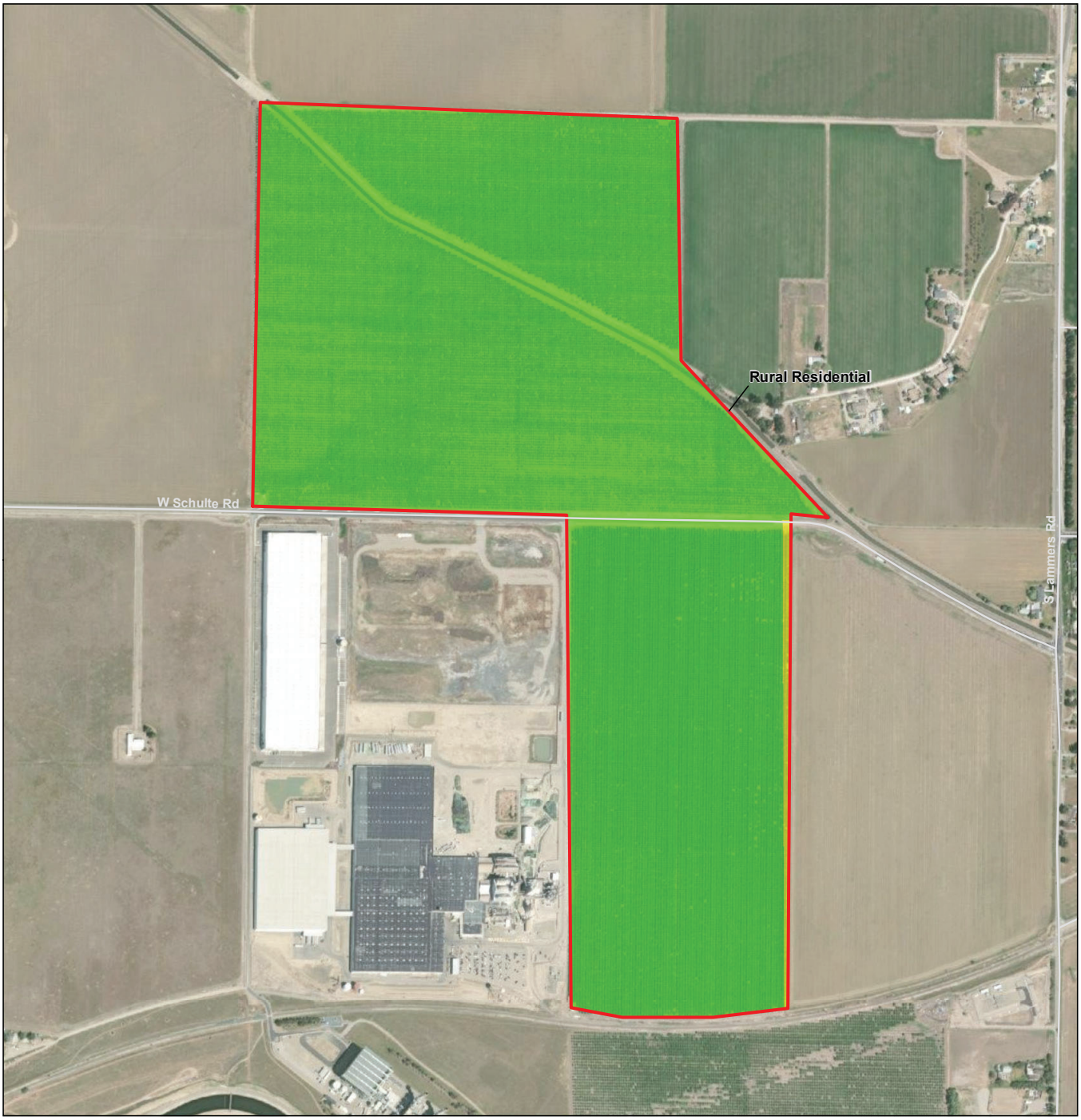
According to the DOC Division of Land Protection's FMMP, the County lost 22,359 acres of Important Farmland between 1990 and 2018 (DOC 2018). Approximately 53,331 acres of agricultural land uses in the County, including Important Farmland, were converted to urbanized uses during the same time frame.

Based on the FMMP data, the Project site consists of 281.29 acres of Prime Farmland, 2.97 acres of Farmland of Local Importance, and 0.002 acres of Rural Residential Land (Figure 1) (DOC 2023).

4.2.2 Williamson Act Contract Land

The Williamson Act is a statewide program enacted in 1965, allowing property owners to enter into a contract with the County to maintain the land in agricultural production. All contracts are for a term of 10 years and automatically renew each year unless a Notice of Non-Renewal is filed by the owner. The County Assessor's office is responsible for the assessment and administration of the Williamson Act. The Assessor's office annually updates the taxable values and responds to the ever-increasing information inquiries by property owners, prospective property owners, real estate agents, etc. In 2008, the state subvention monies were reduced by 10 percent due to the state budget; and from 2009 forward, the subvention funds were essentially eliminated. According to the San Joaquin County General Plan, as of 2010, there are approximately 533,000 acres of Williamson Act lands that exist in the County. Approximately 38,500 acres of County Williamson Act lands (both prime and non-prime lands) are currently under non-renewal, as identified in the County General Plan. Additionally, San Joaquin County contains an additional 60,000 acres of land that are designated as Farmland Security Zone lands, which are areas where contracts are of longer duration than regular Williamson Act contracts, initially at least 20 year terms (San Joaquin County 2014).

No parcels under Williamson Act contract or Farmland Security Zone contract are currently located on the Project site. However, the Project site is identified as within an agricultural preserve. As defined by the DOC, an agricultural preserve defines the boundary of an area within which a city or country will enter into contracts with landowners. The boundary is designated by resolution of the Board of Supervisors or City Council having jurisdiction, and only land located within an agricultural preserve is eligible for a Williamson Act contract. Agricultural preserves are regulated by rules and restrictions designated in the resolution to ensure that the land within the preserve is maintained for agricultural or open space use (DOC 2023).



Project Area (284.26 ac.)

FMMP Farmland Type

- Prime Farmland (281.29 ac.)
- Farmland of Local Importance (2.97 ac.)
- Rural Residential Land (0.002 ac.)

Source: Farmland Mapping and Monitoring Program, California Department of Conservation, Division of Land Resource Protection, August 2022

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Project Location
San Joaquin County, California

Prepared by PG on 2023-02-17
TR by EM on 2023-02-021

Client/Project
International Park of Commerce Phase 2 Project

Figure 1

Title
Important Farmland

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5.0 METHOD

Given the presence and importance of farming and agricultural-related industries in the County, the preservation of farmland is addressed in terms of land use policies in the County's General Plan. This report utilizes multiple factors in determining the impacts of farmland conversion in San Joaquin County, including General Plan policy factors set forth in the San Joaquin County General Plan. Further, the report examines the potential economic losses related to farmland conversion as well as numerous other important criteria that determine the relative value of farmland at its current use.

5.1 LESA MODEL

The LESA Model was developed to provide a lead agency with an optional methodology to ensure that potentially significant environmental effects of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code Section 21095), including during CEQA reviews. As a lead agency, the County may depend on the LESA Model to evaluate the significance of agricultural land conversions.

The LESA Model evaluates and measures a project site's size, soil resource quality, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. These factors are then rated, weighted, and combined, resulting in a single numeric score. This score becomes the basis for determining the significance of a project's potential impacts on agricultural resources.

Using the LESA Model, a project would result in a significant impact on agricultural resources if the project meets the threshold criteria provided in Table 1. The criteria include a Land Evaluation (LE) scoring threshold and a Site Assessment (SA) scoring threshold.

Table 1: California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39 points	Not considered significant
40 to 59 points	Considered significant only if LE and SA subscores are each greater than or equal to 20 points
60 to 79 points	Considered significant unless either LE or SA subscores is less than 20 points
80 to 100 points	Considered significant

Source: California Department of Conservation 1997

The LESA worksheets prepared for the IPCP2 Project to evaluate the proposed Project's potential impacts are provided in Appendix A.

6.0 LAND EVALUATION

There are two LE factors used in the LESA to determine whether a project would have a significant impact on agricultural resources:

- Land Capability Classification (LCC) rating
- Storie Index rating

6.1 LAND CAPABILITY CLASSIFICATION

The LCC rating is based on the suitability of onsite soils for growing crops. The LCC rating includes eight classes of soil designations (identified as Class I through Class VIII), with soils identified as “Class I” having the fewest limitations, and soils designated as “Class VIII” being the least suitable for cropland. The types of onsite soils serve as an indicator of how valuable the project site is as an agricultural resource and, thus, serve as a measure of the capacity of a parcel to produce agricultural products. As such, a parcel with highly valued agricultural soils would rate higher in terms of land capability than a parcel with poorly valued soils. Class I through Class IV are generally considered arable land suitable for cropland (although Class IV contains severe limitations on the types of plants that can be grown), and Class V through Class VIII are generally considered to be unsuitable for cropland, but may have uses for pasture, range, woodland, or grazing. The criteria used to determine a particular soil class is based on landscape location, slope of field, depth, texture, and reaction of the soil.

Subclasses, designated with a lower-case letter (identified as e, w, s, or c), are typically used in conjunction with the roman numerals to further describe soil limitations. The letter “e” shows that the main limitation of the soil is erosion; “w” shows that the presence of water either within or on the soil causes limitation in plant growth; “s” shows that the soil is shallow, droughty, or stony; and “c” shows that the limitation is a climate that is generally too cold or hot for many plants. The c subclass is only used in some parts of the United States where the chief limitation is a climate that is too cold or too dry. There are no subclasses for Class I, because these soils are considered to have few limitations.

The LESA Model takes the LCC classifications and assigns a numeric value between 0 and 100 to indicate higher favorability for agricultural production. The numeric value assigned is referred to as the LCC rating. Table 2 provides various combinations of LCC classes and subclasses, and their associated LCC ratings. The data provided in Table 2 were used to derive an LCC score based on the LCC rating and the proportion of the Project site covered by each soil (calculated by multiplying the LCC rating by the proportion of the site covered by a particular soil). The results of these calculations are provided in Appendix A.

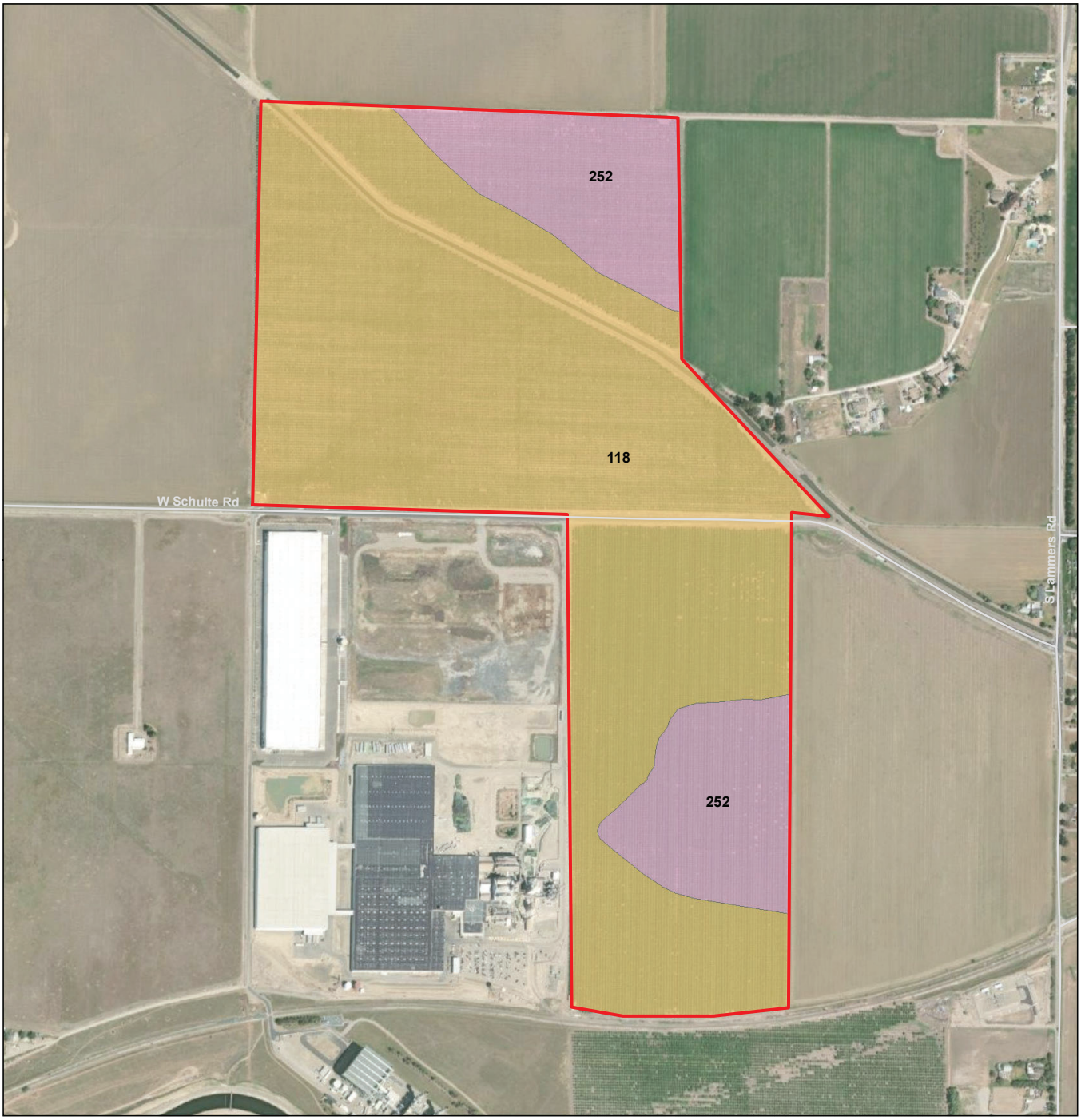
Table 2: Land Capability Classification and LCC Rating

Land Capability Classification	LCC Rating
I	100
IIe	90
IIs, w	80
IIIe	70
IIIs, w	60
IVe	50
IVs, w	40
V	30
VI	20
VII	10
VIII	0

To determine the LCC classes associated with the onsite soils, the U.S. Department of Agriculture (USDA), Natural Resources Conservation Service's (NRCS) Web Soil Survey (WSS) was used (USDA 2023). The WSS provides soil data and information produced by the National Cooperative Soil Survey. It is maintained by the NRCS and provides access to one of the largest natural resource information systems worldwide. NRCS has soil maps and data available online for more than 95 percent of the nation's counties and anticipates having 100 percent soon. The WSS is updated and maintained online as the single authoritative source of soil survey information. According to the WSS, all soil types found on the Project site consist of LCC Class IIs soils (Figure 2). Table 3 provides the soil types found on the Project site and their respective LCC class, rating, and score. As presented in Table 3, the Project site's Capay clay and Stomar clay loam received an LCC Rating of 80. The overall weighted LCC score for the project site is 80.0.

Table 3: Project Soils

Soil Map Unit	Acreage	LCC	LCC Rating	LCC Score
181 – Capay clay, 0 to 1 percent slopes, MLRA 17	223.53	IIs	80	63.20
252 – Stomar clay loam, 0 to 2 percent slopes	60.72	IIs	80	16.80
Weighted LCC Score				80.0



Project Area (284.26 ac.)

Soil Type

118 - Capay clay, 0 to 1 percent slopes, MLRA 17 (223.53 ac.)

252 - Stomar clay loam, 0 to 2 percent slopes (60.72 ac.)

Source: U.S. Dept. of Agriculture, Natural Resources Conservation Service, SSURGO Soils Database, Feb. 2023

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Stantec

Project Location
San Joaquin County, California

Prepared by PG on 2023-02-17
TR by EM on 2023-02-021

Client/Project
International Park of Commerce Phase 2 Project

Figure 2

Title
USDA Soils

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6.2 STORIE INDEX

The Storie Index is a soil rating based on a soil's physical and chemical characteristics that numerically represents its relative degree of suitability for cultivated agricultural production. The Storie Index assesses the productivity of a soil from the following four characteristics: Factor A, degree of soil profile development; Factor B, texture of the surface layer; Factor C, slope; and Factor X, manageable features, including drainage, microrelief, fertility, acidity, erosion, and salt content. A score ranging from 0 to 100 percent is determined for each factor, and the scores are then multiplied together to derive an index rating.

For simplification, Storie Index ratings have been combined into six grade classes as follows: Grade 1 (excellent), 100 to 80; Grade 2 (good), 79 to 60; Grade 3 (fair), 59 to 40; Grade 4 (poor), 39 to 20; Grade 5 (very poor), 19 to 10; and Grade 6 (nonagricultural), less than 10.

Like the LCC classifications, Storie Index ratings associated with onsite soils were determined using the NRCS's WSS. As shown in Table 4, the Project site received a total Storie Index of 46.55.

Table 4: Storie Index

Soil Map Unit	Project Acres	Proportion of Project Area	Storie Index	Storie Index Score
181 – Capay clay, 0 to 1 percent slopes, MLRA 17	223.53	0.79	35	27.65
252 – Stomar clay loam, 0 to 2 percent slopes	60.72	0.21	90	18.90
Totals	**284.25**	**1**	**Storie Index Score**	**46.55**

7.0 SITE ASSESSMENT

There are four SA factors in the LESA that are used to determine whether a project would have a significant impact on agricultural resources:

- Project Size rating
- Water Resources Availability rating
- Surrounding Agricultural Land rating
- Surrounding Protected Resource Land rating

7.1 PROJECT SIZE RATING

The Project Size rating is determined by first looking at the LCC acreage figures tabulated under the LE portion of the LESA, and then using these acreages to determine which grouping generates the highest Project Size score. This score is a function of the agricultural production potential of soil on the project site. The Project Size rating depends on the acreage figures that were tabulated under the LCC rating. This rating is based on identifying acreage figures for three separate groupings of soil classes within the site, and then determining which grouping generates the highest Project Size score. Table 5 provides the Project Size score associated with the amount and quality of soils found on a particular site.

Table 5: Project Size Scoring

LCC Class I or II Soils		LCC Class III Soils		LCC Class IV or Lower	
Acres	**Score**	**Acres**	**Score**	**Acres**	**Score**
80 or above	100	160 or above	100	320 or above	100
60 to 79	90	120 to 159	90	240 to 219	80
40 to 59	80	80 to 119	80	160 to 239	60
20 to 39	50	60 to 79	70	100 to 159	40
10 to 19	30	40 to 59	60	100 to 159	20
Fewer than 10	0	20 to 30	30	Fewer than 40	0
		10 to 19	10		
		Fewer than 10	0		

The inclusion of the measure of a project site's size in the LESA acknowledges the role that size plays in the viability of commercial agricultural operations. In general, larger farming operations can provide greater flexibility in farm management and marketing decisions. Certain economies of scale for equipment and infrastructure can also prove more favorable for larger operations. Additionally, larger operations typically have greater impacts upon the local economy through direct employment, as well as impacts upon support industries (e.g., fertilizers, farm equipment, and shipping) and food processing industries. As shown in Table 6, the Project site received a Project Size score of 100.

Table 6: Project-Specific Size Score

Soil Map Unit	LCC Class I – II	LCC Class III	LCC Class IV – VIII
181 – Capay clay, 0 to 1 percent slopes, MLRA 17	223.53		
252 – Stomar clay loam, 0 to 2 percent slopes	60.72		
Total Acres	284.25	0	0
Project Size Scores	100	0	0
Highest Project Size Score	**100**		

7.2 WATER RESOURCES AVAILABILITY RATING

The Water Resources Availability rating is based on identifying the possible water sources that may be available during years characterized as periods of drought or non-drought. The Project site consists of approximately 284.26 acres of land that is identified as Prime Farmland and Farmland of Local Importance. The existing site has historically been used for agricultural purposes and is currently used for farming almond orchards.

There is a riverine habitat that runs through the northern parcel of the Project Area. Additionally, there is a freshwater pond on the corner of the southern parcel along Schulte Road. However, these features within and surrounding the Project site do not currently provide irrigation features onsite. Water supply for the existing orchard operations onsite is surface water from the WSID.

Table 5 in the DOC's LESA Model Instruction Manual (presented as Table 7 below) is used to tabulate the Water Resource Score of a project site which is based on whether irrigated and dryland agriculture if feasible, and if any physical or economic restriction exist, during both drought and non-drought years.

Table 7: Water Resources Availability Scoring

Option	Non-Drought Years			Drought Years			Water Resource Score
	Restriction			Restriction			
	Irrigated Production Feasible?	Physical Restriction?	Economic Restriction?	Irrigated Production Feasible?	Physical Restriction?	Economic Restriction?	
1	YES	NO	NO	YES	NO	NO	100
2	YES	NO	NO	YES	NO	YES	95
3	YES	NO	YES	YES	NO	YES	90
4	YES	NO	NO	YES	YES	NO	85
5	YES	NO	NO	YES	YES	YES	80
6	YES	YES	NO	YES	YES	NO	75
7	YES	YES	YES	YES	YES	YES	65

Option	Non-Drought Years			Drought Years			Water Resource Score
	Restriction			Restriction			
	Irrigated Production Feasible?	Physical Restriction?	Economic Restriction?	Irrigated Production Feasible?	Physical Restriction?	Economic Restriction?	
8	YES	NO	NO	NO	--	--	50
9	YES	NO	YES	NO	--	--	45
10	YES	YES	NO	NO	--	--	35
11	YES	YES	YES	NO	--	--	30
12	Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years						25
13	Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years)						20
14	Neither irrigated nor dryland production feasible						0

Using the Table 7 above to determine agricultural feasibility and considering the existing agricultural production onsite, irrigated agricultural production on the Project site is currently considered feasible.

As presented in Table 8, the project site received a Water Resources Availability rating of 85.

Table 8: Water Resources Availability Rating

Project Portion	Water Source	Proportion of Project Area	Water Source Availability	Weighted Availability Score
1	Surface water from WSID	1	100	100
Weighted Water Resources Availability Score				**100**

7.3 SURROUNDING AGRICULTURAL LAND RATING

The Surrounding Agricultural Land rating is based on identifying a project's Zone of Influence (ZOI), which consists of the land near a given project site that is likely to influence, and to be influenced by, the agricultural use of the subject site. The ZOI is determined by creating the smallest rectangle that would completely contain a project site, then creating a second rectangle that extends 0.25 mile beyond the first rectangle, including each parcel that is completely or partially within the 0.25-mile buffer (Figure 3). The percentage of total land within the ZOI (minus the subject property) that is under agricultural production is then determined.

Table 9 shows how the ZOI score is calculated for a project's Surrounding Agricultural Land rating.

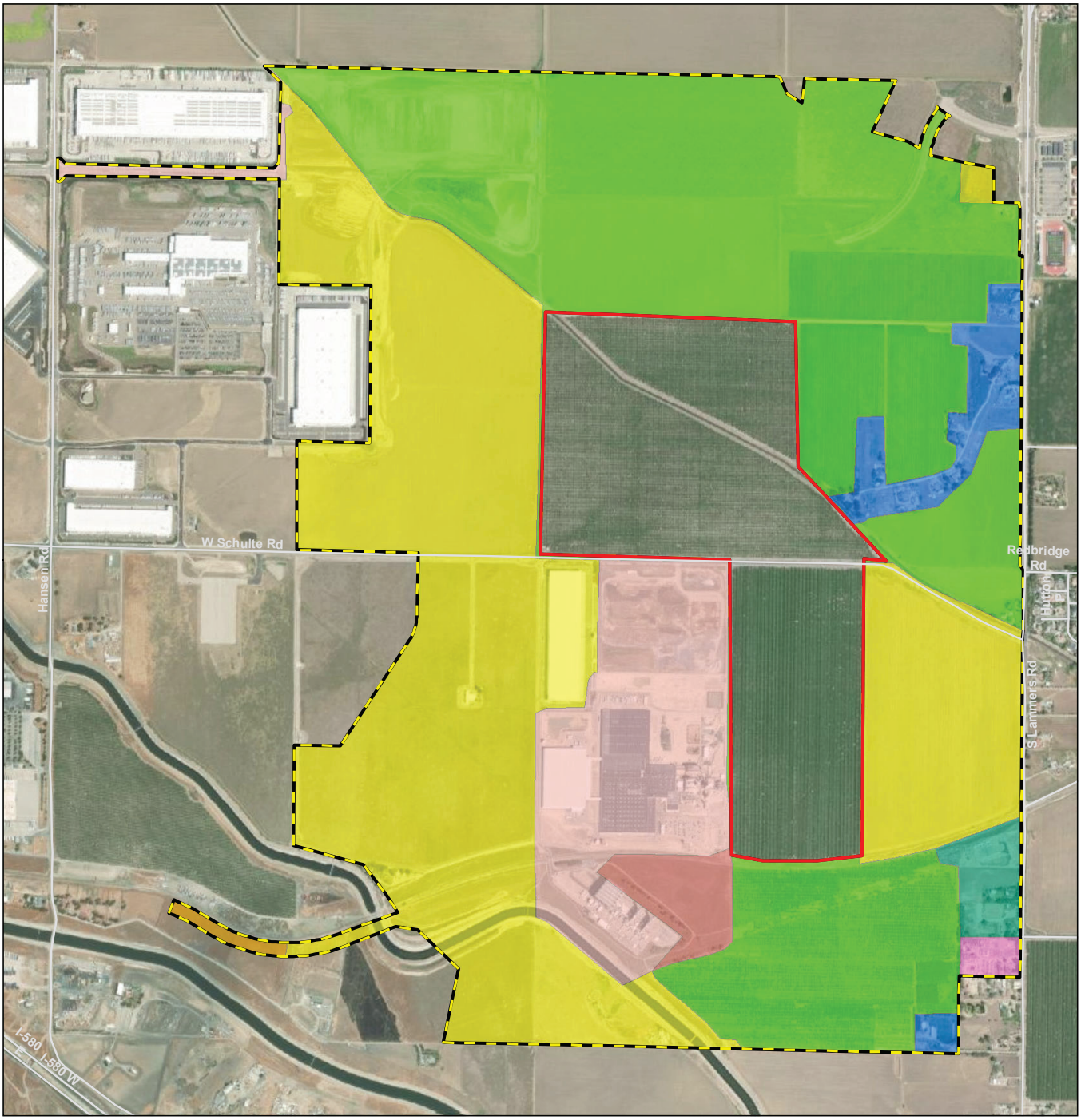
Table 9: Surrounding Agricultural Land Rating

Percent of Project's Zone of Influence in Agricultural Use	Surrounding Agricultural Land Score
90 to 100	100
80 to 89	90
75 to 79	80
70 to 74	70
65 to 69	60
60 to 64	50
55 to 59	40
50 to 54	30
45 to 49	20
40 to 44	10
Less than 40	0

As Table 10 shows, the proposed Project's ZOI (excluding the Project site) encompasses 1,463.91 acres, of which 1,206.63 acres of land are designated as agricultural land. This results in a Surrounding Agriculture Land score of 90, because between 80 and 90 percent of the surrounding parcels are under agricultural production.

Table 10: Zone of Influence Surrounding Agricultural Land

Total Acres	Acres in Agriculture	Percent in Agriculture	Surrounding Agricultural Land Score
1,463.91	1,206.63	82%	90



Project Area (284.26 ac.)
Zone of Influence

FMMP Farmland Type

- Prime Farmland (612.56 ac.)
- Farmland of Local Importance (582.86 ac.)
- Unique Farmland (6.56 ac.)
- Grazing Land (4.65 ac.)
- Semi-Agricultural and Rural Commercial Land (19.44 ac.)
- Rural Residential Land (45.18 ac.)
- Vacant or Disturbed Land (25.40 ac.)
- Urban and Built-up Land (167.26 ac.)

Source: Farmland Mapping and Monitoring Program, California Department of Conservation, Division of Land Resource Protection, August 2022

0 1,000 2,000 N
Feet
1:20,000
(At original document size of 8.5x11)

Stantec

Project Location
San Joaquin County, California

Prepared by PG on 2023-02-17
TR by EM on 2023-02-021

Client/Project
International Park of Commerce Phase 2 Project

Figure 3

Title
Zone of Influence

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7.4 SURROUNDING PROTECTED RESOURCE LAND RATING

The Surrounding Protected Resources Land rating is scored in a similar manner as the Surrounding Agricultural Land rating. “Protected Resource Lands” are those with long-term restrictions that are compatible with or supportive of agricultural uses of land and include the following:

- Williamson Act contracted lands
- Publicly owned lands maintained as park, forest, or watershed resources
- Lands with agricultural, wildlife habitat, open space, or other natural resource easements that restrict the conversion of such lands to urban or industrial uses

Table 11 shows the scoring for a project’s Surrounding Protected Resource Land rating.

Table 11: Surrounding Protected Resource Land Rating

Percent of Project’s Zone of Influence Defined as Protected	Surrounding Protected Resource Land Score
90 to 100	100
80 to 89	90
75 to 79	80
70 to 74	70
65 to 69	60
60 to 64	50
55 to 59	40
50 to 54	30
45 to 49	20
40 to 44	10
Less than 40	0

As presented in Table 12 and shown in Figure 4, the proposed Project’s ZOI (excluding the Project site) encompasses 1,463.91 acres of land, with 1,320.91 acres of land (90 percent of the proposed project’s ZOI) within the County’s Agricultural Preserve. Based on the Surrounding Protected Resource Land Rating presented in Table 11 above, this results in a Surrounding Protected Resource Land score of 100, since between 90 to 100 percent of the surrounding parcels are considered Protected Resources Land.

Table 12: Zone of Influence Protected Resource Land

Total Acres	Acres of Protected Resource	Percent Protected Resource Land	Surrounding Protected Resource Land Score
1,463.91	1,320.91	90%	100

Project Area (284.26 ac.)
Zone of Influence

Agricultural Preserves

Agricultural Preserve (1,320.91 ac.)
No Preserve (143.01 ac.)

Source: County of San Joaquin, February 2023

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1:20,000
(At original document size of 8.5x11)

Stantec

Project Location
San Joaquin County, California

Prepared by PG on 2023-02-17
TR by EM on 2023-02-021

Client/Project
International Park of Commerce Phase 2 Project

Figure 4

Title
Agricultural Preserves

V:\1857\Active\204265300\03 data\gis cad\gis\mxd\AgConversion\Fig4 AgPreserves.mxd Revised: 2023-02-17 By: pglendening

8.0 FINAL SCORE

A single LESA score is generated for a project after all the individual LE and SA factors have been scored and weighted. Scores are based on a scale of a maximum of 100 points. As presented in Section 5.1 above, Table 1 provides the ratings that determine whether a project would result in a significant impact on agricultural resources.

As shown in Table 13, the final LESA Score for the IPCP2 Project is 80.14. The Project has a total project score between 80 and 100 points. Therefore, based on LESA significance thresholds provided in Table 1, Project implementation would be considered a significant impact on agricultural resources.

Table 13: Final LESA Score Sheet

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
Land Capability Classification	80.00	0.25	20.0
Storie Index	46.55	0.25	11.64
LE Subscore		0.50	31.64
SA Factors			
Project Size	100	0.15	15
Water Resource Availability	100	0.15	15
Surrounding Agricultural Land	90	0.15	13.5
Surrounding Protected Resources Land	100	0.05	5
SA Subscore		0.50	48.5
		Final LESA Score	**80.14**

9.0 ENVIRONMENTAL IMPACTS

This section analyzes the proposed Project's potential to result in significant environmental impacts related on agricultural resources. When an impact is determined to be significant, Mitigation Measures are identified that would reduce or avoid the impact.

9.1 THRESHOLDS OF SIGNIFICANCE

In accordance with the CEQA Guidelines Appendix G Environmental Checklist (2023), the following questions were analyzed and evaluated to determine whether impacts to agricultural resources would be significant.

Would the proposed project:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- Conflict with existing zoning for agricultural use, or a Williamson Act Contract?
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

9.2 PROJECT IMPACT ANALYSIS AND MITIGATION MEASURES

Impact AG-1 The proposed project would convert Prime, Unique, or Farmland of Statewide Importance to a non-agricultural use.

Impact Analysis

The proposed Project involves construction of a new industrial park development on an approximately 284.3-acre Project site that is identified as 281.29 acres of Prime Farmland and 2.97 acres of Farmland of Local Importance. The Project site is located in unincorporated San Joaquin County and is located within an area of the County that is used for both industrial and agricultural uses. The Project site itself is currently in agricultural use, with almond orchards planted across the site.

The California LESA Model is designed to assess the significance of a proposed Project's conversion of agricultural land. Loss of agricultural land has typically involved conversion to permanent urban uses, and the LESA model has generally been used to evaluate that type of potential impact. The proposed Project would affect the agricultural land on the Project site for the duration of the life of the proposed Project. Due to the long-term conversion of Important Farmland and based on the LESA score of 80.14, the proposed project would have a potentially significant impact on agricultural resources.

Because the proposed Project would have a significant impact on agricultural resources, mitigation would be required. The proposed Project would be required to implement and comply with the County's General

Plan goals and policies identified above under Section 3.2.1 related to the protection and preservation of agricultural lands within the County. Projects located within the County that convert Prime Farmland are subject to the County's Agricultural Mitigation Ordinance, which requires preservation of farmland at a 1:1 ratio between the acres of farmland lost and preserved. Preservation of farmland would be completed through the acquisition of easements, either directly by the developer or through the payment of in-lieu fees. Compliance with the Agricultural Mitigation Ordinance would be required by Mitigation Measure AG-1 which would require the Project applicant to participate in the preservation of farmland by purchasing easements directly or through the payment of in-lieu fees. The proposed Project would be required to pay all fees as required by the Agricultural Mitigation Ordinance. However, compliance with the ordinance would not fully compensate for acreage of farmland lost and the proposed Project would continue to result in a significant impact to agricultural resources.

The proposed Project would convert a total of 281.29 acres of Prime Farmland to non-agricultural use. Preservation of farmland as required by Mitigation Measure AG-1 and the Agricultural Mitigation Ordinance would reduce impacts from the conversion of Important Farmland to non-agricultural uses. However, as the proposed Project would result in a conversion of Prime Farmland to non-agricultural uses, even with the implementation of Mitigation Measure AG-1, the proposed Project would result in a significant and unavoidable impact.

Level of Significance Before Mitigation
Potentially Significant Impact.

Mitigation Measures

MM AG-1: **Agricultural Mitigation Ordinance.** Prior to the conversion of Important Farmland on the project site, the project applicant shall comply with the County's Agricultural Mitigation Ordinance by preserving farmland at a 1:1 ratio. The project applicant shall either directly complete the acquisition of easements or pay in-lieu fees established on a per-acre basis for the loss of Important Farmland. Fees paid toward the County's program shall be used to fund conservation easements on comparable or better agricultural lands to provide compensatory mitigation.

Level of Significance After Mitigation
Significant and Unavoidable Impact.

Impact AG-2 **The proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract.**

Impact Analysis

Agricultural Zoning

The County's Zoning Ordinance designates the project site as A-G 40-acres zoning district. The purpose of the A-G 40-acres district is to identify agricultural lands for the continuation of commercial agricultural enterprises, as long as such operations are feasible. The proposed Project involves the development of

approximately 284.3-acres of land with a warehouse and distribution facility with internal traffic circulation and vehicle, truck, and trailer parking and outdoor storage, as well as onsite water and wastewater treatment facilities. Industrial uses are not permitted under the A-G zoning designation and therefore, the proposed Project would conflict with existing zoning for agricultural uses.

However, the Project proposes to rezone the site from A-G to I-G/SP-1. The I-G/SP-1 zoning is intended to allow for flexibility in development. The I-G zoning district could provide for a variety of industrial uses, such as manufacturing, distribution, and storage uses, and the SP-1 zoning district would allow for other affiliated uses, such as wastewater treatment. The County's General Plan EIR identified that if conversion of existing agricultural zoning designation does occur, this could result in a significant impact if incompatible uses are considered for these lands such that a physical environmental effect would occur (San Joaquin County 2014). With the approval of the rezoning, the proposed Project would be consistent with the allowed uses under zoning district and the Project site would not be developed with incompatible uses. Additionally, there are no Williamson Act contract lands on the Project site. As such, no conflicts would occur. Therefore, with the approval of the rezoning, the proposed Project would be consistent with the zoning designation of the site, and impacts would be less than significant.

Level of Significance Before Mitigation
Less Than Significant Impact.

Mitigation Measures
None required.

Level of Significance After Mitigation
Less Than Significant Impact.

Impact AG-3 The proposed project would not involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

Impact Analysis
The proposed Project would not cause changes to the existing environment that would result in conversion of Farmland outside the Project site boundary to non-agricultural use. Farmland conversion is caused primarily by urbanization; other chief causes for the loss of Farmland include development of low-density rural residences and ecological restoration projects, such as wetlands and wildlife habitat.

The Project site is located within an area of the County that is used for both industrial and agricultural uses. Land located directly adjacent to the west of the Project site is developed with industrial uses with additional industrial uses located within one mile west of the Project site. Rural residential and single-family residential uses are located to the east of the Project site. The conversion of the Project site could result in changes to the existing environment, due to their location and nature, and result in conversion of Farmland to non-agricultural uses, as the proposed Project involves the construction of roadways and water and wastewater treatment facilities that could promote growth in the area.

However, the County's General Plan identified that implementation of the County's Right to Farm Ordinance and adopted General Plan policies would minimize this impact (San Joaquin County 2014). The Right to Farm Ordinance addresses the problem of urban growth encroaching on agricultural land by seeking to reduce nuisance complaints about farm operations from non-agricultural users. The ordinance is intended to protect existing farming operations from pressure to cease operations when non-agricultural development occurs nearby. The County's General Plan includes polices that discourage agricultural land conflicts which state that development approval processes shall consider the impact on, and compatibility with, surrounding agricultural lands and that such developments are sized and located to avoid potential conflicts. Implementation of the County's Right to Farm Ordinance and General Plan policies would reduce land use conflicts and would protect existing agricultural lands from conversion to non-agricultural uses. Therefore, impacts would be less than significant.

Level of Significance Before Mitigation
Less Than Significant Impact.

Mitigation Measures
None required.

Level of Significance After Mitigation
Less Than Significant Impact.

10.0 REFERENCES

California Department of Conservation (DOC). 1997. California Agricultural Land Evaluation and Site Assessment Model Instruction Manual. Website: https://www.conservation.ca.gov/dlrp/Pages/qh_lesa.aspx. Accessed February 2023.

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Appendix A LESA MODEL WORKSHEETS

Final LESA Score Sheet

Calculation of the Final LESA Score:
NOTES
(1) Multiply each factor score by the factor weight to determine the weighted score and enter in Weighted Factor Scores column.
(2) Sum the weighted factor scores for the LE factors to determine the total LE score for the project.
(3) Sum the weighted factor scores for the SA factors to determine the total SA score for the project.
(4) Sum the total LE and SA scores to determine the Final LESA Score for the project.

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
Land Capability Classification	80.00	0.25	20.00
Storie Index	46.55	0.25	11.64
LE Subtotal		0.50	31.64
SA Factors			
Project Size	100	0.15	15
Water Resource Availability	100	0.15	15
Surrounding Agricultural Land	90	0.15	13.5
Protected Resource Land	100	0.05	5
SA Subtotal		0.50	48.5
		Final LESA Score	**80.14**

Land Evaluation Worksheet

Land Capability Classification (LCC) and Storie Index Scores

Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
118 - Capay clay, 0 to 1 percent slopes,	223.53	0.79	2s	80	63.20	35	27.65
252 - Stomar clay loam, 0 to 2 percent	60.72	0.21	2s	80	16.80	90	18.90
Totals	**284.25**	**1.00**		**LCC Total Score**	**80.00**	**Storie Index Score**	**46.55**

Site Assessment Worksheet 1

Project Size Score

	LCC Class I-II	LCC Class III	LCC Class IV-VIII
	223.53		
	60.72		
Total Acres	284.25	0	0
Project Size Scores	100	0	0

Highest Project 100

Site Assessment Worksheet 2 - Water Resources Availability

Project Portion	Water Source	Proportion of Project Area	Water Availability Score	Weighted Availability Score
1	Surface water	1	100	100
2				0
3				0
4				0
5				0
6				0
		1	**Total Water Resource Score**	100

Type	Acreage
Prime Farmland	612.56
Farmland of Local Importance	582.86
Farmland of Statewide Importance	0
Unique Farmland	6.56
Grazing Land	4.65
Urban and Built-up Land	167.26
Other Land	90.02
Total	1463.91

Acres in Ag	1206.63

Protected Ag	1320.91

Site Assessment Worksheet 3
Surrounding Agricultural Land and Surrounding Protected Resource Land

Zone of Influence						
Total Acres	**Acres in Agriculture**	**Acres of Protected Resource Land**	**Percent in Agriculture**	**Percent Protected Resource Land**	**Surrounding Agricultural Land Score**	**Surrounding Protected Resource Land Score**
1463.91	1206.63	1320.91	82%	90%	90	100