G. AGRICULTURAL RESOURCES

This section of the EIR was prepared based on review of the *Draft Laetitia Agricultural Cluster Management and Buffers Plan* (RRM Design Group, 2004) and consultation with the County of San Luis Obispo Agriculture Department. A copy of the *Draft Laetitia Agricultural Cluster Management and Buffers Plan* is provided in Appendix C of this EIR.

1. Existing Conditions

a. Regional Setting

According to the United States Department of Agriculture (USDA), California is the leading agriculture-producing state, with a total value of $25,737,173 for agricultural crops sold. (USDA 2002 Census of Agriculture State Profile). Top crops include forage (i.e., hay, haylage, grass silage, and greenchop), harvested vegetables, grapes, almonds, and cotton. Top livestock inventory items include broilers (and other meat-type chickens), layers, turkeys, cattle and calves, and ducks. In addition, nearly two billion board feet of commercial lumber are produced from California's private and public timberlands each year (USDA, NASS, California Field Office, 2007).

As of 2006, San Luis Obispo County ranked 15th in the state for overall agricultural production value, with a total value of $621,547,000 (USDA, NASS, California Field Office, 2007). Based on the 2007 San Luis Obispo County Department of Agriculture / Weights and Measures Annual Report, the number one commodity crop in San Luis Obispo County in 2007 was wine grapes, which was valued at $141,674,000. In addition to wine grapes, the top ten commodities in San Luis Obispo County were broccoli ($77,991,000), strawberries ($55,493,000), cattle and calves ($55,272,000), vegetable transplants ($34,679,000), head lettuce ($31,862,000), cut flowers ($28,555,000), indoor decoratives ($24,340,000), carrots ($22,505,000), and cauliflower ($17,426,000). The total value of vegetable, fruit and nut, nursery and seed, field, and animal commodities increased in value from $358,821,000 in 1998 to $653,870,000 in 2007. Wine grape value in 2007 constituted approximately 22 percent of the total commodity value (San Luis Obispo County Department of Agriculture; 2007).

b. Local Setting

Agricultural lands in the Arroyo Grande and Nipomo Valleys have been in long-term agricultural use, including ranching, orchards, vineyards, row crops, and grain crops. Prime agricultural soils are present within valleys and adjacent to historical creeks and tributaries, and highly productive soils are present throughout the area. Secondary agricultural uses include equestrian and livestock grazing. The project site is located within the Upper Los Berros Canyon, which supports a variety of agricultural uses including vineyards, orchards, and livestock grazing.

c. Laetitia Vineyard and Winery

1) Agricultural Production and Operations

The project site includes 633.5 acres of existing cultivated agricultural crops. Of that amount, 627.1 acres consist of irrigated grape vineyard, 4.9 acres consist of irrigated lemon orchard, and 1.5 acres consist of non-irrigated lavender. The vineyards include 409.13 acres of pinot noir,

57.11 acres of pinot blanc, 79.34 acres of chardonnay, 27.49 acres of tempranillo, 24.66 acres of syrah, 21.82 acres of pinot gris, and 3.6 acres of white Riesling (Laetitia Vineyards, 2007). An additional 694 acres (non-contiguous) is undeveloped, and is used for livestock grazing. Additional existing agricultural facilities on the project site include two farm support quarters, two irrigation ponds, composting areas, seven wells for agricultural and winery use, barns, agricultural roads, signage, and pipelines. None of the 21 parcels within the project site are within an Agricultural Preserve or under a Williamson Act Contract.

Operation of the vineyard does not currently require the use of Class I or Restricted Use Pesticides. A variety of pesticides, fungicides, and fertilizers are currently used on the vineyard (refer to Appendix G). Based on the applicant's proposed *Management and Buffers Plan*, the vineyard manager implements Integrated Pesticide Management (IPM) techniques to minimize the use of pesticides. The applicant's proposed IPM measures include creating habitat for beneficial insects and avian predators, using onsite weather stations and disease prediction models, and incorporating organic farming. The vineyard uses spraying to apply pesticides and fertilizers, which occurs between the hours of 9:00 P.M. and 7:00 A.M. via a low volume air blast sprayer with a capacity for 30 gallons per acre. The peak spray period is March through August, which requires two to four sprayers operating five nights a week. Additional activities within the vineyard include cultivating, irrigation, mowing, disking, ripping, plowing and seed sowing. Large machinery used within the vineyard and wine processing facility include tractors, ATVs, and trucks.

Weed control is implemented by the use of herbicides, hand hoeing, animal weed control, and mechanical weed control. Herbicides are applied using both conventional herbicide sprayers and low volume sprayers via ATVs and tractors. Animal control is provided by an existing fence surrounding the vineyard, use of bird netting, trapping, and providing habitat for avian predators.

2) Wine Processing and Tasting Room

The existing winery and tasting room are approximately 19,278 and 5,572 square feet in size. A 47-space parking lot and landscaped area are located adjacent to these structures. The facility and accessory buildings are located within a 1.8-acre area. The tasting room includes a wine tasting area, retail sales, storage, press area, and public restrooms. The tasting room is open from 10:30 A.M. to 5:00 P.M., each day of the week. Special events are limited to those currently occurring approximately six times per year, wine industry related, by invitation only, and limited to less than 200 guests. Domestic wastewater is treated by a septic system and leachfield. Black water generated by the winery is treated via an existing wastewater treatment pond. Pomace generated during wine processing is composted and tilled into the existing grape vineyards.

3) Agricultural Water Supply

There are thirteen existing wells and two reservoirs onsite (with a capacity of 25 acre-feet each). Five of these wells are currently used for vineyard and orchard irrigation, two are used for wine processing and domestic uses (tasting room facilities, residence, and farm support quarters). Two wells, currently unused, would serve the vineyard. The northern reservoir would be removed and relocated to the southwest portion of the project site to accommodate residential development. Irrigation lines are installed throughout the existing vineyards and orchard. Irrigation of the existing vineyard and orchard acreage requires approximately 180 to 200 acre-

feet per year (afy) (RRM Design Group, 2004). Irrigation is applied June through November, at a rate of 5 afy (minimum) to 54.5 afy (maximum) and may be extended during low rain fall years. Yield from the agricultural wells range from 260 to 500 gallons per minute (gpm) (Cleath & Associates, 2005).

d. Onsite Soils

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) assesses a soil's agricultural productivity by utilizing the land capability classification system and the California Revised Storie Index. The land capability classification system classifies soil units based on limitations for field crop production, the risk of damage due to crop production, and how the soil responds to management (refer to Table V.G.-1). The system has three tiers, including capability classes, sub-classes, and capability units. Capability classes range from 1 to 8, sub-classes include erosion (e); water (w); shallow, droughty, or stony (s), and; very cold or very dry (c).

The California Revised Storie Index rates each soil map unit based on the relative degree of suitability of a soil for general intensive agriculture. This rating is based on soil characteristics only, including soil depth, surface texture, subsoil conditions, drainage, salinity, erosion, and topography. The index is defined by a Grade system, ranging from 1 through 6 (refer to Table V.G.-2). The index ranges from less than 10 to 100. Grade 1 soils (California Revised Storie Index 80 to 100) are considered excellent for agriculture, and are considered prime soils. Grade 6 soils (California Revised Storie Index less than 10) are considered unsuitable for agriculture.

Based on the web soil survey mapping, 17 soil units are present within the project site (NRCS; accessed June 2008). The soil number, soil name, slope, class, California Revised Storie Index, and prime soil classification for each soil type within the project parcels are listed in Table V.G.-3 below. Figure V.G.-1 shows the existing soils onsite.

TABLE V.G.-1
Land Capability Classifications

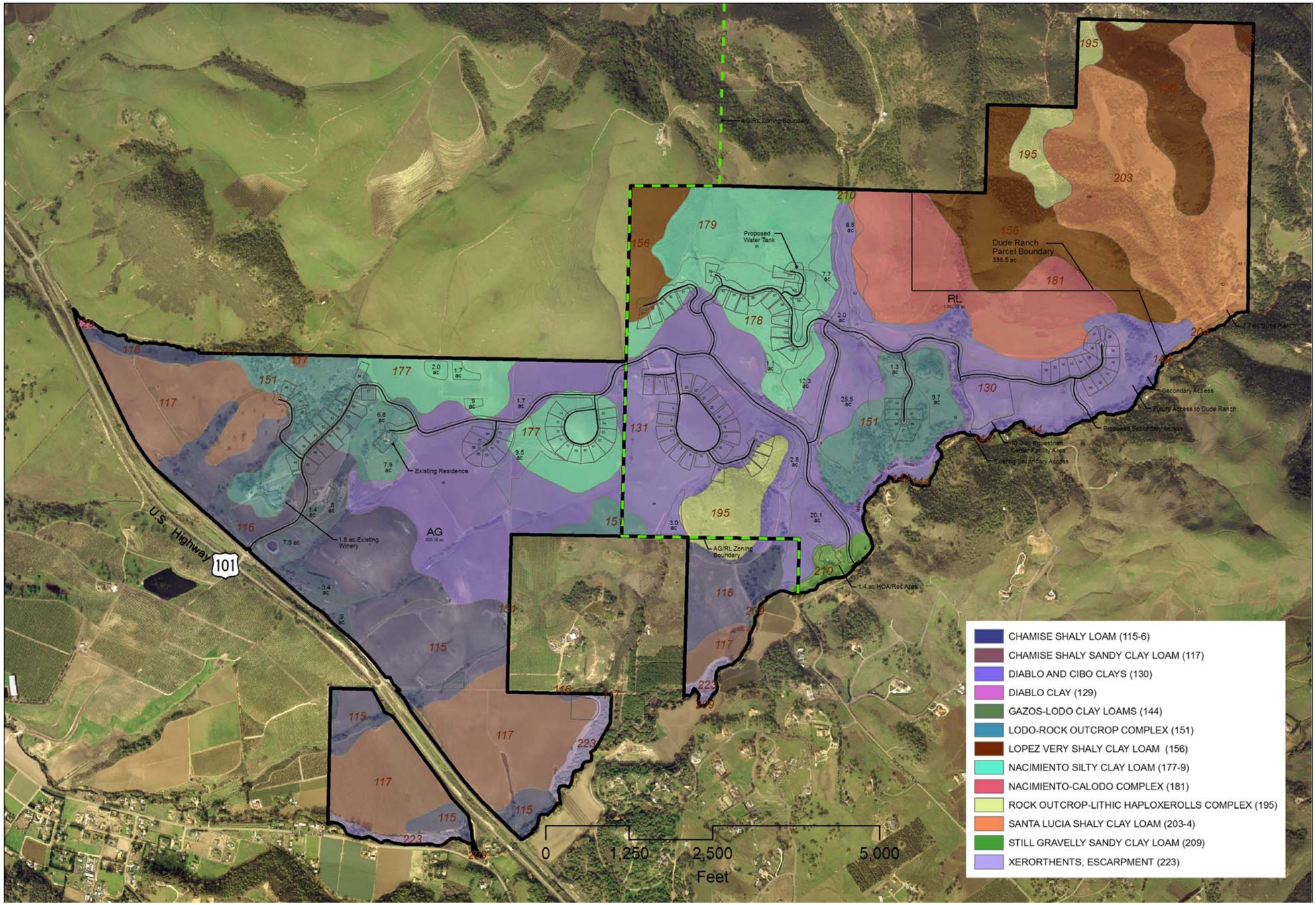
Class	Definition
1	Slight limitations that restrict use.
2	Moderate limitations that reduce the choice of plants or require moderate conservation practices.
3	Severe limitations that reduce the choice of plants or require special conservation practices, or both.
4	Very severe limitations that restrict the choice of plants or require very careful management, or both.
5	Little or no hazard of erosion but have other limitations, impractical to remove, that limit their use mainly to pasture, range, forestland, or wildlife food and cover.
6	Severe limitations that make them generally unsuited to cultivation and that limit their use mainly to pasture, range, forestland, or wildlife food and cover.
7	Very severe limitations that make them unsuited to cultivation and that restrict their use mainly to grazing, forestland, or wildlife.
8	Limitations that preclude their use for commercial plant production and limit their use to recreation, wildlife, or water supply or for esthetic purposes.

Source: United States Department of Agriculture Natural Resources Conservation Service (accessed June 2008))

TABLE V.G.-2
California Revised Storie Index

Group	California Revised Storie Index	Definition
1	80 to 100	Excellent – very minor or no limitations that restrict use of general agricultural use
2	60 to 79	Good – suitable for most crops, but have minor limitations that narrow the choice of crops and may require some special management practices
3	40 to 59	Fair – suited to fewer crops or to special crops and require careful management
4	20 to 39	Poor – limited to a narrow range of crops and require special management for intensive agriculture
5	10 to 19	Very Poor – generally not suited to cultivated crops by can be used for pasture and range
6	Less than 10	Non-agricultural – not suited to agricultural use

Source: United States Department of Agriculture Natural Resources Conservation Service (accessed June 2008).



Data Source: National Resource Conservation Service

NORTH
Scale as Shown

Soils Map
FIGURE V.G.-1

Back of V.G.-1

TABLE V.G.-3
Soil Types

Map Symbol	Map Unit	Slope	Class		CA Revised Storie Index	Farmland Classification
			Irrigated	Non-irr.		
115	Chamise shaly loam	9 to 15	6e	6e	24	Not prime
116	Chamise shaly loam	15 to 30	6e	4e	22	Not prime
117	Chamise shaly sandy clay loam	5 to 9	6e	6e	24	Not prime
130	Diablo and Cibo clays	9 to 15	3e	3e	42	Farmland of Statewide Importance
131	Diablo and Cibo clays	15 to 30	4e	4e	38	Not prime
144	Gazos-Lodo clay loams	30 to 50	6e/7e	7e	14	Not prime
151	Lodo-rock outcrop complex	9 to 30	4e/8	4e/8	10	Not prime
156	Lopez very shaly clay loam	30 to 75	7e	7e	7	Not prime
177	Nacimiento silty clay loam	15 to 30	4e	4e	49	Not prime
178	Nacimiento silty clay loam	30 to 50	6e	6e	26	Not prime
179	Nacimiento silty clay loam	50 to 75	7e	7e	13	Not prime
181	Nacimiento-Calodo complex	30 to 50	6e	6e	22	Not prime
195	Rock – Lithic Haploxerolls complex	30 to 75	8/7e	8/7e	<5	Not prime
203	Santa Lucia shaly clay loam	30 to 50	6e	6e	19	Not prime
209	Still gravelly sandy clay loam	0 to 2	2s	3s	68	Prime if irrigated
210	Still gravelly sandy clay loam	2 to 9	2e	3e	64	Prime if irrigated
223	Xerorthents, escarpment	n/a	6e	6e	19	Not prime

Source: Soil Survey of San Luis Obispo County, California Coastal Part, United States Department of Agriculture Soil Conservation Service (September 1984); Web Soil Survey, USDA (accessed May 2008)

e. California Department of Conservation Classification

The California Department of Conservation (DOC) Division of Land Resource Protection developed the Farmland Mapping and Monitoring Program (FMMP) in 1984 to analyze impacts to California's agricultural resources. Land is rated based on the land capability classification system, California Revised Storie Index, and land use.

Land designations include the following categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-up Land, and Other Land. The CDC considers Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance to be Important Farmland. These technical definitions are defined by the FMMP as followed:

- **Prime Farmland (P):** 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 during the four years prior to the mapping date.

- **Farmland of Statewide Importance (S):** 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 (U)**: 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 (L):** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

- **Grazing Land (G):** 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. The minimum mapping unit for Grazing Land is 40 acres.

- **Urban and Build-up Land (D):** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

- **Other Land (X):** 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, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

Based on the Important Farmland Map for San Luis Obispo County (CDC; 2002), Prime Farmland, Unique Farmland, Farmland of Local Importance, Grazing Land, and Other Land are located within the project site (refer to Figure V.G.-2). Farmland mapping is based on soils and use (e.g., crop production). A majority of the project site under vineyard production is mapped as Unique Farmland.

f. Farmland Conversion

Between the years 2002 and 2004, 1,671 acres of agricultural land was converted to non-agricultural use (refer to Table V.G.-4).

TABLE V.G.-4
San Luis Obispo County Farmland Conversion 2002-2004

Agricultural Land Use Category	Total Acreage Inventoried		2002-2004 Acreage Changes			
	2002	2004	Acres Lost	Acres Gained	Total Changed	Net Changed
Prime Farm Land	41,294	40,508	2,049	1,263	3,312	-786
Farmland of Statewide Importance	19,357	19,750	879	1,272	2,151	393
Unique Farmland	38,613	35,697	5,600	2,684	8,284	-2,916
Farmland of Local Importance	179,797	180,411	4,496	5,110	9,606	614
IMPORTANT FARMLAND SUBTOTAL	*279,061*	*276,366*	*13,024*	*10,329*	*23,353*	*-2,695*
Grazing Land	749,786	750,810	4,820	5,844	10,664	1,024
AGRICULTURAL LAND SUBTOTAL	*1,028,847*	*1,027,176*	*17,844*	*16,173*	*34,017*	*-1,671*
Urban and Built-up Land	41,361	42,124	151	914	1,065	763
Other Land	221,353	222,266	383	1,296	1,679	913
Water Area	10607	10602	5	0	5	-5
TOTAL AREA INVENTORIED	1,302,168	1,302,168	18,383	18,383	36,766	0

Source: California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, 2004.

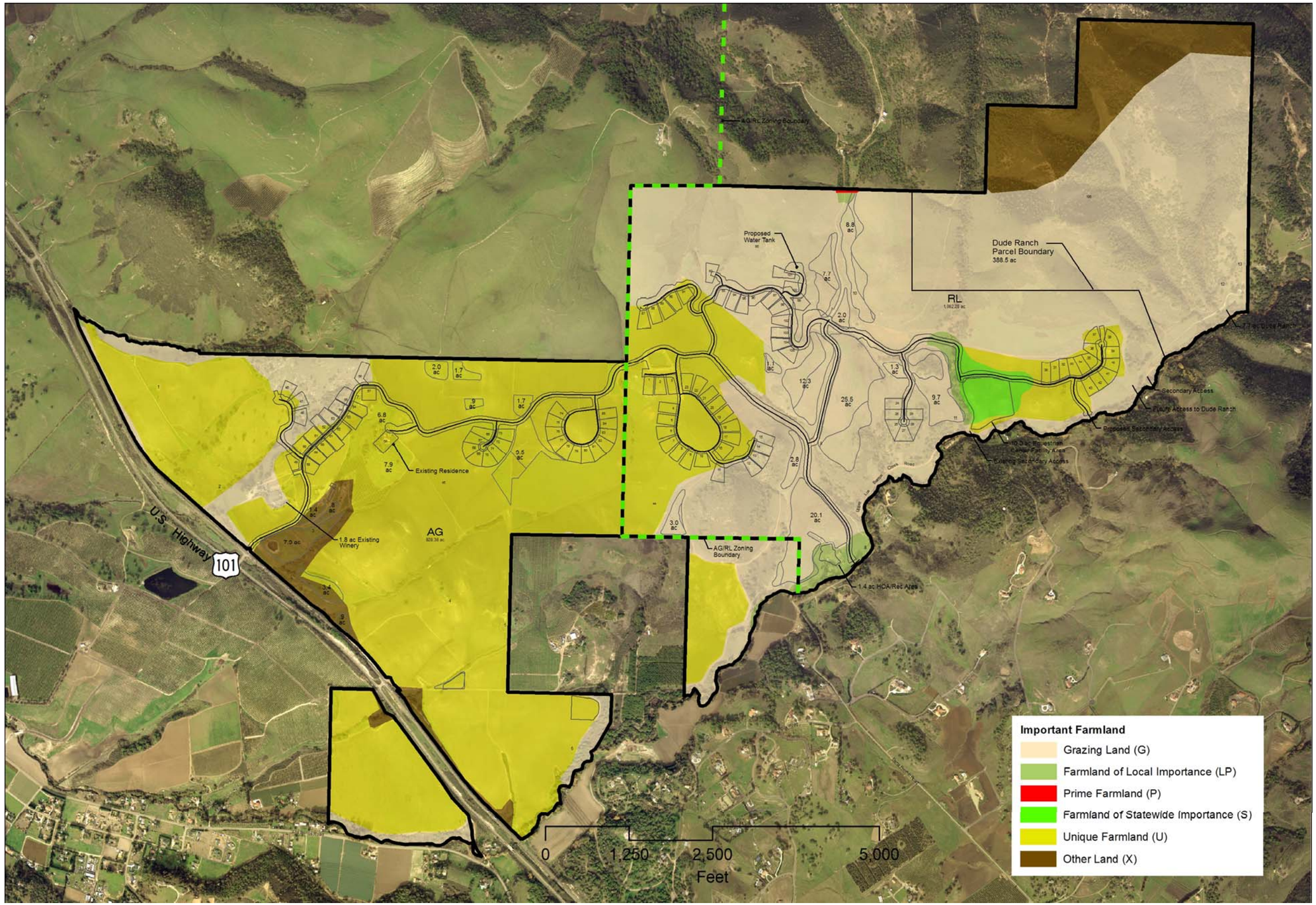
g. Williamson Act

The Williamson Act, also known as The California Land Conservation Act of 1965, is the State of California's primary conservation program for agricultural and open space lands. The voluntary program allows property owners to receive reduced property taxes in exchange for ten or 20 year commitments in the form of legally enforceable contracts to keep the property in agricultural production. The program is a two step process involving the establishment of an agricultural preserve by the local legislative body and then approval of a land conservation contract. Approximately 787,600 acres of county land is included in the program as contracted property.

None of the site's parcels are currently located within an agricultural preserve and none are under land conservation contracts. Three parcels immediately adjacent to the northern property boundary of the site are located within Arroyo Grande Agricultural Preserve No. 4 and are under land conservation contracts. The Assessor Parcel Numbers (APNs) are: 075-341-005, 047-301-001,and 047-071-007. Most of these three adjacent parcels are used for grazing; however, portions of the property are planted in irrigated avocado orchards. The three parcels initially qualified for the Williamson Act Program as grazing land. Today, the portion of this adjacent property planted in irrigated avocado orchards would qualify as prime farmland under the Williamson Act and the County's Rules of Procedure to Implement the California Land Conservation Act of 1965; however, the rest of the property is considered non-prime agricultural land.

The proposed subdivision's four agricultural parcels would need to be placed in agricultural preserve and land conservation contract to comply with Section 22.22.150B.8.a of the Land Use Ordinance (LUO). Since significant amounts of acreage in each of these four agricultural parcels are currently planted in irrigated vineyard, they would likely qualify for prime land preserves and land conservation contracts as irrigated prime land. The Rules of Procedure require 40 acres of irrigated prime land (or irrigated lands with other suitable soils that support high yield crops such as wine grapes) to qualify for a prime land agricultural preserve and at least 20 acres of irrigated vineyard or orchard on Class III, IV, VI, VII (or better quality) soils to qualify for an individual land conservation contract. The applicant proposes to put Lots 44 (477.89 acres), 45 (723 acres), 86 (205.63 acres) and 106 (380.83) under Williamson Act contracts and County agricultural/open space easements. These four lots would support existing agricultural uses, including the winery facility, tasting room, accessory structures, farm support housing, vineyards, orchards and grazing land.

New proposed uses within the open space/agricultural lots would include re-located vineyards and orchards, equestrian facility, and ranch headquarters including a recreation facility, community center, and homeowner's association facility. In addition, the applicant proposes to construct a dude ranch in the future. Pursuant to the LUO, structural uses allowed within the open space easement include a ranch/farm headquarters, residential accessory structures, farm support housing, preserved historic buildings, and agricultural accessory structures or agricultural processing uses (less than five acres in size) essential to the continuing agricultural production of food and fiber. Allowed non-structural uses include crop production, grazing, animal raising and keeping, specialized animal facilities, nursery specialties (non-structural), rangeland, wildlife preserves, water storage or recharge, leachfield, spray disposal area, scenic area protection, hazards area buffer, public outdoor recreation uses on non-prime lands, roads/turnarounds directly serving the agricultural use, and open space uses. The recreational facilities associated with the proposed ranch headquarters/homeowners association facility appear to be inconsistent with the LUO and Williamson Act regulations.



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

NORTH
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Farmland Map
FIGURE V.G.-2

Back of V.G.-2

2. Regulatory Setting

a. State Regulation and Policy

1) California Land Conservation Act (Williamson Act)

As defined by the DOC, the California Land Conservation Act of 1965 (Williamson Act) enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. As an incentive, landowners receive lower property tax assessments based on agricultural or open space land uses, as opposed to the real estate value of the land. Local governments receive a subsidy for forgone property tax revenues from the state via the Open Space Subvention Act of 1971.

b. Local Regulation and Policy

1) Agriculture and Open Space Element

The Agriculture and Open Space Element of the San Luis Obispo County General Plan provides a background on agricultural and open space resources within the county. Through the goals, policies, implementation programs, and measures provided within the document, the County's intent is: "to promote and protect the agricultural industry of the county, to provide for a continuing sound and healthy agriculture in the county, and to encourage a productive and profitable agricultural industry."

In addition, the County adopted an updated Agricultural Buffer Policy and Procedure Document (November 2005). The purpose of this document is to: 1) promote and protect agriculture; 2) protect the public's health and safety; and 3) provide the Board of Supervisors, Local Agency Formation Commission, school districts, and city councils with technical information, assistance, and buffer recommendations to address land use compatibility and issues affecting agriculture. Buffer recommendations provided by the County Agriculture Department are advisory, and made on a case-by-case basis within the established buffer policies and procedures.

2) San Luis Obispo County Right-to-Farm Ordinance

The San Luis Obispo County Right-to-Farm Ordinance (County Code Chapter 5.16) states that "the use of real property for agricultural operations including agricultural processing is a high priority and favored use." The ordinance states that: "it is the declared policy of this County to enhance and encourage agricultural operations, including agricultural processing within the County…[and] to provide to the residents of this County proper notification of the County's recognition and support through this ordinance of those persons' and/or entities' right to farm". The ordinance also states that: "where non-agricultural land uses occur near agricultural areas, agricultural operations frequently become the subjects of nuisance complaints due to lack of information about such operations. As a result, agricultural operators may be forced to cease or curtail their operations. Such actions discourage investments in farm improvements to the detriment of agricultural uses and the viability of the County's agricultural industry as a whole." The right-to-farm ordinance advises purchasers of residential and other property types adjacent to existing agricultural operations of the inherent potential nuisances associated with the purchase of such property. Concerns may include the noise, odors, dust, chemicals, smoke and hours of operation that may accompany agricultural operations.

3. Thresholds of Significance

a. CEQA Guidelines

The significance of potential agricultural impacts are based on thresholds identified within Appendix G of the CEQA Guidelines, and County of San Luis Obispo Initial Study Checklist, which provide the following thresholds for determining impact significance with respect to agricultural resources. Agricultural impacts would be considered significant if the proposed project would:

- Convert Prime Farmland, Unique Farmland, Grazing Land, 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.
- Impair agricultural use of other property or result in conversion to other uses.

4. Impact Assessment and Methodology

Impacts to agricultural resources was assessed by utilizing data and maps published by the United States Department of Agriculture, DOC, and County Agriculture Department, including soil information, farmland mapping, and economic data. The project was analyzed for the potential conversion of Farmland, loss of productive agricultural soils, incompatible land uses, and inconsistencies with regulations and policies intended to preserve agricultural resources.

The analysis of agricultural constraints included a review of GIS maps, local and state literature and records, consultation with the County Agriculture Department and the County Department of Planning and Building, and field visits to the project study area and the surrounding region. GIS data provided by the County were utilized to determine soil types and identify parcels within and adjacent to the project study area. These layers were joined with the project study area layer to quantify the acreage of affected soils, and agricultural use areas.

Documents used for the literature review included the *County of San Luis Obispo Annual Report*, the *County of San Luis Obispo General Plan Agriculture and Open Space Element*, and the *South County Area Plan*. Other documents included the *Natural Resources Conservation Service Soils Data for San Luis Obispo County*, the *CEQA Guidelines*, the *California Farmland Conversion Repor*t published by the DOC, and online resources, mapping, and data on the USDA website. Field visits were performed to assess existing land uses and potential constraints.

5. Project-specific Impacts and Mitigation Measures

a. Project-wide

The applicant proposes to implement an agricultural cluster project, which would create 102 residential lots and additional facilities and infrastructure within an area used for agricultural production of wine grapes, orchards, and livestock grazing. The proposed lots would extend throughout the project site, resulting in project-wide impacts to agricultural resources. Implementation of the proposed project would result in the conversion of approximately 230 acres of Farmland and Grazing Land to non-agricultural uses by constructing residential development, facilities, infrastructure, and by permanently removing crops to accommodate buffers. Within these 230 acres, the applicant proposes to remove approximately 113 acres of productive vineyards.

1) Conversion of Agricultural Land to Non-Agricultural Use

The proposed project includes 102 residential lots, ranch headquarters (homeowners association facility and recreational facilities), equestrian center, wastewater treatment ponds, and related infrastructure that would convert approximately 12.5 acres of land classified as Farmland of Statewide Importance, 3.0 acres of Farmland of Local Importance, 153 acres of land classified as Unique Farmland and 61.9 acres of Grazing Land would be converted to non-agricultural land uses (refer to Table V.G.-5). This Farmland, a total of 113 acres of existing productive vineyard crops would be converted to a non-agricultural use. Approximately half the residential lots proposed by the applicant would require removal and re-location of existing vineyard. Proposed lots requiring removal of 53 acres of vineyards to establish the lots would include Lots 1 through 10, 16 through 23, 30 through 43, 46, 47, 49 through 52, 57 through 64, 68, 69, and 87 through 91. An additional ten acres of vineyard would be removed to construct the equestrian facility, and three acres would be removed for treated effluent storage ponds 2 and 3. Approximately 41 acres of vineyards would also be removed to establish buffer zones between the residential development and agricultural areas. Removal of vineyards would not be required for future construction of the dude ranch.

TABLE V.G.-5
Conversion of Farmland

Farmland Designation	Acreage Converted by Residential Development[1]	Acreage Converted by Facilities[2]	Total Acres
Agriculture Land Use Category			
Unique Farmland	69.2	4.3	73.5
Grazing Land	7.6		7.6
Other Land		0.5	0.5
Subtotal Acres	*76.8*	*4.8*	*81.6*
Rural Lands Land Use Category			
Farmland of Statewide Importance		12.5	12.5
Farmland of Local Importance	1.6	1.4	3.0
Unique Farmland	79.0	0.5	79.5
Grazing Land	54.3		54.3
Subtotal Acres	*134.9*	*14.4*	*149.3*
Total Acres	211.7	19.2	230.9

[1] Includes lots, roads, and buffer area
[2] Includes HOA/ranch headquarters, equestrian facility, wastewater treatment facilities

The applicant proposes to place four lots totaling 1,787 acres under open space easements, as required by the agricultural cluster ordinance. The applicant proposes to place these lots under Williamson Act contracts. Prime Farmland, Unique Farmland, Farmland of Statewide and Local Importance, and Grazing Land would be included within the easements. Existing uses within the open space easements include the winery and hospitality structure, maintenance area, farm support structures, agricultural roads, and reservoirs. Proposed uses within the open space easements would include the ten-acre equestrian facility, 1.4-acre ranch headquarters/homeowners association facility, future dude ranch, wastewater treatment facility and three treated effluent storage ponds, and residential roads.

The applicant also proposes to plant approximately 140 acres of vineyard or orchards throughout the project site to replace the vineyards removed for structural development and establishment of proposed buffer zones. The soil types proposed for replacement are generally similar to the areas currently under production. The proposed vineyard replacement would partially, but not completely, offset the loss of productive vineyards because the long-term success and productivity of these replacement areas is unknown, while the permanent loss of currently productive areas is certain. The proposed homesites, and proposed buffer areas, would remain out of production for the life of the project. The permanent loss of productive Farmland would result in a significant, adverse, and unavoidable impact. In addition, if approved, removal of

production agriculture to accommodate residential development would set an adverse precedent in the County (Lynda Auchinachie, 2006).

AG Impact 1 **Implementation of the proposed project would result in the permanent loss of 12.5 acres of Farmland of Statewide Importance, 3.0 acres of Farmland of Local Importance, 153 acres of Unique Farmland, including 113 acres of productive vineyard, and 61.9 acres of Grazing Land. Implementation of the proposed project would set an adverse precedent in the county by resulting in the permanent conversion and loss of 113 acres of existing productive vineyard.**

No feasible mitigation measures are available that would mitigate impacts due to the loss of Farmland and productive vineyard. Impacts could be substantially reduced with redesign of the subdivision, including elimination of lots and development within proposed within productive areas.

Residual Impact Due to the lack of feasible mitigation measures, this impact would be considered *significant and unavoidable, Class I.*

2) Location of Development and Inadequate Land Use Buffers

Active, productive vineyards are present on the project site. The applicant proposes to locate the residential clusters, homeowner's association building/recreation center, and equestrian facility within and throughout the vineyards. According to the County Agriculture and Open Space Element Buffer Policies, the current standard required buffer between productive vineyards and residential uses is 200 to 600 feet (San Luis Obispo County; 2005). At the time the proposed project application was accepted for processing, the buffer recommendation for vineyards was 400 to 800 feet (San Luis Obispo County; 2002). One of the goals of agricultural buffers is to allow agriculturalists to continue historic agricultural practices. Upon review of the project, the County Agriculture Department recommended a buffer of 500 feet and that residences should be clustered in a compact and contiguous manner that would reduce the agricultural/residential interface (Lynda Auchinachie, 2004, 2008). Buffer distances are recommended to avoid or minimize potential land use conflicts and incompatibilities due to noise, odor, use of heavy equipment of access roads, trespass, and use of pesticides and fertilizers. Buffer distances are also recommended to minimize the spread of invasive species and pests within agricultural areas.

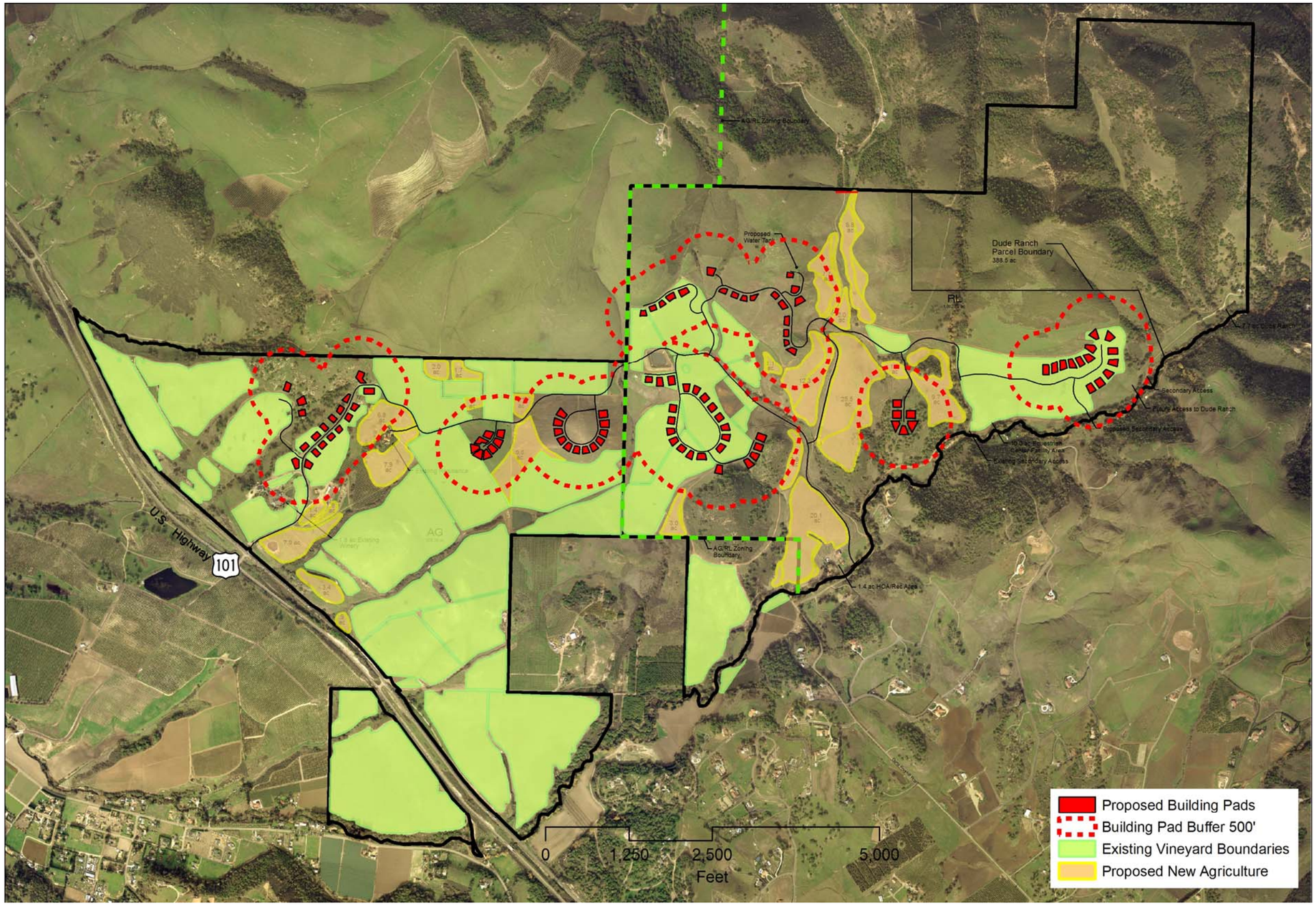
Proposed residential Lots 1 through 35, 42, 43, 46 through 54, 56 through 63, 65 through 85, 87 through 96, and 99 through 105 would be located less than 600 feet from existing and proposed vineyards. Out of these lots, fifteen lots would be located less than 200 feet to the southwest and 400 feet to the northwest, as measured from existing and proposed vineyards, including Lots 7, 28, 49, 58, 59, 70 through 73, and 77 through 82. These building envelopes for these proposed lots would be located at approximately the same elevation as the existing and proposed replacement vineyards to the northwest; the building envelopes would be approximately 50 feet in elevation above existing and proposed replacement vineyards to the southeast. Prevailing winds blow from the northwest to the southeast, which may maximize drift of dust and pesticides towards these lots when the wind is blowing in the prevailing direction. The time of year when

these winds prevail generally corresponds with the peak pesticide spray period (March through August).

Based on consultation with the County Agriculture Department, the proposed buffer distance for these lots would be inadequate, and inconsistent with the County's buffer policy (Lynda Auchinachie, 2006, 2008). In addition, the sprawling nature of the proposed development increases the agricultural/residential interface due to the location of proposed clusters, distance from central amenities, and use of shared roadways and residential roads adjacent to agriculturally productive areas. Residents living adjacent to production agricultural operations often cite nuisance complaints due to odors, noise, dust, and use of pesticides and fertilizers. Ongoing operation of the vineyard and winery facility could result in nuisances experienced by future homeowners, due to inadequate buffers between the different land uses. Due to the nature of the proposed development, and measures identified by the applicant to minimize land use conflicts, it can reasonably be assumed that operation of the vineyard would change to accommodate the needs of the future residences.

Implementation of the proposed project would provide housing for approximately 254 people (assuming 2.49 people per household). The design of the proposed project would result in small residential clusters spread throughout the existing vineyard, connected by access roads. Based on the traffic analysis prepared for the EIR, residential development would generate 1,049 daily trips, not including internal trips to the equestrian center and ranch headquarters/homeowners association facility. Residents may also use onsite residential and agricultural roads for recreational uses, including but not limited to equestrian use, bicycling, walking, or running. Increased populations within the vineyard would increase the potential for theft and vandalism. In addition, the increased presence of people on roads within the vineyards may interfere with normal agricultural management activities. In addition, due to the proximity of residential uses to vineyards, there is an increased potential for invasive species and pests to be transferred from landscape areas to the vineyards. The applicant's proposed regulation and inspection of landscape plants would not be a feasible, enforceable mitigation measure as only state and/or county officials have the authority to conduct such inspections. The applicant proposes to modify current agricultural practices within 500 feet of each residence, including the following:

- All vineyard work (pest control, vineyard floor maintenance, canopy management, and pruning with the exception of harvest) will be performed during daylight hours of 8:00 A.M. to 5:00 P.M., Monday through Friday. Harvest will be limited to handpicking during daylight hours only.
- Permanent cover crops will be established and maintained to minimize dust.
- All pest control will incorporate organic farming practices. Class I restricted pesticides would not be used within the 500-foot buffer zone. Pesticides classified by the U.S. Environmental Protection Agency as potential carcinogens would not be used.
- Vineyards will be maintained to a neat and orderly appearance. All trash will be picked up, and all tools and equipment will be transported back to the vineyard shop at the end of the workday. All the farm labor and employees would assemble at the vineyard shop daily, and would be transported throughout the ranch via company vehicles.



Source: Basemap, RRM Design Group, 2007

NORTH
Scale as Shown

County Recommended 500' Buffer
FIGURE V.G.-3

Back of Figure V.G.-3

The 500-foot buffer surrounding proposed residential building envelopes is shown in Figure V.G.-3. The applicant proposes to establish a homeowner's association that would manage the proposed equestrian center, security issues, common area landscaping, agricultural buffers, residential roads, and gates. The current vineyard manager would be designated the Agricultural Operator (AO), and would manage all onsite agricultural uses, the agricultural water supply and irrigation ponds, agricultural roads, green waste composting, and agricultural fencing and improvements. The homeowner's association would maintain the common area landscaping and agricultural buffers. The *Agriculture Management and Buffers Plan* includes protocol for communications between the homeowner's association and AO, including regularly scheduled meetings. Homeowner's association guidelines and conditions, covenants, and restrictions (CC&Rs) are proposed to include a copy of the County "Right-to-Farm Ordinance" and disclosure information regarding the surrounding agricultural operations, contact information, and mediation procedures.

These measures proposed by the applicant may reduce the potential for nuisances experienced by the residents; however these measures are not enforceable by the County and are not consistent with County Agriculture and Open Space Element policies to protect agricultural resources and operations, because historical and future agricultural practices will be restricted to accommodate incompatible development. In addition, it may not be feasible to comply with all proposed measures for the life of the project (i.e., the use of restricted pesticides may be necessary to manage invasive pests). Management of the vineyard, with the intent of reducing conflicts with the proposed residential use as opposed to the production of agricultural crops, may result in lowered crop yield and potentially the long-term viability of the operation.

AG Impact 2 **The non-contiguous nature of the proposed project and inadequate buffers between the existing agricultural use and proposed residential use and access roads would create land use conflicts, which would compromise the productivity of the existing agricultural operation.**

AG/mm-1 Prior to transfer of the parcels created by this subdivision, the applicant shall disclose to prospective buyers, of all parcels created by this proposal, the consequences of existing and potential intensive agricultural operations on adjacent parcels including, but not limited to: dust, noise, odors and agricultural chemicals and the county's Right to Farm ordinance currently in effect at the time said deed(s) are recorded.

AG/mm-2 Prior to issuance of construction permits for individual lot development, plans shall show that existing trees and vegetation located between residential building envelopes and agricultural areas shall be retained.

AG/mm-3 Prior to final acceptance of subdivision improvements, the applicant shall install no-climb fencing along the perimeter of existing and proposed vineyards, at the interface between residential uses, ranch headquarters, equestrian facility, and residential access roads.

Residual Impact Implementation of the mitigation measures identified above, in addition to the measures proposed by the applicant, would minimize potential conflicts; however, residual nuisance complaints and land use conflicts are expected to occur, which may further restrict agricultural operational practices within the vineyard. These conflicts would occur due to the inadequate buffers between inherently incompatible uses, and this impact would be considered *significant and unavoidable, Class I.*

3) Water Usage

Approximately 180 to 200 acre-feet per year is used to irrigate onsite vineyards. Currently, during the peak irrigation month (September), 54.5 acre-feet of irrigation water is applied to 627.1 acres of vineyards. As discussed in Section V.B. (Water Resources) of the EIR, the anticipated water demand for the proposed project would be up to 175.3 acre-feet per year (reasonable worst-case scenario). The wells used for agricultural irrigation and domestic purposes (i.e., residential use, ranch headquarters, equestrian facility, existing winery) would be separate. Based on the water analysis provided by the applicant (Cleath, 2005), there is sufficient yield in the underlying aquifers to provide for both agricultural and domestic uses. The water analysis notes that during prolonged droughts (three consecutive years with less than 10.7 inches of rain per year), excessive well pumping may result in the depletion of groundwater resources.

According to the *Management and Buffers Plan*, use of groundwater for irrigation may be limited during drought conditions. In the event of a water supply shortage, mandatory water conservation measures (listed in the applicant's proposed priority for implementation) would include: 1) increases in residential water rates and/or penalties to encourage water reductions; 2) a reduction or moratorium on irrigation for residential landscaping; 3) a reduction or moratorium on irrigation for common area and homeowners association facility landscaping (unless served by reclaimed water); 5) a prohibition on water use for swimming pools and spas; 6) mandatory water allocations for residential users; 7) potential purchase of water from an off-site party; and, 8) reduction or periodic cessation of agricultural irrigation.

The disposal of treated effluent (recycled water) at a rate of 33,000 gallons per day (three acre-feet per month) over 20.8 acres of vineyard would partially offset the demand for groundwater resources for agricultural irrigation. Implementation of additional water conservation measures recommended in this EIR (refer to Section V.B., Water Resources) would further reduce the project's water demand, and may limit the mandated restrictions on agricultural irrigation during drought conditions. Based on the data in the water analysis (Cleath, 2005) and implementation of recommended mitigation measures specific to water conservation, the water supply is adequate to serve existing agriculture, proposed agriculture, and the proposed project (Cleath, 2008).

However, in the event reduction or periodic cessation of agricultural irrigation occurs in order to ensure water supply for residential development and associated facilities, a significant and unavoidable impact to agricultural resources would occur. Requiring the applicant to avoid impacts to agricultural production, at the benefit of the proposed development, is not an enforceable mitigation measure, and would further impact agricultural production. Additional

water conservation measures are recommended, including avoiding cessation of agricultural irrigation at the benefit of domestic water supply, to further reduce the demand for water, and reduce the effects of water usage during prolonged drought periods (refer to Section V.B. Water Resources, and WAT/mm-1).

b. Phase One

1) Treated Wastewater (Recycled Water) Disposal

Water shortages in California have resulted in development of alternative reuse strategies. The SWRCB encourages reclamation and reuse of treated wastewater where feasible and beneficial. The Central Coast Basin Plan states:

> *"Where practicable, land disposal by spray irrigation shall be accomplished by proper reclamation techniques rather than by over-irrigation. This will aid water shortages and maximize nutrient removal. Treatment process selection for reclamation of wastewater is dependent upon the intended reuse. Where irrigation reuse or ground water recharge is intended, treatment requirements will depend on conditions described under land disposal. Clearly, the nature of the crop to be irrigated, soil percolation, and water characteristics are important considerations."*

Factors that affect siting of land disposal areas for treated wastewater include soils, groundwater location, and the type of crops when irrigation is involved. The Basin Plan includes standards and thresholds for concentrations of salts, nitrates, boron, pathogenic organisms, and toxic chemicals in recycled water. Operation of the proposed effluent disposal area would result in the disposal of 33,000 gallons per day over 20.8 acres of vineyard. Approximately three acre-feet per month would be applied year-round, including during the rainy season. Soil saturation, particularly during the rainy season, may affect crop viability. Based on consultation with the Regional Water Quality Control Board, the applicant would be required to identify a margin of safety and develop a contingency plan in the event the recycled wastewater cannot be used for irrigation due to wet weather conditions or soil saturation (Sorrel Marks, 2007). The applicant currently proposes to use the storage ponds during wet weather conditions; however, additional measures for disposal may be necessary during high rainfall years to avoid over-saturation and subsequent crop failure. Alternative methods of disposal may include, but not be limited to: supplemental holding capacity; disposal of recycled water within alternative areas of the vineyard (provided the location meets standard regulatory criteria); disposal within common areas or landscaping; and, percolation into underlying soils.

AG Impact 3 **Operation of the proposed treated effluent disposal area may result in soil saturation and subsequent crop failure.**

AG/mm-4 At the time of application for subdivision improvement plans, the applicant shall identify additional areas for treated effluent disposal, pursuant to Regional Water Quality Control Board review and approval. Alternative areas may include, but not be limited to: vineyards, orchards, and grazing land; and, common landscape areas.

Secondary Impact As discussed in Section V.D., Archaeological Resources, the use of the proposed effluent area may adversely affect significant archaeological resources, and mitigation measures include relocation of the proposed disposal site. Relocation of the effluent site shall include consideration of known archaeological resources, in addition to ensuring compliance with the Basin Plan and Regional Water Quality Control Board requirements.

Implement AR/mm-8.

Residual Impact With implementation of the above measure, this impact would be considered *less than significant with mitigation, Class II*.

c. Future Development

1) Dude Ranch

Soil types within the area proposed for the dude ranch are Diablo and Cibo clays (15 to 30 percent slopes) and Santa Lucia shaly clay loam (30 to 50 percent slopes). The Farmland Mapping and Monitoring Program maps this area as Grazing Land. These soil types are not considered prime, and this area does not currently support any type of agricultural production. The parcel immediately to the east is under Williamson Act contract. Operation of the dude ranch may result in the creation of equestrian trails within or adjacent to productive vineyards on the project site. Use of these trails, and temporary increases in population may adversely affect agricultural operations, or conflict with agricultural uses on adjacent parcels. The development proposal for the dude ranch will need to be analyzed in consultation with the County Agriculture Department upon the applicant's submittal of a land use application to determine specific impacts to agricultural resources and consistency with the County Agriculture and Open Space Element.

6. Cumulative Impacts

General Plan Amendments, subdivisions, and residential development in the South County area have resulted in the conversion of Farmland. Implementation of the proposed project would contribute to the cumulative conversion of agricultural land in the area, and the permanent loss of Farmland. Removal of productive crops to accommodate a large residential development would set a precedent in the county for this type of practice, which is inconsistent with the goals and policies of the *Agriculture and Open Space Element.* The proposed project is located within an agricultural and open space green belt between the City of Arroyo Grande and Community of Nipomo. Conversion of this property to a residential development would likely result in increased conflicts between agricultural and residential uses in the area, and may result in non-renewals of Williamson Act contracted lands on adjacent parcels. The proposed project is inconsistent with the County's Buffer Policy; development of this project as proposed would initiate a precedent for inadequate buffers between residential and agricultural land uses. In addition, the proposed project appears inconsistent with the County Land Use Ordinance and Agriculture and Open Space Element policies requiring preservation of 95 percent of land for agricultural production, because permanent buffers and construction of non-agricultural uses (i.e., recreational uses, wastewater treatment facility) are proposed within the area quantified by the applicant for preservation. The potential impacts to agricultural resources resulting from the

proposed project, and the precedent-setting nature of the proposed project would be considered cumulatively significant and adverse.

AG Impact 4 **Implementation of the proposed project would significantly contribute to the cumulative loss of productive Farmland.**

Implement AG/mm-1 through AG/mm-3.

Residual Impact With implementation of the above mitigation measures, impacts would be reduced; however, residual impacts would be considered *significant and unavoidable, Class I.*

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