

4.2 AGRICULTURAL RESOURCES

4.2.1 INTRODUCTION

This section describes and evaluates the potential agriculture impacts related to development of the Hyatt Place project (project), and proposes cumulative mitigation measures to reduce potentially significant cumulative impacts. Information regarding agricultural resources was obtained from the following sources:

- State Important Farmland Map, 2016
- City of Half Moon Bay Local Coastal Program & Land Use Plan, 2021
- Natural Resource Conservation Service (NRCS) prepared the Prime Soils Map for San Mateo County, 2009
- Custom Soil Resource Report for San Mateo Area, California, created August 2019

Project consistency with the 2021 Local Coastal Land Use Plan (LCLUP) is analyzed and included below. The LCLUP was updated and adopted by City Council in October 2020 and certified by the California Coastal Commission (CCC) in April 2021. The updated LCLUP comprises the City's reexamined and updated policy approach for carrying out the Coastal Act in a manner that addresses changed conditions since certification of the 1996 LCLUP.

All documents referenced in the draft EIR are available via CD or weblink upon request. The location of the other reference materials is cited at the end of this section. Hard copies of the draft EIR are located at the City of Half Moon Bay, Planning Division, 501 Main St, Half Moon Bay, CA 94019.

No comments were received regarding agricultural resources in response to the Notice of Preparation for this draft Environmental Impact Report (EIR).

4.2.2 EXISTING CONDITIONS

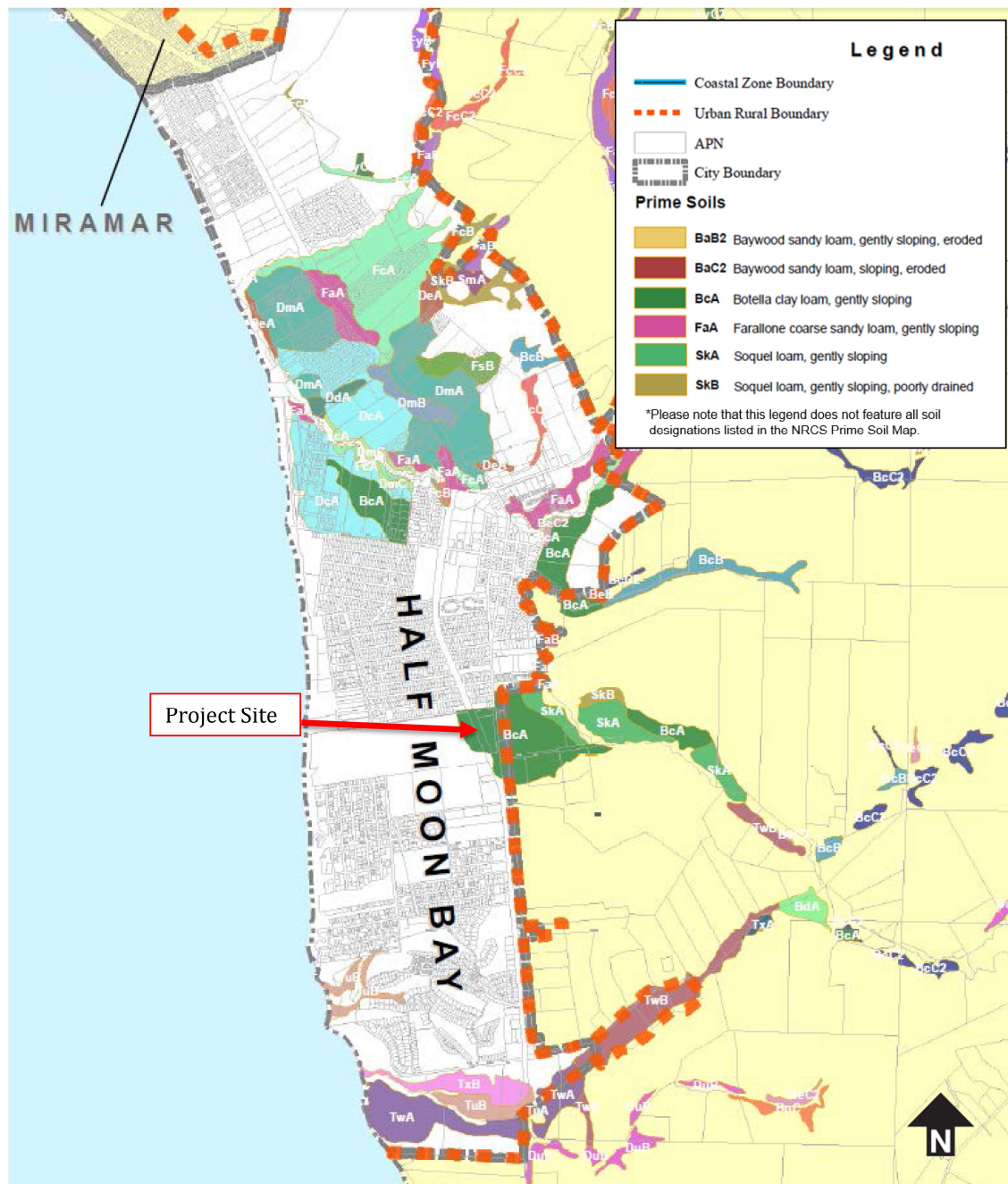
The project site is a 5-acre parcel that was actively farmed until 2013. Since then, it has remained in an undeveloped state with occasional maintenance occurring on the grounds, such as discing and mowing. Although the site was an active farm until 2013, it is not included on the State inventory of important farmlands. However, to the west of the project site on non-contiguous lands is an area that has State-designated "farmland of local importance" and to the east of the project site is an area of State-designated "prime farmland" (in unincorporated San Mateo County). Both agricultural areas are actively

cultivated. In addition, the Natural Resource Conservation Service (NRCS) prepared the Prime Soils Map for San Mateo County (2009) and the soil on the project site is categorized as gently sloping Botella clay loam (BcA), a Class I/II soil and rated between 80 and 100 on the agricultural soil rating scale known as the Storie Index. Refer to **Figure 4.2-1**.

The vegetation on the project site is classified as ruderal, serves as a foraging area for birds, and it is not known to support any particular species. Refer to **Section 4.4, Biological Resources**, for the full discussion of the biological context of the project site.

Half Moon Bay has active farmlands supporting a variety of crop types including: horticulture, foods and other types of crops. The zoning designation for the project site is Planned Unit Development (PUD) and zoning for the surrounding area is a combination of PUD, Residential (R2 and R3), Open Space Reserve, Public Service, and General Commercial.

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NRCS Prime Soils Map for San Mateo County

Figure

4.2-1

Source: US Department of Agriculture, Natural Resource Conservation Service (NRCS), 2019. County of San Mateo, Prime Soils Map.

4.2.3 REGULATORY SETTING

Federal

Farmland Policy Protection Act

The Natural Resources Conservation Service, a division of the United States Department of Agriculture, oversees and implements the Farmland Protection Policy Act (FPPA). Congress passed the Agriculture and Food Act of 1981 (Public Law 97-98) containing the FPPA subtitle I of Title XV, Section 1539-1549. The FPPA is intended to minimize the impact Federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It assures that to the extent possible federal programs are administered to be compatible with state, local units of government, and private programs and policies to protect farmland. Federal agencies are required to develop and review their policies and procedures to implement the FPPA every two years.

Project Consistency

The FPPA only applies to projects with federal actions or activities. The project does not include any federal activities.

State

Farmland Mapping and Monitoring Program

In 1982, the Farmland Mapping and Monitoring Program (FMMP) was established by the California Department of Conservation, Division of Land Resources Protection. The FMMP provides a consistent and impartial analysis of agricultural land use and land use changes throughout California and produces Important Farmland Maps by county every two years. However, due to budget constraints, the maps are no longer updated at regular intervals and the most recent map for San Mateo County is 2016.

The FMMP has four farmland classifications of importance which are: Prime Farmland, Farmland of Statewide Importance, Unique Farmland and Farmland of Local Importance.

Project Consistency

According the 2016 State Important Farmland Map for San Mateo County, the project site is designated as “other.” Refer to **Figure 4.2-2**. Therefore, the project would not result in a consistency issue or impact to State-designated farmland or the FMMP.

Williamson Act

The California Land Conservation Act, also known as the Williamson Act, was adopted in 1965 in order to encourage the preservation of the State's agricultural lands and to prevent its conversion to urban uses. In order to preserve these uses, this Act established an agricultural preserve contract procedure by which the landowners pay State taxes at a lower rate using a scale based on the actual use of the land for agricultural or open space purposes, as opposed to its unrestricted market value.

Project Consistency

Not applicable. There are no Williamson Act contract lands in Half Moon Bay.

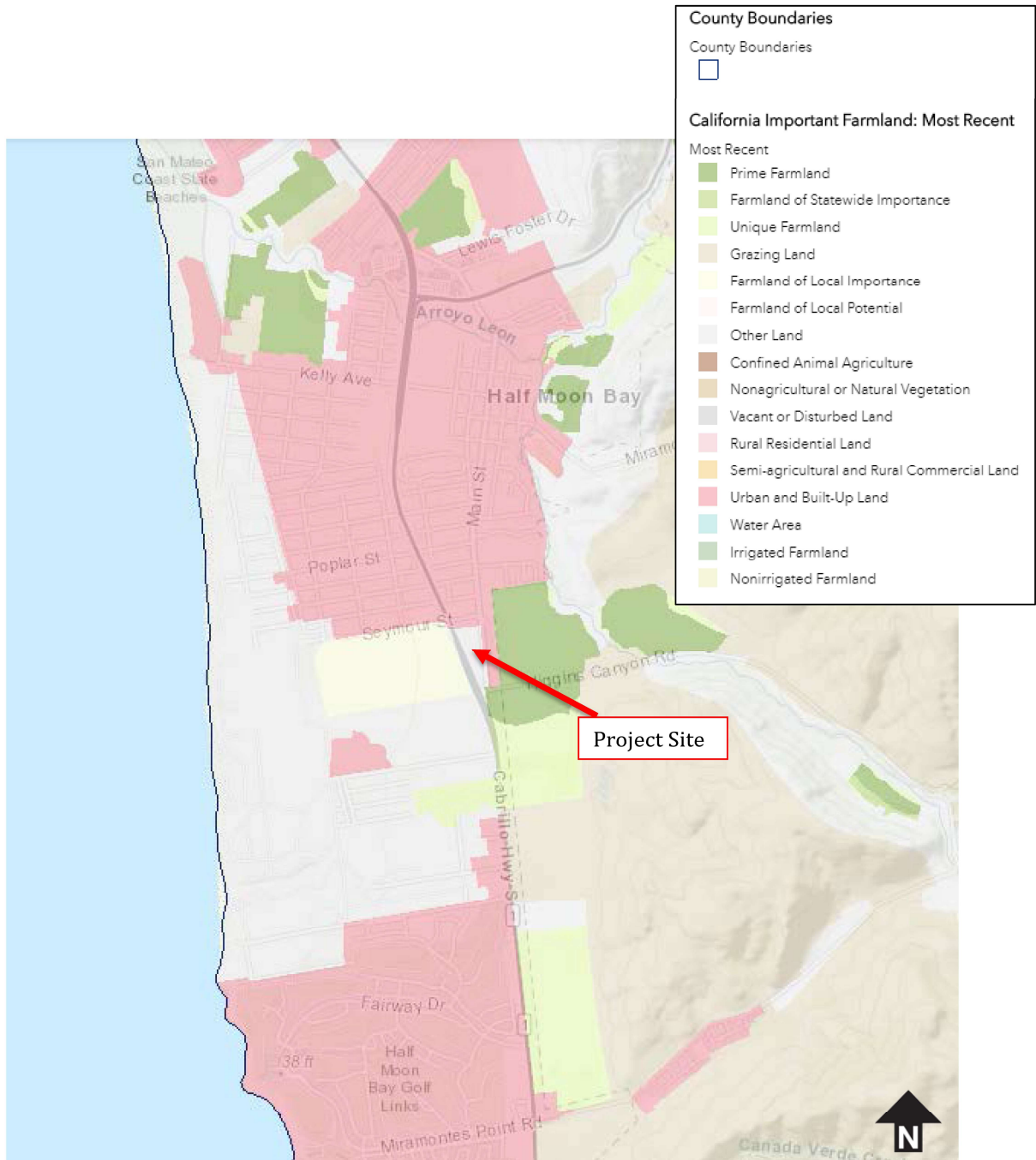
California Coastal Act

The California Coastal Act (CCA) provides protection for viable and prime agricultural land in the Coastal Zone. The Act defines "prime agricultural land" as consistent with subsections 1, 2, 3, or 4 of Government Code Section 51201(c), as follows:

(c) "Prime agricultural land" means any of the following:

- (1) All land that qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classifications.
- (2) Land which qualifies for rating 80 through 100 in the Storie Index Rating.
- (3) Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture.

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California Important Farmland – Half Moon Bay

Figure

4.2-2

Source: California Department of Conservation, 2016. California Important Farmland Finder.

(4) Land planted with fruit- or nut-bearing trees, vines, bushes, or crops which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars (\$200) per acre.

Project Consistency

The project site meets the definition for Prime Agricultural land under both (c)(1) and (2) above based on **Figure 4.2-1**. Also, the LCLUP is a document prepared under the CCA and it uses this definition for identifying prime agricultural land. Based on the above, the project site is considered Prime Agricultural land. In addition, the project site is designated as having prime soils¹ by NRCS (**Figure 4.2-1** Prime Soils Map for San Mateo County). Development of the site would result in the loss of approximately 3.05 acres of Prime Agricultural Land in the Coastal Zone. Refer to **Section 4.2.4, Impacts and Mitigation Measures**, for a complete discussion on this impact and its policy implications.

Local

Half Moon Bay LCLUP

The Half Moon Bay LCLUP and the Local Coastal Implementation Plan (IP) together constitute the "Local Coastal Program" (LCP) for the city. The LCLUP, which is the policy component of the LCP, contains policies for agricultural resources.

Table 4.2-1 highlights the most relevant agriculture policies from Chapter 4 of the LCLUP that are applicable to the project.

¹ The project site contains Botella clay soils – level (BcA). BcA has a soil classification rating (Storie Index) of 81 and is known for well drained and excellent soil for agricultural uses, especially when irrigated.

Table 4.2-1 Project Consistency with Relevant LCLUP Policies

LCLUP Policy Number	LCLUP Policy	Project Consistency
<i>LCLUP Chapter 4 Agriculture</i>		
4-9: Conversion of Prime and Non-Prime Agricultural Land	<p>Conversion of prime and nonprime agricultural land within the Town Center shall be permitted for anticipated urban development. Prohibit the conversion of prime and non-prime agricultural land outside the Town Center, including as shown on Figure 4-1, to a new non-agricultural use (excluding agricultural compatible and supplemental uses as defined in this chapter) unless all of the following can be demonstrated:</p> <ul style="list-style-type: none"> a. All agriculturally unsuitable lands on the parcel have been developed or determined to be undevelopable; b. Continued or renewed agricultural use of the soils is not feasible as defined by Section 30108 of the Coastal Act; c. Clearly defined buffer areas shall be provided on the site between the new nonagricultural use and adjacent agricultural uses to ensure the continued productivity of agricultural uses; d. The productivity of any agricultural lands adjacent to the new non-agricultural use is not diminished; and <p>Public service and facility expansions associated with the new non-agricultural use will not impair agricultural viability, including by increased assessment costs or degraded air and water quality.</p>	<p>Consistent. The project site is mapped for Prime soils, is located within Town Center, and anticipated for conversion. Environmental review included assessment of the site for on-going agricultural operations and determined that while agricultural soils would be lost, the agricultural use had already ceased thereby contributing to the conversion of the farmland to non-agricultural use.</p>

LCLUP Policy Number	LCLUP Policy	Project Consistency
4-10: Mitigation for Conversion of Agricultural Lands	All conversions of prime and non-prime agricultural lands to a new non-agricultural use, excluding farmworker housing, agricultural compatible uses, and supplemental uses as defined in this chapter such as habitat restoration and recreation, shall be mitigated at a ratio to be established based on the quality of agricultural lands converted, their location, and other relevant factors as evaluated in a report prepared by a qualified professional for the City's review and approval. Methods for mitigation may include but are not limited to establishing agricultural conservation easements, soil restoration, or in lieu fees in partnership with land trust and conservation agencies. Protection or restoration of agricultural lands within city limits is preferred; followed by lands within the coastal zone of unincorporated San Mateo County and finally by other coastal zone areas.	Consistent. The approximately 5 acre project site is mapped for Prime soils. Approximately 2 acres of the site are or will be devoted to wetlands, wetland buffers, and/or restoration in association with wetlands. The project is therefore required to mitigate for the loss of about 3 acres of prime agricultural soils which can be accomplished through a variety of ways. The City will review the applicant's proposed approach to mitigation before considering project approval and any approval will comply with this policy.

Source: City of Half Moon Bay, LCLUP 2021.

4.2.4 IMPACTS AND MITIGATION MEASURES

Thresholds of Significance

The following thresholds of significance criteria for agricultural resources were derived from the Environmental Checklist in the *California Environmental Quality Act (CEQA) Guidelines Appendix G*. These thresholds of significance have been amended or supplemented, as appropriate, to address lead agency requirements and the full range of potential impacts related to this project.

An impact of the project would be considered significant and would require mitigation if it would meet one of the following thresholds:

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

Methodology

To determine potential impacts, the impact thresholds of significance identified above were applied to construction and operation of the project. The evaluation is based on existing conditions and applicable planning documents listed above. The analysis takes into consideration both the potential direct impacts of the project, as well as indirect impacts of the project in the context of the General Plans and the LCP. The Half Moon Bay LCLUP and the zoning ordinance together constitute Half Moon Bay's LCP for the coastal zone.

In addition, Circlepoint prepared a Land Evaluation and Site Assessment (LESA) of the project site which will be discussed in more detail under **Agriculture c)**.

Discussion of Impacts

Agriculture a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The project site is not classified as an important farmland type on the State's Important Farmland Map for San Mateo County. The site is designated "Other", as shown on **Figure 4.2-1**. Therefore, the project would have no impact on these resources.

Agriculture b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

Less than Significant. The project site is currently designated as a Commercial General and zoned PUD/Commercial. The PUD/Commercial zone is not intended for agricultural uses, but is specifically for anticipated development. Additionally, the CCA permits the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.² The City's certified LCLUP also anticipates conversion of agricultural lands within the Town Center to other uses; the project site is within Town Center. There are no existing Williamson Act contracts in the City. Therefore, the project would have no impact on zoning intended for agricultural use, or Williamson Act contracts.

Agriculture c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use?

Less than Significant. Based on past agricultural uses and the prime agricultural soils on the project site, and the fact that the project site has prime agricultural soils, the project would incur the loss of 3.05 acres of prime agricultural soils. This loss is a permanent loss of a non-renewable resource. However, the agricultural use on the site was discontinued in 2013. Therefore, while the prime agricultural soils would be lost, the agricultural use had already ceased thereby contributing to the conversion of the farmland to non-agricultural use. As stated above, the CCA permits the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with other areas with adequate public services and where it will not have significant adverse effects. Consistent with CCA, the

² California Coastal Commission, 2021. Public Resources Code Division 20, California Coastal Act, Chapter 3, and Chapter 4. Available: <https://www.coastal.ca.gov/coastact.pdf>, Accessed: January 2022.

City's certified LCLUP anticipates such conversions within Town Center. Therefore, the proposed project would be aligned with the CCA.

Based on the limited size of the parcel and its isolated context, a LESA evaluation was conducted in accordance with California Agricultural Land Evaluation and Site Assessment Model (NRCS, 1997). The LESA Model is designed to make determinations of the potential significance of a project's conversion of agricultural lands. The LESA takes into account the soil type, irrigation availability, parcel size and surrounding land uses. The LESA evaluation for the project site can be found in **Appendix B, California Agricultural LESA Worksheets**.

A single LESA score is generated for a given project after all the individual Land Evaluation and Site Assessment factors have been scored and weighted. Just as with the scoring of individual factors that comprise the California Agricultural LESA Model, final project scoring is based on a scale of 100 points, with a given project being capable of deriving a maximum of 50 points from the Land Evaluation factors and 50 points from the Site Assessment factors. Based on the LESA worksheet, the parcel scored a 36. LESA scores of 39 or less are "not considered significant." As the project is aligned with the CCA and would not be considered significant using the California Agricultural LESA Model, therefore, the proposed project would have a less than significant impact to the conversion of existing agricultural lands.

4.2.5 CUMULATIVE IMPACTS

Cumulative impacts occur when two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. As discussed above, there are two aspects of impacts to agricultural resources that must be evaluated, a) the loss of agricultural soils; and b) the applicable land use policies related to agricultural operations. These two aspects along with the consideration of agricultural conversion trends are how cumulative impacts to agricultural resources are evaluated.

The loss of prime agricultural soils within Half Moon Bay and San Mateo County is considered a significant cumulative impact because of loss of a non-renewable resource.

As discussed above, a LESA evaluation was prepared for the project. Based on the LESA evaluation, there are other active agricultural uses that are located within the City limits outside the urbanized Downtown area that continue to be more appropriate for agricultural uses; the project applicant will mitigate for lost prime soils to support San Mateo County coastal agriculture; and the intended development of the project site is noted in the LCLUP. Additionally, the City has adopted Policy 4-10 consistent with CCA policies for

prioritizing preservation of agricultural uses in the City and regionally. Consistent with Policy 4-10, the project applicant will implement **Mitigation Measure Cumulative AG-1** for the loss of the limited area of prime soils by supporting the San Mateo Resource Conservation District or other City approved means of providing agricultural land protections or soils restoration.

Mitigation Measure Cumulative AG-1: All conversions of prime and non-prime agricultural lands to a new non-agricultural use, excluding farmworker housing, agricultural compatible uses, and supplemental uses as defined in the Half Moon Bay Local Coastal Land Use Plan such as habitat restoration and recreation, shall be mitigated at a ratio to be established based on the quality of agricultural lands converted, their location, and other relevant factors as evaluated in a report prepared by a qualified professional for the City's review and approval. Methods for mitigation may include but are not limited to establishing agricultural conservation easements, soil restoration, or in lieu fees in partnership with land trust and conservation agencies. Protection or restoration of agricultural lands within city limits is preferred; followed by lands within the coastal zone of unincorporated San Mateo County and finally by other coastal zone areas.

Therefore, the loss of 3.05 acres of prime agricultural soils is not a considerable contribution to a significant cumulative impact to loss of agricultural uses and prime soils for the City and San Mateo County coastal agricultural operations.

4.2.6 REFERENCES

California Coastal Commission, 2021. Public Resources Code Division 20, California Coastal Act, Chapter 3, and Chapter 4. Available: <https://www.coastal.ca.gov/coastact.pdf>, Accessed: January 2022.

State Farmland Mapping and Monitoring Program Website, www.nrcs.usda.gov/wps/portal/nrcs/detail/?cid=nrcs143_008275. Accessed: January 2022.

Natural Resource Conservation Service Soil Survey Website: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>, Accessed: January 2022.

Natural Resource Conservation Service, County of San Mateo Prime Soils Map, 2009.

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