AGRICULTURAL CONVERSION AND FOREST RESOURCES STUDY

CITY OF BAKERSFIELD

GREENFIELD UNION SCHOOL DISTRICT

MARCH 2022

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GREENFIELD UNION SCHOOL DISTRICT

Prepared for:

Swanson Engineering
2000 Oak Street, Suite 150
Bakersfield, CA 93301

Consultant:

5080 California Avenue, Suite 220
Bakersfield, CA 93309
Contact: Jaymie Brauer
Phone: (661) 616-2600
Fax: (559) 733-7821

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ACRONYMS AND ABBREVIATIONS

CEQA	California Environmental Quality Act
DOC	California Department of Conservation
FMMP	Farmland Mapping and Monitoring Program
FPPA	Farmland Protection Policy Act
KCGP	Kern County General Plan
LCC	Land Capability Classification System
LESA	Land Evaluation and Site Assessment
MBGP	Metropolitan Bakersfield General Plan
USDA	United States Department of Agriculture
WRCC	Western Regional Climate Center
ZOI	Zone of Influence

SECTION 1 - INTRODUCTION

1.1 - Purpose and Methods of Assessment

This study is an Agricultural Conversion and Forest Resources Study prepared for the development of a school district office on approximately 19.35-acre parcel in Bakersfield, California (project) to be developed by Swanson Engineering (Applicant). The project site is located in the City of Bakersfield and within the Metropolitan Bakersfield sphere of influence and is approximately 0.96 miles east of Kern County (Figure 1-1 and Figure 1-2). The Lead Agency for this project is the City of Bakersfield. The project consists of 2 parcel, with a project area totaling approximately 19.35 acres.

Projects involving changes in land use sometimes convert agricultural lands and/or forest resources to non-agricultural uses. Conserving forest resources, including the ecosystem provided by forests and protecting populations impacted by urban/forest interface is an important consideration in land use decisions. In addition, conserving productive agricultural lands requires a careful project-specific evaluation of the direct and indirect effects, as well as the cumulative effects of the agricultural land conversion.

The project site does not have the potential to impact forest resources, therefore, forest resources will not be discussed in detail in this study. However, the project does have the potential to impact agricultural resources. This study provides a discussion of considerations for those analyzing the proposed project site.

1.1.1 - AGRICULTURAL RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, the California Agricultural Land Evaluation and Site Assessment Model (LESA) (1997) prepared by the California Department of Conservation (DOC), may be used as a tool to assess the significance of impacts on agricultural resources and farmland conversion.

This study was prepared in the context of the California Environmental Quality Act (CEQA) (California Public Resources Code Sections 21000 et seq.) using the LESA model and also follows the guidelines prescribed by the City of Bakersfield and Kern County in their *Guidelines for Agricultural Soils/Farmland Conversion Studies*.

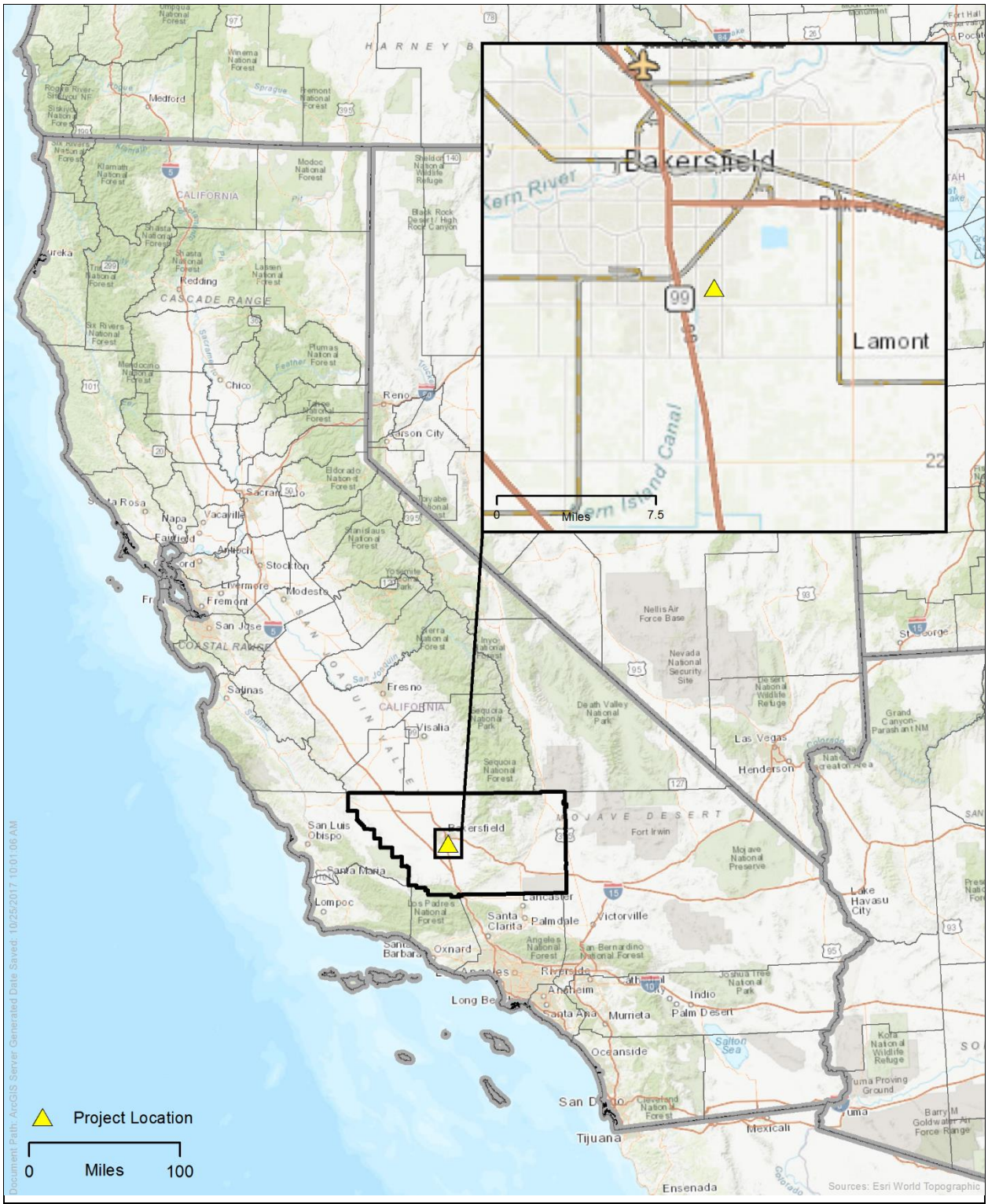

Figure 1-1
Regional Location

Figure 1-2
Project Site

1.2 - Project Description

1.2.1 - LOCATION

This Agricultural Conversion Study evaluates the conversion of approximately 19.35 acres of land used for agricultural purposes for the use of Greenfield Union School District office (commercial) project. More specifically, the site is located on the north side of Fairview Road approximately 0.12 miles from the intersection of Monitor Street and Fairview Road in City of Bakersfield. The parcel involving the project is shown in Figure 1-2. The project site's section, township, and range are identified below (Table 1-1). Table 1-1 also indicates whether the parcel is subject to a Williamson Act Land Use contract (WALUC). The topography of the site is relatively flat (Figure 1-3). The land is located within the Metropolitan Bakersfield General Plan (MBGP) (Figure 1-4).

The project site may be specifically identified by City of Bakersfield Assessor's Parcel Number listed below.

Table 1-1
Project Site Information

Township, Range and Section	Assessor's Parcel Number	Specific Plan (Figure 1-4)	Zoning (Figure 1-5)	Site Acreage	WALUC
T30S, R28E, Section 19	412-010-58	Low Density Residential (LR)	R-1	17.32	N
T30S, R28E, Section 19	412-010-57	Low Density Residential (LR)	R-1	2.03	N

Source: City of Bakersfield GIS data

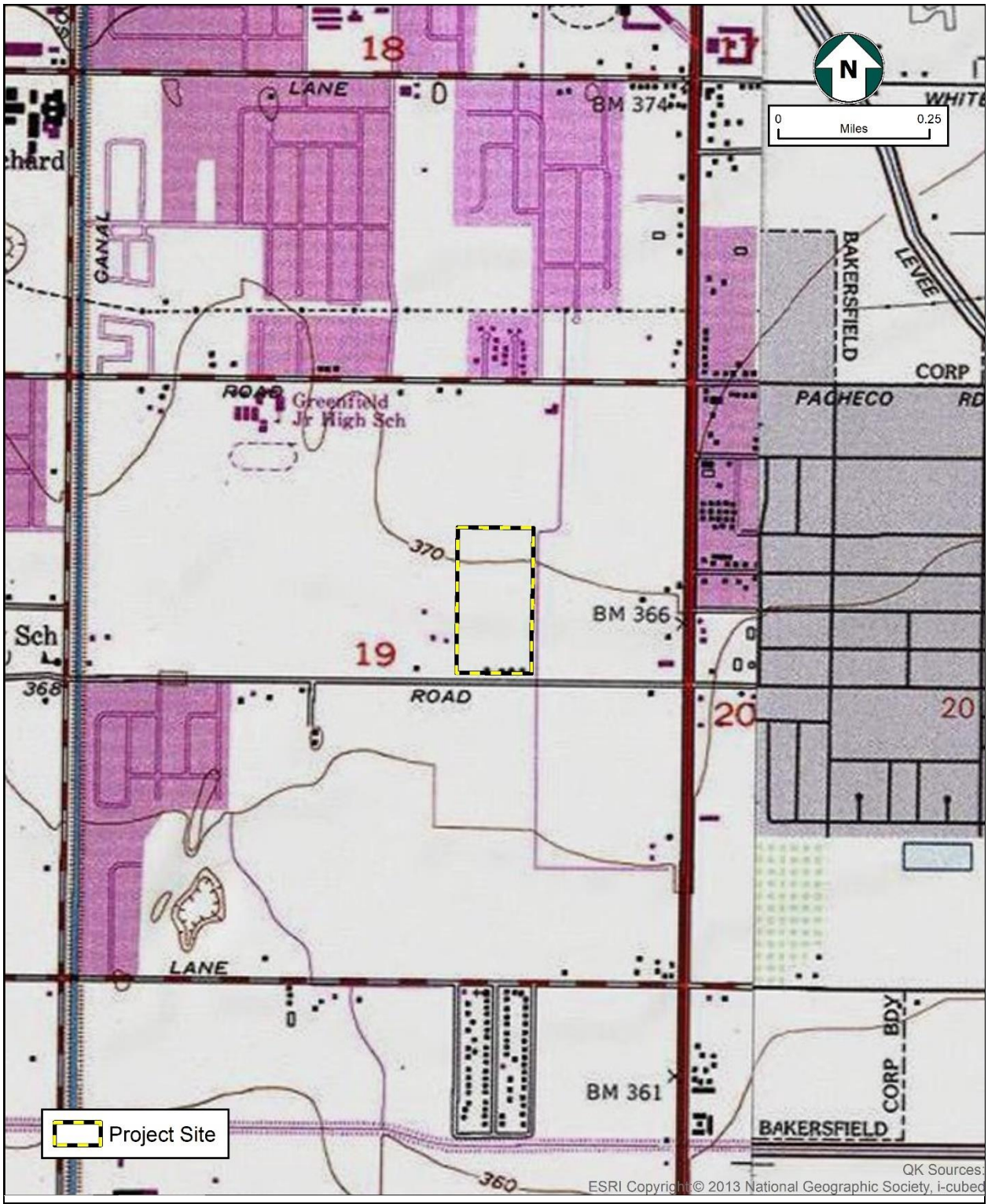

Figure 1-3
Topographic Base Map

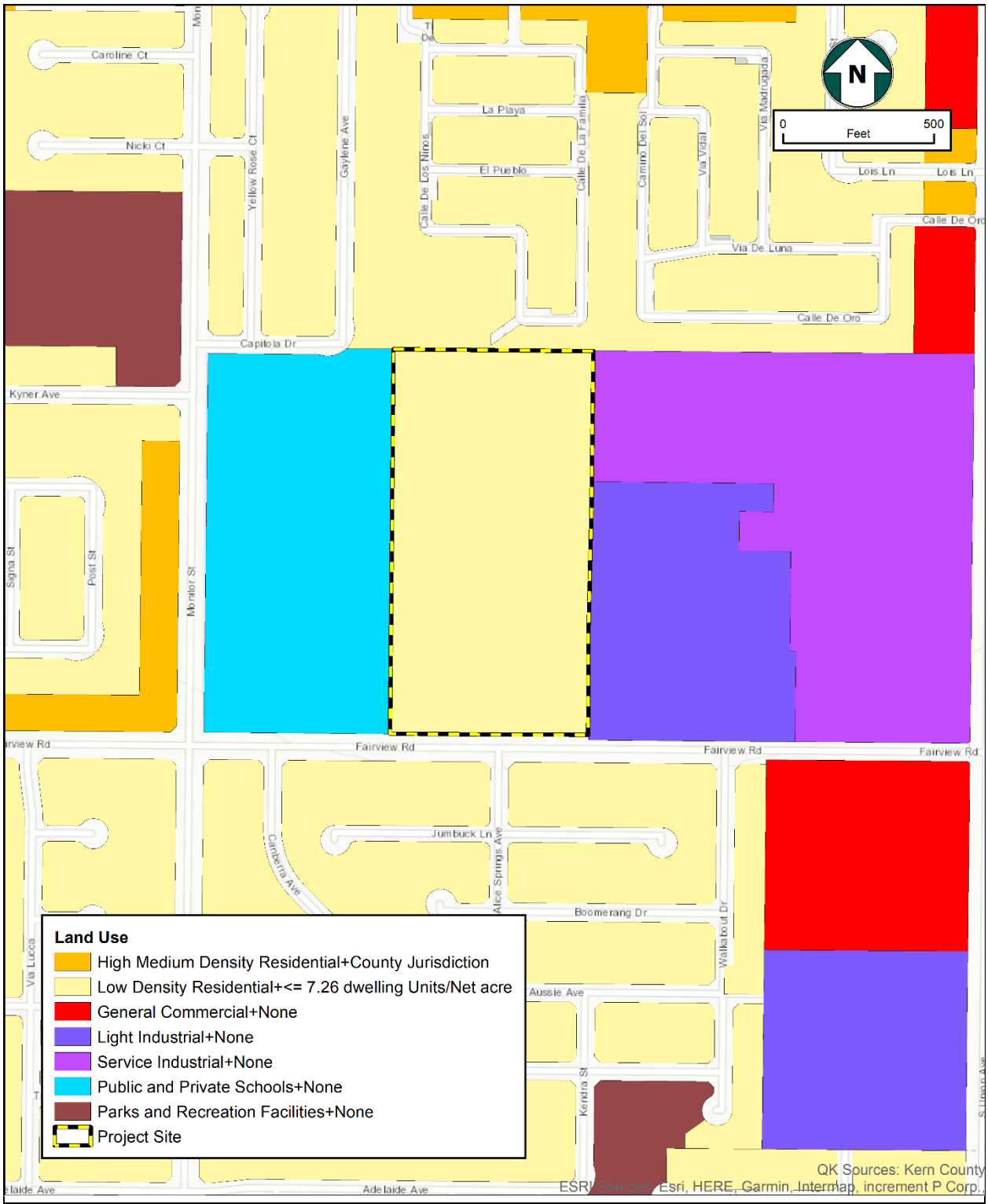

Figure 1-4
General Plan Land Use Designation

1.2.2 - PROJECT CHARACTERISTICS

This study is an Agricultural Conversion and Forest Resources Study prepared for the development of the Greenfield Union School District office (project) in City of Bakersfield, California. The project site is located in City of Bakersfield within the Metropolitan Bakersfield sphere of influence and is approximately 0.96 miles east of Kern County (Figure 1-1). The project consists of one site, with a project area totaling approximately 19.35 acres.

The project site is not subject to active Williamson Act Land Use contract. The City of Bakersfield land use designation and zone district of the project site and the vicinity are listed in Table 1-1 and illustrated in Figures 1-4 and 1-5.

The following actions may be requested as part of this project:

- General Plan Amendment to the Land Use Element;
- Change in Zone classification;

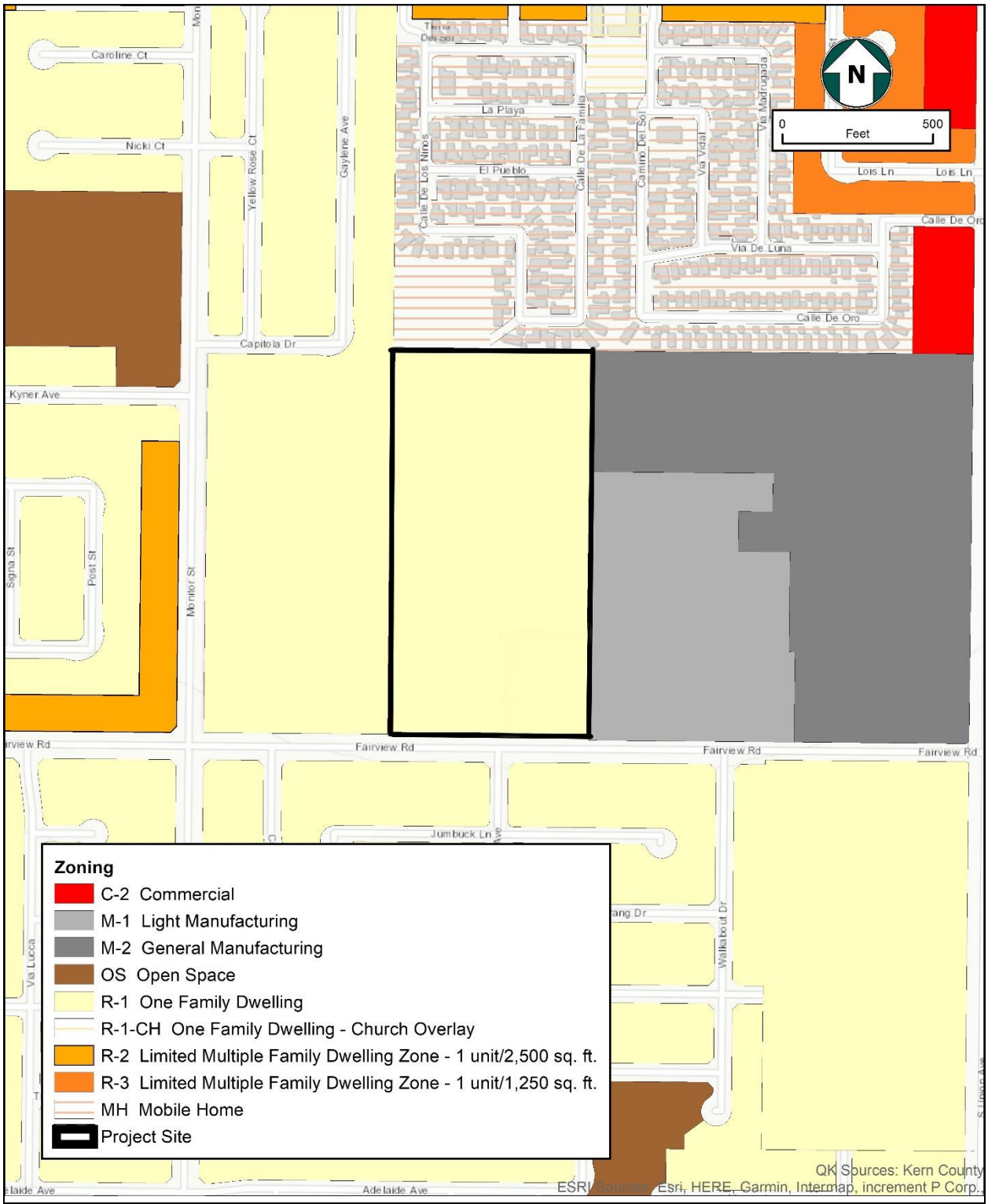

Figure 1-5
Zoning

SECTION 2 - REGULATORY SETTING

This section describes the regulatory setting related to agricultural resources in the project area.

2.1 - Federal

2.1.1 - FARMLAND PROTECTION POLICY ACT (7 USC 4201)

The purpose of the Farmland Protection Policy Act (FPPA) is to minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to non-agricultural uses. It additionally directs federal programs to be compatible with State and local policies for the protection of farmlands. Congress passed the Agriculture and Food Act of 1981 (Public Law 97–98) containing the FPPA—Subtitle I of Title XV, Sections 1539–1549. The final rules and regulations were published in the Federal Register on June 17, 1994.

The FPPA is administered by the United States Department of Agriculture and is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to non-agricultural 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. The FPPA does not authorize the federal government to regulate the use of private or non-federal land or, in any way, affect the property rights of owners.

For the purpose of FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, crop land, or other land, but not water or urban built-up land. The USDA provides mapping services and data online as the single authoritative source of soil survey information.

Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to non-agricultural use and are completed by a federal agency or with assistance from a federal agency (California Department of Conservation, 2011).

2.2 - State of California

2.2.1 - CALIFORNIA DEPARTMENT OF CONSERVATION, DIVISION OF LAND RESOURCE PROTECTION

The DOC applies the Natural Resources Conservation Service (NRCS) soil classifications to identify agricultural lands. Pursuant to the DOC's Farmland Mapping and Monitoring Program (FMMP), these designated agricultural lands are included in the Important Farmland Maps used in planning for the present and future of California's agricultural land

resources. The FMMP was established in 1982 to assess the location, quality, and quantity of agricultural lands and the conversion of these lands. The FMMP provides analysis of agricultural land use and land use changes throughout California. The DOC has a minimum mapping unit of 10 acres, with parcels that are smaller than 10 acres being absorbed into the surrounding classifications.

The list below provides a description of all the categories mapped by the DOC. Collectively, lands classified as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are referred to as Farmland (Department of Conservation, 2004).

Prime Farmland. Farmland that has 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. 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. 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. Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

Grazing Land. 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 Built-up Land. Land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six 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. 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 and non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

2.2.2 - CALIFORNIA LAND CONSERVATION (WILLIAMSON ACT)

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is promulgated in California Government Code Sections 51200–51297.4, and therefore is applicable only to specific land parcels within the State of California. The 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 uses in return for reduced property tax assessments. Private land within locally designated agricultural preserve areas is eligible for enrollment under Williamson Act contracts. However, an agricultural preserve must consist of no less than 100 acres. In order to meet this requirement, two or more parcels may be combined if they are contiguous, or if they are in common ownership.

The Williamson Act program is administered by the DOC, in conjunction with local governments, which administer the individual contract arrangements with landowners. The landowner commits the parcel to a 10-year period wherein no conversion out of agricultural use is permitted. Each year the contract automatically renews unless a notice of non-renewal or cancellation is filed. In return, the land is taxed at a rate based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. An application for immediate cancellation can also be requested by the landowner, provided that the proposed immediate cancellation application is consistent with the cancellation criteria stated in the California Land Conservation Act and those adopted by the affected county or city. Non-renewal or immediate cancellation does not change the zoning of the property. Participation in the Williamson Act program is dependent on county adoption and implementation of the program and is voluntary for landowners.

As defined by the Williamson Act, prime agricultural land includes: (1) Class I and II soils as classified by the NRCS; (2) land that qualifies for rating 80 through 100 in the Storie Index Rating by the University of California, Division of Agricultural Sciences; (3) land that supports livestock used for the production of food and fiber and with at least one animal unit per acre; (4) land planted with fruit or nut-bearing crops that yield not less than $200 per acre annually during commercial bearing periods; or (5) land that has returned from the production of unprocessed agricultural plant products and annual gross value of not less than $200 per acre for three of the previous five years (Government Code, Section 51201(c)(1)-(5)).

2.2.3 - FARMLAND SECURITY ZONE ACT

The Farmland Security Zone Act is similar to the Williamson Act and was passed by the California State Legislature in 1999 to ensure that long-term farmland preservation is part of public policy. Farmland Security Zone Act contracts are sometimes referred to as "Super Williamson Act Contracts." Under the provisions of this act, a landowner already under a Williamson Act contract can apply for Farmland Security Zone status by entering into a contract with the county. Farmland Security Zone classification automatically renews each year for an additional 20 years. In return for a further 35 percent reduction in the taxable

value of land and growing improvements (in addition to Williamson Act tax benefits), the owner of the property promises not to develop the property into non-agricultural uses.

2.2.4 - Public Resources Code Section 21060.1

The Public Resource Code Section 21060.1 defines agricultural land for the purposes of assessing environmental impacts pursuant to CEQA using the FMMP. The FMMP was established in 1982 to assess the location, quality, and quantity of agricultural lands and the conversion of these lands. The FMMP provides analysis of agricultural land use and land use changes throughout California.

2.3 - Local

The project site is within the Metropolitan Bakersfield General Plan (MBGP) land use designation. The site is also governed by the City of Bakersfield Municipal Code. These adopted plans identify the types of land uses permitted in agricultural and residential zones and define the development parameters within each land use category.

2.3.1 - Metropolitan Bakersfield General Plan

The MBGP is intended to give long range guidance and provide goals, policies, and development standards in order to ensure the future character of the Metropolitan Bakersfield planning area meets the objectives within the general plan. The MBGP does not include any goals, policies, and implementation for an agricultural conversion. For the benefit of this study, the Kern County General Plan (KCGP) was utilized, although the project site is located within the Bakersfield City limits and is not subject to the KCCP policies.

The KCGP states that agriculture is vital to the future of Kern County and sets the goals of protecting important agricultural lands for future use and preventing the conversion of prime agricultural lands to other uses (e.g., industrial or residential).

Chapter II. Open Space and Conservation Element

The policies, goals, and implementation measures in the KCGP for agricultural resources applicable to the project are provided below. The KCGP contains additional policies, goals, and implementation measures that are more general in nature and not specific to development such as the proposed project. Therefore, they are not listed below, but may be incorporated by reference.

1.9 Resource

Goals

Goal 1. To contain new development within an area large enough to meet generous projections of foreseeable need, but in locations which will not impair the

economic strength derived from the petroleum, agriculture, rangeland, or mineral resources, or diminish the other amenities which exist in the County.

Goal 2. Protect areas of important mineral, petroleum, and agricultural resource potential for future use.

Goal 5. Conserve prime agriculture lands from *premature conversion* (emphasis added).

Policies

Policy 1. Appropriate resource uses of all types will be encouraged as desirable and consistent interim uses in undeveloped portions of the County regardless of General Plan designation.

Policy 7. Areas designated for agricultural use, which include Class I and II and other enhanced agricultural soils with surface delivery water systems, should be protected from incompatible residential, commercial, and industrial subdivision and development activities.

Policy 12. Areas identified by the Natural Resources Conservation Service (NRCS) (formerly Soil Conservation Service) as having high range-site value should be conserved for Extensive Agriculture uses or as Resource Reserve, if located within a County water district.

Policy 21. The County shall encourage qualifying agricultural lands to participate in the Williamson Act program or Farmland Security Zone program.

Implementation Measures

Implementation Measure F. Prime agricultural lands, according to the Kern County Interim-Important Farmland 2000 map produced by the DOC, which have Class I or II soils and a *surface delivery water system* (emphasis added) shall be conserved through the use of agricultural zoning with minimum parcel size provisions.

Implementation Measure G. Property placed under the Williamson Act/Farmland Security Zone Contract must be in a Resource designation.

2.3.2 - CITY OF BAKERSFIELD MUNICIPAL CODE

The City of Bakersfield Municipal Code is to implement the goals and policies of the general plan of the city which serve to promote and protect the public health, safety, peace, morals, comfort, convenience, and general welfare, and for the accomplishment. This includes allowable uses, building setback requirements, and development standards. Pursuant to State law, the Municipal Code must be consistent with the MBGP. This zoning code applies to all property in the City of Bakersfield, except land owned by the United States or any of its agencies.

Zoning Districts

A description of the zoning district within the program area is provided below:

(R-1) ONE-FAMILY DWELLING ZONE

The project site is R-1 One-family Dwelling Zone. The purpose of the R-1 One-family Dwelling Zone is primarily for single-family dwellings and accessory buildings such as garages and swimming pools.

Permitted land uses within the R-1 zone are set forth in Section 17.10.020. Uses that are permitted with approval of a Conditional Use Permit is set forth in Section 17.10.025 of City of Bakersfield Municipal Code and only include rooming house.

SECTION 3 - ENVIRONMENTAL SETTING

3.1 - State of California

3.1.1 - STATE OF CALIFORNIA AGRICULTURAL PRODUCTION

In 2010, the State of California contained 25.4 million acres of land that were dedicated to farm and ranch use, with 81,700 farms in operation at the time. This number represents less than four percent of the nation's total farming operations. However, these farms account for approximately 12.3 percent of the national gross cash receipts from crops and 6.5 percent of the receipts from livestock and livestock products, representing $34.8 billion in revenue.

The California Department of Food and Agriculture reported in their 2012–2013 Resource Directory that the average farm size in California is 312 acres, compared to the United States' average of 420 acres. Approximately 400 crops are grown in the State, including seeds, flowers, and ornamentals. California's top 20 crop and livestock commodities were valued at more than $35.8 billion in 2011.

3.1.2 - STATE OF CALIFORNIA FARMLAND CONVERSION

According to the DOC's most recent Farmland Conversion Report (2015), irrigated farmland in California decreased by more than 91 square miles (58,587 acres) between 2010 and 2012. The highest-quality agricultural soils, known as Prime Farmland, comprised 81 percent of the decrease (47,455 acres). Urban land decreased by 29,342 acres; a 34 percent decrease compared to the 2010 update. This was the lowest urbanization rate since the late 1990's, reflecting the onset of the recent economic recession. Land was removed from irrigated categories—to uses aside from urban—at a rate 41 percent lower than compared with the prior update (252,473 acres in 2010, and 149,577 acres in 2012). Land idling and reversion to dry farming were responsible for the majority of this type of conversion. The southern San Joaquin Valley and counties in the Sacramento–San Joaquin Delta were most impacted by land idling. Three counties had 10,000 or more acres of this conversion type: Fresno, Kern, and Kings.

3.2 - Kern County

3.2.1 - KERN COUNTY AGRICULTURAL PRODUCTION

Agriculture in Kern County makes a significant contribution to the economy of the State. As shown in Table 3-1, Kern County has consistently maintained its position as one of the top five agricultural economies in the State since 2006. Kern County was most recently in 2012 the third-largest producer of agricultural products in California and continued to increase agricultural production as crop value increased from $7.2 billion in 2012 to $7.4 billion in 2018.

Table 3-1
Kern County Agricultural Economy (2017–2018)

Year	$ Value (Billions)
2017	7,254,168,000
2018	7,466,152,000

Source: (Kern County Department of Agriculture and Measurement Standards, 2018)

The 2018 Kern County Agricultural Crop Report indicated that the 2018 gross value of all agricultural commodities produced in Kern County is $7,466,152,000. This represents a three percent increase from the 2017 crop value. A detail by crop of the economic value of Kern County's crops which contributed to Kern County's economic outcomes is listed in Table 3-2.

Table 3-2
Kern County Crop Economic Value (2017–2018)

Category	2017	2018	Total Change
Fruit & Nut Crops	$4,802,164,000	$5,147,712,000	$345,548,000
Seed Crops	$14,932,000	$7,876,000	(-$7,056,000)
Field Crops & Rangeland	$303,075,000	$331,573,000	$28,498
Vegetable Crops	$916,636,000	$770,301,000	(-$146,335,000)
Nursery Crops	$113,705,000	$122,473,000	$8,768,000
Industrial & Wood Crops	$10,764,000	$14,925,000	$4,161,000
Livestock & Poultry	$332,978,000	$272,181,000	(-$60,827,000)
Livestock & Poultry Products	$666,421,000	$687,292,000	$20,871,000
Apiary products	$93,493,000	$111,819,000	$18,326,000
Total Economic Value	**$7,254,168,000**	**$7,466,152,000**	**$211,984,000**

According to the 2018 Agricultural Crop Report prepared by the Kern County Agricultural Commissioner's Office, the County produces more than 250 different crops, including more than 30 types of fruits and nuts, 40 types of vegetables, and 20 field crops, as well as lumber, nursery stock, livestock, poultry, and dairy products. A detail by crop of the harvested and rangeland acreage which contributed to Kern County's economic outcomes is listed in Table 3-3.

Table 3-3
Kern County Harvested Crops (2017–2018) in Acres

Category	2017	2018	Total Change
Fruit & Nut Crops	546,290	551,495	5,205
Seed Crops	1,200	795	(-405)
Field Crops & Rangeland	248,021	236,831	(-11,190)
Vegetable Crops	86,830	74,160	(-12,670)
Nursery Crops	2,230	2,532	302
Total Harvest Acreage	**798,657**	**865,813**	**67,156**

3.2.2 - KERN COUNTY FARMLAND CONVERSION

According to the DOC's *California Land Conservation (Williamson) Act 2015 Status Report*, from 2010 to 2012, 1,829 acres in Kern County were converted from Important Farmland as identified by the FMMP to urban uses. The conversion of agricultural land to urban uses is affected by other economic factors, such as the economic benefits property owners sometimes realize by converting their farmland to urban or other commercial or industrial uses.

Table 3-4 provides a summary of the amount and type of total acreage in Kern County between 2012 and 2018, using the classifications of agricultural land provided by the FMMP. See also Figure 3-3, below.

Table 3-4
Kern County Important Farmland Summary (2012–2018)

	Acres			
Classification	2012	2014	2016	2018
Prime Farmland	597,771	585,035	579,295	573,935
Farmland of Statewide Importance	212,867	209,563	209,484	208,323
Unique Farmland	89,694	90,107	91,323	91,768
Farmland of Local Importance	0	0	0	0
Important Farmland Total	**900,332**	**884,705**	**880,102**	**874,026**
Total County Area Inventoried	5,224,258	5,224,310	5,224,314	5,224,315

Source: California Department of Conservation, 2004–2010

3.3 - Project

The project site is not within an area that has historically been used for agricultural crop production and is not subject to William Act Land Use contracts (Figures 3-1 and 3-2). However, the project site is identified on the FMMP as containing Important Farmland (Figure 3-3). The project site is included under Agricultural Preserve No. 11 (Figure 3-3).

3.3.1 - AGRICULTURAL CROPS—PROJECT SITE

The 19.35-acre project site has not been used in agricultural production within the last four reportable years (2015–2018). The Kern County Department of Agriculture and Measurement Standards (KCDA) maintains records of the application of pesticides on agricultural lands. According to the KCDA, the use permits generally coincide with agricultural use and production.

Figure 3-2 shows the location of commodities grown based on information available from permits issued by the Kern County Agricultural Commissioner's Office that may share the project's water supply entitlements. For each individual year, Table 3-5 identifies the Site IDs within the permit area along with information regarding issued permits.

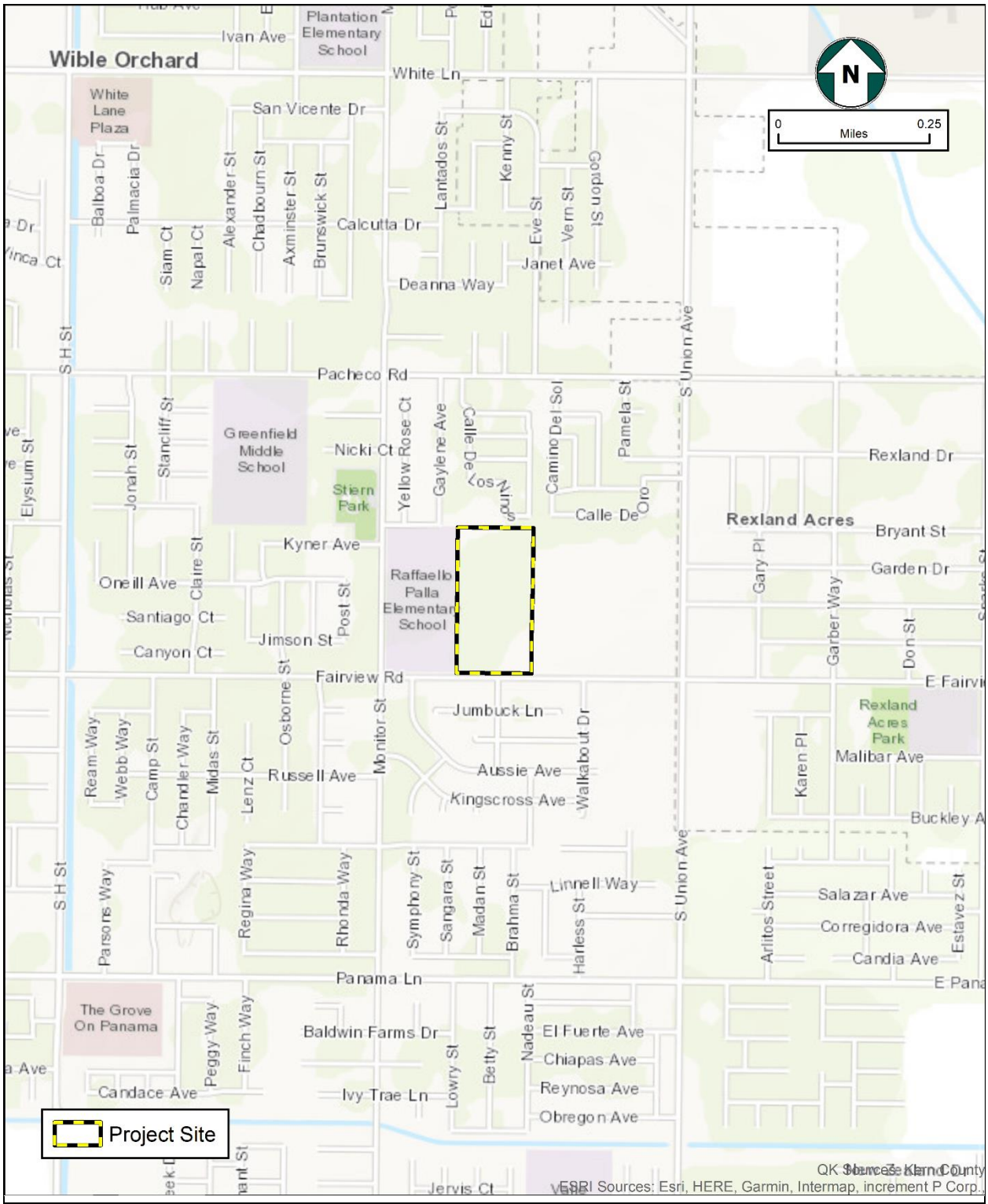

Figure 3-1
Williamson Act Contracted Lands

Figure 3-2
Crop Permit Issuance Information

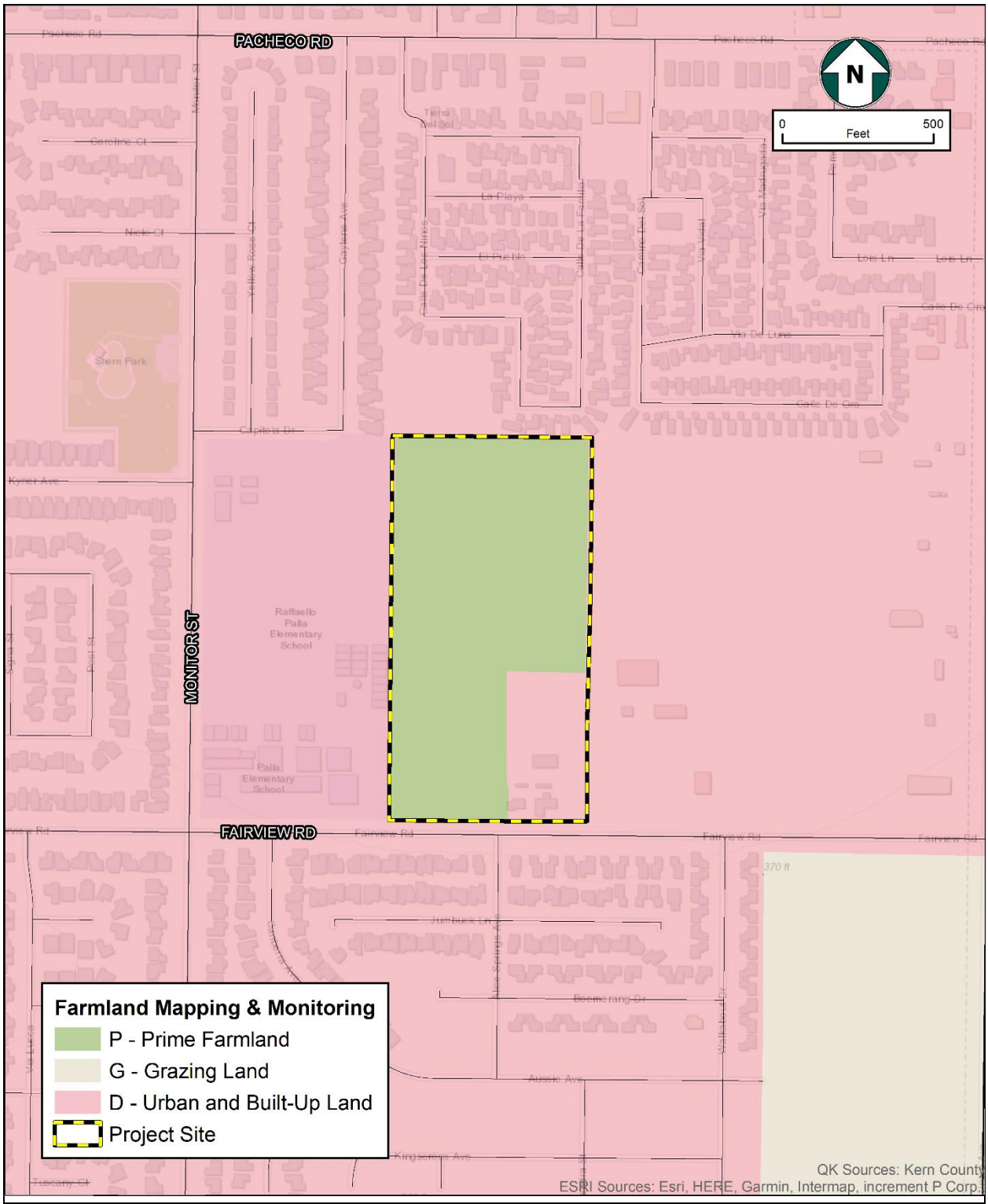

Figure 3-3
FMMP

Table 3-5
Summary of Use Permit History—Project Site (2015–2021)

Permit #	Year	Crop	Acres Planted
Zone Map 124			
N/A	2015	Cotton	19.35
N/A	2016	Cotton	19.35
N/A	2017	Cotton	19.35
N/A	2018	Cotton	19.35
N/A	2019	No Cultivation	19.35
N/A	2020	No Cultivation	19.35
N/A	2021	No Cultivation	19.35

Source: **(KCDA, 2019)**

The term "Prime" as it refers to a rating for agricultural/farmland use has two meanings in California. The Farmland Mapping and Monitoring Program determines the location and extent of "Prime Farmland". The parameters used are if the property has been used for irrigated agricultural production at some time during the four years prior to the Important Farmland Map data. In addition to land use, the soil must meet the physical and chemical criteria for Prime Farmland or Farmland of Statewide Importance as determined by the USDA Natural Resources Conservation Service (NRCS). NRCS soil factors include: water moisture regimes, available water capacity, and developed irrigation water supply, soil temperature range, acid-alkali balance, water table, soil sodium content, flooding (uncontrolled runoff from natural precipitation), erodibility, permeability rate, rock fragment content, and soil rooting depth.

In addition, a "Prime" designation as it relates to the Williamson Act has a slightly different legislative meaning based in State law as well as within the local policies and procedures. Farmland may be enrolled under the "Prime Agricultural Land" designation within the Kern County Williamson Act program if it meets certain size requirements, are part of a specific preserve area designated within the county, have appropriate zoning as well as meeting specific economic or production criteria.

3.3.2 - SOILS – PROJECT SITE

As shown in Figure 3-4, the project site contains one soil types the Kimberlina fine sandy loam. Kimberlina fine sandy loam soil type class with and without irrigation is denoted in Table 3-6.

(45) Kimberlina fine sandy loam: The Kimberlina series consists of very deep, well drained soils on flood plains and recent alluvial fans. These soils formed in mixed alluvium derived dominantly from igneous and/or sedimentary rock sources. Slope is zero to nine percent. The mean annual precipitation is about 6 inches, and the mean annual temperature is about 64°F.

Table 3-6
Project Site Soil Classes

Individual Project Site and Soil Type	Capability Class with Irrigation	Capability Class without Irrigation
29 Kimberlina find sandy loam, 0 to 2 percent slopes	1	7e
W Water	N/A	N/A

Source: (United States Department of Agriculture (USDA), 2021)

Figure 3-4
Soils Information Map

3.3.3 - WILLIAMSON ACT CONTRACTS—PROJECT SITE AND SURROUNDING AREA

As mentioned in Section 1.2, the project site is not under a William Act Contract; however, the project site under Agricultural Preserve No. 11.

There are twelve Tract Maps, a park, adjacent school, industrial and undeveloped residential land located inside of the Zone of Influence (ZOI) (Figure 3-5). A majority of the identified parcels within the ZOI are identified as single-family residences which surround the parcel on the north, south and west sides of the ZOI boundaries. On the east side of the ZOI is industrial development. The ZOI is defined as land near a given project, both directly adjoining and within a defined distance away, which is likely to influence, and be influenced by, the agricultural land use of the subject project site. The concept of ZOI and its significance will be discussed in further detail in the analysis portion of this study.

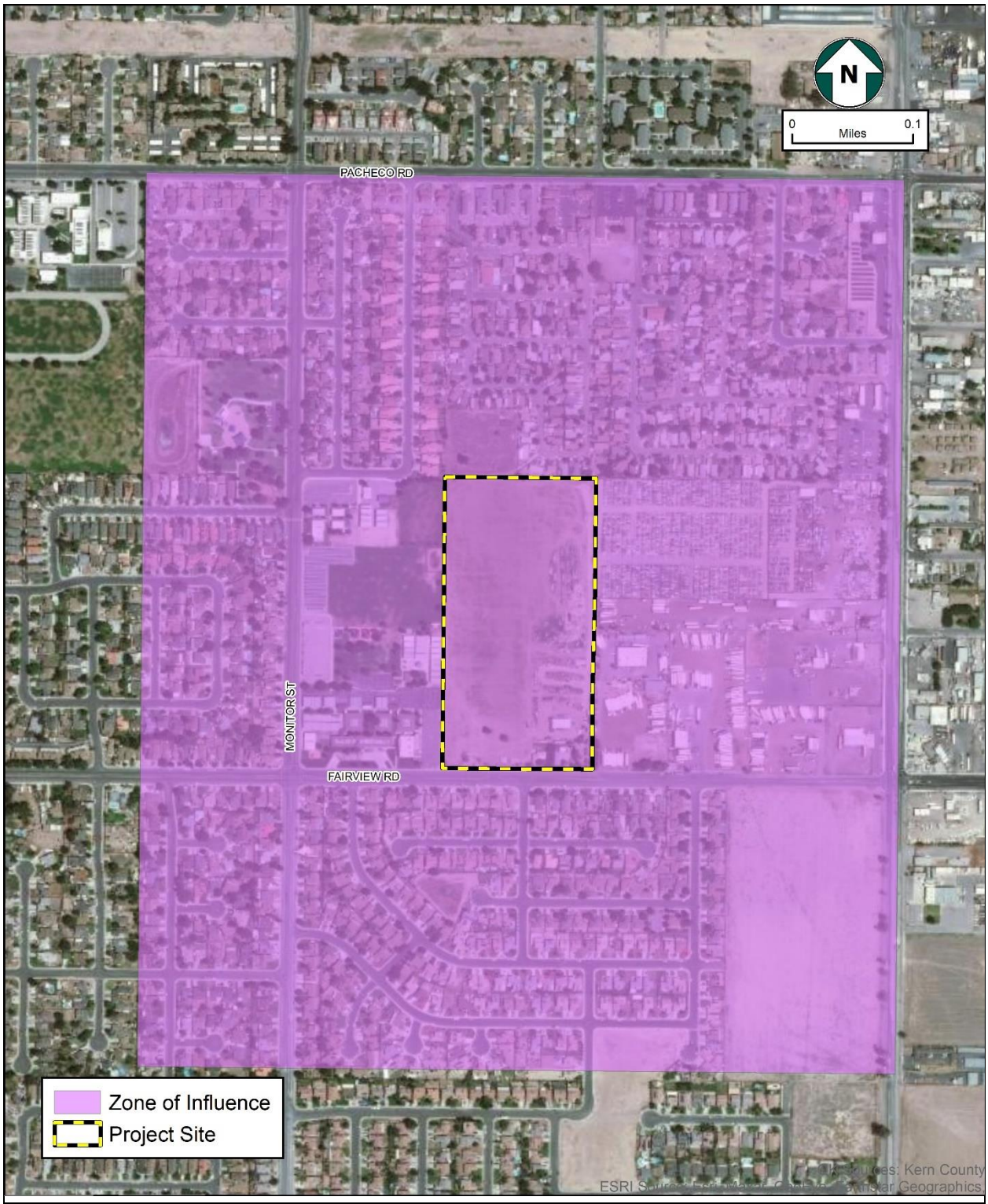

Figure 3-5
Zone of Influence Map

3.3.4 - WATER—PROJECT SITE

The project site had been using an existing water well for irrigation purposes only. At this time, there is no irrigation water rights from a local water district.

The project site is within the California Water Service area. When the project site is zoned for commercial development, the project will be required to obtain a will-serve letter indicating their capacity and ability to provide potable water.

3.3.5 - CLIMATE—PROJECT AREA

The project site is located in the southern Central Valley of California; this area has the rainy winters and dry summers characteristic of a Mediterranean climate. The Central Valley has greater temperature extremes than the coastal areas because it is less affected by the moderating influence of the Pacific Ocean.

The Western Regional Climate Center (WRCC) provides quality climate data derived from stationary weather stations throughout the western United States. WRCC has developed a data set for monthly climate for the Bakersfield area (1937 to 2010); this data set is based on weather readings taken from a stationary weather station found at the Meadows Field Airport north of Bakersfield. The monthly average maximum was 98.6°F in July and the monthly average minimum was 38.5°F in January.

Typical of southern California, most of the rainfall in the Bakersfield area occurs during the period between November and April because the Gulf Stream shifts southward from northern latitudes in the wintertime. This shift creates a quasi-permanent low-pressure zone over southern California and feeds moisture originating over the Pacific Ocean into the region. This southern shift creates the winter-wet or Mediterranean climate characteristic of Southern California. However, because of its inland location and the rain shadow effect (reduction of precipitation commonly found on the leeward side of a mountain caused by the coastal mountain ranges), the Bakersfield area typically gets less rainfall during the winter than coastal areas to the west. Average annual precipitation in the Bakersfield area is 6.21 inches.

SECTION 4 - FARMLAND CONVERSION IMPACT ANALYSIS

This section evaluates the impacts of farmland conversion with respect to the factors identified by Kern County and the California Agricultural Land Evaluation and Site Assessment Model (LESA).

4.1 - Methodology

This study follows the guidelines prescribed by Kern County in their *Guidelines for Agricultural Soils/Farmland Conversion Studies* and the California LESA Model to assess the proposed project's potential impacts to agricultural lands. The project site is not under a Williamson Act contract but is within Agricultural Preserve No. 11. Therefore, the proposed project will require an exclusion from the boundaries of Agricultural Preserve No. 11.

As noted above, this study will use the Kern County General Plan to analyze this project as the City of Bakersfield does not have any goals, policies or implementation for agricultural uses.

4.1.1 - APPLICABLE KERN COUNTY GENERAL PLAN POLICIES

Applicable Kern County General Plan Policies: Resource

Policy 7. Areas designated for agricultural use, which include Class I and II and other enhanced agricultural soils with surface delivery water systems, should be protected from incompatible residential, commercial, and industrial subdivision and development activities.

Williamson Act Contract Cancellations

The project is not under William Act Contract; therefore, no non-renewal and cancellation will be required to file. The project will not impede on agricultural production on nearby properties as there is no agricultural production in the surrounding area.

4.1.2 - LAND EVALUATION AND SITE ASSESSMENT (LESA)

The LESA Model provides guidelines for rating the relative quality of land resources based on specific measurable features. It 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). It is designed to assist in the making of determinations of the potential significance of a project's conversion of agricultural lands.

The California Agricultural LESA Model encompasses six different factors, which are divided into two sets: (1) two land evaluation factors (Land Capability Classification Rating and Storie Index Rating are based upon measures of the quality of soil resources and are intended to measure the inherent, soil-based qualities of land as they relate to agricultural suitability;

and (2) four site assessment factors (Project Size Rating, Water Resource Availability Rating, Surrounding Agricultural Lands Rating, and Surrounding Protected Resource Lands Rating) are intended to measure social, economic, and geographic attributes that also contribute to the overall value of agricultural land.

The two sets of factors are evenly weighted, meaning the two land evaluation factors and four site assessment factors are of equal importance. However, for a given project, each of these six factors is separately rated in a 100-point scale. The factors are then weighted relative to one another and combined, resulting in a single numeric score for a given project, with a maximum attainable score of 100 points. This final project score provides a quantitative measurement to assist decision-makers in making a determination of the level of significance of a project's potential impacts.

The California LESA Model includes two Land Evaluation factors, the Land Capability Classification Rating and the Storie Index Rating, discussed below, that are separately rated.

Land Evaluation (LE) Factors

The California LESA Model includes two Land Evaluation factors, discussed below, that are separately rated.

THE LAND CAPABILITY CLASSIFICATION RATING (LCC)

The Land Capability Classification System is used by the United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) to determine a soil's agricultural productivity. The LCC indicates the suitability of soils for most kinds of crops. Groupings are made according to the limitations of the soils when used to grow crops and the risk of damage to soils when used in agriculture. The soils are grouped according to their limitations for field crops, the risk of damage if they are used for crops and the way they respond to management. Soils are rated from Class I to Class VIII, with soils having the fewest limitations receiving the highest rating (Class I). The "prime" soil classification indicates the absence of soil limitations, which if present, would require the application of management techniques (e.g., drainage, leeching, special fertilizing practices) to enhance production. Specific subclasses are also utilized to further characterize soils. The soil type found on the project site is illustrated in Figure 3-4. A general description of soil classifications, as defined by NRCS, along with the scoring within the LESA Model of the LCC classification is provided below in Table 4-1 and Table 4-2, respectively.

Table 4-1
Land Capability Classifications

Soil Class	Description
I	Soils have few limitations that restrict their use.
II	Soils have moderate limitations that reduce the choice of plants, or that require special conservation practices.
III	Soils have severe limitations that reduce the choice of plants, require conservation practices, or both.
IV	Soils have very severe limitations that reduce the choice of plants, require very careful management, or both.
V	Soils are not likely to erode but have other limitations; impractical to remove soils that limit their use largely to pastures or range, woodland, or wildlife habitat.
VI	Soils have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture, or range, woodland, or wildlife habitat.
VII	Soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland or wildlife habitat.
VIII	Soils and landforms have limitations that preclude their use for commercial plant production and restrict their use to recreation, wildlife habitat, or water supply, or to aesthetic purposes.

Source: (USDA, 2021)

Table 4-2
Land Capability Classifications

Classification Symbol	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

The LESA model scores LLC utilizing a specified method based on proportion of the site within that classification. The percentage of the site within each LLC classification is multiplied by the corresponding score designation and then added together to give an overall score of the project. The LCC score of each soil type is shown in Table 4-3.

Table 4-3
Project Site – LLC Rating and Storie Rating Proportional Scores

Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
210	19.35	100%	I	100	100	86	86.0
Total Acres	**19.35**	**1**		**LCC Total**	**100**	**Storie Total**	**86.0**

Based on the weighted percentage of the total project acreage, the comprehensive LCC Rating of the project is 100.

THE STORIE INDEX RATING

The Storie Index provides a numeric rating (based upon a zero to 100 scale) of the relative degree of suitability or value of a given soil for intensive agriculture. The rating is based upon soil characteristics only. Four factors that represent the inherent characteristics and qualities of the soil are considered in the Storie Index rating: profile characteristics, texture of the surface layer, slope, and other factors such as drainage or salinity. In some situations, only the United States Department of Agriculture's LCC information may be available. In situations where other information is available, the Storie Index ratings can be calculated from information contained in soil surveys conducted by qualified soil scientists; however, if limitations of time and/or resources restrict the derivation of the Storie Index rating using these methods, the Storie Index Rating may be obtained by relying solely upon the LCC rating. In addition, the USDA, Natural Resources Conservation Services provides a useful online mapping tool that provides soil information and data which includes the Storie Index rating for approximately 95 percent of all U.S. sites. 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. 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), 30 to 20; Grade 5 (very poor), 19 to 10; and Grade 6 (non-agricultural), less than 10. The project's soil type was previously described in Section 3.3 of this study. Table 4-3 shows the proportional breakdown and comprehensive score of the project site as it relates to overall Storie Rating.

Based on the weighted percentage of the total project acreage, the comprehensive Storie Rating of the project is 86.0.

Site Assessment (SA) Factors

The four site assessment factors that are separately rated and included in the California LESA Model are discussed below.

THE PROJECT SIZE RATING

The Project Size rating is based upon identifying acreage totals for the soil classes derived from the Storie Index within the project site, and then determining what grouping generates the highest Project Size score and what percentage of each group of the total project site. The Project Size rating relies upon acreage figures that were tabulated under the Land Capability Classification rating. The total project consists of Class I, Class II, and Class III soils. The scoring of the Project Size is shown in Table 4-4.

Table 4-4
Project Size Scoring

Class I and II		Class III		Class IV or lower	
Acres	Score	Acres	Score	Acres	Score
>80	100	>160	100	>320	100
60-79	90	120-159	90	240-319	80
40-59	80	80-119	80	160-239	60
20-39	50	60-79	70	100-159	40
10-19	30	40-59	60	40-99	20
10<	0	20-39	30	40<	0
		10-19	10		
		10<	0		

Based on the fact that Class I soils comprise the 19.35 acres site, the Project Size Score of the project is 30.

THE WATER RESOURCES AVAILABILITY RATING

The Water Resources Availability rating is based upon identifying the various water sources that may supply a given property, and then determining whether different restrictions in supply are likely to take place in years that are characterized as being periods of drought and non-drought. Consideration is also given to both the physical and economic factors that may restrict water availability. Please see Table 4-5 for a representation of the LESA Water Availability Scoring system.

During non-drought years, irrigated production of all the project sites is feasible without any economic or physical restrictions due to the surface water availability as well as the use of on-site wells, if necessary. During drought years, irrigated production may be limited only due to economic limitations due to limited surface water supplies but this may be offset by increasing private groundwater usage from existing wells operated by the applicable water district in order to supply adequate water services. It is assumed that there is water available to irrigate crops as needed, based on the available data and history of ongoing cultivation on the project parcels, as noted on Table 3-5. Therefore, it is assumed properties have sufficient water during drought and non-drought years and there are no limitations or restrictions.

Therefore, based on this information, the project's Water Resource Availability rating is 100.

Table 4-5
LESA Water Availability Scoring System

Option	Non-Drought Years Restrictions			Drought Years Restrictions			Water Resource Score
	Irrigated Production Feasible?	Physical Restrictions?	Economics Restrictions?	Irrigated Production Feasible?	Physical Restrictions?	Economics Restrictions?	
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
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

THE SURROUNDING AGRICULTURAL LAND RATING

Determination of the Surrounding Agricultural Land rating is based upon identification of a project's ZOI, which is defined as that land near a given project, both directly adjoining and within a defined distance, that is likely to influence, and be influenced by, the agricultural land use of the subject project site. The Surrounding Agricultural Land rating is designed to provide a measurement of the level of agricultural land use for lands close to a given project. The California Agricultural LESA Model rates the potential significance of the conversion of an agricultural parcel that has a large proportion of surrounding land in agricultural production more highly than one that has a relatively small percentage of surrounding land in agricultural production.

The defined distance of the ZOI recommended in the LESA model (a minimum of 0.25 miles from the project boundary from the smallest rectangular area that completely encompasses the project site) is the result of several iterations during model development for assessing an area that will generally be a representative sample of surrounding land use. Figure 3-6 shows the ZOI surrounding the entire project site and the corresponding agricultural usage as documented by Kern County Department of Agriculture (KCDA). Each zone map site's ZOI was incorporated with one another in order to provide a comprehensive overview of the

total project. The total area of the ZOI is approximately 297.98 acres and will be used for calculating the Surrounding Agricultural Land Ratings, as shown in Table 4-6.

Table 4-6
Surrounding Agricultural Land Rating Scoring

Percent of ZOI in Agriculture	Score
90-100%	100
80-89%	90
75-79%	80
70-74%	70
65-69%	60
60-64%	50
55-59%	40
50-54%	30
45-50%	20
40-44%	10
< 40%	0

According to data available from Kern County, there are approximately zero acres of land within the ZOI which is classified as agricultural. Therefore, based on the surrounding agricultural activities and uses, the project sites' Surrounding Agricultural Land ratings are zero.

THE SURROUNDING PROTECTED RESOURCE LAND RATING

The Surrounding Protected Resource Land rating is essentially an extension of the Surrounding Agricultural Land rating, and it is scored in a similar manner. Protected resource lands are those lands with long-term use restrictions that are compatible with or supportive of agricultural uses of land. Included among them are the following:

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

The total area of the ZOI is approximately 297.98 acres and will be used for calculating the Surrounding Agricultural Land Ratings, as shown in Table 4-7.

Table 4-7
Surrounding Protected Resource Land Rating Scoring

Percent of ZOI in Protected	Score
90-100%	100
80-89%	90

75-79%	80
70-74%	70
65-69%	60
60-64%	50
55-59%	40
50-54%	30
45-50%	20
40-44%	10
< 40%	0

According to the Kern County online mapping system, there is no land with active Williamson Act contract within the ZOI. However, there is a maintained public park within the ZOI. There, based on the aforementioned parameters, the surrounding protected resource land rating is zero.

Final LESA Determination

A single LESA score is generated for a given project after a comprehensive review of all parcels within the project site have been scored and weighted. The California Agricultural LESA Model is weighted so that 50 percent of the total LESA score of a given project is derived from the Land Evaluation factors and 50 percent is derived from the Site Assessment factors. Individual factor weights are listed below, with the sum of the factor weights required to equal 100 percent. Table 4-8 lists the factors and percentages used in LESA Scoring.

Table 4-8
LESA Factors and Weighted Percentages

LESA Factors	Percentages
Land Evaluation Factors	
Land Capability Classification (LCC)	100.0
Storie Index Rating	86.0
Land Evaluation (LE) Subtotal	**46.5**
Site Assessment Factors	
Project Size Rating	19.4
Water Resource Availability	100.0
Surrounding Agricultural Lands	0.0
Surrounding Protected Resource Lands Rating	0.0
Site Assessment (SA) Subtotal	**119.4**
Total LESA Factor Weighting	**64.4**

Notes: LESA scoring sheet provided in Appendix A.

The overall project's total LESA Score is 64.4, which is a comprehensive score for the project.

Table 4-9 articulates the California LESA Model Scoring Thresholds for determining the significance of a project's impacts.

Table 4-9
California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39	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 subscore is less than 20 points
80 to 100 Points	Considered Significant

This determination is based on the results of the California Agricultural LESA prepared for the project (Appendix A). The LESA model concludes that the project has a total score of 64.4 points, which falls within the "Considered Significant unless either LE or SA subscore is less than 20 points" category. Based on the standard LESA model scoring thresholds, a significant environmental impact would result from the conversion to non-agricultural uses of any site as the LE (Land Evaluation) and SA (Site Assessment) subscore is not less than 20 points. Based on this threshold, the conversion of the project site to non-agricultural uses results in a significant impact.

SECTION 5 - IMPACT ANALYSIS

CEQA Guidelines Appendix G, indicate that a project would have a significant impact on agriculture and forestry resources if it would:

A. 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 nonagricultural use;
B. Conflict with existing zoning for agricultural use or Williamson Act Contract;
C. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined in Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
D. Result in the loss of forestland or conversion of forest land to non-forest use.
E. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use; or
F. Result in the cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 or Farmland Security Zone Contract for any parcel of 100 acres or more (Public Resources Code Section 15206(b)(3)).

5.1 - Convert Important Farmland

5.1.1 - IMPACT ANALYSIS

Implementation of the proposed project would result in the construction of an approximately 19.35-acre commercial development to developed Greenfield Union School District offices. The facility would convert 19.35-acre Prime Farmland, as shown on Figure 3-3. Note Important Farmland designations are from the DOC FMMP data, which is not the same as the Williamson Act Prime farmland designation. Under CEQA, FMMP Prime Farmland, Unique Farmland and Farmland of Statewide Importance are referred to as Farmland and are considered a protected agricultural resource.

The conversion of 19.35-acres of Farmland to non-agricultural use has the potential to result in two types of impacts—direct conversion impacts, which is the conversion of land within the project site boundary, as well as indirect impacts, which is the pressure to convert other properties adjacent to the project site from agricultural to non-agricultural use.

The conversion of the project site from agricultural use to commercial use is not expected to create growth-inducing impacts to other nearby farmlands as there are no farmlands within the surrounding area. Adjacent properties are already impacted by existing urban development. Existing uses surrounding the proposed project area demonstrate that the proposed project will not induce further growth as the project site is the only parcel to be undeveloped.

If a project were to convert any amount of acreage from Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, then that project could exhibit a significant impact under the CEQA Guidelines Appendix G. The project would result in the direct conversion of 19.35 acres of Important Farmland. The project site has not been continuously farmed throughout the past four years and represents Class I soil which is amongst the higher quality soils for farmland, if irrigation was possible; the project site is currently not irrigated.

The LESA Model (see Section 4.1.2) analysis indicated a overall score of 64.4, which can be considered significant. The landowner cannot continue to use the existing water well for irrigation purposes and has no water rights by the water purveyor under the pertinent Groundwater Sustainability Plan as the project site is not being served by a water purveyor.

Additionally, within a Countywide context, the lost acreage represents a minimal percentage (0.0019%) of the total 874,026 acres of Important Farmland within Kern County. The project site is located within the Bakersfield City limits and surrounded on all four sides by urban development. Given these facts and the natural growth of the City; it is responsible to assume that the site will be developed with non-agricultural uses. The following section discusses the impacts of the project, as they relate to farmland conversion, with the CEQA Guidelines and checklist.

5.2 - Conflict with Existing Zoning for Agricultural Use or a Williamson Act Contract

5.2.1 - IMPACT ASSESSMENT

This impact evaluates the potential for the proposed project to conflict with existing agricultural zoning or Williamson Act contracts.

Agricultural Zoning

The project site is not zoned agricultural nor in a Williamson Act contract, therefore the impact of conversion of agricultural land would have no impacts.

Williamson Act Contract

The project site is not under Williamson Act Contract. The closest land under contract is approximately 3.3 miles to the southeast of the project site and within Kern County jurisdiction. Therefore, there are no impacts to a Williamson Act contract under the proposed project.

MITIGATION MEASURES

No mitigation is required.

Level of Significance

No Impact.

5.3 - Forest Land

5.3.1 - IMPACT ASSESSMENT

This impact evaluates the potential for the proposed project to conflict with existing forest land zoning or result in the loss of forest land or result in the conversion of forest land to non-forest use.

The project is currently zoned for residential use. There is no forest land zoning on the project site and there are no forest uses on the project site. The project would not conflict with zoning for, or cause rezoning of, forest land, timberland, or timberland zoned timberland production. Additionally, it would not result in the loss of forest land or conversion of forest land to non-forest land. Lastly, the project would not involve any other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. Therefore, no impacts would occur.

Level of Significance

No Impact.

MITIGATION MEASURES

No mitigation is required.

5.4 - Pressures to Convert Farmland to Non-Agricultural Use

5.4.1 - IMPACT ASSESSMENT

This impact evaluates the potential for the proposed project to create pressure to convert farmland to non-agricultural use. Based on the assessment provided in this study, the project would not induce the conversion of other nearby agricultural lands to non-agricultural uses for the following reasons:

- Some of the project site is currently in agricultural production and have been used continuously for agricultural production for the most recent four years, The site is has not been in agricultural production since 2019 as evidenced by the permit records of the Kern County Agricultural Commissioner's Office. However, the removal of the project site from agricultural production is not anticipated to affect nearby growers' ability to farm and would not require additional restrictions and limitations on pesticides, fungicides, and herbicides used on the crops as the project does not include the addition of any sensitive receptors to the adjacent agriculture lands.
- The removal of this property from agricultural use would not substantially affect the agricultural character of the area. As mentioned in Section 4.1.2, the water availability rating only pertains to the parcels identified within the project site. The discussion of surrounding properties and how they have managed rotational crop use is not measured in the Water Availability Scoring System since it does not have any bearing on water use onsite.
- The proposed project would ensure that more water resources are readily available in the surrounding areas by no longer using on-site groundwater wells or surface water for irrigation purposes.
- In addition, the project is sited along major roadways and surrounded by urban uses. The proposed use would not substantially affect the agricultural character or production of the area.

Accordingly, impacts associated with conversion of agricultural lands to non- agricultural uses would be less than significant.

Level of Significance

Impacts are *Less than Significant*.

MITIGATION MEASURES

No mitigation is required.

5.5 - Cancellation of Open Space Contract

5.5.1 - IMPACT ASSESSMENT

Kern County's adopted threshold analyzes whether the project would result in the cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 or Farmland Security Zone Contract for any parcel of 100 or more acres (Section 15206(b)(3) Public Resources Code.

Implementation of the proposed project would result in the construction of Greenfield Union School District offices. As noted in Section 5.2.1, the project site is not subject to a Williamson Act Contract.

Implementation of the proposed project has no impact related to a Williamson Act Contract, since the project site is not under contract. The closest parcel under contract is approximately 3.3 mile to the southeast of the project site. Therefore, implementation of the proposed project would have no impact.

MITIGATION MEASURES

No mitigation is required.

Level of Significance After Mitigation

No *Impact.*

5.6 - Cumulative Impacts

5.6.1 - IMPACT ASSESSMENT

The geographic scope for cumulative impacts is Kern County as a whole. As discussed previously, Kern County ranks high on the list of California counties with respect to urbanization and loss of farmland. Although, growth in population is likely to decrease the amount of agricultural land in Kern County in the future, other factors, including availability of water also contribute to decreases in farmland.

As noted, the project site has a water well for irrigation purposes only and does not have a sufficient water source. Due to this and given the fact the surrounding area is within an urbanized area the conversion of approximately 19.35 acres of Prime farmland to non-agricultural use, combined with other area projects, would have no impact.

MITIGATION MEASURES

No mitigation is required.

Level of Significance

No *impact.*

SECTION 6 - SUMMARY OF FINDINGS

This report evaluated the permanent removal of a 19.35-acre project site from non-agricultural production using the LESA Model, Kern County's guidelines for the conversion of agricultural resources, and the CEQA guidelines. Based on the analysis contained in this report and supporting evidence, this report finds that the project:

- Would not result in the removal of a potentially significant amount of Important Farmland from agricultural production based on a qualitative analysis;
- Would not conflict with existing agricultural uses in the project's vicinity;
- Would be considered to result in a significant impact based on a quantitative assessment using the LESA model;
- Would not result in a significant and unavoidable impact to agricultural resources under CEQA; and
- Would not result in a cumulatively significant and unavoidable project-level impact to agricultural resources under CEQA.

For these reasons, the project's impacts related to the conversion of agricultural uses to non-agricultural uses are considered to t be less than significant pursuant to CEQA.

SECTION 7 - REFERENCES

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