



# TECHNICAL MEMORANDUM

**TO:** Trammel Crow So. Cal. Development, Inc.

**FROM:** Christhi Mrosia, T&B Planning

**DATE:** October 20, 2022

**RE:** Dowling Ranch, Beaumont – LESA Analysis

## **I. PROJECT UNDERSTANDING**

Trammel Crow So. Cal. Development, Inc. (hereafter “Client”) is considering development of an approximately 30.9-gross-acre property located south of Highway 60 and west of the Highway 60 and Interstate 10 (I-10) interchange in the City of Beaumont, Riverside County (Assessor Parcel Number [APN]: 417-020-070) (refer to Figure 1, *Aerial Photograph*). The property is associated with the address 38021 Highway 60, Beaumont, California. Client desires to pursue entitlements for an industrial cross-dock warehouse distribution building of approximately 600,000 square feet (s.f.) (the “Project”). The preliminary site plan orients the building north and south with loading docks and trailer parking along the east and west sides of the proposed building. The purpose of this memorandum is to determine whether the Project will have a significant effect on agricultural resources under the California Environmental Quality Act (“CEQA”).

### **A. Existing Use**

Under existing conditions<sup>1</sup>, the property is operating as a fruit orchard (Dowling Fruit Orchard). It should be noted that the family that formerly operated the fruit orchard closed their business due to loss of business related to freeway construction limiting access to the fruit stand operation and agricultural operations are no longer viable. The western portion of the property is developed with structures associated with the orchard (fruit stand and support structures) and one legal non-conforming single-family residence with ancillary structures. The eastern portion of the property is an active orchard and disturbed plowed fallow land.

### **B. Existing General Plan Designation and Zoning Classification**

The City’s General Plan designation for the property is Industrial (I) and allows for a maximum intensity floor area ratio (FAR) ranging between 0.25 and 0.75<sup>2</sup>. The Industrial designation provides for a range of industrial uses, including “standalone” industrial activities, general and light industrial, research parks, private trade schools, colleges, and business parks.

<sup>1</sup> As of November 2021, the property is not operating as a fruit orchard.

<sup>2</sup> [https://www.beaumontca.gov/DocumentCenter/View/36923/Beaumont-GPU\\_Final-rev-22521](https://www.beaumontca.gov/DocumentCenter/View/36923/Beaumont-GPU_Final-rev-22521)



Source(s): ESRI, RCTLMA (2021), Nearmap Imagery (2022)

Figure 1

The City's zoning classification for the property is Manufacturing (M). The primary purpose of the M zone district is "to maintain the existing industrial and manufacturing uses and to promote the development of new business parks, light industrial use, research parks, manufacturing uses, warehousing activities, and ancillary and supportive uses."<sup>3</sup> It should be noted that produce stands, such as the fruit stand at the existing orchard, are permitted within the M zone.

## **II. AGRICULTURE IN CALIFORNIA**

### **A. Williamson Act**

In 1965, the California Assembly established the California Land Conservation Act, also known as the Williamson Act, in response to the increasing pressure occurring throughout California during the post-World War II period to convert agricultural lands to urban development. The Williamson Act allows local governments to enter into contracts with landowners to restrict property to agricultural or related open space uses for a minimum of 10 years in exchange for a lower property tax assessment to the landowner. After the initial 10-year contract term, the contract remains in effect until canceled by the landowner or the local government. Once canceled, a contract winds down over a period of 10 years. According to the Beaumont General Plan 2040 Draft Program Environmental Impact Report (PEIR)<sup>4</sup>, there are no lands with active Williamson Act contracts within the City.

### **B. Farmland Classification**

As part of the State's efforts to protect agricultural resources, the Farmland Mapping and Monitoring Program (FMMP) was established in 1982, to provide data to public, academia, and government entities for the purposes of making informed decisions regarding the use of California's agricultural land resources. To identify the agricultural importance of different farmland types, the FMMP created five main categories based on soil quality and irrigation status<sup>5</sup>. The five categories are listed below.

- **Prime Farmland**: "Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. 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 less quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated. 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 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."

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<sup>3</sup> [https://library.municode.com/ca/beaumont/codes/code\\_of\\_ordinances?nodeId=TIT17ZO\\_CH17.03ZOMAZODI\\_17.03.100MAZOMZO](https://library.municode.com/ca/beaumont/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.03ZOMAZODI_17.03.100MAZOMZO)

<sup>4</sup> <https://www.beaumontca.gov/DocumentCenter/View/36627/DEIR-090720>

<sup>5</sup> <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx>

According to the California Department of Conservation (CDC) Important Farmland Finder Map (see Figure 2, *FMMP Map*), the property's eastern portion consists of 10.2 acres of "Prime Farmland" and 14.7 acres of "Unique Farmland". The western portion of the property consists of 5.1 acres of "Urban and Built-Up Land," which is land that is "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."<sup>6</sup>

### **III. METHODOLOGY**

#### **A. LESA Model**

The LESA Model is a point-based approach that uses measurable factors to quantify the relative value of agricultural land resources to ultimately determine the significance of agricultural land conversions. Many states have developed LESA Models specific to their local contexts. The California LESA Model was created as a result of Senate Bill 850 (Chapter 812/1993), and provides lead agencies with an optional methodology to ensure that potentially significant effects on the environment associated with agricultural land conversions are quantitatively and consistently considered in the environmental review process, including in CEQA reviews.<sup>7</sup> CEQA Guidelines Section 21061.2, *Land Evaluation and Site Assessment*, defines LESA as a decision-making methodology for assessing the potential environmental impact of State and local projects on agricultural land. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California LESA Model. The California LESA Model is the methodology used by the City of Beaumont to determine whether or not important agricultural resources are present on a property.

#### **B. California LESA Model Scoring System**

The California LESA Model is made up of two sets of factors, referred to as the "Land Evaluation" (LE) and "Site Assessment" (SA) factors, which are scored and weighted separately to yield a total LE subscore and SA subscore. The Final LESA Score is the sum of the LE and SA subscores and has a maximum possible score of 100 points. Based on the Final LESA Score, a threshold system (refer to Table 1, *California LESA Model Scoring Thresholds*) is used to determine the significance of a project's impacts on agricultural resources.<sup>6</sup>

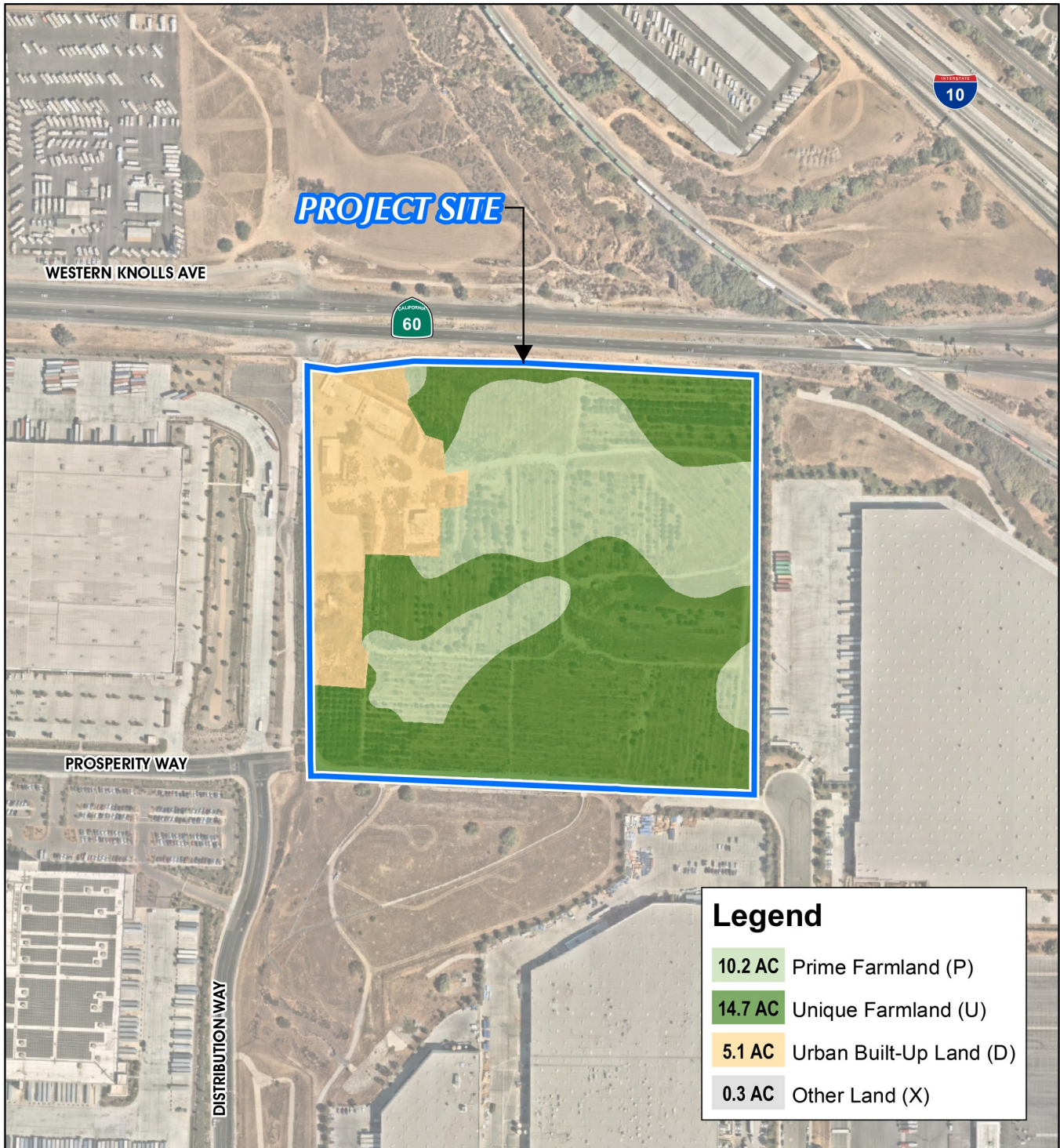
**Table 1 California LESA Model Scoring Thresholds**

| <b>Total LESA Score</b> | <b>Scoring Decision</b>                                                                                      |
|-------------------------|--------------------------------------------------------------------------------------------------------------|
| 0 to 39                 | Not Considered Significant                                                                                   |
| <b>40 to 59</b>         | <b>Considered Significant <u>only if LE and SA subscores are each greater than or equal to 20 points</u></b> |
| 60 to 79                | Considered Significant <u>unless</u> either LE <u>or</u> SA subscore is <u>less</u> than 20 points           |
| 80 to 100               | Considered Significant                                                                                       |

Source: (CDC, 1997, Table 9)

<sup>6</sup> <https://maps.conservation.ca.gov/DLRP/CIFF/>

<sup>7</sup> (CDC, 1997) California Department of Conservation, 1997. *California Agricultural Land Evaluation and Site Assessment Model Instruction Manual*.



Source(s): ESRI, RCTLMA (2021), Nearmap Imagery (2022)

Figure 2

## C. Land Evaluation (LE)

The LE subscore consists of two (2) factors, including the Land Capability Classification (LCC) rating and the Storie Index rating, which were devised to measure the inherent soil-based qualities of land as they relate to agricultural production. The LCC Rating and Storie Index rating scores are based upon the soil map unit(s) identified on a property and the acreage of each soil mapping unit relative to the property's total acreage. Data for the soil map unit(s), LCC, and Storie Index are obtained from soil survey data provided by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS)<sup>6</sup>.

### 1) **Land Capability Classification (LCC) Rating**

There are eight (8) classes of LCC (I through VIII). Soils designated "I" have the fewest limitations for agricultural production and soils designated "VIII" are least suitable for farmland. The LCC is further divided into subclasses (designated by lowercase letters e, w, s, or c) to describe limitations, including a soil's susceptibility to erosion ("e"), limitations due to water in or on the soil ("w"), shallow or stony soils ("s"), or climate ("c").<sup>8</sup>

The LCC classification is converted into a numeric score established by the California LESA Model. Table 2, *Numeric Conversion of Land Capability Classification Units*, summarizes the LCC numeric conversion scores used by the LESA model. The LCC Score used in the LESA Model is determined by multiplying the LCC Rating for each map unit identified on a property by the corresponding map unit's proportion of the property's total acreage. The individual LCC Score(s) for each map unit are summed together for a total, single LCC Score for the property. The LCC Score accounts for 25% (0.25) of the total California LESA Model Score.<sup>6</sup>

**Table 2 Numeric Conversion of Land Capability Classification Units**

| LCC    | I   | Ile | Ils, w | IIle | IIls, w | IVe | IVs, w | V  | VI | VII | VIII |
|--------|-----|-----|--------|------|---------|-----|--------|----|----|-----|------|
| Rating | 100 | 90  | 80     | 70   | 60      | 50  | 40     | 30 | 20 | 10  | 0    |

Source: (CDC, 1997, Table 2)<sup>6</sup>

### 2) **Storie Index Rating**

The Storie Index is a quantitative method of rating the agricultural capability of soils. The Storie Index has been used in California for over 50 years, with the most recent version of the Storie Index being published in 1978. The Storie Index is based on four (4) factors: 1) degree of soil profile development; 2) surface texture; 3) slope; 4) other soil and landscape conditions including drainage, alkalinity, nutrient level, acidity, erosion, and microrelief. Soils are graded on a 100-point scale that represents the relative value of a given soil when used for intensive agricultural purposes.<sup>9</sup>

The Storie Index Score is calculated for each soil map unit identified on a property by multiplying the Storie Index rating by the map unit's proportion of the property's total acreage. The individual Storie Index Score(s) for each map unit are added together to provide a single Storie Index Score for the property. The Storie Index Score accounts for 25% (0.25) of the total California LESA Model Score<sup>6</sup>.

<sup>8</sup> (USDA) <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>

<sup>9</sup> University of California, Division of Agricultural Sciences, 1978. *Storie Index Soil Rating, Special Publication 3203*.

## **D. Site Assessment (SA)**

The SA subscore consists of four (4) factors that measure social, economic, and geographic features that contribute to the overall value of agricultural land. The SA factors include Project Size Rating, Water Resource Availability Rating, Surrounding Agricultural Land Rating, and Protected Resource Land Rating.<sup>6</sup>

### **1) Project Size Rating**

The Project Size Rating evaluates the potential viability of potential agricultural productivity on a property. Generally, high quality soils (high rate of economic return per acre planted) only need to be present in relatively small quantities on a property to be considered important, whereas lower quality soils (low or moderate rate of economic return per acre planted) need to be present in larger quantities to be considered important.

The Project Size Rating corresponds with the acreage of each LCC Class identified on a property, which are grouped together to form three (3) categories, with numeric scores assigned based on the quality and quantity of soils. Table 3, *Project Size Scoring*, summarizes the California LESA Model scores for all soil and acreage combinations. For properties with different map units within the subject property, the mapping unit that generates the highest Project Size Score is used as the final Project Size Score for the property. The Project Size Score accounts for 15% (0.15) of the total California LESA Model Score.<sup>6</sup>

**Table 3 Project Size Scoring**

| LCC Class I or II soils |        | LCC Class III soils |        | LCC Class IV or lower |        |
|-------------------------|--------|---------------------|--------|-----------------------|--------|
| Acreage                 | Points | Acreage             | Points | Acreage               | Points |
| 80 or above             | 100    | 160 or above        | 100    | 320 or above          | 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     |
| Fewer than 10           | 0      | 20-39               | 30     | Fewer than 40         | 0      |
|                         |        | 10-19               | 10     |                       |        |
|                         |        | Fewer than 10       | 0      |                       |        |

Source: (CDC, 1997, Table 3)<sup>6</sup>

### **2) Water Resources Availability Rating**

The Water Resources Availability Rating measures the reliability of a property's water resources that could be used for agricultural production during non-drought and drought years (water availability score) and the proportion of the property served by each water source (weighted availability score). The water availability score established by the California LESA Model is summarized in Table 4, *Water Resource Availability Scoring*. The total Water Resource Score is the sum of the weighted availability score(s). The Water Resources Availability score accounts for 15% (0.15) of the total California LESA Score.<sup>6</sup>

**Table 4 Water Resource Availability Scoring**

| Non-Drought Years                                                                                                               |                       |                       | Drought Years       |                       |                       | SCORE |
|---------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|---------------------|-----------------------|-----------------------|-------|
| Restrictions                                                                                                                    |                       |                       | Restrictions        |                       |                       |       |
| Irrigation Feasible                                                                                                             | Physical Restrictions | Economic Restrictions | Irrigation Feasible | Physical Restrictions | Economic Restrictions |       |
| YES                                                                                                                             | NO                    | NO                    | YES                 | NO                    | NO                    | 100   |
| YES                                                                                                                             | NO                    | NO                    | YES                 | NO                    | YES                   | 95    |
| YES                                                                                                                             | NO                    | YES                   | YES                 | NO                    | YES                   | 90    |
| YES                                                                                                                             | NO                    | NO                    | YES                 | YES                   | NO                    | 85    |
| YES                                                                                                                             | NO                    | NO                    | YES                 | YES                   | YES                   | 80    |
| YES                                                                                                                             | YES                   | NO                    | YES                 | YES                   | NO                    | 75    |
| YES                                                                                                                             | YES                   | YES                   | YES                 | YES                   | YES                   | 65    |
| YES                                                                                                                             | NO                    | NO                    | NO                  | -- --                 | -- --                 | 50    |
| YES                                                                                                                             | NO                    | YES                   | NO                  | -- --                 | -- --                 | 45    |
| YES                                                                                                                             | YES                   | NO                    | NO                  | -- --                 | -- --                 | 35    |
| YES                                                                                                                             | YES                   | YES                   | NO                  | -- --                 | -- --                 | 30    |
| Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years           |                       |                       |                     |                       |                       | 25    |
| Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years) |                       |                       |                     |                       |                       | 20    |
| Neither irrigated nor dry land production feasible                                                                              |                       |                       |                     |                       |                       | 0     |

Source: (CDC, 1997, Table 5)<sup>6</sup>

### 3) Surrounding Agricultural Land Rating

The Surrounding Agricultural Land Rating accounts for the potential effect of development on properties containing important agricultural resources that surround a property and is dependent on the amount of agricultural land or related open space within a project's "Zone of Influence" (ZOI). The ZOI is determined by drawing the smallest rectangle that will completely contain the property on a map (Rectangle A) and creating a second rectangle that extends 0.25-mile beyond Rectangle A on all sides (Rectangle B). All parcels that are within or intersected by Rectangle B are included within the project's ZOI.<sup>6</sup> Refer to Figure 3, *Zone of Influence*.

The Surrounding Agricultural Land Rating is determined by the proportion of land within a project's ZOI that is currently being used for agricultural production. The Surrounding Agricultural Land Rating score established by the California LESA Model is summarized in Table 5, *Surrounding Agricultural Land Rating*. Data for surrounding agricultural land can be obtained from the Department of Conservation's Important Farmland Map Series, the Department of Water Resources' Land Use Map Series, locally derived maps, and/or inspection of the site. The surrounding agricultural land score accounts for 15% (0.15) of the total California LESA Model Score.<sup>6</sup>

**Table 5 Surrounding Agricultural Land Rating**

| Percent of Project's ZOI in Agricultural Use | Surrounding Agricultural Land Score |
|----------------------------------------------|-------------------------------------|
| 90 – 100%                                    | 100 Points                          |
| 80 – 89                                      | 90                                  |
| 75 – 79                                      | 80                                  |
| 70 – 74                                      | 70                                  |
| 65 - 69                                      | 60                                  |
| 60 - 64                                      | 50                                  |
| 55 - 59                                      | 40                                  |
| 50 - 54                                      | 30                                  |
| 45 - 49                                      | 20                                  |
| 40 - 44                                      | 10                                  |
| 40 <                                         | 0                                   |

Source: (CDC, 1997, Table 6)<sup>6</sup>

#### 4) Surrounding Protected Resource Land Rating

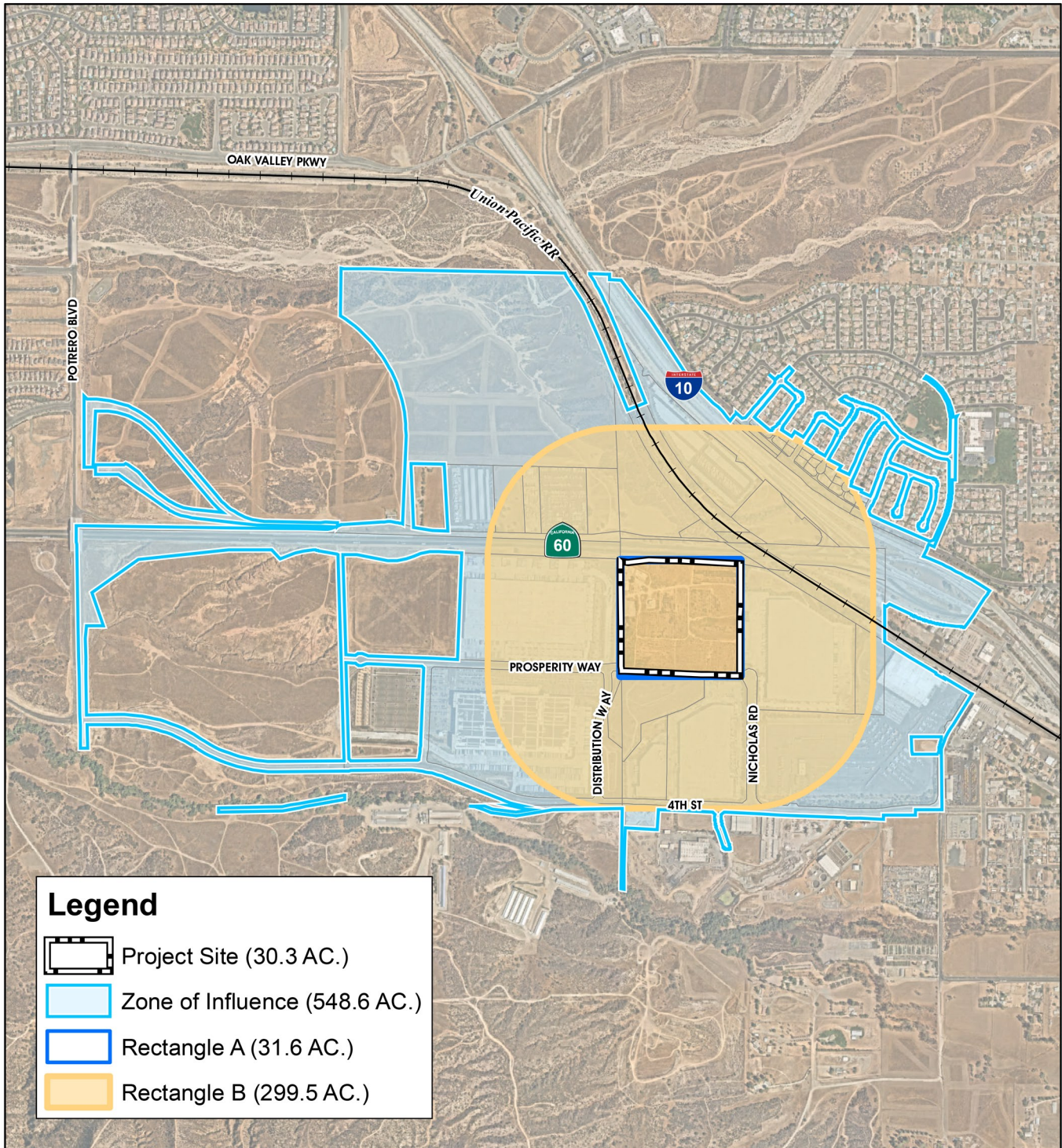
Similar to the Surrounding Agricultural Land Rating, the California LESA Model considers the potential effect of development on protected resource lands surrounding a property. Protected resource lands include Williamson Act contracted lands, publicly owned lands maintained as park, forest, or watershed resources, and lands with natural resource easements (e.g., agricultural, wildlife habitat, open space).

The Surrounding Protected Resource Land Rating is determined by the proportion of protected resource lands within a project's ZOI. The Surrounding Protected Resource Land Rating scoring system established by the California LESA Model is summarized in Table 6, *Surrounding Protected Resource Land Rating*. The Surrounding Protected Resource Land Score accounts for 5% (0.05) of the total California LESA Score.<sup>6</sup>

**Table 6 Surrounding Protected Resource Land Rating**

| Percent of Project's ZOI Defined as Protected | Surrounding Protected Resource Land Score |
|-----------------------------------------------|-------------------------------------------|
| 90 – 100%                                     | 100 Points                                |
| 80 – 89                                       | 90                                        |
| 75 – 79                                       | 80                                        |
| 70 – 74                                       | 70                                        |
| 65 - 69                                       | 60                                        |
| 60 - 64                                       | 50                                        |
| 55 - 59                                       | 40                                        |
| 50 - 54                                       | 30                                        |
| 45 - 49                                       | 20                                        |
| 10 - 44                                       | 10                                        |
| 40 <                                          | 0                                         |

Source: (CDC, 1997, Table 7)<sup>6</sup>



Source(s): ESRI, RCTLMA (2021), Nearmap Imagery (2020)

Figure 3

## **IV. PROPERTY EVALUATION**

### **A. Land Evaluation (LE)**

The LE sub-score measures the agricultural suitability of soils identified on a property by using the Land Capability Classification (LCC) and Storie Index rating for each soil map unit. The property consists of four (4) soil map units including: Placentia fine sandy loam (P|D), Ramona sandy loam (2 to 5 percent slopes) (RaB2), Ramona sandy loam (0 to 5 percent slopes) (RaB3), and Terrace escarpments (TeG).<sup>7</sup> As shown in Table 7, *Land Capability Classification Score*, the total LCC Score for the property is 62.8 and as shown in Table 8, *Storie Index Score*, the total Storie Index Score for the property is 79.4. As shown in Table 9, the LE sub-score is 35.6.

**Table 7 Land Capability Classification Score**

| Soil Map Unit | Property Acres | Percentage of Property | LCC <sup>1</sup> | LCC Rating | LCC Score |
|---------------|----------------|------------------------|------------------|------------|-----------|
| P D           | 16.6           | 55.4                   | IVe              | 50         | 27.7      |
| RaB2          | 9.9            | 32.9                   | IIe              | 90         | 29.6      |
| RaB3          | 2.2            | 7.3                    | IIIe             | 70         | 5.11      |
| TeG           | 1.3            | 4.3                    | VIIe             | 10         | 0.43      |
| Totals        | 30             | 100                    |                  |            | 62.8      |

Source: (USDA, 2021)<sup>7</sup>

**Table 8 Storie Index Score**

| Soil Map Unit | Property Acres | Percentage of Property | Storie Index | Storie Index Score |
|---------------|----------------|------------------------|--------------|--------------------|
| P D           | 16.6           | 55.4                   | 79           | 43.8               |
| RaB2          | 9.9            | 32.9                   | 88           | 29.0               |
| RaB3          | 2.2            | 7.3                    | 90           | 6.6                |
| TeG           | 1.3            | 4.4                    | N/A          | N/A                |
| Totals        | 30             | 100                    |              | 79.4               |

Source: (USDA, 2021)<sup>7</sup>

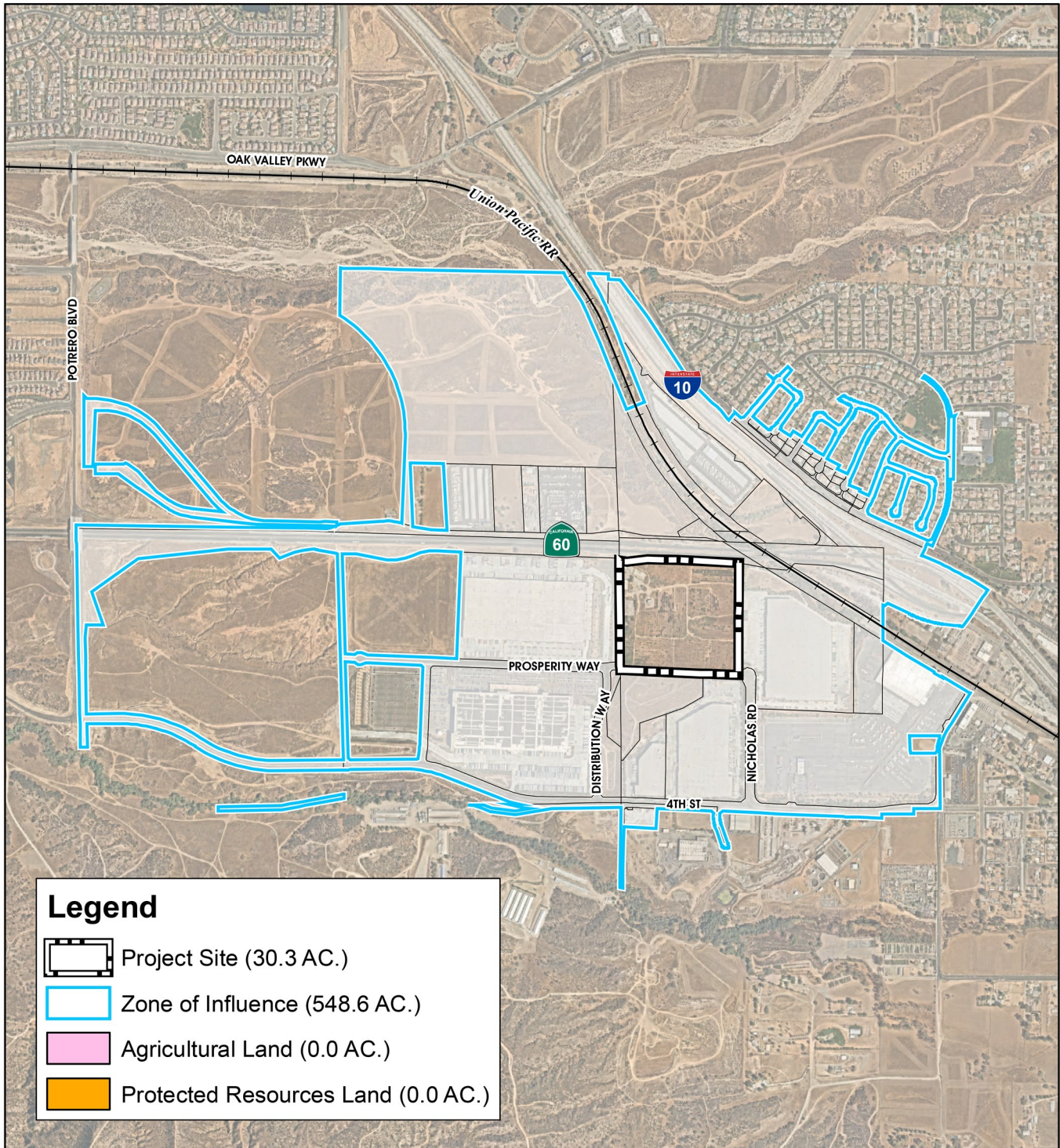
**Table 9 LE Sub-Score**

|                    | Factor Scores | Factor Weight <sup>1</sup> | Weighted Factor Scores |
|--------------------|---------------|----------------------------|------------------------|
| <b>LE Factors</b>  |               |                            |                        |
| LCC                | 62.8          | 0.25                       | 15.7                   |
| Storie Index       | 79.4          | 0.25                       | 19.9                   |
| <b>LE Subtotal</b> |               | <b>0.50</b>                | <b>35.6</b>            |

<sup>1</sup> Defined by LESA Model.

### **B. Site Assessment (SA)**

The SA subscore measures the agricultural suitability of the property based on the water resources availability, surrounding agricultural lands, surrounding protected resource lands, and project's size.



Source(s): ESRI, RCTLMA (2021), Nearmap Imagery (2022)

Figure 4

## 2) **Water Resource Availability**

Water is available to the property from two (2) on-site wells. Therefore, water is readily available to the entire property under non-drought and drought conditions. The Water Resources Availability Score for the Project site is 100.

## 3) **Surrounding Agricultural Land**

The Surrounding Agricultural Land Rating is dependent on the Project site's ZOI. As shown on Figure 4, *Surrounding Agricultural Land and Protected Resources Land*, there is no land within the ZOI under active agricultural production, including dairies. As such, the property's Surrounding Agricultural Land Score is zero.

## 4) **Surrounding Protected Resource Land**

As shown in Figure 4 there is no land identified as protected resource land within the property's ZOI. As such property's Surrounding Protected Resources Land Score is zero.

## 5) **Project Size**

According to Table 10, *Project Size Score*, the property has a Project Size Score of 30.

**Table 10 Project Size Score**

| Soil Type                              | Property Acreage |               |                   |
|----------------------------------------|------------------|---------------|-------------------|
|                                        | LCC Class I-II   | LCC Class III | LCC Class IV-VIII |
| P D                                    | 0.0              | 0.0           | 16.6              |
| RaB2                                   | 10.1             | 0.0           | 0.0               |
| Rab3                                   | 0.0              | 2.2           | 0.0               |
| TeG                                    | 0.0              | 0.0           | 1.4               |
| <b>Total Acres</b>                     | 10.1             | 2.2           | 18.0              |
| <b>Project Size Scores<sup>1</sup></b> | 30               | 0             | 0                 |
| <b>Highest Project Size Score</b>      | <b>30</b>        |               |                   |

Source: (USDA, 2021)<sup>7</sup>

<sup>1</sup>Refer to Table 3 for Project Size Scoring, which is based on LCC Class and acreage. The Project has 10.1 acres of LCC Class I or II soil, which equates to a score of 30. Fewer than 10 acres under LCC Class III soils and fewer than 40 acres of LCC Class IV or lower soil equates to a score of 0.

## C. **Total LESA Score**

As identified in Table 11, *Total LESA Score Sheet*, the property has a total LESA Score of 55.1.

**Table 11 Total LESA Score Sheet**

|                    | Factor Scores | Factor Weight <sup>6</sup> | Weighted Factor Scores |
|--------------------|---------------|----------------------------|------------------------|
| <b>LE Factors</b>  |               |                            |                        |
| LCC                | 62.8          | 0.25                       | 15.7                   |
| Storie Index       | 79.4          | 0.25                       | 19.9                   |
| <b>LE Subtotal</b> |               | <b>0.50</b>                | <b>35.6</b>            |
| <b>SA Factors</b>  |               |                            |                        |

|                               | <b>Factor Scores</b> | <b>Factor Weight<sup>6</sup></b> | <b>Weighted Factor Scores</b> |
|-------------------------------|----------------------|----------------------------------|-------------------------------|
| Water Resource Availability   | 100                  | 0.15                             | 15.00                         |
| Surrounding Agricultural Land | 0                    | 0.15                             | 0                             |
| Protected Resource Land       | 0                    | 0.05                             | 0                             |
| Project Size                  | 30                   | 0.15                             | 4.5                           |
| <i>SA Subtotal</i>            |                      | <i>0.50</i>                      | <i>19.5</i>                   |
| <b>Final LESA Score</b>       |                      |                                  | <b>55.1</b>                   |

With a total LESA score between 40 to 59 points, a property is determined to be an important agricultural resource if its LE and SA subscores are each greater than or equal to 20 points. The property's Total LESA Score is between 40 and 59 and its SA subscore is less than 20 points; thus, the property is determined to not be an important agricultural resource under CEQA and the conversion of Prime Farmland and Unique Farmland on the property to non-agricultural land use would be less than significant.

#### **D. Determination**

the Project site received a LE subscore of 35.6 and a SA subscore of 19.5, which sums to a final LESA score of 55.1. Pursuant to the LESA Model scoring system, a final LESA score between 40 to 59 points corresponds to a significant impact when both the LE and SA factor scores are each equal to or greater than 20. Because the Project area received a final LESA score of 55.1, with the SA factor score less than 20, the Project's the conversion of Farmland to a non-agricultural use would be less than significant.