5.2 AGRICULTURE AND FORESTRY RESOURCES

5.2.1 INTRODUCTION

This section describes the existing environmental and regulatory settings, and analyzes the Project's potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance for non-agricultural use; conflict with existing zoning for agricultural use, or a Williamson Act contract; conflict with existing zoning for, or cause rezoning of, forest land or timberland zoned Timberland Production; result in the loss of forest land or conversion of forest land to non-forest use; or involve other changes in the existing environment that, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

The proposed General Plan includes annexations, transfers of responsibility, and detachments, and as such, the Local Agency Formation Commission for San Bernardino County (SBLAFCO) is a responsible agency. The definition of prime agricultural land used by LAFCOs is found in Government Code § 56064. This definition of prime agricultural land differs from the definition of Agricultural Land used in CEQA and found in CEQA Statute § 21060.1. As such, this section analyzes the Project's potential impacts concerning Agricultural Land pursuant to CEQA Statute § 21060.1, whereas **Section 5.11: Land Use and Planning** analyzes the Project's potential impacts concerning prime agricultural land pursuant to Government Code § 56064 and potential to conflict with SBLAFCO's goal to discourage premature conversion of prime agricultural lands to urban uses.

Proposed General Plan

The proposed General Plan information in this section is based on methodology and information discussed in **Section 5.2.3** and **Section 5.2.4**, respectively.

Barstow International Gateway Project (BIG)

BIG-related information in this EIR section is based in part on the following study:

- *Barstow International Gateway Land Evaluation Site Assessment Model*; see **Appendix 5.2 BIG-1: California LESA Model**.

Summary of Findings – Proposed General Plan

There are no forestland or timberlands in the City. While the State of California (State) designates most of the proposed General Plan area as "Grazing Land," portions of the proposed General Plan area include land that the State considers important farmland. Future development in the proposed General Plan area would convert Prime Farmland, Farmland of Statewide Importance, and Unique Farmland (the three categories of important farmland CEQA considers significant and referred to as "Agricultural Land"). There is no zoning for agricultural use within the City. However, within areas that would be annexed into the City under SBLAFCO Actions A and B, there is existing County land zoned for agricultural use that would

be pre-zoned for urban uses. Annexation and development of these lands would conflict with existing zoning for agricultural use due to the conversion of Agricultural Land to urban uses. There are no Williamson Act contracts (land owner contracts with the County to keep land in agriculture) within the City limits, there are Williamson Act contracts outside the City limits but within the City's unincorporated Sphere of Influence (SOI). The City would not annex lands with Williamson Act Contracts as there is neither agricultural zoning, nor a mechanism for the City to continue the contract.

Summary of Findings – Barstow International Gateway

BIG would affect local agriculture by converting approximately 312 acres of Agricultural Land (including Prime Farmland and Farmland of Statewide Importance) to a non-agricultural use. Although BIG would affect agriculture, these impacts are below the threshold for significance and do not require mitigation, given the small proportion of Agricultural Land compared to BIG's overall footprint. The existing zoning for agricultural use within BIG's footprint totals approximately 608 acres, all in the County. The portion of the BIG Specific Plan area with zoning for agricultural use (approximately 598 acres) that would be annexed to the City under SBLAFCO Action A would be rezoned to BIG Specific Plan, as part of the proposed General Plan, thus, no conflict with existing zoning would occur. Similarly, BIG's off-site improvements with County zoning for agricultural use would be allowed uses, thus, would not conflict with existing County zoning. Furthermore, the area does not contain any forest lands or timberlands, so there would be no impacts related to the loss or conversion of forest areas. Overall, BIG would not result in significant conversion of agricultural lands.

5.2.2 REGULATORY SETTING

5.2.2.1 Federal

There are no federal regulations concerning agriculture and forestry resources that are applicable to the Project.

5.2.2.2 State

California General Plan Law

The California Government Code (§ 65302(d)) requires a general plan to include an Open Space and Conservation Element for the conservation, development, and utilization of natural resources—including water and its hydraulic force, forests, soils, rivers, and other waters, harbors, fisheries, wildlife, minerals, and other natural resources. The Open Space and Conservation Element must consider the effect of development on natural resources that are on public lands. The element must also cover:

- The reclamation of land and waters.
- Prevention and control of the pollution of streams and other waters.
- Regulation of the use of land for the accomplishment of the conservation plan.
- Prevention, control, and correction of the erosion of soils, beaches, and shores.
- Protection of watersheds.

- Location, quantity, and quality of the rock, sand, and gravel resources.
- Waterways, flood corridors, riparian habitats, and land that may accommodate floodwater for groundwater recharge and stormwater management.

In October 2017, the State legislature passed Senate Bill (SB) 732 which authorizes a city to develop an agricultural land component of the open space element or a separate agricultural element in its general plan and authorizes the State of California Department of Conservation to award grants, bond proceeds, and other assistance provided the element meets certain requirements.

California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965 (California Government Code, § 51200 et seq.), commonly known as the Williamson Act, provides a property tax incentive for the voluntary enrollment of agricultural and open space lands in contracts formed between a county or city and a landowner. A Williamson Act contract restricts specific parcels of land to agricultural or related open space use, and compatible uses defined in State law and local ordinances. Private land within locally designated agricultural preserve areas is eligible for enrollment under a contract. Williamson Act contracts are held for a minimum of 10 years. The contract is renewed automatically each year, maintaining a constant 10-year contract. Under such contracts, the County Assessor calculates the property value for property tax purposes based on agricultural use instead of the property's fair market value, thereby providing a financial incentive to conserve agricultural or open space uses. In theory, the difference between actual land value and the Williamson Act protected value was supposed to be made up through additional State funding. The adoption of Proposition 13 in 1978 changed the method of property tax increases statewide, effectively reducing the importance of the Williamson Act as a means of limiting property tax.

Termination of a Williamson Act contract can occur for any of the following reasons:

- **Nonrenewal**. A landowner or local government can initiate a Notice of Nonrenewal for all or part of the contracted land. The Williamson Act contract would terminate 9 years after the filing of a notice of nonrenewal. Only a landowner can petition for a contract nonrenewal.
- **Cancellation**. A landowner can submit an application to the local government requesting the contract be canceled for a portion or the entirety of the contracted area.
- **Easement Exchange**. This is a voluntary rescission process provided for local entities and landowners to cancel the Williamson Act contract and simultaneously dedicate a permanent agricultural conservation easement on other land.
- **Public Acquisition of Contracted Land**. This process refers to the acquisition of land located within an agricultural preserve or under a Williamson Act Contract. This method can only be used by an entity with authority to acquire land through eminent domain.

The Williamson Act also allows the preservation of agricultural land through the creation of Agricultural Preserves and Farmland Security Zones (FSZ).

- An agricultural preserve defines the boundary of an area within which a county or city will enter into Williamson Act contracts with landowners. The boundary is designated by resolution of the

board or city council having jurisdiction. Agricultural preserves must generally be at least 100 acres in size.

- An FSZ is an area created within an agricultural preserve by a county board of supervisors upon the request of a landowner or group of landowners. FSZ contracts offer landowners greater property tax reductions and have a minimum initial term of 20 years. Like Williamson Act contracts, FSZ contracts renew annually unless an owner files a Notice of Nonrenewal.

Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) is the only statewide agricultural land use inventory conducted on a regular basis. The California Department of Conservation administers the FMMP, under which it maintains an automated map and database system to record changes in agricultural land use. The FMMP categories include agricultural and non-agricultural lands, as described below. Each category is defined according to the U.S. Department of Agriculture (USDA) land inventory and monitoring criteria, as modified for California.

Important Farmland. Important Farmland is designated based on soil type or agricultural production; therefore, Important Farmland boundaries do not necessarily correspond to parcel boundaries. The Important Farmland categories identified under the FMMP (i.e., Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance) are described below.

- **Prime Farmland.** Prime Farmland is land with the best combination of physical and chemical features to sustain long-term agricultural crop production. These lands have the soil quality, growing season, and moisture supply necessary to produce sustained high yields. Soil must meet the physical and chemical criteria determined by the Natural Resources Conservation Service (NRCS). Prime Farmland must have been used for production of irrigated crops at some time during the four years prior to the FMMP's mapping date.
- **Farmland of Statewide Importance.** Farmland of Statewide Importance is similar to Prime Farmland but with minor differences, such as having greater slopes or soils with a lesser ability to store moisture. Farmland of Statewide Importance must have been used for production of irrigated crops at some time during the four years prior to the mapping date.
- **Unique Farmland.** Unique Farmland has lower quality soils than Prime Farmland or Farmland of Statewide Importance. Unique Farmland is used for producing the State's leading agricultural crops. These lands usually are irrigated but could include unirrigated orchards or vineyards found in some climatic zones. Unique Farmland must have been used for crops at some time during the four years prior to the mapping date.
- **Farmland of Local Importance.** Farmland of Local Importance is farmland that is important to the local agricultural community as determined by each county's board of supervisors and local advisory committees.

The FMMP focuses on Important Farmland that has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained yields of crops. Farmland of Local Importance can cover a broader range of agricultural uses and is initially identified by a local advisory

committee convened in each county by the FMMP in cooperation with the NRCS and the respective county board of supervisors.

CEQA Statute § 21060.1 defines three of the FMMP's Important Farmland categories—Prime Farmland, Farmland of Statewide Importance, and Unique Farmland—as "Agricultural Land" for purposes of CEQA analysis. CEQA Statute § 21095 directs the State Resources Agency to amend State CEQA Guidelines Appendix G to give lead agencies a method for ensuring that "the significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process," and also directs the Department of Conservation to develop a state-level Land Evaluation and Site Assessment (LESA) system. State CEQA Guidelines Appendix G refers to the LESA (1997) as an optional method that agencies may use in assessing whether impacts to agricultural resources are significant environmental effects.

Forestland and Timberland Protection

State regulations such as the Forest Taxation Reform Act of 1976 and the Z'berg-Nejedly Forest Practice Act of 1973 (California Forest Practice Act) provide for the preservation of forest lands from encroachment by other, incompatible land uses and for oversight of the management of forest practices and forest resources.

Public Resources Code Section 12220(g)

Public Resources Code § 12220(g) defines "forest land" for the purposes of CEQA. According to this section of the Public Resources Code, "forest land" is land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

Government Code Section 51104(g)

The California Timberland Productivity Act of 1982, like the Land Conservation Act, was passed to encourage the production of timber resources. Government Code Section 51104(g) defines "Timber," "Timberland," and "Timberland Production Zone" for the purposes of CEQA and "Timberland Preserve Zone," which may be used in city and county General Plans.

- **"Timber"** means trees of any species maintained for eventual harvest for forest production purposes, whether planted or of natural growth, standing or down, on privately or publicly owned land, including Christmas tree, but does not mean nursery stock.
- **"Timberland"** means privately owned land, or land acquired for State forest purposes, which is devoted to and used for growing and harvesting timber and compatible uses, and which is capable of growing an average annual volume of wood fiber of at least 15 cubic feet per acre.
- **"Timberland Production Zone"** or **"TPZ"** means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, "Timberland Preserve Zone" means "Timberland Production Zone."

County boards of supervisors may designate areas of timberland preserve, referred to as Timberland Production Zones, which restrict the land's use to the production of timber for an initial 10-year term in return for lower property taxes.

5.2.2.3 Local

County of San Bernardino Countywide Plan

The County adopted the Countywide Plan (CWP) in October 2020. The CWP Policy Plan addresses the physical, social, and economic issues facing the County's unincorporated portions. **Table 5.2-1: Countywide Plan Policy Plan – Relevant Agriculture and Forestry Goals and Policies** includes the agriculture and forestry-related goals and policies relevant to the Project. For applicability of the above CWP goals and policies to the Project; see **Section 5.0: Environmental Analysis**.

Table 5.2-1: Countywide Plan Policy Plan – Relevant Agriculture and Forestry Goals and Policies

Goal or Policy	
INFRASTRUCTURE AND UTILITIES ELEMENT	
Goal IU-1	**Water Supply. Water supply and infrastructure are sufficient for the needs of residents and businesses and are resilient to drought.**
Policy IU-1.5	**Agricultural water use. We encourage water-efficient irrigation and the use of non-potable and recycled water for agricultural uses.**
NATURAL RESOURCES ELEMENT	
Goal NR-7	The ability of property owners, farmers, and ranchers to conduct sustainable and economically viable agricultural operations.
Policy NR-7.1	**Protection of agricultural land.** We protect economically viable and productive agricultural lands from the adverse effects of urban encroachment, particularly increased erosion and sedimentation, trespass, and non-agricultural land development.
Policy NR-7.2	**Preservation of Important Farmlands.** We require project applicants seeking to develop 20 or more acres of farmland (classified as prime, of statewide importance, or unique farmland) to non-agricultural uses to prepare an agricultural resource evaluation prior to project approval. The evaluation shall use generally accepted methodologies to identify the potentially significant impact of the loss of agricultural land as well as the economic viability and sustainability of future agricultural use of the property, including long-term sustainability and economic viability of water resources. If the conversion is deemed significant, the County shall require mitigation at a 1:1 ratio of converted to preserved acreage through conservation easements, payment of its valuation equivalent if a fee mitigation program is established, or inclusion in a regional agricultural preservation program.
Policy NR-7.3	**Conservation and preservation incentives.** We support programs and policies that provide tax and economic incentives to conserve existing productive agricultural lands or preserve farmland classified as prime, of statewide importance, unique, or of local importance. We support land owners in establishing new and maintaining existing California Land Conservation (Williamson Act) contracts.
Policy NR-7.6	**Sustainable grazing practices.** We require all grazing on open rangelands to be compatible with the conservation of threatened and endangered species.

Source: County of San Bernardino. 2020. *Countywide Policy Plan.* https://countywideplan.sbcounty.gov/policy-plan/.

The CWP Policy Plan includes the following Policy Maps that address agriculture and forestry resources:

- **Policy Map NR-2 Parks and Open Space Resources:** This map depicts the County's National Forests.
- **Policy Map NR-5 Agricultural Resources:** This map depicts the County's prime farmland, farmland of statewide importance, and unique farmland.

See the **Section 5.2.4: Environmental Setting** below for further discussion concerning the above conditions and their potential presence in the Project study area.

Codified Ordinances of the County of San Bernardino

The Codified Ordinances of the County of San Bernardino (County Code) regulations addressing agriculture and forestry are provided below (County of San Bernardino, 2025). For applicability of the County Code standards to the proposed General Plan and BIG, see **Section 5.0: Environmental Analysis.**

County Code Title 8 Division 2: Land Use Zoning Districts and Allowed Land Uses. This division establishes the primary and overlay land use zoning districts applied to County property. The County Code does not include any forest land zoning districts but does include two zoning districts for agricultural use: AG (Agriculture) District and FW (Floodway) District. The County Code also includes two agricultural/related overlays: AA (Additional Agriculture) Overlay; and (AP) Agricultural Preserve Overlay. These County Code zoning districts and overlay are described below.

County Code Title 8 Division 2 Chapter 82.03: Agricultural and Resource Management Land Use Zoning Districts. This chapter addresses the County's agricultural and resource management zoning districts (i.e., AG and FW), as described below.

- **AG District:** The AG zoning district provides sites for commercial agricultural operations, agriculture support services, rural residential uses, and similar and compatible uses. Open space and recreation use may occur on non-farmland lands within the AG land use zoning district.
- **FW District:** The FW land use zoning district provides sites for animal keeping, grazing, crop production, and similar and compatible uses.

County Code Title 8 Division 2 Chapter 82.07: Additional Agricultural (AA) Overlay. The AA Overlay is intended to create, preserve, and improve areas for small-scale and medium-scale agricultural uses utilizing productive agricultural lands for raising, processing, and the sale of plant crops, animals, or their primary products. It is an overlay where agricultural uses exist compatibly with a variety of rural residential lifestyles.

County Code Title 8 Division 2 Chapter 82.08: Agricultural Preserve (AP) Overlay. The AP Overlay identifies properties within an established [State] agricultural preserve. The properties may be subject to a Land Conservation Contract executed between the landowner and the Board (Ibid).

County Code Chapter 85.02: Basic Review Procedures. This chapter contains the basic and alternative review procedures necessary to process development proposals in any land use zoning district.

City of Barstow 2015-2020 General Plan

The City adopted the City of Barstow 2015-2020 General Plan (2015 General Plan) in February 2015. The 2015 General Plan is the overarching guide for implementation of the Barstow Code, which defines development regulations and establishes zoning districts throughout the City. The 2015 General Plan does not include any land use designations, goals, or policies pertaining to agriculture or forestry resources (Barstow, 2015).

Code of the City of Barstow

The Code of the City of Barstow (Barstow Code) does not include any specific zoning for agricultural use or forest land. For applicability of the above Barstow Code standards to the proposed General Plan and BIG, see **Section 5.0: Environmental Analysis**.

5.2.3 METHODOLOGY FOR EVALUATING IMPACTS

This section defines the study area (i.e., affected environment) and summarizes the methodology used to analyze potential impacts concerning agriculture and forestry resources.

5.2.3.1 Definition of Study Area

The study area is the geographic boundary in which the environmental investigations were conducted specific to each resource topic.

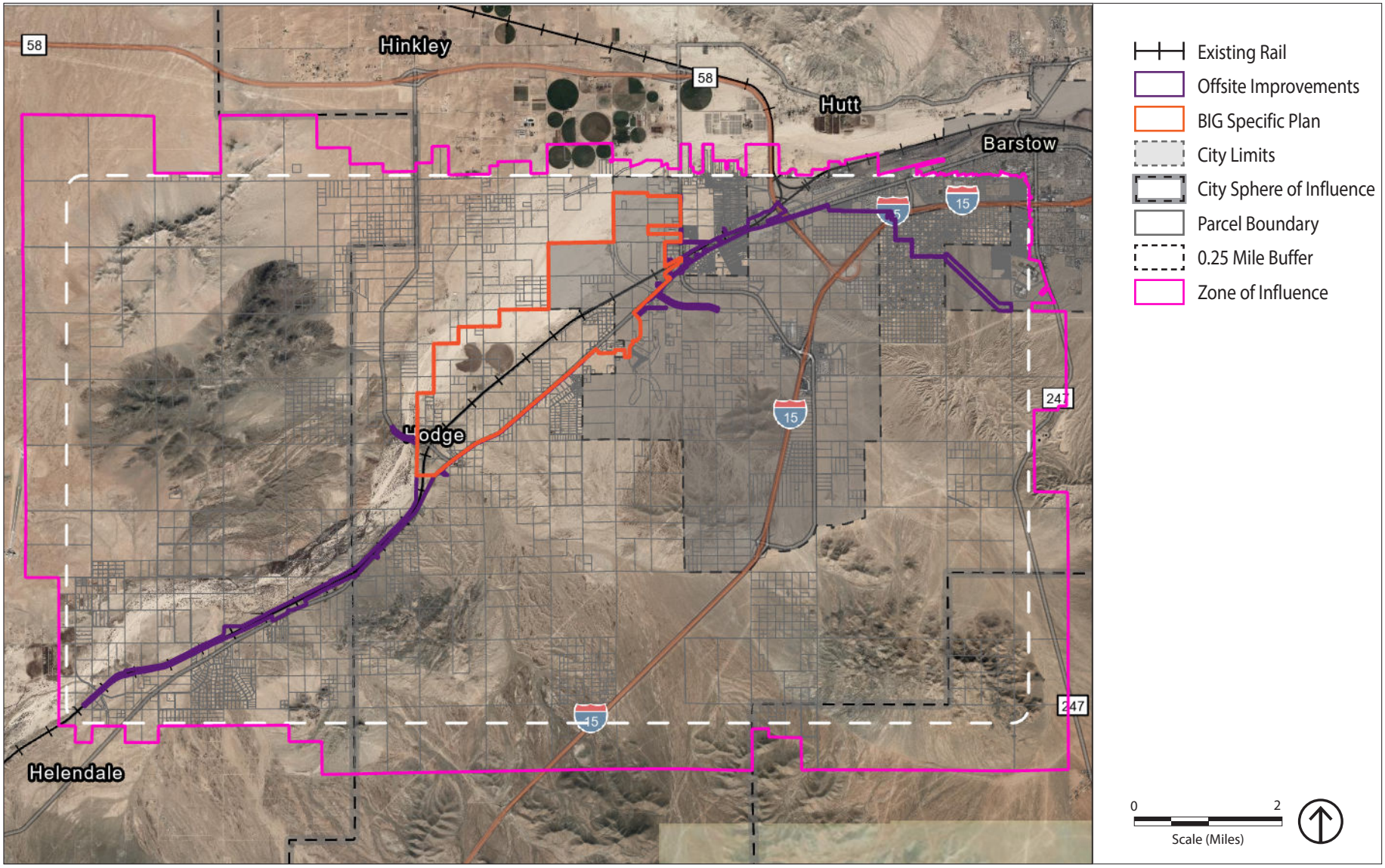
Proposed General Plan

The study area for the proposed General Plan is the City of Barstow and its Sphere of Influence (SOI) (proposed General Plan area) as shown in **Figure 3-1: Regional Vicinity Map** and **Figure 3-2: Local Vicinity Map - BIG.**

Barstow International Gateway

The study area for direct impacts concerning agriculture and forestry resources are the BIG off-site improvement areas which is based on applicable regulations of the jurisdiction in which they are located. Direct impacts concerning agriculture and forestry resources within the BIG Specific Plan area are analyzed in the proposed General Plan analysis given this area is within the City of Barstow.

The study area for BIG's indirect impacts concerning agricultural resources is the land within BIG's Zone of Influence (ZOI), which consists of the land near the BIG footprint that is likely to influence, and to be influenced by, the BIG footprint's agricultural use; see **Figure 5.2-1: Zone of Influence – BIG**. The ZOI is determined by creating the smallest rectangle that would completely contain the BIG footprint, then creating a second rectangle that extends 0.25 miles beyond the first rectangle; see **Appendix 5.2 BIG-1**. The ZOI, which includes all parcels that are contained within or are intersected by the second rectangle, minus the BIG footprint is approximately 86,635 acres; see **Figure 5.2-1**: Zone of Influence – BIG. Analysis of the agricultural resources within the ZOI considers acreage within the entirety of ZOI parcels, rather than acreage within the ZOI boundaries.



Sources:
County of San Bernardino, Y2023_PUA_Cache [aerial imagery], 2023.; County of San Bernardino, Cities and Towns [Data set], 2022.; County of San Bernardino, City Spheres of Influence [Data set], 2022.; Kimley-Horn, Appendix 5.2 BIG-1, 2025.

Figure 5.2-1
Zone of Influence – BIG

5.2.3.2 Methodology

Proposed General Plan

Geographic Information System (GIS) mapping based on the County assessor's parcel data, was used to identify the FMMP's farmland categories within the proposed General Plan area (see **Table 5.2-4: Agricultural Resources in the City and SOI – Proposed General Plan** later in this section). Additionally, data from the California Department of Conservation and California Department of Fish and Wildlife were used to determine if any lands in the proposed General Plan area are subject to a Williamson Act contract or if timberlands existed in the proposed General Plan area. Given the programmatic level of the proposed General Plan, the evaluation of potential physical impacts from the proposed General Plan is qualitative. Project-specific analyses would be required when a specific project has been proposed.

Public Resources Code Section 21060.1 defines three of the FMMP's Important Farmland categories—Prime Farmland, Farmland of Statewide Importance, and Unique Farmland—as "Agricultural Land" for purposes of CEQA analysis. Public Resources Code Section 21095 directs the State Resources Agency to amend State CEQA Guidelines Appendix G to give lead agencies a method for ensuring that "the significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process." A LESA is an optional method that agencies may use in assessing whether impacts to agricultural resources are significant environmental effects.

There are no agricultural zones in the City; however, the agricultural zones in the SOI, per the County's zoning, are as follows:

- Agriculture (AG)
- Agriculture 20 (AG-20)
- Agriculture with Agricultural Preserve Overlay (AG-AP)
- Floodway (FW)
- Floodway with Agricultural Preserve Overlay (FW-AP)
- Rural Living 10 with Agricultural Preserve Overlay (RL-10-AP)

Barstow International Gateway

FMMP Important Farmland Categories

Potential direct impacts to important farmland categories classified as agricultural land (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) were determined by reviewing the California Resources Agency maps prepared pursuant to the FMMP to determine whether any Important Farmlands exist within the study area. GIS mapping was used to identify the acres of different types of Important Farmland within the study area.

California Land Evaluation and Site Assessment (LESA). As discussed above, State CEQA Guidelines Appendix G refers to the California LESA Model to determine the potential significance of the conversion

of Important Farmland to non-agricultural use. Since BIG is a specific project, the evaluation of BIG's potential impacts is quantitative, rather than qualitative. Therefore, a project-specific LESA Model was prepared to identify the potentially significant impact of the loss of Agricultural Land within the BIG footprint and surrounding areas; see **Appendix 5.2 BIG-1**.

The LESA Model is a point-based approach for rating the relative importance of agricultural land resources based upon an evaluation of specific measurable factors (e.g., soil resource quality, project size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands). For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The project score becomes the basis for determining a project's potential significance under CEQA. **Table 5.2-2: California LESA Criteria – BIG** provides the various LESA factors and their respective weights.

Table 5.2-2: California LESA Criteria – BIG

Factor	Factor Weight	Explanation
Land Evaluation Factors		
Land Capability Classification	0.25	Measures of the soil capacity to produce crops, and thus serves as an indicator of how valuable a parcel may be as an agricultural resource.
Storie Index	0.25	Numerically represents the degree of soil suitability for general intensive agricultural production.
Land Evaluation Subtotal	**0.50**	
Site Assessment Factors		
Project Size	0.15	Recognizes the role that size plays in the viability of commercial agricultural operations
Water Resource Availability	0.15	Identifies the water sources that may supply the site, then determines whether different supply restrictions have the potential to occur during drought or non-drought years.
Surrounding Agricultural Land	0.15	Designed to measure the level of agricultural land use within the project's ZOI, which consists of the land near the project that is likely to influence, and to be influenced by, the project site's agricultural use.
Protected Resource Land	0.05	Protected resource lands are those lands with long term use restrictions that are compatible with or supportive of agricultural uses of land including publicly owned lands maintained as park, forest, or watershed resources; Williamson Act contracted lands; and lands with natural resource easements that restrict the land's conversion to urban or industrial uses.
Site Assessment Subtotal	**0.50**	

Source: California Department of Conservation. 1997. *California Agricultural Land Evaluation and Site Assessment Model*. https://www.conservation.ca.gov/dlrp/Pages/qh_lesa.aspx.

The maximum possible score on the California LESA Agriculture Worksheet is 100 points. As shown in **Table 5.2-3: LESA Model Significance Determination – BIG,** a project which includes conversion of Agricultural Land that scores less than 40 points is considered to have a less than significant impact. A project which includes conversion of Agricultural Land that scores between 40 to 59 points may be considered to have a significant impact only if both the LESA weighted scores for the project are greater

than or equal to 20 points each. A project which includes conversion of Agricultural Land that scores 60 points or greater is generally considered to have a significant impact under CEQA, depending on factors summarized in **Table 5.2-3: LESA Model Significance Determination – BIG**.

Table 5.2-3: LESA Model Significance Determination – BIG

Total LESA Score	Scoring Decision Heading
0 to 39 Points	Not considered significant
40 to 59 Points	Considered significant only if both the Land Evaluation and Site Assessment subtotals are each greater than or equal to 20 points
60 to 70 Points	Considered significant unless either of the Land Evaluation and Site Assessment weighted factor subtotals are less than 20 points
80 to 100 Points	Considered significant

Source: California Department of Conservation. 1997. *California Agricultural Land Evaluation and Site Assessment Model*.

Existing Zoning for Agricultural Use

To determine if BIG would conflict with existing zoning for agricultural use, the following document was reviewed:

- **County Zoning District Map** for BIG off-site improvements on lands that are currently within the unincorporated County and would not be annexed to the City.

GIS mapping was used to identify the acres of existing land zoned for agricultural use within the study area.

Williamson Act Contracts

The California Department of Conservation maintains a list and map of parcels subject to a Williamson Act contract. As noted by the Department of Conservation, Williamson Act contracts are entered into by the landowner and participating county or city; therefore, county or city data is the most accurate for Williamson Act contract status. The City does not maintain a list of currently enrolled parcels; therefore, the San Bernardino County Assessor list of parcels was used to map current Williamson Act contract parcels within the study area rather than the Department of Conservation list and map.

Existing Zoning for Forest Land and Timberland

To determine if BIG would conflict with existing zoning for forest land or timberland, the following documents were reviewed:

- **County Zoning District Map** for BIG off-site improvements on lands that are currently within the unincorporated County and would not be annexed to the City.
- **Proposed General Plan Land Use Map** for the BIG Specific Plan area and BIG off-site improvements on lands that are currently within and/or would be annexed to the City.
- **California Department of Fish and Wildlife (CDFW) California Forests and Timberlands in CDFW Regions Map** for BIG off-site improvements on lands that are not currently within and would not be annexed to the City.

Loss/Conversion of Forest Land

To determine if BIG would result in a loss or conversion of forest land, the following document was reviewed:

- **CWP Policy Map NR-2 Parks and Open Space Resources** for BIG off-site improvements on lands that are not currently within and would not be annexed to the City.

Conversion of Farmland to Non-Agricultural Use

To determine if BIG would result in a conversion of Agricultural Land to non-agricultural use, the following documents were reviewed:

- **County Zoning Map** for BIG off-site improvements on lands that are currently within the County and would not be annexed to the City.
- **Proposed General Plan Land Use Map** for the BIG Specific Plan area and BIG off-site improvements on lands that are currently within and/or would be annexed to the City.
- **Proposed City Zoning Map** for BIG Specific Plan area and BIG off-site improvements on lands that are currently within and/or would be annexed to the City.
- **California Department of Conservation FMMP Map** to determine whether any lands classified as Agricultural Land (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) exist within the study area.
- **NearMaps Aerial Maps** to determine whether any lands have historically or are currently being used for agricultural purposes.

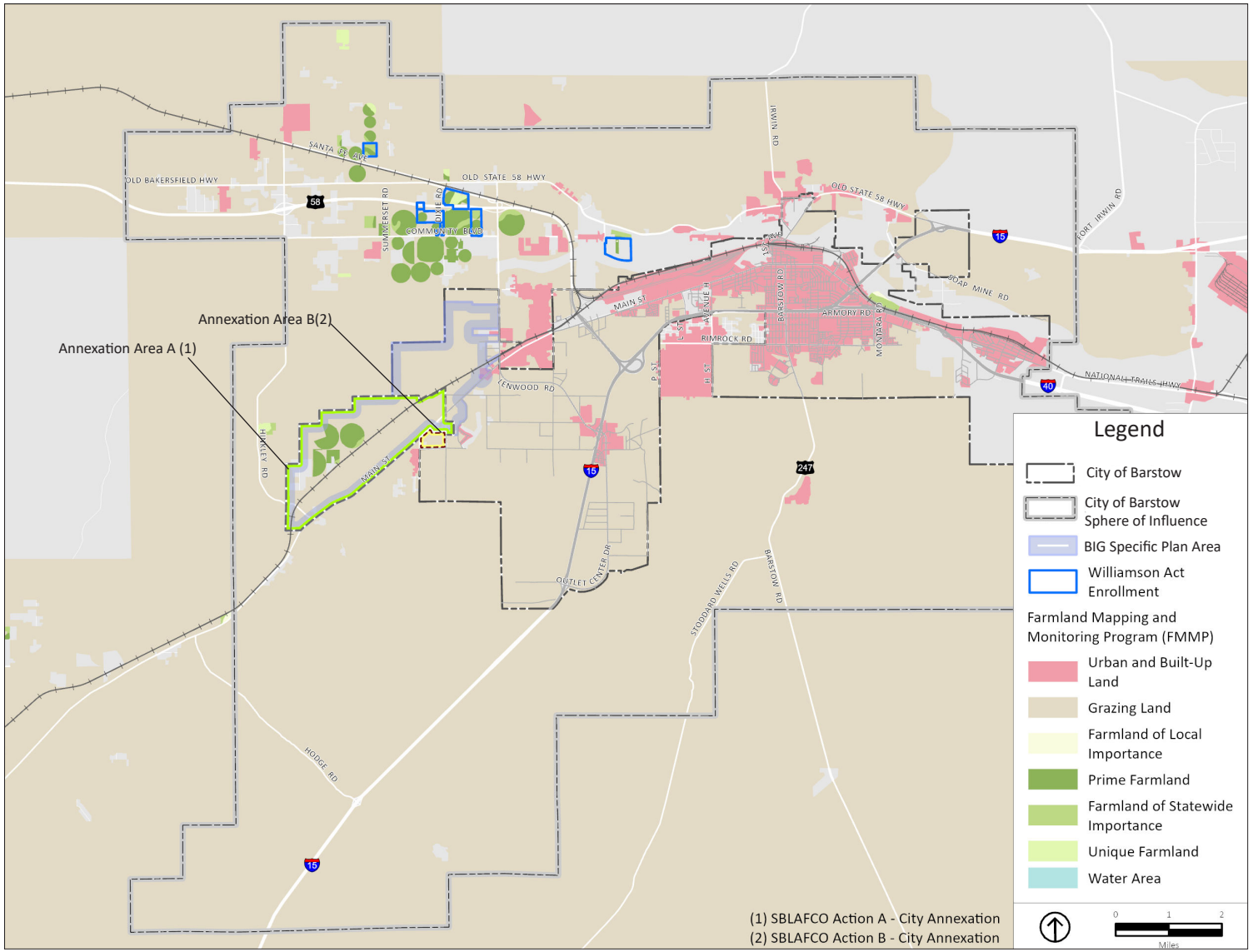
5.2.4 ENVIRONMENTAL SETTING

Proposed General Plan

There are no forestlands within the proposed General Plan area (CDFW, 2023). There are no Williamson Act contracts in effect in the City; however, there are Williamson Act contracts in effect within the SOI, as shown in **Figure 5.2-2: Agricultural Resources in the City and SOI – Proposed General Plan**.

The City does not have agricultural zones. The existing County zoning for agricultural use within the proposed General Plan area and the number of acres within each zone are noted below.

- 377 acres zoned Agriculture (AG)
- 81 acres zoned Agriculture 20 (AG-20)
- 355 acres zoned Agriculture with Agricultural Preserve Overlay (AG-AP)
- 2,826 acres zoned Floodway (FW)
- 209 acres zoned Floodway with Agricultural Preserve Overlay (FW-AP)
- 726 acres zoned Rural Living 10 with Agricultural Preserve Overlay (RL-10-AP)



Source:
California Department of Conservation, County of San Bernardino, 2025.

Figure 5.2-2
Agricultural Resources in the City and SOI - Proposed General Plan

Based on County zoning, there are 4,574 acres zoned for agricultural use in the proposed General Plan area, of which 598 acres are proposed for annexation under SBLAFCO Action A (SBLAFCO Action B does not contain zoning for agricultural use); see **Figure 5.2-9: Existing Zoning for Agricultural Use – BIG** later in this section. See **Impact 5.2-5: General Plan** below for an analysis of zoning/land use designation changes' potential to result in the conversion of Agricultural Land to non-agricultural use.

Pursuant to FMMP Important Farmland categories, the northern portion of the City is designated "Urban and Built-Up Land" and "Other Land;" most of the other lands in the City and most of the SOI are designated "Grazing Land" (see **Figure 5.2-2**). Parcels of land in the western portion of the SOI are designated "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." **Table 5.2-4: Agricultural Resources in the City and SOI – Proposed General Plan** summarizes the acreages of each Important Farmland category within the proposed General Plan area. FMMP Important Farmland categories (i.e., Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) constitute 1,958.59 acres of the proposed General Plan area, or approximately 1.5 percent of the total 127,160.13 acres within the proposed General Plan area.

Table 5.2-4: Agricultural Resources in the City and SOI – Proposed General Plan

FMMP Important Farmland Categories	City of Barstow	Sphere of Influence	Total	Percent of Proposed General Plan Area
Urban & Built-Up Land (acres)	5,374.39	2,826.21	**8,200.60**	**6.4%**
Grazing Land (acres)	15,696.21	87,255.45	**102,951.66**	**81.0%**
Farmland of Local Importance (acres)	10.92	0.76	**11.68**	**0.0%**
Prime Farmland (acres)	0	1,545.99	**1,545.99**	**1.2%**
Farmland of Statewide Importance (acres)	57.73	211.70	**269.43**	**0.2%**
Unique Farmland (acres)	0	143.17	**143.17**	**0.1%**
Other Land (acres)	5,285.25	8,752.11	**14,037.36**	**11.0%**
Area Not Mapped (acres)	0	0.24	**0.24**	**0.0%**

Source: Department of Conservation, 2018.

Barstow International Gateway

The approximately 5,000-acre BIG footprint is in the western part of the City and southwestern part of the County; see **Figure 3-1: Regional Vicinity Map** in **Section 3.0: Project Description**). The BIG study area includes properties which have historically or are currently used for agricultural purposes. Aside from these agricultural uses and undeveloped land, the BIG footprint contains 108 residential dwelling units and approximately 93,724 square feet of non-residential land uses (i.e., commercial and industrial uses). The BIG footprint can be characterized as scrub-like desert landscape (e.g., allscale scrub, creosote bush scrub, desert dunes, and disturbed habitat) with sparse rural development.

FMMP Important Farmland Categories

Table 5.2-5: Important Farmland Categories – BIG specifies the acreage of Agricultural Land within each site, according to FMMPs Important Farmland categories. FMMP's study area is contiguous with modern

soil surveys developed by the USDA and land is defined by a classification system that combines technical soil ratings and current land use is the basis for the Important Farmland Maps of these lands. Therefore, Important Farmland category boundaries do not necessarily correspond to parcel boundaries.[1]

Table 5.2-5: Important Farmland Categories – BIG

Important Farmland	BIG Footprint		Outside BIG Footprint			Total (Acres)
	Site A (Acres)[1]	Site B (Acres)[1]	Site 1 (Acres)	Site 2 (Acres)	Site 3 (Acres)	
Specific Plan (SP) Area						
Prime Farmland	--	292	--	--	--	292
Farmland of Statewide Importance	--	15	--	--	--	15
Unique Farmland	--	--	--	--	--	--
Farmland of Local Importance	--	--	--	--	--	0
Subtotal BIG Specific Plan Area	**0**	**307**	**--**	**--**	**--**	**307**
Off-Site Improvements						
Prime Farmland	--	--	--	--	--	--
Farmland of Statewide Importance	2	--	--	--	--	2
Unique Farmland	--	--	--	--	--	--
Farmland of Local Importance	4	--	--	--	--	4
Subtotal BIG Off-Site Improvements	**6**	**0**	**--**	**--**	**--**	**6**
Zone of Influence (ZOI)						
Prime Farmland	--	--	180	--	9	189
Farmland of Statewide Importance	3	--	0	15	6	24
Unique Farmland	--	--	--	27	--	27
Farmland of Local Importance	12	--	--	--	--	12
Subtotal BIG Zone of Influence	**15**	**0**	**180**	**42**	**15**	**252**
Total	**21**	**307**	**180**	**42**	**15**	**565**

Notes:
[1] See **Appendix 5.2 BIG-1: California LESA Model**.
[2] Sums may not total due to rounding

Source: California Department of Conservation. 2018. *2018 FMMP Shapefiles.* https://www.conservation.ca.gov/dlrp/fmmp/Pages/county_info.aspx.

Pursuant to the California Resources Agency FMMP, approximately 313 acres of Agricultural Land are found at two locations (Sites A and B) within the BIG footprint. It is noted that Site A and Site B correspond to Important Farmland locations and are unrelated to SBLAFCO Action A and B (which are annexation applications to be approved by SBLAFCO). Approximately 565 acres of Agricultural Land are found at four locations (Sites A, 1, 2, and 3) within BIG's ZOI (Sites 1, 2, and 3 are outside the BIG footprint). Each of the sites is comprised of multiple parcels, as depicted in **Figure 5.2-3: Important Farmland Categories – BIG** (California Department of Conservation, 2023). **Figure 5.2-4: Important Farmland Categories Site A – BIG**

[1] U.S. Department of Agriculture. 2023. *Important Farmland Categories.* https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx.

depicts the location of Site A, and **Figure 5.2-5: Important Farmland Categories Site B – BIG** depicts the location of Site B.

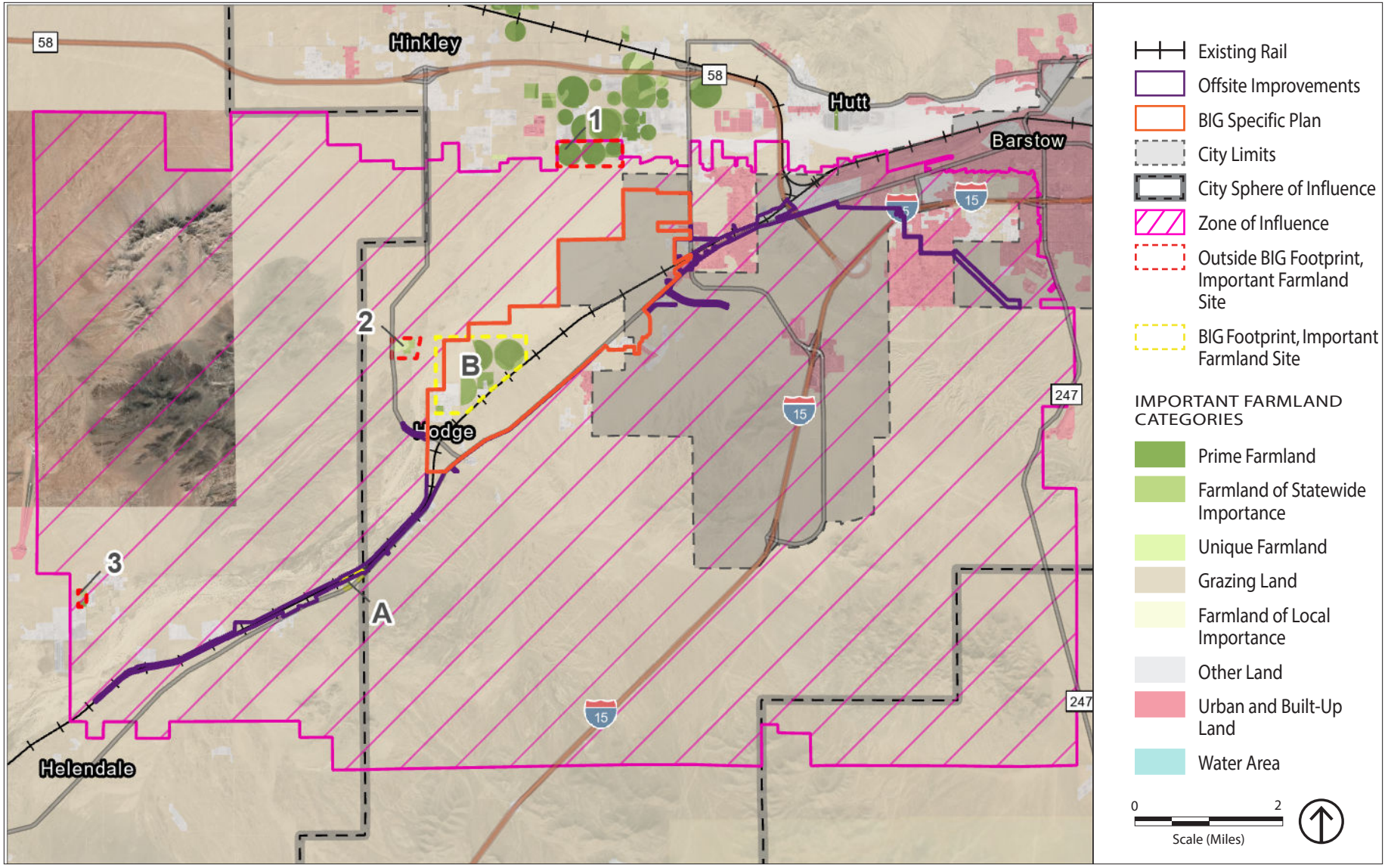
Site A: Figure 5.2-4: Important Farmland Categories Site A – BIG depicts the location of Site A, which is south of the existing BNSF mainline and west of Hinkley Road. Site A is comprised of small-scale livestock, crops, and grazing areas with one associated single-family residential dwelling unit, and BNSF right-of-way. Site A contains approximately 21 acres of Agricultural Land (Farmland of Statewide and Local Importance categories), including approximately 6 acres within the BIG off-site improvements area and approximately 15 acres within BIG's ZOI, but outside the BIG footprint; see **Table 5.2-5: Important Farmland Categories – BIG**. The 6-acre portion of Site A within BIG's off-site improvements area consists of earthen berms supporting existing tracks and a drainage ditch within the BNSF right-of-way. As previously noted, FMMP's study area is contiguous with modern soil surveys developed by the USDA, therefore, Important Farmland Category boundaries do not necessarily correspond with parcel boundaries. Although the BNSF right-of-way would not likely be used for agricultural purposes, it is nevertheless classified as Agricultural Land due to soil type on which the railroad berm lies. Based on review of aerial photographs, the BNSF right-of-way portion of Site A has been continuously used as railroad right-of-way since at least 1953 according to the earliest available aerial photograph (Environmental Data Resources, 2022).

Site B: Figure 5.2-5: Important Farmland Categories Site B – BIG depicts the location of Site B, which is north of the existing BNSF mainline, immediately south of the Mojave River, and east of Hinkley Road, and entirely within the BIG Specific Plan area. Site B is comprised of alfalfa croplands and three single-family residential dwelling units. Site B has been continuously used as farmland since the 1950s (TRC, 2022). Site B contains approximately 307 acres of Agricultural Land (Prime Farmland and Farmland of Statewide Importance categories); see **Table 5.2-5**.

In total, approximately 313 acres of Agricultural Land exist within Sites A and B within the BIG footprint.

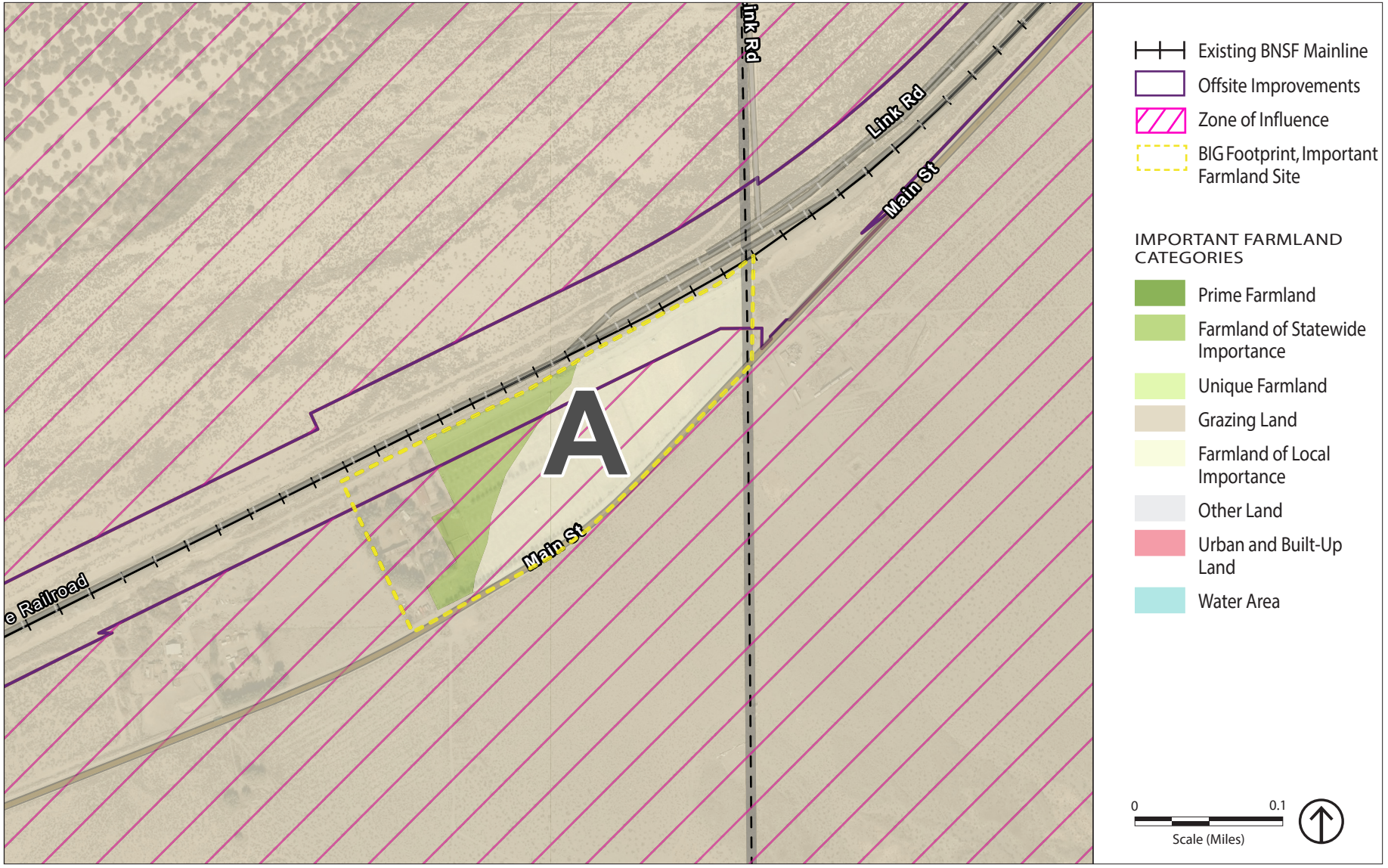
Site 1: Figure 5.2-6: Important Farmland Categories Site 1 – BIG depicts the location of this property, which is approximately 0.5 mile north of the proposed transload warehouse center area and near Lenwood Road. Site 1 is within BIG's ZOI but outside the BIG footprint. Site 1 contains approximately 180 acres of Agricultural Land (i.e., Prime Farmland category); see **Table 5.2-5: Important Farmland Categories – BIG**.

Site 2: Figure 5.2-7: Important Farmland Categories Site 2 – BIG depicts the location of this property, which is approximately 0.5 mile west of the proposed transload warehouse center area along Hinkley Road. Site 2 is within BIG's ZOI but outside the BIG footprint. Site 2 contains approximately 42 total acres of Agricultural Land (Farmland of Statewide Importance and Unique Farmland categories); see **Table 5.2-5: Important Farmland Categories – BIG**.



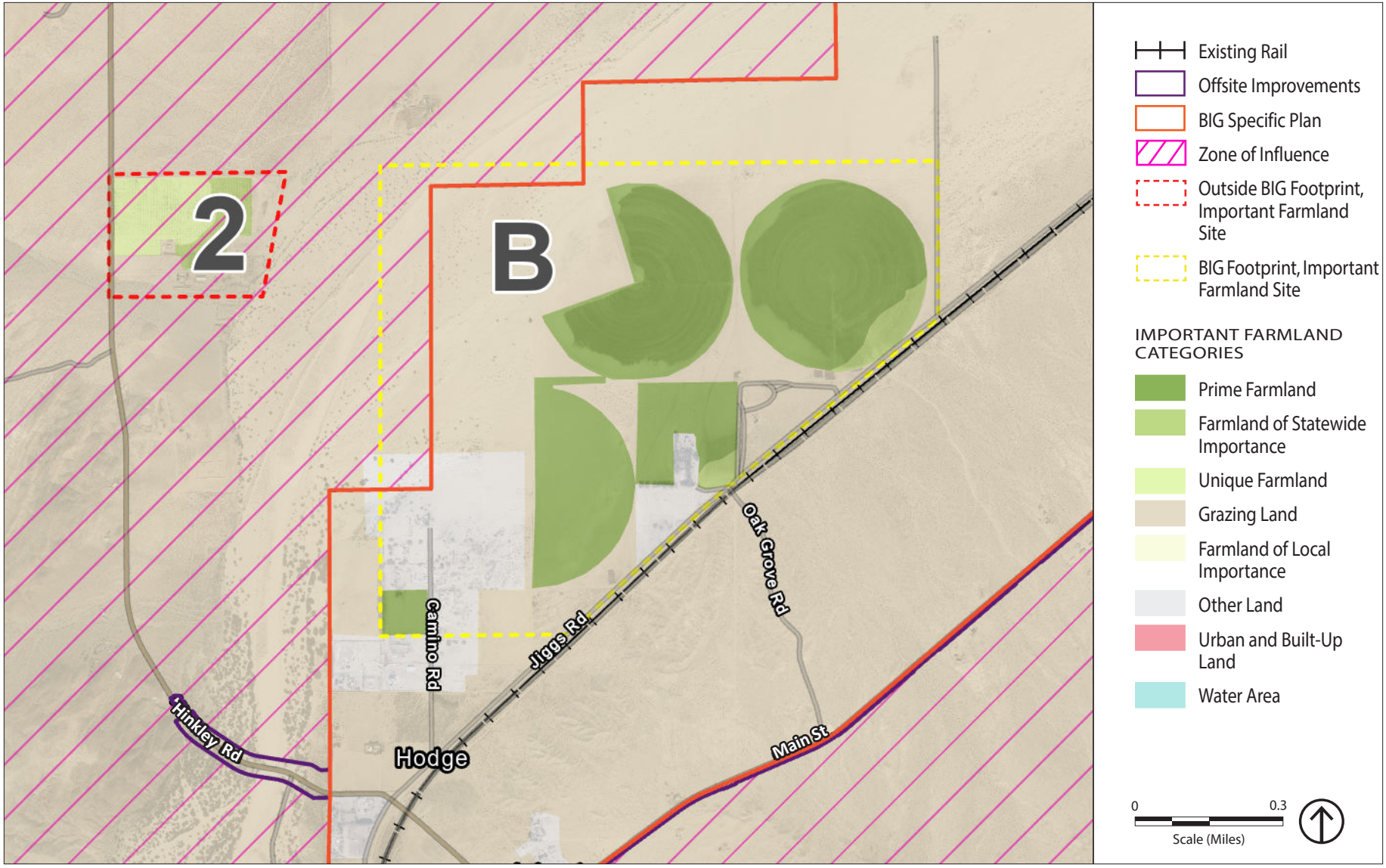
Sources:
County of San Bernardino, Y2023_PUA_Cache [aerial imagery], 2023.; County of San Bernardino, Cities and Towns [Data set], 2022.; County of San Bernardino, City Spheres of Influence [Data set], 2022.; California Department of Conservation, California Important Farmland: 2018 [Data set], 2018.

Figure 5.2-3
Important Farmland Categories – BIG



Sources: County of San Bernardino, Y2023_PUA_Cache [aerial imagery], 2023.; County of San Bernardino, Cities and Towns [Data set], 2022.; County of San Bernardino, City Spheres of Influence [Data set], 2022.; California Department of Conservation, California Important Farmland: 2018 [Data set], 2018.

Figure 5.2-4
Important Farmland Categories Site A – BIG



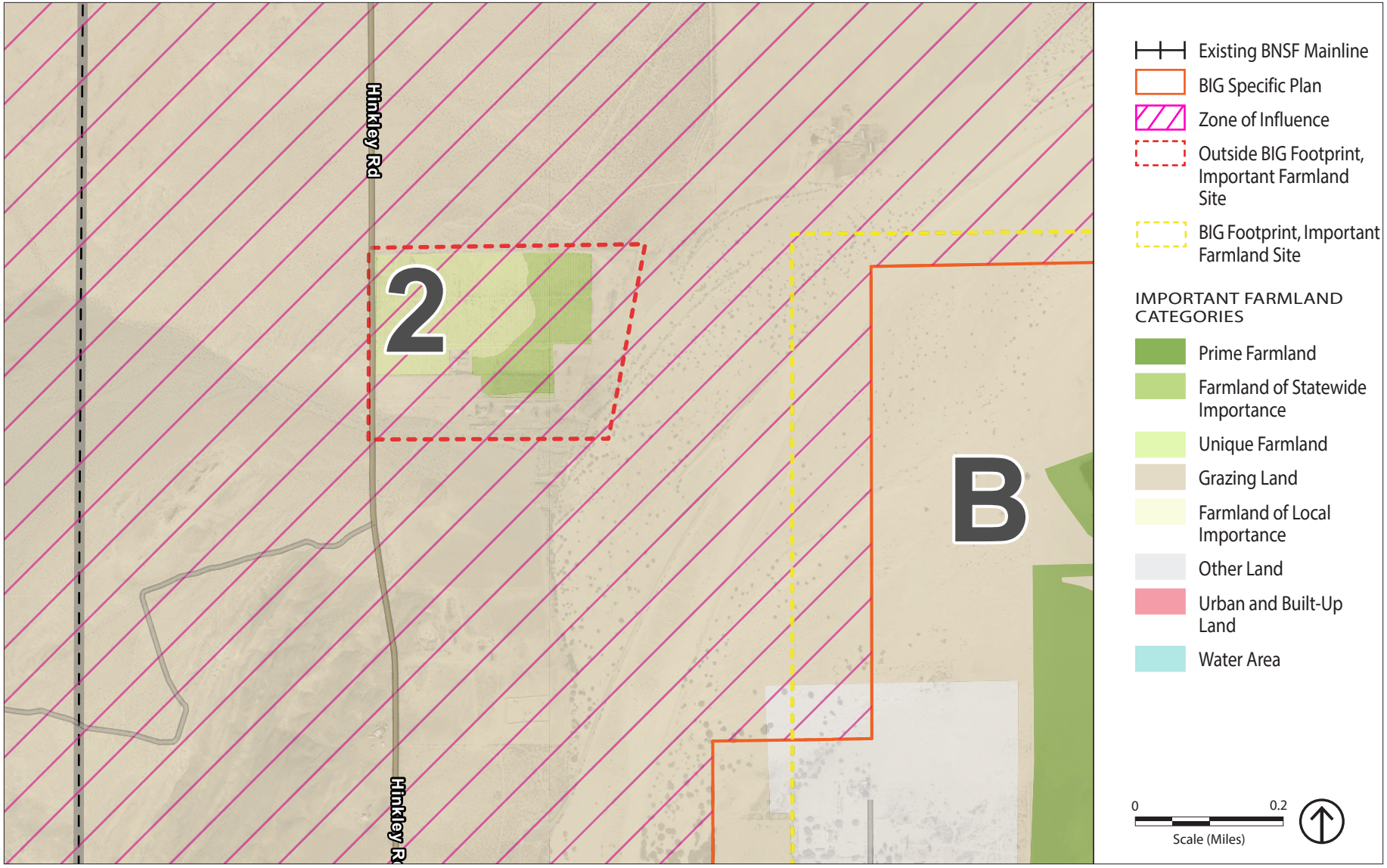
Sources:
County of San Bernardino, Y2023_PUA_Cache [aerial imagery], 2023.; County of San Bernardino, Cities and Towns [Data set], 2022.; County of San Bernardino, City Spheres of Influence [Data set], 2022.; California Department of Conservation, California Important Farmland: 2018 [Data set], 2018.

Figure 5.2-5
Important Farmland Categories Site B – BIG



Sources: County of San Bernardino, *Y2023_PUA_Cache* [aerial imagery], 2023.; County of San Bernardino, *Cities and Towns* [Data set], 2022.; County of San Bernardino, City Spheres of Influence [Data set], 2022.; California Department of Conservation, *California Important Farmland*: 2018 [Data set], 2018.

Figure 5.2-6
Important Farmland Categories Site 1 – BIG



Sources: County of San Bernardino, *Y2023_PUA_Cache* [aerial imagery], 2023.; County of San Bernardino, *Cities and Towns* [Data set], 2022.; County of San Bernardino, *City Spheres of Influence* [Data set], 2022.; California Department of Conservation, California Important Farmland: 2018 [Data set], *2018*.

Figure 5.2-7
Important Farmland Categories Site 2 – BIG

Site 3: Figure 5.2-8: Important Farmland Categories Site 3 – BIG depicts the location of this property, which is approximately 1.5 miles north of the proposed west lead track extension area along Indian Trail. Site 3 is within BIG's ZOI but outside the BIG footprint. Site 3 contains approximately 15 acres of Agricultural Land (i.e., Prime Farmland and Farmland of Statewide Importance categories); see **Table 5.2-5: Important Farmland Categories – BIG**.

County Zoning for Agricultural Use

The existing County zoning for agricultural use within BIG's footprint for the BIG Specific Plan area and the BIG off-site improvements areas, as identified in **Table 5.2-6: Existing Zoning for Agricultural Use – BIG**. Existing agricultural zoning within BIG's footprint totals approximately 608 acres, all of which are currently in the County. As previously discussed in **Section 5.2.2.3**, the City does not contain any agricultural zones.

Table 5.2-6: Existing Zoning for Agricultural Use – BIG

County Zoning	Acres	Percent of Total Agricultural Zoning in BIG
BIG SPECIFIC PLAN AREA		
Agriculture (AG)	20	3%
Agriculture 20 (AG-20)	80	13%
Agriculture with Agricultural Preserve Overlay (AG-AP)	110	18%
Rural Living 10 with Agricultural Preserve Overlay (RL-10-AP)	218	36%
Floodway (FW)	49	8%
Floodway with Agricultural Preserve Overlay (FW-AP)	121	20%
Subtotal County Specific Plan Area	**598**	**98%**
OFF-SITE IMPROVEMENTS AREA		
Agriculture (AG)	1	<1%
Floodway (FW)	9	1%
Subtotal County Off-Site	**10**	**2%**
Total County	**608**	**100%**

Note:
[1] Sums may not total due to rounding. Off-site improvement acreages area based on GIS data and are therefore estimates. Specific Plan acreages are based on survey data. Although the total Specific Plan acreage is 4,335, throughout the EIR, the Specific Plan acreage is referred to as 4,300 acres.

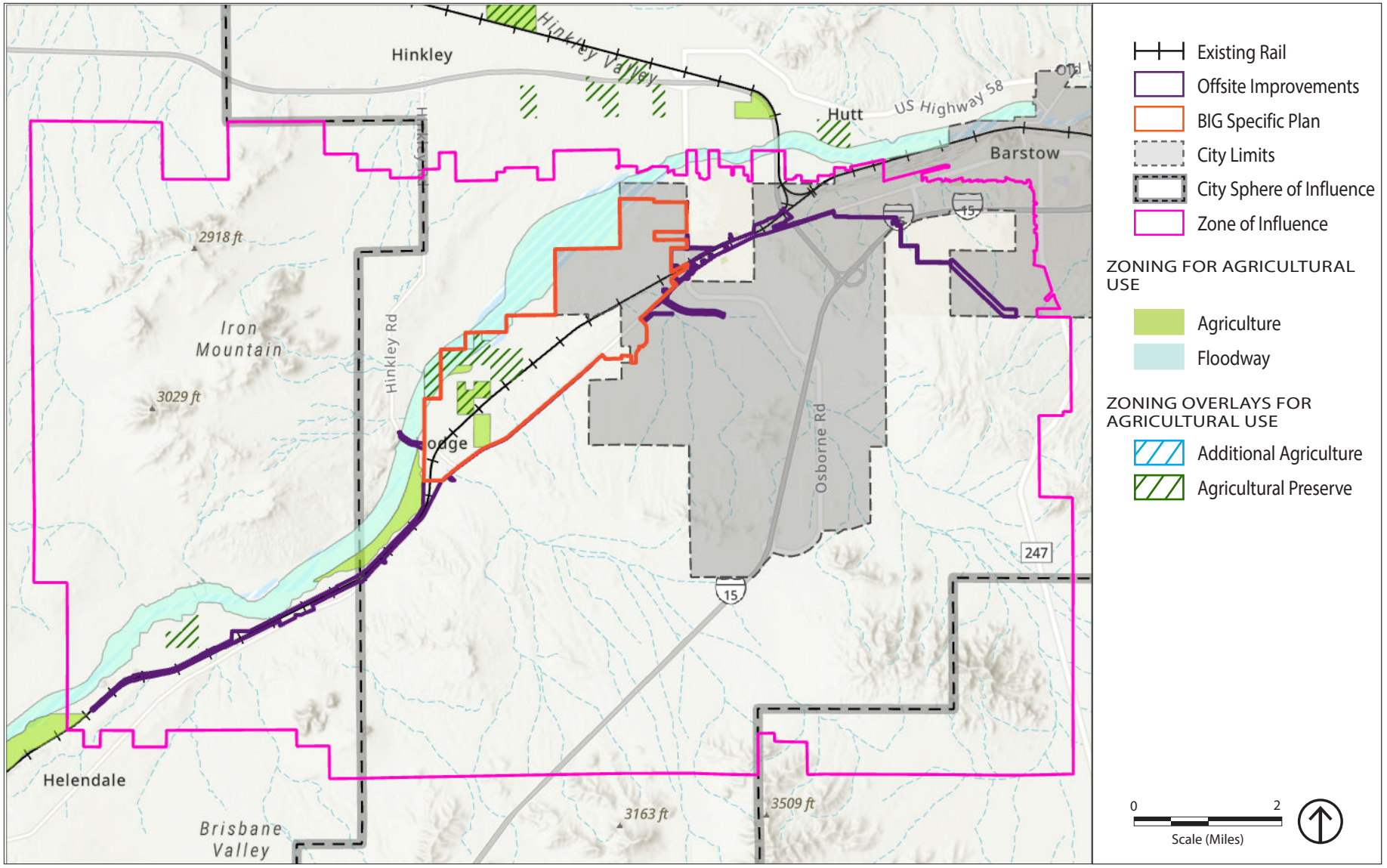
Source: Kimley-Horn and Associates, Inc., 2024.

The County zoning districts/overlays where agricultural uses are permitted or conditionally permitted are as follows: AG (Agriculture) District, FW (Floodway) District, AA (Additional Agriculture) Overlay, and (AP) Agricultural Preserve Overlay. As summarized in **Table 5.2-6: Existing Zoning for Agricultural Use – BIG** and depicted in **Figure 5.2-9: Existing Zoning for Agricultural Use – BIG**, the BIG footprint contains approximately 608 acres with County zoning for agricultural use, including approximately 598 acres within the BIG Specific Plan area and 10 acres within the BIG off-site improvements area.



Sources: County of San Bernardino, Y2023_PUA_Cache [aerial imagery], 2023.; County of San Bernardino, Cities and Towns [Data set], 2022.; County of San Bernardino, City Spheres of Influence [Data set], 2022.; California Department of Conservation, California Important Farmland: 2018 [Data set], 2018.

Figure 5.2-8
Important Farmland Categories Site 3 – BIG



Sources:
ESRI, Topographic [Basemap], 2024.; County of San Bernardino, *Cities and Towns* [Data set], 2022.; County of San Bernardino, *City Spheres of Influence* [Data set], 2022.; County of San Bernardino, *LU-1 Land Use Map* [Data set], 2020.

Figure 5.2-9
Existing Zoning for Agricultural Use – BIG

AG (Agriculture) District: The BIG footprint contains approximately 210 acres zoned AG, AG-20, and AG-AP District, including approximately 20 acres of AG, 80 acres of AG-20, and 110 acres of AG-AP District within the BIG Specific Plan area and 1 acre of AG District within the off-site improvements area. County Code § 82.01.020 specifies that the AG District provides for commercial agricultural operations, agriculture support services, rural residential uses and similar and compatible uses. Open space and recreation uses may also occur on non-farmed lands. Therefore, the AG zoning district's primary purpose is to support agricultural uses within the County.

FW (Floodway) District: The BIG footprint contains approximately 179 acres of zoned FW and FW-AP District, including approximately 49 acres of FW District and 121 acres of FW-AP District within the BIG Specific Plan area and 9 acres of FW District within BIG's off-site improvements area. All 179 acres within the FW District are within the Mojave River north of the existing BNSF tracks. This area is unlikely to be used for agricultural use given its location within the river. County Code § 82.01.020 specifies that the FW District provides for animal keeping, grazing, crop production, and similar and compatible uses. As noted in Table 82-4 of County Code § 82.03.040, crop production, horticulture, orchard, and vineyard land uses are an allowed use within the FW District. Therefore, one of the primary purposes of the FW zoning district is to support agricultural uses within the County.

AP (Agricultural Preserve) Overlay: The BIG footprint contains approximately 449 acres of land with an AP Overlay, including 110 acres of AG-AP, 218 acres of RL-10-AP, and 121 acres of FW-AP, all within the BIG Specific Plan area. County Code § 32.08.010 specifies that the AP Overlay identifies properties with an established agricultural preserve which is intended to protect vital agricultural uses by limiting allowed land uses to those that are compatible and supportive of agriculture and related uses and/or agricultural by-products.

Williamson Act Contracts

There are 321 parcels under a Williamson Act contract within the County (San Bernardino County Assessor, 2025). However, none are present within the BIG footprint.

Zoning for Forest Land/Agricultural Easements

The County Code and Barstow Code do not include any zoning for forest land, and none are present within or near the BIG footprint. There are no agricultural easements within the BIG footprint (California Natural Resources Agency, 2007).

Loss/Conversion of Forest Land

There is no forest land present within or near the BIG footprint.

5.2.5 IMPACT THRESHOLDS AND SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning agriculture and forestry resources. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning agriculture and forestry resources if it would:

- **Impact 5.2-1:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- **Impact 5.2-2:** Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- **Impact 5.2-3:** Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC § 1220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g));
- **Impact 5.2-4:** Result in the loss of forest land or conversion of forest land to non-forest use; or
- **Impact 5.2-5:** Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

5.2.6 PROJECT IMPACTS AND MITIGATION MEASURES

Applicable Proposed General Plan Policies

The following proposed General Plan policy is relevant to agriculture and forestry resources.

Open Space Conservation Element

- **Policy OSC-2.4 Agricultural uses and resources.** Allow indoor agriculture provided it is appropriately buffered for noise and odor from existing and planned residential uses, parks, schools, and public health facilities. Discourage commercial outdoor agricultural uses within city limits.

Impact 5.2-1	***Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

Proposed General Plan

As previously identified in **Table 5.2-4: Agricultural Resources in the City and SOI – Proposed General Plan**, Prime Farmland, Farmland of Statewide Importance, and Unique Farmlands (referred to as "Agricultural Land") represent approximately 2,000 acres (approximately 1.5 percent) of the approximately 127,160 total acres in the proposed General Plan area. Most of the proposed General Plan area (approximately 103,000 acres or approximately 81 percent) is designated grazing land; the loss of grazing land is not considered a significant environmental impact per PRC § 21060.1.

The LESA Model is a point-based approach for rating the relative importance of agricultural land resources based upon measurable features. See the BIG section below for BIG's LESA analysis. The model was not run for the proposed General Plan as the area is very large and there is a lack of site-specific information. Additionally, because the proposed General Plan is a long-term document, it is likely that site conditions

regarding the approximately 2,000 acres of Agricultural Land within the proposed General Plan area would change over time, and the current land use must be reflected in the LESA model at the time of development application. While it is possible that the LESA model results for the approximately 2,000 acres would show that conversion of Agricultural Land would not be significant, due to the reasons listed above, reliance on a LESA model for the entire proposed General Plan area would not appropriately analyze the significance of conversion of Agricultural Land.

As all property must be prezoned prior to annexation, and since the LESA evaluation considers current and historic use of Agricultural Land, the more appropriate time for conducting the LESA analysis for future developments under the proposed General Plan is when the City receives a request to prezone land in anticipation of annexation. While the proposed General Plan is intended to result in a compact urban form, future requests for annexation could convert Agricultural Land to non-agricultural use, therefore resulting in a potentially significant impact. Mitigation Measure **(MM) GP AG-1** establishes the requirement to first seek avoidance of development on Agricultural Land and then to utilize a LESA Model to evaluate the conversion of Agricultural Land as a part of future prezoning requests. If the conversion is found to be significant, **MM GP AG-1** requires the development to be conditioned to provide either an agricultural easement on existing farmland or create new agricultural land and easement at a 1:1 ratio. The City has evaluated all feasible mitigation that could avoid or lessen the potentially significant impact associated with the conversion of Agricultural Land to a non-agricultural use. For the reasons noted below, **MM GP AG-1** could reduce or lessen the potentially significant impact; however, it would not fully mitigate to a less than significant level. Therefore, the proposed General Plan would result in a significant and unavoidable impact.

Avoidance

Most of the approximately 2,000 acres of Prime Farmland, Farmland of Statewide Importance, and Unique Farmlands (referred to as Agricultural Land) is currently surrounded by vacant land however, these lands have the potential to be developed due to their General Plan land use designations (General Industrial, Estate Residential, Public/Quasi-Public, etc.). The adjacency of future sensitive receptors makes many agricultural uses more difficult. Factors such as noise, dust, odor, vibration, and the use of insecticides/ pesticides are made more complex by the adjacency of people. Thus, as outlined in **MM GP AG-1**, future urban development, and in particular housing, should first seek to avoid developing on existing Agricultural Land or near existing agricultural uses. While the proposed General Plan is intended to result in a compact urban form, annexation has the potential to convert Agricultural Land to non-agricultural usage as avoidance cannot be guaranteed and it is likely that some Agricultural Land would be converted to non-agricultural uses over the length of the proposed General Plan. Therefore, while avoidance could reduce potential impacts associated with conversion if development does not occur on Agricultural Lands, it would not avoid all Agricultural Land. Therefore, avoidance would not reduce all potentially significant impacts to a less than significant level.

LESA Model

As outlined in **MM GP AG-1**, at the time of development applications, the LESA model (or future version of the model) can be prepared to determine whether the conversion of lands classified as Agricultural

Land is significant from an agricultural production perspective. If the LESA model run demonstrates that the development would not be considered significant, as outlined below, the future development would not result in a significant impact associated with conversion of Agricultural Land to a non-agricultural use.

- Total Score 0 to 39 Points; Not Considered Significant
- Total Score 40 to 59 Points; Considered Significant only if LE and SA subscores are each greater than or equal to 20 points
- Total Score 60 to 79 Points; Considered Significant unless either LE or SA subscore is less than 20 points
- Total Score 80 to 100 Points; Considered Significant

However, if the LESA Model Score demonstrates that conversion of Agricultural Land to a non-agricultural use would be considered significant, a potentially significant impact could occur.

Agricultural Easement

While an agricultural easement over existing agricultural uses or land could reduce potential impacts associated with conversion, purchase of an easement that protects an existing resource is a less desirable form of mitigation because it is not a replacement of the affected resource, only a means of reducing further loss of the resource in the future.

Additionally, under this method, an easement is purchased that covers land that is already farmed and that would preclude future urban development in perpetuity. For some cities, this method is an effective means of providing a greenbelt or buffer between the built environment and agricultural use, preventing future conversion of agricultural land to urban uses. However, there is no greenbelt or adjacent agricultural land to protect the approximately 2,000 acres of Agricultural Land as the surrounding lands are proposed for development due to their designations. An agricultural easement would prevent future conversion of Agricultural Land but does not address the actual loss of the farmland resource. Given the region's desert climate and landscape, there is no other agricultural land in the surrounding area, so any form of easement would need to be outside of the surrounding area and ideally within the County.

While the City is not aware of any existing easement or bank that could be used to offset the conversion of Agricultural Land, one could be created and utilized. The amount of Agricultural Land represents approximately 1.5 percent of the proposed General Plan area (see **Table 5.2-4: Agricultural Resources in the City and SOI – Proposed General Plan**). At this relatively low percentage of the total area, and lack of urban growth in the unincorporated SOI, development of a mitigation bank or similar agricultural land easement is unlikely.

The easement approach assumes that there is agricultural land nearby with owners willing to accept an easement, and a conservation district or agency willing to accept the easement. The City and SOI are within the Mojave Desert Resource Conservation District boundaries; while the Mojave Desert Resource Conservation District indicates that they are engaged in providing mitigation and easements for developers, they do not specify if agricultural easement services are offered. While this can change over time, to provide a conservative analysis, this EIR assumes there are no existing agricultural easement

programs in or adjacent to the City and unincorporated SOI. Therefore, while an agricultural easement or participation in a mitigation bank is feasible mitigation and required as outlined in **MM GP AG-1**, due to no known existing easements or banks in the City there is the potential impacts would not be mitigated and as such result in a significant and unavoidable impact.

Creation of New Agricultural Land

Another method would be to convert land that is not currently agricultural land into an agricultural use such as through the addition of irrigation. Given the City's desert climate, the cost of pumping water, and limitations on the types of crops that can withstand the heat, this method is more expensive than other types of agriculture and would likely be limited to only high value crops.

While cannabis is a crop that can be grown in the City, cultivation must occur indoors per Section 19.27.060 of the municipal code, Types of Commercial Cannabis Activity Permitted, of the Barstow Code, and is therefore considered an industrial use by the City. In this context, the construction of buildings to allow the cultivation of cannabis results in the loss of farmland. Even with the implementation of Policy OSC-2.4, which allows for indoor agriculture provided it is appropriately buffered, there is no guarantee that buildings on farmland would continue to be used for indoor agricultural purposes in perpetuity.

Therefore, despite **MM GP AG-1** including avoidance, LESA, agricultural easement, and/or creation of new agricultural land, impacts would remain significant. Overall, even with adherence to MM GP AG-1, implementation of the proposed General Plan would result in a significant and unavoidable impact regarding the conversion of Important Farmland to non-agricultural use.

Impact 5.2-1: General Plan: Level of Significance Before Mitigation: Potentially Significant Impact.

Mitigation Measures

MM GP AG-1 Prior approval of any development permit on land considered Prime Farmland, Farmland of Statewide Importance, and Unique Farmlands, the City shall require the following:

1. Future development shall first seek to avoid developing on land classified as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland.
2. Completion of the California Department of Conservation Land Evaluation & Site Assessment Model. If the model score is 39 points or less, conversion of the land is not significant, and no further mitigation is required. If the model score is between 40 and 79 points, conversion of the land to urban uses may be significant but will depend on the results of the model. A LESA model score of 80 or greater identifies the conversion as significant.
3. If the LESA model results determine that conversion of the agricultural land to urban uses is a significant impact, the development shall be conditioned to provide either an agricultural easement on existing farmland with a similar or greater LESA model score, or the creation of new agricultural land and easement at a 1:1 ratio.

Impact 5.2-1: General Plan: Level of Significance After Mitigation: Significant and Unavoidable Impact.

Barstow International Gateway

Construction and Operations

Agricultural Land within the BIG footprint is indicated in **Table 5.2-5: Important Farmland Categories – BIG** and depicted in **Figure 5.2-3: Important Farmland Categories – BIG .** There is approximately 313 acres of Agricultural Land at Sites A and B within the BIG footprint. Sites A and B are also depicted in **Figure 5.2-4: Important Farmland Categories Site A – BIG** and **Figure 5.2-5: Important Farmland Categories Site B – BIG**, respectively, and described in detail in the *Environmental Setting* Section above. BIG's potential impacts to the 313 acres of Agricultural Land within the BIG footprint are discussed below. BIG's potential impacts to the 237 acres of Agricultural Land within BIG's ZOI but outside the BIG footprint (i.e., Sites 1, 2, and 3) are addressed in **Impact 5.2-5**. Site A consists of small-scale livestock, crops, grazing areas with one associated single-family residential dwelling unit, and the BNSF right-of-way consisting of earthen berms, which support existing tracks and a drainage ditch. Based on review of aerial photographs, the BNSF right-of-way portion of Site A has been continuously used as railroad right-of-way since at least 1953 (Environmental Data Resources, 2022). Site A contains approximately 21 acres of Agricultural Land (Farmland of Statewide and Local Importance categories), including approximately 6 acres within the BIG off-site improvements area, which would remain in the County and not be annexed, and approximately 15 acres within BIG's ZOI, but outside the BIG footprint; see **Table 5.2-5: Important Farmland Categories – BIG**. As noted above, the 6 acres of Agricultural Land within the BNSF right-of-way consist of earthen berms supporting existing tracks and a drainage ditch. In this area, BIG proposes to expand the existing BNSF corridor (i.e., the west lead track) to accommodate off-site rail improvements. Although the existing BNSF right-of-way would almost certainly never be used for agricultural purposes, these areas are designated as Agricultural Land since FMMP's Important Farmland category boundaries are not based on parcel boundaries or land uses and are instead based on soil type. Therefore, BIG would convert approximately 6 acres of Site A's existing Agricultural Land to a non-agricultural use.

Site B consists of alfalfa croplands, which have been continuously used as farmland since the 1950s, and three single-family residential dwelling units. Site B contains approximately 307 acres of Agricultural Land (Prime Farmland and Farmland of Statewide Importance categories); see **Table 5.2-5: Important Farmland Categories – BIG**.

To determine the potential significance of BIG's conversion of Agricultural Land within Sites A and B to non-agricultural use, a LESA was completed; see **Appendix 5.2 BIG-1**. As previously mentioned in **Section 5.2-2: Regulatory Setting**, PRC § 21095 and State CEQA Guidelines Appendix G identify the LESA methodology as an optional method that agencies may use in assessing whether impacts to agricultural resources are significant environmental effects. As determined in **Appendix 5.2 BIG-1,** BIG had an overall Final LESA score of 44.9 points, with a Land Evaluation subtotal score of 16 points and a Site Assessment subtotal score of 28.9 points. As noted above in **Table 5.2-3: LESA Model Significance Determination – BIG**, a project with a LESA score between 40 to 59 points is considered significant if both the LESA subtotals are each greater than or equal to 20 points. Because BIG's Land Evaluation subtotal score was less than

20 points (i.e., it totaled only 16 points), BIG's conversion of Agricultural Land to a non-agricultural use would result in a less than significant impact, and no mitigation is required.

Impact 5.2-1: BIG: Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.2-1: BIG Mitigation Measures: No mitigation required.

Impact 5.2-1: BIG Level of Significance After Mitigation: No impact would occur.

Impact 5.2-2	***Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

Proposed General Plan

There are no Williamson Act contracts within the City limits; however, there are several Williamson Act contracts in the City's SOI; see **Figure 5.2-2: Agricultural Resources in the City and SOI – Proposed General Plan** (Department of Conservation, 2023). The proposed General Plan area does not include any active Williamson Act contacts that would be annexed into the City; therefore, no conflict would occur and impacts would be less than significant.

There is no existing zoning for agricultural use within the City. All existing zoning for agricultural use within the proposed General Plan area (approximately 608 acres) is within the City's unincorporated SOI area (within BIG's footprint); see **Table 5.2-6: Existing Zoning for Agricultural Use – BIG**. Of the approximately 608 acres within BIG's footprint, approximately 598 acres are within the BIG Specific Plan area (i.e., proposed for annexation under SBLAFCO Action A), and the remaining 10 acres are within BIG's off-site improvements area that would not be annexed into the City. Impacts associated with the BIG's off-site improvements are analyzed below under the BIG analysis.

The proposed General Plan includes annexation to the City of approximately 2,785 acres under SBLAFCO Actions A and B. SBLAFCO Action A includes annexation of 2,686 acres (an approximately 2,676-acre portion of the BIG Specific Plan area and an approximately 10 acre parcel to prevent the creation of an unincorporated island). SBLAFCO Action B includes annexation of 99 acres to prevent the creation of an unincorporated island. The City would prezone these 2,785 acres in preparation for annexation. As noted in **Table 3-7: Zoning Comparison for Annexation Areas**, there are a total of 598 acres of land zoned for agriculture use- and proposed for annexation, all within SBLAFCO Action A. There is no land zoned for agricultural use within SBLAFCO Action B. SBLAFCO Action A contains 20 acres of AG, 80 acres of AG-20, 110 acres of AG-AP, 213 acres of RL-10-AP, 23 acres of FW, and 141 acres of FW-AP, which would be annexed and designated as Industrial in the proposed General Plan and prezoned BIG Specific Plan. While the proposed General Plan is intended to result in a compact urban form, the proposed uses would conflict with the existing County zoning for agricultural use and annexation would result in conversion to a non-agricultural use. Similar to the reasoning provided in **Impact 5.2-1: General Plan**, due to limited existing agricultural resources in the City and surrounding area, including agricultural easement programs, there are no feasible mitigation measures that could be applied to fully address the actual loss of the agricultural

resource. Therefore, the proposed General Plan would conflict with existing zoning for agricultural use and result in a significant and unavoidable impact.

Impact 5.2-2: General Plan: Level of Significance Before Mitigation: Potentially Significant Impact.

Impact 5.2-2: General Plan: Mitigation Measures: No feasible mitigation.

Impact 5.2-2: General Plan: Level of Significance After Mitigation: Significant and Unavoidable Impact.

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Construction and Operations

The existing zoning for agricultural use within BIG's footprint totals approximately 608 acres, all of which are currently in the County; see **Table 5.2-6: Existing Zoning for Agricultural Use – BIG**.

County Zoning for Agricultural Use. Of the approximately 608 acres of existing County zoning for agricultural use within BIG's footprint, approximately 598 acres are within the BIG Specific Plan area proposed for annexation under SBLAFCO Action A (see **Impact 5.2-2: General Plan** discussion above), and approximately 10 acres would remain in the County (i.e., BIG off-site improvements area). County zoning for agricultural use would not apply to the 598-acre portion of BIG's footprint, which would be annexed to the City and therefore subject to Barstow Code and the proposed BIG Specific Plan zoning regulations; see **Section 5.0** for further discussion concerning the applicability of County Code standards to BIG. Impacts associated with zoning for agricultural use within the annexation areas are addressed above in **Impact 5.2-2: General Plan.** The 598-acre annexation area under SBLAFCO Action A would be rezoned from County zoning for agricultural use (i.e., AG, AG-20, AG-AP, RL-10-AP, FW, and FW-AP Districts) to BIG Specific Plan as a part of the proposed General Plan.

Approximately 10 acres of BIG's off-site improvements are within County zoning for agricultural use (i.e., AG and FW Districts). This area, which is proposed for the Hinkley Road Bridge improvements, would remain within County zoning for agricultural use. As discussed in **Section 5.11: Land Use and Planning**, these non-rail improvements would be conditionally permitted uses in their respective County zoning districts, thus, would not conflict with existing County zoning for agricultural use. In summary, BIG's proposed off-site improvements would not conflict with existing County zoning for agricultural use and a less than significant impact would occur.

Williamson Act Contracts. As discussed in **Section 5.2.4: Environmental Setting**, there are no lands under a Williamson Act contract within the BIG footprint or BIG off-site improvements area, therefore no impact would occur, and no mitigation is required.

Impact 5.2-2: BIG: Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.2-2: BIG Mitigation Measures: No mitigation required.

Impact 5.2-2: BIG Level of Significance After Mitigation: No impact would occur.

Impact 5.2-3	***Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?***

Proposed General Plan

According to the CDFW, the proposed General Plan area does not contain public forestlands or private timberlands, nor are there lands in the proposed General Plan area that are zoned for forestland or timberland uses or production (CDFW, 2023). Therefore, implementation of the proposed General Plan would not conflict with the existing zoning for, or cause rezoning of forestlands or timberlands. As such, no impact would occur.

Impact 5.2-3: General Plan: Level of Significance Before Mitigation: No Impact.

Impact 5.2-3: General Plan: Mitigation Measures: No mitigation required.

Impact 5.2-3: General Plan: Level of Significance After Mitigation: No impact would occur.

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No forest land (as defined in PRC § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned "Timberland Production" (as defined by Government Code § 51104(g)) exists on or near the BIG footprint (see **Figure 5.2-9: Existing Zoning for Agricultural Use – BIG**). As discussed in **Section 5.2.4: Environmental Setting,** neither the County Code nor the Barstow Code not include any zoning for forest or timberland use. Therefore, BIG would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned "Timberland Production." No impact would occur, and no mitigation is required.

Impact 5.2-3: BIG: Level of Significance Before Mitigation: No Impact.

Impact 5.2-3: BIG Mitigation Measures: No mitigation required.

Impact 5.2-3: BIG Level of Significance After Mitigation: No impact would occur.

Impact 5.2-4	***Would the Project result in the loss of forest land or conversion of forest land to non-forest use?***

Proposed General Plan

According to the CDFW, the proposed General Plan area does not contain public forestlands or private timberlands, nor are there lands in the proposed General Plan area that are zoned for forestland or

timberland uses (CDFW, 2023). Therefore, implementation of the proposed General Plan would not result in the loss or conversion of forest lands to non-forest uses. As such, no impact would occur.

Impact 5.2-4: General Plan: Level of Significance Before Mitigation: No Impact.

Impact 5.2-4: General Plan: Mitigation Measures: No mitigation required.

Impact 5.2-4: General Plan: Level of Significance After Mitigation: No impact would occur.

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Construction and Operations

No forest lands exist on or near the BIG footprint. Therefore, BIG would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur, and no mitigation is required.

Impact 5.2-4: BIG: Level of Significance Before Mitigation: No Impact.

Impact 5.2-4: BIG Mitigation Measures: No mitigation required.

Impact 5.2-4: BIG Level of Significance After Mitigation: No impact would occur.

Impact 5.2-5	***Would the Project involve other changes in the existing environment that, due to their location or nature, could result in conversion of [Important] Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

Proposed General Plan

As shown in **Figure 3-9: 2015 General Plan Land Use Plan**, **Figure 3-11: San Bernardino Countywide Plan Land Use Designations (Unincorporated Sphere of Influence)**, and **Figure 3-13: Proposed General Plan Land Use Plan,** only lands that would be annexed under SBLAFCO Actions A and B would have a new land use designation under the proposed General Plan. These lands would be prezoned for annexation. All other lands within the City's unincorporated SOI would retain their existing County land use designations and zoning. Because these lands are not directly adjacent to the City's unincorporated SOI, the conversion of Agricultural Land under SBLAFCO Action A to non-agricultural use would not result in similar conversion of Agricultural Land within the City's unincorporated SOI. Agricultural Land within the City's unincorporated SOI is not adjacent to the City limits. Therefore, development within the City would not result in the conversion of these lands to non-agricultural use.

According to CDFW, the proposed General Plan area does not contain public forestlands or private timberlands, nor are there lands in the proposed General Plan area that are zoned for forestland or timberland uses (CDFW, 2023). Therefore, implementation of the proposed General Plan would not conflict with the zoning of forestlands or timberlands, nor would it result in the loss or conversion of forestlands to non-forest uses. As such, a less than significant impact would occur.

Impact 5.2-5: General Plan: Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.2-5: General Plan: Mitigation Measures: No mitigation required.

Impact 5.2-5: General Plan: Level of Significance After Mitigation: Less than Significant Impact.

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There are no forest lands within or adjacent to the BIG study area. Therefore, BIG construction activities would not involve changes in the existing environment that, due to their location or nature, could result in conversion of forest land to non-forest use. No impact would occur in this regard and no mitigation is required.

As discussed in Section 5.2.3.1, the study area for BIG's indirect impacts to Agricultural Land is BIG's ZOI. **Figure 5.2-3: Important Farmland Categories – BIG** depicts the locations of and **Table 5.2-5: Important Farmland Categories – BIG** provides the acreage of Agricultural Land and their Important Farmland categories within the BIG ZOI. BIG's potential impacts to the 237 acres of Agricultural Land within BIG's ZOI but outside the BIG footprint (i.e., Sites 1, 2, and 3) are discussed below. Site 1, which is approximately 0.5 mile north of the proposed transload warehouse center are and near Lenwood Road, contains approximately 180 total acres of Agricultural Land (Prime Farmland); see **Figure 5.2-6: Important Farmland Categories Site 1 – BIG.** Site 2, which is approximately 0.5 miles west of the proposed transload warehouse center area along Hinkley Road, contains approximately 42 acres of Agricultural Land (Farmland of Statewide Importance and Unique Farmland); see **Figure 5.2-7: Important Farmland Categories Site 2 – BIG**. Site 3, which is approximately 1.5 miles north of the proposed west lead track extension area along Indian Trail, contains approximately 15 acres of Agricultural Land (Prime Farmland and Farmland of Statewide Importance); see **Figure 5.2-8: Important Farmland Categories Site 3 – BIG.**

Given BIG's proximity to these existing Agricultural Lands, BIG could potentially involve changes in the existing environment that, due to their location or nature, could result in conversion of these existing Agricultural Lands to non-agricultural use. Direct changes in the existing environment that, due to their location or nature, could result in conversion of Agricultural Land to non-agricultural use include development of land uses other than agricultural uses. Indirect changes to the existing environment, which could result in the conversion of farmland to non-agricultural use, are those that might occur through temporary construction impacts, such as utility disruption or temporary loss of access, or land use incompatibilities from operations, such as increased noise.

Construction

BIG construction would not directly convert these areas to a non-agricultural use, as there are no BIG improvements proposed on these properties. However, indirect impacts to these farmlands could occur during BIG construction activities.

Site 1. Utility disruption and loss of access could occur during BIG construction. Potential impacts could occur along Lenwood Road and at the intersection of Lenwood Road at Jasper Road, where a transload warehouse center entrance would be constructed, and along Main Street where utilities would be

relocated. Construction noise and traffic would occur along Main Street and Lenwood Road, as discussed in **Section 5.12: Noise and Vibration** and **Section 5.15: Transportation**. Disruptions during BIG construction would be temporary, localized, and would occur on or adjacent to the BIG footprint. Construction-related impacts from utility relocations and stormwater improvements, such as dust, noise, soil erosion, and access interruptions, are evaluated in **Section 5.1** through **Section 5.17**. Due to the distance from BIG, BIG's construction-related environmental impacts at the nearest off-site Agricultural Land would be less than significant following compliance with the established regulatory framework and would not indirectly convert these areas to a non-agricultural use.

Site 2. Utility disruption and loss of access could occur during BIG construction. Potential impacts could occur at the Hinkley Road bridge where Hinkley Road crosses the Mojave River, and where bridge reconstruction would take place. Construction noise and traffic would occur at the location of the existing bridge, as discussed in **Section 5.12: Noise and Vibration** and **Section 5.15: Transportation**. Disruptions during BIG construction would be temporary, localized, and would occur on/adjacent to the BIG footprint. Construction-related impacts from bridge construction, utility relocations, and stormwater improvements, such as dust, noise, soil erosion, and access interruptions, are evaluated in **Section 5.1** through **Section 5.17**. Due to the distance from BIG, BIG's construction-related environmental effects at the nearest off-site Agricultural Land would be less than significant following compliance with the established regulatory framework and would not indirectly convert these areas to a non-agricultural use.

Site 3. Temporary loss of access could occur during BIG construction. Potential impacts would occur during the west lead track expansions within the existing BNSF right of way at Indian Trail, as discussed in **Section 5.15: Transportation**. Disruptions during BIG construction would be temporary, localized, and would occur on/adjacent to the BIG footprint. Construction-related impacts from bridge construction, utility relocations, and stormwater improvements, such as dust, noise, soil erosion, and access interruptions, are evaluated in **Section 5.1** through **Section 5.17**. Due to the distance from BIG, BIG's construction-related environmental effects at the nearest off-site Agricultural Land would be less than significant following compliance with the established regulatory framework and would not indirectly convert these areas to a non-agricultural use.

In summary, BIG construction activities would not involve other changes to the environment, which would directly or indirectly result in the conversion of Agricultural Land within Sites 1, 2, and 3 to a non-agricultural use. A less than significant impact would occur, and no mitigation is required.

Operations

BIG operations would not directly convert these areas to a non-agricultural use, as there are no BIG improvements proposed on these properties. However, indirect impacts to these farmlands could occur during BIG operational activities.

BIG could potentially indirectly impact Sites 1 and 2, which are nearest BIG operations (approximately 0.5 mile north of the proposed transload warehouse center). Potential disruptions during BIG operations (e.g., noise) would be attenuated and/or buffered due to distance, intervening structures, and railroad noise associated with the existing BNSF mainline that already occurs in the area; see **Section 5.12: Noise and Vibration** for more information. Given the substantial distance buffering of approximately 0.5-mile, other

indirect impacts such as dust and air quality would not result in impacts to this Agricultural Land. Therefore, BIG operations would not involve other changes to the environment, which would result in conversion of Agricultural Land on Sites 1, 2, and 3 to non-agricultural use. A less than significant impact would occur, and no mitigation is required.

Impact 5.2-5: BIG: Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.2-5: BIG Mitigation Measures: No mitigation required.

Impact 5.2-5: BIG Level of Significance After Mitigation: Less than Significant Impact.

5.2.7 SIGNIFICANT UNAVOIDABLE IMPACTS

Proposed General Plan

The proposed General Plan would result in a significant and unavoidable impact concerning the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (important farmland) to non-agricultural use. While **MM GP AG-1** could reduce impacts, it would not eliminate the direct loss of important farmlands associated with the implementation of the proposed General Plan, and the associated loss of agricultural production under **Impact 5.2-1: General Plan** would be significant and unavoidable.

The proposed General Plan would result in a significant unavoidable impact concerning conflicts with existing zoning for agricultural use; the annexation under SBLAFCO Action A would convert existing County zoning for agricultural use to BIG Specific Plan. As discussed under **Impact 5.2-2: General Plan**, there is no feasible mitigation that would address the loss of the agricultural resource and therefore would result in a significant and unavoidable impact.

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No significant unavoidable impacts concerning agriculture and forestry resources would occur as a result of BIG.

5.2.8 REFERENCES

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