

**Appendix A:
Farmlands Study for the County Road 66B Bridge Replacement Project**

December 12, 2018

Caltrans District 3 – North Region Local Assistance
ATTN: Chris Carrol Associate Environmental Planner
703 B Street
Marysville, CA 95901

RE: Farmlands Study for the County Road 66B Bridge Replacement Project, Glenn County

Mr. Carrol;

Gallaway Enterprises has reviewed the County Road 66B Bridge Replacement Project (Project) to determine if there is potential for impact to adjacent agricultural lands from the Project's proposed construction activity. Specifically, this study focused on farmland of prime, unique, and local importance within the proposed project.

The purpose of the Project is to replace the existing, structurally deficient bridge over the Colusa Drain with a new wider structure. The Project site is located approximately 2 miles west of State Route 45 near the town of Princeton, Colusa County. County Road 66B is bordered by rice fields and crosses the Colusa Drain at the Project location. Reclamation District 2047 constructed the Colusa Drain in 1919 originally to serve as a bypass. In addition to agricultural water, the drain now conveys both summer and winter flows to the Knights Landing outfall gates on the Sacramento River in Yolo County. County Road 66B at the Project location is straight and provides access to residences, farm support shops, and rice fields. The Project will result in permanent and temporary impacts to farmland. The following are the justifications for the evaluations in Part VI of the AD1006 form wherein a larger numeric score reflects a higher potential impact to farmland resources.

Evaluation 1: How much land is in nonurban use within a radius of 1.0 mile from where the project is intended?

The bridge is located in rural agricultural/residential setting. More than 95 percent of the land surrounding the Project site is considered nonurban; therefore, it is valued at the maximum of 15 points.

Evaluation 2: How much of the perimeter of the site borders on land in nonurban use?

Nearly the entire Project perimeter borders land used for farming rice therefore it is valued at the maximum of 10 points.

Evaluation 3: How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than 5 of the last 10 years?

Approximately 50 percent of farmland within the site has been farmed more than 5 of the last 10 years; therefore, this criterion is rated at a 10 out of a possible 20.

Evaluation 4: Is the site subject to State or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

The parcels north of the bridge (APNs 013-210-023, 013-210-034, and 013-210-035) which will be affected by construction activities is, according to the most recent 2015-2016 mapping, enrolled under a Williamson Act contract and is classified as prime farmland. In addition, all of the land surrounding the Project is designated as agricultural in the County's General Plan land use map and are subject to the County's agricultural preservation of Goal NRG-1: To preserve and maintain a viable and diverse agricultural industry within Glenn County. The maximum of 20 points is given for this criterion.

Evaluation 5: How close is the site to an urban built-up area?

The site is approximately 2.7 miles from the community of Princeton which is considered as urban built-up because of the presence of housing, commercial buildings, and other services. The maximum of 15 points is added to this evaluation.

Evaluation 6: How close is the site to water lines, sewer lines and/or other local facilities and services whose capacities and design would promote nonagricultural use?

Local facilities and services exist more than 1 but less than 3 miles from the site; therefore, this criterion is rated as 10 out of a possible 15.

Evaluation 7: Is the farm unit(s) containing the site (before the project) as large as the average-size farming unit in the county?

According to the 2012 Census of Agriculture, Acreage of Farm Units in Operation for Glenn County, California the average size of a farm is 510 acres. The surrounding parcels range from 38.6 acres to 101.4 acres in size. The largest parcel, 101.4, is 19% of 510, therefore the farm units within the Project site are below average by at least 81%. Deducting 1 point for each 5 percent below the average results in a reduction of 10 points from a total of 10, therefore this criterion is rated at a 0 out of a possible 10.

Evaluation 8: If this site is chosen for the project, how much of the remaining land on the farm will become nonfarmable because of interference with land patterns?

The proposed Project will permanently convert 0.04 acres and temporarily convert 0.14 acres of farmland; however the remaining farmland will not be affected, and therefore will not become non-farmable because of interference with land patterns. As a result, this criterion is rated at 0 out of 10 because less than 5 percent of the acres will be directly converted by the Project.

Evaluation 9: Does the site have available adequate supply of farm support services and markets, i.e., farm suppliers, equipment dealers, processing and storage facilities and farmer's markets?

This topic is somewhat subjective and difficult to quantify, however it is assumed that the site has an adequate supply of farm support services and markets, therefore this criterion is rated at a 5 out of a possible 5.

Evaluation 10: Does the site have substantial and well-maintained on-farm investments such as barns, other storage buildings, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?

This topic is somewhat subjective and difficult to quantify, however the parcels appear to contain substantial and well-maintained on-farm investments in what would be considered to be a moderate amount of on-farm investment. There is no recommended method of determining the final rating for moderate on-farm investments, only the allowance to assign between 19 to 1 point(s). Conservatively, this criterion is rated at a 15 out of 20 possible points.

Evaluation 11: Would the project at this site, by converting farmland to nonagricultural use, reduce the demand for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?

The proposed Project would not reduce the demand for farm support services so as to jeopardize the continued existence of these support services and the viability of the farms remaining in the area. This criterion is rated at a 0 out of a possible 10.

Evaluation 12: Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of surrounding farmland to nonagricultural uses?

The proposed Project involves the replacement of a structurally deficient bridge on the existing alignment and is not considered to be an incompatible use that would lead to the eventual conversion of surrounding farmland to nonagricultural use. This criterion is rated at a 0 out of a possible 10.

Please find attached a U.S. Department of Agriculture Form AD-1006 that shows this Project earning a score of 100 Assessment Points in Part VI. When the scores in Part VI exceed 60 points the Caltrans District Environmental Branch submits the appropriate forms to NRCS. Part IV "Land Evaluation Information" must be completed by NRCS prior to determining the final score. Final scores should be evaluated under the guidelines of §7 CFR 658.4. Projects with a score of less than 160 (Site Assessment Criteria and Land Evaluation Information combined) need not be given further consideration for protection and no additional sites need to be evaluated.

The total amount of acres converted (taken out of production) is 0.04 acres. According to the most recently available data from the Farmland Mapping and Monitoring Program (FMMP) in 2016 there was 293,310 acres of Important Farmland in Glenn County (Prime Farmland, Farmland of Statewide Importance, Unique Farmland and Farmland of Local Importance). The permanent impacts as a result of the proposed Project represent a loss of 0.00000013% of the total Important Farmland in the County. Due to the minor amount of land converted and the lack of public interest, this is considered a less than significant impact.

The area is designated for agricultural land use and the Project would not increase the chances to increase urbanization of the area. In addition, neither NEPA nor the Farmland Protection Policy Act (FPPA) requires a project to be modified solely to avoid or minimize the effects of conversion of farmland to non-agricultural uses.

Parcel Number 013-210-034 is enrolled under the Williamson Act and will be temporarily (0.14 acres) and permanently (0.04 acres) impacted by the Project. Since the land to be acquired permanently for right-of-way is minimal there will be no effect on the eligibility for the Williamson Act program. Therefore, there will be no adverse effects to the farmland.

Regards,



Kevin Sevier
Vice President
kevin@gallawayenterprises.com

Enclosed: Attachment A: Form AD-1006
Attachment B: Farmland Conversion Map

Attachment A: Form AD-1006

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request			
Name of Project		Federal Agency Involved			
Proposed Land Use		County and State			
PART II (To be completed by NRCS)		Date Request Received By NRCS		Person Completing Form:	
Does the site contain Prime, Unique, Statewide or Local Important Farmland? <i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>		YES <input type="checkbox"/>	NO <input type="checkbox"/>	Acres Irrigated	Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %		Amount of Farmland As Defined in FPPA Acres: %		
Name of Land Evaluation System Used	Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS		
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly					
B. Total Acres To Be Converted Indirectly					
C. Total Acres In Site					
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland					
B. Total Acres Statewide Important or Local Important Farmland					
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted					
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value					
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)					
PART VI (To be completed by Federal Agency) Site Assessment Criteria <i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i>		Maximum Points	Site A	Site B	Site C
1. Area In Non-urban Use		(15)			
2. Perimeter In Non-urban Use		(10)			
3. Percent Of Site Being Farmed		(20)			
4. Protection Provided By State and Local Government		(20)			
5. Distance From Urban Built-up Area		(15)			
6. Distance To Urban Support Services		(15)			
7. Size Of Present Farm Unit Compared To Average		(10)			
8. Creation Of Non-farmable Farmland		(10)			
9. Availability Of Farm Support Services		(5)			
10. On-Farm Investments		(20)			
11. Effects Of Conversion On Farm Support Services		(10)			
12. Compatibility With Existing Agricultural Use		(10)			
TOTAL SITE ASSESSMENT POINTS		160			
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100			
Total Site Assessment (From Part VI above or local site assessment)		160			
TOTAL POINTS (Total of above 2 lines)		260			
Site Selected:		Date Of Selection		Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>	
Reason For Selection:					
Name of Federal agency representative completing this form:					Date:

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

- Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, <http://fppa.nrcs.usda.gov/lesa/>.
- Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s) of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map, or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)
- Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.
- Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.
- Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.
- Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.
- Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

(For Federal Agency)

Part I: When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

Part VI: Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.
2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.

Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \times 160 = 144 \text{ points for Site A}$$

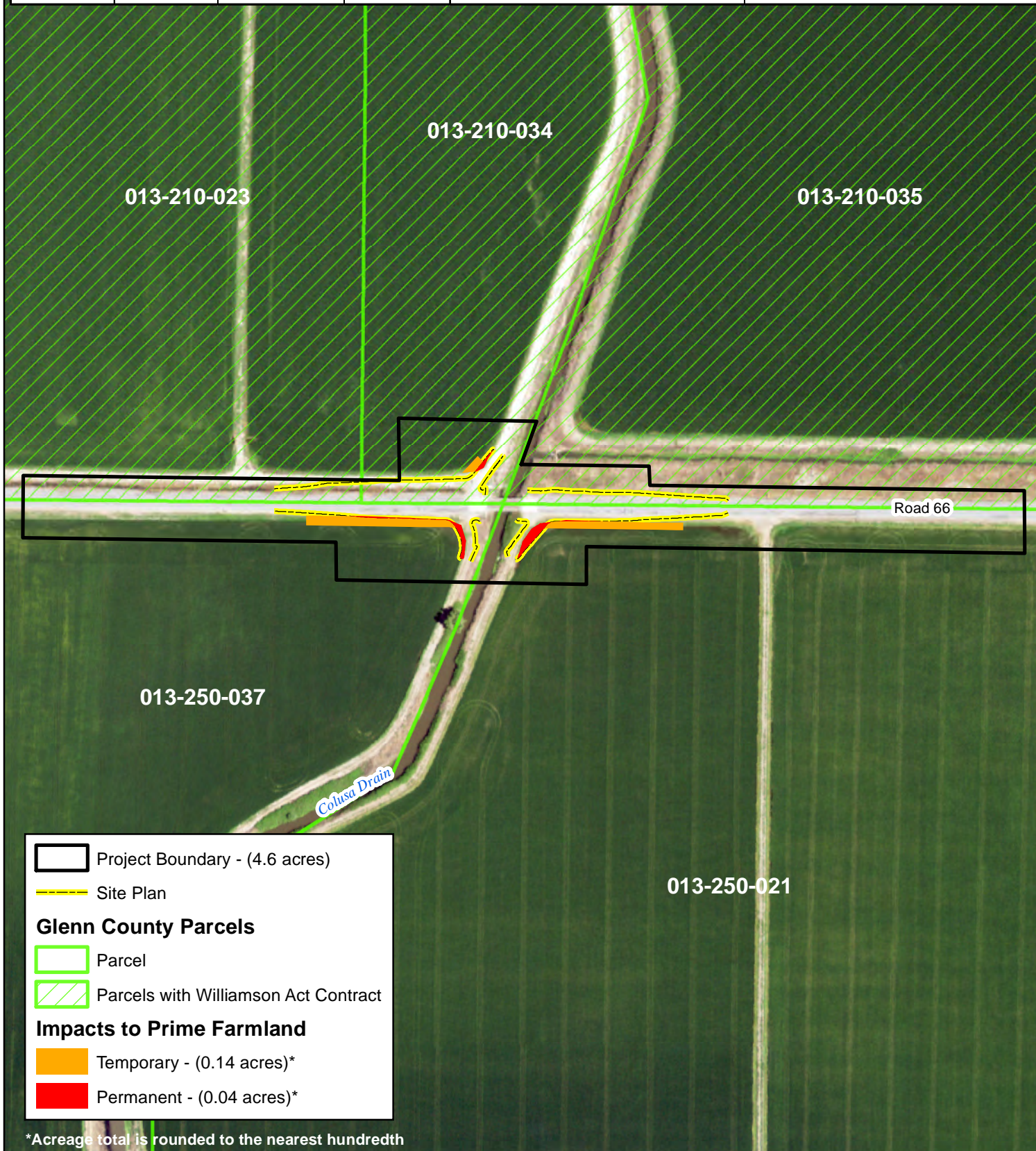
For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

Attachment B: Farmland Conversion Map

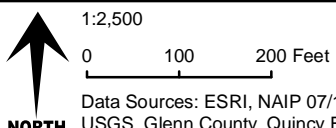
Farmland Conversion Table

APN	Williamson Act	FMMP Designation	Parcel Acreage	Permanent Impacts to Prime FMMP Acreage	Temporary Impacts to Prime FMMP Acreage
013-210-023	Ongoing	Prime Farmland	40.6	0.000	0.000
013-210-034	Ongoing	Prime Farmland	65.4	0.004	0.008
013-210-035	Ongoing	Prime Farmland	101.4	0.000	0.000
013-250-037	None	Prime Farmland	40.6	0.015	0.071
013-250-021	None	Prime Farmland	38.6	0.018	0.058



Project Boundary - (4.6 acres)
 Site Plan
Glenn County Parcels
 Parcel
 Parcels with Williamson Act Contract
Impacts to Prime Farmland
 Temporary - (0.14 acres)*
 Permanent - (0.04 acres)*

*Acreage total is rounded to the nearest hundredth



County of Glenn CR 66B Bridge 11C-0068
Farmland Conversion



Data Sources: ESRI, NAIP 07/11/2016, FMMP, USGS, Glenn County, Quincy Engineering

GE: #16-078 Map Date: 12/11/18