

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

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Subject: **Land Evaluation and Site Assessment for the Newland Simpson Road Project**

1. Executive Finding

EPD Solutions Inc., (EPD) evaluated the agricultural value of the property proposed for development of the Newland Simpson Road Project (Project). The analysis is based on the California Agricultural Land Evaluation and Site Assessment (LESA) model and concludes that the conversion of the Project site's agricultural land to warehouse uses would result in a significant loss of Farmland.

2. Introduction

According to Public Resources Code (PRC) § 21060.1, "agricultural land" is prime farmland, farmland of statewide importance, or unique farmland, as defined by the U.S. Department of Agriculture land inventory and monitoring criteria. In California, the LESA model is the primary approach for rating the relative quality of agricultural land resources based upon specific measurable features. The LESA model is intended to provide a methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (PRC § 21095). It is also intended to provide lead agencies under the California Environmental Quality Act (CEQA) with a process to determine the significance of converting agricultural properties to urban land uses.

3. Project Overview

Environmental Setting and Location

The Project site is located in the southwest portion of the City of Hemet within Riverside County. The Project site is on the southeast and southwest corners of the intersection of Simpson Road and Warren Road. As shown on Figure 1, *Project Site*, the Project site is comprised of two parcels identified as Riverside County Assessor's Parcel Numbers (APNs) 465-140-043 and 465-140-042.

The site is relatively flat and is utilized for farming activities with no existing structures or improvements, other than irrigation infrastructure. The Project site is currently zoned as Business Park (B-P) and has a General Plan land use designation of Mixed Use (MU). Surrounding land uses consist of vacant and agricultural land uses to the north, south and west, and vacant land and residences to the east. The California Department of Conservation Farmland Mapping and Monitoring Program designates 9.2 acres of the site as Prime Farmland and 63.9 acres of the site as Farmland of Statewide Importance, as shown on Figure 2, *Farmland Locations*.

Project Description for Proposed Project

The proposed Project would develop the 74.88-acre site with two new speculative industrial buildings totaling approximately 1,192,418 SF, with a trailer parking lot, infrastructure improvements and 3.77 acres of adjacent offsite improvements on Simpson and Warren Road.

Project implementation would amend the existing Land Use designation of Mixed Use (MU) to Business Park (BP), consistent with the B-P zoning for the site. The Project would result in the conversion of approximately 73 acres of Important Farmland to non-agricultural use, i.e., the focus of this technical memorandum.

4. California LESA Model Evaluation

The below evaluation mirrors the steps outlined in the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual. The tables below are those provided in Appendix A of the LESA Instruction Manual.

4a. Land Evaluation Factors

The Land Evaluation portion of the LESA Model considers two features that are separately rated:

- **The Land Capability Classification (LCC) Rating:** The LCC indicates the suitability of soils for most kinds of crops. Soils are rated on a scale from Class I to Class VIII. Soils having the fewest limitations receive the highest rating.
- **The Storie Index Rating:** The Storie Index provides a numeric rating (based on a 100-point scale) of the relative degree of suitability or value of a given soil for intensive agriculture use. The rating is based on four soil characteristics: degree of soil profile development, surface texture, slope, and other soil and landscape conditions including drainage, alkalinity, nutrient level, acidity, erosion, and microrelief.

Table A details the LCC and Storie Index rating for the nine soils present on the Project's agriculture site. As shown in Figure 3, *Onsite Soils*, the 73 acres of farmland within the Project area are comprised of approximately 29.7% Domino fine sandy loam, saline-alkali; 7.5 % Domino silt loam, saline-alkali; 23.8% Exeter sandy loam, slightly saline-alkali (0-5% slopes); 9.1% Greenfield sandy loam (0-2% slopes); 0.8% Hanford coarse sandy loam (0-2% slopes); 0.7% Hanford coarse sandy loam (2-8% slopes); 2.1% Pachappa fine sandy loam (0-2% slopes); 5.4% Traver loamy fine sand, saline-alkali, eroded and 20.9% Traver fine sandy loam, saline-alkali.

Table A. Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Type	Project Acres	Portion of Project Area	LCC ¹	LCC Rating ²	LCC Score (C x E)	Storie Index ³	Storie Index Score (C x G)
Domino fine sandy loam, saline-alkali (Dt)	21.7	0.297	IIIs	60	17.82	17	5.049
Domino silt loam, saline-alkali (Dv)	5.5	0.075	IIIs	60	4.5	17	1.275
Exeter sandy loam, slightly saline-alkali (0 to 5 percent slopes) (EoB)	17.4	0.238	IIIs	60	14.28	26	6.188
Greenfield sandy loam (0 to 2 percent slopes) (GyA)	6.6	0.091	I	100	9.1	81	7.371
Hanford coarse sandy loam (0 to 2 percent slopes) (HcA)	0.6	.008	IIs	80	0.64	77	0.616
Hanford coarse sandy loam (2 to 8 percent slopes)(HcC)	0.5	.007	IIe	90	0.63	82	0.574
Pachappa fine sandy loam (0 to 2 percent slopes) (PaA)	1.5	.021	I	100	2.1	85	1.785

Traver loamy fine sand, saline-alkali, eroded (Tr2)	4.0	.054	llls	60	3.24	44	2.376
Traver fine sandy loam, saline-alkali (Ts)	15.3	.21	llls	60	12.6	51	10.71
Total:	73.1	1.0	LCC Total Score:		64.91	Storie Index Total Score:	35.94

1. United States Department of Natural Resources Conservation Service. Agriculture, Custom Soil Resource Report for Western Riverside Area, California. September 19, 2023.
2. California Agricultural Land Evaluation and Site Assessment Model. Table 2. Numeric Conversion of Land Capability Classification Units
3. <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

4b. Site Assessment Factors

The LESA Model includes four Site Assessment factors that are separately rated and are as follow:

- Project Size Rating
- Water Resources Availability Rating
- Surrounding Agricultural Land Rating
- Surrounding Protected Resource Land Rating

Project Size Rating

Project Size Rating recognizes the role that farm size plays in the viability of commercial agricultural operations. In general, larger farming operations can provide greater flexibility in farm management and marketing decisions and tend to have greater impacts upon the local economy through direct employment (California Department of Conservation, 1997).

In terms of agricultural productivity, the size of the farming operation can be considered not just from its total acreage, but the acreage of different quality lands that comprise the operation. Lands with higher quality soils lend themselves to greater diversity in crop selection and the potential for greater economic return per acre unit. The Project Size rating is determined by summing the acres in a project that fall within one of three consolidated LCC categories. The site contains 9.2 acres of LCC Class I-II soils, 44.6 acres of LCC Class III soils, and 19.3 acres of LCC Class IV-VIII soils. Based on LESA Instruction Manual Table 3, which states that the highest score generated across all the columns becomes the overall project size score, a Project Size score of 60 is applicable to the site.

Table B. Project Size Score

	I	J	K
	LCC Class I-II	LCC Class III	LCC Class IV-VIII
Domino fine sandy loam, saline-alkali (Dt)	0	21.7	0
Domino silt loam, saline-alkali (Dv)	0	5.5	0
Exeter sandy loam, slightly saline-alkali (0 to 5 percent slopes) (EoB)	0	17.4	0
Greenfield sandy loam (0 to 2 percent slopes) (GyA)	6.6	0	0
Hanford coarse sandy loam (0 to 2 percent slopes) (HcA)	0.6	0	0

Hanford coarse sandy loam (2 to 8 percent slopes)(HcC)	0.5	0	0
Pachappa fine sandy loam (0 to 2 percent slopes) (PaA)	1.5	0	0
Traver loamy fine sand, saline-alkali, eroded (Tr2)	0	0	4.0
Traver fine sandy loam, saline-alkali (Ts)	0	0	15.3
Total	9.2	44.6	19.3
Project Size Scores	0	60	0
Highest Project Size Score¹		60	

1. Project Size Score was determined from the Project Size Scoring Table from the LESA Instruction Manual (California Department of Conservation 1997)

Water Resources Availability Rating

The Water Resources Availability Rating is based on the water sources that supply the agricultural site and then determining whether different restrictions in supply would take place in years characterized as being periods of drought and non-drought. The agriculture site is irrigated with recycled water purveyed by the Eastern Municipal Water District (EMWD) via waterlines under Simpson Road, located north of the Project site. According to the EMWD Urban Water Management Plan (UWMP), the EMWD estimates that it will have sufficient water supplies to accommodate the planned uses of its service area through 2045 both in historic single-dry years and multiple-dry years. Therefore, during non-drought years, it is unlikely that there would be physical or economic restrictions with water availability at the site. During drought years, while it is unlikely there would be a physical barrier to water access, it is possible that the cost of water could increase and/or restrictions could be set in place for conservation purposes. Consequently, based on the scoring criteria provided in the LESA Manual, Table 5, Water Resource Availability Scoring, the site receives a water resource score of 95 of 100 points (Table C).

Table C. Water Resources Availability

A	B	C	D	E
Project Proportion	Water Source	Proportion of Project Area	Water Availability Score¹	Weighted Availability Score (C X D)
1	Irrigation	1.0	95	95
Total Water Resource Score¹:				95

1. Water Resources Score was determined from the Water Resources Availability Scoring Table from the LESA Instruction Manual (California Department of Conservation 1997)

Surrounding Agricultural Land Rating

The Surrounding Agricultural Land Rating factor evaluates the possibility that surrounding agricultural land use is likely to influence and be influenced by the Project's agricultural land. It identifies the level of agricultural land use within a one-quarter mile radius, zone of influence (ZOI) of the Project site. Parcels that are intersected by the 0.25-mile buffer are included in their entirety. Based upon the percentage of agricultural land in the ZOI, the Project site is assigned a "surrounding agricultural land score." The LESA Model rates the potential significance of the conversion of an agricultural parcel that has a large proportion of surrounding land in agricultural production more highly than one that has a relatively small percentage of surrounding land in agricultural production (California Department of Conservation, 1997).

Figure 5, *Zone of Influence Surrounding Agricultural Land*, shows the area one-quarter mile from the site with areas in agricultural production highlighted: 326.2 acres of Prime Farmland, 253.9 acres of Farmland of Statewide Importance area. As shown, only about 279.5 acres designated as Prime Farmland and Farmland of Statewide Importance are currently in agricultural production. Table D summarizes the findings for the Project's Surrounding Agricultural Land Rating evaluation.

Surrounding Protected Resource Land Rating

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

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

As shown in Figure 4, *Zone of Influence*, there are a total of 746.6 acres within the Project's zone of influence. Of those 746.6 acres, there are currently 302.2 acres of land being used for agricultural production. However, approximately 22.7 acres of the 302.2 acres are not classified as Prime Farmland. As such, the Project's agricultural land zone of influence contains a total of 279.5 acres that are *both* currently being used for agricultural production *and* that are classified as Prime Farmland and Farmland of Statewide Importance, which are located north, northwest, northeast, and west of the Project site.

Further, there are 203.3 acres of total protected resource land in the zone of influence (746.6 acres), 89.4 acres of which are Prime Farmland and Farmland of Statewide Importance. Protected resource land in the zone of influence is comprised of the Salt Creek Channel which falls under the Riverside County Flood Control and Water Conservation District jurisdiction; and Conserved Public Quasi-Public Lands under the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

Based on the Department of Conservation's LESA Instruction Manual, a Project with a percent between 40 and 44 within the zone of influence in agricultural use is given a score of 10. Further, a Project with a percentage between 65 and 69 within the zone of influence that is protected is given a score of 60. Therefore, the Project would have a surrounding agricultural land score of 10 and a surrounding protected resource land score of 60.

Table D. Surrounding Agricultural and Protected Resources Land

A	B	C	D	E	F	G
Zone of Influence					Surrounding Agricultural Land Score¹	Surrounding Protected Resource Land Score¹
Total Acres	Acres in Agriculture	Acres of Protected Resource Land	Percent in Agriculture (B/A)	Percent Protected Resource Land (C/A)		
746.6	302.2	203.3	40.48%	67.27%	10	60

1. The Surrounding Agricultural and Protected Resources Land Score was determined using the Surrounding Agricultural Land Rating Scoring Table and Surrounding Protected Resource Land Rating from the LESA Instruction Manual (California Department of Conservation 1997)

5. Weighting of Factors and Final LESA Scoring

The final project scoring is based on a scale of 100 points, with a given project being capable of deriving a maximum of 50 points from the Land Evaluation factors and 50 points from the Site Assessment factors. Scoring thresholds are based upon the total LESA score as well as the component Land Evaluation and Site Assessment subscores. Table E shows the Final LESA score of the Project's agriculture site.

Table E. Final LESA Score Sheet

	Factor Scores	Factor Weight	Weighted Factor Scores
Land Evaluation Factors			
Land Capability Classification	64.91	0.25	16.228
Storie Index Rating	35.94	0.25	8.985
Land Evaluation Subtotal			25.213
Site Assessment Factors			
Project Size	60	0.15	9
Water Resource Availability	95	0.15	14.25
Surrounding Agricultural Land	10	0.15	1.5
Protected Resource Land	60	0.05	3
Site Assessment Subtotal			27.75
Final LESA Score			52.963

Table F. LESA Model Significance Determination

Total LESA Score	Scoring Decision
0-39 Points	Not considered significant
40-59 Points	Considered significant <i>only</i> if LE <i>and</i> SA subscores are each <i>greater</i> than or equal to 20 points
60-70 Points	Considered significant <i>unless</i> either LE <i>or</i> SA subscore is <i>less</i> than 20 points
80-100 Points	Considered significant

Table F provides the LESA Model Significance thresholds. Sites receiving a total LESA score between 40 and 59 points are considered significant *only* if **both** the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. As identified in Table E, both the Land Evaluation and Site Assessment subscores exceed 20 points. Therefore, pursuant to the LESA model, the proposed conversion of the site from agriculture to non-agricultural uses would be considered significant.

Project Site



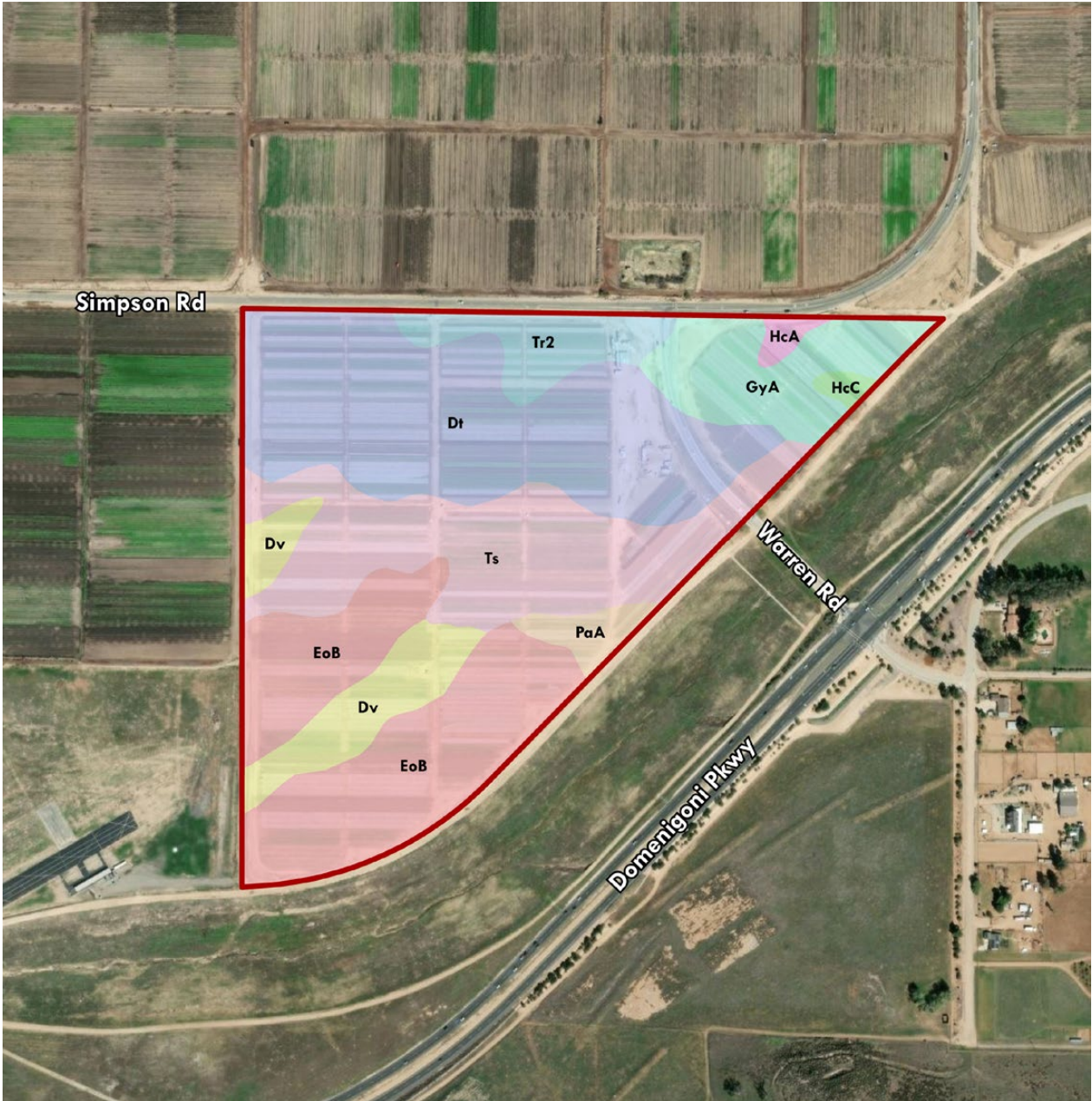
Farmland Classifications



-  Project Site
-  Farmland of Statewide Importance
-  Prime Farmland



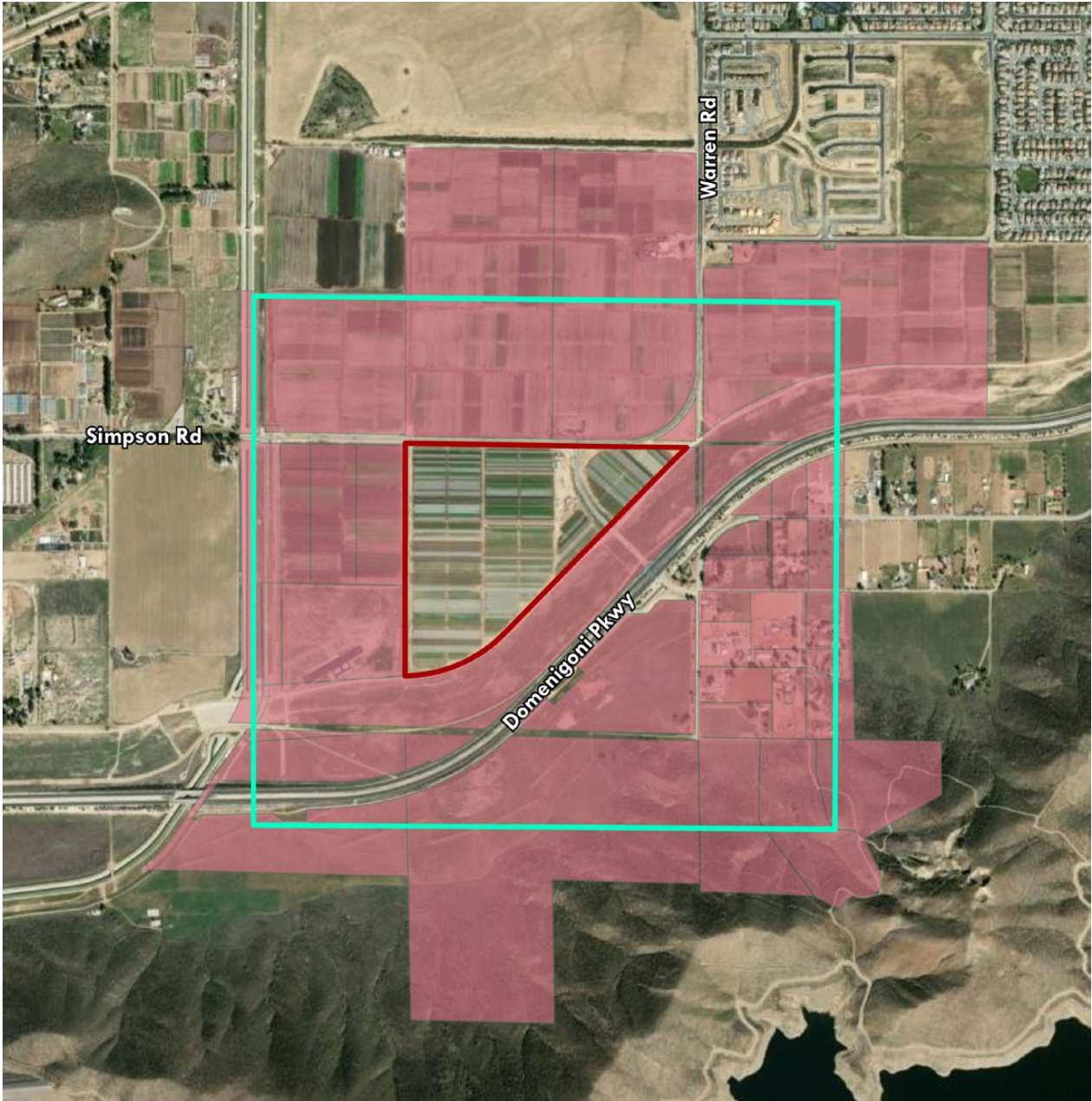
Onsite Soils



- Project Site
- Domino silt loam (Dv)
- Exeter sandy loam (EoB)
- Domino fine sandy loam (Dt)
- Traver fine sandy loam (Ts)
- Pachappa fine sandy loam (PaA)
- Traver loamy fine sand (Tr2)
- Hanford coarse sandy loam (HcA)
- Hanford coarse sandy loam (HcC)
- Greenfield sandy loam (GyA)



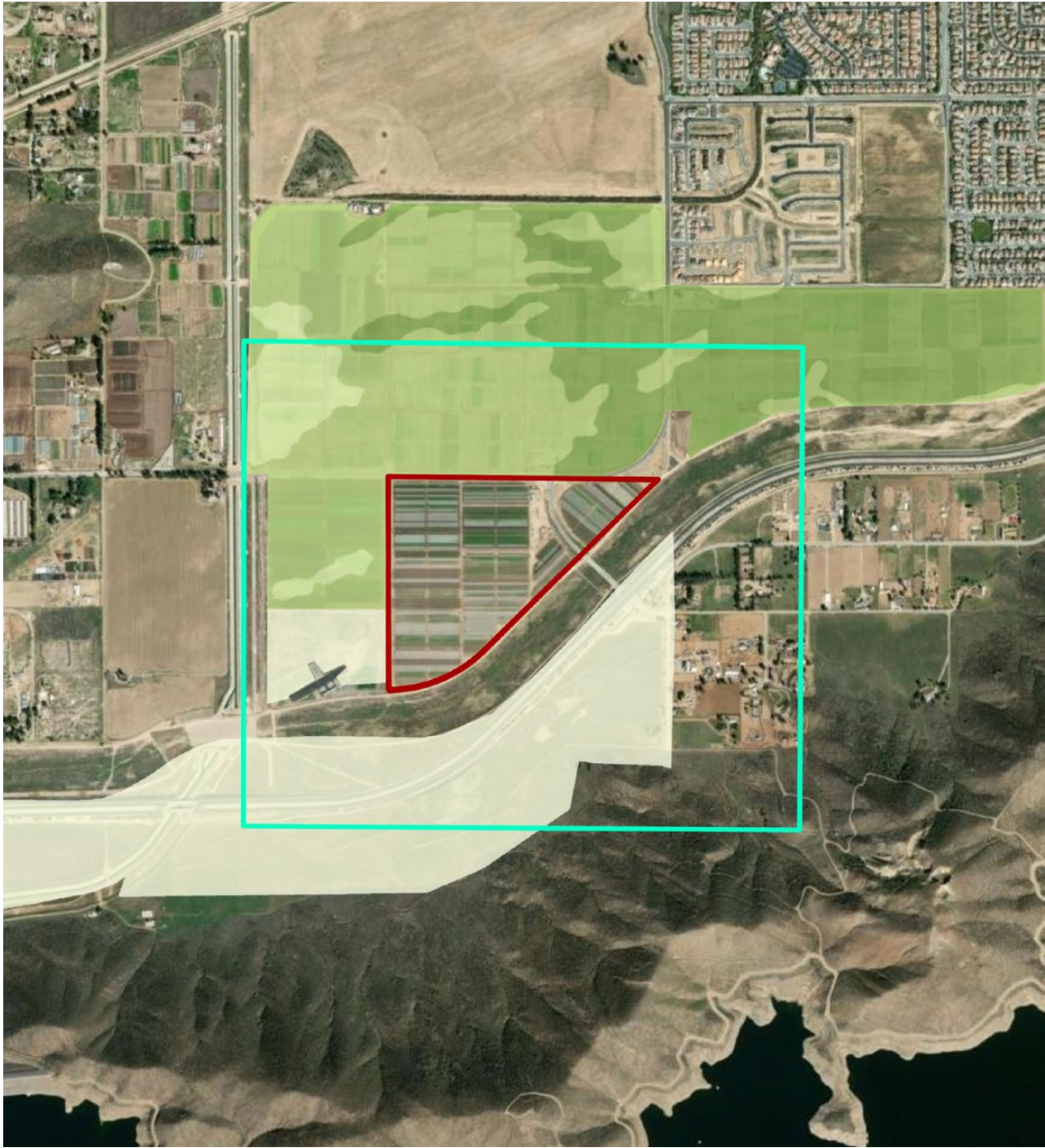
Project Zone of Influence



- Project Site
- 1/4 Mile Zone of Influence



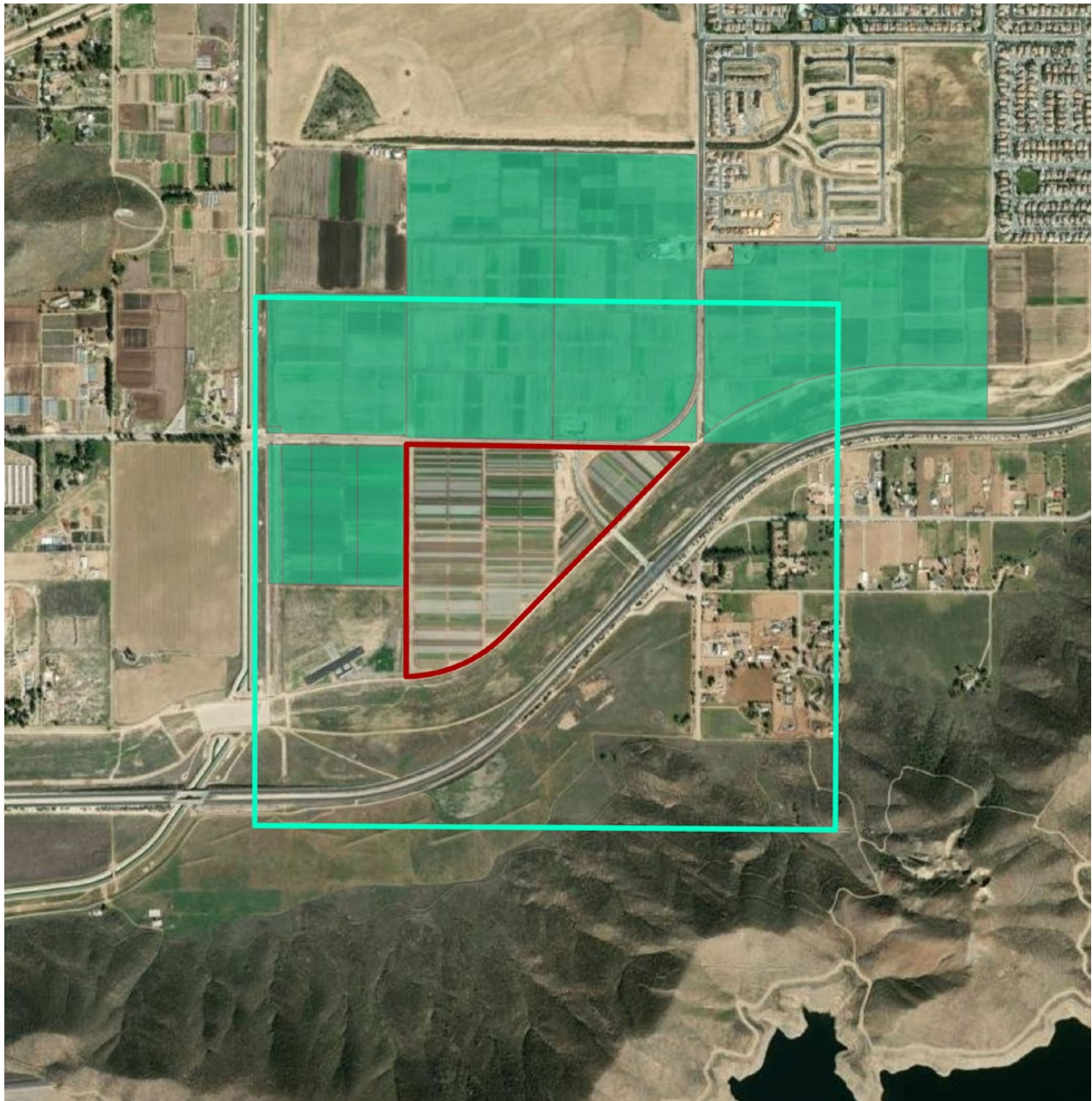
Project Zone of Influence Surrounding Agricultural Land






- Project Site
- Farmland of Statewide Importance
- Unique Farmland
- Prime Farmland
- Farmland of Local Importance



Project Zone of Influence Surrounding Agricultural Operations



-  Project Site
-  1/4 Mile Zone of Influence
-  Surrounding Existing Ag



6. References

California Department of Conservation (DOC). California Important Farmland Finder. 2022. Accessed from: <https://maps.conservation.ca.gov/DLRP/CIFF/>

California Department of Conservation (DOC). Office of Land Conservation. California Agricultural Land Evaluation and Site Assessment Model, Instruction Manual. 1997. Accessed from: https://www.conservation.ca.gov/dlrp/Pages/qh_lesa.aspx

County of Riverside, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), MSHCP Information Map. 2023. Accessed from: <https://planning.rctlma.org/epd/wr-mshcp>

U.S. Department of Agriculture. Natural Resources Conservation Service (NRCS). Web Soil Survey. Accessed from: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>