

Q.5.11 - Agricultural Resources

The following impact evaluation is based on the environmental setting, regulatory setting, and thresholds of significance discussions provided for the proposed projects in Draft EIR Section 5.11, Agricultural Resources, and in Appendix M-1 Expanded Agricultural Resources Analysis. These previous discussions are not repeated in the following evaluation. The evaluation is a comparative analysis between the Preferred Project and Proposed Project 4.

Convert Farmland to Non-Agricultural Use

Q5.11-A: **The project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, and pursuant to standards established by the California Coastal Commission.**

Project Specific Impact Analysis

Collection System

Similar to Proposed Project 4, the collection system under the Preferred Project is a gravity system. As described in Table Q.5-1, the Preferred Project includes additional collection system facilities such as pump stations, standby power stations, and pipelines, as well as modifications to specific locations and size of facilities such as the central pump station, pipelines within streets, and pipelines crossing creeks compared to Proposed Project 4. Based on a review of the additions and modifications of the collection system facilities, the Preferred Project would not convert any agricultural lands to non agricultural use similar to the finding for Proposed Project 4.

Treatment Plant Site

Similar to Proposed Project 4, the proposed treatment plant facilities under the Preferred Project include treatment facilities, appurtenant structures and storage facilities located on the Tonini parcel. As described in Table Q.5-1, the Preferred Project will include an Oxidation Ditch or Biolac® facility that encompasses less area and requires substantially less grading than the facultative ponds proposed under Proposed Project 4. Based on the revision to the proposed treatment plant facilities, the Preferred Project would convert less agricultural lands to a non-agricultural use (i.e., 20 acres) compared to Proposed Project 4 (32 acres); however, both the Preferred Project and Proposed Project 4 would result in the same potential significant farmland conversion impact.

Disposal Sites

Similar to Proposed Project 4, the proposed disposal systems under the Preferred Project include sprayfields at the Tonini parcel and leachfields at the Broderson parcel. Under the Preferred Project, the type of spray was revised to exclude percolation and as a result approximately 73 more acres of sprayfields are proposed to accommodate the 842 acre-feet of spray at Tonini compared to Proposed Project 4. Through a more detailed design, the Preferred Project includes setbacks from various environmental constraints (i.e., coastal streams, sensitive resource areas, along Turri Road, and on the southern boundary of the site). With these setbacks, the sprayfields within the Preferred Project

would result in direct impacts on 86 acres of land that is or could be used for crops and indirect impacts on 93 acres of land that is or could be used for crops. The total impact area of land that is or could be used for crops is 179 acres. In addition to land used for crops, the Preferred Project would result in direct impacts on 162 acres of land that is used for grazing and indirect impacts on 85 acres of land that is used for grazing. The total impact area of land that is used for grazing is 247 acres. Altogether, the disposal area that is or could be used for crops and grazing is 347 acres. As with Proposed Project 4, the proposed sprayfields would convert areas that are or could be used for crops and grazing to non-agricultural land. This conversion of land would result in a revenue loss of approximately \$1,056,558 which is approximately 21 percent higher than the revenue loss projected for Proposed Project 4 as revised in the Section 4, Errata/Minor Revisions, in the Final EIR/Response to Comment document. The implementation of sprayfields at the Tonini site that are within the Preferred Project and Proposed Project 4 would result in a potential significant farmland conversion impact.

Combined Project Effects

Similar to Proposed Project 4, the proposed facilities for the treatment and sprayfields under the Preferred Project would be located on the Tonini parcel. The combination of the two facilities on the Tonini parcel would encompass approximately 268 acres of the approximate 650-acre parcel. Through a more detailed design, the Preferred Project includes setbacks from various environmental constraints (i.e., coastal streams, sensitive resource areas, along Turri Road, and on the southern boundary of the site). With these setbacks, the proposed sprayfields and treatment plant facilities within the Preferred Project would result in direct impacts on 106 acres of land that is or could be used for crops and indirect impacts on 73 acres of land that is or could be used for crops. The total impact area of land that is or could be used for crops is 179 acres. In addition to land used for crops, the Preferred Project would result in direct impacts on 162 acres of land that is used for grazing and indirect impacts on 85 acres of land that is used for grazing. The total impact area of land that is used for grazing is 247 acres. Altogether, the treatment plant and disposal areas that are or could be used for crops and grazing is 347 acres. As with Proposed Project 4, the proposed sprayfields would convert areas that are or could be used for crops and grazing to non-agricultural land. This conversion of land would result in a revenue loss of approximately \$1,056,558 which is approximately 5 percent higher than the revenue loss projected for Proposed Project 4 as revised in the Section 4, Errata/Minor Revisions, in the Final EIR/Response to Comment document. The implementation of treatment plant facilities and sprayfields at the Tonini site that are within the Preferred Project and Proposed Project 4 would result in a potential significant farmland conversion impact.

Cumulative Impact Analysis

Similar to Proposed Project 4, the Preferred Project would result in potentially significant impacts relating to conversion of agricultural lands to a non agricultural use. Therefore, as with Proposed

Project 4, the Preferred Project would contribute to a significant cumulative agricultural conversion impact.

Mitigation Measures

Project-Specific

5.11-A1: Within two years of the start of operation of the facility, the County Department of Public Works shall provide evidence to the County Planning and Building Department that a farmland conservation easement, a farmland deed restriction, or other farmland conservation mechanism has been granted in perpetuity to the County or a qualifying entity approved by the County Agricultural Commissioner (or designee). The easement shall provide conservation acreage at a ratio of 1:1 for direct impacts and 0.5:1 for indirect impacts. Additionally, the project proponent shall provide appropriate funds (as determined by the County Planning Department) to compensate for reasonable administrative costs incurred by the easement holder. The area conserved shall be minimally sized at 347 acres, and shall be of a quality that is reasonably (as determined by the County Agricultural Commissioner or designee) similar to that of the farmland within the project limits. The area to be conserved shall be located within San Luis Obispo County within reasonable proximity to the project site.

Cumulative

Implementation of Mitigation Measure 5.11-A1 is required.

Level of Significance After Mitigation

Project-Specific

Significant and unavoidable.

Cumulative

Significant and unavoidable.

Conflict with Existing Zoning or Williamson Act Contract

Q5.11-B: The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

Project Specific Impact Analysis

Collection System

Similar to Proposed Project 4, the collection system under the Preferred Project is a gravity system. As described in Table Q.5-1, the Preferred Project includes additional collection system facilities such as pump stations, standby power stations, and pipelines, as well as modifications to specific locations and size of facilities such as the central pump station, pipelines within streets, and pipelines crossing creeks compared to Proposed Project 4. Based on a review of the additions and modifications of the

collection system facilities, the Preferred Project would not conflict with agricultural zoning or a Williamson Act contract similar to the finding for Proposed Project 4.

Treatment Plant Site

Similar to Proposed Project 4, the proposed treatment plant facilities under the Preferred Project include treatment facilities, appurtenant structures and storage facilities located on the Tonini parcel. As described in Table Q.5-1, the Preferred Project will include an Oxidation Ditch or Biolac® facility that encompasses less area and requires substantially less grading than the facultative ponds proposed under Proposed Project 4. Based on the revision to the proposed treatment plant facilities, the Preferred Project would conflict with a Williamson Act contract similar to the finding provided for Proposed Project 4. Therefore, similar to Proposed Project 4, the Preferred Project would result in a significant and unavoidable impact on the loss of Williamson Act contract land.

Disposal Sites

Similar to Proposed Project 4, the proposed disposal systems under the Preferred Project include sprayfields at the Tonini parcel and leachfields at the Broderson parcel. Under the Preferred Project, the type of spray was revised to exclude percolation and as a result approximately 73 more acres of sprayfields are necessary to accommodate the 842 acre-feet of spray at Tonini compared to Proposed Project 4. The Preferred Project also includes setbacks from Turri Road and the property south of Tonini, and Proposed Project 4 did not include setbacks. Based on a review of the increase in sprayfield area the proposed facilities would conflict with a Williamson Act contract. This impact finding is greater than the finding for Proposed Project 4, since the sprayfields would increase by 73 acres under the Preferred Project. Therefore, similar to Proposed Project 4, the Preferred Project would result in a significant and unavoidable impact on the loss of Williamson Act contract land.

Combined Project Effects

Similar to Proposed Project 4, the proposed facilities for the treatment plant and sprayfields under the Preferred Project would be located on the Tonini parcel. The combination of the two facilities on the Tonini parcel would encompass approximately 268 acres of the approximate 650-acre parcel. Similar to Proposed Project 4, the location of the treatment plant and sprayfields would conflict with a Williamson Act contract. This would be a potentially significant impact. Since the sprayfields would increase by 73 acres under the Preferred Project, this impact finding would be greater than that for Proposed Project 4 and remain a significant and unavoidable impact on the loss of Williamson Act contract land.

Cumulative Impact Analysis

Although the Preferred Project would result in a greater impact on Williamson Act contract land compared to Proposed Project 4, both would still result in significant and unavoidable impacts.

Mitigation Measures

Project-Specific

5.11-B1: Provide fencing of areas currently grazed on the Tonini parcel, and a buffer between the boundary of the disposal area and areas currently grazed. The width of the buffer shall be determined in consultation with the San Luis Obispo County Agricultural Commissioner's office.

Cumulative

Implementation of Mitigation Measure 5.11-B1 is required.

Level of Significance After Mitigation

Project-Specific

Significant and unavoidable.

Cumulative

Significant and unavoidable.

Other Changes Resulting in Farmland Conversion to Non-Agricultural Use

Q5.11-C: The project would not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

Project Specific Impact Analysis

Collection System

Similar to Proposed Project 4, the collection system under the Preferred Project is a gravity system. As described in Table Q.5-1, the Preferred Project includes additional collection system facilities such as pump stations, standby power stations, and pipelines, as well as modifications to specific locations and size of facilities such as the central pump station, pipelines within streets, and pipelines crossing creeks compared to Proposed Project 4. The Preferred Project would result in no other changes that convert land to a non agriculture use, and therefore no impacts. This finding is similar to the finding for Proposed Project 4.

Treatment Plant Site

Similar to Proposed Project 4, the proposed treatment plant facilities under the Preferred Project include treatment facilities, appurtenant structures and storage facilities located on the Tonini parcel. As described in Table Q.5-1, the Preferred Project will include an Oxidation Ditch or Biolac® facility that encompasses less area and requires substantially less grading than the facultative ponds proposed under Proposed Project 4. The Preferred Project would result in no other changes that convert land to a non agriculture use, and therefore no impacts. This finding is similar to the finding for Proposed Project 4.

Disposal Sites

Similar to Proposed Project 4, the proposed disposal systems under the Preferred Project include sprayfields at the Tonini parcel and leachfields at the Broderson parcel. Under the Preferred Project, the type of spray was revised to exclude percolation and as a result approximately 73 more acres of sprayfields are necessary to accommodate the 842 acre-feet of spray at Tonini compared to Proposed Project 4. The Preferred Project also includes setbacks from Turri Road and the property south of Tonini, and Proposed Project 4 did not include setbacks. Similar to Proposed Project 4, the Preferred Project would not result in other land use changes that would convert agricultural land use to a non-agricultural land use. Therefore, there would be no impact similar to Proposed Project 4.

Combined Project Effects

Similar to Proposed Project 4, the proposed facilities for the treatment and sprayfields under the Preferred Project would be located on the Tonini parcel. The combination of the two facilities on the Tonini parcel would encompass approximately 268 acres of the approximate 650-acre parcel. Although the Preferred Project would include an additional 73 acres of sprayfields compared to Proposed Project 4, the additional sprayfield area would not result in any other land use changes that would convert agricultural land use to a non-agricultural land use. Therefore, there would be no impact similar to Proposed Project 4.

Cumulative Impact Analysis

Although the Preferred Project would include an increase in the size of the sprayfields compared to Proposed Project 4, the facilities associated with the Preferred Project would not result in other land use changes that would convert agricultural land use to a non-agricultural land use. Therefore, there would be no cumulative impact similar to Proposed Project 4.

Mitigation Measures

Project-Specific

No mitigation measures are required.

Cumulative

No mitigation measures are required.

Level of Significance After Mitigation

Project-Specific

No impact..

Cumulative

No impact.

Local Goals and Policies Protecting Agricultural Resources.

Q5.11-D: The proposed project would not conflict with the local goals and policies protecting agricultural resources.

Project Specific Impact Analysis

Collection System

Similar to Proposed Project 4, the collection system under the Preferred Project is a gravity system. As described in Table Q.5-1, the Preferred Project includes additional collection system facilities such as pump stations, standby power stations, and pipelines, as well as modifications to specific locations and size of facilities such as the central pump station, pipelines within streets, and pipelines crossing creeks compared to Proposed Project 4. The Preferred Project would not conflict with local goals, policies, or ordinances pertaining to agricultural resources. Therefore, there would be no impacts. This finding is similar to the finding for Proposed Project 4.

Treatment Plant Site

Similar to Proposed Project 4, the proposed treatment plant facilities under the Preferred Project include treatment facilities, appurtenant structures and storage facilities located on the Tonini parcel. As described in Table Q.5-1, the Preferred Project will include an Oxidation Ditch or Biolac® facility that encompasses less area and requires substantially less grading than the facultative ponds proposed under Proposed Project 4. The Preferred Project would not result in any conflicts with local goals, policies, and ordinances pertaining to agricultural resources. Therefore, there would be no impacts. This finding is similar to the finding for Proposed Project 4.

Disposal Sites

Similar to Proposed Project 4, the proposed disposal systems under the Preferred Project include sprayfields at the Tonini parcel and leachfields at the Broderson parcel. Under the Preferred Project, the type of spray was revised to exclude percolation and as a result approximately 73 more acres of sprayfields are necessary to accommodate the 842 acre-feet of spray at Tonini compared to Proposed Project 4. The Preferred Project also includes setbacks from Turri Road and the property south of Tonini, and Proposed Project 4 did not include setbacks. The Preferred Project would result in changes that convert land to a non agriculture use; however, there are not other feasible alternative locations for sprayfields as discussed in Section 5.1 in the Draft EIR and Section Q.5.1 of this Response to Comment document.. Similar to Proposed Project 4, the facilities that are part of the Preferred Project would be consistent with applicable policies in the San Luis Obispo County General Plan and the applicable goals and policies in the Estero Area Plan. Therefore, similar to Proposed Project 4, the Preferred Project would result in no impacts to local agricultural goals and policies.

Combined Project Effects

Similar to Proposed Project 4, the proposed facilities for the treatment and sprayfields under the Preferred Project would be located on the Tonini parcel. The combination of the two facilities on the Tonini parcel would encompass approximately 268 acres of the approximate 650-acre parcel. The Preferred Project would still be consistent with local goals, policies, and ordinances since there are no

other feasible locations for sprayfields. Therefore, similar to Proposed Project 4, the Preferred Project would result in no impacts to local agricultural goals and policies.

Cumulative Impact Analysis

Since there would not be a conflict with goals, policies, and ordinances pertaining to agricultural resources, the Preferred Project would result in no cumulative impact similar to Proposed Project 4.

Mitigation Measures

Project-Specific

No mitigation measures are required.

Cumulative

No impact.

Level of Significance After Mitigation

Project-Specific

No impact.

Cumulative

No impact.