



September 24, 2019

**VIA EMAIL: WPATTERSON@CVWD.ORG**

William Patterson  
Coachella Water District  
75-515 Hovley Lane East  
Palm Desert, CA 92211

Governor's Office of Planning & Research

**SEP 24 2019**

**STATE CLEARINGHOUSE**

Dear Mr. Patterson:

NOTICE OF PREPARATION FOR THE COACHELLA VALLEY WATER DISTRICT  
SANITATION MASTER PLAN UPDATE 2020 DRAFT ENVIRONMENTAL IMPACT  
REPORT, SCH# 2019090307

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation (NOP) for the Coachella Valley Water District (CVWD) Sanitation Master Plan Update 2020 Draft Environmental Impact Report (DEIR). The Division monitors farmland conversion on a statewide basis and administers the Williamson Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

This Proposed Project provides a comprehensive capital improvement program consisting of recommendations to refurbish existing assets, optimize operations, and satisfy projected capacity needs of all sanitation facilities (collection system including gravity pipelines, force mains, lift stations, and the five water reclamation plants) in a phased program to be implemented in five-year implementation phases between 2020 to 2045. The purpose of the Proposed Project is to plan the expansion and upgrades of the CVWD sanitation system within the boundaries of CVWD for a planning period of 25 years in order to provide sustainable, cost-effective service to CVWD's current and future customers.

Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.<sup>1</sup> All mitigation measures that are potentially feasible should be included in the project's environmental

<sup>1</sup> Public Resources Code section 21002.

review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

Agricultural conservation easements on land of at least equal quality and size can mitigate the project impacts in accordance with CEQA Guideline § 15370. The Department highlights agricultural conservation easements because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA. Agricultural conservation easements are an available mitigation tool and should always be considered; however, any other feasible mitigation measures should also be considered.

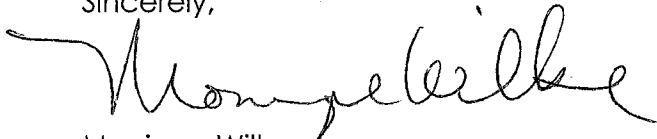
### Conclusion

The Department recommends the following discussion under the Agricultural Resources section of the DEIR:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measure for all impacted agricultural lands within the proposed project area.
- Proposed contract resolutions for proposed land uses not compatible with land in an agricultural preserve and/or enrolled in a Williamson Act.

Thank you for giving us the opportunity to comment on Notice of Preparation for the Coachella Valley Water District Sanitation Master Plan Update 2020 Draft Environmental Impact Report. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at [Farl.Grundy@conservation.ca.gov](mailto:Farl.Grundy@conservation.ca.gov).

Sincerely,



Monique Wilber  
Conservation Program Support Supervisor