



April 10, 2020

VIA EMAIL: MSUNDT@CI.GONZALES.CA.US

Matthew Sundt
City of Gonzales
Community Development Director
147 Fourth Street
Gonzales, CA 93926

Governor's Office of Planning & Research

APR 10 2020

STATE CLEARINGHOUSE

Dear Mr. Sundt:

CITY OF GONZALES, NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE VISTA LUCIA ANNEXATION PROJECT, SCH#2020039056

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of an Environmental Impact Report (EIR) for the Vista Lucia Annexation (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various 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

Cielo Grande Ranch LLC c/o Pembroke Development has submitted an application to the City requesting annexation and pre-zoning approvals for the project site. Annexation requires approval from both the City Council and Monterey County Local Agency Formation Commission (LAFCO). The proposed annexation and pre-zoning actions are intended to facilitate future development of the project site with a master planned urban community. The project site is one of several locations the City identified as a future development area in the Gonzales 2010 General Plan.

The proposed project site is located on approximately 768 acres within the City of Gonzales's Sphere of Influence, immediately east of the existing city limits. The site is generally bounded by Fanoe Road to the west, Associated Lane to the north, Iverson Road to the east, and a large agricultural property to the south.

Department Comments

The City has outlined mitigating policies, actions, and goals in its 2010 General Plan. The Department thinks that the implementation of Conservation and Open Space Policy 4.2

and implementing action 4.2.1, as well as, Conservation and Open Space Policy 4.3 and implementing action 4.3.3, would be beneficial to agricultural conservation.

- 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.
- Implementation of the City's policies, actions, and goals as outlined in the Conservation and Open Space section of its 2010 General Plan.
- Proposed mitigation measure for all impacted agricultural lands within the proposed project area.

Although direct conversion of agricultural land is often an unavoidable impact under CEQA analysis, mitigation measures must be considered. In some cases, the argument is made that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project, and therefore, mitigation is not required. However, reduction to a level below significance is not a criterion for mitigation under CEQA. Rather, the criterion is feasible mitigation that lessens a project's impacts.

All mitigation measures that are potentially feasible should be considered. A measure brought to the attention of the Lead Agency should not be left out unless it is infeasible based on its elements. The Department suggests that the City consider the adoption of an agricultural land mitigation program that will effectively mitigate the conversion of agricultural land.

Conclusion

Thank you for giving us the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Vista Lucia Annexation project. 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, Associate Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

Monique Wilber

Monique Wilber
Conservation Program Support Supervisor