



November 13, 2019

VIA EMAIL: AVALOSJ@GFUSD.NET

Jesse Avalos
Greenfield Union School District
1624 Fairview Road
Bakersfield, CA 93309

Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

Dear Mr. Avalos:

DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR THE
CRESCENT ELEMENTARY SCHOOL CONSTRUCTION PROJECT, SCH# 2019109098

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Initial Study and Mitigated Negative Declaration for the Crescent Elementary School Construction 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

Greenfield Union School District is proposing to construct and operate an elementary school within the unincorporated area of central Kern County. The elementary school campus will occupy approximately 23 acres of the project site. There will be multiple buildings, with an approximate area totaling almost 74,000 square feet. The school will be completed in phases, with the first phase constructing: an administrative building, a cafeteria/multipurpose room, and 31 classrooms.

The initial enrollment capacity will be 750 students with a potential to expand up to 1,080 students. The site would be primarily accessed from Panama Lane on the northern project boundary. Currently the project site is designated as Prime Farmland as defined by the Department of Conservation's Farmland and Mapping Program.¹

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

¹ Department of Conservation, Farmland Mapping and Monitoring Program, California Important Farmland Finder, 2019, <https://maps.conservation.ca.gov/DLRP/CIFF/>

available that would lessen the significant effects of the project.² All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

As the courts have shown³, agricultural conservation easements on land of at least equal quality and size can mitigate 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 further discussion regarding possible mitigation measures associated with the proposed projects impact and conversion of 23 acres of Prime Farmland.

Thank you for giving us the opportunity to comment on Draft Initial Study and Mitigated Negative Declaration for the Crescent Elementary School Construction 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
Conservation Program Support Supervisor

² Public Resources Code section 21002.

³ *Masonite Corp. v. County of Mendocino* (2013) 218 Cal.App.4th 230, 238.