



December 5, 2019

Governor's Office of Planning & Research

**VIA EMAIL: HGUERRA@CO.TULARE.CA.US**

**DEC 06 2019**

Mr. Hector Guerra  
Tulare County  
Chief Environmental Planner  
5961 South Mooney Boulevard  
Visalia, CA 93277-9394

**STATE CLEARINGHOUSE**

Dear Mr. Guerra:

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE LEMON COVE  
COMMUNITY PLAN 2019, SCH# 2019119031

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Initial Study/Mitigated Negative Declaration submitted by Tulare County (County) for the Lemon Cove Community Plan (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

The objective of the Lemon Cove Community Plan is to develop a plan which can accurately reflect the needs and priorities of the unincorporated community of Lemon Cove. In addition, the Initial Study/Mitigated Negative Declaration will address the potential environmental effects of the proposed plan, assist in fostering future economic development opportunities and grants.

Lemon Cove is located in the northern portion of Tulare County, approximately four (4) miles southeast of the City of Woodlake and eleven (11) miles northeast of the City Visalia. It is generally bounded by Avenue 319 in the south, Goodale Lane in the north, Road 236 in the west, and Road 248 in the east. The project area contains Prime Farmland, Farmland of Statewide Importance, and Unique Farmland as identified by the Department of Conservation's Farmland Mapping and Monitoring Program.<sup>1</sup>

#### Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to the State's agricultural land resources. Under CEQA, a lead agency should

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

not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.<sup>2</sup> 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 advises the use of permanent agricultural conservation easements on land of at least equal quality and size as mitigation for the loss of agricultural land. Conservation easements will protect remaining land resources and mitigate the project impacts in accordance with CEQA Guideline § 15370.

The Department supports County policy AG-1.6 Conservation Easements, and believes that implementation of this, and other agricultural policies outlined in the County's General Plan, would not only successfully mitigate the impacts from this project but would set the stage for the mitigation of future projects impacting California's important farmland.

A source that has proven helpful for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

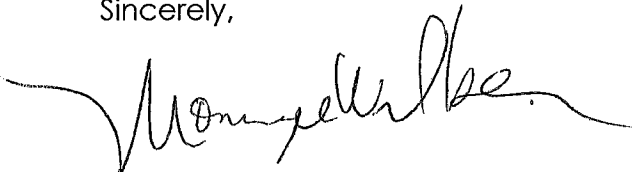
<http://www.calandtrusts.org/resources/conserving-californias-harvest/>

Another source is the Division's California Farmland Conservancy Program, which has participated in bringing about conservation easements throughout the State of California involving many California land trusts.

### Conclusion

Thank you for giving us the opportunity to comment on the Initial Study/Mitigated Negative Declaration for the Lemon Cove Community Plan 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, 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

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<sup>2</sup> California Environmental Quality Act Statute and Guidelines, Association of Environmental Professionals, 2017, Section 21002, page 2.