



APRIL 23, 2020

VIA EMAIL: LFARRIS@CITYOFREDLANDS.ORG

Loralee Farris, Principal Planner
City of Redlands
35 Cajon Street, Suite 20
PO Box 3005
Redlands, CA 92373

Governor's Office of Planning & Research

APR 23 2020

STATE CLEARINGHOUSE

Dear Ms. Farris:

MITIGATED NEGATIVE DECLARATION FOR THE REDLANDS HERITAGE SPECIFIC PLAN,
SCH#2020031164

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Mitigated Negative Declaration for the Redlands Heritage Specific 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 project involves development of 207 single-family residences with associated utilities, infrastructure, open space, and recreational areas on approximately 37.2 acres, located on the west side of Texas Street, north side of W. San Bernardino Avenue, and south side of Pioneer Avenue in the City of Redlands.

The project includes four parcels (APNs: 0167-091-02-0000, 0167-091-04-0000, 0167-091-05-0000, and 0167-091-08-0000) totaling approximately 37.2 acres. The planned development encompasses property located within the East Valley Corridor Specific Plan, which will be amended to remove this area out of that specific plan and into the proposed Heritage Specific Plan. The proposed site includes Prime Farmland and Farmland of Statewide Importance as identified by the Department of Conservation's Farmland Mapping and Monitoring Program¹.

¹ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, <https://maps.conservation.ca.gov/DLRP/CIFF/>

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.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.

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/>

Conclusion

The Department recommends the following discussion under the Agricultural Resources section of the Environmental Impact Report:

- 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 measures for all impacted agricultural lands within the proposed project area.

² Public Resources Code section 21002.

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

Thank you for giving us the opportunity to comment on the Mitigated Negative Declaration for the Redlands Heritage Specific Plan. 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