



MARCH 23, 2020

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GEORGE CUMMINGS  
DISTRICT DIRECTOR OF FACILITIES PLANNING  
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Governor's Office of Planning & Research

**MAR 25 2020**

**STATE CLEARINGHOUSE**

Dear Mr. Cummings:

FIRST RESPONDERS CAMPUS PROJECT, SCH# 2020039018

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Early Consultation for the First Responders Campus Project (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 would combine instruction and training for police, fire, corrections, EMT and paramedic programs at a single specialized campus. Currently, these programs are housed at separate locations throughout the District in facilities of varying age. Development of the proposed project would relocate these programs onto a single campus and into permanent modern facilities. Additionally, the project may allow for local public agencies to utilize the facilities at the campus for trainings and exercises related to the provision of police, fire, and emergency medical services.

Facilities planned as part of the project include approximately 61,600 square feet of academic building space and approximately 116,300 square feet of space for specialized site facilities. The academic buildings would house the District's Police, Fire, and EMS programs and include facilities such as classrooms, breakout rooms, conference rooms, administrative offices, restrooms, lounges, locker rooms, and storage space. The specialized site facilities include a scenario village, physical training areas, a grinder pad, a burn tower structure, a burn box, a driving pad, maintenance/facilities yard, and vehicle storage.

The project is located on a 39.21-acre parcel situated approximately one-quarter mile from the Fresno city limits and within the City of Fresno Sphere of Influence. The project site is neighbored by a mixture of industrial, commercial, agricultural, and rural residential land uses.

### 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 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 shown<sup>2</sup>, 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.

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

<sup>2</sup> *Masonite Corp. v. County of Mendocino* (2013) 218 Cal.App.4th 230, 238.

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

Thank you for giving us the opportunity to comment on the Early Consultation for the First Responders Campus 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](mailto:Farl.Grundy@conservation.ca.gov).

Sincerely,

*Monique Wilber*

Monique Wilber  
Conservation Program Support Supervisor