



APRIL 23, 2020

VIA EMAIL: [RYAN\\_KILBY@SANGERUSD.NET](mailto:RYAN_KILBY@SANGERUSD.NET)

Sanger Unified School District  
Ryan Kilby, Chief Operations Officer  
1905 Seventh Street  
Sanger, CA 93675

Governor's Office of Planning & Research

**APR 23 2020**

**STATE CLEARINGHOUSE**

Dear Mr. Kilby:

MCCALL K-12 EDUCATION CENTER PROJECT, SCH# 2020049008

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Early Consultation for the McCall K-12 Education Center 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 District is proposing to develop the McCall K-12 Education Center Project to serve the anticipated student enrollment growth generated by new urban development within the Sanger Unified portion of the City of Clovis Loma Vista Specific Plan. Facilities planned as part of the project include administrative offices, classrooms, multi-purpose buildings, sport fields, physical education facilities, and parking areas. Instructional activities at the Education Center will be in regular session on weekdays from late August to early June, with additional special events and classes during evenings, on weekends, and during the summer recess.

The project site is located on a 50-acre parcel on the west side of McCall Avenue at the alignment of Gettysburg Avenue, approximately 0.43 miles east of the nearest city limits of the City of Clovis in unincorporated Fresno County, (Fresno County APN 571-011-12). The project is located within the City of Clovis Sphere of Influence and within the City's Loma Vista Specific Plan Area. Currently, the project site is in agricultural use and is Unique, Statewide, and Prime Farmland as identified by the Department of Conservation's Farmland Mapping and Monitoring Program<sup>1</sup>.

<sup>1</sup> 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.<sup>2</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>3</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.
- 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 McCall K-12 Education Center Project. Please provide this Department with notices of

---

<sup>2</sup> Public Resources Code section 21002.

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

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