5.0 ALTERNATIVES

As required by Section 15126.6(c) of the *State CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project, in this case the proposed Countywide Water Conservation Program, which could feasibly achieve similar objectives. Included in this analysis are the CEQA-required "no project" alternative and three program modification alternatives. This section also describes five additional alternatives that were considered for inclusion but ultimately rejected.

As described in Section 2.0, *Project Description,* the objectives for the proposed Countywide Water Conservation Program (Program) include the following:

- *Substantially reduce increases in groundwater extraction in areas that have been certified at Level of Severity (LOS) III;*
- *Provide a mechanism to allow new development to proceed in certified LOS III groundwater basins, subject to the requirements of the County General Plan and County Code, in a manner that fully offsets projected water use;*
- *Provide a mechanism to allow new or altered irrigated agriculture to proceed in the Paso Robles Groundwater Basin, subject to the requirements of the County General Plan and County Code, in a manner that fully offsets projected water use; and*
- *Reduce the wasteful use of water in the county.*

Based on the potentially significant impacts that could result from implementation of the Program, as identified in Section 4.0, *Environmental Impact Analysis*, of this SEIR, and the objectives identified above, four alternatives were chosen for analysis in this section. The four alternatives evaluated are as follows:

- *Alternative 1: No Project*
- *Alternative 2: Larger Offset Requirement*
- *Alternative 3: Expanded Agricultural Offset Program*
- *Alternative 4: Altered Sunset Provisions*

As required by CEQA, this section also includes a discussion of the "environmentally superior alternative" among those studied.

5.1 ALTERNATIVES CONSIDERED BUT REJECTED

State CEQA Guidelines Section 15126.6(c) states that an EIR should "identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The following alternatives to the proposed Program were considered but rejected from further consideration because they were either determined to be infeasible or would fail to meet most of the basic Program objectives. These alternatives are described in the sections that follow.

5.1.1 Extension of Water Neutral New Development Program to LOS I and LOS II Basins

In its comment letter on the Notice of Preparation (NOP), the California Coastal Commission suggested that the Water Neutral New Development (WNND) requirements may be more effective in groundwater basins with LOS I and LOS II designations, where stringent requirements on water use may help to institute efficient water practices and prolong available supply (letter dated September 12, 2014; refer to Appendix A). In response to this suggestion, an alternative that would expand the scope of WNND requirements to groundwater basins certified at LOS I and LOS II for water supply (in both Inland and Coastal Zones) was considered.

As defined by the San Luis Obispo County Resource Management System (RMS), the criteria used to determine levels of severity for water supply are as follows:

- **LOS I.** When projected water demand projected over the next twenty years equals or exceeds the estimated dependable supply.
- **LOS II.** When projected water demand projected over the next fifteen to twenty years equals or exceeds the estimated dependable supply.
- **LOS III.** When projected water demand projected over the next fifteen years equals or exceeds the estimated dependable supply or the time required to correct the problem is longer than the time available before the dependable supply is reached.

Policies WR 1.13 and WR 1.14 in the San Luis Obispo County Conservation and Open Space Element (COSE) restrict density increases in rural areas that have a recommended or certified LOS II or III for water supply (WR 1.13) and restrict net increases in non-agricultural water use in groundwater basins that are recommended or certified as Level of Severity II or III for water supply (WR 1.14). The COSE does not contain policies restricting development or otherwise limiting water use in areas designated as LOS I for water supply. Because LOS I basins are not projected to exceed their dependable water supplies, there appears to be no need at this time to alter current County policy to limit such activities in LOS I groundwater basins. In addition, according to the *2010-2012 Resource Summary Report* (2013), there are no areas of the county currently designated or recommended as LOS II for water supply. Expanding WNND requirements to apply to LOS II areas would not, therefore, result in WNND requirements applying to additional areas at this time and therefore it is not proposed as part of the Program.

Given that expanding WNND requirements to LOS I groundwater basins would not be necessary and that there are no LOS II groundwater basins to which WNND requirements could be expanded, this alternative is considered infeasible, and was rejected from further consideration.

5.1.2 Elimination of the Program's Water Neutral New Development Requirements

This alternative would involve implementing the Water Waste Prevention (WWP) program but eliminating WNND requirements from the Program. As described in Section 4.1, *Agricultural Resources,* WNND requirements could result in the fallowing of agricultural fields, crop conversion, or conversion of irrigation systems as a means of reducing water consumption

within the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin). These activities would result in potentially significant impacts to Prime Farmland, Unique Farmland, and Farmland of Statewide Importance and Williamson Act lands, resulting in conversion of Farmland. However, mitigation is provided that would address these impacts and reduce them to a less than significant level. In addition, because the WWP program would still be implemented, this alternative would decrease water use throughout the county.

Although this alternative would reduce or eliminate potentially significant environmental impacts to agricultural resources, it would not specifically address groundwater extraction or increases in demand for groundwater supply in areas that have been certified at LOS III for water supply, although the WWP program requirements would partially reduce groundwater extraction in these areas through elimination of water wasting. This alternative would not meet the project objective of providing a mechanism to allow new development to proceed in certified LOS III groundwater basins in a manner that fully offsets projected water use. Nor would the project require Agricultural Offset Clearances be obtained for new or more intensively irrigated agricultural development in the Paso Robles Groundwater Basin beyond the expiration of the PRGWB Urgency Ordinance on August 27, 2015.

Section 15126.6(c) of the *State CEQA Guidelines* requires that the alternatives to a proposed project "include those that could feasibly accomplish most of the basic objectives of the project." Because this alternative would not meet most of the project objectives, it was rejected from further consideration.

5.1.3 Desalination Plant

Desalination refers to the process of removing salts and other minerals from saline water to produce potable water for human consumption or irrigation. While a desalination plant may provide a source of new water for San Luis Obispo County, a desalination plant is not considered a viable alternative to the proposed Countywide Water Conservation Program (Program). The primary objectives of the Program are to substantially reduce increases in groundwater extraction in groundwater basins certified at LOS III for water supply. A desalination plant, while providing a new water source, would not directly address these issues. Furthermore, a desalination plant would not address wasteful use of water in San Luis Obispo County, which is another key objective of the overall Program. Finally, planning, design, permitting, and construction of a desalination plant would require a much longer time frame than adoption of the proposed Program, which, if adopted, would immediately address the existing groundwater issues in the LOS III groundwater basins. The Agricultural Offset program for the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin) would have a sunset provision upon adoption of a Groundwater Sustainability Plan prepared pursuant to the Sustainable Groundwater Act, which may include provision of alternate supplies including desalination. Because this alternative would not meet project objectives and would require an extensive and time consuming approval process, a desalination plant was rejected from further consideration.

5.1.4 Development Moratorium

Rather than requiring an offset of new water demand, this alternative would place a moratorium on any development that would increase water demand in groundwater basins certified at LOS III for water supply, including (but not limited to): new residential, commercial, office, or public facilities development; addition or expansion of existing structures; new or intensified irrigated agriculture; and/or other changes in land use which may result in an increased water demand. No development could occur in LOS III groundwater basins under this alternative, until such time as the LOS III designation is downgraded by the Board of Supervisors.

This alternative is not considered a viable alternative to the proposed Program, in part, because it would not meet most of the basic project objectives. Although this alternative would substantially reduce increases in groundwater extraction in basins that have been certified at LOS III for water supply, it would not meet the project objective of providing a mechanism to allow new development to proceed in certified LOS III groundwater basins and to allow new or altered irrigated agriculture to proceed in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin), subject to the requirements of the County General Plan and County Code, in a manner that fully offsets projected water use. It would also not meet the project objective of reducing the wasteful use of water in the county, as no such activities would be prohibited.

5.1.5 Water Waste Prevention Ordinance for Agricultural Users

Under this alternative, an ordinance would replace the integration of best management practices (BMPs) into existing policy language and implementation of an educational outreach program. The primary objective of this alternative would be to develop and implement a permanent water-waste ordinance that addresses behavioral measures to improve agricultural water conservation.

Through consultation and coordination with the Agriculture Department, agricultural industry stakeholders, and small agriculturalist groups; and education and information obtained through round table discussions, field visits and research, perceived issues with the effectiveness of an ordinance and feasibility of enforcement of an agricultural water waste prevention ordinance were identified. These issues included:

1) The efficiency of agricultural water use in the County is already much greater than in the rest of the state due to the predominant use of groundwater and precision micro-irrigation with high-value crops, and this shift towards such crops is increasing;
2) Certain irrigation practices may be perceived by the public as wasteful, but are a normal and necessary part of agricultural operations;
3) Agriculturalists have an economic incentive to use water efficiently and not waste it because pumping costs are one of the largest single farming expenses, and;
4) Agriculturalists fix broken irrigation equipment promptly when discovered and notify fellow agriculturalists if they discover such equipment.

Based on this additional information, it was determined that this alternative could be difficult to implement without the support of key stakeholders and potentially duplicative of existing conservation efforts. In addition, it would not meet three of the primary project objectives (*substantially reduce increases in groundwater extraction in groundwater basins that have been certified at LOS III, providing a mechanism to allow new or irrigated agriculture to proceed in the Paso Robles Groundwater Basin,* and *reducing the wasteful use of water in the county)*, therefore, this alternative was rejected from further consideration.

5.2 ALTERNATIVE 1: NO PROJECT

5.2.1 Description

Under the No Project Alternative, no amendments to the Agriculture Element, COSE, or County Code would be made and implementation of the Countywide Water Conservation Program would not occur. Because WNND requirements would not be implemented, water offset requirements for new urban and rural development overlying groundwater basins certified at LOS III for water supply or new or more intensively irrigated agriculture overlying the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin) would be subject to existing requirements, as described in Section 2.0, *Project Description.* As previously described, the area overlying the Paso Robles Groundwater Basin (excluding cities), the community of Los Osos, and the community of Nipomo currently have a range of water neutral new development requirements in place. These requirements, which would continue to apply under the No Project Alternative, include the following:

- *The Paso Robles Groundwater Basin Urgency Ordinance (Ordinance No. 3246), which includes a requirement to offset increases in agricultural irrigation and plumbing retrofits to offset new non-agricultural development. Both agricultural and non-agricultural offsets are required at a 1:1 ratio. Absent a formal program, the approval of water offsets for new or more intensive agricultural activities are currently being approved on an individual basis at the discretion of the Planning Director. The Paso Robles Groundwater Basin Urgency Ordinance will expire on August 27, 2015, and under the No Project Alternative, the offset requirements in the Paso Robles Groundwater Basin will cease.*
- *The Los Osos Groundwater Basin Retrofit Ordinances, where two programs are currently in place. Title 8 requires that homes built before 1994 need to be retrofitted with new toilets and showerheads prior to sale. Title 19 requires that all new development in Los Osos retrofit enough existing homes and business to save twice the amount of water the new development would use (2:1 ratio). Remodels and additions to existing homes also require that the structure be retrofitted with new toilets and showerheads.*
- *The Nipomo Mesa Water Conservation Area Retrofit on Sale Requirement (Title 8), which requires that homes built before 1994 be retrofitted with new toilets and showerheads prior to sale. The Nipomo Mesa Water Conservation Provisions (Title 19) require that new development pays into a water conservation fund, managed by the Nipomo Community Services District, to conserve water within the ~~NMMA~~ Nipomo Mesa Water Conservation Area.*

Under the No Project Alternative, these existing programs would continue to be implemented, with the exception of the Paso Robles Groundwater Basin Urgency Ordinance after its expiration on August 27, 2015. What would not occur is a possible extension of the proposed

Urban/Rural Water Offset requirements to any groundwater basin that may be certified at LOS III or establishment of a formal program for agricultural water offsets in the Paso Robles Groundwater Basin. It is possible that a GSP, prepared pursuant to the Sustainable Groundwater Management Act, would ~~be adopted and~~ require offsetting, but it is unclear at this time whether a GSP would address the same concerns that the proposed Program would address.

As described in Section 4.2, *Land Use,* WNND requirements would maintain current water demand while allowing for development to occur consistent with the adopted General Plan and Land Use Ordinance. In this way, it provides a pathway for development in groundwater basins certified at LOS III for water supply without provision of a new water supply source. Under the No Project Alternative, development could still occur in groundwater basins certified at LOS III consistent with existing requirements. In areas overlying the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin), this would include a 1:1 offset for both agricultural and non-agricultural development, similar to the proposed Program, but only through August 27, 2015. Upon expiration, offset requirements for all future development (agricultural and non-agricultural) over the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin) would be removed and increases in demand for groundwater would resume. In Los Osos, existing requirements include a 2:1 offset requirement for non-agricultural development; similar to the proposed Program, these requirements would remain the same under the No Project Alternative. Finally, in Nipomo, existing water neutral new development requirements are limited to fees for new development to conserve water within the ~~NMMA~~ Nipomo Mesa Water Conservation Area and the requirement to retrofit existing homes for sale. Again, under the No Project Alternative, these requirements would remain in place. Overall, the No Project Alternative would allow the same amount of development as the proposed Program, as neither would result in changes to land use designations or zoning; however, the No Project Alternative would not result in the accompanying limitation on increases in demand for groundwater in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin) once the Paso Robles Groundwater Basin Urgency Ordinance expires or provide for a turf removal program to provide offsets for new development.

Because the WWP program would not be implemented under this alternative, water wasting would not be prohibited within unincorporated areas of the county where such an ordinance (or other comparable program) is not already in place. Therefore, in areas where the WWP program would apply, residents may continue to perform activities defined as water wasting, as outlined in Section 2.0, *Project Description.* It is worth noting, however, that consistent with State Water Resource Control Board (SWRCB) Resolution No. 2014-0038, the following conservation measures would continue to be required countywide until such time as the Governor's drought declaration is rescinded:

- *No watering of outdoor landscapes that cause runoff;*
- *No using hoses without shut-off nozzles;*
- *No using water in a fountain or decorative water feature, unless the water is recirculated; and*
- *No washing of driveways and sidewalks.*

The above prohibitions are generally consistent with the WWP program, with the exception of the application of water to outdoor landscapes more than three times per week, which would be

banned under the proposed Program, but not under the No Project Alternative. The above prohibitions would also be implemented at the state level, and would only be in effect during the Governor's drought declaration. In comparison, local oversight of the proposed Program would be anticipated to generate a higher degree of compliance, and the proposed Program would be a longer-term solution. As a result, the No Project Alternative would be expected to result in more wasteful water practices than the proposed Program.

5.2.2 Impact Analysis

Agricultural Resources. The Los Osos Basin and ~~NMMA~~ Nipomo Mesa Water Conservation Area do not have existing Agricultural Water Offset programs. In areas overlying the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin), the existing Agricultural Water Offset program [as described in Section 2.3.1(a) of Section 2.0, *Project Description*] would continue to apply through August 27, 2015. During this time, similar to the proposed Program, water offsets could be granted by fallowing an existing agricultural property. This could result in ~~impacts to~~ fallowing of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, and may also conflict with existing Williamson Act contracts. ~~Mitigation Measure AG-1 in Section 4.1, *Agricultural Resources*, would prohibit the fallowing of these important farmlands, and would restrict changes in irrigation type/method or conversions of crops that would change the designation of important farmlands. This measure would reduce impacts of the Program to important farmlands and Williamson Act contracts to a less than significant level.~~ The No Project Alternative would allow potential fallowing of agricultural land in areas overlying the Paso Robles Groundwater Basin through August 27, 2015~~, without the benefit this mitigation measure. Thus, the impacts of this alternative would be unmitigated, and therefore greater than the proposed Program.~~[1] Similar to the proposed Program, the fallowing of these lands would not constitute a significant impact; therefore, impacts related to conversion of Important Farmland under this alternative would be less than significant, similar to the proposed Program.

The No Project Alternative would not alter existing land use or zoning designations. Similar to the proposed Program, new development would be subject to the requirements of the County General Plan and County Code and thus it would not conflict with agricultural operations. Impacts related to conflicts with existing zoning for agricultural use would be similar to those of the proposed Program, which are less than significant.

Land Use and Planning. Because this alternative would not amend the Agriculture Element, COSE, or County Code, there would be no direct impact related to potential consistency with applicable land use plans, policies, or regulations. Similar to the proposed Program, the No Project Alternative would not alter existing zoning or land use designations and therefore would not affect development potential in the county. It should be noted, however, that the proposed Program is intended to substantially reduce increases in groundwater extraction in areas certified at LOS III for water supply. Several county policies are intended to protect groundwater resources, including specifically for continued agricultural production (including Policy AGP10, Policy AGP11, and Goal WR 2, see Section 4.2, *Land Use*).

~~[1] *It should be noted that the existing requirement for agricultural water offsets in the Paso Basin would expire on August 27, 2015. Therefore, the No Project Alternative would not result in the fallowing of agricultural land after that time. However, because conversion of important farmland may be permanent, the fallowing of agricultural land prior to this date would still be considered potentially significant.*~~

Because the No Project Alternative would do nothing additional to curb continued increases in groundwater demand, it would be potentially inconsistent with the intent of certain County policies.

5.3 ALTERNATIVE 2: LARGER OFFSET REQUIREMENT

5.3.1 Description

This alternative would modify the proposed WNND requirements for new urban and rural development in groundwater basins certified at LOS III for water supply to offset water use at a ratio of 2:1 rather than 1:1. In addition, new or more intensively irrigated agriculture in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin) would be required to offset water use at a ratio of 2:1 rather than 1:1 as currently proposed. This alternative would also require that, in order to calculate the 2:1 ratio requirements for agricultural irrigation water, the low end of the range for water use by crop provided in the proposed Agricultural Offset program (see Table 2-3 in Section 2.0, *Project Description*) be used to calculate water use on the sending site (i.e. the location providing the offset) and the high end of the range for water use be used for the crop on the receiving site. In this way, the Larger Offset Requirement Alternative would further serve to limit depletion of groundwater in the Paso Robles Groundwater Basin.

Similar to the proposed Program, the agricultural water offset requirement in the Paso Robles Groundwater Basin would be extended beyond the expiration date of the Paso Robles Groundwater Basin Urgency Ordinance. This alternative would also extend the requirement to offset non-agricultural water use in all three currently certified LOS III groundwater basins. The methods of offsetting water use would be the same as the proposed Program, including: plumbing retrofits, turf removal, and transferring water credits between landowners. However, the amount of the offset required under this alternative would be increased compared to the proposed Program.

The WWP program would not be modified under this alternative, and would be implemented similar to the proposed Program.

5.3.2 Impact Analysis

Agricultural Resources. As described in Section 4.1, *Agricultural Resources,* the proposed Program would result in the fallowing of agricultural fields, crop conversion, or conversion of irrigation systems as a means of reducing water consumption. These activities would result in ~~potentially significant impacts to~~ the fallowing of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance~~; Williamson Act lands; resulting in conversion of Farmland~~. ~~These potentially significant impacts would occur as a result of the Agricultural Offset program.~~ Because this alternative would increase the offset requirement from a 1:1 ratio to a 2:1 ratio, this alternative would double the amount of water required to be offset for new agricultural uses. These water offsets could be granted through the elimination of existing crops, which could result in a larger amount of agricultural land fallowed under the Program. Impacts associated with this alternative would therefore be greater than for the proposed Program. However, as with the proposed Program, ~~Mitigation Measure AG-1 would prohibit~~ the fallowing of

important farmlands would not be considered a conversion to non-agricultural use, and would not constitute a significant impact~~restrict changes in irrigation type/method or conversions of crops that would change the designation of important farmlands~~. ~~Application of this measure to~~ Therefore, the Larger Offset Requirement Alternative would result in less than significant impacts, similar to the proposed Program.

The Larger Offset Requirement Alternative would not alter existing land use or zoning designations. Similar to the proposed Program, new development would be subject to the requirements of the County General Plan and County Code and thus it would not conflict with agricultural operations. Impacts related to conflicts with existing zoning for agricultural use would be similar to those of the proposed Program, which are less than significant.

Land Use and Planning. The Larger Offset Requirement Alternative would be similar to the proposed Program, in that similar modifications to the Agriculture Element, COSE, and County Code would be made. This alternative would simply double the offset requirement associated with the WNND component of the proposed Program. In this way, the alternative would be similar to the proposed Program but would result in a net water savings from new urban and rural development in all LOS III certified areas and from new or more intensively irrigated agricultural development in the Paso Robles Groundwater Basin (whereas the proposed Program would remain water neutral).

As described in Section 4.2, *Land Use,* the proposed Program would be potentially consistent with applicable policies of the County of San Luis Obispo General Plan and other applicable planning documents, pursuant to implementation of mitigation measures identified in the SEIR. Several county policies are intended to protect groundwater resources, including specifically for continued agricultural production (including Policy AGP10, Policy AGP11, and Goal WR 2, see Section 4.2, *Land Use*). Because the Larger Offset Requirement Alternative would result in a net water savings, it would be potentially more consistent with the intent of these policies than the proposed Program.

5.4 ALTERNATIVE 3: EXPANDED AGRICULTURAL OFFSET PROGRAM

5.4.1 Description

This agricultural water offset component of this alternative is based on the offset program originally proposed by the Upper Salinas – Las Tablas Resource Conservation District (RCD) for the Paso Robles Groundwater Basin as described in the document *Agricultural Water Offset Program, Paso Robles Groundwater Basin* (October 2014)(included as Appendix B in this SEIR). Under this alternative, all of the original provisions of that program, as described below and in Section 3 of the RCD document, would be applied rather than the simplified version included in the proposed WNND requirements. The Agricultural Offset program would be applied in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin), as well as in the ~~NMMA~~ Nipomo Mesa Water Conservation Area and Los Osos Groundwater Basin under this alternative. Under this alternative credits would not be able to be used to increase pumping within severe groundwater level decline areas as defined by the County. Also, unlike the proposed Program, all agricultural water credit transactions would be evaluated to ensure the

water credit is hydrogeologically connected to the new water use and would require a well interference analysis.

Similar to the proposed Program, credits for the Expanded Agricultural Offset program may come from the following potential sources available from current documented practices:

- Fallowing of irrigated land resulting in less pumping;
- Crop conversion(s) to less water intensive crops as designated by the adopted program water use charts (e.g. alfalfa to olives, irrigated pasture to dryland range, water intensive deciduous crops to less intensive deciduous, grain or vegetable crops, etc.).

This program would apply to new irrigated agricultural development overlying all groundwater basins certified at LOS III, rather than just the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin). Similar to the proposed Program, new irrigated agricultural development includes the following:

a. Irrigated agricultural crop conversions;
b. New irrigated agricultural development on previously un-irrigated land; and
c. Replanting of existing irrigated crops (of the same crop type) where the replanting results in an increase of crop density or other modification that leads to increased water use (e.g. change in irrigation system or cropping patterns).~~; and~~
~~d. Hobby agriculture for rural residential users.~~

Similar to the proposed Program, both on-site modifications to existing agricultural activities that increase water use along with new irrigated agriculture and/or crop conversions would be able to take advantage of the offset program to allow increased water use on-site. Unlike the proposed Program, offset applications for new irrigated agriculture would be divided into five categories based on the characteristics of the application, and the complexity of review necessary for Offset Clearance approval would vary between categories. As with the proposed Program, each offset application would be reviewed for compliance with the requirements of the program. Unlike the proposed Program, applicants would be required to enter into an agreement with the County for continued annual verification of water use.

The most stringent information requirements would be applied to Category IV. The individual offset requirements for each category are shown in Table 5-1. Each of these criteria is defined in the following sections, several of which are similar to the proposed Program.

Table 5-1
Alternative 3 Offset Approval Criteria

	On-Site Modifications	Category I	Category II	Category III	Category IV
Determination of Maximum Net Acreage	✓	✓	✓	✓	✓
Hydrogeological Strata Analysis			✓	✓	✓
Neighboring Well Impact Analysis			✓	✓	✓
Landowner Agreements	✓	✓	✓	✓	✓
Proximity Analysis					✓

Table 5-1
Alternative 3 Offset Approval Criteria

	On-Site Modifications	Category I	Category II	Category III	Category IV
Deed Covenants	✓	✓	✓	✓	✓
Installation of Well Meter(s)	✓	✓	✓	✓	✓

Source: Sections 3.4 and 3.5 of the Final Report on the Agricultural Water Offset Program, Paso Robles Groundwater Basin, October 2014.

Similar to the proposed Program, applications shall include verification that the proposed crop, irrigation, and/or management modifications can stay within the maximum applied water amount as calculated per the Agricultural Offset program.

Determination of maximum net acreage and applied water allotment. For the purposes of the Agricultural Offset program, the crop categories and water use values presented in Tables 2-2 and 2-3 in Section 2.0, *Project Description*, would be used to determine the potential credit and/or amount of credit needed to satisfy the requirements of the offset program. Water credits for new agricultural uses would be calculated in the same manner as for the proposed Program.

Hydrologic strata analysis. Unlike the proposed Program, the proposed offset credit source for Categories II, III and IV would be derived from a well that is open to similar hydrogeological strata as the receiving well.

Neighboring well impact analysis. Unlike the proposed Program, applicants for Categories II, III and IV offsets would be required to demonstrate that active wells (irrigation and domestic) located near the receiving well would not be significantly impacted by the additional water level drawdown caused by the receiving well.

Landowner agreements. Similar to the proposed Program, a notarized signed copy of the agreement for transfer of offset credits between participating private landowners is required to be submitted to the County. The County would then ensure that participating landowners list the credit amount and agree to supply the credits in perpetuity, or until the basin reaches a LOS I or better ranking.

Proximity analysis. Under this alternative, the proposed offset well location(s) for Category IV applications must be within the cone of depression formed by the well serving the new use based on the parameters defined in the program. If the resulting water level recovery at the credit well location falls within the cone of depression of the pumping well serving the new use, the proposed offset credit is assumed to benefit the aquifer and offset the new use.

Deed Covenants. Similar to the proposed Program, all properties included in an Agricultural Offset Clearance request for either sending sites or receiving sites shall include a deed covenant recorded against the properties, regardless of whether or not the properties are owned by the same entity or person. Deed covenants will be required to be in a form approved by the County and the County would be entitled to enforce the agreement.

Installation of flow meters. Similar to the proposed Program, all approved Agricultural Offset Clearance applications will require that a meter be installed on all sending and receiving wells prior issuance of a clearance.

No sunset clause is included for the agricultural offset program as part of this alternative.

The Urban/Rural Water Offset program and WWP program would not be modified under this alternative, and would be implemented similar to the proposed Program.

5.4.2 Impact Analysis

Agricultural Resources. As described in Section 4.1, *Agricultural Resources,* the proposed Program would result in the fallowing of agricultural fields, crop conversion, or conversion of irrigation systems as a means of reducing water consumption. These activities would result in ~~potentially significant impacts to~~ the fallowing of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance~~; Williamson Act lands; resulting in conversion of Farmland~~. ~~These potentially significant impacts would occur as a result of the Agricultural Offset program.~~ Because the Expanded Agricultural Offset Program Alternative would extend the Agricultural Offset program to new irrigated agricultural development overlying all LOS III groundwater basins (rather than the Paso Robles Groundwater Basin only), this alternative would increase the amount of agricultural water offsets in the county. These water offsets could be granted through the elimination of existing crops, which could result in a larger amount of agricultural land fallowed under the Program. Impacts to agricultural resources would therefore be slightly greater under this alternative. However, as with the proposed Program, the fallowing of important farmlands would not be considered a conversion to non-agricultural use, and would not constitute a significant impact ~~Mitigation Measure AG-1 would prohibit the fallowing of important farmlands, and would restrict changes in irrigation type/method or conversions of crops that would change the designation of important farmlands~~. ~~Application of this measure to~~ Therefore, Alternative 3 would result in less than significant impacts related to important farmland conversion~~after application of the required mitigation~~, similar to the proposed Program.

The Expanded Agricultural Offset Program Alternative would not alter existing land use or zoning designations. Similar to the proposed Program, new development would be subject to the requirements of the County General Plan and County Code and thus it would not conflict with agricultural operations. Impacts related to conflicts with existing zoning for agricultural use would be similar to those of the proposed Program, which are less than significant.

Land Use and Planning. This alternative would be similar to the proposed Program, in that similar modifications to the Agriculture Element, COSE, and County Code would be made. Because the offset requirement would be a 1:1 ratio, similar to the proposed Program, this alternative would neither increase nor decrease water use over current levels. Rather, it would maintain current water use while allowing new agricultural development to occur consistent with the adopted General Plan and Zoning Ordinance.

As described in Section 4.2, *Land Use,* the proposed Program would be potentially consistent with applicable policies of the County of San Luis Obispo General Plan and other applicable

planning documents, pursuant to implementation of mitigation measures identified in the SEIR. Several county policies are intended to protect groundwater resources, including specifically for continued agricultural production (including Policy AGP10, Policy AGP11, and Goal WR 2, see Section 4.2, *Land Use*). Because this alternative would similarly maintain current water use while allowing new agricultural development in LOS III groundwater basins, it would be similarly potentially consistent with these and other General Plan policies.

5.5 ALTERNATIVE 4: ALTERED SUNSET PROVISIONS

5.5.1 Description

This alternative would include the same Urban/Rural Water Offset requirements and WWP program as included in the proposed Program. In addition, this alternative would also include a simplified version of the Agricultural Offset program that applies only to the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin). No Agricultural Offset program would be implemented in the ~~NMMA~~ Nipomo Mesa Water Conservation Area or Los Osos Groundwater Basin under this alternative.

The only variation between this alternative and the proposed Program would be in the form of the sunset provision for both the Urban/Rural Water Offset requirements and the Agricultural Offset program. In the proposed Program, the Agricultural Offset program in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin) would sunset upon the adoption of a Groundwater Sustainability Plan (GSP) by a Groundwater Sustainability Agency (GSA). No sunset provision is currently envisioned in the proposed Program for the Urban/Rural Water Offset requirements.

Under this alternative, both the Urban/Rural Water Offset requirements and Agricultural Offset program could sunset under any one of the following conditions:

1. Upon implementation of a GSP that assures water neutrality, prohibits waste, and addresses irrigation BMPs (this differs from the proposed sunset provision of *adoption* of a GSP for the proposed Program);
2. Board of Supervisors declaration of an end to emergency drought conditions; or
3. Board of Supervisors downgrading a LOS III certified basin to LOS I or LOS II.

5.5.2 Impact Analysis

Agricultural Resources. This alternative would modify the sunset provision for the proposed Program and would extend the sunset provisions to the Urban/Rural Water Offset requirement (in addition to the Agricultural Offset program, which has a sunset provision under the proposed Program). Because there would be multiple scenarios under which the Program could sunset, this alternative could potentially be in effect for a shorter period of time than the proposed Program. For example, if emergency drought conditions end (condition 2) or the Paso Robles Groundwater Basin is downgraded to LOS II (condition 3), the Program would no longer apply, even if a GSP is not yet adopted.

If emergency drought conditions continue or if LOS III-certified groundwater basins maintain their current LOS certifications (i.e. if conditions 2 or 3 are not met), then this alternative would apply for a longer period of time than the proposed Program. This is because condition 1 in the Altered Sunset Provisions Alternative would allow the Program to sunset only after implementation of a GSP, rather than at the time of adoption (as with the proposed Program). Under condition 1, the alternative would potentially be in effect for a longer period of time than the proposed Program.

As described in Section 4.1, *Agricultural Resources,* the proposed Program would result in the fallowing of agricultural fields, crop conversion, or conversion of irrigation systems as a means of reducing water consumption. These activities would result in ~~potentially significant impacts to~~ the fallowing of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance~~; Williamson Act lands; resulting in conversion of Farmland~~. ~~These potentially significant impacts would occur as a result of the Agricultural Offset program.~~ Because this alternative could potentially allow the Agricultural Offset program to sunset earlier than the proposed Program (under condition 2 and condition 3), this alternative may decrease the amount of agricultural water offsets in the county over time, thus resulting in fewer impacts to agricultural resources. On the other hand, this alternative would potentially allow the Agricultural Offset program to continue longer than the proposed Program (if condition 1 is selected), and may therefore increase the amount of agricultural offsets (and associated impacts) over time. As with the proposed Program, the fallowing of important farmlands would not be considered a conversion to non-agricultural use, and would not constitute a significant impact~~Mitigation Measure AG-1 would be required. This measure would prohibit the fallowing of important farmlands, and would restrict changes in irrigation type/method or conversions of crops that would change the designation of important farmlands~~. ~~Application of this measure to~~ Therefore, Alternative 4 would result in less than significant impacts whether the alternative results in a longer-term or shorter-term Program depending on the condition under which the alternative sunsets, similar to the proposed Program.

The Altered Sunset Provisions Alternative would not alter existing land use or zoning designations. Similar to the proposed Program, new development would be subject to the requirements of the County General Plan and County Code and thus it would not conflict with agricultural operations. Impacts related to conflicts with existing zoning for agricultural use would be similar to those of the proposed Program, which are less than significant.

Land Use and Planning. This alternative would be similar to the proposed Program, in that similar modifications to the Agriculture Element, COSE, and County Code would be made. This alternative would simply add three new conditions under which WNND requirements could sunset, and would extend these sunset provisions to the Urban/Rural Water Offset requirements. Because the offset requirements would be a 1:1 ratio, similar to the proposed Program, this alternative would neither increase nor decrease water use over current levels while the Program is in place. Rather, it would maintain current water use while allowing new urban, rural and agricultural (in the Paso Robles Groundwater Basin and excluding the Atascadero Sub-basin only) development to occur consistent with the adopted General Plan and Zoning Ordinance. As described in Section 4.2, *Land Use,* the proposed Program would be potentially consistent with applicable policies of the County of San Luis Obispo General Plan and other applicable planning documents. Minor potential inconsistencies would be addressed

by implementation of mitigation measures identified in the SEIR. Several county policies are intended to protect groundwater resources, including specifically for continued agricultural production (Policy AGP10, Policy AGP11, and Goal WR 2, see Section 4.2, *Land Use*). Because this alternative would similarly maintain current water use while allowing new urban and rural development in LOS III groundwater basins, and new irrigated agricultural development in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin), it would be similarly potentially consistent with these and other General Plan policies.

Because there are differences in when the individual sunset conditions would occur, some of the sunset condition alternatives would be better than the proposed Program at achieving the project objective of substantially reducing increases in groundwater extraction in certified LOS III groundwater basins. For example, declaration of the end of emergency drought conditions would cause the Program to sunset (condition 2). Even though offset requirements for all future development and restriction on wasteful uses of water would be removed and increases in demand for groundwater could resume, one or more of the groundwater basins may still be certified LOS III at that time. Therefore, this sunset condition would be worse than the proposed Program at substantially reducing increases in groundwater extraction from LOS III groundwater basins.

Sunset at a decrease from LOS III to LOS II (condition 3) would use a metric to ensure that the basin as a whole is close to equilibrium and capable of sustaining at least moderate growth without WNND requirements. Under the proposed Program, the Urban/Rural Water Offset requirements would not be subject to a sunset clause. *Adoption* of a GSP, which is the sunset condition included in the proposed Program for the Agricultural Offset program in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin), could allow increases in agricultural groundwater extraction without requirements to fully offset water use. Sunset condition 3 would be better than the proposed Program at reducing net increases in groundwater demand in the Paso Robles Groundwater Basin.

Sunset upon implementation of a GSP that that assures water neutrality, prohibits waste, and addresses irrigation BMPs (condition 1) would be better than the proposed Program at reducing net increases in groundwater demand in all certified LOS III groundwater basins. As noted above, the sunset condition included in the proposed Program is upon adoption of a GSP; note that this only applies to the Agricultural Offset program in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin). It is estimated that the period between adoption and implementation of a GSP could be up to 15 years. Therefore, during that period of time there would be no requirement to fully offset new agricultural water use in the Paso Robles Groundwater Basin.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This section evaluates the impact conclusions for the proposed Program and the four alternatives under consideration. It then identifies the environmentally superior alternative. In accordance with the *State CEQA Guidelines*, if the No Project Alternative is identified as the environmentally superior alternative, the alternative among the remaining scenario(s) that is environmentally superior must also be identified.

Table 5-2 shows whether each alternative's environmental impact is greater, lesser, or similar to the proposed Program for each issue area.

Table 5-2
Impact Comparison Summary

Issue	Proposed Program	No Project Alternative	Larger Offset Requirement Alternative	Expanded Agricultural Offset Program Alternative	Altered Sunset Provisions
Agricultural Resources	=	- =	-	-	+/-
Land Use and Planning	=	-	+	=	+/=
OVERALL	**=**	**-**	**+/-**	**=/-**	**+/-**

\+ *Environmentally superior to the proposed Program*
\- *Environmentally inferior to the proposed Program*
= *No better or worse than the proposed Program*

Based on the comparison provided in Table 5-2 and the discussion above, the Altered Sunset Provisions Alternative is potentially the most environmentally superior alternative, depending on the sunset condition selected. This alternative would modify the sunset provision for the proposed Program and would extend all possible sunset provisions to the Urban/Rural Water Offset requirement. In particular, a sunset provision under condition 1 of Alternative 4 would ensure that water neutrality and savings would occur regardless of the LOS of the groundwater basin. Condition 3 would ensure that water neutrality and savings occur until a LOS III groundwater basin has recovered to LOS II, at a minimum. Under the proposed Program, the Agricultural Offset requirement would sunset upon adoption of a GSP; it is unknown whether adoption of a GSP would accomplish the same water neutrality as under Conditions 1 and 3, particularly given the time anticipated to elapse between adoption and implementation.

The Larger Offset Requirement Alternative is also considered environmentally superior for one issue area. Because this alternative would reduce water demand in the certified LOS III groundwater basins (rather than being water demand neutral, as with the proposed Program), and would be potentially more consistent with the County's land use policy framework that promotes water conservation. However, because more agricultural land could be fallowed as a result of this alternative, ~~adverse~~ impacts related to agricultural resources would be greater than for the proposed Program (though they would continue to be less than significant). ~~Implementation of mitigation identified in this SEIR would reduce these impacts to a less than significant level.~~

The Expanded Agricultural Offset Program Alternative would result in greater impacts to agricultural resources than the proposed Program. This is because this alternative would extend the Agricultural Offset program to all certified LOS III groundwater basins, and would therefore increase the amount of agricultural water offsets in the county. These water offsets could be granted through the elimination of existing crops, which could result in a larger amount of agricultural land fallowed under the Program. Therefore, ~~adverse~~ impacts related to agricultural resources would be greater than for the proposed Program, although they would remain less than significant. ~~Implementation of mitigation identified in this SEIR would reduce these impacts to a less than significant level.~~ Alternative 3 would be potentially consistent with County's land use policy framework, similar to the proposed Program.

Because the No Project Alternative would continue to implement the current agricultural water offset requirements in the Paso Robles Groundwater Basin, without the requirement to implement the mitigation measures identified in this SEIR, during its remaining life, it would create a greater environmental impact than the proposed Program. In addition, this alternative would not accomplish the objectives of the proposed Program, including substantially reducing increases in groundwater extraction in certified LOS III groundwater basins, reducing the wasteful use of water in the County and providing a mechanism for new urban and rural development to proceed in certified LOS III groundwater basins and new or expanded agriculture to proceed in the Paso Robles Groundwater Basin in a manner that fully offsets projected water use.

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