EXECUTIVE SUMMARY

This section summarizes the characteristics of the proposed project, the environmental impacts associated with the project, and mitigation measures recommended to mitigate identified significant impacts.

PROJECT SYNOPSIS

Project Applicant

County of San Luis Obispo
976 Osos Street
San Luis Obispo, California 93408

Project Description

San Luis Obispo County is in the midst of an "exceptional drought" that has lowered water levels in groundwater basins and surface lakes and reservoirs throughout the County.[1] The Board of Supervisors has declared three groundwater basins, Nipomo Mesa Management Area (NMMA, being part of Santa Maria Groundwater Basin), the Los Osos Groundwater Basin, and the Paso Robles Groundwater Basin, at Level of Severity (LOS) III, which indicates that groundwater demand has met or exceeded the dependable supply.

To address these issues, the proposed Countywide Water Conservation Program (Program) includes amendments to the County General Plan and County Code that would affect water use in both new and existing development, as well as agricultural operations, and is comprised of two separate components. See Figure ES-1 for an illustration of the proposed Program and its various components.

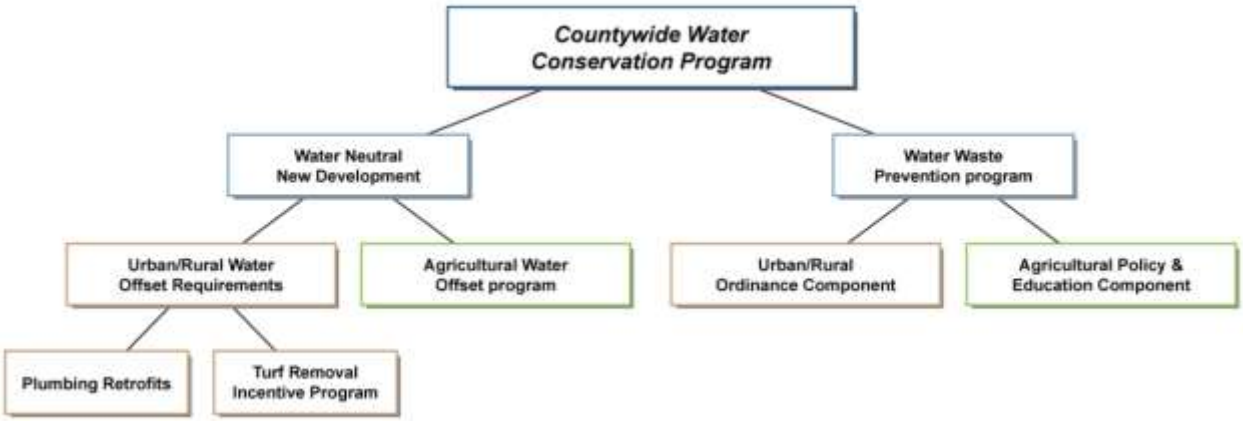

Figure ES-1 Illustration of Countywide Water Conservation Program

[1] *"Exceptional drought" is characterized by the United States Department of Agriculture (USDA) and the National Drought Mitigation center as having exceptional and widespread crop and pasture losses, shortages of water in reservoirs, streams and wells creating water emergencies.*

The first major component of the Program is Water Neutral New Development (WNND). WNND requirements would require that all new urban and rural development offset new water use at a minimum 1:1 ratio in all groundwater basins certified at LOS III by the Board of Supervisors (the Urban/Rural Water Offset). WNND also requires that, in the Paso Robles Groundwater Basin, all new or more intensively irrigated agriculture new water use at a minimum 1:1 ratio (the Agricultural Offset program). The proposed Agricultural Offset program is an implementation tool for the WNND irrigated agriculture offset requirement, and is intended as a measure to substantially reduce groundwater extraction and lowering of groundwater levels in the Paso Robles Groundwater Basin only. The proposed Agricultural Offset program would have a sunset provision upon adoption of a Groundwater Sustainability Plan prepared pursuant to the Sustainable Groundwater Management Act.

The second major component of the overall Program is the Water Waste Prevention (WWP) program. The WWP program is comprised of two elements, an ordinance applying to urban and rural development and policy clarifications that would apply to agricultural operations. The ordinance would apply to all existing and proposed urban and rural development within the unincorporated areas of the county where a water purveyor does not already have a similar ordinance (or other comparable program) in place. Provisions to reduce agricultural water waste would be limited to clarifications of policies and implementation measures found in the Agriculture Element of the General Plan, which would include best management practices as well as implementation of an educational outreach program.

As stated above, the three areas of the county that are currently certified at LOS III for water supply are the Paso Robles Groundwater Basin, the Los Osos Groundwater Basin, and the NMMA. Also as noted previously, if WNND requirements are approved, the Urban/Rural Water Offset requirements could also apply to any groundwater basins certified at LOS III in the future. Currently, the Cuyama Valley, Morro-Chorro and North Coast groundwater basins are all recommended in the 2010-2012 Resource Summary Report at LOS III but have not been certified by the Board of Supervisors.

Additional detail regarding the Countywide Water Conservation Program is provided in Section 2.0, *Project Description.*

ALTERNATIVES

As required by CEQA, the EIR examines a range of alternatives to the proposed Program. Studied alternatives include the following alternatives.

No Project Alternative (Alternative 1). 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 would be subject to existing requirements, as described in Section 2.0, *Project Description.* As described in Section 2.0, the areas 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.

Under the No Project Alternative, 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 an extension of the proposed Urban/Rural Water Offset requirements to any other groundwater basin that may be certified at LOS III in the future 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 Act, would be adopted and would require offsetting, but it is unclear at this time whether a GSP would address the same concerns that the proposed Program would address.

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, this would include a 1:1 offset for both agricultural and non-agricultural development, similar to the proposed Program. Upon expiration, offset requirements for all future development (agricultural and non-agricultural) over the Paso Robles Groundwater 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; these requirements would remain the same under the No Project Alternative. Finally, in Nipomo, existing water neutral new development requirements are limited to fees, administer by the Nipomo Community Services District, for new development to conserve water within the NMMA and conservation efforts in retrofitting existing homes for sale. Again, under the No Project Alternative, these requirements would remain in place.

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.*

Larger Offset Requirement Alternative (Alternative 2). 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 would be required to offset water use at a ratio of 2:1 rather than 1:1 as currently proposed.

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 to those which are designated LOS III in future. The methods of offsetting water use would be the same as the proposed Program, including: plumbing retrofits, turf removal, more efficient irrigation, 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.

Expanded Agricultural Offset Program Alternative (Alternative 3). The 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 in Section 5.0, *Alternatives*, 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, as well as in the NMMA and Los Osos Groundwater Basin under this alternative. Unlike the proposed Agricultural Offset program, 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 Alternative 3 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.).

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.

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.

Altered Sunset Provisions Alternative (Alternative 4). 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. No Agricultural Offset program would be implemented in the NMMA 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 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.

Based on the analysis in Section 5.0, *Alternatives*, the Altered Sunset Provisions Alternative is potentially the most environmentally superior alternative, depending on which sunset scenario is applied. If condition 3 (downgrading a LOS III certified basin to LOS I or LOS II) is applied as the sunset provision for the Program, then Alternative 4 would be environmentally superior to the proposed Program for both agricultural resources and land use. If condition 1 is applied it would be environmentally superior for land use and incrementally inferior for agricultural resources. However, potentially significant impacts to agricultural resources under this alternative would be reduced to a less than significant level by application of the mitigation measures identified in Section 4.1.

The Larger Offset Requirement Alternative would be environmentally superior to the proposed Program in terms of land use impacts. Alternative 2 would reduce water demand in the LOS III-certified groundwater basins (rather than being water demand neutral, as with the proposed Program); therefore, it would be potentially more consistent with the County's land use policy framework promoting water conservation. Agricultural resources impacts would be incrementally greater than from the proposed Program, due to the greater amount of land fallowing that could occur. Implementation of mitigation identified in this SEIR would reduce agricultural resource impacts to a less than significant level.

As required by State CEQA Guidelines Section 15126.6(c), the EIR also lists the following alternatives that were considered by the Lead Agency but rejected as infeasible, as detailed in Section 5.0, *Alternatives*.

- Extension of Water Neutral New Development Program to LOS I and LOS II Basins
- Elimination of the Program's Water Neutral New Development Requirements
- Desalination Plant
- Development Moratorium
- Water Waste Prevention Ordinance for Agricultural Users

SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Table ES-1
Summary of Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Residual Impact
AGRICULTURAL RESOURCES		
Impact AG-1 The Agricultural Offset program component of the Countywide Water Conservation Program would result in the fallowing of agricultural fields, crop conversion, or conversion of irrigation systems as a means of reducing water consumption which could result in direct conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Impacts would be Class II, *significant but mitigable*.	**AG-1** Sending sites participating in the Agricultural Offset Program shall be consistent with the following: a. Prime Farmland, Farmland of Statewide Importance, and Unique Farmland shall not be fallowed as a means of providing water offset credits. b. Changes in irrigation type/method and conversions of crops on agricultural lands designated as Prime Farmland must remain consistent with criteria for Prime Farmland as defined by the Department of Conservation FMMP. To be classified as Prime Farmland land must have been irrigated for the production of irrigated crops at some time during the two update cycles, or the last four years prior to the mapping date. c. Changes in irrigation type/method and conversions of crops on agricultural lands designated as Farmland of Statewide Importance must remain consistent with criteria for Farmland of Statewide Importance or Prime Farmland as defined by the Department of Conservation FMMP. To be classified as Farmland of Statewide Importance land must have been irrigated for the production of irrigated crops at some time during the two update cycles, or the last four years, prior to the mapping date. d. Changes in irrigation type/method and conversions of crops on agricultural lands designated as Unique Farmland must remain consistent with criteria for Unique Farmland, Farmland of Statewide Importance or Prime Farmland as defined by the Department of Conservation FMMP. To be classified as Unique Farmland land must have been used for the production of specific high economic value crops at some time during the two update cycles, or the last four years, prior to the mapping date.	Less than significant.

Table ES-1
Summary of Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Residual Impact
Impact AG-2 Implementation of the proposed Countywide Water Conservation Program would not result in a net decrease in the amount of designated agricultural land in the county, as represented by the Agricultural Resource and Agriculture, Watershed, and Open Space designations on the current San Luis Obispo County General Plan Land Use Map or conflict with existing zoning for agricultural use. Impacts would be considered Class III, *less than significant*.	No mitigation measures are necessary.	Less than significant.
Impact AG-3 Implementation of the Countywide Water Conservation Program could result in the fallowing of lands under Williamson Act contract and conflict with the provisions of Williamson Act contracts. Impacts are Class II, *significant but mitigable*.	**AG-3** The following provision shall be added to the proposed Agricultural Offset program: Sending sites providing planting credits shall remain consistent with the provisions of any existing Williamson Act contract for the property and County Of San Luis Obispo Rules Of Procedure To Implement The California Land Conservation Act Of 1965.	Less than significant.
LAND USE		
Impact LU-1 The proposed Countywide Water Conservation Program would be potentially consistent with applicable policies of the County of San Luis Obispo General Plan or other applicable planning documents. Though potential minor inconsistencies with aspects of some policies could occur, feasible mitigation measures to address these impacts have been required and are detailed in Section 4.1 of this SEIR.	Mitigation measures outlined in Section 4.1 would address minor potential inconsistencies with applicable policies included in the adopted General Plan. No further mitigation measures would be required.	

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