



COUNTY OF SAN LUIS OBISPO
Department of Agriculture/Measurement Standards

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DATE: January 29, 2009
TO: Mark Hutchinson, Project Manager
FROM: Lynda L. Auchinachie, Agriculture Department
SUBJECT: Los Osos Wastewater Project Draft Environmental Impact Report

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR). The following comments are based on current departmental policy to conserve agriculture resources and to provide for public health, safety and welfare while mitigating negative impacts of development to agriculture.

Agricultural Resources

The Agriculture Department generally agrees with the DEIR conclusion that the impacts to identified agricultural resources is a significant and unavoidable impact for all four proposed projects and that mitigation for the loss of agricultural resources is appropriate. However, based on the information provided in the DEIR it is not clear that the least amount of prime soil possible would be converted or there is no other feasible site that is not under a Williamson Act contract. The following issues should be addressed to clarify that the project has been designed to avoid/minimize impacts to prime soil, be consistent with land use policies protecting agricultural resources, and meet the Williamson Act contract termination requirements of Government Code Section 51292 (a)(b).

- The total acreage of converted agricultural land is not clear for each proposed project. For example, the expanded land use and planning analysis section (Appendix C) indicates that the combined project effects for proposed project 4 would encompass approximately 207 acres. Figure 2-8 of the project description data (Appendix B) shows that the project is all contained within the 175 acre sprayfield area identified for each proposed project. A chart identifying specific project component related impacts to agricultural resources would be helpful to better understand direct and indirect impacts to both prime and non-prime soil, particularly for the Branin, Giacomazzi and Cemetery properties that consist primarily of non-prime soil (Appendix M). Additionally, this information is important to ensure appropriate mitigation.
- The DEIR indicates that it is possible to locate the sprayfield on the parcel south of the Tonini site that consists of both prime and non-prime soils. The DEIR also indicates that locating the sprayfield on this property would result in the direct impact to approximately 106 acres of prime soil and the indirect impact to an additional 75 acres of prime soil, for a total of 181 acres. The DEIR did not include a site plan for the

specific location of the sprayfield, however, it appears that the impacts to prime soil may be overstated as most if not all of the 75 acres identified as indirectly impacted could continue in agricultural production based on acreage, resources, and land use compatibility. Therefore, the area suitable for continued agricultural production should not be considered impacted by the sprayfield or included as part of the impacted prime soil acreage total. The continuation of agricultural uses is also proposed on the Tonini site for areas not directly impacted by the project.

It appears the property south of Tonini is not under Williamson Act contract and could be a feasible alternative location for a sprayfield that results in fewer impacts to prime soil compared to the Tonini site. What would the total loss of prime soil be for each proposed project if the required sprayfield was located on the property south of Tonini?

- The DEIR identifies that a 175 acre sprayfield is required to dispose of 842 AFY of effluent for each of the four proposed projects. This sprayfield is the project component that would result in the largest conversion of prime soil. It appears the area identified for the sprayfield generally consists of prime soil with a very slow permeability rate. The DEIR did not include detailed evaluation of alternative sites with non-prime soil and/or greater permeability for sprayfield use (Appendix D- Cleath memos). Such sites may reduce the acreage necessary for a sprayfield. A thorough evaluation of alternative sprayfield locations should be included to determine if there could be a reduction in the amount of prime soil converted. The Natural Resources Conservation Service (NRCS) saturated hydraulic conductivity (Ksat) rating, available on the NRCS Web Soil Survey site, may be useful in evaluating alternative locations for a sprayfield such as a combination of the Cemetery, Andre and Robbins sites.
- The Broderson leachfield will accommodate approximately 448 AFY of effluent using only 8 acres of an 81 acre site with several constraints. The DEIR did not identify other potential leachfield locations within the dune sands and/or other areas that have been evaluated for the current proposal. Is an additional leachfield possible? Could such a leachfield reduce or eliminate the acreage necessary for the proposed sprayfield thus reducing conversion of agricultural land including prime soil?
- Proposed project 4 has been identified as the environmentally superior alternative for a variety of reasons including the conversion of only one agricultural parcel to a public purpose has the lowest loss of potential agricultural revenue to the local economy. This analysis/conclusion is difficult to understand as there is not a resource justification that is typically associated with determining an environmentally superior alternative. Perhaps a more appropriate threshold for determining an environmentally superior alternative would be based on agricultural resources/land use policies. An example could be the project that would result in the least impacts to agricultural land, particularly prime soil as required by coastal land use policies.

If you have any question, I can be reached at 781.5914.