SECTION 4.9
AGRICULTURAL RESOURCES

This section provides a background discussion of the regulatory framework and the affected environment. The regulatory framework discusses the federal, state, and local regulations. The affected environment discussion focuses on the existing activities, important farmlands categories, zoning, agricultural soil classifications, Imperial County agricultural conversion, on-site soils, and Williamson Act lands.

This section also discloses the potential impacts on agricultural resources associated with the implementation of the proposed Project. Existing environmental conditions in the affected areas are addressed, environmental impacts are analyzed, and mitigation measures are identified to reduce or avoid adverse impacts to agricultural resources.

This section is based on the following resources: the Imperial County General Plan Agricultural Element (2015); soil classifications designated by the United States Department of Agriculture's (USDA) Natural Resources Conservation Service's (NRCS) Web Soil Survey (WSS); 2016 California Department of Conservation (DOC) Farmland Monitoring and Mapping Program (FMMP) data and guidance; and the *Land Evaluation and Site Assessment Analysis for the Drew Solar Project, Imperial County, California* (RECON 2018c). The Land Evaluation and Site Assessment (LESA) Analysis is provided on the attached CD of Technical Appendices as **Appendix H** of this EIR.

The worst-case scenario consists of the Full Build-out Scenario as it would result in the temporary conversion of the greatest amount of land in the shortest amount of time.

4.9.1 REGULATORY FRAMEWORK

A. FEDERAL

Farmland Protection Policy Act (FPPA)

The Farmland Protection Policy Act is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It assures that—to the extent possible—federal programs are administered to be compatible with state, local units of government, and private programs and policies to protect farmland. The FPPA is overseen by the U.S. Department of Agriculture's Natural Resources Conservation Service.

B. STATE

California Land Conservation Act

The Williamson Act (California Land Conservation Act, California Government Code, Section 51200 et. seq.) is a statewide mechanism for the preservation of agricultural land and open space land. The Act provides a comprehensive method for local governments to protect farmland and open space by allowing lands in agricultural use to be placed under contract (agricultural preserve) between a local government and a landowner. Amendments to the Budget Act of 2009 reduced the Williamson Act subvention payments budget to $1,000, essentially suspending the subvention payments to the Counties.

Land under a Williamson Act Contract can be in either a renewal status or a non-renewal status. Non-renewal and cancellation lands are candidates for potential urbanization within a period of ten years. The requirements necessary for cancellation of land conservation contracts are outlined in Government Code Section 51282. The County must document the justification for the cancellation through a set of findings. Unless the land is covered by a Farmland Security Zone (FSZ) contract, the Williamson Act requires that local agencies make both the Consistency with the Williamson Act and Public Interest findings.

4.9 AGRICULTURAL RESOURCES

On February 23, 2010, the Imperial County Board of Supervisors voted to not accept any new Williamson Act contracts and not to renew existing contracts, due to the elimination of the subvention funding from the state budget. Effective January 01, 2011 non-renewal was filed either by the landowner or the County for all Williamson Act contracts in Imperial County (DOC 2016a). All Williamson Act contracts in Imperial County will terminate on or before December 31, 2018.

None of the Project site parcels are currently under Williamson Act contracts. There are currently nine parcels (051-380-033-000, 051-380-032-000, 052-170-001-000, 052-170-072-000, 052-170-073-000, 052-170-076-000, 052-170-078-000, 052-170-035-000, and 051-390-023-000) within the surrounding vicinity under Williamson Act contracts, all of which are in involuntary non-renewal status with the contracts expiring by December 31, 2018 (Luna 2018). Therefore, conversion of land under Williamson Act Contract on the Project site (inclusive of the Solar Energy Generation Component and Energy Storage Component) is not an issue and will not be discussed in the analysis of impacts.

California Department of Conservation Guidance

The DOC Division of Land Resource Protection prepared a letter providing guidance regarding the potential impacts of solar projects on agricultural land and resources. The DOC "considers the construction of a solar facility that removes and replaces agriculture on agricultural lands to have a significant impact on those agricultural lands…While solar panels may be an allowed use under the county zoning and General Plan, they can and should be considered an impact under CEQA to the Project site's agricultural resources" (DOC 2010).

The letter goes on to state that "Although direct conversion of agricultural land is often an unavoidable impact under the California Environmental Quality Act (CEQA) analysis, mitigation measures must be considered…However, reduction to a level below significance is not a criterion for mitigation. Rather, the criterion is feasible mitigation that lessens a project's impacts. Pursuant to CEQA Guideline Section 15370, mitigation includes measures that "avoid, minimize, rectify, reduce or eliminate, or compensate" for the impact. All measures allegedly feasible should be included in the DEIR. Each measure should be discussed, as well as the reasoning for selection or rejection. A measure brought to that attention of the Lead Agency should not be left out unless it is infeasible based on its elements. Finally, when presenting mitigation measures in the DEIR, it is important to note that mitigation should be specific, measurable actions that allow monitoring to ensure their implementation and evaluation of success. A mitigation consisting only of a statement of intention or an unspecified future action may not be adequate pursuant to CEQA."

The DOC letter also identified project impacts on agricultural land as follows:

> *When determining the agricultural value of the land, the value of a property may have been reduced over the years due to inactivity, but it does not mean that there is no longer any agricultural value. The inability to farm the land, rather than the choice not to do so, is what could constitute a reduced agricultural value. The Division recommends the following discussion under the Agricultural Resources section of the Draft EIR:*
>
> - *Type, amount, and location of farmland (Prime, Unique, and Farmland of Statewide Importance) conversion that may result directly and indirectly from project implementation and growth inducement, respectively.*
> - *Impacts on current and future agricultural operations; e.g., land-use conflicts, increases in land values and taxes, etc.*

- *Incremental project impacts leading to cumulative impacts on agricultural land. This would include impacts from uses allowed with the proposed solar facility, as well as impacts from past, current and likely projects in the future.*

Under California Code of Regulations Section 15064.7, impacts on agricultural resources may also be both quantified and qualified by use of established thresholds of significance. As such, the Division has developed a California version of the USDA Land Evaluation and Site Assessment (LESA) Model. The California LESA model is a semi-quantitative rating system for establishing the environmental significance of project-specific impacts on farmland. The model may also be used to rate the relative value of alternative Project sites.

The DOC letter also identified solar facility mitigations and Reclamation Plan to address temporary displacement of agricultural resources. Specific to these issues, the DOC letter states:

If the solar facility is considered a temporary displacement of agricultural resources, then there should be some assurances that it will be temporary and will be removed in the future. Hence the need for a reclamation plan. The loss of agricultural land (even temporary) represents a reduction in the State's agricultural land resources. The Division has witnessed the negative impacts of non-operational wind power generation facilities and related equipment that have been left to deteriorate on agricultural land. For that reason, the Division offers a variety of permitting conditions the County might use for energy projects on agricultural land:

- *Require a reclamation plan suited for solar facilities, based on the principles of the Surface Mining and Reclamation Act (SMARA). As part of this plan, a performance bond or other similar measures may be used.*
- *A typical requirement would be for the soil to be restored to the same condition it was in prior to the solar facility's construction (i.e. pre-Project soil conditions). Whatever project-related material have been brought in, or changes made to the land (i.e. graveling, roads, compaction, equipment), would be removed once the solar facility (or portions of) is on longer active.*
- *Solar project are generally considered to be "temporary." The County could require that a new permit must be applied for after a certain period of time. Because this is a new and unprecedented use of agricultural land, this would allow the county more flexibility in determining what conditional uses or conditions may be most appropriate in the longer term.*
- *Require permanent agricultural conservation easements of land of at least equal quality and size as partial compensation for the direct loss of agricultural land.*
- *Conservation easements will protect a portion of those remaining agricultural land resources and lessen project impacts in accordance with California Environmental Quality Act (CEQ Guidelines Section 15370. The Department highlight this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows and established rationale similar to that of wildlife habitat mitigation.*

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The proposed conversion of agricultural land

should be deemed an impact of at least regional significance. Hence the search for replacement lands can be conducted regionally or statewide, and need not be limited strictly to lands within the project's surround area. Mitigation for the loss of Prime Farmland is suggested at a 2:1 ratio due to its importance in the State of California. The use of conservation easements is only one form of mitigation and any other feasible mitigation measures should also be considered. Mitigations for temporary solar projects can also be flexible, especially in cases where there is a reclamation plan in place that requires the land to be returned to an agricultural state.

C. LOCAL

County of Imperial General Plan

Agriculture has been the single most important economic activity throughout the history of Imperial County. The County of Imperial General Plan Agricultural Element demonstrates the long-term commitment by the County to the full promotion, management, use, and development and protection of agricultural production (Imperial County 2015c). The Imperial County Land Use Plan designates all of the solar field site parcels as "Agriculture" (refer to Figure 4.2-1 in Section 4.2, Land Use).

The Imperial County General Plan Agricultural Element provides goals, objectives, policies and/or programs for conserving agricultural lands while minimizing or avoiding conflicts with urban and other land uses. The Agricultural Element's Preface to the Goals and Objectives states that "[These] goals and objectives, therefore are important guidelines for agricultural land use decision making. It is recognized, however, that other social, economic, environmental, and legal considerations are involved in land use decisions and that these goals and objectives, and those of other General Plan Elements, should be used as guidelines but not doctrines" (emphasis added).

The Imperial County General Plan allows the use of agricultural lands for non-agricultural uses in a number of ways. Objective 1.8 of the Agricultural Element allows conversion of agricultural land to non-agricultural uses only where a clear and immediate need can be demonstrated, based on population projections and lack of other available land (including land within incorporated cities) for such non-agricultural uses (County of Imperial 2015c, p. 30).

The Agricultural Element's Policy with regard to Preservation of Important Farmland states: "All existing agricultural land will be preserved for irrigation agriculture, livestock production, aquaculture, and other agriculture-related uses except for non-agricultural uses identified in this General Plan…." (County of Imperial 2015c, p. 39). The Program associated with this Policy provides for certain findings when land is removed from the Agricultural designation[1].

In 2015, the County adopted the General Plan's Renewable Energy and Transmission Element. The purpose of the Renewable Energy and Transmission Element is to provide a comprehensive document that contains the latest knowledge about the resources, feasible development technology, legal requirements, policies (Federal, State and County), and implementation measures. This Element provides a framework for the review and approval of renewable energy projects in the County. Section I(C) explains that the County adopted the Renewable Energy and Transmission Element after determining that the benefits of Renewable Energy development in Imperial County are:

1. Fiscal benefit of expanded property tax revenues;
2. Fiscal benefit of sales tax revenues from the purchase of equipment, goods and services;
3. Royalty and lease benefits to local landowners and County.

[1] The proposed Project will not remove agricultural land from the Agriculture designation. Instead, the proposed will temporarily convert agricultural land to a non-agricultural use for a fixed period of time as allowed with approval of CUPs.

4. Social and fiscal benefits from increased economic activity and local employment opportunities that do not threaten the economic viability of other industries;
5. Improvements in technology to reduce costs of electrical generation;
6. Reduction in potential greenhouse gases by displacing fossil-fuel-generated electricity with renewable energy power which does not add to the greenhouse effect;
7. Contribution towards meeting the State of California's Renewables Portfolio Standard (RPS); and
8. Minimization of impacts to local communities, agriculture and sensitive environmental resources (County of Imperial 2015b, p. 2).

The Project's consistency with the Renewable Energy and Transmission Element is discussed in Chapter 4.2, Land Use.

Table 4.9-1 provides a consistency analysis of Imperial County General Plan policies relating to agricultural resources applicable to the proposed Full Build-out Scenario and Phased Build-out Scenario. While this EIR analyzes the Project's consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d) and can be used as substantial evidence to support a finding of consistency required under laws other than CEQA, the Imperial County Board of Supervisors ultimately determines on balance whether the Project is consistent overall with the County's General Plan.

TABLE 4.9-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goals, Objectives and Policies	Consistent with General Plan?	Analysis
AGRICULTURAL RESOURCES ELEMENT		
Preservation of Important Farmland		
Goal 1: All Important Farmland, including the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance, as defined by Federal and State agencies, should be reserved for agricultural uses.	Yes	Based on the LESA model for the overall Project site, the Project is considered to have a potentially significant impact on agricultural resources due to the conversion of Prime Farmland and Farmland of Statewide Importance. The proposed Project would convert 48.3 acres of Prime Farmland and 714.5 acres of Farmland of Statewide Importance (**Table 4.9-4a** thru **Table 4.9-4e** and **Table 4.9-15**). However, mitigation measures MM 4.9.1a and MM 4.9.1b would reduce the impact to farmlands by preserving comparable Prime Farmland and non-Prime Farmlands while mitigation measure MM 4.9.1b directs the Applicant to prepare a Reclamation Plan to restore the affected parcels back to pre-Project soil conditions. Additionally, the Project Development Agreement provides for Agricultural Benefit payments to be paid to the County to be used to enhance and preserve agricultural productivity within the County. Therefore, the proposed Project is consistent with this goal for both the Full Build-Out Scenario and Phased CUP Scenario.

TABLE 4.9-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goals, Objectives and Policies	Consistent with General Plan?	Analysis
Objective 1.1 Maintain existing agricultural land uses outside of urbanizing areas and allow only those land uses in agricultural areas that are compatible with agricultural activities.	Yes	The IID lands on which the proposed Project is planned are designated Agriculture under the General Plan and have corresponding zoning of A-2 - General Agriculture; A-2-R - General Agriculture, Rural Zone; and A-3 - Heavy Agriculture. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as conditional uses in Agricultural zones. In complying with the zoning designations, the Applicant is seeking six Conditional Use Permits (CUPs) for the Project, as well as a height Variance and a Zone Change to the RE Overlay Zone. The proposed Project would not remove land from the Agricultural designation of the General Plan or seek a change to the underlying zoning designation. The Project site is located in an area where the County has allowed a number of similar solar energy facility uses in the immediate vicinity, and as such would minimize impacts to other sites in agricultural use around the County. Mitigation measure MM 4.9.1b directs the Applicant to prepare a Reclamation Plan to restore the affected parcels back to pre-Project soil conditions. In addition, the Project Development Agreement provides for Agricultural Benefit payments to be paid to the County to be used to enhance and preserve agricultural productivity within the County. Refer also to Section 4.2, Land Use for additional discussion of the Project's consistency with existing land uses and land use regulations. The proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.

TABLE 4.9-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goals, Objectives and Policies	Consistent with General Plan?	Analysis
Objective 1.3 Conserve Important Farmland for continued farm related (non-urban) use and development while ensuring its proper management and use.	Yes	The proposed Project conserves Important Farmland in that it does not change the existing Agricultural land use designation from Agriculture. In addition, mitigation measure MM 4.9.1b requires that the Applicant shall submit to Imperial County a Reclamation Plan to return the site to its current agricultural condition. In this way, the proposed Project ensures the long-term proper management and agricultural use of the affected parcels. Therefore, the proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.
Objective 1.4 Discourage the location of development adjacent to productive agricultural lands.	Yes	Refer to discussion under Agricultural Resources Element Objective 1.1. The proposed Project is considered consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.
Objective 1.5 Direct development to less valuable farmland (i.e., Unique Farmland and Farmland of Local Importance rather than Prime Farmland or Farmland of Statewide Importance) when conversion of agricultural land is justified.	Yes	The proposed Project would temporarily convert 714.5 acres of Farmland of Statewide Importance and 48.3 acres of Prime Farmland (**Table 4.9-4a** thru **Table 4.9-4e** and **Table 4.9-15**). Solar development is being concentrated in this portion of the County and the Applicant will be required to mitigate temporary loss of agricultural land by entering into a Development Agreement with the County which addresses the requirements of the Guidelines and the County's use of funds provided under those Guidelines. In addition, as required by mitigation measure MM 4.9.1b, the Applicant must prepare, and have approved by the County, a Reclamation Plan prior to the issuance of a grading permit for the Project. The Reclamation Plan must address restoration of the soil to pre-construction conditions as determined in part by the LESA score and provide financial security for that plan. (See Section 2.1.6). Refer to the discussion under Goal 1 and Objective 1.1. Therefore, the proposed Project is consistent with this objective on an overall, long-term basis for both the Full Build-Out Scenario and Phased CUP Scenario.

TABLE 4.9-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goals, Objectives and Policies	Consistent with General Plan?	Analysis
Objective 1.6 Recognize and preserve unincorporated areas of the County, outside of city sphere of influence areas, for irrigation agriculture, livestock production, aquaculture, and other special uses.	Yes	Refer to discussion under Agricultural Resources Element Objectives 1.1 and 1.3. The proposed Project is considered consistent with this objective. The proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.
Objective 1.8 Allow conversion of agricultural land to non-agricultural uses only where a clear and immediate need can be demonstrated, based on population projections and lack of other available land (including land within incorporated cities) for such non-agricultural uses. Such conversion shall also be allowed only where such uses have been identified for non-agricultural use in a city general plan or the County General Plan, and are supported by a study to show a lack of alternative sites.	Yes	The proposed Project involves the temporary conversion of agricultural land to a solar energy generation facility which is an allowed use on land designated as Agriculture with approval of a CUP. The clear and immediate need for the proposed Project is described in Section 2.1.2 of the Project Description. For example, the proposed Project would provide a new source of renewable energy to assist the State of California in achieving and exceeding the RPS while also expanding the renewable energy sector in the County's economy. The Project would assist with meeting existing demand as well as future electricity demand associated with planned population growth in the County and State. Further, the energy storage component portion of the Project would increase stability of energy supply. As noted above, the Project site is located in an area where similar solar energy facilities are clustered and have been approved by the County. Other off-site alternatives were also considered but rejected as in feasible (Refer to Chapter 5.0 Alternatives). Therefore, the proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.

TABLE 4.9-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goals, Objectives and Policies	Consistent with General Plan?	Analysis
Objective 1.9 Preserve major areas of Class II and III soils which are currently nonirrigated but which offer significant potential when water is made available.	Yes	The proposed Solar Field Site Parcels are located on IID-owned land and are served by IID infrastructure and in line with the coordinated land use/water supply strategy. The Project site is currently irrigated and in active agricultural use for flat crops. At the end of the operation of each CUP, the Project is required to be decommissioned and returned to its existing farmland status, during which time the irrigation potential would be preserved. The proposed Project would preserve on-site Class II and III soils, and would not result in a change to other Class II and III soils. Therefore, the Project is considered consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.
Objective 1.10 Hazard-prone areas such as earthquake faults and aircraft impact zones should remain designated for agricultural uses.	Yes	The Project does not propose to change the zoning of the Project site which will remain zoned for agricultural uses. The Project will also be designed in accordance with applicable standards to reduce seismic damage. No habitable structures are proposed as part of the Project. Therefore, the proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.
Objective 1.11 Control and prevent soil erosion when possible.	Yes	Potential for erosion is typically greatest during construction when soils are disturbed and exposed. The Applicant will implement appropriate fugitive dust control measures consistent with applicable ICAPCD requirements as well as a Construction General Permit and Stormwater Pollution Prevention Plan (Section 4.11, Hydrology and Water Quality), and County site design and retention requirements to control and prevent erosion. Therefore, the proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.

TABLE 4.9-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goals, Objectives and Policies	Consistent with General Plan?	Analysis
Development Patterns and Locations on Agricultural Land		
Goal 2: Adopt policies that prohibit "leapfrogging" or "checkerboard" patterns of non-agricultural development in agricultural areas and confine future urbanization to adopted Sphere of Influence areas.	Yes	The proposed Project support's the County's position regarding "leapfrogging" and "checkerboard" development patterns. The Project is proposed in an area of the County that currently contains solar development that is outside the Sphere of Influence of County cities. The proposed Project is located away from other non-solar uses and provides for on-site water and sewer infrastructure to serve only that facility; therefore, there will be no new infrastructure which would encourage development of non-solar urban uses. Therefore, the proposed Project is consistent with this goal for both the Full Build-Out Scenario and Phased CUP Scenario. Refer the analysis under Objective 1.1 above and Objective 2.1, below.
Objective 2.1 Do not allow the placement of new non-agricultural land uses such that agricultural fields or parcels become isolated or more difficult to economically and conveniently farm.	Yes	The proposed Project would not isolate or restrict access to surrounding agricultural lands because it is part of a pattern of industrial development in this focused area of the County. The DOC has stated, "[b]ecause the County has concentrated solar facility development in the area, the Project site is almost entirely surrounded by solar facilities in various states of completion. The Department believes that based on the County's decision to focus solar development in the area, which the Department recognizes as an industrial use of the land, the proposed project will not result in discontiguous patterns of urban development" (DOC 2010). Furthermore, the Project is subject to the County's Right to Farm Ordinance to insure that it does not have impacts on any neighboring farm operations. (Refer also to analysis under Goal 6, below) Finally, the Project features include allowing farming to continue in the CUP Areas until there is a need for that particular CUP Area to be developed for solar energy generation. The proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.

TABLE 4.9-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goals, Objectives and Policies	Consistent with General Plan?	Analysis
Objective 2.3 Maintain agricultural lands in parcel size configurations that help assure that viable farming units are retained.	Yes	While the proposed Project would alter the legal boundaries of one parcel, it does so only to make it consistent with the boundaries of parcels that are currently being farmed and does not otherwise change the size of any of the Solar Field Site Parcels proposed for development. The farmed areas and configuration would remain unchanged thereby facilitating reclamation to pre-Project conditions to support farming. Therefore, the proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.
Objective 2.4 Discourage the parcelization of large holdings.	Yes	The proposed Project involves approximately 855 gross acres of land (inclusive of roadways and canals). However the Project does not involve any change in the size of the existing parcels on which the CUPs are proposed. Therefore, the proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.
Objective 2.6 Discourage the development of new residential or other non-agricultural areas outside of city "spheres of influence" unless designated for non-agricultural use on the County General Plan, or for necessary public facilities.	Yes	Refer to discussion under Goal 1, and Chapter 4.9, Land Use. The proposed Project is consistent with this objective for both the Full Build-Out Scenario and Phased CUP Scenario.
Preservation of Important Farmland Policy		
Policy: The overall economy of Imperial County is expected to be dependent upon the agricultural industry for the foreseeable future. As such, all agricultural land in Imperial	Yes	Refer to discussion under Goal 1, and Objectives 1.1, 1.8 and 2.1. The proposed Project is consistent with this Policy for both the Full Build-Out Scenario and Phased CUP Scenario. Refer also to Chapter 4.9, Land Use.

TABLE 4.9-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goals, Objectives and Policies	Consistent with General Plan?	Analysis
County is considered as Important Farmland, as defined by Federal and State agencies, and should be reserved for agricultural uses. Agricultural land may be converted to non-agricultural uses only where a clear and immediate need can be demonstrated, such as requirements for urban housing, commercial facilities, or employment opportunities. All existing agricultural land will be preserved for irrigation agriculture, livestock production, aquaculture, and other agriculture-related uses except for non-agricultural uses identified in this General Plan or in previously adopted City General Plans.		
Agricultural and Non-Agricultural Land Use Relations		
Goal 3: Goal 3: Limit the introduction of conflicting uses into farming areas, including residential development of existing parcels which may create the potential for conflict with continued agricultural use of adjacent property.	Yes	Refer to discussion under Goal 1, and Objectives 1.1, 1.8 and 2.1. Refer also to Chapter 4.9, Land Use. The Project will not adversely impact agricultural operations. This analysis includes mitigation measures that will reduce the Project's potentially significant impacts to less than significant levels. The proposed Project is consistent with this goal for both the Full Build-Out Scenario and Phased CUP Scenario.

Imperial County Zoning Ordinance

Imperial County's Zoning Ordinance establishes land use zones and regulations for the use of land and buildings in the unincorporated areas of the County. The Zoning Ordinance is an implementation of the County's General Plan and provides more specific requirements than are provided in the General Plan. As depicted in Figure 4.2-2 in Section 4.2, Land Use, lands on which the Drew Solar Project is proposed are currently zoned A-2 (General Agricultural Zone), A-2-R (General Agricultural Zone/Rural Zone), and A-3 (Heavy Agricultural).

County of Imperial Right to Farm Ordinance No. 1031

The County of Imperial Right to Farm Ordinance (No. 1031) was approved by the County Board of Supervisors on August 7, 1990. The purpose and intent of the Ordinance is to reduce the loss to the County of its agricultural resources by clarifying the circumstances under which agricultural operations may be considered a nuisance. The Ordinance permits operation of properly conducted agricultural operations within the County. The Ordinance promotes a good neighbor policy by disclosing to purchasers and users of adjacent properties the potential problems and inconveniences associated with agricultural operations. The solar field site parcels and surrounding properties are currently used for agricultural operations and similar solar energy generating facilities.

County of Imperial Resolution 2012-005

In 2012, the Board of Supervisors adopted Resolution 2012-005 establishing "Guidelines for the Public Benefit Program for Use with Solar Power Plants in Imperial County". The Resolution states that solar energy projects may not create the economic advantages or permanent employment opportunities that other development could offer and that in meeting the state's renewable energy goals, it did not want to accomplish the goal at the expense of its residents because solar power plants commit areas to energy production that may preclude all other potential uses, including agricultural and open spaces uses. The Resolution further states that the Board of Supervisors held public scoping meetings, public hearings and formed a committee that provided input on a Public Benefit Program that was designed to address concerns expressed by the local community and others related to negative effects of these projects, particularly the loss of agricultural jobs. Finally, it found that utility-scale solar developers who voluntarily participated in the Public Benefit Program would "properly address the concerns of the community." The Agricultural Benefit Fee, Community Benefit Fee and Sales Tax Benefits will be confirmed and made enforceable pursuant to a Development Agreement between the County and the Applicant.

Subject to the specific terms of the Development Agreement, and in accordance with Guidelines for the Public Benefit Program for Use with Solar Power Plants in Imperial County, the Applicant shall pay on a per acre basis a separate fee for farmland for each acre temporarily converted: (1) an agricultural benefit fee for prime farmland and as separate fee for of farmland of statewide importance; and (2) a Project land community benefit fee. Such fees shall be no less than those set out in Resolution 2012-05, plus all applicable consumer price index and other increases. There shall be a minimum sales tax guarantee as well.

Development Agreement

The Development Agreement may provide that the Applicant may earn credits against these benefit fees for replacement benefits to the community in the form of local hiring, veteran hiring, contracts with local vendors, payments to scholarship programs, or crop yield enhancement projects, and similar demonstrated community benefits.

Conditions of Approval

Additional fees shall be provided in the Conditions of Approval, including but not limited to an emergency services benefit fee of:

a) Permittee shall pay a fee of $50 per acre per year prior to commencement of the construction period to address the Imperial County Fire/OES expenses for service calls within the Project's Utility/Transmission area. Said amount shall be prorated on a monthly basis for periods of time less than a full year. Permittee shall provide advance, written notice to County Executive Office of the construction schedule and all revisions thereto.

b) Permittee shall pay an annual fee of $20 per acre per year during the post-construction, operational phase of the Project to address the Imperial County Fire/OES expenses for service calls within the Project's Utility/Transmission area. Said fee will be paid to the Fire Department to cover on-going maintenance and operations costs created by the project.

c) (applies to a & b) Costs associated with items two above items shall be annually adjusted on January 1st to add a CPI (Los Angeles) increase. Such costs associated with these items can be readjusted in the County's sole discretion if a new 1service analysis is prepared and that service analysis is approved by both the County and the Permittee.

d) Fiscal impacts will remain open until meeting the department head(s) and developer(s), which may include but not limited to: Capital purchases which may be required to assist in servicing this project; costs for services during construction and life of the project; and training.

Use of Mitigation Fees

Imperial County Resolution 2012-005 requires mitigation fees be allocated for the stewardship, protection and enhancement of agricultural lands within the County:

The Agricultural Business Development Category, such as funding for agricultural commodity processing plants and energy plants that use agricultural products, which was identified as the greatest job creator category would receive 50 percent of the funds.

The Research & Development Category, such as funding for development of new high-yield or water-efficient crops, new water conservation techniques, new technology to improve yields in existing crops, and partial funding for an endowment to support an agricultural research specialist, would receive 20% of the funds. Improved water conservation and efficient crop production keeps more farmland in production during drought cycles therefore supports job creation and maintenance;

The Agricultural Stewardship Category, such as programs that bring fields back into production, implement soil reclamation, and improve existing fields to improve crop yields, would receive 20%. Increase production of crops again leads to more agricultural jobs to prepare and harvest the fields; and

The Education/Scholarship Category, such as matching funds for scholarships awarded by agricultural organizations for agricultural studies, student loans, Future Farmers of America and 4-H loans, would receive 10 percent. Training the next generation of farmers to continue and expand farming operations will also support agricultural job creation.

County of Imperial Williamson Act Rules and Procedures

In 2000, the Imperial County Board of Supervisors adopted the Williamson Act and the provisions established by California Revenue and Taxation Code Section 423.3. The Board of Supervisors also adopted Resolution 200-084, which established the County of Imperial Rules of Procedure to Implement the California Land Conservation Act of 1965 (Rules). The Rules set forth eligibility criteria and standards for the establishment of an agricultural preserve, expansion of an agricultural preserve, and removal of land from an agricultural preserve. The Rules also establish requirements for Land Conservation Contracts and local monitoring requirements.

As discussed above, on February 23, 2010, the Imperial County Board of Supervisors voted to not accept any new Williamson Act contracts and not to renew existing contracts, due to the elimination of the subvention funding from the state budget. The County reaffirmed this decision in a vote on October 12, 2010, and notices of nonrenewal were sent to landowners with Williamson Act contracts following that vote. The applicable deadlines for challenging the County's actions have expired, and therefore all Williamson Act contracts in Imperial County will terminate on or before December 31, 2018.

Effective January 01, 2011 non-renewal was filed either by the landowner or the County for all Williamson Act contracts in Imperial County (DOC 2016a).

4.9.2 ENVIRONMENTAL SETTING

A. REGIONAL SETTING

Imperial County covers an area of 4,597 square miles or 2,942,080 acres. Agricultural production has been the major economic industry in Imperial County since the 1900s. Several factors including climate, fertile soils, and the irrigation water have led to Imperial County's agricultural productivity. Imperial County also has come to be recognized as a significant area for development of alternative energy facilities, including solar, wind and geothermal energy. For the same reasons that support agriculture (sun almost 365 days/year) solar energy development has increased at the same time as there have been economic challenges to agricultural production and changes in water availability and cost.

Several factors have significantly altered the agricultural conditions in the County. In the past several years, there has been an increase in utility scale solar development in the County driven by California's RPS. Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107, expanded in 2011 under Senate Bill 2(1x), and enhanced in 2015 by Senate Bill 350, California's RPS is one of the most ambitious renewable energy standards in the country. The RPS program requires investor-owned utilities, publicly owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 50 percent of total procurement by 2030 (CPUC 2018). The County has allowed solar development to become part of the Imperial Valley landscape.

B. PROJECT SITE

The Project site is approximately 844.2 gross-acres (855 gross acres when parcel map records) and 762.8 net farmable-acres and is comprised of six parcels: Assessor's Parcel Numbers 052-170-031, 052-170-032, 052-170- 037, 052-170-039, 052-170-056, and 052-170-067. The Project site is bounded by Kubler Road to the north, Westside Main Canal and Wormwood Canal to the west, State Route 98 (SR 98) to the south, and Pulliam Road to the east. Agricultural uses are located on the Project site and properties to the north, west, and southwest. Solar generation facilities are located on properties to the east and south of the Project site.

According to the LESA Analysis prepared for the Project, the Project site has historically been, and is currently used, for agricultural production. Crops grown on the Project site during the last three years include Bermuda grass, Alfalfa (*Medicago sativa*), kleingrass (*Panicum coloratum*), Wheat, and Sudangrass. The site is currently used for production of Bermuda grass (RECON 2018c).

Important Farmlands

Farmland Mapping and Monitoring Program (FMMP)

The DOC Farmland Mapping and Monitoring Program (FMMP) produces Important Farmland Maps which document resource quality and land use information. USDA Soil Survey information and the corresponding Important Farmland candidacy recommendations are used for assessing local land.

The FMMP is intended to assist decision-makers in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. According to the 2016 FMMP Map of Imperial County Important Farmland, the Project site contains land designated as Prime Farmland and Farmland of Statewide Importance. The DOC definitions of each Important Farmland category (as noted on the 2016 FMMP Map of Imperial County Important Farmland) are provided below along with the CUP areas that contain these various categories.

Prime Farmland

Prime Farmland has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. The Project site includes 48.3 acres of Prime Farmland (refer to **Table 4.9-4a** thru **Table 4.9-4e**, below).

Farmland of Statewide Importance

Farmland of Statewide Importance is similar to prime farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. The Project site includes 714.5 acres of Farmland of Statewide Importance (refer to **Table 4.9-4a** thru **Table 4.9-4e**, below).

Unique Farmland

Unique Farmland consists of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. The Project site does not include areas designated as Unique Farmland.

Farmland of Local Importance

Farmland of Local Importance consists of unirrigated and uncultivated lands with prime and statewide soils. The Project site does not include areas designated as Farmland of Local Importance.

Urban and Built-Up Land

Urban and Built-up Land is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures. The Project site does not include areas designated as Urban and Built-Up Land.

Other Land

Other Land is land not included in any other mapping category. Common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres. Vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as other land. The Project site or does not include areas designated as Other Land.

Imperial County Important Farmlands and Conversion of Farmlands

Table 4.9-2 depicts the conversions of agricultural land to non-agricultural uses within Imperial County from 2014-2016. As depicted in this table, the 2016 inventory of important farmlands included 190,589 acres of Prime Farmland, 297,558 acres of Statewide Importance, 1,971 of Unique Farmland, and 40,403 acres of Farmland of Local Importance (DOC 2016b).

TABLE 4.9-2
IMPERIAL COUNTY CHANGE IN AGRICULTURAL LAND USE SUMMARY (2014 – 2016)

Land Use Category	Total Acreage Inventoried		2014 - 2016 Acreage Conversion			
	2014	2016	Lost (-)	Gained (+)	Total Acreage Changed	Net Acreage Changed
Prime Farmland	190,589	190,205	714	330	1,044	-384
Farmland of Statewide Importance	297,558	297,272	1,143	857	2,000	-286
Unique Farmland	1,971	2,070	18	117	135	99
Farmland of Local Importance	40,403	38,924	2,682	1,203	3,885	-1,479
Important Farmland Subtotal	**530,521**	**528,471**	**4,557**	**2,507**	**7,064**	**-2,050**
Grazing Land	0	0	0	0	0	0
Agricultural Land Subtotal	530,521	528,471	4,557	2,507	7,064	-2,050
Urban and Built-Up Land	35,590	37,413	173	1,996	2,169	1,823
Other Land	461,665	461,892	260	487	747	227
Water Area	749	749	0	0	0	0
Total Area Inventoried	**1,028,525**	**1,028,525**	**4,990**	**4,990**	**9,980**	**0**

Source: DOC 2016b.

As shown in **Table 4.9-2**, there was a net loss of 2,050 acres of Important Farmlands in Imperial County from 2014-2016. Farmland conversions occurred for a variety of reasons, including conversion to solar uses, fallowing of lands resulting in a conversion to a non-irrigated classification, and expansion of urban development. The trend in the conversion of agricultural land is expected to continue due to development pressure and other factors (DOC 2016b).

C. SOLAR ENERGY GENERATION COMPONENT AND ENERGY STORAGE COMPONENT

Existing Uses

The Project site (inclusive of the Solar Energy Generation Component and Energy Storage Component) consist of 762.8 acres of farmland that comprise the Full Build-out Scenario and Phased CUP Scenario (CUPs 17-0031, 17-0032, 17-0033, 17-0034, 17-0035 and 18-0001) proposed as part of the Phased CUP Scenario. These fields are currently in agricultural production.

Important Farmland Categories

Full Build-out Scenario

Figure 4.9-1 depicts the Important Farmlands Classifications on the Project site. **Table 4.9-3** summarizes the total important farmland acreage within the Project site under the Full Build-out Scenario. As shown, the majority of the land within the Project site is designated Farmland of Statewide Importance (714.5 acres) and a portion is designated as Prime Farmland (48.3 acres).

TABLE 4.9-3
SUMMARY OF IMPORTANT FARMLAND PROJECT SITE /ALL CUPS

FMMP Category	Total Acres	Percent Total
Prime Farmland	48.3	6.3%
Farmland of Statewide Importance	714.5	93.7

Total	**762.8**	**100%**

Source: RECON 2018c.

Phased CUP Scenario

Table 4.9-4a thru **Table 4.9-4f**, below, provide the approximate acreages of Important Farmland Classifications on each CUP area.

CUP#17-0031 / Phase 1

Table 4.9-4a summarizes the important farmland acreage within CUP#17-0031. As shown, the majority of the land within CUP#17-0031 is designated Farmland of Statewide Importance (152.8 acres). The remainder of CUP#17-0031 is designated as Prime Farmland (2.7 acres).

TABLE 4.9-4A
IMPORTANT FARMLANDS ON CUP#17-0031

Agriculture Classification	Approximate Acreage on CUP Area
Prime Farmland	2.7
Farmland of Local Importance	0.0
Farmland of Statewide Importance	155.2
Unique Farmland	0.0
Subtotal Important Farmlands	*157.9*
Other Land	0.0
Total	**157.9**

Source: RECON 2018c.

CUP#17-0032 / Phase 2

Table 4.9-4b summarizes the important farmland acreage within CUP#17-0032. As shown, all of the land within CUP#17-0032 is designated Farmland of Statewide Importance (161.3 acres).

TABLE 4.9-4B
IMPORTANT FARMLANDS ON CUP#17-0032

Agriculture Classification	Approximate Acreage on CUP Area
Prime Farmland	0.0
Farmland of Local Importance	0.0
Farmland of Statewide Importance	158.6
Unique Farmland	0.0
Subtotal Important Farmlands	*158.6*
Other Land	0.0
Total	**158.6**

Source: RECON 2018c.

CUP#17-0033 / Phase 3

Table 4.9-4c summarizes the important farmland acreage within CUP#17-0033. As shown, all of the land within CUP#17-0033 is designated Farmland of Statewide Importance (154.9 acres).

TABLE 4.9-4C
IMPORTANT FARMLANDS ON CUP#17-0033

Agriculture Classification	Approximate Acreage on CUP Area
Prime Farmland	0.0

Farmland of Local Importance	0.0
Farmland of Statewide Importance	152.2
Unique Farmland	0.0
Subtotal Important Farmlands	*152.2*
Other Land	0.0
Total	**152.2**

Source: RECON 2018c.

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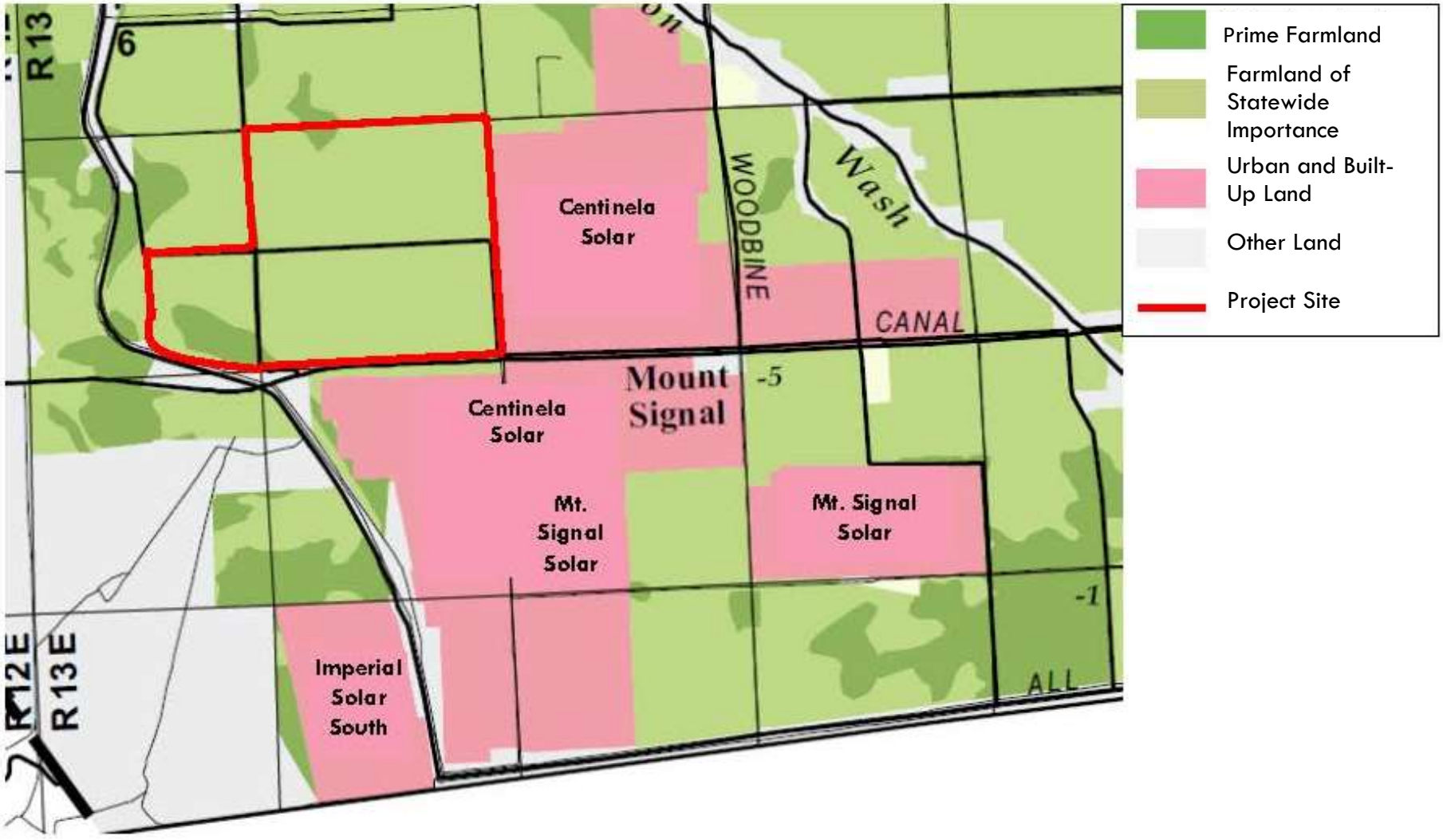


Source: DOC 2017.

FIGURE 4.9-1
MAP OF IMPORTANT FARMLAND

CUP#17-0034 / Phase 4

Table 4.9-4d summarizes the important farmland acreage within CUP#17-0034. As shown, the majority of the land within CUP#17-0034 is designated Farmland of Statewide Importance (151.9 acres). The remainder of CUP#17-0034 is designated as Prime Farmland (6.1 acres).

TABLE 4.9-4D
IMPORTANT FARMLANDS ON CUP#17-0034

Agriculture Classification	Approximate Acreage on CUP Area
Prime Farmland	6.1
Farmland of Local Importance	0.0
Farmland of Statewide Importance	151.0
Unique Farmland	0.0
Subtotal Important Farmlands	*157.1*
Other Land	0.0
Total	**157.1**

Source: RECON 2018c.

CUP#17-0035 and CUP#18-0001 / Phase 5

Table 4.9-4e summarizes the important farmland acreage within CUP#17-0035 and CUP#18-0001 (Phase 5 CUPs). As shown, the majority of the land within the Phase 5 CUPs is designated Farmland of Statewide Importance (93.7 acres). The remainder the land within the Phase 5 CUPs is designated as Prime Farmland (39.5 acres).

TABLE 4.9-4E
IMPORTANT FARMLANDS ON CUP#17-0035 AND CUP#18-0001

Agriculture Classification	Approximate Acreage on CUP Area
Prime Farmland	39.5
Farmland of Local Importance	0.0
Farmland of Statewide Importance	97.5
Unique Farmland	0.0
Subtotal Important Farmlands	*137.0*
Other Land	0.0
Total	**137.0**

Source: RECON 2018c.

Agricultural Soils Classifications

United States Department of Agriculture Soil Survey

The United States Department of Agriculture (USDA) conducted a Soil Survey for the Imperial Valley Area and published maps and guidelines to define the condition and location of various kinds of soils in the region (USDA 1981). These classes are identified in **Table 4.9-5.**

TABLE 4.9-5
SOIL CAPABILITY CLASSES - CLASS DESCRIPTION

Class	Description
I	Soils have few limitations that restrict their use.
II	Soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.
III	Soils have severe limitations that reduce the choice of plants, require special conservation practices, or both.
IV	Soils have very severe limitations that reduce the choice of plants, require very careful management, or both.
V	Soils are not likely to erode but have other limitations, impractical to remove, that limit their use largely to pasture or range, woodland, or wildlife habitat.
VI	Soils have severe limitations that make them generally unsuited to cultivation and limit their use mainly to pasture, range, forestland, or wildlife food and cover.
VII	Soils have very severe limitations that make them unsuited to cultivation and that restrict their use mainly to grazing, forestland, or wildlife.
VIII	Soils and miscellaneous areas have limitations that preclude their use for commercial plant production and limit their use to recreation, wildlife, or water supply or for aesthetic purposes.

Source: USDA 1981.

Land Evaluation and Site Assessment Evaluation

The Project site was evaluated using the California LESA Model to rate the quality and availability of agricultural resources on the Project site. Due to a history of soil compaction, the existing utility roads within the Project site are not suitable for future agricultural production. Consequently, the Land Evaluation (LE) and Site Assessment analyses exclude the existing utility roads and focus on the 762.8 net farmable-acres within the Project site (RECON 2018).

Land Evaluation Modeling

Land Capability Classification

The Land Capability Classification (LCC) Rating indicates the suitability of soils for most kinds of crops. Soils are rated from Class I to Class VIII, with soils having the fewest limitations receiving the highest rating. Class I soils have no significant limitation for raising crops. Classes VI through VIII have severe limitations, limiting or precluding their use for agriculture. Capability subclasses are also assigned by adding a small letter to the class designation. Capability subclasses include the letters "e," "w," "s," or "c." The letter "e" shows that the main limitation is risk of erosion. The letter "w" indicates that water in or on the soil interferes with plant growth or cultivation. The letter "s" indicates that the soil is limited mainly because it is shallow, droughty, or stony. Finally, the letter "c" is used only in some parts of the United States where cold or dry climates are a concern. Groupings are made according to the limitation of the soils when used to grow crops and the risk of damage to soils when they are used in agriculture (RECON 2018).

Storie Index

The Storie Index provides another mechanism for rating soils. Under the Storie Index, a numerical system is used to convey the relative degree of suitability, or value of a soil for general intensive agriculture use. The index considers a soil's color and texture, the depth of nutrients, presence of stones, and slope. All of these characteristics directly relate to the adequacy of a soil type for use in crop cultivation. The Storie Index does not consider other factors, such as the availability of water for irrigation, climate, and the distance from markets. Values of the index range from 1 to 100 and are

divided into six grades. An index of 100 and a grade of 1 is considered the most suitable farmland. Soils that have a Storie rank of 10 or below are considered to have a very low agricultural potential. Soils are considered to be prime for high quality agricultural production if their Storie Index Rating is 80 or greater. In the Imperial Valley region, the Storie Index ratings of soils range from 5 to 97. **Table 4.9-6** identifies the Storie Index classifications.

TABLE 4.9-6
STORIE INDEX RATINGS - GRADE INDEX RATING DESCRIPTION

Grade	Index Rating	Description
1	80 to 100	Few or no limitations that restrict use for crops. Excellent or well suited to general intensive farming.
2	60 to 80	Good or also well suited to general farming.
3	40 to 60	Fairly well suited to general farming.
4	20 to 40	Poorly suited to general farming.
5	10 to 20	Very poorly suited to general farming.
6	Less than 10	Not suitable for farming.

Source: USDA 1981.

On-Site Soils

Review of the U.S. Department of Agriculture Soil Survey data identified five soil types on the Project site. **Table 4.9-7** shows the calculations for the Project site's LCC and Storie Index scores, which together constitute the Project site's Land Evaluation (LE) scores. All of the Project site soils have the capability subclass "w" indicating water in or on the soil that interferes with plant growth or cultivation. Refer to Figure 4.6-3 "Soil Map" in Section 4.6 for a graphical representation of the distribution of these five soil types on the Project site.

TABLE 4.9-7
LAND CAPABILITY CLASSIFICATION AND STORIE INDEX SCORE

Soil Map Unit	Net Farmable Acres	Proportion of Project Area (Percent)	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
Holtville Silty Clay, Wet	5.8	0.8	IIw	80	0.6	30	0.2
Imperial Silty Clay, Wet	409.9	53.7	IIIw	60	32.2	22	11.8
Imperial-Glenbar Silty Clay Loams, Wet, 0 to 2 Percent Slopes	298.6	39.1	IIIw	60	23.5	34	13.3
Meloland Very Fine Sandy Loam, Wet	42.4	5.6	IIIw	60	3.3	36	2.0
Rositas Fine Sand, Wet, 0 to 2 Percent Slopes	6.0	0.8	IIIw	60	0.4	43	0.3
Total	762.8	100.0	--	**LCC Total**	60.1	**Storie Index Total**	27.7

Source: RECON 2018c.
NOTE: Totals may vary due to independent rounding.
LCC = Land Capability Classification

Site Assessment

The California LESA Model includes four Site Assessment (SA) factors that are separately rated and include the following:

- Project Size Rating;
- Water Resources Availability Rating;
- Surrounding Agricultural Land Rating; and
- Surrounding Protected Resource Land Rating (California Department of Conservation 1997)

Project Size Rating

The Project Size Rating is utilized to recognize the role that farm size plays in the viability of commercial agricultural operations. In general, larger farming operations can provide greater flexibility in farm management and marketing decisions, and can benefit from certain economies of scale for equipment and infrastructure. Additionally, larger operations tend to have greater impacts upon the local economy through direct employment, as well as impacts upon supporting industries and food processing industries (RECON 2018c).

The Project Size Rating considers both the total acreage of land and the different quality of land that comprise the operation when evaluating agricultural productivity. Lands with higher quality soils lend themselves to greater management and cropping flexibility and have the potential to provide greater economic return per unit acre. **Table 4.9-8** shows the Project Size Rating Scores the LESA Model assigns projects based on the acreage and LCC rating of soils within a Project site. As shown, the Project Size Rating divides a Project site into three acreage groupings based upon the LCC ratings that were previously determined in the LE analysis. Under the Project Size Rating, relatively fewer acres of high quality soils are required to achieve a maximum Project Size Score. Alternatively, a maximum score on lesser quality soils could also achieve a maximum Project Size Score.

TABLE 4.9-8
PROJECT SIZE RATING SCORE

LCC Class I or II Soils		LCC Class III Soils		LCC Class IV or Lower Soils	
Acres	**Score**	**Acres**	**Score**	**Acres**	**Score**
80 or Above	100	160 or Above	100	320 or Above	100
60 to 79	90	120 to 159	90	240 to 319	80
40 to 59	80	80 to 119	80	160 to 239	60
20 to 39	50	60 to 79	70	100 to 159	40
10 to 19	30	40 to 59	60	40 to 99	20
Fewer than 10	0	20 to 39	30	Fewer than 40	0
--	--	10 to 19	10	--	--
--	--	Fewer than 10	0	--	--

Source: RECON 2018c.

As shown in **Table 4.9-9**, the Project site is assigned the maximum Project Size Score of 100 because it includes over 160 acres of soils with an LCC rating of IIIw (RECON 2018c).

TABLE 4.9-9
PROJECT SIZE SCORE

Soil Type	LCC Class I-II	LCC Class III	LLC Class IV-VIII
Holtville Silty Clay, Wet	5.8	--	--
Imperial Silty Clay, Wet	--	409.9	--
Imperial-Glenbar Silty Clay Loams, Wet, 0 to 2 Percent Slopes	--	298.6	--
Meloland Very Fine Sandy Loam, Wet	--	42.4	--
Rositas Fine Sand, Wet, 0 to 2 Percent Slopes	--	6.0	--
Total Acres	5.8	757.0	--
Project Size Scores	0	100	0
Highest Project Size Score	--	100	--

Source: RECON 2018c. NOTE: Totals may vary due to independent rounding. LCC = Land Capability Classification

Water Resources Availability Rating

The Water Resource Availability Rating is based upon identifying the various water sources that may supply a given property, and then determining whether different restrictions in supply are likely to take place in years that are characterized as being periods of drought and non-drought.

Agricultural production on the Project site is irrigated entirely by irrigation water provided by IID, reflecting a high reliability of IID to deliver water during drought and non-drought years. Further, current agricultural production on the Project site has no physical or economic restrictions that could reduce the availability of water resource supply during either drought or non-drought years. As shown in **Table 4.9-10**, the Project site therefore is assigned the maximum Water Resources Availability Score of 100 (RECON 2018a).

TABLE 4.9-10
WATER RESOURCES AVAILABILITY SCORE

Project Portion	Water Source	Proportion of Project site	Water Availability Score	Weighted Water Availability Score
1	Imperial Irrigation District Irrigation Water	100 Percent	320 or Above	100
			Total Water Resources Score	**100**

Source: RECON 2018c.

Surrounding Agricultural Land Rating

The Surrounding Agricultural Land Rating provides a measurement of how land near a given project, both directly adjoining and within a defined distance away, may both influence and be influenced by the agricultural land use of the subject Project site. The Surrounding Agricultural Land Rating is based on identification of a Project site's "Zone of Influence" (ZOI), which consists of surrounding parcels located within 0.25 mile from the project's boundary. Parcels that are intersected by the 0.25-mile buffer are included in their entirety. The Project site is then assigned a "Surrounding Agricultural Land" score based upon the percentage of agricultural land in the ZOI. The LESA Model rates the potential significance of the conversion of an agricultural parcel that has a large proportion of surrounding land in agricultural production more highly than one that has a relatively small percentage of surrounding land in agricultural production (RECON 2018c).

Table 4.9-11 shows the Surrounding Agricultural Land Rating Scores the LESA Model assigns projects based on the percentage of surrounding land in agricultural production within the ZOI (RECON 2018c).

TABLE 4.9-11
SURROUNDING AGRICULTURAL LAND RATING SCORES

Percent of Project ZOI in Agricultural Use	Surrounding Agricultural Land Score
90 to 100	100
80 to 89	90
75 to 79	80
70 to 74	70
65 to 69	60
60 to 64	50
55 to 54	40
50 to 54	30
45 to 49	20
40 to 44	10
40<	0

Source: RECON 2018c.

Figure 4.9-2 shows that land within the northern, western, and southwestern portions of the ZOI are currently in agricultural production, which constitutes approximately 55 percent of the ZOI. Because land currently in agricultural production constitutes approximately 55 percent of the ZOI, the Project site is assigned a Surrounding Protected Resource Land Rating score of 40 (RECON 2018c).

Surrounding Protected Resource Land Rating

The Surrounding Protected Resource Land Rating is essentially an extension of the Surrounding Agricultural Land Rating, and is scored in a similar manner. Protected resource lands are those lands with long-term use restrictions that are compatible with or supportive of agricultural uses of land, including the following:

- Williamson Act contracted land;
- Publicly owned lands maintained as park, forest, or watershed resources; and
- Lands with agricultural, wildlife habitat, open space, or other natural resource easements that restrict the conversion of such land to urban or industrial uses (RECON 2018c).

Table 4.9-12 shows the Surrounding Protected Resource Land Rating Scores the LESA Model assigns projects based on the percentage of protected resource lands within the ZOI. **Figure 4.9-3** presents the location and acreage of protected land within the ZOI. Approximately 389.6 acres of Williamson Act lands are located within the ZOI, which constitutes approximately 15 percent of the ZOI. Because the percentage of protected land is less than 40 percent of the ZOI, the Project site is assigned a Surrounding Protected Resource Land Rating score of zero.

TABLE 4.9-12
SURROUNDING PROTECTED RESOURCE LAND RATING SCORES

Percent of Project ZOI Defined as Protected	Surrounding Protected Resource Land Score
90 to 100	100
80 to 89	90
75 to 79	80
70 to 74	70
65 to 69	60
60 to 64	50
55 to 54	40
50 to 54	30
45 to 49	20
40 to 44	10
40<	0

Source: RECON 2018c.

D. DREW SWITCHYARD AND GEN-TIE LINES COMPONENT

Existing Uses

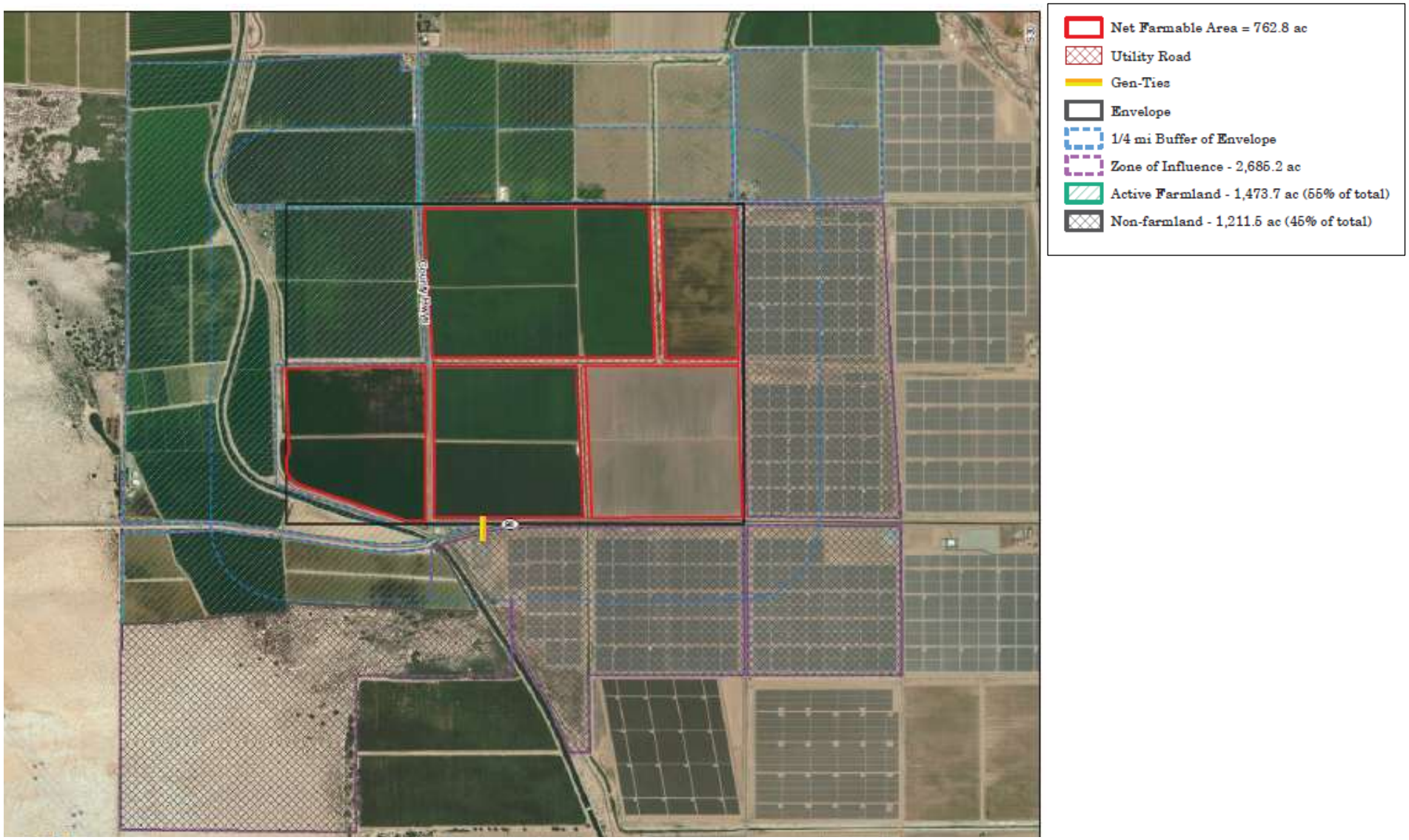
The Drew Switchyard is currently developed as an existing electrical power transmission facility on APN 052-190-039-000 located south of SR 98 across from the proposed Project site (specifically, Phase 1, CUP 17-0031). The Centinela Solar Project currently connects to the Drew Switchyard.

Proposed Uses

This component includes the construction, operation and decommissioning of required improvements at the existing Drew Switchyard facility and supporting transmission and the two Gen-Tie lines extending from the south end of the Project site across SR 98 into the Drew Switchyard located on APN 052-190-039-000-000 in order to accommodate the Project's proposed utilization of the facility. The two Gen-Tie lines are proposed to extend approximately 400 feet south from the Project site across Drew Road and SR 98. One gen-tie is for solar generation and one is for energy storage. Both gen-tie lines may be underground or one may be underground and one above-ground. The Project may bore under SR 98 to connect to the Drew Switchyard or a new pole may be constructed on the existing Centinela Solar Project on APN 052-190-041-000 and its line cutover into the new bay constructed by Drew Solar in the existing Drew Switchyard in order to minimize power line crossings.

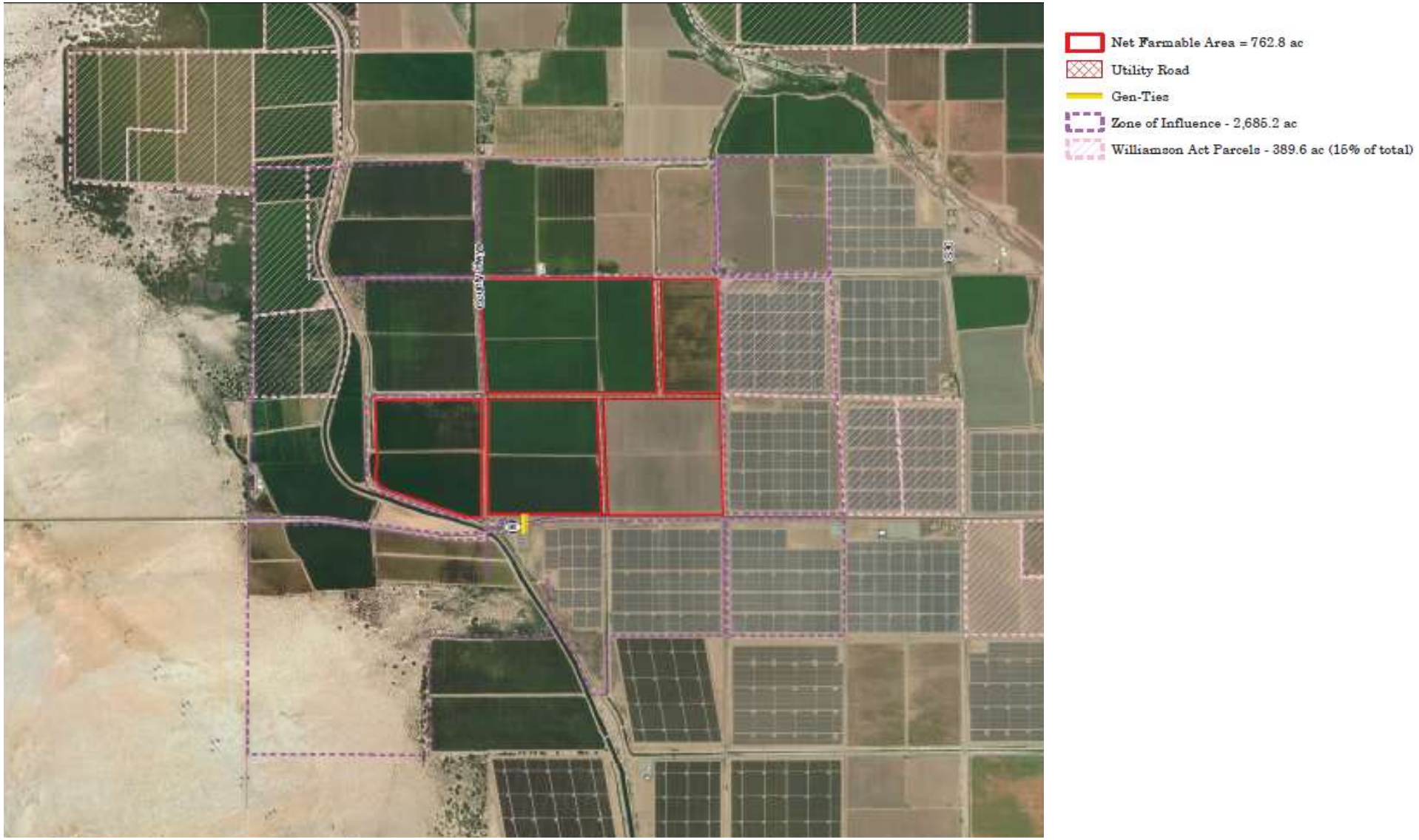
Full Build-out Scenario and Phased CUP Scenario

As shown on **Figure 4.9-1**, the Drew Switchyard Site is classified as "Other Land," and the Centinela Solar Project site is classified as "Urban and Built-up Land" under the DOC's Important Farmlands Classifications. Therefore, conversion of Important Farmland is not an issue under the Drew Switchyard and Gen-Tie Component.



Source: RECON 2018c.

FIGURE 4.9-2
SURROUNDING AGRICULTURAL LAND



Source: RECON 2018c.

FIGURE 4.9-3
SURROUNDING PROTECTED RESOURCE LAND

4.9.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the thresholds identified in the CEQA Guidelines, as listed in Appendix G. The Project would result in a potentially significant impact to agricultural resources if it would result in any of the following:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 511 04(g)).

d) Result in the loss of forest land or conversion of forest land to non-forest use.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

B. ISSUES SCOPED OUT AS PART OF THE INITIAL STUDY

Two CEQA significance criteria were scoped out as part of the Initial Study.

Criterion "c" was scoped out because mixed chaparral, pinyon-juniper habitats, and the montane hardwood-conifer forest are located in restricted areas of the County. Mixed chaparral and pinyon-juniper habitats are located in the extreme southwestern corner of Imperial County; montane hardwood-conifer forest is in the extreme northwestern corner of Imperial County. Thus, there are no existing forest lands, timberlands, or timberlands zoned Timberland Production either on the solar field site parcels or in the immediate vicinity of the Project area that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for this issue area.

Criterion "d" was scoped out because there are no existing forest lands either on the solar field site parcels or in the immediate vicinity. The proposed Project would not result in the loss of forest land or conversion of forest land to a non-forest use. Therefore, no impact is identified for this issue area.

Subsequent to publication of the Initial Study, an additional criteria was scoped out due to changes in the Project Description and the Regulatory Framework within Imperial County.

Criterion "b" was scoped out because the Applicant removed a component of the Project as originally proposed that would have included a ZC of two parcels to Medium Industrial (M-2), and thereby potentially constitute a significant and unavoidable impact regarding a conflicts with agricultural zoning. The issue of Project consistency with the Land Use Ordinance as a whole (not limited to agricultural zoning) is discussed in Chapter 4.2, Land Use.

Criterion "b" also refers to conflicts with Williamson Act contracts. As discussed above under Regulatory Framework, none of the Project site parcels are currently under Williamson Act contracts, but there are nine parcels within the surrounding vicinity under Williamson Act contracts. However, all of the surrounding land contracts are currently in involuntary non-renewal status, and these contracts, along

with all other Williamson Act contracts in Imperial County, will terminate on or before December 31, 2018 (County of Imperial 2018). Therefore, no impact is identified for this issue area.

C. METHODOLOGY

Baseline conditions described in subsection 4.9.2 have been evaluated with regard to their potential to be affected by Project construction, operation and maintenance, and decommissioning activities. These activities were identified based, in part, on information provided by the Applicant to Imperial County.

As stated in Appendix G of the CEQA Guidelines, the Land Evaluation and Site Assessment (LESA) model is intended to provide lead agencies with an optional methodology to ensure significant effects on the environment of agricultural land conversion are quantitatively and consistently considered in the environmental review process. The model provides an approach for rating the relative quality of land resources using a point-based evaluation composed of six different factors. Land Evaluation factors are based upon measures of soil resource quality including Land Capability Classification (LCC) and Storie Index, while Site Assessment factors are evaluated based on a project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, each of these factors is rated on a 100-point scale. Each factor has a relative weight and are combined to one numeric score that is then evaluated against the scoring thresholds provided in the LESA Model instruction manual. A project's LESA model score is used to make a determination of the potential significance of the conversion of agricultural lands (RECON 2018c).

The Project site was evaluated using the California LESA Model to rate the quality and availability of agricultural resources and to identify whether the project would meet the threshold criteria as having a significant impact to Agricultural Resources under California Environmental Quality Act Guidelines. The LESA Model score will also serve as a benchmark documenting the existing condition of Project site soils at the time of conversion to the proposed solar generation and energy storage facilities. The land must be restored to the same benchmark LESA score as part of the Reclamation Plan (refer to Chapter 2.0, Section 2.1.5F). The LESA Model does not take into account the duration of the Project site's conversion to non-agricultural uses (i.e. temporary) and instead assumes permanent conversion. Therefore, the model provides a worst-case scenario for analysis (RECON 2018c).

Due to a history of soil compaction, the existing utility roads within the Project site are not suitable for future agricultural production. Consequently, the LESA modeling excludes the existing utility roads and are focuses on the 762.8 net farmable-acres within the Project site (RECON 2018c).

D. PROJECT IMPACTS AND MITIGATION MEASURES

Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance

Impact 4.9.1 The proposed Project, whether implemented as the Full Build-out Scenario or six individual CUPs proposed as part of the Phased CUP Scenario, would temporarily convert Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. This is considered a **potentially significant impact**.

FULL BUILDOUT SCENARIO[2]

Construction and Operation

Construction and operation of the proposed Full Build-out Scenario, inclusive of all six CUPs and five phases, would result in the temporary direct conversion of approximately 762.8 acres (48.3 acres of

[2] This analysis is equally applicable to development of the Full Build-out Scenario in either the Near-Term (2019) Scenario or the Long-Term (2027) Scenario.

Prime Farmland and 714.5 acres of Farmland of Statewide Importance) (**Table 4.9-3a**) of agricultural land currently in crop production to a non-agricultural use (RECON 2018c). The impacts are considered temporary because the Solar Energy Center would be removed and the Solar Field Site Parcels returned to agricultural production at the end of the life of the Project CUPs. The right to continue farming will also continue on the agricultural fields until it is necessary to commence construction of each CUP.

As discussed above, a LESA Model analysis was prepared for the Solar Field Site Parcels that comprise the Full Build-out Scenario (**Appendix H** of this EIR). **Table 4.9-13** presents a summary of the LESA Model for the Full Build-out Scenario. As shown, the LE sub-score is 21.9, while the SA sub-score is 36.0, resulting in a final LESA score of 57.90. As shown in **Table 4.9-14**, a final LESA score between 40 to 59 points is considered significant if both the LE and SA sub-scores are greater than or equal to 20 points. Because both sub-scores (LE and SA) are greater than 20, the Project is considered to have a **potentially significant impact** for conversion of Prime Farmland, and Farmland of Statewide Importance (RECON 2018c) for the Full Build-out Scenario. However, there is no methodology to adjust the LESA score for a temporary conversion. Therefore, the LESA score is used for the purpose of documenting the existing conditions of on-site soils for the purposes of the Reclamation Plan.

TABLE 4.9-13
FINAL LESA SCORE SHEET SUMMARY FOR THE FULL BUILD-OUT SCENARIO

Factor Name	Factor Score (0 – 100 Points)	Factor Weighting (Total = 1.00)	Weighted Factor Score
Land Evaluation (LE)			
1. Land Capability Classification (LCC Rating)	60.1	0.25	15.0
2. Storie Index Rating	27.7	0.25	6.9
		Land Evaluation Sub-score	*21.9*
Site Assessment (SA)			
1. Project Size Rating	100	0.15	15.0
2. Water Resource Availability Rating	100	0.15	15.0
3. Surrounding Agricultural Lands Rating	40	0.15	6.0
4. Surrounding Protected Resource Lands Rating	0	0.05	0
		Site Assessment Sub-score	*36.0*
		TOTAL	**57.9**

Source: RECON 2018c.

TABLE 4.9-14
CALIFORNIA LAND EVALUATION AND SITE ASSESSMENT MODEL SCORING THRESHOLDS

Total Land Evaluation and Site Assessment Score	Scoring Decision
0 to 39 Points	Not Considered Significant
40 to 59 Points	Considered Significant only if Land Evaluation and Site Assessment subscores are each greater than or equal to 20 points
60 to 79 Points	Considered Significant unless either Land Evaluation or Site Assessment subscore is less than 20 points
80 to 100 Points	Considered Significant

Source: RECON 2018c.

The portion of the Project on lands associated with the Gen-Tie transmission line are not expected to permanently remove adjacent agricultural land from production because these lands have been previously converted by construction of the Drew Switchyard and Centinela Solar Project. They are part of the existing condition and were not considered in the LESA analysis. As such, the portion of the Project on lands associated with the Gen-Tie transmission line are not expected to permanently remove adjacent agricultural land from agricultural production and **no impact** is anticipated.

PHASED-CUP SCENARIO

Whether buildout associated with the Project occurs at one time (Full Build-out Scenario) or in phases (Phased CUP Scenario) as anticipated, the Project site (all CUP areas) would be temporarily converted from an agricultural use to a non-agricultural use. **Table 4.9-15** shows a summary of this conversion by CUP area and Project Phase.

TABLE 4.9-15
SUMMARY OF IMPORTANT FARMLAND BY PROJECT PHASE / CUP AREA

FMMP Category	Phase 1 Acres	Phase 2 Acres	Phase 3 Acres	Phase 4 Acres	Phase 5 Acres	Total Acres	Percent Total
Prime	2.7	0.0	0.0	6.1	39.5	48.3	6.3%
Statewide	155.2	158.6	152.2	151.0	97.5	714.5	93.7
Total	**157.9**	**158.6**	**152.2**	**157.1**	**137.0**	**762.8**	**100%**

Source: RECON 2018d.

Based on the LESA model for the overall Project site / Full Build-out Scenario (refer to discussion above and **Table 4.9-11**), the Project is considered to have a potentially significant impact on agricultural resources. As such, a separate model by CUP would not change the outcome of the overall Project LESA analysis (Larkin 2018). Therefore, development of the CUP areas would result in a **potentially significant impact** with regard to conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under CEQA for the Phased CUP Scenario.

Decommissioning/Reclamation

At the end of the 30-year operational life of the Project's CUPs, the facilities in each of the CUP Areas would be disassembled and removed; the soil would be reclaimed to agricultural land in accordance with the provisions of the Reclamation Plan (i.e. LESA score of 57.9) as required and financially assured by mitigation measure MM 4.9.1b. As a result, decommissioning impacts associated with conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be considered **less than significant** following completion of decommissioning and reclamation

The decommissioning process for the Gen-Tie line is not anticipated to disturb additional agricultural land as it will occur within the solar field site parcels, existing Drew Switchyard site, and possibly on the existing Centinela Solar site. Therefore, any disturbance would occur within areas already covered as part of the required Reclamation Plan for the respective project (i.e. Drew Solar or Centinela Solar).

Mitigation Measures

MM 4.9.1a Payment of Agricultural and Other Benefit Fees

One of the following options included below shall be implemented prior to the issuance of a grading permit or building permit (whichever is issued first) for the proposed Project:

For Non-Prime Farmland:

- **Option 1**: The Permittee shall procure Agricultural Conservation Easements on a 1 to 1 basis on land of equal size, of equal quality of farmland, outside the path of development. The Conservation Easement shall meet the State Department of Conservation's regulations and shall be recorded prior to issuance of any grading or building permits;

- **Option 2**: The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 20% of the fair market value per acre for the total acres of proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee, will be placed in a trust account administered by the Imperial County Agricultural Commissioner's office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County; or

- **Option 3**: The Permittee and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that is (1) consistent with Board Resolution 2012-005; (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy.

For Prime Farmland:

- **Option 1**: The Permittee shall procure Agricultural Conservation Easements on a "2 to 1" basis on land of equal size, of equal quality farmland, outside of the path of development. The Conservation Easements shall meet the State Department of Conservation's regulations and shall be recorded prior to issuance of any grading or building permits; or

- **Option 2**: The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 30 percent of the fair market value per acre for the total acres of the proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee, will be placed in a trust account administered by the Imperial County Agricultural Commissioner's office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County.

  Option 3: The Permittee and County shall enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that is (1) consistent with Board Resolution 2012-005; (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy; the Project and other recipients of the Project's Agricultural Benefit Fee funds; or emphasis on creation of jobs in the agricultural sector of local economy for the purpose of off-setting jobs displaced by this Project.

- **Option 4**: The Permittee shall revise their CUP Application/Site Plan to avoid Prime Farmland.

Timing/Implementation: *Prior to the issuance of a grading permit or building permit (whichever is issued first).*

Enforcement/Monitoring: *Imperial County Planning and Development Services Department.*

MM 4.9.1b Reclamation/Decommissioning Plan and Security

Prior to the issuance of a grading permit or building permit (whichever is issued first) for the proposed Project, the Permittee shall submit to Imperial County a Reclamation and Decommissioning Plan. The plan shall document the procedures by which each CUP area will be returned to its current agricultural condition/LESA score of 57.9. The Permittee shall also provide financial assurance/bonding in an amount equal to a cost estimate prepared by a California-licensed general contractor or civil engineer for implementation of the Reclamation Plan in the event Permittee fails to perform the Reclamation Plan.

Timing/Implementation: *Prior to the issuance of a grading permit or building permit (whichever is issued first).*

Enforcement/Monitoring: *Imperial County Planning and Development Services Department.*

Significance After Mitigation

Implementation of mitigation measure MM 4.9.1a would reduce the impacts related to temporary loss of Prime Farmland and Farmland of Statewide Importance by assuring it is a temporary impact and compensating for socio-economic impacts associated with the conversion of farmland.

The assurance that the impact will be temporary is accomplished through the Permittee's commitment to a reclamation plan and mitigation measure MM 4.9.1b that requires the Permittee restore the site to agricultural use with a soil value equal to the pre-Project condition and back that commitment with financial security. In this case, the LESA model will be used as the performance standard for determining whether the soil has been restored to pre-Project conditions. The assurance that the Project will compensate for socio-economic impacts associated with the conversion of agricultural lands is accomplished through the commitment of the Permittee to pay agricultural benefit fees and community benefit fees in the development agreement.

Implementation of any of the options under mitigation measure MM 4.9.1a, in combination with mitigation measure MM 4.9.1b would reduce the impacts associated with the temporary conversion of farmland, including Prime Farmland and Farmland of Statewide Importance to **less than significant**.

Indirect Environmental Effects of Conversion of Farmland

Impact 4.9.2 The proposed Project would not involve other changes to the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use. Nuisance issues such as dust, pests and weeds are already addressed through ICAPCD Rules and County requirements to prepare Weed and Pest Management Plans. Thus, indirect effects of the temporary conversion of farmland are considered **less than significant**.

FULL BUILD-OUT SCENARIO/PHASED CUP SCENARIO

Construction and Operation

Agricultural land and other solar generation facilities currently surround all the Project site, and therefore the proposed Project would place a solar energy generation facility in an area currently used for agriculture as well as similar utility-scale solar developments. The Project does not include the extension of sewer and water utilities or road infrastructure that would pressure nearby lands to urbanize with residential, commercial, or other non-solar urban development. Moreover, neither the Full Build-out Scenario nor the Phased CUP Scenario is anticipated to result in a growth-inducing impact that will cause the indirect conversion of farmland on adjoining or nearby properties because the Project's power generation would be used to meet existing and future planned energy demands. Likewise, the proposed Project does not create new energy demand that would cause new development on adjacent properties.

Project implementation would result in emission of fugitive dust and DPM during construction and operational maintenance activities. Compliance with ICAPCD Regulation VIII throughout the Project site and at each CUP area would reduce operational PM_{10} and DPM emissions in accordance with ICAPCD Fugitive Dust Rules (refer to Section 4.4, Air Quality). Imperial County is in a non-attainment area for PM_{10} and for O_3 (8-hour). As discussed in connection with cumulative construction impacts, other cumulative projects in the Salton Sea Air Basin (SSAB) will also be required to comply with the air quality regulations set forth in the Air Quality Management Plan (AQMP), State Implementation Plan (SIP) and ICAPCD Rules, including Regulation VIII, during operations.

Project construction and operation would be subject to compliance with State nuisance law (California Civil Code Sub-Section 3482) that prohibits the Project site from being used in a manner that would allow dust, weeds, or pests to be a nuisance to its neighbors. In addition, the Applicant will be required to develop and implement a Weed and Pest Management Plan.

Therefore, compliance with existing regulations, including ICAPCD Regulation VIII (identified in Section 4.4), and implementation the of the Weed and Pest Management Plan would reduce indirect environmental effects of conversion of farmland during construction and operation to **less than significant** for both the Full Build-out Scenario and the Phased CUP Scenario.

Decommissioning/Reclamation

At the end of the Project's useful life, the Drew Solar Project would be disassembled and reclaimed to pre-Project soil conditions. Similar to construction, reclamation activities could result in an increase in pests, weeds and dust on adjacent lands that could adversely affect agricultural operations and pressure adjacent lands to convert to non-agricultural uses. However, the Project decommissioning and reclamation would be subject to compliance with the same mitigation measures, State air quality and nuisance laws, and Weed and Pest Management Plan as during Project construction. Therefore, indirect environmental effects of conversion of farmland from potential decommissioning nuisances would be considered **less than significant** for both the Full Build-out Scenario and the Phased CUP Scenario. Upon completion of reclamation, the Project site would be reclaimed to agricultural land.

Mitigation Measures

No new mitigation required.

Significance After Mitigation

Not Applicable.

4.9.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The geographic scope for cumulative impacts to agricultural resources is the Imperial Valley located in Imperial County. The Imperial Valley consists of approximately 500,000 acres of more-or-less contiguous farm fields located in the Imperial Valley and surrounded by desert and mountain habitat. The Imperial Valley comprises approximately 17 percent of the County's 2,942,080 acres (Imperial County 2015c, p. 5). Based on the most current available information from the Department of Conservation approximately 528,471 acres of the County are designated as farmland under the FMMP (DOC 2016b). County-wide approximately 22,257 acres of projects are currently proposed, under construction, or have been completed, excluding the proposed Project. **Table 4.9-16** summarizes these projects and the acreage of agricultural land that would temporarily or permanently convert agricultural land associated with each project. Many of these are solar energy generation facilities.

TABLE 4.9-16
SUMMARY OF AGRICULTURAL ACREAGE TEMPORARILY OR PERMANENTLY CONVERTED

Project Name	Acres*
Rancho Los Logos	1,076
McCabe Ranch II	457
McCabe Ranch	80
Imperial Center	78
101 Ranch	1,897
Canergy	83
Chocolate Mountain	320
Imperial Valley Solar II	142
IV Solar Company	123
Midway Solar Farm I	480
Midway Solar Farm II	320
Lindsey Solar Farm	148
Wilkinson Solar Farm	302
Calipat Solar Farm I	159
Alhambra Solar/Solar Gen 2	482
Arkansas Solar/Solar Gen 2	481
Sonora Solar/Solar Gen 2	488
Imperial Solar West (Westside Main)	1,130
Campo Verde	1,443
Imperial Solar South	947
Calexico I-A	720
Calexico I-B	610
Calexico II-A	940
Calexico II-B	525
Mount Signal Solar	1,431
Centinela Solar	2,067

TABLE 4.9-16
SUMMARY OF AGRICULTURAL ACREAGE TEMPORARILY OR PERMANENTLY CONVERTED

Project Name	Acres*
Lyons Solar	138
Rockwood Solar	396
Ferrell Solar	364
Iris Solar Farm	502
Imperial Solar 1 (Heber)	80
Seville Solar (Allegretti)	1,238
Wistaria Ranch Solar	2,661
Total Acres Without Proposed Project	**22,257**
Drew Solar Project**	763
Total Acres With Proposed Project	**23,020**

*Source: ICPDSD 2018b. * Acreage values rounded to the nearest whole. **Net agricultural acreage minus the acreage of roads and ditches currently on each parcel.*

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Agricultural Resources Impacts

Impact 4.9.3 Implementation of the Project under both the Full Build-out Scenario and the Phased CUP Scenario would incrementally add to the temporary conversion of agricultural land in Imperial County. Temporary impacts to agricultural resources are mitigated on a project-by-project basis through payment of in-lieu fees, conservation easements and/or execution of Public Benefit Agreements. Therefore, temporary impacts to agricultural resources are considered **less than cumulatively considerable**.

FULL BUILD-OUT SCENARIO / PHASED CUP SCENARIO

Construction, Operation and Decommissioning

Cumulative impacts on agricultural resources take into account the temporary impacts under the Full Build-out Scenario and by CUP area under the Phased CUP Scenario, as well as those likely to occur as a result of other proposed, approved and reasonably foreseeable projects in the region. To determine cumulative impacts on agricultural resources, the temporal nature of the impacts on individual resources is assessed. Solar developments are considered temporary rather than permanent (such as with residential or industrial development) based on a specified operational life of a solar project identified in its respective CUP and the requirement that the lands on which solar farms are located be restored to pre-Project soil conditions. The inventory of agricultural resources within the cumulative setting is also considered when assessing the impacts of each individual project. This Project serves as infill in an area which already developed with other solar generation facilities.

Of the 855 gross acres that comprise the solar field site parcels, approximately 762.8 net acres (rounded to 763 acres) of agricultural land would be temporarily converted (i.e. agricultural fields within the solar field site parcels minus the acreage of roads and ditches currently on each parcel). Thus, both the Full Build-out Scenario or Phased CUP Scenario would incrementally add to the temporary conversion of agricultural land in Imperial County.

As previously shown in **Table 4.9-2**, above, approximately half of the County's acreage (528,471 acres out of a total of 1,028,525 acres) is Important Farmland (DOC 2016b). **Table 4.9-17** summarizes the

percentage of each type of farmland in the County that would be temporarily converted under both the Full Build-out Scenario and Phased CUP Scenario.

TABLE 4.9-17
PERCENTAGE CONVERSION OF FARMLAND BY THE PROPOSED PROJECT

Agriculture Classification	(A) Total Acreage in Imperial County	(B) Approximate Acreage Converted on Solar Field Site Parcels	(B÷A x 100) Project Percent of County Acreages
Prime Farmland	190,205	48.3	0.025
Farmland of Local Importance	297,272	0.0	0.00
Farmland of Statewide Importance	2,070	714.5	0.345
Unique Farmland	38,924	0.0	0.00
Total Farmland	**528,471**	**762.8**	**0.144**

Source: DOC 2016b, RECON 2018c.

As shown in **Table 4.9-17**, the Important Farmland (Prime Farmland, Farmland of Local Importance, Farmland of Statewide Importance and Unique Farmland) within the Project site comprises approximately 0.144 percent (762.8 acres ÷ 528,471 acres x 100) of the total Important Farmland in the County. Thus, the proposed Project would temporarily convert a very small fraction of the total Important Farmlands in the County and have a minimal effect on agricultural land on a cumulative scale. Furthermore, the conversion would be temporary and last for the duration the Project's operational life stated in the CUP (i.e., 30 years).

As illustrated in **Table 4.9-17** and discussed in Impact 4.9.1, above, construction of the proposed Project would temporarily convert 48.3 acres of Prime Farmland and 714.5 acres of Farmland of Statewide Importance to a non-agricultural use over the operational life of the Project. Mitigation measures are identified to minimize the Project's contribution to the cumulative impact to the temporary conversion of agricultural land. As discussed above, mitigation measure MM 4.9.1a provides for the Applicant and the County to enter into a binding Development Agreement which provides for certain mitigation fees and confirms the use of such fees to mitigate possible or perceived impacts. Mitigation measure MM 4.9.1b requires the Applicant to submit to Imperial County a Reclamation Plan with a financial security mechanism to return the Project site to its current agricultural condition/LESA Score at the end of the operational life of the Project. The implementation of the Reclamation Plan would eventually return the solar field site parcels to farmland.

Table 3.0-1, proposed, approved and reasonably foreseeable projects in the region (refer to Chapter 3.0) includes solar developments, similar to the proposed Project, for consideration in the cumulative analysis. The majority of these projects are located on private lands, which are predominately agricultural, and would have impacts to Important Farmland similar to the proposed Project. When the proposed Project is combined with the cumulative projects (identified in Table 3.0-1 and noted as part of the County-wide solar projects listed in **Table 4.9-16**), the total agricultural land conversion is estimated to be 23,020 acres (inclusive of all Important Farmland acreage and the proposed Project) out of the 528,471 acres of farmland within the County (DOC 2016b). During construction and operation, the Full Build-out Scenario, inclusive of all CUP areas, would contribute approximately 3.3 percent (763 acres ÷ 23,020 acres x 100) of the total temporary agricultural land conversion associated with cumulative solar projects on a County-wide basis. Like the proposed Project, each individual cumulative project would be required to provide mitigation for any impacts to agricultural resources at the project level. Therefore, upon implementation of mitigation measures MM 4.9.1a and MM 4.9.1b, the Project's

incremental contribution to the temporary conversion agricultural land to non-agricultural uses would be **less than cumulatively considerable** under both the Full Build-out Scenario and Phased CUP Scenario.

Mitigation Measures

Mitigation measures will be imposed on the Full Build-out Scenario and all CUPs (CUP#17-0031 thru CUP #17-0035 and CUP#18-0001) proposed as part of the Phased CUP Scenario to minimize the Project's contribution to the cumulative impact on temporary conversion of farmland or voluntarily enter an enforceable Development Agreement that assures payment of Agricultural Benefit Fees, as compensation for the perceived socio-economic impacts from the temporary loss of the agricultural resources. Implementation of mitigation measure MM 4.9.1a would reduce the impacts related to temporary loss of Prime Farmland and Farmland of Statewide Importance by assuring it is a temporary impact and compensating for socio-economic impacts associated with the conversion of farmland

Mitigation measure MM 4.9.1b requires preparation of a reclamation plan to be implemented at the end of the Project's useful life. The reclamation plan would identify the process by which the Full Build-out Scenario and all CUPs (CUP#17-0031 thru CUP #17-0035 and CUP#18-0001) proposed as part of the Phased CUP Scenario would be returned to a condition that could support agricultural production similar to pre-Project conditions. MM 4.9.1b also requires a funding mechanism for the reclamation plan. Implementation of the reclamation plan would eventually return the solar field site parcels to farmland.

Significance After Mitigation

Implementation of mitigation measures MM 4.9.1a and MM 4.9.1b would reduce the Full Build-out Scenario and all CUPs (CUP#17-0031 thru CUP #17-0035 and CUP#18-0001) contribution to cumulative temporary conversion of agricultural land to **less than cumulatively considerable.**

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