4.2 AGRICULTURAL RESOURCES

This section provides an overview of existing agricultural resources within the project study areas and identifies applicable federal, state, and local policies related to the conservation of agricultural lands (see Section 4.2.1). This includes a summary of the production outputs, soil resources and adjacent operations potentially affected by the projects. The impact assessment in Section 4.2.2 provides an evaluation of potential adverse effects to agricultural resources based on criteria derived from the California Environmental Quality Act (CEQA) Guidelines in conjunction with actions proposed in Chapter 3, Project Description. Section 4.2.3 provides a discussion of residual impacts, if any. Environmental Management Associates prepared Land Evaluation Site Assessments (LESA) for the FSF, RSF, ISF, and LSF sites in May 2013, and these are included in Appendix C. The site restoration plans for the FSF, RSF, ISF, and LSF are included in Appendix L.

No forestry resources are present within the project study areas and, therefore, this section focuses on issues related to agricultural resources.

4.2.1 Environmental Setting

In 2013, Imperial County (County) was ranked tenth among the 58 counties in the State of California with respect to production of agricultural goods, earning $1,945,759,000 (gross) for the State's economy (California Department of Food and Agriculture 2011-2012). Vegetable and melon crops were the top commodities in Imperial County producing $865,401,000 in the year 2013. Livestock and field crops and were the next two largest commodities generating $617,371,000 and $471,461,000, respectively, for Imperial County (Imperial County Agricultural Commissioner 2013).

4.2.1.1 Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the projects.

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 land owner.

Under the provisions of the Williamson Act (California Land Conservation Act 1965, Section 51200), landowners contract with the County to maintain agricultural or open space use of their lands in return for reduced property tax assessment. The contract is self-renewing and the landowner may notify the County at any time of intent to withdraw the land from its preserve status. Withdrawal involves a ten-year period of tax adjustment to full market value before protected open space can be converted to urban uses. Consequently, land under a Williamson Act Contract can be in either a renewal status or a nonrenewable status. Lands with a nonrenewable status indicate the farmer has withdrawn from the Williamson Act Contract and is waiting for a period of tax adjustment for the land to reach its full market value. Nonrenewable and cancellation lands are candidates for potential urbanization within a period of ten years.

There are three active Williamson Act Contracts within the FSF and ISF project study areas. Agricultural Preserve 160 includes the two parcels associated with Contract 2003-02 (APNs 059-050-003 and 059-120-001); and one parcel associated with Contract 2004-01 (APN: 059-050-002) within the ISF project study area. One parcel associated with Contract 2003-001 (APN: 059-050-001) is also part of

Agricultural Preserve 160 and is located within the FSF project study area. Petitions for cancellation of these contracts were filed with the County in 2014.

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 local agencies make both the Consistency with the Williamson Act and Public Interest findings. The projects are not covered by a FSZ. The cancellation of land conservation contracts for the proposed projects is being requested under Public Interest findings. In order to find that the cancellation is in the public interest, the County Board of Supervisors must find:

1. Other public concerns substantially outweigh the objectives of the Williamson Act; and,
2. That development of the contracted land would provide more contiguous patterns of urban development than development of proximate non-contracted land.

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. This issue is discussed further in the impact analysis.

Farmland Security Zones

In August 1998, the Williamson Act's FSZ provisions were enacted with the passage of Senate Bill 1182 (Costa, Chapter 353, Statutes of 1998). This sub-program, dubbed the "Super Williamson Act," enables agricultural landowners to enter into contracts with the County for 20-year increments with an additional 35 percent tax benefit over and above the standard Williamson Act contract. As of 2010, no applications have been made for FSZs within the study areas.

California Farmland Mapping and Monitoring Program

The California Department of Conservation (DOC), under the Division of Land Resource Protection, has set up the Farmland Mapping and Monitoring Program (FMMP), which monitors the conversion of the state's farmland to and from agricultural use. The map series identifies eight classifications and uses a minimum mapping unit size of ten acres. The program also produces a biannual report on the amount of land converted from agricultural to non-agricultural use. The program maintains an inventory of state agricultural land and updates its "Important Farmland Series Maps" every two years. Table 4.2-1 provides a summary of agricultural land within Imperial County converted to non-agricultural uses during the time frame from 2008 to 2010 (DOC 2010). Figure 4.2-1 illustrates the FMMP designations for the project study areas.

Local

County of Imperial General Plan

The Agricultural Element of the County's General Plan serves as the primary policy statement for implementing development policies for agricultural land use in Imperial County. The goals, objectives, implementation programs, and policies found in the Agricultural Element provide direction for new development as well as government actions and programs. Imperial County's Goals and Objectives are intended to serve as long-term principles and policy statements to guide agricultural use decision-making and uphold the community's ideals.

TABLE 4.2-1. IMPERIAL COUNTY CHANGE IN AGRICULTURAL LAND USE SUMMARY (2008-2010)

Land Use Category	Total Acreage Inventoried		2008-2008 Acreage Changes			
	2008	2010	Acres Lost (-)	Acres Gained (+)	Total Acreage Changed	Net Acreage Changed
Prime Farmland	195,589	194,137	1,865	414	2,279	-1,451
Farmland of Statewide Importance	311,048	307,221	4,579	753	5,332	-3,826
	2,196	2,141	65	9	74	-56
Unique Farmland/Farmland of Local Importance	32,109	35,774	1,664	5,329	6,993	3,665
Important Farmland Subtotal	***540,942***	***539,273***	***8,173***	***6,505***	***14,678***	***-1,668***
Grazing Land	0	0	0	0	0	0
Agricultural Land Subtotal	***540,942***	***539,273***	***8,173***	***6,505***	***14,678***	***-1,668***
Urban and Built-Up Land	27,709	28,485	83	859	942	776
Other Land	458,829	460,001	338	1,510	1,848	1,172
Water Area	1,029	749	293	13	306	-280
Total Area Inventoried	**1,028,509**	**1,028,508**	**8,887**	**8,887**	**17,774**	**0**

Source: DOC 2010

Agriculture has been the single most important economic activity in the County throughout its history. The County recognizes the area as one of the finest agricultural areas in the world due to several environmental and cultural factors including good soils, a year-round growing season, the availability of adequate water transported from the Colorado River, extensive areas committed to agricultural production, a gently sloping topography, and a climate that is well-suited for growing crops and raising livestock. The Agricultural Element in the County General Plan demonstrates the long-term commitment by the County to the full promotion, management, use, and development and protection of agricultural production, while allowing logical, organized growth of urban areas (County of Imperial, as amended through 2008).

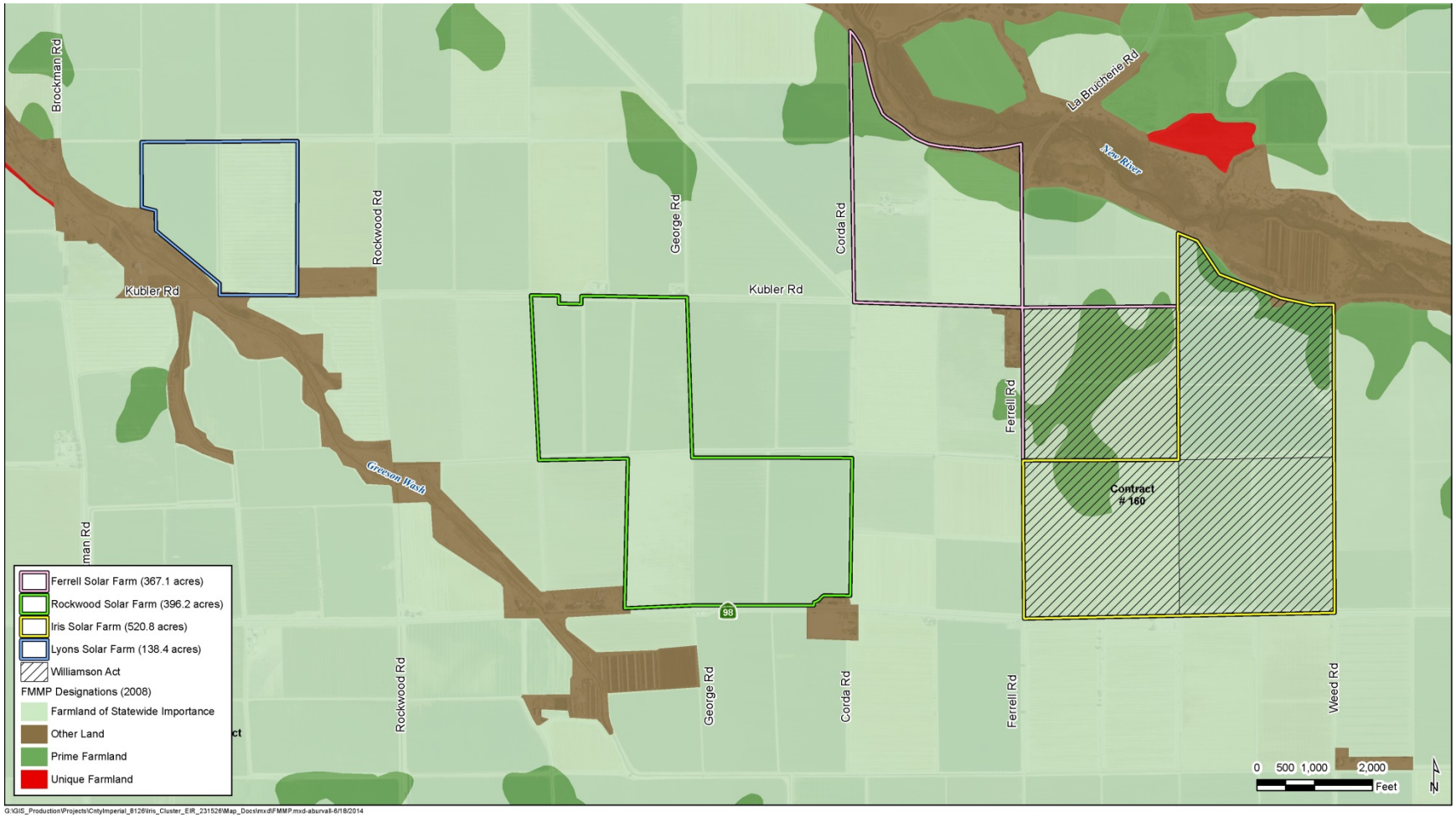
The County's Agricultural Element identifies several Implementation Programs and Policies for the preservation of agricultural resources. The Agricultural Element recognizes that the County can and should take additional steps to provide further protection for agricultural operations and at the same time provide for logical, organized growth of urban areas. The County must be specific and consistent about which lands will be maintained for the production of food and fiber and for support of the County's economic base. The County's strategy and overall framework for maintaining agriculture includes the following policy directed at the preservation of Important Farmland:

> The overall economy of the County is expected to be dependent upon the agricultural industry for the foreseeable future. As such, all agricultural land in the 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.

The following program is provided in the Agricultural Element:

> No agricultural land designated except as provided in Exhibit C shall be removed from the Agriculture category except where needed for use by a public agency, for geothermal purposes, where a mapping error may have occurred, or where a clear long-term economic benefit to the County can be demonstrated through the planning and environmental review process. The Board (or Planning Commission) shall be required to prepare and make specific findings and circulate same for 60 days (30 days for parcels considered under Exhibit C of this element) before granting final approval of any proposal, which removes land from the Agriculture category.

Figure 4.2-1. FMMP and Williamson Act Contracted Lands



Also, the following policy addresses Development Patterns and Locations on Agricultural Land:

> "Leapfrogging" or "checkerboard" patterns of development have intensified recently and result in significant impacts to the efficient and economic production of adjacent agricultural land. It is a policy of the County that leapfrogging will not be allowed in the future. All new non-agricultural development will be confined to areas identified in this plan for such purposes or in Cities' adopted Spheres of Influence, where new development must adjoin existing urban uses. Non-agricultural residential, commercial, or industrial uses will only be permitted if they adjoin at least one side of an existing urban use, and only if they do not significantly impact the ability to economically and conveniently farm adjacent agricultural land.

Agricultural Element Programs that address "leapfrogging" or "checkerboard" development include:

> All non-agricultural uses in any land use category shall be analyzed during the subdivision, zoning, and environmental impact review process for their potential impact on the movement of agricultural equipment and products on roads located in the Agriculture category, and for other existing agricultural conditions which might impact the projects, such as noise, dust, or odors.
>
> The Planning and Development Services Department shall review all proposed development projects to assure that any new residential or non-agricultural commercial uses located on agriculturally zoned land, except land designated as a Specific Plan Area, be adjoined on at least one entire property line to an area of existing urban uses. Developments that do not meet this criteria should not be approved.

Table 4.2-2 provides a General Plan goal and policy consistency evaluation for the projects.

County of Imperial Right to Farm Ordinance No. 1031

The purpose and intent of the County's Right to Farm 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 includes a requirement for disclosure of agricultural operations as part of real estate transactions that may occur in the vicinity of agricultural operations.

Imperial County Memorandum of Understanding Regarding Solar Generating and Transmission Facilities on Agricultural Lands

The Imperial County Planning Department prepared a Memorandum of Understanding (MOU) that was issued in September 2011 with the intent of providing clarification in relation to the County's review of solar projects proposed on agricultural lands. The MOU provides direction to applicants in terms of the standard conditions of approval and supporting mitigation requirements that will be applied to new solar projects proposed on agricultural lands within unincorporated portions of the County. This MOU provides specific direction in terms of mitigation requirements for non-prime and prime farmland, Williamson Act contracted lands, and fire protection for transmission facilities.

4.2.1.2 Existing Conditions

Agricultural Cropping Patterns

The proposed projects would be developed adjacent to productive agricultural lands. Much of the land base in the vicinity of and within the project study areas is considered productive farmland where irrigation water is available. Farming operations in this area generally consist of medium to large-scale crop production with related operational facilities. Crops generally cultivated in the area may include alfalfa, barley, and/or Bermuda grass in any given year. Row and vegetable crops (such as corn, melons, wheat) are also prominent in the area.

TABLE 4.2-2. PROJECT CONSISTENCY WITH APPLICABLE GENERAL PLAN AGRICULTURAL POLICIES

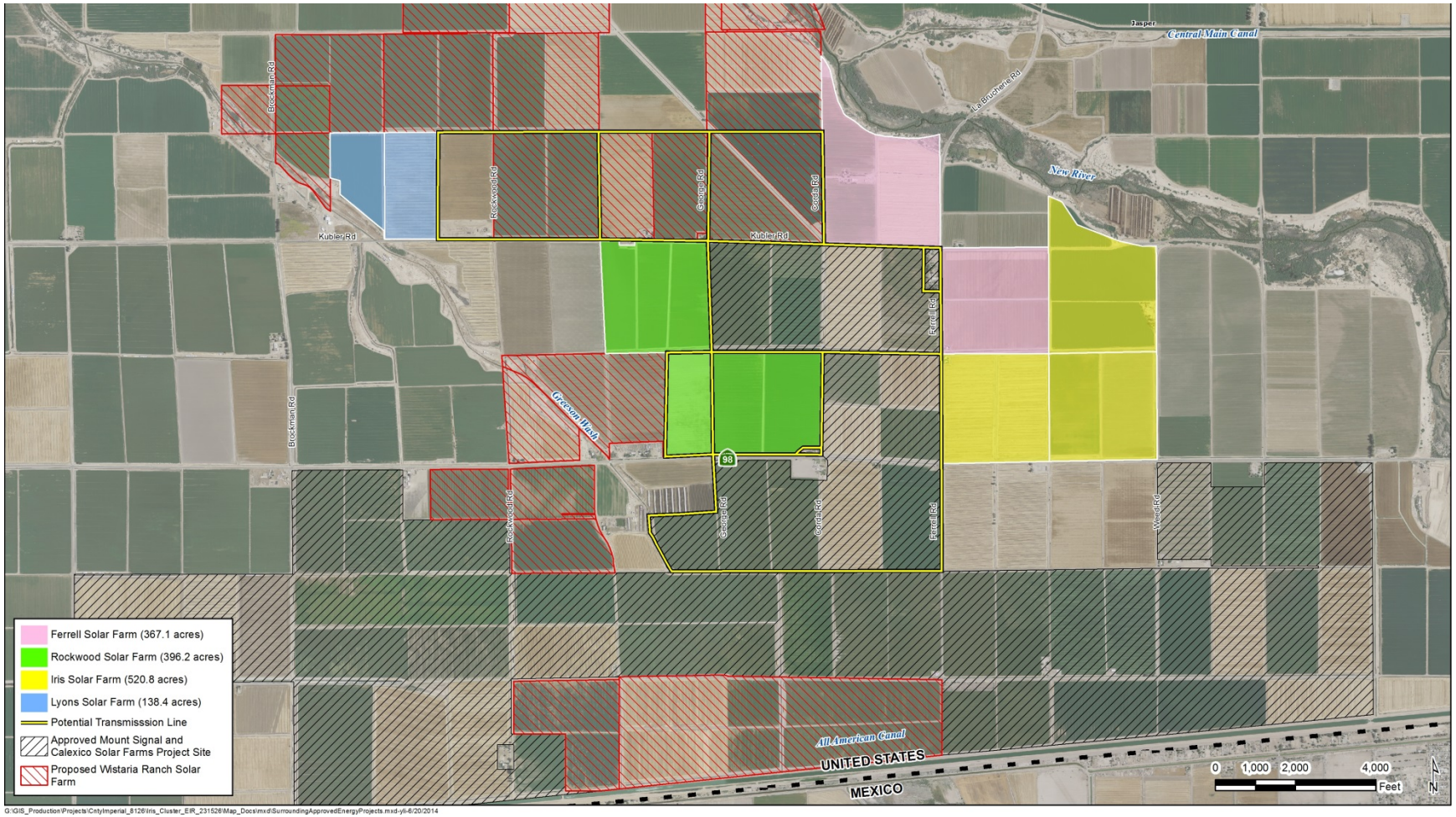
General Plan Policies	Consistency with General Plan	Analysis
Goal 1. All Important Farmland, including the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance, as defined by federal and state agencies, should be reserved for agricultural uses.	Consistent	The projects would temporarily convert land designated as Prime Farmland and Farmland of Statewide Importance to non-agricultural uses, but mitigation is provided to prevent a permanent conversion.
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.	Consistent	The projects would include development of solar facilities adjacent to productive agricultural lands; however, as shown on Figure 4.2-2, a majority of the currently vacant agricultural lands have been approved (or have been proposed) for the development of utility-scale solar energy projects, and are anticipated to transition into solar energy use over time. Therefore, the proposed projects would be compatible with the existing surrounding uses.
Objective 1.2. Encourage the continuation of irrigation agriculture on Important farmland.	Consistent	The projects would temporarily convert Important Farmland on-site to non-agricultural uses, but the projects' indirect impact reduces the need for Imperial Irrigation District (IID) to fallow irrigated lands elsewhere in the County to meet IID water conservation goals.
Objective 1.3. Conserve Important Farmland for continued farm related (non-urban) use and development while ensuring its proper management and use.	Inconsistent	The projects would result in the temporary conversion of Important Farmland to non-agricultural uses. This would be considered an adverse impact requiring mitigation. Restoration plans have been prepared for each of the project sites, which, when implemented, would return the sites to agricultural uses after the solar uses are discontinued.
Objective 1.4. Discourage the location of development adjacent to productive agricultural lands.	Consistent	The projects would include development of solar facilities adjacent to productive agricultural lands; however, as shown on Figure 4.2-2, a majority of the currently vacant agricultural lands have been approved (or have been proposed) for the development of utility-scale solar energy projects, and will transition into solar energy use over time. Additionally, this development would not include a residential component. The proposed projects are an allowable use within applicable agricultural zones (subject to approval of a Conditional Use Permit), and the existing zoning of the project study areas is consistent with the existing General Plan land use designation.
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.	Consistent	The projects would temporarily convert land designated as Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. However, with approval of a Conditional Use Permit, the proposed use would be consistent with Imperial County's Land Use Ordinance and thus is also consistent with the land use designation of the site. In addition, mitigation is required to prevent permanent conversion of valuable farmland. Restoration plans have been prepared for each of the project sites, which, when implemented, would return the sites to agricultural uses after the solar uses are discontinued.

General Plan Policies	Consistency with General Plan	Analysis
Objective 1.6. Recognize and preserve unincorporated areas of the County, outside the city sphere of influence areas, for irrigation agriculture, livestock production, aquaculture, and other special uses.	Consistent	The projects would temporarily convert land located in an unincorporated area to non-agricultural uses. However, with approval of a Conditional Use Permit, the projects would be considered an allowable use in an agricultural zone as a special use.
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 lack of alternative sites.	Consistent	The project study areas are designated as agriculture land uses. With approval of a Conditional Use Permit, the projects would be consistent with the County's Land Use Ordinance. Therefore, because the projects would be consistent with the Land Use Ordinance, it would also be consistent with the General Plan land use designation.
Goal 2. Adopt policies that prohibit "leapfrogging" or "checkerboard" patterns of nonagricultural development in agricultural areas and confine future urbanization to adopted Sphere of Influence area.	Consistent	The project study areas are designated for agriculture land use in the County General Plan. The projects would include development of solar facilities adjacent to productive agricultural lands; however, as shown on Figure 4.2-2, a majority of the currently vacant agricultural lands have been approved (or have been proposed) for the development of utility-scale solar energy projects, and are anticipated to transition into solar energy use over time. Additionally, this development would not include a residential component that would induce urbanization adjacent to the projects. Furthermore, with the approval of a Conditional Use Permit the projects would be consistent with the County's Land Use Ordinance. Consistency with the Land Use Ordinance implies consistency with the General Plan land use designation.
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.	Consistent	A majority of the currently vacant agricultural lands surrounding the proposed projects have been approved (or have been proposed) for the development of utility-scale solar energy projects, and are anticipated to transition into solar energy use over time. Neither construction nor operation of the solar facility would not make it difficult to economically or conveniently farm. After project implementation, the adjacent agricultural fields would remain contiguous to one another.
Objective 2.2. Encourage the infilling of development in urban areas as an alternative to expanding urban boundaries.	Consistent	The projects consist of the construction and operation of a solar facility. The projects are an industrial use and would not induce growth in the area nor result in the expansion of urban boundaries.
Objective 2.3. Maintain agricultural lands in parcel size configurations that help assure that viable farming units are retained.	Consistent	The projects would temporarily convert agricultural land to non-agricultural uses. However, the projects would not be subdivided into smaller parcels. The size of the existing parcels would be retained for future agricultural use following site restoration. Restoration plans have been prepared for each of the project sites, which, when implemented, would return the sites to agricultural uses after the solar uses are discontinued.

General Plan Policies	Consistency with General Plan	Analysis
Objective 2.4. Discourage the parcelization of large holdings.	Consistent	See response to Objective 2.3 above.
Objective 2.6. Discourage the development of new residential or other non-agricultural areas outside of city "sphere of influence" unless designated for non-agricultural use in the County General Plan, or for necessary public facilities.	Consistent	The projects are an allowable use within the agricultural zones of the property subject to approval of a Conditional Use Permit. Therefore, the projects are consistent with the agriculture land use designation of the General Plan.
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.	Consistent	With approval of a Conditional Use Permit, the projects would be an allowable use in agricultural zones. Additionally, the projects do not include the development of housing.
Objective 3.2. Enforce the provisions of the Imperial County Right-to-Farm Ordinance (No. 1031).	Consistent	The Imperial County Right-to-Farm Ordinance would be enforced.
Objective 3.3. Enforce the provisions of the State nuisance law (California Code Sub-Section 3482).	Consistent	The provisions of the State nuisance law would be incorporated into the projects.
Objective 3.5. As a general rule, utilize transitional land uses around urban areas as buffers from agricultural uses. Such buffers may include rural residential uses, industrial uses, recreational areas, roads, canals, and open space areas.	Consistent	The projects would include development of solar facilities adjacent to productive agricultural lands; however, as shown on Figure 4.2-2, a majority of the currently vacant agricultural lands have been approved (or have been proposed) for the development of utility-scale solar energy projects, and are anticipated to transition into solar energy use over time.
Objective 3.6. Where a development permit is sought adjacent to agricultural land use, protect agricultural operations by requiring appropriate buffer zones between the agricultural land and new developments, and then keep these zones aesthetically pleasing and free of pests by cleaning them of all garbage and noxious vegetation. Vegetation for the purpose of dust control shall be planted and maintained in an attractive manner. The buffer shall occur on the parcel for which the development permit is sought and shall favor protection of the maximum amount of farmland.	Consistent	The project applicant would implement a noxious weed control plan during the construction and operational phases of the projects. The burden of maintaining public roads falls upon the County of Imperial.

Source: County of Imperial General Plan, as amended through 2008.

Figure 4.2-2. Surrounding Utility-Scale Solar Energy Projects



Areas further to the north are also utilized for irrigated agricultural production and non-irrigated pasture for cattle grazing. However, as shown on Figure 4.2-2, a majority of the currently vacant agricultural lands surrounding the project study areas have been approved (or have been proposed) for the development of utility-scale solar energy projects, and are anticipated to transition into solar energy use over time. When surveyed as part of the biological resources assessment for the Iris Cluster Solar Farm, the project study areas were planted with Bermuda, alfalfa, sweet corn, melons, wheat, and sudan.

Farmland Quality

To assess the quality of the project study areas for agricultural cultivation, the LESA model[1] developed by the DOC was utilized for the FSF, RSF, ISF, and LSF. The LESA model is an approach used to rate the relative quality of land resources based upon six specific measureable features. Two land evaluation factors are based upon measures of soil resource quality. Four site assessment factors provide measures of a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. Based on the results for the LESA analysis, each of the four project study areas are classified as Important Farmland. The results of the LESA model for each of the four project study areas are provided in Appendix C.

Results obtained from the LESA model closely correlate with Important Farmland Maps produced by the DOC's FMMP. The 2008 Important Farmland maps for Imperial County indicate that a majority of the project study areas are comprised of Farmland of Statewide Importance. The FSF and ISF project study areas contain areas designated as Prime Farmland. These farmland designations are illustrated in Figure 4.2-1.

Prime Farmland, as defined by the U.S. Department of Agriculture (USDA), is farmland characterized by the best combination of physical and chemical features enabling it to sustain long-term agricultural production. Table 4.2-3 provides an acreage breakdown for the project study areas. Approximately 160.4 acres of Prime Farmland are classified within the project study areas. Farmland of Statewide Importance includes lands that are nearly Prime Farmland and may produce as high a yield as Prime Farmland when treated and managed according to acceptable farming methods. Some lands in this category may include those that are set aside by state law for agricultural purposes (DOC 2000). Approximately 1,250.7 acres of Farmland of Statewide Importance are classified within the project study areas. "Other Land" is defined as land not included in any other mapping category with common examples including 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. Approximately 11.3 acres of "Other Land" are classified within the project study areas.

TABLE 4.2-3. FMMP DESIGNATIONS WITHIN THE PROJECT STUDY AREAS

Land Use Category	Study Area	FSF	RSF	ISF	LSF
Prime Farmland	160.4	113.0	--	47.4	--
Farmland of Statewide Importance	1,250.7	245.5	396.1	471.7	137.4
Other Land	11.3	8.6	0.1	1.6	1.0
Total	**1,422.4**	**367.1**	**396.2**	**520.7**	**138.4**

Source: DOC 2008.

[1] LESA is a point-based approach for rating the relative importance of agricultural land resources based upon specific measurable features. LESA evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The project score becomes the basis for making a determination of a project's potential significance.

Soil Resources

The suitability of the local soil resource plays a crucial part in the determination of a plot's farmland designation. The land capability classification (LCC) system developed by the USDA, Natural Resources Conservation Service (NRCS), rates each of the soil types within the County in relation to its limitations for crop management. A soil rated as Class I is considered to have few limitations whereas a soil rated as Class VIII could have severe limitations that, in many circumstances, would preclude it from commercial crop production. According to the LESAs prepared for the projects, the project study areas are primarily comprised of soil types with LCC ratings of II and III, with soil wetness during winter months being the primary limitation to crop production.

Soils are also rated by the Storie Index, a numerical system expressing 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 which relate to the adequacy of a soil type for use in crop cultivation. The rating does not take into account other factors, such as the availability of water for irrigation, the climate, and the distance from markets. Values of the index range from 1 to 100 and are divided into six grades, with an index of 100 and a grade of 1 being the most suitable farmland. According to the LESAs prepared for the projects, the Storie Index for soil resources within the project study areas are generally classified as Grade 2 (Good) and 3 (Fair) with isolated areas classified as Grade 1 (Excellent).

4.2.2 Impacts and Mitigation Measures

This section presents the significance criteria used for considering project impacts related to agricultural resources, the methodology employed for the evaluation, an impact evaluation, and mitigation requirements, if necessary.

4.2.2.1 Thresholds of Significance

Based on CEQA Guidelines Appendix G, project impacts related to agricultural resources are considered significant if any of the following occur:

- Convert economically viable 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;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract in an area in which continued agriculture is economically viable;
- Involve other changes in the existing environment that, due to their location or nature, could individually or cumulatively result in loss of economically viable Farmland, to non-agricultural uses; or
- Impair agricultural productivity of the project site or use of neighboring areas.

4.2.2.2 Methodology

This analysis evaluates the potential for the projects, as described in Chapter 3, Project Description, to adversely impact agricultural resources within the project study areas based on the applied significance criteria as identified above. This analysis utilizes the LESA model in conjunction with other readily available information sources in assessing impacts on agriculture and farmland. As indicated in the environmental setting, four LESA models have been prepared that address each one of the projects (addressing the FSF, RSF, ISF, and LSF site locations). These reports are included as Appendix C. The analysis prepared for this EIR also relied on NRCS soil survey data, Important Farmland maps for Imperial County prepared by the State, and Williamson Act contract maps prepared by Imperial County. A combination of these sources was used to determine the agricultural significance of the lands in the project study areas.

Additionally, potential conflicts with existing agricultural zoning, incompatibility with existing Williamson Act contracts, or other changes resulting from the implementation of the projects, which could indirectly remove Important Farmland from agricultural production or reduce agricultural productivity were considered. Sources used in this evaluation included, but were not limited to, the Imperial County General Plan, as amended through 2008, and zoning ordinance. Additional background information on land uses was obtained through field review and consultation with appropriate agencies. Conceptual site plans for the projects were also used to evaluate potential impacts. These conceptual exhibits are provided in Figures 3.0-6 through 3.0-9.

4.2.2.3 Impact Analysis

Impact 4.2-1 *Conversion of Important Farmlands to Non-Agricultural Use.*

Implementation of the projects would result in the conversion of economically viable Important Farmland, including Prime Farmland and Farmland of Statewide Importance, to non-agricultural uses.

Iris Cluster (FSF, RSF, ISF, and LSF)

Implementation of the projects as a whole would result in the temporary conversion of approximately 1,422 acres of land currently under or available for agricultural production to non-agricultural uses. Approximately 160 acres of the project study areas are classified as Prime Farmland with 1,251 acres identified as Farmland of Local Importance (see Table 4.2-3). The remaining 11 acres is identified as Other Land (see Table 4.2-3). The loss of agricultural land designated Prime Farmland and Farmland of Statewide Importance is typically considered a significant impact under CEQA.

To verify these farmland designations, the LESA model was used with the results provided in Appendix C. Based on the LESA's scoring methodology, a site scoring of 60 points or higher is typically considered "significant." The LESA scoring for the site locations analyzed in conjunction with the projects are provided in Table 4.2-4. As shown, the LESA scores for the projects support the farmland designations as identified in the FMMP. Hence, their conversion to non-agricultural use, albeit temporary, is considered a **significant impact**. Implementation of Mitigation Measure 4.2-1a would reduce these impacts to a level **less than significant**.

TABLE 4.2-4. LESA SCORING FOR THE STUDY AREA

Site Component	LESA Score	LE Factors[1]	SA Factors[2]	Significant?
FSF	75.71	32.21	43.50	Yes
RSF	71.06	26.06	45.00	Yes
ISF	72.75	29.25	43.50	Yes
LSF	69.29	27.29	42.00	Yes

Source: Environmental Management Associates 2013.
Notes: 1. Land evaluation (LE) includes soil LCC and Storie Index.
2. Site assessment (SA) factors include water availability, project size, and Surrounding Agricultural Land & Surrounding Protected Resource Land.

As provided in Section 4.2.1.1 and Chapter 3, the project applicant would be required to restore the project study areas following project operations, therefore agricultural uses would be possible in the future. Given that the project facilities would be constructed near the existing grade, restoration of the project study areas to facilitate future cultivated agriculture would generally be feasible. However, with the projects, there would be a 40-year period where existing agricultural uses within the project study areas would no longer be possible until the site is restored. Additionally, although the project applicant is proposing agriculture as the proposed end use, it is possible that project-related activities (e.g., soil disturbance) and subsequent restoration of the site could result in a net reduction in Prime Farmland or Farmland of Statewide Importance within the project study areas. These acreage reductions could occur through alterations in soil productivity or the retention of project-related structures. Restoration plans have

been prepared for each of the project sites that provide guidance and performance criteria to ensure that no net reduction in Important Farmland occurs (see Appendix L). A short-term and potentially long-term net reduction in either of these two farmland classifications within the project study areas would be considered a **significant impact**. Implementation of Mitigation Measure 4.2-1b would reduce these impacts to a level **less than significant**. This measure will ensure that the project applicant adheres to the terms of the agricultural restoration plans prepared for each of the project sites.

FSF

The impacts described for the combined projects would be similar to impacts that could occur for the FSF site component; however, these impacts would occur at both a reduced severity and intensity. Development of the FSF would be limited to 367.1 acres. The build-out of the FSF would include the conversion of approximately 113 acres of Prime Farmland, 245.5 acres of Farmland of Statewide Importance, and 8.6 acres of Other Land. Similar to the discussion for the Iris Cluster, the conversion of these lands, albeit temporary, is considered a **significant impact**. Given that construction-related activities (e.g., soil disturbance) and subsequent restoration of the FSF site would result in a short-term and potentially long-term net reduction in Prime Farmland or Farmland of Statewide Importance acreages, this impact is considered significant. Implementation of Mitigation Measures 4.2-1a and 4.2-1b would reduce this impact to a level **less than significant**.

RSF

The impacts described for the combined projects would be similar to impacts that could occur for the RSF site component; however, these impacts would occur at both a reduced severity and intensity. Development of the RSF would be limited to 396.2 acres. Additionally, no Prime Farmland is designated within RSF. The build-out of the RSF would include the conversion of approximately 396.1 acres of Farmland of Statewide Importance and 0.1 acres of other land. Similar to the discussion for the Iris Cluster, the conversion of these lands, albeit temporary, is considered a **significant impact**. Given that construction-related activities (e.g., soil disturbance) and subsequent restoration of the RSF site would result in a short-term and potentially long-term net reduction in Farmland of Statewide Importance acreages, this impact is considered significant. Implementation of Mitigation Measures 4.2-1a and 4.2-1b would reduce this impact to a level **less than significant**.

ISF

The impacts described for the combined projects would be similar to impacts that could occur for the ISF site component; however, these impacts would occur at both a reduced severity and intensity. Development of the ISF would be limited to 520.7 acres. The build-out of the ISF would include the conversion of approximately 47.4 acres of Prime Farmland, 471.7 acres of Farmland of Statewide Importance, and 1.6 acres of Other Land. Similar to the discussion for the Iris Cluster, the conversion of these lands, albeit temporary, is considered a **significant impact**. Given that construction-related activities (e.g. soil disturbance) and subsequent restoration of the ISF site would result in a short-term and potentially long-term net reduction in Prime Farmland or Farmland of Statewide Importance acreages, this impact is considered significant. Implementation of Mitigation Measures 4.2-1a and 4.2-1b would reduce this impact to a level **less than significant**.

LSF

The impacts described for the combined projects would be similar to impacts that could occur for the LSF site component; however, these impacts would occur at both a reduced severity and intensity. Development of the LSF would be limited to 138.4 acres. Additionally, no Prime Farmland is designated within LSF. Nevertheless, the build-out of the LSF would include the conversion of approximately 137.4 acres of Farmland of Statewide Importance and 1.0 acres of Other Land. Similar to the discussion for the Iris Cluster, the conversion of these lands, albeit temporary, is considered a **significant impact**. Given that construction-related activities (e.g. soil disturbance) and subsequent restoration of the LSF site would

result in a short-term and potentially long-term net reduction in Farmland of Statewide Importance acreages, this impact is considered significant. Implementation of Mitigation Measures 4.2-1a and 4.2-1b would reduce this impact to a level **less than significant**.

Transmission Line

The project applicant would locate transmission towers along the fringe (or edge) of agricultural fields to minimize disruptions to Important Farmlands and facilitate future agricultural use following restoration of the project study areas. It should be noted that portions of the proposed transmission line route would overlap with the approved Calexico Solar Farm 2 Phase B and Mount Signal Solar Farm 1 projects, and therefore no additional acreages of Important Farmland would be impacted beyond those acreages described in the previously approved Mount Signal and Calexico Solar Farm Projects EIR. Once in operation, agricultural activities would be feasible within the new right-of-way to the extent practical and where solar arrays are not constructed. Based on these considerations, the transmission lines associated with the Iris Cluster Solar Farm Project would not result in the conversion of Important Farmland to non-agricultural use and the impact would be **less than significant**.

Mitigation Measure(s)

The following mitigation measures are required for the FSF, RSF, ISF, and LSF.

4.2-1a **Payment of Agricultural and Other Benefit Fees.** One of the following options included below is to be implemented prior to the issuance of a grading permit or building permit (whichever is issued first) for the Project:

A. Mitigation for Non Prime Farmland.

Option 1: ***Provide Agricultural Conservation Easement(s).*** The Permittee shall procure Agricultural Conservation Easements on a "1 to 1" basis on land of equal size, of equal quality farmland, outside the path of development. The conservation easement shall meet DOC regulations and shall be recorded prior to issuance of any grading or building permits.

Option 2: ***Pay Agricultural In-Lieu Mitigation Fee.*** The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 20 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 programs 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: ***Public Benefit Agreement.*** 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 in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy.

B. Mitigation for Prime Farmland.

Option 1: Provide Agricultural Conservation Easement(s). Agricultural Conservation Easements on a "2 to 1" basis on land of equal size, of equal quality farmland, outside the path of development. The Conservation Easement shall meet DOC regulations and shall be recorded prior to issuance of any grading or building permits; or

Option 2: Pay Agricultural In-Lieu Mitigation Fee. The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 30% 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: Public Benefit Agreement. The Permittee and County 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 in 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 the local economy for the purpose of off-setting jobs displaced by this Project.

Option 4: Avoid Prime Farmland. The Permittee must revise their CUP Application/Site Plan to avoid Prime Farmland.

4.2-1b **Site Restoration Plan.** The DOC has clarified the goal of a reclamation and decommissioning plan: the land must be restored to land which can be farmed. In addition to MM 4.2.1a for Prime Farmland and Non-Prime Farmland, the Applicant shall submit to Imperial County a Reclamation Plan prior to issuance of a grading permit. The Reclamation Plan shall document the procedures by which each CUP will be returned to its current agricultural condition/LESA score of 75.71 for FSF, 71.06 for RSF, 72.75 for ISF, and 69.29 for LSF. Permittee also shall provide financial assurance/bonding in the 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.

Significance After Mitigation

With the implementation of Mitigation Measure 4.2-1a, the project applicant would be required to minimize the permanent loss of valuable farmlands through either provision of an agricultural conservation easement, payment into the County agricultural fee program, or entering into a public benefit agreement. Mitigation Measure 4.2-1b will ensure that the project applicant adheres to the terms of the agricultural restoration plans prepared for each of the project sites, which would address the temporary conversion impact. This mitigation measure would reduce the impact on Important Farmlands, including Prime Farmland, to a **less than significant** level.

IMPACT 4.2-2 *Result in the Non-Renewal or Cancellation of an Active Williamson Act Contract.*

The projects could conflict with the existing agricultural zoning for the project study areas or with the provisions of an existing Williamson Act contract.

Iris Cluster (FSF, RSF, ISF, and LSF) and Transmission Line

Williamson Act. As previously indicated in Section 4.2.1.1, the project study areas contain three active Williamson Act Contracts. These active contracts occur within FSF and ISF; however, petitions for cancellation have been filed for each of these active contracts by the associated landowners. Additionally, there are properties surrounding the project study areas under active Williamson Act Contracts (see Figure 4.2-1). As such, any activities associated with the projects that could create disincentives for adjacent properties to keep renewing their existing contracts would be considered significant. However, given that final land uses following the projects useful lifecycle would consist of agricultural uses, no new growth pressures are anticipated as a direct consequence of the projects. For this reason, the indirect impact of the projects on adjacent contracted lands is considered **less than significant**.

The Imperial County Board of Supervisors recently voted to not renew existing Williamson Act Contracts within the County due to the State's decision to discontinue funding for the program. This essentially means that all Williamson Act contracts in Imperial County will terminate on or before December 31, 2018. Although there remains a possibility that the State' will reinstate funding for Williamson Act subventions, the fact the Board of Supervisors has already voted to discontinue funding for the program brings into question the continuation of the Williamson Act program within Imperial County. Although, landowners do have the option to protest the non-renewal, this option only allows them to keep their Williamson Act value until there is less than six years remaining in the non-renewal phase-out. Beyond four years, current tax incentives would no longer apply. Based on these circumstances, each of the active Williamson Act contracts could theoretically be in non-renewal status prior to project approval.

Nevertheless, the projects would require the cancellation of three active Williamson Act Contracts and, based on the applied significance criteria, this would be considered a **significant impact**. Further, it is important to understand that the cancellation process must be initiated by the properly owner. Given that the properties currently under the provision of the Williamson Act would be leased by the project applicant and, therefore, the burden of cancellation or non-renewal would be placed on the landowner. Additionally, per Government Code Section 51282(a), the County Board of Supervisors is required to make certain findings prior to tentative approval for the cancellation of a contract. Based on these considerations and the fact that petitions for cancellation have already been filed with the County, the projects' potential conflicts within the provisions of the Williamson Act are considered significant. Implementation of Mitigation Measure 4.2-1b and completion of the Williamson Act Cancellation process in accordance with Government Code Section 51282(a) would reduce this impact to a level **less than significant**.

Agricultural Zoning. Pursuant to the County General Plan, the project study areas are located on land designated for agricultural uses. The solar energy facility components of the projects would be constructed on lands currently zoned A-2 (General Agriculture), A-2-R (General Agricultural Rural Zone), or A-3 (Heavy Agriculture). Solar energy plants are allowed uses within these zones, subject to the approval of a CUP. Upon approval of a CUP, the projects' use would be consistent with the Imperial County Land Use Ordinance and thus is also consistent with the General Plan land use designation of the site. Additionally, the operation of the solar generating facilities is not expected to inhibit or adversely affect adjacent agricultural operations through the placement of sensitive lands uses, generation of excessive dust or shading, or place additional development pressures on adjacent areas. Based on these considerations, the impact is considered **less than significant**.

Significance After Mitigation

With the implementation of Mitigation Measure 4.2-1b, the project applicant would be required to restore the project study areas to an agricultural use through the implementation of site restoration plans. Therefore, the implementation of Mitigation Measure 4.2-1b and adherence to the Williamson Act

Cancellation process in accordance with Government Code Section 51282(a) would reduce impacts related to the conversion of Williamson Act contracted land to a **less than significant** level.

IMPACT 4.2-3 *Result in Other Effects that could Contribute to the Conversion of Active Farmlands to Non-Agricultural Use.*

The projects could result in direct and indirect impacts to adjacent agricultural lands that could indirectly contribute to conversion of active farmland to non-agricultural use.

Iris Cluster (FSF, RSF, ISF, and LSF)

The Agricultural Element of the County's General Plan serves as the primary policy statement for implementing development policies for agricultural land use in Imperial County. The goals, objectives, implementation programs, and policies found in the Agricultural Element provide direction for private development as well as government actions and programs. A summary of the relevant Agricultural goals and objectives and the projects' consistency with applicable goals and objectives is summarized in Table 4.2-2. As provided, the projects are generally consistent with certain Agricultural Element Goals and Objectives of the County General Plan, but mitigation is required for the projects.

Per County policy, 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. Further, no agricultural land designated except as provided in Exhibit C shall be removed from the agriculture category except where needed for use by a public agency, for geothermal purposes, where a mapping error may have occurred, or where a clear long-term economic benefit to the County can be demonstrated through the planning and environmental review process. As discussed under Impact 4.2-1, although the projects would convert lands currently under agricultural production, the project applicant is proposing agriculture as the end use and has prepared a site-specific Restoration Plan to minimize impacts related to short- and long-term conversion of farmland to non-agricultural use. Additionally, the County is requiring Mitigation Measure 4.2-1b to ensure that post-restoration of the project-facilitates result in no net reduction in Prime Farmland or Farmland of Statewide Importance. These measures in conjunction with project design features would be required to ensure the projects' consistency with applicable County General Plan goals and objectives. With implementation of Mitigation Measure 4.2-1b, this impact would be reduced to a level **less than significant**.

The nature of the projects warrants that they be located adjacent to existing electrical transmission infrastructure. Transmission infrastructure is currently under construction as part of the recently approved Mount Signal and Calexico Solar Farm Projects. The proposed projects would develop solar facilities adjacent to productive agricultural lands. A majority of the currently vacant agricultural lands surrounding the project study areas have been approved (or have been proposed) for the development of utility-scale solar energy projects, and are anticipated to transition into solar energy use over time. The project study areas are located adjacent to three solar farms including the previously-approved Mount Signal and Calexico Solar Farm Projects, and the proposed Wistaria Ranch Solar Farm. The project study areas border the Calexico II-B and Wistaria Ranch Solar Farms on three sides. Development of the projects would not contribute to a "leapfrogging" pattern of development. Also, the use of the agricultural land is not considered permanent given that the project applicant will be conditioned to restore the project study areas back to agricultural use. In this context, the projects would be consistent with applicable General Plan policies and is considered **less than significant**.

The projects would not directly impact the movement of agricultural equipment on roads located within the agriculture category and access to existing agriculture-serving roads would not be precluded or hindered by the projects. No modifications to roadways are proposed in the study areas that would otherwise affect other agricultural operations in the area. Furthermore, existing nuisance issues such as noise, dust, and odors from existing agricultural use would not impact the projects given the general lack of associated sensitive uses (e.g. residences). Likewise, with mitigation measures proposed in other resource sections (e.g. air quality, noise, etc.) project-related activities would not adversely affect adjacent agricultural operations. Additionally, the projects would not develop infrastructure that would attract or encourage

new development of adjacent farmlands. Further, the provisions of the Imperial County Right-to-Farm Ordinance (No. 1031) and the State nuisance law (California Code Sub-Section 3482) would continue to be enforced. Based on these considerations, the projects are not expected to adversely impact adjacent landowners' abilities to economically and conveniently farm adjacent agricultural land and the impact is considered **less than significant**.

Transmission Line

The installation of the proposed transmission line is not expected to preclude agricultural activities within the right-of-way. The result impact is considered **less than significant**.

Mitigation Measure(s)

The following mitigation measures are required for the FSF, RSF, ISF and LSF.

- Implement Mitigation Measure 4.2-1b.

Significance After Mitigation

With the implementation of Mitigation Measure 4.2-1b, the project applicant would be required to adhere to the terms of the agricultural restoration plans prepared for each of the project study areas. Implementation of Mitigation Measure 4.2-1b would reduce this impact to a **less than significant** level.

IMPACT 4.2-4 *Adversely Affect Agricultural Productivity.*

The projects could impair the agricultural productivity of the project study areas or use of neighboring areas for agricultural use.

Iris Cluster (FSF, RSF, ISF, and LSF)

Agricultural productivity of the project study areas could be reduced as a result of the projects, even after final restoration of individual site components. The combination of planting on reintroduced, stockpiled topsoil or directly on subsoil materials could affect future cultivation of the individual site components and their associated rating under the FMMP.

As indicated in Chapter 3, the project applicant has prepared site restoration plans for each of the individual project sites. In any land restoration project, it is necessary to minimize disruption to topsoil or stockpiled topsoil for later use during restoration following project decommissioning. As previously noted in the setting discussion, soil resources within the study areas have a LCC rating ranging from II to III. Based on these classifications, one may conclude that on-site soil resources rank relatively high in terms of their suitability for agricultural cultivation (e.g., effective rooting depth, soil texture, nutrient holding capacity, etc.). With the implementation of the projects, it is possible that the physical and chemical makeup of the soil materials within the upper soil horizon may change during construction and associated stockpiling operations. Improper soil stockpiling and management of the stockpiles could result in increased decomposition of soil organic materials, increased leaching of plant-available nitrogen, and depletion of soil biota communities (e.g., Rhizobium or Frankia). Each of these circumstances could have an adverse effect on the future productivity of the restored soils. Any reductions in agricultural productivity could significantly limit the types of crops (e.g., deeper rooting crops, orchards, etc.) that may be grown within the project study areas in the future. This is considered a **significant impact** attributable to the projects. Implementation of Mitigation Measure 4.2-1b would reduce this impact to a level less than significant. Additionally, there is the potential that weeds or other pests may occur within the solar fields if these areas are not properly maintained and managed to control weeds and pests. This is considered a **significant impact.** Implementation of Mitigation Measure 4.2-2 would reduce this impact to a level **less than significant**.

Transmission Line

The installation of the proposed transmission line would result in minimal to no impact on the agricultural activity, since agricultural operations could be facilitated within the right-of-way. The result impact is considered **less than significant**.

Mitigation Measure(s)

The following mitigation measures are required for the FSF, RSF, ISF, LSF, and transmission line.

4.2-2 Prior to the issuance of a grading permit or building permit (whichever occurs first), a Weed and Pest Control Plan shall be developed by the project applicant and approved by the County of Imperial Agricultural Commissioner. The plan shall provide the following:

1. Monitoring, preventative, and management strategies for weed and pest control during construction activities at any portion of the project (e.g., transmission line);
2. Control and management of weeds and pests in areas temporarily disturbed during construction where native seed will aid in site revegetation as follows;
    - Monitor for all pests including insects, vertebrates, weeds, and pathogens. Promptly control or eradicate pests when found, or when notified by the Agricultural Commissioner's office that a pest problem is present on the project site;
    - All treatments must be performed by a qualified applicator or a licensed pest control operator;
    - "Control" means to reduce the population of common pests below economically damaging levels, and includes attempts to exclude pests before infestation, and effective control methods after infestation. Effective control methods may include physical/mechanical removal, bio control, cultural control, or chemical treatments;
    - Notify the Agricultural Commissioner's office immediately regarding any suspected exotic/invasive pest species such as A- and Q-rated pest species as defined by the California Department of Food Agriculture (CDFA). Eradication of exotic pests shall be done under the direction of the Agricultural Commissioner's Office and/or CDFA;
    - Obey all pesticide use laws, regulations, and permit conditions;
    - Access shall be allowed by Agricultural Commissioner staff for routine visual and trap pest surveys, compliance inspections, eradication of exotic pests, and other official duties;
    - All project employees that handle pest control issues shall be appropriately trained and certified, and all required records shall be maintained and made available for inspection. All required permits shall be maintained current;
    - Records of pests found and controlled shall be maintained and available for review, or submitted to the Agricultural Commissioner's office on a quarterly basis;
3. A long-term strategy for weed and pest control and management during the operation of the proposed project. Such strategies may include, but are not limited to:
    a. Use of specific types of herbicides and pesticides on a scheduled basis.
4. Maintenance and management of project site conditions to reduce the potential for a significant increase in pest-related nuisance conditions on adjacent agricultural lands.

Significance After Mitigation

With the implementation of Mitigation Measures 4.2-1b and 4.2-2, the project applicant would be required to adhere to the terms of the comprehensive restoration plan that would restore the project study areas to their existing conditions and reintroduce agricultural uses on the sites following decommissioning of the projects (after their use for solar generation activities) and implement a weed and pest control plan. Compliance with these measures would reduce this impact to a level **less than significant**.

4.2.3 Decommissioning/Restoration and Residual Impacts

Decommissioning/Restoration

As indicated in Chapter 3 and required by Mitigation Measure 4.2-1b, the project applicant shall adhere to the terms of the site restoration plan that has been submitted to Imperial County to return the property to its existing agricultural condition. In any land restoration project, it is necessary to minimize disruption to topsoil or stockpiled topsoil for later use during restoration following project decommissioning. As previously noted in the setting discussion, soil resources within the project study areas have a LCC rating ranging from II to III. Based on these classifications, one may conclude that on-site soil resources rank relatively high in terms of their suitability for agricultural cultivation (e.g., effective rooting depth, soil texture, nutrient holding capacity, etc.). With the implementation of the projects, it is possible that the physical and chemical makeup of the soil materials within the upper soil horizon may change during construction and associated stockpiling operations. Improper soil stockpiling and management of the stockpiles could result in increased decomposition of soil organic materials, increased leaching of plant-available nitrogen, and depletion of soil biota communities (e.g., Rhizobium or Frankia). Each of these circumstances could have an adverse effect on the future productivity of the restored soils. Any reductions in agricultural productivity could significantly limit the types of crops (e.g., deeper rooting crops, orchards, etc.) that may be grown within the project study areas in the future. This is considered a **significant impact** attributable to the projects. However, implementation of Mitigation Measure 4.2-1b would reduce this impact to a level **less than significant**.

Residual

With mitigation, issues related to the conversion of Important Farmland to non-agricultural use would be mitigated and reduced to a less than significant level. Operation of the projects, subject to the approval of a CUP, would generally be consistent with applicable federal, state, regional, and local plans and policies. Although the projects would require the non-renewal or cancellation of one or more active Williamson Act contracts, the mitigation prescribed in this section would reduce the physical impact associated with the cancellation of such contracts. Following the proposed use (e.g., solar facilities), the projects would be decommissioned and project study areas restored to facilitate agricultural cultivation. Based on these circumstances, the projects would not result in any residual significant and unmitigable impacts to agricultural resources.