



State of California • Natural Resources Agency
Department of Conservation
Division of Land Resource Protection
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Edmund G. Brown Jr., *Governor*
Kathryn M. Lyddan, *Division Director*

June 28, 2019

VIA EMAIL: DIANAROBINSON@CO.IMPERIAL.CA.US

Ms. Diana Robinson
Imperial County
Planning and Development Services Department
801 Main Street,
El Centro CA, 92243

Governor's Office of Planning & Research

JUNE 28 2019

STATE CLEARINGHOUSE

Dear Ms. Robinson:

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE DREW SOLAR PROJECT,
SCH# 2018051036

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation submitted by Imperial County (County) for the Drew Solar Project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

The proposed project consists of a photovoltaic solar facility capable of producing approximately 100 megawatts of alternating current energy storage and generation interconnection transmission lines on 762.8 net acres. Generation interconnection transmission lines will extend from the south end of the project site south across Drew Road and State Route 98 into the existing Drew Switchyard. The project site is located on six parcels approximately 6.5 miles southwest of the City of El Centro, California and 7.5 miles directly west of Calexico, California.

The project site is: zoned agriculture, currently under agricultural production and is designated as Prime Farmland and Farmland of Statewide Importance according to the most recent Important Farmland Map produced by the Department of Conservation's Farmland Mapping and Monitoring Program¹.

Department Comments

The Department is pleased to see the County offers so many choices in terms of agricultural mitigation, and the option to purchase agricultural easements at either a 1:1 or 2:1 ratio of easement to impacted agricultural land. However, the Department is concerned that under option two and/or three, the required 20 or 30 percent fair market value fee may not be enough for the County to mitigate at these same 1:1 or 2:1 levels.

¹ Department of Conservation, Farmland Mapping and Monitoring Program, California Important Farmland Finder, 2014, <https://maps.conservation.ca.gov/DLRP/CIFF/>

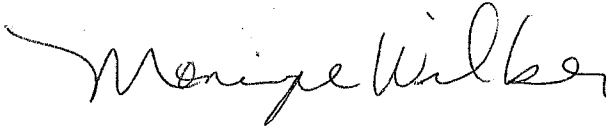
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The Department advocates the use of permanent agricultural conservation easements on land of at least equal quality and size as mitigation for the loss of agricultural land. Conservation easements will protect remaining land resources and mitigate the project impacts in accordance with CEQA Guideline § 15370. The Department highlights agricultural conservation easements because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA. Agricultural conservation easements are an available mitigation tool and should always be considered; however, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Conclusion

Thank you for giving us the opportunity to comment on the Draft Environmental Impact Report for the Drew Solar Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Monique Wilber". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Monique Wilber
Conservation Program Support Supervisor