IV.12 AGRICULTURAL LAND AND PRODUCTION

The analysis in this chapter addresses the potential impacts to agricultural resources from implementation of the Desert Renewable Energy Conservation Plan (DRECP or Plan) alternatives. This analysis is based on descriptions of Covered Activities (outlined in Volume II, Description of Proposed Action and Alternatives) on both federal and nonfederal lands. Existing conditions for agricultural resources appear in Volume III (III.12). Grazing is addressed separately in Chapter IV.16 (Livestock Grazing). Agricultural land potentially affected by project alternatives is shown in Figures IV.12-1 through IV.12-6. (Figures are presented at the end of this chapter.)

Please note that impacts related to private lands within the reserve design only apply where landowners either voluntarily sell or donate their properties (or partial interests in their properties) so that Permittees, agencies, or land trusts can implement mitigation.

IV.12.1 Approach to Impact Analysis

IV.12.1.1 General Methods

This analysis relies on data from the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), and from DOC on enrollment under the California Land Conservation Act of 1965, known as the Williamson Act. The majority of the Plan Area, or 78%, has not been mapped by the FMMP because it is either public land or very remote. Because this analysis relies on FMMP data, there may be some farmlands in some Development Focus Areas (DFAs) or Conservation Planning Areas that are not addressed here. In addition, the status of some farmland may have changed since the 2010 mapping that was used for this analysis. However, site-specific analysis and local permitting processes would determine when Important Farmland would be affected. If unmapped Important Farmland would be affected by a project proposed by a DRECP permittee, the mitigation measures in this section would apply.

This analysis focuses on potential future solar, wind, geothermal, and transmission development within DFAs, and on Bureau of Land Management (BLM) Land Use Plan Amendment (LUPA) decisions that could either convert Important Farmland or conflict with Williamson Act contracts. There could be transmission development outside the DFAs, but it would be subject to Plan permitting and management conditions. This analysis includes the following assumptions:

- Agricultural activities would be excluded from areas developed for utility-scale solar and geothermal energy production, but may be compatible with some wind and transmission development.

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1 Approximately 20,000 acres listed as “Important Farmland” and “Farmland of Local Importance” under the DOC’s FMMP overlaps BLM-managed land within the DRECP area. The DOC FMMP designations do not apply to BLM-managed land therefore; these acres are not included in this analysis.
• Reserve design and its associated biological resources conservation and Conservation and Management Actions (CMAs) would eliminate agriculture from Reserve Design Lands.

• Williamson Act contracts apply only to privately owned land. There are therefore no Williamson Act lands within either BLM LUPA or other federal or tribal lands.

• Development of solar and geothermal projects is generally not compatible with Williamson Act contracts. Williamson Act contracts would therefore have to be cancelled on currently enrolled land.

• Development of transmission is generally compatible with Williamson Act contracts. Wind project development may also be compatible with Williamson Act contracts, depending upon county policies.

• Reserve Design Lands would be compatible with Williamson Act contracts.

Two types of impacts are assessed in this chapter: impacts from the conversion of agricultural land to renewable energy development, and impacts from renewable energy facilities on adjacent agricultural operations. The first is determined by assessing how much Important Farmland and Williamson Act land would be affected within the DFAs for each alternative. The second impact type is assessed only generally and qualitatively.

IV.12.1.2 CEQA Standards of Significance

The California Environmental Quality Act (CEQA) Guidelines define “significant effect on the environment” as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance” (Guidelines Section 15382). CEQA has established the following standards for determining the significance of impacts to agricultural resources. These standards address whether a proposed project could:

• Convert Prime Farmland, Unique Farmland, or Important Farmland (as shown on the maps prepared pursuant to the FMMP) to nonagricultural use.

• Conflict with existing zoning for either agricultural use or Williamson Act contracts.

• Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of farmland to nonagricultural use.

This analysis combines these checklist questions to establish two significance standards:

• AG-1: Would the change convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts?
• AG-2: Would the change involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations?

**IV.12.2 Typical Impacts Common to All Action Alternatives**

The potential effects of renewable energy development (solar, wind, and geothermal) and its associated right-of-way (ROW) requirements (major transmission, generator tie-lines [gen-ties], and substations) on Important Farmland were assessed, in part, through review of the Solar Programmatic Environmental Impact Statement (EIS), the Wind Programmatic EIS, and the Geothermal Programmatic EIS. Plan alternatives would result in future renewable energy development applications within identified DFAs, and each project would undergo individual National Environmental Policy Act (NEPA) and/or CEQA impact analysis. Impacts related to renewable energy projects and their associated facilities would vary depending upon the proposed technology, location of project area, time and degree of disturbance from development, and the size and complexity of the facilities.

**IV.12.2.1 Impacts of Renewable Energy and Transmission Development**

Both agricultural land conversion and impacts to adjacent agricultural operations could affect high-quality agricultural soils. There are many ways to assess and define agricultural soil quality. Because of the scope of this high-level analysis, this document relies only on Farmland Mapping and Monitoring Program (FMMP) farmland classifications. FMMP farmland classifications are based partly on soil quality and partly on agricultural use. The FMMP designates Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance; for purposes of this analysis, all are collectively considered as “Important Farmland.”

Methods of land use impact calculations are described in detail in Volume II. Acreage impacts were calculated based on the target megawatts (MWs) for each technology type, along with other footprint assumptions. For solar and geothermal technologies, this analysis assumes that the entire Plan Area would be affected. For wind and transmission development, this analysis assumes that only development footprints would be converted to nonagricultural use.

**IV.12.2.1.1 Impacts of Site Characterization**

Site characterization activities for solar, wind, and transmission facilities would have minimal if any impact on agricultural production. The impact of geothermal site characterization would include both conversion of agricultural land for well pads, wells, and roads and impacts on adjacent agricultural operations.
IV.12.1.2 Impacts of Construction and Decommissioning

Construction of solar and geothermal facilities would likely eliminate agricultural use within fenced project areas. Wind and transmission development, on the other hand, would eliminate agricultural use only within the footprints of turbines, poles, and associated infrastructure. Conversion of agricultural land to renewable energy development would be long term but not necessarily permanent. However, since generation projects are typically operational for 30 years or more, agricultural use may or may not resume after they are decommissioned.

The impacts of construction on adjacent agriculture operations would be the same for solar, wind, geothermal and transmission. These impacts would include (1) damage to equipment, crops, and livestock from increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) suppression of plant growth by fugitive dust; (5) soil erosion; and (6) the spread of weeds.

IV.12.1.3 Impacts of Operations and Maintenance

The operation and maintenance of solar, wind, geothermal and transmission facilities would have some ongoing impacts on adjacent agricultural lands. These impacts include (1) damage to equipment, crops, and livestock from increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) soil erosion; (5) spread of weeds; and (6) shading of crops.

IV.12.2 Impacts of the Reserve Design

Conservation lands within the reserve design and their associated CMAs limit disturbance and protect a variety of resources. However, restrictions tied to both the reserve design and to biological resources CMAs would likely prevent ongoing agricultural use in most Reserve Design Lands. As a result, Important Farmland within Reserve Design Lands would be converted to nonagricultural use. The reserve design and associated CMAs would likely be compatible with enrollment in the Williamson Act, which allows for open space preservation in addition to active agricultural use. Reserve design and CMAs would not adversely affect adjacent agricultural operations.

Note that Conservation Planning Areas identified on private lands are not mandatory and would only be implemented if there are willing sellers.
IV.12.2.3 Impacts of BLM Land Use Plan Decisions

IV.12.2.3.1 Impacts of Renewable Energy Development and Transmission on BLM Lands

There is no designated Important Farmland on BLM lands. See Section 12.1.1 (General Methods) for more details.

IV.12.2.3.2 Impacts of BLM Land Designations and Management Actions

Because BLM LUPA land designations would be managed to protect ecological, historic, cultural, scenic scientific, and recreation resources and values, the use of or access to agricultural resources would likely be restricted. However, there is no designated Important Farmland on BLM lands.

Details on allowable uses and management within National Landscape Conservation System (NLCS) lands appear in the LUPA description in Volume II. Details on the goals, objectives, allowable uses, and management actions for each Area of Critical Environmental Concern (ACEC) and Special Recreation Management Area (SRMA) appear in the LUPA worksheets in Appendix H.

IV.12.2.4 Impacts of Natural Community Conservation Plan and General Conservation Plan

The Natural Community Conservation Plan (NCCP) would be administered by the California Department of Fish and Wildlife (CDFW), and would apply to the entire Plan Area. The GCP would be administered by the USFWS and would apply to nonfederal lands, a subset of the entire Plan Area.

IV.12.2.4.1 Natural Community Conservation Plan

The impacts of renewable energy development permitted under the NCCP would be the same as those defined for the Plan-wide impacts, including the typical impacts described in Section IV.12.2.

IV.12.2.4.2 General Conservation Plan

The types of impacts resulting from renewable energy development permitted under the General Conservation Plan (GCP) would be the same as those defined for Plan-wide impacts, including the typical impacts described in Section IV.12.2.2. However, the locations where these impacts would occur would vary by alternative. Any differences in these impacts from locational differences are described for each alternative.
IV.12.3 Impact Analysis by Alternative

The following sections present impact analysis for the No Action Alternative, the Preferred Alternative, and Alternatives 1 through 4. Tables IV.12-1 through IV.12-3 summarize impacts on Important Farmland.

### Table IV.12-1

<table>
<thead>
<tr>
<th>Component</th>
<th>No Action</th>
<th>Preferred Alternative</th>
<th>Alternative 1</th>
<th>Alternative 2</th>
<th>Alternative 3</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Renewable energy and transmission impact acres</td>
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<td>56,000</td>
<td>71,000</td>
<td>48,000</td>
<td>57,000</td>
<td>53,000</td>
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<td>4,000</td>
<td>3,000</td>
<td>4,000</td>
<td>4,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>59,000</strong></td>
<td><strong>75,000</strong></td>
<td><strong>50,000</strong></td>
<td><strong>61,000</strong></td>
<td><strong>57,000</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Note:** The following general rounding rules were applied to calculated values: values greater than 1,000 were rounded to nearest 1,000; values less than 1,000 and greater than 100 were rounded to the nearest 100; values of 100 or less were rounded to the nearest 10, and therefore totals may not sum due to rounding. In cases where subtotals are provided, the subtotals and the totals are individually rounded. The totals are not a sum of the rounded subtotals; therefore the subtotals may not sum to the total within the table.

### Table IV.12-2

<table>
<thead>
<tr>
<th>Component</th>
<th>No Action</th>
<th>Preferred Alternative</th>
<th>Alternative 1</th>
<th>Alternative 2</th>
<th>Alternative 3</th>
<th>Alternative 4</th>
</tr>
</thead>
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<td>Solar</td>
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<td>3,000</td>
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<td>2,000</td>
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<td><strong>4,000</strong></td>
<td><strong>2,000</strong></td>
<td><strong>3,000</strong></td>
<td><strong>3,000</strong></td>
</tr>
</tbody>
</table>

**Note:** The following general rounding rules were applied to calculated values: values greater than 1,000 were rounded to nearest 1,000; values less than 1,000 and greater than 100 were rounded to the nearest 100; values of 100 or less were rounded to the nearest 10, and therefore totals may not sum due to rounding. In cases where subtotals are provided, the subtotals and the totals are individually rounded. The totals are not a sum of the rounded subtotals; therefore the subtotals may not sum to the total within the table.
## Table IV.12-3

**Acres of Important Farmland Converted to Nonagricultural Use by County and Alternative**

<table>
<thead>
<tr>
<th>Component</th>
<th>No Action</th>
<th>Preferred Alternative</th>
<th>Alternative 1</th>
<th>Alternative 2</th>
<th>Alternative 3</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>For Renewable Energy and Transmission</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Imperial County</td>
<td>15,000</td>
<td>43,000</td>
<td>50,000</td>
<td>37,000</td>
<td>41,000</td>
<td>34,000</td>
</tr>
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<td>Kern County</td>
<td>200</td>
<td>600</td>
<td>300</td>
<td>400</td>
<td>800</td>
<td>700</td>
</tr>
<tr>
<td>Los Angeles County</td>
<td>700</td>
<td>1,000</td>
<td>2,000</td>
<td>1,000</td>
<td>2,000</td>
<td>2,000</td>
</tr>
<tr>
<td>Riverside County</td>
<td>9,000</td>
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<td>400</td>
<td>800</td>
<td>300</td>
<td>700</td>
<td>500</td>
</tr>
<tr>
<td>San Diego County</td>
<td>100</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>25,000</strong></td>
<td><strong>56,000</strong></td>
<td><strong>71,000</strong></td>
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<td>80</td>
<td>100</td>
<td>80</td>
<td>90</td>
<td>100</td>
</tr>
<tr>
<td>Kern County</td>
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<td>100</td>
<td>500</td>
<td>1</td>
<td>200</td>
<td>100</td>
</tr>
<tr>
<td>Los Angeles County</td>
<td>—</td>
<td>1,000</td>
<td>2,000</td>
<td>800</td>
<td>2,000</td>
<td>1,000</td>
</tr>
<tr>
<td>Riverside County</td>
<td>—</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>2,000</td>
</tr>
<tr>
<td>San Bernardino County</td>
<td>—</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>200</td>
</tr>
<tr>
<td>San Diego County</td>
<td>—</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>—</td>
<td><strong>3,000</strong></td>
<td><strong>4,000</strong></td>
<td><strong>3,000</strong></td>
<td><strong>4,000</strong></td>
<td><strong>4,000</strong></td>
</tr>
<tr>
<td></td>
<td>Renewable Energy and Transmission Plus Conservation Planning Areas</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Imperial County</td>
<td>15,000</td>
<td>43,000</td>
<td>50,000</td>
<td>38,000</td>
<td>41,000</td>
<td>34,000</td>
</tr>
<tr>
<td>Kern County</td>
<td>200</td>
<td>700</td>
<td>800</td>
<td>400</td>
<td>1,000</td>
<td>800</td>
</tr>
<tr>
<td>Los Angeles County</td>
<td>700</td>
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<td>3,000</td>
<td>2,000</td>
<td>3,000</td>
<td>3,000</td>
</tr>
<tr>
<td>Riverside County</td>
<td>9,000</td>
<td>13,000</td>
<td>20,000</td>
<td>10,000</td>
<td>15,000</td>
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<td>1,000</td>
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<td>San Diego County</td>
<td>100</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>25,000</strong></td>
<td><strong>59,000</strong></td>
<td><strong>75,000</strong></td>
<td><strong>50,000</strong></td>
<td><strong>61,000</strong></td>
<td><strong>53,490</strong></td>
</tr>
</tbody>
</table>

**Note:** The following general rounding rules were applied to calculated values: values greater than 1,000 were rounded to nearest 1,000; values less than 1,000 and greater than 100 were rounded to the nearest 100; values of 100 or less were rounded to the nearest 10, and therefore totals may not sum due to rounding. In cases where subtotals are provided, the subtotals and the totals are individually rounded. The totals are not a sum of the rounded subtotals; therefore the subtotals may not sum to the total within the table.

### IV.12.3.1 No Action Alternative

The No Action Alternative assumes that the state's renewable energy goals would be achieved without the DRECP and that renewable energy, transmission development, and mitigation
for projects in the Plan Area would be developed on a project-by-project basis in a pattern consistent with past and ongoing renewable energy and transmission projects. Any areas currently excluded from development by statute, regulation, or proclamation would retain those exclusions. Any areas that are administratively excluded would continue to be assessed based on management guidance within BLM local field office land use plans.

**IV.12.3.1.1 Impacts Within the Entire Plan Area in No Action Alternative**

**IV.12.3.1.1.1 Impacts and Mitigation for Renewable Energy and Transmission Development in No Action Alternative.**

Potential impacts to agricultural resources from renewable energy and transmission facility development under the No Action Alternative, by ecoregion subarea, are shown in Table R2.12-1 (Appendix R2).

**Impacts**

Under the No Action Alternative, development of renewable energy would still be authorized on a project-by-project basis. The impacts defined for the No Action Alternative are the types identified by the lead agencies for approved solar, wind, and geothermal projects, and transmission projects.

**Impact AG-1: Alternative would convert Important Farmland to non-agricultural use or conflict with Williamson Act contracts.**

Development of renewable energy projects under the No Action Alternative would convert 25,000 acres of Important Farmland to non-agricultural use and conflict with 2,000 acres of Williamson Act lands. By technology type, the Important Farmland that may be affected under the No Impact alternative would be used for solar (13,000 acres), wind (1,000 acres), geothermal (600 acres), and transmission (10,000 acres).

Future renewable energy development could be located in all ecoregion subareas except Piute Valley and Sacramento Mountains and Panamint Death Valley under the No Action Alternative. The majority of renewable energy development would likely be built in the Imperial Borrego Valley, West Mojave and Eastern Slopes, and Cadiz Valley and Chocolate Mountains ecoregion subareas. The Mojave and Silurian Valley ecoregion subarea would have only 70 acres of transmission impacts. Pinto Lucerne Valley and Eastern Slopes ecoregion subarea would have only 6 acres of impacts to Important Farmland. Within the remaining ecoregion subareas there would be minimal or no overlap of Important Farmland with renewable energy development under the No Action Alternative.
Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.

Under the No Action Alternative, renewable energy development would adversely affect adjacent agricultural operations. Potential impacts include (1) damage to equipment, crops, and livestock from increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) suppression plant growth by fugitive dust; (5) soil erosion; (6) spread of weeds; and (7) shading of crops.

Laws and Regulations

Existing laws and regulations would reduce the impacts of renewable energy development projects in the absence of the DRECP. Relevant regulations are presented in the Regulatory Setting in Volume III. Note that because this Environmental Impact Report/Environmental Impact Statement (EIR/EIS) addresses amendments to BLM’s land use plans, these plans are addressed separately and are not included in this section. The requirements of relevant regulations would reduce impacts through the following mechanisms:

- County General Plan elements and zoning ordinances include agricultural designations that protect agricultural land and agricultural production from development. In some counties, some types and scales of renewable energy development are compatible with agricultural zoning.
- Laws related to air quality (described in Chapter III.2, Air Quality) would reduce impacts from fugitive dust.
- Laws related to water quality (described in Chapter III.6, Groundwater, Water Supply and Water Quality) would reduce impacts from sedimentation and accidental spills.
- Laws governing hazardous materials (described in Chapter III.22, Public Safety and Services) would reduce impacts related to potential spills and contamination.
- The Solar Programmatic EIS includes numerous Design Features (Appendix W) that would reduce the impacts of solar energy development on adjacent agricultural operations from development in BLM Solar Energy Zones (SEZs) and Solar PEIS variance lands. These Design Features address soil resources and erosion (SR1-1, SR2-1, SR3-1, SR3-2, SR4-1, SR4-2, SR4-3, ER2-1); water quality (WR1-1, WR2-1, WR3-1, WR4-1, ER1-1); air quality (AQC1-1, AQC2-1, AQC3-1, AQC4-1); weed management (ER3-1); hazardous materials (HMW1-1, HMW2-1, HMW3-1, HMW4-1, HMW4-2, HS1-1, HS2-1, HS3-1); restoration after decommissioning (ER4-1); and land use conflicts (LR1-1).
Mitigation

Future projects approved under the No Action Alternative would likely include the same types of mitigation for agricultural resources for previously approved projects. In the case of agricultural resources, mitigation used by local, state, and federal lead agencies varies widely, and would likely continue to vary widely. Mitigation measures under the No Action Alternative may include the following (the lead agency requiring the mitigation is included in parentheses):

**Avoidance and Minimization:**

- Minimize paving and ground-disturbing activities to the maximum extent practical within agricultural fields to retain agricultural soil characteristics (Imperial County).
- Develop and implement a Decommissioning Plan that ensures facilities would be dismantled and the site restored (Imperial County, Kern County, Los Angeles County).
- Reimburse the applicable county’s Agricultural Commissioner’s office for monitoring and investigating complaints involving projects and their potential impacts on nearby agricultural operations (Imperial County).

**Compensatory Mitigation:**

- Purchase agricultural conservation easements for impacts to Important Farmland (Imperial County, Kern County, Los Angeles County).³
- Pay in-lieu fees or purchase credits from an established agricultural mitigation bank (Imperial County, Kern County, Los Angeles County).

**IV.12.3.1.1.2 Impacts from Reserve Design in the No Action Alternative**

The No Action Alternative has no reserve design, but without approval of an action alternative, there would be continued protection of existing Legislatively and Legally Protected Areas (LLPAs) like wilderness areas. In addition, under the No Action Alternative, renewable energy projects would continue to be evaluated and approved with project-specific mitigation requirements, including off-site habitat acquisition for affected special-status species.

**IV.12.3.1.2 Impacts on BLM Lands of Existing BLM Land Use Plans in No Action Alternative**

There are no Important Farmlands on BLM lands. See Section 12.1.1 (General Methods) for more details.

³ Imperial County has also required 2:1 compensatory mitigation for impacts to Prime Farmland
**IV.12.3.1.3 Impacts of Natural Community Conservation Plan in No Action Alternative**

The NCCP would apply to all lands within the Plan Area. In the absence of Plan implementation, the NCCP would not be approved and no incidental take permits would be issued under the NCCP. Projects would continue to be considered by the appropriate lead agency on an individual basis. The impacts that would still occur in the absence of the NCCP would be the same as those described in Section IV.23.3.1.1.1 (Plan-wide Analysis).

**IV.12.3.1.4 Impacts of General Conservation Plan in No Action Alternative**

As described in Appendix M, the GCP would apply to nonfederal lands in the Plan Area. In the absence of Plan implementation, the GCP would not be approved and no incidental take permits would be issued under the GCP. Projects would still be considered by the appropriate lead agency on an individual basis. The impacts that would occur in the absence of the GCP would be the same as those described in Section IV.12.3.1.1.1 (Plan-wide Analysis), but would be specific to nonfederal lands.

**IV.12.3.1.5 Impacts Outside the Plan Area in No Action Alternative**

**IV.12.3.1.5.1 Impacts of Transmission Outside the Plan Area**

Additional transmission lines would be needed to deliver renewable energy to load centers (areas of high demand) outside the Plan Area. It is assumed that new transmission lines outside the Plan Area would use existing transmission corridors between the Plan Area and existing substations in the more heavily populated areas of the state. The Out of Plan areas through which new transmission lines might be constructed are San Diego, Los Angeles, North Palm Springs–Riverside, and the Central Valley. With regard to agricultural lands, these areas are described in Chapter III.12 (Agricultural Land and Production), Section III.12.5.

For agricultural resources, two primary concerns are whether affected land is under contract in the Williamson Act program, or whether the agricultural land has been identified as important under California DOC’s FMMP. Williamson Act land within a 3-mile swath (1.5 miles on either side of the line) along each transmission corridor ranges from 0 acres in the Los Angeles area to over 300,000 acres in the Central Valley area. As with Williamson Act lands, the amount and categories of mapped farmland and their distribution vary widely by area.
Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.

Typically, transmission towers have a relatively small footprint within an agricultural field or orchard, resulting in a relatively small loss of agricultural land. As a compatible use, transmission lines do not require cancellation of Williamson Act contracts, and agricultural practices can continue on ROW lands not occupied by towers or access roads. In cases where new lines are in or adjacent to an existing transmission ROW, new access roads are not required. In many cases, access is infrequent after construction.

Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.

Once installed, transmission towers are unlikely to have adverse effects on adjacent agricultural lands. One potential exception would be crop dusting in heavily agricultural areas such as the Central Valley, where towers and conductor spans could pose a risk to aircraft. However, crop dusters are able to avoid poles, towers, and wires and would plan their crop-dusting patterns to account for the new linear transmission lines. In addition, the lines outside the Plan Area would be near or adjacent to existing lines, which are already part of crop dusters’ established work environments.

IV.12.3.1.5.2 Impacts of Existing BLM Land Use Plans Outside the Plan Area

Under the No Action Alternative, the existing BLM California Desert Conservation Area (CDCA) land use plan would still be implemented on CDCA lands, and renewable energy projects would still be developed through BLM’s existing policies. Existing land designations such as existing protected areas, ACECs, and National Scenic and Historic Trails, would continue to be managed to protect their associated values and resources. BLM lands do not include Important Farmland; therefore, Important Farmland would not be affected.

IV.12.3.1.6 CEQA Significance Determination: No Action Alternative

Agricultural impacts and their associated significance determinations for the No Action Alternative follow:

AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts. Construction of renewable energy projects and transmission lines would convert Important Farmland to nonagricultural use. Future renewable energy development would likely be located in all ecoregion subareas except Piute Valley and Sacramento Mountains and Panamint Death Valley under the No Action Alternative. Available development areas under the No Action Alternative include 25,000
acres of Important Farmland that potentially would be converted to nonagricultural use. Available development areas would also affect 2,000 acres of Williamson Act lands. Most lead agencies would require some compensatory mitigation (e.g., agricultural conservation easements or in-lieu-of fees) for conversion of Important Farmland. Lead agencies would also likely require site restoration after projects are decommissioned, at which point agricultural activities may resume on some affected Important Farmland. However, since projects are likely to be operational for 30 years or more, agricultural use may not resume after decommissioning. Therefore, the potential conversion of Important Farmland to nonagricultural use would be a significant and unavoidable impact.

**AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.** The construction and operation of renewable energy facilities may cause a variety of impacts on adjacent agricultural lands. Potential impacts include (1) damage to equipment, crops, and livestock from increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) suppression plant growth by fugitive dust; (5) soil erosion; (6) spread of weeds; and (7) shading of crops. These potential impacts would be minimized by Solar PEIS Design Features and existing regulations governing water quality, hazardous materials, and air pollution. In addition, lead agencies would likely require renewable energy projects to implement a variety of project-specific mitigation measures that would protect adjacent agricultural land through controlling traffic, water use, hazardous material spills, water use, erosion, fugitive dust, and the spread of weeds. In the absence of the DRECP, these mitigation measures would not necessarily be consistent among projects. However, because existing regulations and Solar PEIS Design Features would minimize most effects on adjacent agricultural operations, impacts would be adverse, but less than significant.

**IV.12.3.2 Preferred Alternative**

The effects of the Preferred Alternative on baseline conditions, including transmission development and BLM LUPA decisions outside the Plan Area, are described in the following sections.

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4 Note that county “Right-to-Farm” Acts, which have been adopted by counties in the Plan Area, protect farmers from complaints (from neighbors and the general public) about nuisances related to farm practices (such as odors and noise). These laws do not generally protect agricultural land from the effects of adjacent land uses.
**IV.12.3.2.1 Plan-wide Impacts of Implementing the DRECP: Preferred Alternative**

Potential impacts to agricultural resources resulting from renewable energy and transmission facility development under the Preferred Alternative, by ecoregion subarea, are shown in Table R2.12-3 (Appendix R2).

**IV.12.3.2.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development**

**Impact Assessment**

Under the Preferred Alternative, renewable energy-related activities covered in the Plan Area are confined to DFAs.

***Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.***

Plan-wide, development under the Preferred Alternative would convert 56,000 acres of Important Farmland to renewable energy use. This represents 8% of the total Important Farmland within the Plan Area. The Important Farmland that would be affected would be for solar (37,000 acres), wind (1,000 acres), geothermal (9,000 acres), and transmission (9,000 acres). The Preferred Alternative would also affect 2,000 acres of Williamson Act lands within the DFAs. These Williamson Act lands would be used for wind (100 acres), solar (2,000 acres), and transmission (400 acres).

Under the Preferred Alternative, renewable energy development would affect Important Farmland in the following ecoregion subareas: Cadiz and Chocolate Mountains (11,000 acres), Imperial Borrego Valley (43,000 acres), and West Mojave and Eastern Slope (2,000 acres). Impacts by county appear in Table IV.12-3.

***Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.***

Renewable energy and transmission development under the Preferred Alternative would adversely affect adjacent agricultural operations. Potential impacts would be the same as for the No Action Alternative. These impacts would be particularly acute in ecoregion subareas where large amounts of Important Farmland would be affected (specifically Cadiz Valley and Chocolate Mountains and Imperial Borrego Valley).
Impacts in Study Area Lands

There is no Important Farmland in Study Area Lands (see Table R2.12-4). Therefore, Study Area Lands (including Future Assessment Areas [FAAs], Special Analysis Areas [SAAs], and DRECP Variance Lands) are not addressed in this section.

Impact Reduction Strategies and Mitigation

Implementation of the Plan would result in both the conservation of some desert lands as well as the development of renewable energy generation and transmission facilities. There are several ways that the impacts of renewable energy development would be lessened. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. The implementation of existing laws, orders, regulations and standards would additionally reduce the impacts of project development. If significant impacts still result after implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

Conservation and Management Actions

The conservation strategy for the Preferred Alternative (presented in Volume II, Section II.3.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy defines the reserve design and specific CMAs for the Preferred Alternative. While the CMAs were developed for BLM lands only, this analysis assumes that all CMAs would also apply to nonfederal lands.

The following CMAs are relevant to agricultural resources:

- BLM-Specific Air Resources CMAs.
- BLM-Specific Soil, Water, and Water-Dependent Resources CMAs.
- AM-PW-9 (Water Quality).
- AM-PW-10 (Soil Resources).
- AM-PW-11 (Weed Management).
- AM-PW-12 (Fire Management).
- AM-PW-13 (Noise).
- AM-LL-2 (Hydrology).
- AM-TRANS-1 (Transmission Impacts).
Agricultural Lands Conservation Strategy

There are five Covered Species (desert pupfish, burrowing owl, mountain plover, greater sandhill crane, and Swainson’s hawk) associated with agricultural land. In addition to CMAs for these Covered Species, the avoidance and setback provisions for managed wetlands, the Mojave River, and agricultural drains (see RIPWET in Section II.3.1.5.3) would conserve wetland and riparian features within the agricultural matrix and provide conservation benefits to these Covered Species. Impacts to agricultural lands will comply with required compensation for the loss of agricultural habitat, with focus on the Imperial Valley, Palo Verde Valley, and West Mojave. Furthermore, Covered Activities will adhere to applicable conditions of the Agricultural Species Adaptive Management Plan (Section II.3.1.2), which provides adaptive conservation and management for Covered Species in agricultural lands. The loss of agricultural lands would be compensated through conserving or otherwise protecting habitat for agricultural land Covered Species (e.g., agricultural habitat or native habitat) from development. The DRECP coordination group(s) would determine acceptable locations and conservation or protection approaches suitable for compensating for the loss of agricultural habitat.

Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in Volume III, the Regulatory Setting. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.12.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will be applied to further reduce some of the DRECP’s adverse impacts. As described in the discussion of the Agricultural Lands Conservation Strategy above, some mitigation for impacts to agricultural land would occur through biological resources mitigation for Covered Species that use agricultural land habitat. In mitigating for impacts to agriculture-dependent Covered Species, permittees have a range of options, including paying mitigation fees.

Mitigation Measures for Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.

AG-1a Minimize Impacts to Agricultural Resources. If a project is sited on or adjacent to Important Farmland, the Permittee shall:
a) Minimize paving and ground-disturbing activities to the maximum extent practical within agricultural fields to retain agricultural soil characteristics.

b) Coordinate with the applicable county and other stakeholders early in the planning process to consider options to avoid, minimize, and/or mitigate impacts to Important Farmland and adjacent agricultural operations.

c) Notify adjacent agricultural operations of construction schedules and provide a point of contact for complaints about impacts to adjacent agricultural resources. The Permittee shall also reimburse the applicable county Agricultural Commissioner’s Office for any necessary investigations into any complaints received.

AG-1b Develop an Agricultural Resources Protection Plan. The Permittee shall develop an Agricultural Resources Protection Plan (ARPP) in consultation with the appropriate county’s Agricultural Advisory Committee, to be reviewed by a professional agronomist approved by the county. The ARPP will include an assessment of agricultural resources on the site at the time a project is proposed and will provide detailed strategies and performance standards for restoring temporarily disturbed areas and for vegetation and soil management during project construction, operations, and decommissioning in order to minimize any potential long-term damage to agricultural soils. The Agricultural Resources Protection Plan (ARPP) will address the following as applicable and as required by the affected county:

a) Maintaining Soil Nutrients. The ARPP shall describe strategies for maintaining soil nutrients during project operations through vegetation management strategies developed in consultation with local fire departments.

b) Weed Management. The ARPP shall include allowable weed management strategies and a list of prohibited herbicides and pesticides. General properties of prohibited herbicides and pesticides shall also be included.

c) Topsoil Salvage. The ARPP shall outline areas within the construction footprint where topsoil is present and can be salvaged and stockpiled for replacement during subsequent construction activities and post-construction site restoration.

d) Performance Standards and Testing. The ARPP will include performance standards for on-site soils 1 year after project construction and then every 5 years thereafter until the end of project decommissioning.
Soil assessments shall be conducted by a professional agricultural soil scientist, and the ARPP shall include detailed requirements for soil testing.

e) **Reporting.** One year after project construction and every 5 years thereafter until project decommissioning, reports shall be submitted to the applicable county detailing soil quality and vegetation management activities and results of required soil assessments.

f) **Decommissioning.** The ARPP shall also outline requirements for mulch and/or cover crops to be used after decommissioning. The plan shall outline performance standards for site soils after removal of structures and facilities. These performance standards shall include physical and chemical properties of the soil, which shall be tested by a soil scientist approved by the county and submitted to the county for approval before any funds (described in Mitigation Measure AG-1[b]) may be released by the county.

**AG-1c Compensate for loss of Important Farmland.** If Important Farmland is converted to nonagricultural use and no off-site habitat acquisition for agriculture-dependent Covered Species is required, the Permittee shall mitigate for the loss of farmland through permanent preservation of off-site farmlands. If approved by the applicable county, mitigation for agriculture-dependent Covered species may be sufficient to compensate for loss of Important Farmland. Prior to the start of ground disturbance, the Permittee shall provide evidence to the DRECP coordination group(s) and the appropriate county that an agricultural conservation easement acceptable to the county has been granted in perpetuity to the county or a qualified agricultural land trust, approved by the county.

A qualified agricultural land trust must demonstrate that it (1) has adopted the Land Trust Alliance’s Standards and Practices, (2) has substantial experience creating and stewarding agricultural conservation easements, and (3) has a stewardship endowment to help pay for its perpetual stewardship obligations.

Prior to commencement of construction or ground-disturbing activities, the Permittee shall also provide appropriate funds (as determined by the DRECP coordination group[s]) to compensate for reasonable administrative costs incurred by the easement holder, including an endowment to cover the cost of monitoring and enforcing the easement in perpetuity.

**AG-1d Ensure Compatibility with or Terminate Williamson Act Contracts.** If a project site is enrolled in a Williamson Act contract, the Permittee shall
ensure that the project is compatible with state and county Williamson Act provisions. If the project is not compatible, the contracted parcels shall complete the nonrenewal process or obtain a contract cancellation approved by the appropriate county board of supervisors (in consultation with the state DOC) before project construction begins.

**Mitigation Measures for Impact AG-2:** Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations. Mitigation Measure AG-1a would apply to Impact AG-2 as well.

### IV.12.3.2.1.2 Impacts of the Reserve Design

The Plan-wide impacts of the Preferred Alternative reserve design on Important Farmland and Williamson Act lands are shown in Appendix R2 and summarized here. The reserve design is described in Volume II for each alternative. Under the Preferred Alternative, 6,069 acres of Important Farmland are included in Conservation Planning Areas.\(^5\)

**Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.**

There are 3,000 acres of Important Farmland in Conservation Planning Areas under the Preferred Alternative. As discussed in Section IV.12.2.2, conservation lands within the reserve design and their associated CMAs limit disturbance and protect a variety of resources. However, restrictions tied to the reserve design and biological resources CMAs would likely prevent the ongoing agricultural use of most Reserve Design Lands. Although conservation actions would not damage agricultural soils, Important Farmland would be converted to nonagricultural use. The reserve design and associated CMAs would likely be compatible with enrollment in the Williamson Act, which allows for open-space preservation in addition to active agricultural use.

**Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.**

Reserve design lands would not involve activities or facilities that would adversely impact adjacent agriculture.

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\(^5\) Note that Conservation Planning Areas identified on private lands are not mandatory and would only be implemented if there are willing sellers.
**IV.12.3.2.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Preferred Alternative**

This section addresses two components of the effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under LUPA, and the impacts of the amended land use plans themselves.

**IV.12.3.2.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land**

There is no designated Important Farmland on BLM lands. See Section 12.1.1 for more detail.

**IV.12.3.2.2.2 Impacts of Changes to BLM Land Designations**

There is no designated Important Farmland on BLM lands. See Section 12.1.1 for more detail.

**IV.12.3.2.3 Impacts of Natural Community Conservation Plan: Preferred Alternative**

The analysis of Covered Activities under the NCCP is equivalent to the Plan-wide analysis of the interagency alternatives. Reserve design features and other CMAs under the NCCP alternatives represent more detailed categories of the reserve design under interagency Plan-wide alternatives. These NCCP differences in reserve design features do not affect nonbiological resources analyzed in this document, and the analysis of reserve design and CMAs under the NCCP is therefore equivalent to the Plan-wide analysis of the interagency alternatives, as described in Section IV.12.3.2.1 for the Plan-wide analysis.

**IV.12.3.2.4 Impacts of General Conservation Plan**

The impacts of the GCP for the Preferred Alternative would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis, but they would occur on nonfederal lands only.

**IV.12.3.2.5 Impacts Outside the Plan Area**

**IV.12.3.2.5.1 Impacts of Transmission Outside the Plan Area**

The impacts of Out of Plan Area transmission on agricultural land and production would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.12.3.1.5.1 (Impacts of Transmission Outside of Plan Area in No Action Alternative).
IV.12.3.2.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

There is no designated Important Farmland on BLM lands. See Section 12.1.1 for more detail.

IV.12.3.2.6 CEQA Significance Determination for the Preferred Alternative

The agricultural impacts and significance determinations for the Preferred Alternative follow:

AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts. Under the Preferred Alternative, renewable energy and transmission development and the reserve design would convert 59,000 acres of Important Farmland to nonagricultural use. The Preferred Alternative would also affect 2,000 acres of Williamson Act lands within the DFAs. Mitigation Measures AG-1a (Minimize Impacts to Agricultural Resources), AG-1b (Develop an Agricultural Resources Protection Plan), AG-1c (Compensate for Loss of Important Farmland), and AG-1d (Ensure Compatibility With or Terminate Williamson Act Contracts), would reduce impacts in part through ensuring restoration of agricultural sites after project decommissioning, and partly through requiring preservation of some off-site agricultural land. However, the potential conversion of Important Farmland to nonagricultural use would still be a significant and unavoidable impact.

AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations. Renewable energy and transmission development may impact adjacent agricultural land through damage to equipment, crops, and livestock from (1) increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) suppression plant growth by fugitive dust; (5) soil erosion; (6) spread of weeds; and (7) shading of crops. CMAs would minimize most of these impacts. In addition, Mitigation Measure AG-1a would require coordination with agricultural operations regarding construction schedules. With the implementation of this measure, impacts would be less than significant.

IV.12.3.2.7 Comparison of the Preferred Alternative With No Action Alternative

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative across all disciplines. This section summarizes the comparison of the Preferred Alternative with the No Action Alternative.

IV.12.3.2.7.1 Preferred Alternative Compared With No Action Alternative for Plan-wide DRECP

There would be impacts to agricultural resources under both the Preferred and No Action Alternatives. However, impacts would differ geographically and the Preferred Alternative would affect substantially more Important Farmland than the No Action Alternative (59,000
Acres versus 25,000 acres). The No Action Alternative’s available areas for development are widely distributed across the Plan Area, whereas the DFAs in the Preferred Alternative are clustered in the Imperial Borrego Valley and Cadiz Valley and Chocolate Mountains ecoregion subareas. In addition, under the Preferred Alternative agricultural use would be restricted or eliminated in most areas within the reserve design. Under the No Action Alternative, mitigation for impacts to agricultural resources would continue to vary by project and there would be no Plan-wide CMAs.

IV.12.3.2.7.2 Preferred Alternative Compared With No Action Alternative for the BLM LUPA

There is no designated Important Farmland on BLM lands. See Section 12.1.1 for more detail.

IV.12.3.2.7.3 Preferred Alternative Compared With No Action Alternative for NCCP

The agricultural impacts of the NCCP for the Preferred Alternative are the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis. As a result, the comparison of the Preferred Alternative with the No Action Alternative for the NCCP is the same as described for the Plan-wide DRECP.

IV.12.3.2.7.4 Preferred Alternative Compared With No Action Alternative for the GCP

The agricultural impacts of the GCP for the Preferred Alternative would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis, but would occur on nonfederal lands only. In the absence of Plan implementation, the GCP would not be approved and the agricultural impacts of projects would continue to be evaluated individually by the appropriate lead agency.

IV.12.3.3 Alternative 1

IV.12.3.3.1 Plan-wide Impacts of Implementing the DRECP: Alternative 1

Potential impacts to agricultural resources from renewable energy and transmission development under the Alternative 1 are shown in Table R2.12-8 (Appendix R2).

IV.12.3.3.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development

Impact Assessment

Under Alternative 1, renewable energy-related activities covered by the Plan are confined to DFAs. Alternative 1 has the smallest overall acreage within DFAs. The DFAs are largely confined to disturbed lands in the West Mojave, Imperial Borrego Valley, and Pinto Lucerne Valley and Eastern Slopes ecoregion subareas. The majority of DFAs are located
on private land with the exception of geothermal, which is mostly located on BLM and nonfederal lands.

**AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.**

Under Alternative 1, renewable energy and transmission would convert 71,000 acres of Important Farmland to nonagricultural use. This represents 10% of the total Important Farmland within the Plan Area. The Important Farmland that would be converted would be for solar (52,000 acres), wind (200 acres), geothermal (9,000 acres), and transmission (10,000 acres). Alternative 1 would also affect 4,000 acres of Williamson Act contract lands. These Williamson Act lands would be used for wind (50 acres), solar (3,000 acres), and transmission (200 acres).

Under Alternative 1, renewable energy and transmission development would affect Important Farmland in the following ecoregion subareas: Cadiz and Chocolate Mountains (18,000 acres), Imperial Borrego Valley (50,000 acres), and West Mojave and Eastern Slope (2,000 acres). Impacts by county appear in Table IV.12-3.

**Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.**

These impacts would be the same as those described for the Preferred Alternative except that the geographic distribution of impacts would reflect the development locations described for Impact AG-1 for Alternative 1.

**Impacts in Study Area Lands**

There is no Important Farmland in Study Area Lands. Therefore, Study Area Lands (including FAAs, SAAs, and DRECP Variance Lands) are not addressed in this section.

**Impact Reduction Strategies and Mitigation**

Implementation of the Plan would result in both conservation of some desert lands as well as development of renewable energy generation and transmission facilities on other lands. The impacts of the renewable energy development covered by the Plan would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. Also, the implementation of existing laws, orders, regulations and standards would reduce the impacts of project development. If significant impacts would still result after implementation of CMAs and compliance
with applicable laws and regulations, then specific mitigation measures are recommended in this section.

**Conservation and Management Actions**

The conservation strategy for Alternative 1 (see Section II.3.1.1) defines specific actions that would reduce its impacts. The conservation strategy includes the definition of the reserve design and specific CMAs for the Preferred Alternative. While the CMAs were developed for BLM lands only, this analysis assumes that all CMAs would also apply to nonfederal lands.

**Laws and Regulations**

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in Volume III, the Regulatory Setting. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.12.3.1.1.1.

**Mitigation Measures**

After implementation of the CMAs and existing laws and regulations, mitigation measures will be applied to further reduce some of the Plan’s adverse impacts. The same mitigation measures would apply to Alternative 1 that apply to the Preferred Alternative.

**IV.12.3.3.1.2 Impacts from Reserve Design**

The Plan-wide impacts of the Alternative 1 reserve design on Important Farmland and Williamson Act land are shown in Appendix R2 and summarized here. The reserve design is described in Volume II for each alternative.

**Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.**

Under Alternative 1, there are 4,000 acres of Important Farmland within Conservation Planning Areas. As discussed in Section IV.12.2.2, conservation lands within the reserve design and their associated CMAs limit disturbance and protect a variety of resources. However, restrictions tied to the reserve design and biological resources CMAs would likely prevent ongoing agricultural use of most Reserve Design Lands. Although conservation actions would not damage agricultural soils, Important Farmland would be converted to nonagricultural use. The reserve design and associated CMAs would likely be compatible with enrollment in the Williamson Act, which allows for open space preservation in addition to active agricultural use.
**Impact AG-2**: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.

Reserve Design Lands would not involve activities or facilities that would adversely affect adjacent agricultural operations.

**IV.12.3.3.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 1**

**IV.12.3.3.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land**

There is no Important Farmland on BLM lands. See Section 12.1.1 for more detail.

**IV.12.3.3.2.2 Impacts of Changes to BLM Land Designations**

There is no Important Farmland on BLM lands. See Section 12.1.1 for more detail.

**IV.12.3.3.3 Impacts of Natural Community Conservation Plan: Alternative 1**

The impacts of the NCCP for Alternative 1 would be the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis.

**IV.12.3.3.4 Impacts of General Conservation Plan**

The impacts of the GCP for Alternative 1 would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis, but they would occur on nonfederal lands only.

**IV.12.3.3.5 Impacts Outside the Plan Area**

**IV.12.3.3.5.1 Impacts of Transmission Outside the Plan Area**

The impacts of transmission outside the Plan Area on agricultural land and production would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.12.3.1.5.1 (Impacts of Transmission Outside of Plan Area in No Action Alternative).

**IV.12.3.3.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area**

There is no Important Farmland on BLM lands. See Section 12.1.1 for more detail.
IV.12.3.3.6 CEQA Significance Determination for Alternative 1

The agricultural impacts and their associated significance determinations for Alternative 1 follow:

AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts. Under Alternative 1, renewable energy and transmission development and the reserve design would convert 75,000 acres of Important Farmland to nonagricultural use. Alternative 1 would also affect 4,000 acres of Williamson Act lands within the DFAs. Mitigation Measures AG-1a (Minimize Impacts to Agricultural Resources), AG-1b (Develop an Agricultural Resources Protection Plan), AG-1c (Compensate for Loss of Important Farmland), and AG-1d (Ensure Compatibility With or Terminate Williamson Act Contracts) would reduce impacts in part through both ensuring the restoration of agricultural sites after project decommissioning, and partly through requiring preservation of some off-site agricultural land. However, the potential conversion of Important Farmland to nonagricultural use would still be a significant and unavoidable impact.

AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations. Renewable energy and transmission development may impact agricultural use of adjacent agricultural land through (1) damage to equipment, crops, and livestock from increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) suppression plant growth by fugitive dust; (5) soil erosion; (6) spread of weeds; and (7) shading of crops. CMAs would minimize most of these impacts. In addition, Mitigation Measure AG-1a would require construction schedule coordination with agricultural operations. With the implementation of this measure, impacts would be less than significant.

IV.12.3.3.7 Comparison of Alternative 1 With the Preferred Alternative

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative, across all disciplines. This section summarizes the comparison of Alternative 1 with the Preferred Alternative.

IV.12.3.3.7.1 Alternative 1 Compared With Preferred Alternative for Plan-wide DRECP

There would be impacts to agricultural resources under both Alternative 1 and the Preferred Alternative. Alternative 1 would result in the conversion of more land to nonagricultural use (75,000 acres versus 59,000 acres) than under the Preferred Alternative. Under Alternative 1, more of this acreage (4,000 acres) would be affected by the reserve design than under the Preferred Alternative (2,000 acres). Alternative 1 would also affect more agricultural land than any other alternative.
**Geographic Distinctions.** Alternative 1 would affect 50,000 acres of agricultural land in Imperial County and 18,000 acres in Riverside County. The Preferred Alternative would affect 43,000 acres in Imperial County and 11,000 acres in Riverside County.

**IV.12.3.3.7.2 Preferred Alternative Compared With No Action Alternative for the BLM LUPA**

There is no Important Farmland on BLM lands. See Section 12.1.1 for more detail.

**IV.12.3.3.7.3 Preferred Alternative Compared With No Action Alternative for NCCP**

The agricultural impacts of the NCCP for Alternative 1 are the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis. As a result, the comparison of the Preferred Alternative with Alternative 1 for the NCCP is the same as described for the Plan-wide DRECP.

**IV.12.3.3.7.4 Preferred Alternative Compared With No Action Alternative for the GCP**

The agricultural impacts of the GCP for Alternative 1 would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis, but would occur on nonfederal lands only.

**IV.12.3.4 Alternative 2**

**IV.12.3.4.1 Plan-wide Impacts of Implementing the DRECP: Alternative 2**

Potential impacts to agricultural resources from renewable energy and transmission facility development under Alternative 2, by ecoregion subarea, appear in Table R2.12-12 (Appendix R2).

**IV.12.3.4.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development**

**Impact Assessment**

Alternative 2 has the largest overall acreage within DFAs. The DFAs are geographically dispersed (for solar and wind) and maximized on private and public lands with expanded wind opportunities. Geothermal development would be within both Imperial Borrego Valley and Owens River Valley.

*Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.*

Development of the DFAs under Alternative 2 would convert 48,000 acres of Important Farmland to renewable energy development. This represents 7% of the total Important
Farmland within the Plan Area. The acres of Important Farmland that would be affected would be for solar (28,000 acres), wind (1,000 acres), geothermal (9,000 acres), and transmission (10,000 acres). Alternative 2 would also affect 2,000 acres of Williamson Act lands within the DFAs. These Williamson Act lands would be for wind (100 acres), solar (1,000 acres), and transmission (300 acres).

Under the Preferred Alternative renewable energy development would affect Important Farmland in the following ecoregion subareas: Cadiz and Chocolate Mountains (9,000 acres), Imperial Borrego Valley (37,000 acres), and West Mojave and Eastern Slope (2,000 acres). Impacts by county are shown in Table IV.12-3.

**Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.**

These impacts would be the same as those described for the Preferred Alternative except that the geographic distribution of impacts would reflect the development locations described for Impact AG-1 for Alternative 2.

**Impacts in Study Area Lands**

There is no Important Farmland in Study Area Lands. Therefore, Study Area Lands (including FAAs, SAAs, and DRECP Variance Lands) are not addressed in this section.

**Impact Reduction Strategies and Mitigation**

The implementation of the Plan would result in both conservation of some desert lands as well as development of renewable energy generation and transmission facilities on other lands. The impacts of the renewable energy development covered by the Plan would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. Also, the implementation of existing laws, orders, regulations and standards would reduce the impacts of project development. If significant impacts would still result after both implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

**Conservation and Management Actions**

The conservation strategy for Alternative 2 (see Section II.3.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes definitions of the reserve design and specific CMAs for the Preferred Alternative.
Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations appear in Volume III, the Regulatory Setting. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.12.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will further reduce some of the DRECP’s adverse impacts.

IV.12.3.4.1.2 Impacts from Reserve Design

The Plan-wide impacts of the Alternative 2 reserve design on Important Farmland and Williamson Act land are shown in Appendix U and summarized here. The reserve design is described in Volume II for each alternative. Under Alternative 2, there are 3,000 acres of Important Farmland that overlap with Conservation Planning Areas.6

Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.

Under Alternative 2, a total of 3,000 acres of Important Farmland overlap with Conservation Planning Areas. As discussed in Section IV.12.2.2, conservation lands within the reserve design and their associated CMAs are intended to limit disturbance and protect a variety of resources. However, restrictions tied to the reserve design and biological resources CMAs would likely prevent ongoing agricultural use of most Reserve Design Lands. Although conservation actions would not damage agricultural soils, Important Farmland would be converted to nonagricultural use. Conservation Planning Areas also overlap with 1,000 acres of Williamson Act land. However, the reserve design and associated CMAs would likely be compatible with enrollment in the Williamson Act, which allows for open space preservation in addition to active agricultural use.

Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.

Reserve Design Lands would not involve activities or facilities that would adversely impact adjacent agriculture.

6 Note that Conservation Planning Areas identified on private lands are not mandatory and would only be implemented if there are willing sellers.
**IV.12.3.4.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 2**

This section addresses two components of effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under the LUPA, and the impacts of the amended land use plans themselves.

**IV.12.3.4.2.1 Impacts From Renewable Energy and Transmission Development on BLM Land**

There is no designated Important Farmland on BLM lands. See Section 12.1.1 for more details.

**IV.12.3.4.2.2 Impacts of Changes to BLM Land Designations**

There is no designated Important Farmland on BLM lands. See Section 12.1.1 for more details.

**IV.12.3.4.3 Impacts of Natural Community Conservation Plan: Alternative 2**

The impacts of the NCCP for Alternative 2 would be the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis.

**IV.12.3.4.4 Impacts of General Conservation Plan**

The impacts of the GCP for Alternative 2 would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis, but would occur on nonfederal lands only.

**IV.12.3.4.5 Impacts Outside the Plan Area**

**IV.12.3.4.5.1 Impacts of Transmission Outside the Plan Area**

The impacts of transmission outside the Plan Area on agricultural land and production would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.12.3.1.5.1 (Impacts of Transmission Outside of Plan Area in No Action Alternative).

**IV.12.3.4.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area**

Under the proposed BLM LUPA, the only changes outside the Plan Area would be designation of NLCS lands, ACECs, and National Scenic and Historic Trails Management Corridors, and Visual Resource Management Classes and new land allocations on CDCA lands. There is no designated Important Farmland on BLM land outside the Plan Area.
**IV.12.3.4.6 CEQA Significance Determination for Alternative 2**

The agricultural impacts and their associated significance determinations for Alternative 2 follow:

**AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.** Under Alternative 2, renewable energy and transmission development and the reserve design would convert 50,000 acres of Important Farmland to nonagricultural use. Alternative 2 would also affect 1,676 acres of Williamson Act lands within the DFAs. Mitigation Measures AG-1a (Minimize Impacts to Agricultural Resources), AG-1b (Develop an Agricultural Resources Protection Plan), AG-1c (Compensate for loss of Important Farmland), and AG-1d (Ensure Compatibility With or Terminate Williamson Act Contracts), would reduce impacts in part by ensuring restoration of agricultural sites after project decommissioning, and by requiring preservation of off-site agricultural land. However, the potential conversion of Important Farmland to nonagricultural use would still be a significant and unavoidable impact.

**AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.** Renewable energy and transmission development may impact adjacent agricultural land through damage to equipment, crops, and livestock from (1) increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) suppression plant growth by fugitive dust; (5) soil erosion; (6) spread of weeds; and (7) shading of crops. CMAs would minimize most of these impacts. In addition, Mitigation Measure AG-1a would require coordination with agricultural operations regarding construction schedules. With the implementation of this measure, impacts would be less than significant.

**IV.12.3.4.7 Comparison of Alternative 2 With the Preferred Alternative**

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative across all disciplines. This section summarizes the comparison of Alternative 2 with the Preferred Alternative.

**IV.12.3.4.7.1 Alternative 2 Compared With Preferred Alternative for Plan-wide DRECP**

Under Alternative 2, DFAs would be less clustered and wind development would be more prominent than under the Preferred Alternative. The Preferred Alternative would affect more Important Farmland than Alternative 2 (59,000 acres versus 50,000 acres). Reserve design for the Preferred Alternative and for Alternative 2 would both affect approximately 3,000 acres. Alternative 2 is projected to affect the smallest amount of agricultural land of all the action alternatives.
Geographic Distinctions. The Preferred Alternative would affect 43,000 acres in Imperial County and 11,000 acres in Riverside County. Alternative 2 would affect 37,000 acres of agricultural land in Imperial County and 9,000 acres in Riverside County.

IV.12.3.4.7.2 Preferred Alternative Compared With No Action Alternative for BLM LUPA

There is no designated Important Farmland on BLM land.

IV.12.3.4.7.3 Preferred Alternative Compared With No Action Alternative for NCCP

The agricultural impacts of the NCCP for Alternative 2 are the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis. As a result, the comparison of the Preferred Alternative with Alternative 2 for the NCCP is the same as described for the Plan-wide DRECP.

IV.12.3.4.7.4 Preferred Alternative Compared With No Action Alternative for the GCP

The agricultural impacts of the GCP for Alternative 2 would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis but would occur on nonfederal lands only.

IV.12.3.5 Alternative 3

IV.12.3.5.1 Plan-wide Impacts of Implementing the DRECP: Alternative 3

Potential impacts to agricultural resources resulting from renewable energy and transmission facility development under Alternative 3, by ecoregion subarea, are presented in Table R2.12-16 (Appendix R).

IV.12.3.5.1.1 Plan-wide Impacts and Mitigation Measures From Renewable Energy and Transmission Development

Impact Assessment

Under Alternative 3, DFAs are geographically dispersed and focused on potential solar and geothermal development.

Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.

Development of DFAs under Alternative 3 would convert 57,000 acres of Important Farmland to renewable energy use. This represents 8% of the total Important Farmland within the Plan Area. The acres of Important Farmland that would be affected would be for solar (40,000 acres), wind (500 acres), geothermal (8,000 acres), and transmission (8,000 acres). Alternative 3 would also affect 3,000 acres of Williamson Act lands within the DFAs.
These Williamson Act lands would be used for wind (70 acres), solar (2,000 acres), and transmission (200 acres).

Under Alternative 3 renewable energy development would affect Important Farmland in the following ecoregion subareas: Cadiz and Chocolate Mountains (13,000 acres), Imperial Borrego Valley (41,000 acres), and West Mojave and Eastern Slope (2,000 acres). Impacts by county are shown in Table IV.12-3 (Acres of Important Farmland Converted to Nonagri-cultural Use by County and Alternative).

**Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.**

These impacts would be the same as those described for the Preferred Alternative except that the geographic distribution of impacts would reflect development locations described for Impact AG-1 for Alternative 3.

**Impacts in Study Area Lands**

There is no Important Farmland in Study Area Lands. Therefore, Study Area Lands (including FAAs, SAAs, and DRECP Variance Lands) are not addressed in this section.

**Impact Reduction Strategies and Mitigation**

The implementation of the Plan would result in both conservation of some desert lands as well as development of renewable energy generation and transmission facilities on other lands. The impacts of renewable energy development covered by the Plan would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. Also, the implementation of existing laws, orders, regulations and standards would reduce the impacts of project development. If significant impacts would still result after both implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

**Conservation and Management Actions**

The conservation strategy for Alternative 3 (see Section II.3.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes definitions of the reserve design and specific CMAs for the Preferred Alternative. While the CMAs were developed for BLM lands only, this analysis assumes that all CMAs would also apply to nonfederal lands.
Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in Volume III, the Regulatory Setting. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.12.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will further reduce some of the DRECP’s adverse impacts.

IV.12.3.5.1.2 Impacts from Reserve Design

The Plan-wide impacts of the Alternative 3 reserve design on Important Farmland and Williamson Act land are shown in Appendix U and summarized here. The reserve design is described in Volume II for each alternative. Under Alternative 3, there are 7,605 acres of Important Farmland that overlap with Conservation Planning Areas.7

Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.

Under Alternative 3, a total of 4,000 acres of Important Farmland overlaps with the Reserve Design Lands. As discussed in Section IV.12.2.2, conservation lands within the reserve design and their associated CMAs limit disturbance and protect a variety of resources. However, restrictions tied to the reserve design and biological resources CMAs would likely prevent ongoing agricultural use of most Reserve Design Lands. Although conservation actions would not damage agricultural soils, Important Farmland would be converted to nonagricultural use. Conservation Planning Areas would also overlap with 2,000 acres of Williamson Act land, all in the West Mojave and Eastern Slopes ecoregion subarea. However, the reserve design and its associated CMAs would likely be compatible with enrollment in the Williamson Act, which allows for open space preservation in addition to active agricultural use.

Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.

Reserve Design Lands would not involve activities or facilities that would adversely impact adjacent agriculture.

7 Note that Conservation Planning Areas identified on private lands are not mandatory and would only be implemented if there are willing sellers.
IV.12.3.5.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 3

This section addresses two components of effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under the LUPA, and the impacts of the amended land use plans themselves.

IV.12.3.5.2.1 Impacts From Renewable Energy and Transmission Development on BLM Land

There is no designated Important Farmland on BLM land. See Section 12.1.1 for more detail.

IV.12.3.5.2.2 Impacts of Changes to BLM Land Designations

There is no designated Important Farmland on BLM land. See Section 12.1.1 for more detail.

IV.12.3.5.3 Impacts of Natural Community Conservation Plan: Alternative 3

The impacts of the NCCP for Alternative 3 would be the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis.

IV.12.3.5.4 Impacts of General Conservation Plan

The impacts of the GCP for Alternative 3 would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis, but would occur on nonfederal lands only.

IV.12.3.5.5 Impacts Outside the Plan Area

IV.12.3.5.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on agricultural land and production would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.12.3.1.5.1 (Impacts of Transmission Outside of Plan Area in No Action Alternative).

IV.12.3.5.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

Under the proposed BLM LUPA, the only changes outside the Plan Area would be the designation of NLCS lands, ACECs, National Scenic and Historic Trails Management Corridors, VRM Resource Management Classes, and new land allocations on CDCA lands. There is no designated Important Farmland on BLM land outside the Plan Area.
IV.12.3.5.6 CEQA Significance Determination for Alternative 3

Agricultural impacts and their associated significance determinations for Alternative 3 follow:

AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts. Under Alternative 3, renewable energy and transmission development and the reserve design would convert 61,000 acres of Important Farmland to nonagricultural use. Alternative 3 would also affect 3,000 acres of Williamson Act lands within the DFAs. Mitigation Measures AG-1a (Minimize Impacts to Agricultural Resources), AG-1b (Develop an Agricultural Resources Protection Plan), AG-1c (Compensate for Loss of Important Farmland), and AG-1d (Ensure Compatibility With or Terminate Williamson Act Contracts), would reduce impacts in part through ensuring restoration of agricultural sites after project decommissioning and partly through requiring preservation of off-site agricultural land. However, the potential conversion of Important Farmland to nonagricultural use would still be a significant and unavoidable impact.

AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations. Renewable energy and transmission development may impact adjacent agricultural operations through damage to equipment, crops, and livestock from (1) increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) suppression plant growth by fugitive dust; (5) soil erosion; (6) spread of weeds; and (7) shading of crops. CMAs would minimize most of these impacts. In addition, Mitigation Measure AG-1a would require construction schedule coordination with agricultural operations. With the implementation of this measure, impacts would be less than significant.

IV.12.3.5.7 Comparison of Alternative 3 With the Preferred Alternative

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative, across all disciplines. This section summarizes the comparison of Alternative 3 with the Preferred Alternative.

IV.12.3.5.7.1 Alternative 3 Compared With Preferred Alternative for Plan-wide DRECP

The DFAs for Alternative 3 are more dispersed than those for the Preferred Alternative, and solar and geothermal technologies would predominate. There would be impacts to agricultural resources under both Alternative 3 and the Preferred Alternative, though the Preferred Alternative would affect less Important Farmland than Alternative 3 (59,000 acres versus 61,000 acres). Under Alternative 3, more of this acreage (4,000 acres) would be affected by the reserve design than under the Preferred Alternative (3,000 acres).
**Geographic Distinctions.** The Preferred Alternative would affect 43,000 acres in Imperial County and 11,000 acres in Riverside County. Alternative 3 would affect fewer acres of agricultural land in Imperial County (41,000 acres) and more acres in Riverside County (13,000 acres).

**Preferred Alternative Compared With No Action Alternative for BLM LUPA**

There is no designated Important Farmland on BLM land.

**IV.12.3.5.7.2 Preferred Alternative Compared With No Action Alternative for NCCP**

The agricultural impacts of the NCCP for Alternative 3 are the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis. As a result, the comparison of the Preferred Alternative with Alternative 3 for the NCCP is the same as described for the Plan-wide DRECP.

**IV.12.3.5.7.3 Preferred Alternative Compared With No Action Alternative for the GCP**

The agricultural impacts of the GCP for Alternative 3 would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis but would occur on nonfederal lands only.

**IV.12.3.6 Alternative 4**

**IV.12.3.6.1 Plan-wide Impacts of Implementing the DRECP: Alternative 4**

Potential impacts to agricultural resources from renewable energy and transmission facility development under Alternative 4 are shown in Table R2.12-20 (Appendix R).

**IV.12.3.6.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development**

**Impact Assessment**

Under Alternative 4, renewable energy project activities covered by the Plan would be confined to DFAs.

**Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.**

Development of the DFAs under Alternative 4 would convert 53,000 acres of Important Farmland to renewable energy use. This represents 7% of the total Important Farmland within the Plan Area. The acres of Important Farmland that would be affected would be for solar (36,000 acres), wind (600 acres), geothermal (8,000 acres), and transmission (8,000...
Alternative 4 would also affect 3,000 acres of Williamson Act lands within the DFAs. These Williamson Act lands would be used for wind (100 acres), solar (2,000 acres), and transmission (500 acres).

Under Alternative 4, renewable energy and transmission development would affect Important Farmland in the following ecoregion subareas: Cadiz and Chocolate Mountains (16,000 acres), Imperial Borrego Valley (34,000 acres), and West Mojave and Eastern Slope (2,000 acres). Impacts by county are shown in Table IV.12-3 (Acres of Important Farmland Converted to Nonagricultural Use by County and Alternative).

**Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.**

These impacts would be the same as those described for the Preferred Alternative except that the geographic distribution of impacts would reflect the development locations described for Impact AG-1 for Alternative 4.

**Impacts in Study Area Lands**

There is no Important Farmland in Study Area Lands. Therefore, Study Area Lands (including FAAs, SAAs, and DRECP Variance Lands) are not addressed in this section.

**Impact Reduction Strategies and Mitigation**

The implementation of the Plan would result in both conservation of some desert lands and development of renewable energy generation and transmission facilities on other lands. The impacts of this development would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. Also, the implementation of existing laws, orders, regulations and standards would reduce the impacts of project development. If significant impacts would still result after both implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

**Conservation and Management Actions**

The conservation strategy for Alternative 4 (see Section II.3.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes definition of the reserve design and specific CMAs for the Preferred Alternative. While the CMAs were developed for BLM lands only, this analysis assumes that all CMAs would also apply to nonfederal lands.
Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in Volume III, the Regulatory Setting. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.12.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will further reduce some of the DRECP’s adverse impacts.

IV.12.3.6.1.2  Impacts from Reserve Design

The Plan-wide impacts of the Alternative 4 reserve design on Important Farmland and Williamson Act land are shown in Appendix U and summarized here. The reserve design is described in Volume II for each alternative. Under Alternative 4, 4,000 acres of Important Farmland would overlap with Conservation Planning Areas.

Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.

Under Alternative 4, a total of 4,000 acres of Important Farmland is within Conservation Planning Areas. As discussed in Section IV.12.2.2, conservation lands within the reserve design and their associated CMAs limit disturbance and protect a variety of resources. However, restrictions tied to the reserve design and Biological Resources CMAs would likely prevent ongoing agricultural use of most Reserve Design Lands. Although conservation actions would not damage agricultural soils, Important Farmland would be converted to nonagricultural use. Conservation Planning Areas also include 700 acres of Williamson Act land. However, the reserve design and its associated CMAs would likely be compatible with enrollment in the Williamson Act, which allows for open space preservation in addition to active agricultural use.

Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.

Reserve Design Lands would not involve activities or facilities that would adversely impact adjacent agriculture.
**IV.12.3.6.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 4**

This section addresses two components of effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under the LUPA, and the impacts of the amended land use plans themselves.

**IV.12.3.6.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land**

There is no designated Important Farmland on BLM land. See Section 12.1.1 (General Methods) for more detail.

**IV.12.3.6.2.2 Impacts of Changes to BLM Land Designations**

There is no designated Important Farmland on BLM land.

**IV.12.3.6.3 Impacts of Natural Community Conservation Plan: Alternative 4**

The impacts of the NCCP for Alternative 4 would be the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis.

**IV.12.3.6.4 Impacts of General Conservation Plan**

The impacts of the GCP for Alternative 4 would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis, but would occur on nonfederal lands only.

**IV.12.3.6.5 Impacts Outside the Plan Area**

**IV.12.3.6.5.1 Impacts of Transmission Outside the Plan Area**

The impacts of transmission outside the Plan Area on agricultural land and production would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.12.3.1.5.1.

**IV.12.3.6.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area**

Under the proposed BLM LUPA, the only changes outside the Plan Area would be the designation of NLCS lands, ACECs, National Scenic and Historic Trails Management Corridors, VRM Resource Management Classes, and new land allocations on CDCA lands. There is no designated Important Farmland on BLM land outside the Plan Area.
**IV.12.3.6.6 CEQA Significance Determination for Alternative 4**

The agricultural impacts and their associated significance determinations for Alternative 4 follow:

**AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts.** Under Alternative 4, renewable energy and transmission development and the reserve design would convert 57,000 acres of Important Farmland to nonagricultural use. Alternative 4 would also affect 4,000 acres of Williamson Act lands within the DFAs. Mitigation Measures AG-1a (Minimize Impacts to Agricultural Resources), AG-1b (Develop an Agricultural Resources Protection Plan), AG-1c (Compensate for Loss of Important Farmland), and AG-1d (Ensure Compatibility With or Terminate Williamson Act Contracts) would reduce impacts in part through ensuring restoration of agricultural sites after project decommissioning and partly through requiring preservation of off-site agricultural land. However, the potential conversion of Important Farmland to nonagricultural use would still be a significant and unavoidable impact.

**AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations.** Renewable energy and transmission development may impact adjacent agricultural land through damage to equipment, crops, and livestock from (1) increased traffic on farm roads; (2) competition for water resources, including groundwater; (3) water and soil contamination; (4) suppression plant growth by fugitive dust; (5) soil erosion; (6) spread of weeds; and (7) shading of crops. CMAs would minimize most of these impacts. In addition, Mitigation Measure AG-1a would require construction schedule coordination with agricultural operations. With the implementation of this measure, impacts would be less than significant.

**IV.12.3.6.7 Comparison of Alternative 4 With the Preferred Alternative**

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative across all disciplines. This section summarizes the comparison of Alternative 4 with the Preferred Alternative.

**IV.12.3.6.7.1 Alternative 4 Compared With Preferred Alternative for Plan-wide DRECP**

Under Alternative 4, the DFAs are smaller and more dispersed than under the Preferred Alternative and more priority is given to solar and wind technologies. There would be impacts to agricultural resources under both Alternative 4 and the Preferred Alternative. The Preferred Alternative would affect more Important Farmland than Alternative 4 (59,000 acres versus 57,000 acres). Under Alternative 4, slightly more of this acreage
(4,000 acres) would be affected by Conservation Planning Areas than under the Preferred Alternative (3,000 acres).

**Geographic Distinctions.** The Preferred Alternative would affect 43,000 acres in Imperial County and 11,000 acres in Riverside County. Alternative 4 would affect fewer acres of agricultural land in Imperial County (34,000 acres) and more acres in Riverside County (16,000 acres).

**IV.12.3.6.7.2 Preferred Alternative Compared With No Action Alternative for the BLM LUPA**

There is no designated Important Farmland on BLM land.

**IV.12.3.6.7.3 Preferred Alternative Compared With No Action Alternative for NCCP**

The agricultural impacts of the NCCP for Alternative 4 are the same as those defined in Section IV.12.3.2.1 for the Plan-wide analysis. As a result, the comparison of the Preferred Alternative with Alternative 4 for the NCCP is the same as described for the Plan-wide DRECP.

**IV.12.3.6.7.4 Preferred Alternative Compared With No Action Alternative for the GCP**

The agricultural impacts of the GCP for Alternative 4 would be similar to those defined in Section IV.12.3.2.1 for the Plan-wide analysis but would occur on nonfederal lands only.
Sources: ESRI (2014); CEC (2013); BLM (2013); CDFW (2013); USFWS (2013); California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (2010)
FIGURE IV.12-3
Important Farmland within DFAs - Alternative 1

Sources: ESRI (2014); CEC (2013); BLM (2013); CPW (2013); USFWS (2013); California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (2010)

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Important Farmland within DFAs - Alternative 2

Sources: ESRI (2014); CEC (2013); BLM (2013); CDFW (2013); USFWS (2013); California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (2010)

FIGURE IV.12-4
Draft DRECP and EIR/EIS
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FIGURE IV.12-5

Important Farmland within DFAs - Alternative 3

Sources: ESRI (2014); CEC (2013); BLM (2013); CDFW (2013); USFWS (2013); California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (2010).

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Important Farmland within DFAs - Alternative 4

August 2014
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