

Abengoa Mojave Solar Project - Agricultural Impacts & Mitigation

From: Hyke, Carrie - LUS [<mailto:chyke@lusd.sbcounty.gov>]
Sent: Friday, April 02, 2010 12:56 PM
To: Susanne Huerta
Subject: Abengoa Mojave Solar Project - Agricultural Impacts & Mitigation

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Hi Susanne,

We discussed this matter internally and the following is provided for your use.

The California Department of Conservation's Farmland Mapping program began in the 1960s as a method of tracking changes (i.e. loss of Farmlands) over time. This was a result of the greater awareness of the ongoing loss of California farmland to suburbanization, city annexations, new city formations, development of airports, development of public lands, expansions of military sites, etc. For the purposes of categorizing farmland, DOC established categories such as "Prime Farmland" and "Farmland of Statewide Importance", etc. Although such categorizations provided a level of clarity for performing environmental reviews (compared with a general lack of information, prior), the bottom-line is that today "mitigation" is not solely based on CDC's Farmland Mapping. Also, "mitigation" is not solely based on CDC's Farmland Mapping because this mapping was performed Statewide, on a macro-scale level.

The County follows the LESA Model. NRCS information was prepared at a more local level, and the LESA Model is intended to be applied at the project-level. If the analysis backs the NRCS designation of 1588.5 acres of "Important Farmland" lost due to the proposed development (and it appears, from the information provided below, that it does), then, if the County were the permitting agency, the County should include a mitigation measure requiring replacement of the 1588.5 acres of "Important Farmland" on a 1:1 ratio. Also, it should be verified whether, or not, the portion that is "Prime Farmland" (particularly if it is irrigated "Prime Farmland") is to be mitigated at a replacement ratio greater than 1:1.

From: Susanne Huerta [<mailto:SHuerta@aspeneq.com>]
Sent: Thursday, March 25, 2010 2:46 PM
To: Hyke, Carrie - LUS
Cc: Negar Vahidi
Subject: RE: Abengoa Mojave Solar Project - Agricultural Impacts

Hi Carrie,

As we have discussed in the emails below, based on our analysis of agricultural impacts we have recommended replacement mitigation for the loss of agricultural land.

Just to give you background on the analysis, according to the California Department of Conservation's Farmland Mapping and Monitoring Program, the project site contains 71 acres of Prime Farmland and 57 acres of Farmland of Statewide Importance (128 acres total). The applicant has proposed replacement mitigation at a 1:1 ratio for this conversion (128 acres). However, based on National Resource Conservation Service (NRCS) designations, the proposed project would convert approximately 882.5 acres Farmland of Statewide Importance and approximately 706 acres of Prime Farmland if Irrigated (a total of 1,588.5 acres of Important Farmland). In addition, the LESA Model was conducted based on NRCS designations, which resulted in a significant score of 59.89.

As this NRCS designation and the finding of significance from the LESA Model are the results of multiple factors (including soil quality, availability of water, and the size of the project site), these qualities unequivocally designate the project site as an area well-suited for agricultural production. Development of any other land use would permanently preclude the site from farmland activities and would result in the conversion of 1,588.5 acres of agriculturally viable land. Therefore, our analysis recommends replacement mitigation for the loss of agricultural land, and states that the acreage for mitigation should be based on the NRCS designation - 1,588.5 acres of Important Farmland.

As part of this analysis, CEC/Aspen would appreciate the County's position on this issue. In particular, given the current level of agricultural activity onsite and in the surrounding area, if the County were the permitting agency would replacement mitigation be required? If so, would the County recommend 128 acres of replacement (based on FMMP designations) or 1,588.5 acres of replacement (based on NRCS designations)?

Please call me if you would like to discuss this or have any questions.

Thank you,

Susanne Huerta
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