



September 24, 2019

**VIA EMAIL: [CATESR@KERNCOUNTY.COM](mailto:CATESR@KERNCOUNTY.COM)**

Randall Cates  
Kern County  
Planning and Natural Resources Department  
2700 "M" Street, Suite 100  
Bakersfield, CA 93301

Governor's Office of Planning & Research

**SEP 24 2019**

**STATE CLEARINGHOUSE**

Dear Mr. Cates:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE AVEP SOLAR PROJECT, SCH# 2019090215

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

#### Project Description

AVEP Solar Project (proposed project), would develop three photovoltaic (PV) solar facilities and associated infrastructure necessary to generate a combined total of approximately 375 megawatts (MW) of renewable electrical energy including associated energy storage systems on approximately 2,117 acres of privately-owned land. The proposed project consists of three solar facilities: Chaparral Solar Facility, Rabbitbrush Solar Facility, and Tumbleweed Facility, which are 764 acres, 632 acres, and 721 acres in size, respectively. The project is located approximately 5½ miles west of the unincorporated community of Rosamond on 75 parcels.

#### Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.<sup>1</sup> All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out

<sup>1</sup> Public Resources Code section 21002.

unless it is infeasible based on its elements.

Agricultural conservation easements on land of at least equal quality and size can mitigate the project impacts in accordance with CEQA Guideline § 15370. The Department highlights agricultural conservation easements because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA. Agricultural conservation easements are an available mitigation tool and should always be considered; however, any other feasible mitigation measures should also be considered.

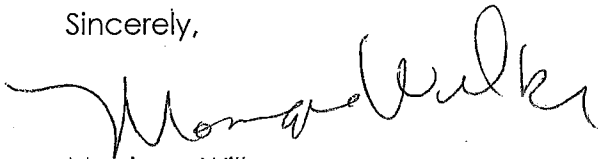
### Conclusion

The Department recommends the following discussion under the Agricultural Resources section of the DEIR:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measure for all impacted agricultural lands within the proposed project area.

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

Sincerely,



Monique Wilber  
Conservation Program Support Supervisor