

**DEPARTMENT OF CONSERVATION**  
 DIVISION OF ADMINISTRATION  
 DIVISION OF MINES AND GEOLOGY  
 DIVISION OF OIL, GAS AND GEOTHERMAL RESOURCES  
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November 15, 1996

Mr. Tim Vasquez, Chief  
 Environmental Analysis Branch "A"  
 Caltrans District 11  
 P.O. Box 85406  
 San Diego, CA 92186-5406

**Subject:** Notice of Preparation (NOP) for the Brawley Bypass Study

Dear Mr. Vasquez:

The Department of Conservation (Department), which monitors farmland conversion on a statewide basis, has reviewed the above referenced NOP for the realignment and construction of 12.4 miles of State Routes 78 and 111. The Department offers the following comments.

The proposed project includes construction of a four-lane limited access expressway through the Brawley-Westmorland area. The NOP notes that the project may impact Prime Farmland and Farmland of Statewide Importance, be growth inducing, and make changes in land use and vehicular traffic patterns. Therefore, the Department recommends that the following information be provided in the Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS) to provide a comprehensive discussion of the project's impacts on agricultural resources.

Prime Agricultural Land

The California Code of Regulations (Section 15000 et seq., Appendix G [y]) states that a project will normally have a significant effect on the environment if it converts prime agricultural land to non-agricultural use or impairs the agricultural productivity of prime agricultural land. In order to quantify impacts on prime agricultural land, the Department recommends that the DEIR/DEIS identify the location of prime agricultural land within the project site and the number of acres of prime land that will be developed for the project.

Agriculturally Significant Soils in the Project Area

Existing and potential agricultural activity is determined by significant soil types, as defined by the Department's Important Farmland series map designations. The Department recommends the DEIR/DEIS include a map identifying the agriculturally significant soil types in the project area. A copy of the Department's 1994 Imperial County Important Farmland Map is enclosed for reference.

Agricultural Production Data and Economic Multiplier

To compare project alternatives, the following data on the agricultural character of the project area could be included in the DEIR/DEIS:

- A discussion of current and past agricultural use of the project area and data on types of crops grown, yields, and crop values.
- The inclusion of an economic multiplier could be helpful in assessing the total agricultural value of the project area to the economy. For your assistance, enclosed is an example of an

agricultural crop value table and crop values completed by the University of California Cooperative Extension's study titled "Economic Impacts of Agricultural Production and Processing in Stanislaus County".

#### Farmland Conversion Impacts

The California Code of Regulations Section 15130 requires that a project's cumulative and growth-inducing impacts be identified. The Department suggests the DEIR/DEIS discuss the project's impacts as follows:

- The type, amount, and location of farmland conversion resulting from project development.
- Impacts on current and future agricultural operations as well as impacts of the project on segmenting or limiting access to agricultural parcels.
- Cumulative and growth-inducing impacts.

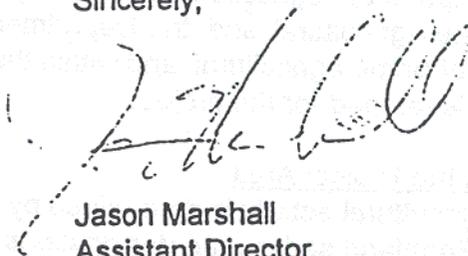
#### Mitigation Measures and Alternatives

Mitigation measures and alternatives to lessen farmland conversion impacts could be discussed in the DEIR/DEIS. The following are measures that may mitigate future agricultural land conversion.

- Directing the project onto lower quality soils in order to protect prime agricultural land and to avoid growth inducement on prime agricultural land.
- Establishing buffers such as setbacks, berms, greenbelts, and open space areas to separate farmland from urban uses.
- Implementing right-to-farm ordinances.
- Encouraging development of agricultural lands already compromised by adjacent urban development or contain property required for the extension of infrastructure or other public facilities, before considering development on agricultural lands that are not subject to such urban pressures.

The Department appreciates the opportunity to comment on the NOP. If I can be of further assistance, please phone me at (916) 445-8733.

Sincerely,



Jason Marshall  
Assistant Director  
Office of Governmental and Environmental Relations

Enclosures

cc: Kenneth E. Trott, Office of Land Conservation  
Bill Condit, President, Imperial Irrigation District