# 3.2 Agricultural Resources

Agriculture is an important part of San Luis Obispo County's economy, and the preservation of agricultural land is a major priority for the County. The county's diverse agriculture production includes over 100 different crops, with fruit and vegetables as the largest sector economically. Siting renewable energy projects in areas with valuable agricultural soils, strong agricultural infrastructure, and long-established agricultural communities could impact the County's efforts to support agricultural preservation and a prosperous agricultural economy. This section describes existing agricultural areas in San Luis Obispo County, characterizes agricultural land uses, and discusses adopted plans and policies pertinent to the region. The analysis then addresses potential impacts associated with the Renewable Energy Streamlining Program (RESP or Program).

## 3.2.1 PHYSICAL SETTING

The inland areas of the county have relatively hot, dry summers, while areas closer to the coast have milder year-round temperatures. Some of the county's highest-value crops are grown on soils that are not classified as Prime Farmland. The current distribution of high-value crops in the county is related to a number of factors, including natural resources, climate, land use, and access to transportation networks.

The value of San Luis Obispo County's agricultural crops was $861,803,000 in 2012 (SLO County Department of Agriculture 2012), and a recent study indicates that agriculture contributes $1.87 billion annually to the county's economy (Agricultural Impact Associates 2013). The county's 20 highest value crops in 2012 are shown in **Table 3.2-1**.

**TABLE 3.2-1**
**SAN LUIS OBISPO COUNTY'S HIGHEST VALUE CROPS IN 2012**

| | | | |
|---|---|---|---|
| 1. Strawberries | $205,000,000 | 11. Napa Cabbage | $12,042,000 |
| 2. Wine Grapes (all) | $197,940,000 | 12. Rangeland Grazed | $10,200,000 |
| 3. Cattle/Calves | $69,492,000 | 13. Lemons | $9,064,000 |
| 4. Broccoli | $51,177,000 | 14. Celery | $8,676,000 |
| 5. Vegetable Transplants | $32,227,000 | 15. Cauliflower | $6,665,000 |
| 6. Cut Flowers | $23,821,000 | 16. Leaf Lettuce | $5,938,000 |
| 7. Indoor Decorative Plants | $20,772,000 | 17. Bell Peppers | $5,492,000 |
| 8. Avocados | $18,419,000 | 18. Alfalfa Hay | $4,211,000 |
| 9. Head Lettuce | $13,183,000 | 19. Grain Hay | $4,153,000 |
| 10. Outdoor Ornamentals | $12,750,000 | 20. Cabbage | $4,148,000 |

*Source: SLO County Department of Agriculture 2012*

### Farmland Classification

County agricultural zoning is shown in **Figure 3.2-1**. Under the County's General Plan and zoning ordinances, 1,392,186 acres are designated for agricultural use.[1]

[1] This acreage represents zoning designations only. The number of acres designated for agriculture does not exactly equal any particular characterization of agricultural soil quality.

Important farmland is designated in a variety of ways by different agencies. The primary method of classifying farmland for this EIR is the County's designation and mapping of Important Agricultural Soils, which takes into account both federal and state farmland classifications as described below.

County of San Luis Obispo Important Agricultural Soils

The County's Conservation and Open Space Element (COSE) designates Important Agricultural Soils and includes several goals and policies related to conserving these soils. Designated Important Agricultural Soils are mapped in Figure SL-1 and listed in Table SL-2 of the Conservation and Open Space Element. **Figure 3.2-2a** shows designated Important Agricultural Soils throughout the county. **Figure 3.2-2b** shows the county's designated Important Agricultural by category. The county's Important Agricultural Soil types are as follows:

- **Prime Farmland**. The Conservation and Open Space Element defines Prime Farmland using both federal and state definitions of land that are considered "prime" lands for farming. The US Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) has defined these lands as "prime farmland" in the Code of Federal Regulations for Agriculture. The State of California also defines lands that are prime for farming as prime agricultural land. Prime Agricultural Soils are defined in the County's Agriculture Element, Land Use Ordinance, and Coastal Zone Land Use Ordinance.
- **Farmland of Statewide Importance**. Farmland of Statewide Importance is defined by the NRCS in the Code of Federal Regulations for Agriculture. Like Prime Farmland, this category is based on physical and chemical properties of the soil, not whether land is irrigated.
- **Other Productive Soils**. This category includes Unique Farmland, as defined by the NRCS in the Code of Federal Regulations for Agriculture. Most soils must have a soil slope of 30 percent or less and all must meet at least two of the following three criteria: (1) Storie Index rating is fair, good, or excellent; (2) Irrigated Capability Class is 1–6; and (3) more than 3 percent of the soil type is in irrigated/permanent crop use as of 2008. Criteria 1 and 2 are based on information from the Web Soil Survey. Criterion 3 is based on GIS cropland mapping by the San Luis Obispo County Department of Agriculture.
- **Highly Productive Rangeland Soils**. These soils meet all of the following criteria as identified on the Web Soil Survey: (1) produce forage that is equivalent to 60 percent or more of the maximum normal year forage production for that soil survey area; (2) majority of the forage produced is herbaceous; and (3) slope is less than 30 percent (except select soil types).

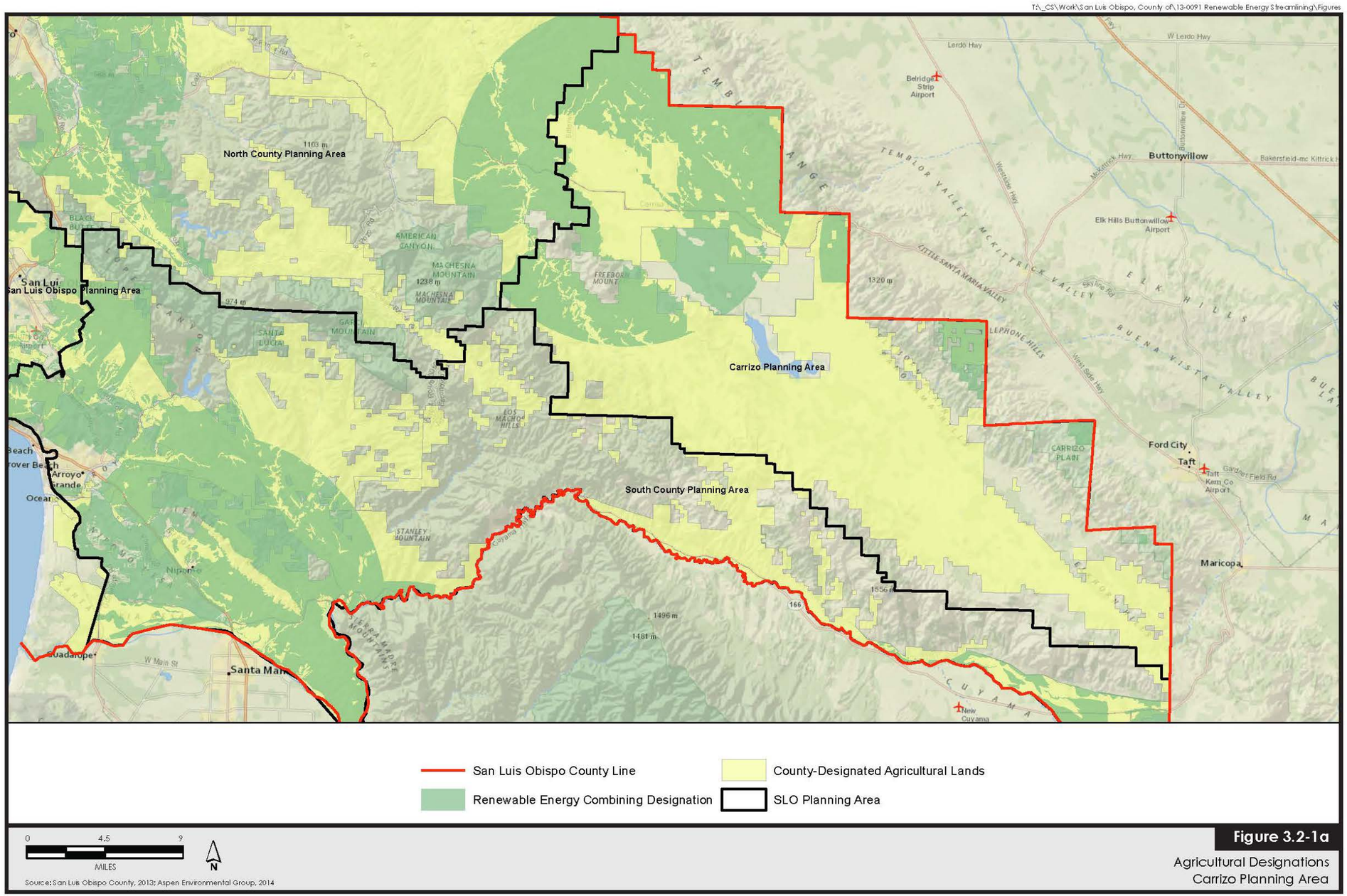


**Figure 3.2-1a**
Agricultural Designations
Carrizo Planning Area

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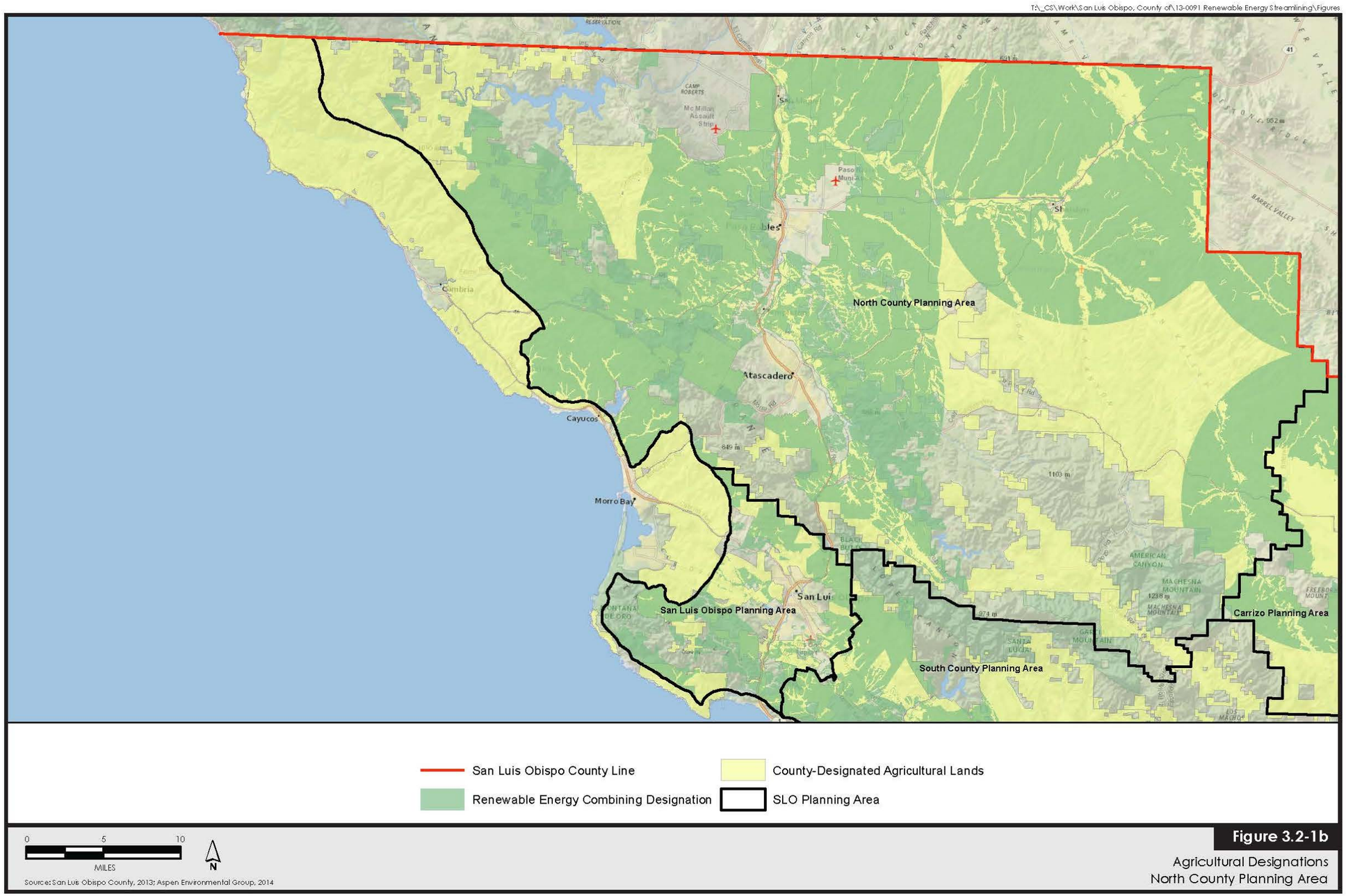


**Figure 3.2-1b**
Agricultural Designations
North County Planning Area

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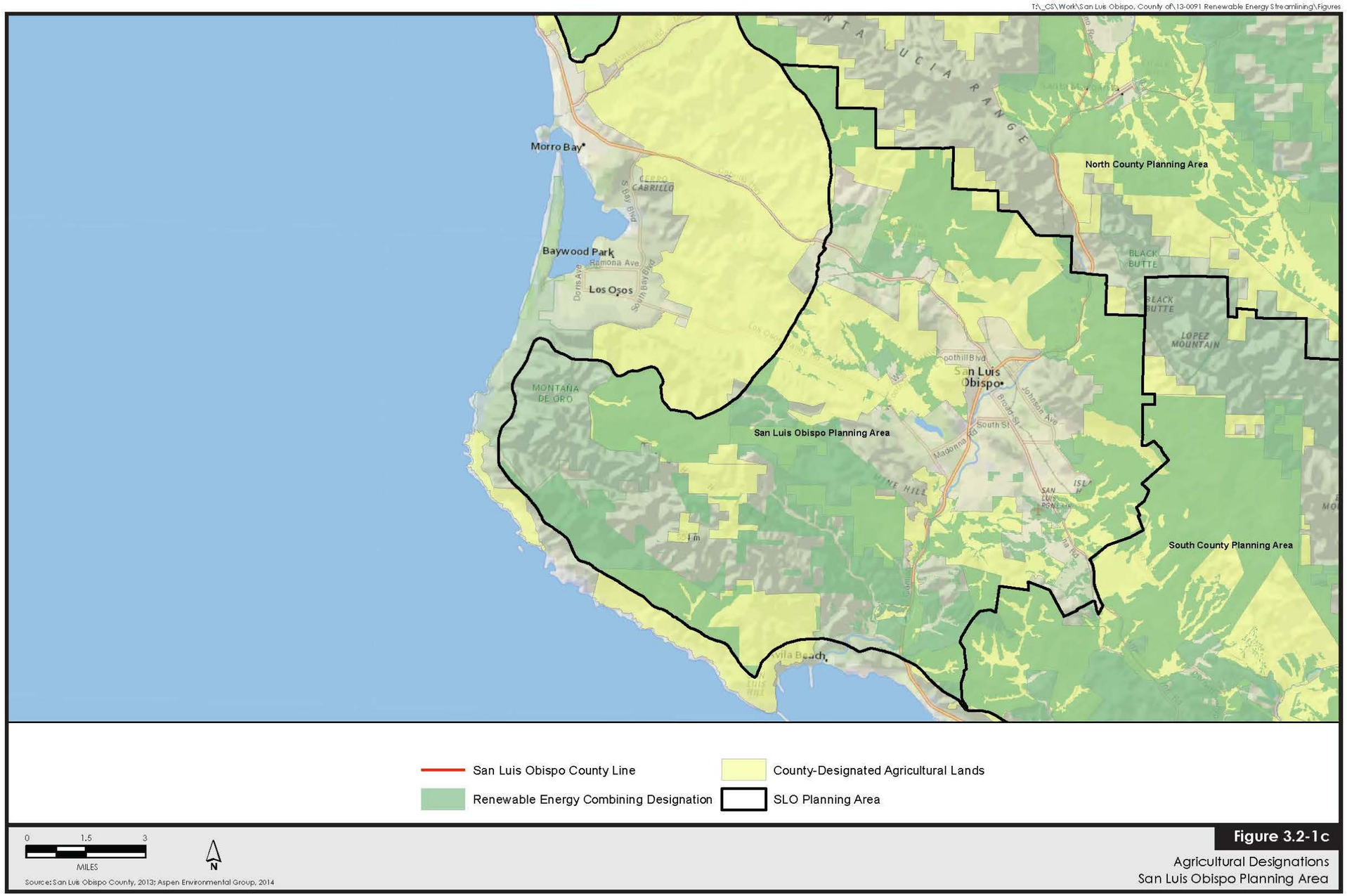


**Figure 3.2-1c**
Agricultural Designations
San Luis Obispo Planning Area

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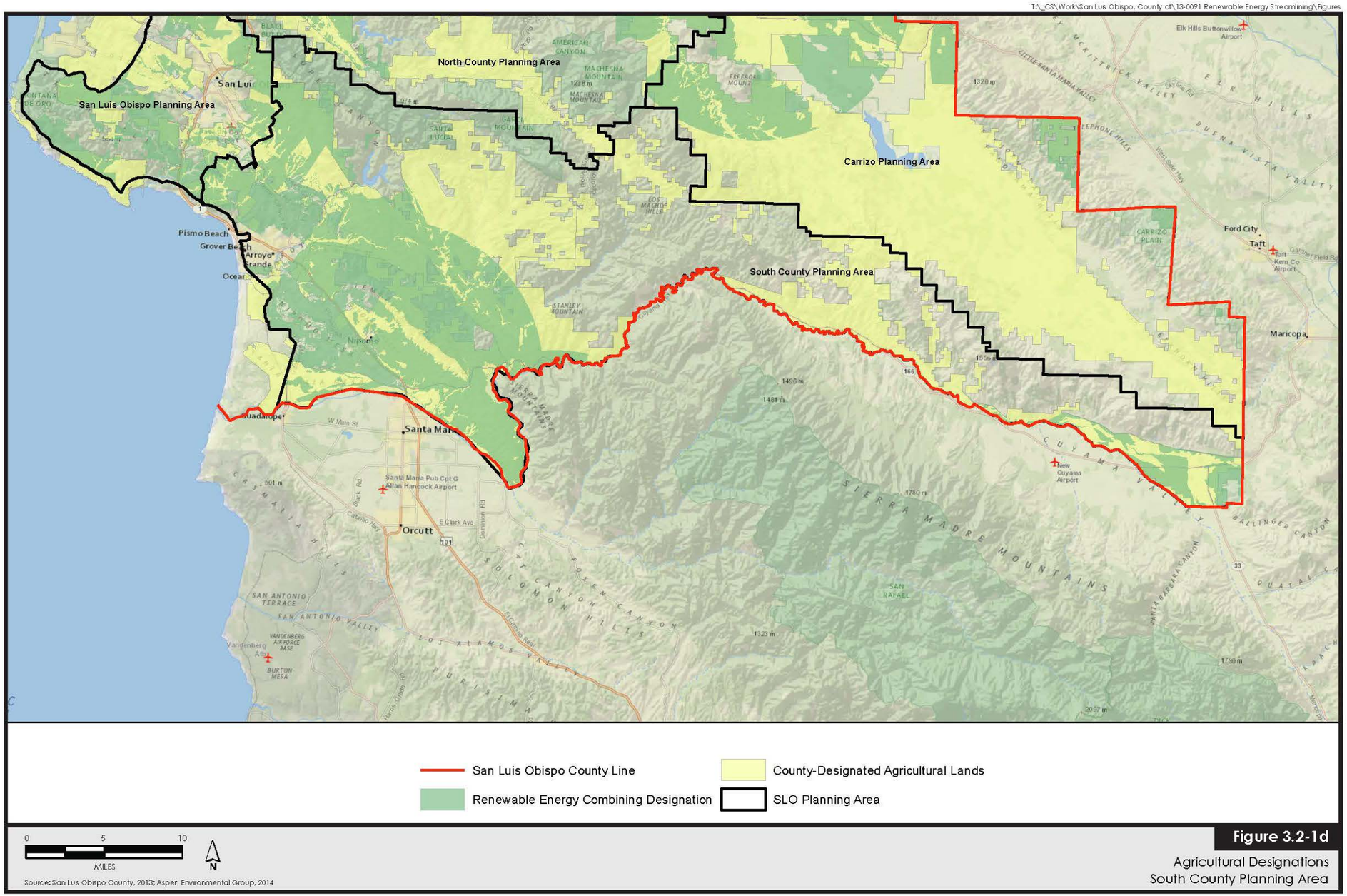


**Figure 3.2-1d**
Agricultural Designations
South County Planning Area

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The countywide acreage of Important Agricultural Soils is shown in **Table 3.2-2**.

**TABLE 3.2-2**
**SAN LUIS OBISPO COUNTY IMPORTANT AGRICULTURAL SOILS**

| Category | Acres |
|---|---|
| Prime Farmland | 320,016 |
| Statewide Importance | 92,092 |
| Other Productive Soils | 223,695 |
| Highly Productive Range Soils | 114,581 |
| Total | 750,384 |

*Source: SLO County 2013*

## California Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) applies the NRCS soil classifications and land use information to identify agricultural lands. Described below are the agricultural lands categories mapped by the FMMP.

- **Prime Farmland**. Farmland that has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Farmland of Statewide Importance**. Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Unique Farmland**. Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include nonirrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
- **Farmland of Local Importance**. Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.
- **Grazing Land**. Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, the University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres.
- **Urban and Built-Up Land**. Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Land Capability Classification

The Land Capability Classification indicates the suitability of a soil for growing field crops based on factors including slope, depth, texture, erosion, wetness, permeability, and fertility (USDA 2014). The Land Capability Classification rates soils based on their ability to grow crops without loss of production over time. Soils are rated as Class 1 to Class 8, with Class 1 being the best suited for agriculture. The classes are defined as follows:

- Class 1 soils have slight limitations that restrict their use.
- Class 2 soils have moderate limitations that reduce the choice of plants or require moderate conservation practices.
- Class 3 soils have severe limitations that restrict the choice of plants or require special conservation practices, or both.
- Class 4 soils have very severe limitations that restrict the choice of plants or require very careful management, or both.
- Class 5 soils have little or no hazard of erosion, but have other limitations, impractical to remove, that limit their use mainly to pasture, range, forestland, or wildlife food and cover.
- Class 6 soils have severe limitations that make them generally unsuited to cultivation and that limit their use mainly to pasture, range, forestland, or wildlife food and cover.
- Class 7 soils have very severe limitations that make them unsuited to cultivation and that restrict their use mainly to grazing, forestland, or wildlife.
- Class 8 soils and miscellaneous areas have limitations that preclude their use for commercial plant production and limit their use to recreation, wildlife, or water supply or for aesthetic purposes.

Subclasses are sometimes connected with several of the above soil classes to provide additional information by indicating the dominant limiting factor for production, including susceptibility to erosion, poor drainage, shallow rooting zone, or climate.

### Williamson Act Lands

The Williamson Act (California Land Conservation Act of 1965) enables participating local governments to enter into land conservation contracts with private landowners restricting specific parcels of land to agricultural uses for a minimum term of 10 years in return for reduced property tax assessments.

The Williamson Act program is locally administered by counties (and some cities) to ensure compliance with the Williamson Act (Government Code Sections 51200–51207), local uniform rules, and individual contracts. The California Department of Conservation (DOC) provides guidance and oversight to local governments to ensure consistency with the Government Code. Starting in 1972, the State provided counties with partial replacement of foregone local property tax revenues (Open Space Subvention Act). These subvention payments were suspended in 2009 due to state-level budget constraints.

Establishment of an agricultural preserve is a prerequisite for landowners to enter into a land conservation contract with a county. A land conservation contract is a contract entered into by and between the property owner and lien holders (if any) and the county to restrict the use of the land for agricultural and compatible uses for a minimum term of 10 years or more. Each

year, the contract automatically renews unless a notice of nonrenewal is served on the county or city, a public acquisition occurs, or an application for cancellation is approved. In return, the land is taxed based on the income generated from the agricultural use of the land as opposed to its unrestricted market value.

Local program eligibility is based on acreage, soil type, intensity of agricultural use, and irrigated or nonirrigated status. Minimum acreage requirements for contracts within prime-land preserves start at 10 acres for Class 1 and 2 irrigated cropland, 20 acres for irrigated orchards and vineyards on lesser quality soil, and 40 acres for irrigated Class 3 and 4 soils with crops such as irrigated alfalfa. Dry farmland requires 160 acres and grazing land requires a minimum of 320 acres to qualify for an agricultural preserve and contract. County Williamson Act land is shown in **Figures 3.2-4a** through **3.2-4d**.

A significant amount of land in the county is under longstanding land conservation contract, much of it from the early to mid 1970s. Although the acreage fluctuates from year to year as new contracts are entered into and some terminate due to nonrenewal or public acquisition, as of January 1, 2013, there were 786,483 acres enrolled in Williamson Act contracts in San Luis Obispo County (SLO County Assessor 2013). This acreage represents approximately 37 percent of the land in the county (not including state and federal land).

Due to abuses of the program in some localities, a significant revision to the Williamson Act known as the Laird Bill was passed in 2004, which tightened up permissible land uses on contracted land. Landowners violating these new provisions can be subject to significant fines if structures and land uses are found to be in "material breach."

### Other Protected Agricultural Areas

Conservation easements are partial interests in land that allow easement holders (usually land trusts or public agencies) to restrict land uses on private properties. A landowner sells or donates the rights to use the property in certain ways (e.g., subdivide and develop, convert to nonagricultural use), and these rights are permanently severed from the underlying title to the property. All future owners are bound by the original conservation easement restrictions. Agricultural lands covered by conservation easements would be off limits to renewable energy development unless such development is specifically allowed in the conservation easement agreement covering the property.

There are conservation easements, including agricultural preservation easements, throughout the county. Just one of these easements, Hearst Ranch, covers approximately 80,000 acres. Because the conservation easements are on private land, they are more difficult to track than public protected lands. In California, conservation easements created using any public funds are supposed to be tracked in the statewide conservation easement registry, but this registry holds basic information for only a small percentage of the easements in California (Morris and Rissman 2010). As of 2001, all conservation easements are also supposed to be indexed by county recorders, per California Government Code Section 27255.

## Important Farmland and Williamson Act Land by Planning Area

A summary of the agricultural resources in each planning area is included **Table 3.2-3**.

**TABLE 3.2-3**
**ACRES OF AGRICULTURAL LAND BY PLANNING AREA[1]**

| | Planning Area | | | |
|---|---|---|---|---|
| | **Carrizo** | **North County** | **San Luis Obispo** | **South County** |
| County-Designated Agriculture Land | 265,253 | 737,944 | 43,236 | 228,301 |
| **County-Designated Important Agriculture Soils** | | | | |
| Prime | 115,946 | 131,976 | 11,566 | 41,324 |
| Statewide Importance | 0 | 0 | 4,013 | 0 |
| Important Rangeland Soils | 51,226 | 0 | 2,427 | 7,076 |
| Other | 59 | 181,101 | 6,915 | 19,846 |
| Total[2] | *167,231* | *313,077* | *24,921* | *68,246* |
| **Williamson Act and Farmland Security Zone** | | | | |
| Williamson Act | 103,717 | 490,319 | 16,234 | 109,262 |
| Farmland Security Zone | 0 | 296 | 0 | 0 |

*Source: SLO County 2013*

*1. The Coastal Zone Planning Area is excluded because it is not covered by the RESP.*

*2. Only Important soils; Agriculture designation also occurs on other soils not designated as Important.*

### Carrizo Planning Area

The Carrizo Planning Area contains 265,253 acres of County-designated agricultural land, including 167,231 acres of Important Agricultural Soils and 103,717 acres enrolled in Williamson Act contracts. The Carrizo Planning Area consists of undulating terrain devoted almost exclusively to dry farming and rangeland. Agriculture has traditionally has been the principal industry in the region (SLO County 2014a).

Irrigated production has increased during the last 10 years, particularly vineyards and alfalfa in the north end of the planning area. The rest of the planning area uses relatively little water for dry farm and grazing operations, but the bottomland acreages suitable for irrigation are constrained by available water supplies. Therefore, the estimated safe annual yield of the underlying basins might be insufficient to irrigate all lands of otherwise suitable topography and soil (SLO County 2014a).

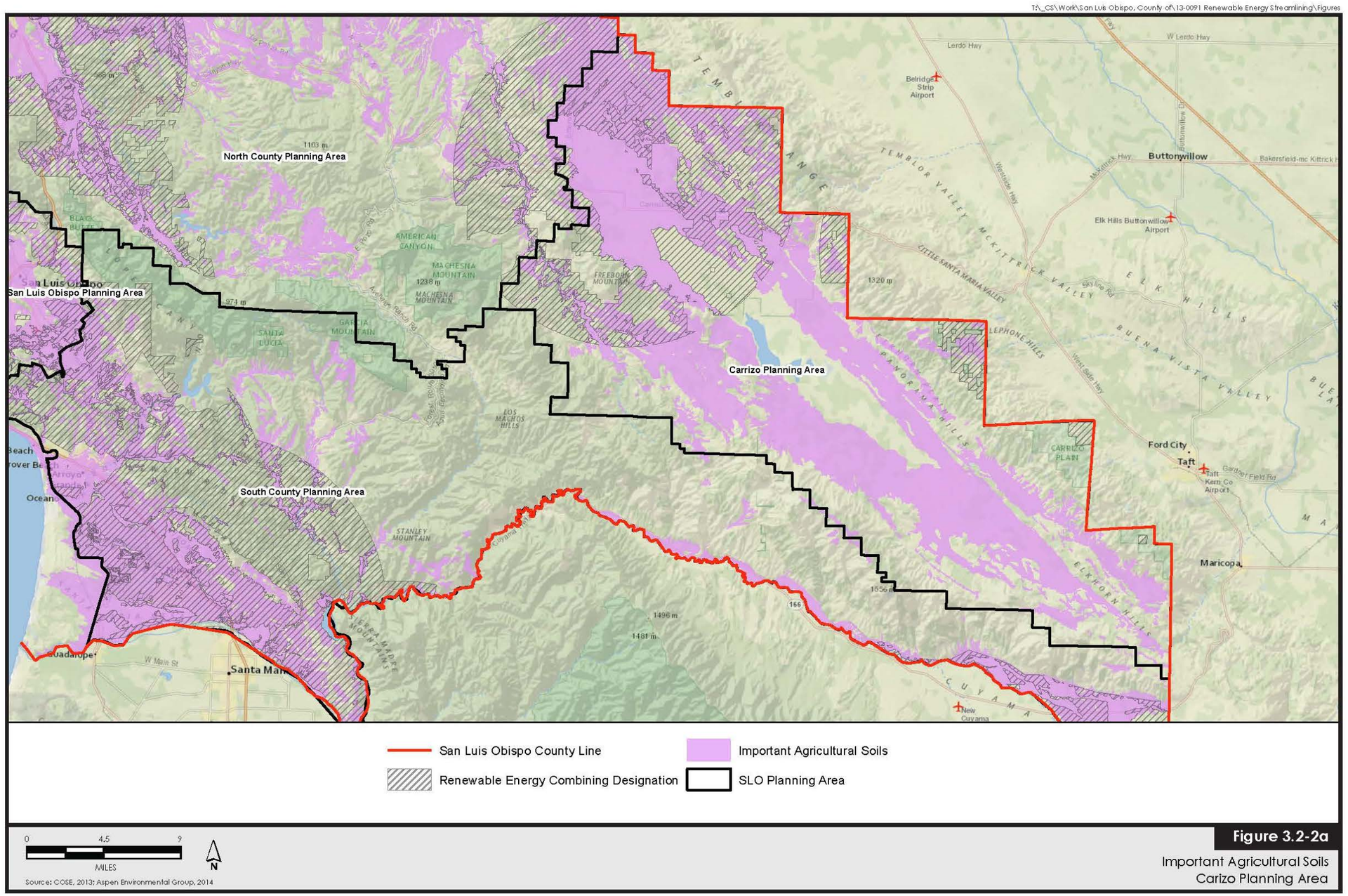


**Figure 3.2-2a**
Important Agricultural Soils
Carizo Planning Area

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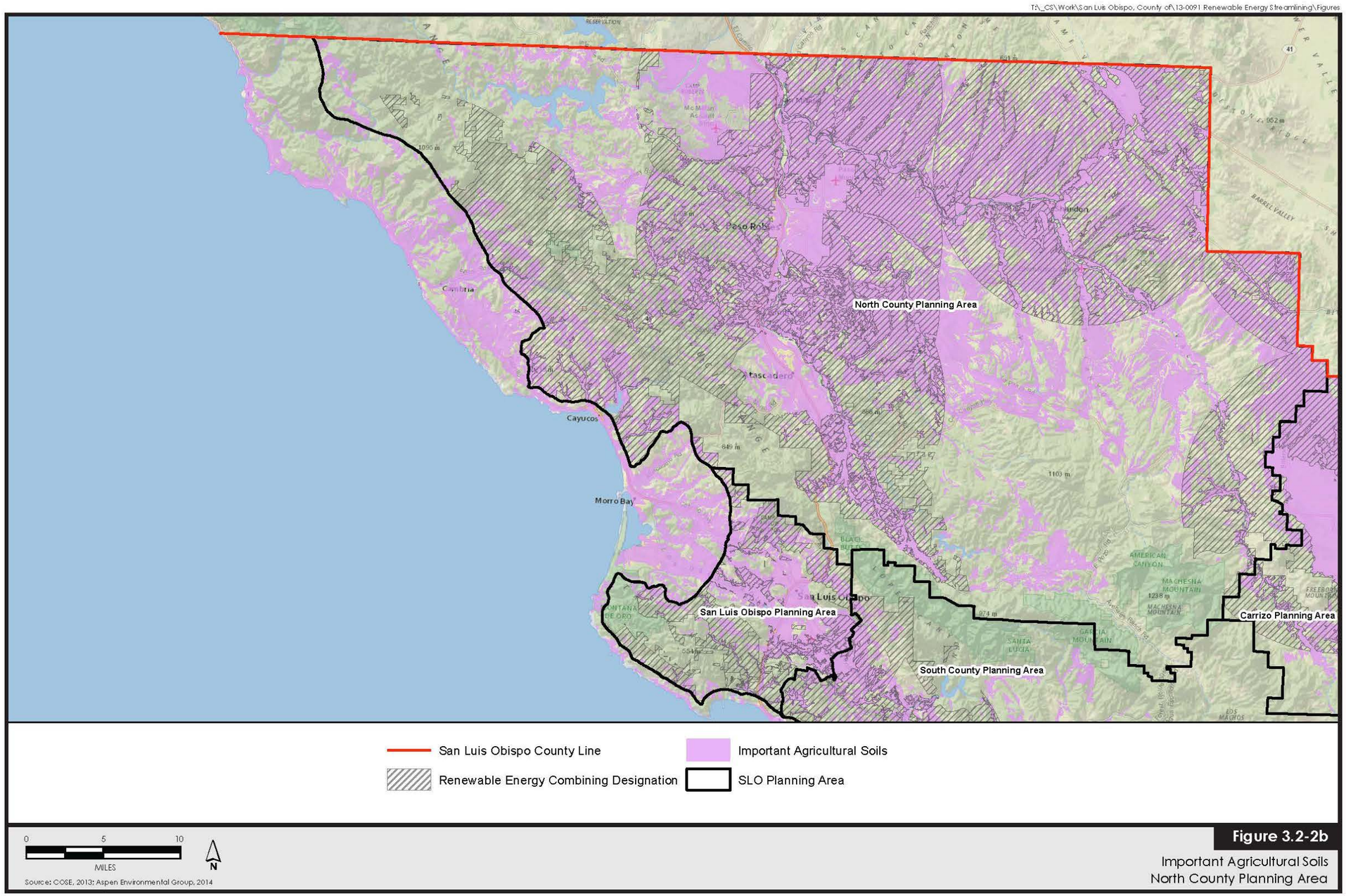


**Figure 3.2-2b**
Important Agricultural Soils
North County Planning Area

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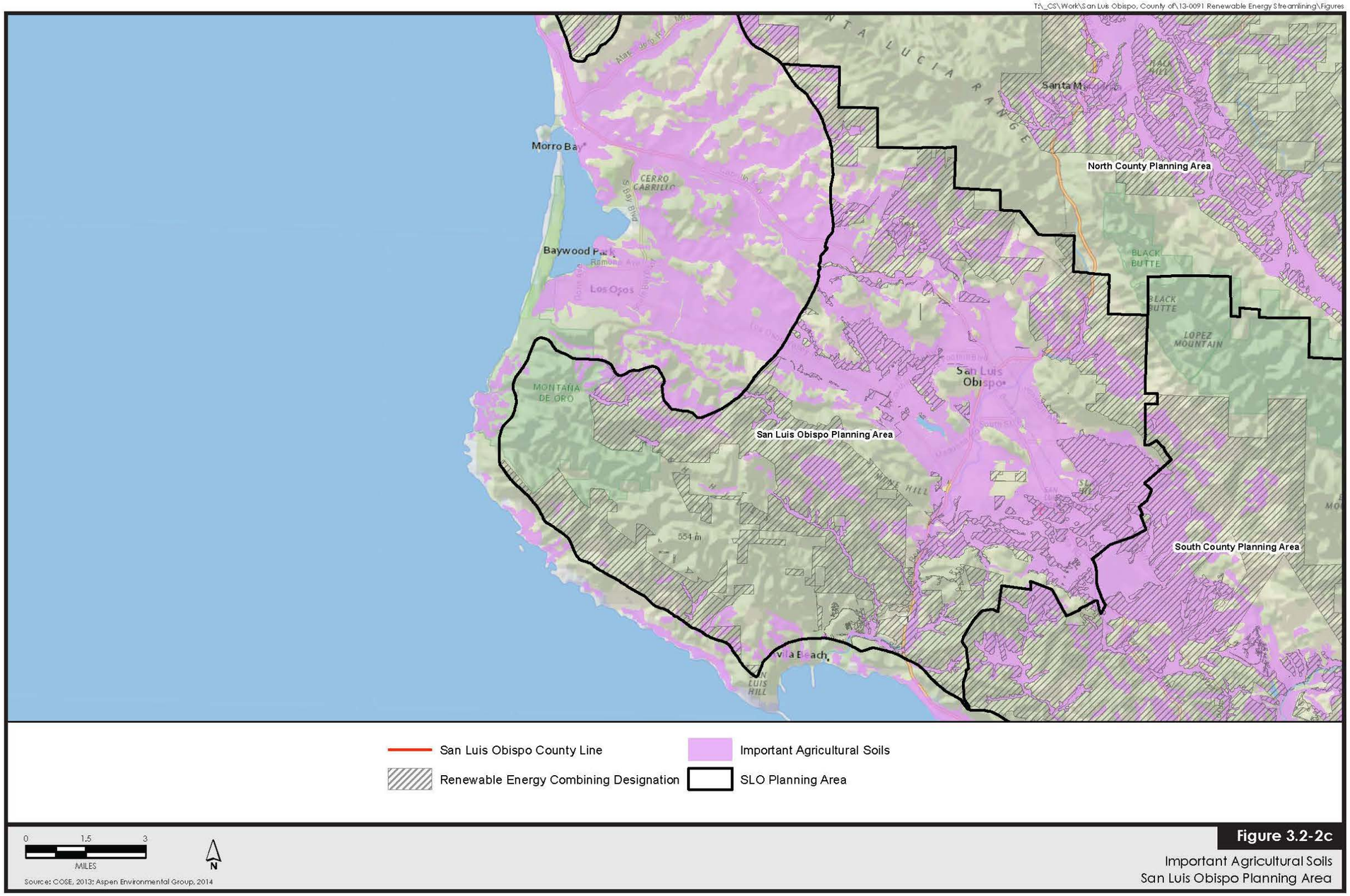


**Figure 3.2-2c**

Important Agricultural Soils
San Luis Obispo Planning Area

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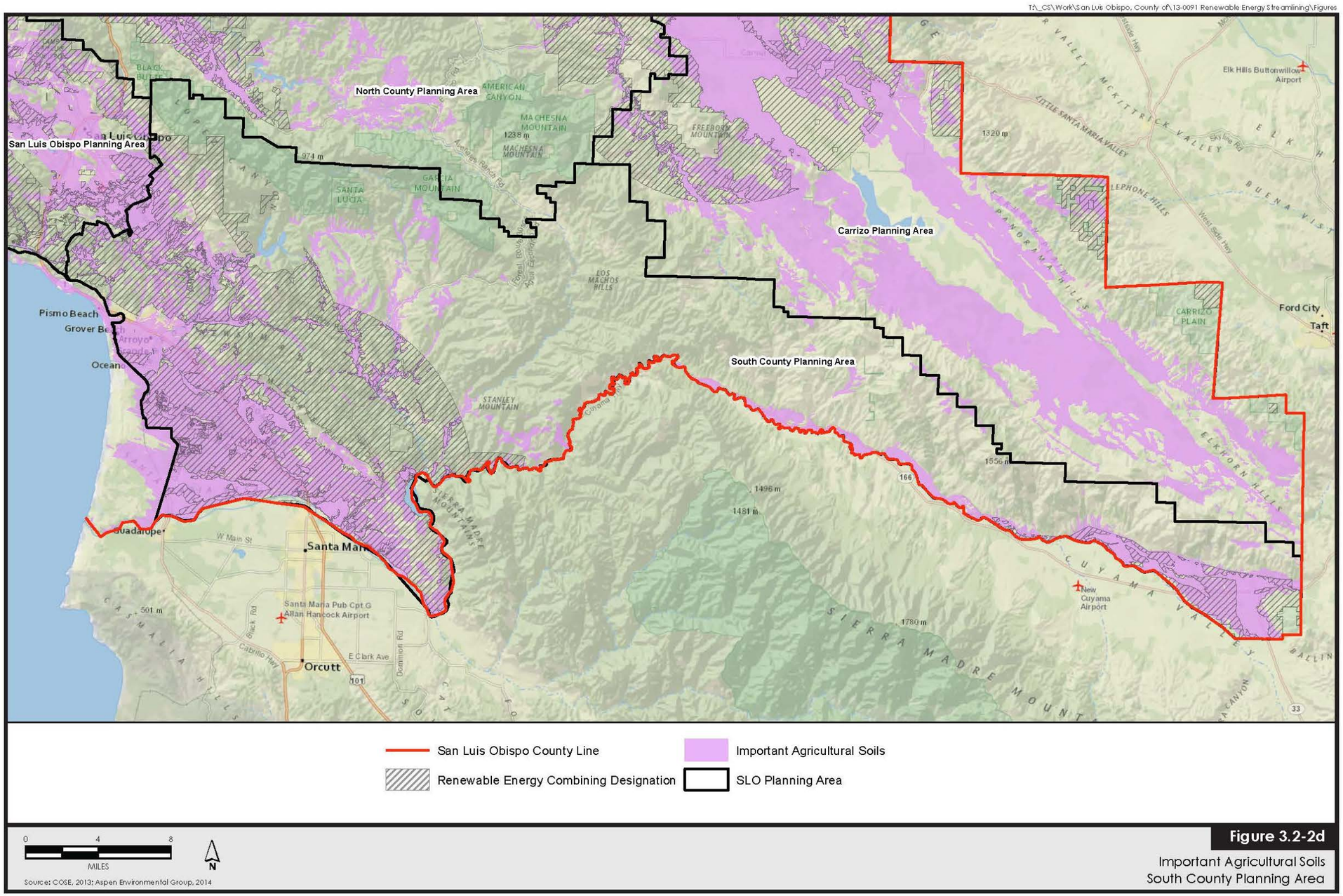


**Figure 3.2-2d**
Important Agricultural Soils
South County Planning Area

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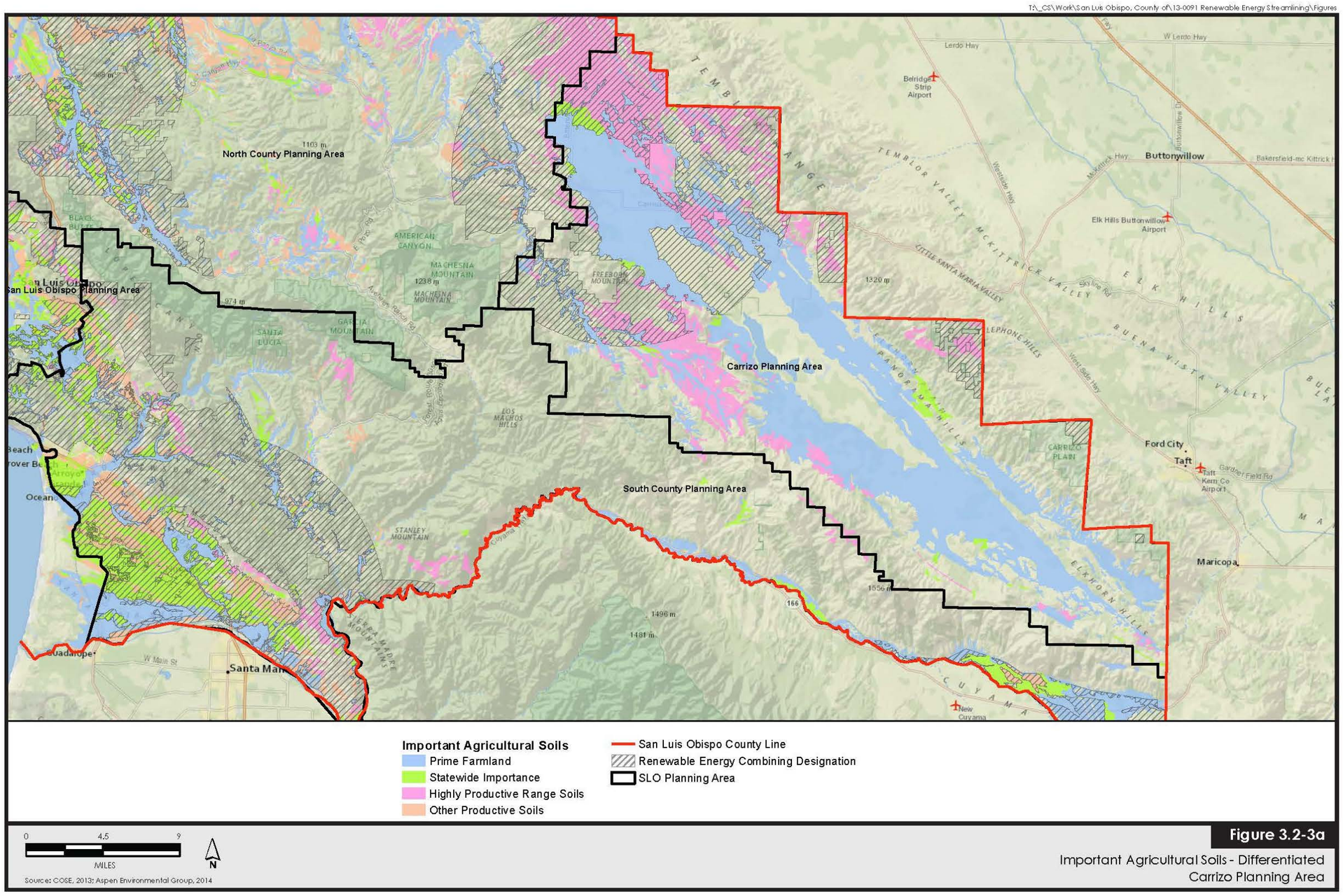


**Figure 3.2-3a**

Important Agricultural Soils - Differentiated
Carrizo Planning Area

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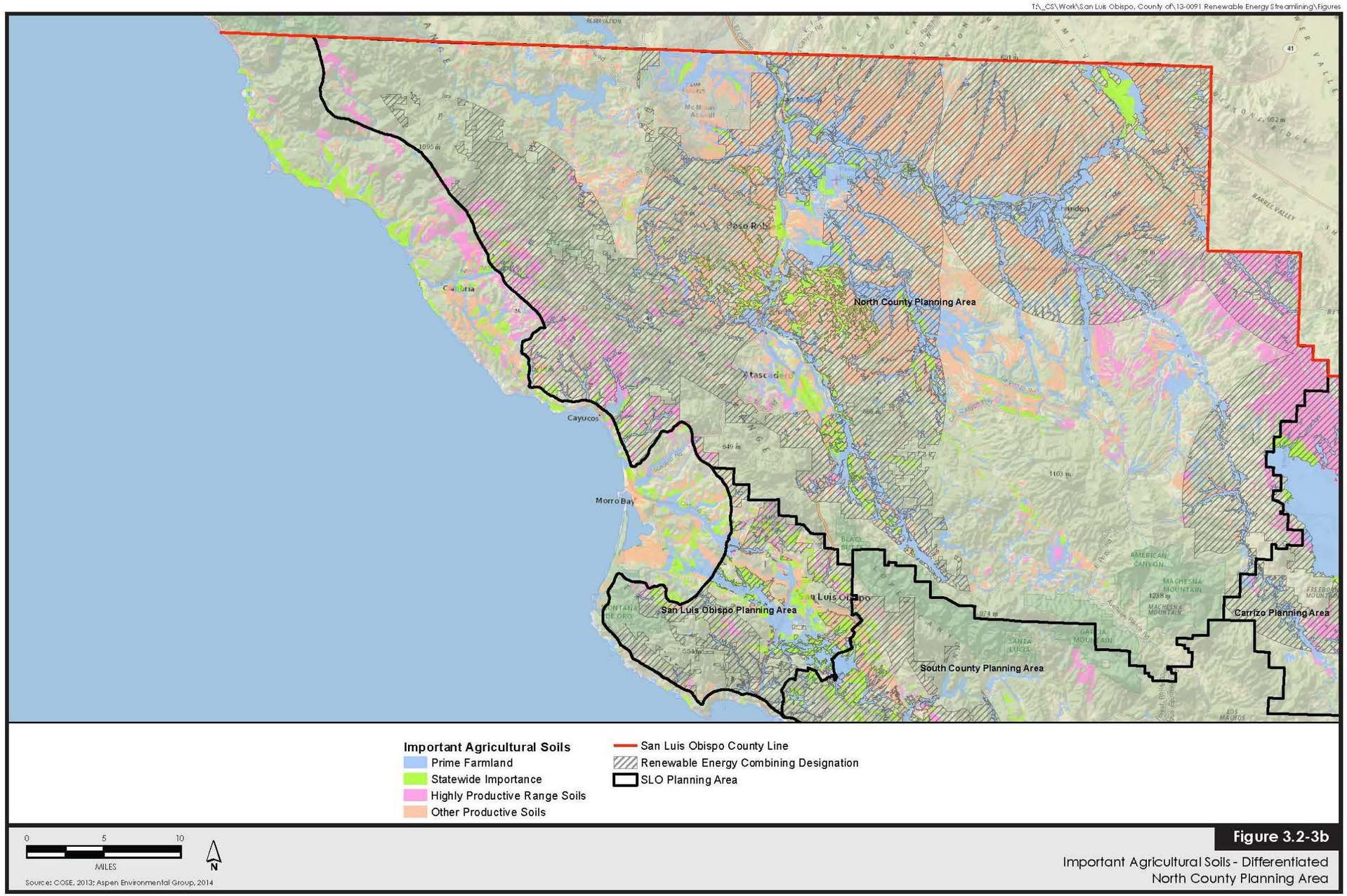


**Figure 3.2-3b**

Important Agricultural Soils - Differentiated
North County Planning Area

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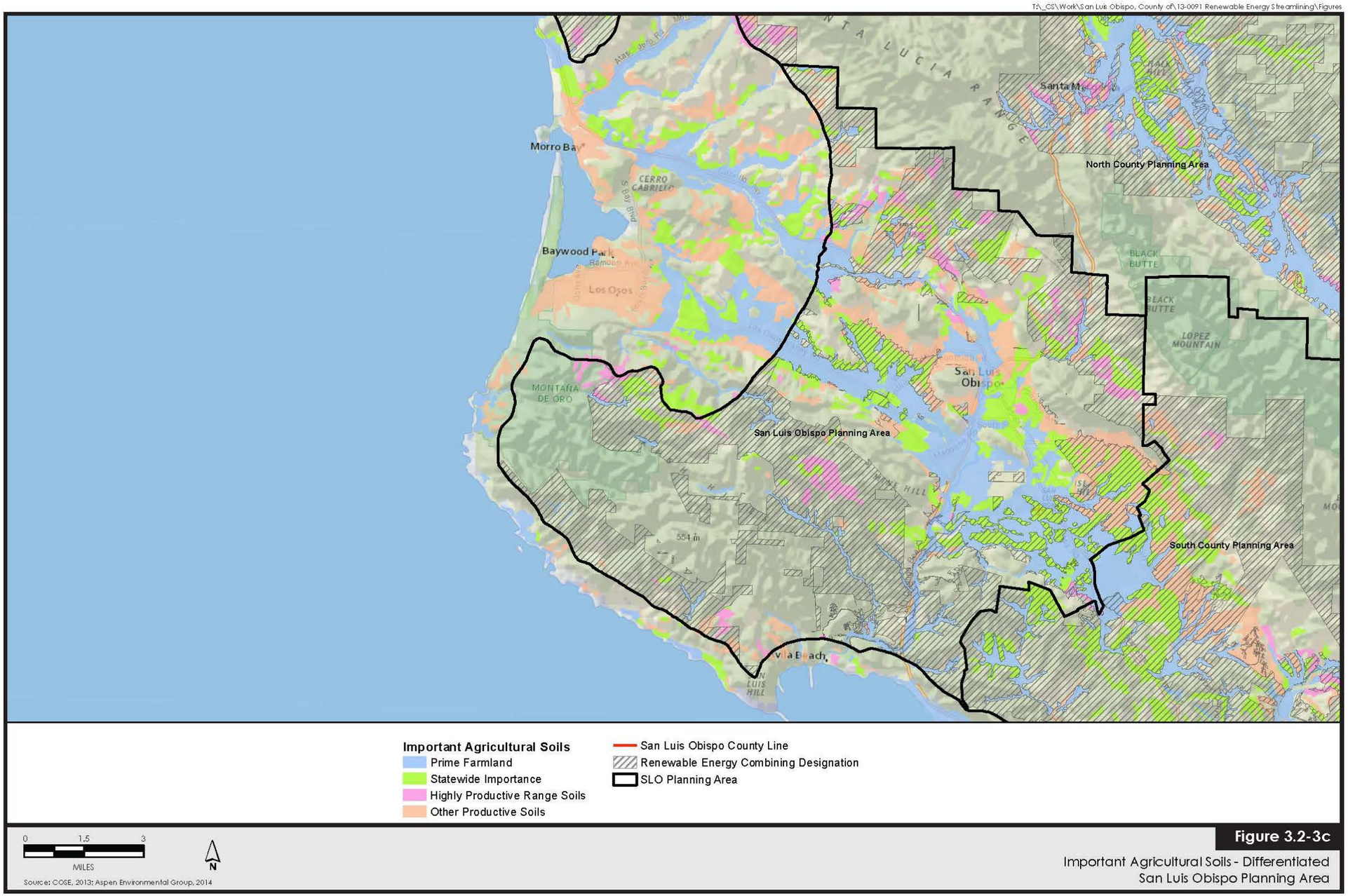


**Figure 3.2-3c**

Important Agricultural Soils - Differentiated
San Luis Obispo Planning Area

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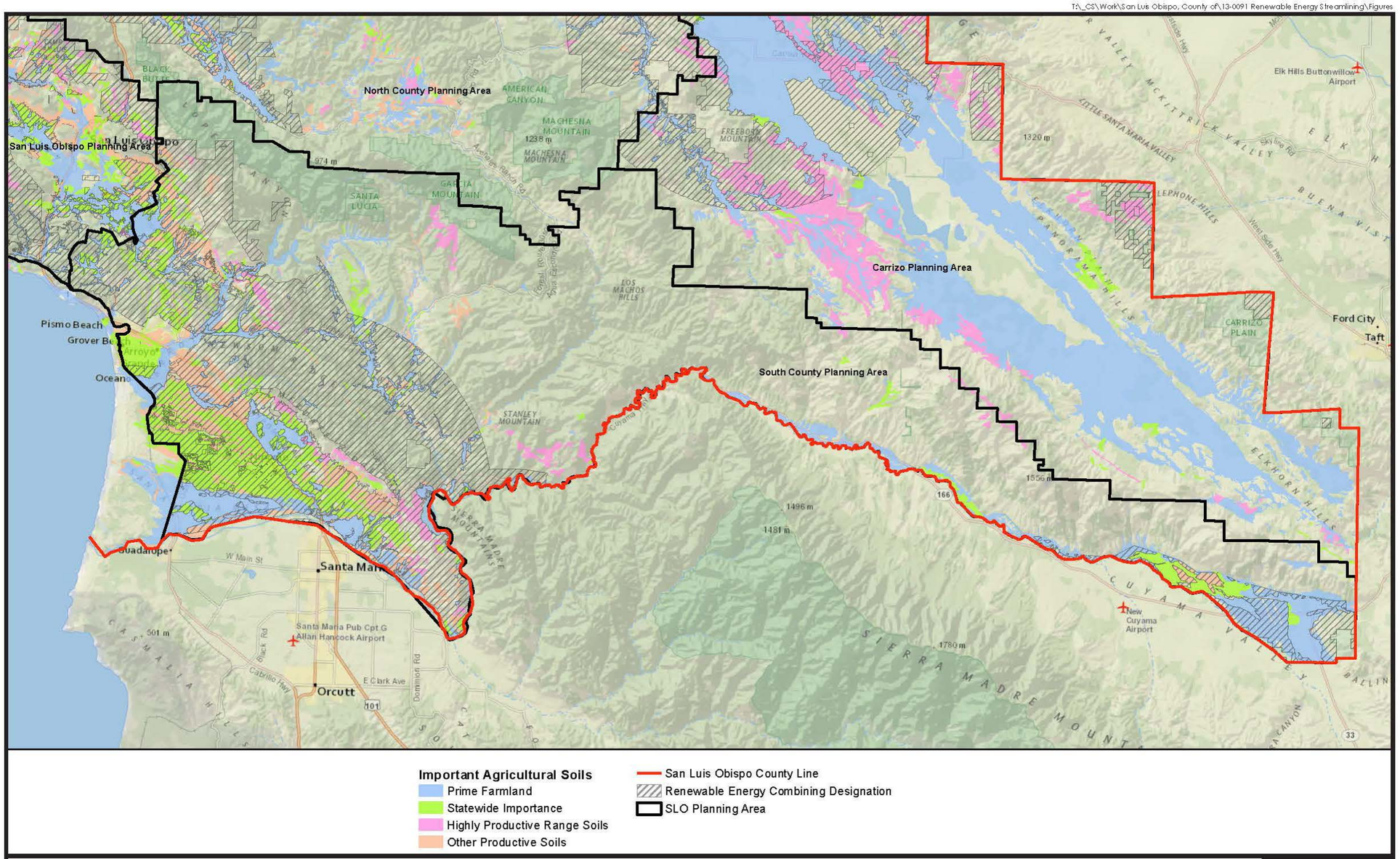


**Figure 3.2-3d**

Important Agricultural Soils - Differentiated
South County Planning Area

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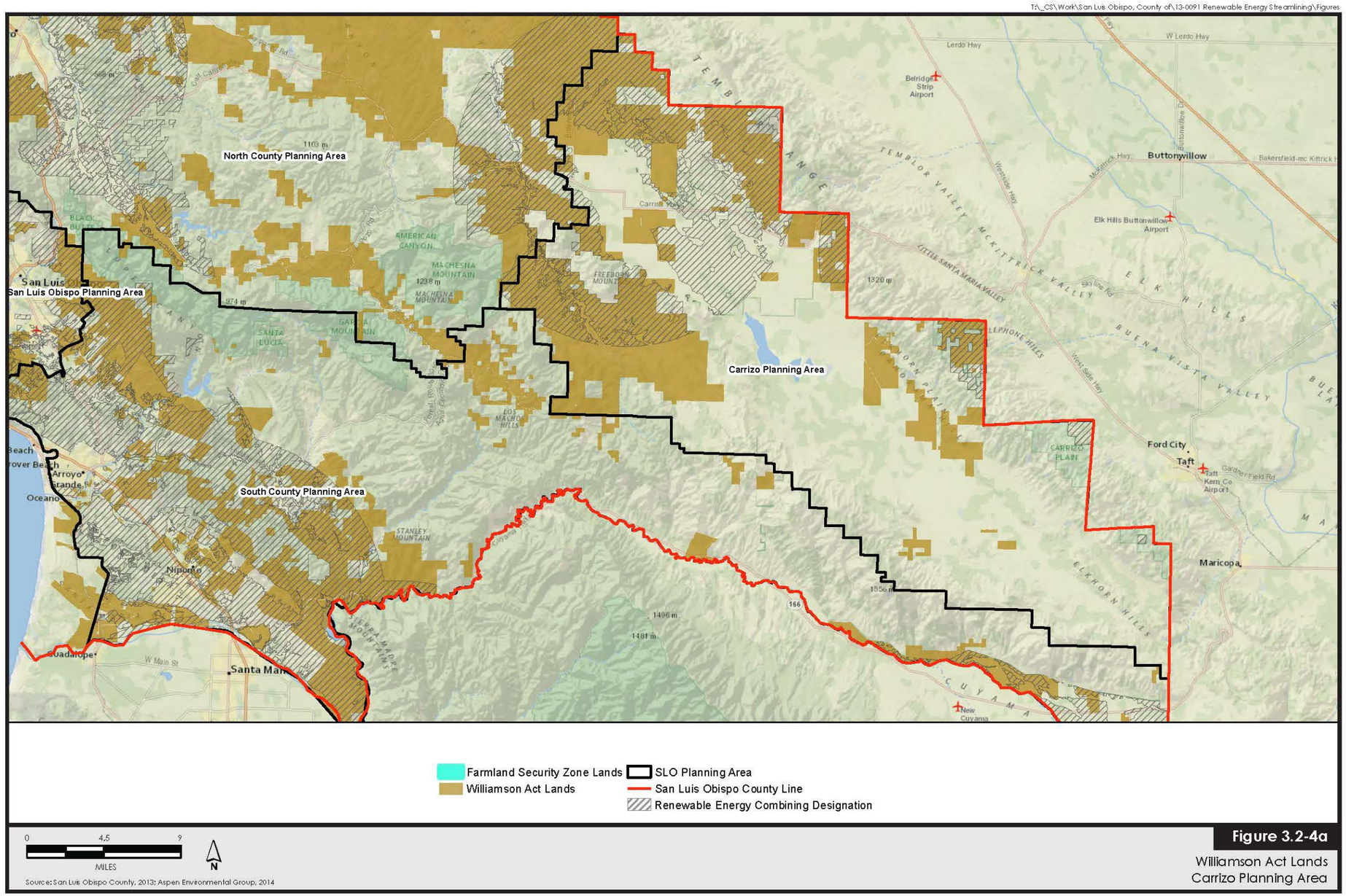


**Figure 3.2-4a**
Williamson Act Lands
Carrizo Planning Area

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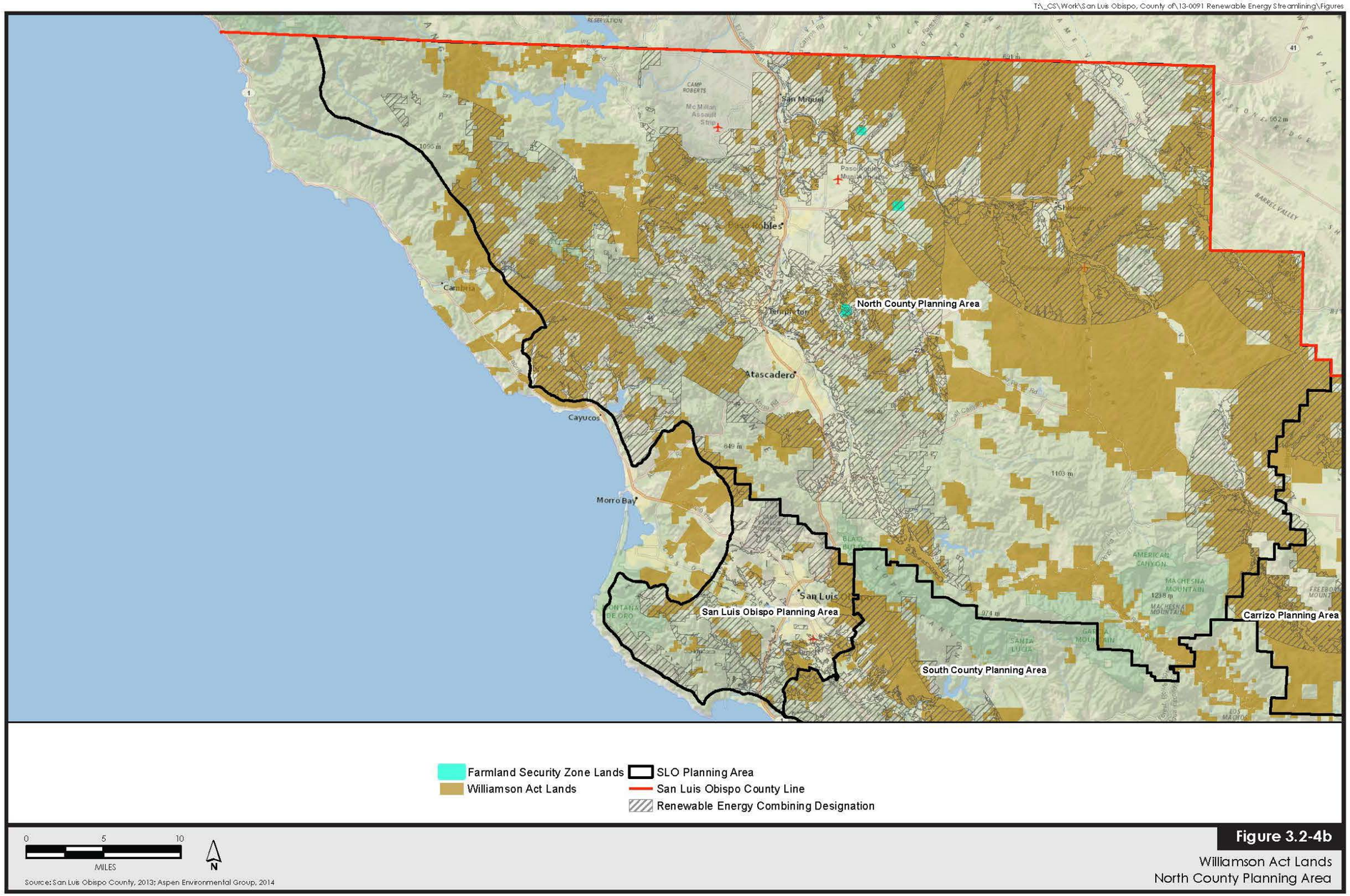


**Figure 3.2-4b**
Williamson Act Lands
North County Planning Area

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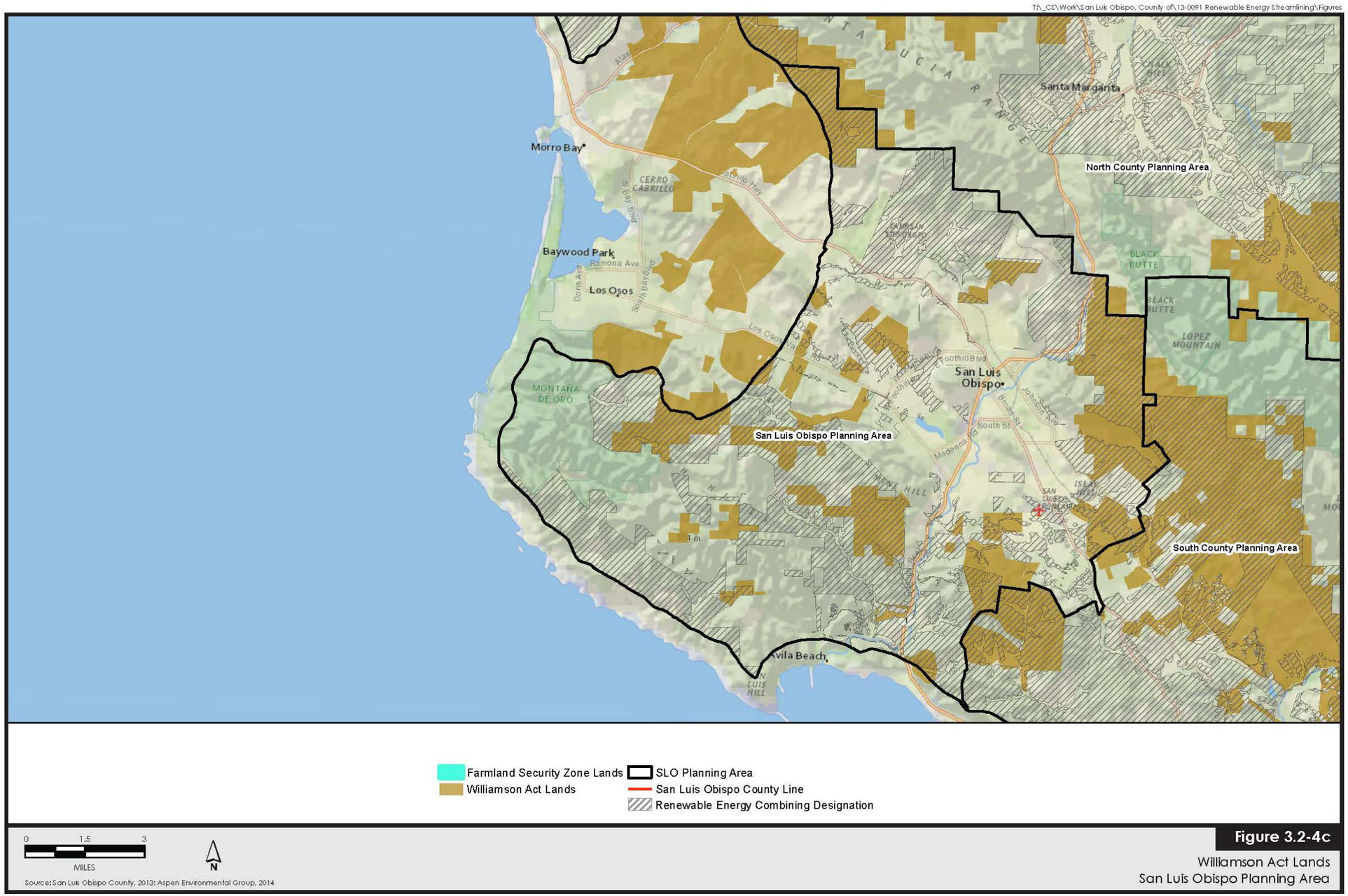


**Figure 3.2-4c**
Williamson Act Lands
San Luis Obispo Planning Area

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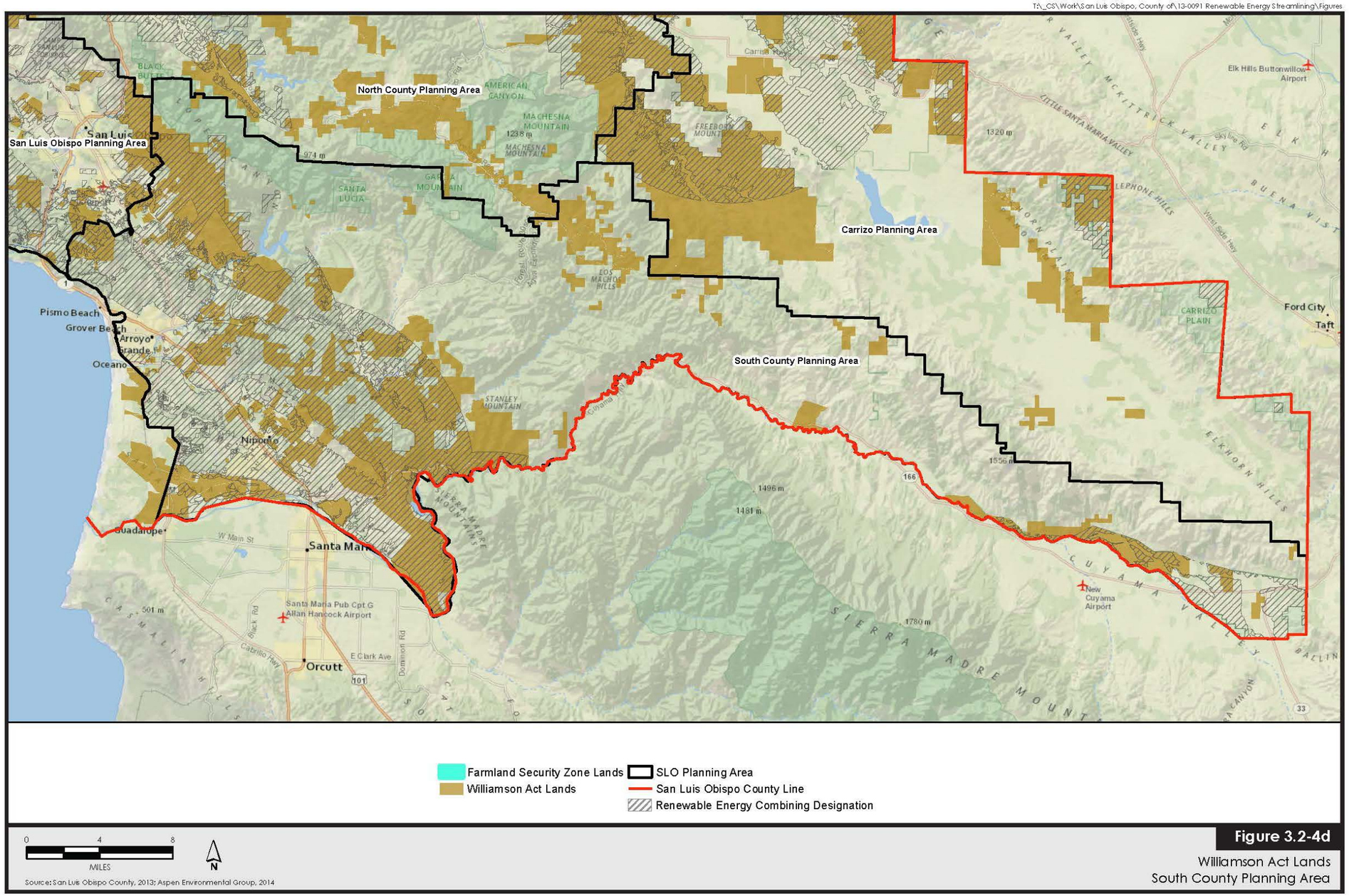


**Figure 3.2-4d**
Williamson Act Lands
South County Planning Area

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North County Planning Area

The North County Planning Area contains 737,944 acres of County-designated agricultural land, including 313,077 acres of Important Agricultural Soils and 490,319 acres enrolled in Williamson Act contracts. Agriculture has traditionally been and remains the principal industry in the North County Planning Area. Within urban areas, new development is increasingly oriented to commuter and retirement living, light industry, service businesses, and tourism. The planning area's deepest soils occur in older alluvial plains and existing floodplains. The highest quality agricultural soils exist in these areas (SLO County 2014a). The seven sub-areas in the North County Planning Area are described in more detail below.

**Adelaida Sub-Area**. Agriculture is the dominant land use in the Adelaida Sub-Area. The area contains relatively large parcels, large areas of land under Williamson Act contracts, and good soils, all of which reinforce widespread agricultural use. Almost the entire northern half of the sub-area, except Camp Roberts, is covered by Williamson Act contracts. Agricultural uses in the area include grazing, dry farming, orchards, vineyards, and such specialties as wineries and horse breeding. The area along the eastern slopes of the Santa Lucia Range is primarily rangeland, while farmlands in the north and east support extensive dry farm, orchard, and vineyard operations (SLO County 2014a).

**El Polmar-Estrella Sub-Area**. Historically, agriculture has been a primary land use in the El Pomar-Estrella Sub-Area. The El Pomar and Estrella agricultural preserves encompass much of the area. Of the 24,690 acres in the sub-area listed by the County Agricultural Commissioner's Office as producing some agricultural commodity in 2001, the largest segment by far (11,808 acres, or 48 percent) was devoted to cultivation of wine grapes. Hay was the next largest crop (2,665 acres). The average size of agricultural parcels north of State Route (SR) 46 is about 80 acres. South of SR 46, large agricultural holdings are interspersed between older subdivisions. The area near Paso Robles and the airport is experiencing intensification of agricultural uses, in particular vineyards (SLO County 2014a).

**Las Pilitas Sub-Area.** Some of the best quality soils in the Las Pilitas Sub-Area are found in the Santa Margarita Rancho lands in the southwest portion of the Las Pilitas Sub-Area along Pozo Road, much of which is an agricultural preserve. Substantial areas under Williamson Act contracts are used for dry farming, as in the Santa Margarita Rancho area, or for grazing, as in the area around Pozo. There are also existing agricultural operations found in the La Panza Road area north of Pozo, including a large turkey ranch. Agriculture designated lands are primarily in large ownership and must rely on locally available water resources for continued agricultural operations (SLO County 2014a).

**Los Padres North Sub-Area.** Agricultural lands in the Los Padres North Sub-Area are privately held and enrolled in Williamson Act contracts. These are mainly large cattle ranches with occasional residences or outbuildings. Limited dry farming exists where soil and terrain permit. Many ranches have obtained special Forest Service use permits allowing cattle grazing allotments on National Forest lands. These permits are reviewed periodically to ensure use of recommended range and grazing practices. Some ranches also control private access roads into portions of the Los Padres National Forest (SLO County 2014a).

**Nacimiento Sub-Area**. The majority of the Nacimiento Sub-Area along the western slopes of the Santa Lucia Mountains is designated by the County as Agriculture. The primary agricultural uses in the sub-area are grazing and dry farming. Most properties are in large holdings except in the area east of Bee Rock Road where smaller parcels of 40 acres are common. The agricultural practices in the sub-area require large acreages to be financially feasible (SLO County 2014a).

**Salinas River Sub-Area**. While this sub-area contains most of the urbanized areas in northern San Luis Obispo County, agriculture is still widespread in the Salinas River Sub-Area. Most agricultural uses adjacent to the Salinas River are particularly dependent on well irrigation water. Agriculture covers approximately 50,000 acres of the Salinas River Sub-Area, primarily in cattle grazing and dry farming. Irrigated agriculture covers only 3,800 acres; these irrigated soils support a variety of crops, including alfalfa, vineyards, orchards, pasture, and vegetables (SLO County 2014a).

**Shandon-Carrizo North Sub-Area.** Agriculture has been and still is the primary use of land in the Shandon-Carrizo Sub-Area; agriculture covers approximately 90 percent of the sub-area. The Estrella River Valley, the San Juan Creek Valley, and the area around Shandon Valley are generally used most intensively because of better soils and water availability. Irrigated production has increased during the last 10 years, particularly in vineyards and alfalfa. Dry farming and grazing operations encompass the rest of the agricultural uses. Much of the sub-area is in the agricultural preserve program, with parcel sizes ranging from 40 to 640 acres depending on production capability. Continued agricultural production is encouraged adjacent to the Shandon Urban Area. The soil capability of this area is Prime Farmland if irrigated, and most parcel sizes are sufficiently large to maintain a viable production (SLO County 2014a).

### San Luis Obispo Planning Area

The San Luis Obispo Planning Area contains 43,236 acres of County-designated agricultural land, including 24,921 acres of Important Agricultural Soils and 16,234 acres enrolled in Williamson Act contracts.

**San Luis Obispo North Sub-Area**. The geology, topography, and drainage patterns within the San Luis Obispo North Sub-Area have helped define the soils found here. In the valley bottoms, there are alluvial soil groups, dominated by the Cropley-Salinas soils in the Edna area and Salinas-Marimel soils around San Luis Obispo Creek. These soils are very deep, nearly level to moderately sloping, and mostly well-drained. The surface layer ranges from sandy loam to clay. The Cropley-Salinas soils are well suited for dryland farming and irrigated pasture, while the Salinas-Marimel soils are well suited for irrigated row crops. The Salinas and Marimel soils are well suited for wildlife habitat development. The major soil groups found in the hills and mountains include the Los Osos-Lodo-Diablo soils, Santa Lucia-Lopez-Rock outcrop soils, Nacimiento-Calodo soils, and Rock outcrop-Obispo-Henneke soils. These soils are shallow to deep, moderately sloping to extremely steep and generally well drained. The surface layer ranges from loam to clay. These soils are used mainly as rangeland, with limited areas suited for dryland farming (SLO County 2014a).

### South County Planning Area

The South County Planning Area contains 228,301 acres of County-designated agricultural land, including 68,246 acres of Important Agricultural Soils and 109,262 acres enrolled in Williamson Act contracts.

**Huasna-Lopez Sub-Area.** Agriculture is the principal land use in this sub-area, ranging from small irrigated farms to large cattle ranches. Valley lowlands, particularly in the Huasna drainage area, have soils and climate conducive to more intensive farm uses. Limited hilly areas with moderate slopes have the potential for tree and vine crops. A substantial portion of the sub-area consists of mountainous land with chaparral and oak woodlands, suitable only for limited grazing. About half the sub-area is enrolled in Williamson Act contracts (SLO County 2014a).

**Los Padres South Sub-Area.** Agricultural lands in the Los Padres South Sub-Area are privately held and enrolled in Williamson Act contracts. These are mainly large cattle ranches with occasional residences or outbuildings. Limited dry farming exists where soil and terrain permit. Many ranches have obtained special Forest Service use permits allowing cattle grazing allotments on national forest lands. These permits are reviewed periodically to ensure use of recommended range and grazing practices (SLO County 2014a).

**San Luis Obispo South Sub-Area.**. In the valley bottoms, alluvial soil groups typically are found, dominated by Cropley-Salinas soils in the Edna area and Salinas-Marimel soils around San Luis Obispo Creek. These soils are very deep, nearly level to moderately sloping, and mostly well drained. The surface layer ranges from sandy loam to clay. The Cropley-Salinas soils are well suited for dryland farming and irrigated pasture, while the Salinas-Marimel soils are well suited for irrigated row crops. The major soil groups found in the hills and mountains include Los Osos-Lodo-Diablo soils, Santa Lucia-Lopez-Rock outcrop soils, Nacimiento-Calodo soils, and Rock Outcrop-Obispo-Henneke soils. These soils are shallow to deep, moderately sloping to extremely steep, and generally well drained. The surface layer ranges from loam to clay. These soils are used mainly as rangeland, with limited areas suited for dryland farming. There are a wide variety of agricultural activities in the San Luis Obispo South Sub-Area. In the Edna Valley, recent expansion of intensive agricultural uses includes citrus and avocado groves and grape vineyards (SLO County 2014a).

**San Luis Bay Inland (South) Sub-Area.** Agriculture covers a substantial portion of this sub-area. Much of the agricultural land in this sub-area is enrolled in Williamson Act contracts, and rangeland dominates the Irish Hills and Indian Knob areas. There are relatively rich farmlands in the Cienega and Arroyo Grande valleys. The parcel sizes are generally large and lands are intensively used for raising crops. There are very few residences in the Cienega Valley; farmlands depend on the locally available groundwater (SLO County 2014a).

**Shandon-Carrizo South Sub-Area.** Most of this sub-area uses little water in dry farm and grazing operations, but the bottomland acreages suitable for irrigated crops are constrained by available water supplies. Consequently, the estimated safe annual yield of the underlying basins might be insufficient to irrigate all lands of otherwise suitable topography and soil (SLO County 2014a).

## 3.2.2 REGULATORY SETTING

### STATE

#### California Department of Conservation

The Department of Conservation (DOC) administers and supports a number of programs, including the Williamson Act, the California Farmland Conservancy Program, the Williamson Act Easement Exchange Program, and the Farmland Mapping and Monitoring Program. These programs are designed to preserve agricultural land and provide data on conversion of agricultural land to urban use. The Department of Conservation is responsible for approving Williamson Act Easement Exchange Program agreements.

#### Important Farmland Inventory System and Farmland Mapping and Monitoring Program

The USDA Natural Resources Conservation Service (NRCS, previously known as the Soil Conservation Service) initiated the Important Farmland Inventory System in 1975. This system classifies land based on ten soil and climatic characteristics. The State of California developed a

system based on this federal system, with the California Department of Conservation's development of a mapping and monitoring program for California in 1980, known as the Farmland Mapping and Monitoring Program (FMMP).

Under Appendix G of the California Environmental Quality Act (CEQA), the checklist references the FMMP to help evaluate agricultural resources in environmental assessments. The state's system was designed to document how much agricultural land in California was being converted to nonagricultural land or transferred into Williamson Act contracts. The definitions of Important Farmland types are provided in the Farmland Mapping and Monitoring Program discussion in Subsection 3.2.1, Physical Setting, above.

### Williamson Act

As described above, the Williamson Act is a voluntary state program administered by counties and cities to preserve agricultural land and discourage the premature conversion of agricultural land to urban uses. The act authorizes local governments and property owners to (voluntarily) enter into contracts to commit agricultural land to specified uses for 10 or more years. Once restricted, the land is valued for taxation based on its agricultural income rather than unrestricted market value, resulting in a lower tax rate for owners. In return, the owners guarantee that these properties remain under agricultural production for an initial 10-year period. Termination of a Williamson Act contract through the nonrenewal process is the preferred method to remove the enforceable restriction of the contract. Cancellation is another method to remove this restriction but is usually reserved for unusual "emergency" situations. In order to approve cancellation, a board or council must make specific findings based on substantial evidence that a cancellation is consistent with the purposes of the act or in the public interest.

### Farmland Security Zones

Farmland Security Zones (FSZs) are meant to protect participating Important Farmland from development pressure. An FSZ must be located within an agricultural preserve (area designated as eligible for a Williamson Act contract) and designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. The agricultural and open space lands enrolled in the program are protected for a minimum of a 20-year term under an FSZ and are offered an even greater property tax reduction than land under a Williamson Act contract.

## LOCAL

### San Luis Obispo County General Plan – Agriculture Element

The Agriculture Element (2010) of the General Plan focuses on the management and protection of agriculture. Policies seek to balance the need for other environmental resources while protecting agriculture. The element commits to buffer and protect agricultural land from conversion to nonagricultural uses. Sites with the Agriculture land use designation and other lands in production agriculture are subject to policies that guide the location of new structures and facilities to protect agriculture. Policies create agriculture clusters, which are implemented through standards in the Land Use Ordinance. The element's Appendix D includes the County's Right to Farm Ordinance, which includes additional protection measures for existing agriculture (also codified under Title 5 of the County Code).

### San Luis Obispo County General Plan – Conservation and Open Space Element

The Conservation and Open Space Element (2010) presents policies to protect agricultural soils from conversion to nonagricultural uses. This element also presents the map of Important Agricultural Soils protected by the County's soil and agricultural policies. Policies protect the County's Important Agricultural Soils, which account for both federal and state farmland classifications as described above.

### San Luis Obispo County General Plan – Land Use and Circulation Element

The Land Use and Circulation Element (LUCE) establishes policies for address strategic growth and the preservation of agriculture. Policies also commit to maintain rural areas with agriculture or low-density uses.

### San Luis Obispo County Land Use Ordinance – Title 22

The Land Use Ordinance (LUO) includes standards that apply to agricultural uses and land use designations. Site design standards establish maximum height and required setbacks for Agriculture land use designations. Chapter 22.30 establishes standards for specific agricultural uses, including agricultural accessory structures (Section 22.30.060), agricultural processing uses (Section 22.30.070), and crop production or grazing within urban or village areas (Section 22.30.200).

#### LUO – Planning and Permit Procedures

Article 6 of the LUO identifies permit requirements to document land use buffers for agriculture. Section 22.60.040 establishes that for all land use applications except zoning clearance for sites where there is an existing agricultural use taking place on adjacent parcels and a buffer is proposed, the buffer shall be identified and incorporated into project design.

### San Luis Obispo County Williamson Act Rules and Procedures

The County of San Luis Obispo administers the Williamson Act program locally for the unincorporated county. The County's Williamson Act Rules and Procedures regulate allowable uses for lands under conservation contract. Standards in the rules and procedures restrict the use of land for agricultural and compatible uses. Table 2 does not allow electric-generating plants on contracted land, while public utility facilities are allowable. The definitions of both land uses are located in Chapter 22.80 of the Land Use Ordinance. Electric-generating plants typically involve large-scale plants whose purpose is to produce electricity. Public utility facilities involve the distribution of voltage, power lines and transformers being prime examples.

In the current rules and procedures, Williamson Act lands may withdraw from a Williamson Act contract by filing a notice of nonrenewal. This process can be initiated by either the contracting agency or the landowner. Under this process, the contract is ended after a nine-year nonrenewal period during which taxes gradually increase every year.

The California Land Conservation Act of 1965 and the California Department of Conservation strongly discourage the cancellation of Williamson Act contracts. Cancellation can be a lengthy process and is intended for only unusual circumstances. If a cancellation request is tentatively approved by the Board of Supervisors, the applicant must pay a cancellation penalty fee (collected by the County and transmitted to the State) amounting to 12.5 percent of the

appraised value of the property as if it were not subject to contract within one year after tentative approval of cancellation.

Public acquisition of Williamson Act contracted lands is only available to public agencies acquiring land through eminent domain or voluntary donation or sale by private landowners to a public agency (acquisition in lieu of eminent domain). The acquisition process requires notification, a referral package with a detailed project description, and findings from the Government Code. Although land can be removed from land conservation contract upon conveyance to a public agency without having to "run the contract term," this process is generally not available to private landowners or to developers of renewable energy projects.

### San Luis Obispo County Right to Farm Ordinance – Title 5

San Luis Obispo County adopted a right-to-farm ordinance most recently updated in 2002 (Title 5 of the County Code; see also Appendix D of the County's Agricultural Element). The ordinance seeks to enhance and encourage agricultural operations while providing proper notification to residents regarding agricultural entities' right to farm. The ordinance requires disclosure to purchasers of residential property in the unincorporated area of the County's policy to protect agricultural operations. The ordinance establishes that no properly conducted agricultural operation that is operated consistent with accepted standards is to be considered a nuisance. Title 5 identifies the required contents for disclosure, including a summary of potential inconveniences or discomforts from agricultural operations, such as dust, pesticide use, and fertilizer use. Agricultural operations protected by the ordinance are those that are conducted for commercial purposes consistent with common practice and other criteria specified by the ordinance. Protected agricultural operations must also predate the affected use of the purchased property, have been in existence for more than three years, and have not been a nuisance at the time the agricultural operation began.

### Summary of Local Regulations and Policies

**Table 3.2-4** summarizes regulations and policies from the documents described above, including General Plan elements, County codes, and procedures for agriculture. Information is organized by planning area.

**TABLE 3.2-4**
**LOCAL POLICIES AND CODES FOR AGRICULTURE ISSUES**

| Applicable Policy or Code Section | Summary |
|---|---|
| **Countywide** | |
| Agriculture Element, AGP10 | Encourage water conservation through feasible and appropriate "best management practices." Emphasize efficient water application techniques; the use of properly designed irrigation systems; and the control of runoff from croplands, rangelands, and agricultural roads. |
| Agriculture Element, AGP8.a | Allow the development of compatible intensive agricultural facilities that support local agricultural production, processing, packing, and support industries. |
| Agriculture Element, AGP8.b | Locate new buildings, access roads, and structures so as to protect agricultural land. |
| Agriculture Element, Goal AG3.b | Maintain and protect agricultural lands from inappropriate conversion to nonagricultural uses. |

| Applicable Policy or Code Section | Summary |
|---|---|
| Agriculture Element, Policy AGP11.a | Maintain water resources for production agriculture, both in quality and quantity, so as to prevent the loss of agriculture due to competition for water with urban and suburban development. |
| Agriculture Element, Policy AGP11.b | Do not approve proposed General Plan amendments or rezonings that result in increased residential density or urban expansion if the subsequent development would adversely affect: (1) water supplies and quality, or (2) groundwater recharge capability needed for agricultural use. |
| Agriculture Element, Policy AGP12.b | Encourage the use of integrated pest management techniques to manage pests, vertebrates, and weeds on both public and private lands. |
| Agriculture Element, Policy AGP12.c | Support and promote programs that help landowners learn pest control methods, utilizing the expertise of the UC Cooperative Extension and the County Agriculture Department. |
| Agriculture Element, Policy AGP17 | Protect land designated Agriculture and other lands in production agriculture by using natural or man-made buffers where adjacent to nonagricultural land uses using adopted agricultural buffer policies. |
| Agriculture Element, Policy AGP18 | Locate new buildings, access roads, and structures so as to protect agricultural land. |
| Agriculture Element, Policy AGP24 | Discourage the conversion of agricultural lands to nonagricultural uses. |
| Agriculture Element, Policy AGP24.a.4 | Discourage the conversion of agricultural lands to nonagricultural uses by avoiding locating new public facilities outside urban and village reserve lines unless they serve a rural function or there is no feasible alternative location within the urban and village reserve lines. |
| Agriculture Element, Policy AGP25 | For new development requiring a discretionary permit on AG land use designations or land used for production agriculture: Protect unique or sensitive habitat affected by the proposal through siting the proposed development so as to avoid significant impacts on the habitat or significant impacts on the agricultural operations. |
| Agriculture Element, Policy AGP27.a | Designation and management of a proposed Natural Area Preserve shall not interfere with agricultural uses on private lands that are either within or adjacent to the proposed preserve. |
| Agriculture Element, Policy AGP28.a | Designation and management of a Major Ecosystem shall not interfere with agricultural uses on private lands that are either within or adjacent to the Major Ecosystem. |
| Agriculture Element, Policy AGP29.a | Identification or designation of a wildlife corridor in accordance with the Biological Resources chapter of the Conservation and Open Space Element shall not interfere with agricultural uses on private lands. |
| Agriculture Element, Policy AGP30.b | In designated scenic corridors, new development requiring a discretionary permit shall address protection of scenic vistas by balancing the protection of scenic resources with protection of agricultural resources and facilities, siting structures, or grading to minimize visibility and compatibility with agricultural operations. |
| Agriculture Element, Policy SL 3.1 | Conserve Important Agricultural Soils. Proposed conversion of agricultural lands to nonagricultural uses shall be evaluated against the applicable policies in the COSE and in the Agriculture Element. |
| Agriculture Element, Appendix D | Right to Farm Ordinance (codified under Title 5 of the County Code). |
| General Plan, Conservation and Open Space Element, Policy AG2.b | Conserve the soil and water that are the vital components necessary for a successful agricultural industry in this county. |

| Applicable Policy or Code Section | Summary |
|---|---|
| Land Use and Circulation Element, Part I, Framework for Planning, Strategic Growth Principle 1 | Preserve open space, scenic natural beauty and sensitive environmental areas. Conserve energy resources. Conserve agricultural resources and protect agricultural land. |
| Land Use and Circulation Element, Part I, Framework for Planning, Strategic Growth Principle 1, Policy 6 | Encourage the protection and use of agricultural land for the production of food, fiber and other agricultural commodities, and support the rural economy and locally based commercial agriculture. |
| Land Use and Circulation Element, Part I, Framework for Planning, Strategic Growth Principle 2, Policy 1 | Maintain rural areas in agriculture, low-intensity recreation, very low-density residential uses, and open space uses that preserve and enhance a well-defined rural character. |
| Title 22, Section 22.60.040 | All land uses except zoning clearance: Where there is an existing agricultural use taking place on adjacent parcels and the applicant proposes an agricultural buffer, the buffer shall be shown on site plan, and incorporated into the site design or the lot configuration of the proposed land division. |
| Title 5, Williamson Act Rules of Procedure, Table 2 | Land under Williamson Act conservation contract: allowable uses limited to agriculture and compatible uses (Right to Farm Ordinance). |
| **Carrizo Planning Area** | |
| No additional policies or code specific to the Carrizo Planning Area. | |
| **North County Planning Area** | |
| Land Use and Circulation Element, Part II, North County Area Plan, Section III, 4.4, Policies | El Pomar-Estrella Sub-Area: Preserve agricultural operations by directing new development toward existing communities and subdivisions and away from agricultural uses, requiring new development to mitigate its impacts on existing agricultural operations, and supporting and maintaining the County Right-to-Farm Ordinance. |
| Land Use and Circulation Element, Part II, North County Area Plan, Section III, 4.4, Policies | El Pomar-Estrella Sub-Area: Protect the area near Paso Robles and the airport for agricultural use, and avoid any land use category changes that would diminish its agricultural potential and introduce nonagricultural uses in the area. |
| LUCE, Part III, Shandon Community Plan, Appendix D EIR Mitigation Measures, AG-1 (b) | Agriculture (AG) land use designations, Shandon Community Plan area: Applicants for projects on prime agricultural lands shall provide easements to conserve ag land at a ratio of 1:1 for direct impacts and 0.5:1 for indirect impacts, with funds to compensate for administrative costs incurred by easement holder. |
| Title 22, Article 9, 22.94.042.A | Agriculture (AG) land use designation, El Pomar-Estrella area: New development subject to discretionary review shall be set back a minimum of 50 feet from the top of the bank of any watercourse or outside the dripline of riparian vegetation, whichever distance is greater. |
| Title 22, Article 9, 22.94.080.C-F | Salinas River Sub-Area: All new development shall seek to preserve open space, the Salina River floodplain integrity, prime agricultural soils, and other land of agricultural value. |
| **San Luis Obispo Planning Area** | |
| Title 22, Article 9, 22.96.040.D | Production agricultural areas. New development shall place buildings to minimize the loss of existing and potential production agricultural areas including prime soils and other areas capable of agricultural production which primarily consist of Class III and IV soils, but may also include productive areas with Class VI soils. |
| **South County Planning Area** | |
| No additional policies or code specific to the South County Area. | |

### 3.2.3 IMPACTS AND MITIGATION MEASURES

#### THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines and the County's Environmental Checklist, a project will normally have a significant effect on agricultural resources if it will:

1) Convert prime agricultural land to a nonagricultural use. [This includes the conversion of Important Farmland as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency or the conversion of lands identified as Important Agricultural Soils of San Luis Obispo County.]

2) Conflict with existing zoning for agricultural use, or a Williamson Act contract.

3) Involve other changes in the existing environment, which due to their location or nature, could impair agricultural uses of other properties or could result in conversion of farmland to nonagricultural use.

Therefore, for the purposes of this project, any project activity resulting in an impedance of agricultural activities or potentially resulting in a substantial loss of agricultural productivity will be considered a potentially significant impact.

#### PROJECT IMPACTS AND MITIGATION MEASURES

**Convert Important Agricultural Soils to Nonagricultural Use (Threshold 1)**

Assessing impacts to agricultural resources involves examining both the environmental characteristics of those resources and their current and historic use. The strictly environmental components of agricultural resources include physical characteristics such as soil quality, as well as water quality and availability. The current and historic use of agricultural resources on a project site involves the interaction of these environmental characteristics with economic factors. The County defines Important Agricultural Soils in its COSE as described in Subsection 3.2.1, Physical Setting, above. Conversion of land that is used to grow high-value crops would have greater economic effects than conversion of land that is used for lower value crops or grazing, particularly because cultivation of higher-value crops tends to be more labor-intensive. However, this analysis is largely based on the quality of agricultural soils because CEQA generally focuses on physical, rather than economic, impacts.

The Renewable Energy (RE) Combining Designation allows renewable energy development on some agricultural land, but not on any designated Important Agricultural Soils except for Important Rangeland Soils.

Ground-mounted renewable energy systems and facilities may require grading and/or vegetation removal during construction and installation, which may affect agricultural land through increased erosion and loss of soil. Typical impacts on agricultural land include damage to crops and livestock from increased traffic on farm roads; competition for water resources, including groundwater; water and soil contamination; suppression of plant growth by fugitive dust; soil erosion; the spread of weeds; and shading of crops.

Solar electric facility (SEF) and wind energy conversion system (WECS) projects installed on rooftops and other structures would require very limited ground disturbance, if any.

**Impact 3-2-1 – Solar** Implementation of the proposed Program could convert Important Agricultural Soils to nonagricultural use. This impact is considered **significant, unavoidable, and adverse (Class I).**

The proposed project could lead to development of 150 megawatts (MW) of renewable energy and affect up to 1,500 acres of Important Agricultural Soils, representing approximately 0.20 percent of all Important Agricultural Soils in the county (see **Table 3.2-2**). The combining designation is approximately 801,910 acres in size with approximately 318,340 acres of Important Agricultural Soils. If the estimated 1,500 acres of project were to occur solely within the combining designation, it represents 0.47 percent of the Important Agricultural Soils as shown in **Table 3.2-2**.

The proposed Program could indirectly result in the conversion of agricultural land to nonagricultural uses. **Table 3.2-4** and **Table 3.2-5** lists the project categories and corresponding review level both within (Table 3.2-4) and outside (Table 3.2-5) of the RE Combining Designation. This EIR focuses on project categories that would be approved with either a zoning clearance or site plan review, as other project types would be subject to discretionary review and CEQA compliance, similar to existing practices.

**TABLE 3.2-5**
**APPROVAL LEVEL AND REQUIREMENTS WITHIN THE COMBINING DESIGNATION**

| Tier | Approval | Requirements |
|---|---|---|
| Tier 1 SEF roof- or structure-mounted | Zoning Clearance | • Located on the roof or structure of a conforming use. |
| Tier 1 SEF ground-mounted, 20 acres or less, and not on Class I or II soils | Site Plan Review | • Located on land that is graded, disturbed, or altered; or<br>• Located on land that was previously developed for industrial or commercial purposes and degraded or contaminated and then abandoned or underused. |
| Tier 1 WECS roof- or structure-mounted where allowable | Zoning Clearance | |
| Tier 2 SEF 40 acres or less | Site Plan | • Proposed on a parcel with land use category other than Open Space (OS) or Recreation (REC); and<br>• Is not subject to any environmentally related permits; and<br>• In the Agriculture (AG) land use category, is not sited on any type of Important Agricultural Soils as defined in the Conservation and Open Space Element, unless sited on Important Agricultural Soils designated as Highly Productive Rangeland. |
| Tier 3 SEF 160 acres or less | Site Plan | • Proposed on a parcel included in the Commercial Service (CS), Industrial (IND), or Agriculture (AG) land use categories (vacant or non-vacant).<br>• Is not subject to any environmentally related permits.<br>• In the Agriculture land use category, is not sited on any type of Important Agricultural Soils as defined in the Conservation and Open Space Element, unless sited on Important Agricultural Soils designated as Highly Productive Rangeland Soils. |

**TABLE 3.2-6**
**APPROVAL LEVEL AND REQUIREMENTS OUTSIDE OF THE COMBINING DESIGNATION**

| Permit Type | Tier | Requirements Outside of the Combining Designation |
|---|---|---|
| Zoning Clearance | Tier 1 roof- or structure-mounted | • Located on the roof or structure of a conforming use. |
| Zoning Clearance | Tier 1 WECS roof- or structure-mounted where allowable | |
| Minor Use Permit | Tier 2 SEF 40 acres or less | • Is not located on Class I or Class II soils,<br>• Is ground-mounted, and<br>• Is located in urban areas, or located in rural areas on sites designated as Commercial, Service (CS) or Industrial (IND)..<br>• CEQA analysis required of this discretionary permit. |
| Minor Use Permit | Tier 2 WECS ground-mounted | • Up to 100 feet tall; and<br>• No more than rated capacity of 2 MW for all turbines.<br>• CEQA analysis required of this discretionary permit. |
| Conditional Use Permit | Tier 3 SEF 160 acres or less | • CEQA analysis required of this discretionary permit. |
| Conditional Use Permit | Tier 4 SEF 160+ acres | • CEQA analysis required of this discretionary permit. |
| Conditional Use Permit | Tier 3 WECS ground-mounted | • CEQA analysis required of this discretionary permit. |

As shown in the above tables and codified in section 22.32.050.A of the proposed performance standards, Tier 1 ground-mounted SEFs could be allowed on previously disturbed land with ministerial approvals. As disturbed soils can also be Important Agricultural Soils, it is possible that Tier 1 projects will convert Important Agricultural Soils to nonagricultural uses. For Tier 2 SEF ground-mounted projects, the proposed performance standards require avoiding Class I and Class II Soils. Additionally, proposed performance standard section 22.32.050.D.9 requires agricultural easements to offset the conversion of Important Agricultural Soils for Tier 2 and above projects outside of the combining designation. Proposed performance standards in 22.14.100.E.2-3 for Tier 2 and Tier 3 SEF ground-mounted projects in the combining designation require avoiding Important Agricultural Soils, unless sited on Highly Productive Rangeland Soils. Agricultural easements proposed in 22.14.100.F.9 would further require agricultural easements to offset the conversion of Highly Productive Rangeland Soils and agricultural uses.

While this conservation easement measure could be similarly applied to Tier 1 ground-mounted SEFs proposed on Important Agricultural Soils, such mitigation would run counter to the primary objectives of the Program. The County is seeking to encourage development of these smaller scale (20 acres *or less*) Tier 1 SEFs by removing barriers to approval. Requiring conservation easements for SEFs that are 20 acres or less in size would place additional financial and legal burden on agricultural land owners, essentially discouraging applications and defeating streamlining efforts. Therefore, this measure was rejected as a performance standard for Tier 1 SEFs, and as a result this impact is considered **significant, unavoidable, and adverse (Class I)**.

**Impact 3-2-1 – Wind**

Implementation of the proposed Program could convert Important Agricultural Soils to nonagricultural use. This impact would be **less than significant (Class III)**.

Tier 1 WECS must be roof or structure-mounted and would not convert Important Agricultural Soils to nonagricultural use. Therefore, this impact would **less than significant (Class III)**.

Tier 2 WECS projects are subject to the same ground disturbance provisions as Tier 2 SEF projects as discussed in Impact 3-2-1 Solar above; however, impacts are likely to be less than for SEF projects. Wind turbines typically occupy a much smaller footprint on the ground than a similarly sized SEF project and can be located so as to minimize impacts to Important Agricultural Soils.

Also, other than the actual footprint of the tower, it is possible to continue farming around the WECS equipment. Tier 2 WECS projects are also subject to discretionary approval through a Minor or Conditional Use Permit (see **Table 3.2-5**); site-specific provisions regarding conversion of Important Agricultural Soils may apply. As WECS projects occupy much less land area than a similarly sized SEF project, can be located so as to avoid Important Agricultural Soils, and can allow farming around the installation, this impact is considered **less than significant (Class III)**.

**Impact 3-2-1 – Policy Changes** Implementation of the proposed Program could result in changes to countywide policies that could indirectly result in the conversion of Important Agricultural Soils to nonagricultural use. This impact is considered **significant, unavoidable, and adverse (Class I).**

The proposed policy would streamline the installation of renewable energy projects in the combining designation and for Tier 1 projects in other areas of the county. The policy changes include modifications that are mainly focused on changes to the Land Use Ordinance (LUO) to explain and permit the streamlining. Recommended performance standards are included in Section LUO 22.14; however, the policy changes also modify the COSE to help define the type and scale of energy generation facilities, the LUCE to create a renewable energy area and support streamlining, and modifications to the Rules of Procedure (RoP) for implementation of the California Land Conservation Act. These policy changes resulted in the proposed modifications to the LUO discussed in this EIR.

The proposed changes to County policies would streamline approval of renewable energy solar electric and wind powered facilities that could result in the conversion of up to 1,500 acres of Important Agricultural Soils to nonagricultural use for an extended period (25+ years). The proposed LUO requires that projects comply with performance standards designed to address environmental impacts, including impacts to agricultural resources.

For Tier 2 and above projects, either the provision of the proposed performance standards requiring an easement or the avoidance of Important Agricultural Soils, or the resulting conditions placed on a project through specific evaluation associated with the Minor or Conditional Use Permit will reduce impacts to less than significant levels. However, as discussed in Impact 3-2-1 Solar, not all of the proposed performance standards are appropriate for all projects. Tier 1 SEF projects may result in the conversion of Important Agricultural Soils to nonagricultural uses, as application of an agricultural easement is not considered appropriate or feasible for these smaller scale projects. Therefore, the impact is considered **significant, unavoidable, and adverse (Class I).**

### Conflict with Existing Zoning for Agricultural Use, or Williamson Act Program (Threshold 2)

**Impact 3-2-2 – Solar** Implementation of the proposed Program could conflict with existing zoning for agricultural use or with the Williamson Act program. This impact is considered **less than significant (Class III).**

Renewable energy projects have significant siting constraints because they must locate close to substations with the capacity to accept additional electrical generation and be close to appropriately sized electric distribution lines. Otherwise, the cost of the infrastructure to feed electricity into the grid is prohibitive and projects are infeasible. Much of the land in close proximity to these substations is zoned for agriculture and much of that land is under Williamson Act contract.

As proposed in the Williamson Act Rules of Procedure (RoP), Tier 1 and Tier 2 SEF projects within the RE Combining Designation can be located on active Williamson Act lands provided the energy production is an accessory use to the primary agricultural use. Roof-mounted solar has no impact on an agricultural use. Ground-mounted Tier 2 and 3 SEF projects would not eligible for streamlining if proposed on Important Agricultural Soils (with the exception of an allowance on Highly Productive Rangelands, provided conservation easement requirements are met per proposed standards 22.14.100E and F). As these provisions of the proposed Program would protect Important Agricultural Soils and ensure that agricultural will continue, the impacts are considered **less than significant (Class III).**

For Tier 2 and above projects outside of the combining designation, the existence of a Williamson Act contract will need to be considered as part of the Minor or Conditional Use Permit and the associated environmental determination. The provisions of the RoP are intended to preserve the Williamson Act contracts. As proposed, the project will not result in the cancellation of Williamson Act contracts. This impact would be considered **less than significant. (Class III).**

**Impact 3-2-2 – Wind** Implementation of the proposed Program could conflict with existing zoning for agricultural use or with the Williamson Act program. This impact is considered **less than significant (Class III)**.

Tier 1 WECS will be roof-mounted and will not interfere with any Williamson Act contract. Similar to SEF projects, Tier 2 and above WECS projects will be subject to the proposed RoP requirements that limit the location of the equipment and the extent of Williamson Act land that can be affected. Compliance with the RoP ensures that the proposed Program will not result in the cancellation of a Williamson Act contract. Therefore, this impact would **less than significant (Class III)**.

**Impact 3-2-2 – Policy Changes** Implementation of the proposed Program could result in changes to countywide policies that could conflict with existing zoning for agricultural use or with the Williamson Act program. This impact would be **less than significant (Class III)**.

The proposed Program would not result in changes to the Williamson Act program that would allow cancellation or early termination. The proposed RoP establishes criteria for the siting of equipment as well as property size restrictions that ensure the agricultural use of the property remains primary and consistent with the goals of the Williamson Act program. There are no

provisions of the proposed RoP amendments or the other policy, code, and text amendments included in this project that would conflict with existing zoning or with the Williamson Act program. Therefore, this impact is considered **less than significant (Class III)**.

### Impair Agricultural Use of Other Property or Result in Conversion to Other Uses (Threshold 3)

**Impact 3-2-3 – Solar** Implementation of the proposed Program could impair agricultural use of other property or result in conversion to other uses. This impact is considered **less than significant (Class III)**.

In addition to direct impacts associated with construction on Important Agricultural Soils, operation of SEF projects could result in weeds, invasive species, and dust that may affect the agricultural use on adjacent lands. Typical SEF projects result in at least some ground clearing to allow access and installation of ground-mounted equipment. The vegetation under and around the units must also be managed to reduce fire danger and avoid interference with the SEF units. In some instances, the ground under the units may be kept nearly vegetation free to aid in maintenance, in which case soil stabilizers are typically used to prevent dust since dust diminishes the performance of PV panels. In either a vegetated or cleared state, soil (dust) blowing onto adjacent agricultural properties during operation of an SEF would not be of a frequency or degree that would be expected to result in impairment or conversion of the agricultural use.

Proposed performance standard 22.32.040.C.4 addresses the potential spread of weeds by requiring preparation of an Integrated Pest Management Plan for ground-mounted renewable energy-generating facilities. The plan would typically include a listing of plantings, herbicides used, and the frequency of use. Implementation of the proposed standards would reduce impacts related to operation of ground facilities to **less than significant (Class III).**

**Impact 3-2-3 – Wind** Implementation of the proposed Program could impair agricultural use of other property or result in conversion to other uses. This impact would **less than significant (Class III)**.

Tier 1 WECS would be roof or structure-mounted and will not impair the agricultural use of property or result in conversion of an agricultural use to a nonagricultural use. Tier 2 WECS projects are subject to the same requirements of proposed performance standard 22.32.040.C.4 and existing County regulations as SEFs. There are no operational characteristics that would otherwise be expected to result in the impairment or conversion of adjacent agricultural uses. Therefore, this impact would be **less than significant (Class III).**

**Impact 3-2-3 – Policy Changes** Implementation of the proposed Program could result in changes to countywide policies that could impair agricultural use of other property or result in conversion to other uses. This impact is considered **less than significant (Class III).**

Changes to County policies that would streamline development of renewable energy facilities could lead to the conversion of agricultural land to nonagricultural use and potentially significant impacts to surrounding farmland, if no provisions are included to address this issue. The proposed Program includes setbacks for equipment that could pose a hazard to crop dusting aircraft, as well as maintenance plans to ensure that invasive weeds do not affect adjacent agricultural uses. There are no policy changes that would otherwise be expected to result in the impairment or conversion of adjacent agricultural uses. Therefore, this impact would be **less than significant (Class III).**

## CUMULATIVE IMPACTS

As envisioned, the proposed Program is anticipated to facilitate development of up to 150 MW of renewable energy projects, which could cover up to 1,500 acres. The streamlining aspects of the project are focused on lands within the combining designation; however, Tier 1 projects could be located anywhere in the county. As shown in **Table 3-2-2**, the county has approximately 750,384 acres of Important Agricultural Soils. If all 1,500 acres were located on Important Agricultural Soils, approximately 0.20 percent of the county's Important Agricultural Soils would be converted to nonagricultural use. This figure does not represent a cumulatively considerable percentage of total agricultural land in the county. Moreover, as noted in this EIR section, it is unlikely that 1,500 acres of Important Agricultural Soils would be converted, as provisions of the program are specifically designed to direct SEF and WECS elements away from Important Agricultural Soils. Further, Tier 2 WECS facilities may also allow agricultural use to continue after installation.

The California Department of Conservation Division of Land Resource Protection oversees the Farmland Mapping and Monitoring Program (FMMP). According to the latest report from the FMMP, approximately 17,538 acres of Important Farmland and Grazing Land was converted to non agricultural use between 2008 and 2010 in the county (DOC 2014c). If all 1,500 acres of the proposed Program were located on Important Farmland, this would represent an 8.55 percent increase in conversion over the 2008–2010 time period. As noted above, this figure represents the most conservative impact potential, as provisions of the program, the RoP, and the County General Plan discourage or prohibit the conversion of agricultural land to nonagricultural resources.

The proposed Program includes Tier 1 projects that specifically avoid Important Agricultural Soils by being located on rooftops or on previously disturbed soil. While Impact 3-2-1 - Solar concludes that some Important Agricultural Soils may be converted, the Class I impact determination is as a result of an abundance of caution in this EIR, rather than an expectation of substantial conversions of agricultural land to nonagricultural uses.

Tier 2 and above projects outside of the combining designation will require either a Minor or Conditional Use Permit that are discretionary and will be accompanied by project-specific environmental analysis. This process will establish conditions of approval and project-specific mitigation measures. None of the provisions of the proposed Program are intended to result in the conversion of Important Agricultural Soils to nonagricultural use. Tier 2 and above projects outside of the combining designation are not streamlined as part of the proposed Program and must therefore address any agricultural land conversion independently, which represents no change from existing conditions.

While the proposed Program could result in the conversion of 1,500 acres of land converting Important Agricultural Soils to nonagricultural uses, it is unlikely for the reasons stated above and addressed in this EIR. Overall, as the Program is designed to encourage and streamline renewable energy development in areas that would not involve conversion of Important Agricultural Soils, it would not result in a considerable contribution to a cumulative impact.

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