San Luis West Solar Project



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AGRICULTURAL CONVERSION STUDY

Fresno County, California
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ACRONYMS AND ABBREVIATIONS

AC	alternating current
AE	exclusive agriculture
APN	assessor's parcel number
Applicant	San Luis West Solar, LLC
BESS	battery energy storage system
CCR	California Code of Regulations
CDC	California Department of Conservation
CEQA	California Environmental Quality Act
County	County of Fresno
DC	direct current
gen-tie	generation tie line
HVAC	heating, ventilation, and air conditioning
kV	kilovolt
LCC	Land Capability Classification
LESA	Land Evaluation and Site Assessment
PG&E	Pacific Gas and Electric Company
POI	Point of Interconnection
Project	San Luis West Solar + Storage Facility
PV	photovoltaic
RA	resource adequacy
RPS	renewable portfolio standard
SCADA	supervisory control and data acquisition
SLW	San Luis West
SME	subject matter expert
SR	state route
Tetra Tech	Tetra Tech, Inc.
UCUP	Unclassified Conditional Use Permit
USDA	United State Department of Agriculture

1.0 INTRODUCTION

San Luis West Solar, LLC proposes to construct and operate the proposed San Luis West Solar Project (Project), in Fresno County, California (herein referred to as the Project site). The Project will be located on seven parcels totaling approximately 1,400 acres within the "AE-20" and "AE-40" (Exclusive Agriculture) zoning districts of unincorporated Fresno County (County), however, the Project site, which encompasses all areas of temporary and permanent impacts, is approximately 1,100 acres. The Project requires compliance with the California Environmental Quality Act (CEQA). Tetra Tech, Inc. prepared this Agricultural Conversion Study (Study) including the California Agricultural Land Evaluation and Site Assessment (LESA) and a farmland conversion assessment for the proposed Project site (approximately 1,100 acres) to analyze the conversion of farmland to non-agricultural uses. This report provides the results of the analysis, which concluded that the Project will not result in a significant loss of farmland and will not have a significant impact on agricultural land use.

2.0 PROJECT DESCRIPTION

The Project consists of a photovoltaic (PV) solar generating facility with a nameplate production capacity of 125 megawatts (MW) of alternating current (AC) renewable energy as well as a Battery Energy Storage System (BESS) capable of storing approximately 30 MW of energy with a 4-hour/120 MW-hour (MWh) storage duration. The Project is a utility-scale solar farm on seven parcels totaling approximately 1,100 acres, including solar panels, security fencing, and BESS storage modules.

The desired Commercial Operation Date for the Project is December 31, 2025, with construction anticipated to commence in 2025. The anticipated operational lifespan of the Project is a minimum of 35 years. If the solar lease is to be extended beyond the approved land use permit, approval of new land use permit will need to be obtained.

2.1 Project Location

The Project site is located in an unincorporated area of southern Fresno County (County), approximately 10 miles northwest of Kettleman City and will connect to Pacific Gas and Electric Company's (PG&E's) 500-kV Gates substation (see Figure 1). The seven parcels associated with the project occupy parts of six different sections, spread among Townships 20 and 21 South, and Ranges 17 and 18 East, of the Mount Diablo Meridian (see Figure 2). The Project parcels are situated adjacent or proximal to West Jayne Avenue, from the Gates substation on the western extent to the California Aqueduct on the eastern extent. The Project site is primarily agricultural land, zoned AE-20 or AE-40 (Exclusive Agriculture with a minimum lot size) in the unincorporated areas of Fresno County. The parcels in the general vicinity of the Project site are similarly zoned.

It is anticipated that primary access to the Project site will originate via Interstate 5 to exit 325, West Jayne Avenue; a paved Fresno County road featuring one lane of traffic in each direction (east and west). From there, traffic will travel eastbound along West Jayne Avenue to the proposed Facility site. A network of currently existing agricultural roads within the Project site will be utilized for ingress and egress throughout construction. No road improvements are currently proposed as a part of the Project, unless required by the County.

The Project will be located on seven parcels totaling approximately 1,100 acres within the "AE-20" and "AE-40" (Exclusive Agriculture) zoning districts of unincorporated Fresno County (County). The Project parcels are situated adjacent or proximal to West Jayne Avenue, from the Gates substation on the western extent to the California Aqueduct on the eastern extent.

The Project site includes three subareas, shown on Figure 2 as Subareas A, B, and C. These Subareas are defined as follows:

- **Subarea A:** Includes approximately 280 acres of solar arrays and associated infrastructure (i.e., internal roads, medium voltage collection lines, substation, BESS and project O&M building) located on four parcels totaling approximately 800 acres, of which approximately 650 acres are currently leased by the Project and approximately 150 acres are owned by the Project. Subarea A is located southeast of the existing PG&E Gates Substation, immediately south of West Jayne Avenue and approximately 0.5-mile due west of SR-269. The Substation will also be located within Subarea A and it is anticipated that the BESS will be co-located with the Substation in Subarea A. Two temporary laydown areas totaling approximately 10 acres would be located in Subarea A, along West Jayne Avenue.
- **Subarea B:** Includes approximately 250 acres of solar arrays and associated infrastructure (i.e., internal roads and medium voltage collection lines) on one parcel, consisting of approximately 300 acres of fully leased land. Subarea B is bordered by SR-269 to the west, West Jayne Avenue to the south, and active row crops to the east.
- **Subarea C:** Include approximately 240 acres solar arrays associated infrastructure (i.e., internal roads and medium voltage collection lines) on approximately 325 acres of land leased by the Project. Subarea C consists of two parcels located just west of the California Aqueduct. West Jayne Avenue bisects the bottom half of Subarea C.

Energy from the solar arrays will be transmitted to the Project substation via a series of 34.5-kilovolt (kV) collection lines. As depicted in Figure 2, the collection line will begin in the middle section of Subarea B and run directly south along an existing agricultural road for approximately 0.75-mile before angling slightly west and undergrounding at West Jayne Avenue to connect with Subarea A. The collection line system will connect to the BESS and Substation in Subarea A, then a 230 kV gen-tie line will connect from Subarea A to the Point of Interconnection (POI) at the PG&E Gates substation.

2.2 Site History

The Project is located on privately-owned lands, that have been historically used for agriculture since at least 1955 (Tetra Tech 2024a). The Project parcels are not home to any permanent crops such as fruit trees.

3.0 REGULATORY SETTING

3.1 California Land Conservation Act of 1965

The California Land Conservation Act of 1965 (Williamson Act, Government Code Section 51200 et seq.) prevents farmland from conversion to other uses by offering owners of agricultural land a

property tax incentive to maintain their land in agricultural use. The Williamson Act is a state program implemented at the county level that allows agricultural landowners to voluntarily and contractually agree to retain land included in an agricultural preserve in agricultural or open space uses for a period of at least 10 years and, in return, to pay reduced property taxes. The term of the contract automatically renews each year, such that unless it is specifically nonrenewed or canceled, the contract always has a 10-year period horizon.

The most common method for withdrawing from a Williamson Act contract is filing a notice of nonrenewal, which can be initiated by either the land use agency or the landowner. Under this process, the contract is ended after a 9-year nonrenewal period, during which taxes gradually increase every year. A Williamson Act contract cancellation is an option under limited circumstances and conditions set forth in Government Code Section 51280 et seq. In such cases, landowners may petition the board or council of their county or city for cancellation of the Williamson Act contract. The board or council may grant tentative cancellation only if it makes one of the following required statutory findings (Government Code Section 51282(a)):

1. That the cancellation is consistent with the purposes of Section 51282. Cancellation of a contract is consistent if the board or council makes all of the following findings:
    1) That the cancellation is for land on which a notice of nonrenewal has been served pursuant to Section 51245.
    2) That cancellation is not likely to result in the removal of adjacent lands from agricultural use.
    3) That cancellation is for an alternative use which is consistent with the applicable provisions of the city or county general plan.
    4) That cancellation will not result in discontiguous patterns of urban development.
    5) That there is no proximate noncontracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or, that development of the contracted land would provide more contiguous patterns of urban development than development of proximate noncontracted land.
2. That cancellation is in the public interest. Cancellation of a contract is in the public interest if the council or board makes the following findings:
    1) that other public concerns substantially outweigh the objectives of this chapter;
    2) and that there is no proximate noncontracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or that development of the contracted land would provide more contiguous patterns of urban development than development of proximate noncontracted land.

The board or council must consider comments from the director of the California Department of Conservation (CDC) before acting on a proposed cancellation if comments are provided. A cancellation becomes final and a Certificate of Cancellation is issued by the board or council upon the completion of all Conditions of Approval.

The CDC provides guidance regarding the placement of solar facilities on agricultural land (CDC 2023). As discussed in *Solar Power and the Williamson Act*, the Williamson Act does not specifically address the placement of solar power generation facilities on land subject to it. However, depending on the specific characteristics of a particular facility, and the wishes of the landowner, there are five options in which a solar power generation facility may be located on land subject to the Williamson Act.

First, locating a solar power generation facility on land within an agricultural preserve may be allowed as a compatible use depending on the local rules governing compatibility. This is a discretionary action of the local government.

Second, the landowner may provide notice of non-renewal to the city or county administering the Williamson Act contract on the land, and eventually remove the Williamson Act's restrictions over use of the land.

Third, the contract may be "cancelled" pursuant to required statutory processes under appropriate circumstances. Here, in almost all cases, the landowner would be responsible for paying a cancellation fee.

Fourth, a public agency with the power of eminent domain may acquire land subject to a Williamson Act contract (through eminent domain or in-lieu of eminent domain), thereby "nullifying" the contract and rendering the land free from the contract's restrictions.

Fifth, a Solar Use Easement may be entered into simultaneously with rescinding a Williamson Act or Farmland Security Zone contract. This is a discretionary action of the local government.

3.2 Farmland Security Zone Act

The Farmland Security Zone Act was passed by the California State Legislature in 1999 to ensure that long-term farmland preservation is part of public policy (Government Code sections 51296-51297.4). Under the provisions of this act, a landowner already under a Williamson Act contract can apply for Farmland Security Zone status by entering into a contract with the county. Farmland Security Zone contracts must be for an initial term of at least 20 years.

3.3 Farmland Mapping and Monitoring Program

The goal of the Farmland Mapping and Monitoring Program (FMMP) is to provide consistent, timely, and accurate data to decision-makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, FMMP provides maps and statistical data to the public, academia, and government agencies to assist them in making informed decisions for the utilization of California's farmland. FMMP was established in 1982 in response to a need for assessing agricultural lands and informing decisions affecting the conversion of these lands over time. FMMP regularly reports on the conversion of farmland and grazing lands, provides maps, and maintains a database system to record and report changes in the use of agricultural lands throughout California.

Important farmland mapping efforts were initially begun in 1975 by the U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS), and now continue through the FMMP. The intent was to produce agricultural resource maps based on soil quality and land use across the nation. As part of this nationwide mapping effort, NRCS developed a series of definitions known as the Land

Inventory and Monitoring (LIM) criteria. The LIM criteria classified the land's suitability for agricultural production, which includes physical and chemical characteristics of soils, as well as specified land use characteristics. Important farmland maps are derived from NRCS soil survey maps using LIM criteria.

3.3.1 Important Farmlands

Important farmland maps are compiled by the FMMP, pursuant to the provisions of Section 65570 of the California Government Code. These maps, utilizing data from the NRCS soil survey and current land use information using eight mapping categories, represent an inventory of agricultural resources within Fresno County. The maps depict currently urbanized lands and a qualitative sequence of agricultural designations. Maps and statistics are produced biannually using a process which integrates aerial photo interpretation, field mapping, a computerized mapping system and public review.

Land is classified into one of eight categories (five relating to farming and three associated with nonagricultural purposes). These include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, Other Land and Water. Categories identified within the Project site include:

- **Prime Farmland** is defined as having the best combination of physical and chemical features able to sustain long-term agricultural production. Prime Farmland 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** is 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** is farmland of lower quality soils used for the production of the State’s leading agricultural crops. This land is usually irrigated but may include non-irrigated 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** is land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.
- **Grazing Land** is land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.
- **Urban and Built-up Land** is 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, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

- **Other Land** is land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. Other Land subcategories include Semi-Agricultural and Rural Commercial Land and Vacant or Disturbed Land.

3.4 Fresno General Plan

The Agriculture and Land Use Element of the General Plan describes land use designations and development standards for land in unincorporated Fresno County, and establishes goals, policies, and programs related to agriculture and land use. The General Plan land use designation for the Project site is Agriculture, which provides for the production of crops and livestock, and for location of necessary agriculture commercial centers, agricultural processing facilities, and certain non-agricultural activities. (Fresno County 2024). The following goal, policies, and program related to agriculture are applicable to the Project:

Goal LU-A: To promote the long-term conservation of productive and potentially productive agricultural lands and to accommodate agricultural-support services and agriculturally-related activities that support the viability of agriculture and further the County's economic development goals.

Policies:

LU-A.1 Agricultural Land Conservation

The County shall maintain agriculturally-designated areas for agriculture use and shall direct urban growth away from valuable agricultural lands to cities, unincorporated communities, and other areas planned for such development where public facilities and infrastructure are available or can be provided consistent with the adopted General or Community Plan.

LU-A.2 Agriculture-related Uses

The County shall allow by right in areas designated Agriculture activities related to the production of food and fiber and support uses incidental and secondary to the on-site agricultural operation.

LU-A.3 Special Agricultural Uses

The County may allow by discretionary permit in areas designated Agriculture, special agricultural uses and agriculturally-related activities, including value-added processing facilities, and certain non-agricultural uses. Approval of these and similar uses in areas designated Agriculture shall be subject to the following criteria:

a. The use shall provide a needed service to the surrounding agricultural area which cannot be provided more efficiently within urban areas or which requires location in a non-urban area because of unusual site requirements or operational characteristics;

b. The use should not be sited on productive agricultural lands if less productive land is available in the vicinity;

c. The operational or physical characteristics of the use shall not have a detrimental impact on water resources or the use or management of surrounding properties within at least one-quarter (1/4) mile radius;

d. A probable workforce should be located nearby or be readily available;

LU-A.12 Agricultural Protection

In adopting land uses policies, regulations, and programs, the County shall seek to protect agricultural activities from encroachment of incompatible land uses.)

LU-A.13 Agricultural Buffers

The County shall protect agricultural operations from conflicts with non-agricultural uses by requiring buffers between proposed non-agricultural uses and adjacent agricultural operations. Additionally, the County shall consider buffers between agricultural uses and proposed sensitive receptors when processing discretionary land use applications.

LU-A.14 Agricultural Land Conversion Review

The County shall ensure that the review of discretionary permits includes an assessment of the conversion of productive agricultural land and that mitigation be required where appropriate.

LU-A.16 Agricultural Land Preservation Programs

The County should implement agricultural land preservation programs for long-term conservation of viable agricultural operations. Examples of programs to be considered include: land trusts; conservation easements; dedication incentives; new and continued Williamson Act contracts; Farmland Security Act contracts; the California Farmland Conservancy Program; agricultural education programs; zoning regulations; agricultural mitigation fee program; urban growth boundaries; transfer of development rights; purchase of development rights; and agricultural buffer policies.

LU-A.17 Williamson Act Contracts

The County should accept Williamson Act contracts on all designated agricultural land subject to location, acreage, and use limitations established by the County provided that the County receives full subvention payment as partial replacement of local property tax revenue foregone as a result of participating in the Williamson Act program. All development and uses and activities that occur on land under contract shall comply with the requirements of the California Land Conservation Act and adopted County Rules.

LU-A.19 Reduced Soil Erosion

The County shall encourage landowners to participate in programs that reduce soil erosion and increase soil productivity. To this end, the County shall promote coordination between the Natural Resources Conservation Service, Resource Conservation Districts, UC Cooperative Extension, and other agencies and organizations.

LU-A.23 Farmland Conversion

For discretionary land use projects that are not directly related to or supportive of agricultural uses and which propose the permanent conversion of twenty acres or more of Prime Farmland, Unique Farmland or Farmland of Statewide Importance (as designated by the Farmland Mapping and Monitoring Program) to nonagricultural uses, the County shall consider and adopt feasible measures including, but not limited to:

- Acquisition of conservation easements at a 1:1 ratio for lands lost to nonagricultural uses.
- Fee title of agricultural mitigation land that may be held by a third party or the County.
- In lieu fees paid to the County that may be used to acquire future mitigation property.
- Mitigation banks.

The County may exempt projects from agricultural mitigation requirements when it has been determined that conversion is occurring pursuant to a local groundwater sustainability plan, or the project is for housing which is predominately for persons of low or moderate income as defined in section 50093 of the Health and Safety Code. Further, the County may exempt discretionary land use projects from agricultural mitigation requirements if it finds that the loss of agricultural land caused by the proposed conversion is outweighed by specific overriding economic, legal, social, technological, or other benefits of the conversion, as contemplated by section 21081(b) of the Public Resources Code.

3.5 Fresno General Plan Zoning Districts

The Project is within the “AE-20” (Exclusive Agriculture, 20-acre minimum parcel size) and “AE-40” (Exclusive Agriculture, 40-acre minimum parcel size) zoning districts. The “AE” District is intended to protect agricultural land and provide for those uses which are necessary and an integral part of an agricultural operation. This zone is intended to protect the general welfare of the agricultural community from encroachments of non-related agricultural uses.

The AE zone shall be accompanied by an acreage designation which establishes the minimum size of parcels that may be created within the zone, including designations of 640, 320, 160, 80, 40, and 20 acres. The AE zone is consistent with the Agriculture, Irrigated Agriculture, and Westside/Eastside Rangeland land use designations of the General Plan. Within these zoning districts, the County permits utility-scale solar energy uses with an Unclassified Conditional Use Permit (UCUP).

3.6 Fresno County Solar Facilities Guidelines

Fresno County has guidelines for solar facilities (County of Fresno 2017) with the rationale that the need to accommodate new renewable energy technology must be balanced with the need to protect important farmlands and minimize impacts to existing agricultural operations. The land use process for evaluating solar facilities should rely on general guidelines and policies rather than specific standards, which may not be flexible enough to accommodate the evolving technology.

According to the above guidelines, applicants for solar facilities shall address the following as part of the application review process:

1. Information shall be submitted regarding the historical agricultural operational/usage of the parcel, including specific crop type and crop yield, for the last ten years (if no agricultural operation in the last ten years, specify when land was last in agricultural use); and
2. Information shall be submitted that identifies the source of water for the subject parcel (surface water from irrigation district, individual well(s), conjunctive system). If the source of water is via district delivery, the applicant shall submit information documenting the allocations received from the irrigation district and the actual disposition of the water (i.e. utilized on-site or moved to other locations) for the last ten years. If an individual well system is used, provide production capacity of each well, water quality data and data regarding the existing water table depth; and
3. Identify the current status of the parcel (Williamson Act Contract, Conservation Easement, retired land, etc.), the purpose of any easement and limitations of the parcel. The applicant shall submit a Title Report or Lot Book Guarantee for verification.
4. Identify (with supporting data) the current soil type and mapping units of the parcel pursuant to the standards of the California State Department of Conservation and the Natural Resources Conservation Service; and
5. List all proposed measures and improvements intended to create a buffer between the proposed solar facility and adjacent agricultural operations (detailed information must be shown on Site Plan) and provide factual/technical data supporting the effectiveness of said proposed buffering measures; and
6. Provide a Reclamation Plan detailing the lease life, timeline for removal of the improvements and specific measures to return the site to the agricultural capability prior to installation of solar improvements; and
7. Provide information documenting efforts to locate the proposed solar facility on non-agricultural lands and non-contracted parcels and detailed information explaining why the subject site was selected.
8. Develop and submit a project site Pest Management Plan to identify methods and frequency to manage weeds, insects, disease and vertebrate pests that may impact adjacent sites.
9. The applicant must acknowledge the County's Right to Farm Ordinance and shall be required to record a Right to Farm Notice prior to issuance of any permits. This shall be included as a recommended Condition of Approval of the land use entitlement.
10. Note: The life of the approved land use permit will expire upon expiration of the initial life of the solar lease. If the solar lease is to be extended, approval of new land use permit will need to be obtained.
11. If the project is approved, the applicant shall make all reasonable efforts to establish a point of sale in Fresno County for equipment and construction related items necessary for the project.

12. If the project is approved, the applicant shall make all reasonable efforts to conduct local recruitment efforts and/or coordinate with employment agencies in an attempt to hire from the local workforce.
13. In addition to disclosing the number of trips in the required project Operational Statement, the applicant shall disclose the weight of the shipments anticipated to the site. If the project is approved, pursuant to the CEQA analysis and based upon the existing road conditions and the weight/frequency of shipments to the site, the applicant shall mitigate impacts to County roads.
14. If the project is approved, the applicant shall make all reasonable efforts to purchase products and equipment from local (Fresno County) manufacturing facilities and/or vendors.

3.7 Fresno County Right-To-Farm Notice

It is the declared policy of Fresno County to preserve, protect, and encourage the development of its agricultural land and industries for the production of food and other agricultural products. Residents of property in or near agricultural districts should be prepared to accept the inconveniences and discomfort associated with normal farm activities. Consistent with this policy, California Civil Code 3482.5 (right-to-farm law) provides that an agricultural pursuit, as defined, maintained for commercial uses shall not be or become a nuisance due to a changed condition in a locality after such agricultural pursuit has been in operation for three years.

4.0 ENVIRONMENTAL SETTING

4.1 Regional Setting

Fresno County is the most agriculturally rich county in the United States, with a total of 6,011 square miles (3,847,040 acres) and approximately 2,165,797 acres in agricultural use. Of this acreage, approximately 1,346,199 acres have the following Important Farmland designations: Prime Farmland (663,706 acres), Farmland of Statewide Importance (385,283 acres), Unique Farmland (95,048), and Farmland of Local Importance (202,162 acres), which account for a combined 56 percent of the county area (CDC 2024a).

4.2 Local Setting

The Project site is located within the Central Valley region of Fresno County. The region consists of a single broad, flat valley, drained by the San Joaquin River and its tributaries, bound by the Sierra Nevada to the east and the Coast Range to the west. The elevation ranges from about 150 to 450 feet above sea level. Historically, the dominant habitat types were arid grasslands and shrub lands with expansive Valley Oak riparian woodlands and freshwater emergent wetlands in the proximity of water sources. Today, most of the land has been converted to agricultural uses.

4.3 Land Use Designations

The Project is located on privately owned lands historically used for agriculture. The Project site is designated as Agriculture in the Fresno County General Plan and is zoned Exclusive Agriculture (AE) in

accordance with Fresno County's Zoning Classification (Figure 3). The CDC's California Important Farmland Map lists most of the Project site as Prime Farmland, with some smaller areas designated as Nonprime Agriculture Land (Table 1 and Figure 4, Important Farmland Designations/Williamson Act Contract). The Project parcels are currently subject to the Williamson Act (Figure 4).

Table 1. California Important Farmland

Category	Acres
Prime Farmland	1,091
Semi-Agricultural and Rural Commercial Land	6
Vacant or Disturbed Land	3
Total Acres	1,100.0

4.4 Soils

A review of the USDA soil survey data indicates that four soil units (three soil series and one association) are mapped within the vicinity of the Project site, and three of these are designated as Prime Farmland.

Soil units identified within the Project site by the Natural Resources Conservation Service (USDA-NRCS 2024) include the soils series listed below (see Figure 5, Soils).

- **Kimberlina sandy loam, 0 to 2 percent slopes (425):** This soil is a deep, well-drained soil that develops on a parent material of alluvium derived from calcareous sedimentary rock; and has a common soil profile generally up to 72 inches deep. This soil is not considered to be hydric but is identified as Prime Farmland if irrigated.
- **Excelsior sandy loam, 0 to 2 percent slopes (445):** This soil is a deep, well-drained soil that develops on a parent material of alluvium derived from calcareous coarse-loamy alluvium derived from sedimentary rock; and has a common soil profile generally up to 72 inches deep. This soil is not considered to be hydric but is identified as Prime Farmland if irrigated.
- **Excelsior sandy loam, sandy substratum, 0 to 2 percent slopes (447):** This soil is a deep, well-drained soil that develops on a parent material of alluvium derived from calcareous sedimentary rock; and has a common soil profile generally up to 72 inches deep. This soil is not considered to be hydric but is identified as Prime Farmland if irrigated.
- **Westhaven loam, 0 to 2 percent slopes (474):** This soil also is a deep, well-drained soil that develops on a parent material of alluvium derived from calcareous sedimentary rock; and has a common soil profile generally up to 72 inches deep. This soil is not considered to be hydric but is identified as Prime Farmland if irrigated.

The soil survey indicates all of the specific soil series within the Project site as Prime Farmland if irrigated, and the land use data for the area indicates the Project site and surrounding lands are all used for cultivated crops (see Figure 6, Land Cover). The Project site has been historically irrigated and is considered Prime Farmland.

4.5 Water Availability

The Project parcels have been historically irrigated for agricultural production. The Project site falls within the Tulare-Buena Vista Lakes basin. This area contains no perennial water courses and few defined channels due to the predominance of agricultural fields and low rainfall amounts. The Project site and the surrounding area obtain irrigation water either from the Westlands Water District (WWD) or from private water wells (Tetra Tech 2024b). Subarea A of the Project site contains two water wells, see Figure 2, which are used for the irrigation of Parcels 08505047S, 08505048S, 08505084S. The remaining parcels in Subarea A and all of Subareas B and C use WWD water for irrigation.

San Luis West Solar, LLC owns the two wells and the parcels that they are located on within Subarea A. These deep groundwater supply wells each have a peak production capacity of 2,000 gallons per minute (GPM). Water from these two wells is intended to be the sole water-supply source for the Project and are expected to provide adequate water supply for all phases of the project (Tetra Tech 2024b).

Groundwater for this area is obtained from the Westside Subbasin. Because the Westside Subbasin has been categorized as a critically overdrafted, WWD and Fresno County have prepared a Groundwater Sustainability Plan (GSP) for the Westside Subbasin, to establish the necessary rules and regulations to secure sustainability (Tetra Tech 2024b). The primary method for achieving the sustainability goal of the GSP is to establish a framework for limiting the annual volume of water pumped from individual wells and for monitoring the volumes of pumped groundwater. The limits placed on an individual well establishes the annual volume of water for the acres attached to (serviced by) the well. Table 2 (WWD Annual Groundwater Allocation) shows the annual volumes allowed per well, and the schedule for reduction of this amount to reach sustainable levels. While the sustainable yield is the goal every year, during the transition period (until 2030), and additional transition allocation (as shown in Table 2) is allowed, raising the actual allocation (if needed) to the Allocation Cap. There are allowances for carrying over any unused transition allocation to the following year, with some limitations.

Table 2. WWD Annual Groundwater Allocation

Year	Allocation Cap	Transition Allocation	Sustainable Yield	Project Allocation\1
	(AFY per Gross Acre)			AFY
2022	1.3	0.7	0.6	--
2023	1.3	0.7	0.6	--
2024	1.2	0.6	0.6	--
2025	1.1	0.5	0.6	1,174
2026	1.0	0.4	0.6	1,067
2027	0.9	0.3	0.6	960
2028	0.8	0.2	0.6	854
2029	0.7	0.1	0.6	747
2030-2052	0.6	0.0	0.6	640

Source: WWD-GSA 2023

\1 Project allocation based on two wells located in Subarea A.

5.0 METHODOLGY

In order to determine Project impacts to agricultural resources, a LESA and a farmland conversion assessment were conducted.

5.1 LESA

In determining whether impacts to agricultural resources are significant environmental effects, the lead agency may refer to the California Agricultural LESA Model (CDC 1997) prepared by the CDC to assess impacts on agriculture and farmland. The LESA system is a point-based model that is generally used for rating the relative value of agricultural land resources. The CDC developed a LESA Model to "provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process" (Public Resources Code Section 21095).

The California Agricultural LESA Model comprises six different factors: two Land Evaluation factors and four Site Assessment factors.

5.1.1 Land Evaluation Factors

Two Land Evaluation factors are based on measures of soil resource quality that are separately rated:

1. The USDA Land Capability Classification (LCC) Rating—The LCC indicates the suitability of soils for most kinds of crops. Groupings are made according to the limitations of the soils when used to grow crops and the risk of damage to soils when they are used in agriculture. Soils are rated from Class I to Class VIII, with soils having the fewest limitations receiving the highest rating (Class I). Subclasses designated with a lower-case letter are typically used in conjunction with the roman numerals to further describe soil limitations. The letter "e" indicates that the main limitation of the soil is erosion. The LCC has separate scales used independently for irrigated and non-irrigated lands.
2. The Storie Index Rating—The Storie Index provides a numeric rating (based upon a 100-point scale) of the relative degree of suitability or value of a given soil for intensive agriculture. The rating is based upon based on surface and subsurface chemical and physical soil properties and surface landscape characteristics of the soil only. Four factors that represent the inherent characteristics and qualities of the soil are considered in the index rating. The factors are profile characteristics (permeability, available water capacity, and depth of the soil), texture of the surface layer, slope, and other factors (e.g., drainage, salinity).

5.1.2 Site Assessment Factors

Four Site Assessment factors provide measures of a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, each of these factors is separately rated on a 100-point scale based on qualities as they relate to agricultural suitability. A score of 100 has the highest suitability. The factors are then weighted relative to one another and combined, resulting in a single numeric score for a given project, with a maximum attainable score of 100 points. It is this project score that becomes the basis for making a

determination of a project's potential significance, based upon a range of established scoring thresholds (CDC 1997). The Site Assessment factors are determined as follows:

1. The Project Size Rating recognizes the role that farm size plays in the viability of commercial agricultural operations. In general, larger farming operations can provide greater flexibility in farm management and marketing decisions. Larger operations tend to have greater impacts upon the local economy through direct employment. In terms of agricultural productivity, the size of the farming operation can be considered not just from its total acreage, but the acreage of different quality lands that comprise the operation. Lands with higher quality soils lend themselves to greater diversity in crop selection and the potential for greater economic return per acre unit. The Project Size Rating is determined by summing the acres in a project that fall within one of three consolidated LCC categories: LCC Classes I-II, LCC Class III, LCC Classes IV-VIII. Project Size Score is determined from the Project Size Scoring Table from the California Agricultural Land Evaluation and Site Assessment Instruction Manual (CDC 1997). Under the Project Size Score Table ratings, relatively fewer acres of high-quality soils are required to achieve a maximum project size score of 100.
2. The Water Resources Availability Rating is based upon identifying the various sources that may supply a project area, and then determining whether different restrictions in supply are likely to take place in years that are characterized as being periods of drought and non-drought. The Water Resources Availability Score is determined from the California Agricultural Land Evaluation and Site Assessment Instruction Manual's scoring table (CDC 1997).
3. The Surrounding Agricultural Land Rating is designed to provide a measurement of the level of agricultural land use for lands within the Zone of Influence of the Project site. The LESA Model rates the potential significance of the conversion of an agricultural parcel that has a large proportion of surrounding land in agricultural production more highly than one that has a relatively small percentage of surrounding land in agricultural production.
4. The Surrounding Protected Resource Land Rating is essentially an extension of the Surrounding Agricultural Land Rating and is scored in a similar manner. Protected resource lands are those lands with long term use restrictions that are compatible with or supportive of agricultural uses of land including: publicly owned lands maintained as park, forest, or watershed resources; Williamson Act contracted lands; and lands with natural resource easements that restrict the conversion of such land to urban or industrial uses. The Zone of Influence is the amount of surrounding lands up to a minimum of one-quarter mile from the Project boundary.

5.1.3 Final LESA Score

The LESA Model is weighted so that 50 percent of the total LESA score of a given project is derived from the Land Evaluation factors, and 50 percent from the Site Assessment factors as follows:

Land Evaluation factors: weight 50 percent of total LESA score

- Land Capability Classification factor weight: 25 percent

- Storie Index factor weight: 25 percent

Site Assessment factors: weight 50 percent of total LESA score

- Project Size factor weight: 15 percent
- Water Resource Availability factor weight: 15 percent
- Surrounding Agricultural Land factor weight: 15 percent
- Protected Resource Land factor weight: 5 percent

The final score is evaluated based on the LESA Model Significance Determination from the California Agricultural LESA Model Instruction Manual (CDC 1997), shown below in Table 3.

Table 3. LESA Model Significance Determination

Total LESA Score	Scoring Decision
0–39 Points	Not considered significant
40–59 Points	Considered significant *only* if both the Land Evaluation and Site Assessment (found in Table E from the California Agricultural Land Evaluation and Site Assessment Instruction Manual [CDC 1997]) weighted factor subscores are each *greater* than or equal to 20 points.
60–70 Points	Considered significant *unless* either of the Land Evaluation and Site Assessment weighted factor subscores is *less* than 20 points.
80–100 Points	Considered significant

5.2 Farmland Conversion Assessment

A farmland conversion assessment was conduction findings required to determine if a cancellation is consistent with the purposes of Section 51282, see Section 3.1.

6.0 PROJECT LESA RESULTS

A LESA was prepared in order to evaluate impacts to farmland located in the Project site. The LESA considered the six factors of the LESA Model: two Land Evaluation factors composed of LCC and Storie Index ratings; and four Site Assessment factors composed of the project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands.

6.1 Project Land Capability Classification and Storie Index Scores

In order to assess the LCC and Storie Index factors, the soils within the Project site were identified using a custom Soil Resource Report from the USDA NRCS. As discussed under Section 4, Environmental Setting, the soil survey data indicates that nine soil units are mapped within the Project site. The LCC and Storie Index scores generated using the LESA model are provided in Table 4.

Table 4. Project Land Capability Classification and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit[1]	Project Acres	Percent of Project site	LCC1	LCC Rating[2]	LCC Score (C x E)	Storie Index[1]	Storie Index Score (C x G)
425	151	14%	I[3]	100	14	90	12.6
445	30	3%	I[3]	100	3	90	2.7
447	146	13%	I[3]	100	13	80	10.4
474	773	70%	I[3]	100	70	95	66.5
Totals	**1,100**	**100**		**LCC Total Score**	**100**	**Storie Index Total Score**	**92.2**

1 The Soil Map Unit information and acreage, LCC and Storie Index information were determined from the current soil survey information available at the U.S. Department of Agriculture Natural Resources Conservation Service (USDA-NRCS 2024).

2 The LCC Rating for irrigated land was determined from the LCC Point Rating Table 2 from the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual (CDC 1997).

3 Irrigated.

6.2 Project Size Scores

The Project Size Score ratings are provided in Table 5. Due to the amount of LCC Class I-II acres, the Project Size Score is 100.

Table 5. Project Size Score

	LCLC Class I-II	LCC Class III	LCC Class IV-VIII
Total Acres	1,100	0	0
Project Size Scores[1]	100	0	0
Highest Project Size Score	**100**	0	0

1 Project Size Score was determined from the Project Size Scoring Table from the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual (CDC 1997).

6.3 Project Water Resources Availability

The Water Resources Availability rating is based upon identifying the various sources that may supply a project area, and then determining whether different restrictions in supply are likely to take place in years that are characterized as being periods of drought and non-drought. As discussed in Section 4.5, Environmental Setting, the Project site has been historically irrigated with water from either WWD or private wells. The two private wells located in Subarea A will supply the water needs for the Project. Available pumping allocations will decrease over the life of the Project. Table 6 summarizes the water availability in the Project site. The Project has a water resource score of 65 because irrigation production is feasible and there are physical and economic restrictions to water availability in both drought and non-drought years. These physical and economic restrictions include limitations on pumping that will continue to increase until 2030 and additional cost of water to supplement shrinking pumping allocations and/or loss of income from planting a less profitable crop that uses less water.

Table 6. Project Water Resources Availability

A	B	C	D	E
Project Portion	Water Source	Proportion of Project Site	Water Availability Score[1]	Weighted Availability Score (C x D)
All	On-site wells	1	65	65
		Total Water Resource Score		65

1 Water Resources Availability Score was determined from the scoring table from the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual (CDC 1997).

6.4 Project Surrounding Agricultural Land Rating

The Surrounding Agricultural Land Rating is designed to provide a measurement of the level of agricultural land use for lands within the Zone of Influence of the Project site. The LESA Model rates the potential significance of the conversion of an agricultural parcel that has a large proportion of surrounding land in agricultural production more highly than one that has a relatively small percentage of surrounding land in agricultural production.

The Surrounding Protected Resource Land Rating is essentially an extension of the Surrounding Agricultural Land Rating and is scored in a similar manner. Protected resource lands are those lands with long term use restrictions that are compatible with or supportive of agricultural uses of land including: publicly owned lands maintained as park, forest, or watershed resources; Williamson Act contracted lands; and lands with natural resource easements that restrict the conversion of such land to urban or industrial uses. The Zone of Influence is the amount of surrounding lands up to a minimum of one-quarter mile from the project boundary.

As shown in Figure 6, Land Cover, the Project's Zone of Influence is made up of predominately of cultivated crops (orchards and row crops). Figure 4, Important Farmland Designations/Williamson Act Contract, shows the Williamson Act Parcels in the Project's Zone of Influence. Table 7 summarizes the findings of the Project.

Table 7. Project Surrounding Agricultural Land Rating

A	B	C	D	E	F	G
Zone of Influence						
Total Acres	Acres in Agriculture[1]	Acres of Protected Resource Land[1]	Percent in Agriculture (B/A)	Percent Protected Resource Land (C/A)	Surrounding Agricultural Land Score[2]	Surrounding Protected Resource Land Score[2]
2,574	2,318	2,236	90%	89%	100	100

1 Farmland Mapping and Monitoring Program (FMMP) (CDC 2024b)
2 Score was determined from the scoring table from the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual (CDC 1997).

6.5 Project Final LESA Score

The Project's scores of the two Land Evaluation factors and the four Site Assessment factors were weighted and totaled. Table 8 summarizes the Project's Final LESA Score.

Table 8. Project Final LESA Score

	Factor Scores	Percent Factor Weight	Weighted Factor Scores
Land Evaluation Factors			
Land Capability Classification	100	25%	25
Storie Index	92.2	25%	23
Land Evaluation Subtotal			*48*
Site Assessment Factors			
Project Size	100	15%	15
Water Resource Availability	65	15%	9.75
Surrounding Agricultural Land	100	15%	15
Protected Resource Land	100	5%	5
Site Assessment Total			*44.7*
	Final LESA Score		**92.7**

As shown in Table 3, a final LESA score ranging from 80–100 points is considered significant.

7.0 FARMLAND CONVERSION ASSESSMENT

7.1 Important Farmland Conversion

The Fresno County CEQA Checklist identifies the following criteria, as established in Appendix G of the CEQA Guidelines, to determine if a project could potentially have significant adverse effects on agriculture resources if the project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Important (Farmland), as shown on the maps pursuant to the FMMP of the California Resources Agency, to non-agricultural uses.

As discussed in Section 4.3, the CDC's California Important Farmland Map lists approximately 1,091 acres of the Project site as Prime Farmland. This analysis conservatively assumes that the entire approximately 1,100-acre Project site would be converted to non-agricultural use for a minimum of 35 years. Construction and operation of the Project would take the Project site acreage out of production for at least 35 years. However, construction and operation of the proposed Project would not adversely affect any of the environmental characteristics of the site that qualify it for mapping as Prime Farmland on the basis of its Storie Index Rating.

As described in Section 5.1, the Storie Index rating is based on surface and subsurface chemical and physical soil properties and surface landscape characteristics of the soil only. Four factors that represent the inherent characteristics and qualities of the soil are considered in the index rating. The factors are profile characteristics (permeability, available water capacity, and depth of the soil), texture of the surface layer, slope, and other factors (e.g., drainage, salinity).

The chemical and physical soil properties would remain substantially the same under Project conditions. Soil chemical properties primarily include concentrations of specific chemicals such as phosphorus, nitrogen, carbon, and other nutrients. No application of fertilizers or other soil amendments is proposed. Water-based dust suppression or appropriate soil stabilizers would be used for dust suppression. Residual pesticides are likely present in onsite soils, however, the Project's

proposed weed management and rodent control methods described in the Project's Pest Management Plan would not exacerbate them. Therefore, Project construction, operation, and maintenance, is not expected to impact the chemical composition of onsite soils.

Physical properties of soil include color, texture, structure, porosity, density, consistency, stability, and temperature. The Project proposes no changes that would affect soil color; however, grading would result in soil compaction throughout most of the Project site to provide a stable base for proposed structures, equipment, and roads. At the end of the Project's useful life, the Project will be decommissioned, and site restoration will take place following the Project's Reclamation Plan. Once the existing structures of the Project and ancillary facilities have been removed, site restoration activities will take place. The goal of site restoration is to restore the natural topography, vegetative cover, and hydrologic function of the site to a condition as close as possible to that of the site prior to the installation of the Project. The topsoil will be de-compacted and amended, as necessary, to match the density and consistency of the immediate surrounding area. The topsoil will be replaced to original depth, and the original surface contours reestablished, where possible. Any topsoil deficiency and trench settling will be mitigated with additional topsoil consistent with the quality of the affected site. Therefore, the soil compaction that would occur during construction and operation would be corrected during decommissioning, resulting in a less-than-significant impact to the physical properties of the Project site soil because, unlike an urban project (e.g., subdivision, shopping center), it would not affect the Project site's long-term suitability for agricultural use.

Project impacts on permeability and depth of the soil would be limited to construction grading activities and would be corrected during Project decommissioning and site restoration. The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years for the next 37 years. Once the Project is decommissioned and site restored, available water capacity would be the same as it is under pre-Project conditions.

The implementation of the Project's County-approved Reclamation Plan would ensure that the texture of surface soils are returned to a condition suitable for agricultural use. The Project site is and would remain generally flat.

The Project will be designed to reduce any impacts associated with drainage or erosion to less than significant and would comply with applicable laws and standards for the protection of the environment and any conditions of approval imposed by the County. This would further ensure that the Project would not adversely affect any of the environmental characteristics of the Project site that qualify it for mapping as Prime Farmland on the basis of its Storie Index Rating. Therefore, impacts related to the conversion of Prime Farmland to non-agricultural use would be less than significant.

7.2 Williamson Act Cancellation

The Project parcels are subject to Williamson Act Contracts and would be petitioned for cancellation by the landowners as part of the Project.

The percentage of land proposed for this cancellation represents a tiny percentage of the remaining acreage under Williamson Act Contracts in California and does not present a threat to the short- or

long-term agricultural production in California. As of 2021, the total acreage of contracted Williamson Act land in California is approximately 10 million acres (CDC 2022). As of 2016, approximately 1,421,579 acres, or about 39 percent of the County's assessed agricultural land, was under some form of Williamson Act Contract with Fresno County (Fresno County 2023). The Project site represents approximately 0.0001 percent of the State acreage and only around 0.0007 percent of the contracted area in Fresno County.

The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. With the removal of the Project site from the Williamson Act Contract, the site will no longer receive property tax assessments at reduced rates, generating increased tax revenues for the County.

Information required to support the Williamson Act Contract cancellation includes documentation of an applicant's efforts to search for available, suitable, proximate, and noncontracted land for the proposed use, and information explaining why noncontracted sites were not selected.

San Luis West Solar, LLC undertook an extensive search to find proximate non-contracted lands that were both available and suitable for the proposed use. San Luis West Solar, LLC has established criteria for site selection for solar development which reflect economic, environmental, and operational objectives. These criteria include:

- A substation with sufficient capacity must be available to provide a POI in reasonably close proximity to load centers (within 75–100 miles);
- The site must be located as close as possible to the PG&E Gates Substation, although sites up to 4 miles from the PG&E Gates Substation were considered;
- The site must be of sufficient size to support an economically viable utility-scale project. Combinations of contiguous parcels were considered;
- The land must have an open and relatively flat landscape (less than 15 percent slope across the majority of the site) and cannot contain any permanent structures that cannot be removed (e.g., housing, historic buildings, industrial facilities);
- The site has legal access and site control (either purchase or lease) and can be secured; and
- The site must not contain sensitive habitat.

San Luis West Solar, LLC began the search for proximate non-contracted land by first identifying a potential substation for the POI. This is a key criterion because substation facilities and gen-tie line upgrades can be extremely costly and have the potential to undermine a project's economic viability. Gen-tie line upgrade costs are largely passed onto the ratepayer over the life of the project; thus, connecting to a pre-existing substation with available capacity is in the public's best interest. The PG&E Gates Substation was selected as a potentially suitable substation for interconnection in Fresno County.

A search radius of up to 4 miles was set around the PG&E Gates Substation. Beyond this distance the high cost of construction of the gen-tie line between the solar facility and the substation would make

the Project economically infeasible. The search demonstrated that most of the lands within 4 miles of the PG&E Gates Substation are under a Williamson Act contract.

7.3 Project Benefits

The County may exempt discretionary land use projects from agricultural mitigation requirements if it finds that the loss of agricultural land caused by the proposed conversion is outweighed by specific overriding economic, legal, social, technological, or other benefits of the conversion, as contemplated by section 21081(b) of the Public Resources Code. As detailed below, many valuable public policies will benefit from the proposed Project, and these benefits can be realized without harming agricultural activities in the County.

Economic Benefits and Productive Use of Fresno County Land

The Project site landowners are providers of jobs and economic activity in Fresno County and intend to stay in the agriculture business for the foreseeable future. Converting a portion of the land holdings to solar energy use provides the site owners a stable revenue stream which will support the remainder of their existing agricultural operations.

The construction cost of the proposed Project will likely exceed $175 million, bringing an influx of construction jobs and indirect and induced economic benefits to the County. San Luis West Solar, LLC will make all reasonable efforts to establish a point of sale in Fresno County for equipment and construction related items and/or purchase products and equipment from local (Fresno County) manufacturing facilities and/or vendors. San Luis West Solar, LLC will also make all reasonable efforts to conduct local recruitment efforts and/or coordinate with employment agencies in an attempt to hire from the local workforce.

Removal of the acreage from the Williamson Act and conversion of the Project site to solar will bring in sales tax revenue and result in an increase in property tax to the County.

Climate Change, Greenhouse Gases, and Renewable Energy

The proposed Project would produce up to 125 MW of clean, renewable electricity and provide up to 30 MW of energy storage, which would contribute toward California's Senate Bill (SB) 100 goal of providing electricity 100 percent greenhouse gas (GHG) emissions free by 2045. The development of the proposed solar Project would address the public's concerns of energy security, global climate change, and the economy.

Agriculturally Compatible Use

The Project site is in Fresno County's AE-20 and AE-40 zones, which the County permits utility-scale solar energy uses with an UCUP. Solar energy facilities are therefore considered to be a compatible use. It is considered a possibility that solar energy facilities could eventually be removed, and the land returned to farming. Therefore, it is possible that the Project site could be returned to full agricultural use when the lease is ended.

The Project will not result in the removal of adjacent contracted land from agricultural use. Operation of the Project would not affect adjacent properties under Williamson Act land use contracts. The

Project would not result in indirect impacts on adjacent agricultural lands that could occur with the conversion of the site from agricultural uses to non-agricultural uses. This type of impact is mainly due to compatibility issues with the adjacent agricultural land still in production. These types of compatibility issues may include nuisance effects to a site from noise, dust, odors, and drift of agricultural chemicals. For incompatible adjacent uses, the adjacent agriculture uses could experience restrictions on the use of agricultural chemicals, complaints regarding noise and dust, and vandalism and pilfering of crops. These conflicts could potentially result in increased costs to the agricultural operation and encourage conversion of additional agricultural lands to urban uses. The Project would not result in this type of indirect impact; operation and maintenance activities associated with solar facilities are minimal. Once constructed, the Project would be operated remotely, seven days per week and 365 days per year. The Project will be outfitted with a suite of sensors, monitoring equipment, and communications gear as part of the Project's SCADA system. On-site O&M activities will consist of responding to abnormal operating conditions, routine maintenance and repairs, periodic panel washing, and grounds maintenance (i.e., vegetation control). These activities are anticipated to require site visits on the order of once to twice per month, consisting of a small ground crew. Operation of the Project would not result in an increase in employment that would require the construction of new housing, and therefore, is not expected to encourage urban development. The Project would be compatible with the surrounding agricultural uses and is not expected to affect the agricultural use of the adjacent parcels.

7.4 Project Site Buffers

The lands surrounding the Project site are active agricultural facilities. The Project will need to adopt weed and pest management practices and safety measures that would contribute to the maintenance of the integrity of the larger farming community. Implementing good neighbor practices will ensure that the public benefits from the Project are not eroded by any unintended negative consequences.

The Project would include the development and adherence to a Pest Management Plan on the Project site to ensure that the Project site does not harbor pests or vectors that could interfere with the surrounding agricultural uses. San Luis West Solar, LLC would implement practices that would effectively manage weeds and pest populations while minimizing any adverse environmental impacts to the greatest extent possible.

The following additional protective measures will be incorporated into and implemented by the Project in order to ensure compatibility with surrounding agricultural uses:

- The Project will be buffered on all sides by a minimum of 50 feet.
- The solar array perimeter would be bordered by a 6- to 8-foot-tall woven wire or chain link fence. This type of fence would provide necessary security for the Project while also being friendly to wildlife. A locked security gate would be located at the site entrance.
- The Project would be developed so there is no net increase in off-site drainage flows, including peak flows during a storm event.

Decommissioning of the Project would not be undertaken for more than three decades, and a detailed Reclamation Plan would be prepared. The Project would be constructed and decommissioned in such

a way that the site could be returned to agricultural capability. Site reclamation would include the following steps:

- Dismantling and removing all above- and below-ground equipment, cabling, posts, and foundations.
- On-site roads will remain in place to accomplish reclamation. At the time of reclamation, if the landowner determines that some of these roads will be beneficial for future use of the site, those roads may remain after reclamation. Roads that will not be re-used will be restored to preconstruction conditions.
- If soils are significantly compacted, they will be restored using a disking method. The ground surface will be restored and revegetated to pre-construction conditions.
- Solar panels and other equipment removed during the decommissioning process would be reused or recycled as appropriate.

7.5 Compliance with the County's Right to Farm Ordinance Project Site Buffers

San Luis West Solar, LLC will comply with County requirements associated with County's right to farm ordinance. San Luis West Solar, LLC understands that farming is the primary land use and activity in the region. San Luis West Solar, LLC is committed to working cooperatively with farming operations in the vicinity of the Project site to ensure that the Project would be a compatible use within the surrounding agricultural landscape.

7.6 Compliance with the County's Solar Facilities Guidelines

Location of discussions addressing the County's Solar Facilities Guidelines are shown in Table

Guideline	Location Addressed
1) Historical agricultural operational/usage	Sec. 2.2
2) Source of water for the subject parcel	Sec. 4.5, Water Supply Assessment (Tetra Tech 2024b)
3) Parcel status	Sec. 4.3
4) Current soil type and mapping units	Sec. 4.4
5) Buffer measures	Sec. 7.4
6) Reclamation Plan	Sec. 7.4
7) Search to find proximate non-contracted lands	Sec. 7.2
8) Pest management plan	Sec. 7.4
9) Acknowledge the County's Right to Farm Ordinance	Sec. 7.5
10) Life of the approved land use permit	Sec. 2.0
11) Fresno County point of sale	Sec. 7.3
12) Local employment	Sec. 7.3
13) Impacts to roads	Traffic Impact Analysis (Tetra Tech 2024c)
14) Purchase products in Fresno County	Sec. 7.3

7.7 Summary of Farmland Conversion Assessment

Cancellation of a Williamson Act contract may be made only if it makes one of the following required statutory findings (Government Code Section 51282(a)):

Condition	Project Consistency
1. That the cancellation is consistent with the purposes of Section 51282. Cancellation of a contract is consistent if the board or council makes all of the following findings:	
1) That the cancellation is for land on which a notice of nonrenewal has been served pursuant to Section 51245.	Consistent - The Project parcels are subject to Williamson Act Contracts and would be petitioned for cancellation by the landowners as part of the Project, see Section 7.2.
2) That cancellation is not likely to result in the removal of adjacent lands from agricultural use.	Consistent - The Project will not result in the removal of adjacent contracted land from agricultural or open space use, see Section 7.3.
3) That cancellation is for an alternative use which is consistent with the applicable provisions of the city or county general plan.	Consistent - The Project is within the "AE-20" and "AE-40" zoning districts. Within these zoning districts, the County permits utility-scale solar energy uses with an Unclassified Conditional Use Permit (UCUP), see Section 3.5. Project approval includes approval of a UCUP.
4) That cancellation will not result in discontiguous patterns of urban development.	Consistent - The Project would be compatible with the surrounding agricultural uses and is not expected to encourage urban development, see Section 7.3.
5) That there is no proximate noncontracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or, that development of the contracted land would provide more contiguous patterns of urban development than development of proximate noncontracted land.	Consistent - There is no proximate noncontracted land which is both available and suitable for Project use, see Section 7.2.
2. That cancellation is in the public interest. Cancellation of a contract is in the public interest if the council or board makes the following findings:	
1) that other public concerns substantially outweigh the objectives of this chapter;	Consistent - Many valuable public policies will benefit from the proposed Project, and these benefits can be realized without harming agricultural activities in the County, see Section

	7.3.
2) that there is no proximate noncontracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or that development of the contracted land would provide more contiguous patterns of urban development than development of proximate noncontracted land.	Consistent - There is no proximate noncontracted land which is both available and suitable for Project use, see Section 7.2.

8.0 REFERENCES

CDC (California Department of Conservation). 1997. California Agricultural Land Evaluation and Site Assessment Model (LESA) Instruction Manuel, 1997. Available online at: https://www.conservation.ca.gov/dlrp/Documents/lesamodl.pdf. Accessed March 2024.

CDC. 2022. The Williamson Act: 2020-21 Status Report. Available online at: https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2022%20WA%20Status%20Report.pdf. Accessed March 2024.

CDC. 2023. Solar Power and the Williamson Act. Available online at: https://www.conservation.ca.gov/dlrp/wa/Documents/lrcc/WA%20Solar%20Power%202023.pdf. Accessed September 2024.

CDC. 2024a. Alternative Fresno County 2018–2020 Land Use Conversion, Table A-8. Available online at: https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/pubs/2018-2020/Alternate_Conversion_tables/Alternate_Fresno_County_2018-2020_Land_Use_and_Rural_Conversion.pdf Accessed March 2024.

CDC. 2024b. Farmland Mapping and Monitoring Program. Available online at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed March 2024.

County of Fresno. 2017. County of Fresno Solar Facility Guidelines. Revised by Board of Supervisors December 12, 2017. https://www.fresnocountyca.gov/Departments/Public-Works-and-Planning/divisions-of-public-works-and-planning/development-services-division/planning-and-land-use/photovoltaic-facilities-p-1583/photovoltaic-facilities-p-1621. Accessed March 2024.

County of Fresno. 2023. Fresno County General Plan Background Report. https://www.fresnocountyca.gov/files/sharedassets/county/v/2/public-works-and-planning/development-services/planning-and-land-use/general-plan/fcgpr-background-report-2023-05-10.pdf. Accessed March 2024.

County of Fresno. 2024. Fresno County General Plan. https://www.fresnocountyca.gov/Departments/Public-Works-and-Planning/divisions-of-

public-works-and-planning/development-services-division/planning-and-land-use/general-plan-review-zoning-ordinance-update. Accessed March 2024.

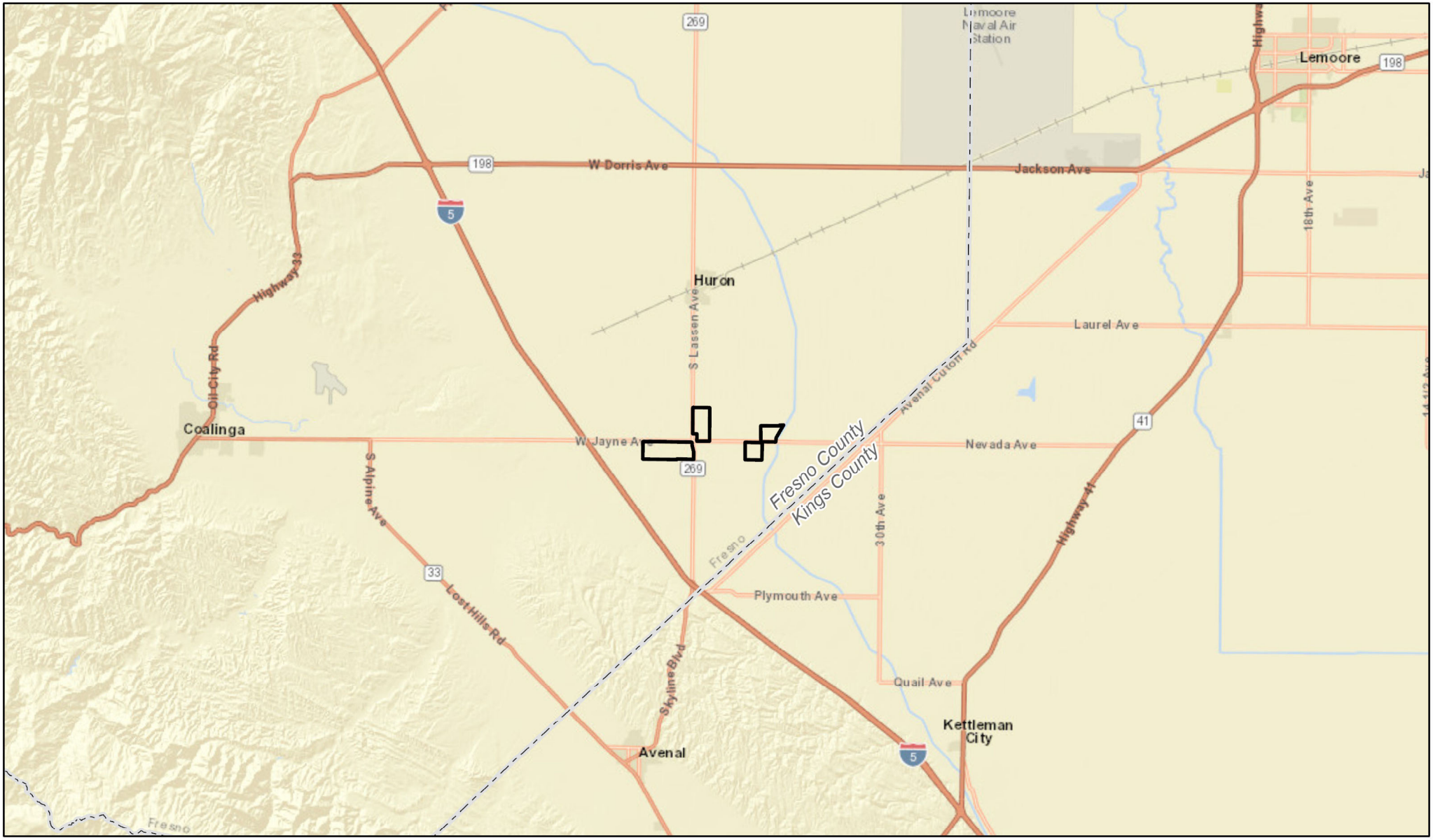
Tetra Tech. 2024a. Negative Phase I Archaeological Survey Report for the San Luis West Solar Project. March 2024.

Tetra Tech. 2024b. Water Supply Assessment for the San Luis West Solar Project. March 2024.

Tetra Tech. 2024c. Traffic Impact Analysis for the San Luis West Solar Project. September 2024.

USDA-NRCS (U.S. Department of Agriculture-Natural Resources Conservation Service). 2021. United States Department of Agriculture. Web Soil Survey. Available online at: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm.Accessed March 2024.

FIGURES





Project Site

N

0 2 4

Miles

Source: ESRI (2024)

NOT FOR CONSTRUCTION

TETRA TECH

Figure 1
Project Vicinity

San Luis West Solar Project
Fresno County, California

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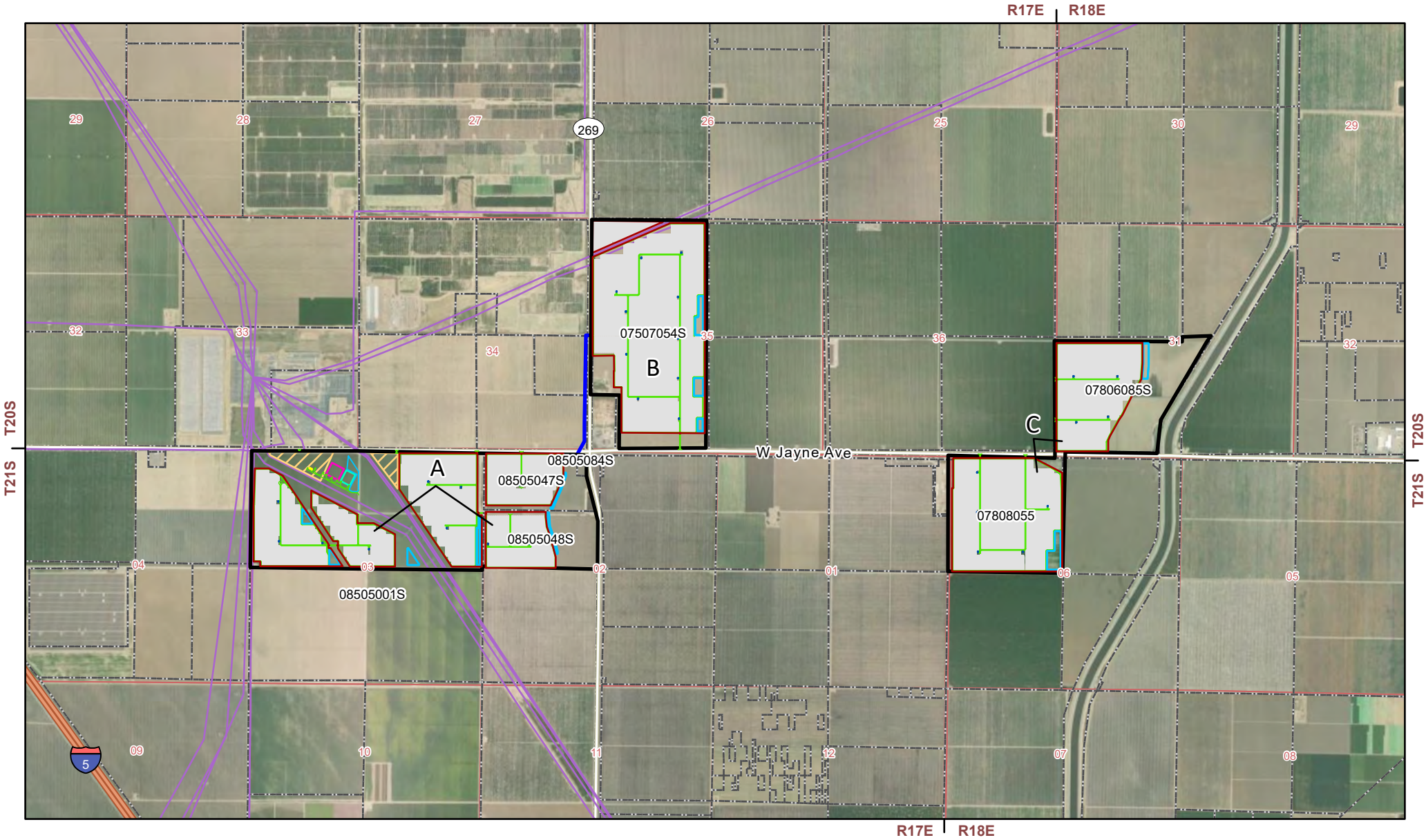



Project Site
Array
Inverters
O&M Building
Substation
BESS
Site Fence
Site Road
Basin
Collection Line
Laydown
Existing Transmission Line
Township/Range
Section
Parcels

N

0 0.25 0.5
Miles

Source: ESRI (2024)

NOT FOR CONSTRUCTION

TETRA TECH

Figure 2
Project Layout

San Luis West Solar Project
Fresno County, California

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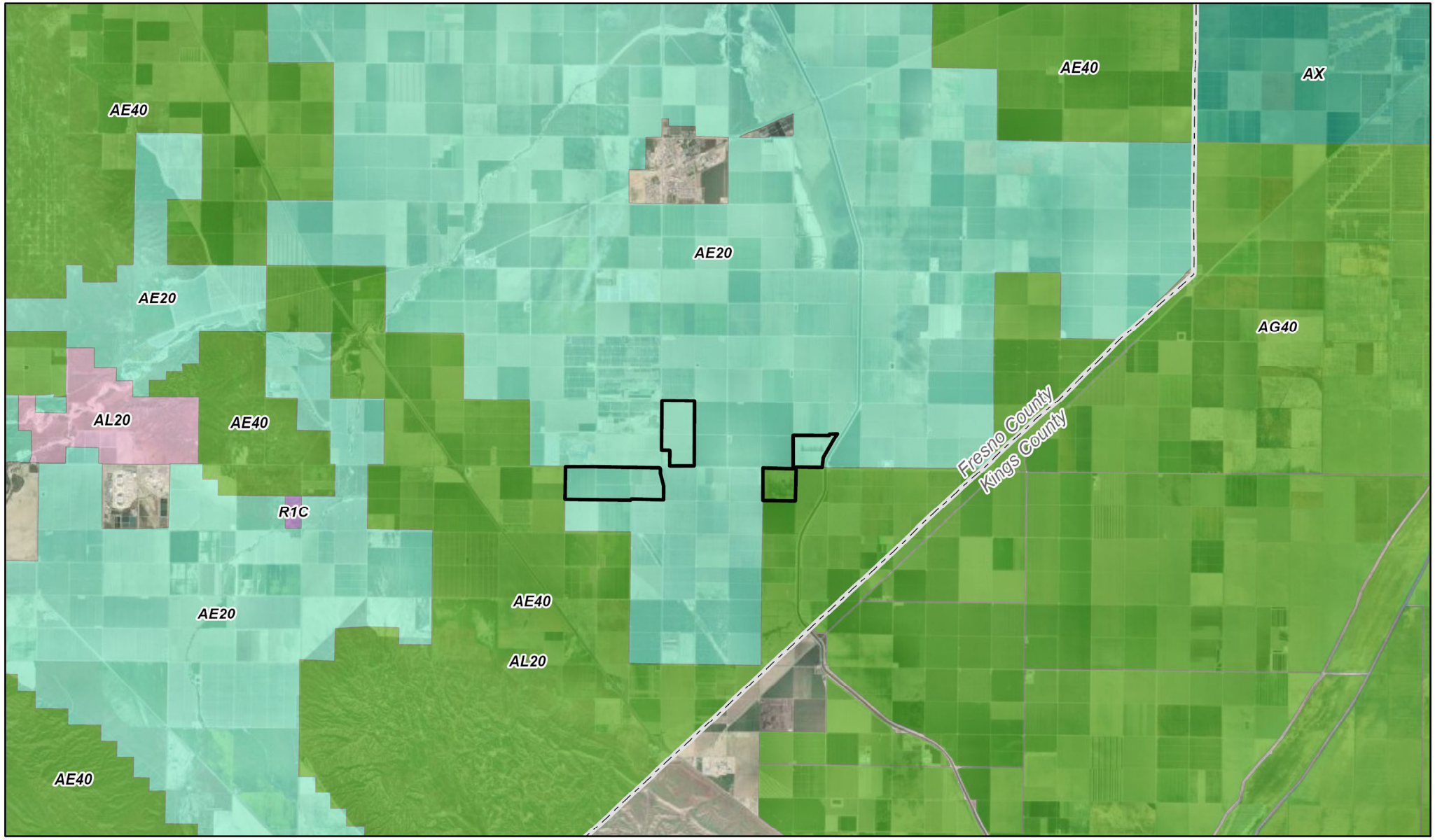



Project Site

Fresno County Zoning

- AE20 - Exclusive Agriculture (20 acres)
- AE40 - Exclusive Agriculture (40 acres)
- AL20 - Limited Agriculture (20 acres)
- R1C - Single Family Residential

Kings County Zoning

- AG40 - General Agricultural (40 acres)
- AX - Exclusive Agricultural

N

0 1 2

Miles

Source: ESRI (2024), Fresno County (2023)

NOT FOR CONSTRUCTION

TETRA TECH

Figure 3
Zoning

San Luis West Solar Project
Fresno County, California

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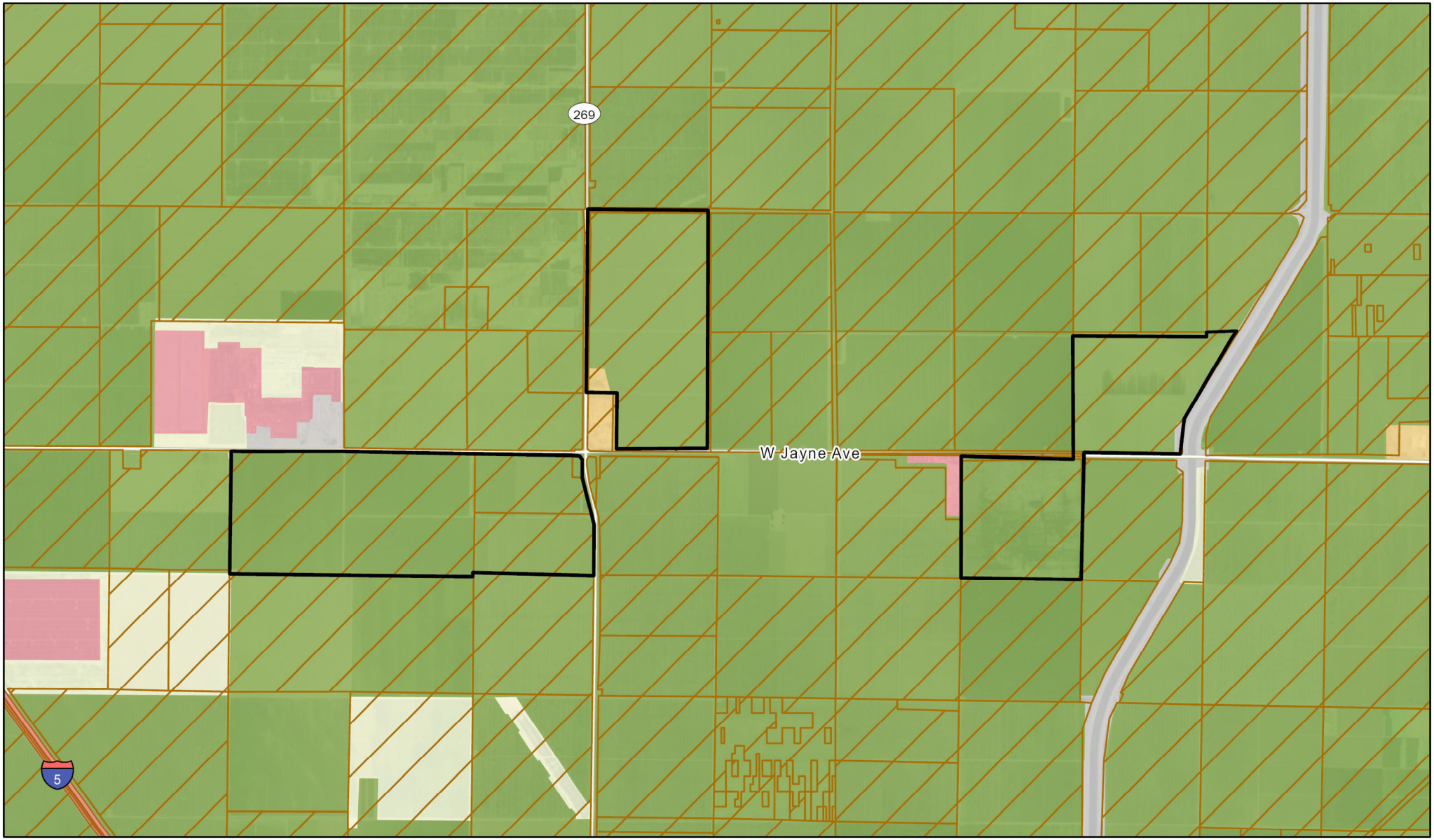



Project Site
Williamson Act Parcel
Prime Farmland
Farmland of Local Importance
Vacant or Disturbed Land
Semi-agricultural and Rural Commercial Land
Urban and Built-Up Land

N

0 0.5 1
Miles

Source: ESRI (2024), CA DLRP (2023)

NOT FOR CONSTRUCTION

TETRA TECH

Figure 4
Important Farmland Designations/ Williamson Act Contract

San Luis West Solar Project
Fresno County, California

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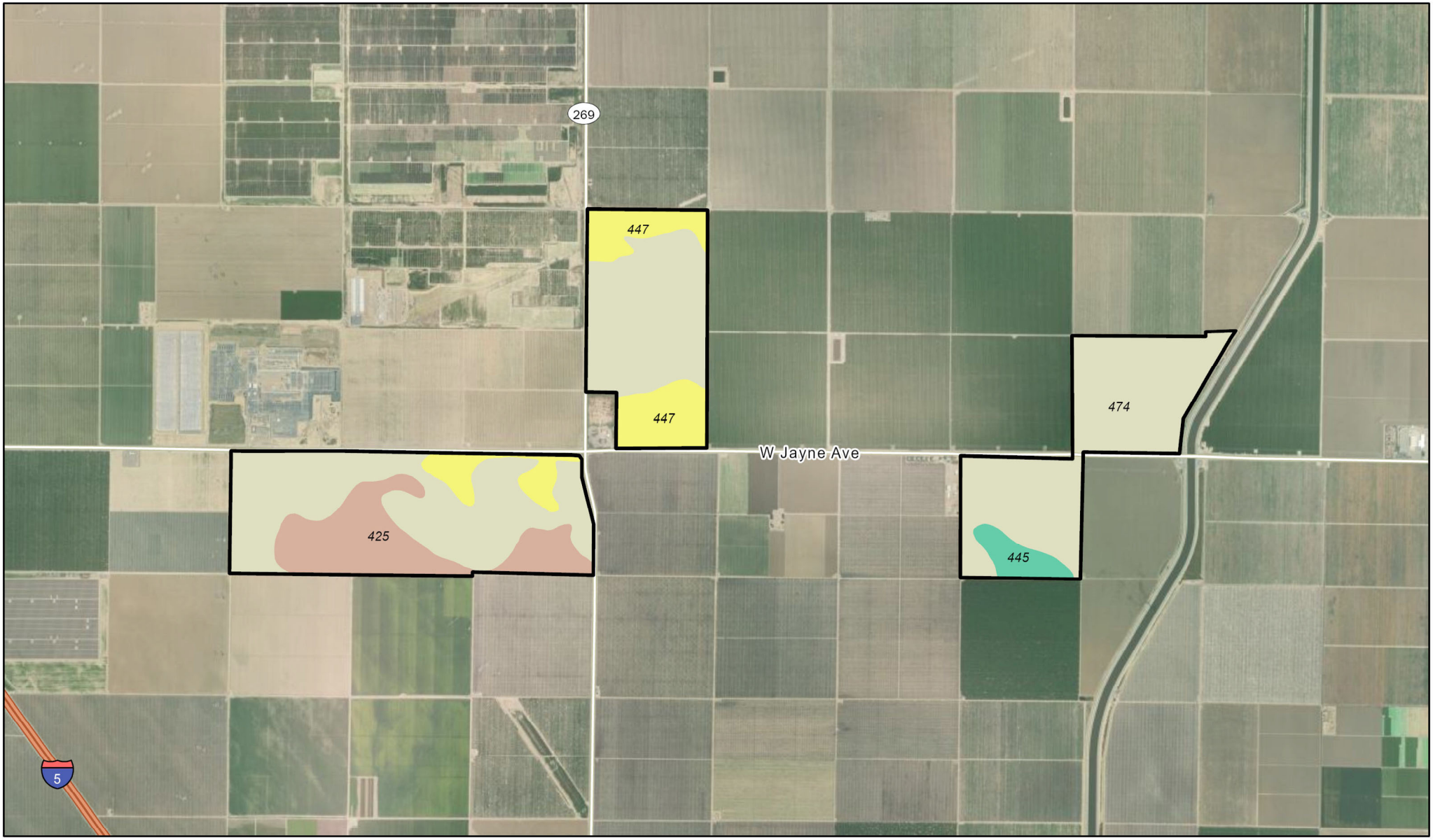



Project Site

Soil Unit

425: Kimberlina sandy loam, 0 to 2 percent slopes

445: Excelsior sandy loam, 0 to 2 percent slopes

447: Excelsior sandy loam, sandy substratum, 0 to 2 percent slopes

474: Westhaven loam, 0 to 2 percent slopes

N

0 0.5 1

Miles

Source: ESRI (2024), NRCS (2023)

NOT FOR CONSTRUCTION

TETRA TECH

Figure 5
Soils

San Luis West Solar Project

Fresno County, California

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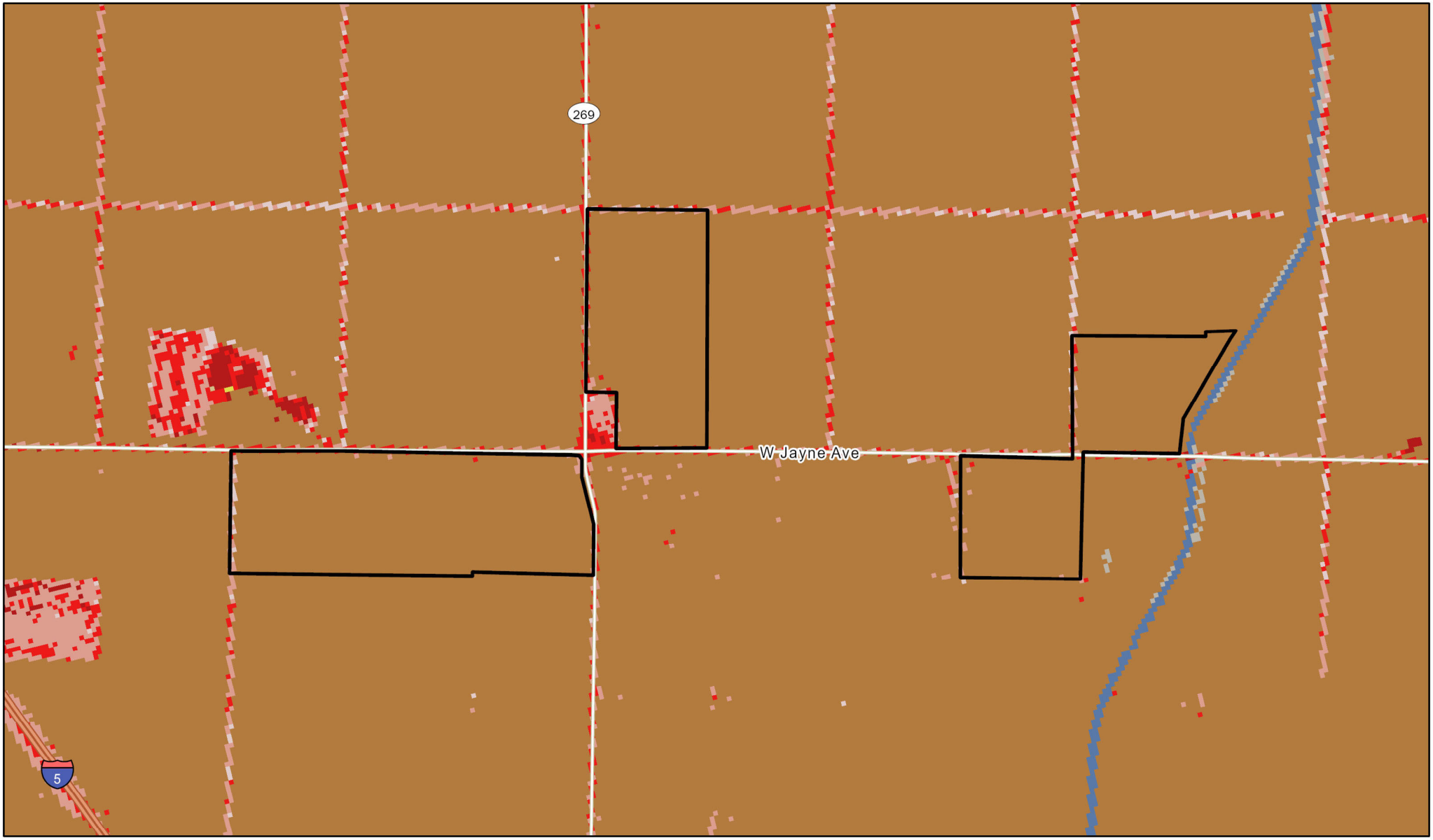



Project Site

NLCD Land Cover

- Open Water
- Developed, Open Space
- Developed, Low Intensity
- Developed, Medium Intensity
- Developed, High Intensity
- Barren Land
- Shrub/Scrub
- Pasture/Hay
- Cultivated Crops

N

0 0.5 1

Miles

Source: NLCD (2021)

NOT FOR CONSTRUCTION

TETRA TECH

Figure 6
Land Cover

San Luis West Solar Project
Fresno County, California

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