

C.3 Agriculture

This section analyzes whether the Revised Project and PG&E Upgrades would result in any new significant impacts to agriculture that were not previously identified and disclosed in the 2010 Final EIR, or whether there would be a substantial increase in the severity of any previously identified impacts to agriculture. As part of this analysis, the section considers changes to the agricultural lands and activities in the study area, changes to the development footprint of the project, and changes to potential agricultural impacts and mitigation measures.

Data sources that were used for this analysis include farmland data from the California Department of Conservation (DOC, 2013, 2014a, 2014b), soil survey data from the Natural Resources Conservation Service (NRCS, 2014), and agricultural data from the California Department of Food and Agriculture and Fresno County (CDFA, 2013; Fresno County, 2012).

C.3.1 Environmental Setting

The following section describes changes to the environmental setting that have occurred since 2010. Section C.3.1.1 describes any changes to the environmental setting that was presented in the 2010 Final EIR. Section C.3.1.2 describes the environmental setting for the area surrounding the PG&E Upgrades.

C.3.1.1 Revised Solar Project

The agricultural environmental setting for the Revised Project site has remained substantially unchanged since approval of the 2010 Final EIR. Panoche Valley remains generally undeveloped and pastoral in character. No new development has occurred, and no major new structures have been built in the valley. Grazing remains the primary land use in the area. The previous Williamson Act contracts on and adjacent to the project site were approved for cancellation in 2010. As shown on Figure C.3-1 (at the end of this section), the project site is surrounded by agricultural land that is enrolled in Williamson Act contracts. While there are remaining Williamson Act contracts affected by the proposed project, these contracts are approved for cancellation.

The California Department of Conservation's Farmland Mapping and Monitoring Program (DOC FMMP) identifies Important Farmland throughout California based on both current use and soil quality. In order to be classified as Prime Farmland or Farmland of Statewide Importance by FMMP, land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. As noted in the 2010 Final EIR the FMMP classifies the entire project area as Grazing Land. This classification has not changed and reflects the current grazing use of the site.

In 2010, most of the land nearby the project site was used for grazing cattle, except for a limited amount of orchards, vineyards, and field crops within approximately a mile of the southeast portion of the project site. These same agricultural activities continue in 2014. Most of the surrounding agricultural operations continue to rely on rotational grazing and dry farming (Williams, pers. comm., 2010; McCormick, pers. comm., 2014). The Revised Project would be approximately 4,770 feet northwest of farmland designated as Prime Farmland and approximately 5,700 feet northwest of farmland designated as Unique Farmland. The project boundary is more than 5 miles east of Farmland of Local Importance. Figure C.3-2 shows FMMP designations near the project site.

In addition to using the FMMP designation the 2010 Final EIR identified soil types, which have not changed. Project site soil types were identified and assessed based on the California Revised Storie Index, Land Capability Class, and United States Department of Agricultural Natural Resources Conserva-

tion Service (USDA NRCS) Classification. Table C.3-1 (Panoche Valley Solar Soil Types and Agricultural Classifications) shows the soil types present on the project site and whether they are considered Prime agricultural soils based on Storie Index, Land Capability Class, and NRCS Classification.

Table C.3-1. Panoche Valley Solar Soil Types and Agricultural Classifications

Name (Map Unit Symbol)	California Revised Storie Index	Land Capability Class		NRCS Prime Farmland Classification	Prime Soil?
		Non-Irrigated	Irrigated		
Gullied lands (GuE)	Not Rated	8	—	Not Prime Farmland	No
Kettleman loam, 15-50% slopes (KeF2)	Grade Three-Fair	6	—	Not Prime Farmland	No
Los Banos clay loam, 2-9% slopes (LuC)	Grade One-Excellent	4	2	Farmland of Statewide Importance	Yes
Los Banos clay loam, 15-50% slopes, severely eroded (LuF3)	Grade Two-Good	6	—	Not Prime Farmland	No
Panhill loam, 2-9% slopes (PhC)	Grade One-Excellent	4	2	Farmland of Statewide Importance	Yes
Panoche sandy loam, 0-2% slopes (PkA)	Grade One-Excellent	4	1	Prime Farmland if Irrigated	Yes
Panoche sandy loam, 2-9% slopes (PkC)	Grade One-Excellent	4	2	Prime Farmland if Irrigated	Yes
Panoche loam, 0-2% slopes (PIA)	Grade One-Excellent	4	1	Prime Farmland if Irrigated	Yes
Panoche loam, 2-9% slopes (PIC)	Grade One-Excellent	4	2	Prime Farmland if Irrigated	Yes
Riverwash (Rw)	Not Rated	8	—	Not Prime Farmland	No
Shedd loam, 15-30% slopes, eroded (ShE2)	Grade Three-Fair	4	4	Not Prime Farmland	No
Vallecitos rocky loam, 30-50% slopes, eroded (VrF2)	Grade Four-Poor	6	—	Not Prime Farmland	No
Yolo loam, 2-9% slopes (YoC)	Grade One-Excellent	3	2	Prime Farmland if Irrigated	Yes
Yolo gravelly loam, 0-5% slopes (YvB)	Grade Three – Fair	3	2	Prime Farmland if Irrigated	Yes

Table C.3-2 shows a comparison of the soil classifications for the project boundary from the 2010 Final EIR and the project boundary for the Revised Project.

Table C.3-2. Panoche Valley Solar Soil Classification for 2010 Final EIR and 2014 Revised Project

Soil Classification	2010 Final EIR		2014 Revised Project	
	Acres	Percentage	Acres	Percentage
Storie Index				
Grade One – Excellent	4,255.9	87%	2,430.4	97%
Grade Two – Good	6.5	0.1%	7.0	0.3%
Grade Three – Fair	471.66	9.7%	56.4	2.3%
Grade Four – Poor	10.2	0.2%	10.1	0.4%
Null or Not Rated	141.5	3%	2.1	0.1%
Total	4,885.7	100%	2,506	100%

Table C.3-2. Panoche Valley Solar Soil Classification for 2010 Final EIR and 2014 Revised Project

Soil Classification	2010 Final EIR		2014 Revised Project	
	Acres	Percentage	Acres	Percentage
Land Capability Class and Subclass (Non-Irrigated)¹				
3e	469.6	9.6%	424.3	16.9%
4e	4,237.8	86.8%	2,048.0	81.8%
6e	36.8	0.8%	31.6	1.3%
8e/w	141.5	2.9%	2.1	0.1%
Total	4,885.7	100%	2,506	100%
NRCS Farmland Classification				
Prime Farmland if Irrigated	4,058.2	83%	2,163.8	86.3%
Farmland of Statewide Importance	629.4	13%	266.6	10.7%
Not Prime Farmland*	198.1	4%	75.6	3.1%
Total	4,885.7	100%	2,506	100%

1 - Capability subclasses are designated by adding a small letter, e, w, s, or c, to the class numeral, for example, 2e. The letter e shows that the main hazard is the risk of erosion unless close-growing plant cover is maintained; w shows that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage); s shows that the soil is limited mainly because it is shallow, droughty, or stony; and c, used in only some parts of the United States, shows that the chief limitation is climate that is very cold or very dry (NRCS, 2014).

Source: Web Soil Survey, NRCS, 2014.

* - Not Prime Farmland designation primarily consists of Class 6 and 7 soils, which are characterized by severe limitations that make them generally unsuitable for cultivation and restrict their use mainly to grazing, pasture, and rangeland (NRCS, 2010b). For more detail about NRCS farmland classification categories, see NRCS – National Soil Survey Handbook Part 622: <http://soils.usda.gov/technical/handbook/contents/part622.html>. Source: Soil Survey Staff, NRCS, 2010.

Williamson Act

At the time of the 2010 Final EIR, nearly the entire originally proposed project site was enrolled in Williamson Act contracts. The Board approved cancellation of these contracts, totaling 6,953 acres in October 2010. The acreage approved for cancellation exceeded the acreage within the project boundary because several of the Williamson Act contracts extended outside the project boundary, but were not eligible for partial cancellation. Of the total acreage cancelled, 4,302 acres were classified as Prime by the County and 2,651 acres were classified as Non-Prime. All of the land subject to the Williamson Act cancellations was used solely for cattle grazing and not for field crop production.

C.3.1.2 PG&E Upgrades

The proposed PG&E Upgrades would be located in San Benito County (7 miles) and Fresno County (10 miles). A portion of the PG&E ROW is on BLM land (2.3 miles in San Benito County and 4.1 miles in Fresno County).

Most of the PG&E work would consist of overhead installation of OPGW on existing transmission towers. However, an existing 230 kV transmission line crosses under two existing 500 kV transmission lines 1.5 miles west of the I-5 crossing. At this location, upgrades would require installation of approximately 9 permanent wooden poles (10 square feet total) over a 4,650-foot section of transmission line. The new poles would be installed within the existing PG&E ROW on agricultural land. PG&E Upgrades would also require installation of microwave towers and eight new transmission structures that are required to tie the existing Moss Landing–Panoche 230 kV transmission line into the proposed PG&E switchyard located within the Revised Project site boundaries, as described in Section B (Project Description). The new transmission structures would be installed by PG&E after site preparation is completed by the Applicant.

Table C.3-3 shows the overlap of permanent structures from the PG&E Upgrades with FMMP-designated agricultural land.

Table C.3-3. PG&E Upgrades: Permanent Structures on FMMP-Designated Farmland

FMMP Designation	Wood Poles (Permanent Impact)	Microwave Sites (Permanent Impact)
P-Prime Farmland	6.66 square feet (6 poles)	N/A
G-Grazing Land	3.33 square feet (3 poles)	0.23 acres (10,019 square feet)
Total	10 square feet	0.23 acres (10,019 square feet)

The site of the Helms Substation microwave tower is designated as Urban and Built-Up Land by the FMMP, which is not considered a farmland category and is, therefore, not included in Table C.3-3. The Panoche Mountain microwave tower site is designated as Grazing Land. There would be 6 wood poles on Prime Farmland, and 3 wood poles on Grazing Land. The affected Prime Farmland is currently being used for farming pomegranates.

The PG&E ROW supports agricultural production (vineyards and crop production) as well as rangeland/grazing land. The PG&E ROW is similar to the project site and the setting presented in the 2010 Final EIR. The surrounding land uses are used for agricultural operations such as; vineyards, orchards, and field crops as well as cattle grazing along the western portion of the alignment in San Benito County. See Figure C.3-3 for an overview of FMMP designations along the PG&E ROW and at the microwave tower sites. PG&E's ROW passes through approximately 5 miles of Williamson Act lands in San Benito County and approximately 4.4 miles of Williamson Act land in Fresno County.

San Benito County

Seven miles of the affected PG&E ROW are in San Benito County, as is the proposed microwave tower on Call Mountain, which is approximately 9 miles west of the solar project site. A general description of agricultural land in San Benito County is included in Section C.3.1.1 (Solar Project: Changes to Environmental Setting since Project Approval) and in the 2010 Final EIR. All of the PG&E Upgrades in San Benito County would occur on land zoned for agricultural use. A small amount, 58.9 acres, of land designated as Prime Farmland and another 8.1 acres designated as Unique Farmland are located within 1 mile of the PG&E OPGW upgrades in San Benito County. No FMMP-designated Important Farmland exists within 1 mile of either the Call Mountain or Panoche Mountain microwave towers. Within San Benito County, there are no FMMP designated Prime Farmlands, Unique Farmlands, or Farmlands of Local Importance within 0.25 miles of the PG&E ROW, or the microwave tower site at Call Mountain.

Fresno County

Ten miles of the proposed PG&E Upgrades would be located in the San Joaquin Valley in western Fresno County, as would the Panoche Mountain microwave tower. Several categories of FMMP Important Farmland are located within 1 mile of the PG&E OPGW upgrades in Fresno County, including 5,394.8 acres of Prime Farmland, 44.2 acres of Farmland of Statewide Importance, 27.5 acres of Unique Farmland, and 89.0 acres of Farmland of Local Importance. In addition, several categories of FMMP Important Farmland are located within 1 mile of the proposed microwave tower at Helm Substation in Fresno County, including 128.1 acres of Prime Farmland, 1,236.5 acres of Farmland of Statewide Importance, and 452.2 acres of Unique Farmland. Within the portion of the PG&E ROW and microwave tower sites located in Fresno County, approximately 2.35 acres are designated as Prime Farmland, 0.13 acres is des-

ignated Farmland of Local Importance. The remaining areas are designated as Grazing Land (1.27 acres), Urban and Built-Up Land (1.13 acres), and Vacant or Disturbed Land (0.60 acres).

Agriculture dominates Fresno’s economy. Fresno County has ranked first in the nation based on the gross value of its agricultural production since the 1950s (Fresno County General Plan, 2014; Fresno County Crop Report, 2012). In 2012, the value of the County’s agriculture was \$6.58 billion. The County’s top four agricultural commodities are almonds, livestock, grapes, and milk (CDFA, 2013). The value of the County’s top 10 leading crops is shown in Table C.3-4.

Table C.3-4. Fresno County Top 10 Crops

Crop	2012 Rank	2012 Dollar Value
Grapes	1	\$1,106,081,000
Almonds	2	\$952,056,000
Poultry	3	\$728,503,000
Milk	4	\$450,064,000
Tomato	5	\$433,700,000
Cattle and Calves	6	\$380,309,000
Cotton	7	\$272,379,000
Pistachios	8	\$195,969,000
Peach	9	\$169,861,000
Plum	10	\$144,909,000
Total for Top Ten		\$4,883,849,000

Source: Fresno County Crop Report, 2013.

As of 2012, there were approximately 1.5 million acres of Williamson Act lands in Fresno County (DOC, 2013).

BLM Land

Over 6 miles of the proposed PG&E Upgrades and the Panoche microwave tower would occur on lands managed by the BLM. These lands are managed as Grazing Land under the supervision of the BLM Hollister Field Office.

C.3.2 Applicable Regulations, Plans, and Standards

The applicable regulations, plans, and standards that apply to the assessment of agriculture impacts at the state and federal level and within the San Benito County portion of the project area are presented in Section C.3.2 of the 2010 Final EIR. Because a portion of the PG&E ROW traverses BLM lands and Fresno County, relevant Fresno County policies and BLM policies are discussed below.

BLM Land Management Policies

Federal Land Policy and Management Act (FLPMA) of 1976. FLPMA is the BLM’s “organic act,” which establishes the agency’s multiple-use mandate. FLPMA was enacted to establish a unified, comprehensive, and systematic approach to managing and preserving public lands in a way that protects “the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values.” In the context of the FLPMA, public lands consist of federally owned lands that have not been set aside for national forests and parks, wildlife preservation areas, military bases, or other federal purposes. Under FLPMA, the BLM is required to establish a planning process for the management of public lands that accommodates multiple uses of the land and its resources and achieves sustained yields of natural resources.

Central California Standards for Rangeland Health and Guidelines for Livestock Grazing Management (BLM, 1999). These standards for rangeland health are intended to accomplish the following goals: (1) Watersheds are properly functioning; (2) Ecological processes are in order; (3) Water quality complies with State standards; and (4) Habitats of special-status species are protected.

Fresno County Agricultural Policies

The Fresno County 2000 General Plan includes the following goals and policies related to agricultural resources:

- **Agricultural Land Use Designation.** This designation provides for the production of crops and livestock, and for location of necessary agriculture commercial centers, agricultural processing facilities, and certain non-agricultural activities.
- **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.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 listed in Table LU-3. Approval of these and similar uses in areas designated Agriculture shall be subject to listed criteria.
- **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 nonagricultural uses and adjacent agricultural operations.
- **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.
- **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.
- **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.20 (Water Resources).** The County shall adopt and support policies and programs that seek to protect and enhance surface water and groundwater resources critical to agriculture.
- **LU-B.1 (Westside Rangeland Purpose).** The County shall maintain areas designated Westside Rangeland for grazing and other appropriate open space uses and shall direct development to areas specifically planned for more intensive uses.
- **LU-B.2 (Allowed Uses).** The County shall allow by right in areas designated Westside Rangeland, grazing and other agricultural activities related to the production of food and fiber and support uses incidental and secondary to the onsite agricultural operations.
- **LU-B.3 (Discretionary Uses).** The County may allow by discretionary permit in areas designated Westside Rangeland special agricultural uses and agriculturally related activities, and certain non-agricultural uses. Approval uses in areas designated Westside Rangeland shall be subject to listed criteria.

- **LU-B.10 (Scenic Rangelands Protection).** The County shall require that new development requiring a County discretionary permit be planned and designed to maintain the scenic open space character of rangelands including view corridors of highways. New development shall use natural landforms and vegetation in the least visually disruptive way possible, and use design, construction and maintenance techniques that minimize the visibility of structures on hillsides, ridgelines, steep slopes, and canyons.

C.3.3 Environmental Impacts and Mitigation Measures

This section addresses whether the changes to the Approved Project would result in a new significant agricultural impacts or increase the severity of previously identified agricultural impacts. Section C.3.3.1 restates the significance criteria used in 2010 to determine whether any project changes result in any new or more severe significant impacts. Section C.3.3.2 summarizes the impacts and mitigation measures presented in the 2010 Final EIR for ease of reference. Section C.3.3.3 presents the updated impact analysis for the Revised Project, and Section C.3.3.4 addresses the impacts of a proposed change in a previously adopted APM. Section C.3.3.5 addresses the environmental impacts that would occur as a result of the PG&E Upgrades, and Section C.3.3.6 describes cumulative impacts.

C.3.3.1 Significance Criteria

The following significance criteria for agriculture were derived from the Environmental Checklist in CEQA Appendix G. These significance criteria were used for the 2010 Final EIR and are also applied to this SEIR. They have been amended or supplemented, as appropriate, to address the nature of solar photovoltaic (PV) facilities and transmission line upgrades in general, and the full range of potential impacts related to this Revised Project in particular. An impact of the Revised Project and PG&E Upgrades would be considered significant and would require mitigation if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared by the DOC's FMMP, to non-agricultural use
- Conflict with Williamson Act contracts, existing zoning for agricultural use, or objectives in the County General Plan's Agriculture and Conservation and Open Space Elements
- Involve other changes in the existing environment which, due to their location or nature, could impair agricultural use of nearby properties

Significance conclusions are presented regarding the significance of each identified agriculture impact, per the significance classification system provided in Section C.1 (Introduction to Environmental Analysis).

C.3.3.2 Approved Project Impacts and Mitigation Measures

Table C.3-5 presents a summary of the impacts and mitigation measures applicable to the Approved Project.

Table C.3-5. Summary of Impacts and Mitigation: Agriculture

Impact No. and Text	Mitigation Required	CEQA Conclusion
Impact AG-1: Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared by the Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (FMMP), to non-agricultural use.	MM BR-G.3: Development and implementation of a Habitat Restoration and Revegetation Plan. MM BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources. MM BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan for mitigation lands. MM BR-1.2: Develop and implement a Grazing Plan for the project site.	Class II
Impact AG-2: Project would conflict with Williamson Act contracts, existing zoning for agricultural use, or objectives in the County General Plan's Agriculture and Conservation and Open Space Elements.	MM AG-2.1: Create agricultural conservation easement(s). MM BR-1.2: Develop and implement a Grazing Plan for the project site. MM BR-G.3: Development and implementation of a Habitat Restoration and Revegetation Plan. MM BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources. MM BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan for mitigation land.	Class II
Impact AG-3: Construction and operation of project would impair agricultural use of nearby properties.	MM AQ-1.1: Reduce fugitive dust. MM BR-1.1: Prepare and implement a Weed Control Plan. MM BR-1.2: Develop and implement a Grazing Plan for the project site. MM BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources. MM LU-1.1: Establish construction liaison. MM LU-1.2: Provide advance notification of construction. MM LU-1.3: Provide quarterly construction updates. MM WR-1.1: Groundwater Monitoring and Reporting Plan. MM WR-1.2: Aquifer Testing and Well Interference Analysis. MM WR-6.1: Accidental spill control and environmental training. MM WR-6.2: Store fuels and hazardous materials away from sensitive water resources. MM WR-6.3: Maintain vehicles and equipment.	Class II
Impact AG-4: Contribute to cumulatively considerable agricultural impacts.	MM AG-2.1: Create agricultural conservation easement(s). MM BR-G.3: Development and implementation of a Habitat Restoration and Revegetation Plan. MM BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources. MM BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan for mitigation land. MM BR-1.2: Develop and implement a Grazing Plan for the project site.	Class II

C.3.3.3 Revised Solar Project Impacts

Three agriculture impacts are addressed in this section; cumulative impacts are evaluated in Section C.3.3.6.

Impact AG-1: Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared by the Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (FMMP), to non-agricultural use (Class II)

Because the footprint of the Revised Project is smaller than the project as evaluated in the 2010 Final EIR, impacts related to conversion of agricultural land would be reduced.

The project site is zoned as Agricultural Rangeland and is still used for grazing. The Revised Project would result in permanent impacts to 2,506 acres of FMMP designated Grazing Land. As with the Approved Project, the Revised Project would lead to a loss of grazing land and open space resources, and encroachment of development into a rural agricultural setting, but it would not convert any Farmland (as defined by the DOC FMMP [e.g. Prime Farmland, Unique Farmland, or Farmland of Statewide Importance]) to non-agricultural use. As shown in Tables C.3-1, C.3-2, and C.3-3 and like the Approved Project, the Revised Project would convert prime agricultural soils to non-agricultural use, but to a lesser extent based on the smaller project footprint. The Revised Project would permanently impact 2,163.8 acres of Prime Farmland (based on NRCS Farmland Classification) and 2,430.4 acres of Grade One (Excellent) soils according to the Storie Index.

As described in APM AG-1, and like the Approved Project, the Revised Project would include sheep grazing on the project site. Sheep grazing would occur during operation of the Revised Project during years when there is enough forage on the site to support grazing. Ongoing grazing will be similar to the levels anticipated in the 2010 Final EIR. The number of sheep required to appropriately graze the feed produced on the project site would vary seasonally depending on the rainfall and temperature of each grazing season. During normal rainfall years, anywhere from 1 to 3 bands of sheep (with each band consisting of between 750 and 1,200 adult sheep and offspring, depending on the season) would graze the project site during the winter and spring months (January to May) to use the amount of forage produced prior to and during that season.

The Revised Project would also implement the other adopted mitigation measures that were described in the 2010 Final EIR and summarized in Table C.3-5.

As the 2010 Final EIR explained, the conservation easement(s) would be managed primarily for the preservation of biological resources; and would allow for the continuation of grazing as appropriate. The Applicant would develop an adaptive grazing management plan for the site(s) that facilitates the preservation of both biological resources and the appropriate level of grazing (as part of Mitigation Measure BR-1.2). Although the agricultural use of these biological mitigation lands could be reduced over time as required for the protection of protected species, the presence of permanent conservation easements would ensure that the open space value and rural character of these mitigation lands is protected.

With the implementation of these APMs and mitigation measures, the impacts of the Revised Project on conversion of agricultural land would be slightly less than the Approved Project based on the reduced development footprint and would remain less than significant (Class II).

Impact AG-2: Project would conflict with Williamson Act contracts, existing zoning for agricultural use, or objectives in the County General Plan's Agriculture and Conservation and Open Space Elements (Class II)

Before the publication of the 2010 Final EIR, nearly the entire project site was enrolled in Williamson Act contracts; however, all of these contracts were subsequently approved for cancellation in 2010 on the grounds that the project is incompatible with the Williamson Act and is in the public interest. In all, 12

Williamson Act contracts were fully or partially approved for cancellation; totaling 6,953 acres of contracts (County Assessor's Office, 2010).

The project site is currently zoned as "Agricultural Rangeland" under the San Benito County Zoning Ordinance (County, 2008). San Benito's Zoning Ordinance prohibits most forms of industrial activities in agricultural zones. However, Section 25.07.005 (BB) of the ordinance allows for the uses stated in 25.29.106 as a conditional use in Agricultural Rangeland districts, which includes "public utility facility" as a possible permitted use if these facilities are deemed essential or desirable for the public welfare. Several goals and policies in the Land Use and Conservation Elements of the County's General Plan address preservation of agricultural soils, open space, and rural identity. Specific San Benito County policies are discussed in the 2010 Final EIR.

The Revised Project would not conflict with the Williamson Act since all of the Williamson Act contracts on the project site were approved for cancellation in 2010. The Revised Project would affect the rural character of the Panoche Valley and would convert Prime agricultural soils to non-agricultural use. Because of the smaller footprint of the Revised Project, these impacts would be less than those of the Approved Project.

As with the Approved Project, impacts would be reduced by adopted mitigation measures that were described in the 2010 Final EIR and summarized in Table C. 3-5. With the implementation of these measures, conflicts with existing zoning for agricultural use and objectives in the County of San Benito General Plan's Agriculture and Conservation and Open Space Elements would be less than significant (Class II).

Impact AG-3: Construction and operation of project would impair agricultural use of nearby properties (Class II)

As described in the 2010 Final EIR, there are active agricultural operations near the project boundary. These are predominantly grazing operations, in addition to some orchards, vineyards, and field crops near the southeast portion of the project site. The Revised Project would be approximately 4,770 feet northwest of farmland designated as Prime Farmland and approximately 5,700 feet northwest of farmland designated as Unique Farmland. The project boundary is more than 5 miles east of Farmland of Local Importance.

The 2010 Final EIR identified and analyzed the following potential project impacts on surrounding agricultural land:

- Grading, construction, vehicle operation would create fugitive dust, which could interfere with agricultural operations adjacent to the project site by impacting the biological functions of row crops and annual grassland species used for livestock forage.
- Vehicle operation, grading, and other construction activities could increase erosion and stormwater runoff.
- Construction activities could introduce or increase the populations of invasive weed species that would interfere with nearby field crops, vineyards, and orchards.
- Project construction and operation could restrict the habitat of native predators and lead to increased predation of livestock on nearby farms and ranches.
- Project construction and operation could displace local herbivores and lead to increased damage to nearby croplands from agricultural pests.

- Construction and operational activities could contaminate water resources with hazardous materials, which could run off onto adjacent agricultural land.
- Construction and operational activities would slightly reduce the availability of groundwater for nearby agricultural operations.

Because of its smaller footprint and a 3.5-year reduction in the project construction schedule, the Revised Project would be less disruptive on adjacent agricultural operations over the long term. However, because of the shorter construction period for the Revised Project, the aforementioned construction-phase impacts on surrounding agricultural operations would be greater during the approximately 18 months of construction activities.

In addition and while daily groundwater demand for the Revised Project would be greater during the 18-month construction period, the Revised Project, once operational, would use substantially less water over the 30-year life of the project. Once operational the Revised Project would use approximately 2.84 acre-feet of water per year for operations (assuming that the average number of full time workers is 15 per day) compared to 25.5 acre-feet for the Approved Project.

The Revised Project would implement the same mitigation measures and APMs as the Approved Project to reduce impacts to nearby agricultural properties. These measures are described in the 2010 Final EIR and summarized in Table C.3-5.

The Applicant would also follow Best Management Practices (BMPs) for reducing erosion and sedimentation per the project's required Stormwater Pollution Prevention Plan, which would reduce impacts from potential stormwater runoff. With the implementation of these APMs and mitigation measures, the impacts of the Revised Project on the agricultural use of nearby properties would be less than significant (Class II).

C.3.3.4 Changes to Adopted Mitigation Measures

There have been no changes to the agriculture mitigation measure that was adopted in 2010. The Applicant has proposed a change to one of the Applicant Proposed Measures, which is shown below. Deleted text is shown in strikethrough, added text is shown in underline. Mitigation Measures and APMs not shown in this section have not changed and are presented for reference only in Appendix 3.

APM AG-1 **Grazing sheep on the project site.** ~~Sheep~~ If necessary for vegetation control, sheep would be grazed throughout the project site, except on the 50-65 acres where new roads ~~and~~, buildings, ~~Solar panels, switchyard/substation~~ are constructed or where safety concerns would be raised ~~2 feet off the ground, which would allow sheep to graze underneath~~ prevent grazing. The grazing operation would be a rotational system using short-duration intensive grazing alternating with periods of rest. The project site would be divided into ~~nine~~ pastures, which ~~would~~ could provide forage for between 750 and 3,600 adult sheep depending on annual rainfall and temperatures. The project site would be grazed between January and May. The Applicant would construct new sheep fencing as necessary. Each pasture would have access to water from existing livestock watering facilities.

C.3.3.5 PG&E Upgrades Impacts

The temporary and permanent agriculture impacts of the PG&E Upgrades are analyzed in this section. This analysis is based on the impact statements defined for the solar project, but only the impacts that

apply to the PG&E Upgrades are evaluated. Three agriculture impacts are addressed in this section; cumulative impacts are evaluated in Section C.8.3.6.

Impact AG-1: Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared by the Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (FMMP), to non-agricultural use (Class III)

The PG&E Upgrades would be located on Farmland in San Benito and Fresno Counties, including Grazing Land managed by BLM. The majority of the PG&E related work will include overhead installation of OPGW on existing towers. However, existing 230 kV transmission line crosses under two existing 500 kV transmission lines about 1.5 miles west of the I-5 crossing. At this location, an approximately 4,650-foot section will require the installation of approximately nine permanent wood poles (on a total of 10 square feet) within the existing ROW and on land currently used for agricultural purposes. Installation of these poles would permanently impact approximately 6.66 square feet of Prime Farmland and 3.33 square feet of Grazing Land. Table C.3-1 shows the FMMP designations for the PG&E ROW. Figure C.3-3 depicts the FMMP designations for the PG&E permanent impact areas. Other permanent impacts associated with PG&E telecommunications upgrades, with the exception of the microwave site being installed in the PVS footprint, includes the microwave site at Helm Substation as depicted on Figure C.3-4. As stated above, the site of the Helms Substation microwave tower site is designated as Urban and Built-Up Land by the FMMP, which would not be considered an impact to farmland. In addition to the telecommunications upgrades described above, PG&E would also construct up to twelve new tubular steel poles (TSPs) to tie the existing transmission line into the new PG&E switchyard located within the Revised Project boundaries. These TSPs would be located within the Revised Project site boundaries.

Temporary work areas associated with the PG&E Upgrades are included in the Project Description, Table B-10. Because temporary impacts would not represent conversion of Farmland, this analysis pertains to the area where permanent impacts are anticipated (i.e., locations of new wood poles).

East of the Panoche Valley and west of I-5, the PG&E Moss Landing–Panoche 230 kV transmission line traverses about 6 miles of BLM administered land in the Panoche Hills designated for Grazing Land. The line is located south of the Panoche Hills South Wilderness Study Area. Pull sites are anticipated to be needed within the BLM section of PG&E's ROW. On BLM lands, the OPGW would be installed on existing structures using existing access roads or helicopters. The following PG&E telecommunications upgrades elements would be located on BLM lands:

- 4 temporary wire stringing/pulling sites (75' x 75');
- 2 temporary guard structures (75' x 75'); and,
- A microwave tower temporary work area at Panoche Mountain (100' x 100').

This Panoche Mountain microwave tower site is located on lands managed by the BLM. However, the microwave tower would be collocated on existing American Tower Company (ATC) equipment or constructed entirely within the fenceline of a California Highway Patrol (CHP) station, on which CHP holds a ROW grant until 2040. There would be a 0.23-acre permanent impact to BLM designated Grazing Lands due to construction of the microwave tower; however, because the tower will be located within an existing CHP station, this impact is considered less than significant.

Because permanent conversion of FMMP designated Farmlands would be very limited (10 square feet total, 6.66 square feet of impact to Prime Farmlands), this impact would be less than significant (Class III).

Impact AG-2: Project would conflict with Williamson Act contracts, existing zoning for agricultural use, or objectives in the County General Plan's Agriculture and Conservation and Open Space Elements (Class III)

PG&E Upgrades would occur on lands enrolled in the Williamson Act in both San Benito and Fresno Counties. The upgraded portion of PG&E's ROW passes through approximately 5 miles of Williamson Act lands in San Benito County and approximately 4.4 miles of Williamson Act land in Fresno County. However, transmission lines are generally considered compatible with Williamson Act enrollment and the PG&E Upgrades would take place within existing utility corridors. Microwave tower installations would be located in areas where existing substations or other similar electrical telecommunications infrastructure exists. All of the land where PG&E Upgrades would take place is designated as Agricultural by San Benito and Fresno Counties. However, because impacts would take place within areas with existing utility infrastructure and because permanent impacts on FMMP-designated Farmland would be less than 10 square feet, this impact would be less than significant (Class III).

Impact AG-3: Construction and operation of project would impair agricultural use of nearby properties (Class III)

PG&E Upgrades would occur along 17 miles of transmission line and at several microwave tower sites in agricultural areas San Benito and Fresno Counties. Although permanent impacts would be small and upgrade work would use only existing access roads through agricultural lands, there could be a range of temporary impacts on adjacent agricultural operations during construction. PG&E's construction activities would last between 12 and 16 weeks, with construction at any one location lasting 2 to 3 weeks. Potential temporary impacts would include:

- Grading, construction, vehicle operation would create fugitive dust, which could interfere with agricultural operations adjacent to the PG&E upgrade sites by impacting the biological functions of row crops and annual grassland species used for livestock forage.
- Vehicle operation and other construction activities could increase erosion and stormwater runoff.
- Construction activities could introduce or increase the populations of invasive weed species that would interfere with nearby field crops, vineyards, and orchards.
- Accidental spills related to construction activities could contaminate water resources with hazardous materials, which could run off onto adjacent agricultural land.

The PG&E Upgrades could affect nearby agricultural properties. This risk would be reduced by AMMs that minimize fugitive dust, reduce the spread of noxious weeds, and establish a prevention and response plan for accidental spills of hazardous materials. These measures would be implemented as part of the proposed PG&E Upgrades. The full text of these AMMs is presented in Table B-12 (Section B.11).

In addition, state law requires that PG&E shall create and implement a Hazardous Materials Business Plan. PG&E would also follow its standard BMPs for reducing erosion and sedimentation per the project's required Stormwater Pollution Prevention Plan, which would reduce impacts from potential stormwater runoff. With the implementation of these AMMs, the impacts of the PG&E Upgrades on the agricultural use of nearby properties would be less than significant (Class III).

C.3.3.6 Cumulative Impacts

The projects that have been constructed or proposed in the area of potential cumulative effects have changed since 2010, as described in Section D. The cumulative impacts of the Revised Project would be reduced compared with the Approved Project. The same mitigation measures would apply as described in the 2010 Final EIR. With implementation of Mitigation Measures AG-2.1 (Create agricultural conservation easements), BR-1.2 (Develop and implement a Grazing Plan for the project site), BR-G.3 (Develop and implement a Habitat Restoration and Revegetation Plan), BR-G.5 (Create permanent conservation easements as compensation for impacts to biological resources), and BR-G.6 (Develop and implement Habitat Mitigation and Monitoring Plan for mitigation land), this impact would remain less than significant (Class II). Impacts on agricultural resources from PG&E Upgrades would be minimal. PG&E Upgrades would not significantly contribute to cumulatively considerable agricultural impacts (Class III). Other projects in the area of potential cumulative effects generally would implement mitigation measures similar to those described for the Revised Project. With implementation of mitigation and AMMs, overall cumulative agriculture impacts would be less than significant (Class II).

C.3.4 Summary of Impacts

The significance of impacts for agriculture for the Revised Project and for the PG&E Upgrades is summarized in Sections C.3.4.1 and C.3.4.2. Section C.3.4.3 summarizes the impacts of all project components.

C.3.4.1 Revised Solar Project

There are no changes to the significance of impacts from the conclusions of the 2010 Final EIR. Impact AG-1 (Conversion of Farmland) would be Class II; Impact AG-2 (Conflicts with Williamson Act and zoning) would be Class II; Impact AG-3 (Impairment of nearby properties) would be Class II.

C.3.4.2 PG&E Upgrades

Impact AG-1 (Conversion of Farmland) would be Class III; Impact AG-2 (Conflicts with Williamson Act and zoning) would be Class III; Impact AG-3 (Impairment of nearby properties) would be Class III.

C.3.4.3 Overall Significance of Impacts

There are no significant impacts to agriculture that result from either the Revised Project or the PG&E Upgrades. Mitigation measures adopted in 2010 would reduce potentially significant impacts associated with solar project construction and operation to less than significant levels (Class II). All agriculture impacts related to the PG&E Upgrades would be less than significant (Class III).

With implementation of mitigation measures, APMs, and AMMs, overall cumulative agriculture impacts would be less than significant (Class II).

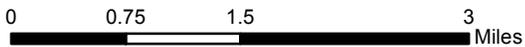
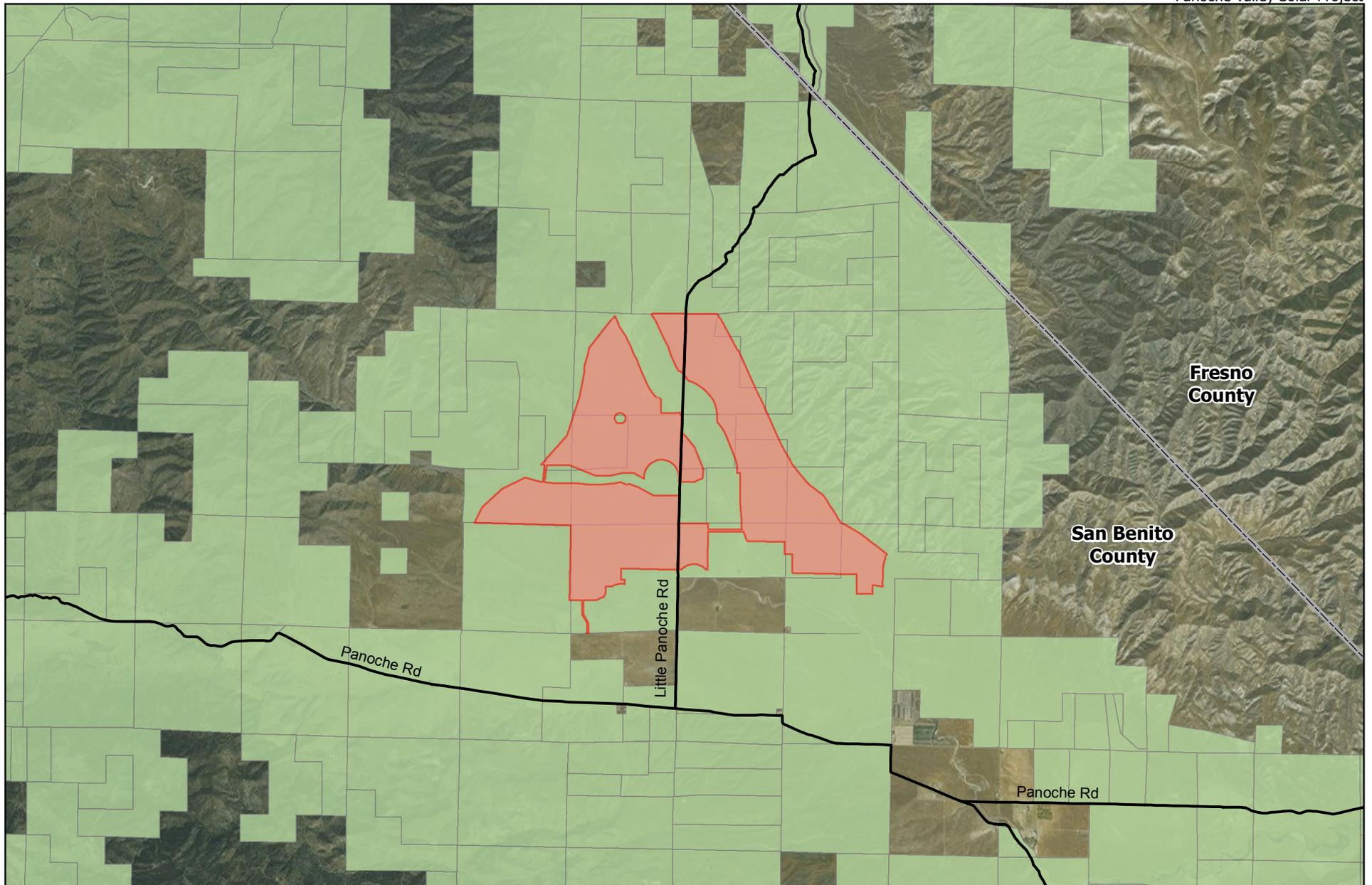
C.3.5 References

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Source: PVS LLC, DOC, San Benito County, ESRI

— Local Road

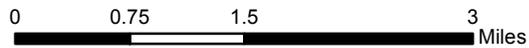
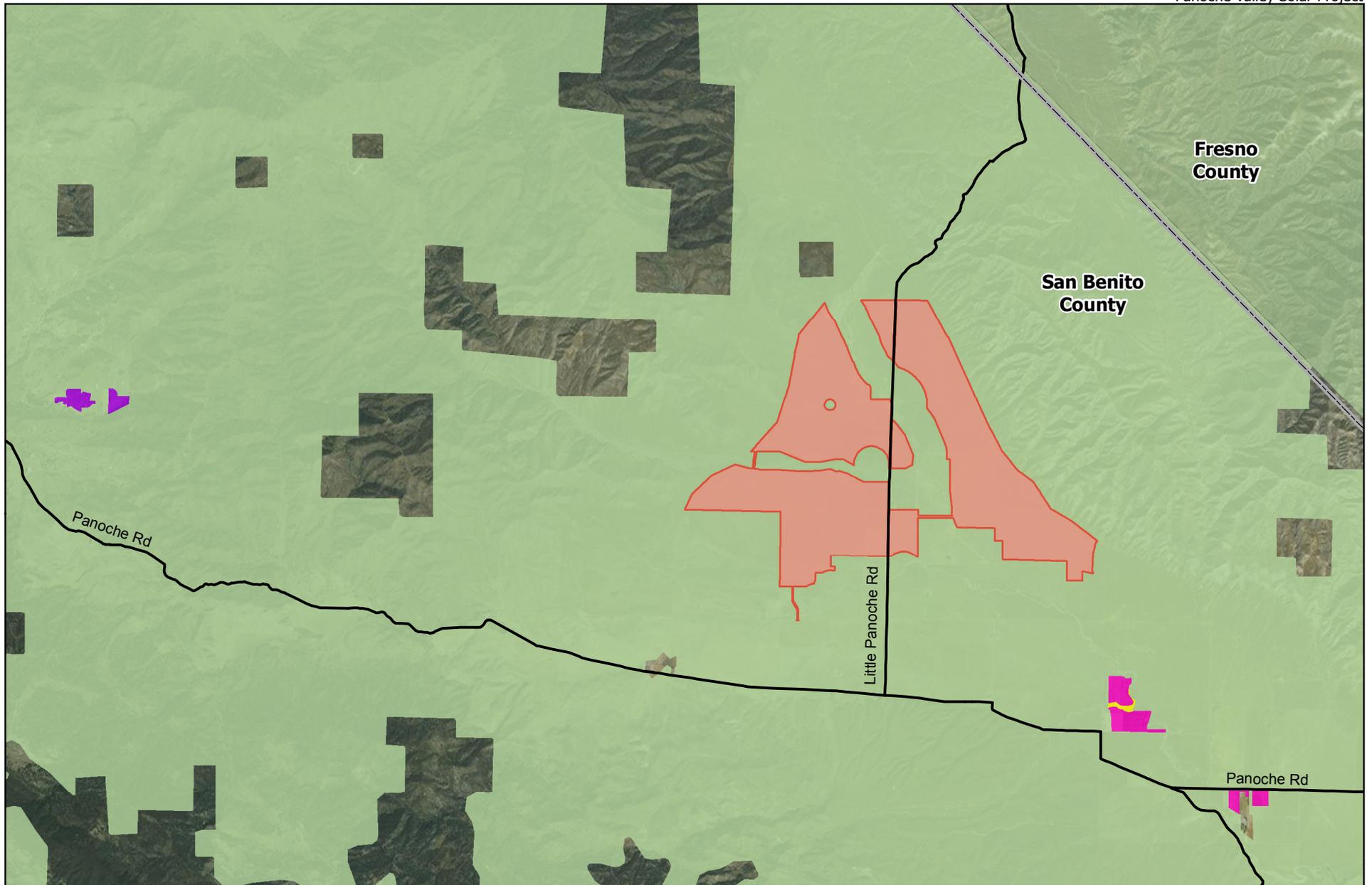
▭ County Boundary

■ Revised Project Area

■ Williamson Act Land

Figure C.3-1

Williamson Act Land
Near Revised Project

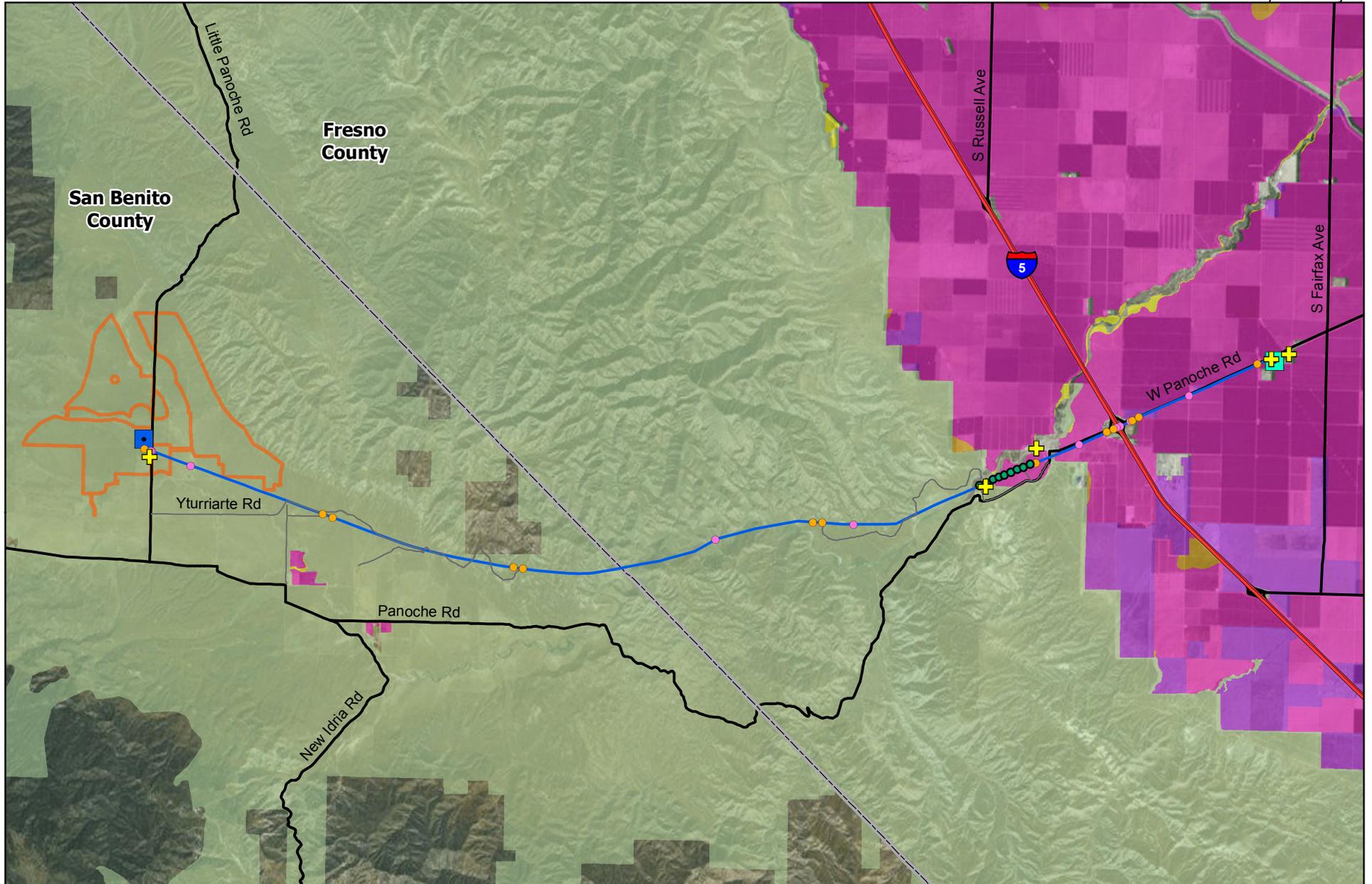


Source: PVS LLC, DOC, ESRI

- | | |
|----------------------|------------------------------|
| Local Road | FMMP Designations |
| County Boundary | Grazing Land |
| Revised Project Area | Farmland of Local Importance |
| | Prime Farmland |
| | Unique Farmland |

Figure C.3-2

FMMP Designations
Near Revised Project

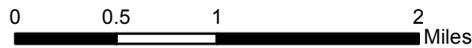
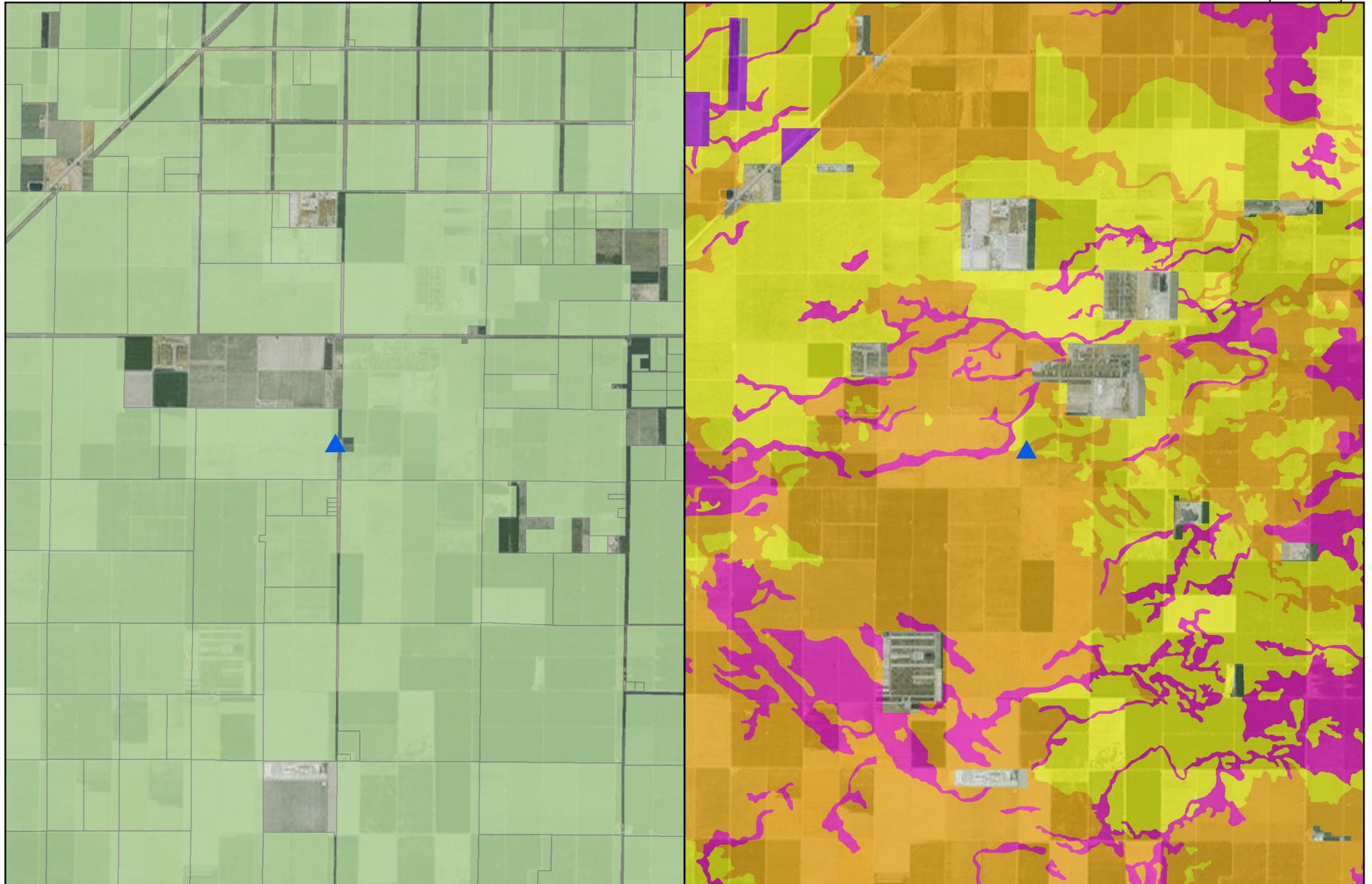


Source: PVS LLC, DOC, ESRI

- | | | |
|-----------------|-------------------------|----------------------------------|
| OPGW | New Wood Poles | Existing Substation |
| Access Roads | Wire Pull Site | Proposed Substation |
| Local Road | Guard Structure Site | Revised Project Area |
| Interstate | Helicopter Landing Site | FMMP Designations |
| County Boundary | | Grazing Land |
| | | Farmland of Local Importance |
| | | Prime Farmland |
| | | Farmland of Statewide Importance |
| | | Unique Farmland |

Figure C.3-3

FMMP Designations Near PG&E Upgrades



Source: PVS LLC, DOC, ESRI

- Helm Microwave Tower
 - Williamson Act Land
- FMMP Designations**
- Farmland of Local Importance
 - Prime Farmland
 - Farmland of Statewide Importance
 - Unique Farmland

Figure C.3-4

Helm Microwave Tower Agricultural Land