

4.2. AGRICULTURE AND FORESTRY RESOURCES

This section includes the following discussion and analysis related to agriculture and forestry resources: existing physical and regulatory setting; methodology and criteria for evaluating impacts; and the results of the impact assessment, including the identification of potentially significant impacts and corresponding mitigation measures to avoid or substantially lessen such impacts to the extent feasible, as appropriate.

PEIR Scoping Comments

During the PEIR Scoping process, the District received three letters containing comments regarding agricultural resources (see PEIR Scoping Report in Appendix A of this document). These comments are summarized below.

California Department of Conservation (CDOC), Division of Land Resource Protection

The comment letter from CDOC's Division of Land Resource Protection notes that the Plan Area contains Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, and that portions of the Plan Area are subject to Williamson Act contracts. The comment letter provides detailed advice on addressing impacts and mitigation measures for agricultural land, and on addressing compatibility with the Williamson Act. For the full text of the CDOC's comments, please refer to Comment Letter C in Exhibit I of the PEIR Scoping Report in Appendix A of this document.

Planning and Conservation League (PCL) et al. & Pacific Coast Federation of Fishermen's Associations

PCL et al. commented that the proposed VCIP would "facilitate the generation and distribution of up to 20,000 MW converting roughly 130,000 acres of agricultural lands to municipal and industrial uses." This letter further commented: "The potential for conversion of agricultural land to municipal and industrial use could conflict with local land use planning objectives. A robust assessment of impacts and the implementation of mitigation measures are indispensable." The comment letter submitted by Pacific Coast Federation of Fishermen's Associations restated the letter submitted by PCL et al. and included PCL's letter as an attachment. For the full text of the comments submitted by PCL et al. and Pacific Coast Federation of Fishermen's Associations, please refer to Comment Letters G and H in Exhibit I of the PEIR Scoping Report in Appendix A of this document.

[Note: Potential impacts related to agricultural resources are addressed in Section 4.2.3. *Environmental Impact Analysis*, below.]

4.2.1. Environmental Setting

4.2.1.1. AGRICULTURAL RESOURCES

Agricultural Setting

According to the California Department of Conservation's (CDOC) Farmland Mapping and Monitoring Program (FMMP), in 2018 (most recent year for which data is available), the State of California contained 32.0 million acres of agricultural land, of which 5.0 million acres were Prime Farmland (CDOC 2023). The total value of agricultural products sold in California in 2022 was \$55.8 billion, which ranked highest in the nation and represented 10.4 percent of the U.S. total of \$536.6 billion (CDFA 2024).

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In 2018 (most recent data available), Fresno County had a total of 2,177,597 acres of farmland, representing about 7 percent of the state total. Fresno County's farmland includes approximately 672,208 acres of Prime Farmland, which comprise 31 percent of the County's total farmland, and approximately 13.4 percent of the state's Prime Farmland (CDOC 2023). The value of agricultural products in Fresno County in 2022 was \$8.1 billion, which ranked second in California (after Tulare County), and represented about 14.5 percent of the state total (CDFA 2024).

The service area of the Westlands Water District encompasses 614,700 acres, of which approximately 564,000 acres are currently considered to be irrigable (with the remainder occupied by small urban places, ranch complexes, commercial centers, agricultural processing facilities, temporary solar facilities (such lands are irrigable following decommissioning unless they are permanently retired lands as described below), Naval Air Station Lemoore, and other non-agricultural uses). However, due to Westlands Water District land acquisition programs and water supply limitations, especially in dry years, the average acreage under cultivation in the District between 2015 and 2024 was approximately 374,293 acres, with the remaining 189,640 acres idled or fallowed (WWD 2025). Throughout the District, 56 different crops were harvested in 2024, including various nuts, fruits, vegetables, grains, and silage crops. About 42 percent of the cultivated acreage was planted in tree crops such as almonds (72,919 acres) and pistachios (85,112 acres), followed by tomatoes (42,654 acres), grapes (raisins, table, wine – 12,236 acres), cotton (23,007 acres), wheat (23,071 acres), and garlic (12,967 acres), with the remaining crops each covering from 10 to 8,000 acres (WWD 2024). Agricultural production in the District generated \$4.7 billion in economic activity in 2024, approximately 58 percent of Fresno County's total (WWD 2025a).

The Plan Area includes approximately 534,800 acres of irrigated and non-irrigated agricultural land comprising the Fresno County portion of the District's service area. The Kings County portion of the District, comprising approximately 79,900 acres, is not included in the Plan Area. The agricultural lands in the Plan Area are planted with permanent tree crops and annual row crops, with the varieties of crops reflected in the crop descriptions above. Agriculture-related features in the Plan Area include scattered ranch complexes with supporting features such as irrigation canals and piping, drainage ditches, farm lanes, electric power lines, and worker housing. In addition, the District has maintenance facilities and offices in the Plan Area, and also owns and operates the irrigation water distribution system and groundwater recharge facilities within its service area.

Historical Context

The Plan Area lies entirely within the service area of the Westlands Water District, which was formed in 1952 to serve agricultural water users on the west side of the San Joaquin Valley. The District is generally bounded on the east by the San Joaquin River, Fresno Slough, and the Kings River, on the west by the foot of the Diablo Range along I-5, and extends from Firebaugh in the north to Kettleman City in the south (see Figure 2.2-1 in Chapter 2). In 2004, the District acquired the Broadview Water District and incorporated its approximately 9,636 acres into the overall District service area. The northern portion of the Plan Area includes the former Broadview Water District.

In 1960, the U.S. Congress authorized construction of the San Luis Unit (SLU) of the Central Valley Project (CVP), and in 1968 deliveries of CVP water began upon partial completion of the San Luis Canal by the U.S. Bureau of Reclamation (USBR). Currently, the District's service area includes 614,700 acres which comprise approximately 88 percent of the San Luis Unit service area. Under its current contract with the USBR, the District is entitled to receive 1.195 million acre-feet of surface water delivery during years when 100 percent of this CVP water is allocated.

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As described in detail below, the soils in most of the Plan Area contain relatively high levels of naturally-occurring salts and trace elements such as selenium and boron. In addition, the presence of clay layers near the ground surface, along with the high clay content of the soils, results in “perched groundwater” conditions and seasonal soil saturation near the root zone of crops. The high groundwater conditions and potential for cumulative soil salinization were recognized in the original congressional authorization for the San Luis Unit, which mandated construction of the San Luis Drain for the exclusive purpose of transporting subsurface drainage from the southern end of the San Joaquin River drainage basin to the Sacramento/San Joaquin River Delta near Chipps Island. An 82-mile segment of the drainage canal, commencing near Five Points and extending northwest to the Kesterson Reservoir near Los Banos, was completed by 1975 but then construction was stopped due to lack of government funding and water quality concerns. Originally intended as regulating reservoir for drainage flows to the Delta, Kesterson became a *de facto* drainage sump where ongoing evaporation of incoming drainage flows resulted in increasingly toxic concentrations of selenium which in turn caused severe impacts to waterfowl nesting at the reservoir, including mortality, reproductive failure, and birth deformities. Kesterson was closed to agricultural drainage water in 1986 and the District has been without drainage service since that time (USBR 2006).

In 2000, a federal court order confirmed that USBR is responsible for providing drainage service to lands within the San Luis Unit. Subsequently, the USBR commenced work on the San Luis Drain Facility Re-Evaluation EIS (SLDFR EIS) to identify and evaluate alternative means of managing the regional shallow groundwater table within the 298,000-acre “drainage-impaired” area by providing drainage service and/or reducing contributions of water to the shallow water table through land retirement. The drainage service would involve construction of complex and costly systems for conveyance, treatment, and reuse of treated drainage water.

Project review and the EIS process led to the USBR’s selection of an alternative involving retirement of 194,000 acres from irrigation (the In-Valley/Water Needs Land Retirement Alternative). The remaining lands within the drainage-impaired area would stay in production and would be provided with drainage service to maintain the water and salt balance for sustainable agriculture within those areas (USBR 2006).

A project feasibility report prepared after the USBR issued its Record of Decision (ROD) estimated total construction costs for installation of the drainage and treatment facilities in the In-Valley/Water Needs Land Retirement Alternative would be \$2.7 billion in 2006 dollars (USBR 2007).

On September 15, 2015, the U.S. Department of Justice and Westlands Water District approved a settlement agreement regarding the drainage issue. Under the terms of the settlement, the District is to assume responsibility for managing drainage within its boundaries; the United States would have exclusive right to the use of all CVP water made available to the District in excess of 895,000 acre-feet for other Project purposes; and the District will permanently retire not less than 100,000 acres from irrigated agriculture, among other things. The retired lands are to be used for drainage water management, renewable energy projects, upland habitat restoration, and other uses (USBR 2015).

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Site Conditions within the Plan Area

Geomorphology and Soils

The parent materials of the soils in the Plan Area originate from marine sediments of the Coast Ranges formed millions of years ago when these lands were on the seabed. These formations, which primarily consist of fine-grained shales, were uplifted over time, and were then subject to erosional forces which transported these sediments downstream to the west side of the valley where they formed large alluvial fans. The geomorphologic processes resulted in the formation of two distinct landform types in the Plan Area: 1) the upper and middle alluvial fans and fan terrace areas in the higher westerly elevations; and 2) the lower alluvial fans or fan skirts, interfan areas, and basin floors located in the lower lying eastern areas.

The sedimentary formations of the Coast Ranges retained high concentrations of salts resulting from evaporative processes over millions of years. Since these salts are soluble, they were dissolved by rainfall and mobilized in drainage courses that carried the salts downstream to be deposited with formation of the alluvial fans. These salts include associated trace elements such as selenium (Se), a semi-metallic element which is essential to human health in very small amounts but hazardous to health in concentrations that exceed 30 parts per billion (ppb) (OEHHA 2010).

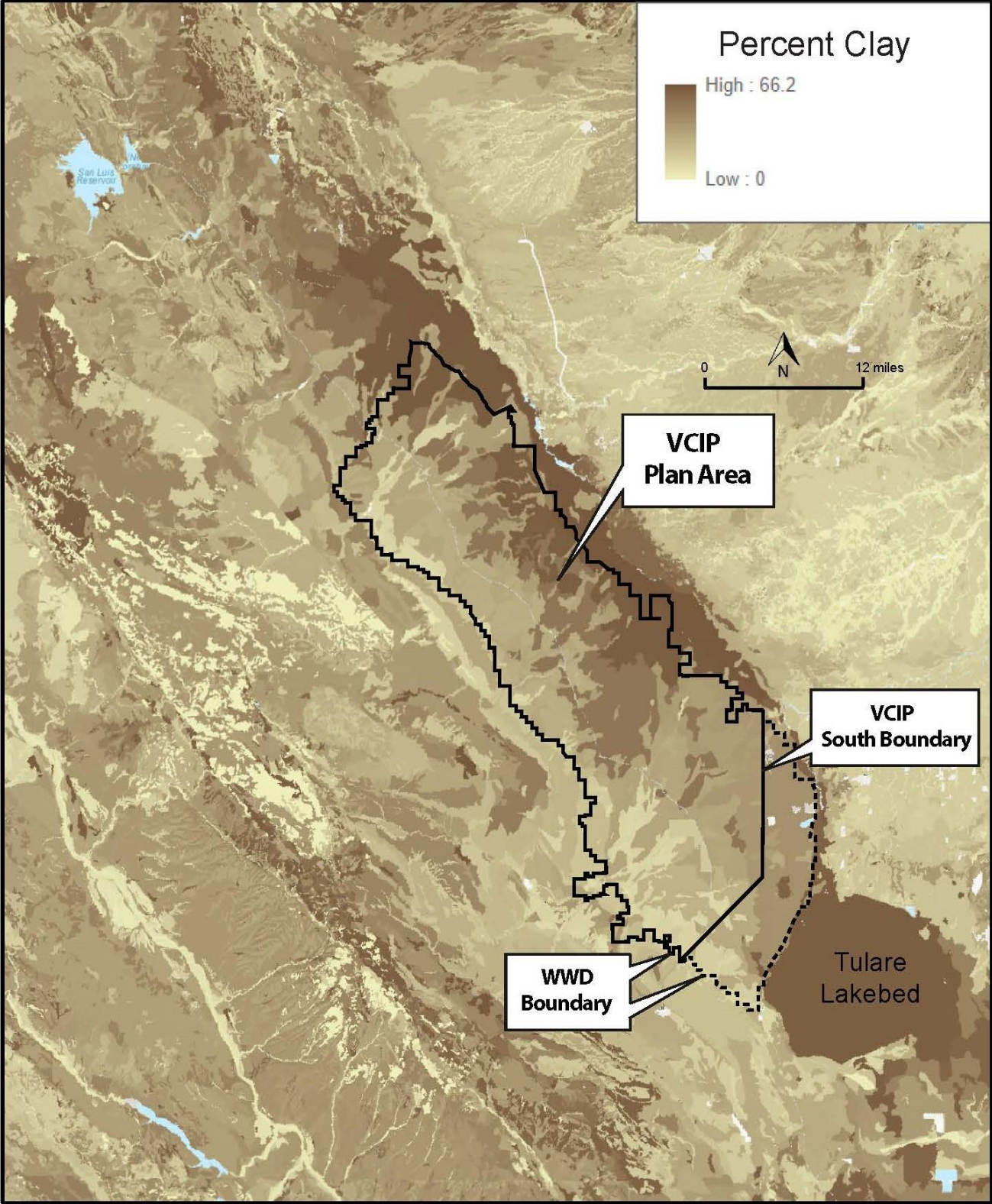
NRCS Soil Survey

The most recent comprehensive soil survey of Western Fresno County was completed in 2006 by the National Resources Conservation Service (NRCS), formerly the Soil Conservation Service (SCS). According to the NRCS Soil Survey, there are five main soil types in the Plan Area, including the Ciervo, Cerini, Tranquillity, Lethent, and Westhaven soils. The Ciervo series is characterized by very deep, moderately well drained, clay soils and is found on the eastern portions of alluvial fans along the center of the Plan Area. The Cerini series is characterized by very deep, well drained, clay loam soils and is found on alluvial fans in the northwestern and south-central portions of the Plan Area. The Tranquillity series is characterized by very deep, somewhat poorly draining clay soils and is found on distal portions of alluvial fans in the northeastern portion of the Plan Area. The Lethent series is characterized by very deep, moderately well drained, clay loam soils and is found on unburied fan remnants in the southeastern portion of the Plan Area. The Westhaven series is characterized by very deep, well drained, loam or clay loam soils and is found on alluvial fans in the south central and southwestern portions of the Plan Area (NRCS 2006).

The dominant soil textures within the Plan Area include clay loam, clay, and sandy loam. The clay loam soils are found throughout the Plan Area, while the clay soils are dominant in the northeastern area located east of the California Aqueduct/San Luis Canal and north of State Route 145 (see Figure 4.2-1). The sandy loam soils are found in limited areas along the foothills of the Diablo Range and along major drainage courses. The soil texture affects both hydraulic conductivity (percolation rate) and drainage capability, with the fine clay soils exhibiting the poorest absorption and drainage capabilities, while the coarser textured soils, such as the sandy loams, having higher hydraulic conductivity and drainage capability. In general, the drainage capability and hydraulic conductivity decreases from west to east in the Plan Area, corresponding to the increasingly high clay content of the soils.

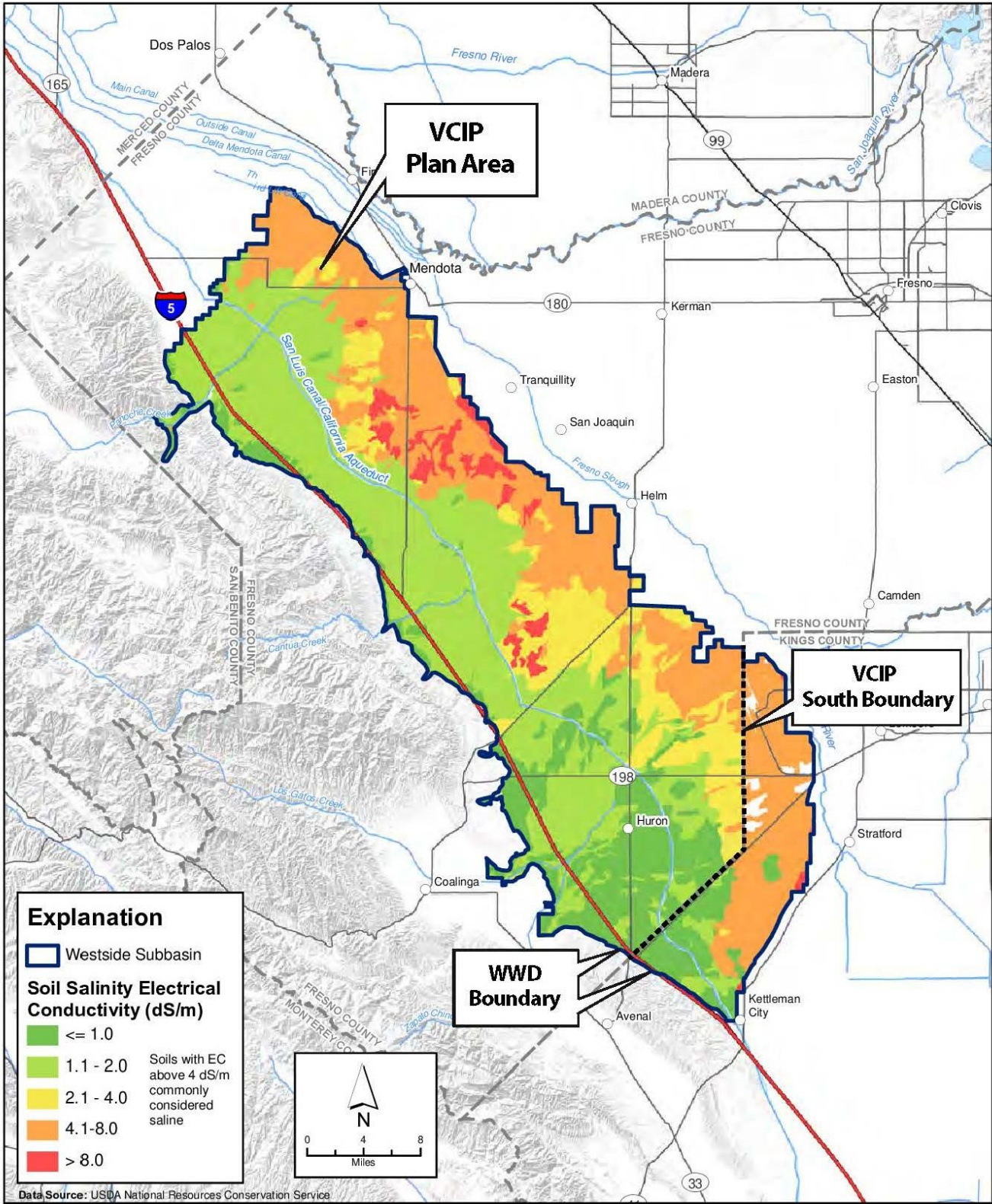
Another important soil characteristic is salinity because it can greatly influence the ability of the soil to support crops. While crops vary in their tolerance for elevated soil salinity, the productivity of most crops becomes impacted when salt concentration exceeds 2,560 mg/L (ppm), or when electrical conductivity (EC) levels are above 4 deciSiemens per meter (dS/m). In general, soil salinity increases from west to east within the Plan Area, with the southern portion having lower salinity than the northern portion (see Figure 4.2-2).

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Source: NRCS, 2008

Soils - Percent Clay
Figure 4.2-1



Source: DWR, 2020

Soil Salinity
 Figure 4.2-2

Higher salinity levels are related to both lower hydraulic conductivity and poor drainage characteristics. Areas with the highest salinity are located in the clay soils of eastern portion of the Plan Area where salinity commonly exceeds 4 dS/m. Salinity is further discussed below under 'Groundwater Conditions'.

NRCS Land Capability Classification

Under the soils classification system of the NRCS, soils are classified according to eight broad 'Land Capability' classes, with Class 1 and 2 soils being the most fertile and well suited for cultivation. In general, soil classifications are associated with soil texture such that sandy loam soils have higher soil classifications and clayey soils tend to have lower classifications. In the Plan Area, the Class 1 and 2 soils are represented by the Cerini and Westhaven clay loams occurring in the west, while the Class 3 soils comprise the Ciervo, Tranquillity, and Lethent clay soils in the eastern portions of the Plan Area. The NRCS describes Class 3 soils as having "severe limitations that reduce the choice of plants or require special conservation practices, or both." Without irrigation, all soils within the Plan Area are classified as Class 7 soils which are described by the NRCS as having "very severe limitations that make them generally unsuited to cultivation and that restrict their use mainly to grazing, forestland, or wildlife" (NRSC 2006).

Farmland Classification Systems

CDOC Important Farmlands Mapping

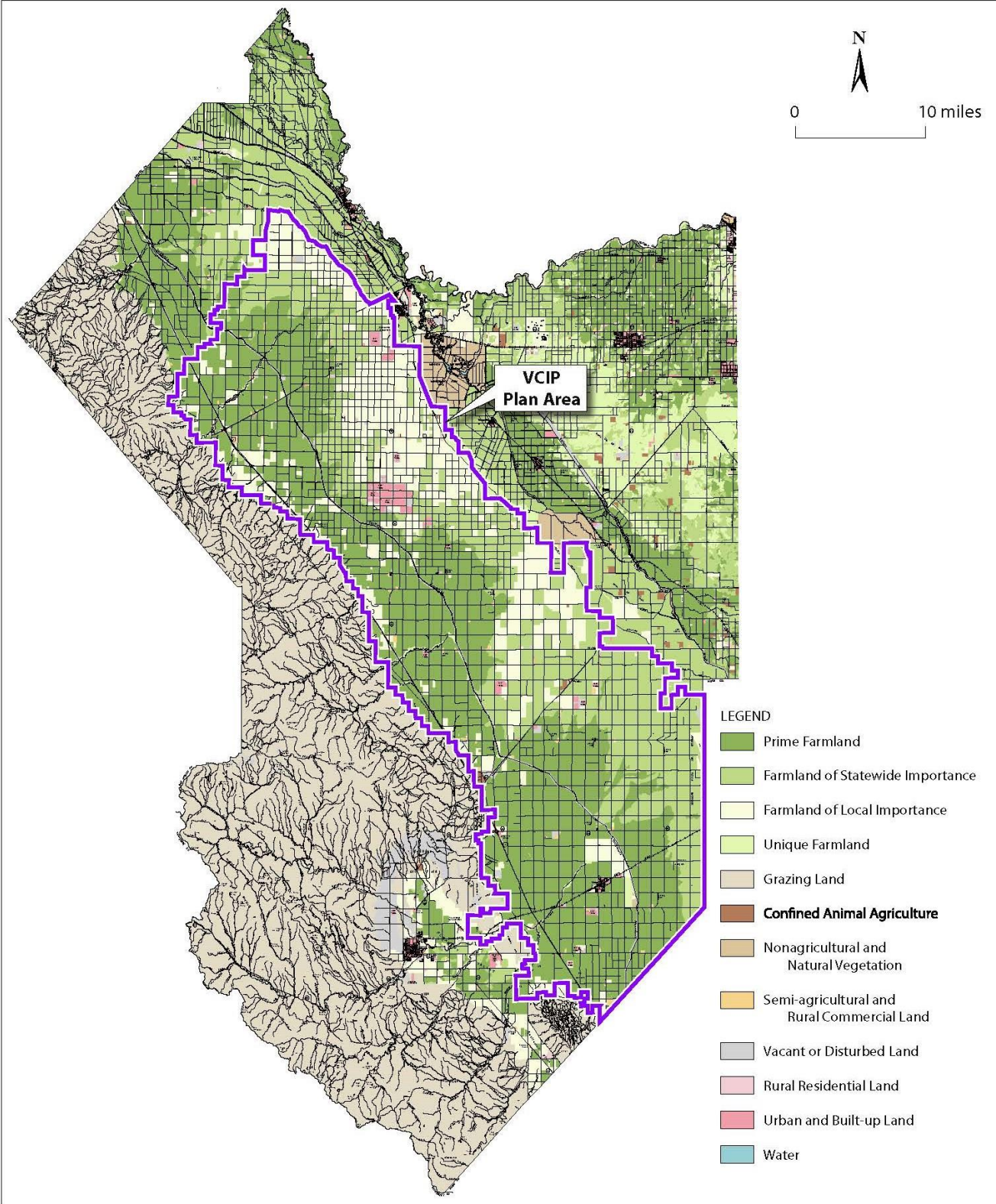
The California Department of Conservation (CDOC) administers and maintains the statewide Farmland Mapping and Monitoring Program (FMMP), under which land is mapped by several categories including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land and other non-agricultural categories (CDOC 2023a). The 2020 FMMP mapping for the Plan Area is shown in Figure 4.2-3. The categories included in the FMMP are described below, along with the approximate amount of land in each category that occurs within the Plan Area.

Prime Farmland. Prime Farmland is defined as lands with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Prime Farmland must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. Approximately 54 percent of the Plan Area is mapped as Prime Farmland, including most of the lands west of the San Luis Canal. Within the Development Focus Areas (DFAs), approximately 28 percent of the lands are mapped as Prime Farmland.

Farmland of Statewide Importance. Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Farmland of Statewide Importance must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. Approximately 29 percent of the Plan Area is mapped as Farmland of Statewide Importance, almost all of which is located east of the San Luis Canal. Within the DFAs, approximately 24 percent of the lands are mapped as Farmland of Statewide Importance.

Unique Farmland. Unique Farmland consists of land other than Prime Farmland and Farmland of Statewide Importance that has a special combination of soil quality, growing season, and moisture supply needed to produce sustained high yields of a specific crop.

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Base map: CDOC, 2023

VCIP - Important Farmlands
Figure 4.2-3

These lands have lesser-quality soils than Prime Farmland or Farmland of Statewide Importance. They are typically 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. The lands designated as Unique Farmland comprise approximately 0.3 percent of the Plan Area, including: a narrow strip of land of about 2,000 acres along the northeast Plan Area boundary near Tranquillity; and an approximately 750-acre parcel along the west side of the San Luis Canal east of the City of Huron. Within the DFAs, approximately 0.15 percent of the lands are mapped as Unique Farmland.

Farmland of Local Importance. Farmland of Local Importance includes all farmable lands within Fresno County that do not meet the definitions of Prime, Statewide Importance, or Unique. This includes land that is or has been used for irrigated pasture, dryland farming, confined livestock and dairy, poultry facilities, aquaculture and grazing land. Approximately 14 percent of the Plan Area is mapped as Farmland of Local Importance. These lands mainly consist of the drainage-impaired farmland acquired by the District and retired from irrigated agriculture in the eastern areas of the Plan Area located east of the San Luis Canal and north of State Route 145. Other small pockets of Farmland of Local Importance occur throughout the Plan Area. Within the DFAs, approximately 48 percent of the lands are mapped as Farmland of Local Importance.

Grazing Land. Grazing Land includes land on which the existing vegetation is suited to the grazing of livestock. There are several isolated parcels of mapped Grazing Land distributed along the west boundary of the Plan Area along the foot of the Diablo Range. None of these lands are within DFAs.

Rural Residential Land. Rural Residential Land includes residential areas of one to five structures per ten acres. The Plan Area includes several areas mapped as Rural Residential Land; these mainly consist of small population centers such as Cantua Creek, Three Rocks, Westside, and Five Points, as well as some large ranch complexes. Rural Residential Lands and small communities are excluded from DFAs.

Urban and Built-up Land. Urban and Built-up Land includes 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. Within the Plan Area, lands mapped as Urban and Built-up Land include the Cities of Huron and Mendota, several utility-scale solar facilities, substations, and highway commercial centers. Urban and Built-up Land is excluded from the DFAs.

Other Categories. The Plan Area includes relatively small areas which are mapped in other FMMP categories, including: Confined Animal Agriculture, Nonagricultural and Natural Vegetation, Semi-Agricultural and Rural Commercial Land, Vacant or Disturbed Land, and Water.

In summary, the vast majority of lands in the Plan Area are included in three FMMP categories, including: Prime Farmland (~54% of the Plan Area); Farmland of Statewide Importance (~29%); and Farmland of Local Importance (~14%). Approximately 3 percent of the Plan Area is included in other FMMP categories. The DFA lands are similarly dominated by these three FMMP categories, but in different proportions, including: Prime Farmland (~28% of DFA lands); Farmland of Statewide Importance (~24%); and Farmland of Local Importance (~48%). The DFA lands include no other FMMP categories (DOC 2023a).

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Groundwater Conditions

The Plan Area is located within the Westside Subbasin which contains two general water bearing zones: an Upper Aquifer situated above a nearly impervious Corcoran Clay layer; and a Lower Aquifer below the Corcoran Clay. In the Plan Area, the depth of the Corcoran Clay layer ranges from approximately 400 to 800 feet below the ground surface and ranges in thickness from 25 to 100 feet (DWR 2020, Figs. 2-29 and 2-30). In the southwestern portion of the Plan Area, near the City of Huron, the Corcoran Clay layer is absent such that the Upper and Lower Aquifer is a single unit (WWD 2021b). As discussed above, the eastern portions of the Plan Area are characterized by fine-textured clayey soils with low permeability and slow groundwater movement. These upper clay layers are slow draining soils which result in a high or “perched” groundwater table that is typically within 5 to 15 feet of the ground surface throughout the eastern portions of the Plan Area (WWD 2015, 2017b).

Soil and Groundwater Impairment Due to Salinity

Under irrigated agriculture, soluble salts and selenium in the native soils are dissolved and are leached into the groundwater. As discussed above, subsurface drainage is restricted due to the presence of the near-surface clay layers as well as the high clay content of the near-surface soils. With the application of irrigation water, the impedance of downward drainage by the slow-draining soils and the near-surface clay layers results in rising groundwater levels. The salts and selenium in the near-surface groundwater are transported upward toward the surface through capillary action, or wicking. When the near-surface water evaporates, the precipitated salts are left behind, resulting in increased salinity in the surface soils (USBR 2006, p. 13-2).

The elevated salt concentrations in soil and groundwater tend to inhibit plant growth and reduce yields. In general, plants can absorb only pure or near-pure water such that the higher the salt concentration, the less water is available to plants, even though the soil may appear wet. This is known as “physiological drought” and has the same effect as an actual drought in terms of starving plants of water needed for growth. However, there is some variation in the ability of plants to tolerate saline water, with each plant or crop having different thresholds of salinity tolerance where crop yields begin to diminish rapidly (CSU 2014). Soil salinity is measured by concentration of Total Dissolved Solids (TDS) measured in milligrams per liter (mg/L)¹, or by Electrical Conductivity (EC) measured in deciSeimens per meter (dS/m). Most row crops and most tree crops (nuts and fruits) have salt tolerances of less than 1,280 mg/L (2 dS/m); few crops have salt tolerances greater than 1,280 mg/L; and a few grains and cotton can tolerate salt levels exceeding 2,560 mg/L (4 dS/m)(FAO 2020). Soils are considered “saline” at EC of 4 dS/m (DWR 2020, Fig. 2-24) or at TDS of 2,000 mg/L (USBR 2006, p. 6-3).

Within the Westside Subbasin, the soil salinity problem arose as early as the late 1890s with the application of well water to field crops, and resulted in lands going out of production within a short period of years. The completion of the San Luis Unit of the USBR’s Central Valley Project in the 1960s provided surface water for irrigation. While this vastly expanded the area that could be placed under irrigated agriculture on the valley’s west side, it also added large quantities of water to the already shallow water table in the eastern areas of the San Luis Unit, including the Plan Area. In addition, surface water includes some salts, which further exacerbates the soil salinity imbalance and salt mass loading. Also, irrigation water pumped from wells screened in the Lower Aquifer contains increasing concentrations of salts that have leached down from the surface into the Lower Aquifer over the years. The rising concentration of salts and the rising water table can

¹ 1 mg/L = 1 part per million [ppm]
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have the dual effect of waterlogging the root zone of planted crops and exceeding their salt tolerance. With advances in agronomic practices over the years, growers in the drainage-impaired areas have been able to apply advanced management techniques to increase irrigation efficiency and provide for calibrated leaching of some salts from the near-surface groundwater. Nevertheless, substantial acreage within the District (including large portions of the Plan Area) has been retired from irrigated agriculture since the early 2000s because the groundwater drainage problem was too severe (USBR 2006, p. 13-2).

As mentioned, most vegetable and fruit crops have salt tolerances of less than 1,280 mg/L, and a few grains and cotton can tolerate salt levels exceeding 2,560 mg/L (FAO 2020). EC mapping contained in the Groundwater Sustainability Plan (GSP) for the Westside Subbasin shows that EC levels in the eastern portions of the Plan Area are greater than 2 dS/m (TDS > 1,280 mg/L), with the majority of these lands exceeding the 4 dS/m (TDS >2,560 mg/L) salinity threshold, and with several areas exceeding 8 dS/m (TDS >6,400 mg/L) (DWR 2020, Fig. 2-24)(see PEIR Figure 4.2-2). The areas mapped with EC levels higher than 2 dS/m correspond to areas mapped by FMMP as Farmlands of Statewide Importance and Farmlands of Local Importance, which covers an area of approximately 220,000 acres, which is also the area with clay soils. (It is noted that the EC measured in surface water delivered from the San Luis Canal from mid-May to mid-July 2024 ranged from approximately 0.24 to 0.44 dS/m (=TDS ~154 to 282 mg/L)[DWR 2024].) The recommended secondary maximum contaminant level (SMCL) set by the California Department of Public Health (CDPH) for TDS in drinking water is 500 mg/L, and the upper limit is 1,000 mg/L (SWRCB 2018a.)

USBR's sampling of the shallow groundwater for selenium indicated that concentrations within the Plan Area range from 5 to 1,000 ppb, with the highest concentrations occurring in the central and northern portions of the Plan Area (USBR 2006, Fig. 6-2). The State of California Public Health Goal (PHG) for selenium in drinking water is 30 parts per billion (ppb)²(OEHHA 2010). The U.S. Environmental Protection Agency's (EPA) ambient water quality criterion for protection of aquatic life is 5 ppb selenium (USBR 2006, p. 5-4). Calcium, magnesium, boron, bicarbonates, and chlorides were all found to be present at elevated concentrations (USBR 2006).

Irrigation Water Supply Constraints

Irrigation water for most of the Plan Area is largely provided by surface water delivered through the District. In the early 2000s, the District acquired approximately 89,300 acres of privately-owned land within District boundaries and retired these lands from irrigated agriculture due to drainage impairment and high salinity levels or to reallocate the water supply to other cropland. Since then, no imported surface water or pumped groundwater has been applied to those retired lands with non-irrigation covenants, although dry farming for winter wheat continues on lands leased to area growers. Farmlands within the Plan Area that are not retired remain eligible to receive surface water deliveries. Currently, the maximum CVP water allocation available to Eligible Cropland in the District is approximately 2.6 acre-feet per acre per year (i.e., 1,195,000 AFY annual entitlement / 470,000 irrigable acres within the District) when the CVP provides 100 percent of the contract amount.

In recent years, actual deliveries of CVP contract water to the District have been dramatically curtailed. Also, passage of the Central Valley Project Improvement Act and adoption of other regulations dedicated more water to fish and wildlife places the District at a very low priority for water deliveries during times of shortage. During the 10 years between 2015 and 2024, the District received an average of 36 percent of its CVP contract water. In 2014, 2015, 2021 and 2022, the District received zero allocations of CVP contract water, and in 2016

² 1 ppb = 1 microgram per liter [µg/L].
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received 5 percent of its CVP contract water (WWD 20234). To meet the irrigation requirements of planted crops under such conditions, private landowners on non-District-owned lands augment reduced CVP water supplies with pumped groundwater or by acquiring supplemental water. But since the groundwater is relatively high in salinity, the generally low salinity tolerant crops limits the effectiveness of blending groundwater with higher quality CVP contract. Due to the unavailability of CVP contract water deliveries during the years noted above, combined with the quality and quantity constraints on groundwater pumping, an average of approximately 189,640 acres were fallowed annually within the District between 2015 and 2024, representing 34 percent of the irrigable farmland in the District (WWD 2024).

In January 2020, the District’s Board of Directors adopted the Groundwater Sustainability Plan (GSP) for the 622,215-acre Westside Subbasin, which includes the District’s entire service area of 614,700 acres. The GSP process determined that the long-term sustainable yield across the subbasin is 305,000 acre-feet per year (WWD 2022). Under the GSP, there are approximately 525,000 acres within the subbasin that are eligible to receive a Groundwater Allocation, subject to limits on the volume of groundwater that can be pumped in a given year without negative impacts identified in the GSP. The groundwater allocation program includes a “transition period” from 2022 to 2030, in which a uniform annual allocation is initially established at 1.3 acre-feet per acre and then subsequently reduced each year by 0.1 AF per acre until 2030 when the allocation would reach 0.6 AF per acre (WWD 2022). For purposes of this PEIR, the available groundwater supply for Eligible Cropland in the Plan Area is assumed to be 0.6 AF per acre per year, as construction would be projected to start in 2028, with full buildout in 2038. (See Section 4.10. *Hydrology and Water Quality*, item ‘e’, for a full discussion of the District’s Groundwater Sustainability Plan.)

Transmission Corridors Outside the VCIP

The delivery transmission corridors extending outside the Plan Area to load centers would have a total length of approximately 348 miles, of which about 95 miles would pass through agricultural resources composed of “Prime Farmland,” “Farmland of Statewide Importance” and “Unique Farmlands.”

4.2.1.2. FORESTRY RESOURCES

VCIP Energy Resource and Infrastructure Plans

The Plan Area does not contain any land defined as forest land (as defined by Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or land zoned Timberland Production (as defined by Government Code section 51104(g)). Almost all of the lands available for timber production in Fresno County lie within the southern part of the Sierra National Forest and the northern portion of the Sequoia National Forest (Fresno County 2000a).

Transmission Corridors Outside the VCIP

The delivery transmission lines extending outside the Plan Area would traverse 10 counties en route to the regional load centers. The northern transmission route would traverse the San Joaquin Valley floor from the Newport Substation northwestward to the vicinity of the Dos Amigos Pumping Plant, where it would cross over Interstate 5 (I-5) and follow the lower elevations of the Diablo Range north to the Tracy and Tesla Substations. The land cover along the northern transmission route consists primarily of agricultural land on the valley floor, and in the foothill segments it consists entirely of annual grasslands which transitions to blue oak woodlands on the higher terrain to the west. No part of the northern transmission corridor passes through forest lands (USFS 2017).

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The western transmission corridor would commence at the Newpoint Substation on the valley floor and extend westward across the Coast Ranges of San Benito and Monterey Counties for a total of 76 miles until reaching the Moss Landing Substation on Monterey Bay. The route primarily traverses mountainous terrain with two small agricultural valleys at Panoche Valley and Paicines. The land cover consists of coastal range woodland and chaparral scrub where the dominant forest types are blue oak in the east and coast live oak in the west near the coast (USFS 2017).

The southern transmission route would extend southward on the San Joaquin Valley floor until reaching the Tehachapi Range southeast of Bakersfield. The transmission route would then run southeastward over the mountains for about 21 miles, running adjacent to the existing SCE 500 kV transmission line. Crossing the Tehachapi Range, the alignment traverses two forest ecosystem types including 12 miles of sparsely wooded blue oak woodland, and 9 miles of moderately to densely wooded canyon live oak forest (USFS 2017). South of the Tehachapis, the final 40-mile segment of the southern transmission corridor passes through the Antelope Valley where the dominant ecosystem is juniper woodland. This area is characterized by open desert with sparse coverage by junipers and other species endemic to the high desert.

4.2.2. Regulatory Context

4.2.2.1. VCIP ENERGY RESOURCE PLAN

Federal

There are no federal regulations pertaining to agriculture and forestry resources that are applicable to the VCIP.

State

Williamson Act

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act (Gov. Code, § 51200 et seq.), enables local governments to enter contracts with private landowners to place lands within “Agricultural Preserves,” thus restricting use of those lands to agricultural, related open space, or compatible uses. In return, landowners receive reduced property tax assessments. The initial term of a Williamson Act contract is 10 years pursuant to Government Code section 51244(a), with the contracts automatically renewing for an additional year on January 1 of each year. The automatic renewal continues indefinitely unless a notice of non-renewal or contract cancellation is filed. If a non-renewal notice is filed, then the contract does not renew itself; the use restrictions and reduced tax assessment on the property begin to phase out of the Agricultural Preserve Program over a 9-year period. Non-renewals involve no penalties, while contract cancellations must meet certain findings and currently are subject to a penalty of 12.5 percent of the property’s unrestricted value.

1998 Amendments to Williamson Act – Farmland Security Zones

In 1998, the Williamson Act was amended to expand the provisions and include additional tax benefits to agricultural landowners who entered 20-year Farmland Security Zone contracts (Government Code sections 51296-51297). The same automatic contract renewals occur annually as they do under Williamson Act {00081343.1}

contracts. No land can be included in a Farmland Security Zone unless requested by the landowner, and any land located within a city's sphere of influence cannot be included unless the creation has been approved by the city with jurisdiction within the sphere of influence. As with conventional Williamson Act contracts, non-renewals involve no penalties, while contract cancellations are subject to a penalty of 25 percent of the property's unrestricted value.

In general, each Williamson Act contract or Farmland Security Zone contract stipulates that the property in an Agricultural Preserve or Farmland Security Zone may not be used for any purpose than the production of agricultural products for commercial purposes and related or compatible uses. Utility infrastructure such as transmission lines are deemed compatible uses within any agricultural preserve under the Williamson Act (Government Code, section 51238).

A large portion of the lands within the Plan Area is owned by the District, as shown in the most recent mapping of Williamson Act lands by the California Department of Conservation, depicted in Figure 4.2-3. Under Government Code section 51295, any Williamson Act or Farmland Security Zone contracts in effect at the time of the District's acquisition of these lands were deemed null and void since public agencies may not be parties to such contracts. As such, none of the District-owned lands within the Plan Area are subject to Williamson Act or Farmland Security Zone contracts. Upon transfer of ownership of such lands to private parties, however, the Government Code requires that these lands be reenrolled in the Williamson Act program with new contracts. Remaining lands within the Plan Area are largely under Williamson Act (10-year) contracts, and a few parcels are under Farmland Security Zone (20-year) contracts (CDOC 2016).

2011 Amendments to Williamson Act – Solar-Use Easements – SB 618 (Wolk)

Senate Bill (SB) 618, which took effect on January 1, 2012, is intended to provide a third method for terminating Williamson Act contracts (including Farmland Security Zone contracts), in addition to the non-renewal and cancellation methods described above. In particular, SB 618 allows for rescission of existing contracts for the purpose of placing the contracted lands into solar-use easements for photovoltaic electricity generation. Contract rescission under SB 618 is permitted only if it can be shown that the lands are physically impaired or marginally productive for agricultural production.

Water Code Sections 37860-37861 (AB 2661)

AB 2661, approved on September 25, 2024, and chaptered as Water Code sections 37860-37861, specifically authorizes the Westlands Water District to provide, generate, and deliver solar photovoltaic electricity and to construct, operate, and maintain improvements and property necessary for generating and delivering electricity generated from its facilities. The bill would require the District to use the electricity generated for the District's own purposes, with the ability to sell surplus electricity to a public or private entity engaged in the distribution or sale of electricity. The bill also authorizes the District to construct, operate, and maintain energy storage systems and electrical transmission lines within its boundaries. The bill also requires that the District establish a community benefits agreement plan for the VCIP and related projects, with specific benefits to include but not limited to: job creation and training programs for local residents, use of local businesses and vendors, and financial contributions to community development projects and programs.

California Public Resources Code – Forest Land and Timberland

The California Public Resources Code governs forestry, forests, and forest resources, as well as range and forage lands, within the state. "Forest land" is defined by Public Resources Code Section 12220(g) as "land that {00081343.1}"

can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” “Timberland” is defined by Public Resources Code Section 4526 as “land, other than land owned by the federal government... which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”

California Government Code – Timberland Production Zone

Chapter 6.7 of the Government Code regulates timberlands within the state. “Timberland production zone” is defined in Section 51104(g) as an area that has been zoned pursuant to Government Code Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. In this context, “compatible uses” include any use that “does not significantly detract from the use of the property for, or inhibit, growing and harvesting timber” (Gov. Code, section 51104(h)).

Fresno County

Fresno County General Plan (General Plan)

The Agriculture and Land Use Element of the Fresno County General Plan describes land use designations and development standards for unincorporated land within the County, and sets out goals, policies, and programs related to agriculture and land use. The General Plan land use designation covering the entire Plan Area is “Agriculture,” which provides for production of crops and livestock and for location of necessary agriculture commercial centers, agricultural processing facilities, and certain nonagricultural activities (Fresno County 2024b). The General Plan does not specifically mention utility-scale solar, energy storage, or any other form of renewable energy generation. The following General Plan policies and programs are applicable to the VCIP. Analysis of a typical VCIP project’s consistency with the General Plan’s Agriculture policies is presented in Section 4.11. *Land Use and Planning, under Impact LU-2.*

Agriculture and Land Use Element

A. Agriculture

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.

Policy 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.

Policy 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.

Policy 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-

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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;

Criteria 'e' through 'h' relate to the approval of commercial centers, value-added agricultural processing facilities, churches, schools and existing commercial uses and are not applicable to VCIP development.

Policy 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.

Policy LU-A.13 Agricultural Buffers. The County shall protect agricultural operations from conflicts with nonagricultural 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.

Policy 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.

Policy LU-A.15 Right-to-Farm Notice. The County shall generally condition discretionary permits for development within or adjacent to agricultural areas upon the recording of a Right-to-Farm Notice, which is an acknowledgment that residents in the area should be prepared to accept the inconveniences and discomfort associated with normal farming activities and that an established agricultural operation shall not be considered a nuisance due to changes in the surrounding area.

Policy 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.

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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 (Fresno County 2024b).

Fresno County Zoning Ordinance

As shown on the Fresno County Zoning Map, almost the entire VCIP Plan Area and all land within the proposed DFAs are zoned “AE” Exclusive Agricultural District, which is further divided into acreage designations. Most of the Plan Area is within the AE-20 zone where the minimum parcel size is 20 acres, while lands at the southeastern and western margins of the Plan Area are within the AE-40 zone where the minimum parcel size is 40 acres. The only non-agriculturally-zoned lands are in two unincorporated communities, including Cantua Creek, which has a small area zoned “R1-Single Family Residential” and a small area zoned “TP-Trailer Park Residential,” and Three Rocks (El Porvenir), which has a small area zoned “R1-Single Family Residential.” In addition, Three Rocks/El Porvenir and the unincorporated community of Westside have small areas zoned “AC-Agricultural Commercial Center.”

Under Fresno County Zoning Ordinance section 842.5.020.B, photovoltaic (PV) solar facilities and other renewable energy projects, including energy storage and transmission facilities, are permitted through the County’s Unclassified Conditional Use Permit (UCUP) process subject to the County’s Solar Facility Guidelines (see below).

Fresno County Solar Facility Guidelines

The Solar Facility Guidelines adopted by the Fresno County Board of Supervisors on May 21, 2013, and revised on December 12, 2017, provide general guidelines and policies, as well as an outline for the process of evaluating solar facilities within Fresno County (Fresno County 2017). Analysis of a typical VCIP project’s consistency with all Solar Facility Guidelines is presented in Section 4.11. *Land Use and Planning, under Impact LU-2*. The Solar Facility Guidelines specific to agricultural resources require the following:

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).
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.
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.

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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.
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.
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. If the project is approved, adequate financial security to the satisfaction of the County shall be provided to ensure site reclamation.
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 a new land use permit will need to be obtained.

Fresno County Williamson Act Interim Program Guidelines and Procedures

In accordance with the requirements of Government Code section 51231, the Fresno County Board of Supervisors adopted Interim Guidelines and Procedures for the County's Williamson Act Program in 2004 (Fresno County Williamson Act Guidelines). Regarding land uses deemed to be compatible with Williamson Act contracts, the Fresno County Williamson Act Guidelines provide: "Pursuant to the Williamson Act, the use of enrolled lands and improvements shall be limited to commercial agricultural or uses determined to be compatible or incidental to commercial agriculture" (Fresno County 2004).

Fresno County Right-to-Farm Ordinance

Fresno County Code section 17.72.075(A) requires recordation with the Fresno County Recorder of a right-to-farm notice for certain activities within 300 feet of an AE Zone District, in substantially the following form:

FRESNO COUNTY RIGHT-TO-FARM NOTICE

It is the declared policy of Fresno County to preserve, protect, and encourage 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

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become a nuisance due to a changed condition in a locality after such agricultural pursuit has been in operation for three years.

In conformance with the Fresno County Solar Facility Guidelines, the Applicant would be required to record such a notice prior to the County's issuance of permits for VCIP projects.

Westlands Water District

The District's Rules and Regulations include several provisions regarding water supply for farmlands that are repurposed for a modified use such as solar generation facilities.

Rules and Regulations – Article 2 – Surface Water Allocation - Appendix A

This section of the District's Rules and Regulations applies to CVP contractual and legal entitlements and provides for the "temporary, albeit long-term, modification" of "Eligible Cropland" (i.e., eligible to receive surface water deliveries) to a non-irrigable use (e.g., solar generation facility) if a conditional use permit is obtained for such use, and the term of the land use is limited by the permitting agency and by a lease or easement on the land, and that upon cessation of such use, the facility will be decommissioned and returned to a condition suitable for agricultural use, as guaranteed through the posting of a performance bond or other financial assurance. These provisions allow for the DFA lands to retain their eligibility for CVP allocation subject to the condition that the subject lands will remain suitable for agricultural use after the solar and related facilities are removed from the lands.

Rules and Regulations – Article 1 – Groundwater Allocation

Subject to annual groundwater allocations as determined by the District under the Groundwater Sustainability Plan (GSP), and other conditions set forth in Article 1, landowners may transfer groundwater to other Eligible Land within the District. The definition of "Eligible Land" corresponds closely with "Eligible Cropland" for surface water deliveries under Article 2, and thus most VCIP solar and energy storage projects would be eligible for groundwater supplies. In 2030 and subsequent years, the annual groundwater allocation will be limited to 0.6 acre-feet per acre per year, which reflects the long-term sustainable yield within the Westside Subbasin.

AB 2661 – VCIP

As described above, AB 2661 authorizes the District to construct, operate, and maintain solar generation facilities, energy storage systems, and electrical transmission lines within its boundaries. The bill requires the District to establish a community benefits agreement plan for the Valley Clean Infrastructure Plan and related projects (Water Code, sections 37860-37861). AB 2661 recognizes "the unique need of the Westlands Water District to support the development of solar electrical generation for the electrical grid and to facilitate the development of transmission capacity to help California reach its clean energy and climate goals." Pursuant to AB2661, the District is considering the proposed VCIP as the policy and planning framework for incremental repurposing and management of drainage-impaired and other private and District-owned lands within the District's boundaries, which would be expected to occur through proposals by GSCE to develop clean energy generation, storage, transmission, and other ancillary and supportive uses.

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4.2.2.2. VCIP INFRASTRUCTURE PLAN

Fresno County

Fresno County General Plan

All elements of the VCIP Infrastructure Plan (substations, gen-tie lines, internal transmission lines) would be in Fresno County. All lands that would be occupied by the collector substations and traversed by the gen-tie lines and connector transmission lines are designated Agriculture in the Fresno County General Plan. The General Plan does not specifically mention electrical utility infrastructure (Fresno County 2024b).

Fresno County Zoning Ordinance

Under chapter 808.2 of the Fresno County Zoning Ordinance, “public utility facilities” are allowable uses in the Agricultural zones subject to a Conditional Use Permit. Under Section 842.5.020(B), “public utility and public services, structures, and uses” are allowed subject to an Unclassified Conditional Use Permit (Fresno County 2024a).

4.2.2.3. TRANSMISSION CORRIDORS OUTSIDE THE VCIP PLAN AREA

Agricultural Resources

Agricultural Zoning. The delivery transmission lines would pass through the unincorporated areas of 10 counties to the north, west, and south of the Plan Area. In each of these counties, the transmission lines would traverse lands zoned for Agriculture. Depending on the county, the zoning ordinances allow utility facilities either as permitted uses, conditionally permitted uses subject to Planning Commission approval, or permitted subject to administrative approval or Planning Commission review (Alameda Co. 2025a; Fresno Co. 2024i; Kern County 2025a; Kings County 2025b; LA County 2025a; Merced Co. 2025a; Monterey Co. 2025; San Benito Co. 2025a; San Joaquin Co. 2025a; Stanislaus Co. 2023).

Williamson Act. The outside transmission segments traversing the San Joaquin Valley would pass through substantial areas of contracted land. The northern transmission lines would leave the valley floor in the vicinity of the Dos Amigos Pumping Plant and follow the lower slopes of the Diablo Range northward where few lands are under Williamson Act contract. The western transmission line to Moss Landing would leave the valley floor west of I-5, traverse the Coast Ranges and pass through two small valleys with Williamson Act contracts. The southern transmission lines would leave the valley floor southeast of Bakersfield, passing over the Tehachapi Range and crossing the Antelope Valley where few lands are under Williamson Act contract.

Forestry Resources

The transmission corridors assumed in this PEIR would not pass through any lands which are zoned forest land, timberland, or Timberland Production under the applicable statutes. In addition, there are no National or State Forests in the vicinity of the delivery transmission corridors.

The northern transmission lines pass through the counties of Fresno, Merced, Stanislaus, and San Joaquin, and would terminate at the Tesla and Tracy Substations in Alameda County. In these counties, the transmission route would pass through lands zoned Agriculture. Timber harvesting is not a permitted use in Agricultural zones

{00081343.1}

in any of the affected counties (Fresno Co. 2025a; Merced Co. 2025a; Stanislaus Co. 2023; San Joaquin Co. 2025a; Alameda Co. 2025a).

The western transmission route passes through the unincorporated areas of western Fresno County and San Benito County, and would terminate at the Moss Landing Substation in Monterey County. In San Benito County, the transmission route passes entirely through lands zoned “Agricultural Rangeland (AR)” where timber harvesting is not listed as a permitted or prohibited use. However, timber harvesting is included in the definition of “Agricultural Operations” which are protected under Section 19.01.001 of the San Benito County Code (San Benito Co. 2025a). In Monterey County, timber harvesting is permitted in the unincorporated areas subject to a timber harvesting plan submitted pursuant to the Zberg-Nejedly Forest Practices Act of 1973 (Monterey Co. 2025).

The southern transmission corridor passes through the unincorporated areas of the Counties of Fresno, Kings, Kern and Los Angeles, and the Cities of Lancaster and Palmdale in Los Angeles County. In the unincorporated county areas, the southern transmission corridor passes through lands zoned Agriculture (Fresno County 2025b; Kings County 2025a; Kern County 2025b; LA County 2025b). Under the Kern County Zoning Ordinance, permitted uses in Agricultural zones include the growing and harvesting of timber (Kern County 2025a). However, as discussed below, the transmission route through the Tehachapi Mountains passes exclusively through oak woodlands which are protected under the Kern County General Plan Land Use, Open Space, and Conservation Element – Policy 65, in conformance with the state’s oak woodland protection requirements under Public Resources Code section 21083.4 (Oak Tree Preservation)(Kern County 2009). In northern Los Angeles County, the transmission route passes exclusively through lands zoned A-2, where timber logging is permitted subject to Site Plan Review (LA County, 2025a, 2025b). Los Angeles County’s Antelope Valley Area Plan Policy COS 16.1 states that new development shall: “minimize removal of native vegetation” and “ensure that a large percentage of the land is left in its natural state.” Timber harvesting is not a permitted use under the Antelope Valley Area Plan (LA County 2015). In the City of Lancaster, the transmission route passes exclusively through lands zoned Rural Residential (Lancaster 2025). In the City of Palmdale, the transmission route partially passes through lands zoned Single-Family Residential, and in the City’s Ritter Ranch and Anaverde Nuevo Specific Plan areas it passes through lands designated/zoned Open Space (Palmdale 1992, 2021, 2025). Timber harvesting is not permitted in any of these land use plans or zoning designations.

4.2.3. Environmental Impact Analysis

This section analyzes the potential for VCIP implementation to result in significant environmental impacts related to agricultural and forestry resources. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid the impact.

METHODOLOGY

Evaluation of potential project impacts on agricultural resources was based on a review of applicable policies, maps, plans, and reports pertaining to the proposed VCIP, which include, without limitation: the Fresno County General Plan and General Plan Background Reports; NRCS’s Soil Survey and mapping for Fresno County; Important Farmland Mapping by the California Department of Conservation’s Farmland Mapping and Monitoring Program (FMMP); mapping of lands enrolled in the state’s Williamson Act Program; and data and reports prepared by the District. To assess potential impacts on forest resources, the analysis considered site {00081343.1}

zoning, site-specific environmental characteristics, forest inventory maps prepared by government agencies, and applicable definitions set forth in state law.

SIGNIFICANCE CRITERIA

Based on Appendix G of the state CEQA Guidelines, the project would be considered to have a significant impact related to agriculture and forestry resources if it would:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use.
- b. Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).
- d. Result in the loss of forest land or conversion of forest land to non-forest use.
- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use.

4.2.3.1. DIRECT AND INDIRECT EFFECTS

Valley Clean Infrastructure Plan

Impact AG-1. Agricultural Land Conversion

VCIP Energy Resources Plan. The solar and energy storage facilities developed on “Farmland” would not alter the physical and chemical properties of the affected agricultural soils, and upon decommissioning the soils would be restored to a condition suitable for agricultural uses. The temporary, albeit long-term, modification of the land for renewable energy facilities would not affect the long-term suitability of the soils for agricultural use. As discussed in the analysis below, implementation of the VCIP Energy Resources Plan would not result in the permanent conversion of “Farmland” and proposed renewable energy facilities thus would not be expected to result in a significant impact related to agricultural resources at the project level. Nevertheless, in light of the scope and duration of the long-term temporary modification of the Plan Area for renewable energy facilities and the need for project-level details (e.g., whether the proposed project includes sheep grazing or other ongoing agricultural activities) and site-specific information to assess the appropriateness and feasibility of mitigation measures (e.g., Fresno County General Plan Policy LU-A.23), this impact is conservatively considered *significant and unavoidable* at the plan level. (*Significant Unavoidable Impact*)

VCIP Gen-Tie and Connecting Transmission Lines. The VCIP gen-tie lines and connector transmission lines would result in the permanent loss of “Farmland” on a series of very small parcels occupied by the tower

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footings, which would be dispersed over the length of the corridors and would involve removal of a total of approximately 47 acres of “Farmland” throughout the total 339-mile length of the corridors. As discussed in the analysis below, the loss of this small aggregate acreage of dispersed Farmland is considered insubstantial within the overall farming units and would not represent a significant impact related to agricultural resources. (*Less-than-Significant Impact*)

VCIP Collection Substation No. 5. VCIP Substation No. 5 would involve the permanent conversion of approximately 60 acres of contiguous Farmland, which would represent a significant impact related to agricultural resources. (*Significant Unavoidable Impact*)

VCIP Energy Resource Plan – Analysis of Impact AG-1

As discussed in Section 4.2.1 *Environmental Setting*, the California Department of Conservation’s (CDOC) FMMP map “Important Farmland Fresno County 2020” classifies approximately 83 percent of the Plan Area as “Prime Farmland,” “Farmland of Statewide Importance,” or “Unique Farmland,” all of which comprise “Farmland” under CEQA Guidelines Appendix G. Table 4.2-1 includes a breakdown of acreages for each FMMP category within the Plan Area, as well as acreages of various farmland categories within the VCIP Development Focus Areas (DFAs).

The DFAs cover approximately 136,000 acres, or about 25.5 percent of the Plan Area. As shown in Table 4.2-1, about 28 percent of the DFA lands are Prime Farmland, approximately 24 percent are Farmland of Statewide Importance, and less than 1 percent are Unique Farmland. Taken together, these lands constitute “Farmland” under CEQA, and have a combined total of approximately 71,000 acres, or 52 percent of the DFA total acreage. The remaining 65,000 acres, or 48 percent of DFA lands, are classified as Farmland of Local Importance which is not included in the definition of Farmland under CEQA. In the following analysis, the “Non-Farmland” is addressed first, followed by the analysis of “Farmlands.”

**TABLE 4.2-1
FARMLAND CATEGORIES IN VCIP PLAN AREA AND DFAS**

| | Farmland ('000 Acres) | | | Non-Farmland | | ('000 Acres) |
|-----------------------------|-----------------------|----------------------------------|-----------------|------------------------------|-----------------|--------------|
| | Prime Farmland | Farmland of Statewide Importance | Unique Farmland | Farmland of Local Importance | Other Land Uses | |
| VCIP Plan Area | 286.1 | 156.1 | 1.4 | 78.3 | 13.1 | 535.0 |
| Percent of VCIP Area | 53.5% | 29.2% | 0.2% | 14.6% | 2.5% | |
| DFAs | 37.5 | 31.7 | 0.2 | 66.8 | 0 | 136.0 |
| Percent of DFA Lands | 27.6% | 23.3% | 0.01% | 49.1% | 0% | |

Source: CDOC 2023a

Non-Farmland

Approximately 67,000 acres of DFA lands, or 49 percent of the DFA total acreage, is classified as Farmland of Local Importance which is not included in the definition of Farmland under CEQA. As discussed in Section 4.2.1 *Environmental Setting* above, most of these lands were acquired by the District via a drainage settlement because of their drainage impairment due to perched groundwater and saline soil conditions, or acquired for

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water supply. The District discontinued surface water deliveries to these lands and also discontinued groundwater pumping on these lands. Conversion of lands mapped as Farmland of Local Importance under FMMP to non-agricultural uses is not considered a significant impact under CEQA.

Farmland

The DFA lands classified by the FMMP as “Farmlands” include Prime Farmland (about 28 percent of the DFA lands), Farmland of Statewide Importance (approximately 23 percent of DFA lands), and Unique Farmlands (less than 1 percent of DFA lands). Under the CDOC’s mapping criteria, these farmland classifications are based on physical and chemical soil properties as informed by NRCS soil survey data (CDOC 2004).

While the 23 percent of DFA lands classified as Farmland of Statewide Importance are included in the CEQA definition of Farmland, the lands so classified within the Plan Area largely consist of clay soils with elevated salinity and poor subsurface drainage. The main soil types covering this area – Ciervo, Tranquillity, and Lethent clay – are all classified by NRCS as Class 3 soils which have “severe limitations that reduce the choice of plants or require special conservation practices, or both.” Without irrigation, these soils are classified as Class 7 soils which are described by the NRCS as having “very severe limitations that make them generally unsuited to cultivation and that restrict their use mainly to grazing, forestland, or wildlife” (NRCS 2006). In addition, almost all of these lands were classified as “drainage impaired” in USBR’s San Luis Drainage Feature Re-evaluation EIS/EIR, and were identified as lands to be considered for retirement from irrigated agriculture (USBR 2006). Thus, while these lands are considered Farmland under CEQA, their agricultural productivity is substantially less than Prime Farmland. When all DFA lands that are subject to some degree of impairment are combined (e.g., Farmlands of Local Importance and Farmlands of Statewide Importance) the total acreage of impaired farmlands is approximately 98,500 acres, or 73.5 percent of the total DFA land area.

The VCIP solar and energy storage facilities would take the DFA lands out of agricultural production for 35 years, which reflects the predicted useful life of these facilities. In Fresno County, where the proposed VCIP is located, solar operators are required to prepare and submit a Reclamation Plan prior to the issuance of building permits, and to implement the County-approved Reclamation Plan upon decommissioning of their solar and energy storage facilities, as required by the County’s Solar Facility Guidelines. The Reclamation Plan is required to specify the termination date of the solar use and the timeline for removal of all above-grade and below-grade improvements, and to detail the specific measures to reclaim the site to its previous agricultural condition including types of crops to be planted. The Reclamation Plan is to include an engineering cost estimate for reclaiming the site to its previous agricultural condition. Implementation of the Reclamation Plans is guaranteed by the posting of performance bonds or other forms of financial surety. The conditional use permits issued by the County for solar and energy storage projects expire upon termination of the initial life of the solar lease (i.e., 35 years under the proposed VCIP), and new land use permits are required if the solar use is proposed to be extended (Fresno County 2025c). This reflects the County’s objective that the solar and energy storage uses will be temporary, albeit long term, in nature. The long-term temporary duration of the solar use is also reflected in the type of land transactions that would be required with participating private landowners in the VCIP. Instead of having the solar developers purchase the privately owned land in fee simple, the DFA lands would be subject to leases or easements for solar use, whereby upon decommissioning of the solar facilities, with all land rights reverting to the underlying landowner. Modification of these agricultural lands for solar and related facilities represents a management decision for certain agricultural lands within the overall farming unit(s). The farming unit remains intact because the management or following decision is temporary within the overall ongoing agricultural use.

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Recognition that the solar and energy storage facilities will be agriculturally compatible and temporary, albeit long-term in nature is further reflected in the District's Rules and Regulations Article 2, Appendix A which provide that privately owned agricultural lands modified to a non-irrigable use may retain their eligibility for water supply (i.e., for transfer to other agricultural lands in the District) subject to specified conditions, including a requirement that the subject lands either retain their existing agricultural character during the operational life of the project, or, upon cessation of project uses, will be returned to a condition suitable for agricultural uses. Article 2, Appendix A also requires decommissioning plans and financial assurances of reclamation upon termination of the modified use. Thus, both the District and the County have established mechanisms and measures to ensure that the modified use of agricultural lands is not permanent.

Construction of the solar and energy storage facilities would involve minimal grading, with 90 percent of each solar site occupied by elevated solar arrays and the ground beneath maintained in vegetative cover. The risk of soil contamination during construction and operation of solar and energy storage facilities would be minimized through implementation of the hazardous materials provisions of the required Storm Water Pollution Prevention Plans (SWPPPs) and Hazardous Materials Business Plans (HMMPs). Also, implementation of the County-approved Pest Management Plans during operation and maintenance of the facilities would prevent the emergence and spread of weeds while minimizing the use of herbicides and pesticides. Decommissioning would involve the removal of all structural elements of the facilities, including concrete pads and foundations, and surface material for internal driveways. The required implementation of SWPPPs during decommissioning would minimize the risk of soil contamination during that final project phase. After the structural elements of a facility have been removed, the limited areas subject to excavation for foundations would be refilled with native soils, and areas subject to compaction for internal driveways would be mixed and loosened. The entire site would be tilled to restore the pre-project agricultural soil texture and density. The physical and chemical properties of the soil would be preserved during the operating lives of the solar and energy storage facilities, and post-project reclamation would ensure that the site soils are restored to a condition suitable for agricultural use.

The repurposing of agricultural land for solar and related uses for a limited period of time under the VCIP would not result in the permanent or temporary loss of Farmland. Under baseline conditions, restrictions on availability of irrigation water supply have necessitated the fallowing of an average of 189,640 acres of land per year in the District over the last ten years (i.e., 53,640 *more* acres than that total DFAs (136,000 acres) are fallowed each year, on average). Thus, under baseline conditions it is not feasible to irrigate all Farmland within the Plan Area each year. At the same time, the viability of agricultural operations on some Farmland would be substantially lost if fallowed. For example, approximately forty-five percent (45%) of the cultivated acreage within the District consists of tree crops (158,031 acres) and grapes (12,236 acres) that require irrigation each year. Sustained production of certain row crops may also become infeasible due to the economic and practical effects of fallowing on a farming operation. This tension between the irrigation required to sustain agriculture on Farmland within the District and the inability to irrigate all Farmland creates a present need to redirect scarce water resources to the productive agricultural lands with the most pressing needs. Crucially, this background level of fallowing (i.e., unrelated to the proposed VCIP) is expected to increase, as restrictions on water supply are expected to worsen over the short-and-long term as limitations on groundwater pumping take full effect under SGMA and due to climate change. Due to these background changes, it will not be feasible to irrigate additional Farmland, and additional trade-offs will have to be made to maintain agricultural viability.

In light of these existing conditions, characterized by reduced water supply reliability and increased mass fallowing of Farmland, the District's water supply objectives for the proposed VCIP are to enable the effective

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implementation of the GSP while maintaining the viability of agricultural operations by providing for temporary modification of agricultural lands. The VCIP is intended to address the chronic shortage of CVP contract water deliveries by promoting repurposing of farmland to facilitate the redirection of scarce allocations of this CVP contract water to other productive land within the District. Under Article 1 and Article 2, Appendix A of the District's Rules and Regulations, the surface and groundwater allocations applicable to the modified agricultural lands are permitted to be transferred to the portions of the farming units to be retained in agricultural production, thereby enhancing the productivity and viability of the larger farming units.³ A related objective of the VCIP is to provide utility-scale power generation on farmland that has been fallowed or removed from irrigated agriculture due to lack of a reliable surface water supply, which reduces pressure to develop renewable energy on prime agricultural land elsewhere. The temporary repurposing of agricultural land under the VCIP, alongside the transfer of water from modified lands to other productive agricultural lands would create an orderly framework for significant fallowing that will invariably occur. The VCIP's coordinated approach would avoid haphazard fallowing decisions, help reduce overall fallowing acreage, and minimize the amount of land that would be economically unproductive in the absence of the VCIP. Rather than the proximate cause of fallowing, the proposed VCIP is an adaptive approach that would contribute to the solution of how to manage reduced water supply reliability and the substantial amount of fallowing that must occur in any given year. In sum, the District's objective is to maintain the viability of the farming units through temporary repurposing of farmland which would be subject to long-term fallowing in any event. For these reasons, implementation of the VCIP would ultimately be environmentally beneficial and protective of agricultural resources within the Plan Area.

An objective of the proposed VCIP is also to ensure financing of decommissioning and site reclamation at the end of each project's life to restore each site to conditions suitable for agricultural use. This objective would enable the return of the entire farming units to agricultural production in the future. As such, it is imperative that the physical properties of the soils on the temporarily repurposed lands are preserved to conserve the agricultural capability of those lands. Through implementation of a Vegetation and Soils Management Plan (VSMP)(identified in MM AG-1 below) and a Reclamation Plan at each potential project site, the solar and related uses of the repurposed lands would provide for the effective stewardship of their agricultural capability during the interim period when the lands are put to alternative productive use. As such, while the repurposed lands would temporarily be taken out of agricultural production, the lands would not be temporarily converted to non-farmland. Instead, these lands would be managed to maintain their agricultural capability and to prevent their permanent conversion to non-agricultural use. While the implementation of VCIP solar and related projects would result in the temporary use of farmland for the production of renewable energy, it would also fulfill the basic objectives of the District of effectively implementing the GSP while managing the land to preserve its long-term agricultural capability. The temporary repurposing of any Farmland would also ensure its long-term conservation for the future resumption of agricultural production, and the temporary solar land use would preserve the agricultural capability of the soil. Therefore, while the repurposing of the land would temporarily remove it from agricultural production, it would not commit the land to permanent conversion to non-agricultural uses. In fact, the VCIP would accomplish the opposite by committing the land to be preserved for future resumption of agricultural uses. Therefore, the proposed renewable energy facilities would not be expected to result in a significant impact related to agricultural resources at the project level. Nevertheless, in light of the scope and duration of the long-term temporary modification of the Plan Area for renewable energy facilities and the need for project-level details (e.g., whether the proposed project includes sheep grazing or other ongoing agricultural activities) and site-specific information to assess the

³ It is anticipated that the VCIP would be implemented in coordination with additional agricultural land repurposing projects pursuant to the GSP. As provided in the GSP, collectively these groundwater sustainability initiatives would promote reduced groundwater demand while supporting the local economy through clean energy development. {00081343.1}

appropriateness and feasibility of mitigation measures (e.g., Fresno County General Plan Policy LU-A.23), this impact is conservatively considered *significant and unavoidable* at the plan level.

In this context, it is important to note that under General Plan Land Use Policy LU-A.23 Farmland Conversion, “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.” Policy LU-A.23 further provides that “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.” This policy recognizes that potential impacts to agricultural lands should be balanced against the substantial benefits associated with promoting groundwater sustainability pursuant to a GSP and any other potentially overriding benefits associated with a project. Application of the exemption is a policy matter to be determined at the project level and cannot be assessed in this PEIR.

This impact analysis explains that VCIP implementation would not be expected to result in a temporary or permanent conversion of Farmland at the project level and instead represents a coordinated and adaptive approach to protect agricultural resources despite existing conditions of water shortage and widespread fallowing. The GSP expressly identifies the VCIP as a potential “Agricultural Land Repurposing” project that would implement the GSP. Additionally, as recognized by the Legislature in enacting AB 2661, the District, due to its location, topography, and excellent insolation (solar radiation energy), has unique potential to “support the development of solar electrical generation for the electrical grid and to facilitate the development of transmission capacity to help California reach its clean energy goals.” Through temporary repurposing, the VCIP would generate up to 21,000 MW of clean energy per year that would replace fossil-based generation. Implementation of the VCIP would also provide significant community benefits and related economic and social benefits. As such, implementation of the VCIP would provide substantial and unique environmental, social, and economic benefits that should also receive significant weight in any balancing.

In summary, construction and operation of the VCIP solar and energy storage facilities would not be expected to adversely affect any of the physical and environmental characteristics of the project sites that qualify them for mapping as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland under CDOC’s Farmland Mapping and Monitoring Program. While the long-term temporary repurposing of Farmland may contribute to the temporary remapping of these lands by FMMP to a Non-Farmland, once these lands are returned to agricultural use upon decommissioning and reclamation, these lands would be remapped as Farmland by FMMP.⁴ Given that the solar and energy storage projects would have an expected life of 35 years and would not alter the physical and chemical properties of the agricultural soils, and further would be subject to requirements ensuring that the existing physical character of the soil will be retained during the operational life of the project and, upon cessation of project uses, the land will be restored to a condition suitable for agricultural uses, these facilities would not affect the long-term suitability of their sites for agricultural use. Therefore, implementation of the VCIP Energy Resources Plan would not be expected to result in the permanent conversion of “Farmland” to non-agricultural uses at the project level. In light of the scope and duration of the long-term temporary modification of the Plan Area for renewable energy facilities and the need for project-level details (e.g., whether the proposed project includes sheep grazing or other ongoing

⁴ Under existing conditions, it is not feasible to irrigate and cultivate all Farmland within the DFAs and the Plan Area. Background effects such as SGMA implementation and climate change will exacerbate the existing chronic shortage of water supply and further reduce water supply reliability. Therefore, to the extent any Farmland is remapped due to extended fallowing, these existing conditions and known trends suggest this fallowing would likely occur without implementation of the VCIP.
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agricultural activities) and site-specific information to assess the appropriateness and feasibility of mitigation measures (e.g., Fresno County General Plan Policy LU-A.23), this impact is conservatively considered *significant and unavoidable* at the plan level.

VCIP Infrastructure Plan – Analysis of Impact AG-1

Implementation of the VCIP Infrastructure Plan would involve use of agricultural land for the siting of VCIP collector substations, gen-tie lines, and VCIP connector transmission lines. Each of these infrastructure elements is discussed in turn below.

VCIP Substations

Each of the five VCIP collection substations would be constructed on a site of up to 60 acres. The Infrastructure Plan shows that four of these substations would be located on lands classified “Farmlands of Local Importance” (i.e., Non-Farmland) and one substation site (Substation 5) as “Farmlands of Statewide Importance” (i.e., Farmland) as mapped by FMMP. Thus, the substations would overall occupy up to 60 acres of Farmland (Substation 5) and 240 acres of Non-Farmland (remaining four substations). Four of the five substation locations are under the District’s ownership. The location of Substation 5 is currently in private ownership but is anticipated to be acquired by the District, because like the other four substation sites, the planned substation would be considered permanent and likely would not be decommissioned. Therefore, the construction of Substation 5 would constitute a permanent conversion of Farmland to non-agricultural uses. This would represent a *significant impact* related to agricultural resources.

Fresno County General Plan Policy LU-A.23 requires mitigation for discretionary land projects that are not directly related to or supportive of agricultural uses and which propose the permanent conversion of 20 acres or more of Prime Farmland, Unique Farmland or Farmland of Statewide Importance to nonagricultural uses. Such mitigation would include the acquisition of conservation easements, mitigation land, fee-in-lieu, or mitigation banking. As mentioned above however, under this policy the County may exempt projects from agricultural mitigation when (1) it has been determined that conversion is occurring pursuant to a local groundwater sustainability plan; or (2) if the County 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. The construction of Substation 5 is an integral element of the VCIP Infrastructure Plan, which is intended to facilitate repurposing of certain farmlands in the District in furtherance of the GSP. Additionally, as demonstrated above, by generating up to 21,000 MW per year in furtherance of the state’s renewable energy and climate goals while providing community benefits, implementation of the VCIP would provide substantial and unique environmental, social, and economic benefits that substantially outweigh the loss of 60 acres. As such, based upon this substantial evidence, the conversion of up to 60 acres of Farmland for the construction of VCIP Substation 5 may not require mitigation under Fresno County General Plan Policy LU-A.23.

VCIP Gen-Tie Lines

The VCIP gen-tie corridors would extend from the collector substations, with a total estimated length of up to 260 miles. Although the alignments of the gen-tie lines have not been determined, it is reasonable to assume that they would traverse Farmlands and Non-Farmlands in approximately the same proportions as they are present in the DFAs (i.e., 51% Farmland and 49% Non-Farmland). However, the DFAs on Farmlands are more geographically dispersed in the western and central areas of the Plan Area compared to Non-Farmlands which are more concentrated along the eastern margins of the Plan Area and in closer proximity to the collection substations. This indicates that relatively longer gen-tie lines would be needed to serve the western DFAs, and that these gen-tie lines would mainly traverse Farmlands (“Prime Farmland” and “Farmland of Statewide

Importance”). This difference is somewhat offset by the fact that the eastern DFAs would require a greater density of gen-tie lines to serve the higher concentration of generating facilities. On balance, it is estimated that approximately 60 percent (or 156 miles) of the gen-tie lines would pass through Farmlands, and about 40 percent (or 104 miles) of the gen-tie lines would traverse Non-Farmlands. As shown in Table 4.2-2, the construction of the gen-tie lines would result in the temporary disturbance of 928 acres of Farmland, due to construction activity at the tower installation sites, the pulling and tensioning sites, and the equipment staging sites. Upon completion of gen-tie construction, most of these lands would be restored and returned to agricultural use.

TABLE 4.2-2
VCIP GEN-TIE LINES – FARMLAND DISTURBANCE ESTIMATES

| Gen-Tie Project Feature | Quantities | | Farmland* | Disturbance (Acres) | |
|--------------------------------|-----------------------------|----------------|------------------------|---------------------------------------|-------------------------|
| | Total Gen-Ties ¹ | Farmland* Only | Total Disturbance Area | Temporarily Disturbed/ To be Restored | Disturbed for Long-Term |
| Tower Sites | 2,000 ² | 1,200 | 240 ³ | 216 | 24 ⁴ |
| Pulling/Tensioning Sites | 260 ⁵ | 156 | 624 ⁶ | 624 | 0 |
| Staging/Material Storage Sites | 26 | 16 | 64 | 64 | 0 |
| Totals | -- | | 928 ac. | 904 ac. | 24 ac. |

Footnotes:

- ¹ Total length of gen-tie corridor within VCIP is estimated to be up to 260 miles.
- ² Monopoles spaced as close as 800 feet apart; or 6.6 towers per mile, plus one extra monopole per mile for turning and crossing points.
- ³ Temporary disturbance area at each monopole site = up to 0.2 acres (8,100 sf), i.e., temporary clear areas = up to 90 X 90 feet.
- ⁴ Long-term disturbance area at each monopole site = 0.02 acres (900 sf), i.e., permanent clear areas = 30 X 30 feet.
- ⁵ Pulling/Tensioning sites are one mile apart.
- ⁶ Pulling/Tensioning sites estimated to disturb an average of 4 acres each.
- ⁷ One staging site per 10 miles of corridor over 260 corridor miles. Each staging site is 4 acres.
- * As mapped by the Department of Conservation, Farmland Monitoring and Mapping Program in 2020 (CDOC 2023a).
 “Farmland” includes Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. Farmland of Local Importance is not included in the definition of “Farmland” per CEQA Guidelines Appendix G).

Source: CDOC 2023a

The gen-tie monopoles would each occupy 0.02 acre, and would result in the total long-term use of 24 acres at the 1,200 dispersed tower sites located on Farmland. The conversion of many small tower sites dispersed over approximately 156 miles of Farmland would represent a *less-than-significant impact* related to agricultural resources.

As described in Section 2.5.2.1.4. *Decommissioning and Reclamation of Gen-Tie Lines*, the VCIP gen-tie lines would be decommissioned at the end of their useful lives unless they are needed for another purpose as determined by the gen-tie owner and approved by the governing agency. It is unknown whether any gen-tie lines would be retained for future use. Therefore, for purposes of this analysis, it assumed that the gen-tie lines would remain in place and result in permanent conversion of 24 acres of Farmland in aggregate over 1,200 dispersed tower sites. As discussed above, this impact related to agricultural resources would be *less than significant*.

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VCIP Connector Transmission Lines

The VCIP connector transmission lines within the Plan Area would have a total length of approximately 79 miles, of which about 25 miles (or 32 percent) would pass through Farmlands composed of “Prime Farmland,” and “Farmland of Statewide Importance.” As shown in Table 4.2-2 on the next page, the construction of the connector transmission lines would result in temporary disturbance of approximately 340 acres of Farmland for tower construction sites, pulling and tensioning sites, and staging areas. Upon completion of transmission line construction, most of these lands would be restored to their pre-project condition. Over the long term, the monopoles would each occupy 0.1 acre, resulting in the total long-term use of 23 acres at the 231 tower sites located on Farmland.

**TABLE 4.2-2
VCIP CONNECTOR TRANSMISSION LINES – FARMLAND DISTURBANCE ESTIMATES¹**

| Transmission Project Feature | Quantities | | Farmland* | Disturbance (Acres) | |
|--------------------------------|------------------|------------------|------------------------|---------------------------------------|-------------------------|
| | Total T-Line | Farmland* Only | Total Disturbance Area | Temporarily Disturbed/ To be Restored | Disturbed for Long-Term |
| Tower Sites | 759 ² | 241 ³ | 231 ⁴ | 208 | 23 ⁵ |
| Pulling/Tensioning Sites | 69 ⁶ | 21 ⁶ | 84 ⁷ | 84 | 0 |
| Staging/Material Storage Sites | 8 ⁸ | 3 ⁸ | 15 ⁸ | 15 | 0 |
| Totals | -- | | 340 ac. | 316 ac. | 23 ac. |

Footnotes:

- ¹ Total length of transmission line (59 miles X 2 lines) + (20 miles X 1 line) = 138 line miles, of which 42 line miles are in Farmland.
- ² Approx. 5 monopoles per line mile = 690 monopoles + 69 extra poles (10% of at turning and crossing points = 759 total monopoles).
- ³ From Footnote 1: 42 line miles in Farmland X 5 poles per mile = 210 towers + 21 extra towers = 231 towers in Farmland.
- ⁴ Temporary disturbance area at each monopole site = up to 1.0 acre, i.e., temporary clear areas = up to 210 X 210 feet.
- ⁵ Long-term disturbance area at each monopole site = 0.1 acre, i.e., permanent clear areas = 65 X 65 feet.
- ⁶ Pulling/Tensioning sites are two miles apart. (138 line miles / 1 site per 2 miles = 69 sites total; Farmland = 42 line miles / 2 = 21 sites)
- ⁷ Pulling/Tensioning sites estimated to disturb an average of 4 acres at each site.
- ⁸ One staging site per 10 miles of corridor over 79 corridor miles (25 corridor miles in Farmland). Each staging site is 5 acres.
- * As mapped by the Department of Conservation, Farmland Monitoring and Mapping Program in 2020 (CDOC 2023a).
“Farmland” includes Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. Farmland of Local Importance is not included in the definition of “Farmland” per CEQA Guidelines Appendix G).

Source: CDOC 2023a

As discussed in Section 2.5.2.3, it is assumed that the VCIP connector transmission lines would not be decommissioned. The permanent conversion of many small transmission tower sites on a total of 23 acres dispersed over approximately 25 miles of Farmland would represent a *less-than-significant impact* related to agricultural resources.

Overall Impact of VCIP upon Farmland

At the end of the useful lives of the VCIP solar and energy storage facilities, those facilities would be decommissioned as discussed above. The overall decommissioning process would take place gradually over several years, reflecting the phased sequence of original facility construction. The construction, operation, and

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decommissioning of the VCIP solar and energy storage facilities would not adversely affect any of the physical and environmental characteristics of the facility sites that qualify them for mapping as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland under CDOC's Farmland Mapping and Monitoring Program. Therefore, these facilities would not affect the long-term suitability of their sites for agricultural use, and their impact upon agricultural resources would not be expected to be significant at the project level. In light of the scope and duration of the long-term temporary modification of the Plan Area for renewable energy facilities and the need for project-level details (e.g., whether the proposed project includes sheep grazing or other ongoing agricultural activities) and site-specific information to assess the appropriateness and feasibility of mitigation measures (e.g., Fresno County General Plan Policy LU-A.23), this impact is conservatively considered *significant and unavoidable* at the plan level.

As discussed above, it is assumed that the VCIP collection substations, gen-tie lines, and connector transmission lines would not be decommissioned after decommissioning of the VCIP energy generation and storage facilities. The gen-tie lines would result in the conversion of approximately 24 acres of Farmland at 1,200 dispersed tower sites over 156 miles, with each site occupying 0.02 acre. The connecting transmission lines would result in the conversion of 23 acres of Farmland, all of which would be dispersed over numerous 0.1 acre sites over a total distance of about 181 miles. The total permanent conversion of 47 dispersed acres of Farmland is considered insubstantial within the overall farming units and would represent a *less-than-significant impact* related to agricultural resources.

The construction of VCIP Substation 5 at its proposed location would result in the conversion of up to 60 contiguous acres of Farmland. This would represent a *significant impact* related to agricultural resources.

Mitigation Measures:

VCIP Energy Resources Plan – Impact AG-1. Implement Mitigation Measure AG-1.

VCIP Infrastructure Plan – Impact AG-1. Implement Mitigation Measure AG-2.

Mitigation Measure AG-1: Protection of Long-Term Agricultural Land Capability

To avoid or substantially reduce any potential temporary and permanent impacts to agricultural land capability of Farmland due to the long-term temporary repurposing of Farmland for solar energy generation and battery energy storage under the VCIP, the following mitigation measures shall be implemented at the project stage:

1. **Leases/Easements Required on Repurposed Farmland and Limitations on Duration:** To ensure that the solar generation and energy storage use of the repurposed farmland will be limited in duration, the development rights for the repurposed lands shall be in the form of long-term leases or easements, and not fee simple. The lease or easement contracts shall specify terms of no longer than 35 years, with the lease or easement terminating upon decommissioning. The leases or easements may be extended but only upon approval of a new land use permit by the approving agency.
2. **Vegetation and Soil Management Plan.** To ensure that lands temporarily repurposed for solar generation and/or energy storage uses are managed to preserve their long-term agricultural capability, each project proponent shall prepare a Vegetation and Soil Management Plan (VSMP) which shall be implemented for the duration of the lease/easement period through completion of decommissioning. The Plan shall include details on the following: 1) soil testing and identification of soil amendments as

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needed; 2) the seed mixture to be used on-site, including native and desirable non-native, low-stature species; 3) pre-project soil preparation and seed application methods; 4) vegetation and soil condition goals, success criteria, monitoring schedule, and reporting requirements; 5) vegetation and soil maintenance procedures, including adaptive management guidelines and reseeding requirements; 6) timing of implementation. The VSMP shall cover the entire solar/BESS facility site including all areas of the property outside the fence lines of the solar arrays, BESS facilities, substations, and O&M facilities. Ongoing implementation of the VSMP shall be coordinated with the ongoing implementation of the Pest Management and Weed Abatement Plan (PMWAP).

3. **Pest Management and Weed Abatement Plan.** To prevent infestations of invasive weed and vertebrate pest species on lands repurposed for solar generation and energy storage uses, each project proponent shall prepare a Pest Management and Weed Abatement Plan (PMWAP) which shall be implemented for the duration of the lease/easement period through completion of decommissioning and site restoration. The PMWAP shall include details on the following: 1) pre-project inventory, mapping, and removal of invasive weed species prior to construction; 2) identification of target weed and pest species to be controlled during facility construction, operation, and decommissioning; 3) best management practices (BMPs) for prevention, monitoring, and adaptive management of weed and pest species; 4) treatment methods including guidelines for use of pesticides and herbicides; 5) reporting requirements. The prescribed weed control methods may include the use of long-term pre-emergent broadleaf herbicides selected for their specificity to target weed species with minimal anticipated impact on the establishment or health of annual grasses planted in accordance with the VSMP. Weed control methods generally shall not include the use of non-selective soil sterilants or other herbicides that result in long-term inactivity or prevent vegetation, and any application of such soil sterilants shall be limited to substations, BESS facilities, internal roads and driveways, and other limited areas required to be maintained as defensible space, to be determined at the project level on a case-by-case basis. The PMWAP shall cover the entire solar/BESS facility site including all areas of the property outside the fence lines of the solar arrays, BESS facilities, substations, and O&M facilities. Ongoing implementation of the PMWAP shall be coordinated with the ongoing implementation of the VSMP.
4. **Decommissioning and Soil Reclamation Plan.** To ensure that lands repurposed for solar generation and battery storage use are restored to a condition suitable for the resumption of agricultural uses, each project proponent shall prepare a Decommissioning and Soil Reclamation Plan (DSRP) which shall be implemented within six months of cessation of operations at the facilities. The DSRP shall include details on the following: 1) description and photographic inventory of the project site and soils prior to the start of initial site disturbing activities; 2) removal of all above-ground and below-ground project fixtures, equipment, foundations, and gravel driveways; 3) grading and tilling to restore surface soils and subgrade soils to a density and depth consistent with their pre-project condition; 4) revegetation of newly exposed soils in accordance with the VSMP. The implementation of the DSRP shall be ensured through the posting of adequate financial assurance by the project proponent prior to issuance of the first building permit for the project, in accordance with the Financial Assurance Requirements below. The DSRP shall include an appendix containing the Engineer's Cost Estimate that specifies the amount of the financial assurance to be provided.
5. **Financial Assurance Requirements.** To ensure implementation of the Decommissioning and Soil Reclamation Plan upon cessation of facility operations, each project proponent shall post an adequate form of financial assurance to the satisfaction of the District or other lead agency with permitting

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authority over the project, as prescribed here: 1) submittal of a cash bond, Certificate of Deposit, letter of credit, or other financial assurance acceptable to the approving agency; 2) the amount of the financial assurance shall be as specified in an Engineer's Cost Estimate for decommissioning in present value, as approved by the approving agency; 3) the amount of the financial assurance shall be reviewed at least every 10 years and within six (6) months of decommissioning and adjusted to reflect the then current cost estimate for decommissioning; 4) the amount of the financial assurance shall be supplemented every 10 years based on the updated Engineer's Cost Estimate, with the final supplement to be provided at the cessation of facility operations, such that the total amount shall be sufficient to cover the full cost of decommissioning and reclamation. The sufficiency of the cost estimate and the financial assurance for purposes of achieving full decommissioning and site reclamation in accordance with the Reclamation Plan shall be determined by the District or other lead agency prior to execution of the deconstruction contract for decommissioning.

6. **Right to Farm Ordinance.** The applicant must acknowledge Fresno 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.

Significance After Mitigation: Significant and Unavoidable Plan-Level Impact.

The mitigation measures listed above would serve to preserve the agricultural capability of the repurposed lands during long-term temporary operation of VCIP solar and energy storage facilities, and would ensure that the repurposed lands are returned fully to a condition suitable for resumption of agricultural production upon decommissioning and reclamation. The temporary impact to Farmland would be expected to be reduced to less-than-significant through ongoing measures to protect and conserve the site soils, and permanent impacts to Farmland would be expected to be avoided by reclamation of the site soils to pre-project conditions. In light of the scope and duration of the long-term temporary modification of the Plan Area for renewable energy facilities and the need for project-level details (e.g., whether the proposed project includes sheep grazing or other ongoing agricultural activities) and site-specific information to assess the appropriateness and feasibility of mitigation measures (e.g., Fresno County General Plan Policy LU-A.23), this impact is conservatively considered *significant and unavoidable* at the plan level.

Mitigation Measure AG-2: Mitigation for Farmland Conversion

Unless exempted by Fresno County pursuant to Fresno County General Plan Policy LU-A.23, to avoid or substantially reduce potential impacts due to permanent conversion of up to 60 acres of Farmland at the proposed location of VCIP Substation No. 5, one or a combination of the following mitigation measures shall be considered for implementation at the project stage to achieve a 1:1 ratio for lands permanently lost to nonagricultural uses as specified below:

- 1) Acquisition of conservation easements at a 1:1 ratio for lands permanently lost to nonagricultural uses.
- 2) Acquisition of fee title of agricultural mitigation land that may be held by a third party or the County, at a 1:1 ratio for lands permanently lost to nonagricultural uses.
- 3) Payment of in lieu fees paid to the County that may be used to acquire future mitigation property, equivalent to a 1:1 ratio for lands permanently lost to nonagricultural uses.

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- 4) Payment of fees paid to mitigation banks for mitigation credits equivalent to a 1:1 ratio for lands permanently lost to nonagricultural uses.
- 5) Other forms of acceptable mitigation with provides the equivalent of a 1:1 ratio for lands permanently lost to nonagricultural uses.

Significance After Mitigation: Significant Unavoidable Impact

The mitigation measures listed above would serve to preserve existing agricultural land but would not create new agricultural lands to fully mitigate for agricultural land permanently lost due to the construction of VCIP Substation 5 at its proposed location. The preservation of off-site Farmland through conservation easements or other measures cannot replace permanently converted Farmland. Therefore, these measures would not avoid or reduce impacts related to Farmland to a less than significant level. Impacts related to agricultural resources would be *significant and unavoidable*.

As discussed above, under Fresno County General Plan Land Use Policy LU-A.23 Farmland Conversion, “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.” This policy also allows the County to exempt 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.” This policy recognizes that potential impacts to agricultural lands should be balanced against the substantial benefits to agriculture that would result from the effective implementation of the District’s GSP, which in this case would be facilitated by the construction of VCIP Substation No. 5. Additionally, by generating up to 21,000 MW per year in furtherance of the state’s renewable energy and climate goals while providing community benefits, implementation of the VCIP would provide substantial and unique environmental, social, and economic benefits that substantially outweigh the conversion of 60 acres. In light of these facts and the unique environmental benefits associated with the VCIP, there is a reasonable basis for not requiring agricultural mitigation for Substation No. 5 at the project-specific level of approval pursuant to General Plan Policy LU-A.23. In addition, in light of the scope and duration of the long-term temporary modification of the Plan Area for renewable energy facilities and the need for project-level details (e.g., whether the proposed project includes sheep grazing or other ongoing agricultural activities) and site-specific information to assess the appropriateness and feasibility of mitigation measures (e.g., Fresno County General Plan Policy LU-A.23), this impact is conservatively considered *significant and unavoidable* at the plan level.

Impact AG-2. Conflict with Agricultural Zoning and Williamson Act

VCIP Energy Resources Plan. The VCIP solar and energy storage facility land uses would be expected to be consistent with the existing Fresno County agricultural zoning for the Plan Area, under which utility-scale solar development that complies with the County’s Solar Facility Guidelines is a conditionally permitted use. Fresno County implements the Williamson Act through contracts with private landowners and assesses compatibility of proposed land uses with those contracts through identified principles and requirements. In light of Fresno County’s role and responsibilities in connection with implementation of the Williamson Act based on site-

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specific information at the project level, this impact is conservatively considered *significant and unavoidable* at the plan level. (*Significant Unavoidable Impact*)

Development of solar and energy storage facilities on lands subject to Williamson Act contracts would be expected to be consistent with the Williamson Act because they are considered electrical facilities and, as such, are deemed compatible uses within any agricultural preserve. Construction of solar generation and energy storage facilities on lands under Williamson Act contracts would not be expected to conflict with any Williamson Act contract. Fresno County implements the Williamson Act through contracts with private landowners and assesses compatibility of proposed land uses with those contracts through identified principles and requirements. In light of Fresno County's role and responsibilities in connection with implementation of the Williamson Act based on site-specific information at the project level, this impact is conservatively considered *significant and unavoidable* at the plan level. (*Significant Unavoidable Impact*).

VCIP Infrastructure Plan. Under the Fresno County Zoning Ordinance, electrical substations, gen-tie lines, and transmission lines are allowable uses in the Agricultural zone subject to an Unclassified Conditional Use Permit. Therefore, implementation of the VCIP Infrastructure Plan would not be expected to conflict with agricultural zoning. (*No Impact*)

Under the Williamson Act, electrical facilities are deemed compatible uses within any agricultural preserve. Construction of VCIP substations, gen-tie lines, and transmission lines would not be expected to conflict with any Williamson Act contract. Fresno County implements the Williamson Act through contracts with private landowners and assesses compatibility of proposed land uses with those contracts through identified principles and requirements. In light of Fresno County's role and responsibilities in connection with implementation of the Williamson Act based on site-specific information at the project level, this impact is conservatively considered *significant and unavoidable* at the plan level. (*Significant Unavoidable Impact*)

VCIP Energy Resources Plan – Analysis of Impact AG-2

Agricultural Zoning

Almost all DFA lands are currently zoned "Exclusive Agricultural, 20-acre minimum parcel size (AE-20)" by Fresno County. In the western portions of the Plan Area, some DFA lands are zoned AE-40 (40-acre minimum parcel size). These Agricultural zoning designations do not specifically allow for solar PV facilities or energy storage facilities; however, under chapter 808.2 of the Fresno County Zoning Ordinance, "public utility facilities" are allowable uses in the Agricultural zones subject to a Conditional Use Permit. Additionally, under Fresno County Zoning Ordinance Section 842.5.020.B, utility-scale solar facilities and other renewable energy projects are permitted through the County's Unclassified Conditional Use Permit (UCUP) process subject to the County's Solar Facility Guidelines. Since the VCIP solar and energy storage projects would not be substantially different from similar projects previously approved under the Solar Facility Guidelines in Fresno County, and since they would implement all County Solar Facility Guidelines requirements such as preparation of Reclamation Plans and Pest Management Plans, VCIP projects would be permissible with UCUPs consistent with the County's agricultural zoning.⁵ Therefore, the implementation of the VCIP Energy Resources Plan would have *no impact* in terms of conflict with agricultural zoning.

⁵ See Section 4.11 *Land Use and Planning* for a detailed analysis of consistency of the typical VCIP project with Fresno County's Solar Facility Guidelines.
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Williamson Act

Within the VCIP Development Focus Areas, there are approximately 64,340 acres under Williamson Act contracts, accounting for about 44 percent of the total DFA acreage. There are approximately 640 acres of DFA lands under Farmland Security Zone contracts, and there are no DFA lands upon which contract Non-Renewal notices have been recorded. Approximately 75,240 acres, or 55 percent of DFA lands, are not enrolled in the Williamson Act Program, of which all but 3,040 acres are owned by the District. When the District acquired these lands, any existing Williamson Act contracts on these lands were rendered null and void under the Government Code since public agencies may not be parties to Williamson Act contracts.

Contracted Lands

Under the Williamson Act, the development of VCIP solar and energy storage facilities would be permitted to occur on contracted lands if such facilities are deemed compatible uses. Government Code section 51238(a)(1) provides that unless the Fresno County Board of Supervisors “makes a finding to the contrary, the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve.” Thus, locating solar generation and related storage facilities (i.e., electric facilities) on land within an agricultural preserve may be allowed as a compatible use depending on the local rules governing compatibility (CEC 2023c). The Fresno County Board of Supervisors adopted the “Interim Program Guidelines and Procedures” (County Guidelines) (Fresno County 2004), which include rules related to compatible uses on lands under Williamson Act contracts. The County Guidelines set forth an overarching compatibility standard: “Pursuant to the Williamson Act, the use of enrolled lands and improvements shall be limited to commercial agricultural uses or uses determined to be compatible or incidental to commercial agriculture.” Apart from housing or agricultural housing incidental to a commercial agricultural use, the County Guidelines are silent regarding other uses which may be deemed compatible with or incidental to commercial agriculture. Thus, the proposed VCIP facilities are deemed compatible uses if they are “determined to be compatible or incidental to commercial agriculture.”

The VCIP’s compatibility must be understood in light of the District’s unique role in promoting commercial agriculture in Fresno County and the VCIP’s objectives related to water supply and commercial agriculture. The District’s mission is to provide timely, reliable and affordable water services to landowners and water users in western Fresno and Kings Counties. These water services include the sustainable management and delivery of water supply, as well as the provision of ongoing education, advanced technology and innovative methods for environmental conservation. The District primarily provides water deliveries to commercial agricultural growers and helps maximize the beneficial use of all water delivered. Consistent with the District’s mission and responsibilities to its landowner-members, a primary purpose of the VCIP is to support and ensure the sustainability of commercial agriculture within the overall farming units within the Plan Area through long-term but temporary repurposing of farmlands within the DFAs. Due to chronic and increasing water supply shortages, over the last ten years, an average of 189,640 acres of land have been fallowed each year within the Plan Area. These existing conditions of widespread fallowing and reduced water supply reliability undermine commercial agriculture on contracted lands within Plan Area. The VCIP would positively address these fundamental challenges by promoting repurposing of farmland and facilitating the redirection of scarce surface water allocations to other productive agricultural land within the District. The objective of these efforts is to maintain viability of the farming units through temporary repurposing of farmland which would be subject to long-term fallowing in any event. Additionally, as provided in AB 2661, electricity generated by the VCIP “shall be used for the Westlands Water District for its own purposes,” which are fundamentally compatible or

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incidental to commercial agriculture. For these reasons, implementation of the proposed VCIP would be compatible with and ultimately designed to promote commercial agriculture.

The VCIP's compatibility with any contracted lands is also supported by an analysis of the principles of compatibility under the Williamson Act. These three principles of compatibility, set forth in Government Code Section 51238.1(a), are provided below, along with a discussion of the potential VCIP solar and energy storage projects' consistency with each.

- 1) "The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves" (Gov. Code, section 51238.1(a)(1)).

Consistency:

As discussed in detail under Impact AG-1, the solar and energy storage use of the DFA lands would be limited by the predicted useful life (and lease/easement terms) of these facilities, which is anticipated to be 35 years. Upon decommissioning, the lands would be restored to pre-project conditions through implementation of a County- or District-approved Reclamation Plan, which would be guaranteed by the posting of performance bonds or other forms of financial surety. Any conditional use permits issued by the County for solar and energy storage projects would be temporary and would expire upon termination of the solar lease, with the termination date to be specified in the Reclamation Plan. This reflects the County's objective that the solar and energy storage uses will be temporary, albeit long term, in nature.

The long-term temporary duration of the solar use is also reflected in the type of land transactions that would be required with participating landowners in the VCIP. Instead of having the solar developers purchase the land in fee simple, the DFA lands would be subject to leases or long-term easements for solar use, for a term of 35 years, with the explicit provision that these leases/easements will be extinguished upon decommissioning of the solar facilities, with all land rights reverting to the underlying landowner. Modification of these agricultural lands for solar and related facilities represents a management decision for certain agricultural lands within the overall farming unit(s). The farming unit remains intact because the management or fallowing decision enhances the productivity of the overall ongoing agricultural use.

Recognition that the solar and energy storage facilities will be agriculturally compatible and temporary, albeit long-term, in nature is further reflected in the District's Rules and Regulations which provide that agricultural lands modified to a non-irrigable use may retain their eligibility for water supply (i.e., for onsite use and/or for transfer to other agricultural lands in the District) subject to specified conditions, including a requirement that the subject lands either retain their existing agricultural character during the operational life of the project or, upon cessation of project uses, will be returned to a condition suitable for agricultural use. Such water transfers are not permitted unless projects proposed on the modified lands are subject to use permits with a defined expiration date, and have approved Decommissioning Plans backed by financial assurances. Thus, both the District and the County have established mechanisms and measures to ensure that the temporary solar use will not significantly compromise the long-term productive agricultural capability of any contracted parcel within the DFAs.

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Similarly, implementation of the VCIP would also not significantly compromise the long-term productive agricultural capacity of contracted parcels outside the DFAs. Instead, because implementation of the VCIP would enhance the productivity of the overall farming units within the Plan Area by facilitating the redirection of scarce surface water allocations to other productive agricultural land within the District, the VCIP will improve the long-term productive agricultural capacity of these other contracted lands.

- 2) “The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted land in the agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping” (Gov. Code, section 51238.1(a)(2)).

Consistency:

Due to chronic shortages of CVP contract water deliveries and reduced water supply reliability, over the last ten years, an average of 189,640 acres of land has been fallowed in the Plan Area each year. As provided under Impact AG-1, this baseline rate of fallowing is expected to increase and already substantially exceeds the acreage of potentially repurposed lands within the DFAs (136,000 acres total). As such, an objective of the VCIP is to prioritize potential projects on farmlands that have been fallowed or removed from irrigated agriculture due to lack of reliable water supply. In recognition that it is not feasible and therefore not reasonably foreseeable to maintain agricultural operations on all parcels in the Plan Area, the VCIP represents a management decision to strategically repurpose certain agricultural lands to enhance agricultural productivity within the overall farming unit(s). By repurposing farmland under the VCIP, scarce surface water allocations would be redirected to other productive agricultural land within the District. This management strategy will help avoid haphazard fallowing decisions and provide a necessary buffer against the existing conditions that threaten to displace or impair current operations on other parcels. Also, before implementing any potential VCIP project, the applicant would have to acknowledge the County’s Right to Farm Ordinance and record a Right to Farm Notice prior to issuance of any permits. Recording this Right to Farm Notice would further ensure that agricultural operations on other contracted lands would not be affected. For these reasons, during its operational life, the VCIP would not significantly displace or impair current or reasonably foreseeable agricultural operations.

Upon decommissioning the potential VCIP facilities after 35 years of operation, the mechanisms put in place to ensure that the subject lands are restored to a condition suitable for the resumption of agricultural uses, as summarized under item 1 above, ensure that VCIP projects would not significantly displace reasonably foreseeable agricultural operations on those lands. Instead, the temporary use of the subject lands for non-agricultural uses would facilitate the continued viability of the larger farming units and therefore relates directly to the agricultural production on the remainder of the farming units on neighboring lands.

- 3) “The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use” (Gov. Code, section 51238.1(a)(3)).

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Consistency:

As discussed in item 2, the temporary use of a portion of the farming unit for non-agricultural uses would enhance the productivity of the larger farming units and therefore help them remain in agricultural production, and thus would prevent the removal of the adjacent contracted land from agricultural use. For adjacent contracted lands that are not part of the larger farming unit, the solar and related facilities would not conflict with adjacent agricultural operations, as discussed in detail under Impact AG-3. Therefore, it is unlikely that VCIP solar and energy storage facilities would undermine the viability of agricultural operations on adjacent contracted lands and thereby lead to their conversion to non-agricultural uses.

In summary, the long-term temporary use of contracted VCIP lands for solar and related uses would be expected to be consistent with three principles of compatibility under the Williamson Act. Therefore, the implementation of potential VCIP energy/storage facilities on lands under Williamson Act contracts would not be expected to conflict with any Williamson Act contract. Fresno County implements the Williamson Act through contracts with private landowners and assesses compatibility of proposed land uses with those contracts through identified principles and requirements. In light of Fresno County’s role and responsibilities in connection with implementation of the Williamson Act based on site-specific information at the project level, this impact is conservatively considered *significant and unavoidable* at the plan level. (*Significant Unavoidable Impact*).

For informational purposes, it is noted that AB 1156, which relates to solar-use easements and Williamson Act contracts, was passed by the California State Assembly on June 3, 2025, and is currently being considered by the State Senate. (For a description of solar use easements, see Section 4.2.2. *Regulatory Context*). The bill would, among other things, revise the definition of “solar-use easement” under the Williamson Act and would expand the authorized uses of the land under the easement to include solar energy storage and appurtenant renewable energy facilities. The bill would revise the conditions under which land subject to a Williamson Act contract may be subject to a solar-use easement and would require conversion of the Williamson Act contract into a solar-use easement for the defined term rather than rescission of the contract, if the Department of Conservation determines that the parcel is eligible to be placed in the easement. While this PEIR does not rely on the pending legislation, it is noted that the passage of AB 1156 would further support the conclusion that implementation of the proposed VCIP would not be expected to conflict with any Williamson Act contracts at the project level.

VCIP Infrastructure Plan

Agricultural Zoning

The elements of the VCIP Infrastructure Plan (collection substations, gen-tie lines, connector transmission lines) are all located in Fresno County. Within Fresno County, all infrastructure elements would be located on lands that are designated for agricultural land uses under the County General Plan and Zoning Ordinance. Under chapter 808.2 of the Fresno County Zoning Ordinance, “public utility facilities” are allowable uses in the Agriculture zone subject to a Conditional Use Permit. Under Section 842.5.020(B), “public utility and public services, structures, and uses” are allowed subject to an Unclassified Conditional Use Permit (Fresno County 2024a). Therefore, the VCIP collection substations, gen-tie lines, and connector transmission lines to be located in the Agricultural zones in Fresno County, as planned, would be in conformance with the applicable agricultural zoning of the County Zoning Ordinance. Implementation of the VCIP Infrastructure Plan would have *no impact* in terms of conflict with agricultural zoning.

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Williamson Act

The elements of the VCIP Infrastructure Plan (gen-tie lines, transmission lines) would occupy or traverse lands subject to Williamson Act contracts. None of the five planned VCIP collection substations would occupy lands under Williamson Act contract. The gen-tie lines and internal VCIP transmission lines would mainly traverse non-contracted lands in the eastern portions of the Plan Area, but would cross some contracted lands in the western and southern portions of the Plan Area, as well as isolated parcels dispersed elsewhere in the Plan Area. These gen-tie lines and internal VCIP transmission lines would traverse contracted lands both within and outside of the proposed DFAs, with very few contracted lands traversed in the DFAs.

Government Code section 51238(a) provides that “unless the board or council . . . makes a finding to the contrary, the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing are hereby determined to be compatible uses within any agricultural preserve.” The Fresno County Williamson Act Guidelines do not specifically restrict the above uses and broadly provide that “the use of enrolled lands and improvements shall be limited to commercial agriculture or uses determined to be compatible or incidental to commercial agriculture.”

As provided in detail above, implementation of the VCIP is expected to be compatible with and intended to promote commercial agriculture within the Plan Area (see the discussion regarding the compatibility of the proposed VCIP Energy Resources Plan with Williamson Act contracts). The VCIP Infrastructure Plan would be integral to VCIP implementation and achieving the VCIP’s objectives related to water supply and facilitating the redirection of scarce water supplies to enhance commercial agricultural production. As such, the VCIP Infrastructure Plan facilities would be expected to be compatible with any contracted lands. If elements of the VCIP Infrastructure Plan are located on or traverse contracted lands within the DFAs, then the implementation of those elements would be expected to be consistent with such Williamson Act contracts due to the compatibility of both the VCIP Infrastructure Plan and VCIP Energy Resources Plan facilities with those contracts.

If gen-tie lines and internal VCIP transmission lines traverse contracted lands within the Plan Area but are outside of the DFAs, then these facilities would also be expected to be compatible with such Williamson Act contracts due to the small footprint of these facilities and their compatibility with commercial agriculture. For example, in approving the Jayne Ave Gen-Tie project (Initial Study Application No. 7635 and Unclassified Conditional Use Permit Application No. 3650), Fresno County found that the proposed gen-tie line to be a compatible use with the subject Williamson Act contract (Fresno County 2019b). In this project, most of the parcels where the gen-tie easement was proposed were restricted by a Williamson Act contract. However, due to the small footprint of the transmission towers, and because the towers were proposed to support the generation of renewable energy, they were considered to be a compatible use with the contract. In light of Fresno County’s role and responsibilities in connection with implementation of the Williamson Act based on site-specific information at the project level, however, this impact is conservatively considered *significant and unavoidable* at the plan level.

Overall Impact of the VCIP Related to Agricultural Zoning and Williamson Act

As discussed above, the implementation of both the VCIP Energy Resources Plan and the VCIP Infrastructure Plan would not be expected to have significant project-level impacts in terms of conflicts with agricultural zoning or the Williamson Act. In light of Fresno County’s role and responsibilities in connection with implementation of the Williamson Act based on site-specific information at the project level, however, this impact is conservatively considered *significant and unavoidable* at the plan level.

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Mitigation Measures:

VCIP Energy Resources Plan – Impact AG-2. Implement Mitigation Measures AG-1 and AG-2, as applicable.

VCIP Infrastructure Plan – Impact AG-2. Implement Mitigation Measures AG-1 and AG-2, as applicable.

Impact AG-3. Land Use Conflicts Resulting in Potential Conversion of Farmland to Non-Agricultural Uses

VCIP Energy Resources Plan. The potential land use conflicts resulting from constructing the VCIP solar and energy storage facilities adjacent to ongoing agricultural operations on Farmlands would not directly or indirectly result in the conversion of those adjacent Farmlands to non-agricultural uses. (*Less-than-Significant Impact*)

VCIP Infrastructure Plan. Construction of the VCIP collector substations, gen-tie lines, and connector transmission lines would not directly or indirectly result in the conversion of adjacent Farmlands to non-agricultural uses. (*Less-than-Significant Impact*)

VCIP Energy Resources Plan – Analysis of Impact AG-3

Most of the lands surrounding the VCIP Development Focus Areas are in active agricultural production.

Typical urban land uses such as residential development can introduce impacts to agricultural operations resulting from trespassing, vandalism, theft of produce, air pollution, and noise from increased traffic. The potential for accidents between slow-moving farm vehicles and fast-moving cars and trucks can also increase. Proximity to urban uses can also result in restrictions on agricultural practices, such as limitations on aerial application of seeds, fertilizers, and pesticides.

Solar facilities represent a far less intensive use of the land than residential and other urban land uses in terms of their potential effects of neighboring agricultural operations. The operation of solar facilities involves a small number of permanent staff, who would be unlikely to trespass, vandalize, or steal crops. The very low intensity of solar operations also translates into very low traffic generation, along with negligible increases in noise or air pollution. The insubstantial increment of traffic generation would also minimize the potential for accidents between project vehicles and slow-moving farm equipment and vehicles which may occasionally travel public roadways. Therefore, the operation of the VCIP solar and energy storage facilities would have little or no direct negative effects on surrounding farming operations.

To provide physical separation between the VCIP renewable energy projects and neighboring agricultural operations, the projects would include a minimum 50-foot buffer zone between the external project boundaries and the nearest solar arrays and other project structures, as required by Fresno County. In addition to the required 50-foot buffers, in many instances additional separation would be provided by rights-of-way for County roads and water conveyance features.

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Grading and construction for solar facility development would expose soils to wind erosion and increase the potential for dustfall on agricultural crops located downwind. Increased dustfall could inhibit photosynthesis and result in reduced crop yields. However, implementation of dust control measures during construction, as would be required for all VCIP projects in Dust Control Plans required by the SJVAPCD, would reduce potential dust impacts to less-than-significant levels.⁶

Development of the solar and energy storage facilities could also result in the introduction of invasive weed species and animal pests to the area, which could negatively affect nearby farmlands. However, the potential for invasive weed species and pests would be minimized at all VCIP projects through implementation of the Pest Management Plans (PMPs) required under the Fresno County Solar Facility Guidelines. Implementation of the PMPs would reduce the potential impact of invasive weed species and pests to less-than-significant levels.

Conversely, the solar facility operator would not have the right to complain to adjacent farm operators about noise and dust from farming operations. By locating solar operations in the midst of an agricultural area, proponents of solar facilities must accept a certain degree of annoyance and inconvenience associated with nearby agricultural operations. This is clearly provided for in the County's "Right-to-Farm Ordinance," described in detail in Section 4.2.2. *Regulatory Context* above, which requires acknowledgement of the right of growers to conduct customary farming operations and practices without restriction. The recordation of this acknowledgement is required as a condition of any project approval. Therefore, it is unlikely that conflicts would arise between the VCIP facility operators and adjacent agricultural operations as to undermine the viability of the agricultural operations and thereby lead to their conversion to non-agricultural uses.

It is unlikely that VCIP renewable energy development would induce owners of nearby lands to convert their farmlands to solar or energy storage use by way of facilitating such development through installation of supporting infrastructure. The VCIP solar and energy storage facilities would not include electrical infrastructure with excess capacity that could be used to support other solar generating facilities on adjacent farmland outside of the VCIP Development Focus Areas. The VCIP Infrastructure Plan is designed to provide only sufficient capacity to serve the needs of the VCIP renewables development. VCIP implementation would not result in construction of new roadways beyond internal maintenance driveways, and thus would not provide new vehicular access to adjacent lands. Since development under the VCIP would not include any excess infrastructure service capacity that could serve adjacent land, it would not induce the owners of such lands to remove them from agricultural use by reason of available surplus infrastructure capacities.

Unlike urban development, the VCIP solar generating and storage facilities would not induce other development nearby, either for the purpose of providing support services to VCIP facilities or for taking advantage of services provided by the VCIP facilities. Solar generating and storage facilities neither provide nor require urban services and therefore would not attract or induce other development nearby. Moreover, such urban development would not be permitted on adjacent or nearby lands under the applicable general plan policies and agricultural zoning, and thus VCIP implementation would not result in the conversion of adjacent farmland through urban growth inducement.⁷

As there is little or no potential that implementation of the VCIP Energy Resources Plan would directly or indirectly result in the conversion of adjacent farmlands to non-agricultural uses, this impact would be *less than significant*.

⁶ For a full discussion, see Section 4.3. *Air Quality* under Impact AQ-1.

⁷ For further discussion, see Section 7.2. *Growth-Inducing Effects of the Proposed Project*.
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VCIP Infrastructure Plan – Analysis of Impact AG-3

The elements of the VCIP Infrastructure Plan (collection substations, gen-tie lines, connecting transmission lines) would be located adjacent to existing agricultural operations in many instances. The VCIP collection substations would be self-contained with tall perimeter fencing, and the enclosed areas would include large structural elements on concrete pads set among graveled yards with paved driveways and parking areas. The substations may include several operational employees, but the overall level of activity would be very light. The substations would not conflict with adjacent agricultural activities and thus they would not directly or indirectly result in the conversion of adjacent farmlands to nonagricultural uses.

The routes of the gen-tie lines serving VCIP solar and energy storage facilities have not been defined since their ultimate alignments will depend on the pattern and timing of solar and energy storage development under VCIP. However, based on the location and configuration of DFA lands, it is reasonable to assume that most of the gen-tie lines will be routed through DFA lands although some segments will likely need to bridge non-DFA lands to serve noncontiguous project sites within the DFAs. For gen-tie segments that will run through DFA lands, it is expected that their alignments would be accommodated in the site plans for the related solar and energy storage projects and would have no effect on nearby farmlands.

For gen-tie segments that would be routed through non-DFA lands, it is expected that these segments would be routed adjacent to existing County roads and farm roads on section lines and half-section lines to the extent practicable. The intent would be to follow routes where agricultural lands have already been bisected by existing public roadways and farm roads to minimize disturbance of previously undisturbed farming operations. The footprints of the gen-tie lines would be very small, with approximately 0.2 acre of temporary ground disturbance at each tower site during construction, and 0.02 acre of long-term displacement by the towers following construction and restoration of the construction zones. The gen-tie towers would be spaced at least 800 feet apart. Continued cultivation would be allowed within the gen-tie easements except for a small clearance area around each tower, and the landowners would be fully compensated for any damage to crops or improvements as specified in the easement agreements. The agricultural acreage displaced at the widely dispersed tower sites would be insubstantial and would not have a significant adverse effect the overall viability of any farming operation. Therefore, the placement of monopoles on small parcels located at intervals along an agriculture operation would not result in the conversion of the adjacent farmlands to non-agricultural uses, and the impact in this regard would be *less than significant*.

The VCIP connector transmission lines would also largely be routed through DFA lands where their alignments would be planned in coordination with site planning for adjacent solar and energy storage projects, and where they would not directly affect agricultural operations. Some transmission line segments would pass through non-DFA lands with ongoing agricultural operations. As is the case with gen-tie routing, the alignment of these transmission segments would be planned to follow existing rights-of-way for public roads, as well as along farm roads on section lines or mid-section lines, to avoid bisecting farm fields to the extent feasible. The tower footprints would be small, with approximately 1.0 acre of temporary ground disturbance at each tower site during construction, and 0.1 acre of long-term displacement by the towers following construction and restoration of the construction zones. The transmission towers would be spaced approximately 1,000 feet apart on average. Continued cultivation would be allowed within the transmission easements except for a small clearance area around each tower, and the landowners would be fully compensated for any damage to crops or improvements as specified in the easement agreements. The agricultural acreage displaced at the widely dispersed tower sites would be insubstantial and would not have a significant adverse effect on the overall viability of any farming operation. Therefore, the placement of transmission towers on small parcels

located at intervals along the frontage of an agriculture operation would not result in the conversion of the adjacent farmlands to non-agricultural uses, and the impact in this regard would be *less than significant*.

Overall Impact of the VCIP Related to Conversion of Adjacent Farmland to Non-Agricultural Uses

Implementation of both the VCIP Energy Resources Plan and the VCIP Infrastructure Plan would have less-than-significant impacts related to potential land use conflicts with ongoing agricultural operations on Farmlands, and thus would not directly or indirectly result in the conversion of those adjacent Farmlands to non-agricultural uses. The overall impact of VCIP implementation in this regard would be *less than significant*.

Mitigation Measures:

VCIP Energy Resources Plan – Impact AG-3. No mitigation is required.

VCIP Infrastructure Plan – Impact AG-3. No mitigation is required.

Impact AG-4. Loss of Forest Land, Conflicts with Zoning for Forest Land or Timberland, or Potential Conversion of Forest Land to Non-Forest Use

VCIP Energy Resources Plan. Implementation of the VCIP Energy Resources Plan would not directly result in the loss of forest land, would not conflict with zoning for forest land or timberland, and would not indirectly result in the conversion of forest lands to non-forest uses. (*No Impact*)

VCIP Infrastructure Plan. Implementation of the VCIP Infrastructure Plan would not directly result in the loss of forest land, would not conflict with zoning for forest land or timberland, and would not indirectly result in the conversion of forest lands to non-forest uses. (*No Impact*)

VCIP Energy Resources Plan – Analysis of Impact AG-4

There are no lands within the Plan Area or vicinity that are zoned forest land, timberland, or Timberland Production under the applicable statutes. No portions of the Plan Area are zoned for forestland or timberland, according to the Fresno County Zoning maps (Fresno County 2025b). As such, implementation of the VCIP Energy Resources Plan would have *no impact* with respect to conflict with existing zoning for such land, or in terms of causing the rezoning of such lands.

The entire Plan Area consists of agricultural land, and there is no forest land within the Plan Area or in the vicinity. As such, the implementation of the VCIP Energy Resources Plan would have *no impact* in terms of loss or conversion of forest land.

VCIP Infrastructure Plan – Analysis of Impact AG-4

The VCIP collection substations, gen-tie lines, and connector transmission lines are all located within the Plan Area. As discussed above, the Plan Area includes no lands zoned forest land, timberland, or Timberland Production under the applicable statutes. As such, implementation of the VCIP Infrastructure Plan would have

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no impact with respect to conflict with existing zoning for such land, or in terms of causing the rezoning of such lands.

The entire Plan Area consists of agricultural land, and there is no forest land within the Plan Area or in the vicinity. As such, implementation of the VCIP Infrastructure Plan would have *no impact* in terms of loss or conversion of forest land.

Overall Impact of the VCIP on Forest and Timberland

Implementation of the VCIP Energy Resources Plan and VCIP Infrastructure Plan would not directly result in the loss of forest land, would not conflict with zoning for forest land or timberland, and would not indirectly result in the conversion of forest lands to non-forest uses. Therefore, VCIP implementation would have *no impact* overall in this regard.

Mitigation Measures:

VCIP Energy Resources Plan – Impact AG-4. No mitigation is required.

VCIP Infrastructure Plan – Impact AG-4. No mitigation is required.

4.2.3.2. TRANSMISSION CORRIDORS OUTSIDE THE VCIP

The transmission corridors for delivery of solar generation from VCIP projects to urban electricity markets in northern and southern California have been identified at a conceptual level in this PEIR to allow a general discussion of environmental impacts associated with transmission line development in these corridors for informational purposes. These transmission delivery corridors extend far beyond the District’s boundaries and are not part of the proposed VCIP. Planning and approval of these outside transmission lines are under the jurisdiction of state and federal energy regulatory agencies public utilities, and the counties and cities traversed by the corridors. The following discussion provides an overview of potential impacts of the outside transmission lines upon agriculture and forestry resources.

Agricultural Resources

Farmland Conversion

The delivery transmission lines extending outside the Plan Area to regional load centers would have a total corridor length of approximately 348 miles, of which about 96 miles would pass through Farmlands composed of “Prime Farmland,” “Farmland of Statewide Importance” and “Unique Farmlands.” As shown in Table 4.2-3, construction of the delivery transmission lines would result in temporary disturbance of approximately 1,155 acres of Farmland at tower construction sites, pulling and tensioning sites, and staging areas. Upon completion of transmission line construction, most of these lands would be restored and returned to agricultural use. During operation of the transmission lines, the transmission towers would each occupy 0.1 acre, and would result in the total long-term use of 81 acres at the 809 tower sites located on Farmland.

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It is anticipated that the delivery transmission lines would not be decommissioned. Those lines would continue to serve as essential backbone infrastructure for the state and federal transmission systems. Therefore, the small parcels of Farmland occupied by the transmission towers would not be reclaimed. However, the displacement of 81 acres of Farmland dispersed over 96 miles at 809 separate disturbance sites of 0.1 acre each would not adversely affect agricultural production on the adjacent farming operations and would represent an insubstantial loss of Farmland across the 10 affected counties. Therefore, the impact of the transmission lines outside the Plan Area upon agricultural resources would be *less than significant*.

TABLE 4.2-3
TRANSMISSION LINES OUTSIDE VCIP PLAN AREA – FARMLAND DISTURBANCE ESTIMATES¹

| Transmission Project Feature | Quantities | | Farmland* | Disturbance (Acres) | |
|--------------------------------|--------------------|------------------|------------------------|---------------------------------------|-------------------------|
| | Total T-Line | Farmland* Only | Total Disturbance Area | Temporarily Disturbed/ To be Restored | Disturbed for Long-Term |
| Tower Sites | 3,020 ² | 809 ³ | 809 ⁴ | 728 | 81 ⁵ |
| Pulling/Tensioning Sites | 275 ⁶ | 74 ⁷ | 296 ⁸ | 296 | 0 |
| Staging/Material Storage Sites | 35 ⁹ | 10 ¹⁰ | 50 | 50 | 0 |
| Totals | -- | | 1,155 ac. | 1,074 ac. | 81 ac. |

Footnotes:

- ¹ Total length of outside transmission line is approximately 547 line miles.
- ² Towers at 5 towers per line mile. (547 line miles X 5 towers per mile = 2,735 towers; + 10% extra towers for turns and crossings = 274 towers; Total = 3,009 towers sites.)
- ³ Total line miles in Farmland = 147 line miles X 5 = 735 tower sites +74 towers (10% for turning and crossing points) = 809 tower sites.
- ⁴ Temporary disturbance area at each tower site = up to 1.0 acre , i.e., temporary clear areas = up to 210 X 210 feet.
- ⁵ Long-term disturbance area at each tower site = 0.1 acre, i.e., permanent clear areas = 65 X 65 feet.
- ⁶ Pulling/Tensioning sites are two miles apart. (549 line miles / 1 site per 2 miles = 275 sites).
- ⁷ Pulling/Tensioning sites in Farmland (147 line miles / 1 site per 2 miles = 74 sites)
- ⁸ Pulling/Tensioning sites estimated to disturb an average of 4 acres at each site.
- ⁹ One staging site per 10 miles of corridor over 348 corridor miles = 35 staging sites. Each staging site is 5 acres.
- ¹⁰ One staging site per 10 miles of corridor over 96 corridor miles in Farmland = 10 staging sites. Each staging site is 5 acres.
- * As mapped by the Department of Conservation, Farmland Monitoring and Mapping Program in 2020 (CDOC 2023a).
"Farmland" includes Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. Farmland of Local Importance is not included in the definition of "Farmland" per CEQA Guidelines Appendix G).

Source: CDOC 2024

Conflicts with Agricultural Zoning or Williamson Act

Regarding agricultural zoning, the delivery transmission lines would pass through the unincorporated areas of 10 counties to the north, west and south of the Plan Area. In each of these counties, the transmission lines would traverse lands zoned for Agriculture. Depending on the county, the zoning ordinances allow utility facilities either as permitted uses, conditionally permitted uses subject to Planning Commission approval, or permitted subject to administrative approval or Planning Commission review (Alameda Co. 2025a, 2025b; Fresno Co. 2024a, 2025b; Kern County 2009, 2025a, 2025b; Kings County 2010a, 2025a, 2025b; LA County 2015, 2025a, 2025b; Merced Co. 2013, 2025a, 2025b; Monterey Co. 2007, 2010, 2025; San Benito Co. 2015b, 2025a, 2025; San Joaquin Co. 2025a, 2025b; Stanislaus Co. 2023, 2025; Lancaster 2025; Palmdale 1992, 2021, 2025). Therefore, the delivery

{00081343.1}

transmission lines outside the Plan Area would not conflict with Agricultural zoning, and there would be *no impact* in terms of conflicts with agricultural zoning.

With respect to the Williamson Act, the north and southbound delivery transmission lines would mainly traverse contracted lands within the San Joaquin Valley. The northern transmission lines would leave the valley floor in the vicinity of the Dos Amigos Pumping Plant and follow the lower slopes of the Diablo Range northward where few lands are under Williamson Act contract. The western transmission corridor mostly traverses mountainous terrain of the Coast Ranges and passes through two small agricultural valleys with Williamson Act contracts. The southern transmission lines would leave the valley floor southeast of Bakersfield and pass over the Tehachapi Range and then cross the Antelope Valley where few lands are under contract. Throughout the mountain areas of the Coast and Tehachapi Ranges, many lands are under contract as non-prime or grazing lands, while the farmlands in the small agricultural valleys are under contract as Prime Farmland. As mentioned above, under Government Code section 51238(a), electrical facilities are deemed to be compatible uses within any agricultural preserve under the Williamson Act, including Farmland Security Zones. The Government Code does not specifically mention transmission lines as the type of electrical facility that would be deemed compatible with a Williamson Act contract. However, local, state and federal jurisdictions have determined that transmission lines are compatible uses under this Government Code section (e.g., Jayne Avenue gen-tie by Fresno County; Darden Solar gen-tie by CEC; San Luis Transmission Project by WAPA; Barren Ridge Renewable Transmission Project by LADWP)(Fresno County 2019, CEC 2025, WAPA 2015, LADWP 2012). In addition, any transmission towers on contracted lands would have a very small footprint (e.g., 0.1 acre each), and the towers would be spaced approximately 1,000 feet apart, so the total area of land disturbance on any given contracted parcel would be insubstantial and would not impede or impair the agricultural use of the contracted land. Therefore, construction of the transmission lines outside the Plan Area would not conflict with the Williamson Act, and there would be *no impact* in this regard.

Potential Conversion of Adjacent Farmland to Non-Agricultural Use

The delivery transmission lines would involve acquisition of easements or permanent rights-of-way outside the Plan Area. Approximately 28 percent of the total length of these transmission corridors would pass over Farmland. Although alignments for the delivery transmission lines have not been set, it is anticipated that they would run parallel and adjacent to existing transmission line corridors for their entire lengths. This route planning approach is consistent with the state's Garamendi Principles, which encourage new transmission lines to follow routes where agricultural lands have already been bisected by existing transmission or transportation corridors to minimize disturbance of farming operations (CEC 2022). As with the VCIP connector transmission lines, the tower footprints would be small, with approximately 1.0 acre of temporary ground disturbance at each tower site during construction, and 0.1 acre of long-term displacement by the towers following construction and restoration of the construction zones. The transmission towers would be spaced approximately 1,000 feet apart on average. Continued cultivation would be allowed within the transmission easements except for a small clearance area around each tower, and the landowners would be fully compensated for any damage to crops or improvements as specified in the easement agreements. The agricultural acreage displaced at the widely dispersed tower sites would be insubstantial and would not have a significant adverse effect on the overall viability of any farming operation. Therefore, the placement of transmission towers on small parcels located at intervals alongside existing transmission lines would not result in the conversion of the adjacent farmlands to non-agricultural uses, and the impact in this regard would be *less than significant*.

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Forestry Resources

The delivery transmission lines extending outside the Plan Area would traverse 10 counties en route to the regional load centers. The planned routes for the outside transmission lines do not pass through any lands which are zoned forest land, timberland, or Timberland Production under the applicable statutes. In addition, no National or State Forests are in the vicinity of the delivery transmission corridors.

The northern transmission route would traverse the San Joaquin Valley floor from the Newpoint Substation northwestward to the vicinity of the Dos Amigos Pumping Plant, where it would cross over I-5 and follow the lower elevations of the Diablo Range north to the Tracy and Tesla Substations. The land cover along the northern transmission route consists primarily of agricultural land on the valley floor, and in the foothill segments it consists entirely of annual grasslands which transitions to blue oak woodlands on the higher terrain to the west. No part of the northern transmission corridor passes through forest lands (USFS 2017). The northern transmission route passes through the counties of Fresno, Merced, Stanislaus, San Joaquin, and would terminate at the Tracy and Tesla Substations in Alameda County. In all of these counties the transmission route would pass through lands zoned Agriculture. Timber harvesting is not a permitted use in Agricultural zones in any of the affected counties (Fresno Co. 2024c; Merced Co. 2025a; Stanislaus Co. 2023; San Joaquin Co. 2025a; Alameda Co. 2025a).

The western transmission corridor would extend westward over the Coast Ranges through San Benito and Monterey counties to Moss Landing on Monterey Bay. The mountainous terrain is covered by a mixture of oak woodland, scrub, and chaparral. In both counties, timber harvesting is permitted in the unincorporated areas (Monterey Co. 2025; San Benito Co. 2025a). Construction of the western transmission line would largely follow the existing transmission line to Moss Landing and would be served by existing access roads. Given the open nature of the woodland along most of the route, the amount of tree removal needed for the new transmission line is anticipated to be insubstantial.

The southern transmission route would extend southward on the San Joaquin Valley floor until reaching the Tehachapi Range southeast of Bakersfield. The transmission route would then run southeastward over the mountains for about 21 miles, running adjacent to the existing SCE 500 kV transmission line. This transmission route passes through the unincorporated areas of the counties of Fresno, Kings, Kern and Los Angeles, and the cities of Lancaster and Palmdale, en route to the Vincent Substation near Acton. In all of the unincorporated county areas, the southern transmission route passes through lands zoned Agriculture (Fresno County 2025b; Kings County 2025a; Kern County 2025b; LA County 2025b). Under the Kern County Zoning Ordinance, permitted uses in Agricultural zones include the growing and harvesting of timber (Kern County 2025a). However, as discussed below, the transmission route through the mountain area passes exclusively through oak woodlands which are protected under the Kern County General Plan Land Use, Open Space, and Conservation Element – Policy 65, in conformance with the State’s oak woodland protection requirements under Public Resources Code 21083.4 (Oak Tree Preservation) (Kern County 2009). In northern Los Angeles County, the transmission route passes exclusively through lands zoned A-2, where timber logging is permitted subject to Site Plan Review (LA County, 2025a). However, as discussed below, the Los Angeles County transmission segment passes through the juniper woodland of the Antelope Valley, a high desert region with sparse coverage of junipers and other desert-adapted species unsuitable for logging (USFS 2017). In the City of Lancaster, the transmission route passes exclusively through lands zoned Rural Residential (Lancaster 2025). In the City of Palmdale, the transmission route partially passes through lands zoned Single-Family Residential, and in the City's Ritter Ranch and Anaverde Nuevo Specific Plan areas it passes through lands designated/zoned Open Space (Palmdale 1992, 2021, 2025). Timber harvesting is not permitted in any of these land use and zoning designations.

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In the 21-mile transmission segment crossing the Tehachapi Range, the alignment traverses two forest ecosystem types including 12 miles of sparsely wooded blue oak woodland, and 9 miles of moderately to densely wooded canyon live oak forest (USFS 2017). Construction of this transmission segment would require little or no removal of trees within the blue oak woodland which consists almost entirely of chaparral in this segment. Within the segment passing through the canyon live oak forest, the construction of the transmission line may require the removal of individual trees at some tower sites, although mature oaks would be avoided to the extent feasible as required under the Kern County General Plan and state law. Since the existing SCE 500-kV transmission line is served by existing tower access roads in the mountain area, the new transmission line would not involve removal of additional trees for access roads.

In northern Los Angeles County, a 78-mile segment of the southern transmission corridor passes through the Antelope Valley where the dominant ecosystem is juniper woodland. This area is characterized by open desert with sparse coverage by junipers and other species endemic to the high desert. Los Angeles County's Antelope Valley Area Plan Policy COS 16.1 states that new development shall: "minimize removal of native vegetation" and "ensure that a large percentage of the land is left in its natural state." Timber harvesting is not a permitted use under the Antelope Valley Area Plan (LA County 2015).

In summary, construction of transmission lines outside the Plan Area would not conflict with zoning for forest land or timberland since no lands within or near the transmission corridors are zoned timberland. The construction of the transmission lines would involve removal of some trees at the tower locations, although mature specimens of oak and other native species would be avoided to the extent feasible as required by local ordinances. Therefore, the outside transmission lines would not directly result in the loss of forest land and would not indirectly result in conversion of forest lands to non-forest uses. Therefore, construction of the delivery transmission lines would have a *less-than-significant impact* on forestry resources.

4.2.3.3. CUMULATIVE IMPACTS

Agricultural Resources

VCIP Energy Resource Plan and Infrastructure Plan

Farmland Conversion

For purposes of this analysis, the scope of potential cumulative impacts related to Agricultural Resources includes the portions of western Fresno and Kings counties located on the San Joaquin Valley floor. In 2018, approximately 1.61 million acres of land in Fresno and Kings counties were classified by the FMMP as Farmland (i.e., Prime Farmland, Farmland of Statewide Importance, and Unique Farmland). Between 2018 and 2020, the acreage of Farmland was reduced by 21,927 net acres, representing a net loss of 1.4 percent over the two-year period (CDOC 2022b, CDOC 2023b). (Farmland conversion data for 2020-2022 had not been published by CDOC as of April 15, 2025.)

The cumulative projects considered in this analysis are listed in Table 4.0-2 and consist mainly of solar PV projects. The total land area covered by these completed, approved, and pending projects is approximately

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39,818 acres, of which non-solar projects comprise about 1,463 acres.⁸ Of this total, approximately 29,792 acres are mapped as Farmlands of Local Importance and other non-Farmland categories (CDOC 2022a, CDOC 2025). Many of these lands consist of former farmlands that were retired by the District. These lands are classified as Farmlands of Local Importance and thus do not qualify as Farmlands under CEQA. Therefore, the development of solar projects and other projects on these lands would not represent a significant impact to agricultural resources, either individually or cumulatively.

The remaining cumulative projects occupy approximately 10,026 acres of Prime Farmland or Farmland of Statewide Importance, which are considered Farmland under CEQA. Of this total, approximately 9,100 acres are or will be occupied by solar or energy storage projects, and 926 acres are the sites of non-solar projects (CDOC 2022a, CDOC 2025). As discussed in detail under Impact AG-1 above, development of PV solar and energy storage facilities on Farmlands in Fresno and Kings counties would not be expected to represent a significant impact at the project level because: 1) the solar and energy storage projects would be constructed and operated in a manner that would result in the preservation of the agricultural soils during the 35-year operating lives of the facilities; and 2) upon decommissioning, all of these projects would implement Reclamation Plans which would restore the soils to pre-project conditions. Long-term preservation of these Farmlands would be ensured through the implementation of Reclamation Plans upon decommissioning, as required by Fresno County, which would restore these farmlands to pre-project conditions and thus facilitate the resumption of agricultural production on those lands. As such, the use of the cumulative sites for solar and energy storage facilities would be temporary, and the lands would be returned to a condition suitable for long-term preservation for agricultural use. The temporary, albeit long-term, repurposing of the cumulative project lands for renewable energy uses would help meet the objectives of the District and the farming community of enhancing the productivity and long-term viability of the larger farming units, and also of furthering implementation of the District's GSP.

An exception to the above applies to projects which were developed in the mid-2010s by PG&E which do not require decommissioning, involving 810 acres of Farmland. Therefore, a total of 1,736 acres of Farmland occupied by cumulative solar and non-solar projects would not be restored (i.e., 926 acres of non-solar projects and 810 acres associated with the subject PG&E projects). While some of these projects may be subject to mitigation in the form of conservation easements, this would not provide full mitigation for the loss of Farmland. Therefore, the permanent conversion of these 1,736 acres of Farmlands represents a *cumulatively significant and unavoidable impact* related to agricultural resources.

As discussed under Impact AG-1, full implementation of VCIP would result in permanent conversion of approximately 47 acres of Farmland along the VCIP gen-tie lines and the connector transmission line, consisting of many small parcels at tower sites distributed over many miles of transmission line. Removal of these small, dispersed parcels of Farmland would not have a significant impact on agricultural resources or operations. The construction of VCIP collector substation No. 5 at its proposed site would result in the permanent conversion of 60 acres of Farmland and this would represent a significant impact to agricultural resources. Unless exempted by Fresno County pursuant to Fresno County General Plan Policy LU-A.23, this impact would be partially mitigated through acquisition of conservation easements or equivalent off-site compensatory mitigation as provided in Mitigation Measure AG-2. Development of the solar PV and energy storage projects would not be expected to result in permanent conversion of farmland since all these sites would retain their essential agricultural characteristics and would be restored upon decommissioning. A total

⁸ Table 4.0-2 includes a total of 72 cumulative projects; however, four of these projects comprise solar/BESS projects within the VCIP DFAs. Since the plan level impacts of DFA development, including these projects, are addressed in the main impact analysis sections of this PEIR, they are not addressed again in the cumulative analyses. {00081343.1}

of 47 dispersed acres of Farmland would be converted for gen-tie and transmission lines, and 60 acres to be converted for a VCIP collection substation, with the latter potentially requiring mitigation to the extent feasible (i.e., partial mitigation) in the form of conservation easements. [Note: Although the County could exempt the conversion of 60 acres of Farmland at VCIP Substation No. 5 from its agricultural mitigation requirements under General Plan Policy LU-A.23, the impact to Farmland would still be significant and unavoidable.] In addition, as discussed above under Impact AG-1, in light of the scope and duration of the long-term temporary modification of the Plan Area for renewable energy facilities and the need for project-level details (e.g., whether the proposed project includes sheep grazing or other ongoing agricultural activities) and site-specific information to assess the appropriateness and feasibility of mitigation measures (e.g., Fresno County General Plan Policy LU-A.23), this impact is conservatively considered *significant and unavoidable* at the plan level. Therefore, the contribution of VCIP implementation to the cumulative impact related to agricultural resources would be considered *cumulatively considerable*, and the overall *cumulative impact would be significant*.

Conflicts with Agricultural Zoning or Williamson Act

As discussed under Impact AG-2 above, implementation of the VCIP Energy Resources and Infrastructure plans would have no impact in terms of conflicts with agricultural zoning or any Williamson Act contracts. As discussed, all proposed VCIP land uses are allowable uses in the applicable Agricultural zones subject to an Unclassified Conditional Use Permit granted under the Fresno County Zoning Ordinance.

As provided in detail under Impact AG-2, the VCIP projects would be expected to be compatible with any Williamson Act contracts for several reasons. Both the VCIP energy and infrastructure projects would be considered electrical facilities that meet the definitions and criteria for compatible uses under the Government Code and Fresno County Williamson Act Guidelines (Gov. Code, sections 51238(a)(1), 51238.1(a)). As discussed, the VCIP is proposed in response to existing challenges of reduced water supply reliability and chronic shortages of CVP contract water deliveries, which have necessitated the fallowing of an average of 189,640 acres per year within the Plan Area over the last ten years and undermine commercial agricultural production on contracted lands. To contribute to the solution to these conditions, a primary objective of the VCIP is to support and enhance commercial agriculture within the overall farming units within the Plan Area. As such, implementation of the VCIP would be expected to be compatible with commercial agriculture and would help ensure the sustainability of commercial agriculture in the Plan Area.

The VCIP energy projects would be expected to be consistent with the three principles of compatibility set forth in Government Code section 51238.1(a). In addition to the reasons provided above, VCIP energy projects would be expected to satisfy the principles of compatibility because they would be temporary, albeit long-term uses that would be managed to conserve the agricultural character of the lands to ensure that they would be returned to agricultural use upon decommissioning and reclamation. As such, the VCIP energy projects would not be expected to result in permanent or temporary conversion of Farmlands.⁹ Recently approved and pending projects in Fresno County further confirm that the VCIP gen-ties, connector transmission lines, and substations would be considered electrical facilities which meet the definitions and criteria for compatible uses under the Government Code and Fresno County Williamson Act Guidelines. As such, VCIP implementation would not be expected to conflict with any Williamson Act contracts. As discussed above under Impact AG-2, however, in light of Fresno County's role and responsibilities in connection with implementation of the Williamson Act based on site-specific information at the project level, this impact is conservatively considered *significant and unavoidable* at the plan level. Therefore, the contribution of VCIP implementation to the

⁹ Although the proposed location of VCIP Substation 5 is on lands classified as Farmland, it is not subject to a Williamson Act contract.
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cumulative impact with respect to conflicts with agricultural zoning or Williamson Act contracts would be considered *cumulatively considerable*, and the overall *cumulative impact would be significant*.

Potential Conversion of Adjacent Farmland to Non-Agricultural Use

As discussed under Impact AG-3 above, VCIP implementation would have a less-than-significant impact in terms of potential to result in conversion of adjacent lands to non-agricultural use. Solar facilities are generally compatible with adjacent agricultural operations, and solar facility operators would be precluded from complaining about neighboring agricultural operations through recordation of a Right-to-Farm acknowledgement on the title of the parcel on which the solar facility is located. In addition, the VCIP Infrastructure Plan would include no surplus transmission capacity that could support conversion of adjacent non-DFA lands to solar and energy storage use.

The cumulative solar and energy storage projects would be very similar to the VCIP projects in terms of compatibility with adjacent agricultural operations. To provide interconnection to the electrical grid, each cumulative project would be served by a dedicated gen-tie line which would be designed and constructed with only enough capacity to serve its associated solar facility. Thus, both the VCIP and other cumulative solar and energy storage facilities would have little or no surplus infrastructure capacity to serve additional solar facilities on adjacent Farmland.

In summary, the potential for the cumulative projects, including the projects developed under VCIP, to result in conversion of adjacent Farmlands represents a *less-than-significant cumulative impact*, and the contribution of VCIP implementation *would not be cumulatively considerable*.

Transmission Corridors Outside the VCIP

As discussed above, the delivery transmission towers would result in the displacement of Farmland at approximately 809 very small sites (0.1 acre each) distributed over 10 counties. In aggregate, the towers would displace a total of 81 acres of Farmland over a corridor length of 96 miles traversing Farmland (or 0.84 acre per mile). These small dispersed displacements would not adversely affect agricultural production on their larger agricultural parcels or adjacent agricultural land, and thus the delivery transmission lines would represent an insubstantial loss of Farmland across the 10 affected counties. Since transmission lines are permitted or conditionally permitted uses in the Agricultural zones in all of the affected counties, there would be no conflict with agricultural zoning. Since transmission lines are compatible uses under the Williamson Act, there would also be no impact in terms of conflicts with any affected Williamson Act contracts. The outside transmission lines also would not conflict with adjacent agricultural operations or result in the conversion of adjacent Farmlands. Therefore, the impact of the delivery transmission lines upon agricultural resources would be less than significant, and the contribution to a cumulative impact would not be considerable. Other cumulative development in the 10 affected counties would occur in accordance with local general plan and zoning. Some of that development would occur on Farmland surrounding existing urbanized areas. The impacts of Farmland conversion would be partially offset by compensatory mitigation, but no feasible measures are available to reduce these impacts to less-than-significant levels. Therefore, the cumulative impacts to agricultural resources would be cumulatively significant. However, as discussed above, the contribution of the outside transmission corridor projects to the cumulative impact would not be cumulatively considerable. Therefore, the impact of construction of the delivery transmission lines outside VCIP relative to agricultural resources would be *cumulatively less than significant*.

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Forestry Resources

VCIP Energy Resources and Infrastructure Plans

As discussed under Impact AG-4 above, no portions of the Plan Area are zoned for forestland or timberland; and there is no forest land within the Plan Area. As such, VCIP implementation would have *no impact* in terms of conflicts with zoning for forestland or timberland and would not result in the loss or conversion of forest land. Therefore, VCIP implementation would not cause or contribute to any cumulative effect related to forestry resources and *no cumulative impact* would occur.

Transmission Corridors Outside the VCIP

As discussed above, no portions of the delivery transmission corridors are zoned for forestland or timberland. Portions of the transmission corridors pass through open woodland in the mountain areas, and some mature trees would be unavoidably removed at new tower sites. The overall impact of tree removals is considered insubstantial and would occur in compliance with local rules and regulations; as such the impact would be less than significant. Construction of the delivery transmission lines would have *no impact* in terms of conflicts with zoning for forestland or timberland, and would have a less-than-significant impact regarding conversion of forest land. Therefore, the transmission lines outside the VCIP would *not make a cumulatively considerable contribution* to any cumulative effect related to forestry resources, and the cumulative impact associated with the outside transmission lines would be *less than significant*.

4.2.4. References – Agriculture and Forestry Resources

- Alameda Co. 2025a Alameda County. *Alameda County Municipal Code*. As of April 15, 2025.
https://library.municode.com/ca/alameda_county/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.06ADI_17.06.030PEUS
- Alameda Co. 2025b Alameda County Community Development Agency. *Zoning Viewer Public Access Map*. As of April 15, 2025.
<https://acpwa.maps.arcgis.com/apps/View/index.html?appid=4a648cb409d744b8a4f645e6e35fe773>
- CDFA 2023 California Department of Food and Agriculture (CDFA). March 2023. *California Agricultural Statistics Review 2021-2022*.
https://www.cdfa.ca.gov/Statistics/PDFs/2022_Ag_Stats_Review.pdf
- CDOC 2016 California Department of Conservation, Division of Land Resource Protection, Conservation Program Support. February 2015. *Fresno County Williamson Act FY 2015/2016 – Sheet 1 of 2*.
ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Fresno_15_16_WA.pdf
[Note: The above link is not currently accessible. For an alternative source, go to:
<https://sjvp.databasin.org/maps/new/#datasets=4603fc7fd42249c8929597489914a84e>]

{00081343.1}

- CDOC 2022a California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP). October 2022. *Kings County Important Farmland 2020*.
<https://filerequest.conservation.ca.gov/RequestFile/2850570>
- CDOC 2022b California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP). December 2022. *Table A-12, Kings County 2018-2020 Land Use Conversion*.
<https://filerequest.conservation.ca.gov/RequestFile/2851629>
- CDOC 2023b California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP). October 2023. *Table A-8, Fresno County 2018-2020 Land Use Conversion*.
<https://filerequest.conservation.ca.gov/RequestFile/2867559>
- CDOC 2023c California Department of Conservation, Division of Land Resource Protection. April 2023. *Solar Power and the Williamson Act*.
<https://www.conservation.ca.gov/dlrp/wa/Documents/lrcc/WA%20Solar%20Power%202023.pdf>
- CDOC 2025 California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP). February 2025. *Fresno County Important Farmland 2022– Sheet 1 of 2 (West)*.
<https://filerequest.conservation.ca.gov/RequestFile/2890295>
- CEC 2022 California Energy Commission (CEC). July 2022. *Instructions for Electric Transmission-Related Data Collection: Final Staff Report (CEC-200-2022-004)*. See Appendix B-1.
<https://www.energy.ca.gov/filebrowser/download/4308>
- CEC 2025b California Energy Commission (CEC). February 2025. *Darden Clean Energy Project Staff Assessment (23-OPY-2)*. https://files.ceqanet.lci.ca.gov/306467-4/attachment/5WtjyZsZvpc9BGQVFJtWzpUn3Jdtvl_AFC-o0YzdOmxJGWOYGllarkPcYRZ-159JpYs60hSh0CclorVr0.
- CSU 2014 Colorado State University Extension (CSU). October 2014. *Managing Saline Soils*. Fact Sheet No. 0.503. <https://extension.colostate.edu/docs/pubs/crops/00503.pdf>
- DWR 2020 California Department of Water Resources (DWR). January 2020. *Groundwater Sustainability Plan – 5-022.9 Westside*. <https://sgma.water.ca.gov/portal/gsp/preview/8>
- DWR 2022 California Department of Water Resources (DWR). July 2022. *Groundwater Sustainability Plan (Clarified and Amended GSP) – 5-022.9 Westside*.
<https://sgma.water.ca.gov/portal/gsp/preview/8>
- DWR 2024 California Department of Water Resources. July 2024. *California Data Exchange Center – Cal Aqueduct Check 21*.

{00081343.1}

<https://cdec.water.ca.gov/dynamicapp/QueryDaily?s=C21&end=2024-07-18&span=2months>

- FAO 2002 Food and Agriculture Organization of the United Nations (FAO). 2002. *Agricultural Drainage Water Management in Arid and Semi-Arid Areas*. FOA Irrigation and Drainage Paper 61. <http://www.fao.org/3/y4263e/y4263e00.htm>
- Fresno County 2000a County of Fresno. February 2000. *Fresno County General Plan Update EIR*. <https://www.co.fresno.ca.us/home/showpublisheddocument/13736/63642198441283000>
- Fresno County 2000b County of Fresno. *Fresno County General Plan – Background Report*. Adopted October 2000. <https://www.co.fresno.ca.us/home/showpublisheddocument/8398/636379166183770000>
- Fresno County 2000c Fresno County. October 2000. *Fresno County General Plan – Policy Document*. <https://www.co.fresno.ca.us/home/showpublisheddocument/18117/636753797422170000>
- Fresno County 2017a County of Fresno. October 2017. *Construction & Demolition Waste Management Plan (WMP)*. <https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/35156-waste-management-plan.pdf>
- Fresno County 2017b County of Fresno. *County of Fresno Solar Facility Guidelines*. As revised by BOS on 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/photovoltaic-facilities-p-1621>
- Fresno County 2017c County of Fresno. October 2017. *Fresno County Master Emergency Services Plan*. <https://www.co.fresno.ca.us/home/showpublisheddocument/30146>
- Fresno County 2019a County of Fresno. April 2017. *Fresno County Local Area Management Program (LAMP)*. <https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/39300-fresno-county-lamp-2019.pdf>
- Fresno County 2019b County of Fresno. November 2019. *Planning Commission Staff Report – Agenda Item No. 2 (Jayne Avenue Gen-Tie)*. <https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/39270-cup-3650-sr-adobe.pdf>
- Fresno County 2020 County of Fresno. February 2020. *Fifth Standard Solar Project Complex – Draft Environmental Impact Report No. 7257*. https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/41320-fifth_standard_solar_project_complex_deir.pdf

{00081343.1}

- Fresno County 2021a County of Fresno. May 2021. *Luna Valley Solar Project – Draft Environmental Impact Report No. 7813*.
https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/55486-luna-valley-solar-deir_05072021.pdf
- Fresno County 2023a County of Fresno Department of Agriculture and Weights and Measures. October 2023. *2022 Fresno County Crop Report*.
<https://www.fresnocountyca.gov/files/sharedassets/county/v/1/agricultural-commissioner/ag-crop-reports/fresno-county-2022-ag-crop-report.pdf>
- Fresno County 2023b County of Fresno. April 2023. *Fresno County General Plan Background Report – Public Review Draft*. <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>
- Fresno County 2023d County of Fresno. September 2023. *Key Energy Storage Project – Draft Environmental Impact Report No. 8189*.
https://www.fresnocountyca.gov/files/sharedassets/county/v/1/public-works-and-planning/development-services/planning-and-land-use/environmental-impact-reports/key-energy-storage/key_energy_storage_project_deir_sep_2023-print.pdf
- Fresno County 2024a Fresno County. February 2024. *Fresno County Comprehensive Zoning Ordinance Update*. <https://www.fresnocountyca.gov/files/sharedassets/county/v/2/public-works-and-planning/development-services/planning-and-land-use/general-plan-review-comments/zoning-ordinance.pdf>
- Fresno County 2024b Fresno County. February 2024. *Fresno County General Plan Policy Document, Final Draft*. https://www.fresnocountyca.gov/files/sharedassets/county/v/3/public-works-and-planning/development-services/planning-and-land-use/environmental-impact-reports/general-plan-review/fcgpr_general-plan_prd-county_01-12_24-clean.pdf
- Fresno County 2024c County of Fresno. February 2024. *Zoning Ordinance of the County of Fresno – Land Use and Planning*. <https://www.fresnocountyca.gov/Departments/Public-Works-and-Planning/divisions-of-public-works-and-planning/development-services-division/zoning-ordinance>
- Fresno County 2025a County of Fresno. February 2025. *Photovoltaic & Energy Storage Projects Submitted to Fresno County – Updated 2/26/25*.
<https://www.fresnocountyca.gov/files/sharedassets/county/v/6/public-works-and-planning/development-services/planning-and-land-use/photovoltaic-solar-facilities/pv-solar-projects-in-process-25-02-26.pdf>
- Fresno County 2025b Fresno County. *Fresno County GIS Portal – Zoning*. Accessed April 10, 2025.
<https://gisportal.co.fresno.ca.us/portal/home/>
- Fresno County 2025c County of Fresno. *Guidelines for Preparing A Solar Electrical Generation Facility Reclamation Plan*. Accessed April 10, 2025.

{00081343.1}

<https://www.fresnocountyca.gov/Departments/Public-Works-and-Planning/divisions-of-public-works-and-planning/development-services-division/planning-and-land-use/photovoltaic-facilities/photovoltaic-facilities-p-3106>

- Kern County 2009 Kern County. September 2009. *Kern County General Plan – Land Use, Open Space, and Conservation Element*.
<https://psbweb.co.kern.ca.us/planning/pdfs/kcgp/KCGPChp1LandUse.pdf>
- Kern County 2025a Kern County. *Kern County Code of Ordinances*. As amended through January 27, 2025.
http://kerncounty-ca.elaws.us/code/coor_title19
- Kern County 2025b Kern County Planning and Natural Resources Department. *Kern County GIS – Planning/Zoning*. Accessed April 10, 2025.
<https://maps.kerncounty.com/H5/index.html?viewer=KCPublic>
- Kings County 2002 Kings County. *Kings County Right to Farm Ordinance*. As amended by Ordinance No. 608, effective March 5, 2002.
<http://www.countyofkings.com/home/showdocument?id=3866>
- Kings County 2010a County of Kings. *2035 Kings County General Plan – Land Use Element*. Adopted January 26, 2010. <http://www.countyofkings.com/home/showdocument?id=3110>
- Kings County 2010b Kings County. *2035 Kings County General Plan – Resource Conservation Element*. Adopted January 26, 2010.
<http://www.countyofkings.com/home/showdocument?id=3112>
- Kings County 2019b Kings County. *Initial Study/Mitigated Negative Declaration – Aquamarine Solar Project and Gen-Tie Line*. Adopted by Planning Commission, September 9, 2019.
<https://www.countyofkingsca.gov/home/showpublisheddocument/22579/637236779876670000>
- Kings County 2020 County of Kings. *County of Kings Implementing Procedures for the California Land Conservation “Williamson” Act of 1965, including Farmland Security Zones*. As updated: October 20, 2020.
<https://www.countyofkings.com/home/showpublisheddocument/24863/637412266027400000>
- Kings County 2025a Kings County. *County of Kings Parcel and Services Map Viewer*. As of April 9, 2025.
<https://kingscomdev.maps.arcgis.com/apps/webappviewer/index.html?id=35c6e6dac50446b9945154c9fc7f46c8>
- Kings County 2025b Kings County. *Kings County Development Code*. As of April 10, 2025.
<https://www.countyofkings.com/departments/community-development-agency/information/zoning-ordinance>
- LA County 2015 Los Angeles County Department of Regional Planning. June 2015. *Antelope Valley Area Plan*. <https://planning.lacounty.gov/long-range-planning/antelope-valley-area-plan/>

{00081343.1}

| | |
|-------------------|--|
| LA County 2025a | County of Los Angeles. <i>Los Angeles County Code of Ordinances</i> . As of January 13, 2025. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances |
| LA County 2025b | Los Angeles County. <i>Los Angeles County Zoning Ordinance</i> . As of January 13, 2025. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO |
| LA County 2025c | Los Angeles County Department of Regional Planning. <i>GIS-NET Public – Planning and Zoning Information for Unincorporated L.A. County</i> . Accessed April 10, 2025. https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public |
| LADWP 2012 | Los Angeles Department of Water and Power(LADWP). September 2012. Barren Ridge Renewable Transmission Project EIS/EIR. Available at https://www.ladwp.com/community/construction-projects/other/barren-ridge-renewable-transmission#final-environmental-impact-statement/environmental-impact-report |
| Lancaster 2025 | City of Lancaster Community Development Department. <i>Lancaster Data – Zoning and Aerial Map</i> . Accessed April 10, 2025. https://opendata-lancasterca.hub.arcgis.com/apps/0dad1680833f41cfb496420fb444a73a/explore |
| Merced Co. 2013 | Merced County. December 2013. <i>2030 Merced County General Plan</i> . https://www.co.merced.ca.us/2018/Adopted-General-Plan |
| Merced Co. 2025a | County of Merced. <i>Merced County Code of Ordinances</i> . As of April 10, 2025. https://ecode360.com/ME4967 |
| Merced Co. 2025b | Merced County. <i>Merced County Zoning Code</i> . As of April 10, 2025. https://ecode360.com/43022872#43022872 |
| Merced Co. 2025c | Merced County. <i>County of Merced GIS Information Portal – Land Use Applications</i> . Accessed April 10, 2025. https://geostack-mercedcounty.opendata.arcgis.com/ |
| Monterey Co. 2025 | Monterey County. 2024. <i>Monterey County Code of Ordinances</i> . As of February 11, 2025. https://library.municode.com/ca/monterey_county/codes/code_of_ordinances?nodeId=TIT1GEPR |
| NRCS 1986 | U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS). September 1986. <i>Soil Survey of Kings County California</i> . http://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/CA031/0/kings.pdf https://books.google.com/books?id=rp2YcTh6Um0C&printsec=frontcover&source=gbs_ViewAPI#v=onepage&q&f=false |
| NRCS 1990 | U.S. Department of Agriculture (USDA), Natural Resources Conservation Service. 1990. <i>Soil Survey of Merced County California, Western Part</i> . |

{00081343.1}

https://www.google.com/books/edition/Soil_Survey_of_Merced_County_California/5dipFTmlx-8C?hl=en&gbpv=1&dq=soil+survey+of+fresno+county,+california,+western+part&pg=PT21&printsec=frontcover

- NRCS 2006 U.S. Department of Agriculture (USDA), Natural Resources Conservation Service. November 2006. *Soil Survey of Fresno County California, Western Part*. <https://archive.org/details/usda-general-soil-map-soil-survey-of-fresno-county-california-western-part/page/n3/mode/1up>
- OEHHA 2010 California Office of Environmental Health Hazard Assessment. December 2010. *Announcement of Publication of Final Public Health Goal for Selenium in Drinking Water*. <http://oehha.ca.gov/water/phg/121010phg.html>
- Palmdale 1992 City of Palmdale Planning Division. February 1992. *Ritter Ranch Specific Plan*. <https://www.cityofpalmdaleca.gov/DocumentCenter/View/608/Ritter-Ranch-PDF>
- Palmdale 2021 City of Palmdale Planning Division. August 2021. *Anaverde Nuevo Specific Plan Amendment*. <https://www.cityofpalmdaleca.gov/DocumentCenter/View/611/Anaverde-Nuevo-PDF>
- Palmdale 2025 City of Palmdale Planning Division. *City of Palmdale - Zoning Lookup*. As of April 15, 2025. <https://experience.arcgis.com/experience/2cc14f305711428f9cf8456a91b095cd/>
- San Benito Co. 2015b San Benito County. July 2015. *San Benito County 2035 General Plan*. <https://edcsanbenito.org/wp-content/uploads/2019/10/Adopted-2035-GPU-2.pdf>
- San Benito Co. 2025a San Benito County. *San Benito County Code of Ordinances*. As of April 15, 2025. https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/sanbenito_ca/0-0-0-5639
- San Benito Co. 2025b San Benito County. *County of San Benito Zoning*. As of April 15, 2025. <https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&suggestField=true&layers=e5489d85d2e5406baf882b135d9fef1a&layerId=0>
- San Joaquin Co. 2025a San Joaquin County. *San Joaquin Development Title Update*. As of April 15, 2025. https://library.municode.com/ca/san_joaquin_county/codes/development_title?nodeId=DETCOSAJOCA
- San Joaquin Co. 2025b San Joaquin County. *District Viewer – Zoning*. As of April 15, 2025. <https://sjmap.org/DistrictViewer/>
- Stanislaus Co. 2023 Stanislaus County. December 2023. Stanislaus County Zoning Ordinance. <https://www.stancounty.com/planning/pl/zoning.shtm>
- Stanislaus Co. 2025 Stanislaus County. *Stanislaus County Open Data – Zoning*. As of April 15, 2025.

{00081343.1}

https://open-data-stancounty-gis.hub.arcgis.com/datasets/c7c6b33a0e234958a49368ac22997451_0/explore?location=37.429826%2C-121.112815%2C11.03

- SWRCB 2018b State Water Resources Control Board (SWRCB), Division of Drinking Water (DDW). October 2018. *Secondary Drinking Water Standards*. https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/ddw_secondary_standards.pdf
- USBR 2006 U.S. Bureau of Reclamation. June 2006. *San Luis Drainage Feature Re-Evaluation – Final EIS*. https://books.google.com/books?id=m_oyAQAAAMAAJ&pg=SA23-PA3&lpg=SA23-PA3&dq=San+Luis+Drainage+Feature+Re-Evaluation+EIR&source=bl&ots=ljd9p9Nqlp&sig=ACfU3U1d8Ktoxd40HqU6pAzcT9MTWEZEKA&hl=en&sa=X&ved=2ahUKEwi-j4P87sjzAhXGvp4KHeZ6DOAQ6AF6BAgaEAM#v=onepage&q=San%20Luis%20Drainage%20Feature%20Re-Evaluation%20EIR&f=false
- USBR 2007 U.S. Bureau of Reclamation. March 2007. *San Luis Drainage Feature Re-Evaluation – Record of Decision (ROD)*. https://wwd.ca.gov/wp-content/uploads/2017/03/San_Luis_Drainage_Feature_Re-evaluation_ROD.pdf
- USBR 2015 U.S. Bureau of Reclamation. October 2015. *Westlands v. United States Settlement*. <http://wwd.ca.gov/wp-content/uploads/2015/10/westlands-vs-united-states-settlement.pdf>
- USFS 2017 U.S. Forest Service (USFS). 2017. *Forests of California*. <https://usfs.maps.arcgis.com/apps/MapJournal/index.html?appid=cb64a33a4d68478198e4356a4f4f5c9c>
- WAPA 2015 Western Area Power Administration (WAPA). July 2015. *Draft EIS/EIR – San Luis Transmission Project*. <https://www.wapa.gov/about-wapa/regions/sn/environment/san-luis-transmission-project/>
- WWD 2006 Westlands Water District (WWD). April 2006. Generalized Depth of Shallow Groundwater Surface (Map). <http://wwd.ca.gov/wp-content/uploads/2015/07/April-20061.pdf>
- WWD 2010a Westlands Water District (WWD). April 2010. Generalized Depth of Shallow Groundwater Surface (Map). <http://wwd.ca.gov/wp-content/uploads/2015/07/April-20101.pdf>
- WWD 2010b Westlands Water District (WWD). October 2010. Generalized Depth of Shallow Groundwater Surface (Map). <http://wwd.ca.gov/wp-content/uploads/2015/07/October-2010.pdf>

{00081343.1}

| | |
|-----------|--|
| WWD 2013 | Westlands Water District (WWD). November 2013. <i>Water Management Handbook</i> . https://wwd.ca.gov/wp-content/uploads/2015/09/water-management-handbook-2013.pdf |
| WWD 2015 | Westlands Water District (WWD). April 2015. <i>Generalized Depth of Shallow Groundwater Surface (Map)</i> . http://wwd.ca.gov/wp-content/uploads/2015/08/gdsgs-april-2015.pdf |
| WWD 2017a | Westlands Water District (WWD). June 2017. <i>Generalized Depth to Shallow Groundwater Surface – April 2016</i> . https://wwd.ca.gov/wp-content/uploads/2018/01/sgw-gd-april-2016.pdf |
| WWD 2017b | Westlands Water District (WWD). April 2017. <i>Generalized Depth to Shallow Groundwater Surface – April 2017</i> . https://wwd.ca.gov/wp-content/uploads/2018/01/sgw-gd-april-2017.pdf |
| WWD 2019 | Westlands Water District (WWD). August 2019. Initial Study/Mitigated Negative Declaration – Agricultural Aquifer Storage and Recovery Program. https://wwd.ca.gov/wp-content/uploads/2019/08/westlands-agricultural-aquifer-storage-recovery-program.pdf |
| WWD 2021a | Westlands Water District (WWD). <i>Regulations for the Allocation and Use of Groundwater within Westside Subbasin</i> . Presentation at Advisory Committee Meeting, February 23, 2021. https://wwd.ca.gov/wp-content/uploads/2021/02/5-ac-rules-regs-presentation-2-23-21.pdf |
| WWD 2021b | Westlands Water District (WWD). April 2021. <i>Westside Subbasin Groundwater Sustainability Plan – Annual Report 2020</i> . https://wwd.ca.gov/water-management/groundwater-management-program/sustainable-groundwater-management-act/ |
| WWD 2024 | Westlands Water District (WWD). <i>Article 1: Regulations for the Groundwater Allocation Program and Use of Groundwater within the Westside Subbasin</i> . Revised May 2024. https://wwd.ca.gov/wp-content/uploads/2024/06/article-1-rr-adopted-2024-05.pdf |
| WWD 2024 | Westlands Water District (WWD). December 2024. <i>Crop Acreage Reports</i> . https://wwd.ca.gov/news-and-reports/crop-acreage-reports/ |
| WWD 2025a | Westlands Water District (WWD). <i>Annual Water Use and Supply</i> . Accessed April 10, 2025. https://wwd.ca.gov/district-water-supply/ |
| WWD 2025b | Westlands Water District (WWD). <i>By the Numbers: 2024 Crop Report</i> . Accessed April 10, 2025. https://wwd.ca.gov/wp-content/uploads/2025/01/by-the-numbers-2024-crop-report.pdf |

{00081343.1}