

4 AGRICULTURAL RESOURCES

INTRODUCTION

This chapter describes Sacramento County’s agricultural uses; identifies the extent of agricultural land on-site and within Sacramento County, including important farmland and grazing land; and determines the significance and quality of agricultural land within the project site.

ENVIRONMENTAL SETTING

Sacramento County is the state’s 23rd largest agricultural county in terms of the total value of agricultural production (U.S. Department of Agriculture 2022). The total gross valuation for all agricultural commodities produced in Sacramento County in 2022 was approximately \$602 million. This value represents an increase of approximately 5 percent from the 2021 value of \$568 million (Sacramento County Agricultural Commissioner 2023).

In 2020, wine grapes had the highest crop value (\$189 million), with over 34 reported varieties being grown on 36,000 acres. Milk production is the number two commodity at \$91 million, followed by pears (\$56 million), poultry (\$33 million), and aquaculture¹ (\$32 million) (Sacramento County Agricultural Commissioner 2023). The Agricultural Commissioner also noted substantial increases in 2022 crop values for honey and pollination values (24 percent), silage corn (55 percent), alfalfa hay (20 percent), and ryegrass (46 percent) compared to 2021 values (Sacramento County Agricultural Commissioner 2023).

SACRAMENTO COUNTY FARMLAND CONVERSION

The California Department of Conservation’s (DOC’s) Important Farmland² classifications—Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance—identify the land’s suitability for agricultural production by considering physical and chemical characteristics of the soil, such as soil temperature range, depth of the groundwater table, flooding potential, rock fragment content, and rooting depth. The classifications also consider location, growing season, and moisture available to sustain high-yield crops. (See Regulatory Setting discussion below, for detailed descriptions of important farmland classifications.)

Table AG-1 summarizes acreages of agricultural land in Sacramento County between 2010 and 2020 and shows the percentage of net change in acreage over that 10-year period. The DOC estimated that Sacramento County included 367,569 acres of

¹ Aquaculture consists of raising bass, carp, catfish, crayfish, sturgeon, and caviar.

² Appendix G to the CEQA Guidelines has been revised to label these types of farmlands as just “farmland” rather than “important farmland.”

agricultural land in 2010, of which 211,745 acres (58 percent) were classified as Important Farmland and 155,824 acres (42 percent) were classified as grazing land (DOC 2020). By 2020, the total acreage of agricultural land decreased to 348,215 acres, of which 200,426 acres (58 percent) were classified as Important Farmland and 147,789 acres (42 percent) were classified as grazing land (DOC 2020). Overall, the total acreage of Important Farmland decreased by approximately 5.3 percent over this 10-year period, while the total acreage of agricultural land decreased by 5.3 percent (Table AG-1). While the number of acres of Prime Farmland and Farmland of Statewide Importance decreased by 13.1 percent and 3.2 percent, respectively, the number of acres of Unique Farmland and Farmland of Local Importance increased by approximately 3.8 percent and 4.4 percent, respectively. The total acreage of Grazing Land decreased at a similar rate (5.2 percent) during this period.

Table AG-1. Summary of Agricultural Land Conversion in Sacramento County

Important Farmland Category	Acres in 2010	Acres in 2020	Net Change (%) (2010–2020)
Prime Farmland	97,477	84,684	-13.1
Farmland of Statewide Importance	45,263	43,825	-3.2
Unique Farmland	15,076	15,642	3.8
Farmland of Local Importance	53,929	56,275	4.4
Important Farmland Subtotal	211,745	200,426	-5.3
Grazing Land	155,824	147,789	-5.2
Agricultural Land Total	367,569	348,215	-5.3

Source: DOC 2020

PROJECT SITE AGRICULTURAL USES

The project site has historically and is currently used year-round for livestock grazing. According to the Sacramento County Important Farmland Map, published by the California Division of Land Resource Protection (DOC 2020), approximately 2,577 acres of the project site is designated as grazing land and 1,394 acres of the solar development area is designated as grazing land. The remainder of the solar development area is designated as Other Land (approximately 14 acres) and Urban and Built-Up Land (approximately three acres) (DOC 2020). Plate PD-3 in Chapter 2, “Project Description” shows the location of Important Farmland within and adjacent to the project site.

WILLIAMSON ACT

Under the California Land Conservation Act of 1965, also known as the Williamson Act, local governments can enter into contracts with private property owners to protect land (within agricultural preserves) for agricultural and open space purposes.

Approximately 1,334 acres of the solar development area is subject to Williamson Act contracts. The Williamson Act contracts for these parcels have been amended by Sacramento County to allow for solar PV facilities and battery energy storage in conjunction with agricultural activities.

AGRICULTURAL ZONING

The project site is currently zoned AG-80 by Sacramento County. The AG-80 zoning designation is intended to eliminate encroachment of incompatible land uses with the long-term agricultural use; discourage the premature and unnecessary conversion of agricultural land to urban uses; assure the preservation and sustainability of agricultural lands that have a definite value as open space and for the production of agricultural products, so as to preserve an important physical, social, aesthetic, and economic asset of the residents of the County; and encourage the retention of sufficiently large agricultural lots to assure maintenance of viable agricultural units (Sacramento County 2023).

Permitted uses within the AG-80 zoning designation include raising and harvesting crops, commercial bee keeping, primary processing of agricultural products, stables and corrals, roadside crop sales, single-family dwelling units, farm worker housing, parks, wildlife preserves, and gas and oil wells (Sacramento County 2023).³ Uses permitted with approval of a Use Permit include agricultural equipment repair, maintenance, and manufacturing; food processing industries; large wineries; places of worship; private schools; campgrounds; hunting clubs; major utilities; solar energy facilities; wind turbine facilities; and wireless communication towers (Sacramento County 2023).⁴

REGULATORY SETTING

FEDERAL

There are no federal plans, policies, regulations, or laws related to agriculture and forestry resources that apply to the proposed project.

³ See Table 3.1, “Allowed Uses,” in the Sacramento County Zoning Code (available: <https://planning.saccounty.gov/LandUseRegulationDocuments/Pages/SacramentoCountyZoningCode.aspx>).

⁴ Use Permits require review and approval in accordance with the Sacramento County Zoning Code and uses are subject to all applicable regulations, including use standards provided in Chapter 3, “Use Regulations,” and Chapter 5, “Development Standards,” of the Sacramento County Zoning Code. Each Use Permit application is evaluated as to its probable effects on adjacent properties and surrounding areas. Depending on the proposed use, approval of the Use Permit is provided by the Planning Director, Zoning Administrator, Planning Commission, or County Board of Supervisors.

STATE

CALIFORNIA IMPORTANT FARMLAND INVENTORY SYSTEM AND FARMLAND MITIGATION AND MONITORING PROGRAM

The Farmland Mapping and Monitoring Program (FMMP) was established by the State of California in 1982 to continue the important farmland mapping efforts begun in 1975 by the U.S. Soil Conservation Service (now called the Natural Resources Conservation Service, under the U.S. Department of Agriculture). The intent was to produce agricultural resource maps, based on soil quality and land use across the nation. The DOC sponsors the FMMP and also is responsible for establishing agricultural easements, in accordance with California Public Resources Code (PRC) Sections 10250–10255.

The DOC FMMP maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. The following list provides a comprehensive description of all the categories mapped by the DOC (DOC 2024):

- **Prime Farmland**—Land that has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields.
- **Farmland of Statewide Importance**—Land similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture.
- **Unique Farmland**—Land of lesser quality soils used for the production of the state’s leading agricultural cash crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California.
- **Farmland of Local Importance**—Land that is of importance to the local agricultural economy, as defined by each county’s local advisory committee and adopted by its board of supervisors. The Sacramento County Board of Supervisors has defined Farmland of Local Importance as lands which do not qualify as Prime, Statewide, or Unique designation but are currently irrigated crops or pasture or non-irrigated crops; lands that would be Prime or Statewide designation and have been improved for irrigation but are now idle; and lands which currently support confined livestock, poultry operations, and aquaculture (DOC 2018).
- **Grazing Land**—Land with existing vegetation that is suitable for grazing.
- **Urban and Built-Up Lands**—Land that is used for residential, industrial, commercial, institutional, and public utility structures and for other developed purposes.
- **Other Lands**—Land that does not meet the criteria of any of the previously described categories and generally includes low-density rural developments, vegetative and riparian areas not suitable for livestock grazing, confined-animal

agriculture facilities, strip mines, borrow pits, and vacant and nonagricultural land surrounded on all sides by urban development.

Important farmland is classified by the DOC as prime farmland, farmland of statewide importance, unique farmland, and farmland of local importance. Under California Environmental Quality Act (CEQA), the designations for prime farmland, farmland of statewide importance, and unique farmland are defined as “agricultural land” or “farmland” (PRC Sections 21060.1 and 21095, and CEQA Guidelines Appendix G).

LOCAL

SACRAMENTO COUNTY GENERAL PLAN

The following policies in the Sacramento County General Plan (2020) related to agricultural resources that may be applicable to the proposed project:

AGRICULTURAL ELEMENT

Policy AG-5. *Projects resulting in the conversion of more than fifty (50) acres of farmland shall be mitigated within Sacramento County, except as specified in the paragraph below, based on a 1:1 ratio, for the loss of the following farmland categories through the specific planning process or individual project entitlement requests to provide in-kind or similar resource value protection (such as easements for agricultural purposes):*

- prime, statewide importance, unique, local importance, and grazing farmlands located outside the Urban Services Boundary (USB);⁵
- prime, statewide importance, unique, and local importance farmlands located inside the USB.

The Board of Supervisors retains the authority to override impacts to unique, local, and grazing farmlands, but not with respect to prime and statewide farmlands. However, if that land is also required to provide mitigation pursuant to a Sacramento County endorsed or approved Habitat Conservation Plan (HCP), then the Board of Supervisors may consider the mitigation land provided in accordance with the HCP as meeting the requirements of this section including land outside of Sacramento County.

Note: This policy is not tied to any maps contained in the Agricultural Element. Instead, the most current Important Farmland Map from the DOC should be used to calculate mitigation.

⁵ The Urban Services Boundary (USB) and Urban Policy Area (UPA) are growth management tools of the County’s General Plan. The USB is the ultimate growth boundary for the unincorporated area and the UPA defines the area within the USB expected to receive urban services in the near term.

PUBLIC FACILITIES ELEMENT

Policy PF-78: Large multi-megawatt solar and other renewable energy facilities should be sited at locations that will minimize impacts. The following guidelines should be considered, though it is recognized that each project is different and must be analyzed individually, and that other factors may affect the suitability of a site. Locational criteria for wind turbines should be determined on a case-by-case basis and referred to the Sacramento County Airport System and the FAA for review and comment.

- Desirable sites are those which will minimize impacts to county resources and will feed into the electrical grid efficiently, including:
 - Lands with existing appropriate land use designations, e.g., industrial.
 - Brownfield or other disturbed properties (e.g., former mining areas, mine tailings) or land that has been developed previously and has lost its natural values as open space, habitat or agricultural land.
 - Sites close to existing facilities necessary for connection to the electrical grid to minimize the need for additional facilities and their impacts, and to improve system efficiency.
- Other sites may be used for siting renewable energy facilities after consideration of important natural and historic values of the land, including:
 - Farmlands. Site on farmlands of the lowest quality, e.g., land classified by the DOC as “other land” or “grazing land”, then consider farmlands of local, unique or statewide importance. Avoid high-quality farmlands, especially land classified by the DOC as prime and lands under active Williamson Act contracts.
 - Habitat and Other Open Space Lands. Site on lands with the lowest habitat and open space values, and consider how a site will affect conservation planning, e.g., the Conservation Strategy in the South Sacramento HCP. Avoid areas containing vernal pool complexes and associated uplands.
 - Scenic Values. Site in areas of lowest scenic values and avoid visually prominent locations e.g., ridges, designated scenic corridors and designated historic sites.
 - Cultural Resources. Site in areas that are known to have limited potential for containing cultural resources. Otherwise, avoid sites with known cultural resources.

Policy PF-79. New solar and other renewable energy facilities should be designed and developed so as to minimize impacts to sensitive biological resources such as oak woodlands and vernal pools, cultural resources (including designated historic landscapes), or farmlands as defined by the California DOC. Nearby farm operations shall not be negatively affected by renewable energy facilities, per the policies of the Right-to-Farm Ordinance and the Agricultural Element.

IMPACTS AND ANALYSIS

SIGNIFICANCE CRITERIA

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

- convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to nonagricultural use;
- conflict with existing zoning for agricultural use or a Williamson Act contract;
- conflict with existing zoning for, or cause rezoning of, forestland (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526), or timberland zoned timberland production (as defined by Government Code Section 51104[g]);
- result in the loss of forestland or conversion of forestland to non-forest use; or
- involve other changes in the existing environment that, because of their location or nature, could result in conversion of farmland to nonagricultural use or conversion of forest land to non-forest use.

In addition to the CEQA Guidelines significance criteria for farmland loss, County General Plan Policy AG-5 defines substantial farmland loss as 50 acres. The CEQA Guidelines indicate that prime, statewide importance, and unique farmland loss may be a significant impact, but the County General Plan further includes farmland of local importance and grazing land; though in the case of grazing land, the threshold specifically applies only to such lands which occur outside of the USB.

ISSUES NOT DISCUSSED FURTHER

Conflict with Existing Zoning for Agricultural Use— The project site is currently zoned by Sacramento County as AG-80. The AG-80 zoning designation anticipates agricultural use of this land and is intended to promote the long-term agricultural use and discourage the premature and unnecessary conversion of agricultural land to urban use. As discussed above, the proposed project is categorized as Commercial II Solar Facilities by the Sacramento County Zoning Code and approval of a Use Permit is required for this use under the AG-80 zoning designation. Implementation of the proposed project would

require the project applicant to submit a Use Permit application for review and approval by the Sacramento County Board of Supervisors. As a condition of the Use Permit, the project applicant would be required to meet all use regulations for Commercial II Solar Facilities provided in Section 3.6.6.C in Chapter 3 of the Sacramento County Zoning Code. The Sacramento County Board of Supervisors would evaluate the proposed project's effects on adjacent properties and potential conflicts with the AG-80 zoning designation to ensure compatibility of the proposed project with surrounding uses and zoning (Sacramento County 2023). With approval of the proposed project, issuance of a Use Permit, and compliance with permit conditions, the proposed project would not conflict with zoning for agricultural use. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Conflict with a Williamson Act Contract— Approximately 1,334 acres of the solar development area is subject to Williamson Act contracts. The Williamson Act contracts allow for gas, electric, water, and communication utility facilities, as well as solar PV facilities and battery energy storage in conjunction with agricultural activities. Because the proposed project is an allowable use, there would be no conflicts with existing Williamson Act contracts. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Conflict with Existing Zoning for, or Cause Rezoning of, Forest Land, Timberland, or Timberland Zoned Timberland Production— The project site is zoned AG-80 and not zoned as forestland, timberland, or a timberland production zone. Thus, the proposed project would not conflict with existing zoning for, or cause rezoning of, forestry resources. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Result in the Loss of Forest Land or Conversion of Forest Land to Non-Forest Use— The project site does not contain timberland as defined by PRC Section 4526 or contain 10 percent native tree cover that would be classified as forestland under PRC Section 12220(g).⁶ Approximately 54.61 acres of contiguous oak woodlands and forest are within the solar development area, which is less than 10 percent of the solar development area. Thus, the proposed project would not result in conversion of forest land to non-forest use. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Indirectly Result in the Conversion of Agricultural Land to Non-Agricultural Use— There are no actively farmed agricultural lands in the vicinity of the project site, only grazing lands. The proposed project would not indirectly result in other changes in the physical environment that could result in the conversion of agricultural land, including agricultural land designated as Important Farmland, to non-agricultural uses. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

⁶ Per PRC Section 12220(g), "forest land" is land that 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, aesthetic, fish and wildlife biodiversity, water quality, recreation, and other public benefits.

IMPACT AG-1: CONVERSION OF AGRICULTURAL LAND TO NON-AGRICULTURAL USE

At the proposed project site, approximately 1,412 acres of existing livestock (sheep and cattle) grazing land would be used for new solar generating facilities. Most of the project site would consist of pole-mounted solar panel arrays. In addition, battery storage containers, an electrical substation, a switchyard, internal roadways, fencing and gates, and other ancillary facilities would be developed.

According to the Sacramento County Important Farmland Map, published by the California Division of Land Resource Protection (DOC 2020), approximately 1,394 acres of the solar development area is designated as grazing land. The remainder of the project site is designated as Other Land (approximately 14 acres) and Urban and Built-Up Land (approximately three acres) (DOC 2020).

Appendix G of the CEQA Guidelines indicates that conversion of prime farmland, farmland of statewide importance, or unique farmland to non-agricultural use would result in a significant environmental effect for the conversion of agricultural land. No portion of the project site is designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland; therefore, no impact would occur under the CEQA thresholds.

However, County General Plan Policy AG-5 defines the loss of 50 acres or more of grazing land outside of the USB as a substantial conversion of farmland. Construction of the proposed project would require temporary ground disturbance during installation of project facilities. The electrical substation, battery storage foundations, switchyard, entrances, and interior access roads would result in new impervious surfaces associated with the project facilities. During project operations, the remainder of the project site would be maintained as dryland pasture supporting a combination of grassland species and non-invasive forbs. In addition, the project applicant has indicated that the project site would include concurrent grazing operations pursuant to the project's draft *Agricultural Management Plan* (Dudek 2025), which is included in Appendix AG-1.

At the end of the project's estimated operational life of 35 years, decommissioning would occur in accordance with Sacramento County's decommissioning requirements. The project's *Decommissioning and Site Restoration Plan* (Dudek 2023) is included in Appendix PD-1. Restoration activities would be required to return the project site to agriculture use (i.e., livestock grazing), and would include the following:

- Returning the land to agricultural use would entail increasing the nutrient content to pre-construction levels and aerating the soils through regular tilling.
- Reclamation would restore vegetative cover and hydrologic function after closure of the facility. The process would involve replacement of topsoil, brush, rocks, and natural debris over disturbed areas so that the site will support agriculture use (i.e., livestock grazing) or similar useful purpose.

- If soils are determined to be compacted at levels that would affect successful restoration, decompaction would occur. The method of decompaction would depend on how compacted the soil has become over the life of the project.
- A combination of seeding, planting of nursery stock, transplanting of local vegetation within the proposed disturbance areas, and staging of decommissioning activities enabling direct transplanting, would be considered.

The success of the decommissioning restoration efforts would be based on the development of the target vegetation communities relative to undisturbed reference sites.⁷ To monitor success, visual inspections would be conducted to document germination, growth, and survival of seeded species. Data collected would include species composition and cover, general size and vigor of the plants, observed soil erosion, evidence of wildlife use, and any other information that would be useful in evaluating success. The monitoring program would also include photographic documentation at permanent photo locations. As part of this monitoring program, annual Decommissioning Restoration Monitoring Reports describing the above information shall be prepared by the project applicant for the first five years following the decommissioning of the project. The annual reports shall be submitted to Sacramento County Planning and Environmental Review. To ensure the availability of funds to cover decommissioning and restoration obligations, the project applicant would be required to post a performance bond, letter of credit, or other form of surety (Dudek 2023).

While the applicant proposes to maintain the site in grazing during operation of the facility, should grazing be discontinued or the site is otherwise converted to a non-agricultural use, the impacts would be **potentially significant** based on Sacramento County General Plan Policy AG-5.

MITIGATION MEASURES

AG-1. Implement the Agricultural Management Plan.

Prior to issuance of a building permit, the project applicant shall submit the draft Agricultural Management Plan to Sacramento County Planning and Environmental Review for review and approval. The Agricultural Management Plan shall be implemented throughout the operational life of the project and specify the following conditions to ensure ongoing use of the project site for grazing.

SITE PREPARATION/SOIL TREATMENT

After completion of construction activities, all construction materials, trash, and debris shall be removed from areas of the project site that are to be seeded. Any eroded areas shall be repaired uniformly without leaving pits, holes, or low areas.

Soil preparation (decompaction, tillage, seeding) activities shall be conducted when soil conditions are dry or only slightly moist. Soil preparation shall not be

⁷ The reference sites would represent intact, native vegetative communities with similar species composition and conditions that that occurred prior to impacts.

undertaken if soils are so moist that traffic or tillage would lead to mold or smearing. Because it is not possible to predict the exact construction schedule, two different approaches may be used for soil preparation:

- **Dry Season Construction:** If construction activities are completed in fall, soil preparation activities shall be implemented to provide the best opportunity for seeding to be completed by October 15. Soil preparation activities may be conducted later in fall provided dry or only slightly moist soil conditions persist.
- **Wet Season Construction:** If construction activities are completed in winter when soil conditions are too wet to allow for effective soil manipulation, soil preparation activities would be postponed until the following late summer or fall, as described above under Dry Season Construction. Under this scenario, it may be necessary to apply an herbicide treatment in late spring/early summer to minimize the spread of invasive species.

Prior to seeding, any areas intended for revegetation that were compacted by construction activities shall be decompacted to not more than 12 inches depth on not less than 18-inch centers, such that clods remain and soil is not pulverized. Soil shall be left in a roughened condition if construction is completed in spring or early summer and several months remain until seeding. Before seeding, a disk and/or ring roller shall be used to reduce the soil surface to a suitable planting medium with a firm but not compacted surface and clods reduced to less than 1 inch. If organic soil amendments are used, compost shall be obtained from a producer fully permitted as specified under the California Integrated Waste Management Board, Local Enforcement Agencies, and any other State and Local Agencies that regulate Solid Waste Facilities.

SEEDING PLAN

Final site-specific seeding plans shall be developed based on assessment of the following factors: (1) soil conditions; (2) appropriate grassland species; (3) pollinator habitat; and (4) dietary preferences of the animals identified to graze on-site. These seeding plans shall be designed to be self-perpetuating; that is, the vegetation is intended to re-seed naturally.

The site shall be seeded using seed drills or broadcast seeding followed by light raking. Hydroseeding and hydromulching may also be used depending on the timing and site-specific conditions. Seeding is not recommended in June, July, or August due to high temperatures in the region and subsequent low germination success. As such, seeding is recommended and optimal from October through January or February in this region to utilize natural precipitation for irrigation and increase overall germination survivorship. The vegetation is intended to reestablish naturally following construction, additional seeding may; be required if a groundcover fails to be established and meet the requirements of the Agricultural Management Plan.

GRAZING AND POLLINATOR HABITAT PLAN

The project applicant shall enter into agreements with a grazing entity and/or habitat management contractors to manage the forage resources. Grazing and forage utilization shall be managed so that erosion and nutrient losses are minimized and so that overgrazing does not occur. These guidelines are designed to provide for sustainable forage production and to protect soil resources and water quality.

Grazing would likely start between March 1 and April 30 with the timing dependent on weather and foraging conditions. During the grazing period, grass shall be maintained at a height of approximately six inches in accordance with local fire codes. The grazing entity and/or habitat manager shall also complete regular inspections for invasive weed populations to maintain a native grassland within the fenced solar array.

As required by Mitigation Measure WF-1 (in Chapter 13, "Wildfire"), after the grazing period, the applicant shall keep grasses and weeds on the undeveloped upland portion of the project site to a height of six inches or less, and throughout the dry season months, between May and November, to manage grass height and fuel load on-site. To control the weed height, mowing may be required.

VEGETATION AND POLLINATOR HABITAT MONITORING PLAN

Annual Vegetation and Grazing Monitoring Reports shall be prepared by the project applicant for the first five years of the project's operation and then every three years afterwards for the life of the project. The annual reports and subsequent reports shall be submitted to Sacramento County Planning and Environmental Review. These reports shall document the estimated species coverage and diversity, species health and overall vigor, the establishment of volunteer native species, topographical/soils conditions, problem weed species, whether there is significant drought stress, and remedial measures recommended to ensure the habitat function and value within the solar facility is consistent with the habitat function and value outside of the solar facility. These reports shall include at a minimum:

- The name, title, and company of all persons involved in restoration monitoring and report preparation.
- Maps or aerials showing restoration areas, transect locations, and photo documentation locations.
- An explanation of the methods used to perform the work, including the number of acres treated for removal of non-native plants, any revegetation or weed control efforts undertaken.
- An assessment of the achievement of the relevant performance for vegetation success and how the vegetation management compares to non-managed areas located outside of the fenced solar facility.

GRAZING MONITORING PLAN

Annual Vegetation and Grazing Monitoring Reports shall be prepared by the project applicant for the first five years of the project's operation and then every three years afterwards for the life of the project regarding the level of grazing use at the project site. The annual reports and subsequent reports shall be submitted to Sacramento County Planning and Environmental Review, the County's Assessor's Office, and Sacramento County Agricultural Commissioner. These reports shall include at a minimum:

- The name, title, and company of all persons involved in grazing contracts and report preparation.
- Documentation of grazing timing and locations, equipment, and water use.
- Maps or aerials showing clipping and photo documentation locations.
- An assessment of native grassland ground cover that is utilized by biological resources native to the project area.

SIGNIFICANCE AFTER MITIGATION

The implementation of Mitigation Measure AG-1 would reduce project-related impacts related to the conversion of agricultural resources to non-agricultural use to a **less-than-significant** level because implementation of the *Agricultural Management Plan* (Included as Appendix AG-1, Dudek 2025) with conditions directed by Mitigation Measure AG-1 would require continued agricultural use (i.e., grazing) of the project site through the operational life of the project and maintain the site's soil characteristics. As stated above under Regulatory Setting, the County General Plan Policy AG-5 states that projects resulting in the loss of more than 50 acres of Prime, Statewide Importance, Unique, Local Importance, and Grazing farmlands located outside the USB would result in a substantial loss of farmland and would require mitigation. However, with the implementation of the Agricultural Management Plan outlined in Mitigation Measure AG-1, the conversion of farmland would not occur because, except roads, utility equipment, and battery storage areas, the project applicant would be required to continuously use the project site for agricultural uses, such as grazing. With the implementation of Mitigation Measure AG-1, the renewable energy facilities would be co-located with grazing on-site and thus, agricultural activities would continue on-site concurrently with the proposed project operations.

As discussed above, the project site predominantly contains land characterized as grazing land by the DOC (1,394 acres). According to County General Plan Policy PF-78, large multi-megawatt solar and other renewable energy facilities should be sited at locations that would minimize impacts. Policy PF-78 indicates that impacts to County resources can be minimized by locating solar facilities close to existing facilities necessary for connection to the electrical grid. Policy PF-78 suggests that solar facilities should be located on farmlands of the lowest quality, e.g., land classified by the DOC as other land or grazing land and to avoid high-quality farmlands that are classified as Prime Farmland or active Williamson Act contracted land. The proposed project site does not contain any Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.

If the proposed project were approved, the DOC's FMMP mapping would result in a change to the entire site from farmland to urban and built-up land. However, the FMMP program is primarily based on aerial data review and does not yet have a feature within the program to indicate two compatible uses such as agricultural uses within a solar energy facility. With the implementation of Mitigation Measure AG-1, the applicant would be required to continue supporting agricultural use on-site throughout the life of the project. Additionally, after decommissioning is complete, the site would be required to be restored to agricultural land in accordance with Sacramento County's decommissioning requirements.