4.2 Agriculture and Forestry Resources

4.2.1 Introduction

This section describes the setting and potential impacts on agriculture resources that could occur from the Proposed Project, reasonably foreseeable distribution components, and alternatives. Impacts to agriculture resources under CEQA generally include conversion of agricultural land to non-agricultural uses, conflicts with zoning for agricultural use or Williamson Act contracts, or other changes to the physical environment resulting in a conversion of farmland to non-agricultural use. Because there are no forest lands or timberland in the vicinity of the Proposed Project, reasonably foreseeable distribution components, or alternatives, potential impacts to forestry resources were dismissed from detailed consideration.

4.2.2 Regulatory Setting

Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies related to agriculture or forestry resources are applicable to the Proposed Project, reasonably foreseeable distribution components, or alternatives.

State Laws, Regulations, and Policies

Farmland Mapping and Monitoring Program

The California Department of Conservation (CDOC) established the Farmland Mapping and Monitoring Program (FMMP) in 1982, as a non-regulatory program to provide a consistent and impartial analysis of agricultural land use and land use changes throughout California. FMMP now maps agricultural and urban land use for nearly 98 percent of the state's privately held land. FMMP rates and classifies agricultural land according to soil quality, irrigation status, and other criteria. Important Farmland categories are as follows (CDOC 2020a):

Prime Farmland: Farmland 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. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

Farmland of Statewide Importance: Farmland similar to Prime Farmland, but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

Unique Farmland: Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. Land must have been cropped at some time during the 4 years prior to the mapping date.

Farmland of Local Importance: Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

Other FMMP categories include Grazing Land, Urban and Built-Up Land, Other Land, and Water.

California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) is designed to preserve agricultural and open space land. It establishes a program of private landowner contracts that voluntarily restrict land to agricultural and open space uses. The program is a two-step process involving the establishment of an agricultural preserve by the local legislative body and then approval of a land conservation contract. In return, Williamson Act parcels receive a lower property tax rate consistent with their actual use instead of their market value. Lands under contract may also support uses that are "compatible with the agricultural, recreational, or open-space use of [the] land" subject to the contract (California Government Code Section 51201[e]). Under Government Code Section 51238, electric facilities are a compatible use.

Government Code Section 51290 states that "(a) it is the policy of the state to avoid, whenever practicable, the location of any federal, state, or local public improvements and any improvements of public utilities, and the acquisition of land therefor, in agricultural preserves," and "(b) it is further the policy of the state that whenever it is necessary to locate such an improvement within an agricultural preserve, the improvement shall, whenever practicable, be located upon land other than land under a contract pursuant to this chapter." However, Section 51293 goes on to list as exempt from the requirements preventing placement of public improvements within Williamson Act contract lands: "the location or construction of any public utility improvement which has been approved by the Public Utilities Commission."

California Farmland Conservancy Program

The California Farmland Conservancy Program is established under Public Resources Code (PRC) Section 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements. In addition to funding provided for agricultural easement acquisition, California Farmland Conservancy Program grant funds are available for projects that develop policy or planning oriented to agricultural land protection, and for improvements to land already under an agricultural conservation easement (e.g., erosion control, riparian area improvements). The program is authorized to accept donations from private entities if CDOC is the designated beneficiary of the donation and it uses the funds for purposes of the program in a county specified by the donor (PRC Section 10231.5).

4.2.3 Environmental Setting

Regional Setting

California is the leading agriculture-producing state, with a total market value of approximately $45.1 billion in agricultural products sold in 2017 (U.S. Department of Agriculture [USDA] National Agricultural Statistics Service [NASS] 2019). The California Department of Food and Agriculture (CDFA) reported $50.3 billion in sales in 2017, a 6.7 percent increase over 2016.

California remained the number one state in cash farm receipts, comprising 13.4 percent of the U.S. total (CDFA 2018).

The Proposed Project, reasonably foreseeable distribution components, and alternatives would be located in San Luis Obispo County, which is the 15th-ranked county in California in terms of overall agricultural production (CDFA 2018). Total crop value in San Luis Obispo County was $924.7 million in 2017, which was a 0.6 percent decrease from the $929.9 million in sales recorded in 2016 (CDFA 2018). The top two commodities in the County in 2017 were wine grapes and strawberries, accounting for 50 percent of the total combined value of the County's agricultural industry. Wine grape sales totaled $268 million (~29 percent) and fresh strawberries were valued at $200 million (~22 percent). Other 2017 top 10 commodities in San Luis Obispo County included: vegetables ($105.9 million), cattle and calves ($43.2 million), broccoli ($43.0 million), nursery plants ($33.1 million), processing strawberries ($28.2 million), avocados ($27.3 million), cut flowers ($27.2 million), and fruits and nuts ($26.2 million) (CDFA 2018). San Luis Obispo County has a total of 397,187 acres of Important Farmland, including 41,188 acres of Prime Farmland (CDOC 2016a).

Existing Agricultural Uses and Zoning

The proposed Estrella Substation would be located on one of five contiguous parcels comprising Steinbeck Vineyards & Winery. The proposed substation would be located on an approximately 15-acre portion of an existing 98-acre parcel (APN 015-053-011) that currently supports vineyards and is surrounded on all sides by vineyards and other agricultural uses (e.g., wineries, orchards, dry farming, grazing) (NEET West and PG&E 2017). The proposed substation site and all surrounding areas are within the County's Agriculture land use designation (refer to Section 4.11, "Land Use and Planning" for additional discussion of land use designations and zoning).

Portions of the Proposed Project's new 70 kV power line segment would pass through areas of existing agricultural uses, including vineyards, orchards, dry farming, and grazing lands, as well as agricultural accessory uses within rural residential areas (NEET West and PG&E 2017). Other portions would be constructed within existing and new utility corridors. Identified temporary staging areas and pull sites located along the new 70 kV power line segment are also comprised of vineyards, row crops, and dry farming (NEET West and PG&E 2017). The entire length of the new 70 kV power line segment in the unincorporated county is within the County's Agriculture land use designation (though a portion of the power line extends along the boundary between an Agriculture and Residential Rural designation). Within the City of Paso Robles, a portion of the new power line segment extends adjacent to a Residential Agriculture (RA) zoning district in the eastern portion of the city. The majority of the Proposed Project's 70 kV power line reconductoring segment would extend through urbanized areas in the City of Paso Robles where there are minimal existing agricultural uses, although some larger parcels support limited grazing and/or equestrian uses and dry farming (particularly in an area approximately 0.25 mile south of Creston Road) (NEET West and PG&E 2017).

The reasonably foreseeable distribution components would pass through largely agricultural areas, as well as along road rights-of-way. In particular, the southern new distribution line segment would be installed along an existing dirt road through agricultural fields north of the proposed Estrella Substation site. A portion of the northern new distribution line segment also

would pass through existing agricultural fields (see Figure 2-10 in Chapter 2, *Project Description*). These components would largely occur in the County's Agriculture designation.

Of the alternatives under consideration that are located entirely or partially outside of the City of Paso Robles limits (Alternatives SS-1, PLR-1A, PLR-1C, SE-1A, and SE-PLR-2), these alternatives are primarily within the County's Agriculture or Residential Rural land use designations. In particular, both the Bonel Ranch Substation Site (Alternative SS-1) and Templeton Substation Expansion Site (Alternative SE-1A) are designated for Agriculture and currently under agricultural production, the former of which is used to grow alfalfa. The majority of the lengths of the new and reconductored power line segments under Alternatives PLR-1A and PLR-1C would pass through active agricultural lands designated for Agriculture, as shown on Figure 4.11-1 in Section 4.11, "Land Use and Planning." Portions of the Alternative SE-PLR-2 route would pass through agricultural lands, as well as lands designated Residential Rural by the County. Alternative PLR-3 (both options) would not be located on any lands currently under agricultural production or zoned/designated for agriculture use. Of the example FTM sites under Alternative BS-2, only FTM Site 6 would be located on lands currently under agricultural production and designated for agriculture (the example FTM Site 6 would be in the same location as Alternative SE-1A).

Important Farmland

As noted above, San Luis Obispo County as a whole had 397,187 acres of Important Farmland, including 41,188 acres of Prime Farmland, as of 2016. Table 4.2-1 shows the breakdown of Important Farmland on the proposed Estrella Substation site.

Table 4.2-1. FMMP Acreage at the Estrella Substation Site

FMMP Category	Area (acres)	Percentage of Substation Site
Farmland of Statewide Importance	2.66	17%
Unique Farmland	11.70	77%
Farmland of Local Potential	0.70	5%
Grazing Land	0.11	<1%
Total	**15.17**	**100%**

Source: CDOC 2016b

As shown in Table 4.2-1, approximately 17 percent (2.66 acres) of the site is Farmland of Statewide Importance, while 77 percent (11.70 acres) is Unique Farmland and a small percentage is Farmland of Local Importance and Grazing Land. FMMP mapping at the proposed Estrella Substation site and throughout the vicinity of the Proposed Project, reasonably foreseeable distribution components, and alternatives is shown in Figure 4.2-1.

Some portion of the Proposed Project's 70 kV power line route extends through every mapped category of Important Farmland. In particular, the portion of the new power line segment along Union Road and south of SR 46 passes primarily through Unique Farmland and Farmland of Local Potential, with small areas mapped as Farmland of Statewide Importance (see Figure 4.2-1).

Additionally, the northwestern portion of the new power line segment passes through areas of Farmland of Local Potential, Unique Farmland, Farmland of Statewide Importance, and a small area of Prime Farmland. The Proposed Project's reconductoring segment extends predominantly through Grazing Land and Urban and Built-up Land. The southern reasonably foreseeable new distribution line would extend through Unique Farmland, while the remainder of the reasonably foreseeable distribution components would not be located on mapped Important Farmland.

Both Alternative SS-1 and SE-1A sites would be on lands mapped as Farmland of Local Importance as well as Farmland of Local Potential. Similar to the proposed 70 kV power line segment, Alternatives PLR-1A and PLR-1C would extend through every mapped category of Important Farmland. Alternative SE-PLR-2 would extend through every mapped category except Prime Farmland and Unique Farmland. Alternative PLR-3 (both options) would occur primarily on Farmland of Local Potential, Grazing Land, and Urban and Built-up Land. Example FTM Sites 1 to 4 and 6 to 8 under Alternative BS-2 would be located on lands mapped as Farmland of Local Potential, Urban and Built-up Land, and Other Land, while the example FTM Site 5 would be located on Farmland of Local Importance.

Williamson Act Contract Lands

The entire 98-acre Steinbeck Vineyards & Winery parcel, on which the proposed Estrella Substation would be located, is currently subject to a Williamson Act contract (NEET West and PG&E 2017; CDOC 2016c). This contract is active and no non-renewal or cancellation process has been initiated. Parcels immediately adjacent to the west and north of the Steinbeck parcel are also under Williamson Act contracts, as well as additional non-contiguous parcels located less than 1 mile to the west, north, and south of the Steinbeck parcel. Figure 4.2-2 shows lands under Williamson Act contracts in the Proposed Project, reasonably foreseeable distribution components, and alternatives vicinity. Approximately 1.5 miles of the Proposed Project 70 kV power line route would extend through parcels currently subject to a Williamson Act contract. These lands are primarily located along the easternmost portion of the 70 kV Power Line route near the proposed substation. No Williamson Act contracts along the Proposed Project 70 kV power line route are currently in the non-renewal process.

As shown on Figure 4.2-2, the land through which the southern reasonably foreseeable new distribution line would be installed is under a Williamson Act contract. With respect to the alternatives, approximately 1.1 miles of the length of the Alternative PLR-1A new power line route would extend through parcels currently subject to a Williamson Act Contract. Additional Williamson Act lands are located along the Alternative PLR-1A/PLR-1C reconductoring segments. No Williamson Act lands are located on or in close proximity to Alternatives SS-1, PLR-3, SE-1A, SE-PLR-2, or BS-2 (example FTM sites).

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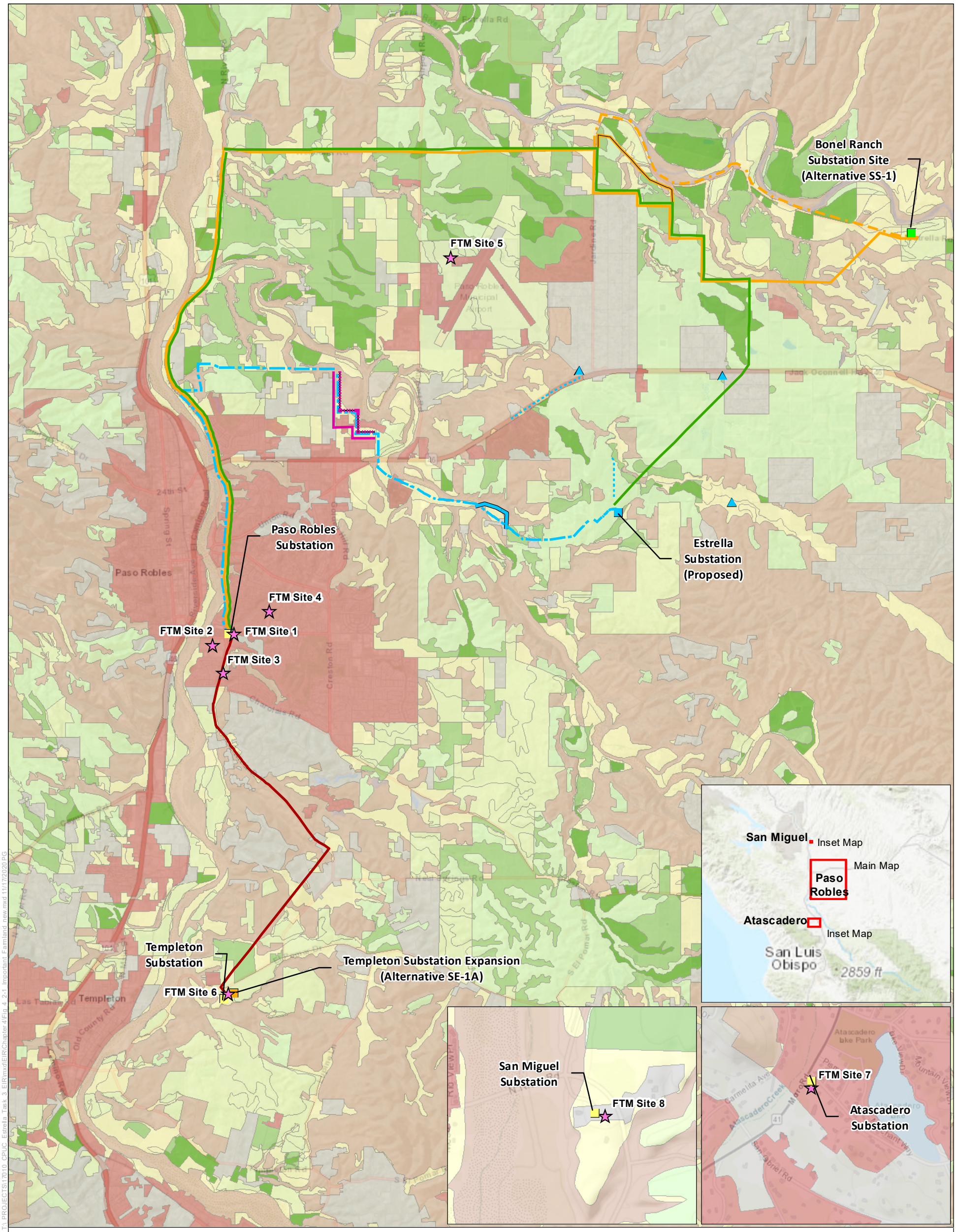

Proposed Project

- Estrella Substation
- 70kV Route
- 70 kV Minor Route Variation 1

Reasonably Forseeable Distribution Components

- New Distribution Line Segments
- Additional 21/12 kV Pad-Mounted Transformer

Existing Infrastructure

- Existing Substations

Project Alternatives

- Front-of-the-Meter (FTM) Battery Storage Sites (Alternative BS-2)
- Alternative SS-1: Bonel Ranch Substation Site
- Alternative SE-1A: Templeton Substation Expansion - 230/70 kV Substation
- Alternative PLR-1A: Estrella Route to Estrella Substation
- Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1
- Alternative PLR-1C: Minor Route Variation 1
- Alternative PLR-1C: Minor Route Variation 2
- Alternative PLR-3A: Strategic Undergrounding, Option 1
- Alternative PLR-3B: Strategic Undergrounding, Option 2
- Alternative SE-PLR-2: Templeton-Paso South River Road Route

Farmland Mapping and Monitoring Program

- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Farmland of Local Importance
- Farmland of Local Potential
- Grazing Land
- Urban and Built-up Land
- Other Land

N

0 1 Miles

Horizon WATER and ENVIRONMENT

Figure 4.2-1
Important Farmland

Source: ESRI 2018, PG&E 2019, SCWA 2017, CDOC FMMP 2016

Note: The route variations shown are offset and simplified in order to display the alignments of the alternative routes that may overlap in places

Estrella Substation and
Paso Robles Area Reinforcement Project

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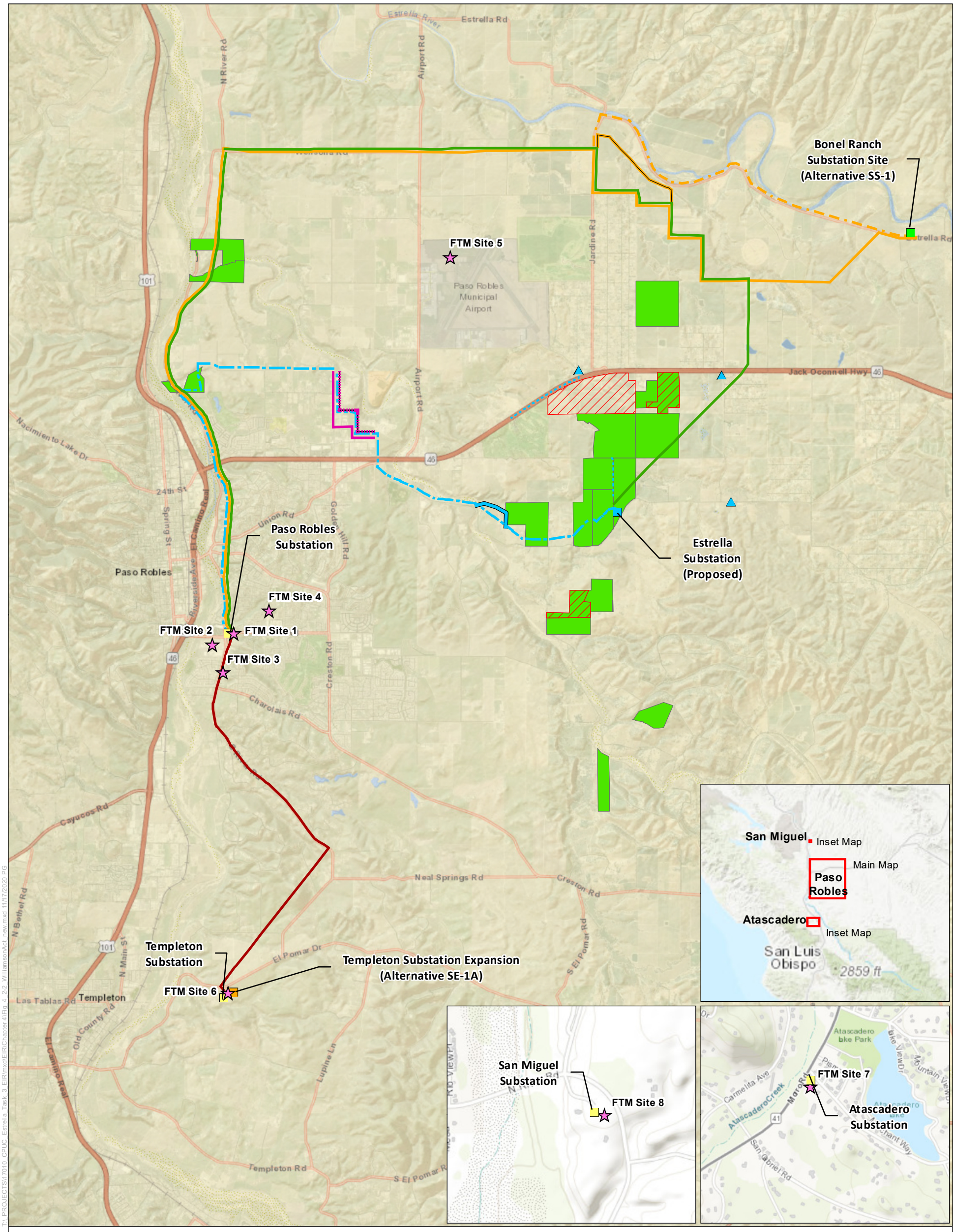

Proposed Project

- Estrella Substation
- 70kV Route
- 70 kV Minor Route Variation 1

Reasonably Forseeable Distribution Components

- New Distribution Line Segments
- Additional 21/12 kV Pad-Mounted Transformer

Existing Infrastructure

- Existing Substations

Project Alternatives

- Front-of-the-Meter (FTM) Battery Storage Sites (Alternative BS-2)
- Alternative SS-1: Bonel Ranch Substation Site
- Alternative SE-1A: Templeton Substation Expansion - 230/70 kV Substation
- Alternative PLR-1A: Estrella Route to Estrella Substation
- Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1
- Alternative PLR-1C: Minor Route Variation 1
- Alternative PLR-1C: Minor Route Variation 2
- Alternative PLR-3A: Strategic Undergrounding, Option 1
- Alternative PLR-3B: Strategic Undergrounding, Option 2
- Alternative SE-PLR-2: Templeton-Paso South River Road Route

Williamson Act Lands

- Williamson Act Non-Renewal
- Williamson Act Lands (2016)

N

0 1 Miles

Horizon WATER and ENVIRONMENT

Figure 4.2-2
Williamson Act Lands

Source: ESRI 2018, PG&E 2019, SCWA 2017, CDOC 2016

Note: The route variations shown are offset and simplified in order to display the alignments of the alternative routes that may overlap in places

Estrella Substation and
Paso Robles Area Reinforcement Project

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4.2.4 Impact Analysis

Methodology

The analysis of agriculture and forestry resource impacts was both quantitative and qualitative in nature and involved comparing aspects of the Proposed Project, reasonably foreseeable distribution components, and alternatives to the significance criteria described below. The analysis considered the existing laws, regulations, and policies described in Section 4.2.2, "Regulatory Setting" and in Appendix A, as well as the existing land uses and agricultural resources described in Section 4.2.3, "Environmental Setting."

Criteria for Determining Significance

Based on Appendix G of the CEQA Guidelines, the Proposed Project, reasonably foreseeable distribution components, and alternatives would result in a significant impact on agriculture and forestry resources if they would:

A. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to nonagricultural 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 PRC Section 12220[g]), timberland (as defined by PRC 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 in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits; or

E. Involve other changes in the existing environment that, because of their location or nature, could result in a conversion of Farmland to a nonagricultural use.

Because there are no forest lands or timberland in the vicinity of the Proposed Project, reasonably foreseeable distribution components, or alternatives, criteria "C" and "D" above are dismissed from detailed consideration.

Environmental Impacts

Proposed Project

Impact AG-1: Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use – *Significant and Unavoidable*

The proposed substation site and portions of the 70 kV powerline route are located on areas of Important Farmland and the proposed substation site is currently an active vineyard. Therefore, installation of the Proposed Project components would result in conversion of agricultural lands

to non-agricultural uses. Additionally, staging areas and temporary work areas (e.g., pole work area, pull sites) would be sited on lands under agricultural use and/or mapped as Important Farmland, resulting in temporary impacts to these uses. Table 4.2-2 shows the permanent agricultural land conversion and temporary impacts to agricultural land that would occur as a result of the Proposed Project.

Table 4.2-2. Agricultural Land Impacts from the Proposed Project

FMMP Category	Estrella Substation (acres)	Power Line Route (acres)	Total (acres)
Permanent Conversion			
Prime Farmland	-	<0.01	<0.01
Farmland of Statewide Importance	2.66	<0.01	2.66
Unique Farmland	11.70	0.06	11.76
Farmland of Local Importance	-	0.02	0.02
Farmland of Local Potential	0.70	0.25	0.95
Grazing Land	0.11	0.29	0.40
Total	**15.17**	**0.62**	**15.79**
Temporary Impacts			
Prime Farmland	-	0.69	0.69
Farmland of Statewide Importance	0.32	4.58	4.90
Unique Farmland	5.90	19.38	25.28
Farmland of Local Importance	-	5.71	5.71
Farmland of Local Potential	-	40.76	40.76
Grazing Land	0.02	21.10	21.12
Total	**6.24**	**92.22**	**98.46**

Source: CDOC 2016b

Permanent conversion of agricultural land would occur from removal of existing vineyards at the substation site and removal of existing vineyard and row crops for the placement of lattice steel towers (LSTs), tubular steel poles (TSPs), and light-duty steel poles (LDSPs) as part of the 70 kV power line route construction. The entire substation site would be graded and developed as part of the substation construction, which would involve removal of all the vineyard crops currently on the site. Permanent conversion of agricultural land along the Proposed Project's 70 kV power line would occur within the immediate footprint of individual poles, as well as 10-foot radius around each pole that would be maintained clear of vegetation. As shown in Table 4.2-2, the Proposed Project (substation and power line) would permanently convert 2.66 acres of Farmland of Statewide Importance and 11.76 acres of Unique Farmland to non-agricultural uses. Additionally, 0.69 acres of Prime Farmland, 4.9 acres of Farmland of Statewide Importance, and 25.28 acres of Unique Farmland would be temporarily affected by the

Proposed Project construction activities. Temporary effects include temporary loss or destruction of crops, placement of rock and materials, compaction of soil from heavy equipment and vehicles, and removal of topsoil.

The permanent conversion of Important Farmland to non-agricultural uses that would occur from development of the Proposed Project would constitute a significant impact. Land with the high-quality soils and characteristics necessary to produce high yields of the State's valued produce is a limited resource, and Important Farmland is under continued threat from urbanization pressures throughout California. To reduce this impact, **Mitigation Measure AG-1** would be implemented, which would require contribution of funds to the California Farmland Conservancy Fund to support conservation of agricultural land in San Luis Obispo County. Implementation of this mitigation measure would help ensure protection and preservation of high-quality agricultural lands elsewhere in the County; however, this compensatory mechanism would not fully offset the significant impact because it would not create any new Important Farmland (rather, it would protect existing agricultural land). As such, the acreage lost due to the Proposed Project would still be lost permanently. Therefore, this impact would remain significant.

With respect to temporary impacts on Important Farmland, the Applicants would implement APM AG-1, which would require that the Applicants coordinate with farmers, ranchers, and landowners to schedule Proposed Project construction activities in a manner that avoids conflicts with harvest and planting periods, to the extent feasible, and that minimizes disruptions to agricultural operations. Additionally, following construction, all areas temporarily disturbed by the Proposed Project would be restored by the Applicants to the extent practicable, including returning areas to their original contours and drainage patterns (see Chapter 2, Section 2.5.5, "Cleanup and Restoration"). While these measures would reduce the severity of temporary impacts, the temporary impacts to agricultural lands could still be significant if removed crops were not replanted and/or if the long-term productivity of these areas were adversely affected (e.g., due to soil compaction). To reduce these potentially significant impacts, **Mitigation Measure AG-2** would be implemented, which would require that the Proposed Project Applicants restore agricultural lands following construction activities to pre-project conditions, including replacement of topsoil/crops and de-compaction of soils, if necessary. This mitigation measure would avoid any long-lasting or residual impacts on agricultural land from the Proposed Project construction activities, so construction impacts on agricultural lands would be less than significant.

Overall, in spite of implementation of mitigation measures, the permanent loss of agricultural land that would occur from the Proposed Project would remain a significant impact. No other feasible mitigation measures were identified to reduce this impact to a level that is less than significant. Therefore, this impact is **significant and unavoidable**.

Mitigation Measure AG-1: Provide Compensation for Loss of Agricultural Land.

HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall contribute sufficient funds (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives. The California Farmland Conservancy

Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements. The amount of HWT's and PG&E's contribution shall ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by the Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.

Mitigation Measure AG-2: Restore Agricultural Land Temporarily Impacted by Construction Activities.

HWT or PG&E shall ensure that agricultural land temporarily impacted by construction activities is adequately restored following completion of construction to pre-project conditions. These include areas impacted from establishment of temporary staging and storage areas, installation of the underground fiber optic cable link, installation of the 230 kV interconnection structures, preparation and temporary use of pull sites and crossing guard structures, and preparation and use of helicopter landing zones. Restoration of sites will involve removing any rock or material imported to stabilize the site, replacement of topsoil, de-compacting any soil that has been compacted by heavy equipment, and re-planting of agricultural crops. The responsibility of performing these various tasks may be stipulated in an agreement between HWT, PG&E, and the landowner(s) completed for the Proposed Project or alternatives. If a landowner is better equipped or prefers to replant crops or perform other tasks themselves, then HWT and PG&E shall provide just compensation for this work.

Impact AG-2: Conflict with existing zoning for agricultural use or a Williamson Act contract – *Significant and Unavoidable*

As described in Section 4.2.3, the entire proposed Estrella Substation site and portions of the 70 kV power line route are within the County's Agriculture land use designation. Additionally, portions of the power line route would border or pass through the City's Agriculture and Residential Agriculture zoning districts. The Proposed Project components would not further the fundamental purpose of these land use designations and zoning districts, which is to encourage and protect agricultural uses in these areas; however, transmission lines and public utility facilities are allowed uses in all City and County land use and zoning categories (see Section 4.11, "Land Use and Planning" for further discussion). Therefore, the Proposed Project would not conflict with existing zoning for agricultural use.

The entire substation site and portions of the 70 kV power line route would be located on land under Williamson Act contracts. As described in the PEA, based on the utility exemption in the Williamson Act, the approximately 15-acre substation site would be created as a separate legal parcel and removed from the larger 98-acre Williamson Act contract (NEET West and PG&E 2017). The existing contract would be modified to reflect the remaining 83-acre contracted area, with the provisions of the original contract continuing to apply in the same manner as before the creation of the separate substation parcel (NEET West and PG&E 2017).

The County of San Luis Obispo's Rules of Procedure to Implement the California Land Conservation Act of 1965 (i.e., Williamson Act) identify 20 to 40 acres as the minimum acreage

for parcels or contiguous parcels of prime land[1] to qualify for an agricultural preserve (County of San Luis Obispo 2019). Therefore, the reduction of the current 98-acre Williamson Act parcel down to 83 acres would not disqualify the proposed 15-acre substation parcel as an agricultural preserve according to San Luis Obispo County. However, placing the substation within the existing parcel under Williamson Act contract would conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use. Although **Mitigation Measure AG-1** and **Mitigation Measure AG-2** would be implemented, a significant impact would still occur. No feasible mitigation is available that could create new and equivalent farmland to replace the Williamson Act contract land, and thus, this impact would be significant and unavoidable.

While the substation would substantially conflict with the existing Williamson Act contract on the substation site, the small areas of permanent conversion of agricultural lands that would occur at the locations of new 70 kV power line poles would not substantially affect the status of the existing Williamson Act contract parcels. Electric facilities are identified under Government Code Section 51238 as a compatible use on lands under a Williamson Act contract. Therefore, the effects of the 70 kV power line would not be significant.

Overall, construction and operation of the Proposed Project components would conflict with a Williamson Act contract. Therefore, this impact would be **significant and unavoidable**.

Impact AG-3: Involve other changes in the existing environment that, because of their location or nature, could result in a conversion of Farmland to a nonagricultural use – *Less than Significant*

The Proposed Project would not involve any other changes that, because of their location or nature, could result a conversion of Farmland to a non-agricultural use. As noted above, Important Farmland has generally been on the decline in California (CDOC 2020b) (although some increases in certain Farmland categories have occurred in San Luis Obispo County in recent years [CDOC 2014]) and is continually subject to urbanization pressures. As such, often, with increasing urbanization and development, there is potential for loss of Farmland to non-agricultural uses. While the Proposed Project, with buildout of the reasonably foreseeable distribution components, would accommodate future growth in the Paso Robles area, potentially resulting in conversion of agricultural land to non-agricultural uses, it would not directly cause this growth. As discussed in Section 4.14, "Population and Housing," planners at the City of Paso Robles anticipate growth to occur in the area south of the airport and south of

[1] The definition of prime land under the County of San Luis Obispo Rules of Procedure to Implement the California Land Conservation Act of 1965 (County of San Luis Obispo 2019) includes:

1. Lands with Natural Resources Conservation Service land capability rating of Class 1 or Class 2 (all land to qualify for these ratings must be irrigated), or
2. Other irrigated lands that have suitable soils, climate and water supply which sustain irrigated crops valued according to one of the following criteria:
    a. Land planted in crops which have produced an annual gross value of $1,000 or more per acre for three of the previous five years.
    b. Land planted in orchards, vineyards and other perennial crops that would produce an average annual gross value of $1,000 or more per acre if in full commercial bearing.

SR-46, irrespective of the Proposed Project, and which would generally follow the City of Paso Robles General Plan.

Based on the above analysis, this impact would be **less than significant.**

Reasonably Foreseeable Distribution Components and Ultimate Substation Buildout

The reasonably foreseeable distribution components, in particular the southern new distribution line segment, would pass through agricultural areas mapped as Unique Farmland and subject to an existing Williamson Act contract. However, this new distribution line segment would be installed along an existing dirt road through the agricultural property and the small-diameter, direct-embedded distribution poles would not reasonably result in substantial conversion of any of this Farmland. Likewise, the presence of the pole structures would not in any way conflict with zoning for agricultural use or the Williamson Act contract. The temporary impacts to agricultural uses during construction of the reasonably foreseeable distribution components (e.g., installation of individual distribution poles, stringing and pulling of the conductor, etc.) would be minimized through implementation of APM AG-1. The northern reasonably foreseeable new distribution line segment would be installed primarily within the median of SR-46 and would not substantially affect Important Farmland, zoning for agricultural uses, or Williamson Act contracts. Similarly, the additional 21/12 kV pad-mounted transformers would be installed along existing roads and would not affect any agricultural uses.

With respect to ultimate substation buildout, installation of additional transmission and distribution transformers and associated equipment within the 70 kV and 230 kV substations is assumed to not result in any additional permanent ground disturbance. However, construction of an additional 230 kV interconnection under the ultimate buildout scenario would involve some conversion of Farmland due to the footprints of the LSTs, although precise acreages are unknown at this time and impacts are speculative. Additionally, construction of additional distribution feeders and 70 kV lines from the Estrella Substation in the future could impact Farmland, zoning for agricultural use, and Williamson Act lands, but these impacts are speculative at this time. Overall, impacts under significance criteria A and B would be **less than significant.**

As discussed above under Impact AG-3, the Proposed Project, reasonably foreseeable distribution components, and ultimate substation buildout would accommodate anticipated future growth by providing additional electric distribution service capacity to the Paso Robles area. Given that urbanization is a major cause of ongoing losses of Important Farmland (CDOC 2020b), some of this future growth may result in conversion of Important Farmland to non-agricultural use. However, while the Proposed Project, reasonably foreseeable distribution components, and ultimate substation buildout would accommodate growth, the construction and operation of these facilities would not directly cause growth. Therefore, impacts under significance criterion E would be **less than significant.**

Alternatives

No Project Alternative

Under the No Project Alternative, no substation or 70 kV power line would be constructed. Therefore, no direct conversion of Important Farmland to non-agricultural use would occur and the Williamson Act parcel containing the proposed Estrella Substation site would remain unchanged from existing conditions. Overall, **no impact** would occur under significance criteria A, B, or E.

Alternative SS-1: Bonel Ranch Substation Site

The Alternative SS-1 site would be located on areas of Farmland of Local Importance, as well as Farmland of Local Potential, and is currently used to grow alfalfa. Placement of a substation in this location would result in permanent conversion of roughly 15 acres of these agricultural lands to non-agricultural uses. As part of the substation site preparation and grading, all of the existing crops in the substation footprint would be removed and the soil would be removed/graded to the construction specifications. Additionally, temporary impacts to agricultural lands adjacent to the substation site would occur due to establishment of staging areas and work areas, including tower work areas for installation of the 230 kV interconnection towers. While the substation would convert agricultural lands to non-agricultural uses, the Farmland of Local Importance and Farmland of Local Potential classifications are not considered significant under significance criterion A. Although this land is identified as important to the local agricultural economy, it is generally inferior to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. As a result, the permanent conversion of roughly 15 acres of agricultural land that would occur under Alternative SS-1 would be less than significant. Additionally, implementation of APM AG-1 would reduce the temporary effects of construction on the ongoing agricultural uses on the remainder of the property. Therefore, impacts under significance criterion A would be **less than significant.**

The Alternative SS-1 site is designated for Agriculture by the County. Although the substation under Alternative SS-1 would not fulfill the fundamental intent of the County's Agriculture designation to promote agricultural uses, it would not conflict with this land use designation. As discussed under Impact AG-2, transmission lines and public utility facilities are allowed uses in all City and County land use and zoning categories. Therefore, Alternative SS-1 would not conflict with existing zoning for agricultural use. The Bonel Ranch parcel is not under a Williamson Act contract; therefore, there would be no potential to conflict with a Williamson Act contract. As a result, impacts under significance criterion B would be **less than significant.**

As discussed above under Impact AG-3, a new substation along with buildout of distribution components would accommodate anticipated future growth by providing additional electric distribution service capacity to the Paso Robles area. Given that urbanization is a major cause of ongoing losses of Important Farmland (CDOC 2020b), some of this future growth may result in conversion of Important Farmland to non-agricultural use. However, while the substation and distribution components would accommodate the growth, they would not directly cause it. Therefore, impacts under significance criterion E would be **less than significant.**

Alternative PLR-1A: Estrella Route to Estrella Substation

The Alternative PLR-1A alignment would extend through areas of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Farmland of Local Potential, including agricultural areas dominated by vineyards. The 70 kV power line structures would primarily be installed along existing roads (e.g., Wellsona Road), as well as within the existing 500/230 kV transmission corridor, but individual pole foundations would still result in small areas of permanent agricultural land conversion to non-agricultural uses. Based on GIS analysis, the Alternative PLR-1A 70 kV power line would permanently impact less than 0.5 acre of Prime Farmland, less than 1.5 acre of Farmland of Statewide Importance, and roughly 2.5 acres of Unique Farmland. Temporary impacts to agricultural lands would occur at the location of staging areas, pole work areas, pulling sites, etc. Alternative PLR-1A also could impact agricultural lands due to the need to establish permanent or temporary access roads to pole locations for conducting maintenance.

While permanent conversions of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland from Alternative PLR-1A would be both small in acreage and isolated at pole locations spaced hundreds of feet apart (and, therefore, unlikely to substantially affect operations in the remainder of affected fields); these conversions would still be considered significant. Implementation of **Mitigation Measure AG-1** would reduce the severity of these impacts, but not to a level that is less than significant. No other feasible mitigation is available to reduce this significant impact. Additionally, temporary impacts to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland would be significant if agricultural uses/crops were not adequately restored following construction and/or if soil productivity were adversely affected over the long term (e.g., due to soil compaction). Implementation of APM AG-1 would reduce the severity of the temporary effects of construction on the agricultural uses along the Alternative PLR-1A alignment, and **Mitigation Measure AG-2** would reduce potential for adverse long-term construction-related impacts (see discussion under Impact AG-1). Due to the permanent conversion of Farmland, however, impacts under significance criterion A would be **significant and unavoidable.**

The Alternative PLR-1A alignment would primarily extend through the County's Agriculture land use designation, with a small portion in Residential Suburban. Within the City of Paso Robles, a small portion of the reconductoring segment for Alternative PLR-1A would be within the City's Agriculture zoning district, with the remainder extending through Residential Single Family, Residential Duplex/Triplex, and Commercial-General Retail (the same as the Proposed Project 70 kV reconductoring segment). As discussed under Impact AG-2, transmission lines and public utility facilities are allowed uses in all City and County land use and zoning categories. Therefore, Alternative PLR-1A would not conflict with existing zoning for agricultural use. Small portions of the Alternative PLR-1A alignment would cross through land under Williamson Act contracts (see Figure 4.2-2). However, as described in Impact AG-2, electric facilities are identified under Government Code Section 51238 as a compatible use on lands under a Williamson Act contract, and the individual poles would not substantially affect the Williamson Act contract lands. As a result, impacts under significance criterion B would be **less than significant.**

Alternative PLR-1A, when combined with the Estrella Substation and distribution components, would accommodate anticipated future growth by providing additional electric distribution service capacity to the Paso Robles area. Given that urbanization is a major cause of ongoing losses of Important Farmland (CDOC 2020b), some of this future growth may result in

conversion of Important Farmland to non-agricultural use. However, while the alternative, Estrella Substation, and distribution components would accommodate the growth, they would not directly cause it. Therefore, impacts under significance criterion E would be **less than significant.**

Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1

The Alternative PLR-1C alignment would extend through areas of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Farmland of Local Potential, including agricultural areas dominated by vineyards. The 70 kV power line structures would primarily be installed along existing roads (e.g., Wellsona Road), as well as within the existing 500/230 kV transmission corridor, but individual pole foundations would still result in small areas of permanent agricultural land conversion to non-agricultural uses. Based on GIS analysis, the Alternative PLR-1A 70 kV power line would permanently impact less than 0.25 acre of Prime Farmland, roughly 1 acre of Farmland of Statewide Importance, and less than 1 acre of Unique Farmland. Temporary impacts to agricultural lands would occur at the location of staging areas, pole work areas, pulling sites, etc. Alternative PLR-1C also could impact agricultural lands due to the need to establish permanent or temporary access roads to pole locations for conducting maintenance.

While permanent conversions of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland from Alternative PLR-1C would be of small acreage and occur at isolated pole locations spaced hundreds of feet apart (and therefore, unlikely to substantially affect operations in the remainder of affected fields); these conversions would still be considered significant. Implementation of **Mitigation Measure AG-1** would reduce the severity of these impacts, but not to a level that is less than significant. No other feasible mitigation is available to reduce this significant impact. Temporary impacts to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland could be significant if agricultural uses/crops were not adequately restored following construction and/or if soil productivity were adversely affected over the long term (e.g., due to soil compaction). Implementation of APM AG-1 would reduce the severity of the temporary effects of construction on the agricultural uses along the Alternative PLR-1A alignment. Further, **Mitigation Measure AG-2** would be implemented, which would reduce potential for adverse long-term construction-related impacts (see discussion under Impact AG-1). Due to the permanent conversion of Farmland, impacts under significance criterion A would be **significant and unavoidable.**

The Alternative PLR-1C alignment would primarily extend through the County's Agriculture land use designation, while the reconductoring segment would extend through the same City zoning districts as Alternative PLR-1A's reconductoring segment. As discussed under Impact AG-2, transmission lines and public utility facilities are allowed uses in all City and County land use and zoning categories. Therefore, Alternative PLR-1C would not conflict with existing zoning for agricultural use. Small portions of the Alternative PLR-1C alignment (limited to the reconductoring segment) would cross through land under Williamson Act contracts (see Figure 4.2-2). However, as described in Impact AG-2, electric facilities are identified under Government Code Section 51238 as a compatible use on lands under a Williamson Act contract. Additionally, 70 kV power line poles already exist in these areas and replacement of existing poles under Alternative PLR-1C would not affect Williamson Act contract status. As a result, impacts under significance criterion B would be **less than significant.**

Alternative PLR-1C, when combined with Alternative SS-1 and distribution components, would accommodate anticipated future growth by providing additional electric distribution service capacity to the Paso Robles area. Given that urbanization is a major cause of ongoing losses of Important Farmland (CDOC 2020b), some of this future growth may result in conversion of Important Farmland to non-agricultural use. However, while the alternative, the Alternative SS-1 substation, and distribution components would accommodate the growth, they would not directly cause it. Therefore, impacts under significance criterion E would be **less than significant.**

Alternative PLR-3: Strategic Undergrounding (Options 1 & 2)

The Alternative PLR-3 undergrounding route (both options) would not extend through any areas of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. The routes would pass through some areas of Farmland of Local Importance, Farmland of Local Potential, and Grazing Land, but the 70 kV power line segment under Alternative PLR-3 would be almost entirely underground (other than the small transition stations on either end of the alignments) and would not permanently substantial agricultural land. Much of the lengths of both Alternative PLR-3 options would be installed within existing roads, which would have no effects on agricultural uses. Some temporary impacts to Farmland of Local Importance, Farmland of Local Potential, and Grazing Land would occur from trenching activities and from temporary work areas. Due to the fact that Prime Farmland, Farmland of Statewide Importance, and Unique Farmland would not be affected, this impact would not be significant. Additionally, implementation of APM AG-1 would reduce the severity of the temporary effects on agricultural uses along the Alternative PLR-3 alignments. Therefore, impacts under significance criterion A would be **less than significant.**

The Alternative PLR-3B Option 2 alignment would traverse a small area of the Agriculture zoning district. However, as discussed under Impact AG-2, transmission lines and public utility facilities are allowed uses in the Agriculture zoning district. Therefore, Alternative PLR-3 would not conflict with existing zoning for agricultural use. No portions of either Alternative PLR-3 option would cross parcels under a Williamson Act contracts. Therefore, impacts under significance criterion B would be **less than significant.**

Alternative PLR-3, when combined with the remainder of the Proposed Project and the reasonably foreseeable distribution components, would accommodate anticipated future growth by providing additional electric distribution service capacity to the Paso Robles area. Given that urbanization is a major cause of ongoing losses of Important Farmland (CDOC 2020b), some of this future growth may result in conversion of Important Farmland to non-agricultural use. However, while the alternative, the remainder of the Proposed Project, and the reasonably foreseeable distribution components would accommodate the growth, they would not directly cause it. Therefore, impacts under significance criterion E would be **less than significant.**

Alternative SE-1A: Templeton Substation Expansion – 230/70 kV Substation

The Alternative SE-1A site would be located on areas of Farmland of Local Importance, as well as Farmland of Local Potential. Placement of a substation in this location would result in permanent conversion of roughly 15 acres of these agricultural lands to non-agricultural uses. As part of the substation site preparation and grading, any existing crops in the substation footprint would be removed and the soil would be removed/graded to the construction specifications. Additionally, temporary impacts to agricultural lands adjacent to the substation site would occur

due to establishment of staging areas and work areas, including tower work areas for installation of the 230 kV interconnection towers. While the substation would convert agricultural lands to non-agricultural uses, the Farmland of Local Importance and Farmland of Local Potential classifications are not considered significant under significance criterion A. Although this land is identified as important to the local agricultural economy, it is generally inferior to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. As a result, the permanent conversion of roughly 15 acres of agricultural land that would occur under Alternative SE-1A would be less than significant. Additionally, implementation of APM AG-1 would reduce the temporary effects of construction on the ongoing agricultural uses on the remainder of the property. Therefore, impacts under significance criterion A would be **less than significant.**

The Alternative SE-1A site is designated for Agriculture by the County. Although the substation under Alternative SE-1A would not fulfill the fundamental intent of the County's Agriculture designation to promote agricultural uses, it would not conflict with this land use designation. As discussed under Impact AG-2, transmission lines and public utility facilities are allowed uses in all City and County land use and zoning categories. Therefore, Alternative SE-1A would not conflict with existing zoning for agricultural use. The Templeton Substation Expansion site parcel is not under a Williamson Act contract; therefore, there would be no potential to conflict with a Williamson Act contract. As a result, impacts under significance criterion B would be **less than significant.**

As discussed above under Impact AG-3, a new substation along with buildout of distribution components would accommodate anticipated future growth by providing additional electric distribution service capacity to the Paso Robles area. Given that urbanization is a major cause of ongoing losses of Important Farmland (CDOC 2020b), some of this future growth may result in conversion of Important Farmland to non-agricultural use. However, while the substation and distribution components would accommodate the growth, they would not directly cause it. Therefore, impacts under significance criterion E would be **less than significant.**

Alternative SE-PLR-2: Templeton-Paso South River Road Route

The Alternative SE-PLR-2 alignment would extend through a small area of Farmland of Statewide Importance, as well as some areas of Farmland of Local Importance and Farmland of Local Potential. The majority of the 70 kV power line under Alternative SE-PLR-2 would extend through areas of Grazing Land, Other Land, and Urban and Built-Up Land, as shown in Figure 4.2-1. The 70 kV power line structures would primarily be installed along existing roads (e.g., South River Road), as well as within the existing 500/230 kV transmission corridor, but individual pole foundations would still result in small areas of permanent agricultural land conversion to non-agricultural uses. Based on GIS analysis, the Alternative SE-PLR-2 70 kV power line would permanently impact less than 0.3 acre of Farmland of Statewide Importance. Temporary impacts to agricultural lands would occur at the location of staging areas, pole work areas, pulling sites, etc.

While permanent conversions of Farmland of Statewide Importance from Alternative SE-PLR-2 would be of small acreage and occur at isolated pole locations spaced hundreds of feet apart (and therefore, unlikely to substantially affect operations in the remainder of affected fields); these conversions would still be considered significant. Implementation of **Mitigation Measure AG-1** would reduce the severity of these impacts, but not to a level that is less than significant.

No other feasible mitigation is available to reduce this significant impact. Temporary impacts to Farmland of Statewide Importance could be significant if agricultural uses/crops were not adequately restored following construction and/or if soil productivity were adversely affected over the long term (e.g., due to soil compaction). However, implementation of APM AG-1 would reduce the severity of the temporary effects of construction on the agricultural uses along the Alternative PLR-1A alignment. Further, **Mitigation Measure AG-2** would be implemented to reduce potential adverse long-term construction-related impacts (see discussion under Impact AG-1). Due to the permanent conversion of Farmland, impacts under significance criterion A would be **significant and unavoidable.**

The Alternative SE-PLR-2 alignment would primarily extend through the County's Rural Residential and Agriculture land use designations, while the northern portion of the alignment would pass through areas of Paso Robles zoned Residential Single Family and Regional Commercial. As discussed under Impact AG-2, transmission lines and public utility facilities are allowed uses in all City and County land use and zoning categories. Therefore, Alternative SE-PLR-2 would not conflict with existing zoning for agricultural use. No portions of the Alternative SE-PLR-2 alignment would cross through land under Williamson Act contracts. As a result, impacts under significance criterion B would be **less than significant.**

Alternative SE-PLR-2, when combined with Alternative SE-1A and distribution components, would accommodate anticipated future growth by providing additional electric distribution service capacity to the Paso Robles area. Given that urbanization is a major cause of ongoing losses of Important Farmland (CDOC 2020b), some of this future growth may result in conversion of Important Farmland to non-agricultural use. However, while the alternative, the Alternative SE-1A substation, and distribution components would accommodate the growth, they would not directly cause it. Therefore, impacts under significance criterion E would be **less than significant.**

Alternative BS-2: Battery Storage to Address Distribution Need

Of the example FTM sites identified for analysis in the DEIR, only FTM Site 5, 6, and 8 would be located on or adjacent to agricultural land. As shown in Figure 4.2-1, FTM Site 5 would be located on Farmland of Local Importance; FTM Site 6 would be located on Farmland of Local Importance and Farmland of Local Potential, and FTM Site 8 would include areas of Farmland of Local Potential. Placement of FTM BESSs in these example locations would result in permanent conversion of agricultural lands to non-agricultural uses. Because the sizes of individual FTM BESSs are not known at this time and would be based on future load growth in the Paso Robles area, the precise acreage of impacts is not known. The most impactful option would be a 50 megawatt/400 megawatt-hour flow battery at Templeton Substation (i.e., FTM Site 6), which would have a footprint of roughly 9.1 acres. Lithium-ion BESSs at example FTM Sites 5, 6, or 8 would result in substantially less conversion of agricultural land.

Temporary construction-related impacts to Farmland from FTM BESS construction could be significant if agricultural uses/crops within disturbance areas were not adequately restored following construction and/or if soil productivity were adversely affected over the long term (e.g., due to soil compaction). However, implementation of measures to restore temporarily impacted lands would reduce the severity of these effects.

Only the potential FTM Site 6 is on land designated for Agriculture by the County. Remaining example FTM sites are on lands designated/zoned Residential Single Family, Regional Commercial, Airport, Public Facility, and Residential Suburban. Other FTM sites identified or selected in the future could potentially be located on lands designated for agricultural uses in the City or County jurisdiction. As discussed under Impact AG-2, transmission lines and public utility facilities (which would include BESSs) are allowed uses in all City and County land use and zoning categories. Therefore, Alternative BS-2 would not be anticipated to conflict with existing zoning for agricultural use. None of the example FTM sites are under Williamson Act contracts..

The FTM BESSs would provide a similar function to the Proposed Project and reasonably foreseeable distribution components in accommodating anticipated future growth by providing additional electric distribution service capacity to the Paso Robles area. Given that urbanization is a major cause of ongoing losses of Important Farmland (CDOC 2020b), some of this future growth may result in conversion of Important Farmland to non-agricultural use. However, while the FTM BESSs would accommodate the growth, they would not directly cause it.

Overall, because FTM BESS sites were selected for illustrative purposes only, BESS installations have neither been designed nor technologies selected, and the specifics of Alternative BS-2 are unknown, project-level determinations cannot be made as impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is provided for any of the significance criteria.

Alternative BS-3: Behind-the-Meter Solar and Battery Storage

The specific locations of development sites under Alternative BS-3 are unknown; however, individual BTM solar and battery storage facilities would likely be installed on or within existing buildings. In these situations, installation of BTM facilities would have no potential to impact agricultural lands. Even in situations where a commercial, industrial, or residential property owner were to install new BTM facilities on previously undeveloped portions of their property, this would have little potential to result in significant conversion of Important Farmland to non-agricultural uses or conflicts with existing zoning for agricultural use or a Williamson Act contract. In most cases, BTM facilities would be relatively small and would not affect existing land uses. On a cumulative level, installation of multiple BTM facilities would reduce loading within the Paso Robles area and could thereby avoid conventional distribution system investments (e.g., new distribution feeders). In this respect, Alternative BS-3 would serve to reduce the need for future conversions of Farmland to nonagricultural uses.

Overall, due to the fact that specific locations and characteristics of BTM resources procured under Alternative BS-3 are unknown at this time, project-level impact determinations are not possible as the impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is reached under any of the significance criteria.

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