



COUNTY OF SAN LUIS OBISPO

Department of Agriculture/Weights and Measures

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March 20, 2008

Mary Dyas, Project Manager
California Energy Commission (CEC)
Energy Facilities Siting Division
1516 Ninth St, MS-15
Sacramento, CA 95814

DOCKET	
07-AFC-8	
DATE	MAR 20 2008
RECD.	APR 01 2008

RE: San Luis Obispo County Department of Agriculture Response to Review of the Carrizo Energy Solar Farm Project (67-AF2-8)

Ms. Dyas:

The County of San Luis Obispo Agriculture Department (Ag Dept) appreciates the opportunity to review and comment on the above-referenced project for issues of concern specifically related to agricultural resources and operations in San Luis Obispo County.

The analysis prepared by URS provides some information relating to agricultural resources. However, additional information, inclusion of county agriculture policies, and analysis of potential impacts to agricultural resources is recommended, as is updated water resource analysis. Attached you will find further detail on these issues (Attachment A) plus comments specific to the analysis prepared by URS (Attachment B).

We appreciate your consideration of our input as the CEC conducts their internal analysis and completion of the Preliminary Staff Assessment. We look forward to reviewing the draft environmental document. Should you have any questions, please give me a call at 805-781-5753.

Sincerely,

Michael Isensee, Agricultural Resource Specialist

cc: John McKenzie, Senior Planner, County Planning & Building Dept.

PROOF OF SERVICE (REVISED 2/5/08) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 4/1/08
CF

Attachment A: County Agriculture Department Review

Agricultural Resource Information

Most of the northern Carrizo area is utilized for dry-farmed crops and for grazing. Based upon county records, it appears that the project site has been utilized for dry-farmed hay and grain production in recent years. Recent aerial photos and the county's pesticide registration records show regular and ongoing agricultural use of the site.

The project site (excluding the construction laydown area) consists of a single soil complex, *Yeguas Pinspring complex*, which the Natural Resources Conservation Service breaks down into two map units.

Soil Symbol, Name & Slope	Irrigated Capability	Non-irrigated Capability	Proportion of Project Site
310 Yeguas Pinspring complex, 0-2%,	2	4	95%
311 Yeguas Pinspring complex 2-5%,	2	4	5%
TOTAL ACRES			640

Source: Web Soil Survey, Natural Resource Conservation Service.

The project site and area would be considered Important Farmland classified as *Farmland of Local Importance* through locally adopted ordinance under 7 CFR 657.5.(d). Because the soil has approximately nine inches of available water capacity, it is productive farmland for dryland farming even with the area's low rainfall. The site and area have a long and continuous history of use for dry-farmed grain production and for cattle grazing, both important components of the county's agricultural economy. At the current time, there is nothing that precludes the continued use of the project site for agricultural use.

The northern Carrizo Plains contains approximately 22,000 acres of quality farmland capable of non-irrigated field crop production due to the quality soils, large parcel sizes and limited incompatible development. This area remains the largest single area of dry-farmed crop production in the county, with between 10,500 and 13,900 acres identified annually for field crop use in recent years (2004-current).

County Policy

San Luis Obispo County includes an Agriculture Element within its General Plan. This element outlines four Agricultural Goals, including AG2: Conserve Agricultural Resources and AG3: Protect Agricultural Lands as well as thirty-four Agricultural Policies including AGP11: Agricultural Water Supplies and AGP18: Location of Improvements. The document can be found at <http://www.slocounty.ca.gov/Assets/PL/Elements/Ag+Open+Space+Element.pdf>

Agricultural Resource Impacts and Mitigation

The Ag Dept recommends an agricultural resource section be included in the environmental document that analyzes potential impacts to the site's agricultural resources, considers county and state policy to protect farmland from conversion, and incorporates feasible mitigation for impacts to agricultural resources and operations.

The proposed project is unrelated to either agricultural crop production or to agricultural processing. As a non-agricultural use, County agriculture policies recommend limiting impacts to soil and water resources and to agricultural operations.

The proposed energy facility will permanently convert 640 acres of agricultural land capable of supporting dry-farmed grain production. This represents a substantial conversion of Important Farmland. The proposed project would also utilize an additional 380 acres for a "construction laydown" area. Portions of this area will be converted to create a permanently turn-around access for large construction vehicles. The remaining agricultural land will be temporarily removed from agricultural use and may be adversely impacted unless measures are taken to protect and restore the area.

The Ag Dept understands the CEC utilizes the state-adopted LESA model to analyze potential farmland conversion impacts. Preliminary analysis using LESA suggests the conversion of the site would be considered a significant impact based primarily upon the high storic index (excellent rating), project size (640+ acres), and surrounding agricultural land (>90%).

The Ag Dept recommends consideration of feasible mitigation options for farmland conversion. Options include the utilization of a easement program which directly protects farmland of equivalent value and size in the County, or the payment of mitigation fees adequate to protect an equivalent amount of similar farmland in the County.

Other potential agricultural resource impacts to be addressed include:

- Protection of the soil from chemical or material contamination in the construction laydown area.
- Control of dust during construction and operation in from both the construction laydown area and power plant site.
- Restoration of farmland capability in the construction laydown area at the conclusion of construction activities.
- Minimization or avoidance of the use of groundwater resources for non-agricultural use throughout the operational life of the project.
- Minimization or avoidance of off-site stormwater and associated erosion impacts through on-site stormwater control.

Attachment B: URS Application for Certification, October 2007

1. In section 5.9.2.2, *Agricultural Land*, the document should clarify that the project site and surrounding area are utilized and have a history of dry-farm field crop production and grazing. The northern Carrizo Plains contains approximately 22,000 acres of quality farmland capable of non-irrigated field crop production due to the quality soils, large parcel sizes and limited incompatible development. This area remains the largest single area of dry-farmed crop production in the county, with between 10,500 and 13,900 acres identified annually for field crop use in recent years (2004-current).
2. Under section 5.9.2.2, the third paragraph should note that County energy policies support the development of solar power systems in the county while ensuring environmental impacts associated with these systems should be mitigated (Energy Element, Policy 39). This is later noted in 5.9.5.3.4.1 but not in this section.
3. Under section 5.9.3, *Cumulative Impacts*, the document should clarify that several other solar power system projects have initiated discussions with the County regarding development in the same region. The cumulative impact to agricultural resources may be considered significant.
4. Under section 5.9.5.2.3, the final sentence should be clarified that the site and surrounding area would be classified as important farmland (*Farmland of Local Importance*) by the state based upon locally adopted policy. San Luis Obispo County defines *Farmland of Local Importance* as "areas of soils that meet all the characteristics of Prime or Statewide, with the exception of irrigation. Additional farmlands include dryland field crops of wheat, barley, oats and safflower" (http://www.conservation.ca.gov/dlrp/fmmp/Documents/Local_definitions_00.pdf)
5. Under section 5.9.5.3.2, the purpose and character statements for Agriculture designated lands should be referenced. These are found in the *Inland Area Framework for Planning*, Chapter 6, Section B, Description of Land Use Categories.
6. In Section 5.9.5.3.5, *Agriculture and Open Space Element*, the document states that the affected area is composed mainly of rangeland used for grazing operations. County records indicate recent and historic use of the site for dry-farmed field crop production. This information is already reflected elsewhere in the document (see, for example Section 5.9.2.2 and Section 5.6.1.2). The agricultural use should include dry-farmed field crop production.
7. Table 5.18-2 should include SUB2003-00352, a proposed agricultural cluster subdivision located approximately one mile from the project site.
8. Section 5.5 and Appendix K, *Water Resources*, appear to only contain information primarily from 1965 and 1984 regarding groundwater resources. More recent information and analysis would be useful. Groundwater resources were analyzed by the project applicants for SUB2003-00352 (noted in #8, above).
9. Section 5.5.5.3 *Local* should identify Agriculture Policy 11, Agricultural Water Supplies as a relevant local policy.

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
For the *CARRIZO ENERGY*
***SOLAR FARM* PROJECT**

Docket No. 07-AFC-8

PROOF OF SERVICE
(Revised 2/5/2008)

INSTRUCTIONS: All parties shall either (1) send an original signed document plus 12 copies or (2) mail one original signed copy AND e-mail the document to the address for the Docket as shown below, AND (3) all parties shall also send a printed or electronic copy of the document, which includes a proof of service declaration to each of the individuals on the proof of service list shown below:

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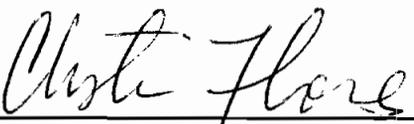
DECLARATION OF SERVICE

I, Christina Flores, declare that on April 1, 2008, I deposited copies of the attached Agency Comments – SLO County Agriculture Department in the United States mail at Sacramento, CA with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.



Christina/Flores