

# Appendix G

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General Plan Consistency Analysis

Table G-1 is an analysis of the proposed planting ordinance's consistency with the applicable goals and policies of the County of San Luis Obispo General Plan (including the area plan and community plans) that relate to avoiding or mitigating environmental impacts. The analysis only includes policies relevant to the proposed planting ordinance. As stated in Section 2.5.4 in Section 2, *Project Description*, and detailed in Appendix C, the proposed planting ordinance includes amendments to the Agriculture Element (Policies AG1, AGP10, and AGP11) as well as the Conservation and Open Space Element (Policy WR 1.14). Text that is underlined indicates that the County will be adding it to the General Plan, and text that is in ~~striethrough~~ indicates the County will be removing it from the General Plan.

**Table G-1 Policy Consistency: County of San Luis Obispo General Plan**

Section	Policy	Consistency Discussion
<b>Agriculture Element</b>		
Goal AG1	<p><b>Support County Agricultural Production.</b></p> <p>a. Support and promote a healthy and competitive agricultural industry whose products are recognized in national and international markets as being produced in San Luis Obispo County.</p> <p>b. Facilitate agricultural production by allowing a broad range of uses and agricultural support services to be consistently and accessibly located in areas of prime agricultural activity.</p> <p>c. Support ongoing efforts by the agricultural community to develop new techniques and new practices.</p> <p>d. Develop agricultural permit processing procedures that are rapid and efficient. Do not require permits for agricultural practices and improvements that are currently exempt, with the exception of a groundwater offset program in the Paso Robles Groundwater Basin, excluding the Atascadero sub-basin, as shown in Figure 2-2 ministerial permits to regulate production agriculture irrigated with groundwater wells within the Paso Basin Land Use Management Area. Keep the required level of permit processing for non-exempt projects at the lowest possible level consistent with the protection of agricultural resources, sensitive habitats, and groundwater supply.</p>	<p><b><u>Proposed Amendment.</u></b> The proposed planting ordinance would amend part d. of this goal to allow for ministerial permits to regulate crop production irrigated with groundwater wells within the Paso Basin Land Use Management Area (PBLUMA) instead of citing a groundwater offset program in the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin). The proposed planting ordinance is not considered a “groundwater offset program” because it allows an exemption for farms to increase groundwater use for irrigation without requiring the increase to be offset.</p> <p><b><u>Potentially Consistent.</u></b> With this amendment, the proposed planting ordinance would be consistent with Goal AG1. The proposed planting ordinance would require ministerial planting permits or exemptions for new and expanded crop production.</p> <p>The proposed planting ordinance is intended to support agricultural production by allowing farmers to irrigate cropland who are not allowed to by the existing agricultural offset requirements. However, this allowance would result in increased groundwater extraction from an impacted groundwater resource, potentially resulting in reduced groundwater availability for existing agricultural producers using the same shared groundwater basin, as discussed in Section 4.1, <i>Agriculture and Forestry Resources</i>. The reduction in available groundwater could result in changes to crop types on some planting permit sites to non-irrigated crops or crops that require less water. Planting permit applicants may also need to dig deeper water wells to be able to use groundwater. These negative impacts to existing growers are not necessarily inconsistent with Goal AG1, as competition for limited water resources is an inherent part of the agricultural industry in the PBLUMA.</p> <p>Mitigation measure UTIL-1, Well Metering and Reporting, would add a Condition of Approval to the San Luis Obispo County Code for planting permit applicants to install well meters. UTIL-2, Hydrology Report, would add a Condition of Approval to the San Luis Obispo County Code requiring planting permit applicants to submit hydrology reports to the County of San Luis Obispo (See Section 4.13, <i>Utilities and Service Systems</i>). UTIL-1 would ensure that the increased groundwater pumping allowed by the proposed planting ordinance is consistent with agricultural Best Management Practices for irrigation efficiency, and UTIL-2 would reduce localized hydrology impacts to nearby groundwater wells. These mitigation measures are consistent with part d of Goal AG1, which allows for an increase in the required level of permit processing for non-exempt agricultural activities to protect agricultural resources, sensitive habitats, and groundwater supply.</p>

Section	Policy	Consistency Discussion
Goal AG2	<p><b>Conserve Agricultural Resources.</b></p> <p>a. Maintain the agricultural land base of the county by clearly defining and identifying productive agricultural lands for long-term protection.</p> <p>b. Conserve the soil and water that are the vital components necessary for a successful agricultural industry in this county.</p> <p>c. Establish land-use policies in this element that support the needs of agriculture without impeding its long-term viability.</p>	<p><u>Potentially Consistent.</u> The proposed planting ordinance would not change existing mapping or land use criteria for the County’s Agriculture land use category, which are intended to conserve agricultural resources.</p> <p>Grading for site preparation, construction of accessory infrastructure, and operational agricultural activities have the potential to increase erosion and loss of topsoil. However, agricultural activities facilitated by the proposed planting ordinance would comply with existing regulations which require implementation of best management practices to reduce soil erosion from construction, grading, and operational agricultural activities. (see Section 4.8, <i>Hydrology and Water Quality</i>, for a full discussion of impacts to soil resources).</p> <p>While the proposed planting ordinance does allow for an increase in groundwater extraction from a currently overdrafted groundwater resource, the increased groundwater use would be for agricultural purposes which is consistent with this goal. In addition, the long-term viability of this groundwater resource for agricultural use is dependent on other regulatory efforts and infrastructure projects beyond land-use policies (e.g., Sustainable Groundwater Management Act [SGMA]).</p>
Goal AG3	<p><b>Protect Agricultural Lands.</b></p> <p>a. Establish criteria in this element for agricultural land divisions that will promote the long-term viability of agriculture.</p> <p>b. Maintain and protect agricultural lands from inappropriate conversion to nonagricultural uses. Establish criteria in this element and corresponding changes in the Land Use Element and Land Use Ordinance for when it is appropriate to convert land from agricultural to non-agricultural designations.</p> <p>c. Maintain and strengthen the county’s agricultural preserve program (Williamson Act) as an effective means for long-term agricultural land preservation.</p> <p>d. Provide incentives for landowners to maintain land in productive agricultural uses.</p>	<p><u>Potentially Consistent.</u> The proposed planting ordinance would not change existing mapping or land use criteria for the County’s Agriculture land use category, which limits agricultural land divisions based on the existing or potential use of the land for cropland and grazing and limits allowable uses to those compatible with agriculture. As discussed in Section 4.1, <i>Agriculture and Forestry Resources</i>, the proposed planting ordinance would not affect the contract compliance status of properties under a Williamson Act contract that have maintained their required qualifying agricultural use since they entered a contract (e.g., grazing, dry farm crops, or irrigated crops); therefore, the proposed planting ordinance would not conflict with an existing Williamson Act contract. Additionally, applicants applying for planting permits under the proposed planting ordinance and anticipating qualifying for new Williamson Act contracts would be limited in the types of irrigated crops allowed so as not to exceed the 25-AFY limitation (See Section 4.2, <i>Agricultural Resources</i>). Furthermore, the proposed planting ordinance would specifically help address part d. of Goal AG3, as the proposed planting ordinance would encourage agricultural operations through the 25 AFY exemption, although the resulting increase in groundwater extraction could lead to pumping reductions and fallowing elsewhere in the PBLUMA. Growers may also need to install deeper water wells to be able to use groundwater. However, drawdown of groundwater in the PBLUMA and/or installing deeper wells would not directly convert farmland to non-agricultural use, and the planting ordinance would not result in a net decrease in the total acreage of planted crops. As discussed in Section 4.1, <i>Agriculture and Forestry Resources</i>, the potential to convert agricultural lands to non-agricultural uses is less than significant.</p>

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Section	Policy	Consistency Discussion
Policy AGP10	<p><b>Water Conservation.</b></p> <p>a. Encourage water conservation through feasible and appropriate “best management practices.” Emphasize efficient water application techniques; the use of properly designed irrigation systems; and the control of runoff from croplands, rangelands, and agricultural roads.</p> <p>b. Encourage the U.C. Cooperative Extension to continue its public information and research program describing water conservation techniques that may be appropriate for agricultural practices in this county. Encourage landowners to participate in programs that conserve water.</p> <p><del>c. In the Paso Robles Groundwater Basin (excluding the Atascadero Sub-basin), require new agricultural water use to be offset through mechanisms such as a water offset program.</del></p>	<p><b><u>Proposed Amendment.</u></b> The planting ordinance would remove part c. of Policy AGP10 that requires new agricultural water use to be offset to allow for the 25 AFY per site water use exemption that does not need to be offset.</p> <p><b><u>Potentially Inconsistent.</u></b> The water duty factors in the proposed planting ordinance, developed in consultation with U.C. Cooperative Extension, are based on irrigated crops' water needs to maximize crop yield assuming the use of best management practices for efficient irrigation. As discussed in Section 4.13, <i>Utilities and Service Systems</i>, most agricultural operations within the County currently implement best management practices to ensure water supplies are used efficiently in the PBLUMA. These measures include measuring and recording water use during irrigation, measuring soil moisture to help guide irrigation applications, using evapotranspiration data to help determine how much irrigation water to apply, assessing both water and soil chemistry to make any needed adjustments to irrigation (e.g., to avoid salinity stress), and measuring plant water stress to ensure that the irrigation program is achieving its goals. In addition, it is reasonable to assume that planting permit applicants would manage agricultural operations in a manner which would avoid wasteful use of water from overirrigation because overirrigation reduces crop productivity and increases operational cost.</p> <p>Proposed mitigation measure UTIL-1, Well Metering and Reporting, would add a Condition of Approval to the San Luis Obispo County Code for planting permit and 25-AFY exemption applicants to install well meters. UTIL-1 would ensure that the increased groundwater pumping allowed by the proposed planting ordinance is consistent with agricultural Best Management Practices for irrigation efficiency.</p> <p>As also detailed in Section 4.13, <i>Utilities and Service Systems</i>, the County is engaged in several current practices, and evaluating future potential practices, to improve water supply resiliency in the PBLUMA. These include encouraging the U.C. Cooperative Extension to continue its public information and research program describing water conservation techniques that may be appropriate for agricultural practices in North County, providing financial support for irrigation audits and recommendations to improve irrigation systems to reduce water usage, and promoting the use of stormwater capture for groundwater recharge. The proposed ordinance would not interfere with implementation of the County’s water supply resiliency efforts.</p> <p>See Section 4.13, <i>Utilities and Service Systems</i>, for more information regarding agricultural best management practices, County water resiliency efforts, and mitigation measures for water conservation.</p> <p>The proposed planting ordinance would allow for up to 25 AFY of groundwater extraction that would not be required to be offset. Therefore, the planting ordinance is potentially inconsistent with the intent of Policy AGP10 to require new agricultural water use to be offset. Therefore, a General Plan amendment would be required to resolve the policy inconsistency.</p>

Section	Policy	Consistency Discussion
Policy AGP11	<p><b>Agricultural Water Supplies.</b></p> <p>a. Maintain water resources for production agriculture, both in quality and quantity, so as to prevent the loss of agriculture due to competition for water with urban and suburban development.</p> <p>b. Do not approve proposed general plan amendments or rezonings that result in increased residential density or urban expansion if the subsequent development would adversely affect: (1) water supplies and quality, or (2) groundwater recharge capability needed for agricultural use.</p> <p>c. Do not approve facilities to move groundwater from areas of overdraft to any other area, as determined by the Resource Management System in the Land Use Element.</p>	<p><u>Potentially Consistent.</u> The proposed planting ordinance would not change existing Paso Robles Groundwater Basin Planning Area Standards (Land Use Ordinance, Section 22.94.025) that require a 2:1 water offset for new non-agricultural development requiring a discretionary land use permit and prohibit general plan amendments and land divisions until the groundwater supply is designated Level of Severity I or better. As detailed in Appendix B, the proposed planting ordinance would not facilitate construction of residential uses, such as worker housing. Groundwater extractions allowed by the proposed planting ordinance would be used for on-site agricultural irrigation within the Paso Robles Groundwater Subbasin and would not be moved to other sites. The proposed planting ordinance would not allow transfers of planting credits for new plantings between sites of different ownership.</p> <p>The proposed planting ordinance does allow for an increase in groundwater extraction from an overdrafted groundwater resource to allow farmers to irrigate who are not allowed to by the existing agricultural offset requirements (See Section 4.8, <i>Hydrology and Water Quality</i>, and Section 4.13, <i>Utilities and Service Systems</i>). While the proposed planting ordinance does allow for an increase in groundwater extraction from a currently overdrafted groundwater resource, the increased groundwater use would be for agricultural purposes which is consistent with this goal. In addition, subsequent to public review of the draft proposed planting ordinance between October 25 and November 24, 2021, the proposed planting ordinance was revised to change the wording “commercial crop production” to “production agriculture” to ensure the increased groundwater extraction allowed by the planting ordinance benefits production agriculture, consistent with Policy AGP11.</p>
Policy AGP18	<p><b>Location of Improvements</b></p> <p>Locate new buildings, access roads, and structures so as to protect agricultural land.</p>	<p><u>Potentially Consistent.</u> The purpose of this policy is to protect agricultural lands from encroaching development that is incompatible with agriculture. The proposed planting ordinance would result in the construction of on-site accessory agricultural facilities such as groundwater wells , agricultural reservoirs, internal access roads, fencing, and irrigation lines. These facilities would be in direct support of new agricultural activities that are established under the proposed planting ordinance. As detailed in Appendix B, the planting ordinance would not facilitate construction of new buildings, including agricultural accessory structures or worker housing. The planting ordinance could facilitate construction of agricultural roads; however, such roads would be located on agricultural properties and would be intended to support agricultural operations. The proposed planting ordinance would result in an increase in the use of farmland for agricultural purposes in the PBLUMA and would not convert existing agricultural uses to non-agricultural uses.</p>
Policy AGP24	<p><b>Conversion of Agricultural Land.</b></p> <p>a. Discourage the conversion of agricultural lands to non-agricultural uses through the following actions:</p> <ol style="list-style-type: none"> <li>1. Work in cooperation with the incorporated cities, service districts, school districts, the County Department of Agriculture, the Agricultural Advisory</li> </ol>	<p><u>Potentially Consistent.</u> The proposed planting ordinance would not change existing mapping of urban service and urban reserve lines and village reserve lines within the PBLUMA (<i>as stated in Section 4.2, Agricultural Resources</i>) or the existing Paso Robles Groundwater Basin Planning Area Standards (Land Use Ordinance, Section 22.94.025).</p> <p>The proposed planting ordinance would not require revisions or amendments to zoning or land use designations within the PBLUMA, would result in an increase in the use of Farmland for</p>

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	<p>Liaison Board, Farm Bureau, and affected community advisory groups to establish urban service and urban reserve lines and village reserve lines that will protect agricultural land and will stabilize agriculture at the urban fringe.</p> <p>2. Establish clear criteria in this plan and the Land Use Element for changing the designation of land from Agriculture to non-agricultural designations.</p> <p>3. Avoid land redesignation (rezoning) that would create new rural residential development outside the urban and village reserve lines. 4. Avoid locating new public facilities outside urban and village reserve lines unless they serve a rural function or there is no feasible alternative location within the urban and village reserve lines.</p>	<p>agricultural purposes in the PBLUMA, and would not convert existing agricultural uses to non-agricultural uses.</p>
<b>Conservation and Open Space Element (COSE)</b>		
Goal AQ3	State and federal ambient air quality standards will, at a minimum, be attained and maintained.	<p><u>Potentially Inconsistent.</u> Criteria pollutants generated by construction and operation of agricultural activities allowed by the proposed ordinance would exceed applicable San Luis Obispo Air Pollution Control District (SLOAPCD) thresholds (See Section 4.2, <i>Air Quality</i>). Mitigation Measure AQ-1, Construction Emissions Reductions, would reduce emissions generated by construction equipment. Air quality impacts resulting from the proposed planting ordinance would continue to exceed air quality standards even with implementation of mitigation, and impacts would remain significant and unavoidable which is potentially inconsistent with Goal AQ3 and Policy AQ 3.2. However, the proposed planting ordinance is consistent with the overall County goal to reduce air quality emissions as the intent of Mitigation Measure AQ-1 is to reduce emissions to the extent feasible.</p>
Policy AQ 3.2	<b>Attain Air Quality Standards.</b> Attain or exceed federal or state ambient air quality standards (the more stringent if not the same) for measured criteria pollutants.	<p><u>Potentially Inconsistent.</u> See consistency analysis for Goal AQ3.</p>
Policy AQ 3.3	<b>Avoid air pollution increases.</b> Avoid a net increase in criteria air pollutant emissions in planning areas certified as Level of Severity II or III for Air Quality by the County’s Resource Management System (RMS).	<p><u>Potentially Inconsistent.</u> The PBLUMA is located in an area certified as Level of Severity II for the criteria air pollutants ozone, particulate matter (PM) 2.5, and PM 10. Construction and agricultural activities resulting from the proposed planting ordinance would increase emissions of criteria pollutants (See Section 4.2, <i>Air Quality</i>). Emissions resulting from the proposed planting ordinance would be cumulatively considerable from a regional standpoint. Mitigation Measure AQ-1 would decrease emissions from all pollutant sources. Air quality impacts resulting from the proposed planting ordinance would continue to exceed air quality standards even with implementation of mitigation, and impacts would remain significant and unavoidable which is</p>

Section	Policy	Consistency Discussion
		<p>potentially inconsistent with Policy AQ 3.3. However, the proposed planting ordinance is consistent with the overall County goal to reduce air quality emissions as the intent of Mitigation Measure AQ-1 is to reduce emissions to the extent feasible.</p>
<p>Policy AQ 3.4</p>	<p><b>Toxic exposure.</b> Minimize public exposure to toxic air contaminants, ozone, particulate matter, sulfur dioxide, carbon monoxide, nitrogen oxides, and lead.</p>	<p><u>Potentially Consistent.</u> As detailed in Section 4.2, <i>Air Quality</i>, sensitive receptors located near the agricultural sites would be anticipated to be limited to residential uses on the agricultural properties within the PBLUMA. Construction and operational activities would be intermittent and would require minimal equipment. Because air quality emissions would be intermittent and only in the vicinity of residential uses on the agricultural properties, public exposure to air quality pollutants would be minimized.</p>
<p>Goal AQ4</p>	<p>Greenhouse gas emissions from County operations and communitywide sources will be reduced from baseline levels by a minimum of 15% by 2020.</p>	<p><u>Potentially Inconsistent.</u> Goal AQ4 was applicable to the year 2020. The proposed planting ordinance would be effective between 2022 and 2045; therefore, this goal is not directly applicable to the project. Nevertheless, as discussed in Section 4.7, <i>Greenhouse Gas Emission</i>, the proposed planting ordinance would generate greenhouse gas emissions in excess of SLOACD’s significance thresholds. Mitigation Measure GHG-1 would reduce impacts involving greenhouse gases by requiring carbon sequestration practices for applicants under the proposed ordinance. However, GHG impacts would remain significant and unavoidable.</p>
<p>Policy AQ 4.1</p>	<p><b>Reduce greenhouse gas emissions.</b> Implement and enforce State legislative or regulatory standards, policies, and programs designed to reduce greenhouse gas emissions</p>	<p><u>Potentially Inconsistent.</u> As discussed in Section 4.7, <i>Greenhouse Gas Emissions</i>, the County develops policies to reduce GHG emissions within the County to comply with the State regulations to reduce GHG emissions in accordance with Assembly Bill 32, Senate Bill 32, Senate Bill 1383, Senate Bill 100, Executive Order B-55-18, and Executive Order N-79. The majority of the regulations and policies to reduce GHG emissions are at Local City, County, Regional, and State level and do not specifically address project level emissions reductions. Mitigation Measure GHG-1 would reduce impacts involving greenhouse gases by requiring carbon sequestration practices for applicants under the proposed ordinance. Regardless, new or expanded agricultural activities facilitated by the proposed planting ordinance would result in an overall increase in GHG emissions which would be significant and unavoidable, which is potentially inconsistent with the intent of Policy AQ 4.1 to reduce GHG emissions.</p>
<p>Policy AQ 4.4</p>	<p><b>Development projects and land use activities.</b> Reduce greenhouse gas emissions from development projects and other land use activities.</p>	<p><u>Potentially Inconsistent.</u> The proposed planting ordinance would generate greenhouse gas emissions in excess of SLOACD’s significance thresholds, which is potentially inconsistent with Policy AQ 4.4. Mitigation Measure GHG-1 would reduce impacts involving land use and greenhouse gases by requiring carbon sequestration practices for applicants under the proposed ordinance. However, GHG impacts would remain significant and unavoidable.</p>
<p>Goal AQ5</p>	<p>The County will adapt to adverse climate change.</p>	<p><u>Potentially Consistent.</u> The PBLUMA is anticipated to experience decreased precipitation and increased extreme heat due to climate change. Data is not available to reliably estimate the effects of these patterns on crop water duty factors. The proposed planting ordinance is intended to protect water resources in the PBLUMA for agricultural use, which would increase community resilience to climate change through conservation of water resources that might otherwise be scarce during climate change-induced droughts or extreme heat.</p>

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Section	Policy	Consistency Discussion
Policy AQ 5.1	<b>Adapt to climate change.</b> Identify needs and strategies to monitor, prepare for, and adapt to a changing climate.	<u>Potentially Consistent.</u> See consistency analysis for Goal AQ5.
Goal BR1	Native habitat and biodiversity will be protected, restored, and enhanced.	<u>Potentially Inconsistent.</u> As discussed in Section 4.3 <i>Biological Resources</i> , Mitigation Measure BIO-1 requires plantings to be setback at least 50 feet from the edge of riparian vegetation and wetland areas. Regardless, the planting ordinance would result in significant and unavoidable impacts to biological resources (including native habitats, special-status plant or animal species, wetlands, riparian habitat, and wildlife movement).
Policy BR 1.1	<b>Protect sensitive biological resources.</b> Protect sensitive biological resources such as, wetlands, migratory species of the Pacific flyway, and wildlife movement corridors through: 1) environmental review of proposed development applications, including consideration of cumulative impacts, 2) participation in comprehensive habitat management programs with other local and resource agencies, and 3) acquisition and management of open space lands that provide for permanent protection of important natural habitats	<u>Potentially Consistent.</u> See consistency analysis for Goal BR1.
Policy BR 1.2	<b>Limit development impacts.</b> Regulate and minimize proposed development in areas that contain essential habitat for special-status species, sensitive natural communities, wetlands, coastal and riparian habitats, and wildlife habitat and movement corridors as necessary to ensure the continued health and survival of these species and protection of sensitive areas.	<u>Potentially Inconsistent.</u> See consistency analysis for Goal BR1.
Policy BR 1.4	<b>No net loss.</b> Require that development projects are approved with conditions and mitigation measures to ensure the protection of sensitive resources and to achieve “no net loss” of sensitive habitat acreage, values, and function. Give highest priority to avoidance of sensitive habitat. When avoidance is not feasible, require provision of replacement habitat onsite through restoration and/or habitat creation. When onsite mitigation is not feasible, provide for offsite mitigation that reflects no net loss.	<u>Potentially Inconsistent.</u> See consistency analysis for Goal BR1.
Policy BR 1.10	<b>Identify and protect ecologically sensitive areas.</b> Protect and enable management of ecologically sensitive areas to the maximum extent feasible.	<u>Potentially Inconsistent.</u> See consistency analysis for Goal BR1.

Section	Policy	Consistency Discussion
Policy BR 1.11	<p><b>Protect wildlife nursery areas and movement corridors.</b> Identify, protect, and enable the management of connected habitat areas for wildlife movement. Features of particular importance to wildlife for movement may include, but are not limited to, riparian corridors, shorelines of the coast and bay, and ridgelines. Identification and designation of wildlife corridors will not interfere with agricultural uses on private lands.</p>	<p><u>Potentially Inconsistent.</u> As discussed in Section 4.3, <i>Biological Resources</i>, implementation of the proposed planting ordinance may substantially interfere with wildlife movement, including fish migration or the use of a native wildlife nursery, from installation of fencing, increased agricultural activities, human activity, trash, and noise. Impacts to wildlife movement corridors would be significant and unavoidable.</p>
Policy BR 1.12	<p><b>Development impacts to corridors.</b> Ensure that important corridors for wildlife movement and dispersal are protected as a condition of discretionary permits. Provide linkages and corridors as needed to connect sensitive habitat areas such as woodlands, forests, and wetlands</p>	<p><u>Potentially Inconsistent.</u> See consistency analysis for Policy BR 1.11.</p>
Goal BR2	<p>Threatened, rare, endangered, and sensitive species will be protected.</p> <p>Section 404 of the federal Clean Water Act requires that authorization pursuant to a Nationwide or Individual permit be obtained prior to the discharge of dredged or fill material into Waters of the United States. A permit under Section 404 of the Clean Water Act also requires that “no net loss” of federal wetlands take place as a condition of permit issuance with mitigation ratios typically varying from 2:1 to 3:1</p>	<p><u>Potentially Inconsistent.</u> As discussed in Section 4.3, <i>Biological Resources</i>, new and expanded agriculture would be required to comply with the Clean Water Act (which requires obtaining Section 404 permits, as applicable). Regardless, the planting ordinance would result in significant and unavoidable impacts to threatened, rare, endangered, and sensitive species.</p>
Policy BR 2.6	<p><b>Development impacts to listed species.</b> Ensure that potential adverse impacts to threatened, rare, and endangered species from development are avoided or minimized through project siting and design. Ensure that proposed development avoids significant disturbance of sensitive natural plant communities that contain special-status plant species or provide critical habitat to special-status animal species. When avoidance is not feasible, require no net loss of sensitive natural plant communities and critical habitat areas.</p>	<p><u>Potentially Inconsistent.</u> See consistency analysis for Goal BR2.</p>

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Section	Policy	Consistency Discussion
Goal BR3	Maintain the acreage of native woodlands, forests, and trees at 2008 levels.	<u>Potentially Consistent.</u> The PBLUMA does not include a substantial amount of land that is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, as stated in the Initial Study (Appendix A) and Section 4.14, <i>Effects Found Not to Be Significant</i> . The removal of oak woodlands to allow for irrigated crop production would be subject to the County’s Oak Woodland Ordinance (Land Use Ordinance, Section 22.58.060), which requires discretionary permits subject to environmental review for clear-cutting of an acre or more. Compliance with this standard would reduce the potential impact to existing acreage of native oak woodlands to less than significant.
Policy BR 3.1	<b>Native tree protection.</b> Protect native and biologically valuable trees, oak woodlands, trees with historical significance, and forest habitats to the maximum extent feasible	<u>Potentially Consistent.</u> See consistency analysis for Goal BR3.
Goal BR4	The natural structure and function of streams and riparian habitat will be protected and restored.	<u>Potentially Inconsistent.</u> As discussed in Section 4.3 <i>Biological Resources</i> , Mitigation Measure BIO-1 requires plantings to be setback at least 50 feet from the edge of riparian vegetation and wetland areas. Regardless, implementation of the proposed planting ordinance would result in significant and unavoidable impacts to sensitive habitats, including riparian and wetland habitats, through modification or depletion of surface flows and groundwater levels. Therefore, the proposed planting ordinance is potentially inconsistent with Goal BR4.
Policy BR 4.1	<b>Protect stream resources.</b> Protect streams and riparian vegetation to preserve water quality and flood control functions and associated fish and wildlife habitat.	<u>Potentially Inconsistent.</u> See consistency analysis for Goal BR4.
Goal CR3	The County’s historical resources will be preserved and protected.	<u>Potentially Inconsistent.</u> Construction and operational agricultural activities facilitated by the proposed planting ordinance would result in significant and unavoidable impacts to historic resources (See Section 4.4, <i>Cultural Resources</i> ).
Goal CR4	The County’s known and potential Native American, archaeological, and paleontological resources will be preserved and protected.	<u>Potentially Inconsistent.</u> Implementation of the proposed planting ordinance would result in significant and unavoidable impacts to archaeological resources (See Section 4.4, <i>Cultural Resources</i> ) and paleontological resources (See Section 4.6, <i>Geology and Soils</i> ).
Policy CR 3.1	<b>Historic preservation.</b> The County will provide for the identification, protection, enhancement, perpetuation, and use of features that reflect the County’s historical, architectural, Native American, archaeological, cultural, and aesthetic heritage	<u>Potentially Inconsistent.</u> See consistency analysis for Goal CR3, Goal CR4, and Policy CR 4.2.

Section	Policy	Consistency Discussion
Policy CR 4.2	<b>Protection of Native American cultural sites.</b> Ensure protection of archaeological sites that are culturally significant to Native Americans, even if they have lost their scientific or archaeological integrity through previous disturbance. Protect sites that have religious or spiritual value, even if no artifacts are present. Protect sites that contain artifacts, which may have intrinsic value, even though their archaeological context has been disturbed.	<u>Potentially Inconsistent.</u> Implementation of the proposed planting ordinance would result in significant and unavoidable impacts to tribal cultural resources (See Section 4.12, <i>Tribal Cultural Resources</i> ).
Policy CR 4.5	<b>Paleontological resources.</b> Protect paleontological resources from the effects of development by avoiding disturbance where feasible.	<u>Potentially Inconsistent.</u> See consistency analysis in Goal CR4.
Goal E3	Energy efficiency and conservation will be promoted in both new and existing development.	<u>Potentially Consistent.</u> Energy use during construction of agricultural operations allowed by the proposed planting ordinance would be in the form of fuel consumption to operate heavy equipment, irrigation systems, light-duty vehicles, and machinery (See Section 4.5, <i>Energy</i> ). It is reasonable to assume that construction activities would be conducted in a manner to avoid wasteful, inefficient, and unnecessary fuel consumption in order to reduce construction costs. Operation of diesel-powered equipment is necessary for agricultural processes. In the interest of time and cost, such equipment would not be operated any more than is necessary to maintain and harvest crops, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources. Activities allowed by the proposed planting ordinance would also comply with San Luis Obispo County’s EnergyWise Plan, which aims to decrease fuel consumption and greenhouse gas emissions.
Policy E 3.2	<b>Energy efficient equipment.</b> Require the use of energy-efficient equipment in all new development, including but not limited to Energy Star appliances, high-energy efficiency equipment, heat recovery equipment, and building energy management systems.	<u>Potentially Consistent.</u> See consistency analysis for Goal E3.
Goal SL3	Important Agricultural Soils will be conserved.	<u>Potentially Consistent.</u> The proposed planting ordinance would allow planting of irrigated crops for production agriculture on sites in the PBLUMA that are not allowed to under the existing agricultural offset requirements. The proposed planting ordinance would not result in conversion of agricultural lands to non-agricultural uses. Additionally, as discussed in Section 4.8, <i>Hydrology and Water Quality</i> , agricultural activities would be required to implement erosion and sediment control best management practices to reduce erosion and loss of topsoil.

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Section	Policy	Consistency Discussion
Policy SL 3.1	<b>Conserve important agricultural soils.</b> Conserve the Important Agricultural Soils mapped in Figure SL-1 and listed in Table SL-2. Proposed conversion of agricultural lands to non-agricultural uses shall be evaluated against the applicable policies in this COSE and in the Agriculture Element, including policies such as Policies AGP 18 and AGP 24.	<u>Potentially Consistent.</u> See consistency analysis for Goal SL3.
Goal WR1	The natural and agricultural landscape will continue to be the dominant view in rural parts of the county.	<u>Potentially Consistent.</u> The new and expanded planting of irrigated crops allowed by the planting ordinance is consistent with this goal. County planning documents do not identify sensitive visual resource areas in the PBLUMA. Activities allowed by the proposed planting ordinance would maintain an agricultural landscape and preserve rural separation between communities.
Policy WR 1.1	<b>Adopt scenic protection standards.</b> Protect scenic views and landscapes, especially visual Sensitive Resource Areas (SRAs) from incompatible development and land uses.	<u>Potentially Consistent.</u> See consistency analysis for Goal VR1.
Goal WR1	The County will have a reliable and secure regional water supply (IRWM).	<u>Potentially Consistent.</u> The proposed planting ordinance would result in significant and unavoidable impacts to the groundwater supply in the PBLUMA, which are discussed in Section 4.8, <i>Hydrology and Water Quality</i> and Section 4.13, <i>Utilities and Service Systems (Water Supply)</i> . The proposed planting ordinance allows for an increase in groundwater extraction from an overdrafted groundwater resource, to allow farmers to irrigate who are not allowed to by the existing agricultural offset requirements. Feasible mitigation, including UTIL-1 and UTIL-2, are proposed to reduce impacts as much as possible while meeting project objectives. While impacts to water supply would remain significant and unavoidable, the proposed planting ordinance remains consistent with County policies as UTIL-1 and UTIL-2 are designed to conserve the County’s water supply. In addition, obtaining reliable and secure water supplies is dependent on the water management agencies and other regulatory efforts and infrastructure projects beyond land-use policies (e.g., SGMA).
Policy WR 1.1	<b>Protect water supplies.</b> Continue to coordinate with water suppliers and managers to identify water management strategies to protect existing and secure new water supplies.	<u>Potentially Consistent.</u> The County would implement the proposed planting ordinance in tandem with ongoing efforts to implement the Paso Robles Subbasin GSP, in coordination with the other GSAs, and to develop infrastructure projects and decentralized water management strategies (e.g., stormwater capture and recharge) with input from regional collaboration such as that of the Water Resources Advisory Committee (WRAC).

Section	Policy	Consistency Discussion
Policy WR 1.2	<b>Conserve water resources.</b> Water conservation is acknowledged to be the primary method to serve the county’s increasing population. Water conservation programs should be implemented countywide before more expensive and environmentally costly forms of new water are secured.	<u>Potentially Consistent.</u> As discussed in Section 4.13, <i>Utilities and Service Systems</i> , most agricultural operations within the County currently implement best management practices to ensure water supplies are used efficiently in the PBLUMA. These measures include measuring and recording water use during irrigation, measuring soil moisture to help guide irrigation applications, using evapotranspiration data to help determine how much irrigation water to apply, assessing both water and soil chemistry to make any needed adjustments to irrigation (e.g., to avoid salinity stress), and measuring plant water stress to ensure that the irrigation program is achieving its goals. In addition, it is reasonable to assume that planting permit applicants would manage agricultural operations in a manner which would avoid wasteful use of water from overirrigation because overirrigation reduces crop productivity and operational cost. In addition, proposed mitigation in Section 4.8, <i>Hydrology and Water Quality</i> and Section 4.13, <i>Utilities and Service Systems (Water Supply)</i> requires well metering and use reporting for plantings allowed by the proposed planting ordinance, to ensure water use is within allowed volumes based on best management practices to incorporate water conservation. Regardless, the proposed planting ordinance would increase use of the County’s groundwater supplies. The County continues to offer rebates for household and commercial turf removal and plumbing fixture retrofits to promote water conservation and engage in GSP implementation efforts, which can effectively restrict existing individual groundwater extractors.
Policy WR 1.3	<b>New water supply.</b> Development of new water supplies should focus on efficient use of our existing resources. Use of reclaimed water, interagency cooperative projects, desalination of contaminated groundwater supplies, and groundwater recharge projects should be considered prior to using imported sources of water or seawater desalination, or dams and on-stream reservoirs	<u>Potentially Consistent.</u> The County Department of Public Works and Department of Groundwater Sustainability are engaged in interagency cooperative projects to develop groundwater recharge projects in the PBLUMA, separate from the planting ordinance. The objective of the proposed planting ordinance is to use County land use authority to regulate new and expanded irrigated crop planting to limit the agricultural water demand for the groundwater basin resource. Efforts to develop new water supplies are outside the scope of this project, as discussed in Section 4.8, <i>Hydrology and Water Quality</i> and Section 4.13, <i>Utilities and Service Systems</i> .
Policy WR 1.6	<b>Water-dependent species.</b> Protect water sources for water-dependent species and the continuity of riparian communities.	<u>Potentially Inconsistent.</u> See consistency analysis for Goal BR4 and Policy BR 4.1.
Policy WR 1.7	<b>Agricultural operations.</b> Groundwater management strategies will give priority to agricultural operations. Protect agricultural water supplies from competition by incompatible development through land use controls.	<u>Potentially Consistent.</u> The proposed planting ordinance is intended to allow agricultural operations to use groundwater to plant irrigated crops that are not allowed under the existing agricultural offset requirements. The proposed planting ordinance would allow an increase in overall agricultural groundwater use from an overdrafted groundwater basin, but would not result in an increase in non-agricultural water use. The increase in overall groundwater use may impact existing agricultural operations to cause a reduction in acreage in cultivation in certain areas. The planting ordinance may also restrict planting beyond what would be allowed by GSP management actions.  The land use controls in place to protect agricultural water supplies from competition by incompatible development will remain in place, including the Paso Robles Groundwater Basin

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Implementation Strategy WR 1.7.1	<b>Protect agricultural water supplies.</b> Consider adopting land use standards, such as growth management ordinance limits for non-agriculturally-related development on certain rural areas, larger minimum parcel sizes in certain rural areas, and merger of substandard rural parcels, in order to protect agricultural water supplies from competing land uses.	Planning Area Standards (Land Use Ordinance, Section 22.94.025) that restrict general plan amendments and land divisions until the groundwater basin water supply is certified as Level of Severity I or better, and the allowable use standards for the Agriculture land use category.  <u>Potentially Consistent.</u> The proposed planting ordinance would regulate new and expanded irrigated crop plantings and does not include any changes to existing land use standards for non-agricultural uses designed to protect agricultural water supplies from completing land uses.
Policy WR 1.13	<b>Density increases in rural areas.</b> Do not approve General Plan amendments or land divisions that increase the density or intensity of non-agricultural uses in rural areas that have a recommended or certified Level of Severity II or III for water supply until a Level of Severity I or better is reached unless there is an overriding public need.	<u>Potentially Consistent.</u> The proposed planting ordinance would support agricultural uses by allowing the planting of new or expanded irrigated crops. As stated in Appendix B, the proposed planting ordinance is not anticipated to increase population or housing beyond baseline trends or increase intensity of non-agricultural uses.
Policy WR 1.14	<u><b>Avoid-Limit net increase in water use.</b></u> <u>Avoid-Limit</u> a net increase in water use in groundwater basins that are certified as Level of Severity II or III for water supply, <u>except where the net increase is the result of actions to promote the agricultural use of the supply in a manner that is equitable and consistent with groundwater rights.</u> In addition, place limitations on further land divisions in these areas and establish and implement water offset programs for all groundwater users until plans are in place and funded to ensure that the safe yield will not be exceeded.	<u><b>Proposed Amendment.</b></u> <u>The proposed planting ordinance includes a proposed amendment to this policy to limit instead of avoid a net increase in water use “except where the net increase is the result of actions to promote the agricultural use of the supply in a manner that is equitable and consistent with groundwater rights.”</u>  <u>Potentially Inconsistent.</u> The majority of the PBLUMA sources its water from the Paso Robles Groundwater Subbasin, which is certified as Level of Severity III for water supply. The proposed planting ordinance would allow for a net increase in agricultural water use from this groundwater basin. With this amendment, the proposed planting ordinance would be consistent with Policy WR1.14, as the proposed planting ordinance is intended to promote agricultural use of the water supply “in a manner that is equitable and consistent with groundwater rights” by allowing farmers to plant irrigated crops that have not been able to under the existing agricultural offset requirements. The new increase in groundwater use is inconsistent with the intent of Policy WR 1.14 to avoid net increases in water use. Therefore, an amendment to this General Plan policy would be required to resolve this inconsistency.
Goal WR2	The County will collaboratively manage groundwater resources to ensure sustainable supplies for all beneficial uses.	<u>Potentially Consistent.</u> The long-term viability and resiliency of the Paso Robles Subbasin groundwater resource is dependent on other regulatory efforts and infrastructure projects beyond land-use policies (e.g., SGMA). The proposed planting ordinance is intended to continue exercising the County’s land use authority in tandem with implementation of the Paso Robles Subbasin Groundwater Sustainability Plan (GSP) as required by SGMA and other infrastructure projects intended to improve water supply resiliency for North County, such as the potential Salinas Dam expansion. A discussion of the County’s collaborative water resource management

Section	Policy	Consistency Discussion
		<p>efforts in the PBLUMA is included in Section 4.13, <i>Utilities and Service Systems</i>. SGMA specifies that nothing in SGMA or in a GSP shall be interpreted as superseding county land use authority; however, GSAs have the express statutory authority to control groundwater extractions by regulating or limiting extractions from individual wells, subject to certain limitations and water rights considerations. Therefore, GSA management actions may limit the ability of groundwater pumpers to irrigate plantings allowed by the proposed planting ordinance. In addition, the project would likely regulate plantings in certain areas where water use is unlikely to be limited by the GSAs (only area-specific pumping limitations are contemplated in the GSP) and regulate plantings for which an adequate allocation exists under GSP regulations.</p>
<p>Policy WR 2.2</p>	<p><b>Groundwater basin reporting programs.</b> Support monitoring and reporting programs for groundwater basins in the region.</p>	<p><u>Potentially Consistent.</u> The Paso Robles Subbasin GSP sets out a framework for data collection and implementation of increased monitoring requirements to gain a better understanding of groundwater behavior and influences in the Paso Robles Subbasin. Information on water use and pumping by agriculture facilitated by the planting ordinance will likely be available for the GSAs to support their monitoring and reporting programs.</p>
<p>Policy WR 4.1</p>	<p><b>Reduce water use.</b> Employ water conservation programs to achieve an overall 20% reduction in per capita residential and commercial water use in the unincorporated area by 2020. Continue to improve agricultural water use efficiency consistent with Policy AGP 10 in the Agricultural Element.</p>	<p><u>Potentially Consistent.</u> See consistency analysis for Agricultural Element Policy AGP10 above.</p>
<p>Goal WR5</p>	<p>The best possible tools and methods available will be used to manage water resources.</p>	<p><u>Potentially Consistent.</u> The proposed planting ordinance would be a tool to limit the planting of new and expanded irrigated crops using groundwater from wells within the PBLUMA using the County’s land use authority. GSP management actions adopted by the Paso Robles Subbasin GSAs are appropriate tools to mandate pumping reductions for existing groundwater extractors and meter and monitor basin-wide pumping trends and sustainability indicators because GSAs have express statutory authority to control groundwater extractions by regulating or limiting extractions from individual wells, subject to certain limitations and water rights considerations. The County is also exploring opportunities for infrastructure projects to establish supplemental water sources for North County users, outside the scope of this planting ordinance.</p>
<p>Policy WR 5.1</p>	<p><b>Watershed approach.</b> The County will consider watersheds and groundwater basins in its approach to managing water resources in order to include ecological values and economic factors in water resources development.</p>	<p><u>Potentially Consistent.</u> The proposed planting ordinance would regulate planting of new and expanded irrigated crops using groundwater from wells within the PBLUMA using the County’s land use authority. The County Board of Supervisors directed the proposed planting ordinance to apply to the PBLUMA boundary, which differs from the Paso Robles Groundwater Subbasin boundary defined by the California Department of Water Resources for SGMA purposes. However, the boundaries are similar. The analysis in Section 4.8, <i>Hydrology and Water Quality</i> considers a watershed and groundwater basin approach to evaluate impacts and feasible mitigation for the planting ordinance.</p>

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Policy WR 5.2	<b>Climate change.</b> The County will consider ongoing research on long-term changes in climate and precipitation patterns in the county and region and incorporate relevant data in its approach to managing water resources.	<u>Potentially Consistent.</u> The proposed planting ordinance includes crop-specific water duty factors to estimate water use for allowed irrigated crops. These factors are based on best available data. However, projected impacts from reduced precipitation and increased extreme heat patterns due to climate change are not incorporated into the water duty factors in the planting ordinance because there is not available data to establish an accepted methodology of how to so, as discussed in Section 2, <i>Project Description</i> and Appendix B.
Policy WR 5.3	<b>Cooperative water planning and management.</b> Continue to support cooperative, interregional water planning efforts such as the Integrated Regional Water Management Plan, the Resource Management System, and the Water Master Plan.	<u>Potentially Inconsistent.</u> The proposed planting ordinance would potentially be inconsistent with the Paso Robles Subbasin GSP, as discussed in Section 4.8, <i>Hydrology and Water Quality</i> . The County would continue to participate in GSP implementation and support other interregional water planning efforts: encouraging the U.C. Cooperative Extension to continue its public information and research program describing water conservation techniques that may be appropriate for agricultural practices in North County; promoting the use of stormwater capture for groundwater recharge by facilitating a subcommittee of the Water Resources Advisory Committee; implementing the San Luis Obispo County Stormwater Resource Plan; and; and developing an updated Master Water Report.
<b>Economic Element</b>		
Goal EE 1	Promote a strong and viable local economy by pursuing policies that balance economic, environmental, and social needs of the county.	<p><u>Potentially Consistent.</u> The proposed planting ordinance is intended to support agricultural production by allowing farmers to irrigate who are not allowed to by the existing agricultural offset requirements. However, this allowance would result in increased groundwater extraction from an overdrafted groundwater resource, potentially resulting in a reduction in groundwater supplies for existing agricultural producers who share the same groundwater basin. The proposed planting ordinance would also result in other potentially significant environmental impacts, as discussed throughout Section 4, <i>Environmental Impact Analysis</i>.</p> <p>The proposed mitigation measures for the proposed planting ordinance are consistent with part d of Goal AG1, which allows for an increase in the required level of permit processing for non-exempt agricultural activities to protect agricultural resources, sensitive habitats, and groundwater supply. The potentially significant environmental impacts and increase in permitting requirements for agriculture in the PBLUMA that would result from the planting ordinance are consistent with balancing the economic, environmental, and social needs of the county.</p>

Section	Policy	Consistency Discussion
Policy EE 1.3	Balance the capacity for growth with the efficient use or reuse of available resources (energy, land, water, infrastructure) and reasonable acquisition of new resources.	<u>Potentially Consistent.</u> The planting ordinance would allow growth in the PBLUMA agricultural operations. Farmers would be allowed to plant who are not allowed under the existing agricultural offset requirements, using up to 25 AFY water use per site. All other new and expanded plantings would be required to be “water neutral.” The plantings and associated activities resulting from the planting ordinance would result in potentially significant environmental impacts, as discussed in Section 4, <i>Environmental Impact Analysis</i> . Reasonable mitigation has been applied to the extent feasible to reduce impacts, and the planting ordinance is intended to be administered in tandem with ongoing efforts to implement the GSP and improve the water supply resiliency for the PBLUMA.
<b>Land Use Element – Framework for Planning (Inland)</b>		
Strategic Growth Principle 1	Preserve open space, scenic natural beauty and natural resources. Conserve energy resources. Protect agricultural land and resources.	<u>Potentially Consistent.</u> The proposed planting ordinance would facilitate new and expanded agriculture on land designated for agriculture. The new plantings allowed by the proposed planting ordinance would preserve the existing agricultural landscape of the PBLUMA. Agricultural activities facilitated by the proposed planting ordinance would not result in wasteful or unnecessary energy consumption, thus conserving energy resources.
Strategic Growth Principle 1, Policy 1	Maintain and protect a living environment that is safe, healthful and pleasant for all residents.	<u>Potentially Consistent.</u> The proposed planting ordinance would allow new or expanded agricultural activities in areas designated for agriculture, not within urban communities where residential uses typically are more concentrated. The proposed planting ordinance would maintain the agricultural setting of the PBLUMA.
Strategic Growth Principle 1, Policy 2	Keep the amount, location and rate of growth allowed by the Land Use Element within the sustainable capacity of resources, public services and facilities.	<u>Potentially Consistent.</u> The proposed planting ordinance would not alter existing land use designations of the County General Plan and Land Use Ordinance. The planting ordinance would allow new and expanded agricultural operations in the PBLUMA on land designated for agriculture. As discussed in Section 5, <i>Other CEQA Required Discussions</i> , the proposed planting ordinance would not induce substantial direct or indirect population growth, would provide jobs within employment forecasts, and would not remove an existing impediment to growth.
Strategic Growth Principle 1, Policy 3	Preserve and sustain important water resources, watersheds and riparian habitats.	<u>Potentially Inconsistent.</u> See consistency analyses for Goal BR4 and Policy BR 4.1.
Strategic Growth Principle 1, Policy 4	Preserve and protect air quality of the county by seeking to exceed or at least maintain the minimum state and federal ambient air quality standards.	<u>Potentially Inconsistent.</u> See consistency analysis for COSE Policy AQ3 above.

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Strategic Growth Principle 1, Policy 5	Conserve energy resources by: <ol style="list-style-type: none"> <li>a. Planning for energy efficiency and conservation in land use and transportation, and in subdivision and building regulations.</li> <li>b. Decreasing reliance on environmentally costly energy sources, increasing conservation efforts, and encouraging use of alternative energy sources.</li> </ol>	<p><u>Potentially Consistent.</u> It is reasonable to assume that construction activities associated with the proposed planting ordinance would be conducted in a manner to avoid wasteful, inefficient, and unnecessary fuel consumption in order to reduce construction costs. It is also reasonable to assume, in the interest of time and cost, that diesel-powered equipment would not be operated any more than is necessary to maintain and harvest crops, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources. Activities allowed by the proposed planting ordinance would also comply with San Luis Obispo County’s EnergyWise Plan.</p>
Strategic Growth Principle 1, Policy 6	Encourage the protection and use of agricultural land for the production of food, fiber, and other agricultural commodities, and support the rural economy and locally-based commercial agriculture.	<p><u>Potentially Consistent.</u> The proposed planting ordinance is intended to support agricultural production by allowing farmers to irrigate who are not allowed to by the existing agricultural offset requirements (up to 25 AFY water use per site). However, this allowance would result in increased groundwater extraction from an overdrafted groundwater resource, potentially resulting in a reduction in groundwater supplies for existing agricultural producers who share the same groundwater basin. The proposed planting ordinance would preserve agriculture as a primary focus of economic activity within the PBLUMA because competition for limited water resources is an ongoing issue in this region. This ordinance is one strategy to manage agricultural water use, to operate in tandem with other efforts such as GSP implementation and developing recharge projects.</p> <p>The proposed planting ordinance would not change existing mapping or land use criteria for the County’s Agriculture land use category, which already limit agricultural land divisions based on the existing or potential use of the land for cropland and grazing and limit allowable uses to those compatible with agriculture.</p>
Strategic Growth Principle 1, Policy 7	Give highest priority to avoiding significant environmental impacts from development through site and project design. Where such impacts cannot be avoided, minimize them to the maximum extent feasible.	<p><u>Potentially Consistent.</u> The plantings and associated activities resulting from the proposed planting ordinance would result in potentially significant environmental impacts, as discussed in Section 4, <i>Environmental Impact Analysis</i>. Reasonable mitigation has been applied to the extent feasible to reduce impacts.</p>
Strategic Growth Principle 2	Strengthen and direct development toward existing and strategically planned communities.	<p><u>Potentially Consistent.</u> The proposed planting ordinance would not alter existing land use designations of the County General Plan and Land Use Ordinance. The proposed planting ordinance would likely result in new or expanded agricultural activities in areas designated for agriculture rather than within urban communities.</p>
Strategic Growth Principle 2, Policy 1	Maintain rural areas in agriculture, low-intensity recreation, very low-density residential uses, and open space uses that preserve and enhance a well-defined rural character.	<p><u>Potentially Consistent.</u> The proposed planting ordinance would maintain the existing agricultural character within the PBLUMA. The proposed planting ordinance would not alter existing land use designations of the County General Plan and Land Use Ordinance.</p>

Section	Policy	Consistency Discussion
Resource Management System Objective 1	<b>Resource Conservation</b> – To minimize impacts of future development on the long-term availability of essential natural resources, and to identify the limits or "carrying capacities" of those resources by studying the relationship between development impacts and resource capacities.	<u>Potentially Consistent.</u> The main source of water for the PBLUMA is the Paso Robles Groundwater Subbasin, which is certified as Level of Severity III. The proposed planting ordinance would allow growth of agricultural operations within the PBLUMA. Farmers would be allowed to plant who are not allowed under the existing agricultural offset requirements, using up to 25 AFY water use per site without offsetting water use. All other new and expanded plantings would be required to be "water neutral." The plantings and associated activities resulting from the proposed planting ordinance would result in potentially significant environmental impacts, as discussed in Section 4, <i>Environmental Impact Analysis</i> , including increasing groundwater extraction volumes. However, reasonable mitigation has been applied to the extent feasible to reduce impacts. In addition, while the proposed planting ordinance does allow for an increase in groundwater extraction from a currently overdrafted groundwater resource, the long-term viability of this groundwater resource for agricultural use is dependent on other regulatory efforts and infrastructure projects beyond land-use policies (e.g. SGMA).
Resource Management System Objective 4	<b>Agricultural Lands</b> – To encourage protection of production agricultural land, by considering the effects of current and future development on areawide water resources needed for agriculture.	<u>Potentially Consistent.</u> The proposed planting ordinance is intended to support agricultural production by allowing farmers to irrigate who are not allowed to by the existing agricultural offset requirements (up to 25 AFY water use per site). The proposed planting ordinance would result in potentially significant impacts to the groundwater supply in the PBLUMA, which are discussed in Section 4.8, <i>Hydrology and Water Quality</i> and Section 4.13, <i>Utilities and Service Systems (Water Supply)</i> . The proposed planting ordinance is intended to protect water resources in the PBLUMA for agricultural use by maintaining the County's land use authority to regulate new and expanded irrigated crop plantings; however, it does allow for an increase in groundwater extraction from an impacted groundwater resource to allow farmers to irrigate who are not allowed to by the existing agricultural offset requirements. Feasible mitigation has been proposed to reduce impacts as much as possible while meeting project objectives. The long-term viability and resiliency of the Paso Robles Groundwater Subbasin groundwater resource is dependent on other regulatory efforts and infrastructure projects beyond land-use policies (e.g., SGMA).
Resource Management System Level III Action Requirements	If Level [of Severity] III is found to exist, the board shall make formal findings to that effect, citing the basis for the findings, and shall: 1. Institute appropriate measures (including capital programs) to correct the critical resource deficiency, or at least restore Level II so that severe restrictions will be unnecessary. In many cases, other agencies or districts will control decisions about necessary measures. The Board of Supervisors shall only seek cooperative assistance for a certain time period, beyond which measures may be considered to enact	<u>Potentially Inconsistent.</u> The proposed planting ordinance is intended to exercise the County's land use authority to regulate new and expanded irrigated crop plantings to limit the increase in agricultural water demand for a Level of Severity III groundwater basin. The County Board of Supervisors directed the planting ordinance shall terminate in 2045 to be in effect in tandem with ongoing GSP implementation efforts to bring the Paso Robles Groundwater Subbasin into sustainable management by 2040, with a 5-year buffer. However, as discussed in Section 4.13, <i>Utilities and Service Systems</i> , given that the Paso Robles Subbasin is currently identified as LOS III, and that the proposed ordinance would allow extracting additional groundwater from the Paso Robles Subbasin, the ordinance would further increase water demands from a currently overdrafted subbasin. As such, the proposed planting ordinance would be inconsistent with the intent of this action to prevent further resource depletions.

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	<p>county ordinances or standards affecting resource usage such as development restrictions.</p> <p>2. Adopt growth management or other urgency measures to initiate whatever restrictions are necessary to minimize or halt further resource depletion. Any such restrictions shall be reduced or removed only after a public hearing where the Board of Supervisors determines that Level III no longer exists and any dangers to public health or safety have been eliminated.</p> <p>3. A moratorium on land development or other appropriate measures shall be enacted in the area that is affected by the resource problem until such time that the project provides additional resource capacity to support such development.</p>	
<p>Land Use Categories, Goal 3</p>	<p>To support preservation of the county’s agricultural industry and the soils essential to agriculture.</p>	<p><u>Potentially Consistent.</u> See consistency analyses for Goal AG1 and SL3.</p>
<p><b>Land Use Element – North County Area Plan</b></p>		
<p>Goal 2</p>	<p>Agriculture as a primary focus of economic activity, with agricultural land uses maintained and protected. (Applies to the El Pomar-Estrella sub-area).</p>	<p><u>Potentially Consistent.</u> The proposed planting ordinance is intended to support agricultural production by allowing farmers to irrigate cropland who are not allowed to by the existing agricultural offset requirements. The planting ordinance would preserve agriculture as a primary focus of economic activity within the El Pomar-Estrella sub-area because competition for limited water resources is an ongoing issue in this region. This proposed planting ordinance is one strategy to manage agricultural water use, to operate in tandem with other efforts such as GSP implementation and developing recharge projects.</p>
<p>Goal 5</p>	<p>Natural resources that are protected and preserved. (Applies to the El Pomar-Estrella sub-area).</p>	<p><u>Potentially Inconsistent.</u> The ordinance would result in potentially significant impacts to air quality (see Section 4.2, <i>Air Quality</i>); biological resources (see Section 4.3, <i>Biological Resources</i>); cultural, tribal cultural, and paleontological resources (See Section 4.4, <i>Cultural Resources</i>; Section 4.6, <i>Geology and Soils</i>, and Section 4.12, <i>Tribal Cultural Resources</i>); greenhouse gas emissions (See Section 4.7, <i>Greenhouse Gas Emissions</i>); groundwater and groundwater quality (see Section 4.9, <i>Hydrology and Water Quality</i>); and water supply (see Section 4.13, <i>Utilities and Service Systems</i>). Feasible mitigation is proposed where feasible to reduce these impacts as much as possible. However, significant and unavoidable impacts to air quality, groundwater, biological resources, greenhouse gas emissions, and cultural, tribal cultural, and paleontological resources would remain even after implementation of mitigation. Therefore, the proposed planting ordinance would be inconsistent with this goal to protect natural resources.</p>

Section	Policy	Consistency Discussion
Policy 1	Recognize existing development patterns while protecting agricultural use and the area’s historic rural character. (Applies to the El Pomar-Estrella sub-area).	<u>Potentially Consistent.</u> The proposed planting ordinance would regulate new or expanded irrigated crops and would not change existing land use designations in the PBLUMA. The proposed planting ordinance would preserve agricultural land for agricultural use and maintain the PBLUMA’s rural agricultural setting.
Policy 2	Preserve agricultural operations by directing new development toward existing communities and subdivisions and away from agricultural uses, requiring new development to mitigate its impacts on existing agricultural operations, and supporting and maintaining the County Right-to-Farm Ordinance. (Applies to the El Pomar-Estrella sub-area).	<u>Potentially Consistent.</u> See consistency analysis for Strategic Growth Principle 2.
Policy 3	Protect the area near Paso Robles and the airport for agricultural use, and avoid any land use category changes that would diminish its agricultural potential and introduce non-agricultural uses in the area. (Applies to the El Pomar-Estrella sub-area).	<u>Potentially Consistent.</u> See consistency analysis for Strategic Growth Principle 2.
Policy 5	Discourage new land divisions and rezoning that would intensify residential development at or adjacent to land in the Agriculture category (except to house farm workers). (Applies to the El Pomar-Estrella sub-area).	<u>Potentially Consistent.</u> See consistency analysis for Strategic Growth Principle 2.
<b>Land Use Element – Shandon Community Plan</b>		
Policy PEP-3	Support the maintenance and enhancement of agricultural production in the surrounding area.	<u>Potentially Consistent.</u> See consistency analysis for Goal AG1.
Policy NRP-8	Maintain a sustainable water supply by encouraging water conservation, maximizing groundwater replenishment, using recycled water, seeking additional supplemental water, and offsetting new non-agricultural water demand.	<u>Potentially Consistent.</u> See consistency analysis for Policies WR 1.1, WR 1.2, and WR 1.3.
Policy SDP-4	Groundwater recharge shall be a priority in stormwater and drainage system design.	<u>Potentially Consistent.</u> The proposed planting ordinance would not substantially increase impervious surfaces or obstruct natural or artificial groundwater percolation or recharge. Construction of accessory infrastructure associated with the proposed planting ordinance would comply with the Agricultural Order, which requires drainage improvements to manage on-site stormwater runoff.

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Implementation Program NRIP-3	The County should work with the community to maintain viable agricultural land on the periphery of the URL, encourage the continuation of farming activities outside of the URL, and facilitate the continuance of agricultural activities within the community's URL until the land is needed to accommodate population and employment growth.	<u>Potentially Consistent.</u> See consistency analysis for Goals AG1 and AG3.
<b>Land Use Element – San Miguel Community Plan</b>		
Policy 2-4	Support agricultural operations. Support the maintenance and enhancement of agricultural production in the rural areas surrounding San Miguel.	<u>Potentially Consistent.</u> See consistency analysis for Goal AG1.
Policy 7-10	Groundwater recharge shall be a priority in stormwater and drainage system design.	<u>Potentially Consistent.</u> See consistency analysis for Policy SDP-4.
Implementation Program 7-6	Incorporation of low-impact development (LID) techniques and emphasis on groundwater recharge over direct conveyance to surface waters.	<u>Potentially Consistent.</u> See consistency analysis for Policy SDP-4.
<b>Noise Element</b>		
Policy 3.3.5	Noise created by new proposed stationary noise sources or existing stationary noise sources which undergo modifications that may increase noise levels shall be mitigated as follows and shall be the responsibility of the developer of the stationary noise source:  Noise from agricultural operations conducted in accordance with accepted standards and practices is not required to be mitigated.	<u>Potentially Consistent.</u> As discussed in Section 4.10, <i>Noise</i> ), compliance with existing regulations would reduce vibration levels of large agricultural equipment to less than significant so that humans, residences, or historic structures are not substantially affected by vibration.
<b>Safety Element</b>		
Goal S-4	Reduce the threat to life, structures and the environment caused by fire.	<u>Potentially Consistent.</u> Fire hazard severity zones are dependent upon the historical climate, fuel conditions (vegetation), and topography. Depending on the management regime in place, fallowed fields that are bare or contain a low fuel load could provide a buffer between adjacent wildlands and urban development. Thus, the proposed planting ordinance would not increase the risk of wildland fire to existing adjacent urban development and therefore would not expose new development to an increased risk of fire hazard. Irrigated croplands would also serve as a buffer. The overall threat to life, structures and the environment caused by fire would not be increased as a result of the proposed planting ordinance, thus complying with Goal S-4.

Section	Policy	Consistency Discussion
Policy S-13	<p><b>Pre-Fire Management.</b> New development should be carefully located, with special attention given to fuel management in higher fire risk areas. Large, undeveloped areas should be preserved so they can be fuel-managed. New development in fire hazard areas should be configured to minimize the potential for added danger.</p>	<p><u>Potentially Consistent.</u> The proposed planting ordinance would regulate the planting of new and expanded irrigated crops in the PBLUMA consistent with existing land use designations. The proposed planting ordinance would not increase the risk of wildland fire to existing adjacent urban development and therefore would not expose new development to an increased risk of fire hazard.</p>
Policy S-17	<p><b>Fault Information.</b> Information on faults and geologic hazards in the County should continue to be updated. The County will enforce the General Plan and applicable building codes that require developments, structures, and public facilities to address geologic and seismic hazards through the preparation and approval of geotechnical and geologic reports. Appointment of a County Geologist will improve implementation of the goals, policies, programs, and standards of this Element by assuring more objective review and consistent enforcement of hazard mitigation measures county-wide than is possible under the present system of project review.</p>	<p><u>Potentially Consistent.</u> As discussed in Section 4.6, <i>Geology and Soils</i>, construction of accessory facilities or infrastructure associated with the proposed planting ordinance would comply with current design standards and would not exacerbate the potential for seismic activity.</p>
Policy S-18	<p><b>Fault Rupture Hazards.</b> Locate new development away from active and potentially active faults to reduce damage from fault rupture. Fault studies may need to include mapping and exploration beyond project limits to provide a relatively accurate assessment of a fault's activity. The County will enforce applicable regulations of the Alquist-Priolo Earthquake Fault Zoning Act pertaining to fault zones to avoid development on active faults.</p>	<p><u>Potentially Consistent.</u> As discussed in Section 4.6, <i>Geology and Soils</i>, the proposed planting ordinance would regulate new or expanded irrigated crops. Agricultural crop production permitted by the proposed planting ordinance, and construction of accessory infrastructure, would not exacerbate risk of seismic activity or fault rupture.</p>
Policy S-20	<p><b>Liquefaction and Seismic Settlement.</b> The County will require design professionals to evaluate the potential for liquefaction or seismic settlement to impact structures in accordance with the currently adopted Uniform Building Code</p>	<p><u>Potentially Consistent.</u> As discussed in Section 4.6, <i>Geology and Soils</i>, the PBLUMA contains some areas vulnerable to liquefaction, primarily underlying the Salinas River and its tributaries (See Section 4.6, <i>Geology and Soils</i>). Standard best management practices implemented by agricultural operations in the PBLUMA ensure water efficiency and limit overirrigation, thus limiting the likelihood of liquefaction.</p>

County of San Luis Obispo  
**Paso Basin Land Use Management Area (PBLUMA) Planting Ordinance**

Section	Policy	Consistency Discussion
Policy S-27	<b>Pesticide Hazards.</b> Reduce the potential for pesticide exposure to humans and the environment.	<u>Potentially Consistent.</u> As discussed in Section 4.14, <i>Effects Found Not to Be Significant</i> , irrigated crop production often involves the use of pesticides. Increased irrigated crop production associated with the proposed planting ordinance would lead to an increase in the routine transport, use, and disposal of pesticides. Pesticide application is regulated by federal Worker Protection Standards, as well as state-level regulations developed by the California Department of Pesticide Regulation, and implemented by the County of San Luis Obispo’s Agricultural Commissioner’s Office. In addition, the use of hazardous agricultural materials such as pesticides requires a pesticide use permit from the Agricultural Commissioner’s office and is subject to regulations regarding safe storage protocols. Due to state regulations that facilitate the safe transport, use, and disposal of pesticides, impacts related to pesticides would be less than significant.

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