



Referral Early Consultation

Date: January 6, 2026

To: Distribution List (See Attachment A)

From: Marcus Ruddicks, Assistant Planner
Planning and Community Development

Subject: USE PERMIT AND LOT LINE ADJUSTMENT APPLICATION NO. PLN2025-0103 – LAYMAN

Respond By: January 26, 2026

******PLEASE REVIEW REFERRAL PROCESS POLICY******

The Stanislaus County Department of Planning and Community Development is soliciting comments from responsible agencies under the Early Consultation process to determine: a) whether or not the project is subject to CEQA and b) if specific conditions should be placed upon project approval.

Therefore, please contact this office by the response date if you have any comments pertaining to the proposal. Comments made identifying potential impacts should be as specific as possible and should be based on supporting data (e.g., traffic counts, expected pollutant levels, etc.). Your comments should emphasize potential impacts in areas which your agency has expertise and/or jurisdictional responsibilities.

These comments will assist our Department in preparing a staff report to present to the Planning Commission. Those reports will contain our recommendations for approval or denial. They will also contain recommended conditions to be required should the project be approved. Therefore, please list any conditions that you wish to have included for presentation to the Commission as well as any other comments you may have. Please return all comments and/or conditions as soon as possible or no later than the response date referenced above.

Thank you for your cooperation. Please call (209) 525-6330 if you have any questions.

Applicant: Eric Layman

Project Location: 1400 and 1482 St Francis Avenue, between Tully Road and Carver Road, in the Modesto area

APNs: 004-017-028 and 004-017-038

Williamson Act Contract: 1975-1933 (APN 004-017-038)

General Plan: Agriculture

Current Zoning: General Agriculture (A-2-40)

Project Description: Request to construct, operate, and maintain a 2± acre one-megawatt (MW) photovoltaic (PV) solar energy farm on an 11.08± acre parcel in the General Agriculture (A-2-40) zoning district. The site will be remotely monitored, with no full-time employees reporting to the site. No permanent restrooms, offices, or other on-site structures related to the facility are proposed. The facility will be unmanned with a few occasional site visits expected per year for routine maintenance and cleaning. If approved, construction is anticipated to occur within 18 months of project approval. The project will be interconnected with the Modesto Irrigation District (MID) as part of its Feed-in Tariff program. No battery energy storage is proposed at this time.

The Agricultural Element of the Stanislaus County General Plan, specifically Policy 2.5, Implementation Measure Three, encourages the development of alternative energy sources on lands located outside of the County's "Most Productive Agricultural Areas." Until the term "Most

Productive Agricultural Areas" is defined on a county-wide basis, the term will be determined on a case-by-case basis when a proposal is made for the conversion of agricultural land. Factors to be considered include but are not limited to soil types and potential for agricultural production; the availability of irrigation water; ownership and parcelization patterns; uniqueness and flexibility of use; the existence of Williamson Act contracts; existing uses and their contributions to the agricultural sector of the local economy. The applicant indicated that the soil is infected with Armillaria root rot (also known as oak root fungus). This fungus spreads underground through affected soil and gradually cuts off infected trees' abilities to transport water and nutrients, leading to progressive decline and eventual death of infected trees. Even after infected trees are removed, the fungus remains active in buried roots and woody debris, making complete eradication through conventional agricultural practices extremely difficult. The solar array is intended to create a long-term fallow condition that allows the fungus to naturally diminish over the course of the project's proposed 20-year lifespan. At the end of the project's lifespan, all equipment will be removed using shallow extraction methods, allowing the land to be returned to agricultural use without permanent soil disturbance.

The proposed footprint of the PV solar panel is located across both Assessor's Parcel Number (APN) 004-017-028 and 004-017-038. APN 004-017-028 (11.48± acres) is uncontracted while 004-017-038 (9.6± acres) is enrolled under Williamson Act Contract No. 1975-1933. A lot line adjustment is being requested with the subject use permit application to reconfigure and adjust the two project parcels from 9.6± and 11.48± acres to 10± and 11.08± acres. If the proposed lot line adjustment is approved, a rescission of the existing Williamson Act contract will occur, which will allow the proposed solar energy farm to be placed entirely on the resultant 11.08± acre, non-Williamson Act contracted parcel and the adjusted 10± acre parcel to be enrolled into a new Williamson Act Contract.

Full document with attachments available for viewing at:
<http://www.stancounty.com/planning/pl/act-projects.shtm>



USE PERMIT AND LOT LINE ADJUSTMENT APPLICATION NO. PLN2025-0103 – LAYMAN
Attachment A

Distribution List

X	CA DEPT OF CONSERVATION Land Resources		STAN CO ALUC
X	CA DEPT OF FISH & WILDLIFE		STAN CO ANIMAL SERVICES
	CA DEPT OF FORESTRY (CAL FIRE)	X	STAN CO BUILDING PERMITS DIVISION
	CA DEPT OF TRANSPORTATION DIST 10	X	STAN CO CEO
X	CA OPR STATE CLEARINGHOUSE		STAN CO CSA
X	CA RWQCB CENTRAL VALLEY REGION	X	STAN CO DER
	CA STATE LANDS COMMISSION		STAN CO ERC
	CEMETERY DISTRICT	X	STAN CO FARM BUREAU
	CENTRAL VALLEY FLOOD PROTECTION	X	STAN CO HAZARDOUS MATERIALS
X	CITY OF: MODESTO		STAN CO PARKS & RECREATION
	COMMUNITY SERVICES DIST:	X	STAN CO PUBLIC WORKS
	COOPERATIVE EXTENSION	X	STAN CO PUBLIC WORKS - SURVEY
	COUNTY OF:		STAN CO RISK MANAGEMENT
X	DER GROUNDWATER RESOURCES DIVISION	X	STAN CO SHERIFF
X	DISPOSAL DIST: BERTOLOTTI 1	X	STAN CO SUPERVISOR DIST 4: GREWAL
X	FIRE PROTECTION DIST: SALIDA	X	STAN COUNTY COUNSEL
X	GSA: STANISLAUS AND TUOLUMNE RIVERS GROUNDWATER BASIN ASSOCIATION		StanCOG
	HOSPITAL DIST:	X	STANISLAUS FIRE PREVENTION BUREAU
X	IRRIGATION DIST: MODESTO	X	STANISLAUS LAFCO
X	MOSQUITO DIST: EASTSIDE	X	STATE OF CA SWRCB DIVISION OF DRINKING WATER DIST. 10
X	STANISLAUS COUNTY EMERGENCY MEDICAL SERVICES		SURROUNDING LAND OWNERS
	MUNICIPAL ADVISORY COUNCIL:		INTERESTED PARTIES
X	PACIFIC GAS & ELECTRIC	X	TELEPHONE COMPANY: AT&T
X	SAN JOAQUIN VALLEY APCD		TRIBAL CONTACTS (CA Government Code §65352.3)
X	SCHOOL DIST 1: STANISLAUS UNION		US ARMY CORPS OF ENGINEERS
X	SCHOOL DIST 2: MODESTO UNION	X	US FISH & WILDLIFE
X	STAN CO AG COMMISSIONER		US MILITARY (SB 1462) (7 agencies)

STANISLAUS COUNTY CEQA REFERRAL RESPONSE FORM

TO: Stanislaus County Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: _____

SUBJECT: USE PERMIT AND LOT LINE ADJUSTMENT APPLICATION NO. PLN2025-0103 – LAYMAN

Based on this agency's particular field(s) of expertise, it is our position the above described project:

- _____ Will not have a significant effect on the environment.
_____ May have a significant effect on the environment.
_____ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

- 1.
- 2.
- 3.
- 4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

- 1.
- 2.
- 3.
- 4.

In addition, our agency has the following comments (attach additional sheets if necessary).

Response prepared by:

Name	Title	Date
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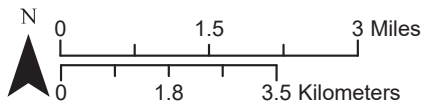
LAYMAN

UP LLA PLN2025-0103

AREA MAP

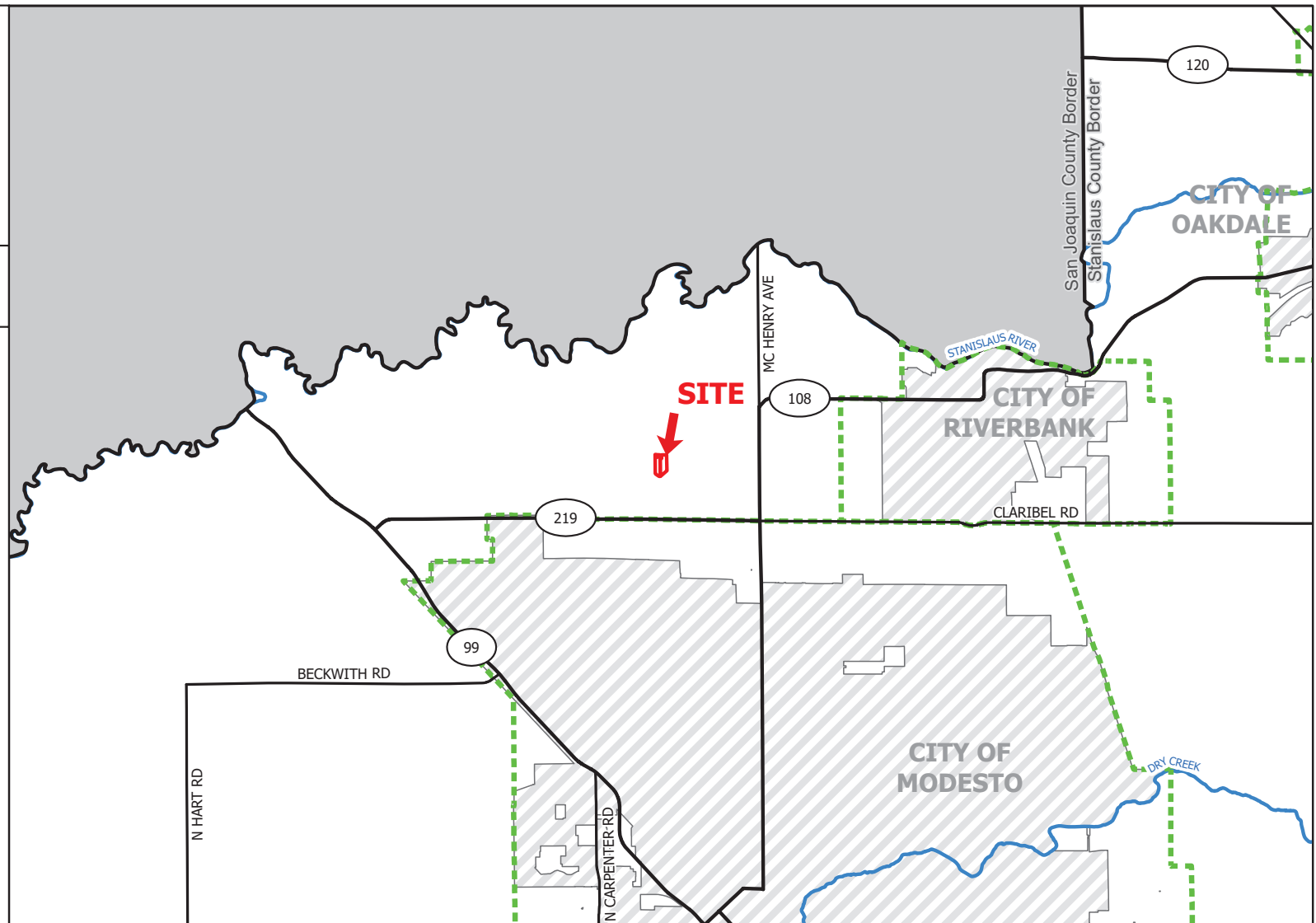
LEGEND

-  Project Site
-  Sphere of Influence
-  Highway
-  Major Road
-  River



Source: Planning Department GIS

Date Exported: 12/4/2025







LAYMAN




UP LLA PLN2025-0103

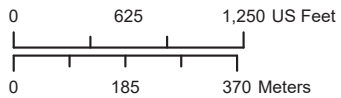
GENERAL PLAN

LEGEND

-  Project Site
-  Parcel
-  Canal
-  Street

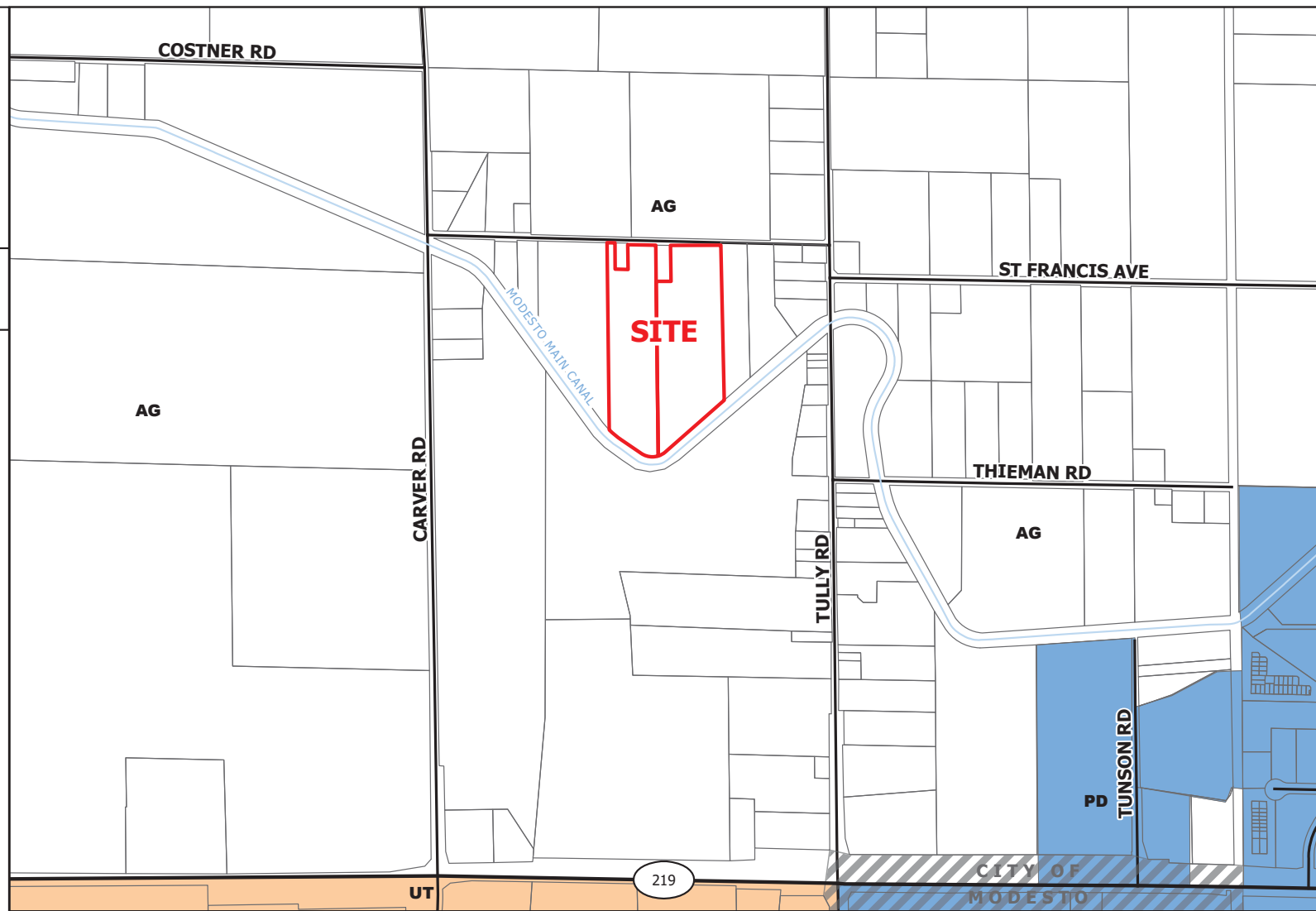
General Plan

-  Agriculture (AG)
-  Planned Development (PD)
-  Urban Transition (UT)



Source: Planning Department GIS

Date Exported: 12/29/2025







LAYMAN




UP LLA
PLN2025-0103

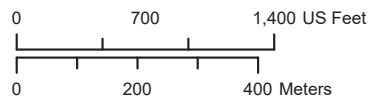
ZONING

LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal

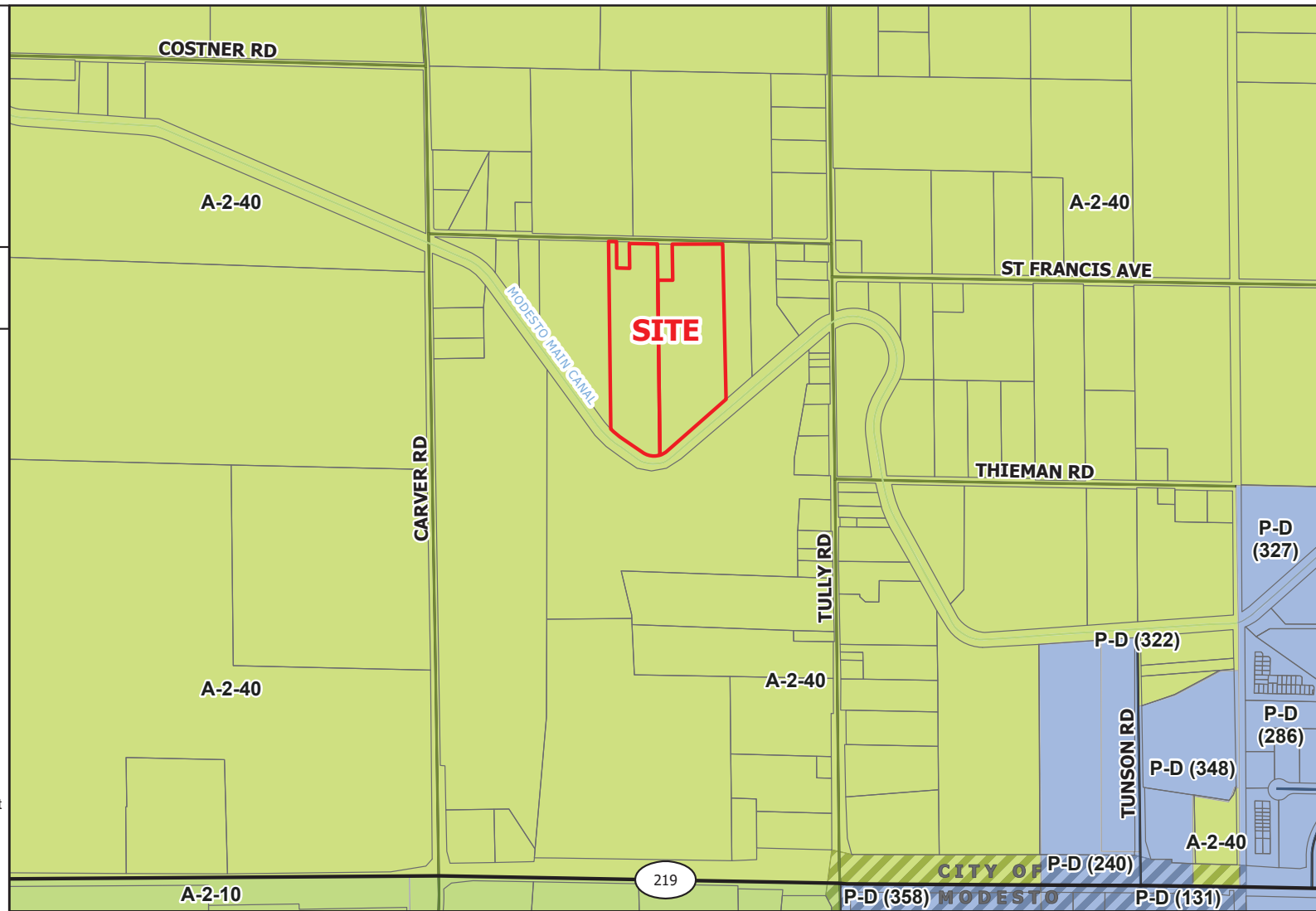
Zoning Designation

-  General AG 10 Acre UT (A-2-10)
-  General AG 40 Acre (A-2-40)
-  Planned Development (P-D)



Source: Planning Department GIS

Date Exported: 12/29/2025



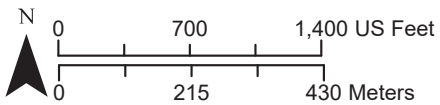
LAYMAN

**UP LLA
PLN2025-0103**

2023 AERIAL AREA MAP

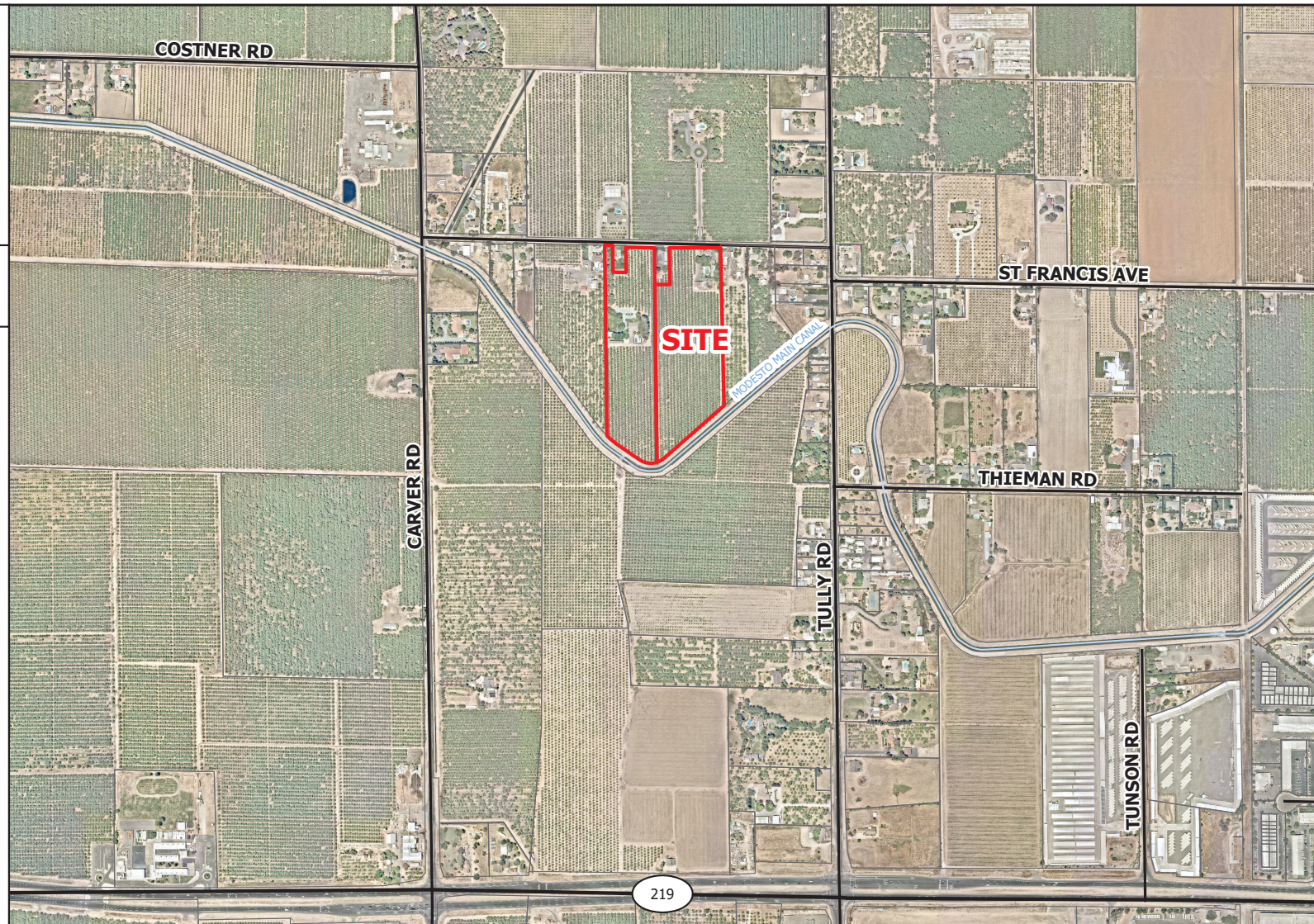
LEGEND

-  Project Site
-  Parcel
-  Highway
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 12/4/2025







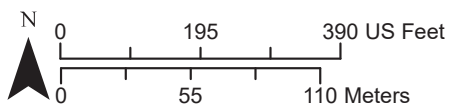
LAYMAN

**UP LLA
PLN2025-0103**

2023 AERIAL SITE MAP

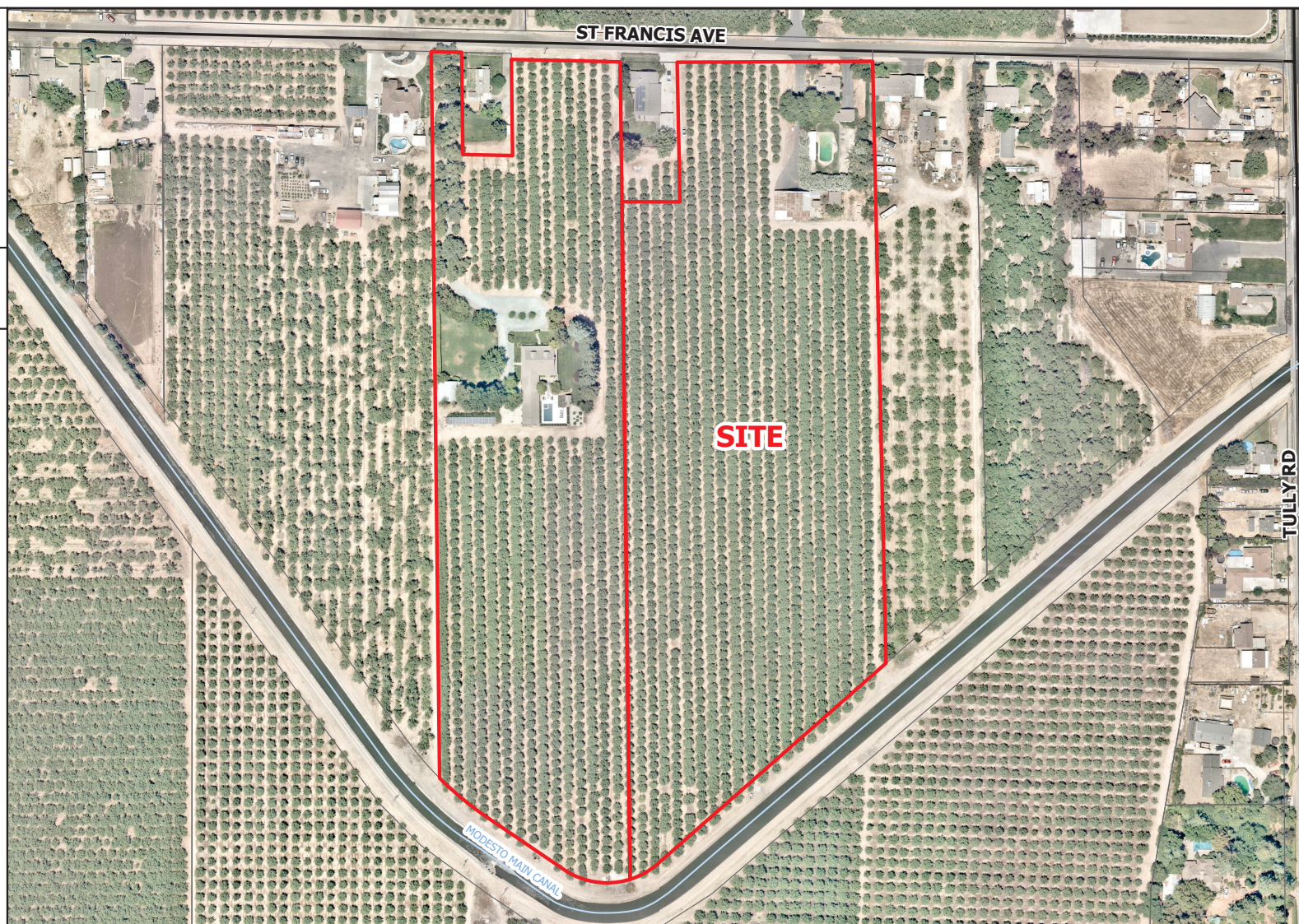
LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 12/4/2025






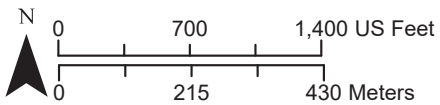
LAYMAN

UP LLA
PLN2025-0103

ACREAGE MAP

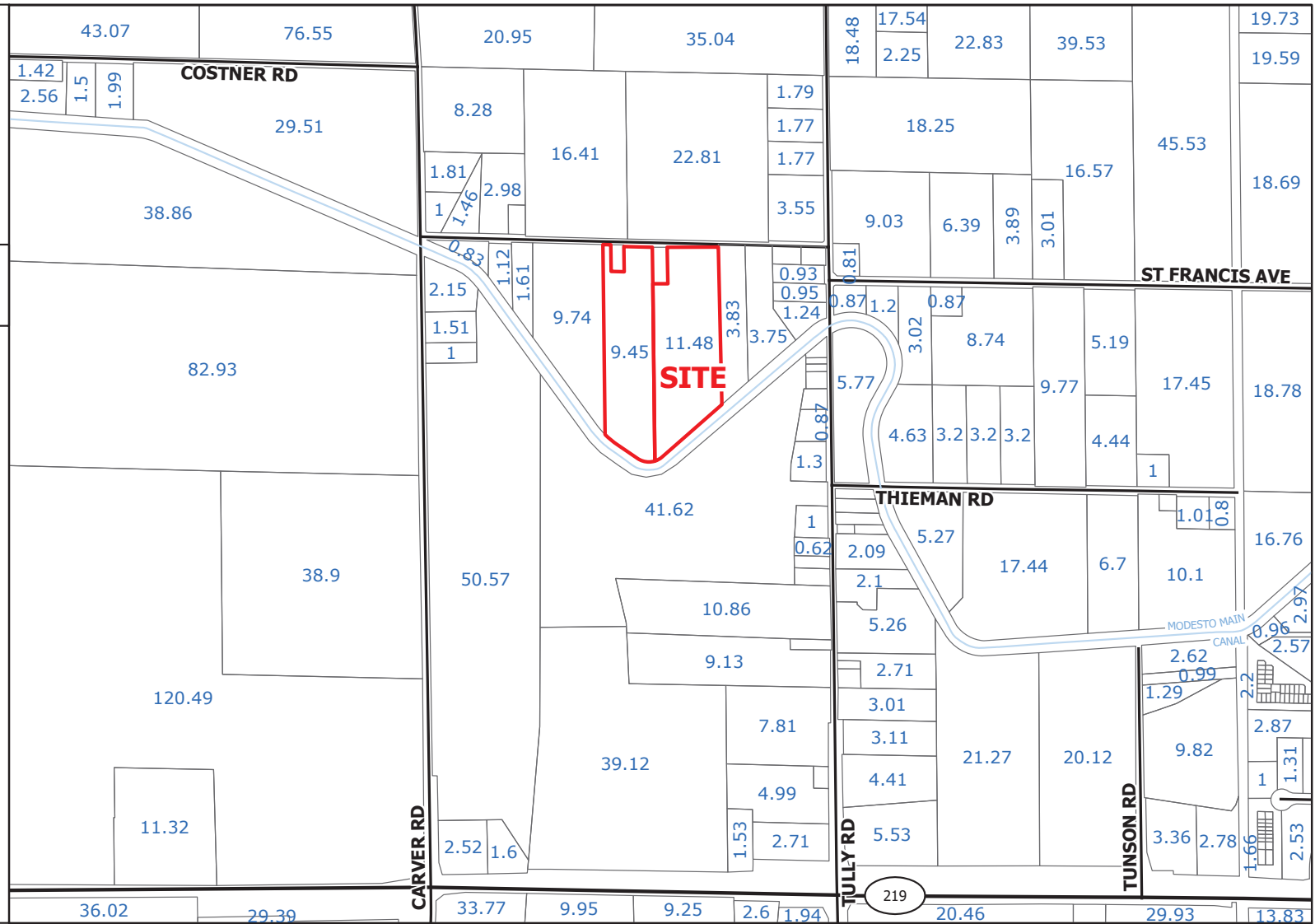
LEGEND

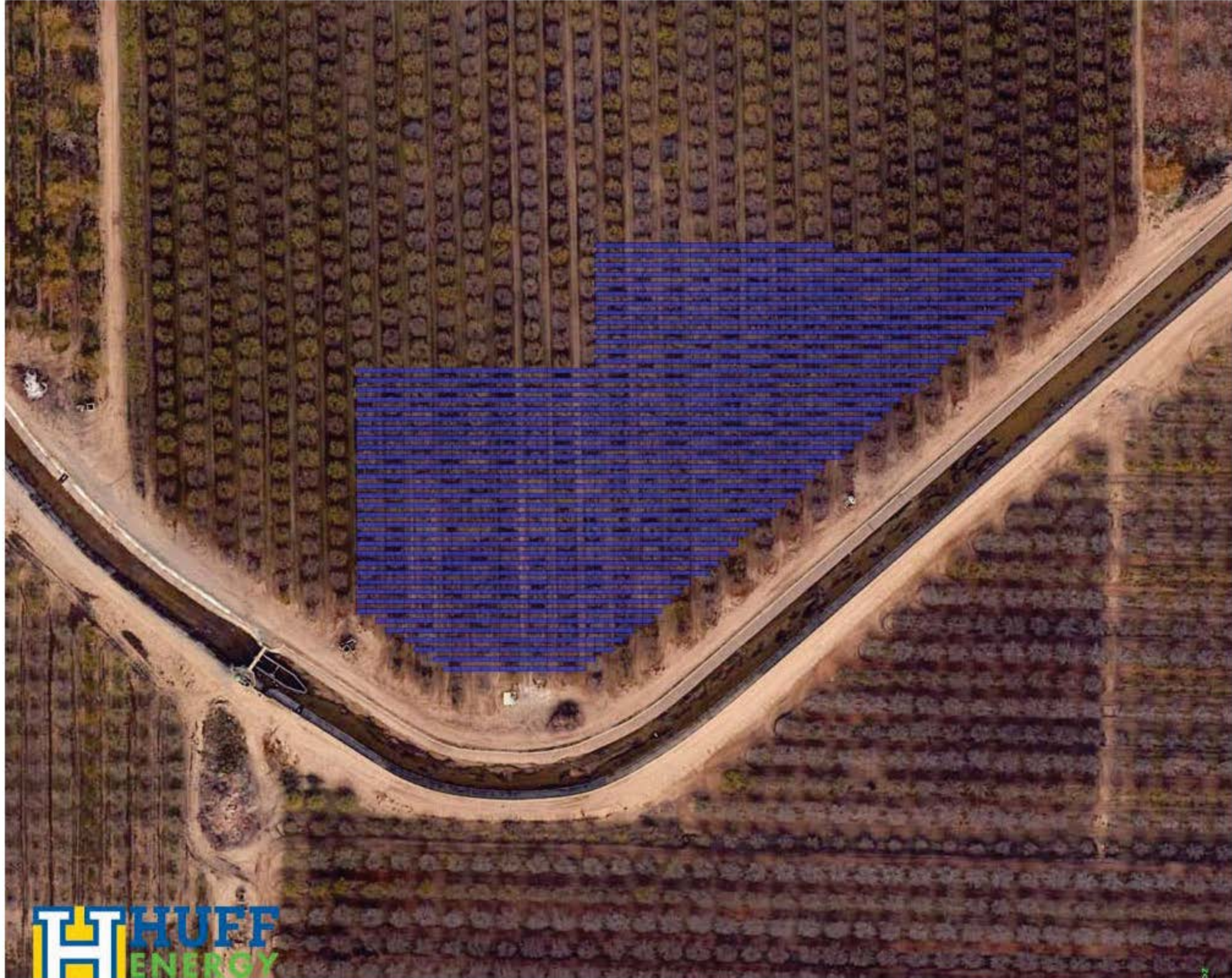
-  Project Site
-  Parcel
-  Highway
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 12/4/2025







DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

1010 10TH Street, Suite 3400, Modesto, CA 95354

Planning Phone: (209) 525-6330 Fax: (209) 525-5911

Building Phone: (209) 525-6557 Fax: (209) 525-7759

Form Available Online: <http://www.stancounty.com/planning/applications.shtm>

APPLICATION QUESTIONNAIRE

Please Check all applicable boxes

APPLICATION FOR:

Staff is available to assist you with determining which applications are necessary

- | | |
|---|--|
| <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Subdivision Map |
| <input type="checkbox"/> Rezone | <input type="checkbox"/> Parcel Map |
| <input checked="" type="checkbox"/> Use Permit | <input type="checkbox"/> Exception |
| <input type="checkbox"/> Variance | <input type="checkbox"/> Williamson Act Cancellation |
| <input type="checkbox"/> Historic Site Permit | <input type="checkbox"/> Other _____ |

PLANNING STAFF USE ONLY:

Application No(s): PLN 2025-0103

Date: 10/20/25

S 31 T 2 R 9

GP Designation: A9

Zoning: IA-2-40

Fee: \$6,749.00

Receipt No. 584996

Received By: ED/MR

Notes: UP w/ ULA

In order for your application to be considered COMPLETE, please answer all applicable questions on the following pages, and provide all applicable information listed on the checklist on pages i – v. Under State law, upon receipt of this application, staff has 30 days to determine if the application is complete. We typically do not take the full 30 days. It may be necessary for you to provide additional information and/or meet with staff to discuss the application. Pre-application meetings are not required, but are highly recommended. An incomplete application will be placed on hold until all the necessary information is provided to the satisfaction of the requesting agency. An application will not be accepted without all the information identified on the checklist.

Please contact staff at (209) 525-6330 to discuss any questions you may have. Staff will attempt to help you in any way we can.

PROJECT INFORMATION

PROJECT DESCRIPTION: (Describe the project in detail, including physical features of the site, proposed improvements, proposed uses or business, operating hours, number of employees, anticipated customers, etc. – Attach additional sheets as necessary)

***Please note:** A detailed project description is essential to the reviewing process of this request. In order to approve a project, the Planning Commission or the Board of Supervisors must decide whether there is enough information available to be able to make very specific statements about the project. These statements are called "Findings". It is your responsibility as an applicant to provide enough information about the proposed project, so that staff can recommend that the Commission or the Board make the required Findings. Specific project Findings are shown on pages 17 – 19 and can be used as a guide for preparing your project description. (If you are applying for a Variance or Exception, please contact staff to discuss special requirements).

install a new ground mount 750 kW PV Solar System

PROJECT SITE INFORMATION

Complete and accurate information saves time and is vital to project review and assessment. Please complete each section entirely. If a question is not applicable to your project, please indicated this to show that each question has been carefully considered. Contact the Planning & Community Development Department Staff, 1010 10th Street – 3rd Floor, (209) 525-6330, if you have any questions. Pre-application meetings are highly recommended.

ASSESSOR'S PARCEL NUMBER(S): Book 004 Page 017 Parcel 038

Additional parcel numbers: 004-017-028

Project Site Address
or Physical Location: _____

Property Area: Acres: _____ or Square feet: _____

Current and Previous Land Use: (Explain existing and previous land use(s) of site for the last ten years)

agriculture

List any known previous projects approved for this site, such as a Use Permit, Parcel Map, etc.: (Please identify project name, type of project, and date of approval)

Existing General Plan & Zoning: _____

Proposed General Plan & Zoning: _____
(if applicable)

ADJACENT LAND USE: (Describe adjacent land uses within 1,320 feet (1/4 mile) and/or two parcels in each direction of the project site)

East: general ag

West: general ag

North: general ag

South: general ag

WILLIAMSON ACT CONTRACT:

Yes ☐ No ☐

Is the property currently under a Williamson Act Contract?

Contract Number: _____

If yes, has a Notice of Non-Renewal been filed?

Date Filed: _____

Yes ☐ No ☐

Do you propose to cancel any portion of the Contract?

Yes ☐ No ☐

Are there any agriculture, conservation, open space or similar easements affecting the use of the project site. (Such easements do not include Williamson Act Contracts)

If yes, please list and provide a recorded copy: _____

SITE CHARACTERISTICS: (Check one or more)

Flat ☒

Rolling ☐

Steep ☐

VEGETATION: What kind of plants are growing on your property? (Check one or more)

Field crops ☐

Orchard ☒

Pasture/Grassland ☐

Scattered trees ☐

Shrubs ☐

Woodland ☐

River/Riparian ☐

Other ☐

Explain Other: _____

Yes ☒ No ☐

Do you plan to remove any trees? (If yes, please show location of trees planned for removal on plot plan and provide information regarding transplanting or replanting.)

GRADING:

Yes ☒ No ☐

Do you plan to do any grading? (If yes, please indicate how many cubic yards and acres to be disturbed. Please show areas to be graded on plot plan.) _____

STREAMS, LAKES, & PONDS:

Yes ☐ No ☒

Are there any streams, lakes, ponds or other watercourses on the property? (If yes, please show on plot plan)

Yes ☐ No ☒

Will the project change any drainage patterns? (If yes, please explain – provide additional sheet if needed) _____

Yes ☐ No ☒

Are there any gullies or areas of soil erosion? (If yes, please show on plot plan)

Yes ☐ No ☒

Do you plan to grade, disturb, or in any way change swales, drainages, ditches, gullies, ponds, low lying areas, seeps, springs, streams, creeks, river banks, or other area on the site that carries or holds water for any amount of time during the year? (If yes, please show areas to be graded on plot plan)

Please note: If the answer above is yes, you may be required to obtain authorization from other agencies such as the Corps of Engineers or California Department of Fish and Game.

STRUCTURES:

- Yes ☒ No ☐ Are there structures on the site? (If yes, please show on plot plan. Show a relationship to property lines and other features of the site.)
- Yes ☐ No ☒ Will structures be moved or demolished? (If yes, indicate on plot plan.)
- Yes ☐ No ☒ Do you plan to build new structures? (If yes, show location and size on plot plan.)
- Yes ☐ No ☒ Are there buildings of possible Historical significance? (If yes, please explain and show location and size on plot plan.) _____

PROJECT SITE COVERAGE:

Existing Building Coverage: _____ Sq. Ft. Landscaped Area: 117249 Sq. Ft.

Proposed Building Coverage: _____ Sq. Ft. Paved Surface Area: _____ Sq. Ft.

BUILDING CHARACTERISTICS:

Size of new structure(s) or building addition(s) in gross sq. ft.: (Provide additional sheets if necessary) _____

Number of floors for each building: _____

Building height in feet (measured from ground to highest point): (Provide additional sheets if necessary) _____

Height of other appurtenances, excluding buildings, measured from ground to highest point (i.e., antennas, mechanical equipment, light poles, etc.): (Provide additional sheets if necessary) _____

Proposed surface material for parking area: (Provide information addressing dust control measures if non-asphalt/concrete material to be used) _____

UTILITIES AND IRRIGATION FACILITIES:

Yes ☒ No ☐ Are there existing public or private utilities on the site? Includes telephone, power, water, etc. (If yes, show location and size on plot plan)

Who provides, or will provide the following services to the property?

Electrical: Modesto Irrigation

Sewer*: Septic

Telephone: AT&T

Gas/Propane: Propane

Water**: Private Well

Irrigation: Modesto Irrigation

***Please Note: A "will serve" letter is required if the sewer service will be provided by City, Sanitary District, Community Services District, etc.**

****Please Note: A "will serve" letter is required if the water source is a City, Irrigation District, Water District, etc., and the water purveyor may be required to provide verification through an Urban Water Management Plan that an adequate water supply exists to service your proposed development.**

Will any special or unique sewage wastes be generated by this development other than that normally associated with resident or employee restrooms? Industrial, chemical, manufacturing, animal wastes? (Please describe:)

Please Note: Should any waste be generated by the proposed project other than that normally associated with a single family residence, it is likely that Waste Discharge Requirements will be required by the Regional Water Quality Control Board. Detailed descriptions of quantities, quality, treatment, and disposal may be required.

Yes ☐ No ☐ Are there existing irrigation, telephone, or power company easements on the property? (If yes, show location and size on plot plan.)

Yes ☐ No ☐ Do the existing utilities, including irrigation facilities, need to be moved? (If yes, show location and size on plot plan.)

Yes ☐ No ☐ Does the project require extension of utilities? (If yes, show location and size on plot plan.)

AFFORDABLE HOUSING/SENIOR:

Yes ☐ No ☒ Will the project include affordable or senior housing provisions? (If yes, please explain)

RESIDENTIAL PROJECTS: (Please complete if applicable – Attach additional sheets if necessary)

Total No. Lots: _____ Total Dwelling Units: _____ Total Acreage: _____

Net Density per Acre: _____ Gross Density per Acre: _____

(complete if applicable)	Single Family	Two Family Duplex	Multi-Family Apartments	Multi-Family Condominium/ Townhouse
Number of Units:	_____	_____	_____	_____
Acreage:	_____	_____	_____	_____

COMMERCIAL, INDUSTRIAL, MANUFACTURING, RETAIL, USE PERMIT, OR OTHER PROJECTS: (Please complete if applicable – Attach additional sheets if necessary)

Square footage of each existing or proposed building(s): _____

Type of use(s): _____

Days and hours of operation: _____

Seasonal operation (i.e., packing shed, huller, etc.) months and hours of operation: _____

Occupancy/capacity of building: _____

Number of employees: (Maximum Shift): _____ (Minimum Shift): _____

Estimated number of daily customers/visitors on site at peak time: _____

Other occupants: _____

Estimated number of truck deliveries/loadings per day: _____

Estimated hours of truck deliveries/loadings per day: _____

Estimated percentage of traffic to be generated by trucks: _____

Estimated number of railroad deliveries/loadings per day: _____

Square footage of:

Office area: _____

Warehouse area: _____

Sales area: _____

Storage area: _____

Loading area: _____

Manufacturing area: _____

Other: (explain type of area) _____

Yes ☐ No ☐

Will the proposed use involve toxic or hazardous materials or waste? (Please explain)

ROAD AND ACCESS INFORMATION:

What County road(s) will provide the project's main access? (Please show all existing and proposed driveways on the plot plan)

Tully Road, Carver Road, St Francis Ave

- Yes ☐ No ☒ Are there private or public road or access easements on the property now? (If yes, show location and size on plot plan)
- Yes ☐ No ☒ Do you require a private road or easement to access the property? (If yes, show location and size on plot plan)
- Yes ☐ No ☒ Do you require security gates and fencing on the access? (If yes, show location and size on plot plan)

Please Note: Parcels that do not front on a County-maintained road or require special access may require approval of an Exception to the Subdivision Ordinance. Please contact staff to determine if an exception is needed and to discuss the necessary Findings.

STORM DRAINAGE:

How will your project handle storm water runoff? (Check one) ☐ Drainage Basin ☐ Direct Discharge ☐ Overland

☒ Other: (please explain) none

If direct discharge is proposed, what specific waterway are you proposing to discharge to? _____

Please Note: If direct discharge is proposed, you will be required to obtain a NPDES permit from the Regional Water Quality Control Board, and must provide evidence that you have contacted them regarding this proposal with your application.

EROSION CONTROL:

If you plan on grading any portion of the site, please provide a description of erosion control measures you propose to implement.

Please note: You may be required to obtain an NPDES Storm Water Permit from the Regional Water Quality Control Board and prepare a Storm Water Pollution Prevention Plan.

ADDITIONAL INFORMATION:

Please use this space to provide any other information you feel is appropriate for the County to consider during review of your application. (Attach extra sheets if necessary)



DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

1010 10TH Street, Suite 3400, Modesto, CA 95354

Planning Phone: (209) 525-6330 Fax: (209) 525-5911

Building Phone: (209) 525-6557 Fax: (209) 525-7759

Form Available Online: www.stancounty.com/planning/applications.shtml

S 31 T 2 R 9
ZONE A-2-40
RECEIVED MRS. ED 10/20/25
APPLICATION NO. PLN2025-0103
RECEIPT NO. 584006

LOT LINE ADJUSTMENT APPLICATION

1. Property Owner(s):

Parcel 1

ERIC LAYMAN

Name

1482 ST. FRANCIS AVE. MODESTO 95356

Site Address, City, Zip

Mailing Address (If different than site address)

Telephone

Fax

Parcel 2

SAME

Name

Site Address, City, Zip

Mailing Address (If different than site address)

Telephone

Fax

Parcel 3

N/A

Name

Site Address, City, Zip

Mailing Address (If different than site address)

Telephone

Fax

Parcel 4

N/A

Name

Site Address, City, Zip

Mailing Address (If different than site address)

Telephone

Fax

2. Name and address of person(s) preparing map: KAISER SHAHBAZ, VVH CONSULTING ENGINEERS

430, TENTH STREET MODESTO 95354

3. Assessor's Parcel No. of parcels adjusted:

Parcel 1: Book 004 Page 017 No. 038

Parcel 2: Book 004 Page 017 No. 028

Parcel 3: Book Page No.

Parcel 4: Book Page No.

4. Size of all adjusted parcels:

Before

After

Parcel 1: 9.60 AC

Parcel 1: 10.00 AC

Parcel 2: 11.48 AC

Parcel 2: 11.08 AC

Parcel 3:

Parcel 3:

Parcel 4:

Parcel 4:

5. Why are the lot lines being changed? BE SPECIFIC FOR SOIL REMEDIATION OF OAK ROOT FUNGUS,

SEE ATTACHED, INSTALL NEW GROUND MOUNT 750 KW PV SOLAR SYSTEM



Statement of Findings
Marcus Ruddicks
Planning and Community Development
11.25.25

The Eric Layman Feed-In-Tariff Solar Project proposes to replace an orchard that has become increasingly unproductive due to the presence of oat root fungus, a condition that makes long-term orchard viability extremely limited on this site. The transition from diseased orchard to a ground-mounted solar array represents a logical and appropriate evolution of land use that remains consistent with the overall goals and policies of the Stanislaus County General Plan. The General Plan encourages the productive use of agricultural land, and in cases where soil-borne pathogens severely diminish crop productivity, renewable-energy production is recognized as a compatible and beneficial alternative. Because the solar facility is a passive, low-intensity use that does not permanently alter the underlying soils, the land retains the potential for future agricultural use should conditions or technologies change.

The project maintains a land-use pattern that fits seamlessly within the surrounding agricultural landscape. The installation does not introduce activity that would conflict with adjacent farming operations, nor does it alter circulation patterns, traffic generation, or the rural character of the area. Solar facilities of this scale generate negligible noise, create no emissions, and involve only infrequent maintenance visits, ensuring that there is no detrimental effect on the health, safety, or general welfare of nearby residents or workers. In fact, the removal of the diseased orchard will reduce the spread of root fungus to neighboring orchards, thereby supporting the agricultural health of the region.

Compatibility with agricultural zoning is further supported by the unique conditions of this parcel. The orchard has experienced steadily declining productivity as a direct result of oat root fungus. In an effort to address this condition, the affected area was replanted in 2019 using rootstock believed to be resistant; however, the disease persisted and the trees again failed to thrive. This unsuccessful replanting effort demonstrates that even disease-resistant varieties cannot overcome the site's soil-borne pathogen load, confirming that long-term orchard production is not feasible. Because the presence of oat root fungus prevents the successful reestablishment of orchard crops and significantly reduces long-term productive potential, the use of the land for renewable-energy generation avoids the repeated soil disturbance, replanting failures, and ongoing agricultural inputs that would otherwise be necessary. The solar use requires no pesticides, fertilizers, or routine heavy-equipment operations, all of which reduces



conflict with nearby agricultural operations. The project is not part of a cluster of non-agricultural uses and does not contribute to an excessive concentration of commercial-type development in an agricultural zone. Instead, it remains a single, isolated renewable-energy facility on a parcel that is otherwise limited in agricultural productivity.

Because solar infrastructure is removable, and because the installation avoids deep grading or soil alteration, the land can reasonably be returned to agricultural use after the end of the system's operational life. This reversibility aligns with the County's intent to preserve the long-term capability of agricultural parcels wherever possible. The project therefore meets the County's criteria that any non-traditional agricultural use in the A-2 zoning district must not compromise the long-term agricultural capability of the parcel and must not interfere with ongoing or future agricultural operations on surrounding lands.

Taken together, the characteristics of the site, the minimal operational impacts of the proposed facility, and the benefits associated with removing diseased orchard crops all support a clear conclusion: the project is consistent with the General Plan, will not be detrimental to public health or safety, will not impair surrounding agricultural uses, and does not create an inappropriate concentration of non-agricultural uses. For these reasons, the Eric Layman Feed-In-Tariff Solar Project satisfies the findings required for approval under Stanislaus County policies and zoning provisions.

Sincerely,

Garrett Ardis

President

Huff Energy Solutions, Inc.