

**DOCKETED**

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<b>Filer:</b>	Jules Tran
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November 1, 2022

California Energy Commission  
Docket Unit, MS-4  
Docket No. 22-IEPR-02  
715 P Street  
Sacramento, California 95814-5512

Re: Comments of the California Farm Bureau Federation on Land Use Screens/Importance of Local Jurisdiction Input

Dear Vice Chair Gunda, Commissioner Vaccaro, and CEC Staff:

The California Farm Bureau Federation appreciates the opportunity to comment on the land use screening process for solar energy that was addressed at the workshop on October 10, 2022. The Farm Bureau is California's largest farm organization, working to protect family farms and ranches on behalf of its nearly 32,000 members statewide and as part of a nationwide network of more than 5.5 million members. Organized over 100 years ago as a voluntary, non-governmental and nonpartisan organization, it advances its mission throughout the state together with its 53 county Farm Bureaus. As a grass roots organization with its foundation reliant on local input, it is important as part of the process for identifying lands suitable for solar that the state's counties approach to land use planning be included in assessments.

Farm Bureau recognizes the detail provided regarding the methods CEC staff used to construct a high-level land-use evaluation in California for electric system planning. Our focus is on the land use evaluation utilized to identify suitable landscapes for solar energy after considering criteria for lands used to produce agricultural crops. According to statistics provided on the California Department of Food and Agriculture website: "California's agricultural abundance includes more than 400 commodities. Over a third of the country's vegetables and three-quarters of the country's fruits and nuts are grown in California. In 2021 California's farms and ranches received \$51.1 billion in cash receipts for their output." At a time when food scarcity is a concern worldwide, California's importance to addressing food needs cannot be undervalued.

In reviewing the documents related to the screening process, a key partner in the analysis related to the suitability nexus between agricultural lands and solar is not referenced – input from local jurisdictions, most importantly Counties. Counties are uniquely positioned to provide input on lands suitable for highly valued crops, lands enrolled in the Williamson Act (The Williamson Act provides property tax incentives to insulate agricultural lands from conversion to other uses. California Gov. Code §§ 51200 et seq.) and lands that face fallowing or retirement.

There are multiple studies and analysis that have reviewed opportunities for siting solar on lands in California. For a number of reasons agricultural lands have always been attractive for large scale solar projects. Agricultural lands provide the undeveloped landscape attractive to solar developers. As California experiences continued pressures from the drought and regulatory directives, such as the Sustainable Groundwater Management Act (SGMA), thoughtful analysis is required to properly weigh how screening for viable croplands is utilized. Local planners must be key partners in weighing and developing the inputs for the screens.

In assessing the value of crops at the local level impacted jurisdictions understand how each product type integrates with economic opportunities and how displacing it with solar would impact the community. It is not just land that is displaced by development, but also labor and supporting businesses that are dependent upon agricultural operations. Although CEC's screening process attempts to draw conclusions about which lands support the "best" crops, local jurisdictions who address community concerns know first-hand how various crop types deliver value.

In counties that support the Williamson Act, lands enrolled in it provide an important indicator of which acreage is not appropriate for inclusion of solar compatibility. At the very least, analysis of which acreage is appropriate for the screening process must acknowledge the constraints of the Williamson Act that place time limits on how acreage is drawn out of the contracts limiting development. The standard Williamson Act contract is for a term of ten years and can be twenty years in a Farmland Security Zone. Restrictions regarding the extrication from the contracts can inform how solar can be built on contracted lands.

Driven by the drought and SGMA, much discussion has arisen regarding agricultural lands that are fallowed in response to those two circumstances. Fallowed lands have been discussed as appropriate for solar facilities. The difficulty in categorizing such acreage is how to predict which lands will be fallowed or retired and no longer able to support agricultural operations. There is no accepted definition currently of acreage that will not support agricultural production for the long term. Farm Bureau recommends that any analysis be informed by local jurisdictions' knowledge about impacted properties. It is important that assessments not be at cross purposes such that lands able to sustain

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production not be prematurely made available for development, since investment in solar facilities is for the long term.

Farm Bureau encourages the input by local jurisdictions in the development of land use screens that impact agricultural property. Until agriculture and solar facilities can coexist side by side, it must be assumed that agricultural land will be permanently removed from production when developed for solar operations. These land use screens can provide important information and understanding about the trade-offs California is making with its resources; the screens for better or for worse are the first step in creating development pressure on identified lands.

Thank you for your consideration.

A handwritten signature in black ink that reads "Karen Norene Mills". The signature is written in a cursive style.

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