



CALIFORNIA FARM BUREAU FEDERATION

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California Energy Commission
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California Energy Commission

DOCKETED
12-IEP-1A

TN # 68741

DEC. 03 2012

Re: Docket No. 12-IEP-1A
Comments of the California Farm Bureau Federation and California Climate &
Agriculture Network on the Draft 2012 IEPR Update

Dear Ms. Bailey:

In accordance with the established schedule the California Farm Bureau Federation¹ and the California Climate & Agriculture Network² ("Agricultural Parties") submit these comments on the Draft 2012 IEPR Update ("IEPR Update"). The primary focus of this submission is on the aspect of the IEPR Update that addresses the identification and prioritizing of geographic areas for renewable projects as part of the strategies for the Renewable Action Plan, as those strategies invoke the Agricultural Parties' interest in minimizing the impacts to the state's productive agricultural resources.

Prior to providing specific comments the Agricultural Parties would like to take

¹ The California Farm Bureau Federation is California's largest farm organization with more than 74,000 agricultural and associate members in 53 county Farm Bureaus. California farmers and ranchers sell \$24.8 billion in agricultural products annually, accounting for 9 percent of the gross state product, and hundreds of thousands of jobs in California. Farm Bureau's members expect to pay in excess of \$850 million for their electric service.

² The California Climate and Agriculture Network is a coalition of sustainable agriculture organizations, working at the nexus of climate change policy and agriculture. Please see: www.calclimateag.org.

the opportunity to recognize the clear, direct presentation of the policy directives and strategies outlined in the IEPR Update for the near term, as it will aid tremendously in actual implementation of reasonable steps toward a balanced framework in the focus on the renewable component of the loading order. Because solar generation has and will continue to be a large factor in renewable generation production, land use impacts must be part of the discussion about how to achieve renewable goals. As of the end of February 2012, in just four Central Valley Counties (Tulare, Kings, Fresno and Kern) approximately 41,000 acres of agricultural land is implicated for proposed solar projects, the vast majority of which is classified as “Important Farmland” (prime farmland, farmland of statewide importance and unique farmland) by the Department of Conservation’s Farmland Mapping and Monitoring Program.

Due to this alarming trend, we strongly support the recommended action identified as part of Strategy 1 of Chapter 5 to: “Collaborate with the Department of Conservation Farmland Mapping and Monitoring Program to identify areas with site characteristics that meet the criteria of Senate Bill 618 (Wolk, Chapter 596, Statutes of 2011) that would be suitable for renewable energy development. “ Identification of lands that are characterized as marginally productive or physically impaired is a crucial element in moving toward balancing the protection of California's agricultural economy and the nation's food security with the need for renewable-energy production—specifically, solar photovoltaic (PV) electrical energy. Such an action is consistent with the need to exclude the state’s most productive agricultural resources, prime farmland, farmland of statewide importance and unique farmland, from development pressures in

helping to ensure our nation's food security.

With the above framework to inform how development of farmland is viewed, we have the following specific recommendations for the IEPR Update document:

1. Page 44, Discussion of Distributed Renewable Energy - Viewpoints about the size parameters for what is considered distributed generation vary greatly. It should be recognized that land use implications for siting distributed renewable generation vary along with the viewpoints about the size. If distributed generation is assumed to be any greater than 5 MW, the concerns over farmland impacts become significant and many of those identified for large scale generation are the same.
2. Page 43, Challenges and Opportunities – The second bullet identifies the importance of the comprehensive planning process, listing identification of key agricultural areas. The sentence should be reworked to make clear that protection and conservation of key agricultural areas is part of the equation in their identification. We suggest the following, “A more comprehensive planning process will help provide effective protection and conservation of sensitive habitats and key agricultural areas as well as potential system upgrade needs, for example, while allowing for the appropriate development of renewable energy projects.”
3. In following on the identification of appropriate areas for development, specific acknowledgement of the retired agricultural lands in Westlands Water District should be identified and included for further efforts toward removing the

barriers with development there rather than productive agricultural lands.

4. Page 63, Description of site characteristics – We recommend against the use of the term “disturbed lands” as it is an overly broad term subject to a wide variety of interpretations. California’s productive farmland is technically disturbed as it is cultivated. Clearly the term “disturbed lands” provides no help in the evaluation and identification of lands that have been compromised in some way. Instead more precision should be used to identify such lands. Terms such as brownfields or chemically or physically impaired lands, as described in SB 618³, convey more accurate characteristics of suitable areas for development and are more precise.

The Agricultural Parties appreciate the opportunity to participate in the Commission’s development of the planning document. The Commission’s recognition of the impact of renewable generation on the state’s farmland is an important step in balancing the interest of maintaining the nation’s food security while meeting the state’s renewable goals.

Respectfully submitted,



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³ See: http://www.leginfo.ca.gov/pub/11-12/bill/sen/sb_0601-0650/sb_618_bill_20111008_chaptered.html.