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California Energy Commission

**DOCKETED**  
**12-GREP-1**

TN # 69029

JAN. 04 2013

Re: Docket No. 12-GREP-1  
**Comments of the California Farm Bureau Federation on the Renewable  
Energy Planning Grants**

Dear Mr. Harland:

The California Farm Bureau Federation ("Farm Bureau")<sup>1</sup> appreciates the opportunity to comment on the development of the grant solicitation for certain counties to facilitate careful planning of renewable energy resources. Farm Bureau has a keen interest in the planning for renewable energy resources because land use impacts on productive agricultural lands from the development is an important part of the discussion about reaching renewable energy goals. That solar development has eroded the inventory of available farmland in the state cannot be denied. 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,

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<sup>1</sup> 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.

NANCY N. McDONOUGH, GENERAL COUNSEL

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farmland of statewide importance and unique farmland) by the Department of Conservation's Farmland Mapping and Monitoring Program. We encourage procedures that consider both greater critical analysis about the type of land utilized for renewable energy development and a broader array of renewable generation types. The focus of these comments will be on issues that are evoked by question number 8.

Pursuant to Public Resources Code section 25619 (a), fifteen counties qualify for the planning grants. Of those fifteen counties identified, eight are included in the top ten California counties for agricultural production value.<sup>2</sup> The three top counties, Fresno, Tulare and Kern, each report value of agricultural production in excess of \$6 billion. With the subject counties' ability to provide the necessary resources for highly valued food and fiber production, continued efforts to minimize the impact to Important Farmland is and should be an important focus of any planning discussions where productive agricultural resources are affected.

The Commission need only look at some of its other recent proceedings where similar planning efforts have been considered for guidance. In its Application for Approval of Electric Program Investment Charge Proposed 2012 Through 2014 Triennial Investment Plan, the discussion about the type of planning effort under consideration here is on point: "The Energy Commission will give preference to applicants who demonstrate innovative strategies to achieve land conservation such as

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<sup>2</sup> California County Agricultural Commissioners' Reports 2011, page 2. The 8 counties are Fresno, Tulare, Kern, Merced, Stanislaus, San Joaquin, Kings and Imperial.

preserving productive farmland and protecting land with high biological value.”<sup>3</sup> One pathway to preserving productive farmland is facilitation of the identification of marginally productive or physically impaired land for which criteria was established in Senate Bill 618 (Wolk, Chapter 596, Statutes of 2011) and which generally considers soil conditions, water availability and crop yield information.

The approach discussed above would also be consistent with action identified in the Draft 2012 IEPR Update that supports collaboration with the Department of Conservation Farmland Mapping and Monitoring Program to identify areas with site characteristics that meet the criteria of SB 618.<sup>4</sup> That other forms of renewable energy are available to the counties which will ultimately be eligible for grants should also not be overlooked. The Commission should reward those who are seeking ways to explore opportunities in addition to solar projects. Facilitating a broad range of projects will provide a diversity of resource mix as well as minimize the land use impacts. Digester and biomass projects are also of keen interest to many of the counties under consideration and can provide benefits to a variety of local and statewide concerns.

Thank you for the opportunity to comment.

Respectfully submitted,



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<sup>3</sup> Page 171.

<sup>4</sup> Strategy 1 of Chapter 5.