

The logo for the Imperial County Farm Bureau. It features a stylized 'F' and 'B' intertwined, with a leaf inside the 'B'. To the right of this icon, the words 'Imperial County' are stacked above 'Farm', which is above 'Bureau'.

Imperial County Farm Bureau

February 19, 2015

California Energy Commission
DOCKETED
09-RENEW EO-1
TN 74766
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California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

To Whom It May Concern:

The Imperial County Farm Bureau (ICFB) is a private, non-profit advocacy organization that serves approximately 800 members; primarily farmers, ranchers, landowners and farm services providers in the Imperial Valley. We appreciate the opportunity to comment on the Desert Renewable Energy Conservation Plan (DRECP).

After reviewing your draft EIR/EIS plan and attached maps, it is clear that you consider the entire Imperial County agricultural lands and prime areas for solar development.

Imperial County's economy is based on agriculture. It is one of the most productive agricultural counties in the nation. Nearly every dollar spent in our valley is tied to agriculture in some way. We are disturbed by the lack of consideration to our vast agricultural production that is essential to our nation's food supply.

We feed the nation with the abundance of food we produce using water that is backed by over a hundred years of senior water rights. We are concerned that increased acreages of solar installations will lead to a deterioration of our water rights as less acres are farmed. We fear that people lacking water along the coast, that have better political representation due to their sheer numbers, will peck away at our secure water rights in an effort to glean more from us.

Already nearly 10,000 acres have been taken out of production for at least 30 years and solar equipment installed with devastating effects to the local economy. Another 10,000 additional acres are in the process of developed. As a result, land rents have and will continue to go up drastically. The lack of available farmland will further harm our agricultural economy.

Our main objection to your draft plan is taking viable agricultural land out of production to install solar projects when there is plenty of land around our agricultural area that is well suited for solar installations. One of your maps shows over 61% of the acreage in Imperial Valley is Federal Land while 39% is non-federal land. Of the total 2,775,000 acres in Imperial County 450,000 acres are farmed. We have already given up a considerable amount of productive farmland for solar installations. It is time this plan looks at how the non-income producing Federal land can be used for solar installations.

After 50 years of geothermal renewable energy in Imperial Valley, we have found that geothermal installations and agricultural fields work fine together because they take up less acreage and crops can easily be grown around the various geothermal wells. We do not object to those types of renewable energy installations.

Recent solar installations have confounded farmers who are forced to farm around them, especially during the construction phase. Large blocks of fenced areas make travel with farm equipment very difficult. We have seen drainage ditches dry up near solar installations because that ground is no longer farmed and heavy growths of noxious weeds have taken over in the seldom used drainage ditches, creating higher costs to maintain these drains. Aerial applicators are facing a large increase of very dangerous power lines making it more treacherous to apply pesticides to our field.

The Coachella, Imperial and Mexicali Valleys play host to the largest populations of birds in the United States. Over 400 species have been recorded here, more than anywhere else in the United States. The reason for this is the massive acreage of irrigated farmland made up over 100 types of growing agricultural products that produce a myriad of insects and edible vegetation that migrating birds use yearly for food, habitat, and resting areas during their stay. Imperial Valley continues to be a bright spot in the Pacific Flyway as urban sprawl erodes more of the habitat historically used by birds. If the acreage of solar installations increase it will devastate an already weak Pacific Flyway.

The burrowing owl is an excellent case in point. Imperial Valley now contains 70% of California's population of this specie of concern and the numbers remain constant and some years even increase because the amount of food and habitat is bountiful. That is not the case around the recent solar installations.

In closing, we want you to fully understand that what you are proposing for Imperial Valley, already a socioeconomically devastated area, is shocking, unsuitable, inconceivable, and will ravage one of the most productive agricultural areas in the United States. Your milk, broccoli, lettuce, cheese for your pizza and spaghetti doesn't originate at the store, it first comes from Imperial Valley and the Imperial County Farm Bureau is against taking any more acres out of agricultural production to meet the renewable energy projects for the future.

Thank you in advance for your consideration.



Larry Cox
President
Imperial County Farm Bureau