



# CALIFORNIA FARM BUREAU FEDERATION

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January 11, 2013

Mr. Patrick Young  
California Public Utilities Commission  
550 Van Ness Avenue  
San Francisco, Ca

**Re: Comments on TPP Renewable Portfolios**

Dear Mr. Young:

In accordance with the established schedule for submission of comments, the California Farm Bureau Federation (“Farm Bureau”) provides these comments regarding information that was presented at the Joint California Energy Commission and California Public Utilities Commission staff Workshop on Renewable Resource Portfolios for the California ISO Transmission Planning Process. Specifically, Farm Bureau would like to provide input and additional information for consideration of agricultural resources regarding the Environmental Scoring Matrix that was presented and is used by the CPUC and CEC to evaluate energy projects. Careful consideration about siting projects on agricultural resources is an important step in balancing the interest of maintaining the nation’s food security while meeting the state’s renewable energy goals. Such consideration is of particular importance for assessment of solar projects and transmission projects, which can both impact significant land resources.

The Scoring Matrix references agricultural land in two places. One reference is to “abandoned agricultural lands”, for which a definition was not readily ascertainable.

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In keeping with the criteria of Senate Bill 618 (Wolk, Chapter 596, Statutes of 2011), Farm Bureau supports identification of lands that are characterized as marginally productive or physically impaired in order to balance the protection of California's agricultural economy and the nation's food security with the need for renewable energy production. The need to exclude from development the state's most productive agricultural resources defined as prime farmland, farmland of statewide importance and unique farmland, suggests a different score than the neutral "50" currently assigned to productive agricultural lands. In addition, farmlands under contract pursuant to the California Land Conservation Act of 1965 (popularly known as the Williamson Act) should also be scored in a manner that better reflects the importance placed on preserving those farmlands.

As discussions have evolved over the last few years about how to balance development that supports renewable energy goals with other land use priorities, better information and guidance has developed. The criteria of SB 618 has elicited further information about how to fine-tune identification of lands better suited for development and should be considered. The opportunity to comment on the matter is appreciated.

Respectfully submitted,



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