



# CALIFORNIA FARM BUREAU FEDERATION

OFFICE OF THE GENERAL COUNSEL

2300 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833-3293 · PHONE (916) 561-5650 FAX (916) 561-5669

RECEIVED  
FEB 25 2008

February 21, 2008

Jeffrey Byron  
Commissioner  
California Energy Commission  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512

Jim Pope  
General Manager  
Northern California Power Agency  
180 Cirby Way  
Roseville, CA 95678-6420

Dian Grueneich  
Commissioner  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 95102

Bill Carnahan  
Executive Director  
Southern California Public Power Authority  
225 South Lake Avenue, Suite 1250  
Pasadena, CA 91101

Yakout Mansour  
President and Chief Executive Officer  
California Independent System Operator  
151 Blue Ravine Road  
Folsom, CA 95630

Jim Shelter  
Assistant General Manager  
Sacramento Municipal Utility District  
6201 S Street  
Sacramento, CA 95817

RE: RETI Procedures and Scope

Dear RETI Coordinating Committee Member:

The California Farm Bureau Federation ("Farm Bureau") represents the interests of farm and ranch families throughout the state, assisting them in their ability to utilize California resources to produce food and fiber in the most profitable, efficient and responsible manner possible. Key to the ability of farmers and ranchers to sustain effective productivity is the viability of land resources used in their operations. Existing transmission lines and future transmission lines can have a significantly detrimental impact on agricultural operations. The RETI effort is one of several transmission planning undertakings that Farm Bureau has taken a keen interest in, because of implications to these land-based businesses.

Enclosed for your information are two maps, which highlight the concerns faced by farming and ranching families, as the maps show the land use constraints for placement of transmission lines throughout the state. Together they demonstrate the vulnerability of California's most productive farmland to development. The first titled "Land Ownership in California" depicts the vulnerability of private land in California to infrastructure improvements, such as transmission lines, because of limitations from placement in urban areas and the impediments of federal lands. The other map, titled "Farming on the Edge" in many ways matches up with the first map. Encroachment due

NANCY N. MCDONOUGH, GENERAL COUNSEL

ASSOCIATE COUNSEL:

CARL G. BORDEN · KAREN NORENE MILLS · RONALD LIEBERT

to housing developments is not the singular source of pressures that place farms and ranches at risk. Unskillful approaches to infrastructure planning, such as transmission siting, can create the same pressures. As the RETI process recognizes, there are multiple builders of transmission lines, as well as multiple jurisdictions overseeing the siting process. It would be quite positive, if the RETI process spawned cooperation among the various entities, and thus reduced the impact on the state's resources.

Although not opposed to the construction of transmission lines in the state, Farm Bureau is working to increase the awareness of the valuable resources provided to the state from productive agriculture, which must not be taken for granted in planning efforts such as RETI. The value of agricultural resources to the state is recognized in many contexts, including the necessity to consider agricultural resources as part of CEQA review.

In trying to measure the ongoing challenges agricultural operators face with the onslaught of transmission proposals, the impacts of the RETI process have been difficult to assess. The recently posted document to the RETI website "Frequently Asked Questions," was helpful in better assessing those impacts and how or when input in the process will be appropriate. Of particular interest was the clarification that the process is divided into phases, with the development of transmission plans targeted in phases 2 and 3. It is on that portion of the RETI process that Farm Bureau will focus its attention. We will, nevertheless, continue to monitor the process and attend the Plenary Stakeholder Group meetings during phase 1.

Once the phase 2 process is commenced, Farm Bureau requests it or another private property owner representative be included in the Stakeholder Steering Committee. Identification of major transmission projects with recommendations to decision-makers for approval will impact landowners in the areas for which the projects are targeted, just as it was acknowledged the identification of transmission corridors would in the CEC planning process (SB 1059). The current membership of the Stakeholder Steering Committee, although an impressive cross-section of the industry, includes no member who would be expected to bring forward the concerns of how this broad planning process may encroach on property rights. With the emphasis the RETI process has placed on transparency and reaching an understanding of potential objections, a process for input by all interested parties must be facilitated.

Thank you for your consideration.

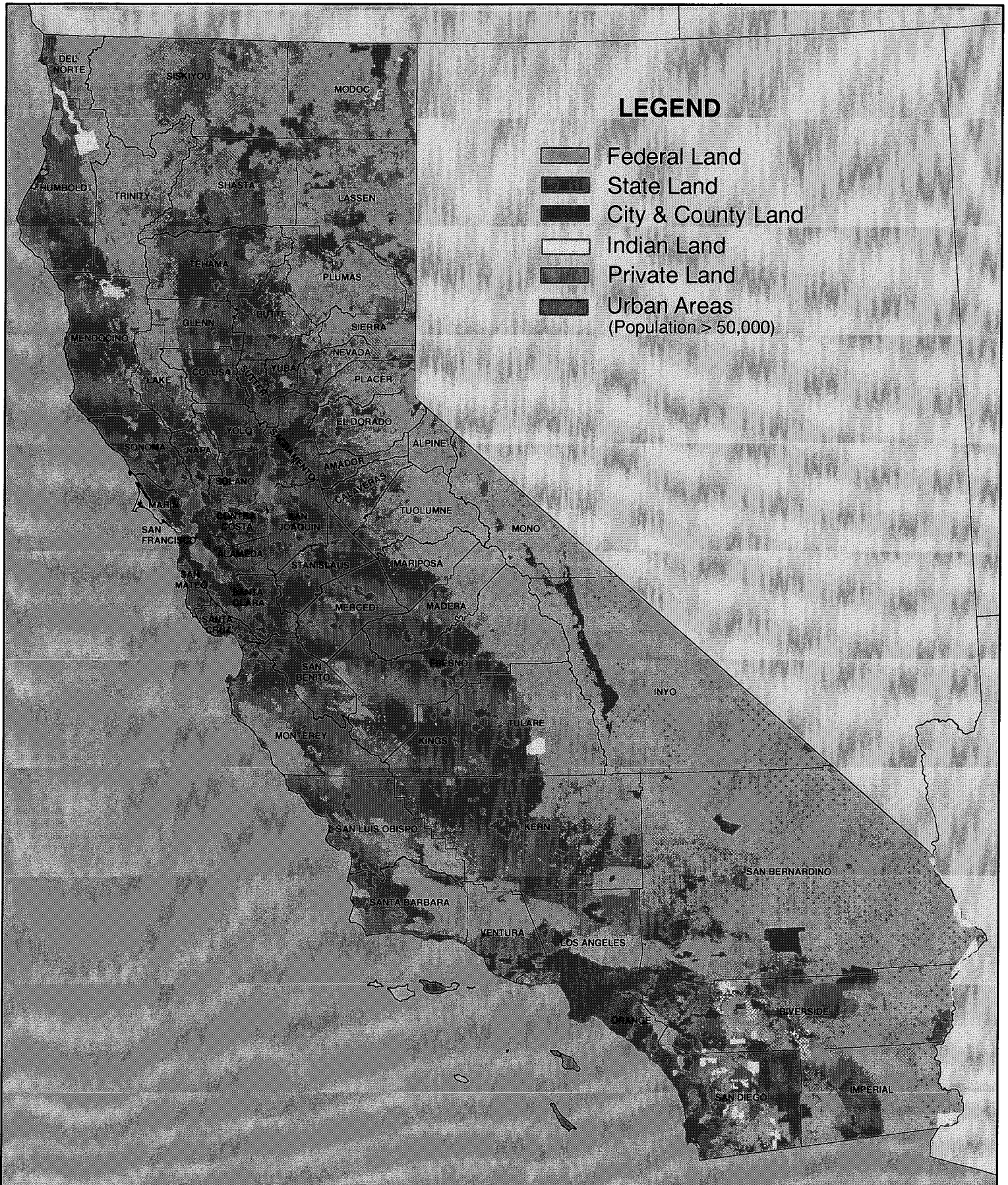
Very truly yours,



KAREN NORENE MILLS

cc David Olsen  
Richard Ferguson, Ph.D.  
Traci Bone, California Public Utilities Commission  
Robin Smutny-Jones, California ISO

# LAND OWNERSHIP IN CALIFORNIA



This map illustrates the distribution of land ownership in California (2005). The information presented in this map was obtained from the California Spatial Information Library, the National Atlas (USGS), and the U.S. Census Bureau (2000 census). This map is intended for informational use only. The data is based on the best available information and may not be complete. The most recent and extensive information was used; however, that does not guarantee its accuracy. California Farm Bureau Federation will not be liable under any circumstances for any damages with respect to any claim by the user or any third party on account of or arising from the use of this map or data. This map was created by and for the exclusive use of the California Farm Bureau Federation. February 2008.



