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September 5, 2023

Yolo County Board of Supervisors
625 Court Street
Woodland, CA 95695

RE: Opposition to Gibson Solar Project

Dear Members of the Board of Supervisors:

Thank you for the opportunity to provide comments on the Gibson Solar Farm Project. Yolo County Farm Bureau (YCFB) issued a letter of opposition to the Martinez Ranch solar project in August 2011. The concerns expressed in the letter remain the same.

YCFB supports the development of solar installations of appropriate size (geared to providing energy for the farm involved in whole or in part) on prime agricultural soils.

This proposed project is on production agricultural land and is surrounded by agricultural properties, including orchards. The project is proposed to be built on prime farmland which covered under a Williamson Act contract. It is not designed to provide any or all of its output to the farm on which is it located. Rather, the power is to be sold to Valley Clean Energy, (including the charging of batteries).

When completed the project will require employees to perform maintenance, repairs, equipment replacement and to wash the solar panels. This is an industrial use in an agricultural area. These activities directly impact neighboring agriculture and cannot be mitigated. Farming neighbors will have their appropriate, timely and essential agricultural activity on their parcels limited or curtailed because of the incompatible industrial use of this facility.

The best illustration of this is the buffer requirements for aerial spraying. Pesticides applied by fixed wing aircraft or helicopters require a 500 foot buffer from neighboring parcels. There are situations when the only way to get a timely pesticide applied on a crop is to put it on by air. This project could hamper or preclude a timely application due to employees working at the industrial solar installation. Essentially, the existence of the project forces the neighboring farmers to abandon the option of aerial pesticide application. Additionally, it will also potentially preclude application of ground sprays on the crop within that buffer zone. The neighboring farmers will receive no compensation for the impairment of their ability to protect their crops, nor will they receive compensation for potential losses due to pest damage.

There is the additional possibility that the owners of this project, or others, if it is approved, would attempt to curtail the necessary and agriculturally appropriate activities of the neighboring farmers due to perceived negative impacts of spray on their solar panels.

The second best illustration is that farming activities include raising dust, which will spread from the neighboring farmland onto the solar panels, especially during the harvest season.

It is the strong belief of the YCFB directors that projects which inject an essentially industrial use into an agricultural area should be denied unless the project itself includes enough land to completely buffer neighboring agricultural activity. Without a buffer on the project ground itself, there will be unnecessary industrial/rural interface issues which cannot be successfully resolved. The buffers which are discussed in the project application are clearly insufficient to protect neighboring agriculture.

Another overarching concern is the forethought into such an endeavor by the County. There are a lot of undeveloped, uncultivated acres in the county that could be put to better use with solar panels. One argument against this is the solar panels would be located further from the infrastructure grid or sub stations and therefore less feasible. However, it is worth noting that the existing infrastructure is aging and will need to be improved/updated or replaced to maintain the existing grid and support the new electricity.

This warrants the idea the County should carefully look at opportunities to consider a comprehensive project that would relocate existing technology and that would handle larger development of solar arrays for the future on uncultivated farmland. Otherwise, developing this one production agriculture parcel will set a precedent and lead to more applications to develop solar facilities on production agricultural parcels. When development of agriculture parcels happens vary rarely is the land ever returned to the same productive ag land it once was.

Changing agricultural lands to industrial use is happening throughout the state due to an unreliable irrigation water supply. Yolo County is currently working to implement a Climate Action Plan to promote a robust agricultural industry. If the County is truly serious a number one priority needs to be addressing the need for more surface water storage, which will in turn benefit the groundwater recharge. With more reliable irrigation water for farming crops, there will be an increase in the number of farmed acres which will provide more jobs, support the environment, sequester carbon, introduce water back into aquifers and reduce flood control risks around the county. This will have a much more beneficial impact to the county than a solar array.

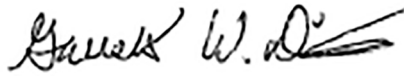
The last point is it would seem that Valley Clean Energy's interests may be better suited by placing solar panels on more homes and buildings across the cities and rural areas of the county. This is where the power is intended to be used today. If there is a desire to develop a solar field, what considerations have

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been made for the encouragement of homeowners to put panels on their roofs and provide more electricity for themselves and grid. We suggest the County determine how many acres of roof tops are not hosting solar panels and how that compares to the land being proposed for development.

For the above reasons the Yolo County Farm Bureau opposes issuance of a conditional use permit for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Garrett W. Driver". The signature is written in a cursive style with a long horizontal stroke at the end.

Garrett Driver
President