

ATTACHMENT I

Gibson Solar Farm Project Farm Bureau Concerns Letter Response

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 it is located. Rather, the power is to be sold to Valley Clean Energy, (including the charging of batteries).

[GSF Response: While the offtake and ancillary services are contracted to VCE, on a physical level, energy flows where it is needed, i.e., to load or electric demand.](#)

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.

[GSF Response: Project proponent will voluntarily address this concern raised by the Farm Bureau via the implementation of the COA #18 as detailed in the project Conditions of Approval.](#)

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.

GSF Response: Per guidance released by the Ag Commissioner, this 500ft buffer only applies to environmentally sensitive sites, of which solar energy facilities are not considered such. When the project proponent is aware, to the best of their ability, that the project will be occupied by humans, they will voluntarily communicate and coordinate with agricultural operators to minimize disruptions to the greatest extent. The project also already incorporates 50ft setbacks where required by the Yolo County zoning ordinance.

Additionally, the project proponent has partnered with UCD for research at this site, and one of the potential research opportunities that could be employed might be planting hedgerows to study their impact on pesticide drift. IF the project proponent should opt to plant hedgerows in conjunction with UCD research, we would work with NRCS to ensure that any hedgerow plantings would be of a species that do not attract typical ag pests.

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.

GSF Response: Project proponent has accounted for dust raised by ag activities in the project solar energy production estimates, and would time module washings and maintenance to minimize this impact to the greatest extent while ensuring active coordination with surrounding ag operators in accordance with COA #18.

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.

GSF Response: As noted above, the project design already incorporates a 50ft buffer as required by the YC Zoning ordinance, and additionally, per guidance released by the Ag Commissioner, the aforementioned 500ft buffer only applies to environmentally sensitive sites, of which solar energy facilities are not considered such.

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.

GSF Response: Electrical infrastructure associated with utilities, such as substations, transmission, and distribution lines, do not typically fall under local County and/or City purview unless the jurisdiction has a municipal utility incorporated into their public services. In Yolo County, utility infrastructure is owned by Pacific Gas & Electric (PG&E), of which any upgrades and/or maintenance fall solely to PG&E and are regulated by the CA Public Utilities Commission (CPUC) and/or the California Energy Commission (CEC), not Yolo County. Bearing that in mind, the relocation and realignment of existing electrical infrastructure by Yolo County would prove to be an incredibly difficult, if not nearly an impossible, undertaking.

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.

GSF Response: As noted prior, PG&E's electrical infrastructure does not fall under the jurisdiction of Yolo County and relocating would be a very challenging, if not impossible undertaking by the County. Further, the existing infrastructure is all located near or on Prime Farmland as shown in Figure D-2 of the DEIR. The Gibson project was developed specifically to meet a need for local solar energy facilities from VCE. VCE has since updated their goals to reflect no further need for new local solar, and instead will focus on siting batteries in Yolo County, which have a much smaller footprint and can be more easily sited on less land. It should be noted that the project contemplates a life span of 35 years, and as part of the ordinance, is required to both mitigate via agricultural easement (Per the County's Agricultural Conservation and Mitigation Program) AND post a decommissioning bond to ensure removal at the end of the project's useful life. Please refer to COA #17 for more detail on this.

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.

GSF Response: The project site was selected in part because of historic dwindling of surface water and groundwater supplies. Further, a multi-use plan to help address some of these concerns was voluntarily developed by the project applicant, and in addition, the research partnership with UCD will only serve to help develop novel solutions that can benefit future solar energy facility installations.

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 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.

GSF Response: Residential solar costs approximately 3-4x for rooftop versus a solar farm and the levelized cost of energy (LCOE) is 6-8x less valuable (or more expensive energy). Rooftop also does not typically include storage historically; however VPPs are becoming more prominent. That said, to provide whole house backup for these customers is commercially nowhere close to affordable, for these few choice hours of the year. The potential for a microgrid is much more realistic and would have a significantly greater impact for energy reliability for everyone that utilizes this circuit for energy delivery.