

Planning and Community
Development Department
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Officer



County of Sacramento

Municipal Services Agency
STEVEN C. SZALAY, Interim County Executive
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DELIVERED FEBRUARY 15, 2011, VIA EMAIL TO:
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sneidich@energy.state.ca.us

February 14, 2011

California Energy Commission
Dockets Office, MS-4
RE: Docket No. 02-REN-1038
1516 Ninth Street
Sacramento, CA 95814-5504

DOCKET	
02-REN-1038	
DATE	Feb14 2011
RECD.	Feb15 2011

RE: RP3 Grant-Request for Comments on the Proposed Renewable Planning & Permitting Program Grants

Dear Commissioners:

Thank you for the opportunity to provide comments on the Proposed Renewable Planning and Permitting Program Grants (RP3 Grant). The RP3 Grant has the potential to advance renewable energy projects and stimulate economic development throughout the state by providing local governments with the tools necessary to evaluate and expedite proposed projects. On behalf of Sacramento County, I am supportive of the state's efforts to assist local governments and eager to learn how the County can take advantage of this program to create a framework for evaluating and expediting large-scale, renewable energy projects.

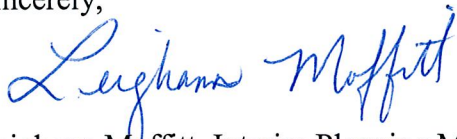
Sacramento County has been processing applications for large-scale solar, photovoltaic installations in rural areas on an individual basis. We anticipate additional applications for renewable energy projects in the future. Our current General Plan and Zoning Code are not detailed enough to streamline the planning, siting, evaluation and permitting of desirable renewable energy facilities. The County's General Plan contains an Energy Element that has not been significantly revised since adoption in the 1970's. The County's Zoning Code requires all renewable energy facilities to go through an entitlement process that does not provide any incentives for renewable energy facilities. The County currently reviews each application on a case-by-case basis without the benefit of an updated comprehensive strategy. This approach leads to:

- more time-consuming and costly application processes for project proponents
- less effective coordination with state and federal agencies responsible for protecting sensitive habitat and endangered species
- less certainty for project proponents and community members.

The County estimates that updating the Energy Element to create a policy framework for evaluating and expediting large-scale renewable energy projects will cost approximately \$700,000 for staff time, environmental review and zoning code amendments. The County Board of Supervisors has voiced strong support for this effort, but the County has been unable to secure monies necessary to fund such an undertaking. Sacramento County has been working with the Sacramento Municipal Utility District (SMUD) in hopes of initiating planning and zoning efforts to streamline project approval. Fiscal constraints and lack of financial resources by both the County and SMUD have prohibited these efforts from advancing.

We are excited and optimistic that the RP3 Grant may be available to help the County create a comprehensive strategy as described above. To that end, please find attached general comments regarding the RP3 Grant and responses to questions posed by the CEC. Again, on behalf of Sacramento County, we appreciate the opportunity to respond to this important and timely grant program. Should you desire additional information or comments, please do not hesitate to contact me at (916) 874-5584 or our Infill Coordinator, Judy Robinson (916) 874-4551.

Sincerely,



Leighann Moffitt, Interim Planning Manager
Planning and Community Development

LM:JR:dlr

Attachment

ATTACHMENT TO CORRESPONDENCE DATED FEBRUARY 14, 2011

RP3 Grant-Request for Comments on the Proposed Renewable Planning & Permitting Program Grants

General Comments:

1. The key challenge for Sacramento County is a lack of financial resources to make the necessary policy and zoning changes to facilitate renewable energy project planning, siting and permitting.
2. Sacramento County has very qualified Planners and Environmental Analysts that can perform the necessary land use assessments and surveys of habitat, open spaces and agricultural land to identify appropriate sites for large-scale renewable energy projects. Our staff is also well positioned to conduct the public outreach, environmental analysis, and General Plan and zoning amendments necessary to create a streamlined process for renewable energy projects. While we would benefit from the state's expertise on such matters, the greatest benefit the state could provide is funds to cover County staff time, as without such support, this effort will not likely move forward.
3. Grant applications and administration can be a cumbersome and expensive undertaking for local governments. We would ask that you consider a simple application process with a per capita allocation for jurisdictions interested in doing this work, making it as easy as possible for entities to apply and receive funding. Awards should be at least \$350,000 for jurisdictions with over 1 million population to complete any level of meaningful work in reducing regulatory hurdles.

Responses to Questions Posed by the CEC:

- *What are the key challenges with planning, permitting and environmental issues in your local jurisdiction related to renewable energy development?*

Sacramento County is home to hundreds of square miles of relatively flat, open and undeveloped rural land that support a variety of activities and ecosystems, including:

- agricultural and rangeland operations
- sensitive habitat (including significant vernal pool complexes) that are home to a number of endangered species
- lands within the Primary and Secondary Zones of the Delta that play a key role in the state's Delta-related planning efforts
- various recreational opportunities, including hiking, birding, canoeing, rafting, etc.

The very characteristics that support these activities and ecosystems (flat, open and undeveloped land near the regional core and infrastructure) make these rural areas very appealing sites for large solar photovoltaic installations. The County wants to encourage and expedite such projects, but must do so in a manner that does not conflict with the longstanding activities and ecosystems mentioned above. The County has not yet created a policy framework for addressing this issue, leading to uncertainty about what constitutes an appropriate site for such facilities.

- *What steps, information, tools, resources, etc. are necessary to revise the current land use plans and/or General Plans of your local jurisdiction to expedite the permitting process for renewable energy projects?*

Sacramento County does not have policies or procedures in place to adequately evaluate proposed large-scale renewable energy facilities. The County's General Plan contains an Energy Element that has not been significantly revised since adoption in the 1970's. The County Board of Supervisors has voiced strong support for updating the Energy Element to address appropriate planning and siting of such facilities. However, the County has been unable to secure funding for this effort.

- *Does your local jurisdiction currently have best practices in place for permitting renewable energy projects?*

The County has a long history of promoting and facilitating small scale renewable energy installations. For example, Sacramento County waives permit fees for photovoltaic solar panel installations on existing residential buildings. In addition, the County's General Plan Public Facilities Element contains a strong policy framework that helps guide planning and placement of renewable energy facilities installed by utilities. However, a number of private applications were recently filed with the County for large-scale solar installations in rural areas. The County has far less experience processing such applications and does not have strong policies or procedures to guide planning and permitting projects of this type and scale.

- *What additional funds, resources, or tools would be required to develop new plans, policies or ordinances to expedite renewable energy development in your local jurisdiction?*

The County estimates that updating the Energy Element to create a policy framework for evaluating and expediting large-scale renewable energy projects will cost approximately \$700,000 for staff time, environmental review and zoning code amendments.

- *Will your local jurisdiction be able to contribute match funds for an RP3 grant to develop the needed new plans, policies, or ordinances to expedite renewable energy development? If so, how much? Has your local jurisdiction already begun the process to develop such plans, policies, or ordinances?*

At this time the County cannot commit to providing matching funds for an RP3 grant. However, the County could potentially provide staff resources as an in-kind match. The County and SMUD have discussed the need for developing plans, policies and/or ordinances to facilitate installation of renewable energy projects for many years. The limiting factor has been, and continues to be, a lack of funding.

- *Does your current local jurisdiction's renewable energy development plan integrate with regional or statewide energy plans such as; Desert Renewable Energy Conservation Plan, Renewable Energy Transmission Initiative, a Natural Community Conservation Plan, or a Habitat Conservation Plan?*

The County is spearheading a multi-jurisdictional effort to craft and adopt a Habitat Conservation Plan (HCP). A draft plan was recently released and is currently undergoing environmental review. Natural features that provide a hospitable environment for habitat and species covered under this plan (relatively flat, open expanses of undeveloped land) also provide an ideal environment for large-scale solar installations. While the County is committed to adopting and implementing the HCP as well as encouraging appropriately-sited renewable energy installations, the County does not have policies or ordinances in place that address how both goals can be achieved simultaneously.

- *How will your local jurisdiction's planning effort help it reach state renewable energy procurement goals (Renewables Portfolio Standard – 33 percent by 2020), and reduce greenhouse gas emissions (AB 32)?*

While the County will continue to support and incentivize small installations, creating a comprehensive strategy for strategic placement and evaluation of large-scale renewable energy facilities will allow the County to more efficiently and cost-effectively process applications for such projects. This will result in larger more productive projects being built and put into use. Large-scale facilities will be key to achieving the RPS and reducing GHGs per AB 32, as their sheer scale and relatively low infrastructure needs allows them to be more cost effective than smaller installations.