

DOCKETED

Docket Number:	15-OII-01
Project Title:	Siting Compliance Process Review and Improvement Proceeding
TN #:	206402
Document Title:	Center for Biological Diversity's Scoping Comments
Description:	N/A
Filer:	System
Organization:	Center for Biological Diversity/Lisa Belenky
Submitter Role:	Public
Submission Date:	10/19/2015 3:47:23 PM
Docketed Date:	10/19/2015

Comment Received From: Lisa Belenky

Submitted On: 10/19/2015

Docket Number: 15-OII-01

Center Scoping comments

Additional submitted attachment is included below.

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:

Siting Compliance Process Review and
Improvement Proceeding

Docket No. 15-OII-01

**CENTER FOR BIOLOGICAL DIVERSITY'S
SCOPING COMMENTS**

October 19, 2015

Lisa T. Belenky, Senior Attorney
Center for Biological Diversity
1212 Broadway, Suite 800
Oakland, CA 94612
Phone: 415-632-5307
lbelenky@biologicaldiversity.org

Ileene Anderson
Public Lands Desert Director
Center for Biological Diversity
PMB 447
8033 Sunset Boulevard
Los Angeles, CA 90046
(323) 654-5943
ianderson@biologicaldiversity.org

INTRODUCTION

The Center for Biological Diversity (“Center”) timely provides these initial scoping comments on this process. The notice seeks input on the following issues:

Topics to Consider

- How to reduce the number of amendments or time to process amendments
- If and when appropriate to allow more flexibility for staff approval of project changes

where applicable

- Streamline and standardize compliance processes and reporting requirements
- Transparency of the compliance process and public participation
- Improving the implementation of Conditions of Certification
- Investigations
- Enforcement

The Center supports the idea of streamlining and standardizing the process, increasing transparency, and ensuring that all conditions of certification have been implemented. Below are a few initial thoughts on these issues, we also hope to participate in the upcoming workshop on October 23.

We are concerned that a proposal to allow staff to approve project changes “where applicable” may result in a series of changes being made that appear minor at the time but are collectively significant and which should have been evaluated together in a formal process including public comment and, potentially, additional environmental review. Clear limits and sideboards are needed if the Commission considers allowing this proposal to go forward. At minimum, any proposed changes to the project that is considered for staff only approval would need to be noticed to the parties and the public listserve for input on the change as well as for input on whether staff-only approval is appropriate in that instance.

Transparency of compliance is particularly important. One improvement we would suggest is that compliance reports be required to include and index and a hyper-link index or separate chapters so that the public can review the different subject areas tmore easily. Currently, many of the compliance

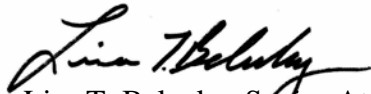
reports are filed as a single very large PDF in which it is difficult to find the various sections that members of the public may wish to review.

CONCLUSION

We look forward to working with the Commission and the stakeholder process to improve the compliance process.

Dated: October 19, 2015

Respectfully submitted,



Lisa T. Belenky, Senior Attorney
Center for Biological Diversity
1212 Broadway, Suite 800
Oakland, CA 94612
Phone: 415-632-5307
lbelenky@biologicaldiversity.org

Ileene Anderson
Public Lands Desert Director
Center for Biological Diversity
PMB 447
8033 Sunset Boulevard
Los Angeles, CA 90046
(323) 654-5943
ianderson@biologicaldiversity.org