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Del Norte El Dorado Glenn Imperial Inyo
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October 21, 2009

California Energy Commission
Dockets Office, MS - 4
Re: Docket No. 09-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET

09-IEP-1A

DATE OCT 21 2009

RECD. OCT 27 2009

Subject: Docket No. 09-IEP-1A/ "Draft 2009 IEPR"

Dear Members of the California Energy Commission:

On behalf of its thirty-one member counties, the Regional Council of the Rural Counties (RCRC) appreciates this opportunity to provide comments on the 2009 Integrated Energy Policy Report (Draft 2009 IEPR). RCRC would first like to applaud your efforts given the enormity of the task of addressing energy in the state. RCRC offers the following comments as it relates to land use and local government assistance as outlined in the Draft 2009 IEPR.

Land Use. Pages 16 - 17

The Draft 2009 IEPR makes four recommendations as follows regarding land use.

- *The state should assemble easy-to-use data and provide tool kits to help local land use planners make informed decisions about energy concerns and climate change.*

RCRC supports this recommendation. RCRC believes it is important the state provide the funding and other assistance to help local land use planners in their decision-making and not establish a prescriptive regulatory framework that hinders local land use decision-making.

- *The state should establish a comprehensive funding mechanism to support efforts by local and regional governments to prepare and implement land use policies consistent with the requirements of AB 32 that contribute significantly to achieving the state's 2050 greenhouse gas target reduction target.*

RCRC supports this recommendation for many of the same reasons stated above. However, RCRC would suggest that it should be a "comprehensive and **sustainable** funding mechanism" in order that local jurisdictions may adequately plan over the long term.

- *The state should recognize that rural regions differ from urban ones and insure that new sustainability, greenhouse gas, and energy requirements address these differences.*

RCRC supports this recommendation. RCRC is most appreciative of the state's recognition of this obvious yet often overlooked issue regarding the differences of urban vs. rural throughout California. One size really does not fit all and it is imperative that these differences are addressed on this and many other policy issues that face the state.

- *The state should encourage California's utilities to work with regional and local governments to promote climate friendly and energy efficient development in their service area.*

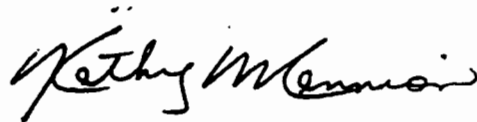
RCRC supports this recommendation. Many of the local utilities, much like the local jurisdiction, are keenly aware of the region's climate and other pertinent issues in the area and in "working with" the local jurisdiction can add value to the planning process.

Local Government Assistance. Page 36

At this time, RCRC would recommend that the California Energy Commission essentially use the land use recommendations as a template for local government assistance as the process moves forward. However, RCRC would like to strongly encourage funding for planning at the local land use authority level as a first priority. This will enable local governments to more expeditiously implement sustainability strategies into their General Plans.

Again thank you for the opportunity to provide comments on the Draft 2009 IEPR. Please contact Kathy Mannion at kmannion@rcrcnet.org or (916) 447-4806 with any questions or comments.

Sincerely,



Kathy Mannion
Legislative Advocate