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02-REN-1038	
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February 15, 2010

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

Sent in via-email: docket@energy.state.ca.us & sneidich@energy.state.ca.us

Re: EDC's Comments on the Proposed Renewable Planning and Permitting Program (RP3) Grants (Docket No. 02-REN-1038)

To Whom It May Concern:

Thank you for the opportunity to submit comments for the California Energy Commission's (CECs) Proposed Renewable Planning and Permitting Program (RP3) Grants (Docket No. 02-REN-1038). As indicated in the CEC request for comments, permitting renewable energy systems can be challenging for local municipalities. To facilitate the permitting process the CEC should expand the scope of the RP3 Grant program to allow local community groups and Non-Government Organizations (NGOs), not just municipalities, to apply for the Grant program. It has been our experience that local community support for renewable energy planning and permitting process is very important.

The Environmental Defense Center (EDC) is a non-profit, public interest law firm dedicated to empowering citizens and community groups to defend the natural treasures within and offshore Santa Barbara, Ventura and San Luis Obispo Counties. Our mission is to protect and enhance the local environment through education, advocacy, and legal action. Program areas include protecting coast and ocean resources, open spaces and wildlife, and human and environmental health. EDC recognizes the need to move away from fossil fuels and advocates for responsible renewable energy development that

engages stakeholders early on in the process, addresses and minimizes environmental impacts, and is properly sited.

It has been our experience in the Counties of Santa Barbara, Ventura, and San Luis Obispo that local community members closely monitor energy development and want to be involved in the siting of utility scale renewable energy projects. While recognizing the need to transition to renewable energy, the best approach for doing so can nevertheless generate controversy and difference of opinion. In addition, sensitive or controversial issues exposed late in the review process can cause unnecessary frustration, costs, and delays for all parties involved, including the project applicant, agencies, community members, and NGOs.

Recognizing this challenge we recommend that the RP3 Grant program be expanded to include community groups and NGOs, as well as municipalities. Community groups can serve an important role in the planning and permitting by facilitating transparent processes and building community support for projects. For example, we have participated in an informal pre-planning early consultation process for onshore and offshore renewable energy projects in our region. During this pre-planning process applicants are encouraged to work with agencies, the public and NGOs to resolve concerns before they submit their final project application. This effort, facilitated by a local NGO, has been instrumental in building working relationships between the project applicant and the community. The unique role that NGOs hold as independent parties, unlike some agencies, governments, and developers, can be instrumental for resolving public concerns *before* an applicant submits a final application.

Community groups and NGOs have an important role to play in the planning and review process for renewable energy projects. By expanding the RP3 program to include these groups there is a possibility for enhanced agency and public cooperation, and possibly a shortened environmental review process. Thank you for your consideration of our comments and we look forward to working on this program with you.

Sincerely,



Kristi Birney,
Marine Conservation Analyst