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Siting/Dockets Unit
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: RP3 Grant - Docket No. 02-REN-1038

To Whom It May Concern:

Thank you for this opportunity to comment on the proposed Renewable Planning and Permitting Program (RP3) Grants. The County of San Diego encourages the CEC to move forward with the development of the grant program to provide assistance to local jurisdictions in evaluating and expediting renewable energy development projects. During the last couple of years, as part of an overall County strategy to promote renewable energy, the County Department of Planning and Land Use has initiated a number of amendments to our Zoning Ordinance to clarify and simplify existing provisions related to renewable energy systems. Currently the County is in the process of preparing comprehensive amendments to our wind turbine regulations and is also preparing an associated EIR.

During this time the County has and continues to be challenged by the complexities of properly planning for the siting and permitting of renewable energy developments. Furthermore, as economic priorities shift, local funds for the time needed to complete high quality land use plans, policies and ordinance associated with this often times controversial land use are inadequate or minimal at best. To assist the CEC in following through with the development of what is sure to be a beneficial program for local jurisdictions, the County of San Diego provides the following responses to your questions.

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

The key challenges in San Diego County related to renewable energy development are:

- Inadequate resources and information regarding existing renewable energy technologies, for example very little information exists on the impacts associated with small wind turbines. This affects our ability to develop adequate County policies and ordinances.
- Lack of federal or state resources, guidance and publications regarding impacts associated with renewable energy development, for example noise impacts associated with commercial wind turbine projects.
- In San Diego County there is high resistance to commercial wind energy projects within San Diego County's backcountry area. These areas have been identified as excellent wind resource areas. Primary issues deal with biological, aesthetic, and noise impacts. Related to these environmental issues, concerns about the health effects of turbines and property values have also come to the forefront.
- CEQA processing related difficulties with creating ordinances for the allowance of by-right or ministerial small-scale wind energy facilities.
- Inadequate or appropriate locations for large scale solar installations. For instance siting these facilities on disturbed lands versus undisturbed lands.
- Inadequate funding and financial resources to move forward with planning efforts for the creation of ordinances or comprehensive master plans for renewable energy development.

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?

The County's General Plan is currently being updated and will contain new and revised goals and policies related to renewable energy development. The availability of resource documents would assist in assuring that land use plans are in line with the appropriate renewable energy information and technologies which would lead to implementing documents which could help to streamline existing processes. State guidelines would also provide "cover" to local jurisdictions when developing findings justifying the establishment of renewable energy regulations.

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

The County of San Diego currently has a Green Building Program which provides incentives to home owners and contractors for the permitting of energy efficient measures into construction projects. One of most successful components of the program is exempting homeowners from building permit fees associated with PV solar installations.

The County's Zoning Ordinance was amended in 2010 to allow greater flexibility for the permitting of small wind turbines and small-scale commercial PV solar systems. Although these amendments are a helpful upgrade to our existing ordinance and do

make the permitting of these types of facilities less onerous, they still require discretionary actions subject to environmental review.

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?

- Because this is an ever-expanding land use and technologies are constantly evolving, high-level resource and guidance documents are essential to local governments to justify their local land use plans, policies and ordinances as well as assuring some state-wide consistency.
- Amendments to CEQA would be helpful to incorporate possible environmental exemptions related to renewable energy developments. This would play a big part in expediting renewable energy development.
- To stay current with renewable energy information, a great deal of staff time and funding is required to formulate adequate local policies and ordinances. Having funding opportunities in the form of grants would be essential to the development of a local renewable energy team to assist in the coordination of staff and resources for the creation of comprehensive renewable energy ordinances.

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?

Given the state of the economy which is requiring local jurisdictions to make difficult choices as to what to fund, it is unlikely that significant matching funds would be available and we would recommend that any grant program not use matching funds as a part of a ranking system.

Has your local jurisdiction already begun the process to develop such plans, policies, or ordinances?

As mentioned above, as part of comprehensive amendments to the General Plan, the County has included goals and policies related to renewable energy developments to reduce non-renewable resource consumption and GHG and other air pollutant emissions.

Further, staff has completed Zoning Ordinance amendment to existing provisions to assist in the permitting of small scale commercial solar energy facilities and to allow greater flexibility in the permitting of multiple small wind turbine facilities for on-site use.

The County of San Diego is currently in the process of conducting a comprehensive amendment to our Zoning Ordinance related to wind turbines. The amendments propose to include a by-right small wind turbine component for on-site energy

consumption as well as amendments to the large-scale wind turbine (off-site consumption) regulations to make these provision more in-line with current facility size, operations and technologies. The County is preparing an EIR for this Zoning Ordinance amendment.

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?

No

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)?

The goals and policies of the General Plan will promote and encourage the use of renewable energy projects. Recent proposed amendments to the County Zoning Ordinance should help in expediting the permit process for solar and wind energy developments and in some cases propose to allow small wind facilities by-right.

Furthermore, the County of San Diego has a Strategic Energy Plan (attached to email) which includes a County Community Energy Strategy that contains a number of goals and strategies to help in the expediting and streamlining of the County's codes and ordinances for the benefit of renewable energy technology. Developing implementation measures to address these strategies will go a long way in addressing the Renewables Portfolio Standard and GHG emissions.

Please do not hesitate to contact me should you have any follow-up questions at 858-694-3690 or at joseph.farace@sdcounty.ca.gov.

Sincerely,



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