

Response to Request for Comments on the Proposed Renewable Planning and Permitting Program (RP3) Grants (Docket No. 02-REN-1038)

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DOCKET
02-REN-1038
DATE _____
RECD. <u>Mar 07 2011</u>

Questions:

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

As someone who spent 12 years as a City Councilmember, and now as head of a company that provides inspection and permitting services to the solar industry, and as someone who has spent three years as Chair of the permitting committee for a solar industry group, I feel strongly that the biggest challenges are standardizing the permitting process for standard rooftop residential installations, and allowing third party permitting and inspections. As outlined below, these two steps will do more than anything to expedite the delivery of solar AND improve solar installations.

• 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 most important step that can be taken is to standardize the permitting process across jurisdictions, particularly for standard residential roof installations, which make up the vast majority of permits issued. Whatever the state can do to encourage, lead, or otherwise induce a standard application (I suggest Solar ABCS) would be tremendously helpful.

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

Almost every jurisdiction we work in, here and in other states, has what they consider best practices. The problem is they are different practices, and this creates the slowdown in getting projects done in multiple jurisdictions. We have developed a set of best practices that we use, including a four page quality inspection, that goes far beyond what local jurisdictions require. This quality inspection is used by many of the leading solar companies to provide assurance that the projects meet the highest standards, and are done AFTER the jurisdiction completes its inspection.

• 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?

Strong, focused tools like the Solar ABCS permitting model are available. The most significant resources needed are available, trained inspectors and plan checkers who understand solar. The problem is that the vast majority of

jurisdictions have undergone significant cuts that have decimated their staff, caused the layoffs of the most qualified solar personnel, and made it extremely difficult for staff to take the time off or expend the funds required to get trained.

As an alternative, we strongly suggest encouraging jurisdictions to allow third party plan checks and inspections that use industry best practices. This would alleviate local jurisdictions from the demands of the solar industry, drive local jurisdictions toward standardization, improve the quality of solar installations, and expedite solar deployment.

• 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?

We work in hundreds of cities and counties, and know of few that have the resources to dedicate to this in a sustainable way. As noted above, most jurisdictions have decimated staffing levels that no one expects to be replaced, which means that as building increases there will be increasing burdens on staff to perform other permitting and inspection functions which will further increase the time it takes to get a solar inspection. In addition, even if a city had the funds to put towards this, most remaining staff are already performing extra duties, making it less likely they could get trained, and then maintain that training, to keep up with growth in the solar industry. My concern is that resources are expended to get some staff up to date, but that those staff retire or are unable to keep up with their training and we are therefore unable to sustain gains.

• 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?

Our local jurisdiction, Santa Clara County, is finalizing an NCCP/HCP that is coordinated with the jurisdictions in South Santa Clara County.

• 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)?

Again, as a former elected official I can say that most local jurisdictions favor plans to reach these ambitious RPS goals. The problem is that there are far fewer staffing or financial resources available. Planning efforts can help local jurisdictions, but if these efforts are not accompanied by a way of helping achieving these goals in an expeditious and cost-effective manner, they will be very difficult to achieve.