



## DEPARTMENT OF PLANNING AND BUILDING

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January 2, 2012

Eli Harland  
California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 12-GREP-1  
1516 Ninth Street  
Sacramento, CA 95814-5512

California Energy Commission

**DOCKETED**  
**12-GREP-1**

TN # 69006

JAN 02 2013

**SUBJECT: Docket No. 12-GREP-1**

Dear Mr. Harland:

San Luis Obispo County appreciates the opportunity to submit comments on the subject grant solicitation. The County is very interested in this grant opportunity, as we recently added guiding renewable energy policies to our general plan. As requested, we are providing responses to the California Energy Commission's questions that will be considered as this grant is developed. Here are our responses:

1. What are the renewable energy and natural resource conservation planning needs and priorities in the qualified counties?

**Response:** San Luis Obispo County adopted a Conservation and Open Space Element (COSE) in 2010. The COSE Energy Chapter sets out the County's renewable energy and natural resource conservation policies. Our priorities now are to follow up the initial policy and program identification work with program implementation. Our specific needs include:

- a. Development of an ordinance guiding the permitting of larger renewable energy projects and allowing smaller projects "by right", using the California County's Planning Director Association's (CCPDA) model ordinance with local revisions. The County would also amend its general plan "combining designations" or overlays to identify the areas mapped in c below.
  - b. Preparation of a programmatic CEQA evaluation of the proposed ordinance with a focus on those areas identified as opportunity locations for future renewable energy projects.
  - c. Mapping of renewable resources in the county such as wind, solar and geothermal.
2. What types of development or revision of rules and policies should be funded through this grant?

**Response:** Funding should be aimed at advancement of streamlining efforts such as SLO County's. General Plan policy work to identify renewable energy policies and program identification has already been completed and the proposed funding will be used for program implementation. Specifically, the County proposes to use the funding to develop and adopt an ordinance that will streamline the permitting process for small and mid-size renewable energy projects and will allow certain smaller renewable projects (1-4 MW) "by right" and lower land use permit levels for mid-size projects (5-10 MW). This will enable these projects to be constructed and commissioned much quicker than has been experienced. We propose to use the CCPDA Solar Energy Facility (SEF) Guidance Document and SEF Model Streamlining Ordinance as our guide.

3. What barriers to implementation of the rules and policies do counties face? For example, resource, financial, and/or legal constraints.

**Response:** The County has experience permitting both small and utility scale renewable energy projects. The barriers the County faced in permitting these large and small scale projects were:

- a. CEQA documents were very expensive, time consuming and often redundant for similar projects. Preparation of the EIR's for two large solar projects (Topaz Solar Farm 550 MW and California Valley Solar Ranch 250 MW) in the eastern San Luis Obispo County's Carizzo Plain area took more than 2.5 years to complete. The time spent on document preparation made up the bulk of the permitting time for these important, large renewable energy projects.
  - b. The County had no local ordinance to address issues as they arose. Instead, every issue needed to be addressed from the ground up. This often was done twice as there were two projects undergoing separate environmental review. This process was very time consuming, lacked certainty and consistency and could have been resolved through the framework being proposed through this solicitation response.
  - c. The two utility scale solar projects were successfully permitted and are now under construction. However, the County needs data on other, optimal locations for renewable energy projects. We have some results from early mapping efforts as part of the RETI and wind mapping from NOAA. We see this as a resource identification issue that can be addressed through better mapping of resource areas and protection of those areas from incompatible development. Also, if definitive areas are proposed for renewable energy overlays
4. How will the development or revision of rules and policies described in answers questions 1 and 2 facilitate the development of eligible renewable energy resources, their associated electric transmission facilities, and the processing of permits for eligible renewable energy resources?

**Response:** The implementation of the County's general plan policies and program for renewable energy projects will result in much faster permitting for renewable energy projects due to: 1) the completion of a programmatic CEQA document focused on those locations that are most suitable for these types of projects; 2) development of an ordinance that allows certain renewable energy projects to proceed "by right" thereby eliminating a 18-36 month permitting processing; and 3) detailed mapping of areas best suited to renewable energy projects (e.g wind, solar and geothermal).

5. How much will the development or revision of rules and policies described in questions 1 and 2 cost and how long will it take to complete? Can the development or revision of these rules and policies be completed in phases if funding for such work and time to expend such funds is limited and what would that phasing look like?

**Response:** The major cost associated with this project is the preparation of a programmatic CEQA review document that can be used for future renewable energy projects. Other costs will include consultant and staff time for resource mapping and ordinance development. The program could be funded and developed in phases with mapping and ordinance development first and CEQA in a later phase. This would stretch the time frame to over 3 years. However, the County is willing and able to complete the program in less time (24 months) and in one phase, if funding is available. This shortened time frame should not cost more than \$700,000.

6. How many renewable energy projects has your county permitted to date? What were the resource types, sizes, and scales of these projects, and how long were the permitting processes?

**Response:** The County has permitted two utility scale solar projects and approximately 800 smaller solar projects.

	<b>California Valley Solar Ranch</b>	<b>Topaz Solar Farm</b>
<b>Output</b>	250 MW	550 MW
<b>Land Area</b>	1900 acres	4000 acres
<b>Transmission Lines</b>	3.6 miles	8 miles
<b>Miscellaneous</b>	R/O plant Mine Sub station	Sub station Staging Area Perimeter fence
<b>Time in process</b>	2.6 years	3.0 years

7. Do counties plan to work on revisions to rules and policies with regional partners? If so, what regional partners will you work with and what role will these partners play?

**Response:** The County has partnered with regional organizations on many energy related programs and projects. We would seek to continue our regional partnerships with the seven cities in the county, other public entities, neighboring counties, and renewable energy industry stakeholders. Specifically, the County would seek to partner with PG&E, the Farm Bureau, and the Economic Vitality Corporation's Green Energy Business Cluster which is made up of prominent local and national renewable energy companies.

8. What criteria should the Energy Commission use to score and rank grant applications? Please offer specific criteria and the rationale/basis for such criteria.

**Response:** There are three important criteria to use to rank grant applications:

- a. Program Readiness – Is the policy framework already established? Have some “stakes” already been driven so that grant funded work does not have to start programs from scratch. The “shovel-ready” program will show results much faster than one that starts from scratch. Additionally, a program that is ready to roll out can become a template for those coming later.
  - b. Program Results – Will the result of the grant project be usable for renewable energy projects? Will it result in an ordinance that offers consistency in decision making and design, CEQA review that will streamline the CEQA process and identify areas that contain renewable resources? A program that results in a usable ordinance, CEQA review and mapping protocol will be suitable as a template for others.
  - c. Track record – Does the jurisdiction have a proven track record of permitting large renewable energy projects? Is the jurisdiction's general plan committed to encouraging these types of renewable energy projects?
9. Should the Energy Commission create two funds within this grant solicitation with one providing criteria and funding for counties in the DRECP and one providing criteria and funding outside of the DRECP? If so, how should the criteria and funding amounts for DRECP and non-DRECP counties differ? Should the funding be allocated competitively?

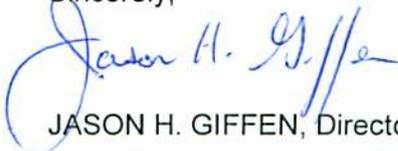
**Response:** The County would support two funds within the grant solicitation divided between DRECP counties and non-DRECP counties. The needs and priorities of DRECP and non-DRECP counties are different. Ensuring geographic diversity in the awarding of these grants will maximize their benefit and the cost-effectiveness of grant funding and will provide market diversification for renewable energy deployment.

10. Public Resources Code Section 25619(b) allows the Energy Commission to allocate not more than 1 percent (\$70,000) of the appropriated funds to provide training to county planning staff to facilitate the siting and permitting of eligible renewable energy resources. What type of training will benefit county planning staff the most?

**Response:** While the County is aware of resource mapping information we have accomplished, a short course on available mapping sources may be helpful.

If you have any questions, please contact me at (805) 781-5708 or via e-mail at [jgiffen@co.slo.ca.us](mailto:jgiffen@co.slo.ca.us).

Sincerely,



JASON H. GIFFEN, Director

Cc: Leslie Brown  
Ellen Carroll  
James Caruso