

**Public Comment Received between
March 18, 2015 and March 24, 2015 (as of 2:00pm)**

From: Nicholas Solakian < >
Sent: Wednesday, March 18, 2015 8:19 AM
To: CEQA contact
Subject: Greenhouse Gas Emissions

Please join EDC and CEC, as well as other local groups, in requesting a “zero emission threshold” so that ALL new GHG emissions will be disclosed and mitigated. The threat of climate change is too urgent to ignore the impact of any new emissions. We need to reduce, not increase, carbon emissions into the atmosphere.

thanks,
Nicholas

--

From:
Sent: Wednesday, March 18, 2015 9:15 AM
To: CEQA contact
Subject: Support for zero GHG emissions

It is important that our region establish a zero greenhouse gas emission standard if we are going to seriously address the issue of climate change. I support the position of a zero standard that will be under consideration at the hearing next week on March 25.

Dennis Allen

From: max golding <
Sent: Wednesday, March 18, 2015 9:54 AM
To: kevin@countyofsb.org; CEQA contact
Subject: Zero emissions threshold

To Whom It May Concern,

Based on the assumption that the consensus of climate scientists is correct, that we must stop emitting GHGs as fast as possible and transition to a renewable energy economy yesterday, it's a no brainer. But then you have this industry saying to you that setting a zero GHG threshold will do the following:

- Force them to lay people off or cut their wages
- Frame this as "crazy environmentalists" who are being brainwashed by the "Big Green NGOs"
- Try to confuse you and shed doubt about climate science, citing fringe scientists and studies funded by think tanks they created for this exact purpose
- Claim that the county will go bankrupt and it will be your fault

We saw it during Measure P and during the SME hearings. It has probably happened before I came along, maybe some of you have seen this circus over and over for decades. These people are ruthless and deceptive. Remember the motives behind what they're saying.

They will bring in oil workers and line them along the walls to intimidate you. They might bus them in from another county but won't tell you, the workers will if you ask them. They will self-victimize and say that government and activists are the real bullies when they're the ones pushing to undo AB32. They're the ones who have been funding climate denial think tanks. They're the ones who fight tooth and nail for every project that society now understands to be the wrong direction for the world.

Remember that those of us doing this are volunteers. We have busy lives and it is difficult for us to keep up with all these things, to write comments, to attend hearings, to stay motivated and involved at a consistent rate. I have two jobs and am in grad school. I have a personal life. I do not enjoy writing these emails, to be honest. I would rather be gardening, running, swimming, listening to music.

Do the responsible thing, and remember their motives and remember you are being manipulated when they speak. Remember the precedent you can set here. Remember that your decision is a legacy for future generations everywhere.

Zero emissions threshold. It's a no brainer.

Thank you.

Max Golding
350 Santa Barbara co-founder
Antioch Santa Barbara MACP Program

From: John Dutton < >
Sent: Wednesday, March 18, 2015 10:59 AM
To: kevin@countyofsb.org; CEQA contact
Subject: Minimum Amount of GHG to Trigger Review

To whom it may concern,

I would like to request that any greenhouse gas emissions from new projects be reviewed and mitigated before the project is approved. The threat of climate change is too real and already upon us. NOAA scientists say we have only one year of water reserves left if the drought doesn't end, and it doesn't look it's going to end anytime soon. We are hitting record high temps nearly every week. Our verdant coastal community will soon be a desert. We need to be reducing our GHG emissions not increasing them with new projects. We need to act now and cut carbon emissions rather than approving more.

Sincerely,
John Dutton

Santa Barbara, Ca 93110

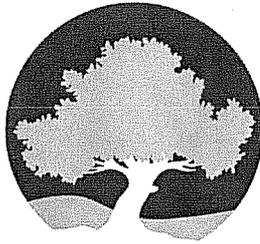
From: Linda Krop
Sent: Friday, March 20, 2015 11:21 AM
To: CEQA contact
Subject: EDC letter re GHG threshold
Attachments: EDC letter to SBCAPCD re GHG emission guidelines_2015_01_16.pdf

Please distribute the attached letter to the APCD Board and CAC.

Thank you,
LK

Linda Krop, Chief Counsel
Environmental Defense Center
906 Garden Street
Santa Barbara, CA 93101
Phone (805) 963-1622, x106
Fax (805) 962-3152
www.EnvironmentalDefenseCenter.org

CONFIDENTIALITY NOTE: The information contained in this communication may be confidential, is intended only for the use of the recipient named above, and may be legally privileged. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender and delete the original message and any copy of it from your computer system. Thank you.



environmental
DEFENSE CENTER

January 16, 2015

Ms. Molly Pearson
Santa Barbara County Air Pollution Control District
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110
ceqa@sbcapcd.org

Re: Updating District Environmental Review Guidelines to Address Greenhouse Gas Emissions under the California Environmental Quality Act (CEQA)

Dear Ms. Pearson:

Thank you for the opportunity to comment on the Santa Barbara County Air Pollution Control District's ("District") proposal to update its Environmental Review Guidelines to include guidance for evaluating the significance of the impacts of greenhouse gas ("GHG") emissions from new or modified stationary sources. This letter is submitted by the Environmental Defense Center ("EDC") on behalf of our members. Our organization is very involved in efforts to reduce climate change impacts in our community, and we represent clients in responding to projects that will generate new GHG emissions and contribute to cumulative climate change impacts.

Establishing an appropriate threshold for analyzing (and mitigating) GHG emissions is critical given the dire state of climate change in our community and around the globe. Recent scientific research demonstrates that climate change trends are much worse than previously thought, and potential impacts will be much more severe. These impacts will be felt locally, whether they are related to more severe droughts and reductions in available water supplies, or increased sea level rise affecting local beaches and structures, or increased fire risk, among other significant impacts. For this reason, EDC supports timely, thorough analysis and disclosure of GHG emissions, as well as full mitigation of impacts from such emissions.

EDC supports a zero emission threshold approach because this is the only approach that allows for full mitigation of impacts from new GHG emissions. This threshold finds support in CAPCOA's white paper on CEQA and climate change, and is utilized by the California State Lands Commission in its Environmental Impact Reports ("EIRs") for local oil and gas projects.

As there is ample opportunity for project proponents to fully mitigate their emissions, a zero emission threshold will not force projects into environmental review solely on the basis of projected GHG emissions.

Option 1- Zero Emission Threshold

EDC supports Option 1, which would establish a zero emission threshold for evaluating GHG emissions. This option would require the District to consider the full potential impacts of a proposed project, consistent with CEQA, and would provide the basis for considering the full array of potential mitigation measures necessary to avoid or substantially lessen a project's impacts.

The basis for this threshold is founded in the most current scientific studies, which demonstrate that global carbon levels are already unsustainable. These studies show that a target of 350 ppm for atmospheric levels of CO₂ is necessary to achieve climate stabilization and avoid disastrous global consequences.¹ Given that atmospheric levels have reached 400 ppm,² we are already on a trajectory that is not sustainable, and we must decrease GHG emissions more rapidly and to a greater extent than previously thought. Thus, *any* additional contribution of CO₂ would be a step further from acceptable target levels.

The potential consequences of global warming further underscore the need for a zero emission threshold. The Intergovernmental Panel on Climate Change ("IPCC"), Union of Concerned Scientists, and the California Climate Change Center have published several studies that identify how climate change will affect the environment.³ These impacts include an increase in water temperatures, rise in sea level, coastal erosion, reduction of the Sierra snowpack, increase in severity and frequency of storms, increased droughts, famine, changes in ecosystems, increase in heat waves, increases in pests and diseases, flooding, retreating glaciers, ozone formation, and the potential for wildfires.⁴ More recently, the U.S. Global Change Research

¹ Matthews H.D., and K. Caldeira (2008), *Stabilizing climate requires near-zero emissions*, *Geophys. Res. Lett.*, 35, L04705, doi:10.1029/2007GL032388; James Hansen, et al., *Target Atmospheric CO₂: Where Should Humanity Aim?* *The Open Atmospheric Science Journal*, 2008, 2, 217-231; Statements of Dr. Chris Field, Carnegie Institution for Science, *Decisive Action Needed as Warming Predictions Worsen*, Says Carnegie Scientist, available at

http://www.ciw.edu/news/decisive_action_needed_warming_predictions_worsen_says_carnegie_scientist
²<http://research.noaa.gov/News/NewsArchive/LatestNews/TabId/684/ArtMID/1768/ArticleID/10187/NOAA-Carbon-dioxide-levels-reach-milestone-at-Arctic-sites.aspx>

³ Union of Concerned Scientists. 2006. *California Global Warming Impacts and Solutions*, available at http://www.ucsusa.org/clean_california/ca-global-warming-impacts.html. California Climate Change

⁴ Karl, T.R., *supra*; Levin, K., *supra*, citing Emanuel, K., *Increasing Destructiveness of Tropical Cyclones Over the Past 30 Years* (*Nature*, vol. 436, August 4, 2005), P.J. Webster, et al., *Changes in Tropical Cyclone Number, Duration, and Intensity in a Warming Environment* (*Science*, vol. 309, September 16, 2005), NASA Earth Observatory, *Record Low for June Arctic Sea Ice* (June 2005 at earthobservatory.nasa.gov/Newsroom/NewImages/images.php3?img_id=16978), A.J. Cook et al., *Retreating Glacier Fronts on the Antarctic Peninsula Over the Past Half-Century* (*Science*, vol. 308, April 22, 2005), R.B. Alley et al., *Ice-Sheet and Sea-Level Changes* (*Science*, vol. 310, October 21, 2005), E.D. Domack, et al., *Stability of the Larsen B Ice Shelf on the Antarctic Peninsula During the Holocene Epoch* (*Nature*, vol. 436, August 4, 2005), F.S. Chapin III, et al., *Role of Land Surface Changes in Arctic Summer Warming* (*Science*, vol. 310, October 28,

Program released a report on “Climate Change Impacts in the United States” that identified current and projected effects of climate change on a regional basis in the U.S.⁵ This report confirms that climate change impacts from GHG emissions are real and must be addressed without further delay.

The use of a “zero emission” threshold is one of the options discussed in CAPCOA’s white paper on CEQA and climate change.⁶ According to the CAPCOA report,

The scientific community overwhelmingly agrees that the earth’s climate is becoming warmer, and that human activity is playing a role in climate change. Unlike other environmental impacts, climate change is a global phenomenon in that all GHG emissions generated throughout the earth contribute to it. Consequently, ***both large and small GHG generators cause the impacts.*** While it may be true that many GHG sources are individually too small to make any noticeable difference to climate change, it is also true that the ***countless small sources around the globe combine to produce a very substantial portion of total GHG emissions.***

A zero threshold approach is based on a belief that, 1) all GHG emissions contribute to global climate change and could be considered significant, and 2) not controlling emissions from smaller sources would be neglecting a major portion of the GHG inventory.

CEQA explicitly gives lead agencies the authority to choose thresholds of significance. CEQA defers to lead agency discretion when choosing thresholds. Consequently, ***a zero-emission threshold has merits.***⁷

A “zero emission” threshold has been used by the California State Lands Commission in its Final EIRs for the Venoco Ellwood Marine Terminal and Venoco Revised PRC 421 Recommissioning Project, and the Draft EIR for the Venoco Ellwood Full Field Project.⁸ We strongly encourage the District to utilize a zero emission threshold in its evaluation of direct and indirect GHG emissions.

2005), M. Hopkin, *Amazon Hit by Worst Drought for 40 Years: Warming Atlantic Linked to Both US Hurricanes and Rainforest Drought* (Nature, October 11, 2005), I.T. Stewart, et al., *Changes Toward Earlier Streamflow Timing Across Western North America* (Journal of Climate, vol. 18, April 2005).

⁵ Melillo, Jerry M., Terese (T.C.) Richmond, and Gary W. Yohe, Eds., 2014: *Highlights of Climate Change Impacts in the United States: The Third National Climate Assessment*. U.S. Global Change Research Program, 148 pp.

⁶ CAPCOA. 2008. *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Jan.

⁷ CAPCOA, p. 27, emphasis added.

⁸ Venoco Ellwood Marine Terminal Lease Renewal Project Final Environmental Impact Report, California State Clearinghouse (SCH) No. 2004071075, CSLC EIR No. 743, April 30, 2009; Venoco Revised PRC 421 Recommissioning Project Final Environmental Impact Report, California State Clearinghouse (SCH) No. 2005061013, CSLC EIR Number 732, January 2014; Venoco Ellwood Oil Development and Pipeline (Full Field) Project Draft Environmental Impact Report, State Clearinghouse No. 2006061146, CSLC EIR No. 738, June 2008.

A zero emission threshold will not result in elevated environmental review for new proposed projects. If a project would otherwise be exempt from environmental review, the fact that it will generate GHG emissions will not affect the applicability of the exemption. California Public Resources Code § 21084(b).

If a project would otherwise be subject to a negative declaration, the proponent can still avoid preparation of an EIR by incorporating available mitigation measures. In many instances, on-site mitigation measures may be available to adequately reduce GHG emissions. For example, in the case of Venoco's Revised PRC 421 Recommissioning Project, the EIR found that project emissions could be fully mitigated by replacing existing heater treaters with more efficient emulsion heaters.⁹ In addition to on-site measures to reduce emissions, there are ample state-certified programs through which applicants can purchase "credits" to fully offset any new GHG emissions. As noted in the District's fact sheet, it is entirely feasible for a project proponent to mitigate GHG emissions to a net of zero new emissions.¹⁰ We also support the District's consideration of a County-wide GHG emission credit program so that the co-benefits of emission reductions could be experienced in our community.

Option 2 – Bright Line (10,000 MTCO₂e/yr)

This option would establish a threshold at a defined amount of 10,000 MTCO₂e/year. Notably, several of the "pros" identified by the District for this option also apply to the zero emission threshold. For example, the zero emission threshold option is simple, easy to explain and provides for straightforward implementation. It is also easy to administer, and has been applied elsewhere without legal challenge (e.g., State Lands Commission EIRs referenced *infra*). And, as noted in the District's presentation, there is an exact nexus and proportionality between the impacts and any required mitigation. Accordingly, all of these "pro" arguments should also be applied to the zero emission threshold.

A numeric bright line provides simplicity and efficiency, but at 10,000 MTCO₂e/yr does not fully disclose and mitigate a project's cumulative climate change impacts. Districts, such as the South Coast and Bay Area AQMDs, have chosen this threshold with a goal of "capturing" 90 and 95%, respectively, of new project GHG emissions. For Santa Barbara County, however, a bright line threshold of 10,000 MTCO₂e would only capture approximately 50% of new project emissions. Thus, if the District intends to use a bright line approach, it should identify the bright line threshold for addressing 95% of new project emissions.

Our concern with this approach, obviously, is that it does not disclose all project impacts and does not require full mitigation of such impacts. In addition, the District would need to ensure that proponents do not piecemeal projects in an effort to avoid the threshold and thus avoid any mitigation requirements.

⁹ Venoco Revised PRC 421 Recommissioning Project Final EIR, p. 4-142.

¹⁰ Santa Barbara County Air Pollution Control District, *CEQA Significance Thresholds for GHGs – Questions and Answers*, pp. 3-5; see also California Climate Action Reserve, <http://www.climateactionreserve.org/>

Option 3 – Performance-Based Measures and Percent Reduction Consistent with AB 32 Goals

We strongly oppose any approach based on AB 32. Most importantly, this target only addresses emissions until 2020, and will be irrelevant to projects that will continue to generate GHG emissions beyond 2020. The state's 2050 goal set forth in Executive Order S-03-05 (reducing GHG emissions to 80% below 1990 levels by 2050) is more relevant for new proposed projects.

In addition, this target is based on outdated information. AB 32 was based on a target for global GHG emissions of 450 ppm. Consequently, this target was designed to allow a significant increase in GHG emissions over current levels. As noted above, more recent scientific evidence indicates that 450 ppm is too high and that agencies instead must work to achieve a target of 350 ppm. Thus, updated targets require a *decrease* in current emissions, which is much different from the increase contemplated and allowed in AB 32. Even at current levels, the effects of climate change are being felt throughout the globe.

Although we have raised this concern previously, it achieved additional traction and validation given the recent Court of Appeal decision in *Cleveland National Forest Foundation v. SANDAG*, attached hereto. In that case, the Court found that "SANDAG's decision to omit an analysis of the transportation plan's consistency with the Executive Order [S-03-05] did not reflect a reasonable, good faith effort at full disclosure and is not supported by substantial evidence because SANDAG's decision ignored the Executive Order's role in shaping state climate policy." (Slip Opinion at p. 14.) This omission "deprived the public and decision makers of relevant information about the transportation plan's environmental consequences. The omission was prejudicial because it precluded informed decisionmaking and public participation." (*Id.* at p. 15.) Therefore, the court ordered SANDAG to analyze the plan's consistency with the state's 2050 target set forth in S-03-05.

Accordingly, as much as we oppose the use of this approach, we recommend that if a percent-reduction approach is used, it must be based on 2050 targets.

Option 4 – Percent Reduction from Business-as-Usual

Similarly, this approach will not fully disclose or mitigate all project impacts. To the extent this approach is pursued, it is important that the goals reflect up-to-date scientific information and achieve long-term targets for project mitigation.

Conclusion

In conclusion, we encourage the District to adopt a zero emission threshold because it is the only threshold that will disclose all project cumulative effects and allow for adequate mitigation. This threshold will not force projects into environmental review solely on the basis of

January 16, 2015

Molly Pearson, SBC APCD re Environmental Review Guidelines for GHG Emissions

Page 6

projected GHG emissions because there are ample opportunities to fully mitigate GHG emissions.

Thank you for your consideration of these comments. Please do not hesitate to contact me if you have any questions concerning these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Lkrop".

Linda Krop
Chief Counsel

cc: Glenn Russell, SBC Planning and Development Department

Att: *Cleveland National Forest Foundation v. SANDAG*

From: Molly M. Pearson
Sent: Friday, March 20, 2015 3:45 PM
To: CEQA contact
Subject: FW: GHG Emissions/ ZERO EMISSION THRESHOLD

From: Drude, Kevin [mailto:Kevin@co.santa-barbara.ca.us]
Sent: Friday, March 20, 2015 3:09 PM
To: Molly M. Pearson
Subject: FW: GHG Emissions/ ZERO EMISSION THRESHOLD

Molly,

The comments below are addressed to both the County and the APCD. If I get others so addressed, I'll send them along to you.

Kevin

From: Patricia Hedrick Duncan
Sent: Friday, March 20, 2015 2:46 PM
To: Drude, Kevin; Hedrick Duncan Patricia
Subject: GHG Emissions/ ZERO EMISSION THRESHOLD

To the County of Santa Barbara and Air Pollution Control District (APCD) :

I believe that it is URGENT that Santa Barbara County government adopt the STRICTEST POSSIBLE REGULATIONS to disclose and mitigate greenhouse gas emissions (GHG) from all new projects.

I believe a "ZERO EMISSION THRESHOLD" is imperative at a time when the threat of climate change and severe drought are affecting our environment. (note: Jan, Feb, Mar 2015 - record heat in Santa Barbara)

Most climate scientists (NASA) agree the main cause of the current global warming trend is human caused expansion of greenhouse gases (GHG). Carbon dioxide, methane, nitrous oxide- all are contributing to this expansion.

Santa Barbara is seen by the world to be a community that takes pride in it's beautiful, unique environment. How do we continue this legacy? Let's support a clean and prosperous future by limiting greenhouse gases.

Thank you for your consideration,

Patricia H. Duncan
Solvang, CA

From: Lucila Serra
Sent: Monday, March 23, 2015 4:23 PM
To: CEQA contact
Subject: Fwd: Request for GHG emissions regulation

To whom it may concern,

I am writing to you to request that you support the lowest threshold possible for regulating greenhouse gas emissions from stationary sources. This decision will impact Santa Barbara's ability to regulate GHG emissions for generations to come.

The thresholds being considered differ drastically in their ability to reduce harmful GHG emissions from large sources such as new oil drilling projects.

Thank you,

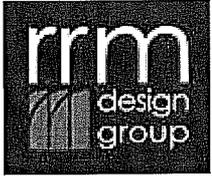
Lucila Serra

Sent from my iPhone

From: Palencia, April W.
Sent: Monday, March 23, 2015 4:25 PM
To: CEQA contact
Subject: GHG emissions

Please make protecting our climate a top priority by setting the lowest threshold possible for GHG emissions from stationary sources.

Thank you,



APRIL PALENCIA, AIA
Project Manager
10 East Figueroa Street, Suite 1
Santa Barbara, CA 93101
(805) 963-8283 x.505

rrmdesign.com

From: tot ton
Sent: Monday, March 23, 2015 5:54 PM
To: dvillalo@co.santa-barbara.ca.us; CEQA contact
Cc: us2-84d39e7e8b-9c684416cc@conversation01.mailchimpapp.com; elyse@cecmail.org
Subject: Please Curb greenhouse emissions

Dear Santa Barbara Planning Commission and Santa Barbara Air Pollution Control District,

With the currently increasing carbon dioxide levels in our atmosphere (300->400ppm/last 100yr), acidifying of the oceans, ocean level rise (3mm/yr), and other hydrocarbon pollution of our environment, please minimize the greenhouse gas emissions allowed from all sources. An exception to this would be to allow newer emergency generators to test regularly for electrical maintenance activities and during real power outages without penalty.

Carbon dioxide & similar molecules act like a blanket to hold more of earth's or man-made heat from escaping into space with an effect of 100 years into the future <http://climate.nasa.gov/>. CO2 used to stay under 300ppm for the last >500,000yrs before 1900. This increase in turn creates the effects we see. Do we really want to change our world at a pace, like heating frogs to a boil from cool water, where we ignore the problems a bit too long for recovery before jumping to a solution?

We do not want to lose business and jobs to other countries or areas that do not implement strong emissions rules, so please give incentives to those who comply and/or penalize businesses and products from outside our area who do not comply. The planet, giving us our health and welfare, needs to be protected.

Thank you,

T. Totton, Goleta, CA

I support the lowest threshold possible for regulating greenhouse gas emissions.

This Wednesday, both the Santa Barbara County Planning Commission and Air Pollution Control District (APCD) will consider options for setting greenhouse gas (GHG) emission thresholds from stationary sources. Their decisions will impact Santa Barbara's ability to regulate GHG emissions for generations to come.

CEC has been working on this issue for several years, and we need your help as both agencies are approaching a final ruling. The thresholds being considered differ drastically in their ability to reduce harmful GHG emissions from large sources such as new oil drilling projects. **Please take a moment to request that both the County and the APCD make protecting our climate a top priority by setting the lowest threshold possible for GHG emissions from stationary sources.**

From: Art Fisher
Sent: Monday, March 23, 2015 5:59 PM
To: CEQA contact
Subject: I support the lowest possible GHG emission threshold...

Lawrence A. Fisher
Carpinteria

From: Katheryn Keller
Sent: Monday, March 23, 2015 6:35 PM
To: CEQA contact
Subject: ! Please curb greenhouse emissions for future generations

I support the lowest threshold possible for regulating greenhouse gas emissions. Please make protecting our climate a top priority by setting the lowest threshold possible for GHG emissions from stationary sources and set a good example for the world to follow!

Thanks,

Katheryn Keller

Santa Barbara, CA. 93103

From: Sandra Castellino
Sent: Monday, March 23, 2015 7:52 PM
To: CEQA contact
Subject: regulating GHG emissions

I'm writing to add my vote for the strongest protection possible for our air by setting the lowest threshold possible for GHG emissions from stationary sources such as oil drilling.

Besides looking out for our health, it is critical to SB as a tourist town which brings in a huge part of its revenue from attracting visitors, that clean air, water, etc. should be a top priority. I moved here 32 years ago because of the environment - the beaches, mountains, clean air and the fact that the 'industry' in SB is so clean - tourism, education, R&D. Please do whatever you can to ensure that continues to be a priority.

Thanks
Sandra Castellino, M.Ed.

From:
Sent: Monday, March 23, 2015 9:00 PM
To: CEQA contact
Subject: GHG emissions

I hereby request that in its upcoming deliberations the APCD make protecting our climate a top priority by setting the lowest threshold possible for GHG emissions from stationary sources.

Susan Shields

Santa Barbara, CA 93105

From: Karen Feeney
Sent: Tuesday, March 24, 2015 7:59 AM
To: CEQA contact
Subject: Regulating Greenhouse Gas Emissions

Good morning. I am sending this email as I am unable to attend the hearing this coming Wednesday. I request that the Community Advisory Council to the Santa Barbara Air Pollution Control District make protecting our climate a top priority by setting the lowest threshold possible for GHG emissions from stationary sources.

With climate changing around the globe, I am concerned for our future generations. The actions you take on Wednesday have the potential to impact the lives of my children and my grandchildren and their children to come. Acting on the local level is the place to start with reducing GHG emissions.

Please make sure your action is a positive and wise one by setting the lowest thresholds possible.

Sincerely,

Karen Feeney

From: Tina Boradiansky
Sent: Tuesday, March 24, 2015 9:51 AM
To: CEQA contact
Subject: air emission standards

Good Morning

I am writing to ask you to adopt extremely stringent new air emission standards. With the President announcing a 40% emission reduction goal this week, and California poised to become a leader in greenhouse reduction plans, Santa Barbara needs to be responsible and do its part to contain emissions that are destabilizing our climate. The science is well established that our local releases will harm the global atmosphere for a very long time and damage our children and grandchildren's futures. Please adopt a NO additional emissions standard. Steam injection oil drilling produces four times the emissions of regular drilling. Please contain this problem while we can.

Thank you

Tina Boradiansky
Resident, Santa Barbara County

From: Patricia Jasper
Sent: Tuesday, March 24, 2015 9:57 AM
To: CEQA contact
Subject: Greenhouse emissions

Thank you for making our environment a priority when deciding about the threshold for emissions from stationary sources. We should be a leader in this area and an example for other counties. PLEASE SET THE LOWEST THRESHOLD POSSIBLE FOR GHG EMISSIONS FROM STATIONARY SOURCES.

From: on behalf of Tam Hunt
Sent: Tuesday, March 24, 2015 10:30 AM
To: CEQA contact
Subject: GHG limits

Hello, I am writing to express my support for APCD setting GHG thresholds for stationary sources at the lowest possible level (the least emissions allowed).

--

Tam Hunt, J.D.
Community Renewable Solutions, LLC

From: Mary Ellen Brooks
Sent: Tuesday, March 24, 2015 11:13 AM
To: CEQA contact
Subject: Public Comment: Hearing on GHG Emissions
Attachments: CPA GHG apcd .doc

Dear STaff: Please include the attached letter in the packet for tomorrow APCD hearing about Greenhouse Gas Emissions Thresholds. I hope to attend the meeting and I plan to speak during Public Comment time.

Regards,
Mary Ellen Brooks
Acting President
Citizens Planning Association.

PS. Could you please respond to this e-mail so I know you received the comment letter.



916 Anacapa Street

Santa Barbara, CA 93101

March 24, 2015

To: Air Pollution Control District Board

Re: Environmental Thresholds and Guideline Manual (GHG Emissions)

Dear APCD Board Members:

The Citizens Planning Association has been a voice for good planning in Santa Barbara County for the past 55 years. We would like to submit the following comments for the hearing on establishing greenhouse gas emissions thresholds.

CPA requests that the APCD board make protecting our climate a top priority by setting the lowest threshold possible for GHG emissions from stationary sources. In the past, CPA has advocated a zero-emission threshold when reviewing such projects as the Santa Maria Energy expansion.

CPA is disappointed that your staff has not included a zero-emissions standard as a choice for the decision-makers. Considering that Santa Barbara is far behind many other counties in California, taking a weak position for these emissions jeopardizes our air quality for generations to come. It also seems to contradict the Governor's mandate on GHG emissions.

It has come to our attention that North County has few monitoring stations in place to measure GHG so this makes it even more important to have the lowest reasonable emission standards.

Thank you for the opportunity to submit these comments.

Respectfully,
Mary Ellen Brooks,
Acting President, CPA

From: jeanholmes
Sent: Tuesday, March 24, 2015 12:28 PM
To: CEQA contact
Subject: CEQA threshold for GHG emissions
Attachments: CEQA Threshold - COUNTY PC 03 25 15.doc

FYI -- Attached and pasted below is the statement made by the Santa Barbara League of Women Voters to the county planning commission on the topic of a CEQA threshold for GHG emissions.

This is possibly a second sending because I submitted via the APCD website yesterday but today received a report that the message was unroutable - sorry for the possible doubling.

-- Jean Holmes

League of Women Voters of Santa Barbara

March 25, 2015

To:, Santa Barbara County Planning Commission
Re: CEQA Threshold for Greenhouse Gas Emissions

The League of Women Voters considers climate change to be an extremely serious problem, one that needs to be attacked by all means possible. Consequently we think a threshold of zero would be ideal. However we recognize that practical considerations may need to be taken into account and we would accept a somewhat higher limit. We have in mind a bright line threshold that would result in the elimination or mitigation of 95% of the county's greenhouse gas emissions from industrial stationary sources. We note that the recommendation of 10,000 MT/year would mean only 82.4% capture or, otherwise stated, the unmitigated release of some 183,000 MT/year. That is too much for a county that prides itself on its environmental record.

Also, the League agrees that the threshold should recognize emissions from all phases of a single project as a single amount.

Almost every day we read of new evidence of the harmful impacts of greenhouse gases. The staff report tells us that the state Air Resources Board estimates the current rate of decline in emissions will have to be several times greater if we are to reach our long term goals. Santa Barbara County should recognize that need and adopt an extremely low threshold of significance for greenhouse gases.

Joanie Jones, co-President

CONTACT: Jean Holmes, jeanholmes@earthlink.net Attached and pasted below

League of Women Voters of Santa Barbara

March 25, 2015

To:, Santa Barbara County Planning Commission
Re: CEQA Threshold for Greenhouse Gas Emissions

The League of Women Voters considers climate change to be an extremely serious problem, one that needs to be attacked by all means possible. Consequently we think a threshold of zero would be ideal. However we recognize that practical considerations may need to be taken into account and we would accept a somewhat higher limit. We have in mind a bright line threshold that would result in the elimination or mitigation of 95% of the county's greenhouse gas emissions from industrial stationary sources. We note that the recommendation of 10,000 MT/year would mean only 82.4% capture or, otherwise stated, the unmitigated release of some 183,000 MT/year. That is too much for a county that prides itself on its environmental record.

Also, the League agrees that the threshold should recognize emissions from all phases of a single project as a single amount.

Almost every day we read of new evidence of the harmful impacts of greenhouse gases. The staff report tells us that the state Air Resources Board estimates the current rate of decline in emissions will have to be several times greater if we are to reach our long term goals. Santa Barbara County should recognize that need and adopt an extremely low threshold of significance for greenhouse gases.

Joanie Jones, co-President

CONTACT: Jean Holmes, jeanholmes@earthlink.net

From: Tana Sommer
Sent: Tuesday, March 24, 2015 1:02 PM
To: CEQA contact
Subject: making it a priority to ensure very limited emissions in SB County

Dear SBAPCD

I am writing to you as a long time supporter of the Community Environmental Council. I strongly urge you to require the lowest threshold of GHG emissions in our county. California is leading the way for the whole USA in improving air quality and not contributing to climate change. Please do not let oil interests and big business sway you into lax standards.

Let's leave our grandchildren a viable world to live in.

Thank you, Tana Sommer-Belin

Santa Barbara, CA 93103

--

From: debbie
Sent: Tuesday, March 24, 2015 1:29 PM
To: CEQA contact
Subject: regulating greenhouse gas emissions

Dear Members of the Air Pollution Control District,

Please make protecting our climate a top priority by setting the lowest threshold possible for GHG emissions from stationary sources.

Thank you!

debra arnesen
santa barbara mother, wife, business person and voter