

**Attachment C – Public Participation**

<b>Topic</b>	<b>Comment/Question</b>	<b>Response</b>
<p><b>Stakeholders Roles</b></p>	<p>There are many success stories in the County which are not recognized. The Study should highlight all the accomplishments which have already been made.</p>	<p>The draft Study provided a list of programs being implemented by the County, but did not recognize accomplishments achieved by individuals and business in the community. Staff has updated the final Study with the addition a few case studies of successful community projects in Section 3.2.5.</p>
	<p>Stakeholders were interested in the role that the regional agencies such as Air Pollution Control District (APCD) and SBCAG play in climate planning.</p>	<p>Section 1.3 which discusses jurisdictional constraints has been expanded to include a discussion of the role and status of activities of SBCAG and APCD.</p>
<p><b>Study Implementation/ Climate Action Plan</b></p>	<p>Public stakeholders requested more information on the economic impact of implementation of the Study.</p>	<p>Staff updated the Study to qualitatively address potential costs associated with developing and implementing a CAP. As described in Section 4.0, the CAP will be developed with funding secured from Southern California Edison. Additionally, the CAP will quantify the associated costs and benefits of implementation of each ERM and recommend ERMs be implemented with an approach of cost effectiveness.</p>
	<p>Many stakeholders were interested in understanding the potential ramifications if the County were not to develop and adopt a CAP.</p>	<p>The draft Study included a discussion of the benefits to developing and implementing a CAP but did not discuss any potential implications of taking no action. The final Study has been updated to clarify that without a CAP in place, each individual project would need to be analyzed for GHG emission under CEQA making the process more burdensome to</p>

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	<p>Many stakeholders, including the County Planning Commission and Montecito Planning Commission, were interested in the details of implementation of many of the ERM's discussed in the Study. Specifically, questions were asked about the timing, procedure, and cost of implementing certain measures.</p>	<p>project applicants.</p> <p>Staff will recommend ERM's for adoption in the CAP through a cost-benefit analysis which will take an approach to economic efficiency. Measures which achieve the greatest reduction for the least cost will be chosen first. Additionally, the CAP will lay out specific details on the procedure to implement each chosen measure including a timeline for implementation. Measures will likely be grouped into tiers for implementation as the County works towards a chosen emission reduction goal. For example, Tier 1 measures will be implemented to meet a 15% target and Tier 2 measures would be implemented after Tier 1 to meet a greater target.</p>
	<p>APCD was concerned that the draft Climate Action Study overly states the value an adopted "climate action plan" has in reducing the need for specific projects to quantify and mitigate GHG emissions under CEQA.</p>	<p>SB 97 allows for the tiering or programmatic mitigation of GHG emissions under CEQA through an adopted CAP that complies with certain criteria as laid out in SB 97. The CAS has been updated to clarify that a CAP does not exempt a project from CEQA or provide analysis for other issue areas. Additionally, there may be instances that a proposed project will not fall within the scope of the CAP and be required to undergo separate CEQA review for GHG emission impacts.</p>
<p><b>AB 32 Scoping Plan Reductions</b></p>	<p>APCD pointed out a discrepancy in the analysis completed in Table 11 as it pertains to the contribution that SB 375 will have towards</p>	<p>The analysis in Table 11 has been updated with data using per capita emissions from passenger vehicles based on daytime service population. While the analysis has been updated, the overall</p>

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	<p>emissions reductions realized in SB County. Specifically they point out that the value in Table 11 is based on an absolute reduction target from SB 375 when it is adopted as a per capita target.</p>	<p>result of an estimated 2.4% reduction from the implementation of SB 375 has not changed.</p>
	<p>It was suggested that the proposed Cap and Trade program, an implementing action of AB 32 and proposed to be implemented through the Western Climate Initiative, be counted towards the reductions the State’s implementing actions will contribute to the County’s reductions.</p>	<p>Cap and Trade has not been included in the State’s contribution to County reductions because it is unknown where actual emission reductions from the program will be realized. Due to the nature of the proposed program, emission credits can be traded from facility to facility in the program area which could be the State of California or a larger region under the Western Climate Initiative which includes portions of Canada and other western states. As such, facilities in the County could trade credits with a facility elsewhere and the reductions would actually occur in another jurisdiction.</p>
<p><b>GHG Emissions Inventory and Forecast</b></p>	<p>Stakeholders were concerned that the growth forecast for jobs and employment used to forecast GHG emissions was inaccurate given the state of the economy.</p>	<p>Staff has revised the final Study to include clarifications on the data and assumptions used to complete the GHG emissions forecast. The forecast of GHG emissions are based on SBCAG’s Regional Growth Forecast for 2005 – 2040 (RGF2007) and incorporates information from other sources such as Census 2000 data, California Department of Finance data, and Employment Development Department data. Additionally, the County modified the RGF2007 population and jobs data for</p>

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	<p>It was suggested that the County consider using the trend from the 1990 and 2007 top down inventories to extrapolate a second 1990 inventory off of the 2007 detailed inventory and use that as the basis for a County emission reduction target.</p>	<p>2007. This adjusted baseline was then used to prepare the forecasts.</p> <p>The Study discusses that the data used to create both top down inventories is not nearly as precise or accurate as the data for the 2007 detailed inventory. The 2007 detailed inventory uses observed data such as electricity and fuel use data to quantify emissions. The top down method extrapolates from state level data, which is much less precise. For this reason, the Study focuses its analysis off of the 2007 detailed inventory.</p> <p>Analysis of the two different 2007 inventories illustrates the inaccuracies of the top down methodology. Particularly, the top down industrial inventory is 31% lower than the detailed one and for commercial the difference is 68%. Based on that information, the top down method appears to be highly inaccurate for the unincorporated County and drawing any conclusions about trends is questionable.</p>