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Sheila de la Guerra **Public Comment**

From: relias@pacificagritec.com
Sent: Monday, August 26, 2024 5:00 PM
To: sbcob
Subject: Comment Letter 2030 Climate Action Plan and EIR
Attachments: 20240826 BOS-LULAC CAP Submittal re.pdf

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Attached please find the subject comment letter submitted by the League of United Latin American Citizens.

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LEAGUE OF UNITED LATIN
AMERICAN CITIZENS
Council 3252
Santa Maria CA

August 26, 2024

To: The Santa Barbara County Board of Supervisors
From: The State and Santa Maria Council 3252 of the League of United Latin American Citizens (LULAC)
RE: Reply to County Responses Regarding Affordable Housing and Transportation Elements Ignored by the Proposed 2030 Climate Action Plan (CAP) and EIR

County P&D staff has chosen to disregard the concerns expressed in our letter dated June 27, 2023, based on paragraph (a) of the Cal. Code Regs. Tit. 14 § 15131 saying, “economic or social effects of a project shall not be treated as a significant effect on the environment” thereby not requiring formal economic and social impacts analyses.

We apologize for not being clearer on the matter. We did not mean to suggest treating economic and social impacts as a significant effect on the environment. We refer you to Tit. 14 § 15131 paragraph (b) instead. It says economic or social effects may be used to determine the significance of physical changes caused by the project. Here, economic and social effects are associated with County specified GHG mitigation measures that determine the significance of climate change.

U.S. census information says that 29% of the Santa Barbara County population is living with severe housing problems because of low-income constraints; 14% live below the poverty line. Focused analyses say that economic and social effects experienced by residents with low financial capacity will be affected by GHG mitigation efforts more pronouncedly and disproportionately than average or high-income residents. A few simplified examples are given below.

A low-income household having to purchase an EV to help curb GHG’s is impacted more economically, than a high-income household purchasing the same car. Conversely, a low-income household purchasing a smaller and more affordable EV that doesn’t accommodate their entire household experiences a social effect. The purchase of a used EV that includes risks associated with costly battery replacement, known high voltage shock hazards, and releases of toxic and flammable gases can be an economic and social effect.

With regard to housing, most economically challenged households cannot afford the cost of moving into new affordable housing, nor can they afford the cost associated with electrification upgrades and appliance replacements like average and high-income households.

These economic and social examples reflect relative significance within community sectors in the County. In essence, the proposed GHG mitigation plan causes lower income households to experience more difficulties involving greater economic and social effects than higher income

residents. Those measurable and significant differences also signify inequities and would be construed as a violation of California environmental justice law.

Compounding the problem further is the fact that low income and marginalized segments of the community also include thousands of agricultural workers who live and work in the County. In aggregate, these challenged community groups make up a very large percentage of the County population. Expected higher costs and more difficult lifestyle changes associated with the transition to a carbon-free County will increase their struggles to secure adequate housing, transportation, and other life necessities far more than the average or high-income resident. Comprehensive considerations and guidelines that address these inequities are lacking.

Lastly, it is a waste of taxpayer dollars and County resources to devise what in effect is a contingent natural gas curtailment plan in the proposed EIR and CAP because of acknowledged and unresolved judicial outcomes. Applicable State and National laws are already in place. We see no need to discourage or further restrict the use of natural gas or gasoline without obtaining the concurrence of County residents. Our informal membership contacts say doing more than what is already promulgated is not supported by the community as a whole.

Obviously, the full intent and foresight of CEQA is not being honored in the documents set before the Board of Supervisors. Additionally, California Environmental Justice Law is being usurped. It prescribes equitable consideration and the fair treatment of all marginalized races, cultures, incomes, and national origins with respect to development, adoption, implementation, and enforcement of environmental regulations and policies within our community GOV § 65040.12 (e)(1). Therefore, the proposed EIR and 2030 Climate Action Plan require further analyses. For these reasons LULAC insists that the County reconsider their reply to our letter dated June 27, 2023, and address our concerns without prejudice.

Our LULAC national organization was founded in 1929 and consists of over 265,000 members and supporters. We are committed to improving the economic condition, educational attainment, political influence, housing, health, and civil rights of the U.S. Hispanic population as well as low income and marginalized households. We implore the Santa Barbara County Board of Supervisors to do likewise and not approve the proposed EIR and CAP as written.

Thank You,

Ramon Elias

Member, Santa Maria LULAC Council 3252

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