

Ramirez, Angelica

Public Comment

#2

From: Thomas Becker <lesdeplorable7@gmail.com>
Sent: Monday, January 25, 2021 10:55 AM
To: sbcob; Kubran, Michelle@Coastal; Michael Becker
Subject: Public comment, Agenda item #2, Santa Barbara County Board of Supervisors meeting, January 26, 2021

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To add to my previous comments:

This agenda item is to set interim GHG thresholds for GHG impact analysis for future developments. One threshold is 300 tons of GHG per year for projects. In short, if a project is determined not to cause or produce more than 300 tons of GHG per year, it's impacts are considered by County P&D to be "insignificant" and is exempt from further analysis and controls.

However, California Coastal Act 30253(4) and County CLUP 3.11.1 clearly states that new projects located in the coastal zone "shall minimize" GHG inducing VMT and energy consumption. This means that a proposed project located in the coastal zone must reduce GHG inducing VMT and energy consumption to the greatest extent feasible, even if the project's GHG impact is below what County P&D considers 'insignificant', such as the 300 tons/year threshold..

Currently, County P&D is arguing before the California Coastal Commission that County CLUP 3.11.1 and Coastal Act 30253(4) exempts projects located in the coastal zone from GHG impact analysis if the project has "no significant" GHG inducing VMT and energy impacts. If the Coastal Commission accepts the County's position, then it will be legally impossible to reduce GHG impacts from projects located in the coastal zone to below the "less than significant", "no significant" or "insignificant" thresholds, even when there are feasible alternatives and mitigations that can achieve large reductions in GHG impacts from those projects.

As can be seen, County P&D's position that projects in the coastal zone can be allowed to produce greater amounts of GHG than what feasible alternatives and mitigations can reduce will have devastating impacts on Coastal Act policies and regulations that were written, planned and intended to provide greater environmental protections than CEQA and other state and local policies, rules, regulations and statutes.

Thank you
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