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September 1st, 2011

Chair Gray and Members of the Board of Supervisors
County of Santa Barbara
105 E. Anapamu Street
Santa Barbara, CA 93101

RE: Adoption of Climate Action Plan, Agenda item #8

Dear Chair Gray and members of the Board,

The Community Environmental Council (CEC) appreciates the opportunity to comment on the County of Santa Barbara’s draft Climate Action Study. Over the years, we have followed and assisted with the County’s climate action planning. We have also worked with County staff on various early action measures such as the Calle Real Solar Project, energy efficiency measures through the SCEEP partnership, and applying for free electric vehicle charging stations. These recent projects have reduced the County’s environmental impact, while saving the County money.

CEC Supports Development of a Strong Climate Action Plan

CEC strongly supports continued development of a Climate Action Plan (CAP), and urges the CAP to consider an aggressive and achievable target that will continue the County’s environmental leadership. In addition to the significant environmental benefits that will result from the CAP, proposed emission reduction measures such as increasing energy efficiency, building renewable energy, and improving transportation will save the County considerable money over time. One recent example is the Laguna Sanitation District’s 1.2 megawatt solar project, which is reported in the Santa Maria Times to save the District \$14 million over the life of the project.¹

As noted in the Draft Climate Action Strategy, 58 California jurisdictions have already adopted a Climate Action Plan, 50 jurisdictions have adopted community-wide greenhouse gas reduction targets, and 269 jurisdictions have adopted, or are in the process of drafting policies and/or programs to address climate change and /or to reduce GHG emissions, including the City and County of San Luis Obispo, the County of Ventura, the City of Santa Barbara and the City of Goleta.

In March of 2009, the Board of Supervisors passed BOS Resolution 09-059, which directed County staff to “take immediate, cost effective, and coordinated steps to reduce the County’s collective GHG emissions”. While some progress has been made, CEC is concerned that today, two and a half years later, the County has only produced a draft Climate Action Study. Furthermore, the County estimates that the Climate Action Plan will not be

Printed on 100% recycled paper ¹ Santa Maria Times, May 25, 2011 “Sanitation District Launches Solar Project.” Available at http://santamariatimes.com/news/local/govt-and-politics/article_d557aa58-8694-11e0-9702-001cc4c03286.html



completed until summer of 2013. If all goes well, it will have taken four and a half years from board resolution to a plan. With energy prices continuing to rise and the planet continuing to warm, this type of delay is unacceptable. We urge you to act today to prevent further delay.

Climate Action Plan Target

The staff report identifies three possible emission reduction targets. The first is a reduction of 15 percent from 2007 emissions by 2020, with other scenarios of 13.3 percent and 20 percent. CEC encourages the Board to direct the Climate Action Plan to set a target of 20 percent or greater, with our preference being at least a 30 percent reduction in emissions from 2007. This is an achievable target due to various factors discussed in the staff report:

- The State of California AB 32 scoping plan already accomplishes 13.3 percent of the targeted reductions
- The California Air Resources Board updated 2020 forecast, referenced in the staff report, shows that due to the severe and protracted economic recession, the 2020 forecasted emissions dropped by nine percent from 596 million metric tons to 545 million metric tons, statewide.²
- The County of Santa Barbara is growing much slower than other counties in the state. Thus, to accept a target of 15 percent means our county would be doing much less to meet state goals than other, faster growing counties.

Due to the State's scoping plan target of 13.3 percent, along with the 9 percent drop in forecasted emissions, a 20 percent target will likely be easily exceeded with no work on our part, and a 30 percent or higher target is achievable and more benefitting of our status as an environmental leader.

It is important to note that many other cities and counties are also considering a more aggressive target, and these policies were set in the past few years, before the new 2020 forecast that considered the recession was developed. For example, the County of Contra Costa has set a municipal target of 50 percent below current emission levels by 2030. The City of Los Angeles has set a target of 35 percent below 1990 levels by 2030, and the City of Santa Cruz has set a target of 30 percent below 2005 levels by 2020.³ The City of Portland's target is 40 percent below 2008 levels by 2030, and these reductions are planned on top of the 15 percent reduction the City has already accomplished between 2000 and 2008.

There is also ample evidence from our local community that shows a commitment to reducing carbon emissions and costs. The City of Santa Barbara's 2010 Sustainable Santa Barbara report⁴ shows

² California Air Resources Board "Status of Scoping Plan Recommended Measures" available at http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf

³ State of California, Office of Planning and Research November 10, 2010 "Cities and Counties Addressing Climate Change." Available at http://www.opr.ca.gov/ceqa/pdfs/City_and_County_Plans_Addressing_Climate_Change.pdf

⁴ City of Santa Barbara "2010 Sustainability Achievement report" available at http://www.santabarbaraca.gov/Documents/Sustainable_Santa_Barbara/In_the_News/00_Annual_Report/2010-01-01_2010_Sustainability_Achievement_Report.pdf



municipal emissions have dropped 11 percent from 1990 levels. During this May's County Planning Commission meeting on this topic, Marborg submitted their certified results showing how they have decreased their emissions 19 percent in the three years between 2007 and 2010.

Furthermore, the County of Santa Barbara is already undertaking large projects that will substantially reduce the County's carbon emissions, such as the large solar projects at Laguna Sanitation District and the Calle Real Campus, numerous energy efficiency retrofits, and the new ozone laundry system at the County Jail.

CEQA Benefits

An addition benefit to developing a Climate Action Plan is that SB 97 allows for public agencies to analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level as part of an adopted CAP. If the County analyses GHG emissions at a programmatic level, it removes the burden and cost of quantifying and analyzing GHG emission under CEQA for some project applicants.

Conclusion

The Community Environmental Council strongly supports the development of a Climate Action Plan, in conjunction with the adoption of early action measures such as the County's recent solar projects. 58 California jurisdictions have already adopted plans, and 269 have adopted or are in process of adopting policies to address climate change. Due to the State's AB 32 actions, along with the reduced forecasted emissions due to the recession, the County's CAP should consider a target of 30 percent or higher reduction from 2007 levels by 2020. An adopted CAP will help lower long term operational costs, reduce the County's GHG emissions, and assist project applicants by addressing the County's GHG emissions at a programmatic level.

CEC is ready to assist the County with the CAP and in completing excellent projects. We hope that the Board of Supervisors will vote to develop a strong Climate Action Plan.

Sincerely,

Handwritten signature of Dave Davis in black ink.

Dave Davis, Executive Director

Handwritten signature of Michael Chiacos in black ink.

Michael Chiacos, Transportation Specialist