

Ramirez, Angelica

Public Comment

**From:** Linda Krop <lkrop@environmentaldefensecenter.org>  
**Sent:** Friday, March 20, 2020 11:46 AM  
**To:** sbcob  
**Cc:** Plowman, Lisa; Klemann, Daniel; Tara Messing; Brian Trautwein; Miyasato, Mona  
**Subject:** EDC Testimony re Long Range Planning Division FY 2020-2023 Work Program (BOS Agenda Item 3)  
**Attachments:** EDC Testimony re 2020\_2023 Work Program\_2020\_03\_20\_FINAL.pdf

LA, DIS,

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Dear Clerk of the Board,  
 Please accept and distribute the Environmental Defense Center’s testimony regarding the Long Range Planning Division’s FY 2020-2023 Work Plan, which is scheduled for hearing next Tuesday.  
 Thank you for your assistance,  
 LK

LINDA KROP  
 CHIEF COUNSEL  
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environmental

**From:** Linda Krop  
**Sent:** Thursday, March 19, 2020 2:32 PM



# 3

LATE  
DIST

March 20, 2020

Chairman Gregg Hart  
Santa Barbara County Board of Supervisors  
105 E. Anapamu Street  
Santa Barbara, CA 93101

**Re: EDC Testimony Regarding the FY 2020-2023 Work Program for the Long-Range Planning Division**

Dear Chair Hart and Supervisors,

This testimony summarizes the written comments submitted by the Environmental Defense Center regarding the Long-Range Planning Division's FY 2020-2023 Work Program.

First, we continue to urge the County to adopt an ordinance mandating that onshore oil and gas operators retain liability upon a transfer of assets. This ordinance would be similar to state and federal regulations for offshore oil development, would only affect facilities under the County's jurisdiction, and would ensure that the costs of remediation and abandonment do not fall to taxpayers.

Second, we urge the County to expand its existing Change of Owner or Operator Ordinance to apply to onshore oil and gas development. This change will help the County ensure that new owners and operators will comply with financial obligations, safety requirements, all applicable permits and regulations, and liabilities.

Third, we request that the County's CEQA Environmental Thresholds and Guidelines Manual be amended to require **local** mitigation for GHG emissions. Other provisions in the Manual include specific mitigation requirements. Imposing requirements for local GHG mitigation will achieve local benefits for County residents, and will ensure verifiable quantification of mitigation measures, accurate monitoring, and enforcement.

Finally, EDC supports the following projects identified in the Work Program: (1) update the Energy and Climate Action Plan; (2) develop a utility grade solar ordinance; (3) update the Conservation Element; and (4) develop an Environmental Justice Element.

March 20, 2020

EDC Comments on Long Range Planning Division Work Program FY 2020-2023

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To meet all of these demands, we support the recommendation for additional staffing in the Long Range Planning Division.

Thank you for your consideration.

Sincerely,

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

Linda Krop  
Chief Counsel