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Public Comment

Ramirez, Angelica

From: Linda Krop <lkrop@environmentaldefensecenter.org>
Sent: Thursday, March 19, 2020 2:32 PM
To: sbcob
Cc: Plowman, Lisa; Klemann, Daniel; Tara Messing; Brian Trautwein; Miyasato, Mona
Subject: Long Range Planning Division FY 2020-2023 Work Program (BOS Agenda Item 3)
Attachments: Comments on 2020_2023 Work Program_2020_03_19_FINAL.pdf

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Dear Clerk of the Board,

Please file and distribute the attached letter from the Environmental Defense Center regarding the Long Range Planning Division FY 2020-2023 Work Program.

Thank you,
Linda Krop



March 19, 2020

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

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

Dear Chair Hart and Supervisors,

The following comments are submitted by the Environmental Defense Center (“EDC”) regarding the County of Santa Barbara’s (“County”) Long-Range Planning Division’s Work Program for Fiscal Year 2020-2023. EDC is a non-profit, public interest law firm that protects and enhances the environment in Santa Barbara, Ventura, and San Luis Obispo Counties through education, advocacy, and legal action.

EDC has identified three projects that we urge the Board of Supervisors to adopt as part of the Fiscal Year 2020-2023 Work Program. First, we reiterate our request that the County adopt an ordinance mandating that onshore oil and gas operators retain liability upon a transfer of assets.¹ This ordinance would be similar to state and federal regulations for offshore oil development. As we continue to see more oil operators shield themselves from cleanup costs through bankruptcy proceedings, the County must put protections in place to ensure that these often outrageous costs do not fall onto taxpayers.

Second, the County’s existing Change of Owner or Operator Ordinance under Chapter 25B of the County’s Code of Ordinances must be expanded to apply to onshore oil and gas development. At present, the ordinance only applies to certain oil and gas facilities primarily related to offshore oil development. Transfers of onshore facilities also generate major issues pertaining to financial obligations, safety of operations, ability to comply with all applicable permits and regulations, and liabilities. Clear guidelines for applicants, the County, and the

¹ The County’s ordinance would apply to facilities under the County’s jurisdiction, and would exclude facilities under the jurisdiction of another agency, such as CalGEM.

public are critical to ensure complete and timely review of proposals to change the owner or operator of oil and gas facilities.

Third, we request that the County's California Environmental Quality Act ("CEQA") Environmental Thresholds and Guidelines Manual be amended to require **local** mitigation for greenhouse gas ("GHG") emissions. The Manual does not include any mitigation requirements for GHG emissions even though other provisions in the Manual set forth very specific mitigation guidance and/or requirements. Imposing requirements for local GHG mitigation efforts will achieve additional local benefits important to County residents. Such a requirement will also ensure verifiable quantification of mitigation measures, monitoring, and enforcement.

Finally, EDC advocates for the prioritization of the following projects identified in the FY 2020-2023 Work Program: (1) update the Energy and Climate Action Plan ("ECAP"), especially given the Board's recent direction to staff to update the GHG emission reduction target to 50 percent of 1990 levels by 2030; (2) develop a utility grade solar ordinance to help stimulate renewable energy development, meet state and local GHG emission reduction goals, and improve the resiliency of the local electric grid; (3) update the Conservation Element of the Comprehensive Plan; and (4) develop an Environmental Justice Element. To meet all of these demands, we support the recommendation for additional staffing in the Long Range Planning Division.

Thank you very much for your consideration.

Sincerely,



Linda Krop
Chief Counsel