

Attachment D

Local Jurisdiction Oil & Gas Actions

In order to have a CEQA-qualified CAP, the County needs to make meaningful progress toward reducing emissions within its jurisdiction. Because they are not included in the CAP or associated EIR, new stationary sources or oil and gas operations would be required to conduct their own CEQA greenhouse gas analysis, not rely on the CAP or the CAP EIR.

Emissions from stationary sources are included here as an informational item but are not included in the County's emission reduction goals. Regulations affecting existing oil and gas operations are emergent and evolving. In addition to implementing the CAP, the County will continue to seek opportunities and pathways to reduce emissions from stationary sources in ways that are technically, legally, and economically viable.

Santa Barbara County				
Stationary Source Emissions - Summary				
	2008	2016	2018	2022
Electricity Generation	32,341	13,579	15,313	
Oil and Gas Production	387,525	116,799	122,987	123,905
Other Combustion Source	56,496	113,552	36,170	110,291
Refinery	16,266	23,277	15,218	0
TOTAL	492,628	267,207	189,688	234,196

Source: CA Air Resources Board

Below is a table showing the top 10 oil-producing counties, the status of their CAP and whether or not oil and gas has been included.

County / Oil Production Rank	Climate Action Plan	Oil & Gas Included?
Kern, #1	No	N/A
Los Angeles, #2	2024 Draft	Yes
Fresno, #3	2024 Adopted	Maybe, Industrial energy
Ventura, #4	2020 General Plan	Yes, but not a CEQA qualified CAP
Monterey, #5	2022 Draft	No
Santa Barbara, #6	2024 Draft	No
Orange, #7	No	N/A
San Joaquin, #8	2008 Adopted by SJVAPCD	No
San Luis Obispo, #9	No	N/A
Butte, #10	2021 Adopted	No

The 2030 CAP, and the County’s emissions reduction targets, currently does not include oil and gas operations (broadly categorized under stationary sources). The County does have some discretion with permitting new oil and gas operations. The Board adopted a GHG threshold of significance of 1,000 metric tons of CO2e for stationary sources to be applied to new projects under development review. New oil and gas projects would be well over the threshold, and would have to include measures to mitigate or offset their projected emissions to a less than significant level, or remain a significant impact and require the decision-maker to adopt a statement of overriding consideration in order to approve the project.

Regulations affecting existing oil and gas operations are emergent and evolving. Below are examples of actions local jurisdictions have recently taken to address existing oil and gas operations.

Examples from Other Jurisdictions

Ventura County

The County of Ventura updated and adopted its General Plan in 2020. Stationary sources were identified and included in the County’s inventory and forecast (Figure B-1 and Table B-4). The County adopted policies regulating oil trucking, piping and flaring. The “Climate Action Plan” component of the General Plan was not designed to be CEQA-qualified.

Figure B-1 2015 Greenhouse Gas Emissions in Unincorporated Ventura County, by Sector

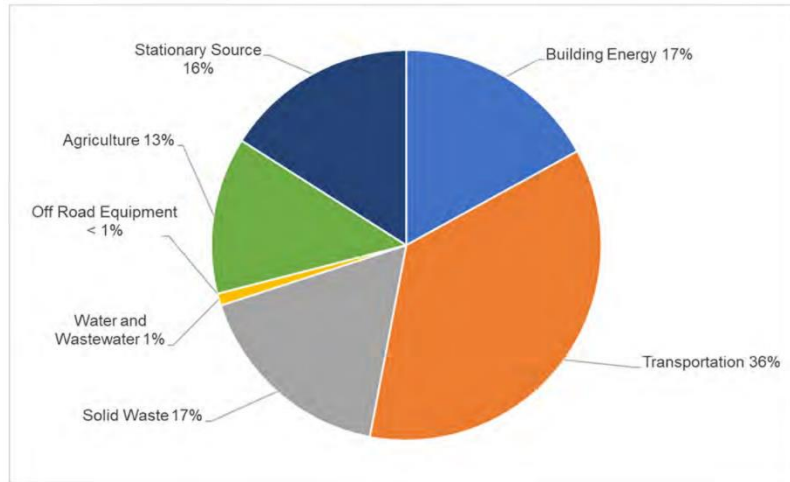


Table B-4 “Business as Usual” Greenhouse Gas Emissions Forecast for Unincorporated Ventura County (MT CO2e)

Sector	2015	2020	2030	2040	2050
Transportation	692,753	704,364	727,433	750,452	773,467
Building Energy	322,048	323,803	334,079	343,129	354,565
Solid Waste	333,167	338,221	334,763	306,366	280,798
Stationary Sources	317,222	245,340	198,432	160,660	130,212
Agricultural	260,849	256,223	248,882	241,541	234,200
Water and Wastewater	13,148	13,420	13,576	13,699	13,788
Off-road Equipment	52	52	54	56	59
Total BAU Emissions (all sectors)	1,939,238	1,881,423	1,857,220	1,815,904	1,787,089
Percent Change from 2015 Baseline		3.0	4.2	6.4	7.8

Notes: Columns may not add to totals due to rounding. MT CO2e = metric tons carbon dioxide equivalent, BAU = business as usual
 Source: Ventura County 2040 General Plan Final EIR.

The month after the new General Plan’s approval, 10 lawsuits were filed challenging the document.

According to the staff report for the Feb. 1 meeting, “the lawsuits primarily alleged violations of (California Environmental Quality Act), the Brown Act, state planning law, state and federal preemption, and some allege the County’s unconstitutional taking of property rights and other constitutional violations.”

As of February 2024, the County has resolved two of these 10 lawsuits by entering into settlement agreements with petitioners: Ventura County Coalition of Labor, Agriculture, and Business (CoLAB) and

the Ventura County Agricultural Association (VCAA), and the California Works Labor-Management Cooperation Trust (CalWorks). The eight remaining lawsuits were filed against the County by a coalition of royalty owners, economic organizations, and petitioners with interests in the Ventura County oil and gas industry including Aera Energy LLC, Western States Petroleum Association, Lloyd Properties, Carbon California Operating Company LLC, CalNRG, the National Association of Royalty Owners, as well as individual property and royalty owners. The existing policies at issue, as approved in 2020 are:

- Policy COS-7.7: Conveyance for Oil and Produced Water. The County shall require new discretionary oil wells to use pipelines to convey oil and produced water; oil and produced water shall not be trucked.
- Policy COS-7.8: Gas Collection, Use, and Disposal. The County shall require that gases emitted from all new discretionary oil and gas wells shall Planning Commission Staff Report February be collected and used or removed for sale or proper disposal. Flaring or venting shall only be allowed in cases of emergency or for testing purposes.

The agreed upon changes to be included pursuant to the settlement agreement read as follows:

- Policy COS-7.7: Limited Conveyance for Oil and Produced Water. The County shall require new discretionary oil wells to use pipelines to convey crude oil and produced water, if feasible. Trucking of crude oil and produced water may only be allowed if the proponent demonstrates that conveying the oil and produced water via pipeline is infeasible. In addition, trucking of crude oil and produced water is allowed in cases of emergency and for testing purposes consistent with federal, state and local regulations.
- Policy COS-7.8: Limited Gas Collection, Use, and Disposal. The County shall require that gases emitted from all new discretionary oil and gas wells be collected and used or removed for sale or proper disposal, if feasible. Flaring or venting may only be allowed if the proponent demonstrates that conducting operations without flaring or venting is infeasible. In addition, flaring or venting is allowed in cases of emergency and for testing purposes consistent with federal, state, and local regulations.

Culver City

In 2018, the City commissioned an amortization study to assess the economic value and returns of existing oil wells to determine if operators had fully recouped their investment costs.

In 2021, Culver City Council, by a vote of 3 - 1, with one abstention, adopted the Oil Termination Ordinance to: (1) prohibit any new or expanded oil and gas activity (such as the drilling of new wells, the redrilling or deepening of existing wells, or erecting any derrick, structure or equipment related to oil or gas production), except as required to facilitate termination of the nonconforming oil uses and existing oil and gas activities and operations allowed to continue until termination; and (2) terminate all nonconforming oil uses within the City over a five-year period ending November 24, 2026.

In 2023, the Culver City and Sentinel Peak Resources California LLC executed a Settlement Agreement to resolve Sentinel's potential legal claims relating to the Ordinance, including the following:

- Sentinel must plug and abandon a minimum of 15 wells by December 31, 2027, at a rate of a minimum of three wells per calendar year over the five-year period between 2023-2027.
- Sentinel must plug and abandon all remaining wells and complete the overall closure ("Termination") of the City IOF by December 31, 2029.
- After December 31, 2027, extension may be conditionally authorized under special circumstances, but not to extend beyond December 31, 2032

Culver City does not have a Climate Action Plan.

Los Angeles County

In 2019, LA County adopted OurCounty Sustainability Plan, which calls for the development of a sunset strategy for oil and gas operations.

In 2022, LA County adopted an ordinance banning new oil wells and production facilities in unincorporated areas, while ordering the phase-out of existing operations over the next 20 years.

In 2024, LA County released a revised draft Climate Action Plan. The CAP's inventory, emissions forecast and reduction goals includes Stationary Energy which includes emissions from energy use (natural gas and electricity) in residential, commercial/ institutional/agricultural, and manufacturing/industrial buildings, energy generation facilities owned by the County, off-road equipment, and fossil fuel extraction (Figure 2-1 and Figure 3-1).

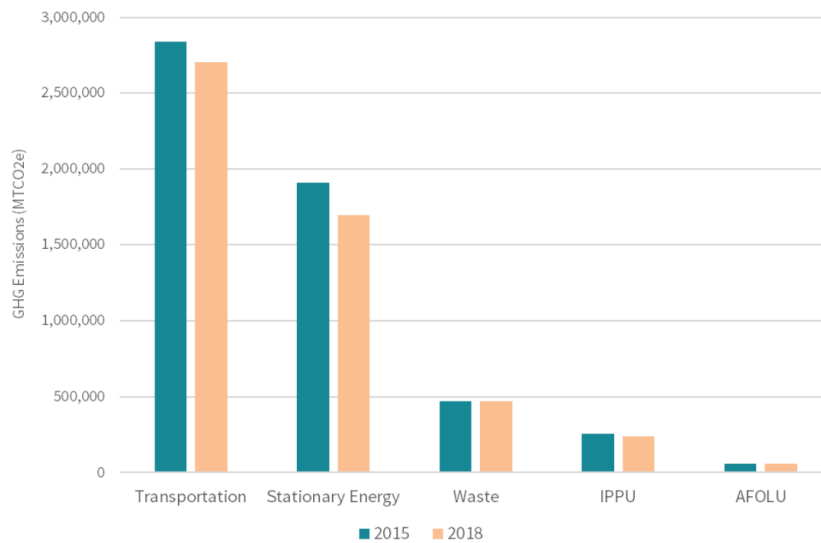


Figure 2-1: 2015 and 2018 Greenhouse Gas Emissions by Sector
 Source: Appendix A: Greenhouse Gas Accounting, Business-as-Usual Forecast, and Emission Reduction Targets.

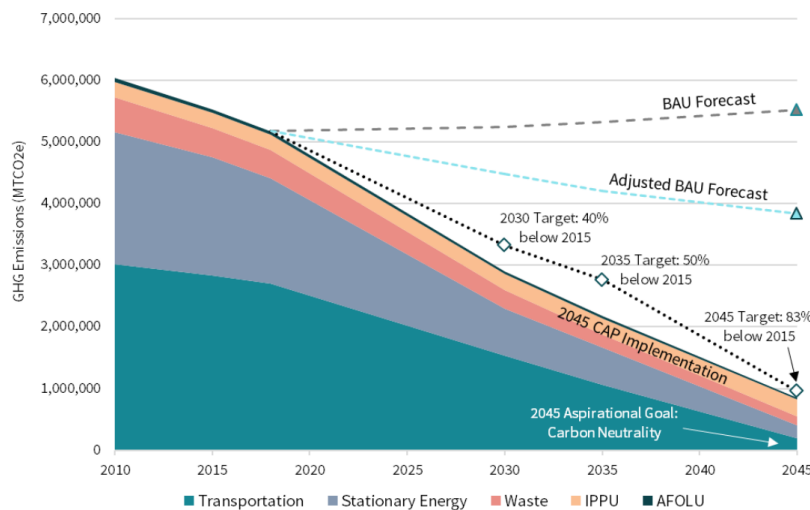


Figure 3-1: Communitywide Greenhouse Gas Emissions Forecasts with 2045 Climate Action Plan Implementation
 Source: Appendix B: Emissions Forecasting and Reduction Methods.

Measure ES1 calls for the County to “develop a sunset strategy for all oil and gas operations that prioritizes disproportionately affected communities and develop a strategy for carbon removal.”

Sub actions include:

- ES1.1—Collaborate with other local jurisdictions and utilities to develop a sunset strategy for all oil and gas operations that prioritizes disproportionately affected communities. Develop an ordinance.
- ES1.2—Develop a policy that requires the examination of all active, idle, and abandoned oil wells for fugitive emissions of GHGs. Coordinate with federal and state agencies conducting fugitive emissions data.

- ES1.3—Develop a carbon removal strategy, including direct air capture and carbon capture and sequestration (CCS).

The County's assumptions are that Measure ES1 will reduce fugitive emissions from oil and natural gas systems linearly with the measure's overall performance objectives for each future year.

The County's CAP includes a Consistency Checklist which requires projects that include existing active and abandoned oil wells to "examine all wells for fugitive emissions of methane. Reduce such existing emissions by a minimum of 80%."