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Katherine Douglas *Public Comment - Multiple Agencies*

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**From:** Katie Davis <kdavis2468@gmail.com>  
**Sent:** Thursday, August 22, 2024 5:28 PM  
**To:** sbcob  
**Subject:** August 27 - Agenda Item #2: Climate Action Plan  
**Attachments:** CAP Sign On Letter 2024 Final.pdf

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Please see attached letter signed by 25 organizations regarding the climate action plan.



August 21, 2024

Santa Barbara County Supervisors  
 105 East Anapamu Street, 4th Floor  
 Santa Barbara 93101  
 Via email: sbcob@countyofsb.org

**RE: 2030 Climate Action Plan**

Dear Santa Barbara County Supervisors,

We the undersigned representing thousands of County residents thank you for considering the updated Climate Action Plan (CAP), which outlines actions we can take to help meet the goal of reducing greenhouse gas emissions by 50% by 2030.

However, there is a significant omission: The greenhouse gas (GHG) inventory excludes emissions from oil and gas facilities. We are writing to ask you to direct staff to include these emissions in the GHG inventory.

The [draft CAP](#) states that these stationary source emissions from oil and gas facilities are, "excluded because the County lacks primary regulatory control over many of these facilities." (pg 22)

This is not an adequate rationale for exclusion because:

1. A GHG inventory should include all emissions, not just ones the County directly controls. The protocols for community GHG inventories are broad. For instance, *"Any physical process inside the jurisdictional boundary that releases GHG emissions into the atmosphere"* ([ICLEI US Community GHG Protocols](#) pg 15) or *"emissions occurring as a result of activities and consumption patterns of the city"* ([Global Protocol for Community-Scale Greenhouse Gas Inventories](#), pg 29) CEQA Guidelines section 15183.5(a) requires that plans to reduce GHG emissions should *"Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area."*
2. To comply with CEQA, the inventory must be complete. For instance, in *California Riverwatch vs. County of Sonoma*, the court found that Sonoma County's CAP violated CEQA in part because the "inventory of greenhouse gas emissions is based on insufficient information."
3. The fact that there are State or Federal regulations that apply to the operation of these facilities does not negate the County's ability to control emissions from their operation through its permitting authority. If emission sources the County primarily controls were the only ones included, there would be virtually no GHG inventory at all.

In fact, the CAP itself recognizes that the County influences these emissions. Page 40 of the CAP says, "The County does have a role to play in overseeing the oil and gas operations within its jurisdiction." And on page 41 it gives examples of what the County and City of Los Angeles are doing to phase out oil. Another example is Ventura County which requires electrification and prohibits venting and flaring of gas if feasible -- regulations that survived settlement with the oil industry and that will lower GHG emissions in the oil and gas sector.

Santa Barbara County regulates and permits oil and gas facilities. The County set a GHG threshold of significance of 1,000 metric tons CO<sub>2</sub>e and has considered emissions in permitting decisions. At the Board of Supervisors meeting on June 27, 2023 when the draft Climate Action Plan was last discussed, there was unanimous agreement that County actions have led to a decline in emissions from the sector.

The exclusion of oil and gas emissions is a continuing omission dating back to the 2015 Climate Plan that enables the County to avoid considering industry emissions, but it provides a false picture of GHG emissions in the County. Our long-awaited 2030 Climate Plan should be both ambitious and accurate. As the UN's International Panel on Climate Change [reports](#), "The evidence is clear: the time for action is now. We can halve emissions by 2030...The next few years are critical." At this critical juncture, continuing to exclude and ignore a major GHG emissions source in the County is not acceptable.



Failing to include these emissions also makes the CAP non-CEQA compliant. Any county project that tries to rely on consistency with the CAP could be challenged based on this omission. This will unnecessarily delay and handicap climate actions and makes the time and expense spent on the CAP CEQA compliance thus far a waste.

Please direct staff to include emissions from oil and gas production and processing in the GHG inventory in the 2030 Climate Action Plan and mitigation measures before it can be approved.

Regards,

Katie Davis  
Chair, Sierra Club Santa Barbara-Ventura Chapter  
Vice-Chair, Sierra Club California

Linda Krop  
Chief Counsel  
Environmental Defense Center (EDC)

Sigrid Wright  
CEO/Executive Director  
Community Environmental Council

Haley Ehlers  
Executive Director  
Climate First: Replacing Oil & Gas (CFROG)

Mati Waiya  
Executive Director  
Wishtoyo Foundation

Gabriel Frausto  
Chairman  
Coastal Band of the Chumash Nation

Mia Lopez, Coastal Chumash Member  
Cultural Educator & Cultural Resource Protector  
Chair, AIHS Board  
Member, SBTHP  
Cultural Support, UCSB AIISA  
Founding Director, Su'nan a.k.a. The SPACE

Emiliano Campobello  
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Santa Barbara Standing Rock Coalition

Carla Mena  
Director of Policy & Legislative Affairs  
Los Padres ForestWatch

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Central Coast Alliance United for a Sustainable Economy (CAUSE)

Craig Lewis  
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Clean Coalition

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350 Santa Barbara

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Co-chair  
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Wayne Morgan  
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Climate Reality Project, South Central Coast chapter

Ted Morton  
Executive Director  
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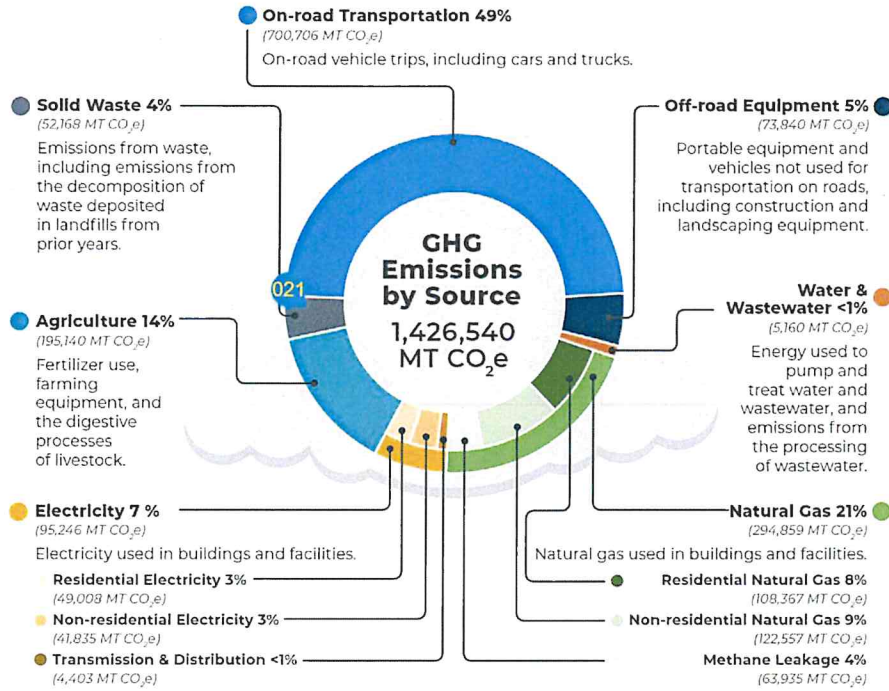
Colin Jones  
Santa Barbara League of Women Voters  
Environmental Action Committee

Michael Lyons  
President  
Get Oil Out!

Vivienne Chankai and Izzi Sisteck  
Advocacy Chairs  
UCSB Environmental Affairs Board

Leah Stokes  
Climate Policy Professor  
UC Santa Barbara

FIGURE 3. 2018 Unincorporated County GHG Emissions by Source



For the purposes of this CAP, stationary sources are excluded because the County lacks primary regulatory control over many of these facilities.<sup>4</sup> Percentages are rounded and do not add to 100%.

4. This CAP has been designed to be CEQA-qualified. The County does not have primary regulatory control over existing oil and gas facilities within its jurisdiction and thus, would not have substantial evidence to demonstrate an ability to reduce emissions and meet State and local targets if stationary sources, such as oil and gas operations, were to be included within its inventory.

Excluded emissions:

Stationary Source GHG Emissions - Summary				
	2008	2016	2018	2022
Electricity Importer	0	0	0	0
Electricity Generation	32,341	13,579	15,313	0
Oil and Gas Production	387,525	116,799	122,987	123,905
Other Combustion Source	56,496	113,552	36,170	110,290
Refinery	16,266	23,277	15,218	0
<b>TOTAL</b>	<b>492,628</b>	<b>267,207</b>	<b>189,688</b>	<b>236,217</b>