**de la Guerra, Sheila** Public Comment - Group 1 #4

LATE DIST

**From:** sharyne merritt <organicavocadogrower@gmail.com>
**Sent:** Monday, April 4, 2022 4:29 PM
**To:** sbcob
**Subject:** public comment 4/6/22 Climate Action Plan
**Attachments:** CO2e from ag Rindon error.docx

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I sent the attached letter individually to each of the supervisors but, if possible, would like it included in the record as pubic comment

thank you
sharyne merritt

## RINCON DATA ON CATTLE (DAIRY) VS AG COMMISSION DATA

Prepared by Sharyne Merritt member AAC

**Both total to 44,805 head but Rincon has attributed 7,664 to Dairy and AgCom estimates 800 max or possibly none**

## RINCON DATA

Rincon 2022 SB Inv and Forecast Memorandum_Public Draft.pdf (page 30 of 49)

Highlight Rotate Markup Sear

**Table 21 GHG Emissions from Agriculture**

| Data | 2018 |
|---|---|
| Activity Data (tons of nitrogen fertilizer)[1] | 13,469 |
| Activity Data (head of Beef Cattle)[2] | 28,479 |
| Activity Data (head of Dairy Cattle)[2] | 8,662 |
| Activity Data (head of Other Cattle)[2] | 7,664 |
| **Emissions from $N_2O$ Applied as Fertilizer** | |
| Emissions factor (MT $CO_2e$/tons N fertilizer)[1] | 2.404 |

[24] *Note: Energy usage and emissions associated with agriculture activities are included in the Energy Sector.*





| | |
|---|---|
| Emissions (MT $CO_2e$) | 32,380 |
| **Emissions from Enteric Fermentation** | |
| Emissions factor (MT $CO_2e$/head of beef cattle)[3,4] | 2.673 |
| Emissions factor (MT $CO_2e$/head of dairy cattle)[3,4] | 4.049 |
| Emissions factor (MT $CO_2e$/head of other cattle)[3,4] | 1.676 |
| Emissions (MT $CO_2e$) | 124,033 |
| **Emissions from Manure Management** | |
| Emissions factor (MT $CO_2e$/head of beef cattle)[2,5] | 0.089 |
| Emissions factor (MT $CO_2e$/head of dairy cattle)[2,5] | 3.667 |
| Emissions factor (MT $CO_2e$/head of other cattle)[2,5] | 0.577 |
| Emissions (MT $CO_2e$) | 38,727 |
| **Total Agricultural Emissions (MT $CO_2e$)** | **195,140** |

[1] Data is scaled to unincorporated agricultural acreage (94.5%). 2018 County-wide data obtained from CDFA Fertilizer report: https://www.cdfa.ca.gov/is/ffldrs/pdfs/2018_Tonnage.pdf

[2] Livestock data obtained from CASR reports, checked for validation with 2018-2019 reports, Santa Barbara County. https://www.cdfa.ca.gov/statistics/PDFs/2018-2019AgReportnass.pdf

[3] Emissions factors are from CARB GHG Inventory Query Tool (14th edition). https://www.arb.ca.gov/app/ghg/2000_2019/ghg_sector.php

[4] Enteric fermentation emission factors have been converted from $CH_4$ to $CO_2e$.

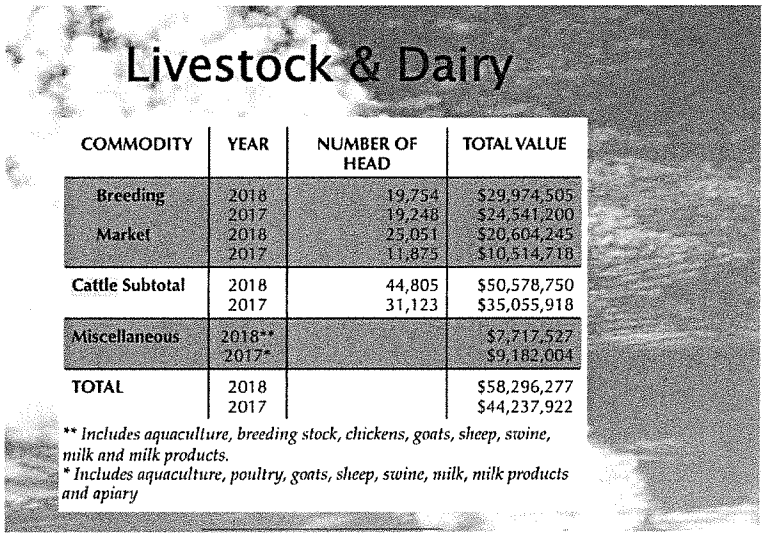
[4] Manure management emission factors have been converted from $CH_4$ and $N_2O$ to $CO_2e$. Emission factor is average of anaerobic digester, anaerobic lagoon, daily spread, deep pit, and liquid/slurry

**AgCOMMISSIONER DATA**

https://countyofsb.org/uploadedFiles/agcomm/Content/Other/crops/2018.pdf

] Carp farm | Getting Started | personal | Berkeley | County | sabbie | water | Grand | duck duck go

14 (12 of 20) | Automatic Zoom



## Livestock & Dairy

| COMMODITY | YEAR | NUMBER OF HEAD | TOTAL VALUE |
|---|---|---|---|
| Breeding | 2018 | 19,754 | $29,974,505 |
| | 2017 | 19,248 | $24,541,200 |
| Market | 2018 | 25,051 | $20,604,245 |
| | 2017 | 11,875 | $10,514,718 |
| Cattle Subtotal | 2018 | 44,805 | $50,578,750 |
| | 2017 | 31,123 | $35,055,918 |
| Miscellaneous | 2018** | | $7,717,527 |
| | 2017* | | $9,182,004 |
| TOTAL | 2018 | | $58,296,277 |
| | 2017 | | $44,237,922 |

** *Includes aquaculture, breeding stock, chickens, goats, sheep, swine, milk and milk products.*
* *Includes aquaculture, poultry, goats, sheep, swine, milk, milk products and apiary*

Phone conversation with Matthew at AgCom office:
Cannot verify that there are any dairy cattle in SBCounty now
Estimated 800 in 2016 or 2017

Because emissions factors on manure management of dairy cows is high, using correct numbers result in 22% lower CO2e from ag than Rincon Report indicates

RINCON

enteric fermentation

| | activity / head | emissions factor | MT $CO_2e$ |
|---|---|---|---|
| cattle | 28479 | 2.673 | 76,124 |
| dairy | 8662 | 4.049 | 35,072 |
| other | 7664 | 1.676 | 12,845 |
| | 44805 | | 124,042 |

manure management

| | activity / head | emissions factor | MT $CO_2e$ |
|---|---|---|---|
| cattle | 28479 | 0.089 | 2,535 |
| dairy | 8662 | 3.667 | 31,764 |
| other | 7664 | 0.577 | 4,422 |
| | 44805 | | 38,720 |

| | MT nitrogen | emissions factor | MT $CO_2e$ |
|---|---|---|---|
| fertilizer | 13469 | 2.404 | 32,379 |
| | | | 195,141 |

| **TOTAL SBC** | MT $CO_2e$ | ag % |
|---|---|---|
| | 1427755 | 14% |

Ag Commissioner

enteric fermentation

| | activity / head | emissions factor | MT $CO_2e$ |
|---|---|---|---|
| | 44005 | 2.673 | 117,625 |
| | 800 | 4.409 | 3,527 |
| | | 1.676 | |
| | | | 121,153 |

manure management

| | activity / head | emissions factor | MT $CO_2e$ |
|---|---|---|---|
| | 44005 | 0.089 | 3,916 |
| | 800 | 3.667 | 2,934 |
| | | 0.577 | |
| | | | 6,850 |

| | MT nitrogen | emissions factor | MT $CO_2e$ |
|---|---|---|---|
| | 13469 | 2.404 | 32,379 |
| | | | 160,382 |

| MT $CO_2e$ | ag % | dif |
|---|---|---|
| 1,392,996 | 12% | -22% |

## de la Guerra, Sheila

| | |
|---|---|
| **From:** | Ben Schwartz <ben@clean-coalition.org> |
| **Sent:** | Monday, April 4, 2022 5:11 PM |
| **To:** | Lavagnino, Steve; Williams, Das; Hart, Gregg; Hartmann, Joan; Nelson, Bob; sbcob |
| **Cc:** | Hanke, Aaron; Gregory Young; Craig Lewis; Bantilan, Cory; Cuevas, Yesenia; Fischer, Gina; Dietenhofer, Meighan; Litten, Jefferson; Henson, Chris; Bertrand, Ethan; Kruzel, Ashley; Elliott, Darcel |
| **Subject:** | Clean Coalition Comments on County ECAP |
| **Attachments:** | Clean Coalition Comments on Santa Barbara County ECAP (08_bs, 4 April 2022).pdf; Proposed amended definition of utility-scale solar in SB County w Direct Relief example (07_cl, 11 Sep 2019).pdf |

**Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.**

Dear Santa Barbara County Supervisors,

Attached to this email is a comment letter from the Clean Coalition in support of the Santa Barbara County ECAP and three proposed ordinances as well as a document explaining necessary changes to the definition of Utility-Scale Solar. The Clean Coalition is a firm believer that having a clear roadmap is essential for developing renewable energy and resilience, which are both desperately needed throughout the Goleta Load Pocket.

The Clean Coalition advocates that the County Board of Supervisors directs staff to begin implementation of long term solutions with Clean Coalition amendments, while taking short term actions to streamline development of projects on built environments. This will most effectively allow the County to unleash the potential of renewable energy and achieve climate goals.

Best regards,

Ben Schwartz

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Ben Schwartz
Policy Manager
Clean Coalition
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www.clean-coalition.org

Clean Coalition

Santa Barbara County Board of Supervisors

123 East Anapamu Street

Santa Barbara, CA 93101

April 5, 2022

**Re: Consider recommendations regarding the 2015 Energy and Climate Action Plan**

To the Santa Barbara Board of County Supervisors,

The Clean Coalition appreciates the steps that the County has and continues to take with regards to adapting as the climate changes and smoothly transitioning to clean sources of energy. We support all three actions recommended for approval by the Board of Supervisors. However, as it currently stands, the Energy and Climate Action Plan (ECAP) does not provide nearly enough specific actions given how much the energy landscape has changed over the last three years, since the County passed the Strategic Energy Plan (SEP) in 2019. We believe that the Board should, in addition to the three proposed ordinances, provide targeted actions for staff to take that will help accelerate the County's decarbonization process and gauge progress on the direction/timelines outlined in the SEP. Our comments will address four critical areas currently missing from the ECAP (and proposed ordinances) that we hope to highlight for the Board:

1. methods to achieve grid resilience via Community Microgrids,
2. why changing the definition of "utility-scale solar" will lead to more effective resource deployment,
3. the reasons that pushing for 3CE to approve effective energy programs is essential to the transition,
4. and how streamlining permitting processes can increase investments in renewable energy throughout Santa Barbara County.

The next eight years will be a scramble to achieve rigorous goals, requiring swifter action than the business-as-usual approach to policy making used in prior decades; the best thing that the

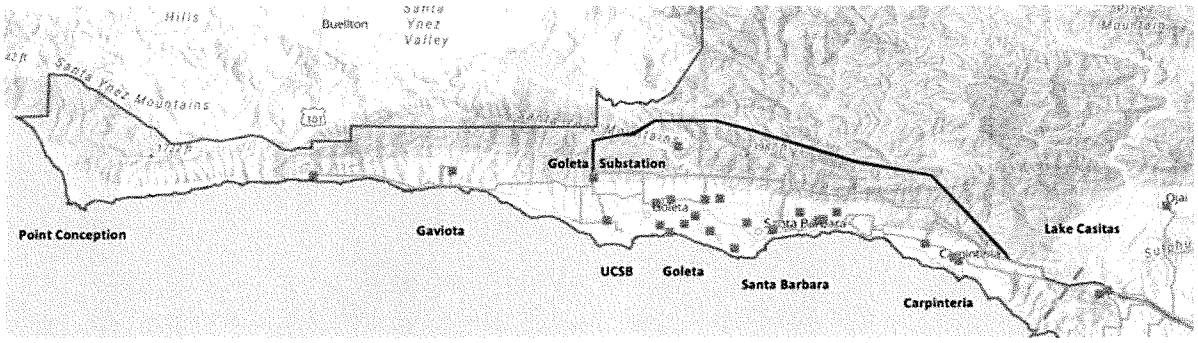
County can do right now is to outline and begin to work on immediate actions that will yield benefits in the short-term, as part of the broader framework of electrification. While climate change poses an existential threat in the long-term, many of the consequences — wildfires, increasing temperatures, etc., — will need to be addressed as they occur. Therefore, the more proactive solutions the County can implement, the better positioned Santa Barbara will be years down the line. The ECAP states it best with the phrase, "we must be strategic and realistic about what we can achieve. Some measures take more time and effort than others, while some are more impactful than others. With this CAP, we have to focus on the County's strengths and actions that can achieve depth, speed and scale when it comes to emissions reductions."[1] The following Clean Coalition recommendations can be categorized as, "providing direction to staff regarding implementation of early climate actions," while urging to the County to hasten the transition to renewables-driven resilience.

**Promote energy resilience through the Goleta Load Pocket (GLP) Community Microgrid**

Each of the three proposed ordinances will increase the demand for clean energy, resulting on more wear and tear on the grid. Decarbonization inherently necessitates infrastructure that is reliant enough to support the delivery of that energy and resilient in cases of emergencies. The Supervisors should note that the grid is becoming increasingly complex, with more and more resources importing and exporting every day. While the electric grid continues to expand, the base capabilities necessary for a resilient grid have not been improving at the same rate, particularly when considering that Santa Barbara is experiencing climate change at a higher rate than almost any other community in the nation. Therefore, it is of critical importance that the County consider grid resiliency to be a key piece for achieving decarbonization. We appreciate discussions of resilience in both the SEP and the ECAP and wish to underscore the importance of having specific actions to support the underlying assessment about the need for greater energy

[1] ECAP at 14

resilience.[2] The Clean Coalition's solution is to harden the local grid, through the deployment of a Community Microgrid that spans the Goleta Load Pocket (GLP)[3], to ensure that there is enough local energy to sustain critical loads for 100% of the time - and the rest of the loads for substantial percentages of the time as well. To achieve indefinite renewables-driven backup power that provides 100% protection to the GLP against a complete transmission outage 200 megawatts (MW) of solar and 400 megawatt-hours (MWh) of energy storage needs to be sited within the GLP.




*Map of the Goleta Load Pocket (GLP)*

This can be achieved through the construction of solar on built environments (rooftops, parking lots, and parking structures). Although 200 MW of solar sounds daunting, it represents just five times the amount of solar that is currently installed in the region, and the Clean Coalition has assessed that 200 MW of additional solar will require 7% of the commercial-scale solar siting potential on GLP rooftops, parking lots, and parking structures - assuming all 200 MW of solar is

[2] "These events have increased the need for developing more resilient energy systems to ensure vulnerable populations and critical facilities are not left without power." ECAP at 17

[3] The Goleta Load Pocket (GLP) is the grid area served by the Goleta Substation. The GLP is a 70-mile stretch of California coastline spanning from Point Conception to Lake Casitas. There are only two transmission lines serving the GLP and both run on the exact same transmission towers through tens of miles of mountainous terrain that is rated at the highest fire risk level - resulting in the GLP being extremely vulnerable to transmission outages, including during Public Safety Power Shutoffs (PSPS). SCE has been clear that if there are failures in the transmission lines serving the GLP and/or the Goleta Substation itself the GLP will completely lose the source of vast majority of the energy that serves it for up to months at a time.

sited on built environments, which is being very conservative, since some solar will definitely be deployed on residential rooftops, and some will potentially be deployed on open ground as well.

- Develop procurement goals that center around the GLP Community Microgrid Initiative goals, including the development of 200MW of solar and 400 MWh of storage within the GLP, as a fundamental component to secure energy resilience for the region.
    - The 2019 SEP identified that during the Thomas Fire, the Ellwood Peaker Plant was unable to provide energy because of technical issues. If proper grid isolating switches were in place, this would have not been the case. Of course, the Ellwood Peaker needs to be replaced with solar and storage, but the need for proper grid isolating switches remains the same.
- Pressure Southern California Edison to install grid isolating switches throughout the GLP, potentially as part of Wildfire Mitigation efforts or through an application under the Microgrid Incentive Program.
- Prioritize resilience for all energy planning. The SEP and ECAP do reference the importance of resilience, especially for critical community facilities. The County should advocate that SCE focus on resilience in the GLP and 3CE roll out effective programs for local renewables and other distributed energy resources.
    - *Importantly, resilience must be properly valued and compensated.*

**Changing the definition of "Utility-Scale Solar"**

During the process of approving a Strategic Energy Plan, the Clean Coalition appreciated the Board's interest in the opportunity to quickly fix the current definition of "Utility-Scale Solar", a relatively easy effort that would immediately result in new possibilities for front-of-meter ("FOM") solar installations. All it would take is exempting built environments — rooftops, parking lots and parking structures — from the existing definition of Utility-Scale Solar. We are disappointed to learn that the initial two-year process to reform the ordinance has not resulted in this relatively easy fix and reinforce the importance that such a simple definitional change can make on the viability of solar throughout Santa Barbara County. This is especially true for

commercial & industrial sectors, which the ECAP notes will require significant changes in order to achieve 2030 climate goals.

- The Clean Coalition is strongly in favor of amending the definition of Utility-Scale Solar to not include solar developments on any type of built environment (rooftops, parking lots, and parking structures), regardless of project size.
    - The new definition would need to be changed in two places, the Land Use Development Code and the other in the Comprehensive Plan (Land Use Element).
    - A full fact sheet is attached as a separate document.

**Leveraging Central Coast Community Energy (3CE) as an essential partner**

Central Coast Community Energy, or 3CE, is responsible for sourcing the County's electricity and developing programs that represent the best interests of the members that it serves. These energy programs should complement the County's goals and make it easier for residents to do their part in the switch to clean energy. The County needs to use its seats on the board to ensure that viable and efficient energy programs are available to help residents so everyone can do their part. Moreover, our local representatives that sit on the 3CE boards should have examples of successful programs developed by other agencies, so that 3CE does not need to reinvent the wheel each time energy programs are discussed and can instead use tried and true methods. With efficient programs in place for energy efficiency and the deployment of renewable energy, reducing our reliance on natural gas is much less of a daunting task than it otherwise might be.

- The County should promote programs that allow paired solar+storage to optimize resilience. 3CE recently rolled out a program for standalone FOM energy storage, suggesting that it will be beneficial for resilience purposes. This is incorrect for two reasons:
    - The program was not designed with real world project economics in mind. FOM energy storage is not eligible for state rebates and energy storage not paired with renewables for all of its charging is not eligible for tax benefits. Overall, requiring no connection to a renewable energy resource makes deploying a FOM energy

storage project infeasible, which everyone will once again discover after 3CE wastes precious years on yet another program for distributed energy resources (DER) that is designed to fail.

- To be resilient, energy storage needs some sort of generation, otherwise there will be no way to recharge the battery when the grid is down. Banning storage paired with generation inherently defeats the purpose of using energy storage for resilience purposes.

- The County should advocate that 3CE replicate Peninsula Clean Energy's (PCE) Local Government Solar and Storage Program[4], which helps local governments to site and deploy solar or Solar Microgrids on government-owned facilities.
  - PCE provides technical expertise to local governments — starting with the design work — and then secures qualified companies to finalize designs, and operate resources.
  - PCE partners with a tax equity investor to ensure that the tax benefits are monetized. This is critical since the tax benefits are worth half the installed costs of solar and Solar Microgrids projects.
  - PCE ultimately owns the solar and Solar Microgrid projects, selling the delivered energy to the properties served. Importantly, even though these projects are behind-the-meter (BTM), PCE does not lose any load because it is the one that owns the projects and is selling its energy to facilities accordingly.
  - By aggregating all sites into one portfolio for the RFP, PCE entices a single company to bid on all the projects collectively, reducing the overhead that comes with the normal process (conducting a feasibility study, an RFP, vendor selection, and management/verification) while preserving the local government's voice in the process.
  - PCE's first tranche of projects amounts to over 2 MW of solar and over 1.1 MWh of energy storage, as shown in this table.

[4] https://www.peninsulacleanenergy.com/wp-content/uploads/2022/02/03-14-2022-EC-Agenda-Packet.pdf at Page 15/Item 5

| Site | Owner / Jurisdiction | Battery (kW) | Battery (kWh) | Total PV Base Case (kW DC) | Estimated Annual AC Solar Production (MWh/yr) |
|---|---|---|---|---|---|
| Atherton Town Hall | City of Atherton | | | 113.5 | 177.6 |
| Brisbane Mission Blue Center | City of Brisbane | | | 132.8 | 207.8 |
| Belmont Police Station | City of Belmont | | | 88.5 | 140.4 |
| Colma Community Center | City of Colma | | | 88.7 | 140.3 |
| Brisbane Mission Blue Center | City of Brisbane | 25 | 155 | 11.1 | 17.4 |
| Colma Community Center | City of Colma | 40 | 415 | 61.5 | 95.2 |
| Fair Oaks Community Center | City of Redwood City | 75 | 300 | 88.5 | 141.3 |
| Hillsborough Public Works Yard | City of Hillsborough | | | 41.8 | 64.4 |
| Los Banos Community Center | City of Los Banos | | | 151.7 | 249.1 |
| Los Banos Wastewater Plant | City of Los Banos | | | 287.0 | 510.3 |
| Millbrae Chetcuti Building & Complex | City of Millbrae | | | 411.5 | 639.5 |
| Millbrae Rec Center | City of Millbrae | | | 155.0 | 224.4 |
| Pacifica Community Center | City of Pacifica | 60 | 240 | 76.7 | 119.8 |
| San Carlos Youth Center | City of San Carlos | | | 29.5 | 42.7 |
| San Mateo County HSA Building (2500 Middl | County of San Mateo | | | 125.5 | 201.7 |
| San Mateo Police Building | City of San Mateo | | | 169.8 | 266.5 |
| **Sub-total committed and pending projects** | | **200** | **1110** | **2033.1** | **3,239** |

*PCE's first tranche of Local Government Solar and Storage Program projects*

- Marin Clean Energy (MCE), another CCA, has exemplary energy storage programs (see footnote below for the link) to, "connect customers with existing or new solar to available incentives, program funding, performance payments, and financing for battery storage to keep power on during an outage, and provide electric bill savings."[5] The County should demand a similar basic partnership from 3CE.
- The County should promote microgrid programs. 3CE has references to potential microgrid programs but does not have a timeline for development or a rollout. As the County considers what facilities can be considered "critical facilities", the natural next step is to outfit these facilities with behind-the-meter microgrids.
    - Ultimately, the County should push for a long-term goal of financial/technical assistance to support the deployment of Community Microgrids.
- The County should advocate for a Feed-In Tariff program — the most effective procurement mechanism that currently exists — patterned on the Los Angeles Department of Water and Power FIT+ Program.[6]
- Meet with representatives of 3CE and stress the importance of local resources (e.g., any project deployed within the distribution grid). 3CE programs currently do not support the

[5] MCE Energy Storage Program: https://www.mcecleanenergy.org/facility-energystorage/

[6] https://www.ladwp.com/ladwp/faces/ladwp/commercial/c-gogreen/c-gg-commsolarprograms/c-gg-csp-fit;jsessionid=gcWyvLnVZJGrvyY62sGdG9K15GpGGGpn4JQ64nQZhjkTLGKvRhWX!-815348159?_afrLoop=309649551140769&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D309649551140769%26_afrWindowMode%3D0%26_adf.ctrl-state%3D4unb41ymi_4

deployment behind-the-meter (BTM) resources in a meaningful/creative way compared to other Community Choice Aggregators.

**Permitting for Solar, Storage, and Solar+Storage Projects**

The Clean Coalition also wants to highlight issues surrounding the permitting of standalone solar or storage projects, as well as solar+storage projects. Outrageously long waiting periods and the expensive costs associated with solar+storage permitting are two of the main obstacles preventing the renewable potential throughout Santa Barbara County from being unleashed.

- Prioritize the SEP solutions in Phase Two, calling for an independent commission made up of neighboring Authorities Having Jurisdiction (AHJs) and members of the local solar+storage industry to determine proper guidelines.
- Pre-approve any Electric Vehicle Charging Infrastructure (EVCI) projects in addition to reducing permitting costs associated with them.
- Pre-approve any project on a built environment, especially if it meets certain criteria determined by this new commission.
    - Until this step can be achieved, expedite permitting procedures (currently the SEP mentions the County takes around ten days, but according to state guidelines, should only take between one and three days).
- Properly utilize online platforms to improve the permitting process for all clean energy projects, not just storage projects as was suggested in the SEP.
- Implement a virtual inspection system and extend this to projects of any size on built environments.

The Clean Coalition would like to thank the County for the hard work it has put into reviewing the ECAP, and we firmly believe that approving it, along with the three proposed ordinances, is the first of many important steps. The County is in dire need of more renewable energy and renewables-driven resilience. The state is predicting that the current resource makeup will need to double, if not triple in some cases, to sustain electrification; to achieve the goals outlined in the

ECAP in a timely fashion, Santa Barbara County must be at the forefront of leading the charge to deploy more renewable resources, rather than struggling to keep up with the rest of the state. The few key amendments delineated above will greatly enhance the favorable outcomes for Santa Barbara County as they are implemented over the next few years. We appreciate the opportunity to comment on this document and look forward to collaborating with the County in the future.

Sincerely,

Craig Lewis

Clean Coalition Founder and Executive Director

Clean Coalition
Making Clean Local Energy Accessible Now

**Utility-Scale Solar definition needs to be amended in Santa Barbara County**

Currently, Santa Barbara County defines utility-scale solar in a manner that preempts front-of-meter (FOM) solar on built environments and drastically limits the opportunity to deploy commercial-scale solar throughout the County. To fix the issue, the following details are provided in this document:

1) Existing definition of Utility-Scale Solar.
2) Amended definition of Utility-Scale Solar.
3) Both instances where the definition appears in Santa Barbara County code.
4) Direct Relief case-study illuminating the critical importance of amending the definition.

**Existing definition of Utility-Scale Solar Photovoltaic Facilities:**

Utility-Scale Solar Photovoltaic Facilities. Facilities that are connected to the electrical grid on the utility side of the electric meter and are built for the primary purpose of generating and selling wholesale power.

**Proposed amended definition of Utility-Scale Solar Photovoltaic Facilities:** [Note that the only changes to the existing definition are the underlined additions.]

Utility-Scale Solar Photovoltaic Facilities. Facilities that are <u>not on built environments and</u> connected to the electrical grid on the utility side of the electric meter and are built for the primary purpose of generating and selling wholesale power. <u>Solar facilities of any size that are constructed on built environments, including rooftops, parking lots, and parking structures; and within property setbacks thereof; are not utility-Scale Solar facilities.</u>

**The amended definition needs to be applied in the following two places**:

1. Santa Barbara County Comprehensive Plan, Land Use Element
    - **Utility-Scale Solar Photovoltaic Facilities**: Facilities that are connected to the electrical grid on the utility side of the electric meter and are built for the primary purpose of generating and selling wholesale power.
        - *Santa Barbara County Comprehensive Plan, Land Use Element. County of Santa Barbara. Amended December 2016. Pg 150. Found here: http://longrange.sbcountyplanning.org/programs/genplanreformat/PDF docs/LandUseElement.pdf.*

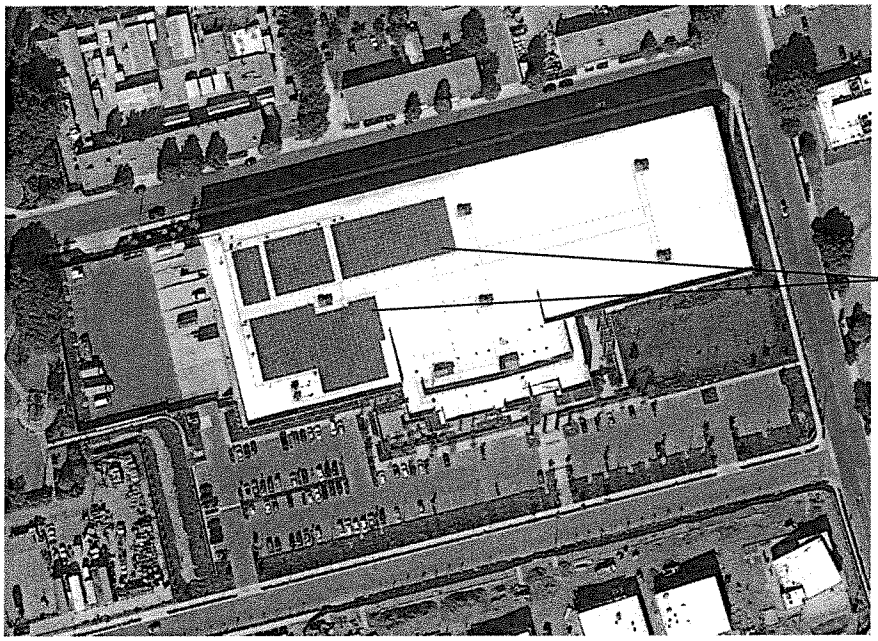
2. Santa Barbara County Land Use and Development Code, Definitions
    - **Utility-Scale Solar Photovoltaic Facilities**: Facilities that are connected to the electrical grid on the utility side of the electric meter and are built for the primary purpose of generating and selling wholesale power. The electricity generated by the facility is not primarily used for on-site activities (such as farming or domestic water heating).
        - *Santa Barbara County Land Use & Development Code. (September 2018). County of Santa Barbara Planning and Development. Chapter 35.11, Pg 64. Found here: <u>http://sbcountyplanning.org/pdf/forms/LUDC/LUDC.pdf</u>*

Clean Coalition
Making Clean Local Energy Accessible Now

## Direct Relief example

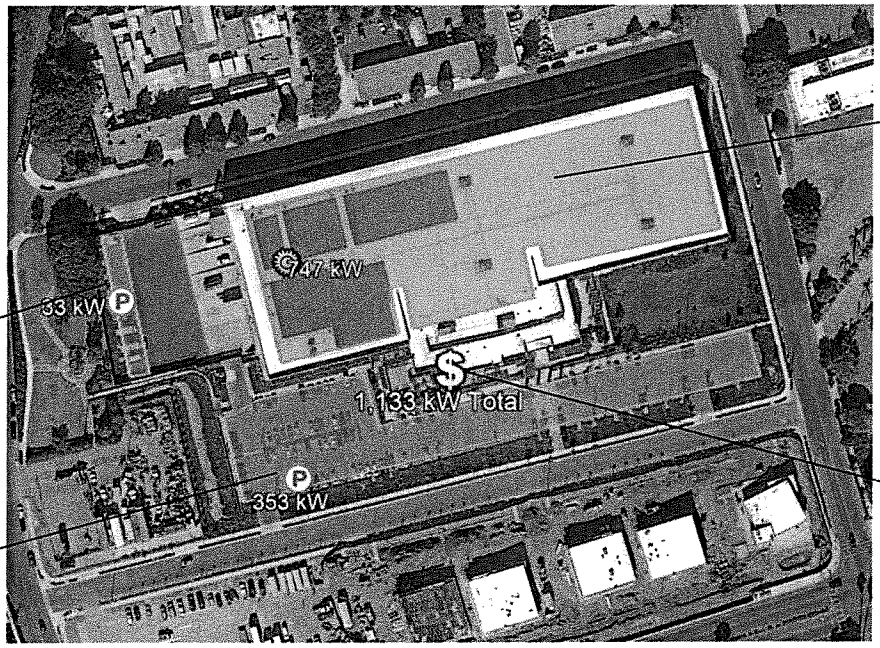
Direct Relief serves as a prime example of why Santa Barbara County needs to remove its current preemption of front-of-meter (FOM) solar on built environments: Direct Relief's headquarter location in Santa Barbara County has far more rooftop and parking lot solar siting opportunity than its existing 320 kW solar project utilizes. Net Energy Metering (NEM) and more general behind-the-meter (BTM) constraints limit Direct Relief to 320 kW of solar even though its built-environments can support almost four time that amount of solar. The currently wasted ~75% of Direct Relief's solar siting opportunity, which Direct Relief is interested in harnessing in support of the Goleta Load Pocket (GLP) Community Microgrid, requires the ability to connect the additional FOM solar on built environments.

**Existing Situation**



**320 kW PV**
*Limited by Net Energy Metering constraints.

**Potential Situation**




**747 kW PV**
Flat roof potential
*Includes existing 320 kW

**33 kW PV**
Parking potential

**1,133 kW PV of total potential**
* Combination of flat roof and parking potential

**353 kW PV**
Parking potential