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July 5, 2017

Ben Ellenberger  
Technology & Environmental Assessment Division Manager  
Santa Barbara County Air Pollution Control District  
260 N. San Antonio Road #A  
Santa Barbara, CA 93110

### Re: Local Greenhouse Gas Mitigation Program

Mr. Ellenberger,

The Community Environmental Council (CEC) appreciates the opportunity to comment on the Santa Barbara County Air Pollution Control District's (SBCAPCD) development of a local greenhouse gas (GHG) mitigation program. CEC strongly supports development of local GHG offsets. We encourage APCD staff to consider requiring 50% or more of any offsets to be purchased locally.

Local mitigation will increase the ability to verify that GHG mitigation measures achieve additional GHG reductions. At the same time, we can bring the benefits from GHG mitigation back to our region with a local offset program, which would support new pathways for enhancing the productivity of our agricultural lands, sustaining the local economy, and improving our collective health and well-being.

To support the development of a SBCAPCD local mitigation program, we would like to submit the following comments on specific mitigation measures presented at the agency's Board of Directors meeting on June 15:

#### *Carbon Farming*

- In addition to compost applications approved under CAPCOA, we encourage staff to keep other carbon farming practices in mind that can sequester significant amounts of carbon and are particularly suitable for our agricultural region (silvopasture being one example). As the COMET-Planner becomes more developed, we recommend expanding local mitigation measures to include different carbon farming practices<sup>1</sup>.
- It would be helpful if staff could provide additional clarification about the methods and assumptions used to set the number of acres where carbon farming projects are implemented. In the June 15 staff presentation to the SBCAPCD Board of Directors, it was assumed that 683 acres would receive compost applications but many more acres in the County are suitable for carbon farming.

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<sup>1</sup> COMET-Planner: carbon and greenhouse gas evaluation for NRCS conservation planning practices.  
<http://comet-planner.com/>



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- Methodologies for quantifying carbon farming benefits are currently in development and should be incorporated into a local GHG mitigation program, so SBCAPCD staff can evaluate the co-benefits of carbon farming for our agricultural lands. Ideally, these measured co-benefits will include but not be limited to: enhanced soil health, increased agricultural revenue, higher agricultural production, natural resource protection, and greater land and agricultural resiliency.

#### ***Building Retrofits – Energy Efficiency & Solar***

- For the proposed energy efficiency and solar measures, we encourage staff to consider a longer mitigation life of 20 to 25 years. It is common for solar warranties to be 25 years and solar power purchase agreements (PPAs) to be 20 years. Similarly, many energy efficiency measures have a life exceeding 15 years. Depending on the suite of energy efficiency retrofits available for local GHG mitigation, a longer mitigation life may be justified.
- It is hard to prove additionality with these types of measures since some individuals and organizations would move forward with retrofits without incentives for solar and energy efficiency improvements. The cost of solar and energy efficiency retrofits present financial barriers to lower-income households, as documented in a recent report from the California Energy Commission's report<sup>2</sup>. Prioritizing incentives for lower-income households or areas, such as those designated by CARB for the implementation of Assembly Bill 1550, would increase the likelihood of solar and energy efficiency offsets achieving additional GHG emission reductions<sup>3</sup>.
- If utilized for a residential program, the APCD could consider tying the rebate to solar group purchasing programs (such as CEC's Solarize program) that offer a limited time discount on new home solar systems. Group purchase programs include community-based marketing and outreach that could create extra buzz about a solar incentive for GHG mitigation, possibly leading some people to install solar who wouldn't do so otherwise.
- Additional co-benefits could be realized if the program prioritized nonprofits or schools instead of individuals. Larger arrays for these types of facilities may see lower costs and thus a better return on GHG reductions per dollar of mitigation investment.

<sup>2</sup> [SB 350 Low-Income Barriers Study, Part A](#) – Commission Final Report. Adopted December 14, 2016.

<sup>3</sup> [Disadvantaged and Low-income Communities Investments](#) - California Air Resources Board. Last reviewed April 20, 2017.



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***Battery Electric Vehicle Charging Infrastructure & Zero Emission Vehicle (ZEV) Rebates***

- We encourage staff to consider offering grants of \$5,000 per port or a minimum of \$10,000 for a dual port station since this could help lower the cost of offsets and increase the return on investment for each dollar of mitigation funding.
- To capture the latest market trends, we encourage SBCAPCD staff to evaluate the cost of installations completed for the SBCAPCD charging station grant program and to look at installation costs in other regions. This information will help inform the amount of mitigation funding needed for different EV charging station installations.
- To help ensure that ZEV rebates for local mitigation support additional reductions in GHG emissions, we recommend income eligibility requirements for these rebates that will limit participation to lower-income individuals who are priced out of the ZEV market. We encourage staff to conduct additional research for setting these limits and to contact other agencies or organizations offering ZEV rebates for lower-income buyers, including the Center for Sustainable Energy's Clean Vehicle Rebate Program.

We are also wondering if staff can share a full accounting of the Case Study assumptions and calculations presented to the SBCAPCD Board of Directors on June 15. Making this information publicly available will facilitate additional input on estimated GHG emission reductions and project lifetimes for the mitigation measures that are evaluated.

CEC strongly supports SBCAPCD's efforts to create a local GHG mitigation program that can bring more benefits from carbon offsets to our region. We look forward to providing additional input as staff continue exploring local mitigation options. Thank you for considering our comments.

Sincerely,

Michael Chiacos  
Energy & Climate Program Director