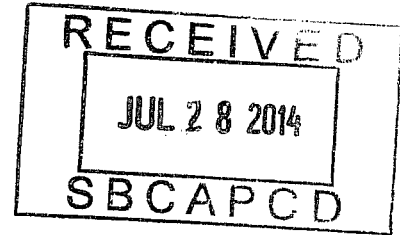


110 S. PINE STREET #101 (ON HERITAGE WALK) • SANTA MARIA, CALIFORNIA 93458-5082 • 805-925-0951 • TDD 925-4354

July 22, 2014

Molly Pearson
Santa Barbara County APCD
260 N. San Antonio Road, Ste. A
Santa Barbara, CA 93110



Dear Ms. Pearson:

The City of Santa Maria supports the APCD's work to establish GHG thresholds for the region, because it would provide consistency for the region, improve the defensibility of our CEQA determinations, and reduce uncertainty for the development community.

Of the options provided, the City supports:

Consistency with AB 32 Scoping Plan and Goals. The City of Santa Maria supports this option because it is consistent with State mandates and spreads the burden of reduced emissions across most projects. Any of the proposed approaches is acceptable (or a combination thereof). This option also may be most adaptable to a new State threshold for 2050, if the State elects to enact one.

Comments on Other Options

No Threshold. The City of Santa Maria does not support this option. We appreciate APCD's work toward a threshold that can be uniformly applied throughout the region.

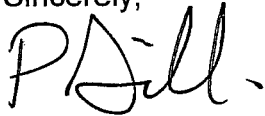
Zero. The City of Santa Maria does not support this option. This is an extreme approach that is entirely inconsistent with State legislation. The very concept of a 2020 target in AB 32 means that the State legislature considers there to be an accepted level of GHG emissions, which is contrary to a zero threshold. A zero threshold could lead to a conclusion that no project that might add GHG could qualify for an exemption, which would have dramatic detrimental impacts to all local governments in the regions, and their economies. To justify a zero threshold that goes beyond the State mandate would likely result in litigation that would further delay a uniform threshold for the region, which is not in the best interest of the region.

Ms. Pearson
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Bright line. The City of Santa Maria does not object to this option, but does not consider this to be the best option.

Thank you for your consideration of our opinions and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Gilli". The signature is written in a cursive, slightly slanted style.

Peter Gilli, Planning Division Manager
COMMUNITY DEVELOPMENT DEPARTMENT