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December 12, 2014

APCD Staff, CAC and Board of Directors  
Santa Barbara County Air Pollution Control District (APCD)  
260 North San Antonio Road, Suite A  
Santa Barbara, CA 93110

Re: Threshold of significance for Greenhouse Gas (GHG) emissions.

APCD Decision Makers,

On behalf of our over two thousand members and the citizens and residents of Santa Barbara, we are writing to thank you for acting to address greenhouse gas emissions under the California Environmental Quality Act (CEQA) and to urge you to adopt a zero emissions threshold for significance.

The latest report from the IPCC, the UN Intergovernmental Panel on Climate Change, states unequivocally that human influence on the climate system is already impacting all continents, reducing grain yields worldwide and costing human lives. It says, “We have little time before the window of opportunity to stay within 2°C of warming closes.” It further states that we need to reduce emissions by 40 to 70 percent between 2010 and 2050 and to zero by 2100 to avoid “severe, pervasive and irreversible impacts for people and ecosystems.”<sup>1</sup>

Local impacts from GHG emissions are also well documented, including temperature and ecosystem disruption, rising sea levels, ocean acidification, impacts to water supplies, wildfires, etc.<sup>2</sup>

Given this reality, and the scientific consensus that we must reduce emissions, not increase them, it is unacceptable to set an emissions threshold of 10,000 tons. This is equivalent to adding 2,000 additional cars to county roads, and that is clearly significant. If you must set a threshold, it should capture all major new industrial sources of emissions. That means setting a threshold as close to zero as practical. (We might understand a threshold of 25 tons, a level the APCD generally considers significant for criteria pollutants.)

We find the other options presented (percentage reduction from BAU) convoluted, unprecedented, unworkable and unacceptable. Firstly, this approach does not set a threshold. It doesn't make sense that a pollutant is significant only to the degree it differs from best practices. It is significant if it adds net new pollution regardless of the mechanism. This approach is more like setting a convoluted remedy than a threshold. Secondly, we think this approach would have little practical impact and the oil industry would try to undermine it. They are already spending millions of dollars on lobbying and front groups in an attempt to undermine AB 32.<sup>3</sup>

The APCD's obligation is to "add GHG threshold to significance criteria for cumulative impacts" under CEQA. The APCD's mission is "to protect the people and the environment of Santa Barbara County from the effects of pollution."

Given this task, you should set an actual threshold, and it should take into account the scientific consensus that we must decrease (not increase) GHG emissions to protect people and the environment. Only a zero threshold or something very close to zero, meets those criteria.

It should be noted that 100% of the citizen comments at the public meetings on this issue called for a zero threshold and so this must be an option brought to the CAC and APCD Board.

The APCD's mission is not to protect industry or industry profits, but to protect the people and the environment of Santa Barbara County. Given the oil industry's stated goal to increase the use of steam injection for oil extraction in Santa Barbara County—among the most carbon-intensive forms of oil extraction in the world—it is essential that APCD resist industry lobbying.

We look to you to set a scientifically-based threshold of significance and to protect people and the environment of the county. That means a zero emissions threshold.

Respectfully submitted,



Robert Bernstein  
Chair, Sierra Club, Santa Barbara Group

<sup>1</sup>[http://www.ipcc.ch/pdf/ar5/prpc\\_syr/11022014\\_syr\\_copenhagen.pdf](http://www.ipcc.ch/pdf/ar5/prpc_syr/11022014_syr_copenhagen.pdf)

<sup>2</sup> <http://www.sbnature.org/content/715/Frank%20Davis%20Statement.pdf>

<sup>3</sup><http://www.businessweek.com/articles/2014-11-25/revealed-the-oil-lobbys-playbook-against-californias-climate-law#p1> and [http://switchboard.nrdc.org/blogs/mborgeson/oil\\_industry\\_doubles\\_spending.html](http://switchboard.nrdc.org/blogs/mborgeson/oil_industry_doubles_spending.html)