



December 29, 2014

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.

Dear APCD Staff and Directors,

We are writing to urge you to adopt a zero threshold for GHG emissions.

1. 100% of the public comments from citizens at the public meetings held on this issue called for a zero threshold. This must be the option brought forward.
2. This is already a status quo default position being used by state agencies to evaluate projects. Anything other than a zero threshold is a step backwards.

e.g., EIR for the Goleta oil project (PRC 421 Recommissioning Project) uses a zero threshold in lieu of APCD setting one.

4.4 Air Quality and Greenhouse Gases

4-140 "Until such time the Santa Barbara County APCD establishes GHG thresholds, the threshold of "zero net increase" for GHG emissions recommended by CSLC staff would require mitigation and would be less than significant"

(http://www.slc.ca.gov/division_pages/DEPM/Reports/Venoco_PRC_421/PDF/4.0_Impacts_pt1.pdf)

3. The 10,000 tons option is far too high. This is the equivalent of adding 2,000 cars to county roads. It also doesn't take into account cumulative impacts from lots of new projects and may increase and encourage industry to game the system by coming in just under this level. For instance, the large 56 well "North Garey" steam injection oil project approved in March came in at an estimated 9,850 tons of GHGs. A number of projects of this size would be a very significant increase in emissions. 25 tons is more customary number to use.

e.g., EIR for the Goleta oil project (PRC 421 Recommissioning Project) references 25 tons.

4.4 Air Quality and Greenhouse Gases

4-135 "As stated above, neither the City of Goleta nor the APCD have established thresholds of significance for construction emissions, but the APCD generally considers emissions of any criteria pollutant that exceed 25 tons per year to be significant."

(http://www.slc.ca.gov/division_pages/DEPM/Reports/Venoco_PRC_421/PDF/4.0_Impacts_pt1.pdf)

4. The “percentages off” options do not comply with the goal to create a threshold for CEQA significance. Regardless of the percentage reduction, if the result of a project is a large increase in pollution, that new source of pollution is significant. By the logic of a percentage reduction, a project could lead to a 10-fold increase emissions in the county and be judged insignificant provided they demonstrate that it could be even worse. There is no precedent for this approach for good reason. It is an unacceptable “solution” that is worse than the status quo.
5. Our county’s tight oil reserves can only be accessed using extremely carbon-intensive forms of oil extraction. According to the California Air Resources Board, some of the oil fields in our county are among the most carbon-intensive in the world. Furthermore, the oil industry is spending record sums in California and in Santa Barbara County to influence elections and ensure they have as little regulatory oversight as possible. Given this, it is essential that the APCD set a clear goal to not increase emissions in the county and stand by it.

At a time when the scientists are telling us that climate change is affecting us now in the form of drought, increased wildfires, rising sea levels and other catastrophic impacts, and that these impacts will be irreversible if we do not begin reducing greenhouse gas emissions, it is incumbent on APCD to take seriously our obligation to reduce greenhouse gas emissions, starting with a net zero increase for discretionary projects. The stakes could not be any greater.

Sincerely,

John Foran, Ph.D.
Bill Palmisano
Charlene Little
Catherine Gautier-Downes, Ph.D.
Rebecca Claassen
Hunter Grosse
Corrie Ellis
Arlo Bender-Simon
Grace Feldmann
Vivian Stanton
Rebecca August
Katie Davis
John Broberg
Max Golding

350 Santa Barbara
GHG Emissions Committee