



City of Santa Barbara

Community Development Department

www.SantaBarbaraCA.gov

January 13, 2015

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Mary Byrd, Community Programs Supervisor
Molly Pearson, Planning & Grants Supervisor
Santa Barbara County Air Pollution Control District
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110

Delivery via email to ceqa@sbcapcd.org
and via U.S. Mail.

Subject: District CEQA Guidelines Update for Stationary Source Greenhouse Gas Emissions

Dear Ms. Byrd and Ms. Pearson:

The City of Santa Barbara Community Development Department, Planning Division has reviewed District materials and options pertaining to the proposal to add a CEQA greenhouse gas (GHG) cumulative impact significance threshold to the District CEQA Guidelines. The proposed threshold would be applicable to new or modified stationary source projects subject to CEQA environmental review when the APCD is lead agency for CEQA review and permitting.

The Planning Division recommends the December 2014 Option 4 Hybrid/Step-Wise proposal. This option would capture most emissions, correlate with State AB 32 goals and State Cap-and-Trade regulations, recognize local CEQA options for programmatic GHG mitigation approaches, and avoid the administrative burden and cost for small sources. The use of the 10,000 MTCO₂e/year screening threshold as part of this option also provides for some consistency with the approach adopted by other jurisdictions and air districts in the State, including the Bay Area AQMD, San Luis Obispo APCD, and South Coast APCD, and the approach used by the County of Santa Barbara for recent energy projects. Changes to climate information and State legislation and regulations will occur over time, and may be expected to necessitate periodic updates to local criteria for evaluating climate change effects.

Thank you for the public workshops and opportunity to comment. Please contact Barbara Shelton of this office with any questions on this matter (bshelton@santabarbaraca.gov).

Sincerely,

Bettie Weiss, City Planner

c: Mayor Helene Schneider
Paul Casey, City Administrator
George Buell, Director, Community Development Department
Barbara Shelton, Project Planner/Environmental Analyst