



January 16, 2015

Santa Barbara Air Pollution Control District
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110

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SB CAN

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Re: Threshold of significance for Greenhouse Gases

Dear Decision Makers,

Santa Barbara County Action Network (SB CAN) works to promote social and environmental justice, to preserve our environmental and agricultural resources, and to create sustainable communities. All of these objectives are seriously threatened by climate change.

Accordingly, we applaud the District's intent to address greenhouse gas emissions (GHG) under the California Environmental Quality Act. On behalf of our members we urge you to adopt a zero-emissions threshold for significance.

Local and global impacts from GHG emissions are well documented, including temperature and ecosystem disruption, rising sea levels, ocean acidification, impacts to water supplies, and wildfires. The scientific consensus is that we must reduce emissions, not increase them.

A year and more ago, SB CAN championed a lower threshold for GHG emissions than was proposed by Santa Barbara County staff for the Santa Maria Energy project. We advocated a zero-emission threshold, but settled for a 10,000-ton threshold, judging that was far better than the 68,000 tons proposed to be allowed.

With mounting scientific evidence and given precedents set

by others, such as the State Lands Commission's zero-emission threshold, we no longer find it acceptable to set an emissions threshold of 10,000 tons. Each project allowed under such a threshold would be equivalent to adding 2,000 cars to county roads, which to us is definitely significant.

If the District deems it necessary to set a threshold above zero to avoid undue burdens on very small projects, it should be designed to capture all major new industrial sources of emissions. That means setting a threshold as close to zero as practical. The District generally uses a 25-ton threshold for criteria pollutants and that might be reasonable for GHG emission as well. Still, it would be better to have a zero-emission threshold and to design rules that do not place undue burdens. This threshold should not force projects into environmental review solely on the basis of projected greenhouse gas emissions because there are ample opportunities to fully mitigate greenhouse gas emissions, and the District should help project proponents find these opportunities.

In a related aside, the District should aggressively pursue every means of providing GHG offsets locally, so we get the economic benefits and related reductions in criteria pollutants.

The residents, businesses and local governments in Santa Barbara County have made strides to reduce our greenhouse gas emissions, but without a zero-emission threshold, just a few large projects could reverse this downward trend. The District's mission is to "protect the people and the environment of Santa Barbara County from the effects of air pollution" and allowing increased greenhouse gas emissions is inconsistent with this.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ken Hough', written in a cursive style.

Ken Hough
Executive Director