

## Summary of General Comments and Input Received

### GHG Mitigation Strategies in Santa Barbara County – Workshops September 20 and 21, 2017

The District held workshops September 20 and 21, 2017 to discuss and gather input on greenhouse gas (GHG) mitigation strategies in Santa Barbara County. Following is a brief summary of the general comments and input that the District received before, during and after the workshops. Comments related to the specific strategies are included in the individual summaries for each strategy.

Some organizations provided written comments; copies of those letters are available on the District website at [www.ourair.org/ghgmitigation-sbc](http://www.ourair.org/ghgmitigation-sbc).

#### General Comments

General comments have been organized into separate categories below.

##### *Comments on Local GHG Mitigation*

- GHG Mitigation should be done where it benefits the most people and is most cost-effective.
- Local mitigation isn't cost-effective when compared to the cost of offsets on national exchanges.
- The District's website should clearly note the difference in cost-effectiveness between local mitigation projects and national/global exchanges.
- There are already established mitigation programs that have a reputation. For a local program, who would implement projects and verify/validate reductions, and are they credible?
- Don't see the need for additional co-benefits from local mitigation; the projects themselves are creating co-benefits by creating local jobs. If projects can't be done because local mitigation makes them infeasible, the County loses out on local jobs.
- Suggest presenting the pros and cons of global vs. local mitigation cost-effectiveness on our website; it doesn't make financial sense to do local GHG mitigation without co-benefits.
- Strong support for developing local GHG offsets. Support requiring 50% or more of offsets to be local.
- Local mitigation increases the ability to verify that GHG reduction goals are achieved.
- Local mitigation projects will enhance productivity of our agricultural lands, help local economy, and improve community health and well-being.
- Can a multiplier be used for local mitigation projects, to show them as more cost-effective? How do we justify that?
- How much GHG reduction potential is there in the County? Is it even possible to fully mitigate a project locally?
- Suggest a combination of local and national/global mitigation.

##### *Comments on the Role of the District and Other Organizations*

- The District could present GHG Mitigation Measures at the UCSB Sustainability Summit.
- Suggest that the District act as a GHG "credit bank". Instead of funding specific measures, companies should pay the District an agreed-upon sum of money that goes into a general mitigation fund that is used to fund projects at the District's discretion. The District could elicit feedback from the public about which projects to fund.
- Suggest doing mitigation by giving research grants to UCSB to study GHG reduction and carbon sequestration. Is UCSB researching or designing battery storage technology?

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#### *Comments on the Types of Measures, and Additional Ideas for Mitigation Projects*

- The spreadsheet of GHG mitigation strategies includes only electric options. The District should be fuel and technology neutral, and emphasize cost-effectiveness of solutions.
- A diverse energy portfolio, that includes multiple fuels and technologies, is needed to meet California and Santa Barbara County's energy needs and environmental policies in a cost-effective and feasible manner.
- Suggest doing mitigation by installing offshore wind turbines on Platform Holly.
- Suggest researching the use of algae farms to sequester carbon – the byproducts are biodiesel and fertilizer.
- Suggest considering roundabouts for traffic flow improvement as GHG mitigation.
- Can commuter rail improvements, or high speed rail, be a mitigation measure? Perhaps it's too speculative.
- Can a mitigation measure consist of banning the use of diesel trucks, perhaps as a condition of approval?
- Suggest exploring how to provide shore power for cruise ships that visit the Santa Barbara Harbor, by providing a large battery or a hydrogen fuel cell on a barge.
- Suggest including options for projects that produce renewable natural gas (RNG) and give credit to those who commit to purchase and use RNG.

#### *Comments on the Mechanics of GHG Mitigation*

- Preference for mitigation to occur up-front, instead of staggered over a long period of time. This does more in the near-term to affect climate change.
- Like the simplicity of rebate measures – familiar, simple to implement, clear air quality co-benefits (toxics/criteria), direct benefit to consumers, countywide. Benefits occur for many years after.
- A single project could use utilize several strategies – for example, solar generation, battery storage, charging infrastructure, and vehicle purchase incentives. Would a multi-measure approach maximize GHG reduction potential, and lower the cost-per-ton?
- Some benefits to a multi-measure approach:
  - a. Increase property values (benefits property owners/managers)
  - b. Energy cost savings (benefits businesses)
  - c. Transportation cost savings (benefits employees)
- In requiring local mitigation of a source that is already subject to Cap and Trade, is an agency double-dipping on the mitigation requirements?
- Can GHG reductions be credited when NOx emission reduction credits (ERCs) are done for the electrification of agricultural pump engines? If that can be done, the emissions from indirect GHGs from electricity use should be factored into the equation.
- CARB still uses a low global warming potential (GWP) multiplier for methane (21 or 25). The Intergovernmental Panel on Climate Change (IPCC) says that it should be much higher (in the 80's, at least initially). When the GWP value for methane is increased, this changes the conversation around methane reduction measures.
- Suggest creating a mitigation bank from developer fees.

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#### Additional District Discussion

##### *On Local GHG Mitigation*

There are many co-benefits to providing GHG mitigation locally. These co-benefits are included in the individual measure summaries and are also highlighted in the spreadsheet that was created for this effort. The District acknowledges that local mitigation can cost a great deal more than purchasing offsets from a national or international GHG offset registry. However, the community and public health benefits provide strong reasoning to implement GHG mitigation locally.

For additional information on the amount and nature of our local GHG emission inventory, Chapter 3 of Santa Barbara County's Energy and Climate Action Plan includes an emission inventory for the unincorporated portion of Santa Barbara County.<sup>1</sup>

##### *On the Role of the District and Other Organizations*

The District is providing this information as a resource to CEQA lead agencies, project applicants, and government agencies preparing or updating climate action plans. Ultimately, any decision about whether to implement a particular mitigation measure as part of the CEQA process would rest with CEQA lead agencies. The spreadsheet that is provided shows some ideas for calculation methodologies, and generally follows established state methodologies with some local information included as appropriate. When project-specific mitigation is proposed, these methodologies can be used as a starting point, and can be revised with more accurate, current, or project-specific assumptions.

The District is frequently involved in the review and assessment of air quality and climate change impacts related to land use development projects. Air quality mitigation strategies may eventually be implemented by the District or by another business, government, or nonprofit agency. Any mitigation strategies implemented by the District will involve some form of agreement and implementation plan, and must be approved by the District's governing board before being implemented.

##### *On the Types of Measures, and Additional Ideas for Mitigation Projects*

In offering these ideas and resources for lead agencies, project proponents, and project developers, the District is not promoting one strategy over another. The District acknowledges that there are many other GHG reduction strategies, involving many different fuel types, technologies, and industries, that are not included. Many of the suggestions that were made at the workshop could be researched further to determine whether there is a way to quantify the GHG reductions associated with the strategy, and explore how potential projects could be implemented.

##### *On the Mechanics of GHG Mitigation*

The District acknowledges that using a "multi-measure" approach can be helpful in making a mitigation package overall more successful, especially when applied to new building projects. For example, zero emission vehicle (ZEV) rebates could be paired with installing fueling/charging infrastructure in a specific housing development or community. Another example is pairing energy efficiency with onsite renewable energy and battery storage. For projects not involving new buildings, the measures may work

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<sup>1</sup> [longrange.sbcountyplanning.org/programs/climateactionstrategy/climateaction.php](http://longrange.sbcountyplanning.org/programs/climateactionstrategy/climateaction.php)

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better as discrete measures, as opposed to a combined mitigation package. A “combination solar + battery” measure was developed and added to the calculation spreadsheet, and this combination measure shows that, when paired with solar generation, the overall cost-effectiveness for the combination measure is better than a battery storage measure by itself. This assumes that the battery is grid-integrated, and can help balance out the use of renewables in the grid overall.

Some workshop participants had questions on how the amount of GHG mitigation is determined through the CEQA process, and how mitigation requirements work for facilities subject to CARB’s Cap and Trade Program. In 2015, the District prepared a white paper to answer some of these questions. The paper is titled *Greenhouse Gas Mitigation and CEQA: A Review of Mitigation Strategies for Projects Subject to the California Environmental Quality Act*, and is included on the District’s website at <https://www.ourair.org/ghgmitigation-sbc>.