

**Public Comment Received between  
March 25, 2015 (after 10:00am) to March 26, 2015**

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**From:** Linda Ulvaeus  
**Sent:** Wednesday, March 25, 2015 11:08 AM  
**To:** CEQA contact  
**Subject:** GHG Emissions....set at net zero increase

**I request that the APCB make protecting our climate a top priority by setting the the threshold for GHG emissions from stationary sources at zero.**

We need a "net zero increase" in emissions, We need to be reducing our emissions, not increasing them. New stationery sources of greenhouse gas emissions will undo all the work we've done over decades with conservation such as changing light bulbs, buying electric vehicles, and putting up solar panels.

Thank you,  
Linda Ulvaeus  
Santa Barbara CA 93109

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**From:** Pam Bury  
**Sent:** Wednesday, March 25, 2015 12:51 PM  
**To:** CEQA contact  
**Subject:** set the lowest threshold possible for GHG emissions from stationary sources

I am very concerned that the SBAPCD make protecting our climate a top priority!

I was born in Santa Barbara in 1950 and have lived here all my life: I know that the weather has changed, gardening has changed, it is too hot, it is too dry--and human activity is causing climate change that is affecting our beautiful state and county.

Please set the lowest threshold possible for GHG emissions from stationary sources, at a net zero increase in emissions or less. Our children and all future generations deserve no less from our government, say NO to short-term business interests and \$\$\$, and protect the land, air and water NOW!

Sincerely,  
Pamela Bury

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**From:** Laura Francis  
**Sent:** Wednesday, March 25, 2015 1:33 PM  
**To:** CEQA contact  
**Subject:** Support for net zero emissions

Along with my family and my community , I support a net zero increase in emissions for Santa Barbara.

Laura

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**From:** Arlo Bender-Simon  
**Sent:** Wednesday, March 25, 2015 1:42 PM  
**To:** CEQA contact  
**Subject:** Green House Gas Emissions Threshold

Hello,

My name is Arlo and I am currently in my fifth year residing in Santa Barbara county. As I consider my future on the central coast of California, the threat of climate change weighs heavily in my deliberation. While changes in our planet's climate moving forward are now unavoidable, we can still act to reduce the impact these will have on humanity. I want to see Santa Barbara county, along with all of California, leading in the effort to stop ongoing human-caused climate change.

There is no entity more responsible for the climate change we face than the fossil fuel industry. Through the destruction of lands to extract dirty fuels, the exploitation of indigenous peoples, the power and wealth granted to oppressive governments in possession of black gold, and the massive emission of greenhouse gases, oil and gas companies keep alive a negative strain of human industry that is harming the health of planet Earth.

Greenhouse Gases are pollutants. Not only are they changing the chemistry of our planet's climate, they have negative impacts on life forms that happen to be nearby. Skin, lungs, eyes, nose; anywhere that is in contact with the air is vulnerable to oil and gas pollution.

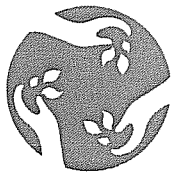
There is no longer any excuse to allow for these emissions to take place. Renewable energy can be deployed today. We can massively reduce our consumption of oil and gas if we make the transition to clean energy now. New emissions of green house gases are unacceptable.

In order to reduce our collective ghg emissions to zero, we must start with the fossil fuel industry.

As a resident of Santa Barbara County, I urge you to adopt a "zero net increase" emissions standard for all new oil and gas projects.

Thank you,

--  
Arlo Bender-Simon  
Isla Vista Food Coop Back End Clerk  
UCSB Class of 2014  
B.A. in History & Environmental Studies



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Ms. Molly Pearson  
Santa Barbara County Air Pollution Control District  
260 North San Antonio Road, Suite A  
Santa Barbara, CA 93110

March 25, 2015

**Re: Greenhouse Gas Emissions Thresholds of Significance under the California Environmental Quality Act**

Dear Ms. Pearson:

The Community Environmental Council (CEC) appreciates the opportunity to comment on the APCD's threshold options for GHG emissions under the California Environmental Quality Act (CEQA). Setting an appropriate threshold of significance is a powerful measure by which APCD can reduce GHG emissions from the region.

Given the dire threat posed by climate change and the fact that global atmospheric carbon dioxide is already at unsustainable levels, all GHG emissions are significant and thus should be mitigated. CEC therefore advocates that the APCD adopt a zero emission threshold of significance. Climate change impacts are cumulative and caused by both large and small emitters; a zero emission threshold is the only option that appropriately addresses the threats posed by climate change.

However, if APCD does not adopt a zero emission threshold, CEC advocates for a bright-line threshold of 1,000 MT CO<sub>2</sub>e. A bright-line threshold allows for simplicity of implementation and creates uniform regulation across projects. According to APCD's Staff Report, a 1,000 Metric ton threshold will capture 98.6% of the emissions from stationary sources within the County.

Both the APCD and the County staff reports on GHG thresholds reference a potential "administrative burden" posed by setting a threshold which would apply to too many sources. To avoid this "administrative burden", CEC proposes that projects with emissions ranging from 1,000 MT CO<sub>2</sub>e to 10,000 MT CO<sub>2</sub>e be subject to a programmatic EIR with approved standard mitigation procedures.

According to the APCD staff report, under a 1,000 Metric ton threshold 347 of the 418 stationary sources in the county would fall below the threshold not be subject to further environmental review. Of the remaining stationary sources, the vast majority could be addressed with a programmatic EIR and be subject to standard mitigations and possibly receive mitigated negative declarations. This would leave only the largest emitters, according to the APCD report just twelve, which would undergo full environmental review. The programmatic EIR thus relieves the administrative burden upon County and/or APCD staff while providing project developers with a suite of mitigation options that could be incorporated into proposed projects.

CEC encourages APCD to adopt a 1,000 Metric ton bright-line threshold coupled with a programmatic EIR option for "smaller" emitters. This option offers APCD a 98.6% capture rate, avoids unnecessary administrative burden, and provides project developers with approved mitigation options.

Thank you for your consideration of these comments. Please do not hesitate to contact me if you have any questions.

Sincerely,

Jefferson Litten  
Energy Program Manager

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**From:** Dorothy Littlejohn  
**Sent:** Thursday, March 26, 2015 4:03 PM  
**To:** CEQA contact  
**Subject:** Air Pollution

Please control the air we breathe. **APCD should make protecting our climate a top priority by setting the lowest threshold possible for GHG emissions from stationary sources.**  
thank you

Dorothy Littlejohn

Santa Barbara, CA 93103