

ATTACHMENT 2

Santa Barbara Climate Action Plan PUBLIC COMMENT LETTERS RECEIVED

June 27; email	Navigant , Jennifer Barnes
July 3; letter	Native American Heritage Commission, Dave Singleton, Program Analyst
July 17; emailed letter	Santa Barbara Association of Realtors, Jim Caldwell, President
July 23; email	David Gibbs
July 25; email	Frank Diani
August 2; emailed letter	Community Environmental Council, Dave Davis, Executive Director, and Michael Chiacos, Transportation Manager
August 6; emailed letter	Heal the Ocean, Hillary Hauser, Executive Director and James O. Hawkins, Associate Researcher
August 6; emailed letter	Environmental Defense Center, Nathan G. Alley, Staff Attorney
August 6; letter	Santa Barbara County Air Pollution Control District, Carly Wilburton, Air Quality Specialist, Technology and Environmental Assessment Division

Shelton, Barbara

From: Jennifer Barnes [jennifer.barnes@navigant.com]
Sent: Wednesday, June 27, 2012 9:37 AM
To: Shelton, Barbara; 'Gary Griggs'; Nicole Russell; 'jbailard@sedcontech.com'; 'Joe McFadden'; 'Misti Brucer'
Subject: RE:

Hi Barbara,

Thanks for sending this. We took a quick read through the final plan. Again, we think it's very comprehensive and didn't see any major red flags.

We do have one suggestion for comprehensive community engagement and education. When communications and outreach are mentioned, it is usually specific to a single program but, ideally, the City would create a cohesive, overarching brand platform and communications plan designed to engage stakeholders and motivate residents and businesses to do their part. Specifically, the communications plan would:

- Provide the community and stakeholders with a clear understanding of the overall sustainability plan;
- Use a single name and brand that will engage community members and resonate with various stakeholders;
- Be based on knowledge of what motivates residents and businesses to take conservation action, and what doesn't. Ideally, the City could update any research used for this every few years to keep up with changes in attitudes and awareness;
- Encompass the measure or program specific education campaigns mentioned throughout the plan to clearly demonstrate that the different programs and initiatives are aligned with a big picture, city-wide effort;
- Communicate the plan's goals and GHG emissions reduction progress on a consistent and ongoing basis; and
- Integrate the City's operational accomplishments to leverage "lead by example" messages and public relations opportunities.

Please let me know if you have any questions and thanks again for sending.

Jennifer

From: Shelton, Barbara [mailto:BShelton@SantaBarbaraCA.gov]
Sent: Thursday, June 21, 2012 12:41 PM
To: 'Gary Griggs'; Nicole Russell; 'jbailard@sedcontech.com'; 'Joe McFadden'; Jennifer Barnes; 'Misti Brucer'
Subject:

Hello,

This is to let you know that the City of Santa Barbara Draft Climate Action Plan has been released for public review through August 6th (see attached notice).

The Draft Plan documents are available on the City web site at the following link:
[http://www.santabarbaraca.gov/Resident/Major Planning Efforts/Climate Action Plan](http://www.santabarbaraca.gov/Resident/Major_Planning_Efforts/Climate_Action_Plan).

Thanks for your analytic input and peer review help on this effort.

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-8251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
da_nahc@pacbell.net



July 3, 2012

Ms. Barbara Shelton, Project Planner

City of Santa Barbara

530 Garden Street; P.O. Box 1990
Santa Barbara, CA 93102

Re: **SCH#2012061072; CEQA Notice of Completion; Addendum to Environmental Impact Report (EIR - 2009011031) for the "City of Santa Barbara Climate Action Plan Project;"** located in the City of Santa Barbara; Santa Barbara County, California.

Dear Ms. Shelton:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC did conduct a Sacred Lands File (SLF) search within the 'area of potential effect (APE)' and Native American cultural resources were identified in the project area specified., City of Santa Barbara

The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American

contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

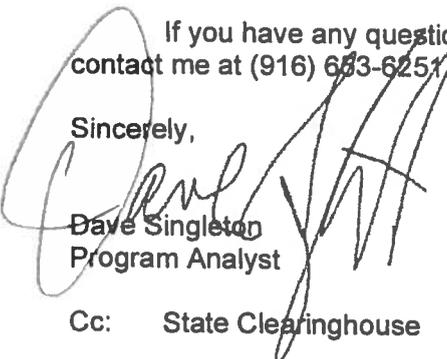
Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contacts
Santa Barbara County
July 3, 2012

Ernestine DeSoto
1311 Salinas Place # 5
Santa Barbara CA 93101
805-636-3963
Chumash

Patrick Tumamait
992 El Camino Corto
Ojai , CA 93023
(805) 640-0481
(805) 216-1253 Cell
Chumash

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes@msn.com
805 492-7255
(805) 558-1154 - cell
Chumash
Tataviam
Ferrnandefio

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil
1030 Ritchie Road
Grover Beach CA 93433
(805) 481-2461
(805) 474-4729 - Fax
Chumash

Santa Ynez Band of Mission Indians
Vincent Armenta, Chairperson
P.O. Box 517
Santa Ynez , CA 93460
varmenta@santaynezchumash.
(805) 688-7997
(805) 686-9578 Fax
Chumash

John Ruiz
1826 Stanwood Drive
Santa Barbara CA 93103
(805) 965-8983
Chumash

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stennsleie, Chairwoman
365 North Poli Ave
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jtumamait@sbcglobal.net
(805) 646-6214
Chumash

Gilbert M. Unzueta Jr.
571 Citation Way
Thousand Oaks, CA 91320
uhuffle@aol.com
(805) 375-7229
Chumash

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012061072; CEQA Notice of Completion; Addendum to the EIR 2009011031 for the Climate Action Plan; located City-wide; City of Santa Barbara; Santa Barbara County, California.

Native American Contacts
Santa Barbara County
July 3, 2012

Stephen William Miller 189 Cartagena Camarillo , CA 93010 (805) 484-2439	Chumash	Charles S. Parra P.O. Box 6612 Oxnard , CA 93031 (805) 340-3134 (Cell) (805) 488-0481 (Home)	Chumash
Santa Ynez Tribal Elders Council Adelina Alva-Padilla, Chair Woman P.O. Box 365 Santa Ynez , CA 93460 elders@santaynezchumash.org (805) 688-8446 (805) 693-1768 FAX	Chumash	Santa Ynez Band of Mission Indians Tribal Administrator P.O. Box 517 Santa Ynez , CA 93460 info@santaynezchumash. (805) 688-7997 (805) 686-9578 Fax	Chumash
Randy Guzman - Folkes 6471 Cornell Circle Moorpark , CA 93021 ndnRandy@yahoo.com (805) 905-1675 - cell	Chumash Fernandeño Tataviam Shoshone Paiute Yaqui	Carol A. Pulido 165 Mountainview Street Oak View , CA 93022 805-649-2743 (Home)	Chumash
Coastal Band of the Chumash Nation Toni Cordero, Chairwoman P.O. Box 4464 Santa Barbara CA 93140 cordero44@charter.net 805-964-3447	Chumash	Melissa M. Parra-Hernandez 119 North Balsam Street Oxnard , CA 93030 envyy36@yahoo.com 805-983-7964 (805) 248-8463 cell	Chumash

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Native American Contacts
Santa Barbara County
July 3, 2012

Frank Arredondo
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ksen_sku_mu@yahoo.com
805-617-6884
ksen_sku_mu@yahoo.com

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
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Camarillo , CA 93012
805-987-5314

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Conslt
P.O. Box 365 Chumash
Santa Ynez , CA 93460
freddyromero1959@yahoo.
805-688-7997, Ext 37

Aylisha Diane Marie Garcia Napoleone
33054 Decker School Road Chumash
Malibu , CA 90265

Barbareno/Ventureno Band of Mission Indians
Kathleen Pappo
2762 Vista Mesa Drive Chumash
Rancho Pales Verdes CA 90275
310-831-5295

This list is current only as of the date of this document.

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This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012061072; CEQA Notice of Completion; Addendum to the EIR 2009011031 for the Climate Action Plan; located City-wide; City of Santa Barbara; Santa Barbara County, California.



July 17, 2012

Commissioner Bruce Bartlett
Commissioner John P. Campanella
Commissioner Michael Jordan
Commissioner Stella Larson
Commissioner Sheila Lodge
Commissioner Deborah L. Schwartz
Commissioner Addison Thompson
630 Garden St
Santa Barbara, CA 93101

Dear Commissioners,

The Santa Barbara Association of REALTORS® would like to take this opportunity to comment on the City of Santa Barbara Draft Climate Action Plan: June 2012 Public Review Draft. While reviewing the Climate Action Plan Draft we were pleased to continuously notice that many of the communitywide measures were based upon encouragement and voluntary actions as opposed to mandates. However, there are two specific communitywide measures that need to be addressed:

- 1) Page 2-22 – Measure 4 – Section (e)
Upgrades at time of sale. Adopt ordinance provisions to establish requirements for energy efficiency upgrades at the time of property sale to increase the efficiency of existing building stock.
- 2) Page 2-47 – Measure 66 – Section (e)
Toilet retrofits prior to building sales. To coincide with California state law Senate Bill 407, establish a program in 2017 (residential) and 2019 (commercial) to work with the real estate industry to require a certificate of compliance be submitted to the City that efficient fixtures are in place or installed at the time of sale prior to close of escrow. Consider allowing this certification to be made as part of the conventional private building inspection report process.

These two mandated time of sale communitywide measures unfairly burden home sale transactions. To place the burden of the whole community on only homebuyers and sellers is inequitable. These types of mandates are highly inefficient in getting all members of the community to comply with new standards. While some homes are sold every few years, many others remain with the same owner for many years, or even decades. Therefore, if new standards are really important enough to be mandated by law, then the implementation of those standards should be applied to all homes in the community. These mandates also add complications to sales transactions. Another step only delays the escrow process and adds more stress to the homebuyer and seller. The cost of retrofitting or of an inspection can cause the home sales price to increase drastically, leaving the potential homebuyer with an added expense, and possibly, the inability to purchase a home. Government mandates should be implemented, overseen, administered and applied evenly to the entire community. They should not target home sellers and home buyers.



When SB 407 was enacted in the State legislature, the point-of-sale aspect of the bill was removed by the author. The bill "requires, on and after January 1, 2017, a seller of certain residential real property to make a specified disclosure in this regard". In response to this, the California Association of REALTORS® added to the Transfer Disclosure Statement "water-conserving plumbing fixtures". With this disclosure in place mandating this point-of-sale is moot.

We would like to reiterate that these two point-of-sale mandates need to be eliminated from the City of Santa Barbara Draft Climate Action Plan: June 2012 Public Review Draft and all future documents.

Sincerely,



Jim Caldwell
President



Shelton, Barbara

From: David Gibbs [davidgnsb@yahoo.com]
Sent: Monday, July 23, 2012 12:02 PM
To: Shelton, Barbara
Cc: cbolton@newspress.com
Subject: Comments on draft climate plan for city of Santa Barbara

Dear Planning Division Officers,

This plan does not contain any probabilities or even estimates of success or attach any costs for the various proposals.

How can a plan be voted on where there are no reasonable calculations of outcome and cost?

Is our local government oblivious to the importance of how we invest government time and \$ resources? Should they be done only after careful assessment and weighing where we can best apply our limited resources, especially in the current dramatic economic climate?

This appears to be a "Wish List", based on beliefs rather than careful study. Is this the next painted blue line?

Please do not present this draft, it is an embarrassment.

Sincerely,
David Gibbs
Santa Barbara, CA

Shelton, Barbara

To: Shelton, Barbara
Subject: RE: Mr. Campanella (et al at PC)

From: Frank [mailto:fpdiani@aol.com]
Sent: Wednesday, July 25, 2012 12:19 PM
To: Community Development PC Secretary
Cc: voices@newspress.com
Subject: Mr. Campanella (et al at PC)

SB City Planning Commission
Mr. John Campanella

et al, July 25, 2012

Last Saturday I read, with some interest, the SBNP article titled "City plan proposal would limit carbon emissions" by Ms. Bolton. A list was included of some measures the City might take to achieve low carbon emissions. In particular, 'renewable-energy' measures were suggested... etc.

While it is admirable for all of us to consider ways of reducing carbon emissions, the pressure to adopt a "Little Chicken-Sky is falling" mentality should be *courageously* avoided. We must also be *thoughtfully realistic* in evaluating the enormity of the task *and* especially the long time frame which a task of such *world-encompassing* magnitude will take. That is why "narrowing the streets in Santa Barbara" as a candidate solution, in particular, struck me as being an almost humorous solution.

There is a big world out there, a population of some 6 Billion people (give or take) living in both "developed" and "undeveloped" countries. And the total population I understand comprises less than 2% of the earth's surface. [The oceans, we are told, comprise some 70% of the surface.]

Therefore, it is obvious that the Santa Barbara area population of some 300,000 people (more or less), comprises only about 0.005% of the earth's population. With all due respect to this beautiful area, it is, therefore, only a tiny carbon contributor on the world's stage. China, India, (*populations of some 1 Billion each*) and other developing countries, are belching out tons of carbon emissions daily - in their *legitimate* quest to grow and develop. Which make Santa Barbara's contributions appear rather miniscule.

Regardless, I understand we have to *start* somewhere, but narrowing streets for instance, is not what many of us would put on the critical 'to-do' list. Dangers to bicyclists, pedestrians, some autos, etc. etc. are increased by narrower streets, unless of course those people are selectively "*mandated*" (a favorite government word these days) to *not use* those streets. *Encouraging more personal responsibility* and mature use of existing energy source (enough with the "mandating"!), whether renewable or not, is the more desirable approach in my opinion.

This aside, I happen to believe that the values of 'renewable energy sources' are oversold and they are oversold because the whole carbon – emission – global warming-climate change scare has been oversold – *almost*, in my opinion, to the point of

fanaticism. In addition, the cost, efficiency and time for development of "renewable energy resources" has been grossly and irresponsibly *underestimated*.

Before you dismiss *these politically incorrect* concerns and opinions, I would appreciate your reading the referenced article with reasonable objectivity. The article was published in the IEEE Spectrum of July 2012. It is written by **Vaclav Smil, a distinguished professor in the department of environment and geography at the University of Manitoba, in Canada**. The article attempts to put the whole task of implementing "renewable energy" into proper, more realistic context. The article can also be viewed at:

<http://spectrum.ieee.org/energy/renewables/a-skeptic-looks-at-alternative-energy/0>

Respectfully,

Frank Diani
Goleta CA.

~~~~~`

FYI:

~~~~~Opening paragraph ....

A Skeptic Looks at Alternative Energy

(IEEE Spectrum, July 2012; pp 46-52)

<http://spectrum.ieee.org/energy/renewables/a-skeptic-looks-at-alternative-energy/0>

It takes several lifetimes to put a new energy system into place, and wishful thinking can't speed things along

By Vaclav Smil / July 2012

In June 2004 the editor of an energy journal called to ask me to comment on a just-announced plan to build the world's largest photovoltaic electric generating plant. Where would it be, I asked—Arizona? Spain? North Africa? No, it was to be spread among three locations in rural Bavaria, southeast of Nuremberg.

I said there must be some mistake. I grew up not far from that place, just across the border with the Czech Republic, and I will never forget those seemingly endless days of summer spent inside while it rained incessantly. Bavaria is like Seattle in the United States or Sichuan province in China. You don't want to put a solar plant in Bavaria, but that is exactly where the Germans put it. The plant, with a peak output of 10 megawatts, went into operation in June 2005.

It happened for the best reason there is in politics: money. Welcome to the world of new renewable energies, where the subsidies rule—and consumers pay.

~~~~~



**Community  
Environmental  
Council**

26 West Anapamu St., 2nd Floor  
Santa Barbara, CA 93101  
tel: 805.963.0583 fax: 805.962.9080 • [www.cecsb.org](http://www.cecsb.org)

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*CEO/Executive Director*

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August 2<sup>nd</sup>, 2012

Barbara Shelton

City of Santa Barbara CDD Planning Division

P.O. Box 1990 Santa Barbara, CA 93102

By Electronic Mail c/o [bshelton@santabarbaraca.gov](mailto:bshelton@santabarbaraca.gov)

**RE: City of Santa Barbara Draft Climate Action Plan**

Dear Barbara Shelton,

The Community Environmental Council (CEC) is a solutions oriented environmental non-profit, operating in Santa Barbara since 1970. We focus entirely on clean energy – renewable energy, sustainable transportation, and energy efficiency, and thus take great interest in the City of Santa Barbara's Draft Climate Action Plan. We've thoroughly reviewed the Plan and strongly support City of Santa Barbara efforts to reduce greenhouse gas emissions (GHGs) to the maximum extent possible, and fully implement all 68 measures in the Climate Action Plan (CAP). We also urge the City to set a higher target for GHG reductions and implement new measures as they become feasible.

The CAP shows that the City of Santa Barbara is on track to reach State AB 32 goals of reducing 2020 emissions to 1990 levels. Though the City may be meeting the letter of the AB 32 law, we are far from meeting the spirit of the law. While the City has made impressive strides toward GHG reductions through many worthwhile projects, the main reasons we are reaching the 1990 levels is because the City has low population growth and benefits from state actions such as the Renewable Portfolio Standard and Clean Car Rules. In fact, while the State is projected to grow 40% from 29.8 million people in 1990 to 41.7 million in 2020, the City's population is only increasing 7.6%, from 85,550 residents in 1990 to a projected 92,064 in 2020. Thus, faster growing cities in California must do much more to reduce GHG emissions to 1990 levels, whereas the City of Santa Barbara seems content to rest on our laurels. We were alarmed during discussions at the Sustainability Committee to hear Councilmembers asking why the City is even producing a CAP if we are on track to meet 1990 levels.

CEC urges the City to at least do as much as the average California city and set a more ambitious GHG reduction target. A 35% reduction from 1990 levels by 2020 would put us in the middle of the pack in terms of doing our per capita fair share, considering California's projected population growth. We urge the City to set a more ambitious goal of 50% below 1990 levels by 2020 that reflects our status as a green minded community and the birthplace of the environmental movement.

The CAP lays out many policies that collectively bring the City to 20% reductions by 2020 and 36% reductions by 2030. The City should pursue all these policies and build on them. For example,

**FOSSIL FREE BY '33**

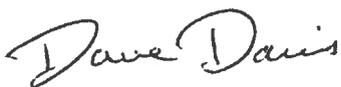
three of the largest policies, Alternative/Advanced Fuels (48,811 metric tons), Community Choice Aggregation (20,101 metric tons), and Parking Policies (31,466 metric tons) account for 72% of the calculated 138,561 metric tons reductions by 2020. These three large, community wide measures could be prioritized, focused on, and strengthened.

For example, with Alternative/Advanced Fuels, the City of Santa Barbara could accelerate efforts to make Santa Barbara a top adopter of electric vehicles (EVs, which currently reduce GHG emissions by 75% per mile compared to a gas car, and will improve as the grid gets cleaner in 2020). Reports from Nissan show that Santa Barbara is one of the top per capita markets for orders of the Nissan LEAF EV. The City of Santa Barbara could build on this by instituting policies to make Santa Barbara one of the most EV friendly cities in the country. While the City has recently installed eight charging stations, has EVs in the City fleet, and is considering new EV friendly policies, the City could accelerate these efforts by adding additional charging stations (including DC Fast Charging stations) at City owned parking garages, passing ordinances to pre-wire new and retrofitted buildings for charging stations, add additional EVs to the city fleet, and work with EV advocates to adopt all the recommended measures in the Plug in Central Coast EV Readiness Plan. While we are a small city, we could become an EV leader as the State of California seeks to have 1.5 million EVs in California by 2025.

For Community Choice Aggregation (CCA), the calculation of 20,101 metric tons was calculated by going from Southern California Edison's target of 33% renewables by 2020 to a modest 40% target. The Marin Clean Energy Authority, which started a CCA in 2010, is currently delivering 50% renewable energy to all customers at a lower cost than PG&E, and has a 100% renewable "Deep Green" option that over 1,000 accounts have signed up for. They are now expanding to allow other California cities outside Marin to join the program.

In summary, in order to follow the spirit of AB32, the City of Santa Barbara should set a target of at least 35% reductions from 1990 levels by 2020. This would position the City as doing our fair share of the average amount that other California cities are doing, considering the larger population growth that is occurring in other regions. CEC strongly urges the City to set a more ambitious goal of 50% that reflects our status as a green minded community and the birthplace of the environmental movement. This goal is achievable by implementing community scale programs that have been proven in other regions, along with building on the many successful environmental projects that the City has already undertaken.

Sincerely,



Dave Davis  
Executive Director



Michael Chiacos  
Transportation Manager



1836 State Street, Santa Barbara, CA 93101; (mail) P.O. Box 90106, Santa Barbara, CA 93190  
Telephone (805) 965-7570; fax (805) 962-0651

August 6, 2012

Barbara Shelton  
City of Santa Barbara CDD Planning Division  
Mail: P.O. Box 1990  
Santa Barbara, CA 93102

**Re: Draft Santa Barbara Climate Action Plan**

Dear Ms. Shelton:

Heal the Ocean has had an opportunity to review the City of Santa Barbara's recently released Draft *Climate Action Plan* (CAP), together with the Santa Barbara Sea Level Rise Study (Griggs & Russell 2012) included in the CAP Volume 2 Appendices. We appreciate that while the City General Plan and the two Assembly Bills (32 and 375) focus heavily, as they should, on the reduction of carbon emissions, we are acutely concerned with the local impacts of sea level rise and greatly appreciate any specific attention the City can focus on this issue. Santa Barbara is, after all, a coastal city, and all coastal cities must be one step ahead of inland areas when it comes to sea level rise, particularly when sea level rise is combined with correlative groundwater rise, together with the predicted increase of storm events and coastal flooding. The impact to water quality is obvious.

**General Comment**

Heal the Ocean commends the City of Santa Barbara for its progress on a host of sustainability goals, including those specifically targeted at addressing global climate change. While our region only represents a very small contribution to total global emissions of greenhouse gases, it is still critical that we take proactive steps towards mitigating our GHG footprint in conjunction with other cities, states, and nations across the world. We look forward to the City continuing to build on past progress in ensuring that Santa Barbara upholds its commitment to the environment and the wellbeing of its citizens by implementing programs that will encourage the adoption of clean energy technologies.

While the mitigation of greenhouse gas emissions is a critical part of the global climate change puzzle, the draft CAP rightly recognizes, and also gives credence to, the necessity in addressing the *impacts* of climate change. In addressing adaptation to climate change, it is critical to note that the globe will experience *some* level of impacts due to a warming climate, even if we were to completely halt global emissions today.

Thus, it is not a matter of "if" anymore, but "when." – and most importantly, by how much. Sea levels will rise along Santa Barbara's coast, and groundwater will meet sea water.

Given the fact that Santa Barbara is a coastal city that will be impacted by a rising ocean, sea water intrusion, and coastal storm events, the draft CAP is tremendously vague in outlining specific areas of concern, and this vagueness, we feel, will leave the City wholly unprepared to prepare and respond to the dangers ahead. It is not too soon to list specific locations, areas, concerns and policies, such as those that guide building and planning. Under each area of concern, location and policy, there should be a list of the technologies and/or remedies that must be considered for immediate scientific inquiry, political, strategic work and even conceptual and/or feasibility engineering. This work should start now.

The timelines considered in the “Adaptation Strategies” of the Draft CAP are arbitrary, and in fact, may encourage a dangerous ennui. By 2020 the City will conduct a sea level rise risk assessment and vulnerability analysis (even though one was already just completed by Griggs & Russell), and after that it will consider short-term effects (from storms), intermediate-term effects (to 2050) and long-term effects (to 2100).

These benchmarks are unpredictable, because scientists are not quite certain how fast sea level rise will occur. As this letter is being written the news has hit that a giant Greenland iceberg, about 46 square miles in size, has broken off from the Petermann Glacier in northwest Greenland and is now heading to sea. The real problem, scientists say, is that this breakup weakens the ice shelf, and when ice shelves weaken or collapse entirely, as has happened in this instance, glaciers speed up, moving more ice off of land and into the ocean, with long term impacts on rising global sea levels. News reports on this event state that scientists predicted the breakup for summer 2012 with some accuracy, but that the breakdown of the Greenland ice as a whole is causing new concern. Even if the City of Santa Barbara didn’t have unpredictability to deal with, we know for certain that by 2100 – 88 years from now – Cabrillo Blvd., the El Estero Wastewater Treatment Plant (WWTP) and the Airport will be at serious risk for flooding due to considerable sea level rise.

It would save the City countless hours of investigation, planning and repositioning if its Adaptation Strategies started from the top down – in other words, from 2100. The City should conclude that it needs to start the planning process NOW for moving infrastructure (would we have spent so many millions rebuilding the Airport if we knew it would be unusable in 88 years – or potentially less?). The City needs to start the policy process NOW for building permits in expected floodplains. Establishing “mandatory rolling setbacks that move landward over time for future development or significant redevelopment in areas likely to be affected by sea level rise inundation within the expected lives of the structure”<sup>1</sup> in the Adaptation Strategies section 86a means that in the next eight years the City might approve development that could be flooded 80 years later?

On Page 52 of the Griggs & Russell Study a risk probability chart indicates that the inundation of Santa Barbara’s low lying areas from 2050 to 2100 is rated HIGH.<sup>2</sup> Instead of a program of assessing and reassessing down the road, should the City not begin to identify land for a new Airport, a new wastewater plant, etc. today? If building permits are allowed in the floodplain (old Estero area) now,

<sup>1</sup> City of Santa Barbara. *Draft Climate Action Plan*. Community Development Department – Planning Division. June 2012, p. 3-29. <<http://www.santabarbaraca.gov/NR/rdonlyres/14B57AB5-BAAF-49A8-9935-0D80B93ED32E/0/ClimateActionPlanforPrint.pdf>>.

<sup>2</sup> Griggs, Gary, and Nicole L. Russell (University of California, Santa Cruz). 2012. *City of Santa Barbara Sea-Level Rise Vulnerability Study*. California Energy Commission. Publication number: CEC-500-2012-XXX, p. 52. <<http://www.santabarbaraca.gov/NR/rdonlyres/D8DD2C50-3E0E-4DA5-A323-0C4F8B4CDF06/0/AppendixBwithCover.pdf>>.

should they require deeper footings/pilings, in the style of Mexico City, which is built on a lake), and should groundwater remediation plans not be mapped out immediately?

One realizes the unpopularity of immediate action. When Santa Barbara's Historic Landmarks Committee voted in 2007 to approve a "Thin Blue Line" project, wherein a light blue line 1,000 feet long would be striped throughout downtown Santa Barbara to show where the sea would rise if Greenland were to melt as a result of the global warming scenario presented in Al Gore's "An Inconvenient Truth," the proposal was met with immediate outrage – mostly from developers and realtors worried that such an artistic statement might diminish property values on the ocean side of the line. The idea was scrapped.

The propensity for procrastination on this issue is going to have to be abandoned, and the sooner the better. Buildings are supposed to last longer than 80 years, and so is the Airport. It is time for the public to realize that this is a problem of tremendous magnitude, and although it is not in our back yard today, it is coming and we need to start *specific* planning. Here is, as Heal the Ocean sees it, a partial list of subjects that should have been addressed from the standpoint of year 2100:

- **Flooding of the El Estero Wastewater Plant;**
- **Flooding of the Santa Barbara Airport (and coincidentally, the Goleta Sanitary District);**
- **Contaminated groundwater surfacing and mixing with ocean water in the City's old Estero and waterfront areas (among other areas);**
- **Buildings condemned, land unusable;**
- **Buried infrastructure – electricity, gas, sewer – flooded;**
- **Surf and storm damage to private and municipal waterfront properties.**

Heal the Ocean sits on the Climate Change committee of the Santa Barbara County Integrated Regional Water Management (IRWM) program, which uses Vulnerability Assessment Checklist. Before revising the Draft CAP into its final version, we recommend that the City consider their checklist, which includes:

- Salt intrusion into coastal aquifers
- Increased wildfires
- Infrastructure (residences, recreation, water and wastewater treatment, tourism and transportation) at less than 6 feet above mean sea level
- Current flooding during extreme high tides or storm surges
- Critical infrastructure within the 200-year floodplain
- Erosion & Sedimentation

Finally, **the City's Planning Commission Staff Report of July 12, 2012**, prepared for its public hearing on July 19, 2012, is a 15-page document mainly focused on the City's strategies for carbon reduction. These measures are fine and good; however, this staff report would have been strongly questioned by Heal the Ocean during that public hearing, which we unfortunately could not attend. Had we been there, we would have stated our puzzlement at Staff's list of Strategies, Target Date and Cost Considerations for a host of items, including a Part III Climate Change Adaptation List. There is on this list "Planning for adaptation," so perhaps the issues raised in this comment letter, and other serious adaptation issues, will be considered at this point (2020? 2030?).

But under “Public Services” there are issues such as “Local food cultivation,” “Community gardens,” and “Regional Agriculture” – and NOTHING on wastewater treatment, wastewater infrastructure or the Airport. This is unacceptable! On Page 3-11 of the CAP the following statement is made:

*“Much greater projected sea level rise in the period to the year 2100 (40-55 inches) could cover much of the waterfront area and into low-lying inland areas and the report deems the future impact to be of high probability and magnitude. Public facilities such as the El Estero Waste Water Treatment Plant and coastal roads would become vulnerable. The probability of increased flooding and permanent inundation on the Airport property by 2100 is rated very high.”*

Why wouldn't the Staff Report at least put these issues on the list? Heal the Ocean maintains that these issues are more important than “Community gardens” and “Local food cultivation.”

### Specific Comments

#### El Estero Wastewater Treatment Plant

The El Estero Wastewater Treatment Plant (WWTP) is one of many treatment plants along the U.S. coastline to be threatened by sea level rise. Several recent studies, including the City's own 2009 *Plan Santa Barbara*, indicate that the WWTP is vulnerable under long term sea level rise scenarios. Given the evidence, the Climate Action Plan CAP) must lay out more specific plans – from the standpoint of the Year 2100.

The potential impacts of WWTP flooding were outlined in a 2009 Pacific Institute report, *The Impacts of Sea-Level Rise on the California Coast*, “[i]nundation from floods could damage pumps and other equipment, and lead to untreated sewage discharges. Besides the flood risk to plants, higher water levels could interfere with discharge from outfalls sited on the coast.”<sup>3</sup> It doesn't need to be stated that discharges of untreated sewage for even a short period of time could lead to serious degradation of coastal waters.

The City's 2009 *Plan Santa Barbara* states that “[w]hile it does not appear likely that the plant could be subject to flooding with modest rises in sea level, projections show that the El Estero facility would be increasingly vulnerable over time to a 100-year flood event with a 4.6-foot sea-level rise.”<sup>4</sup> The Plan Santa Barbara's corresponding map also offers a compelling visual addendum to the preceding excerpt:

<sup>3</sup> Heberger, Matthew, et al. *The Impacts of Sea-Level Rise on the California Coast*. The Pacific Institute, May 2009, p. 62. <[http://www.pacinst.org/reports/sea\\_level\\_rise/report.pdf](http://www.pacinst.org/reports/sea_level_rise/report.pdf)>.

<sup>4</sup> City of Santa Barbara. Certified Final Program Environmental Impact Report for the *Plan Santa Barbara* General Plan Update – Volume I. AMEC Earth & Environmental, Inc., Sept. 2010, p. 18-11. <[http://www.youplansb.org/docManager/1000000694/18.0\\_Global\\_Climate\\_Change.pdf](http://www.youplansb.org/docManager/1000000694/18.0_Global_Climate_Change.pdf)>.

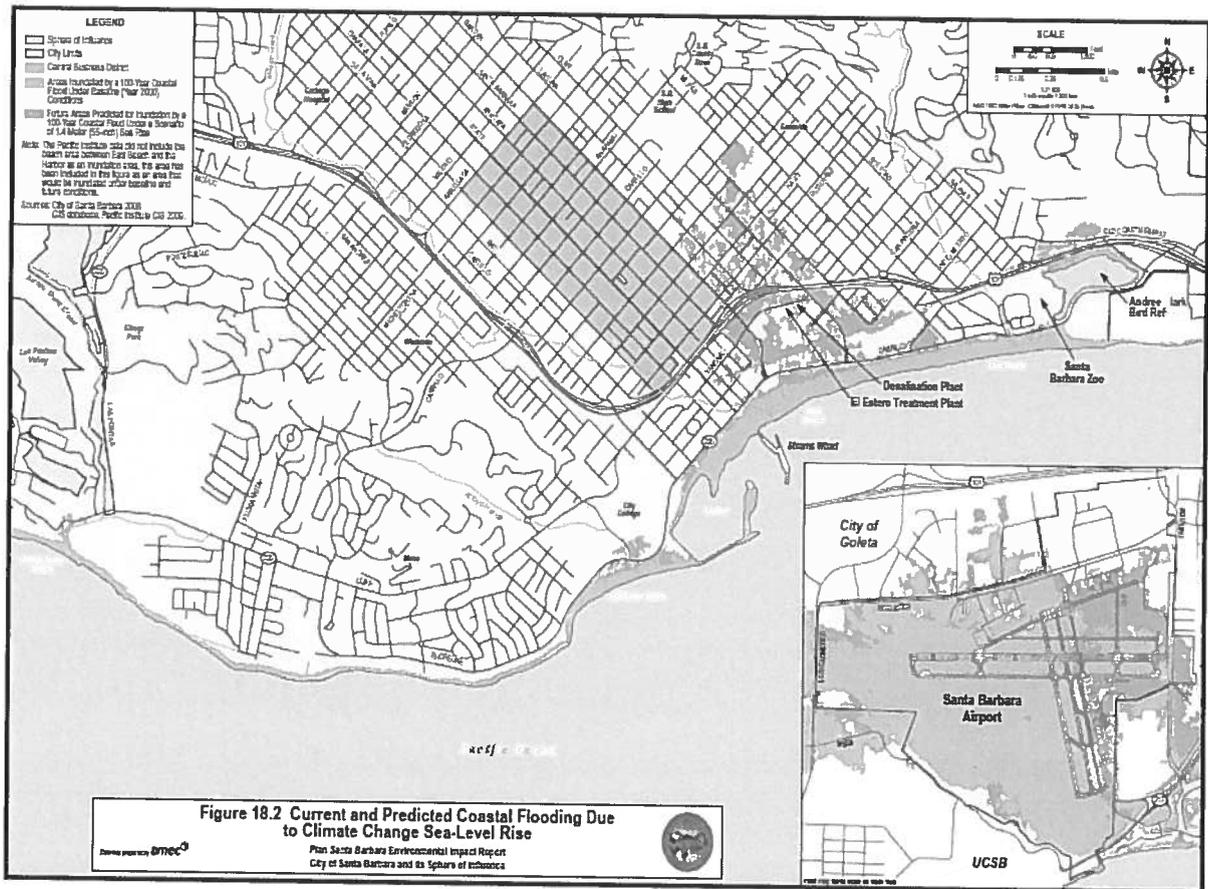


Figure 18.2 from Chapter 18 of Plan Santa Barbara<sup>5</sup>

Even if communities are indulging in “rollback” planning, Heal the Ocean believes Santa Barbara should not treat the flooding of the El Estero Wastewater Treatment Plant as a long-term planning concern. The City needs to begin looking at alternate technologies, alternate (higher) land areas for settling ponds, waterproofing equipment or facilities that cannot be abandoned, and so forth. According to the Pacific Institute study, 28 of California’s coastal wastewater treatment plants are “vulnerable to a 100-year flood event with a 1.4 m sea-level rise,”<sup>6</sup> and among the 28, Santa Barbara’s El Estero Treatment Plant is identified as being vulnerable under such a sea level rise scenario. The following map illustrates the extent of risk posed by sea level rise to California’s treatment plants:

<sup>5</sup> Ibid., p. 18-9.

<sup>6</sup> Heberger, Matthew, et al. *The Impacts of Sea-Level Rise on the California Coast*. The Pacific Institute, May 2009, p. 62. <[http://www.pacinst.org/reports/sea\\_level\\_rise/report.pdf](http://www.pacinst.org/reports/sea_level_rise/report.pdf)>.

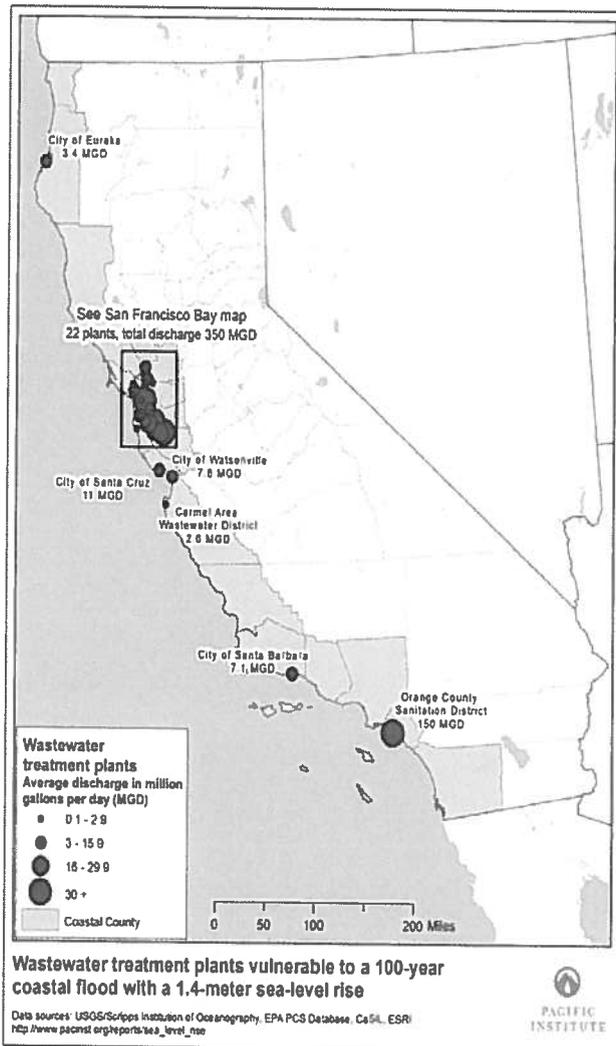


Figure 24 from the Pacific Institute Sea Level Rise Study<sup>7</sup>

Unfortunately, the CAP does not lay out sufficient measures to adapt to these risks. In fact, the Plan only recommends “*Adaptation approaches*,” implying that they may or may not be ultimately implemented. Even the “*approaches*” are vague, e.g.:

*Adaptation approaches: Additional detailed assessment of future area effects; programs addressing vulnerable resources currently located at water level, e.g., strengthening in place or elevation of infrastructure such as transportation, breakwater, pier, wharf, and buildings; or phased relocation; land use policies and standards for new development”<sup>8</sup>*

When? Where? How? Simply stating that the City will implement “programs addressing vulnerable resources” does not offer a rigorous enough plan for adapting to climate change.<sup>9</sup>

<sup>7</sup> Ibid., p. 63.

<sup>8</sup> City of Santa Barbara. *Draft Climate Action Plan*. Community Development Department – Planning Division. June 2012, p. 3-11. < <http://www.santabarbaraca.gov/NR/rdonlyres/14B57AB5-BAAF-49A8-9935-0D80B93ED32E/0/ClimateActionPlanforPrint.pdf>>.

<sup>9</sup> Ibid.

The CAP Appendix 2 Griggs & Russell study states that “sea-level may necessitate the modification of plant facilities or operations in the **coming decades** [emphasis added].”<sup>10</sup> While this is clearly a long term problem, that does not exclude planning in the short to medium term.

**Given the evidence cited above, it is clear that sea level rise poses a serious threat to the City’s wastewater infrastructure. The City must more clearly spell out its strategy to address these issues within this iteration of the *Climate Action Plan*. The CAP needs to offer more specifics on this question, at least a list of strategies to be studied in the immediate future.**

### **Flooding of the Airport**

This issue is briefly addressed in our General Comment, above. Why wouldn’t the CAP at least list the issue of alternate sites? The current Airport will be flooded by 2100. Was it prudent to rebuild the Airport in its present location, and where should it go next?

### **Sea Level Rise and Groundwater**

The ebb and flow between ocean and groundwater is well known. Many coastal communities are already addressing seawater intrusion by injecting recycled water into the groundwater. In 2009, the USGS published a report, *Sources of Fecal Indicator Bacteria in Urban Streams and Ocean Beaches*, J.A. Izbicki et al., which examines this hydrologic connection. Performed in conjunction with the City of Santa Barbara and with contributory funding from Heal the Ocean, the study (2005-2007) is one of the first serious examinations of the relationship between groundwater contamination and the ocean, and made the definitive conclusion that when the ocean comes in, groundwater levels go up.

The City of Santa Barbara has shallow groundwater areas all throughout its boundaries, particularly in the old Estero area (see again **Figure 18.2 from Chapter 18 of the *Plan Santa Barbara***<sup>11</sup> reproduced above). It is not just the ocean that will rise and flood the coastline, the accompanying rise in groundwater will occur, and instead of joining together under the land, it will take place on the surface. As we will mention later in this comment letter, the City planning (and *Plan Santa Barbara*) needs to begin now to limit, or prohibit, building in the old Estero area.

**Submerged infrastructure:** The issue of rising groundwater levels due to sea level rise needs serious examination in the *Climate Action Plan*. An overlooked issue is the flooding of underground infrastructure – sewer, electric and gas lines. A recent USGS study of New Haven, Connecticut, which, in most areas, is 30 feet or less above sea level, found that a 3 foot rise in sea level could possibly “inundate underground infrastructure,<sup>9</sup> flooding basements and submerging sewer pipes and utility lines that deliver water and electricity.”<sup>12</sup>

<sup>10</sup> Griggs, Gary, and Nicole L. Russell (University of California, Santa Cruz). 2012. *City of Santa Barbara Sea-Level Rise Vulnerability Study*. California Energy Commission. Publication number: CEC-500-2012-XXX, p. 38. <<http://www.santabarbaraca.gov/NR/rdonlyres/D8DD2C50-3E0E-4DA5-A323-0C4F8B4CDF06/0/AppendixBwithCover.pdf>>.

<sup>11</sup> City of Santa Barbara. Certified Final Program Environmental Impact Report for the *Plan Santa Barbara* General Plan Update – Volume I. AMEC Earth & Environmental, Inc., Sept. 2010, p. 18-9. <[http://www.youplansb.org/docManager/100000694/18.0\\_Global\\_Climate\\_Change.pdf](http://www.youplansb.org/docManager/100000694/18.0_Global_Climate_Change.pdf)>.

<sup>12</sup> Johnson, Lacey. *Rising Groundwater May Flood Underground Infrastructure of Coastal Cities*. Scientific American, May 2012. <<http://www.scientificamerican.com/article.cfm?id=rising-groundwater-may-flood-underground-infrastructure-of-coastal-cities>>.

**It is critical that the City of Santa Barbara CAP outline a strategy for the flooding of its underground infrastructure – sewer, electric and gas lines – by rising groundwater levels.**

Groundwater, which rises with sea level rise, is already shallow in a good portion of City boundaries, particularly where the old Estero used to be (behind the El Estero Wastewater Treatment Plant) and graphically outlined in color map of **Figure 18.2 from Chapter 18 of the *Plan Santa Barbara***.<sup>13</sup>

### **Groundwater Contamination and Flooding**

Another serious issue of groundwater rise that will eventually cause flooding and mixing of groundwater with ocean water, is the level of contaminants in shallow groundwater throughout the City of Santa Barbara, particularly in the waterfront area and the old Estero. The State Water Resources Control Board's (SWRCB) Geo Tracker program has mapped the City's groundwater wells, each of which are monitored for levels of contamination of PCEs, TCEs, benzene (a carcinogen), 1,2-dichloroethane, toluene, xylenes, MTBE, t-butyl alcohol and other contaminants in shallow groundwater plumes beneath the City. A groundwater rise will lift these contaminants to the surface, mix with the ocean, and flooding of property will become a bigger issue than that of mere flooding.

To illustrate, we superimposed Figure 18.2 from Chapter 18 of the *Plan Santa Barbara*<sup>14</sup> over the SWRCB Geo Tracker map (below). It is obvious that rising groundwater containing the contaminants listed above will not only be coming to the surface, but mixing with the ocean.

The good news is that Heal the Ocean is spearheading a project in which the Regional Water Quality Control Board hazmat staff and Santa Barbara County Fire Site Mitigation Unit (hazmat) will be prioritizing these contaminated sites for cleanup. *Plan Santa Barbara* – and the CAP – should take into consideration the results of this project, to help in mitigation of the deleterious effects of groundwater rise.

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<sup>13</sup> City of Santa Barbara. "Certified Final Program Environmental Impact Report for the *Plan Santa Barbara* General Plan Update – Volume I." AMEC Earth & Environmental, Inc., Sept. 2010, p. 18-9.  
<[http://www.youplansb.org/docManager/1000000694/18.0\\_Global\\_Climate\\_Change.pdf](http://www.youplansb.org/docManager/1000000694/18.0_Global_Climate_Change.pdf)>.

<sup>14</sup> Ibid.

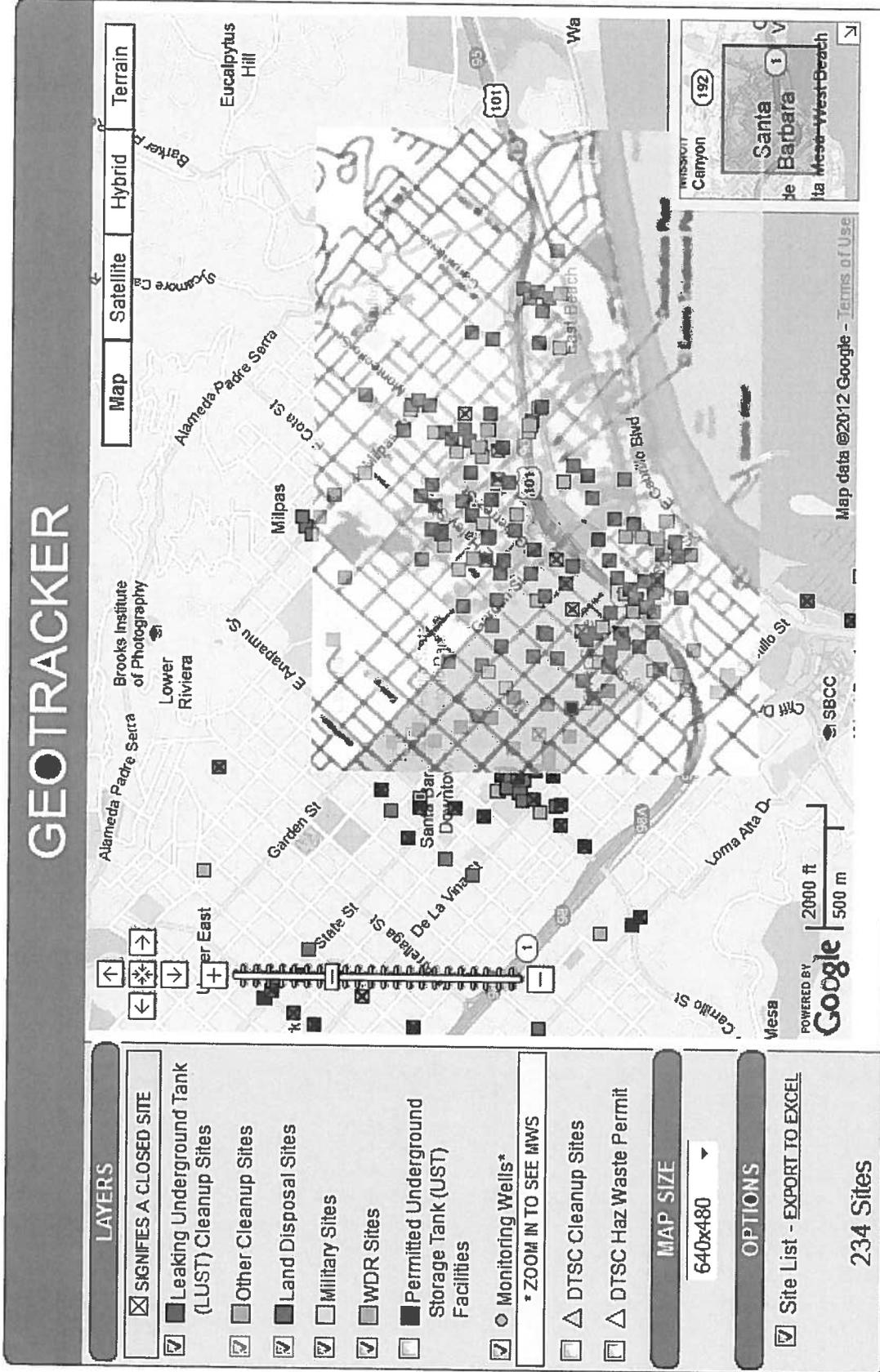


Figure 18.2 from Chapter 18 of Plan Santa Barbara <sup>15</sup> Superimposed over Santa Barbara Geotracker Map

<sup>15</sup> City of Santa Barbara. "Certified Final Program Environmental Impact Report for the Plan Santa Barbara General Plan Update – Volume I." AMEC Earth & Environmental, Inc., Sept. 2010, p. 18-9. <[http://www.youplansb.org/docManager/1000000694/18.0\\_Global\\_Climate\\_Change.pdf](http://www.youplansb.org/docManager/1000000694/18.0_Global_Climate_Change.pdf)>.

**Buildings (or rebuilding) in the Flood Plain**

As mentioned earlier in this comment letter, the planning and building permitting departments of the City of Santa Barbara should not be waiting to see how things go in the matter of sea level rise. Should underground garages be permitted if they are to flood? (Some underground garages and City underpasses are already flooding). Should deeper pilings be required? *Should the City allow the construction of buildings and/or facilities that will very likely be flooded within 88 years?* A construction policy procedure should be started now, so that the City is protected in the future.

**Cabrillo Blvd and Shoreline**

The coastline of the actual City boundaries is not altogether so enormous that areas of concern other than Cabrillo Blvd. and Shoreline should be listed, with problems identified and possible remedies for those problems at least stated. The Pros and Cons are already known for Seawalls, Rock Installation, and the moving of Sand. These methods should be outlined in the CAP, with Pros & Cons for each, specific to the location. In relation to continual sand movement to establish berms and barriers, the environmental effects of dredging need to be studied, and this issue should at least be mentioned in the CAP.

**Conclusion**

In conclusion the Draft Climate Action Plan is unfortunately not a plan. It is a list of considerations, sandwiched into a 2020/2050 framework outlining when more considerations will be made before the almost certain flooding that will come in 2100. We encourage the writers of this document to go back to the studies contained in the Appendices and this letter, and start with the Year 2100 to develop a list of action items. We believe that working from the assumption that flooding is an imminent dilemma will ultimately save the City of Santa Barbara time, money and guesswork. More importantly, it will prevent disaster.

Thank you for considering our comments.

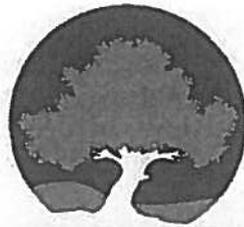
Sincerely,



Hillary Hauser, Executive Director



James O. Hawkins, Associate Researcher



**environmental**  
**DEFENSE CENTER**

August 6, 2012

Barbara Shelton  
City of Santa Barbara CDD Planning Division  
P.O. Box 1990  
Santa Barbara, California 93102

**RE: City of Santa Barbara Draft Climate Action Plan**

Dear Ms. Shelton,

The following comments on the City of Santa Barbara's Draft Climate Action Plan (CAP) are submitted by the Environmental Defense Center (EDC). EDC is a non-profit public interest law firm which represents community organizations in environmental matters affecting California's south central coast.

The City's General Plan calls for the preparation of a comprehensive climate action plan which, in compliance with the California Global Warming Solutions Act (AB 32), would "address climate change concerns including reducing green-house gas [GHG] emissions, green-house gas absorption, and adaptation to climate change."<sup>1</sup>

The Draft CAP appropriately characterizes the impacts and risks associated with global climate change. The CAP does not, however, entirely conform to its stated objectives. For example, the Draft CAP does not appear to include specific measures to address GHG absorption, as required by the General Plan. Similarly, while the Draft CAP references AB 32, it is not adequately responsive to statewide directives such as Executive Order S-3-05 (Schwarzenegger), which sets forth the following greenhouse gas emission reduction targets: (1) by 2010, reduce GHG emissions to 2000 levels; (2) by 2020, reduce GHG emissions to 1990 levels; and (3) by 2050, reduce GHG emissions to 80 percent below 1990 levels.

It is encouraging to note that "the Santa Barbara community has already met the 2020 and 2030 carbon emissions targets" outlined by AB 32. In order to fully encompass state goals, however, the CAP should include strategies for reducing our current GHG emissions to 80 percent below 1990 levels.

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<sup>1</sup> 2011 Environmental Resources Element, Policy ER1.

August 6, 2012

EDC re: City of Santa Barbara Draft Climate Action Plan

Page 2 of 2

The CAP should not be a paper exercise, such that it merely tallies our City's past successes and references ongoing programs aimed at reducing GHG emissions. Rather, the CAP should be a forward-looking document which improves upon these efforts and explicitly conforms to both the General Plan and state law.

Please adopt a CAP which will ensure that Santa Barbara continues to be a leader both for our region and for California.

Sincerely,

A handwritten signature in black ink, consisting of a stylized, cursive 'N' followed by a long horizontal stroke that curves upwards at the end.

Nathan G. Alley  
Staff Attorney



Santa Barbara County  
Air Pollution Control District

RECEIVED

AUG 06 2012

CITY OF SANTA BARBARA  
PLANNING DIVISION

August 2, 2012

Barbara Shelton  
City of Santa Barbara  
Community Development Department, Planning Division  
P.O. Box 1990  
Santa Barbara, CA 93101

Re: **APCD Comments on City of Santa Barbara Draft Climate Action Plan**

Dear Ms. Shelton:

The Air Pollution Control District (District, or APCD) has reviewed the Draft Climate Action Plan (CAP), which addresses climate change issues for the City of Santa Barbara community in the current period to the year 2030, in accordance with directives of the Santa Barbara General Plan and the California Global Warming Solutions Act (AB 32). The purposes of the CAP are to (1) reduce the rate of carbon emissions generation within the Santa Barbara community, and (2) plan for adaptation of Santa Barbara to climate change.

Air Pollution Control District staff offers the following comments on the Draft CAP:

1. **Section 1.0 Introduction, 1.2 Background, Page 1-13:** The discussion of Air District actions to address climate change is potentially misleading and should be revised. The District has not, to date, formally proposed greenhouse gas thresholds for actions where the District is the lead agency. The District has held meetings, workshops, and has made a presentation to the District's Community Advisory Council on this issue. A formal proposal has not been brought before our Board and greenhouse thresholds have not been adopted by the District.

To provide a more accurate description of Air District activities the paragraph under the "Air District" subheading should be revised as follows:

"In 2011, the Santa Barbara County Air Pollution Control District held a public workshop to discuss the development of greenhouse thresholds and potential threshold options, including options for a numeric threshold for stationary sources, proposed a greenhouse gas emissions standard for use in evaluating the environmental impacts of proposed large stationary sources within Santa Barbara County. The proposed threshold level would define a significant impact when a stationary source would generate 10,000 or more metric tons carbon dioxide (CO<sub>2</sub>) equivalent per year (MTCO<sub>2</sub>e/year). This would be used in conducting project environmental reviews required under the California Environmental Quality Act (CEQA)."

Other District activities related to climate change and greenhouse gas (GHG) emissions include the following:

- Incorporation of GHG emissions into large industrial source permits, as required by federal law;
- Updating and refining of the District's countywide GHG emissions inventory;

- Working with individual jurisdictions to quantify and mitigate GHG emissions associated with development projects;
  - Participation in working groups to update and improve GHG quantification and mitigation tools statewide;
  - Working with the California Air Resources Board to implement AB 32 Scoping Plan measures, as necessary.
2. **Section 2.0 Reduction of Carbon Emissions, 2.3 Carbon Emissions Reduction Strategies, Page 2-33:** CEQA Guidelines Section 15183.5, *Tiering and Streamlining the Analysis of Greenhouse Gas Emissions*, discusses the tiering of projects from a greenhouse gas reduction plan. Specifically, Section 15183.5(b)(1)(D) states that an adopted greenhouse gas reduction plan should “*Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level*”. Climate Action Plans typically include a mix of voluntary and mandatory measures to generate GHG reductions. Since the implementation of voluntary measures is not guaranteed, their corresponding reductions are more speculative than mandatory measures. Plans should strive to rely on mandatory measures to meet their GHG reduction targets, and/or measures should be adopted as Conditions of Approval for proposed projects to ensure that measures included in the CAP result in verifiable reductions.
  3. **Section 2.0 Reduction of Carbon Emissions, 2.3 Carbon Emissions Reduction Strategies, Page 2-33:** Large ships are responsible for substantial amounts of worldwide emissions of black carbon, nitrogen oxides (NOx), particulate matter, sulfur, air toxics, greenhouse gases, and substances that deplete ozone in the upper atmosphere. In addition, NOx and Volatile Organic Compounds (VOCs) from ship transits off the coast of Santa Barbara County represent nearly 50% of all ozone precursor emissions in the District emissions inventory. The District has been working to raise awareness of the problem and call for voluntary and regulatory measures to control these emissions. The District's current focus is on exploring the potential for vessel speed reduction in the Channel to achieve substantial reductions in shipping emissions. We appreciate the City's support of efforts to reduce marine shipping emissions, and if the City has any specific near-term goals to achieve reductions from shipping, we suggest you include them in the CAP.
  4. **Section 2.0 Reduction of Carbon Emissions, 2.4 Effectiveness of Strategies, Page 2-49:** There appear to be multiple arithmetic calculation errors in Figure 2-14. For example, the total emissions after adding the subtotal of each scope is 543,204 (447,205 + 93,694 + 2,305), not 502,008 as cited. Also, the Scope 1 Emissions subtotal after adding the various inputs is 449,510 not 447,205 as cited, and Scope 2 Emissions subtotal is 91,921 not 93,694 as cited. These discrepancies should be corrected to accurately portray the emissions forecast with implementation of the plan.
  5. **Section 2.0 Reduction of Carbon Emissions, 2.4 Carbon Emissions Reduction Strategies, Page 2-50-52 and Appendix A, Appendix A3, Page 7 and 10:** Estimates of emission reductions from Climate Plan Strategies should be supported with substantial evidence. Although the CAP includes the assumptions and calculations used to develop the emission reductions estimates for the Climate Plan Strategies, some strategies may be overestimating anticipated reductions.

Specifically, Page 7 of Appendix A3 discusses assumptions made for Strategy 3: *Energy-efficient building – voluntary actions*, and states that it was “*Assume[d] that 1% of City homeowners*

*utilize financing mechanisms to improve home energy efficiency, and that each home experiences a reduction in energy consumption of 40% as a result of extensive improvements.”* The assumption of energy savings from home improvements appears to be highly optimistic. The City should provide a basis for this percentage reduction in energy consumption, and assess whether it is realistic.

In addition, a significant amount of reductions are attributed to Strategy 8: *Community choice aggregation*. This measure consists of a feasibility study of a Community Choice Aggregation arrangement. Due to the speculative nature of this measure, it appears to be difficult to make assumptions regarding its performance and assign a specific amount of GHG emission reductions. The City should provide a sound basis for the emission reductions estimated for this measure and evaluate whether such a large amount of emission reductions is realistic and achievable.

6. **Section 2.0 Reduction of Carbon Emissions, 2.4 Effectiveness of Strategies, Page 2-53:** The value cited in Figure 2-16 as the Citywide *With Plan* Emissions Forecast in 2020 of 502,008 MTCO<sub>2</sub>e does not correspond with values cited elsewhere in the CAP such as in Figure ES-1 on page ES-4, in Figure 2-15 on page 2-52, and Appendix A3 on page 4. The value does match the Total Emissions presented in Figure 2-14, but as stated in Comment 4 above, this value appears to be incorrect.
7. **Section 3.0 Adaption to Climate Change, 3.1 Climate Change Effects, Page 3-7:** Under the “*Air Pollution*” subheading, it is stated that, “*Deposition of reactive nitrogen affects agriculture and natural habitat.*” Please provide additional explanation of how climate change contributes to this impact and what the resulting air pollution concern would be. Note that there are several other impacts of climate change that could affect air quality including increased risk of wildfire and drought leading to potentially higher particulate matter (PM) levels.
8. **Section 4.0 Implementation, Monitoring, and Update, 4.1 Implementation, Page 4-7:** The CAP asserts that an adopted Climate Action Plan can potentially remove or greatly reduce the need for specific projects to quantify and mitigate greenhouse gas emissions under the California Environmental Quality Act (CEQA).

The CEQA Guidelines amendments that were finalized in March 2010 create a mechanism for analysis and mitigation of greenhouse gas impacts at a program level. However, it is our understanding that if specific projects are not addressed and mitigated within the scope of the adopted program, additional greenhouse gas analysis and mitigation may still be required under CEQA. CEQA Guidelines Section 15183.5, *Tiering and Streamlining the Analysis of Greenhouse Gas Emissions*, discusses the tiering of projects from a greenhouse gas reduction plan. Specifically, Section 15183.5(b)(2) discusses the section’s use with later activities and states that:

*“A plan for the reduction of greenhouse gas emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the*

*effects of a particular project may be cumulatively considerable, notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, an EIR must be prepared for the project."*

9. **Appendix A, Appendix A1, Pages 7 and 10:** In reference to the effectiveness of Title 24 energy efficiency standards in future years, page 7 states that:

*"To be conservative, AMEC estimated that updated Title 24 standards will become effective every four years in 2014, 2018, and 2022, and that each update will have an additional increment of 50% of the effectiveness of the preceding update because fewer new sources of new reduction will be available. Some other documents which have attempted to account for future updates to Title 24 have assumed greater reductions from future updates (e.g., San Mateo County assumed 70% effectiveness from one update to the next), but this results in a change from baseline that appears to exceed a realistic rate of technological change."*

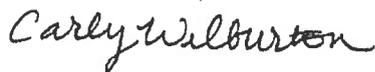
Page 10 then states that:

*"As described for natural gas consumption, projections account for revised State Title 24 energy efficiency standards. Again, to be conservative, AMEC estimated that updated Title 24 standards will become effective every four years in 2014, 2018, and 2022, and that each update will have an additional increment of 70% of the effectiveness of the preceding update because fewer new sources of new reduction will be available... This is consistent with other recent climate plan inventories that have accounted for remodels and updates in Title 24 standards, such as for the County of San Mateo."*

The statements made on page 7 and 10 are contradictory. The document should be revised with the utilization of a consistent methodology.

If you have any questions regarding these comments, please feel free to contact me at (805) 961-8890 or via email at [cvw@sbcapcd.org](mailto:cvw@sbcapcd.org).

Sincerely,



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cc: Project File  
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