



August 13, 2024

Santa Barbara County Supervisors
 105 East Anapamu Street, 4th Floor
 Santa Barbara 93101
 Via email: sbcob@countyofsb.org

RE: 2030 Climate Action Plan

Dear Santa Barbara County Supervisors,

We the undersigned representing thousands of County residents thank you for considering the updated Climate Action Plan (CAP), which outlines actions we can take to help meet the goal of reducing greenhouse gas emissions by 50% by 2030.

However, there is a significant omission: The greenhouse gas (GHG) inventory excludes emissions from oil and gas facilities. We are writing to ask you to direct staff to include these emissions in the GHG inventory.

The [draft CAP](#) states that these stationary source emissions from oil and gas facilities are, "excluded because the County lacks primary regulatory control over many of these facilities." (pg 22)

This is not an adequate rationale for exclusion because:

1. A GHG inventory should include all emissions, not just ones the County directly controls. The protocols for community GHG inventories are broad. For instance, *“Any physical process inside the jurisdictional boundary that releases GHG emissions into the atmosphere”* ([ICLEI US Community GHG Protocols](#) pg 15) or *“emissions occurring as a result of activities and consumption patterns of the city”* ([Global Protocol for Community-Scale Greenhouse Gas Inventories](#), pg 29) CEQA Guidelines section 15183.5(a) requires that plans to reduce GHG emissions should *“Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.”*
2. To comply with CEQA, the inventory must be complete. For instance, in *California Riverwatch vs. County of Sonoma*, the court found that Sonoma County's CAP violated CEQA in part because the "inventory of greenhouse gas emissions is based on insufficient information."
3. The fact that there are State or Federal regulations that apply to the operation of these facilities does not negate the County's ability to control emissions from their operation through its permitting authority. If emission sources the County primarily controls were the only ones included, there would be virtually no GHG inventory at all.

In fact, the CAP itself recognizes that the County influences these emissions. Page 40 of the CAP says, "The County does have a role to play in overseeing the oil and gas operations within its jurisdiction." And on page 41 it gives examples of what the County and City of Los Angeles are doing to phase out oil. Another example is Ventura County which requires electrification and prohibits venting and flaring of gas if feasible -- regulations that survived settlement with the oil industry and that will lower GHG emissions in the oil and gas sector.

Santa Barbara County regulates and permits oil and gas facilities. The County set a GHG threshold of significance of 1,000 metric tons CO₂e and has considered emissions in permitting decisions. At the Board of Supervisors meeting on June 27, 2023 when the draft Climate Action Plan was last discussed, there was unanimous agreement that County actions have led to a decline in emissions from the sector.

The exclusion of oil and gas emissions is a continuing omission dating back to the 2015 Climate Plan that enables the County to avoid considering industry emissions, but it provides a false picture of GHG emissions in the County. Our long-awaited 2030 Climate Plan should be both ambitious and accurate. As the UN's International Panel on Climate Change [reports](#), "The evidence is clear: the time for action is now. We can halve emissions by 2030...The next few years are critical." At this critical juncture, continuing to exclude and ignore a major GHG emissions source in the County is not acceptable.

Failing to include these emissions also makes the CAP non-CEQA compliant. Any county project that tries to rely on consistency with the CAP could be challenged based

on this omission. This will unnecessarily delay and handicap climate actions and makes the time and expense spent on the CAP CEQA compliance thus far a waste.

Please direct staff to include emissions from oil and gas production and processing in the GHG inventory in the 2030 Climate Action Plan and mitigation measures before it can be approved.

Regards,

Katie Davis
Chair, Sierra Club Santa Barbara-Ventura Chapter
Vice-Chair, Sierra Club California

Linda Krop
Chief Counsel
Environmental Defense Center (EDC)

Sigrid Wright
CEO/Executive Director
Community Environmental Council

Haley Ehlers
Executive Director
Climate First: Replacing Oil & Gas (CFROG)

Mati Waiya
Executive Director
Wishtoyo Foundation

Emiliano Campobello
Chair
Santa Barbara Standing Rock Coalition

Carla Mena
Director of Policy & Legislative Affairs
Los Padres ForestWatch

Irene Cooke
Organizer
Society of Fearless Grandmothers-SB

Brady Bradshaw
Senior Oceans Campaigner
Center for Biological Diversity

Lucas Zucker
Co-Executive Director
Central Coast Alliance United for a Sustainable Economy (CAUSE)

Craig Lewis
Executive Director
Clean Coalition

Sharon Broberg
Steering Committee Member
350 Santa Barbara

Ken Hough and Jeanne Sparks
Co-Executive Directors
SBCAN

Tomás Morales Rebecchi
Central Coast Organizing Manager
Food and Water Watch

John D. Kelley, Group Leader
Santa Barbara Chapter
Citizens Climate Lobby

Nancy Black
Board President
Committees for Land, Air, Water and Species (CLAWS)

Katherine Emery, Ph.D.
Executive Director
Santa Barbara Audubon Society

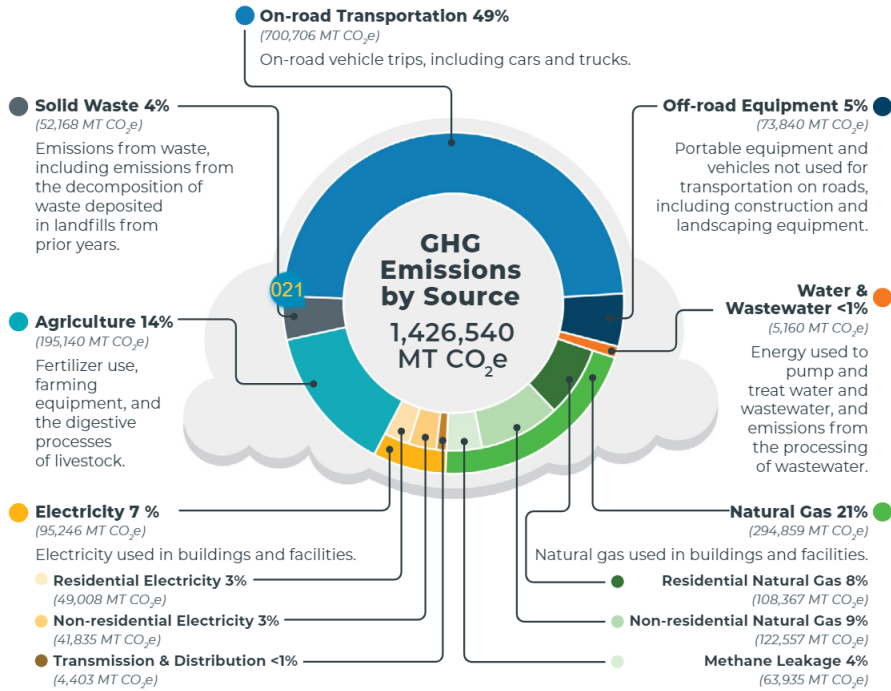
Wayne Morgan
Chair
Climate Reality Project, South Central Coast chapter

Ted Morton
Executive Director
Channelkeeper

Vivienne Chankai and Izzi Sistek
Advocacy Chairs
UCSB Environmental Affairs Board

Leah Stokes
Climate Policy Professor
UC Santa Barbara

FIGURE 3. 2018 Unincorporated County GHG Emissions by Source



For the purposes of this CAP, stationary sources are excluded because the County lacks primary regulatory control over many of these facilities.⁴ Percentages are rounded and do not add to 100%.

4. This CAP has been designed to be CEQA-qualified. The County does not have primary regulatory control over existing oil and gas facilities within its jurisdiction and thus, would not have substantial evidence to demonstrate an ability to reduce emissions and meet State and local targets if stationary sources, such as oil and gas operations, were to be included within its inventory.

Excluded emissions:

Stationary Source GHG Emissions - Summary				
	2008	2016	2018	2022
Electricity Importer	0	0	0	0
Electricity Generation	32,341	13,579	15,313	0
Oil and Gas Production	387,525	116,799	122,987	123,905
Other Combustion Source	56,496	113,552	36,170	110,290
Refinery	16,266	23,277	15,218	0
TOTAL	492,628	267,207	189,688	236,217

