



August 22, 2024

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

RE: Aug 27 Agenda Item #2: 2030 Climate Action Plan

Dear Santa Barbara County Supervisors,

The county's proposed [2030 Climate Action Plan](#) challenges the community to cut our emissions in half but leaves out the one industry most responsible for climate pollution — the oil and gas industry. The CAP should be amended to include stationary source emissions and reduction measures. This industry should do its part just like the rest of us.

The staff recommendation to pass a RESOLUTION – OIL AND GAS ACTIONS is a necessary first step that we support on the path towards a true CAP.

Draft plan discussion and clarification

At the Board of Supervisors meeting on June 27, 2023 when the draft Climate Action Plan was discussed, there was unanimous agreement that County actions have led to a decline in emissions from the oil and gas sector and at that time and you questioned why they were excluded from the GHG inventory:

- Supervisor Hartmann said, “We’ve excluded one source...Given that Ventura and LA County do it, it seems we want a complete picture, and we only have a partial picture.”
- Supervisor Nelson said, “In terms of stationary sources, we know locally we have brought down the GHG levels. Does that not come into consideration? ... I would think that if we’re talking about our county’s inventory, we could also have the benefit of good luck or good opportunities as well.”

At the time, staff explained that CEQA-qualified plans must have, “*measures that substantial evidence demonstrates would collectively achieve the specified emissions level.*” Since the CAP didn’t include measures to reduce stationary source emissions, those emissions were not included in the GHG inventory.

However, CEQA-qualified plans must tally GHGs “*from activities within defined geographic area,*” (See Final CAP, pg. 3) and oil and gas production and processing is an “activity.” The law firms that established case law around CEQA-qualified CAPs agree that stationary source emissions must be included. (See legal opinion submitted by CARSTENS, BLACK & MINTEER, among others.)

The fossil fuel placeholder page should include goals – as it does for everyone else

Page 45 of the CAP has a placeholder page to “*Limit the increase of fossil fuel extraction emissions and develop a sunset strategy.*” However, it states that, “*Goals are not included for this measure as there are no quantifiable actions with substantial evidence*”

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The action it does include, “Pilot Carbon Capture & Storage,” is [counterproductive](#) and could facilitate continued fossil fuel production and even be taken to mean using CO2 for enhanced oil recovery. And because stationary source emissions are not included in the GHG inventory, new projects could come online and drive emissions up without being counted at all. A single oil project could undo all our other efforts.

Ideas for stationary source GHG emissions reductions:

Given that one of the concerns about including stationary sources in the CAP was the local ability to reduce those, we have compiled some ideas below.

- Within the County permitting authority, ensure any oil and gas projects are consistent with County climate goal to cut emissions by 50% from 2018 levels by 2030
- Align the CAP with Governor Newsom's order to [phase out oil drilling in the state no later than 2045](#). For instance, LA County's recently adopted [2045 CAP](#) (adopted June 25, 2024) includes "Develop a Sunset Strategy for All Oil and Gas Operations." Note that we need to do more to help the state meet its goals. A [March 2024 report](#) found that California needs to triple its annual carbon emissions reductions to meet its 2030 target of a 48% cut below 1990 levels by 2030.
- Prohibit oil and gas facilities and production in high fire hazard zones. This will help reduce wildfire emissions—a huge health risk as well as GHG source. We have many examples of fires started by oil and gas, or fires threatening oil and gas facilities.
- Borrow from Ventura County's Climate Plan. Their General Plan went through [settlement](#) with the oil industry and 3200 foot setbacks are now state law. The regulations adopted in Ventura General Plan and [Climate Plan \(pg 52-53\)](#):
 - Setbacks (align with 3200 foot state law)
 - Electrically-Powered Equipment for Oil and Gas Exploration and Production
 - No trucking oil (settlement with oil companies added "if feasible")
 - No flaring or venting gas (settlement with oil companies added "if feasible")
- Borrow from Ventura County's work on increasing local surety/bonding amounts to reduce emissions from idle wells. Here is the [info page from the Planning Division](#) (Limited government oversight of idle wells is a known issue identified by the SB County 2021 Grand Jury report)

Santa Barbara County regulates and permits oil and gas facilities. It is possible to develop goals and measures to meet our GHG reduction goals for this sector in this county—just as has been done for the rest of the community.

Sincerely,



Katie Davis
Chair



Jonathan Ullman
Director