# Public Comments Received on 2024 Climate Action Plan

(March 22 – April 24, 2024)

Hello,

I appreciate the work that has gone into the plan, and I have only had time to skim a few sections. But I wanted to offer my perspective based on my experience as a resident of State St., a UCSB employee, and as a researcher of lithium and other minerals used in EVs.

Kind regards,

Javiera

I found Measure T-4 far too modest (almost sad really) compared to the vision in the Circulation Plan and the understanding that Transportation accounts for most of our local emissions.

Santa Barbara could have a rapid transit line running from the Arlington Theater to Storke Plaza, either as a tram line or a rapid bus on a dedicated lane, with smaller buses running to destinations from this main artery. Currently SBMTD buses are comfortable and reliable; increasing their frequency and designing routes to have some rapid ones along strategic corridors would be a game-changer. Parking could be provided on upper State (near junction with 154 for example, e.g., T-5.11) so drivers from further away leave their cars there and conduct the rest of their business with public transit. UpperStateSt is routinely ignored yet the traffic there is terrible.

Additionally, this Climate Action Plan should include plans to cooperate with the County, UCSB, and MOVE to design a county-wide public transit network. Transportation and Housing intersect and are together climate justice issues (T-5.5). A reasonable public transit system would allow UCSB staff, graduate students, and faculty to live further from campus without having to rely on personal vehicles which many cannot afford. As housing goes from unaffordable to criminally unaffordable, a growing number of UCSB staff, students and faculty live further away (Ventura, Lompoc, etc.); and many are taking available public transit (e.g., Amtrak). Ridership remains lower than it otherwise would be, however, because services are unreliable (Amtrak), infrequent (Clean Air Express), or slow (SBMTD from Carpinteria, for example). A good public transit system attracts more riders - this region has the potential to have a truly modern and user-friendly public transit system.

EVs have many local benefits, but they do not decarbonize the global economy nor are they just or equitable. Car companies are gouging consumers with ever-larger cars and I have yet to see adequate charging stations for apartments and higher density housing (the kind we need). EVs require many more metals and minerals than diesel cars, prompting a boom in mining that is destroying communities - including next door in Nevada (see Thacker Pass, a travesty) and around the world. Mining is carbon and water intensive, making EVs essentially unsustainable and unfair. Public transit is the only truly just, equitable and livable transportation plan available. As a teacher I see how today's young people travel to Europe, Korea or Japan and see the potential for public transit here; I can only hope they will have a

voice on these matters (as opposed to the wealthy elderly who continue to clamor for cars to return to State St).

Regarding parking (T-5.6; Goal 8 in Circulation Plan), Santa Barbara is the easiest place to park I have ever known (I've lived in 8 cities and visited dozens more). Parking is not a constraint when I go to shop, eat, drink or watch a show on State St., nor has it been at any time in the 10 years I've lived here. I was frankly surprised to read Chapter 8 of the Circulation Plan. That has never been my experience.

Equity requires that "the employee shuffle" not be regulated away but addressed humanely - these are among the hardest working, for hourly/low wages people in our community. Consumers are the elite here, far wealthier than the struggling staff and small business owners working in shops up and down State St. Serious efforts to understand their needs and how viable alternatives to driving are for them are needed - I can only assume many of them commute long distances to get to work.

Thank you for the opportunity to review the Together to Zero plan. I feel very fortunate to be a long-term member of a community that is committed to providing a better future through appropriate climate planning.

I have the following comments related to the plan measures:

- 1. In terms of energy use/building energy, I would like to see more emphasis on energy efficiency in the built environment. I understand that new green buildings are more efficient, but much can be done to reduce energy waste in our current facilities, operations, and in the community-at-large. Converting from natural gas to electric can reduce GHG emissions since electricity is generally more renewable, but ensuring that things are designed, built, and used with energy efficiency in mind will be a very important part of this change.
- 2. In terms of transportation measures, the CAP references the Bike and Ped Master Plans. Plans are great, but they need to be implemented and updated as appropriate. In the current State Street Master Plan process, there have been many stakeholders who have tried to move State Street away from its role as a bike transportation corridor. They may not realize that bike travel on other streets feels/is unsafe, and that State Street functions as a critical piece of safe biking in the city. We need to make it easier and safer to travel on bikes and e-bikes in our city. E-bikes have already proven to be a great transportation option, and many residents use them more than, or in place of, a car. I support a very robust implementation of bike and pedestrian infrastructure, and ways to slow cars down and make the downtown more friendly and safe to bikes and peds.

3. As the CAP is implemented, staff should make sure that decisions made by city council and
implemented by staff are consistent and compatible with the plan. For example, is bringing more
tourists into the City via large cruise ships a climate benefit? Does it support any of the CAP measures, o
does it actually work against the many goals that the CAP aspires to acheive? It would be helpful if
consistency with the CAP was addressed in staff reports for projects/programs that go to City Council for
decision.

Thank you for your consideration and for generating an aspirational plan that our community can be proud of.

Molly Pearson			

Hi CAP people!

I appreciate the hard work the city spent on the Together to Zero program.

Some recommendations for your consideration:

# 1. Cost Data:

I find the current presentation of costs of limited value. I have prepared countless studies of the effectiveness of various air pollution control strategies. The study should present the costs of the various strategies in terms of:

- Cost to the city per ton on CO2e reduced.
- Cost to the private sector per ton of CO2e reduced.

The data should be presented as numeric value with a reference to where one can find documentation showing how the values were derived. Such a tabular display of the cost information would be much more useful.

## 2. Selection of Strategies

It looks like some of the strategies made it into the main document and others did not. What was the quantitative basis for that decision?

# 3. Comments on Specific Strategies

a. Measures T-8.2 (educate construction companies et al to use zero emission off-road equipment) and T.8.3 (identify off-road fleets with highest decarbonization potential). It looks like these two did not make the final cut. I assume the City is aware of California Air Resources Board's Off-Road regulation. Fairly recent amendments require owners of diesel-powered off-road equipment purchase only renewable diesel in areas that fail to meet federal air quality standards. Santa Barbara is not one such area, however, because most of the population of the state resides in nonattainment areas, it is probable that the only diesel fuel available in the county would be renewable diesel.

Renewable diesel is by definition carbon neutral. Right now, 30-40% of grid power in CA comes from burning natural gas. Hence "zero emission vehicles" is really a misnomer and will be for years to come. The city should therefore focus on renewable diesel as a strategy for reducing CO2e from diesel powered off-road equipment. This should also extend to on-road diesel powered vehicles as well. This should be a highly cost-effective strategy.

b. Measure B.E-1.4 (Convert streetlights in high voltage 6.6 amp circuits to LEDs). This one did not even earn a reference in the draft plan. The city has said the cost to replace the remaining ~20 areas of the city that have the ancient 6.6 amp streetlight circuits to ones that could support LEDs is very costly and can only be done spread out over time. The list of measures says 2035. The city should evaluate simply turning these circuits off until they can be replaced with LEDs. There are areas of the city with no street lights, which means that this is definitely do-able. I estimate this would save the city ~\$50,000 per year, not mention the costs associated with keeping these antiquated systems operating. I have the reduction in electricity consumption at 100 to 200,000 kW-hrs per year. This savings would allow the city to expedite the replacement of these circuits with ones that would support LEDs. And it is possible some areas may enjoy dark skies want to remain without streetlights.

I also recommend the city evaluate the cost/benefits of replacing the high voltages street lights with solar powered street lights, which would likely be cheaper than replacing the electrical infrastructure to support LEDs.

Finally, the city should evaluate the use of "smart street" lights that only operate at full illumination when people are detected. I have found it odd why a street light right outside my house operates at full

illumination when 95% of time no one is around. I ran this by staff and staff basically said the reduction in kW-hrs does not warrant consideration at this time compared to other strategies. I still believe that smart street lights deserves at least a mention because these are hard, quantifiable reductions whereas many other strategies are speculative at best.

Thank you for considering my recommendations. Questions are welcomed.

Regards

Larry Rennacker

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Hello,

This is a contribution to the discussion on the Santa Barbara 2024 Climate Action Plan In reviewing the documents online it is stated that the greatest contributor of greenhouse gases to the atmosphere comes from the transportation sector. That is certainly not new news. The documents tweak around the edges of the central problem with small, but not unimportant measures.

Single occupancy vehicles on Highway 101 is the central problem. There is nothing in the documents that I can see about a bold, and obvious solution: some form of true commuter rail between Ventura and Santa Maria. \$700 million has just been spent on accommodating more automobiles on Hwy. 101, at the same time that government officials are touting needed climate change measures--including the Climate Action Plan documents, but not that one. We cannot have it both ways.

That \$700 million may buy us five years befoe the freeway is again clogged due to additional cars from additional housing and hence additional drivers, all the while being a living river of greenhouse gases. People idle in their cars on the freeway while right next to it is a little used rail line.

I await the day that government officials, from Salud Carbajal to Monique Limon to the County Supervisors and the Santa Barbara City Council and the mayors of all the incorporated cities on the Central Coast actually face what is right in front of them and get bold and courageous and DECIDE with conviction that the current Highway 101 situation is untenable and actually come together and float a bond measure for true commuter rail, and meanwhile stop blaming the Union Pacific. That has been a long term copout. Other localities have had the spine to do it. How bad does it have to get before

someone steps up? The Climate Action Plan documents regarding transportation are nice but don't even begin to get into the meat of the issue.

Sincerely, Benjamin Sawyer

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# Hello,

I am very appreciative of the work that you are doing. I follow climate issues closely, and I am glad to read about the good work you're doing and plan to do in the future. I recognize that you have had limited staff and a limited budget – there's nothing personal in my criticisms. I hope that we are able to find more resources in order to move ahead quickly on these issues.

There are lots of comments below. Most of them are fairly minor critiques of prioritization and questions about implementation.

- Some of them come from personal frustration with our current situation there seem to be far fewer available rebates than one would think, and the ones that are sort of available through 3C-Ren have been very problematic, at least for me.
- Some of them are positive suggestions. I think there are much better ways to go about expanding battery storage that is available to the grid. I agree that battery storage is tremendously important, but I have strong opinions about the way to do it.

## Building energy:

I am basically supportive but disappointed that more reductions are not anticipated in our natural gas use. I view BE 7.3 (targeted rates & programs) and BE 5.17 (pilot programs) as potentially being far more impactful than the one-leaf rating. More on this later.

BE 6.12 is crucially important (and difficult – I get that), and I love BE 6.11 – HW loaner program to give people time to do required upgrades for a HPHW system. How can you not put stars next to these (2 year timeline)? Please prioritize these.

I worry about 6.1 through 6.4. They seem to be saying different things about the approach. Will building owners have to meet performance targets, or will they have to eliminate gas connections, or both? I fear that we'll be dealing with muddled messages — we all do better with a good balance between clear requirements and choice in specific actions to meet goals.

The "Priority Strategy: BE 1.1" page is confusing. It seems to be about municipal buildings, then in the "What Can You Do" section, it tells us to swap out our HW heaters and electrify our homes. In fact, the "What Can You Do" section in many of these pages seems to be filled with unrelated items. It's not that important in the big picture, but please stay focused and help us stay focused. If there's a way we citizens can help with the item on the page, ask for it, but otherwise leave this section blank.

"Priority Strategy: BE 5.5". This pilot program is very important, but one of the key points seems to be developing a funding strategy to pay for upgrades now that might result in savings over a longer term. I see that this issue is discussed in detail in one of the backup documents, but the information is background data, not plans. I believe that it's important to move fast on establishing pilot programs — it will be too many years to wait for pilot programs that need years just to get to the start.

In general, I believe that we need to move aggressively to install larger electrical panels in more homes and apartments, then install heat pumps, heat pump water heaters, heat pump dryers, bidirectional EV chargers, etc. I realize that funding these may be outside the ability of the city to do much about it, but I am upset that you seem to be taking a relatively passive role. I suppose it's good that you're focusing on what you have reasonable confidence in achieving, but without much stronger action in this area, we end up being very far from net zero emissions by 2035. We could do much more and need to try harder.

You only make a passing mention encouraging homeowners to install batteries, which I am fine with. It makes sense to distribute PV generation wherever there is room to do it economically, especially if we can avoid using open space. Batteries do not take up as much room and entail more danger than PV. For the most part, let's keep batteries a little more concentrated near substations, generation sites, and particularly large consumption sites. It does not make sense to install small batteries on residences around the city.

Regarding the Transportation Emissions section, you are missing some very important elements for how to renewably meet the demand from adding transportation to the electrical grid and how to use car batteries to help with resilience.

T6.1: Charging cars will add a huge load to the grid that presents both a threat and an opportunity to our climate goals, given that most of our renewable power for the foreseeable future will be PV. If most of

us have chargers at our homes, the natural thing would be to charge our cars at night, when there is much less renewable power available. There are a couple of obvious solutions:

- Build huge banks of batteries to store PV power at night, and use the batteries to charge the car batteries.
- Encourage the installation of chargers wherever cars will be parked during the day, so that PV power can be used directly.

The first solution requires that we build a much higher volume of batteries than we really need for much of the transportation sector, while the second requires that we encourage the installation of chargers where cars will be located in daylight hours instead of other places. Let's go for the second solution — all that is required is some combination of foresight in setting rates and incentives for electricity and charger installation.

In addition, many people don't seem to understand that the power circuitry used in EV inverters used for level 1 and 2 charging is, in most cases, bidirectional except for the details of the control functions. SB 233 would require car manufacturers to adopt standards for providing the bidirectional function for cars; the discharge/charge function would be controlled by the power companies with permission and limits established by the car owners. Cars can then take over much of the function now given over to home and even grid-level battery banks. Of course most of us would not want to let the power company run our car batteries down to low levels overnight, but that's not necessary. Car batteries typically have 60-80 kwhr capacities, while home batteries might be 10-20 kwhr. Letting a car battery go from 80% to 65% overnight has very little effect on battery aging and would not affect the typical commuter who has access to daytime chargers. The parameters acceptable to a power customer/car owner could easily be set in a cell phone app.

The economic benefit of this would be huge, but I don't perceive that most organizations are taking it seriously. Power companies don't have economic incentives to make this happen, but the rest of us do, even those of us who don't drive enough to be directly involved. Please figure out how to include it in your plans.

Note that we do have something of a timing problem: Bidirectional chargers that can be controlled by a combination of electric companies and owners don't actually exist yet, at least not in the wild, because there are not agreed-upon standards. But they will exist, and we need to insist that they exist as quickly as possible. Larger charger customers should be able to order chargers that are upgradable – there's a good chance that the upgrade could be software only. There is a bit of time for us on the charger side given that cars with bidirectional capability are not yet common (Ford F150 and Kia EV6 are examples of ones that have it.).

(end of EV charging rant)

T8.1: I support your efforts to encourage people to bike and walk – I am on the Transportation and Circulation Committee and am well aware of the great efforts by the PW Department and also the challenges of getting us out of our cars. I expect electric bikes and perhaps other electrically-powered vehicles that are less than cars to play an increasing role; encouraging their use while keeping people safe and secure will be a challenge.

Your pie chart for waste, water, and wastewater emissions can't be right. A 2020 Independent article reports that our desalination plant uses 13.8 million kilowatt hours (kWh) of electricity per year. The Public Works Department has installed large Tesla batteries at the Cater water treatment plant to accommodate this large draw in as sustainable way as possible. I guess you can claim that the desal plant uses 100% carbon free power already, but we all know that in some sense, power consumption is power consumption. Please let's try to keep the discussion consistent and rational.

For W4.12, I am totally supportive, but please supplement it with policies that prevent what happened with the state trash bag law, where the lightweight bags were replaced by the heavier HDPE bags that are also rarely recycled. Plastic produce bags are very lightweight—let's make sure that the replacement is actually better. I would like to see people use natural cloth bags instead, but they need to be available, durable, and able to take aggressive washing. Using reusable synthetic fiber bags that shed microplastics and end up getting tossed quickly because they stain badly might not help. Similar issues arise with the other things on the list, like straws.

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Thanks.

Peter Smith

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#### Zero Emission Vehicles

"Green Transportation," in the present context, most likely means the replacement of internal-combustion engines by bringing back electric vehicles (EVs). To say that an EV is a zero-emission vehicle is not at all valid. All an EV does is to move the emissions from the tailpipe to the power plant. Also, if

forty percent of the electricity generated in the U.S. is from coal-fired plants, it follows that forty percent of the EVs on the road are coal-powered.

# **Energy Losses with Electric Vehicles**

Running a gasoline car involves burning gas in the internal combustion engine and converting thermal energy to mechanical energy. That's it. Charging an electric car's battery from the grid and driving the car involves burning fossil fuels at the power station and converting thermal energy to mechanical energy. This is only moderately more efficient in a power station than gasoline cars. Then, losses begin. Converting the mechanical energy of the turbine into electrical energy in the generator involves generator losses. Converting medium voltage from the generator into high transmission voltage involves transformer losses. Transmitting the power along the high voltage lines involves transmission losses. Stepping down the voltage in several substations involves transformer losses again. In a home charging station, converting 220-volt AC power into DC for car charging again involves conversion losses. A chemical process in the battery that is being charged heats the battery, involving charging losses. Running the car's electrical motors from the battery requires inverter losses to generate electricity for traction motors and motor losses. When a driver needs heat in the cab, heating a gasoline car in winter involves redirecting waste heat (hot antifreeze) from the engine into the cabin heater, thus not requiring additional fuel. Heating an electric car requires a resistance heater or a heat pump, needing to consume more energy from the grid, eventually, with all the above conversion losses included. Overall, an electric vehicle is a less efficient way to turn a quantity of fossil fuel into rotation at the wheels and is causing even more pollution.

#### **Batteries for Electric Vehicles**

A topic deserving its own discussion is that of batteries. A typical EV battery weighs one thousand pounds. It contains 25 pounds of lithium, 60 pounds of nickel, 44 pounds of manganese, 30 pounds cobalt, 200 pounds of copper, and 400 pounds of aluminum, steel, and plastic. Inside are over 6,000 individual lithium-ion cells. All these toxic components come from mining. For instance, to manufacture each EV auto battery, you must process 25,000 pounds of brine for the lithium, 30,000 pounds of ore for the cobalt, 5,000 pounds of ore for the nickel, and 25,000 pounds of ore for copper. All told, you dig up 500,000 pounds of the earth's crust for just one battery. 68 percent of the world's cobalt, a significant part of a battery, comes from the Congo. Their mines have no pollution controls, and they employ children who die from handling this toxic material. Should we factor in these diseased kids as part of the cost of driving an electric car?

#### Electric Vehicle Wear and Tear

An interesting problem that I once read about is that, according to tire shops, electric cars are going through tires faster than gas powered vehicles of the same size and over the same driving distances. It turns out that the constant torque generated by the electric motor drives against the tread all the time, compared with the power fluctuations associated with driving a gas vehicle. The tire stores are seeing tires ordinarily rated for 60,000-miles wearing out in only 30,000 miles.

#### California's Electric Vehicle Mandate

Returning to the situation in California, the state has a mandate to bring back the electric car that really amounts to a ban on poor people buying cars. The cheapest electric car costs about \$30,000, not

counting the cost of battery failures. The average cost is about \$54,000. The state's average income is about \$34,000. Most of California's population cannot afford electric cars, even with the subsidies included. The raw material costs for an average electric car are about \$8,000, compared with \$3,600 for a gasoline-powered car. Car ownership offers mobility and independence. What this mandate really does is to force the working class and middle class to leave the state. California's electric grid cannot be supported if the entire state's population is using electric cars, especially with the state's power coming from unreliable and inefficient wind turbines and solar panels. Finally, California has a big problem with wildfires. With an electric car, evacuation from the fire zone may be impossible during a power failure. This could be a death sentence.

Electric appliances are a waste of energy. First, you must generate electricity at the power plant by burning fossil fuels. Any process that converts combustion heat into mechanical work is typically only about 30 percent efficient. The rest of the energy is rejected as heat. The electricity is then converted back into heat in the buildings. Instead, just bring natural gas directly into the building through pipes and convert it into heat by burning it in stoves, water heaters, and dryers. This has worked just fine for most of us for many years, and natural gas burns very cleanly.

Bob Bugiada
333 First Street, Apt K-211
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To see my LinkedIn profile, Ctrl-click Here Solar Activity

The greatest influence on climate has always been, and will always continue to be, the sun. Sunspots have a significant effect. There are several telescopes atop Mt. Wilson, near Los Angeles, dedicated to the study of sunspots. For overly simplified examples, just notice how much warmer it is during the day than it is at night, and how warmer it is during the summer than it is during the winter.

# Water Vapor

Humidity also has a significant impact on temperature. Water vapor is the predominant greenhouse gas, which absorbs and re-emits energy into the atmosphere. The molecule's thermal and optical properties also make it so. It can have concentration as high as 25,000 parts per million (ppm), which is two and a half percent. During the summers in dry cities, like Los Angeles, temperatures drop significantly at night. In humid cities, like New York, the temperature is often high and uncomfortable all night. Also, cloudy nights are usually warmer than clear nights.

#### Carbon Dioxide

Carbon dioxide, on the other hand, is a trace gas. It is currently only about 400 ppm, or 0.04 percent, of the atmospheric mixture. It is not a pollutant. It is produced when animals exhale and by chemical

reactions such as combustion of fossil fuels. Green plants use it in photosynthesis to make oxygen for us to breathe. It is essential to all life on Earth. The optimal carbon dioxide level in a commercial greenhouse is 1,100 to 1,500 ppm. There is a strong correlation between the concentration of carbon dioxide in the atmosphere and the degree of forestation, but the correlation between carbon dioxide and temperatures is very weak. If anything, historical temperatures LEAD carbon dioxide concentrations. There is an equilibrium, known as Henry's Law, between the carbon dioxide concentration in the atmosphere and the carbon dioxide dissolved in ocean water. Warmer water drives carbon dioxide from the ocean into the atmosphere. Sources of heat are the tremendous number of undersea volcanoes. It is estimated that a 1-degree Celsius temperature rise in the ocean increases the atmospheric carbon dioxide concentration by about seven percent. Historically, carbon dioxide levels and temperature fluctuations occurred when human beings did not even exist on the planet. The concentration of carbon dioxide has exceeded 1,000 ppm many times. Why weren't the "tipping points" that they constantly warn us about ever triggered? The amount of carbon dioxide produced from human a ctivities is easy to calculate, easy to measure, and therefore easy to tax. There is no peer-reviewed study that proves that carbon dioxide controls climate, or even that Man is the cause.

## Carbon Dioxide versus Water Vapor

The estimate of the percentage of atmospheric carbon dioxide that is caused by human activity is 0.03. Multiplying that by 0.04 percent gives 0.0012 percent. Compare that with the 2.5 percent of the atmosphere that is water vapor. The ratio of the percentages of water vapor to carbon dioxide is greater than 2,000. It's hard to believe that a small percentage change in carbon dioxide is affecting the climate much. Sadly, the various climate accords and protocols completely discount the effect of water vapor. Maybe it's because water vapor is nearly impossible to control.

#### Other Greenhouse Gases

Methane is even lower in concentration in the atmosphere at about 1.7 ppm. It isn't even worthy of consideration, and discussions of the digestive characteristics of cows are laughable. Nitrous oxide is lower still at about 314 parts per BILLION. Efforts to curb the use of nitrogen fertilizers are dangerous and can lead to food shortages and mass starvation. Even lower is the concentration of chlorofluorocarbons at about one part per billion, yet we all must buy more expensive and exotic refrigerants each time we recharge our car's air conditioners.

# Combustion of Fossil Fuels

If burning fossil fuels is the culprit that many say it is, then there would be a commensurate reduction of oxygen, which is necessary for combustion, in the air. That has not happened. Often overlooked is the effect of large volcanic eruptions, which can cause tremendous climate disruptions worldwide. The sulfur dioxide and other aerosols flung into the upper atmosphere cool the planet by blocking out the sun, as shown by ice-core samples and tree rings.

## Arctic Ice

Retreating glaciers are often pointed to as "proof" of human-induced global warming by those predicting climate catastrophe. Though the planet IS warming, and glaciers ARE retreating, the beneficial warmth began more than 300 years ago. That was long before emissions of carbon dioxide could have caused any temperature increases. Although our current warming trend began in the late 1600s, the

glacial retreat wasn't started until the early 1800s. That is because it took 100-plus years for the warming to cause more summer melting than winter accumulation. A highlight of many Alaskan cruises, Glacier Bay is often pointed to as a warning of our "sins of emission." However, retreat of this glacier began in the late 1700s and had retreated some 50 miles before significant additions of carbon dioxide in the mid-20th century. There have been only about ten miles of retreat since. Glacial facts simply do not support the theory that carbon dioxide is the primary cause of modern warming.

#### **Historical Trends**

One thing constant about temperature is that it is never constant. The planet has altered between very cold periods (glacials) and warm periods (interglacials). The glacial-interglacial cycles are controlled by changes in the Earth's tilt and the shape of its orbit. The earth was warmer in the past. The Vikings, during the Medieval Warm Period, would never have been able to reach North America today with their flimsy wooden boats, as they did a thousand years ago. The Romans, during the Roman Climate Optimum, grew wine grapes in England. Receding glaciers have revealed underlying ancient forests. We are now emerging from the Little Ice Age, which lasted for about five hundred years and only ended in about 1850. Remember that painting of George Washington crossing the Delaware River with chunks of ice floating in the water? That horrifically cold period is known as the Maunder Minimum.

#### **Scare Tactics**

All the climate scaremongering over the past several decades has amounted to nothing more than false predictions. There are no trends showing recent upticks in tropical cyclones, droughts, river floods, or tornadoes. Sea levels have barely risen an inch a decade since 1880. Artic sea ice may be down, but Antarctic ice is up. The polar bear population is up.

#### Energy Policies of the U.S. and Other Nations

While the US and the West are proceeding down a path of less energy and more dependence, other nations, like China and India, are building hundreds of coal-fired power plants and embracing energy independence.

#### Carbon Capture and Storage

The best ways to "capture," or sequester, carbon is to make things out of it, as with timber plantations and growing food crops. Even more absurd is the "storage" part. Store it for what? Even worse is "decarbonization," since carbon compounds are the life blood of the economy.

### Warming versus Cooling

Let's not overlook that cold weather causes more deaths than warm weather. Warmer times are better for plants, animals, and people. Warming makes possible an abundance of food and frees the population from its preoccupation with daily survival to do other things, thus leading to cultural development. Bad things happen during cold periods, bringing severe hardship and death.

#### Consensus

The "science" is NOT settled. Consensus is not science, especially when the consensus is within a very insular group of mostly academics, self-proclaimed environmentalists, and government types.

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The City of SB's Climate Action Plan is commendable in scale and ambition but will be difficult, if not impossible, to meet if the City and its leadership is unprepared to demonstrate real political courage on certain fundamental issues.

I continue to be disillusioned and disheartened by the City's approach to addressing the biggest share of our GHG emissions, transportation.

For too long we have prioritized an archaic model of mobility, one which focuses primarily on the use of private automobiles (electric or otherwise). Not to discount the countless hours and resources that have gone into the development of the "Bicycle Master Plan," but the results, even if fully realized, will be nothing more than tweaks around the edges. A system that does not encourage and enable trips by bicycle for eight and eighty year olds alike will only result in the bravest of citizens electing to ride instead of drive, thereby leaving a 42% reduction in transportation GHG reductions out of reach.

Even if we move the entire fleet of cars in SB to electric, we will not achieve the dual goal of "Promote use of safe, equitable, zero emission transportation options to reduce pollution and urban congestion today and for future generations."

The Bicycle Master Plan is a fine representation of incrementalism, but the City's CAP is too bold, too ambitious, too time sensitive to allow for an incrementalist approach. The reliance on "bike lanes" represented by a painted line on the ground will not get people out of their cars and onto a bike, because paint is not infrastructure!

Only a fully integrated network of protected bicycle infrastructure connected throughout the City's core and to its periphery will achieve real transformation. You can look for examples to almost any city in the Netherlands, e.g. Amsterdam, Utrecht, Haarlem, etc., Copenhagen, and even cities like Paris and Barcelona for those making the necessary changes to prioritize cycling over driving. Changes which require serious political courage to enact decisions like removing parking spaces and spending the

necessary resources to build protected infrastructure. And to those that say "but we're not the Netherlands or Copenhagen," my response is "YOU'RE 100% CORRECT." Santa Barbara is far better positioned to achieve ridership levels that exceed places located in the very northernmost latitudes of Europe. If there are two things I ask you take away from this rant it is this: Paint is not infrastructure Design a system for eight and eighty years olds alike These are the two maxim's to live by when considering bicycle infrastructure, with maybe the third being "if you build it, they will come." Cars, whether they are electric or fossil fuel powered, are no good to anyone when streets are flooded, roads washed away, drought has parched the earth and hills are ablaze. The time for tough decisions is now before it is too late. I haven't even mentioned the social justice and equity implications of a transportation system designed around people rather than cars, nor the community health benefits. I'll save that for another day. Happy to discuss further anytime. Blake Stok Director of Sustainability, Thai Union North America 240.543.0994 \*all views represented are my own.

Dear City of Santa Barbara,

I'm re-submitting this letter as a final version as there was a typo in my previous email. Pardon the oversight (multitasking!).

\* \* \*

Thank you for the incredible commitment to progress on climate and for the open invitation for suggestions and feedback.

Our nonprofit, Zero Foodprint, leads collaborations with the state and regional governments like Sonoma County to scale agricultural climate solutions (letters attached).

While the City of Santa Barbara contains a very modest amount of working lands within city limits, it has an outsized potential to set a world changing precedent on working lands sequestration. As written, the current CAP radically forsakes responsibility for food consumption. SB represents ~20% of Santa Barbara County's population, despite containing almost 0% of county farmland. A proper accounting would include taking responsibility for the potential sequestration on 20% of Santa Barbara's working lands, or about 140,000 acres.

Or, if considering scope 3 emissions from the consumption of food, and nationwide proportionality (~2.7 acres of agriculture per US resident--894.3m acres for 331.9m citizens), Santa Barbara's 87,533 residents could assume responsibility for 236,000 acres of agricultural production.

But this comment is not about moral responsibility or carbon accounting. It's about community solutions-potential.

Because of the presence of an amazing regenerative agriculture and carbon sequestration community (White Buffalo Land Trust, The Greater Santa Barbare Resource Conservation District, UCSB/Bren School of Environment, etc. there are already local leaders and clear guidance. Attached is a report from UCSB outlining the potential for Santa Barbara County lands to sequestr 200,000 metric tons of CO2e.

A simple, very nominal and completely optional (opt-out) 1% fee at restaurants could finance transformative, place-based climate solutions with myriad co-benefits, while also making customers feel great about their purchases. Moreover, the sequestration funded by that ~\$5,800,000 per year from a 1% restaurant fee would count towards Santa Barbara's targets as part of regional insetting and could be reflected in CA's SB27. And the funds generated can also meet Santa Barbara's SB1383 requirements to procure ~4300 tons (city) or 20,000 tons (cities + county) of compost, per year (an otherwise unfunded mandate).

Such a fee could meet the SB1383 requirement entirely and utilize every ton of compost on working lands sequestration projects by covering the last mile (freight and spreading). CARB and CDFA endorsed organizations like mine, Zero Foodprint, are standing by to operationalize both the optional funds collection and compost procurement and application at no cost (administrative fees could be paid from within the proceeds).

For the purpose of the plan, I suggest adding an item:

"conduct a feasibility study around a regional carbon sequestration program funded by optional fees in food, beverage and tourism."

In case it's useful, I also have ordinances already drafted through a collaboration with the Natural Resources Defense Council.

We are already leading (nascent) collaborations with Boulder County and hold contracts with 17 jurisdictions to manage portinos of their SB1383 procurement.

We'd love to present our work and assist the region with transformative change to improve resilience, water conservation and prosperity. We are also part of this \$5M CDFA grant and would love to bring some of the resources to your region to kick off a collaboration.

All the best,			
Anthony			

Hello,

My name is Patrick Wayand, I'm a cybersecurity professional, outdoor enthusiast, environmental advocate, volunteer, and SB community member.

From what I can tell city leadership has made extremely important decisions about our future and I am so happy about this. I'd like to aid in these efforts with my comments below.

Carbon neutrality can come in 3 ways. Reduction, retainment, and removal.. the 3 R's.

I love the temperate climate that SB has to offer, this lends so well to using bikes as a main method of transportation. Riding bikes can fall under the first R and I ride my bike everywhere I can and would love to see an improvement in the bike lanes and infrastructure that make getting around easy. This means timing traffic lights in a way that is more friendly to bikers, making biking safer for cyclists and creating even more projects to increase bikeability. Recent projects have left bikeability about the same as before, it's still difficult to navigate and still dangerous. I urge SB to invest more heavily in this aspect of Reduction, especially given that 40%+ of emissions come from single occupancy vehicles. My insight here is that, instead of diminishing returns, increasing bikeability projects will have exponential returns as more citizens turn towards biking as a primary mode of transportation given advantageous infrastructure is put in place.

A close second to bikeability is in the enforcement of the ban on gas leaf blowers. I have lived in 4 different neighborhoods in SB now and have noticed that there is 0 enforcement on this law. https://www.ourair.org/leaf-blowers/

SB is doing an amazing job with the second R, retainment, if you've ever been up on the riviera overlooking Santa Barbara, or enjoying a picnic at Franscheshi park, then you know that SB is mostly green! Please keep doing what you're doing here. For the third R, removal, or sequestration, it looks like there are numerous avenues to explore, but I want to highlight the issue on point CS-2.7. This point is in regard to using kelp forests for carbon sequestration.

I would like to make it known that the Fish Reef Project, who I volunteer for, has already conducted research on the subject and has a solution for kelp reforestation. Please consider adding this Local 501(c)(3) as an important part of the SB CAP. Large amounts of carbon can be sequestered through our access to an amazing coastline.

One last add-on to the above, I absolutely love grabbing my produce from the Santa Barbara Farmers Market. It is well known that soil health plays a big role in carbon sequestration. Please consider partnering with local farms to educate on and initiate sustainable and renewable farming practices that lead to strong populations of bacteria and fungi in the soil. These types of farming practices can allow the soil to sequester even more carbon than the trees!

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Patrick

Hello,

We trust that the city and county will access and support the Sea Cave True Blue Carbon Bank operated by local NGO Fish Reef Project. Their Sea Cave reefs already have verified existing carbon sequestration science, carbon project validation, registrations and a fully functional crediting system on the international carbon registry. The Sea Cave True Blue Carbon Bank will allow for expansion of the Goleta Kelp Reef while helping the city and county meet its blue carbon needs. Blue Carbon needs are the portion of a regular carbon footprint that in any way touches or impacts the ocean or aquatic systems including: dredge, offshore energy, pipelines, sewage, vessel operations from law enforcement, pile driving, coastal run-off from development, non source point pollution, allowing cruise ships to anchor etc. Typically 15-20 of all carbon budgets should be offset with blue carbon when available

Best regards,

Chris Goldblatt-CEO

written 100% by a human- NO AI used in this email

Hello,

I've lived in Santa Barbara for 28 years, plus seven in Noleta.

I have two main comments on the plan:

- 1. This is a jargon-filled document. It's perhaps fine for staff use, but it is hard for the average person to understand. This creates more separation between the government and the citizens. Please produce a readable (and much shorter) companion document for public consumption!
- 2. The writers have clearly bought into certain energy-related concepts that have arisen mostly in the last several years, and this seems to be the driving force behind most of this document. Sustainability needs to include more social-centered themes; this document focuses mainly on "energy" issues, instead of building community in more human ways, including food production.

I will add that I do not agree with the need to "take drastic actions for the climate." There are many contradictory scientific studies that oppose the big "save the planet" push. Yes, I am a trained scientist myself and I can see there is a strong special-interest-heavy push that will only make the rich richer and not actually help the rest of us or the planet. Please reconsider relying on the UN's opinion regarding the climate!

Please let me know that you have received this input.

Sincerely, Rich

Rich Moser

rich@transcendentalastrology.com

(805) 845-4805

Please make all buses electric. In addition please plant all medians with low water ground over rather than having workers with large gas trucks and equipment come every month with to weed.

Thank you. Leila Thomas 2304 state street Sent from my iPhone. Please pardon any typos.

leila thomas 303.717.0254

This CO2 Global Warming governmental campaign, both local & national, is based on contrived, faulty scientific data, manipulated by certain governmental entities to achieve political goals that have nothing to do with science.

Lynn D. Brown, P.E. Orange County, CA

Congratulations on your new City Department! It looks like it's thoughtfully organized.

I don't see anywhere on your site about addressing gas powered gardening equipment. Is it somewhere I don't see?

I'm aware of the ordinance requiring electric leaf blowers in residential areas, although there are more gas blowers everywhere than ever. Electric blowers are a rarity anymore. Any plan for promoting electric blowers and all other equipment for that matter.

Is there a pamphlet explaining the ordinance and the benefits of electric equipment that I can pick up and hand out to the gardeners around my neighborhood? They don't seem to care at all and since there is no enforcement, what's the point?

Any thoughts about promoting this ordinance, perhaps with water billing letter/e-mails?, anything? If you don't have a pamphlet at this time any plans to make one? Perhaps by Earth Day so you can have them available at your booth.

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Gina

Section 4 Building Energy Measures: I don't see anything in the plan about measures to reduce building energy use. Reducing building energy use should be a first step, because then less electrification is needed. Electrifying a building that is wasting energy, even if it's electrical, is somewhat counterproductive. Retrocommissioning is a proven and cost-effective method to reduce building energy use in existing buildings by identifying and correcting issues that are causing unnecessary energy use. This is especially true for more complex buildings and/or buildings that have a building automation system. I recommend evaluating all existing buildings and implementing retrocommissioning at least in the largest buildings, complex buildings and buildings equipped with a building automation system.

I support closure of the Diablo Canyon nuclear plant as soon as possible.

Twenty years is much too long to keep it running.

The plant is known to sit on a fault line and is a target in a potential enemy or terrorist attack.

Not to mention the dangerous byproducts produced by its operation.

Marina Lenney

global warming.

In affiliation with the Nuclear Age Peace Foundation, Santa Barbara

Forgive me for not jumping on the bandwagon with the rest of you, but there is no way that anything we do in Santa Barbara will make the slightest difference in the coming ice age, the climate catastrophe, or

The world has gone MAD over theories and computer predictions and "adjusted" data. The politicians have found a new way to control us and spend a lot of money with no results. Al gore predicted an ice-free arctic by 10 years ago – didn't happen. Polar bears should be extinct by now – but there are actually more.

You guys worry about sea level rise. The ocean has been rising at 2mm (1 inch every 12 years) for thousands of years. We normally survive high tides of over 80 inches. Why worry?

Your high-paid rule writers with their big words talk of "equity", but are singling out some neighborhoods over others. Is that equity?

You want everything to be powered with electricity, but the current grid will not handle that especially with the additional power that we're going to have to generate to cover the demand. You want to only use "clean" electricity. The price of electricity is set akin to a pit in the stock market, hourly and every 5 minutes. If more cities want only "clean" the price will go up.

Look at Germany. They are very serious about climate change. They are shutting down industries. Their electric price is going up, and they are even considering banning driving on weekends. They switched from burning coal and natural gas to burning wood from American forests because it is "renewable".

Look at England – outlawing coal and gas heaters and requiring heat pumps. It is not going well.

Let's forget this garbage, reassign the rule writers to somewhere they can do some good, and let us get on with our lives.

Fred Sanford

Santa Barbara

#### Hello

I think that stopping container ships from coming into the channel would be a very good start. They pollute and kill whales. They should not be allowed in this sensitive Marine environment.

The same with the cruise ships. The money gained from this is not worth the damage these ships cause, especially from effluents, trash and other vehicles sightseeing tours.

Please stop these ships immediately.

Stop using round up spraying the environment in city or county areas. Promote the planting of more native plants such as milkweed for monarchs. As well as planting trees which are citrus or other edible fruit trees (including loquat and native elderberries) instead of these strange ugly trees being planted on our city streets. Stop the use of glue traps. Stop building things that block our Mountain and ocean Views.

We used to have a lot of apartments and houses here in sb but now they are all being turned into rental housing and more hotels are being built. Nothing three stories high should be built. The multi use buildings use too many Hvacs and not enough solar they are loud and destroy the night peace.

Who are these new city planners? Where so they come from and why are things being done like the sola street closures and chopping down perfectly good trees happening without anyone knowing?

There is too much traffic in sb, and visitors should need to leave their vehicles in a special lot where they can then use electric vehicles or bikes to get where they need to go. The new lanes on the freeway have allowed so much constant traffic on the 101 that the noise is disruptive to all areas of SB.

Train travel should be promoted instead of cruise ships and more automobile traffic.

Marborg needs to make less noise., their truck should convert to electric and their bins should be made from rubber. They cause too much noise to residents in the wee hours of every morning, This is S B not NYC.

Thank you

Gina Comin

I think that government should work on goals that make everyone's lives better. California has among the highest taxes in the nation. We also have among the highest home prices, highest homelessness, highest poverty and the most potholes.

I live in western Goleta where our main road, Cathedral Oaks, isn't even accessible anymore to get on the 101. It feels like a third-world country.

I want my tax dollars spent on IMPROVEMENTS! Not mythical "climate action."

I'm not a scientist but let me ask you this... you are pushing for "net zero emissions" ... what is the cost benefit analysis on that??? What about Santa Barbara's "climate" don't you like and how will you change "OUR climate" and at what cost? Are you hoping and wishing for our Santa Barbara climate to get hotter? colder? drier or wetter? Please provide details not generalizations like "climate alarmists predict ..." How will "climate action" change the climate in the jurisdiction in which you were elected and serve? Santa Barbara County. And in what manner should I expect "climate change" results? Are there studies showing less climate change somewhere based on the actions you are proposing? Where has this actually worked?

And do you believe forcing people to buy expensive electric cars or to ride dangerous bikes around in the next 10 years is going to improve Santa Barbara's "climate."? Will it affect Santa Barbara's climate in the LEAST?

I'm all for clean air and water. But changing the "climate" that is already among the world's best seems foolhardy and counterproductive.

Please fix the roads!

Sincerely,

Nicole Coulter

Goleta Taxpayer

Get Outlook for iOS

It is useless to spend time, energy, and money on a CAP. There is nothing that Santa Barbara City can do about climate change that will make any noticeable difference.

I oppose the CAP.

Jed A. Hendrickson, CM, FAICA

Santa Barbara Monumental Co. Inc.

3 N. Milpas St.

Santa Barbara, CA 93103

805-966-7373

Fax 805-564-8296

www.sbmonumental.com

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I understand that serious researchers have shown CO@ extraction from the air is inherently so expensive, inefficient and potentially damaging to underground aquifers, as to be impractical. Apparently it's been promoted by the fossil fuel industry to show they're "doing something". Don't let us fall for this con job and waste our money on it.

Thank you for your attention,

James Shelton

Santa Barbara

#### Dear Board members:

Good environmental policy comes from good science. No one argues for living in a polluted world, but the costs must be justified by the benefits. And CO2 is not the boogeyman that the media makes it out to be. It's plant food. At just over 400ppm it represents 0.04% of our air. This is close to the lowest level it's been in geologic history. If it drops below 150ppm all advanced plant life dies. The greatest greenhouse gas (90%) is water vapor. That's why it's cold at night in the desert because there's no water vapor to retain the heat in the air. CO2 represents 6% of greenhouse gases. Earth temperatures are driven by planetary and solar movement cycles.

Before you spend millions trying to reduce the levels of plant food in the air by some minuscule amount, consider the other good projects that money could be used for (For instance converting los Banõs pool to hydrogen peroxide instead of chlorine disinfectant).

Source: Gregory Wrightstone 'Inconvenient Facts'

Also, all major advances in human history have occurred during warm periods. It lengthens growing cycles and leads to more food production.

Keep warm,

To whom it may concern,

Dr. Hesu Whitten Founder, Whitten Method

I want to first thank you and your team for the hard work that's gone into drafting the CAP!

I work for a national nonprofit working to reduce food loss and waste, so while I'm providing comment as a resident of the City, this feedback is informed by my work in the space. I'm therefore focusing comments on the Water, Wastewater, and Solid Waste strategy.

W 4.5: I'd recommend increasing the frequency of the waste characterization studies, although I know they tend to be extremely expensive and time-consuming. Particularly in the California context where jurisdictions are rapidly instituting programs to comply with SB 1383, a cadence of 4-5 years will not capture change in a time frame that aligns with the hoped-for behavior change. Particularly for food waste, where embodied emissions are highly dependent on the type of food, accurate emissions projections will require characterization studies that capture both the percent of total waste that is food AND the percent of food in waste that falls into categories like meat/dairy vs. grains/produce.

W 4.1.a: We've been hearing that some restaurants and other foodservice organizations are installing what they call "digesters" but are really just machines that grind up food scraps into a slurry that are then transported to a landfill or discharged into the sewer. At high enough volume, this could present problems in terms of FOG buildup in sewer lines and oxygen demand at wastewater treatment plants - more pertinently, this pathway is not line with EPA's recently updated Wasted Food Scale, which puts sewer at the bottom along with landfill and incineration in terms of least preferred destinations for organic waste. I would encourage planners and regulators to ensure that the technology implemented to "reduce waste" truly does so by recovering value from organic materials.

General feedback on actions under the organic waste measure: I would reorder the activities to fall more in line with the Wasted Food Scale mentioned above, so that opportunities to reduce organic waste are prioritized according to a Prevention>Recovery>Recycling hierarchy. Indeed, while composting and anaerobic digestion are valuable approaches to recapturing the nutrient and carbon content of organic material, they are now considered "waste" destinations per EPA's food waste reduction goal. ReFED modeling indicates that over 90% of lifecycle emissions from food surplus are

accrued during supply chain stages before the point where the food becomes "waste" - highlighting the importance of preventing food from exiting the human supply chain in the first place. So as important as it is to provide support and investment in recycling infrastructure and programs, I encourage the City to consider actions they can take that would target waste generation upstream. The Zero Food Waste Coalition has assembled a state toolkit with some recommended measures, with Sections 5 and 6 particularly addressing prevention opportunities.

Thank you for your time and consideration,

Minerva Ringland

Climate Manager, ReFED

She/Her/Hers (Why I use pronouns)

As a member of the Santa Barbara Community, I am personally committed to the Together to Zero CAP to reduce our carbon emissions and achieve carbon neutrality by 2035.

As a mother, a grandmother, a member of the Climate Reality Project, and an environmental activist, I consider it crucial that we as a community do everything we can to ensure that the elements that contribute to climate change, including transportation, fossil fuel emissions, methane emissions, landfill emissions, among other detrimental contributors to the degradation of our climate, be reduced as far as possible, as soon as possible.

For these reasons, I support the CAP and hope it will be passed and executed in our region.

Thank you for your attention to this matter.

Rachel (Rochelle) Altman

1383 Sycamore Canyon Road

Santa Barbara, CA 93108

\_\_\_\_\_\_

Re: Draft Climate Action Plan
To Climate Action Plan Agency:
Why is the City of Santa Barbara allowing cruise ships to come into our harbor, if the goal is to be carbon neutral by 2035? Allowing even 20 cruise ships to visit our town works against any planned goal for carbon neutrality.
My family and I have witnessed for ourselves the amount of air pollution the cruise ships spew out while in our harbor. We urge that everyone involved in the Draft Climate Action Plan work to ban cruise ships from visiting Santa Barbara.
Sincerely,
The Kelly Family:
Lisa Ann
Chad
George and
Sergei

How about an increase in bed tax, property tax and sales tax (or some combination of all three to dedicate toward the community working with developers on a large scale to purchase units and hold them for use as workforce housing. An example: the city (or housing authority) purchases 200 of the planned 600 units at the Macys site, instead of the paltry 60 units planned, using the increased taxes. Getting people to live in the community instead of commute from Ventura or Lompoc or Santa Maria would go a long way toward meeting many goals for the community.

I realize taxes are a hard sell, but I think there are plenty of us in town who would be willing to pay more to see some of these problems solved. And if we're talk community solutions, we're also talking community sacrifice to make this a better place to live for everyone.

Not mentioned in your plan is train service. Admittedly it's a long shot (though it has been mentioned elsewhere) but more frequent train service would also reduce vehicular air pollution. Extending Metrolink beyond Ventura to Santa Barbara could help the many commuters who live in Ventura and work here. Also regular bus services to match the work day would benefit those who live in Lompoc and Santa Maria and other places north of the city of SB.

Susan Shields

City of SB resident

Now, please get more involved in the city's misguided cruise ship program (still at 18-20 visits per year) despite community and even harbour commission (direct beneficiaries of the \$500,000 in cruise boat use fees) generating significant air and water pollution. Santa Barbara channel Keepers has spent enormous time and money to bring this activity to light and reduce it. We all need your help.

David R. Lumley

Bestselling author of "It's Impossible to Commit to Maybe" WSJ & USA TODAY

Thanks, Santa Barbara for coming up with these ideas and plans, and for sharing them and being open for suggestions.

I do have one. Conservation.

Reduce disposables, perhaps by requiring stores to charge for bags, etc.

Make Santa Barbara a "no idling" city. I've seen CITY vehicles here running and running while a project is being worked on, with the pathetic excuse, "It's our policy." UPS knows better. They turn off there engines at every stop.

Check and see what's normal at city properties that could be made more efficient; I happen to know that a lot of shower water gets wasted at Los Banos Pool.

Thanks for asking!

As a member of the Santa Barbara Community, I am personally committed to the Together to Zero CAP to reduce our carbon emissions and achieve carbon neutrality by 2035.

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Thank you for your attention to this matter.

Rachel (Rochelle) Altman 1383 Sycamore Canyon Road Santa Barbara, CA 93108



April 24th, 2024

Mr. Jefferson Litten City of Santa Barbara Sustainability and Resilience 801 Garden Street, Suite 200 Santa Barbara, CA 93101

Re: City of Santa Barbara's Draft Climate Action Plan

Dear Mr. Litten,

The Community Environmental Council (CEC) is pleased to submit the following comments on the City of Santa Barbara's draft Climate Action Plan (CAP). Since 1970, CEC has incubated and innovated real life environmental solutions that directly affect the California Central Coast. CEC's mission is to advance rapid and equitable solutions to the climate crisis by building zero carbon communities, promoting nature-based solutions to draw down legacy emissions, and protecting communities against unavoidable climate change impacts.

CEC's climate work in Santa Barbara includes, amongst many additional initiatives and projects, advocating for Community Choice Energy and 100% renewable energy goals, starting the ElectricDrive805 coalition to make it easier to adopt electric vehicles across the tri-counties, offering our Solarize Nonprofit and Solarize Santa Barbara programs, and working with 3C-REN on energy efficiency and existing building decarbonization in single and multifamily properties. CEC is also currently partnered with the City on numerous initiatives such as the Santa Barbara County Regional Climate Collaborative and grants such as the Santa Barbara County Resilience Hubs. CEC was mentioned four times in the City's draft CAP and stands ready to help the City meet its climate action goals.

CEC congratulates staff, consultants, and the City for their excellent work on the draft CAP. CEC believes that the CAP is a tremendous opportunity for Santa Barbara to display leadership in adopting equitable, bold measures to reduce and mitigate GHG emissions and to build resilience within the City, especially in communities that have been most burdened by climate change impacts. We support strong, ambitious policies and programs that not only mitigate and limit climate change impacts throughout Santa Barbara, but that also protect our most vulnerable frontline communities. Those that have been harmed by environmental injustice and who are

likely to be hurt first and worst by the impacts of climate change should benefit first and foremost from climate and resilience action.

Santa Barbara County has also experienced and continues to face high levels of oil extraction that have caused disastrous oil spills and detrimental effects on the surrounding environment and health of its residents. Additionally, it is one of the fastest warming counties in the nation and has recently endured some of California's largest and most destructive wildfires, floods, debris flows, extreme drought and heat events. Given the historical and present context of Santa Barbara, and future threats of climate change, CEC encourages the City to:

- Take more aggressive and immediate actions to make progress on 2030 targets and uphold the City's goal of Carbon Neutrality by 2035. The current plan reduces emissions by 47% from 1990 levels by 2030, leaving too many emissions to be mitigated in the remaining 5 years until the 2035 Carbon Neutrality goal. The plan should reduce emissions by 60% by 2030, and jumpstart GHG sequestration activities.
  - The following **new measures** should be added for priority in the first year:
    - Building Electrification Ordinance for New Construction
    - Employer-sponsored Housing
  - The following **existing strategies** should be prioritized for the first year:
    - BE 5.2, Existing Building Electrification Study
    - T-5.6, On Street Parking Pricing
    - T 6.1, EV Reach Code
    - T 6.2, Commercial and Multifamily EV charging ordinance
    - T 7.1, Zero Emission Vehicle Action Plan
- Develop a framework to unlock the potential of the region's vast natural and working lands to sequester carbon. This framework should engage private sector funding such as from large businesses, the tourism, and restaurant industries to help the City meet the 2035 Carbon Neutrality goals.

CEC would like to highlight the following recommendations, changes, and clarifications to the GHG Reduction Strategies:

# **Building Electrification**

New Measure – Building Electrification Ordinance for New Construction. With the legal challenge to the City's existing Building Electrification Ordinance, a new ordinance should be immediately prioritized to ensure that new construction is primarily electric. New construction is the most cost-effective time to build all-electric. Prioritization of this ordinance will lead to decreased need for expensive retrofits in future decades.

Together to Zero Climate Action Plan:

 Pg. 13. While CEC appreciates the near term, next two-year focus on municipal buildings and the affordable housing pilot, BE 5.2 Existing Building Electrification Study is the only measure that rates "high" impact. It is also low cost. This study should be prioritized for year one and funded through Santa Barbara Clean Energy. Faster action on building electrification is imperative to meeting CAP goals and will lead to revenue growth for SBCE.

# **Transportation**

New Measure – Employer-sponsored housing. Large employers such as the City of Santa Barbara, the County of Santa Barbara, Santa Barbara Unified School District, Santa Barbara City College, and others own portfolios of properties and have many employees commuting from long distances. The Santa Barbara South Coast Chamber of Commerce is spearheading a consortium of employers to develop employer-sponsored housing. The City should lead by example and encourage other employers by developing car-free/car-light workforce, affordable, employer-sponsored housing above downtown surface parking lots. These units could target the fraction of City employees willing to live car-free in exchange for living close enough to walk to work in a prime downtown location and could have a percentage designated for other downtown workers. A core strategy to lower per capita GHGs should be by developing new housing with limited cars.

More details to prioritize future development as net zero, car-free/car-light development are included below and in Appendix 2, CEC Comments on City of Santa Barbara Draft 2023-2031 Housing Element.

# **Appendix A** (page numbers on the appendices would be helpful)

- T-3, Active Transportation Goal of 6% by 2030 and 10% by 2035 is inadequate and
  much less ambitious than other leading communities. City of San Luis Obispo has a
  similar Carbon Neutrality by 2035 goal, and their CAP aspires to increase biking to 20%,
  transit to 7%, and walking/carpool/other to 23%, with only 50% of trips being single
  vehicle occupant.
  - The CAP envisions full implementation of the Bicycle and Pedestrian Master Plans and continued implementation of Vision Zero, which are foundational actions to make active transportation easy and safe.
  - Opes the Active Transportation Goal include electric micromobility options that are rapidly proliferating, bringing new riders into the City's bike lanes? These are primarily e-bikes, including the City's B-Cycle electric bikesharing program. Recent bike counts have found that as many as half of all bikes on City streets are now e-bikes. Other electric mobility options that City residents are quickly adopting include electric scooters, electric skateboards, and electric unicycles/Onewheels.
  - Does the Active Transportation Goal capture the synergy between efforts to bring more downtown, car-free/car-light housing, employer-sponsored housing, and priced parking to the City? These developments will add active transportation users to the system.
- T-5.6, On Street Parking Pricing was the measure with the second most significant potential in the City's last Climate Action Plan, after Community Choice, yet it barely gets a mention buried in Appendix A of this plan. This measure has the strongest potential to incentivize drivers to switch to more sustainable modes and raise revenue for alternative modes. It should be modeled more extensively as a strong driver of reduced VMT and enhanced active transportation mode share. This measure should be prioritized as a near-term, first year priority, particularly with the Downtown Parking Division facing multi-million budget deficits annually in recent years.

Santa Barbara is a rare city of its size that subsidizes free on-street downtown parking. Free parking allows employees to hog the prime parking and do the 75-minute shuffle, which impacts businesses who'd like customers to park right in front of their establishment. On Street Parking Pricing is the strongest potential way to convert drivers,

particularly downtown employees, to transit and active transportation users, freeing up parking for shoppers, decreasing congestion in the urban core and yielding large sustainability benefits.

- T-6, Increase Zero-Emission Passenger Vehicle Use and Adoption to 30% by 2030 and 55% by 2035.
  - This is the most important and impactful goal in the entire plan and should be included in the Together to Zero summary, and the goal increased. The City of San Luis Obispo, with a similar Carbon Neutrality by 2035 target, has a goal of 40% ZEV miles by 2030.
  - Can the plan discuss in more detail how the California Air Resources Board's 100% ZEV sales by 2035 regulation impacts this goal? The justification in Appendix A is relatively weak and more complex modeling should be done for this strategy of paramount importance.
- T-7.1, Zero Emission Vehicle Action Plan.
  - With transportation emissions being over half of the entire community's emissions, a Zero Emission Vehicle Action Plan should be prioritized for year one to add additional strategy, planning and cohesion to the City's impressive ZEV efforts. This study should be funded through Santa Barbara Clean Energy, as faster action on transportation electrification is imperative to meeting CAP goals and will lead to revenue growth for SBCE.

### Together to Zero

- pg. 20. T 6.1, EV Reach Code should be a near-term highest priority for focus in the next year. The City has tremendous growth planned, and this code will ensure abundant EV charging infrastructure during new construction, which is the most cost-effective time to build it.
- T 6.2, Commercial and Multifamily EV charging ordinance should be prioritized for the first year. Level 1 or low power level 2 power sharing charging at multifamily and workplaces should be considered to be partially allowed to reduce costs to building owners. For example, installing 20% of all parking spots with EV chargers could be prohibitively expensive for properties undergoing major remodeling. An alternative

compliance path could allow a lesser 5% of parking spaces to install full EV chargers with 20-30% installing Level 1 or low power level 2 power sharing ports. This would allow greater EV charging access at lower overall expense.

• Pg. 21. T-3.12, Affordable, transit-oriented development should be strongly prioritized for the large amount of housing that Santa Barbara is planning for. With the limited remaining development potential in Santa Barbara, the City should disincentivize large sized market rate rental or for sale housing with parking, which we have plenty of in outlying areas of Santa Barbara. The City should incentivize workforce rental housing that prioritizes smaller, more affordable by design and car-free/car-light developments with unbundled parking and abundant electric carshare.

Employer-sponsored housing for local workers should be incentivized, with the City leading by example by constructing housing for City workers in downtown surface parking lots and other underutilized lots. These units should target the minority of City workers that are willing to live car-free lifestyles and walk to work for the opportunity of living in subsidized, choicely-located developments. The once-in-a-lifetime opportunity for redevelopment at La Cumbre Plaza and Paseo Nuevo/downtown is an opportunity to do build low VMT developments on a large scale. 100 units of housing could be built with only 10-20 parking spaces for electric carshare (trucks for when a resident wants to move or carry large items, SUVs for camping or when many passengers are needed, and efficient sedans for single occupant trips). Some developments could use severely underutilized City parking garages to offer unbundled parking spaces instead of building more parking lots.

### Waste

The City relies on the ReSource Center at the landfill for much of the diversion. While County of Santa Barbara staff assure the community that they are on track or beating benchmarks for SB 1383, in the press there have been different perspectives, such as this op-ed from CEC founder and waste expert Paul Relis. The City should have an alternative plan for meeting SB 1383 and make sure that yellow bin food waste collection is expanded and turned into high quality compost that can be utilized for natural sequestration on regional farms and

<sup>&</sup>lt;sup>1</sup> Relis, Paul. "What a Waste: Flaws at Tajiguas Must Be Examined Independently." Santa Barbara Independent, January 22, 2024.

ranches.

For Carbon Sequestration High Impact Actions CS 4.2, 4.4, and 4.5, it is imperative to involve a compost expert and contractor, and to conduct thorough testing of compost quality from the ReSource Center before making recommendations. Proper application of compost, both in terms of quality and quantity, is crucial for achieving measurable changes in carbon sequestration. If the compost being produced fails to meet acceptable minimum standards outlined in sampling protocols, it is recommended that actions be suspended until the quality meets standards. This approach ensures that carbon sequestration efforts are conducted responsibly and effectively, benefiting both the environment and the community.

### Appendix A

• Measure W-4, Reduce Organic Waste 80% below 2014 levels by 2030 and 85% by 2035. The City commercial composting program has a large potential to provide high quality compost that could be used in surrounding natural and working lands to sequester carbon and improve soil. How much organic waste is being collected annually? How much compost is being generated and how is it being utilized? Is the Resource Center digestate being trashed and will this digestate ever be sufficient high quality to use on local farms and ranches? If not, what steps could the City take to ensure our food and green waste is being used to make compost and used for carbon sequestration? If the compost being produced is not to the acceptable levels of being used on local agricultural operation, is there a plan to use this compost instead at parks and along highways? How much high-quality compost could be produced from current organic waste? How can the ReSource center ensure that plastics and glass are not making their way into finished compost?

### Together to Zero

W 4.10 - Facilitate the reduction of single use items and promote practicing circular
economics. Partner with the Harbor, Airport and other major Santa Barbara facilities to
expedite no single use plastic practices. This section could include specifics; a local
group has been asking the airport to refrain from selling bottled water for a while. The
City should also pledge to add hydration stations to all major facilities.

- W 4.12 Ban items without means of recycling or recycling markets, such as polystyrene, produce bags, plastic packaging, straws, plastics #4-7, and mixed materials. The City has already done this with the exception of plastic packaging. The City should look closely at ways to reduce plastic packaging and mylar balloons, similar to what Goleta did in 2022. The City should update regulations to match Goleta's.
- W 4.13 Implement pilot projects for reusable dining to-go containers. The City should consider what the City of Berkeley and ReThink Disposable in the Bay Area have already done to incentivize reusable dishware for dine-in and takeout.
- W 4.15 Partner with libraries and other existing facilities to expand programs to reduce single use items and promote reuse and repair. Leverage Library of Things program and develop "fix it" resources for the community. The City should also add hydration stations to all libraries and other facilities.

### **Carbon Sequestration**

### Appendix A

CS 1.4 carbon sequestration analysis. This measure should be prioritized in the first two
years to jumpstart work on using the region's vast natural and working lands to sequester
carbon, build healthy soil, and offset the City's GHG emissions. The current CAP
forecasts significant GHG emissions in the City by the 2035 Carbon Neutrality Goal.
With only 11 years until 2035, now is the time to lay the foundation for a carbon
sequestration strategy.

The City has a reputation as an environmental leader and innovator and has a large restaurant and tourism industry that could jumpstart increased sequestration from regional farms and ranches. Entities such as Zero Foodprint are working with leading local governments to unlock private sector investment in natural sequestration. The City should seize the opportunity to pioneer new strategies and financing mechanisms to help lead California's emerging efforts on natural sequestration.

### Appendix 1: A Framework for Carbon Sequestration in Natural and Working Lands

The Community Environmental Council strongly urges the City of Santa Barbara to increase its commitment to implement nature-based solutions (NBS) in its Climate Action Plan. The City has set a goal of Carbon Neutrality by 2035. However, the current draft CAP only includes measures for a 47% reduction in GHGs. NBS carbon sequestration **along with** enhanced emission reduction measures are needed to meet the City's Carbon Neutrality goal. The City is also in a unique position to unlock private investment from the tourism, restaurant, and business community to catalyze NBS sequestration on the vast ranches and farmlands of Santa Barbara County and the Central Coast.

A NBS sequestration approach would be similar to how other leading California jurisdictions are meeting their climate goals. The County of Sonoma has a goal of carbon neutrality by 2030, with ambitious reduction measures and a large emphasis on using natural and working lands to sequester carbon. The County of Marin has a goal of a 60% reduction in GHGs by 2030, with a mix of mitigation plus sequestration.

An additional 297,689 MTCO2e of emission reductions or sequestration is needed to meet the Carbon Neutrality Goal, with additional measures or sequestration past 2030 TBD. Below we present an outline of how the City could sequester 200,000 MTCO2e and monitor, report on, and retire the benefits through the California Natural Resources Agency's California Carbon Sequestration and Climate Resiliency Project Registry. [3]

The County of Santa Barbara invested in several reports and studies analyzing carbon stock and NBS applicability. A TerraCount report, which inventoried carbon stocks, found that natural and working lands (NWL) account for 139 million MTCO2e or approximately 90% of the county's terrestrial carbon stocks. [4] In 2018, a study was released that showed that of Santa Barbara's 1.3m acres of NWL, 269,588 acres [5] were appropriate for compost application. A 2020 report done by the Cachuma Resource Conservation District [6] found that on the Gaviota Coast alone, applying compost to 11,190 acres would lead to 48,600 MTCO2e sequestered per year, along with increased water holding capacity of 2.7 million gallons annually. It is important to note that

the Gaviota Coast is a small fraction of Santa Barbara County. Compost application is a particularly important NBS as it synergistically creates upstream GHG benefits through incentivizing the diversion of organic waste from landfills, thereby meeting the goals of SB 1383.

The State has also set a precedent with its cap-and-trade funded Healthy Soils Incentive Program, which received \$70 million in funding in 2022, to prioritize investments in these solutions. This program utilizes CDFA's COMET-Planner, a GHG reporting model, to project GHG reductions as a result of climate-smart agriculture implementation. According to COMET-Planner, which is utilized by the State to model GHG benefits of its cap-and-trade programs, 24 tons of compost per acre applied on Santa Barbara County range sequesters 4 MT C02e annually.

The State also passed SB27, a bill that requires the creation of a nature-based climate project registry. CEC recommends that the City utilize this database to inventory current and potential nature-based projects in order to increase NBS visibility and draw investment to the region.

Below is a table that outlines the potential to sequester an additional 200,000 MTCO2e annually utilizing a select list of nature-based solutions as reported in COMET-Planner. The City should lead development of a local NWL sequestration market that helps mobilize private finance to develop projects on our vast farms and ranches. The City's draft CAP has planned for only a 47% reduction in GHG emissions, and NWL sequestration solutions along with enhanced emission reduction measures are needed in order to meet the City's Carbon Neutrality Goal.

Practice	Acreage	CO2e
Compost on rangeland	20,000	86,820
Compost on cropland	20,000	83,220
Prescribed Grazing	200,000	1,680
Silvopasture	4,500	2,950
Riparian Forest Buffer	1,100	1,950
Cover crop in orchards or vineyards	10,000	16,360
Cover crop on irrigated cropland	10,000	3,950

Hedgerow	189	1,880
No-till on cropland	10,000	1,620
TOTAL	275,789	200,430*

<sup>\*</sup>This is an annual calculation and many of these practices have proven multi-year benefits. For example, silvopasture, or planting trees on grazing land would have at least a 10-to-15-year GHG sequestration benefit, allowing the 2,950 MTC2e number above to reach 29,500 over the first decade.

These suggestions combine to cover 275,789 acres, or approximately 20% of Santa Barbara County's NWL. By comparison, Marin County estimates it can offset 185,795 CO2e through nature-based and climate-smart agricultural management solutions, despite less than one twelfth of Santa Barbara's NWL, underscoring the need for the County to adopt a more ambitious NWL target.

<sup>&</sup>lt;sup>[1]</sup> Sonoma County Regional Climate Protection Authority. "Sonoma Climate Mobilization Strategy." March 2021. https://rcpa.ca.gov/wp-content/uploads/2020/12/Sonoma-Climate-Mobilization-Strategy-Adopted-2021-03-08.pdf

<sup>[2]</sup> Marin County Unincorporated Area. "CLIMATE ACTION PLAN 2030." (n.d.). https://www.marincounty.org/-/media/files/departments/cd/planning/sustainability/climate-and-adaptation/cap-2030\_12082020final.pdf

<sup>[3]</sup> California Natural Resource Agency. "California Carbon Sequestration and Climate Resiliency Registry Project." <a href="https://climateprojectregistry.resources.ca.gov/">https://climateprojectregistry.resources.ca.gov/</a>

<sup>[4] 2030</sup> Climate Action Plan: Natural and Working Lands and TerraCount, Natural and Working Lands Carbon Inventory (Ser. July 2021).

<sup>[5]</sup> Potential Acreage in Santa Barbara County for Compost Application on Rangeland (Ser. 2018).

<sup>[6]</sup> Cachuma Resources Conservation District and LegacyWorks Group. "Gaviota District Carbon Management Plan." March 2020. https://www.gaviotacoastconservancy.org/gaviota-district-carbon-management-plan/

Appendix 2 CEC Comments on City of Santa Barbara Draft 2023-2031 Housing Element





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July 28th, 2022

Rosie Dyste Project Planner City of Santa Barbara

Via email to: HEU@SantaBarbaraCA.gov

Re: City of Santa Barbara draft 2023-2031 Housing Element

Dear Ms. Dyste,

Community Environmental Council has reviewed the draft 2023-2031 Housing Element and generally supports the City's approach to building more housing in the City. We strongly support policies that lead to more affordable infill housing that is sustainable by design, enables residents to live car-free or car-lite lifestyles, and that prioritizes housing Santa Barbara's workforce and correcting the jobs/housing imbalance. We offer the following comments on specific Housing Element Goals:

Goal 1 Create New Housing: Create new healthy, safe, and energy-efficient housing that meets community needs, within our resources.

SBCAG estimates that tens of thousands of commuters drive to the South Coast from Ventura County and North County Santa Barbara, clogging freeways and leading to significant greenhouse gas emissions. Easing the jobs/housing imbalance is a major priority for sustainability and for local employers. The City should maximize opportunities and incentives for denser, infill multifamily projects that:

- Are close to transit and active transportation options to prioritize affordable options for residents who want to live car-free or car-lite lifestyles
- Incorporate smaller units that are more affordable and sustainable by design
- Reduce parking maximums and unbundle parking to minimize the high additional cost that unnecessary parking adds to units

- Incorporate carsharing where possible
- Focus on all-electric, energy-efficient units that are affordable for residents

HE-2: La Cumbre Specific Plan – CEC supports planning elements that maximize housing affordability and ease of transit and active transportation modes. Design that encourages carcentric lifestyles should be avoided.

### Goal 2 - Prioritize Affordable Housing

CEC supports the proposed Affordable Housing Overlay Zone and efforts to encourage development of more affordable housing. While CEC supports the Zone's lower parking requirements, we would go further and recommend minimal parking be developed, and parking spots to be offered unbundled at market rates. Minimizing parking has a large impact on increasing affordability, and those residents lucky enough to secure subsidized housing should not have their private auto use also subsidized. Affordable developments should prioritize robust transit, active transportation, and carsharing usage.

CEC appreciates the opportunity to comment on the draft 2023-2031 Housing Element and is ready to assist the City in efforts to create more sustainable, affordable housing in Santa Barbara.

Sincerely,

Michael Chiacos

**Director of Climate Policy** 



714 Bond Avenue Santa Barbara, CA 93103 805.563.3377

April 24, 2024

Melissa Hetrick Sustainability and Resilience Department City of Santa Barbara P.O. Box 1990 Santa Barbara, CA 93102

Re: Santa Barbara City Climate Action Plan

Dear Ms. Hetrick,

We applaud the City of Santa Barbara for putting together a bold and ambitious roadmap for our community to achieve carbon neutrality by 2035. Thank you for the opportunity to review and provide comments on the City of Santa Barbara's aspirational Climate Action Plan (CAP), *Together to Zero*. Santa Barbara Channelkeeper is a local 501(c)3 environmental nonprofit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through science-based advocacy, education, fieldwork, volunteer engagement, and enforcement. While recognizing that transportation is the greatest contributor of greenhouse gas emissions, our comments are focused on strong water conservation, Low Impact Development (LID), and carbon sequestration analyses, which are all important actions to help the City of Santa Barbara reach its carbon neutrality goals over the next decade.

Channelkeeper supports prioritizing water conservation and believes that conservation strategies should be the first line of defense against drought. Conservation has the added benefits of saving energy and reducing greenhouse gas emissions. Although water delivery and wastewater only contribute approximately 3.6% of emissions in the City according to the graph on page 27, we would like more information on how the operations of the desalination facility factor into this calculation. While the desalination facility is currently contributing about 30% of the City's water demands, it is extraordinarily energy intensive and one of the largest energy users in the City. Implementing water conservation strategies will play an important role in ensuring that the desalination plant will not need to be expanded to meet future demands during dry years.

In 2022 Governor Newsom released a water strategy that calls for conserving at least 500,000 acre-feet of water through more efficient energy use and conservation by 2030¹. The Letter to the Community included on page one of the CAP states that "The task before us is not just about reducing emissions. It is about setting the cornerstones for a resilient, prosperous, and sustainable community...." As such, further reducing potable water consumption will be a critical step for our community to become more resilient and adapt to our changing climate. And in addition to lowering energy use and greenhouse gas emissions, conserving water is the cheapest and fastest way to meet our water demands.² We recommend adding additional bullets in the "What can you do" box on page 30 to include the following: replace inefficient appliances and fixtures, replace lawns with climate resilient plants, and reduce water loses from leaks. These three measures are estimated to reduce urban water use by 30%-48%.³

In addition to water conservation included in the "Water, Solid Waste, and Wastewater Measures", we suggest including a measure that addresses a comprehensive investment in our wastewater infrastructure to ensure that these systems function effectively. Aging infrastructure can fail, which results in beach closures and community impacts, as well as increased nutrients into our freshwater and coastal marine environments that can lead to harmful algal blooms.

The CAP does not mention Low Impact Development. LID includes many stormwater management methods that mimic or preserve natural drainage processes. Benefits of retaining water on site to allow it to soak into the ground instead of rapidly running offsite includes improving water quality by reducing stormwater runoff, reducing flooding events, and improving groundwater recharge. However, most relevant in the context of climate change, implementing LID can help to cool urban areas by decreasing impervious surfaces and providing shading, which also helps to save energy<sup>4</sup>. Although the City is built out, there are still many opportunities to include LID practices and strategies, particularly as part of redevelopment plans. We suggest incorporating LID strategies in the Building Energy Use section to capture additional opportunities to lower energy use of the built environment.

Because many LID strategies use vegetation such as in rain gardens, LID can also play an important role in carbon sequestration. In a recent study, life cycle assessments were conducted on several types of LID including green roofs, rain gardens, bioretention basins, and vegetated swales. This study showed that between 45% and 70% of the carbon

<sup>&</sup>lt;sup>1</sup> California's Water Supply Strategy. 2022. Accessed at: https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Water-Resilience/CA-Water-Supply-Strategy.pdf

<sup>&</sup>lt;sup>2</sup> https://conserve4ca.org.

<sup>&</sup>lt;sup>3</sup> Cooley, H., Thebo, A., Abraham, S., Shimabuku, M., Gleick, P., Diringer, S. (2022). *The Untapped Potential of California's Urban Water Supply: Water Efficiency, Water Reuse, and Stormwater Capture*. Pacific Institute.

<sup>&</sup>lt;sup>4</sup> United States Environmental Protection Agency. (2012). *Benefits of Low Impact Development*. Available at: https://www.epa.gov/sites/default/files/2015-09/documents/bbfs1benefits.pdf

footprint of these technologies were mitigated by the carbon sequestration<sup>5</sup>. Because of the carbon sequestration potential, we suggest incorporating LID technologies into the Carbon Sequestration section of the CAP.

In addition to expanding the Carbon Sequestration to include LID strategies, we suggest moving CS 2.4 "Develop a Citywide, or participate in a regional, carbon sequestration analysis and plan to explore opportunities to increase sequestration in the City" to a prioritized action for the next two years. Nature-based solutions to sequester carbon have the co-benefits of enhancing our open spaces, biodiversity, water quality, recreation, tourism, and protecting our oceans. It is imperative that our City's Climate Action Plan prioritizes solutions that protect and enhance the important carbon sinks offered by our coastal ecosystems and riparian habitats. It is estimated that coastal ecosystems have the capacity to sequester four to ten tons of carbon dioxide per hectare each year, accounting for almost half of the total carbon sequestered in ocean sediments, despite covering less than two percent of the ocean floor<sup>6</sup>. Including a comprehensive analysis of the benefits derived from these habitats and the ecosystem services they provide would be useful information to have in the beginning of the ten-year roadmap outlined in the CAP.

Thank you for your consideration of these comments for the City of Santa Barbara's Climate Action Plan. We look forward assisting our community make significant and important progress towards carbon neutrality over the next ten years.

Sincerely,

Molly Troup

Science & Program Manager

Molly Droup

<sup>&</sup>lt;sup>5</sup> Kavehei, E., Jenkins, G.A., Adame, M.F., Lemckert, C. (2018). Carbon sequestration potential for mitigation the carbon footprint of green stormwater infrastructure. Vol. 94, pages 1179-1191. https://doi.org/10.1016/j.rser.2018.07.002.

<sup>&</sup>lt;sup>6</sup> Gustafsson, C. (2021) Healthy coastal ecosystems are crucial to mitigate climate change, Baltic Sea Center. Available at:

https://www.su.se/polopoly\_fs/1.573461.1632479641!/menu/standard/file/PBbluecarbonEngWEBB.pdf.

## SONOS

July 23, 2024

Mr. Jefferson Litten
Energy & Climate Manager
City of Santa Barbara
Sustainability & Resilience
801 Garden St., Suite 200, Santa Barbara, CA 93101

Dear Mr. Litten,

I am writing in support of the proposed Climate Action Plan of the City of Santa Barbara.

Sonos was founded in downtown Santa Barbara in 2002 and has since become a leading sound experience company around the world. Three years ago, we set an ambitious goal to become carbon neutral by 2030 and achieve net zero by 2040. We are strongly focused on reducing our own emissions with meaningful reduction targets in the areas of product energy usage, distribution & logistics, and our supply chain. You can learn more about our plan at <a href="mailto:susatainability.sonos.com">susatainability.sonos.com</a>.

Our plan also calls for the use of carbon offsets to reach our goals. We therefore believe the City of Santa Barbara would be served through a regional market for carbon offsets. Such a market would enable Sonos to invest in climate mitigation and resilience in our own backyard, benefiting the planet and our local communities. In FY22, our emissions totaled roughly 1 million metric tons of carbon dioxide equivalent, underscoring the economic opportunity for the City to support local carbon offsets.

We are encouraged that the City is centering equity in the Climate Action Plan. We support diversity, equity, and inclusion in our workforce, and we believe that we need all communities to have a seat at the table when addressing climate change.

Please feel free to contact me if you'd like to learn more about Sonos' sustainability initiatives or to discuss how the City's Climate Action Plan will impact local companies.

Sincerely, Deji Olukotun

Director of Global Affairs & Sustainability Sonos







January 13, 2020

Zero Foodprint

Via email: Karen@zerofoodprint.org; Anthony@zerofoodprint.org

Dear Ms. Leibowitz and Mr. Myint:

Congratulations on the official launch of Restore California! We'd like to thank you, along with the rest of the Zero Foodprint staff, for your tireless work to create this program. The leadership at the California Department of Food and Agriculture (CDFA), California Air Resources Board (CARB), and the California Environmental Protection Agency (CalEPA) recognize how crucial the actions of private industry are for improving our soil health and contributing to California's fight against climate change.

Restore California's novel approach empowers the restaurant industry and restaurant patrons to support California farmers in expanding their healthy soil management practices. Our common understanding is that healthy soils are the foundation of our robust agricultural system and key to addressing climate change. We believe your program can be a vanguard for similar efforts in other industries within California and beyond.

We hope that the tools CARB and CDFA have developed for the Healthy Soils Program will be helpful in quantifying the positive impact that Restore California will have on the agricultural industry and the people of California. We hope that Restore California's success can serve as a model for climate action and look forward to finding additional ways to collaborate in the future.

Sincerely,

Karen Ross

Secretary

California Department

of Food and Agriculture

Mary D. Nichols

Chair

California Air Resources

Upy & Vlichol from

Board

Jared Blumenfeld

Secretary

California Environmental

Protection Agency





# CLUE Santa Barbara Clergy and Laity United for Economic and Social Justice 1500 State Street, Santa Barbara, CA 93101 clue@cluesb.org

### April 23, 2024

Subject: Public Comment on the Santa Barbara Climate Action Plan

Dear Santa Barbara City Staff and Honorable City Council Members,

Clergy and Laity United for Economic Justice (CLUE), a Santa Barbara-based interfaith organization, expresses its gratitude for the opportunity to provide public comment on the City's draft Climate Action Plan (CAP). CLUE brings together clergy and laypeople from diverse religious backgrounds, united by a mission to promote economic justice, social equity, and the dignity of all. We are deeply committed to ensuring a sustainable future for our city.

Faith communities across the nation, including CLUE's Environmental Justice Workgroup, are actively engaged in environmental stewardship. We believe we have a responsibility to care for God's creation and advocate for policies that address the environmental burdens disproportionately impacting marginalized communities.

CLUE partners with numerous organizations, including 350.org, the League of Women Voters, CAUSE, and the Community Environmental Council, striving to create a just and sustainable Santa Barbara.

We commend the CAP for its strong foundation, including clear carbon neutrality goals and a multi-pronged approach. Several parts of the CAP **lack the sense of urgency** that we feel would be more productive and more realistic to be positively impactful. We also believe further details, **regional cooperation**, and **community engagement** would strengthen the plan, particularly in the following areas:

Consultation with Low-Income and Marginalized Communities: The plan should ensure inclusive participation by providing translated materials and actively soliciting feedback from Spanish-speaking communities. Mitigation efforts must prioritize the well-being of vulnerable residents and promote a "just transition" to clean energy that supports renters facing potential cost increases.

**Energy Conservation and green energy production:** The plan should place greater emphasis on energy conservation alongside transitioning to clean energy sources. Lifestyle changes and energy-efficient retrofits, such as utilizing shade, air-drying clothes, biking, and improving air filtration, can significantly reduce energy consumption. More effort should also be applied to increasing the use of public assets for green energy production. We advocate for updates every year on emerging technologies, assessments of current programs and methods, as well as successful solutions that are found to be effective in other communities.

**Housing Costs and Commutes:** High housing costs and density restrictions contribute to Santa Barbara's carbon footprint by forcing many workers to commute long distances. The CAP should address the affordable housing issue through regional collaboration.

**Wildfire Prevention:** Wildfires are major greenhouse gas contributors. The plan should prioritize building resilient communities and regional leadership in wildfire prevention efforts.

CLUE strongly recommends that the City of Santa Barbara prioritizes **climate justice** to ensure all community members can participate in a just transition to a sustainable future. We are eager to collaborate and share a more comprehensive

analysis with detailed recommendations that leverage CLUE's network of faith communities and social justice activists. We believe this collaboration is instrumental in shaping a just and sustainable Santa Barbara.

Thank you again for the opportunity to contribute.

Sincerely,

Environmental Justice Workgroup

R Lane Charle

Clergy and Laity United for Economic Justice (CLUE)