



**COUNTY OF SANTA BARBARA  
CALIFORNIA**

**MONTECITO PLANNING COMMISSION**

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TO THE HONORABLE COUNTY PLANNING COMMISSION  
COUNTY OF SANTA BARBARA, CALIFORNIA

MONTECITO PLANNING COMMISSION  
HEARING OF SEPTEMBER 17, 2014

**RE: *Energy and Climate Action Plan; 14GPA-00000-0003***

Hearing on the request of the Planning and Development Department that the Montecito Planning Commission:

- a) **14GPA-00000-00003.** Recommend that the County Planning Commission recommend the Board of Supervisors adopt a Comprehensive Plan amendment to incorporate Policy 8.3 and Research Action 8.3.1 into the Santa Barbara County Comprehensive Plan Energy Element requiring implementation of the ECAP with provisions for monitoring and updating at least every five years; and
- b) **14EIR-00000-00003.** Recommend that the County Planning Commission recommend the Board of Supervisors certify the Environmental Impact Report pursuant to the State Guidelines for Implementation of the California Environmental Quality Act. (Continued from 8/25/14)

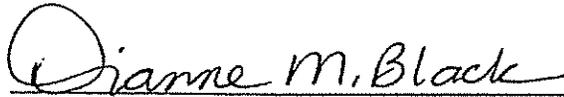
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Dear Honorable Members of the Board of Supervisors:

At the Montecito Planning Commission hearing of September 17, 2014, Commissioner Phillips moved, seconded by Commissioner Brown and carried by a vote of 4 to 0 (Commissioner Burrows absent) to:

1. Recommend that the County Planning Commission recommend to the Board of Supervisors a restructured Energy and Climate Action Plan that includes the following three elements: 1) the plan is incentive-based and includes only voluntary measures; 2) the plan eliminates mandatory point-of-sale and energy audit measures; and 3) implementation funding should be used to increase public awareness of conservation and available incentives through outreach and education campaigns.

Sincerely,



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Dianne M. Black  
Secretary to the Montecito Planning Commission

cc: Case File: 14GPA-00000-00003  
Planning Commission File  
Dianne M. Black, Director Development Review  
Brian Pettit, Deputy County Counsel  
David Lackie, Interim Deputy Director  
Heather Allen, Planner

DMB/dmv

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**SANTA BARBARA MONTECITO PLANNING COMMISSION**  
**Staff Report for County of Santa Barbara Energy and Climate Action Plan**

Hearing Date: August 25, 2014  
Staff Report Date: August 5, 2014  
Case No.: 14GPA-00000-00003  
Environmental Document: 14EIR-00000-00003

Interim Deputy Director: David Lackie  
Division: Long Range Planning  
Staff Contact: Heather Allen  
Phone No.: (805) 884-8082

## 1.0 REQUEST

Hearing on the request of the Planning and Development Department that the Montecito Planning Commission:

- 1.1 **Case No. 14GPA-00000-00003.** Recommend that the County Planning Commission recommend the Board of Supervisors adopt a Comprehensive Plan amendment to incorporate Policy 8.3 and Research Action 8.3.1 into the Santa Barbara County Comprehensive Plan Energy Element requiring implementation of the ECAP with provisions for monitoring and updating at least every five years.
- 1.2 **Case No. 14EIR-00000-00003.** Recommend that the County Planning Commission recommend the Board of Supervisors certify the Environmental Impact Report pursuant to the State Guidelines for Implementation of the California Environmental Quality Act.

## 2.0 RECOMMENDATION AND PROCEDURES

- 2.1 **Case No. 14GPA-00000-00003.** Follow the procedures outlined below and recommend that the County Planning Commission recommend the Board of Supervisors to approve Case No. 14GPA-00000-00003 as shown in Attachment A based on the ability to make the appropriate findings. Your Commission's motion should include the following:
1. Recommend that the County Planning Commission recommend to the Board of Supervisors that the Board of Supervisors make the findings for approval of the proposed Comprehensive Plan amendment (Attachment A of this staff report), including CEQA findings; and
  2. Recommend that the County Planning Commission recommend to the Board of Supervisors that the Board of Supervisors certify the Energy and Climate Action Plan Final Environmental Impact Report (Final EIR) (State Clearinghouse No. 20144021021) (Attachment C) for Case No. 14GPA-00000-00003 pursuant to the State Guidelines for Implementation of the California Environmental Quality Act (CEQA); and
  3. Adopt a Resolution recommending that the County Planning Commission recommend to the Board of Supervisors that the Board of Supervisors approve Case No. 14GPA-00000-00003 incorporating Policy 8.3 and Research Action 8.3.1 into the Santa Barbara County Comprehensive Plan Energy Element (Attachment D of this staff report); and

4. Adopt a Resolution recommending that the County Planning Commission recommend to the Board of Supervisors that the Board of Supervisors accept and adopt the Energy and Climate Action Plan including Staff's recommended revisions to emission reduction measures BE 2 (Energy-Efficient Renovations) and BE 4 (Energy Scoring and Audits), as reflected in the August 25, 2014 Montecito Planning Commission Staff Report.

Please refer the matter back to staff if your Commission takes other than the recommended action for development of appropriate materials and/or findings.

The Final EIR and all documents referenced therein may be reviewed at the Planning and Development Department Offices located at 123 East Anapamu Street, Santa Barbara and 624 W. Foster Road, Santa Maria, CA 93455. The EIR is also available for review at the Central Branch of the City of Santa Barbara Library, 40 East Anapamu Street, Santa Barbara.

### **3.0 JURISDICTION**

- 3.1 **Case No. 14GPA-00000-00003.** Government Code sections 65353 and 65354 require that "[t]he Planning Commission" make a written recommendation to the legislative body on amendment of a general plan. Consideration and recommendation regarding general plan amendments is within the jurisdiction of the County Planning Commission (County Code § 2-25.2(b)(2)), unless the property affected by proposed amendments is solely located within the Montecito planning area, which this general plan amendment is not. However, for General Plan amendments, the Montecito Planning Commission may provide recommendations to the County Planning Commission (County Code § 2-25.2(b)).

### **4.0 SUMMARY, INTRODUCTION AND BACKGROUND**

#### **4.1 Summary**

The Climate Action Strategy is being developed pursuant to Board of Supervisor (BOS) direction under BOS Resolution 09-059 which adopted the County Climate Change Guiding Principles and directed staff to "take immediate, cost effective and coordinated steps to reduce the County of Santa Barbara's (County) collective greenhouse gas emissions (GHG) emissions." The Energy and Climate Action Plan (ECAP, Plan) is the second phase of the County's Climate Action Strategy which seeks to reduce GHG in the County. The ECAP includes a baseline GHG emissions inventory, a forecast of emissions to both 2020 and 2035, a GHG reduction target of 15% below baseline emissions by 2020, a set of emission reduction measures (ERMs, Measures) to meet the target, and a methodology for tracking and reporting emissions in the future. When developing the ERMs, staff took a conservative approach to identifying and quantifying meaningful measures which could feasibly be implemented at the county government level. The quantification of each measure was also completed using conservative assumptions to model realistic implementation of the proposed measures.

To provide greater flexibility and reduce costs associated with pending housing transactions or building permit costs staff recommends modification of ECAP Measure BE 2 (Energy-Efficient Renovations) and Measure BE 4 (Energy Scoring and Audits) as analyzed in Alternative 3 of the proposed Final EIR. Measure BE 2 and Measure BE 4 are related to efficiency of buildings, both existing and new constructions and have mandatory requirements. Modifications to Measure BE 2 and Measure BE 4 would result in a smaller reduction of GHG emissions than the proposed project. However, the ECAP and proposed changes to the Comprehensive Plan's Energy Element would commit the County to meeting a 15% reduction target. The County will be conducting regular monitoring of community emissions and the implementation of reduction measures, as specified in Chapter VI of the ECAP. If the County determines that emissions are not being reduced as anticipated, the implementation and monitoring protocols in the ECAP will require County staff and decision makers to develop additional reduction measures and to increase implementation of existing strategies to meet the 15% reduction target. Staff's recommended modifications to Measure BE 2 and Measure BE 4 are shown below:

- Measure BE 2 (Energy-Efficient Renovations): Require energy audits for all building permits valued greater than ~~\$15,000~~ \$40,000, offer expedited building permit plan check for implementing audit recommendations, and consider providing a rebate for completing the audit or a waiver of building permit fees if upgrades were completed.
- Measure BE 4 (Energy Scoring and Audits): Require residential property owners to complete energy audits at the time of building sale. ~~or comply with a specified set of energy efficiency upgrades to their home at the time of building sale or within a year from the close of escrow, properties sold multiple times must only comply once.~~

If your Commission and the County Planning Commission concur with Staff's recommendation, the proposed ECAP will be updated to incorporate modifications to Measure BE 2 and Measure BE 4 prior to the Board of Supervisor's adoption hearing.

## **4.2 Introduction**

The purpose of this ECAP is to demonstrate the County's continued commitment to reduce GHG emissions while protecting the aesthetic qualities and unique resources of Santa Barbara County. The ECAP is intended to streamline future environmental review of projects within the unincorporated county. Consistent with the County's land use authority, the Plan focuses on community-wide activities within the unincorporated portions of Santa Barbara County.

Strategies and measures identified in the ECAP build on the County's innovative work to date, serving to protect natural systems, reduce emissions and waste, improve energy and water efficiency, and ensure long-term access to reliable, clean, and affordable energy. The ECAP outlines the County's commitment and strategy to adapt to a changing climate, as well as to protect the built environment, public health and welfare, and natural resources from the vulnerabilities caused by changing climate conditions.

As a producer, regulator, and incentivizer of GHG reduction efforts, the County is providing leadership across the region by implementing a multi-pronged strategy to reduce GHG

emissions. In 2010, the County of Santa Barbara General Services Department prepared the Sustainability Action Plan (SAP) for County Operations. The SAP is a separate, more detailed reduction strategy for County operations that identifies operational changes, capital projects, and equipment or vehicle upgrades necessary to create the desired emissions reductions. The SAP addresses the County's role as a producer of GHG emissions. The SAP places a strong focus on energy efficiency in the County's municipal operations. The ECAP address the second and third roles: that of regulator for community wide production of GHG emissions and incentivizer to reduce GHG emissions.

In 2013, the General Services Department developed the Energy Action Plan: Efficient Electricity Use in County Facilities (EAP) to establish goals for electricity reduction by identifying actual electricity efficiency projects at County facilities, with a primary focus on electricity consumption. The EAP leverages the efforts of the SAP by defining specific projects and their associated cost and electricity savings that can be implemented throughout the County, particularly since electric energy is a major component of reducing GHG emissions and has a direct effect on most of the emissions categories established by the County's GHG emissions inventory.

The ECAP will act as an implementation tool to identify actions to reduce GHG emissions. The reduction measures described in the ECAP are consistent with the policy provisions contained in the Santa Barbara County Comprehensive Plan and have been developed in order to achieve a GHG reduction target of 15% reduction below the 2007 baseline emissions inventory by the year 2020. ECAP implementation will assist the state in meeting its statewide GHG reduction established by AB 32, as well as the statewide energy reduction goals in California's Long-Term Energy Efficiency Strategic Plan.

### **4.3 Background**

In March 2009, the County BOS directed County staff "to take immediate, cost effective, and coordinated steps to reduce the County's collective GHG emissions".<sup>1</sup> In response to this direction, the County's Climate Action Strategy (CAS) was developed, which includes a two-phase strategy to reduce GHG emissions comprising (1) the Climate Action Study, including a countywide GHG inventory, forecast, and evaluation of potential ERMs, and (2) an Energy and Climate Action Plan, which, if adopted, would seek to reduce the County's GHG emissions through implementation of selected ERMs with the goal of achieving a GHG reduction target of 15% below 2007 baseline emissions by 2020.

The County Long Range Planning Division prepared the Santa Barbara Climate Action Study in 2011.<sup>2</sup> The purpose of the study was to:

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<sup>1</sup> Santa Barbara County Comprehensive Plan: Energy Element. Adopted 1994; amended May 2009.

<sup>2</sup> Santa Barbara County Climate Action Study, 2011.

- Demonstrate the County's commitment to the Climate Change Guiding Principles, as adopted by the BOS, by identifying possible existing and future GHG reduction measures and programs.
- Set the framework for the County to comply with the goals and requirements of AB 32 and SB 97, based on an inventory of the County's current and projected GHG emissions (the countywide GHG inventory and forecast are described below).
- Identify the next steps toward meeting the state's GHG emissions reductions target.

After preparing the Climate Action Study in 2011, the Long Range Planning Division initiated the second phase of the County's CAS with preparation of this ECAP. To develop this ECAP, County staff engaged the public through community education about climate action planning and related implications for land use policy in Santa Barbara County. Public outreach included a community visioning workshop, participation in the Santa Barbara Earth Day Festival, stakeholder meetings, and an online survey.

In February 2013, the Board received a briefing on the development of the ECAP and set a 15% GHG reduction target that included implementation of the Sustainable Communities Strategy (SCS), and to complete a feasibility study on implementing Community Choice Aggregation (CCA). Additionally, the Board requested that measure BE 2 - Energy-Efficient Renovations and BE 4 - Energy Scoring and Audits be further researched. Specifically, the Board requested that for BE 2 the trigger of \$10,000 building permit value to require an energy audit be evaluated to determine if that is the appropriate level.

## **5.0 PROJECT DESCRIPTION**

### **5.1 Energy and Climate Action Plan**

Local governments play a primary role in reducing GHG emissions and mitigating the potential impacts of climate change. The County has a long-standing commitment to implementing sustainable policies, incentives, and programs to proactively reduce GHG emissions. The ECAP provides the unincorporated county's strategy to reduce GHG emissions from numerous ERM's and actions. The County recognizes the characteristics of the unincorporated county's diverse communities and has worked with the public to ensure that the ECAP provide additional benefits to the community. In addition to reducing GHG emissions, implementation of the ERM's identified in the ECAP also provide community benefits such as reduced utility bills, greater transportation options, natural resource protections, reduced water use, economic growth, and enhanced quality of life.

Specifically, the ECAP accomplishes the following:

- Provides a GHG emissions baseline from which to benchmark GHG emissions reductions.

- Demonstrates the County's strategy to reduce the county's GHG emissions by 15% from baseline emissions by 2020, consistent with the reduction target of AB 32.
- Helps to increase the community's resilience to the effects of climate change.
- Provides a policy document with specific implementation measures to be considered as part of the planning process for future development projects.
- Provides a list of specific actions that will reduce GHG emissions, with the highest priority given to actions that provide the greatest reduction in GHG emissions and benefit the community at the least cost.
- Identifies the County's energy strategy to achieve energy efficiency goals and targets, in addition to the overall GHG emissions reductions.
- Implements programs that integrate with the State of California's long-term energy efficiency goals.
- Establishes a qualified reduction plan consistent with CEQA Guidelines Section 15183.5(b) from which future development within the unincorporated county can tier and thereby streamline the environmental analysis necessary under CEQA.

The ECAP includes a baseline GHG emissions inventory, a forecast of emissions to both 2020 and 2035, a GHG reduction target of 15% below baseline emissions by 2020, a set of ERMs to meet the target, and a methodology for tracking and reporting emissions in the future.

The ECAP's jurisdiction applies to the unincorporated portions of Santa Barbara County, where the County retains land use permit authority. Thus, the ECAP does not cover the portions of the unincorporated county that are within state and federal lands and waters. These portions of the unincorporated county include the Los Padres National Forest, Vandenberg Air Force Base, the University of California, Santa Barbara, the Chumash reservation, and the offshore oil and gas production facilities in the Santa Barbara Channel. Similarly, the ECAP does not address incorporated areas within Santa Barbara County, which include the Cities of Santa Barbara, Carpinteria, Goleta, Lompoc, Solvang, Buellton, Guadalupe, and Santa Maria.

The ECAP also identifies emissions from stationary sources for informational purposes only. Emissions from stationary sources are unique and will require special attention and collaboration with the Santa Barbara County Air Pollution Control District since the County has limited permit authority. As a result, the updated inventory does not include emissions from stationary sources in the community total or in future reduction goals.

The ECAP's ERMs, combined with the measures identified in the Santa Barbara County SAP and EAP for municipal facilities would collectively provide a reduction in both GHG emissions and energy use in the county. The actions will assist the state in meeting its GHG reduction and energy use goals.

## **5.2 GHG Reduction Target and Emission Reduction Measures**

In order to achieve the community-wide GHG emissions reductions necessary to meet the County's GHG reduction target, a suite of emissions reduction measures have been identified across multiple sectors. The ECAP takes a conservative approach to identifying and quantifying meaningful emission reduction measures which could feasibly be implemented at the county government level. The quantification of each measure also includes conservative assumptions to model realistic implementation of the measures.

The ECAP measures are different than those found in a city climate action plan due to the different options that a county can choose from to implement a climate action plan. Counties require a different approach since they generally have less urban land uses, and have a greater diversity of rural, suburban, and community land uses; can contain multiple energy providers and climate zones; and can have other land uses in their boundaries over which they have no jurisdictional control.

The County's emission reduction strategy is structured around the following ten topic areas:

- |                                     |                                 |
|-------------------------------------|---------------------------------|
| A) Community Choice Aggregation     | F) Renewable Energy             |
| B) Sustainable Communities Strategy | G) Industrial Energy Efficiency |
| C) Land Use Design                  | H) Waste Reduction              |
| D) Transportation                   | I) Agriculture                  |
| E) Built Environment                | J) Water Efficiency             |

Several of these topic areas do not include regulatory measures.

Full implementation of the ECAP can reduce emissions by 15% below baseline 2007 levels by 2020. This equates to achieving reductions of 186,960 metric tons of carbon dioxide equivalents (MTCO<sub>2e</sub>). In addition, there is the potential for an additional reduction of 56,610 MTCO<sub>2e</sub> if a Community Choice Aggregation (CCA) Program was implemented and is successful. Achieving these reductions requires a broad mix of creative and effective measures that meet local priorities. The measures which can achieve the largest GHG emission reductions are shown below in Table 1.

**Table 1: Measures with Largest GHG Emission Reductions**

<b>Measure #</b>	<b>Measure Title</b>	<b>2020 GHG Reductions (MTCO<sub>2</sub>e)</b>
SCS	Sustainable Communities Strategy	-32,410
BE 2	Energy-Efficient Renovations	-24,300
WR 1	Waste Reduction	-19,020
BE 4	Energy Scoring and Audits	-16,790
WR 2	Increased Recycling Opportunities	-16,360

The description of the quantification approach for the measures with the largest GHG emissions reductions follows.

#### SUSTAINABLE COMMUNITIES STRATEGY

Santa Barbara County Association of Governments (SBCAG) developed the Sustainable Communities Strategy (SCS) as a component of the Regional Transportation Plan. The SCS is the outcome of SB 375, which requires the Metropolitan Planning Organizations (MPOs) to tie land use planning with transportation planning in order to reduce GHG emissions from passenger vehicles. In October 2012, the SBCAG Board approved the preferred scenario of transit-oriented development/infill, plus an enhanced transit strategy. The SCS was adopted by SBCAG in August 2013 and accepted by CARB in November 2013. The adopted SCS sets out a plan to meet SBCAG’s goal of a zero net increase per capita in GHG emissions from passenger vehicles by 2020. By fully implementing the SCS in the unincorporated county, the County can take credit for reductions achieved through SCS implementation in the ECAP. Such a commitment would involve upzonings of some properties in the county to allow for increased densities. Rezones of individual parcels would require a separate County BOS approval.

#### BUILT ENVIRONMENT

The built environment goal of the ECAP is to foster development and renovations whose location, design, construction, and systems increase energy efficiency. Energy consumption, both gas and electric, by businesses and homes represents a significant source of GHG emissions in the county. Residents use natural gas to heat water and power natural gas appliances. Commercial enterprises also use natural gas for water heating, cooking, and other activities. Electricity powers appliances that have become essential for daily life – from residential appliances to local infrastructure, such as street lights. Promoting and achieving energy conservation and more efficient use of energy offers one of the most readily achievable and cost-effective means of GHG reduction. Implementation of energy-saving measures will not only reduce GHG emissions, but will also reduce household and business costs associated with energy consumption.

These measures target efficiencies and conservation in electricity and natural gas use in homes and non-residential buildings to reduce emissions. In Santa Barbara County, which is a low growth area, the majority of future GHG emissions will come from existing buildings. For this reason, it is critical that energy-saving measures focus on improving efficiency and conservation

in existing buildings, and ensuring that new construction projects utilize electricity and natural gas as efficiently as possible.

Measure BE 2 (Energy-Efficient Renovations) incentivizes homeowners and commercial and industrial building owners to improve the energy efficiency of existing buildings upon renovation or alteration; this measure also supports and provides resources for tax credits, grants, loans, and other incentives to assist the public, businesses, and the local agencies with the purchase of energy-efficient equipment. By providing incentives to owners who complete energy renovations, the energy efficiency of buildings will improve across the county and, ultimately, contribute to the reduction of GHGs emissions. Measure BE 2 requires energy audits for all building permits valued greater than \$10,000, offers expedited building permit plan check for implementing audit recommendations, and considers providing a rebate for completing the audit or a waiver of building permit fees if upgrades are completed.

Measure BE 4 (Energy Scoring and Audits) improves the energy efficiency of buildings at the time of sale for all residential buildings, and discloses energy use history when nonresidential buildings are leased or sold. Measure BE 4 requires residential property owners to complete or comply with a set of energy-efficiency upgrades to their home at the time of building sale or within a year from the close of escrow. However, properties sold multiple times must only comply once. Requiring such compliance measures for buildings at time of sale ensures that energy efficiency will be improved in a wide range of buildings throughout the county.

## WASTE REDUCTION

The waste reduction goal is to exceed the state's required diversion rate of 75% by achieving a county-wide waste diversion rate of 85% by 2020. Disposing of materials and products at the end of their useful life requires energy and emits GHGs. When waste is sent to the landfill, it decomposes and emits methane gas. Improved waste management at the local jurisdictional level and individual level are both necessary parts of a successful reduction strategy. The increased conservation of resources through reusing and recycling materials results in less demand for raw materials and indirectly results in fewer GHGs generated from future production and transportation of new materials. Additionally, the impact of transporting waste from homes and businesses by waste fleet vehicles can be reduced through increased diversion and cleaner vehicle fleets. This goal seeks to decrease the amount of waste that is being deposited in landfills and to develop energy from the waste which does get landfilled. These measures would be implemented through the Resource Recovery and Waste Management Division (RRWMD) of the County Public Works Department.

Measure WR 1 (Waste Reduction) continues support of programs associated with efficient waste collection and recycling, public school education, and composting. Supporting the RRWMD of will aid in waste reduction.

Measure WR 2 (Increased Recycling Opportunities) seeks additional opportunities for county residents to recycle cardboard, glass, paper, and plastic products. Increasing recycling and expanding the ways in which residents can recycle will aid in waste reduction throughout the county.

Voluntary reduction measures alone cannot achieve a 15% GHG emission reduction. Because of this, the ECAP includes a mix of voluntary, phased, and mandatory emissions reduction measures. Mandatory measures include:

- Energy Efficient Renovations (BE 2)
- Energy Scoring and Audits (BE 4)
- Energy Efficiency and Green Building Standards (BE 8)
- Alternative Energy Development (RE 1)
- Solar Water Heaters (RE 2)

Phased measures include: the SCS, and Energy Upgrade Incentive (IEE 3). Implementation of SCS would require rezones and a Comprehensive Plan amendment to comply with the infill development approach proposed by the SBCAG. Rezones of individual parcels would require board approval.

### **5.3 Programmatic Mitigation Under CEQA**

Neither state nor federal law currently mandates a specific GHG reduction target, and the County has wide latitude to determine a reduction target unique to Santa Barbara County. However, in order to meet the requirements of a “Qualified GHG Reduction Strategy” (explained below) a target must be set to “establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable” (CEQA Guidelines Section 15183.5(b)(1)(B)). AB 32 identified a statewide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020. In 2007, the California Air Resources Board (CARB) completed a statewide GHG emissions inventory. In 2008 CARB issued the AB 32 Scoping Plan, which determined that reducing GHG emissions to 1990 levels would require cutting approximately 30% from business-as-usual emission levels projected for 2020, or about 15% from emission levels in 2008. The AB 32 Scoping Plan outlined how the state would achieve this goal and provided a recommendation for local governments to assist the state in achieving this target through a reduction of 15% below current emissions at the local level.

The First Update to the AB 32 Scoping Plan was approved by the California Air Resources Board (CARB) on May 22, 2014. In order to meet the long-term climate goal of GHG emissions of 80% below 1990 levels by 2050, a mid-term statewide emission limit has been set. Originally, CARB approved a total statewide GHG 1990 and 2020 goal emissions limit of 427 million MTCO<sub>2e</sub> (MMTCO<sub>2e</sub>). This Scoping Plan increased the 1990 and 2020 emissions level to 431 MMTCO<sub>2e</sub>, to more accurately reflect global warming potential of certain greenhouse gases, an increase of slightly less than one percent. The Updated Scoping Plan also revised the estimated 2020 business as usual emissions downward, from 596 MMTCO<sub>2e</sub> to 509 MMTCO<sub>2e</sub> (approximately a 14.6% reduction).

One of the objectives of the proposed project is to adopt an ECAP that satisfies the requirements of Section 15183.5 of the CEQA Guidelines for a Qualified GHG Reduction Strategy, which

provides a process to streamline the review of GHG emissions of specific projects.<sup>3</sup> Under this guideline, lead agencies can use adopted plans consistent with State CEQA Guidelines Section 15183.5(b) to analyze and mitigate the significant effects of GHGs under CEQA at a programmatic level by adopting a plan for the reduction of GHG emissions. Later, as individual projects are proposed, project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review in their cumulative impacts analysis. A key intent of this ECAP is to allow project-specific environmental documents prepared for projects that are consistent with the ECAP to rely on this ECAP's programmatic analysis of GHG. This approach provides streamlined CEQA analysis of future projects that are consistent with the approved ECAP.

The amount of emissions to be reduced through the ECAP is a conservative estimate based on available data, and the reduction measures will continue to be revised as necessary to meet the County's target of 15% below 2007 levels by 2020, as the ECAP is updated. Therefore, the proposed ECAP with modifications to Measure BE 2 and Measure BE 4 as analyzed in Alternative 3 of the proposed Final EIR is consistent with the CEQA Guidelines for a Qualified GHG Reduction Strategy to provide this streamlining benefit. Specifically the ECAP identifies a strategy, reduction measures, and implementation strategies the County will use to achieve the GHG emissions reduction target. This reduction target is consistent with the state's AB 32 goals of achieving 1990 emissions levels by 2020.<sup>4</sup> The technical analysis provided in the ECAP identifies the emissions associated with specific actions and sets forth performance standards and indicators to achieve the specified emissions goals. The implementation actions of the ECAP further demonstrate the County's commitment to monitor ongoing progress to the reduction target.

#### **5.4 ECAP Implementation**

Implementation of the ECAP is an ongoing commitment and will require County leadership to execute these measures and report on the progress of their implementation. The ECAP identifies the responsible department for each measure and offers timeframes and cost estimates for implementing each strategy. Successful implementation requires regular reporting. Staff will monitor the ECAP's implementation progress every five years and report to the Board of Supervisors on the progress made. This implementation tool will support effective monitoring, allowing County staff to track the progress of each ECAP measure in reducing GHG emissions and to assess the effectiveness of each ERM. County staff will also track ECAP measure compliance for development projects.

#### **5.5 Relationship to the Comprehensive Plan**

The ECAP also supports the County's Comprehensive Plan. The ERMs described in the ECAP are consistent with the policy provisions contained in the Comprehensive Plan. Concurrent with the adoption of the ECAP, the County will amend its Comprehensive Plan to reflect the County's

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<sup>3</sup> CEQA (California Environmental Quality Act). 2014. Statutes and Guidelines.

<sup>4</sup> AB 32 Scoping Plan.

intent to reduce GHG emissions that are linked to the County's land use decisions. The Comprehensive Plan amendment amends the Energy Element to include a new Policy 8.3 and Research Action 8.3.1 requiring implementation of the ECAP, with provisions for monitoring and updating at least every five years. Together, these amendments identify a path to integrate ECAP objectives into the County's long-term planning framework. The proposed policy and research actions for the Comprehensive Plan are as follows:

- **Policy 8.3: ECAP Implementation:** The County shall implement the Energy and Climate Action Plan (ECAP) to reduce greenhouse gas (GHG) emissions from community-wide sources by a minimum of 15% from the 2007 baseline emissions by 2020.
- **Research 8.3.1:** Established in the ECAP, the County shall monitor progress towards achieving GHG reductions every five years. Monitoring of the County's ECAP shall include an update to the GHG emissions from community-wide sources. If it is determined that the ECAP is not achieving specified levels of GHG emission reductions, the ECAP will be updated as needed.

## 6.0 ENVIRONMENTAL REVIEW

The County has prepared a Programmatic Environmental Impact Report (EIR) in compliance with the requirements of CEQA Guidelines Section 15183.5(b) for a Qualified GHG Reduction Strategy.

The Draft EIR was released for a 45-day comment period on May 9, 2014 and a public comment hearing was held June 11, 2014 at the County Planning Commission Hearing Room. Public comment was received until the end of the comment period on June 24, 2014.

The Final EIR (Attachment C) has been prepared for the Energy and Climate Action Plan pursuant to CEQA (California Public Resources Code Section 21000, et seq.), State CEQA Guidelines (14 California Code of Regulations, Section 15000, et seq.), and the County of Santa Barbara CEQA Guidelines.

### 6.1 Summary of Environmental Analysis

The Final EIR (14EIR-00000-00003) analysis substantiates findings in Attachment A that the proposed project would not result in any significant and unavoidable impacts (Class I). The project would result in adverse but less than significant impacts (Class III) for the following issue areas:

- Land Use
- Transportation and Circulation
- Aesthetics
- Agricultural Resources
- Biological Resources

- Noise
- Air Quality
- Greenhouse Gas Emissions

## 6.2 Project Alternatives Analysis

The Final EIR (14EIR-00000-00003) prepared for the project evaluated a No Project Alternative, Alternative 2: 20% or More GHG Reduction Alternative (Includes Required Measures, Community Choice Aggregation, and Sustainable Communities Strategy), and Alternative 3: Modification of Measures BE 2 (Energy-Efficient Renovations) and BE 4 Energy Scoring and Audits) as methods of reducing or eliminating potentially significant environmental impacts. The No Project Alternative and Alternative 2 are infeasible or not environmentally superior for the reasons stated:

- **No Project Alternative**

The No Project Alternative assumes the ECAP and corresponding amendment to the Energy Element of the County of Santa Barbara's Comprehensive Plan would not be adopted. The No Project Alternative would result in similar impacts on the following resources relative to the proposed ECAP: Land Use, Transportation and Circulation, Aesthetics, Agricultural Resources, Biological Resources, and Noise.

The No Project Alternative would result in greater impacts on the Air Quality and Greenhouse Gas Emissions. The No Project Alternative would not achieve the ECAP's beneficial impacts on air quality related, in part, to the ECAP's reduction in vehicle miles traveled, energy conservation programs, and support for renewable energy sources. Additionally, it would not establish GHG reduction measures, thus, it would not reduce the amount of GHG emission generated in the county. Therefore, it would not achieve the AB 32 reduction target.

- **Alternative 2: 20% or More GHG Reduction Alternative (Includes Required Measures, Community Choice Aggregation, and Sustainable Communities Strategy)**

Alternative 2 targets a 20 percent or more reduction in GHG emissions from the baseline year by 2020. This option includes all the GHG reduction measures and actions of the proposed ECAP and further strengthens the implementation actions related to the following measures: BE2 – Energy-Efficient Renovations, BE4 – Energy Scoring and Audits, WR1 – Waste Reduction, WR2 – Increased Recycling Opportunities, and WR3 –Construction and Demolition Waste Recycling.

BE 2 would be altered to implement an energy conservation ordinance requiring all residential and nonresidential properties to complete an energy audit and retrofit to reduce energy use by 30% or verify their participation and savings in other energy conservation programs by 2020.

BE 4 would be altered to require all residential properties provide an energy audit at the time of sale. Secondly, all residential property owners would be required to implement recommended energy efficiency measures provided by the energy audit or similar program. Lastly, all nonresidential properties would be required to provide buyers or tenants with the previous year's energy use documented through EnergyStar Portfolio Manager.

WR 1, WR 2, and WR 3 would be altered to establish net zero waste goals. Alternative 2 has all the same impacts to resources as the proposed ECAP but would have slightly greater beneficial impacts related to GHG emissions.

- **Alternative 3: Modification of Measures BE 2 (Energy-Efficient Renovations) and BE 4 Energy Scoring and Audits)**

Alternative 3 consists of implementing the same ECAP as the proposed project, with revisions to the implementation actions of BE2 – Energy-Efficient Renovations and BE4 – Energy Scoring and Audits.

Measure BE 2 would be altered to require energy audits for all building permits valued greater than \$15,000 and offer expedited building permit plan check for implementing audit recommendations, and consider providing rebates for completing the audit or waiver of building permit fees if upgrades were completed. In comparison, the proposed ECAP requires such audits valued at greater than \$10,000.

Approximately 50% of all building permits would be required to complete an energy audit if the Measure BE 2 trigger is set at \$10,000, while 35% would require energy audits if the trigger is set at \$15,000. The \$15,000 trigger would realize fewer GHG reductions (approximately -2,130 MTCO<sub>2e</sub> per year based on a conservative participation rate of 30%).

Measure BE 4 would be altered to require residential property owners to complete energy audits at time of building sale. In comparison, the proposed ECAP requires a prescribed set of energy upgrades to be undertaken at the time of building sale or within one year from close of escrow for all residential buildings, and to disclose energy use history when nonresidential buildings are leased or sold. The upgrades include items such as installing new showerheads, upgrading water heating systems, and replacing common area lighting.

The modifications to Measure BE 4 provide greater flexibility and reduce costs associated with pending transactions, as a result of only requiring property owners to complete an energy audit at the time of building sale. The modification to Measure BE 4 would decrease the estimated GHG savings by approximately 1,780 MTCO<sub>2e</sub>.

Modifications to Measure BE 2 and Measure BE 4 would result in a smaller reduction of GHG emissions than the proposed project. More specifically, the change in Measure BE 2 and Measure BE 4 would achieve a 14.77% reduction from the 2007 baseline based on current GHG emission reduction estimates provided in the ECAP. Alternative 3 would decrease the estimated GHG savings, reducing the overall effectiveness of the ECAP by an estimated 3,900 MTCO<sub>2e</sub> per year. However, the ECAP and proposed changes to the

Comprehensive Plan's Energy Element would commit the County to meeting a 15% reduction. The County will be conducting regular monitoring of community emissions and the implementation of reduction measures, as specified in Chapter VI of the ECAP. If the County determines that emissions are not being reduced as anticipated, the implementation and monitoring protocols in the ECAP will require County staff and decision makers to develop additional reduction measures and to increase implementation of existing strategies to meet the 15% reduction target. For example, the ECAP estimates the benefit to the County of the achievement of the state's Renewables Portfolio Standard (RPS). Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107 and expanded in 2011 under Senate Bill 2, California's Renewables Portfolio Standard (RPS) requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33% of total procurement by 2020. Santa Barbara County is served by two investor owned utilities, Pacific Gas & Electric Company (PG&E) and Southern California Edison (SCE). The analysis in the ECAP relied on reporting documents from the utilities that presented current and projected progress toward the target at the time of preparation of the inventory and forecast. Based on the reports and consistent with the conservative approach to calculations in the ECAP, the ECAP assumed that PG&E and SCE would increase procurement from eligible renewable energy resources to 28% of total procurement by 2020 rather than 33%. Based on current reporting by the utilities, the California Public Utilities Commission, and the California Energy Commission, PG&E and SCE appear to be on track achieve the 33% target by 2020. The progress of PG&E and SCE will be factored into the annual reporting and monitoring of the ECAP and would bring the County closer to meeting the required 15% reduction target than assumed in the current ECAP.

Alternative 3 would also result in a less than significant GHG emission impact similar to the proposed project. Alternative 3 would achieve the ECAP's beneficial impacts on air quality related, in part, to the ECAP's energy conservation programs and support for renewable energy sources. Therefore, it would still achieve all of the project objectives.

- **Environmentally Superior Alternative**

Alternative 2 is the environmentally superior alternative. Alternative 2 would have nearly the same impacts as the proposed project, but would have greater beneficial impacts related to GHG emissions. Alternative 3 would have largely the same impacts as Alternative 2 and the proposed project. Alternative 1 (the no project alternative) would avoid most of the impacts associated with the project and Alternative 2, but it would result in a significant and unmitigable impact related to GHG emissions.

## **7.0 POLICY CONSISTENCY**

The proposed project will not result in any inconsistencies with the adopted policies and development standards of the County's Comprehensive Plan, the Coastal Land Use Plan, and the Montecito Community Plans.

The ECAP is a guide for GHG emissions reductions throughout the County. Policy consistency analysis will be performed on a case-by-case basis for individual development. Projects will not be approved unless they are determined to be consistent with applicable policies, and the findings for approval can be made. Therefore, this amendment may be found consistent with the Comprehensive Plan, the Coastal Land Use Plan, and the Montecito Community Plan.

## **8.0 PROCEDURES**

The Montecito Planning Commission may recommend to the County Planning Commission that the Board of Supervisors adopt, adopt with revisions, or not adopt the proposed Resolution to the Board of Supervisors.

## **9.0 APPEALS PROCEDURES**

Comprehensive Plan amendments recommended for approval or denial are automatically forwarded to the County Planning Commission and final action will be taken by the Board of Supervisors, therefore no appeal is required.

## **10.0 ATTACHMENTS**

- A. Findings for Approval
- B. Draft Energy and Climate Action Plan
- C. Energy and Climate Action Plan Proposed Final EIR
- D. Resolution – Energy Element Amendment
- E. Resolution – ECAP Adoption

**Attachments for the Staff Report for the Montecito Planning Commission Hearing on August 25, 2014 can be found at the following link:**

[http://sbcountyplanning.org/boards/pc/mpc\\_documents\\_archive.cfm?DocID=14463](http://sbcountyplanning.org/boards/pc/mpc_documents_archive.cfm?DocID=14463)

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COUNTY OF SANTA BARBARA  
PLANNING AND DEVELOPMENT  
LONG RANGE PLANNING  
MEMORANDUM

Date: September 9, 2014

To: Montecito Planning Commission

From: Heather Allen, Planner *HA*

Subject: Energy and Climate Action Plan  
September 17, 2014 Montecito Planning Commission Hearing

## 1.0 Introduction

The purpose of this memorandum is to respond to the Montecito Planning Commission's (MPC) request for more information at their August 25, 2014 hearing. The MPC requested information that highlights the mandatory emission reduction measures (measures) and how all measures will be implemented and monitored. The MPC also requested additional information on cost-to-date for the development of the ECAP, the estimated annual costs to the County of Santa Barbara (County) associated with ECAP implementation and monitoring, and if the requirement for monitoring the ECAP's implementation progress every five years could instead be a decision voted on by the Board of Supervisors (Board) at each five year mark. The following sections respond to these requests.

## 2.0 Mandatory Measures

Planning and Development staff provided a briefing to the Board in March of 2013 in which staff identified five options for setting a greenhouse gas (GHG) reduction target. All of the options used the same reduction measures and changed how they are implemented to achieve more or less reductions. The Board voted 3-2 to recommended Option 4 which set a County GHG emission reduction target of 15% below the baseline as well as completing a feasibility study on implementing Community Choice Aggregation. Since voluntary measures alone cannot achieve a 15% reduction, Option 4 provided a balanced approach with voluntary, phased, and mandatory measures to achieve the target and also allow project applicants to rely on the ECAP for programmatic tiering under CEQA. The ability to use the ECAP for CEQA tiering relieves development project applicants of the burden and cost of analyzing impacts on a project by project basis.

Full implementation of the ECAP can reduce emissions by 15% below baseline 2007 levels by 2020. Achieving these reductions requires a broad mix of creative and effective measures that meet local priorities. The largest reductions result from the Sustainable Communities Strategy and Measure BE 2- Energy Efficient Renovations, achieving reductions of 32,410 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) and 22,470 MTCO<sub>2e</sub>, respectively. Measure BE 2 is a mandatory measure; there are four additional mandatory measures in the ECAP.

Appendix D of the ECAP includes a cost-benefit analysis of eleven key measures including all five mandatory measures. The costs listed in the cost-benefit analysis assume no grants or incentives are available to the County or to participants to offset the costs identified. While grant programs and incentives vary from year to year, potential grants or incentives that help defray the costs of implementing energy efficiency measures are included in Appendix D. All five mandatory measures are described below including estimated cost to the County and per participant over a six year period.

**BE 2: Energy-Efficient Renovations** - Incentivizes homeowners and commercial and industrial building owners to improve the energy efficiency of existing buildings upon renovation or alteration. The measure supports and provides resources for tax credits, grants, loans, and other incentives to assist the public, businesses, and the local agencies with the purchase of energy-efficient equipment. By providing incentives to owners who complete energy renovations, the energy efficiency of buildings will improve across the county and, ultimately, contribute to the reduction of GHGs emissions.

Staff's recommended changes to Measure BE 2 Action 2 would require energy audits for all building permits valued greater than \$15,000 (as opposed to \$10,000), offers expedited building permit plan check for implementing audit recommendations, and considers providing a rebate for completing the audit or a waiver of building permit fees if upgrades are completed. The originally proposed Measure BE 2 Action 2 has a total cost to the County of \$25,000 and a cost per participant of \$600. Costs to the County include staff time to develop an ordinance. Costs to the participant includes the added costs of conducting an audit (approximately \$500) and the increased permit fee for staff time to review audits/permits, but does not require implementing audit recommendations. With staff's recommended change to Measure BE 2 Action 2, the costs to the County and to the participants would remain the same; however, there likely would be fewer participants who actually implement audit recommendations.

**BE 4: Energy Scoring and Audits** - Improves the energy efficiency of buildings at the time of sale for all residential buildings, and discloses energy use history when nonresidential buildings are leased or sold. Staff's recommended changes to Measure BE 4 Action 1 would only require residential property owners to complete energy audits at time of building sale. In comparison, the originally proposed measure requires a prescribed set of energy upgrades to be undertaken at the time of building sale or within one year from close of escrow for all residential buildings. Measures like BE 4 have a significant impact on the community-wide GHG reductions because new construction is required to meet California Green Building Standards Code (Title 24, Part 6); however, there is limited new construction in southern Santa Barbara County. The County does contain a lot of existing housing that may not be energy efficient and/or water efficient. Requiring energy audits for residential buildings at time of sale ensures that energy efficiency

will be improved in a wide range of buildings throughout the County, especially the County's older housing stock.

The originally proposed Measure BE 4 Action 1 has a total costs to the County of \$100,000 and a cost per participant of \$3,560. County costs include staff time to draft the ordinance, initial staffing costs to develop and distribute outreach materials, and to assist residents and businesses with implementation of the energy-efficiency compliance items. The participant cost includes the added costs of equipment replacement which comprises equipment cost and installation. Staff's recommended changes to Measure BE 4 Action 1 may slightly reduce the cost to the County and would reduce the cost to the participant. The new costs to the participant with staff's recommended modifications would be \$600 and includes the costs of conducting an audit (approximately \$500) and the increased permit fee for staff time to review audits/permits, but does not require implementing audit recommendations.

**BE 8: Energy Efficiency and Green Building Standards** - Implements energy efficiency and green building practices for developments requiring building permits to exceed the California Green and Building Code (Title 24) standards. BE 8 Action 3 requires all building permits subject to Title 24 standards to exceed the Title 24, Part 6 by 15% and earn 25 points for residential buildings or 15 points for nonresidential buildings from the County's green building program (Smart Build Santa Barbara) checklist.

Measure BE 8 Action 3 has a total cost to the County of \$50,000 and a cost per participant of \$2,100. The costs to the County include staff time to develop the program. Participant costs are estimated at approximately \$2,000 to comply with the action and an increase in permit fees to cover staff time to enforce compliance.

**RE 1: Alternative Energy Development** - Increases the use of alternative energy technology in new & existing development. Measure RE 1 Action 7 requires new buildings to install renewable energy systems or be built "renewable energy-ready." Measure RE 1 Action 7 requirements for new buildings to be built "renewable energy ready" is already a condition of the California Green Building Standards Code (CALGreen); therefore, there are no new costs to single-family residential projects, multi-family projects under four units, and commercial projects less than 10,000 square feet associated with this item.

**RE 2: Solar Water Heaters** - Increases the replacement of existing water heaters with solar water heaters. Measure RE 2 Action 1 requires new residential development and encourages existing development to participate in the state's CSI-Thermal program.

Measure RE 2 Action 1 has a total costs to the County of \$12,000 and a cost per participant of \$6,900. A nominal amount of staff time would be required on an annual basis to disseminate utility prepared materials. Cost per participant is estimated based on 25 homes that have installed solar thermal heaters to date in Santa Barbara County through the CSI initiative. Average costs per system for a single-family home, without incentives or consideration of utility savings, is \$8,700. Incentives through the program have averaged approximately \$1,800 per system, bringing total participant costs down to approximately \$6,900.

### **3.0 Implementation and Monitoring**

Chapter VI of the ECAP includes an implementation program comprising a set of implementation measures and a set of implementation tools. The ECAP implementation tools are technical analyses and tools completed as part of the ECAP planning process, including: a focused cost-benefit assessment of specific GHG reduction measures and a feasibility tool to assess all measures; an Excel-based ECAP monitoring and reporting tool; an ECAP consistency checklist; and a Reduction Measure Implementation Matrix. The County will need to track ECAP implementation to confirm if proposed reduction measures are successfully reducing emissions as estimated and planned, and to allow for potential reevaluation of the reduction measures as may be needed. These monitoring procedures are consistent with the requirements identified in the State CEQA Guidelines Section 15183.5(b) for a Qualified GHG Reduction Strategy.

The cost-benefit and feasibility tool was developed to assist the County with measure prioritization efforts. This tool uses an evaluation framework with three categories: 1) benefits, 2) costs, and 3) implementation considerations. The tool is set up to weigh each category with equal consideration, although the County may adjust the weighing as desired. County staff will use the ECAP consistency checklist to identify applicable ECAP measures when reviewing ministerial and discretionary projects. This checklist will help County staff identify required mitigation standards for new projects. The checklist will also help project applicants understand additional voluntary measures that can support Santa Barbara County's sustainability goals. The checklist will serve as the summary of project-level standards from the ECAP, acting as a "one-stop shop" for the County for GHG analysis and mitigation under CEQA. The checklist will help ensure appropriate use of the ECAP under CEQA by identifying voluntary and mandatory measures to integrate into the project design or other standards. This ensures that new development will benefit from CEQA streamlining provisions while also assisting the County to implement the measures in the ECAP and achieve its GHG reduction goal. An Excel-based monitoring tool has been developed to support effective monitoring and implementation of the ECAP. This tool can be used to collect data, track GHG emissions, and assess the effectiveness of the ECAP measures. Lastly, the ECAP's implementation matrix (Table 6-2) presents key criteria to guide County staff as they prioritize and program ECAP measures to achieve GHG reductions.

### **4.0 Implementation Cost**

County departments will play various roles monitoring and implementing the implementation measures and emission reduction measures discussed in the ECAP. Table 6-2 in the ECAP identifies the departments that may be responsible for implementing each emission reduction measure. Table 6-2 also identifies the performance targets total costs to the County and community as well as savings to the community, and time frame for each measure. Costs to implement the measures in Table 6-2 include all start-up expenses including the purchase of new equipment or material, installation, and any costs to keep the measure in operation such as

associated staffing costs. Savings that occur from the measure due to lower resource use resulting in lower bills are provided for the community.

For the eleven measures which received a more detailed cost-benefit analysis, the implementation matrix presents the specific costs and savings as identified by the analysis in parentheses. Cost and savings estimates, both ranges and specific values, are based on case studies and assumptions. They may not reflect future conditions or the actual details associated with the County's method of implementing the measure. The costs and savings are provided for planning and prioritization purposes only. All costs and savings will be analyzed in greater detail based on community priorities, local goals, and the availability of technical innovations necessary to support the measure. Once established as a priority, detailed costs and savings for measures or program implementation will be included in annual work plans and budgets presented to the Board of Supervisors.

## **5.0 Require Board Authorization for Future Updates**

Several MPC commissioners expressed concerns about annual cost for ECAP implementation and monitoring and suggested that future updates to the ECAP occur only after Board consideration and authorization. Effective ECAP implementation will inherently involve an annual commitment of both County staff and resources to achieve the 15% GHG reduction target. This includes funding for development of ordinances and programs to implement priority measures; ongoing project and building/development permit monitoring to assess the effectiveness of voluntary, phased and mandatory measures; pursuing state and federal funding sources to establish incentives and funding for implementing ECAP programs; and funding sources for a more comprehensive five year update of the ECAP which includes an updated GHG forecast and recommended revisions to measures to achieve the adopted target. ECAP programs and priorities will be presented to the Board for future funding through the P&D annual work program and budget.

The Board could decide against ECAP implementation and monitoring; however, many of the measures would become ineffective and the County would be at risk of not reaching its adopted reduction target. This would result in the County potentially losing the ability for CEQA tiering. Per CEQA Guidelines §15183.5, local governments may use adopted plans consistent with the CEQA Guidelines to assess the cumulative impacts of projects on climate change, if the adopted plan includes a certified EIR. In order to benefit from the streamlining provisions discussed in this section of the legislation, a plan for the reduction of GHG emissions must establish a mechanism to monitor the plan's progress toward achieving the target analyzed during environmental review and to require an amendment if the plan is not achieving the specific target.

Implementation of the ECAP and monitoring its progress towards meeting the reduction target satisfies the requirements of Section 15183.5 of the CEQA Guidelines for a Qualified GHG Reduction Strategy<sup>1</sup> and would allow CEQA tiering.

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<sup>1</sup> CEQA (California Environmental Quality Act). 2014. Statutes and Guidelines.

## **6.0 Climate Action Strategy Costs**

Lastly, the MPC requested information on the cost-to-date budget for the Climate Action Strategy. The cost-to-date for the Climate Action Strategy includes costs for the Climate Action Study (Phase I) and the ECAP (Phase II) from Fiscal Year 2009/10 until the present Fiscal Year (FY 2014/15). The cost-to-date is summarized below:

- Total costs-to-date: \$742,940.
- SCE and PG&E grant funding for development of the ECAP: \$333,027.
- General Fund contribution: \$409,913.

**Attachments for the Staff Memorandum (Staff Memorandum dated September 9, 2014) for the Montecito Planning Commission Hearing on September 17, 2014 can be found at the following link:**

[http://sbcountyplanning.org/boards/pc/mpc\\_documents\\_archive.cfm?DocID=14635](http://sbcountyplanning.org/boards/pc/mpc_documents_archive.cfm?DocID=14635)

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