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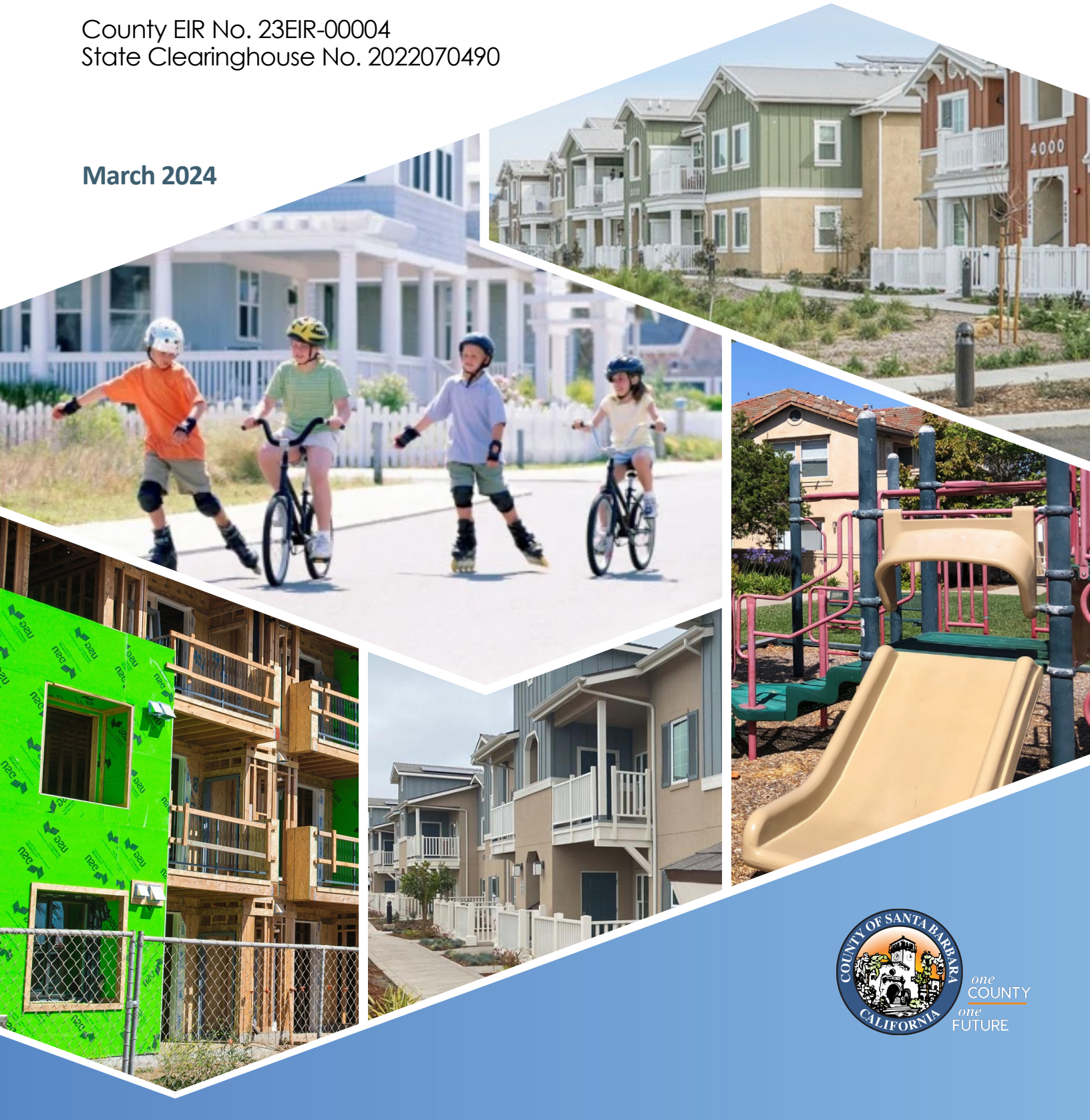
Program Environmental Impact Report (EIR) for the

2023-2031 Housing Element Update

County of Santa Barbara

County EIR No. 23EIR-00004
State Clearinghouse No. 2022070490

March 2024



one COUNTY one FUTURE

COUNTY EIR NO. 23EIR-00004

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2023-2031 HOUSING ELEMENT UPDATE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

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ES-1 Introduction

The County of Santa Barbara (County) is proposing to implement the 2023-2031 Housing Element Update (Project; Housing Element Update). The County's Housing Element is a mandatory component of the County's Comprehensive Plan (i.e., general plan). The Housing Element serves as a long-range planning document that guides future development in the unincorporated areas of the county (Government Code Section 65302). The County of Santa Barbara Planning and Development Department (P&D), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Program Environmental Impact Report (EIR) in accordance with CEQA, Public Resources Code (PRC) Sections 21000 et seq., the CEQA Guidelines, California Code of Regulations (CCR), Title 14, Sections 15000 et seq., and the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970*.

This Program EIR is an informational document that may be used by the public and governmental agencies to review and consider the environmental effects of the proposed Project as part of its decision-making process (Chapter 2, *Project Description* provides a summary of the Housing Element Update and Section 3.0.3, *Impact Assessment Methodology* provides additional discussion regarding the Key CEQA Principles Guiding the Program EIR Analysis.). The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the proposed Project and its alternatives. The complete Program EIR should be consulted for specific information about the environmental effects and the implementation of required mitigation measures, consistent with CEQA.

As a Program EIR, the level of detail included in the project description and methodology for impact analysis is relatively more general than a project-level EIR, rendering some analyses too speculative for detailed evaluation. Further, this Program EIR does not focus on any specific projects that may be implemented pursuant to the Housing Element Update. Instead, the analysis is informed by the sites inventory prepared by the County to estimate the total potential housing that may be enabled under the proposed Project, including the potential rezoning program, during the 2023-2031 planning period. This approach allows the County Board of Supervisors to consider broad implications and impacts associated with the implementation of the Housing Element Update while not requiring a detailed evaluation of individual properties. This Program EIR may be incorporated by reference in subsequent CEQA review documents to describe regional influences, secondary effects, cumulative impacts, and other broad factors that apply to the proposed Project as a whole.

ES-2 Project Overview

The Housing Element Update serves as the guiding document for how the County will address its housing needs and help alleviate the statewide housing crisis. The Housing Element Update provides an ambitious housing plan to achieve the 6th Cycle Regional Housing Needs Allocation (RHNA) targets for the North County and the South Coast RHNA subregions for both the total number of additional units and the affordability mix needed to serve unincorporated areas in the county through 2031, consistent with applicable state housing laws. To do so, the proposed Project comprises the following main components, as described further below.

- Housing Goals, Policies, and Programs
- Housing Sites Inventory with Potential Rezone Program included as a part of Program 1

To prepare the proposed Project, the County updated the 2015-2023 Housing Element by: 1) deleting completed goals, policies, and programs; and 2) as necessary, amending outdated and/or adding new goals, policies, and programs. These updates address public input, new state laws, and current and projected housing needs identified by a current housing needs assessment and constraints analysis. The proposed Project addresses and includes provisions to comport with significant changes to state housing element law implemented in the last few years that prioritize housing production in a manner that affirmatively furthers fair housing. In particular, the proposed Project includes programs and actions that meet the provisions of Assembly Bill (AB) 1397 (Adequate Sites) and AB 686 (Affirmatively Furthering Fair Housing [AFFH]), including a comprehensive sites inventory and programs to ensure the provision of fair housing. The proposed Project meets and exceeds the stringent requirements of AB 1397 to ensure that selected housing sites qualify for inclusion in the RHNA, and AB 686 through the inclusion of a robust fair housing assessment and provision of meaningful actions to address fair housing issues.

As presented in Section ES-3, *Summary of Project Objectives*, the Housing Element Update has six goals. These goals would be implemented during the 8-year planning period (2023-2031) through the Housing Element Update's policies and programs to enable the production of housing at targeted affordability levels to meet the RHNA plus a 15 percent buffer for lower- and moderate- income households and further provision of fair housing. The proposed Project includes 25 programs that would help the County achieve its housing goals, including analysis of potential housing sites and options for needed rezones (Program 1), provisions for use by right (i.e., ministerial) housing projects (Program 2), revisions to the County's Inclusionary Housing Ordinance (IHO) (Program 4), and local implementation of State Density Bonus Law (SDBL) (Program 13). In total, this updated policy framework effectively addresses the housing needs of all economic segments of the unincorporated population in Santa Barbara County.

As part of the Housing Element Update, Government Code Section 65583(a)(3) requires the County to prepare an inventory of land suitable and available for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. This inventory, known as the sites inventory, is used to demonstrate that there is sufficient land at appropriate densities and development standards to accommodate the County's RHNA at the income levels specified within the planning period.

The sites inventory is intended as a planning tool to determine if the County has sufficient adequately zoned land (sites) to accommodate its RHNA. It is not a prediction or guarantee of future development. The inclusion of a site in the sites inventory does not obligate or commit a property owner to develop the site for housing. For this Program EIR, the sites inventory is used as an approximation of where and how environmental impacts associated with residential development could occur

As described further below and in Section 3.0, *Introduction to the Environmental Impact Analysis*, the sites inventory informs the Program EIR's analysis to indicate where, how, and to what degree housing development could occur in the county during the 2023-2031 planning period. For California Department of Housing and Community Development (State HCD) review, the buildout estimate must account for the requirements of state law, which sets forth conservative assumptions for how to calculate a "realistic capacity" of the sites inventory to meet the County's RHNA, which would be a minimum capacity scenario (Tables 2-5 and 2-6). In addition, the potential rezone sites have been

identified for minimum/maximum densities (e.g., 30/40 dwelling units per acre [du/ac]), leading to two levels of overall projected growth under the proposed Project. That is, applying minimum and maximum densities generates two different buildout projections.

To support a reasonable worst-case analysis of potential impacts, this Program EIR evaluates the proposed Project as a whole and considers the maximum potential buildout capacity scenario of the sites inventory, including all potential land use and zoning amendments identified in the Housing Element Update's programs and its sites inventory. Specifically, the Program EIR analyzes the potential buildout of the County's sites inventory considering the County's existing zoning regulations, proposed zoning changes, and potential density bonuses afforded for housing projects qualifying for the SDBL. As a result, the maximum potential buildout scenario estimates that substantially more housing could be developed under the proposed Project than estimated in the Housing Element Update's sites inventory. The maximum potential buildout scenario estimated for this Program EIR is a theoretical assessment of zoning capacity and does not modify or replace the Housing Element Update's assessment of realistic capacity provided in the sites inventory.

Based on the sites inventory, including housing projects that may occur under existing zoning as well as all potential rezones and potential County-owned sites, the proposed Project would have the capacity to accommodate up to an additional 34,558 housing units, including 18,042 units on the South Coast and 16,516 units in North County. The County identified substantially more sites than necessary in the Housing Element Update to provide the opportunity for public feedback and decision-maker choice in selecting sites. As part of the proposed Project, the Board of Supervisors will select a sufficient number of housing sites necessary to accommodate RHNA plus a 15 percent buffer for lower- and moderate-income households leaving surplus sites that will not be rezoned. Thus, the true potential buildout of the housing units across the county will be reduced.

This Program EIR evaluates the proposed Project as a whole. That is, the potential impacts associated with future housing development enabled under the Housing Element Update are analyzed based on information available to the County where reasonably foreseeable, direct, and indirect physical changes in the environment could occur programmatically. The Program EIR, therefore, identifies the candidate housing sites as part of the proposed Project's rezoning program at a programmatic level. The proposed Project's rezoning program includes areas that may result in changes to the environment that were not already considered in previous environmental analyses or studies. Additional housing sites in locations dispersed throughout the county may also be considered for future development. However, further analysis was not conducted because the County had no further information, and other potential sites or areas countywide are considered speculative at this time.

ES-3 Summary of Project Objectives

The Housing Element Update includes six goals that were developed based on public input and in recognition of the County's core community values, as follows:

1. Enhance the affordability, diversity, quantity, and quality of the housing supply and promote livable communities.
2. Promote, encourage, and facilitate housing for special needs groups.
3. Affirmatively further fair housing.

4. Preserve the affordable housing stock and cultivate financial resources for the provision of affordable housing in Santa Barbara County.
5. Foster cooperative relationships and efficient government.
6. Promote homeownership and/or the continued availability of affordable housing units through programs and implementing ordinances for all economic segments of the population, including extremely low-, very low-, low-, moderate-, and/or upper moderate-income households to assure that existing and projected needs for affordable housing are accommodated in residential development with preference given to people who live and/or work within Santa Barbara County.

The Program EIR recognizes these goals and builds upon them to provide Project Objectives that address key housing planning issues as well as related environmental impacts. These objectives help guide the development of project alternatives and may set forth the basis for preparing findings and a statement of overriding considerations if necessary (CEQA Guidelines Section 15124). The Program EIR's Project objectives include the following:

1. Rezone sites to accommodate the County's state-mandated 6th Cycle RHNA (5,644 units) plus a 15 percent buffer for the lower- and moderate-income categories (576 units), which total 6,240 units.
2. Promote housing development on infill sites and maximize housing capacity by rezoning at higher densities to facilitate multifamily housing to accommodate housing for lower- and moderate-income households.
3. Promote a jobs-to-housing balance countywide by facilitating the development of sufficient and affordable housing in close proximity to job centers and essential community services.
4. Encourage diverse housing types that meet the requirements of special needs households.
5. Promote equal housing opportunities and locational choices for all persons in all housing types.
6. Promote and support fair housing choice and fair housing public outreach programs.
7. Collaborate with developers to improve and conserve affordable housing units and provide gap financing for affordable units.
8. Reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.
9. Prioritize housing for people who live and/or work within Santa Barbara County.
10. Ensure new housing sites have adequate infrastructure and do not face significant environmental constraints.

ES-4 Notice of Preparation

The CEQA Guidelines require circulation of a Notice of Preparation (NOP) for a minimum 30-day review period. The County issued an NOP on July 21, 2022, and a revised NOP on August 11, 2022, to request comments on the scope of the Program EIR. The NOP was published online and circulated to

relevant agencies, community organizations, and interested individuals. The NOP was also posted in the County Clerk's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Planning and Research (OPR) to solicit statewide agency participation in determining the scope of the Program EIR. A virtual public scoping meeting was held via Zoom on August 25, 2022. The 30-day public comment period closed on September 9, 2022. Appendix A contains the NOP and comments and input received during the review period which was considered in preparing the scope of this Program EIR (CEQA Guidelines Section 15082).

ES-5 Scope of the Environmental Impact Report

This Program EIR assesses the potential environmental impacts that could occur with implementation of the proposed Project. The Program EIR evaluates potentially significant environmental impacts including issues raised in public comments received in response to the NOPs published on July 21, 2022 and August 11, 2022 and at public workshops/hearings. This scoping process determined that the Program EIR should analyze the following issues:

- Aesthetics and Visual Resources
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Utilities and Water Supply
- Wildfire

This Program EIR addresses the issues referenced above and identifies potential environmental impacts associated with the proposed Project, in accordance with the provisions of CEQA, the CEQA Guidelines, and the County's *Environmental Thresholds and Guidelines Manual* (2021). The Program EIR recommends feasible mitigation measures where necessary that would reduce or eliminate adverse environmental effects. Where appropriate, the Program EIR also discusses where and why mitigation would be infeasible to reduce potentially significant impacts of the proposed Project. In accordance with CEQA Guidelines Section 15128 (Effect Not Found to Be Significant), environmental impacts related to Forestry, Geology and Soils, and Mineral Resources would be insignificant; therefore, these resources are addressed in Chapter 5, *Other CEQA Considerations*.

This Program EIR examines potential direct, indirect, secondary, cumulative, and residual impacts of the proposed Project. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the proposed Project is implemented. The significance of each identified impact was determined using the County's *Environmental Thresholds and Guidelines Manual* (2021) informed by the CEQA Guidelines. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:

- *Significant and Unavoidable Impacts:* Potentially significant impacts that cannot be feasibly mitigated or avoided. No measures could be taken to avoid or reduce these adverse effects to insignificant levels. Even after application of feasible mitigation measures, the residual impact would be significant. If the proposed Project is approved with significant and unavoidable impacts, decision-makers must adopt a Statement of Overriding Considerations (SOC) pursuant to CEQA Guidelines Section 15093 explaining why benefits of the proposed Project outweigh the potential damage caused by these significant unavoidable impacts.
- *Significant but Mitigable Impacts:* Potentially significant adverse impacts that can be feasibly mitigated or avoided. If the proposed Project is approved with significant but mitigable impacts, decision-makers are required to make findings pursuant to CEQA Guidelines Section 15091, stating that impacts have been mitigated to the maximum extent feasible and the residual impact would not be significant.
- *Insignificant Impacts:* These adverse but insignificant impacts do not require mitigation, and they do not require findings to be made. Mitigation measures may still be recommended to improve consistency with policies in the County's Comprehensive Plan.
- *No Impacts:* No adverse changes in the environment would result from implementation of the proposed Project.
- *Beneficial Impacts:* Implementation of the proposed Project would result in impacts that would be beneficial to the environment.

Consistent with the requirements of CEQA Guidelines Section 15130 the Program EIR describes cumulative impacts that could occur from the combined effect of other past, present, and reasonably foreseeable future projects.

Consistent with CEQA Guidelines Section 15126.6(d), the Program EIR also assesses a reasonable range of alternatives to the proposed Project, including alternatives that could feasibly attain most of the basic objectives while avoiding or substantially lessening one or more of the significant effects of the proposed Project. These alternatives include the No Project Alternative, Sustainable Communities Strategy Alternative, Reduced Project A, Reduced Project B, and Reduced Project C alternatives.

ES-6 Notice of Completion / Notice of Availability

The County prepared and filed a Notice of Completion (NOC) for the Draft Program EIR with the Office of Planning and Research on December 20, 2023. In addition, the County prepared and distributed a Notice of Availability (NOA) for the Draft Program EIR to relevant agencies and interested parties within the County on December 20, 2023. The NOC and NOA provide notice of a 52-day public review and comment period for the Draft Program EIR, from **December 20, 2023** to **February 9, 2024**, and the Draft Program EIR is made available on the County's Housing Element Update website: https://www.countyofsb.org/3177/Housing-Element-Update and at both the County P&D office locations (CEQA Guidelines Sections 15087).

ES-7 Summary of Project Impacts

Table ES-3 presents a summary of the impacts, mitigation measures, and residual impacts from the implementation of the proposed Project. Based on the analysis provided in this Program EIR, the proposed Project would result in significant and unavoidable impacts related to aesthetics and visual resources, agricultural resources, air quality, biological resources, hydrology and water quality, land use and planning, population and housing, public services and recreation, transportation, utilities and water supply, and wildfire. The proposed Project would also result in substantial contributions to cumulatively significant impacts to these resource areas.

Aesthetics and Visual Resources. The proposed Project could result in adverse effects on public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways. Development of properties with higher-density housing projects on sites that are visible from public vistas and State Scenic Highways could substantially change and/or obstruct existing public views and degrade the visual resource value of those views. The proposed Project could degrade the existing visual character or quality of public views of a site and its surroundings in the rural area or potentially conflict with applicable zoning and other regulations governing scenic quality in the Urban Area.

Agricultural Resources. The proposed Project could potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural uses. Additionally, the proposed Project could potentially rezone existing agriculturally zoned lands to non-agricultural uses, including rural agricultural land adjacent to Urban Areas as well as urban agricultural areas such as the South Patterson Agricultural Area and the San Marcos Agricultural Area within the Eastern Goleta Valley Community Planning Area.

Air Quality. The proposed Project could potentially violate an air quality standard or substantially contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which Santa Barbara County is in nonattainment. Based on the air emissions modeling results for the proposed Project, the increase in emissions for nitrogen oxides (NO_x), reactive organic compounds (ROCs), and particulate matter (PM_{10}) resulting from the operation of the proposed Project could substantially exceed the adopted operational significance thresholds for all emissions, as well as mobile-source-specific emissions. The primary contributors to the exceedance of adopted thresholds include area-source emissions (e.g., those generated from the use of consumer products and re-application of architectural coatings) and mobile-source emissions associated with the substantial increases in daily vehicle trips associated with the proposed Project.

Biological Resources. The proposed Project could impact environmentally sensitive habitat (ESH), riparian corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities, particularly within the unincorporated areas of Eastern Goleta Valley, Orcutt, Mission Hills, Vandenberg Village, and Santa Ynez Valley. The proposed Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Although site-specific impacts cannot be determined due to the programmatic nature of this analysis, future residential and mixed use development could require substantial site alteration and grading that would create potential impacts on sites supporting or bordering habitat for such species. The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. For example, the development of housing

on sites that are currently undeveloped could result in habitat fragmentation and the creation of barriers (e.g., fences or walls).

Hydrology and Water Quality. The proposed Project could substantially degrade groundwater quality, interfere substantially with groundwater recharge, or impede sustainable groundwater management of local groundwater basins. The proposed Project would not conflict with or obstruct the implementation of a water quality control plan. However, future residential and mixed use development enabled by the Housing Element Update could overlap the Cuyama Valley, San Antonio Creek Valley, and Santa Ynez River Valley basins, which are all medium or high-priority basins and as such, have adopted groundwater sustainability plans (GSPs) governing the sustainable management of their respective groundwater resources. Future development enabled under the Housing Element Update would exceed the growth projections used to inform the management of groundwater supplies for domestic use. As such, new residential and mixed use development in these areas would potentially conflict with the GSPs and obstruct the management actions and sustainability strategies for these basins.

Land Use and Planning. The proposed Project could result in physical effects that potentially conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Population and Housing. The substantial increase in future housing units enabled under the Housing Element Update and, consequently, the additional population that could result from the proposed Project create the potential for substantial population growth that would exceed current population projections, including the Santa Barbara County Association of Governments (SBCAG) Connected 2050 Regional Transportation Plan/Sustainable Community Strategy (Connected 2050 RTP/SCS) and its regional growth forecasts.

Public Services and Recreation. The proposed Project could result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. Additionally, the proposed Project could increase the use of existing parks and recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or could require the construction or expansion of recreational facilities which might have an adverse impact on the environment.

Transportation. The proposed Project could result in potentially significant increases in total vehicle miles traveled (VMT) per service population within the county. Under the proposed Project, Total VMT per Service Population would exceed the County's VMT impact threshold on a countywide basis and in each of the four North County Housing Market Areas (HMAs): Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley.

Utilities and Water Supply. The proposed Project would require the construction, expansion, or replacement of utilities, including water and wastewater facilities, which could potentially result in significant environmental effects. Potential development resulting from the proposed Project would generate additional water demand that could exceed the available water supply of the Goleta Water District and Cuyama Community Services District (CSD), resulting in a lack of reliable water supplies to meet the future demands of the residential and mixed use development enabled under the proposed Project. Potential development resulting from the proposed Project would generate additional wastewater that could exceed the capacity of the Goleta Sanitary District, Goleta West Sanitary District, Los Alamos CSD, Laguna County Sanitation District, and Cuyama CSD. While future development would be subject to existing laws, regulations, plans, and policies to reduce the amount of solid waste generated and disposed of in regional landfills, potential development resulting from

the proposed Project would generate additional municipal solid waste that could exceed the County's adopted thresholds and potentially result in the exceedance of the disposal capacity of regional landfills, or result in the need for future expansion or expedited closure of a landfill.

Wildfire. The proposed Project could exacerbate wildfire risks and could expose existing or future residents to pollutant concentrations resulting from the uncontrolled spread of wildfire at several sites throughout the county, particularly along the wildland-urban interface (WUI) on the south-facing slopes of the Santa Ynez Mountains on the South Coast.

ES-8 Alternatives Considered and Analyzed

Pursuant to CEQA Guidelines Section 15126.6 the County considered several alternatives to the proposed Project through the screening process. The purpose of considering and analyzing alternatives under CEQA is to identify other means to attain the Project Objectives while avoiding or substantially reducing potentially significant environmental impacts caused by adopting the proposed Project. Alternatives selected for analysis are summarized in Table ES-1, including the No Project alternative as required by CEQA.

Table ES-1. Alternatives Considered and Analyzed

Alternative	Key Details/Description
No Project Alternative	• No implementation of programs of the Housing Element Update, including but not limited to: o Revisions to development standards for residential and mixed use development o Use-by-right and ministerial approval of new housing projects o Revised Density Bonus Provisions o Amendments to the County's IHO o Support for expansion of water and wastewater services for new housing projects o Support for recreation planning to support the demands of new residential development • Continued allowance of accessory dwelling units (ADUs) under existing zoning regulations • No rezoning of sites identified under Program 1 of the Housing Element Update (Potential Rezone Program) • No future development of the nine potential County-owned sites • Continued buildout of existing vacant sites under current zoning regulations, including vacant sites included in the Potential Rezone Program • Continued buildout of 18 pending cumulative projects
Alternative 2 – Sustainable Communities Strategy	• Relocate housing capacity from areas that are underserved by transit and other public services to areas that are within Transit Priority Areas (TPAs) and/or High Quality Transit Corridors (HQTCs) or in VMT-efficient areas while achieving the RHNA for South Coast and North County. This would involve: o Revisions to the sites inventory in the South Coast to include only those potential rezone sites with all or a portion of the site located within the HQTC in the South Coast, as mapped by SBCAG.

Table ES-1. Alternatives Considered and Analyzed (Continued)

Alternative	Key Details/Description
	○ Revisions to the sites inventory in the North County to include only those potential rezone sites located in the Santa Maria Valley. ▪ Specific sites that would be eliminated would include Rezone Site Nos. 11 (Glen Annie), 12 (St. Vincent's – East), 13 (St. Vincent's – West), 15 (Van Wingerden 1), 16 (Van Wingerden 2), 32 (Fong 1), 33 (Fong 2), 34 (Alexander 1), 35 (Chumash LLC), and 36 (Blue Sky Property). The housing capacity of those potential rezone sites would be relocated to areas within the HQTC on the South Coast or the community of Orcutt within Santa Maria Valley. ○ To make up for the difference and accommodate the full RHNA plus 15 percent buffer, the housing capacity associated with these eliminated sites would be reallocated and balanced within the unincorporated communities in the South Coast and Santa Maria Valley (i.e., Eastern Goleta Valley and Orcutt), which are VMT-efficient regions of the county. • Implement all other elements of the proposed Project
Alternative 3 – Reduced Project A	• Remove the following sites from the Potential Rezone Program, and retain existing zoning for those sites: ○ Rezone Site Nos. 2 (St. Athanasius Church), 3 (Scott), 4 (Ekwill), 5 (Caird 1), 6 (Caird 2), 7 (Caird 3), 24 (Key Site 26), 26 (North Point HOA), and 27 (Boys and Girls Club) • Implement all other elements of the proposed Project
Alternative 4 – Reduced Project B	• Remove the following sites from the Potential Rezone Program, and retain existing zoning for those sites: ○ Rezone Site Nos. 2 (St. Athanasius Church), 3 (Scott), 4 (Ekwill), 11 (Glen Annie), 19 (Key Site 1), and 23 (Key Site 16) • Modify the Potential Rezone Program to change the proposed rezoning of sites as follows: ○ Rezone Site No. 24 (Key Site 26) to C-2 and DR-20/30 (previously proposed to rezone to C-2 and DR-30/40 under proposed Project) • Implement all other elements of the proposed Project
Alternative 5 – Reduced Project C	• Remove the following sites from the Potential Rezone Program, and retain existing zoning for those sites: ○ Rezone Site Nos. 1 (Giorgi), 10 (McCloskey Lelande), 17 (Montessori), 21 (Key Site 10), and 22 (Key Site 11) • Modify the Potential Rezone Program to change the proposed rezoning of sites as follows: ○ Rezone Site No. 23 (Key Site 16) to DR-20/30 (previously proposed to rezone to DR-30/40 under proposed Project) • Implement all other elements of the proposed Project

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the Program EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment. Table ES-2 summarizes the environmental impact findings for each alternative analyzed relative to the proposed Project. This assessment considers the overall advantages and disadvantages associated with the analyzed alternatives relative to the Housing Element Update. In evaluating alternatives under CEQA, different weights may be assigned to the relative importance of specific environmental impacts. In comparing the alternatives to the proposed Project, "more weight" was given to agricultural resources, biological resources, GHGs, hazards and hazardous materials (i.e., airport safety), land use and planning, noise, transportation, utilities and water supply, and wildfire hazards than to other resource area impacts, primarily considering the importance of these issue areas to have the most significant and irreversible impacts and the County's overall policy context for the management of these resources.

Of the alternatives considered, the No Project Alternative eliminates the significant and unavoidable impacts identified for the proposed Project; therefore, it is environmentally superior to any project that would lead to a change in existing conditions. However, the No Project Alternative is not feasible under state housing and general plan law and would not achieve the Project Objectives, including planning for the state-mandated 6th Cycle RHNA. When balancing the reductions in the severity of significant and unavoidable impacts with potential increases in significant and unavoidable impacts, the Reduced Project A Alternative has been selected as the environmentally superior alternative. As with the Reduced Project B and C alternatives, this alternative would result in fewer potential rezones and corresponding reductions in potential impacts to air quality, energy, GHG emissions due to a reduction in operational emissions. Additionally, as with the other reduced project alternatives, Reduced Project A Alternative reduces potential impacts related to population and housing and public services and recreation due to a reduction in population as compared to the proposed Project. However, this alternative also eliminates potential rezone sites within the South Patterson Agricultural Area, which preserves urban agricultural to the maximum extent, substantially reduces potential impacts related to airport safety zones, and substantially reduces potential impacts related to airport noise. When taken together and compared against the other alternatives considered for analysis, the Reduced Project A Alternative makes the most sizeable reduction in physical environmental impacts.

Table ES-2. Comparison of Project Impacts by Alternative

Resource Area	Proposed Project	Alternative 1 – No Project Alternative	Alternative 2 – Sustainable Communities Strategy Alternative	Alternative 3 – Reduced Project A	Alternative 4 – Reduced Project B	Alternative 5 – Reduced Project C
Aesthetics and Visual Resources	Significant and Unavoidable	Substantially Less Adverse	Less Adverse	Substantially Less Adverse	Substantially Less Adverse	Less Adverse
Agricultural Resources	Significant and Unavoidable	Substantially Less Adverse	Substantially Less Adverse	Substantially Less Adverse	Substantially Less Adverse	Less Adverse
Air Quality	Significant and Unavoidable	Substantially Less Adverse	Less Adverse	Less Adverse	Less Adverse	Less Adverse
Biological Resources	Significant and Unavoidable	Substantially Less Adverse	Similar	Similar	Similar	Similar
Cultural and Tribal Cultural Resources	Potentially Significant but Mitigable	Less Adverse	Similar	Similar	Similar	Similar
Energy	Insignificant	Substantially Less Adverse	Similar	Less Adverse	Less Adverse	Less Adverse
Greenhous Gas Emissions	Insignificant	Less Adverse	Less Adverse	Less Adverse	Less Adverse	Less Adverse
Hazards and Hazardous Materials	Potentially Significant but Mitigable	Substantially Less Adverse	Similar	Substantially Less Adverse	Less Adverse	Less Adverse
Hydrology and Water Quality	Significant and Unavoidable	Substantially Less Adverse	Substantially Less Adverse	Less Adverse	Less Adverse	Less Adverse
Land Use and Planning	Significant and Unavoidable	Substantially More Adverse	Less Adverse	Similar	Similar	Similar
Noise	Potentially Significant but Mitigable	Substantially Less Adverse	More Adverse	Substantially Less Adverse	Less Adverse	Less Adverse
Population and Housing	Significant and Unavoidable	Less Adverse / Less Beneficial	Similar	Less Adverse	Similar	Similar

Table ES-2. Comparison of Project Impacts by Alternative (Continued)

Resource Area	Proposed Project	Alternative 1 – No Project Alternative	Alternative 2 – Sustainable Communities Strategy Alternative	Alternative 3 – Reduced Project A	Alternative 4 – Reduced Project B	Alternative 5 – Reduced Project C
Public Services and Recreation	Significant and Unavoidable	Less Adverse	More Adverse	Less adverse	Less adverse	Less Adverse
Transportation	Significant and Unavoidable	Less Adverse	Less Adverse	More Adverse	More Adverse	More Adverse
Utilities and Water Supply	Significant and Unavoidable	Substantially Less Adverse	Less Adverse	Substantially Less Adverse	Less Adverse	Less Adverse
Wildfire	Significant and Unavoidable	Substantially Less Adverse	Substantially Less Adverse	Similar	Less Adverse	Less Adverse
Project Objectives Met	Yes	No	Yes, but to a Lesser Extent	Yes, but to a Lesser Extent	Yes, but to a Lesser Extent	Yes, but to a Lesser Extent
Reduce Significant and Unavoidable Impacts?	--	Yes	Partially	Partially	Partially	Partially

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Section 3.1, *Aesthetics and Visual Resources*			
Impact AV-1. The proposed Project could result in adverse effects on public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways.	Potentially significant	**MM AV-1: Objective Design ~~Development~~ Standards for Multiple Unit and Mixed Use Housing Projects.** The County's objective design standards for multiple unit and mixed use housing projects shall apply to all ~~shall revise its zoning ordinances to apply its objective development standards in Section 35.31.020 of the LUDC to~~ multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law. **Requirements and Timing:** This measure shall apply to applicable projects immediately following certification of this EIR. The County shall amend its zoning ordinances to apply existing objective development standards to multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law ~~all higher-density housing projects identified in the County's Housing Element Update, in addition to the qualifying streamlined housing projects compliant with state law~~. Any required amendments ~~Amendments~~ to the zoning ordinances shall be implemented before the issuance of grading or building permits for any new development proposing residential densities of 20 dwelling units per acre or more on sites identified in the Housing Element Update. **Monitoring:** All objective design standards shall be included in the qualifying housing project's plans. County P&D compliance monitoring staff shall ensure compliance through a review of project plans.	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Impact AV-2. The proposed Project could degrade the existing visual character or quality of public views of a site and its surroundings in the Rural Area or potentially conflict with applicable zoning and other regulations governing scenic quality in the Urban Area, including policies and development standards of the County's Comprehensive Plan, Coastal Land Use Plan, and Community Plans.~~Potential future development facilitated by the proposed Project would not result in a new source of substantial light or glare that may adversely affect day or nighttime views in the area.~~	Potentially significant	**MM AV-1 (Objective Design ~~Development~~ Standards for Multiple-Unit and Mixed-Use Housing Projects)** would apply.	Significant and unavoidable
Impact AV-3. Potential future development facilitated by the proposed Project would not result in a new source of substantial light or glare that may adversely affect day or nighttime views in the area.	Insignificant	No mitigation required.	Insignificant
Cumulative Impacts	Potentially significant	**MM AV-1 (Objective Design ~~Development~~ Standards for Multiple-Unit and Mixed-Use Housing Projects)** would apply.	Significant and unavoidable
Section 3.2, *Agricultural Resources*			
Impact AG-1. The proposed Project would potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural uses.	Potentially significant	No mitigation feasible.	Significant and unavoidable
Impact AG-2. The proposed Project would potentially convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning, but would not conflict with Williamson Act contracts or the County's agricultural preserve programs.	Potentially significant	No mitigation feasible.	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Cumulative Impacts	Potentially significant	No mitigation feasible.	Significant and unavoidable
Section 3.3, *Air Quality*			
Impact AQ-1. The proposed Project would not be potentially inconsistent with applicable air quality plans, including the Ozone Plan and County Land Use Element Air Quality Supplement.	Insignificant	No mitigation required.	Insignificant
Impact AQ-2. The proposed Project would potentially violate an air quality standard or substantially contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which Santa Barbara County is in nonattainment.	Potentially significant	**MM T-1 (Site-based TDM)** would apply. **MM AQ-1: PM_{10} and Dust Control.** The County shall require that applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law implement the following measures to minimize short-term PM_{10} fugitive dust emissions. • During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding SBCAPCD's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption. • Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces. • Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems. • If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. • Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area by watering, OR using roll-compaction, OR revegetating, OR by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. • Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard. • The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent the transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		provided to SBCAPCD before grading/building permit issuance and/or map clearance. **Requirements and Timing:** These control measures shall be noted on all grading and building plans. The contractor or builder shall provide County P&D monitoring staff and SBCAPCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to: • Assure all dust control requirements are complied with including those covering weekends and holidays. • Order increased water as necessary to prevent the transport of dust offsite. • Attend the pre-construction meeting. • The dust monitor shall be designated before the issuance of grading. The dust control components apply for the beginning of any grading or construction throughout all development activities until final inspection and until landscaping is successfully installed. **Monitoring:** County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints. **MM AQ-2: Equipment Exhaust.** The County shall require that applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law implement the following measures to minimize short-term construction equipment exhaust emissions to the maximum extent feasible. • Diesel equipment meeting the CARB Tier 4~~Tier 3~~ or higher emission standards for off-road heavy-duty	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		diesel engines should be used to the maximum extent feasible. • On-road heavy equipment with model year 2010 engines or newer should be used to the maximum extent feasible. • Diesel-powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible. • Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, should be used onsite where feasible. • Catalytic converters shall be installed on gasoline-powered equipment, if feasible. • All construction equipment shall be maintained per the manufacturer's specifications. • The engine size of construction equipment shall be the minimum practical size. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction worker trips should be minimized by requiring carpooling and by providing lunch onsite. • Construction truck trips should be scheduled during non-peak hours to reduce peak-hour emissions whenever feasible. • Proposed truck routes should minimize to the maximum extent feasible impacts to residential communities and sensitive receptors. • Construction staging areas should be located away from sensitive receptors such that exhaust and other	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		construction emissions do not enter the fresh air intake of buildings, air conditioners, and windows. **Plan Requirements and Timing:** These control measures shall be noted on all grading and building plans. **Monitoring:** County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints. **MM AQ-3: Project Screening and Project-Specific Air Quality Evaluation.** Project applicants proposing projects that exceed the screening table established in SBCAPCD's most recently available *Scope and Content of Air Quality Sections in Environmental Documents*, or projects involving the development of a variety of land use categories (e.g., mixed use development projects) shall prepare and submit a technical assessment evaluating potential project operation-related air quality impacts to the County for review and approval. The evaluation shall be prepared in conformance with the County and SBCAPCD methodologies for assessing air quality impacts identified in the County's *Environmental Thresholds and Guidelines Manual* and SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents*. If operational emissions associated with proposed development exceed the County's and SBCAPCD's adopted thresholds of significance for either all source emissions or mobile-source only emissions, the County shall require applicants for new development to identify and incorporate mitigation measures to reduce operational air emissions below adopted thresholds. The technical assessment may account for additional requirements applicable to the proposed development, including VMT reduction strategies and transportation demand	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		management measures, that would have the secondary effect of reducing mobile or other source emissions. Specific mitigation measures and their effectiveness in reducing emissions below significance shall be demonstrated as part of the technical assessment evaluation and approved by the County. Identified measures shall be included as part of the conditions of approval for the proposed development. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following: • Participation in the 3CE Prime Program which provides 100 percent renewably sourced electricity to customers. • Design new residential and commercial development to exceed Title 24 compliance requirements through the design of innovative measures, including incorporation of the following into project building plans: o 100 percent electrification of buildings. o Solar-ready development. o Utilize onsite renewable energy systems (e.g., solar, wind, geothermal, biomass, and/or bio-gas) to offset energy use. o Passive cooling strategies, passive cooling planned for or designed into structures (e.g., strategically sized overhands or trellis on the south side, operable skylights, fan, thermal chimney, a cupola or roof opening for hot air venting radiant barrier, or underground cooling tubes). o Residential lighting: whole-home, low voltage, lighting control system with conditional logic. o Non-residential lighting: For daylit spaces, use automatic, non-dimmed lighting control,	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		automatic, continuous dimming of light sources, or integrated dimming daylight control. o Outdoor lighting designed for high efficiency, solar-powered, or controlled by motion detectors. o Natural lighting in buildings. o Building siting and orientation to reduce energy use and maximize opportunities for solar systems. o Summer shading and wind protection measures to increase energy efficiency (e.g., moveable exterior awnings or trees). o Protection of building from heat loss (e.g., planting a windbreak, earthen berm, or fin walls to create an air envelope around the building). o Use of landscaping to shade buildings and parking lots. • Provide and require the use of battery-powered or electric landscape maintenance equipment for new development. • Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). • Include design features to encourage alternate transportation modes. Examples include: o For pedestrians: such as sidewalks, safe streets and parking lot crossings, shade trees, off-street breezeways, alleys and over crossings, placement of parking lots and building entrances to favor pedestrians rather than cars, shower and locker facilities for employees. o For transit riders: all of the above plus safe, sheltered transit stops with convenient access to building entrances.	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		○ For bicyclists: theft-proof and well-lighted bicycle storage facilities with convenient access to building entrances, on-site bikeways between buildings or uses; shower and locker facilities. ○ For carpools and vanpools: preferential parking. • Provide onsite services to reduce the need for offsite travel. Examples include: ○ For residential developments: include childcare, coworking spaces, neighborhood retail stores, postal machines, and automatic teller machines. ○ For mixed use projects involving commercial/office developments: include childcare, food service, postal machines, and banking services. • Provide onsite services to encourage alternative transportation modes, including, but not limited to, rideshare matching, transit subsidies, vanpool subsidies, shuttle services, parking management, guaranteed ride home, and education. • Schedule operations to reduce trips during highly congested periods, including, but not limited to, adjusted business hours, allow alternative work schedules, and schedule deliveries for off-peak hours. • Provide offsite transit services, bikeway, and pedestrian enhancements serving the project. **Plan Requirements and Timing:** Applicants shall prepare and provide technical assessment evaluating operational air quality impacts, as well as demonstrate feasible mitigation measures to reduce impacts, consistent with County and SBCAPCD methodologies to the County for review and approval before issuance for grading or building permits. Mitigation shall be incorporated into the design and shall be noted on all grading and building plans before the issuance of grading permits.	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Implementation of measures shall be demonstrated before issuance of certificate(s) of occupancy. **Monitoring:** County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite.	
Impact AQ-3. The proposed uses and related development enabled under the proposed Project could expose sensitive receptors to substantial pollutant concentrations or toxic or hazardous air pollutants.	Potentially significant	**MM HAZ-1 (Environmental Site Assessment)** would apply. **MM AQ-4: Project Siting and Interior Air Quality Protection.** Applicants of housing sites located within 500 feet of U.S. Highway 101, as measured from the road right-of-way boundary of U.S. Highway 101, located between the segment of U.S. Highway 101 between the junction of SR 154 and the junction of SR 217 shall site residential development outside of the 500-foot limits to the maximum extent feasible. Where development cannot feasibly be sited outside of the 500-foot limits, applicants shall be required to incorporate project design measures, which as an example could include any one or more of the following: • Installation of heating, ventilation, and air conditioning (HVAC) infrastructure within the building to circulate and purify outdoor air sources sufficiently to reduce diesel particulate matter and vehicle emissions. HVAC control systems shall include an air filtration system, such as the Lennox PureAir system, with particulate filters that have a minimum efficiency reporting value (MERV) of 12 for enhanced particulate removal efficiency capable of removing a significant portion of the sub-1.0 micrometer-sized particles expected from diesel combustion as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		• Avoidance of operable windows on the side of the building facing U.S. Highway 101. • Incorporation of dual-pane windows on all windows to make the building exterior as "airtight" as possible to minimize air infiltration. The exterior pressure envelope of the units should be sealed to achieve a tested air leakage rate of no more than 3.0 unit volumes per hour using the blower door ACH50 leak test, or equivalent. • Location of any vents and roof penetrations or other air intakes facing away from U.S. Highway 101 wherever possible. Doorways and entryways should also be located away from U.S. Highway 101 to the extent feasible. • Though not required, location of outdoor areas away from U.S. Highway 101 (e.g., behind thick vegetation screens or within the interior courtyard portions of the development). The applicant shall be responsible for demonstrating the effectiveness and feasibility of the proposed measures. **Plan Requirements and Timing:** These control measures shall be noted on all grading and building plans before the issuance of grading permits. Implementation of measures shall be demonstrated before issuance of certificate(s) of occupancy. **Monitoring:** County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building permit inspectors shall spot-check. Grading and Building shall ensure compliance onsite.	
Impact AQ-4. The proposed uses and related development enabled under the proposed Project	Insignificant	No mitigation required.	Insignificant

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
could generate odors or nuisance problems impacting a considerable number of people.			
Cumulative Impacts	Potentially significant	**MM AQ-1 (PM_{10} and Dust Control)** would apply. **MM AQ-2 (Exhaust Emissions)** would apply. **MM AQ-3 (Project Screening and Project-specific Air Quality Evaluation)** would apply. **MM AQ-4 (Project Siting and Interior Air Quality Protection)** would apply. **MM HAZ-1 (Environmental Site Assessment)** would apply. **MM T-1 (Site-based TDM)** would apply.	Significant and unavoidable
Section 3.4, *Biological Resources*			
Impact BIO-1. The proposed Project could impact ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities.	Potentially significant	**MM BIO-1. Tree Protection Plan.** Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval a TPP. The TPP shall be prepared by an arborist/biologist approved by County P&D and shall determine whether mature native trees are located on the project site. If the biologist finds that there are no mature native trees at the project site, they shall submit a memorandum describing these findings to County P&D for review. If mature native trees are present, the TPP shall determine whether avoidance, minimization, or compensatory measures are necessary. The TPP shall include the following components: <u>Site Plan Component</u>: • All mature native trees shall be identified in the site plan. • All ground disturbance and development shall be sited to avoid mature native trees to the maximum	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		extent practicable as determined by the arborist/biologist. • The location of all tree wells or retaining walls shall be located at least 6 feet from the dripline of all protected trees. • The location of all paths (i.e., driveways, sidewalks, etc.) shall be located at least 25 feet from dripline areas. Only pervious paving materials (e.g., gravel, brick without mortar, turf block) shall be located within 6 feet of dripline areas. <u>Construction Component</u>: • Fencing of all trees to be protected shall be located at least 6 feet outside the dripline with chain-link (or other material satisfactory to the County) fencing at least 3 feet high, staked to prevent any collapse, and with signs identifying the protection area placed in 15-foot intervals on the fencing. • Fencing/staking/signage shall be maintained throughout all grading and construction activities. • Equipment storage (including construction materials, equipment, fill soil, or rocks), and construction staging and parking areas shall be located outside of the protection area. • All trees located within 25 feet of buildings shall be protected from stucco and/or paint during construction. • No irrigation shall occur within 6 feet of the dripline of any protected tree. • The TPP shall require that the following activities shall be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		within the habitat; and tree removal and trimming within the habitat. o If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used • Grading shall be designed to avoid ponding and ensure proper drainage within the driplines of oak trees. Tree Replacement Component: • The replacement trees shall be a native species, planted at a 10:1 ratio for oak trees (15:1 for blue oaks or valley oaks), and a 2:1 ratio for other trees. The replanting location shall be shown on site plans. • Species shall be from locally obtained plans and seed stock. • The trees shall be gopher-fenced. • The trees shall be irrigated with drip irrigation on a timer until established. • The trees shall be weaned off of irrigation over a period of 2~~two~~ to 3~~three~~ years. • No permanent irrigation shall occur within the dripline of any tree. • If replacement trees cannot all be accommodated onsite, the licensee shall submit a plan for approval by the Planning and Development Department for replacement trees to be planted offsite. • All new and replanted trees shall be protected from predation by wild and domestic animals and from human interference by the use of staked, chain link fencing, and gopher fencing during the maintenance period.	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Plan Requirements and Timing: The TPP shall be prepared by the applicant and submitted as part of project application materials. P&D shall review and confirm that all recommendations for the protection of mature native trees are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted by the applicant on project plans and submitted to County P&D for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of mature native trees shall be printed on all building and grading plans. **Monitoring:** County P&D shall ensure that the TPP is included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved TPP. **MM BIO-2. Habitat Protection Plan.** Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval an HPP. The HPP shall be prepared by a biologist approved by County P&D. The HPP shall first determine the presence of sensitive biological resources at a project site, including special-status species and their habitats, ESH, Riparian Corridors,	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		wetlands, and other sensitive natural communities. If the biologist finds that there are no potential sensitive biological resources at the project site, they shall submit a memorandum describing these findings to County P&D for review. If resources are present, the HPP shall determine whether avoidance, minimization, or compensatory measures are necessary. The HPP shall include the following components: • A description of the location and extent of driplines and sensitive root zones for all vegetation to be preserved, locations of sensitive habitats with a detailed description of allowed disturbance, and depictions of original and new locations for replanted species. • Depiction of approved development envelopes, equipment storage, construction staging, and parking areas. • If sensitive habitats, watercourses, or riparian habitats occur within the project site, to the maximum extent feasible as determined by the biologist, the HPP shall identify a 100-foot buffer for ground disturbance and vegetation removal. The area shall be fenced with a fencing type and in a location acceptable to County P&D. Depiction of the type and location of protective fencing or other barriers to be in place to protect the habitat areas. Protective fencing/staking/barriers shall be maintained throughout all grading and construction activities. • If a project site is located adjacent to sensitive habitats, watercourses, or riparian habitats, the project shall be landscaped with only native, non-invasive, or compatible species to the adjacent habitat. • No alteration to stream channels or banks shall be permitted until the applicant demonstrates receipt of	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		all authorizations from USACE, Central Coast RWQCB, and/or CDFW for any planned alteration to stream channels or banks. • If any ground disturbances would occur during the nesting bird season (February – mid-September), the HPP shall include requirements for nesting bird surveys. Prior to any ground disturbing activity, surveys for active nests shall be conducted by a biologist approved by Count P&D following CDFW-approved protocols, no more than 10 days prior to the start of activities. The surveys shall be conducted around the entire project site to identify any nests that are present and to determine their status. Identified nests shall be continuously surveyed for the first 24 hours prior to any activities to establish a behavioral baseline. Once work commences, all nests shall be continuously monitored to detect any behavioral changes. If behavioral changes are observed, the work causing that change shall cease and CDFW shall be consulted for additional avoidance and minimization measures. A minimum no-disturbance buffer of 250 feet around active nests of bird species and a 500-foot no-disturbance buffer around the nests of raptors shall be maintained until the breeding season has ended, or until the biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Any variance from these buffers shall be supported by the biologist and CDFW shall be notified in advance of implementation of a no-disturbance buffer variance. • The HPP shall require that the following activities be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat. o If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used. • If it becomes necessary to disturb or remove any plants within the habitat area, or in the event of unexpected damage, specimens shall be boxed and replanted. If it is not feasible to replant, plants shall be replaced at a minimum using the standards of the County's Standard Habitat Restoration Plan. If replacement plants cannot all be accommodated onsite, a plan must be approved by County P&D for replacement plants to be planted off-site. • If it becomes necessary (as authorized by County P&D) to disturb or remove any plants within the habitat area, or in the event of unexpected damage, a biologist approved by County P&D shall direct the work. Where feasible, specimens shall be boxed and replanted. If a biologist approved by County P&D certifies that it is not feasible to replant, plants shall be replaced at a minimum using the standards of the County's standard Habitat Restoration Plan and under the direction of the biologist. If replacement plants cannot all be accommodated onsite, a plan must be approved by County P&D for replacement plants to be planted offsite. • Grading shall be designed to ensure that habitat areas have proper drainage during and after construction, per biologist recommendations.	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Plan Requirements and Timing: The HPP shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations for the protection of sensitive biological resources are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted by the applicant on project plans and submitted to County P&D for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of sensitive biological resources shall be printed on all building and grading plans. **Monitoring:** P&D shall ensure that the HPP is included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved HPP.	
Impact BIO-2. The proposed Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS.	Potentially significant	**MM BIO-1 (Tree Protection Plan)** would apply. **MM BIO-2 (Habitat Protection Plan)** would apply.	Significant and unavoidable
Impact BIO-3. The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory	Potentially significant	**MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-3. Wildlife Movement Plan.** Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
wildlife corridors or impede the use of native wildlife nursery sites.		ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval a Wildlife Movement Plan. The Wildlife Movement Plan shall be prepared by a biologist approved by County P&D. The Wildlife Movement Plan shall first determine whether the project site has the potential to support wildlife linkages. If the biologist finds that there are no potential wildlife corridors traversing the project site, they shall submit a memorandum describing these findings to County P&D for review. If wildlife corridors are identified, the Wildlife Movement Plan shall analyze proposed fencing in relation to the surrounding opportunities for wildlife movement/migration, identify the type, material, length, and design of proposed fencing, and shall propose non-disruptive, wildlife-friendly fencing, such as post and rail fencing, wire fencing, and/or high-tensile electric fencing, to allow passage by smaller animals and prevent movement in and out of the project sites by larger mammals, such as deer. The evaluation and Wildlife Movement Plan shall also identify project design features that would reduce potential impacts and maintain habitat and wildlife movement. **Plan Requirements and Timing:** The Wildlife Movement Plan shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations for the protection of wildlife corridors are reflected in project plans and permit requirements. All project design features and protection measures shall be graphically depicted by the applicant on project plans and submitted to County P&D for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of wildlife movement	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		corridors shall be printed on all building and grading plans. **Monitoring:** County P&D shall ensure that the Wildlife Movement Plan is included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved Wildlife Movement Plan.	
Impact BIO-4. The proposed Project could conflict with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources.	Potentially significant	No mitigation feasible.	Significant and unavoidable
Cumulative impacts	Potentially significant	**MM BIO-1 (Tree Protection Plan)** would apply. **MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-3 (Wildlife Movement Plan)** would apply.	Significant and unavoidable
Section 3.5, *Cultural and Tribal Cultural Resources*			
Impact CTCR-1. The proposed Project could occur in or near previously unevaluated historic properties and could cause physical demolition, destruction, relocation, or alteration of historical resources.	Potentially significant	**MM CTCR-1: Historic Resource Preservation.** Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include a Phase I historic resources report if they involve major alteration or demolition of buildings, structures, objects, or places that are generally more than 50 years old and: 1) listed or eligible for listing in the CRHR; 2) included in the County's list of Historic Landmarks or Places of Historic Merit under County Code Chapter 18A, Section 18A-3, or; 3) determined by the County to be significant	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		pursuant to criteria for listing on the CRHR (Public Resources Code Section 5024.1). The Phase I report shall include a historic resources inventory and significance evaluation. However, multifamily housing projects that involve minimal interior or exterior modifications to existing structures shall not be required to prepare historic resource reports. Such development may include, but not be limited to, those that do not alter major building features, such as minor roofing repairs with in-kind materials and minor electrical and plumbing improvements that do not involve major changes to interior or exterior walls. If the Phase I report identifies potentially significant historic resources, the owner/applicant shall submit a Phase II report that assesses project impacts and formulates mitigation measures to avoid and preserve the resources through project design and preservation in place. The owner/applicant shall submit a Phase III historic resources report if it is not possible for the project to completely avoid and preserve significant historic resources through project design and preservation in place. The Phase III report shall document the mitigation measures that were carried out and include all related documentation. All required studies shall be prepared according to the requirements of the most current County of Santa Barbara *Environmental Thresholds and Guidelines Manual* (Chapter 8, Guidelines for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). As needed, the historic resource studies shall identify	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		appropriate protection standards to incorporate into the project design, including but not limited to the following: 1. For projects that affect historic structures or buildings, the project shall preserve, restore, and/or renovate the affected historic structures or buildings consistent with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (36 CFR Part 68, 1995) and *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (U.S. Department of the Interior 2017). 2. Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation, or documentation similar to HABS/HAER, is required for any project that would alter or destroy all or a portion of any significant historic resource. 3. For projects that affect historic objects or places, the project shall avoid and preserve the affected historic resources through project design or redesign and preservation in place. **Requirements and Timing:** The owner/applicant shall prepare and submit Phase I, Phase II, and/or Phase III historic resources reports as part of project application materials. P&D shall review and confirm that all recommendations for historic resource preservation are reflected in project plans and permit requirements. All historic resource preservation standards and requirements shall be printed on all building and grading plans. **Monitoring:** The P&D compliance monitoring staff shall ensure compliance with Phase I, Phase II, and/or Phase III recommendations through approval of project plans, a site	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		visit, and/or owner/applicant/contractor-provided photo documentation.	
Impact CTCR-2. The proposed Project could cause disruption, alteration, destruction, or adverse effects on significant archaeological resources.	Potentially significant	**MM CTCR-2: Archaeological Resource Protection.** Applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include any existing archaeological resource surveys or reports for the project site. If the project site has not been subject to an archaeological resource survey, or the prior survey does not satisfy the requirements of a Phase I investigation, the owner/applicant shall submit a Phase I archaeological resource report documenting any archaeological resources that adjoin or exist within the project site. If the Phase I report indicates that archaeological resources adjoin or exist within the project site, the project shall avoid and preserve the resources through project design and preservation in place, or the owner/applicant shall submit a Phase II archaeological report that evaluates the significance of the archaeological resources. If the Phase II archaeological report indicates that the archaeological resources are significant, the applicant shall expand the Phase II archaeological report to assess project impacts and formulate mitigation measures to avoid and preserve the resources through project design and preservation in place. If the Phase II archaeological investigation finds that the archaeological resources are significant and potential impacts cannot be avoided through project design and preservation in place, the applicant shall submit a Phase III archaeological report to carry out mitigation measures to recover, analyze, interpret, report, curate, and preserve archaeological data that would otherwise be lost due to unavoidable impacts to significant resources.	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		All required studies shall be prepared according to the requirements of the most current County of Santa Barbara Environmental Thresholds and Guidelines Manual (Chapter 8, Guidelines for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). As needed, the archaeological resource studies shall identify appropriate protection standards to incorporate into the project design, including but not limited to the following: 1. In accordance with applicable cultural resource protection policies, development shall be located in areas on a lot that would avoid disturbance of known significant archaeological resources. 2. If significant archaeological resources are located within 60 meters (200 feet) of ground-disturbing activities, the archaeological site shall be fenced and appropriately protected during grading and construction. 3. For any work conducted within or near a significant archaeological site, an approved archaeologist and Native American observer, as appropriate, shall monitor the site during grading and construction (including abandonment). 4. An educational workshop shall be conducted for construction workers before and during construction. **Requirements and Timing:** The Phase I, Phase II, and/or Phase III archaeological resource investigations and reports shall be prepared by the owner/applicant and submitted as part of project application materials. P&D shall review and confirm that all recommendations for archaeological resource protection are reflected in project plans and permit requirements, and consistent with	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		applicable cultural resource protection policies. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted by the owner/applicant on project plans and submitted to P&D for review and approval before issuance of final approvals or permits by the County. All archaeological resource protection standards and requirements shall be printed on all building and grading plans. **Monitoring:** P&D shall ensure that the archaeological resource report(s) is included as part of the project application and that all archaeological resource protection standards are reflected in project plans. The owner/applicant shall demonstrate to P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved archaeological resource protection plan. **MM CTRC-3: Stop Work at Encounter.** For future residential and mixed use development resulting from the proposed Project and involving ground disturbance, the owner/applicant and/or their agents, representatives, or contractors shall stop or redirect work immediately in the event archaeological, historic, or tribal cultural resources are encountered during grading, construction, landscaping, or other construction-related activity. The owner/applicant shall immediately contact P&D. A P&D-approved archaeologist shall evaluate the significance of the find in compliance with the provisions of state law and the most current County of Santa Barbara *Environmental Thresholds and Guidelines Manual* (Chapter 8, Guidelines	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). Appropriate mitigation to protect and preserve significant archaeological, historic, or tribal cultural resources encountered during construction shall be required and funded by the owner/applicant. **Requirements and Timing:** P&D shall confirm that this cultural resource protection standard shall be printed on all building and grading plans. **Monitoring:** The P&D permit processing planner shall check plans before the issuance of a permit for the proposed uses and related development. P&D compliance monitoring staff shall spot-check in the field throughout grading and construction.	
Impact CTCR-3. The proposed Project could disrupt human remains, including those interred outside of formal cemeteries.	Potentially significant	**MM CTCR-3 (Stop Work at Encounter)** would apply. **MM CTCR-4: Encountering Human Remains.** For future residential and mixed use development resulting from the proposed Project and involving ground disturbance, if human remains are accidentally discovered or recognized during construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the most likely descendent of the deceased Native American, who shall help determine what course of action should be taken in dealing with the remains. Per PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices,	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC Section 5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. **Requirements and Timing:** If human remains are discovered, construction activities shall stop immediately. The owner/applicant shall immediately contact P&D permit compliance staff, who would be responsible for contacting the County Coroner. These cultural resource protection standards shall be printed on all building and grading plans. **Monitoring:** P&D permit compliance staff shall ensure that no further disturbance shall occur until the County Coroner has made all necessary findings as to origin and disposition pursuant to PRC Section 5097.98.	
Impact CTCR-4. The proposed Project could cause disruption, alteration, destruction, or adverse effects on significant tribal cultural resources.	Potentially significant	**MM CTCR-2 (Archaeological Resource Protection)** would apply. **MM CTCR-3 (Stop Work at Encounter)** would apply. **MM CTCR-4 (Encountering Human Remains)** would apply. ~~**MM CTCR-5: Post-Discovery Tribal Consultation.** For future residential and mixed use development resulting from the proposed Project, if tribal cultural resources are identified or discovered during construction, landscaping, or other construction-related activities, the owner/applicant and/or their agents, representatives, or contractors shall immediately contact P&D. P&D shall coordinate consultation with a Native American tribal representative. The appropriate Native American tribal representative shall be identified using the most recent contact list provided by the NAHC. If mitigation actions~~	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		~~are required through consultation with the Native American tribal representative, appropriate mitigation shall be funded by the applicant.~~ ~~**Requirements and Timing:** If tribal cultural resources are discovered, construction activities shall stop immediately. The applicant/owner shall immediately contact P&D permit compliance staff, who would consult with a Native American tribal representative. This condition shall be printed on all building and grading plans.~~ ~~**Monitoring:** P&D permit compliance staff shall ensure that no further disturbance shall occur via periodic site visits and other appropriate measures until consultation with a Native American tribal representative is complete and any site-specific mitigation has been identified and implemented.~~	
Cumulative Impacts	Potentially significant	**MM CTCR-1 (Historic Resource Preservation)** would apply. **MM CTCR-2 (Archaeological Resource Protection)** would apply. **MM CTCR-3 (Stop Work at Encounter)** would apply. **MM CTCR-4 (Encountering Human Remains)** would apply. ~~**MM CTCR-5 (Post-Discovery Tribal Consultation)** would apply.~~	Significant but mitigable
Section 3.6, *Energy*			
Impact EN-1. The proposed Project would increase energy demand, but would not result in a substantial increase in demand, necessitate expansion or installation of new energy infrastructure, or result in wasteful, inefficient, and unnecessary consumption of energy resources	Insignificant	No mitigation required.	Insignificant

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
during the construction or operation of individual housing developments.			
Impact EN-2. The proposed Project would conform to the applicable plans, policies, and regulations regarding energy conservation relative to housing development.	Insignificant	No mitigation required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation required.	Insignificant
Section 3.7, *Greenhouse Gas Emissions*			
Impact GHG-1. The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	Insignificant	No mitigation required.	Insignificant
Impact GHG-2. The proposed Project would not be inconsistent with applicable plans, policies, and regulations that are adopted to reduce GHG emissions.	Insignificant	No mitigation required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation required.	Insignificant
Section 3.8, *Hazards and Hazardous Materials*			
Impact HAZ-1. The proposed Project could involve the routine transport, use, or disposal of hazardous materials that could create a significant hazard to the public or result in the release of hazardous materials into the environment.	Insignificant	No mitigation required.	Insignificant
Impact HAZ-2. The proposed Project could occur on hazardous sites or otherwise result in foreseeable upset involving the disturbance of existing soil or groundwater contamination.	Potentially significant	**MM HAZ-1: Environmental Site Assessment**. Applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall retain a qualified hazardous materials Environmental Professional to prepare a Phase I ESA. The Phase I ESA shall be prepared in accordance with ASTM Standard Practice E 1527-13 or the Standards and Practices for AAI, prior to	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		any land acquisition, demolition, or construction activities. The Phase I ESA shall identify specific RECs, if present, which may require further sampling / remedial activities by a qualified hazardous materials Environmental Professional with Phase II / site characterization experience prior to land acquisition, demolition, and/or construction. The Environmental Professional shall identify proper remedial activities to be implemented by the applicant/owner, if necessary. **Requirements and Timing:** The applicant/owner shall submit the Phase I ESA as part of project application materials. County P&D shall review and confirm that all required remedial activities, if necessary, are reflected in project plans and permit requirements before the issuance of grading or building permits. **Monitoring:** County P&D compliance monitoring staff shall ensure compliance with remedial activities, if necessary, through approval of project plans, a site visit, and/or applicant/contractor-provided documentation. **MM HAZ-2. Incidental Discovery of Contamination.** For future residential and mixed use development resulting from the proposed Project, in the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site, construction activities in the immediate vicinity of the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer, or similarly qualified individual) shall conduct an investigation to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		contaminants of concern and the potential risk each contaminant could pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of the contamination, if any, appropriate agencies shall be notified. If needed, a Site Health and Safety Plan that meets OSHA and Cal/OSHA requirements shall be prepared and in place prior to the commencement of work in any contaminated area. **Requirements and Timing:** If previously unknown or unidentified soil and/or groundwater contamination is discovered, construction activities would stop immediately. The applicant/owner shall immediately notify County permit compliance staff. The applicant/owner would be responsible for contacting appropriate agencies (e.g., SBCFD). This condition shall be printed on all building and grading plans. **Monitoring:** County permit compliance staff shall ensure that no further disturbance shall occur until the contaminates are identified and a soil management plan and/or remediation plan is prepared and implemented.	
Impact HAZ-3. The proposed Project could result in potentially significant impacts from former oil or gas pipelines or well facilities.	Potentially significant	**MM HAZ-1 (Environmental Site Assessment)** would apply. **MM HAZ-2 (Incidental Discovery of Contamination)** would apply.	Significant but mitigable
Impact HAZ-4. The proposed Project would result in residential development within the Santa Maria Airport, Santa Ynez Airport, Lompoc Airport, Santa	Potentially significant	**MM HAZ-3. Compliance with ALUCP Density and Open Land Requirements**. Applications for multifamily housing projects that are proposed on County-owned sites	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Barbara Municipal Airport, and VSFB Land Use Plan areas, presenting potential safety hazards to people residing or working in the area.		and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be consistent with the density, height, and open land requirements provided in the ALUCPs for airports in Santa Barbara County. **Requirements and Timing:** This measure shall apply to applicable projects immediately following certification of this EIR. Within two years following EIR certification, the County shall adopt the ALUCPs and amend the zoning ordinances to include reference to the density and open land requirements in the ALUCPs for residential development. **Monitoring:** County P&D compliance monitoring staff shall ensure compliance through a review of project plans.	
Cumulative Impacts	Insignificant	No mitigation required.	Insignificant
Section 3.9, *Hydrology and Water Quality*			
Impact HWR-1. The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Insignificant	No mitigation required.	Insignificant
Impact HWR-2. The proposed Project would decrease groundwater supplies, interfere substantially with groundwater recharge, or impede sustainable groundwater management of local groundwater basins.	Potentially significant	No mitigation feasible.	Significant and unavoidable
Impact HWR-3. The proposed Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces.	Potentially significant	**MM HWR-1. Flood Hazard Development Standards.** Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law ~~and which are located within a Special Flood Hazard Area~~ shall address onsite flood hazards to eliminate flood risks to life and property consistent with the Flood Control District's	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Standard Conditions of Project Plan Approval~~, including, but not limited to, compliance with the following requirements:~~ ~~1. The applicant/owner shall provide a site plan of the proposed development showing the limits of the special flood hazard areas and base flood elevations as they appear on the most current FEMA FIRM.~~ ~~2. The applicant/owner shall provide a site plan of the proposed development showing the top of the bank along those parts of a watercourse that are included within the areas of special flood hazard shown in the FIRM and along those parts of a watercourse that lie between areas of special flood hazard on the same watercourse.~~ ~~3. The applicant/owner shall demonstrate appropriate improvements or measures to mitigate the increased runoff by directing drainage to an acceptable watercourse, improving downstream facilities, mitigating the increased runoff onsite, and/or as otherwise required by the Public Works Director. Runoff shall be conveyed safely to prevent erosion from slopes and/or channels. Natural drainage systems shall be utilized to the maximum extent practical. Disturbed slopes shall be vegetated with appropriate native or drought-tolerant vegetation, permanent channel crossings shall be stabilized, and energy dissipaters such as riprap will be used at outlets of new storm drains, culverts, conduits, or channels that enter unlined channels to minimize erosion potential.~~ ~~4. Improvements to intercept and convey offsite and onsite runoff through the project site to a Flood Control District-approved water course or drainage facility.~~	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		~~5. Development located within the limits of the floodplain/floodway as shown on the current FIRM shall process a conditional letter of map revision prior to map recordation or zoning clearance.~~ ~~6. All development shall comply with applicable requirements of the most current Standard Conditions for Project Plan Approval-Water Quality Best Management Practices, as administered by the Santa Barbara County Public Works Department, Project Clean Water.~~ ~~7. Hydrologic studies prepared by a California-licensed civil engineer shall be made of the watershed area contributing drainage to the site. Both calculations and clearly marked watershed maps shall be submitted at the plan check submittal for approval by the Public Works Director. Contributing areas shall be based on natural contours or an accepted master drainage plan. Drainage quantities shall be derived from considerations that include the expected future development of the watershed, soil types, historical storm data, and the gradient of the terrain. These considerations must receive approval from the Public Works Director. For most major channels, discharge rates will be supplied by the Public Works Director.~~ ~~8. Storm drains and drainage inlets shall be sized for a peak 25-year runoff event with a positive overland escape design for a 100-year storm. Storm drains shall be constructed of at least Class III reinforced concrete pipe with a minimum diameter of 18" unless other materials, pipe classifications, or sizes are approved by the Public Works Director. When an existing culvert is to be extended and/or the grade changed, a concrete collar must be used.~~	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		~~9. The lowest finish floor elevation of all new structures shall be at least 2 feet above the 100-year water surface elevation. Graded lot pads with slab-on-grade foundations shall be at least 1.5 feet above the 100-year water surface elevation, with the finish floor 2 feet above the 100-year water surface elevation. Finish floor elevations may be increased if deemed necessary by the Public Works Director. Finish floor elevations shall be higher than the water surface elevations of the overland escape of adjacent streets, bridges, and other obstructions.~~ ~~10. In adherence to Flood Control District requirements, new development would include detention basins on site to reduce the post-development peak stormwater runoff discharge rate as specifically defined below:~~ ~~a. In all areas of the County of Santa Barbara, except New Cuyama~~ ~~b. Other areas of the county if downstream facilities are determined by the Public Works Director to be inadequate.~~ ~~11. Hydrologic/hydraulic analysis of detention basins shall be performed by a California-licensed civil engineer using a commercially available version of the Santa Barbara Urban Hydrograph method or Flood Control District-approved equivalent.~~ ~~12. Drainage improvements proposed to be dedicated to flood control shall be shown on a standalone improvement plan and profile sheets.~~ ~~13. During construction, if differing site conditions are encountered that materially affect the drainage improvements shown on the approved plans, the engineer of record shall submit revised plans for the Flood Control District's review and approval prior to the construction of the work.~~	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Requirements and Timing: The Flood Control District shall apply the Standard Conditions of Project Plan Approval for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law prior to the issuance of grading or building permits.~~This measure shall apply to applicable projects immediately following certification of this EIR. The County shall amend the zoning ordinances to include requirements for compliance with the Flood Control District's Standard Conditions of Project Plan Approval. Amendments to the zoning ordinances shall be implemented within 2 years of Housing Element Update adoption.~~ **Monitoring:** County P&D compliance monitoring staff and Flood Control District Review shall ensure compliance through a review of project plans.	
Impact HWR-4. The proposed Project would not substantially increase the risk of release of pollutants in the event of inundation by flood hazards, tsunamis, and seiche.	Insignificant	No mitigation required.	Insignificant
Impact HWR-5. The proposed Project would potentially conflict with or obstruct the implementation of a water quality control plan.	Potentially significant	No mitigation feasible.	Significant and unavoidable
Cumulative Impacts	Potentially significant	**MM HWR-1 (Flood Hazard Development Standards)** would apply.	Significant and unavoidable
Section 3.10, *Land Use and Planning*			
Impact LU-1. The proposed Project would not divide an established community.	Insignificant	No mitigation required.	Insignificant
Impact LU-2. The proposed Project could result in adverse environmental impacts due to potential conflicts with applicable land use plans, policies, or	Potentially Significant	**MM AV-1 (Objective Design ~~Development~~ Standards for Multiple Unit and Mixed Use Housing Projects)** would apply. **MM BIO-1 (Tree Protection Plan)** would apply.	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
regulations adopted for the purpose of avoiding or mitigating an environmental effect.		**MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-3 (Wildlife Movement Plan)** would apply. **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements**) would apply. **MM HWR-1 (Flood Hazard Development Standards)** would apply. **MM NOI-1 (Construction Hours)** would apply. **MM NOI-2 (Noise Study and Site-based Attenuation)** would apply. **MM T-1 (Site-based TDM)** would apply. **MM T-2 (Construction Traffic and Access Management Plan)** would apply. **MM T-3 (Funding and Mitigation Fee Programs Update)** would apply. **MM WF-1 (Onsite Defensible Space Requirements)** would apply. **MM LU-1: Additional Allowed Uses in Design Residential (DR) Zoning.** The County shall amend the zoning ordinances for the DR Zone District to allow the following uses as part of proposed projects on sites zoned DR: 1. ~~Public Parks, Recreation, and Trails~~Open Space a. All or a portion of required open space may be provided as public open space and developed as public parks, trails, or other public recreational facilities (e.g., sports fields or courts, playgrounds, picnic or BBQ areas, community center, pool/aquatic facility, gymnasium) to provide recreational opportunities for use by both the residents of the site and the public. In siting and designing public open space, the project shall consider the following:	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		i. The need to protect public use areas historically used by the public such as beaches and trails; ii. The avoidance of siting of structures in hazardous areas or on steep slopes; iii. The protection of environmentally sensitive habitat areas and archaeological sites; and iv. The protection of scenic areas of the site. b. The County may require the applicant or Homeowner's Association to maintain all public open spaces and related facilities for a specified period after occupancy of the project or may require payment of an in-lieu fee if the County maintains the public open space and related facilities. If the applicant or Homeowner's Association is to maintain public open spaces, prior to the approval of any permits for construction, a bond or other approved financial security shall be posted guaranteeing maintenance. 2. Commercial Recreational Facilities and Neighborhood-Serving Commercial Uses a. Commercial recreational facilities and neighborhood-serving commercial uses (i.e., convenience store, café, corner store) may be allowed in higher-density (i.e., 20 du/ac or more) developments, provided that: i. Such commercial recreational facilities are <u>accessory to and</u> compatible with the residential uses; ii. Such commercial uses are <u>accessory to the residential use and</u> limited to those serving such day-to-day needs of residents in the	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		immediate area such as food, pharmacy, fuel, and other incidentals; iii. Such commercial uses shall be an integral part of the development and accessible via active transportation modes (i.e., walking, biking) within the development; and iv. Such commercial uses shall not, by reason of their construction, lighting, location, manner or timing of operation, parking arrangements, signs, or other characteristics have adverse effects on residential uses within or adjoining the development or create traffic congestion or hazards to vehicular or pedestrian traffic. **Requirements and Timing:** The County shall amend the zoning ordinances for the DR Zone District within 2~~two~~ years following adoption of the proposed Project by the Board of Supervisors. **Monitoring:** County P&D shall ensure future residential development projects with DR zoning address all applicable site design features and requirements listed in this mitigation measure.	
Impact LU-3. The proposed Project could potentially cause adverse quality-of-life effects on existing communities due to traffic, noise, or other physical environmental impacts.	Potentially Significant	**MM AV-1 (Objective Design ~~Development~~ Standards for Multiple Unit and Mixed Use Housing Projects)** would apply. **MM NOI-1 (Construction Hours)** would apply. **MM NOI-2 (Noise Study and Site-based Attenuation)** would apply. **MM T-1 (Site-based TDM)** would apply. **MM T-2 (Construction Traffic and Access Management Plan)** would apply. **MM T-3 (Funding and Mitigation Fee Programs Update)** would apply.	See Impacts AV-1, AV-2, NOI-1, NOI-2, T-1, and T-2

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Cumulative Impacts	Potentially Significant	**MM AV-1 (Objective Design ~~Development~~ Standards for Multiple Unit and Mixed Use Housing Projects)** would apply. **MM BIO-1 (Tree Protection Plan)** would apply. **MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-3 (Wildlife Movement Plan)** would apply. **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements**) would apply. **MM HWR-1 (Flood Hazard Development Standards)** would apply. **MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** would apply. **MM NOI-1 (Construction Hours)** would apply. **MM NOI-2 (Noise Study and Site-based Attenuation)** would apply. **MM T-1 (Site-based TDM)** would apply. **MM T-2 (Construction Traffic and Access Management Plan)** would apply. **MM T-3 (Funding and Mitigation Fee Programs Update)** would apply. **MM WF-1 (Onsite Defensible Space Requirements)** would apply.	Significant and unavoidable
Section 3.11, *Noise*			
Impact NOI-1. The proposed Project would generate temporary construction noise from both individual housing projects and the development of several adjacent housing projects.	Potentially Significant	**MM T-1 (Site-based TDM)** would apply. **MM NOI-1: Construction Hours.** For future residential and mixed use development resulting from the proposed Project, all construction activity, including equipment maintenance and site preparation, shall be limited to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday, or as otherwise specified in a community plan. No construction shall occur on weekends or state holidays. Non-noise-generating construction activities, such as	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		interior plumbing, electrical, drywall, and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) are not subject to these restrictions. **Plan Requirements and Timing:** P&D shall confirm that this construction hours standard shall be printed on all building and grading plans. The applicant/contractor shall post signage stating these restrictions at all construction site entries. Signs shall be posted before the commencement of construction and maintained throughout construction. **Monitoring:** P&D's permit processing planner shall check plans to ensure this standard is required before the issuance of a permit for the development and pre-construction meeting. P&D compliance monitoring staff shall spot-check in the field throughout grading and construction. **MM NOI-2: Noise Study and Site-based Attenuation**. Applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include a site-specific noise study that documents the existing noise conditions on site and recommends attenuation strategies and techniques to address sensitive receptors and achieve acceptable noise levels under County standards. An onsite noise study shall be performed by an acoustical engineer. The noise study shall measure and report the existing ambient Average Day-Night (L_{dn} or CNEL) noise environment within the project site, including transportation noise sources and any transient or nuisance noise sources. Based on project details, the noise study shall identify and quantify the potential project-related noise sources from construction and operation. All	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		noise control techniques and recommendations in this report shall be incorporated into the project design to reduce exterior noise to at or below 65 dBA and interior noise to at or below 45 dBA. Construction noise assessment shall consider both transient and continuous noise sources, including equipment used by each project phase. To address construction noise, the noise study shall: • Identify noise control measures to ensure construction noise that exceeds 65 dBA is contained within the project site and does not affect sensitive receptors in the project vicinity per County thresholds, including acoustical shielding, sound blankets, engine mufflers, and designated construction routes. • Identify and notify properties within 500 feet of the project site that will receive notification of proposed construction timelines and noise complaint procedures to minimize potential annoyance or nuisance complaints related to construction noise no less than 10 days before initiation of any grading and construction activity. Operational noise shall consider both stationary noise, including HVAC and utilities, and transportation noise, including permanent increases in roadway noise and periodic peak noise from trucks and other services, and airport noise. To address operational and transportation noise, the noise study shall: • Document that the proposed project is not within 1,000 feet of a highway or major roadway, 3,000 feet of a railroad, or 2 miles of an airport. If the project is within any of those distances, then either:	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		○ Provide documentation showing the ambient noise level in all areas of the project site would be at or below 65 dB L_{dn}, or ○ Provide documentation showing that there is an effective noise barrier or noise attenuating feature of the project that reduces the ambient noise level in all areas of the project site at or below 65 dB L_{dn}, or ○ Provide documentation showing the ambient noise level in areas of the project site that would contain sensitive receptors including residences and recreational areas at would be below 75 dB L_{dn} and identifying noise attenuation requirements that will bring the interior noise level to 45 dB L_{dn} and/or exterior noise level to 65 dB $L_{dn.}$ Including the feasibility of noise barriers, site design, building orientation, and other features to meet prescribed exterior noise standards. An analysis of the noise insulation effectiveness of the proposed construction shall be documented, showing that the building design and construction specifications are adequate to meet the prescribed interior noise standard. **Requirements and Timing:** The required noise study shall be prepared by the applicant and submitted as part of project application materials. P&D shall review and confirm that all recommendations of the noise study are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans. **Monitoring:** P&D shall ensure that the noise study is included as part of the project application and that all recommendations of the noise study are reflected in project plans. The applicant shall demonstrate to P&D	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		compliance monitoring staff that all required construction noise noticing and attenuating techniques and activities are completed before ground disturbance. Building inspectors shall ensure that all noise control measures have been built or incorporated according to the approved plans. If an acoustical survey is required, P&D compliance monitoring staff will ensure that recommended onsite noise levels have been reached before the Final Building Inspection Clearance.	
Impact NOI-2. The proposed Project would permanently increase operational roadway noise levels, particularly on highways and primary roadways, and create permanent sources of noise from deliveries, trash hauling, parking, and mechanical equipment.	Potentially Significant	**MM T-1 (Site-based TDM)** would apply. **MM NOI-2 (Noise Study and Site-based Attenuation)** would apply.	Significant but mitigable
Impact NOI-3. The proposed Project would not potentially expose adjacent sensitive receptors or structures to excessive groundborne vibration or groundborne noise levels.	Insignificant	No mitigation required.	Insignificant
Impact NOI-4. The proposed Project would potentially expose new residents or workers to excessive airport noise.	Potentially Significant	**MM NOI-2 (Noise Study and Site-based Attenuation)** would apply.	Significant but mitigable
Cumulative Impacts	Potentially Significant	**MM NOI-1 (Construction Hours)** would apply. **MM NOI-2 (Noise Study and Site-based Attenuation)** would apply.	Significant but mitigable
Section 3.12, *Population and Housing*			
Impact PH-1. The Project would potentially induce substantial unplanned population growth within the county.	Potentially significant	No mitigation feasible.	Significant and unavoidable
Impact PH-2. The Project would not displace substantial numbers of existing people or housing.	Insignificant	No mitigation required.	Insignificant

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Cumulative Impacts	Potentially significant	No mitigation feasible.	Significant and unavoidable
Section 3.13, *Public Services and Recreation*			
Impact PSR-1. The proposed Project could result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts.	Potentially significant	No mitigation feasible**.**	Significant and unavoidable
Impact PSR-2. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered law enforcement and police protection or emergency medical and healthcare facilities, the construction of which could cause significant environmental impacts.	Insignificant	No mitigation required.	Insignificant
Impact PSR-3. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts.	Insignificant	No mitigation required.	Insignificant
Impact PSR-4. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts.	Insignificant	No mitigation required.	Insignificant
Impact PSR-5. The proposed Project could increase the use of existing parks and recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or could require the construction or expansion of recreational facilities which might have an adverse impact on the environment.	Potentially Significant	**MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** would apply.	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Cumulative Impacts	Potentially significant	**MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** would apply.	Significant and unavoidable
Section 3.14, *Transportation*			
Impact T-1. The proposed Project could result in potential conflicts with regional transportation plans, or County transportation plans, policies, or regulations.	Potentially significant	**MM T-1. Site-based TDM.** Applications for multifamily housing and mixed use housing projects shall implement site design strategies to reduce vehicle trips to and from the project site. Site-based TDM strategies may include but not be limited to VMT-reducing measures identified in the CAPCOA *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (December 2021). The following site-based TDM measures shall be integrated into project design and plans ~~as feasible~~ based on site and project conditions: • **Provide Pedestrian Network Improvements**. This measure requires developers to provide pedestrian connections from the project site ~~frontage~~ to and between existing facilities, including existing pedestrian routes. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive for short-distance trips. This mode shift results in a reduction of up to 6.4 percent of VMT. • **Construct or Improve Bike Facilities**. This measure requires projects located adjacent to existing and planned improvements identified in the County ATP to construct or improve bicycle facilities (Class I, II, III, or IV), including providing connections where appropriate through the site to the existing bikeway network in the project vicinity. Providing bicycle infrastructure helps to improve biking conditions within an area. This encourages a mode shift on the roadway parallel to the bicycle facility from vehicles to bicycles, reducing VMT up to 0.8 percent.	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		• **Provide Bike Parking**. This measure requires projects to provide short-term and long-term bicycle parking facilities. Parking can be provided in designated areas or added within rights-of-way. • **Implement a Homeowners' Association (HOA) Subsidized or Discounted Transit Program or other Ridesharing/Carpool and Education Program.** This measure requires projects located within one mile of a transit stop to provide subsidized, discounted, or free transit passes for residents within the project's HOA. Reducing the out-of-pocket cost of choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This program would also facilitate ridesharing and carpooling among the project's residents and educate residents about opportunities to use active transportation rather than drive a vehicle. **Requirements and Timing:** The site-based TDM plan shall be prepared by the applicant and submitted as part of project application materials. County P&D and the Transportation Division shall review and confirm that all feasible site-based TDM measures are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans. The applicant shall estimate the effectiveness of the site-based TDM measures in reducing project VMT. **Monitoring:** County P&D and the Transportation Division shall ensure that the site-based TDM plan is included as part of the project application and that all required measures are reflected in the project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that all required TDM measures are constructed onsite and offsite, as required. Building inspectors shall	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		ensure that measures have been built or incorporated according to the approved plans. **MM T-3. Funding and Mitigation Fee Programs Update.** The County shall update the funding and fee mitigation programs. • **Evaluate the County's ATP.** The County shall review and evaluate the County's ATP and/or previously adopted community plans for active transportation improvements that would directly serve the selected housing sites in the adopted Housing Element Update. These improvements shall become required mitigation for the proposed Project, where feasible. • **Update Funding and Mitigation Fee Programs**. The County shall update its CIP, TIPs, including Goleta and Orcutt, create TIPs for communities that require substantial transportation improvement planning and funding, and the County's Transportation Impact Mitigation Fees (Chapter 23C of the County Code). The Transportation Impact Mitigation Fees shall reflect the fair-share contribution of new housing development to capital improvements identified in the CIP, TIPs, and/or the ATP, that mitigate transportation impacts from the Housing Element Update. **Requirements and Timing:** The County shall complete MM T-3 within 2 years of the Housing Element Update adoption. All housing projects under the Housing Element Update shall pay ~~updated~~ fair-share mitigation fees in accordance with the adopted mitigation fee program. **Monitoring:** The County P&D Department shall ensure that this measure is included in the annual budget and work program for the second fiscal year following the adoption of the Housing Element Update.	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Impact T-2. The proposed Project could result in potentially significant increases in total VMT per service population within the county.	Potentially significant	**MM T-1 (Site-based TDM)** would apply. **MM T-3 (Funding and Mitigation Fee Programs)** would apply.	Significant and unavoidable
Impact T-3. The proposed Project could result in adverse changes to the transportation safety environment.	Potentially significant	**MM T-3 (Funding and Mitigation Fee Programs)** would apply. **MM T-2. Construction Traffic and Access Management Plan.** Applications for housing projects shall prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic and Access Management Plan shall be designed to: • Prevent traffic impacts on the surrounding roadway network; and • Ensure safety for both those constructing the project and the surrounding community; and The Plan shall, at a minimum, include the following: • Designated haul routes; • Designation Alternatives Pedestrian Access Routes, consistent with ADA and the Public Rights-of-Way Accessibility Guidelines (PROWAG); • Onsite staging, which would avoid residential streets to the maximum extent feasible; • Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction) to address circulation requirements and public safety; • Construction crew parking; and • Emergency access provisions including training for flagmen. Ongoing Requirements throughout construction: • A detailed Construction Traffic Control Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations;	Significant but mitigable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. Such plans shall be reviewed and approved by the County Planning and Development Department, in coordination with the County Public Works Department, prior to issuance of a demolition, excavation, grading, or building permit and implemented in accordance with this approval. • Temporary alternative pedestrian access routes with basic accessible features shall be designated whenever an existing pedestrian access route is closed for construction. • Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself. **Requirements and Timing.** The required plan shall be prepared by the applicant and submitted as part of project application materials. P&D shall review and confirm that all recommendations of the project's noise study, as applicable, are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans. Prior to project implementation, the applicant shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, and media listing/notification), as well as provide a call line for complaints and concerns regarding construction traffic. The applicant shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, local police and fire departments, County Public Works Department, and County P&D) and all owners and residential and commercial tenants of property within a radius of 500 feet before project	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		implementation. The applicant shall coordinate construction work with affected agencies in advance of the start of work. The applicant shall obtain approval from the County for any haul routes for earth, concrete, or construction materials and equipment hauling. **Monitoring.** County P&D shall ensure that the plan is included as part of the project application and that all recommendations are reflected in the project plans. The applicant shall demonstrate to P&D compliance monitoring staff that all required construction noticing and reporting requirements are completed before ground disturbance. Building inspectors shall ensure that all measures have been incorporated according to the approved plans.	
Cumulative Impacts	Potentially significant	**MM T-1 (Site-based TDM)** would apply. **MM T-2 (Construction Traffic and Access Management Plan)** would apply. **MM T-3 (Funding and Mitigation Fee Programs)** would apply.	Significant and unavoidable
Section 3.15, *Utilities and Water Supply*			
Impact UWS-1. The proposed Project would require or result in the construction, expansion, or replacement of utilities, including water and wastewater facilities, which could potentially result in significant environmental effects.	Potentially significant	All MMs identified in Section 3.3, *Air Quality,* Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.8, *Hydrology and Water Quality,* and Section 3.11, *Noise* would apply.	Significant and unavoidable
Impact UWS-2. The proposed Project would result in an increased water demand that could exceed the capacity of water purveyors to serve future development during normal, dry, and multiple dry years.	Potentially significant	**MM UWS-1. Infrastructure, Services, Utilities, and Related Facilities.** Applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be served by public water and wastewater (sewer) districts or agencies, if such service is available, consistent with the County's zoning ordinances, as well as the CFC	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		and California Plumbing Code. The applicant shall provide documentation from the appropriate public water and wastewater districts or agencies demonstrating that adequate water and wastewater services are available to serve the project; this includes water supply, system pressure, and service infrastructure, as well as wastewater conveyance and treatment capacity. The documentation shall also identify any required service extensions or improvements that are required to adequately serve the project, such as sewer laterals and main connections adequately sized to convey project wastewater flows, or water mains designed and sized to provide adequate flows and pressure to serve the project's general water demands and fire flows (i.e., pumps), considering the proposed height of the project's buildings. **Requirements and Timing.** Documentation from the appropriate public water and wastewater districts or agencies shall be obtained by the applicant and submitted as part of project application materials. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the future proposed project. **Monitoring.** County P&D shall review and confirm that adequate water supply and infrastructure and wastewater conveyance and treatment capacity are available to serve the project.	
Impact UWS-3. The proposed Project would result in increased wastewater generation, which may exceed the capacity of wastewater treatment providers in the county.	Potentially significant	**MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities)** would apply.	Significant and unavoidable
Impact UWS-4. The proposed Project would result in the generation of solid waste that could exceed relevant standards and/or the capacity of existing	Potentially significant	**MM UWS-2. Source Reduction and Solid Waste Management Plan (SRSWMP).** Applications for multifamily housing projects that are proposed on	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
waste disposal facilities serving the county, as well as impair the attainment of solid waste reduction goals.		County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include an SRSWMP describing proposals to reduce the amount of waste generated during construction and throughout the life of the project and enumerating the estimated reduction in solid waste disposed at each phase of project development and operation. **Requirements and Timing**: The plan shall include but not be limited to: • Operation Source Reduction: o A program to purchase materials that have recycled content for operation (e.g., office supplies) • Operation Solid Waste Reduction Examples: o An Applicant/owner-specified amount of square feet of space and/or bins for storage of recyclable materials within the project site OR within each unit. o Establish a recyclable material pickup area. o A green waste source reduction program, including the creation of lots and/or common composting areas, and the use of mulching mowers in all common open space lawns. o Implement a new curbside recycling program (may require the establishment of private pick-up depending on the availability of County-sponsored programs) or participate in an existing program to serve the new development. If P&D determines that a curbside recycling program cannot be implemented, and an alternative program is not online, then it will be the responsibility of the applicant/owner to contract with the Community Environmental Council or	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		some other recycling service acceptable to P&D to implement a project-wide recycling program. o Implement a backyard composting yard waste reduction program. The Applicant/owner shall submit an SRSWMP to the P&D permit processing staff for review and include the recycling and composting areas on building plans, as applicable. Program components shall be implemented prior to Final Building Clearance and maintained throughout the life of the project. **Monitoring:** During operation, the Applicant/owner shall demonstrate to P&D compliance staff as required that solid waste management components are established and implemented. The Applicant/owner shall demonstrate to P&D compliance staff that all required components of the approved SRSWMP are in place as required prior to Final Building Clearance.	
Cumulative Impacts	Potentially significant	**MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities)** would apply. **MM UWS-2 (Source Reduction and Solid Waste Management Plan [SRSWMP])** would apply.	Significant and unavoidable
Section 3.16, *Wildfire*			
Impact WF-1. The proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, or fire prevention techniques such as controlled burns.	Insignificant	No mitigation required.	Insignificant
Impact WF-2. The proposed Project would potentially exacerbate wildfire risks and could expose existing or future residents to pollutant concentrations and the uncontrolled spread of wildfire at several sites throughout the county, particularly within the WUI or in High/Very High FHSZs.	Potentially significant	**MM WF-1: Onsite Defensible Space Requirements.** Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall provide adequate defensible space onsite if the housing project is proposed within or adjacent to the High or Very High	Significant and unavoidable

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		FHSZs and/or WUI areas and must comply with the SBCFD's Defensible Space Standards. ~~(as determined appropriate by the SBCFD). Applicable projects shall provide a minimum 100-foot setback between habitable structures and wildland vegetation. A larger setback may be required if SBCFD determines that a greater distance is required for public and/or firefighter safety. All defensible space setback requirements shall be accommodated onsite to the extent feasible.~~ No offsite clearing of sensitive native vegetation shall be permitted unless deemed necessary by SBCFD for public and/or firefighter safety. **Requirements and Timing:** SBCFD shall apply the Defensible Space Standards for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law and are located within or adjacent to the High or Very High FHSZs and/or WUI areas. Application and approval of the Defensible Space Standards to qualifying projects by SBCFD shall be required before the issuance of grading or building permits.~~The County shall amend the zoning codes to include new setback requirements for applicable projects proposed in areas of the unincorporated county mapped within the WUI and/or High and Very High FHSZs. Revised setback requirements shall be developed in coordination with SBCFD to ensure applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law can accommodate adequate defensible space onsite and around habitable structures. Amendments to the zoning codes shall be implemented before the issuance of zoning	

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		~~permits for any applicable projects within the WUI and/or High and Very High FHSZs.~~ **Monitoring:** Applicable defensible space setback requirements shall be included in applicable project plans. County P&D compliance monitoring staff shall ensure compliance with project plans prior to Final Building Inspection Clearance.	
Impact WF-3. The proposed Project would potentially require the installation or maintenance of associated infrastructure (e.g., fuel breaks and emergency access roads) that may result in temporary or permanent impacts on the environment (e.g., vegetation clearing) and may exacerbate fire risk.	Potentially significant	**MM WF-1 (Onsite Defensible Space Requirements)** would apply.	Significant and unavoidable
Impact WF-4. The proposed Project would not substantially expose people or structures to significant post-wildfire risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Insignificant	No mitigation required.	Insignificant
Cumulative Impacts	Potentially significant	**MM WF-1 (Onsite Defensible Space Requirements)** would apply.	Significant and unavoidable

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List of Acronyms and Abbreviations

µg/m^3	micrograms per cubic meter
°C	degrees Celsius
°F	degrees Fahrenheit
3CE	Central Coast Community Energy
AAC	Agricultural Advisory Committee
AADT	annual average daily trips
AAI	All Appropriate Inquiry
AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing material
ACS	American Community Survey
ADA	Americans with Disabilities Act of 1990
ADT	Average Daily Trips
ADU	Accessory Dwelling Unit
AEO	Agricultural Enterprise Ordinance
AF	acre-feet
AFY	acre-feet per year
AIA	Airport Influence Areas
ALS	Advanced Life Support
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
ANCA	Airport Noise and Capacity Act
APAC	Agricultural Preserve Advisory Committee
APCD	air pollution control district
APN	Assessor Parcel Number
APS	Alternative Planning Strategy
AQAP	Air Quality Attainment Plan
AQMP	Air Quality Management Plan
ASCE	American Society of Civil Engineers
ASHRAE	American Society of Heating and Air-Conditioning Engineers
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
ATP	Active Transportation Plan
AVO	average vehicle occupancy
BAR	Board of Architectural Review
BGEPA	Bald and Golden Eagle Protection Act
BMP	Best Management Practice
BRT	bus rapid transit
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy

CAL FIRE	California Department of Forestry and Fire Protection
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Department of Conservation Geologic Energy Management Division Geologic Energy Management Division
CalGreen	California's Green Building Code
CalOES	California Office of Emergency Services
Cal-OSHA	California Division of Occupational Safety and Health
CalRecycle	California department of Resource Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CASGEM	California Statewide Groundwater Elevation Monitoring
CBC	California Building Code (California Code of Regulations, Title 24)
CBSC	California Building Standards Code
CBTP	community-based travel planning
CCAA	California Clean Air Act
CCC	California Coastal Commission
CCR	California Code of Regulations
CCVA	Climate Change Vulnerability Assessment
CCWA	Central Coast Water Authority
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CDP	Census-Designated Place
CDPR	California Department of Parks and Recreation
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESA	California Endangered Species Act
CFC	California Fire Code
CFD	Community Facilities District
CFR	Code of Federal Regulations
CH_4	methane
CHP	California Highway Patrol
CIP	Capital Improvement Program
CLUP	Coastal Land Use Plan
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Data Base
CNEL	community noise equivalent level

CNPPA	California Native Plant Protection Act
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COLT	City of Lompoc Transit
County	County of Santa Barbara
CPUC	California Public Utilities Commission
CRPR	California Rare Plant Rank
CSA	County Service Area
CSD	Community Services District
CTC	California Transportation Commission
CTSA	Consolidated Transportation Services Agency
CUPA	Certified Unified Program Agency
CVC	Critical Viewshed Corridor
CVRD	Cuyama Valley Recreation District
CVWD	Carpinteria Valley Water District
CWA	Clean Water Act
CWPP	Community Wildfire Protection Plan
cy	cubic yard
CZO	Coastal Zoning Ordinance
dB	decibel
dBA	A-Weighted Sound Level
DDD	Dichlorodiphenyldichloroethane
DDE	Dichlorodiphenyldichloroethylene
DDT	Dichlorodiphenyltrichloroethane
DIMF	Development Impact Mitigation Fee
DOF	Department of Finance
DOT	U.S. Department of Transportation
DPM	diesel particulate matter
DPR	Department of Pesticide Regulation
DPS	Distinct Population Segment
DR	Design Residential
DTSC	Department of Toxic Substances Control
DU	dwelling unit
du/ac	dwelling unit per acre
DWQ	Division of Water Quality
DWR	Department of Water Resources
E. coli	Escherichia coli
EAP	Energy Action Plan
EAS	Emergency Alert System
ECAP	Energy and Climate Action Plan
EDRN	Existing Developed Rural Neighborhood
EIR	Environmental Impact Report

EISA	Energy Independence and Security Act of 2007
EMFAC	EMission FACtors
EMP	Emergency Management Plan
EMS	Emergency Medical Services
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPR	Employer Participation Rate
ERF	Effective Response Force
ERM	emissions reduction measure
ERME	Environmental Resources Management Element
ESA	Environmental Site Assessment
ESH	Environmentally Sensitive Habitat
ESHA	Environmentally Sensitive Habitat Area
FAA	Federal Aviation Administration
FAR	floor area ratio
FBI	Federal Bureau of Investigation
FD	Fire District
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
Flood Control District	Control and Water Conservation District
FMMP	Farmland Monitoring and Mapping Program
FPD	Fire Protection District
FR	Federal Register
FRA	Federal Railroad Administration
FRAP	Fire and Resources Assessment Program
FTA	Federal Transit Administration
gal/hp/hr	gallons per horsepower per hour
GHG	greenhouse gas
GIS	Geographic Information System
GPAC	General Plan Advisory Committee
GPM	gallons per minute
GSA	groundwater sustainability agency
GSP	groundwater sustainability plan
Gt	gigatons
GWh	Gigawatt hour
GWP	Global Warming Potential
H_2S	hydrogen sulfide
HC	Highway Corridor
HCD	Housing and Community Development
HFC	hydrofluorocarbon
Highway	U.S. Highway

HMA	Housing Market Area
HOA	Homeowners' Association
HOV	high occupancy vehicle
HPP	Habitat Protection Plan
HQTC	High Quality Transit Corridor
HUD	U.S. Housing and Urban Development
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
IHO	Inclusionary Housing Ordinance
ILRP	Irrigated Lands Regulatory Program
IMS	Industrial Monitoring Stations
in/sec	inches per second
IPaC	Information, Planning, and Consultation
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Plan
IRWM	Integrated Regional Water Management
IRWMP	Integrated Regional Water Management Plan
IVPRD	Isla Vista Parks and Recreation District
JADU	junior accessory dwelling unit
JPA	joint powers authority
kHz	kilohertz
kW	kilowatt
kWh	kilowatt-hour
LAFCO	Local Agency Formation Commission
LAMP	Local Agency Management Program
LBP	lead-based paint
LCP	Local Coastal Program
L_{dn}	Day-Night Average Noise Level
L_{eq}	Equivalent Noise Level
LESA	Land Evaluation and Site Assessment
LHMP	Local Hazard Mitigation Plan
L_{max}	Maximum Instantaneous Noise Level
L_{min}	Minimum Instantaneous Noise Level
LOS	level of service
LPNF	Los Padres National Forest
LRA	Local Responsibility Area
LSAA	Lake and Streambed Alteration Agreement
LUDC	Land Use and Development Code
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MFD	Multifamily Dwelling
mg/m^3	milligram per cubic meter
MGD	million gallons per day
MHFP	Santa Barbara County Operational Area Multi-Hazard Functional Plan
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan

MLUDC	Montecito Land Use and Development Code
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
mpg	mile per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MT	metric ton
MTD	Metropolitan Transit District
MW	megawatt
N/A	Not Applicable
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NCTS	New Cuyama Transfer Station
NEM	Noise Exposure Map
NFPA	National Fire Protection Association
NHTSA	National Highway Traffic Safety Administration
NIDIS	National Integrated Drought Information system
NMFS	National Marine Fisheries Service
NO	nitric oxide
NO_2	nitrogen dioxide
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Administration
NOD	Notice of Determination
NOP	Notice of Preparation
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NWI	National Wetland Inventory
O_3	ozone
OD	origin-destination
OHWM	ordinary high water mark
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OWTS	Onsite Wastewater Treatment Systems
P&D	Planning and Development Department
Pb	lead
PCB	polychlorinated biphenyl
PFC	perfluorocarbon
PG&E	Pacific Gas and Electric Company
PIC	pilot in command
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter

Potential Rezone Program	Program 1 of the Housing Element Update
ppb	parts per billion
pph	persons per household
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRD	Planned Residential Development
Project	Housing Element Update
PRT	parks, recreation, and trails
PV	photovoltaic
RCRA	Resource Conservation and Recovery Act
RCRIS	Resource Conservation and Recovery Act Information System
RdMAP	Road Maintenance Annual Plan
ReadySBC	Ready Santa Barbara County
REC	Recognized Environmental Condition
RFS	Renewable Fuels Standard
RHNA	Regional Housing Needs Assessment
RMS	root mean square
ROC	reactive organic compound
ROG	reactive organic gases
RPS	Renewable Portfolio Standard
RRWMD	Resource Recycling and Waste Management Division
RTDM	Regional Transportation Demand Model
RTP	Regional Transportation Plan
RV	Recreational Vehicle
RWMP	Regional Wildfire Mitigation Program
RWQCB	Regional Water Quality Control Board
SAF	State Alternative Fuels
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SBCAG	Santa Barbara County Association of Governments
SBCAPCD	Santa Barbara County Air Pollution Control District
SBCFCWCD	Santa Barbara County Flood Control and Water conservation District
SBCFD	Santa Barbara County Fire Department
SBCOEM	Santa Barbara County Office of Emergency Management
SBCWA	Santa Barbara County Water Agency
SCAQMD	South Coast Air Quality Management District
SCCAB	South Central Coast Air Basin
SCE	Southern California Edison
SCRTS	South Coast Recycling and Transfer Station
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SEMS	Standardized Emergency Management System
sf	square foot
SF_6	sulfur hexafluoride

SFD	Single-Family Dwelling
SGMA	Sustainable Groundwater Management Act
SHMP	State of California Multi-Hazard Mitigation Plan
SIP	state implementation plan
SLAMS	State and Local Air Monitoring Station
SLORTA	San Luis Obispo Regional Transit Authority
SMARA	California Surface Mining and Reclamation Act
SMOOTH	Santa Maria Organization of Transportation Helpers
SMRT	Santa Maria Regional Transit
SO_2	sulfur dioxide
SOC	Statement of Overriding Considerations
SoCalGas	Southern California Gas Company
SOP	Standard Operating Procedure
SPCC	spill prevention, control, and countermeasure
SR	State Route
SRA	state responsibility area
SRSWMP	Source Reduction and Solid Waste Management Plan
STIP	State Transportation Improvement Program
SWMP	Solid Waste Management Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plans
SWRCB	State Water Resources Control Board
SWRP	Integrated Stormwater Resource Plan
SWTR	Surface Water Treatment Rule
SYVRTS	Santa Ynez Valley Recycling and Transfer Station
SYVT	Santa Ynez Valley Transit
TAC	toxic air contaminant
TAZ	traffic analysis zone
TDM	transportation demand management
TIP	Transportation Improvement Plan
TMDL	Total Maximum Daily Load
TPA	transit priority area
tpd	tons per day
TPP	Tree Protection Plan
tpy	tons per year
TRIS	Toxic Release Inventory System
TTD	Telecommunications Device for the Deaf
TTY	TeleTYpe
U.S.	United States
UCSB	University of California, Santa Barbara
USACE	U.S. Army Corps of Engineers
USAR	Urban Search and Rescue
USC	United States Code
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency

USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USNAS	U.S. National Academy of Sciences
UST	underground storage tank
UV-B	ultraviolet rays (harmful)
UWMP	Urban Water Management Plan
UWMPA	Urban Water Management Planning Act
VCTC	Ventura County Transportation Commission
VdB	vibration velocity
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	vehicle miles traveled
VOC	volatile organic compound
VSFB	Vandenberg Space Force Base
VTS	Ventucopa Transfer Station
WEA	Wireless Emergency Alerts
WEF	Water Environment Federation
WSA	Water Supply Assessment
WUI	Wildland Urban Interface
WWTP	wastewater treatment plant
ZEV	zero-emission vehicle

Chapter 1
Introduction

1.1 Project Overview

The County of Santa Barbara (County) prepared this Program Environmental Impact Report (Program EIR) to evaluate the potential environmental impacts that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project). The County prepared this Program EIR in compliance with the California Environmental Quality Act (CEQA) statutes under Public Resources Code (PRC) Sections 21000-21189.57 and the CEQA Guidelines under the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Sections 15000-15387. CEQA requires state and local agencies to identify the potentially significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible.

Housing elements are one of the mandatory general plan elements and provide policies and programs to ensure the provision of a quantity and diversity of housing types that meet the housing needs for the planning period.

Since 1971, state law has required all local governments (i.e., cities and counties) to adopt a general plan. A general plan is an essential planning tool that addresses land use, community development, safety, resource management and conservation, and infrastructure, and expresses the community's development goals related to the local government's current and future land uses. Providing adequate housing that meets the needs of all community members is a key requirement of general plans. California's local governments meet this requirement by adopting a housing element as part of their general plans. Government Code Section 65583 describes the content and process by which a housing element must be prepared. Among other requirements, housing elements must identify, analyze, and make adequate provisions for the existing and projected housing needs of all economic segments of the community. (See Section 1.1.1*, Housing Element Update Requirements*.)

The County's Housing Element is a mandatory component of the County's Comprehensive Plan (i.e., general plan). The Housing Element Update assesses current and projected housing needs in the unincorporated areas of Santa Barbara County and provides an inventory of sites available for residential development to meet housing needs. Governmental, non-governmental, environmental, and physical constraints to housing production are assessed and the Housing Element Update provides goals, policies, and programs to overcome these barriers and support housing production consistent with state law. Government Code Sections 65580-65589.8 require that local agencies update the housing element every eight years.

In February 2023, the County's previous 8-year housing cycle (2015-2023) concluded. As a result, the County's Housing Element Update pertains to the 6th Cycle 2023-2031 housing planning period. The Housing Element Update must be adopted locally and certified by the California Department of Housing and Community Development (State HCD).

1.1.1 Housing Element Update Requirements

In compliance with state law, the County's Housing Element, Update includes the following required components:



- A progress review of the prior goals, policies, and programs from the previous housing cycle;
- A detailed analysis of existing and projected housing needs, including any special housing needs, supported by demographic, economic, and housing characteristics;
- An assessment of fair housing issues, including actions to affirmatively further fair housing;
- A comprehensive analysis of the actual and potential constraints to producing and preserving housing, including both governmental and non-governmental constraints;
- A sites inventory listing adequately zoned sites that could accommodate new housing, to determine the County's ability to meet the Regional Housing Needs Allocation (RHNA) and affordability requirements. If the sites inventory finds there are insufficient sites and capacity to meet the RHNA (i.e., a "shortfall"), then the Housing Element Update is required to include a rezoning program to create the required capacity; and
- A housing plan comprising goals, objectives, and policies to meet housing needs with comprehensive programs to achieve the goals and policies.

The RHNA process is described further in Section 2.1.2, *Regional Housing Needs Allocation Process*. Additionally, the Housing Element Update, including housing goals, policies, and programs as well as the sites inventory and Potential Rezone Program included as part of Program 1, are described further in Section 2.3.2, *Project Components*.

1.1.2 Summary of Planning Process and Public Outreach

Since December 2021, the County has conducted a range of public outreach events, including 1) public workshops and hearings; 2) community forums; 3) focus group meetings; and 4) pop-up events to inform the development of the Housing Element Update. All presentation materials were provided on the project websites and the Planning & Development Department's (P&D's) YouTube page. County staff directly held or participated in three community workshops and forums, multiple public hearings, numerous stakeholder meetings and targeted presentations, and two pop-up events. The Promotores Network also promoted the Housing Element Update activities at other in-person community events to foster input from disadvantaged and hard-to-reach communities. These efforts informed the public about: 1) the Housing Element Update's purpose; 2) the update process; and 3)

the context for the County's housing needs. Public outreach also provided opportunities for County staff to gather input on housing goals and policies and hear community concerns. The public outreach process has been ongoing through November 2023.

In addition to the aforementioned public input opportunities, County staff prepared and conducted a "Housing Conditions and Housing/Environmental Needs" survey in collaboration with the Environmental Justice Element planning effort and the Santa Barbara County Promotores Network. Unincorporated county residents and housing stakeholders were asked to complete the survey at outreach events, through online engagement, and by going door-to-door in unincorporated communities to help identify housing issues and solutions. The survey was advertised and promoted in-person at local community events and online via the Housing Element Update websites, email notifications, and social media outlets.

Consistent with Government Code Section 65585(b)(1), the County released the Draft 2023-2031 Housing Element Update for public comment for 30 days starting on January 30, 2023. The public comment process resulted in several changes to the County's Draft Housing Element Update, including developing several new programs and adding nine County-owned sites to the sites inventory. The County spent more than the required 10 business days considering and incorporating public comments into the revised Draft Housing Element Update. The County submitted the revised draft Housing Element Update to State HCD on March 31, 2023. Additionally, the County submitted to State HCD two sets of minor technical edits to specific sections of the draft Housing Element Update. On October 16, 2023, State HCD notified the County that the final draft Housing Element substantially complies with state housing element law The County Board of Supervisors adopted the final Housing Element Update on December 5, 2023.

1.2 Purpose of the Program EIR and Legal Authority

CEQA was enacted in 1970 by the California legislature to disclose to decision-makers and the public the significant environmental effects of proposed activities, including ways to avoid or reduce those effects by requiring the implementation of feasible alternatives or mitigation measures. CEQA applies to all California government agencies, including local agencies when making certain legislative acts and processing discretionary permits or other discretionary approvals for projects proposed by private applicants. As such, the County is required to undertake the CEQA process before deciding on a project. In accordance with PRC Section 21067 and CEQA Guidelines Sections 15367 and 15050 through 15053, the County is the Lead Agency with authority and primary responsibility to perform the environmental review, including certification of a Program EIR.

The CEQA statutes (PRC Section 21000 et seq.) and the CEQA Guidelines (CCR, Title 14, Section 15000 et seq.) codify the process and contents for the preparation of an EIR. The County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970,* which includes the County's *Environmental Thresholds and Guidelines Manual,* revised in 2021, provide definitions, procedures, and forms to implement CEQA and supplement the CEQA Guidelines for specific operations of the County (County of Santa Barbara 2021).

The basic purposes of CEQA include (14 CCR Section 15002[a]):

1. Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;

2. Identify ways that environmental damage can be avoided or significantly reduced;
3. Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

While CEQA Guidelines Section 15021(a) requires that consideration be given to avoiding environmental damage, the Lead Agency (i.e., County) and other responsible public agencies must balance adverse environmental effects against other public objectives, including social and economic goals, in determining whether and in what manner a project should be approved.

The purpose of this Program EIR is to inform public agencies, decision-makers, and the public about the significant environmental impacts that would potentially result from the implementation of the Housing Element Update.

The Program EIR impact analysis is conducted relative to the existing environmental conditions and regulatory setting of the unincorporated county. Based on this analysis, the Program EIR sets forth the analysis of potential impacts, evaluates reasonable alternatives, and sets forth mitigation measures that would avoid or reduce the potentially significant effects that could result from implementation of the Housing Element Update.

1.3 Program-Level EIR Analysis

This Program EIR is prepared pursuant to CEQA Guidelines Section 15168. The CEQA Guidelines clarify that a program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

A program-level analysis for the proposed Project is appropriate in this EIR due to the following:

- Site-specific development and land use details for all potential future housing development projects are not available at this time, and the type, location, and intensity of future housing development activities are reasonably expected to evolve.
- The proposed Project covers a defined geographic area with regional subareas (i.e., Housing Market Areas [HMAs]) with similar land use characteristics (Chapter 2, *Project Description*).
- A program-level analysis provides the County with the opportunity to consider "broad policy alternatives and program-wide mitigation measures earlier in the planning process when the agency has greater flexibility to deal with basic problems or cumulative impacts" (CEQA Guidelines Section 15168[b][4]).

As a program-level EIR, the level of detail included in the project description and methodology for impact analysis is more general than a project-level EIR, as an individual development project and site-level details are not available for the unknown number of future permit applications occurring in the unincorporated county, rendering some analyses too speculative for detailed evaluation. Further, this Program EIR does not focus on any specific projects that may be implemented pursuant to the Housing Element Update. Instead, the analysis is informed by the sites inventory prepared by the County to estimate the total housing that could occur under the proposed Project, including the Potential Rezone Program, during the current 8-year housing cycle (2023-2031). This approach allows the County Board of Supervisors to consider broad implications and impacts associated with the proposed Project while not requiring a detailed evaluation of individual properties.

Given this Program EIR does not include the level of detail necessary to qualify as a project-level EIR, the County anticipates that future projects may require more detailed environmental review pursuant to CEQA during the County permit process. In accordance with CEQA Guidelines Section 15168, the programmatic analysis and findings of this Program EIR may be incorporated by reference in subsequent environmental documents to describe regional settings, general effects, cumulative impacts, and other factors that may apply to individual housing development projects that implement the Housing Element Update. If a subsequent activity is within the scope of this Program EIR and no new effects would occur or no new mitigation measures would be required, additional environmental documents may not be required if this Program EIR adequately addresses the impacts of the subsequent activity pursuant to CEQA Guidelines Section 15168(c). When a program-level EIR is relied upon for a subsequent activity, the Lead Agency must incorporate applicable mitigation measures and alternatives developed in the program-level EIR into subsequent CEQA documentation (CEQA Guidelines Section 15168[c][3]). If a subsequent activity exceeds the scope of the proposed Project (e.g., building height and density) analyzed in this Program EIR and/or would have effects that are not identified in the Program EIR, the additional project-level environmental review would be required before the approval of the future project, as applicable.

The County Board of Supervisors adopted the Housing Element Update on December 5, 2023. Adoption of the Housing Element Update is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3), the "common sense exemption." This exemption does not affect or apply to the findings of this Program EIR or the scope of the environmental impact analysis described below.

1.4 Scope of Program EIR Analysis

This Program EIR assesses the potential environmental impacts that could occur with the implementation of the proposed Project. The Program EIR evaluates potentially significant environmental impacts, including issues raised in public comments received in response to the Notice of Preparation (NOP) and at public workshops/hearings (Appendix A). This scoping process determined that the Program EIR should analyze the following issues (Chapter 3, *Environmental Impact Analysis*):

- Aesthetics and Visual Resources
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Greenhouse Gas Emissions

- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Utilities and Water Supply
- Wildfire

This Program EIR addresses the issues referenced above and identifies potential environmental impacts associated with the proposed Project, in accordance with the provisions of CEQA, the CEQA Guidelines, and the County's *Environmental Thresholds and Guidelines Manual* (2021). This Program EIR recommends feasible mitigation measures where necessary that would reduce or eliminate adverse environmental effects. In accordance with CEQA Guidelines Section 15128 (Effects Not Found to Be Significant), environmental impacts related to Forestry, Geology and Soils, and Mineral Resources would be insignificant; therefore, these resources are addressed in Chapter 5, *Other CEQA Considerations*.

1.5 Agencies and Roles

The Program EIR process for the proposed Project involves the following interested agencies, as specified in the CEQA Guidelines:

Table 1-1. Agencies and Roles

Lead Agency	The County is the Lead Agency as it is the agency with principal responsibility for implementing the proposed Project (CEQA Guidelines Section 15367).
Responsible Agencies	Additional agencies with approval authority over aspects of the proposed Project include the California Coastal Commission (CEQA Guidelines Section 15381).
Trustee Agencies	State agencies with general management authority over specified natural resources of the State of California when the resources may occur within the Project area, including the California Department of Fish and Wildlife (CDFW) and the California Department of Parks and Recreation (CDPR) (CEQA Guidelines Section 15386).
Other Interested Agencies	Additional agencies that may be interested in the proposed Project and its impacts may include the county's eight incorporated cities (Santa Barbara, Carpinteria, Goleta, Buellton, Solvang, Lompoc, Santa Maria, and Guadalupe), Santa Barbara County Air Pollution Control District (SBCAPCD), California Department of Forestry and Fire Protection (CAL FIRE), State Water Resources Control Board (SWRCB), Central Coast Regional Water Quality Control Board (RWQCB), Native American Heritage Commission (NAHC), California Department of Transportation (Caltrans), and Santa Barbara County Public School Districts listed in Section 3.12, *Public Services and Recreation*, and Water Districts listed in 3.15, *Utilities and Water Supply*.

1.6 Environmental Review Process

The Program EIR process for the proposed Project consists of the following steps, as specified in the CEQA Guidelines:

Table 1-2. Environmental Review Process

Notice of Preparation (NOP) / Public Scoping Hearing	The County issued an NOP on July 21, 2022, and a revised NOP on August 11, 2022, to request comments on the scope of the Program EIR. The NOP was published online and circulated to relevant agencies, community organizations, and interested individuals. The NOP was also posted in the County Clerk's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Planning and Research (OPR) to solicit statewide agency participation in determining the scope of the Program EIR. A virtual public scoping meeting was held via Zoom on August 25, 2022. The 30-day public comment period closed on September 9, 2022. Appendix A contains the NOP and comments and input received during the review period which was considered in preparing the scope of this Program EIR (CEQA Guidelines Section 15082).
Draft Program EIR and Public Review Period	The County prepared and distributed a Notice of Availability (NOA) for the Draft Program EIR to relevant agencies and interested parties on December 21, 2023. The NOA provides notice of a minimum 52-day public review and comment period for the Draft Program EIR, from December 20, 2023 to February 9, 2024, and the Draft Program EIR is made available on the County's website: https://www.countyofsb.org/3177/Housing-Element-Update and at both the County P&D office locations (CEQA Guidelines Section 15087). During this public review period, the County hosted two public hearings to present the Project and Draft Program EIR findings to the public and solicit comments. This included a meeting on January 17, 2024 at the P&D conference room at 624 W. Foster Road, Santa Maria, and a meeting on January 23, 2024 at the County Planning Commission Hearing Room at 105 E. Anapamu Street, Santa Barbara.
Final Program EIR	The County has prepared this~~will prepare a~~ Final Program EIR, which includes the Draft Program EIR with any necessary revisions, public comments received on the Draft Program EIR, a list of persons and entities who commented, and written responses to public comments submitted during the Draft Program EIR public review period. In total, 110 written comment letters and 14 oral comments were received from agencies, non-governmental organizations, community groups, and the public on the Draft EIR. The Final Program EIR will be available to public agencies at least 10 days before the public hearing when the County Planning Commission considers recommendations regarding the Final Program EIR, and the County Board of Supervisors considers certifying the Final Program EIR. The Final Program EIR will be available for public review on the County's websites: https://www.countyofsb.org/3177/Housing-Element-Update and at both the County P&D office locations (CEQA Guidelines Section 15089).
Program EIR Certification, Findings, and Statement of Overriding Considerations	The County will certify that the Final Program EIR is completed in compliance with CEQA. According to PRC Section 21081, when the Program EIR identifies significant environmental impacts that may result from a project, the lead agency's decision-making body must make specific findings and adopt a Statement of Overriding Considerations (SOC). The SOC must provide specific reasons in writing why the decision makers have determined that the benefits of the project make its unavoidable adverse environmental impacts acceptable (CEQA Guidelines Sections 15091-15093).

Table 1-2. Environmental Review Process (Continued)

Mitigation Monitoring and Reporting Program (MMRP)	The County will adopt an MMRP for mitigation measures that are part of Project implementation (CEQA Guidelines Section 15097).
Notice of Determination (NOD)	The County will file an NOD with the State Clearinghouse within five working days of the agency's action on the Program EIR (CEQA Guidelines Section 15094).

1.7 Areas of Known Public Controversy

CEQA requires that an EIR identify areas of controversy known to the lead agency, including issues that the lead agency and/or the public raise (CEQA Guidelines Section 15123). Based on County public hearings, community outreach performed as part of the Housing Element Update process, the NOP scoping meetings, and public comment letters received on the NOP and Draft Housing Element Update (Appendix A), the following environmental issues are known to be of concern and may be controversial. Each issue is further discussed in this Program EIR.

- Concerns regarding the loss of agricultural resources and land uses;
- Compatibility issues with established residential communities;
- Compatibility issues with noise-sensitive land uses;
- Concerns about inadequate water supply and increased demands;
- Concerns of increased traffic congestion;
- Changes to aesthetics and views;
- Concerns about the loss of recreation and open space and increased need for parkland;
- Concerns about wildfire hazards;
- Concerns regarding the loss of sensitive biological habitat;
- Public services and demand issues;
- Degradation of the natural environment; and
- Cumulative impacts, such as changes in the character of communities and rural areas.

1.8 Program EIR Contents and Document Organization

The content and organization of this Program EIR are designed to meet the current requirements of CEQA, as well as the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970*. The required Program EIR sections are referenced along with the contents below to demonstrate compliance with CEQA.

Executive Summary (CEQA Guidelines Section 15123) presents a summary of the proposed Project and alternatives, potential impacts and mitigation measures, and impact conclusions regarding growth inducement and cumulative impacts.

Table of Contents (CEQA Guidelines Section 15122) provides a list of the contents included within the Program EIR.

Chapter 1, Introduction, provides an overview of the EIR process, describes the purpose and scope of this Program EIR, and outlines required EIR contents and the organization of the Program EIR.

Chapter 2, Project Description (CEQA Guidelines Section 15124), describes the Project area, the Project Objectives, and the details of the Housing Element Update's implementation as a basis for the environmental impact analysis.

Chapter 3, Environmental Impact Analysis and Cumulative Project Scenario (CEQA Guidelines Sections 15125, 15126.2, 15126.4, 15128, and 15130), describes the existing environmental conditions and regulatory framework for each environmental resource area, methods and assumptions used in the impact analysis, criteria for determining significance, impacts that would result from the proposed Project, and feasible mitigation measures that would eliminate or reduce significant impacts. "Cumulative Impacts" (CEQA Guidelines Section 15130) are also discussed, which describe impacts that could occur from the combined effect of the proposed Project with other past, present, and reasonably foreseeable future projects. For each significant adverse impact identified, mitigation measures are presented where feasible to reduce the impacts to acceptable levels. "Residual Impacts" identify impact categories after mitigation is applied; in those instances, where mitigation measures cannot reduce adverse impacts to *insignificant* levels, impacts are categorized as *significant and unavoidable*.

Chapter 4, Alternatives Analysis (CEQA Guidelines Section 15126.6), evaluates the environmental effects of five alternatives relative to the proposed Project, including the required No Project Alternative. It also identifies the environmentally superior alternative.

Chapter 5, Other CEQA (CEQA Guidelines Section 15126.2), identifies insignificant issues areas, as well as secondary impacts, potential growth-inducement, and significant and unavoidable effects.

Chapter 6, List of Preparers (CEQA Guidelines Section 15129), identifies the individuals and/or organizations involved in preparing this Program EIR.

Chapter 7, References (CEQA Guidelines Section 15129), identifies the documents (printed and website references) and individuals (personal communications) consulted during the preparation of this Program EIR.

Chapter 8, Mitigation Monitoring and Reporting Program (MMRP) (CEQA Guidelines Section 15091), provides a program for reporting on or monitoring the changes and measures that are required as part of the proposed Project's adoption to avoid or substantially lessen significant environmental effects.

Chapter 9, Response to Comments (CEQA Guidelines Section 15088), provides a copy of and written responses to all written and oral comments received from agencies, non-governmental organizations, community groups, and the public on the Draft Program EIR.

Technical Appendices provide information and technical studies that support the environmental analysis set forth in this Program EIR and include the NOP and responses to the NOP (Appendix A), the sites inventory analysis to support the Program EIR (Appendix B), and supporting technical information/studies.

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Chapter 2
Project Description

2.1 Introduction

State housing law requires the County of Santa Barbara (County) to implement an adopted 2023-2031 Housing Element Update (Housing Element Update; Project). This chapter of the Program Environmental Impact Report (EIR) describes the proposed Project, including 1) the background related to the proposed Project; 2) the location and boundaries of the "planning area";[1] 3) the goals and objectives of the proposed Project; 4) the individual components (i.e., sites inventory and capacity discussion) and associated policies and programs comprising the proposed Project; and 5) required actions and approvals associated with the proposed Project. The purpose of this chapter is to identify the components and timing of implementation of the proposed Project to inform the programmatic review of potential environmental impacts per the California Environmental Quality Act (CEQA) under Public Resources Code (PRC) Sections 21000-21189.57 and the CEQA Guidelines under the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Sections 15000-15387.

2.1.1 Background

As described in Section 1.1.1, *Housing Element Update Requirements*, to comply with state housing law (Government Code Section 65583) a housing element must identify and analyze existing and projected housing needs, as well as include a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. A housing element must identify adequate sites for housing for the current housing element cycle's assigned local Regional Housing Needs Allocation (RHNA) and rezone appropriate sites if available lands are insufficient to accommodate the RHNA.

2.1.2 Regional Housing Needs Allocation Process

The RHNA is a state-mandated process that determines how many new housing units and the affordability of those housing units each local government must plan for in its housing element. State law requires local agencies to plan for the RHNA; however, the RHNA does not approve any housing development and is not a prediction of building permits, construction, or housing activity. Further, the RHNA is not limited to existing land use capacity or growth controls if rezoning is necessary to accommodate the housing need. The RHNA requires communities to anticipate and plan for projected growth and demonstrate to the State Department of Housing and Community Development (State HCD) that there are sufficient sites zoned to accommodate this number of new dwelling units. The RHNA enables communities to anticipate growth so that collectively the region can grow in ways that enhance the quality of life, improve access to jobs, promote transportation mobility, and address fair share housing needs.

[1] The "planning area" is comprised of the unincorporated areas of the county affected by the Housing Element Update, as well as selected County-owned properties in the City of Santa Barbara. (See also, Section 2.2, *Project Location.*)

Each update to a housing element begins when State HCD issues a Regional Housing Need Determination for the upcoming housing element planning period. The determination includes an overall housing need (number of housing units) and a breakdown of the need into four income levels (i.e., very low-, low-, moderate- and above moderate-income). Each regional planning agency in the state then adopts a methodology for allocating a portion of the determination to local governments in the region and publishes an associated RHNA plan. The Santa Barbara County Association of Governments (SBCAG) is the regional planning agency for Santa Barbara County, comprising the County and all eight cities in the county.

In December 2019, SBCAG initiated a process to distribute the 6th Cycle 2023-2031 RHNA as determined by State HCD among the unincorporated areas of the county and the eight incorporated cities (i.e., Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, and Solvang) (SBCAG 2021). County staff took an active role in the process. Initial activities included completing SBCAG's RHNA planning factors survey. County staff also attended five RHNA Project Development Team meetings. These meetings focused on seven scenarios and several methodologies for distributing the RHNA. Key factors included vacancy rate, cost burden, and overcrowding.

In January 2021, State HCD determined that all jurisdictions in Santa Barbara County must accommodate 24,856 new housing units in the 2023-2031 planning period. The SBCAG RHNA Plan 6th Cycle 2023-2031 (SBCAG RHNA Plan) specifies that the County's share of the RHNA totals 5,664 units (SBCAG 2021). The SBCAG RHNA Plan allocates nearly three-quarters of the County's RHNA to the South Coast, which offers ample jobs but lacks sufficient affordable housing (i.e., jobs-to-housing imbalance) to ensure compliance with SBCAG's Connected 2050 Regional Transportation Plan/Sustainable Communities Strategy (Connected 2050 RTP/SCS) (Table 2-1).

Table 2-1. 6th Cycle RHNA for the County of Santa Barbara

Sub-Region	Total RHNA	RHNA by Income Level (Housing Units)			
		Very Low	Low	Moderate	Above Moderate
South Coast	4,142	809	957	1,051	1,325
North County	1,522	564	243	229	486
Total	**5,664**	**1,373**	**1,200**	**1,280**	**1,811**

2.1.3 Existing State and County Housing Programs

The Housing Element Update is highly regulated by state housing element law and State HCD guidelines. To address a statewide housing crisis, there have been substantial changes to state housing law since the County's 5th Cycle 2015-2023 Housing Element was prepared that are aimed at stimulating housing development and limiting the discretion of local agencies. Further, the County has existing housing programs that support the local provision of adequate housing in unincorporated areas. This section provides brief descriptions of key applicable laws, policies, and programs that relate to the proposed Project, but this list is not inclusive of all state housing laws or County plans and policies.

Local Housing Capacity and Sites Inventory

Under state housing law (Government Code Section 65583), the County is required to provide capacity in unincorporated communities to accommodate the RHNA using various land use planning strategies during the 8-year housing element planning period. The County, however, is not required

to physically construct the RHNA housing units. Rather, the County must provide capacity for housing through local zoning regulations and development standards and the elimination of regulatory barriers. Rezoning is required only if existing zoning cannot fully accommodate the RHNA during the planning cycle. Section 2.3, *Housing Element Update*, describes the Project components in detail, including the types of sites the County utilized to determine the capacity to meet its RHNA (i.e., vacant sites, ADUs, pending projects, potential County-owned sites, and potential rezone sites). As described further therein, the sites inventory, which shows, in part, the number of housing units that could result from the County's housing capacity, identifies all vacant and non-vacant sites in the unincorporated areas of Santa Barbara County that would be able to accommodate housing development during the 2023-2031 planning period under existing zoning and potential rezoning.[2] As noted above, future housing units may include ADUs and junior accessory dwelling units (JADUs), which are exempt from CEQA and discretionary permits per Government Code Sections 65852.2 and 65852.22, which could be constructed along with existing or future primary single-family dwellings (SFDs) and multifamily dwellings (MFDs).

No Net Loss Buffer

The No Net Loss law (Government Code Section 65863; Senate Bill [SB] 166) requires adequate housing sites to be maintained at all times throughout the planning period to accommodate the remaining RHNA target by each income category. State guidance on the implementation of the No Net Loss law recommends that jurisdictions create a buffer in the sites inventory of at least 15 percent to 30 percent more housing capacity than required, particularly for lower-income allocations. This ensures that adequate capacity is provided throughout the planning period even if housing sites are constructed with fewer units than projected in the Housing Element Update. That is, if the County approves a development on a parcel listed in the sites inventory that will have fewer units than the number of units anticipated in the site inventory, either in total or at a specified income level, then the jurisdiction must verify the remaining capacity can accommodate additional units or identify and make available through mid-cycle rezones, if necessary, sufficient sites to accommodate the remaining unmet RHNA target for each income category. Building in a capacity buffer helps prevent the need for further rezoning and/or updates to the Housing Element Update during the 8-year planning period, as well as related environmental review.

State Density Bonus Law

State Density Bonus Law (SDBL; Government Code Sections 65915-65918) is a tool that incentivizes the construction of affordable housing by allowing a developer to add additional housing units to a project beyond the locally zoned capacity and secure other incentives and/or concessions in exchange for a commitment from the developer to include deed-restricted affordable units in the project. Density bonus offers a path and incentives for developers to build more residential units than would otherwise by allowed by the zoning ordinance to construct housing affordable to very low-income,

[2] For the purposes of the Housing Element Update, the sites inventory includes the number of housing units that will result from the County's existing housing capacity: 1) vacant sites, 2) projected ADUs, and 3) pending projects. The Housing Element Update further identifies that the County will rely on potential rezone sites and potential County-owned sites to accommodate its shortfall of units in the lower- and moderate-income affordability levels based on the sites inventory. (See Appendix D of the Housing Element Update for details about the sites inventory.) For the purposes of this Program EIR, the sites inventory refers to all of the types of housing sites the County may utilize to meet its RHNA: 1) vacant sites (under existing zoning), 2) projected ADUs, 3) pending projects, 4) potential County-owned sites, and 5) potential rezone sites.

low-income, senior, and other qualifying households. Under SDBL, developments that create five or more dwelling units are eligible for a density bonus if a specified percentage of units are provided at specific affordable rents or sale prices. When a developer meets the requirements of SDBL, the County is obligated to permit increased building density, grant incentives, and waive any conflicting local development standards (e.g., height limits, parking requirements) unless certain limited exceptions apply.

On September 28, 2016, Governor Brown signed four assembly bills amending the SDBL. These bills went into effect on January 1, 2017, and include the following key changes:

- AB 2442 – Expands density bonus eligibility to include housing developments for transitional foster youth, disabled veterans, and homeless individuals;
- AB 2556 – Clarifies the requirements regarding the replacement of affordable units;
- AB 2501 – Streamlines the permit process for density bonus projects and clarifies regulations related to defining, calculating, and granting density bonuses; and
- AB 1934 – Grants density bonuses for commercial developers who partner with affordable housing developers and agree to provide affordable housing units as part of a commercial project.

The County's zoning ordinances offer density bonuses, incentives, and/or concessions for eligible affordable and senior housing projects and childcare facilities. These zoning ordinance provisions are intended to implement the state-mandated Density Bonus Program (Government Code Sections 65915-65918). The County last updated its density bonus provisions in 2019. SDBL has been amended several times since 2019, warranting additional revisions to the County's ordinance implementing the SDBL provisions.

Key Residential and Mixed Use Zoning Districts

The County's zoning ordinances include two key residential zones that allow mixed housing types including SFDs, MFDs, and certain other types of housing – Design Residential (DR) and Planned Residential Development (PRD). The County applies these zones to support efficient, well-planned residential development and ensure high-quality public services and facilities. Both zoning districts encourage clustering of development to protect onsite resources. The DR zone is applied to areas appropriate for one-family, two-family, and multifamily dwellings. As stated in the County's zoning ordinances, this zone is intended to ensure comprehensively planned and well-designed residential development while allowing flexibility and encouraging innovation and diverse design and requiring that substantial open space (i.e., 40 percent of the site) be maintained within new residential developments. DR developments are common in Goleta, Orcutt, and Vandenberg Village/Mission Hills. The PRD zone ensures comprehensively planned development of large acreage within Urban Areas as designated on the Comprehensive Plan maps that are intended primarily for residential use. As stated in the County's zoning ordinances, the intent of this zone is to 1) promote flexibility and innovative design of residential development, provide desirable aesthetic and efficient use of space, and to preserve significant natural, scenic, and cultural resources of a site, 2) encourage clustering of structures to preserve a maximum amount of open space (i.e., 40 percent), 3) allow for diversity of housing types, and 4) provide recreational opportunities for use by both the residents of the site and the public. In addition, mixed use development is a permitted use in the Limited Commercial (C-1) and Community Mixed Use – Los Alamos (CM-LA) commercial zones. Mixed use development is also

allowed in the Retail Commercial (C-2), General Commercial (C-3), and Professional and Institutional (PI) commercial zones with a Minor Conditional Use Permit (MCUP).

Inclusionary Housing Ordinance

The County implements an Inclusionary Housing Ordinance (IHO), Chapter 46A of the County Code. The IHO requires for-sale residential projects creating five or more units or subdivisions creating five or more lots to construct a certain number of affordable housing units on the site or pay fees in lieu of constructing the affordable dwellings. When in-lieu fees are paid, they are incorporated into the County's Housing Trust Fund and are used to help finance the development of affordable rental housing for very low- and low-income households. The IHO may require the provision of up to 15 percent affordable units within proposed residential subdivisions of 20 units or greater and one moderate-income unit within projects with 5 to 19 units.

Accessory Dwelling Units Ordinance

In addition to statewide guidance (Government Code Section 65852.2), local agencies are permitted to add development restrictions and standards where the state law is silent. Given increased popularity and changing housing needs, regulations regarding ADUs and JADUs have been altered in the past year. The new regulations are substantially different (and more accessible) from the previous regulations, and include a streamlined permitting process and reduced permit requirements (County of Santa Barbara Planning & Development Department [P&D] 2022). The County's Long Range Planning Division prepared amendments to Article II, Coastal Zoning Ordinance (CZO) (Section 35-142), County Land Use Development Code (LUDC) (Section 35.42.015), and Montecito Land Use and Development Code (MLUDC) (Section 35.442.15) in response to revisions to Government Code Sections 65852.2 and 65852.22 regarding the permitting and regulating of ADUs and JADUs, respectively. On May 18, 2021, the County Board of Supervisors unanimously adopted the ADU and JADU zoning ordinance amendments and a resolution amending the Uniform Rules. The Uniform Rules amendment went into effect upon adoption on May 18, 2021. The County has been approving approximately 74 ADU/JADU permits a year between 2015 and 2022. The LUDC, MLUDC, and CZO amendments were adopted by the Board of Supervisors on November 7, 2023. Amendments went into effect in the Inland Area 30 days after adoption on December 7, 2023. The CZO amendment must be certified by the California Coastal Commission before it can go into effect in the Coastal Zone.

Short-Term Rental Ordinance Number 5014

On October 3, 2017, Santa Barbara County Ordinance Number 5014 was adopted by the County Board of Supervisors. The Ordinance made significant adjustments to regulations, allowances, and permitting requirements for Short-Term Rentals (STRs) in the unincorporated areas of the county. Amendments to sections of the LUDC changed the allowances for STRs as follows: not permitted in agricultural zones; not permitted in resource protection zones; not permitted in residential zones (though homestays are permitted); not permitted in industrial zones; permitted in all commercial zones except Neighborhood Commercial (CN) and PI (Professional and Institutional); and permitted in special purpose zones OT-R/LC (Old Town Residential/Light Commercial) and OT-R/GC (Old Town Residential/General Commercial) (County P&D 2021). An amendment to update STR regulations in the Coastal Zone is pending.

HOME Program

The County is the lead agency for the Santa Barbara County HOME Consortium, which also comprises the cities of Buellton, Carpinteria, Goleta, Lompoc, Santa Maria, and Solvang. The Consortium is awarded an annual allocation of funds directly from the United States (U.S.) Department of Housing and Urban Development (HUD) under the HOME Investment Partnerships Program. The purpose of the HOME program is to provide decent affordable housing to lower-income households. County HCD prepares the required Consolidated Plan that assesses housing needs for the Consortium and establishes a five-year plan to address housing priorities. HUD recently approved the 2010 to 2015 Consolidated Plan, which identifies the following housing needs as priorities for the 2010 to 2015 operating period:

- New construction/acquisition/rehabilitation of rental housing projects for lower-income households including large, small, and special needs households, as well as homeless, disabled, and elderly persons;
- Permanent supportive housing and Single Room Occupancy (SRO) units to address the needs of the homeless, households at imminent risk of becoming homeless, and/or persons with special needs;
- Universal design and accessibility standards to meet the specific needs of disabled populations;
- Energy efficiency and conservation design measures; and
- The proximity of projects to employment centers, public transportation corridors, and public services and amenities.

2.2 Project Location

This section describes the general location, boundaries, and setting for the proposed Project. The Project area includes unincorporated areas of Santa Barbara County, as well as selected County-owned properties in the City of Santa Barbara, as further described in Section 2.3, *Housing Element Update*.

2.2.1 Existing County Setting and Characteristics

Santa Barbara County is located along the California coast approximately 100 miles northwest of Los Angeles and is bordered by Ventura County to the east and south, Kern County to the east, San Luis Obispo County to the north, and the Pacific Ocean to the west and south (Figure 2-1). The county extends approximately 45 miles in a north-south direction and approximately 65 miles from an east-west-facing coastline. The county has approximately 117 miles of coastline connecting to San Luis Obispo County in the north and Ventura County to the south. Approximately 195 square miles (7 percent) of the county's land area is part of the Channel Islands.

Santa Barbara County contains eight small to medium-sized cities (i.e., Guadalupe, Santa Maria, Lompoc, Solvang, Buellton, Goleta, Santa Barbara, and Carpinteria) with populations ranging from approximately 5,100 (City of Buellton) to over 110,100 (City of Santa Maria) (U.S. Census Bureau 2022). The county also contains 19 unincorporated communities ranging in size from very small communities (e.g., Sisquoc and Garey), to small rural towns (e.g., Santa Ynez) with less than 5,000 residents each, to larger towns (e.g., Orcutt) and Census Designated Places (e.g., Eastern Goleta Valley) with more than 30,000 residents each (U.S. Census Bureau 2022) (Figure 2-1).

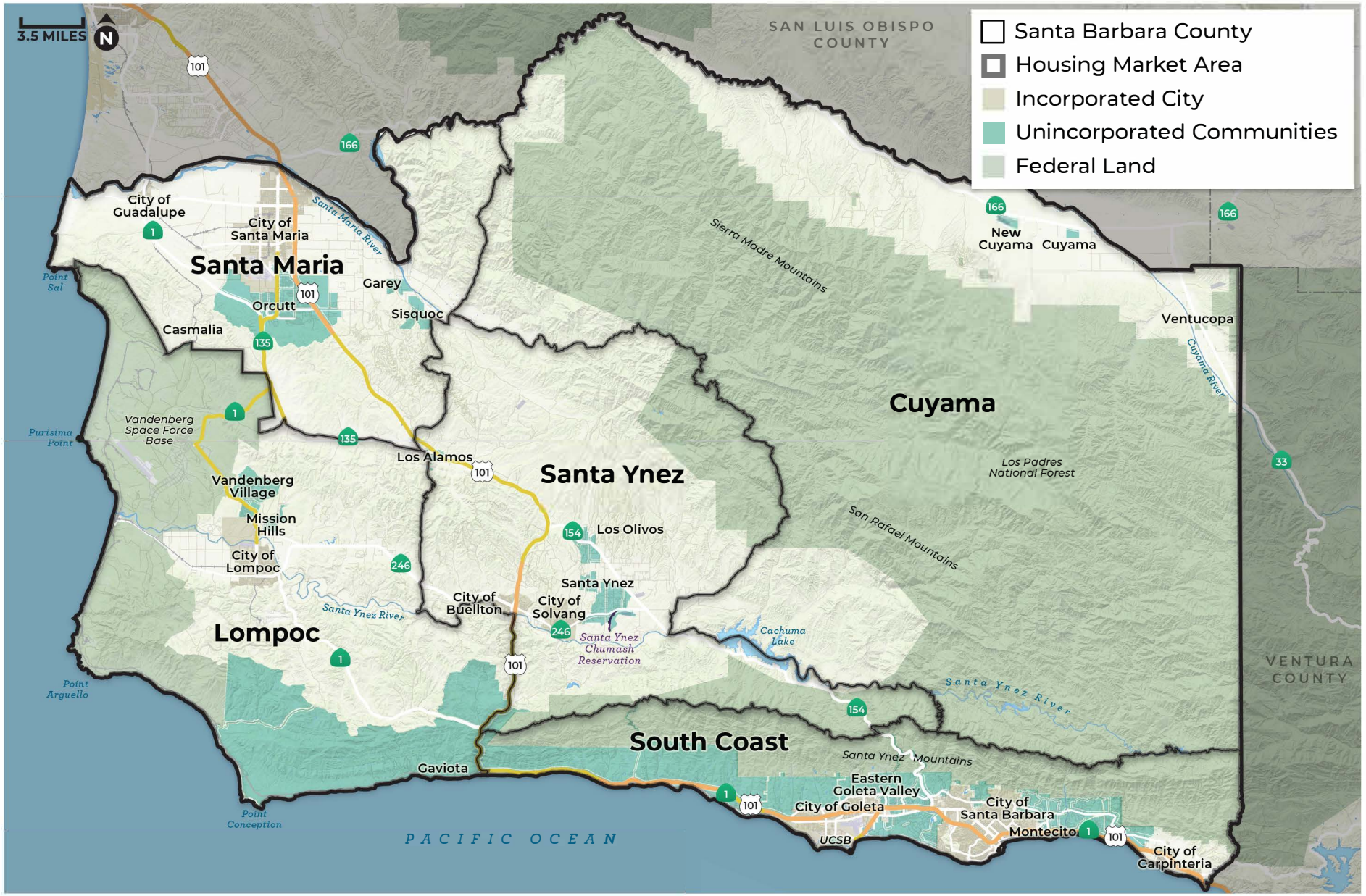
Topography in the county is highly varied within the coastal terraces between the ocean and mountains, the scenic inland valleys with large expanses of cultivated farmlands and gently rolling hillsides, and the rugged terrain of the LPNF. There are three mountain ranges within the county. The Santa Ynez range divides North County from the South Coast, and the Sierra Madre and San Rafael Mountains run parallel with the LPNF to divide the Cuyama Valley from the Santa Maria and Santa Ynez Valleys. The county's elevations range from sea level to 6,803 feet at Big Pine Mountain.

Regional road access to Santa Barbara County is provided primarily by U.S. Highway 101, which traverses the county north to south connecting to San Luis Obispo County and Ventura County, and State Route (SR) 166, which connects Santa Barbara County with Kern County in the east. Additional access to San Luis Obispo County is provided by SR 1. SR 150 provides secondary access to Ventura County. Union Pacific Railroad (UPRR) maintains north-south train tracks supporting daily Amtrak passenger operations and regional freight trains. Passenger rail stations are located in Carpinteria, Santa Barbara, Goleta, Lompoc (Surf Beach), and Guadalupe. Municipal airports in Santa Maria and Santa Barbara provide regional and national flight services; the Santa Ynez Airport, Lompoc Airport, and New Cuyama Airport support regional aviation. Santa Barbara Harbor also supports boating, fishing, and periodic cruise ship activities.

2.2.2 Unincorporated County and Housing Market Areas

The Project area includes all unincorporated lands countywide. The unincorporated county totals approximately 2,481 square miles (1.58 million acres), excluding the Channel Islands but including more than 1,232 square miles (more than 789,000 acres) of federal land within LPNF and Vandenberg Space Force Base (VSFB). Residential uses are primarily associated with distinct unincorporated urban communities, including Eastern Goleta Valley, Orcutt, Isla Vista, Montecito, Vandenberg Village, Mission Hills, Santa Ynez, Los Alamos, and Los Olivos. Outside urban communities, a majority of the land in the unincorporated areas is undeveloped and used for agriculture, recreation, and/or tourism with extensive areas of open space within LPNF, VSFB, and several State Parks located primarily along the coastline and in the mountainous areas.

The unincorporated county encompasses urban, semi-rural, and rural communities, which have diverse environments, population characteristics, employment opportunities, and housing markets. As a result, the county divided the unincorporated areas of the county into five Housing Market Areas (HMAs) approximately 40 years ago to distinguish the needs of individual communities and regions. The HMAs' boundaries coincide with the U.S. Census Bureau's Census Tract boundaries. The five HMAs are Santa Maria HMA, Lompoc HMA, Santa Ynez HMA, Cuyama HMA, and South Coast HMA (Figure 2-1). For planning purposes, the unincorporated area has two sub-regions: the South Coast, which is the South Coast HMA, and the North County, which comprises Santa Maria, Lompoc, Santa Ynez, and Cuyama HMAs. The Housing Element Update addresses housing needs in these HMAs and therefore the Project area and the environmental impact analysis provided in Chapter 3, *Environmental Impact Analysis* is organized further by five regions defined for Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and the South Coast. In the context of this Program EIR, the description of existing settings and environmental impact analyses are grouped by HMA where useful because individual projects within each HMA are likely to have similar impacts for any given resource area. In contrast, individual projects across different HMAs may have very different impacts on a given resource area. Organization by HMA allows this Program EIR to programmatically address impacts within each HMA where needed and compare and contrast impacts across the five HMAs to inform decision-making. A brief description of the setting for each HMA is provided below.



Santa Barbara County Regional Setting

FIGURE 2-1

Table 2-2. Overview of Housing Market Areas

HMA	Size (Acres)	Residents in Unincorporated Areas (2019)	Description
Santa Maria Valley	178,410	38,069	The Santa Maria Valley is located in the northernmost area of the county adjacent to San Luis Obispo County. The Santa Maria Valley includes the Orcutt Community Planning Area, the unincorporated communities of Garey, Sisquoc, and Los Alamos, and the incorporated cities of Santa Maria and Guadalupe. The Santa Maria River flows through the area from the Pacific Ocean inland to Cuyama. The area is accessible from U.S. Highway 101, SR 166, SR 135, and SR 1. Santa Maria and Orcutt combine to comprise the largest urban population in the county. Outside of this area, the Santa Maria Valley is largely agricultural and rural.
Lompoc Valley	296,292	18,617	The Lompoc Valley is located in the mid-western portion of the county, bound by the Purisima, Santa Rita, Santa Rosa, and White Hills. The Santa Ynez River traverses the Lompoc Valley in a westerly direction and drains into the Pacific Ocean at Ocean Beach County Park. This region is accessed by SR 1 from the north and south and SR 246 from the east and west. The Lompoc Valley includes a portion of the Gaviota Coast Planning Area as well as the unincorporated communities of Casmalia, Vandenburg Village, and Mission Hills, and the incorporated City of Lompoc. The population is generally concentrated in the City of Lompoc and the unincorporated communities of Vandenberg Village and Mission Hills. The unincorporated communities lie in low hills immediately north of the Santa Ynez River and the City of Lompoc to form the population center of the Lompoc Valley. This urbanized core is surrounded primarily by agriculture and open space.
Santa Ynez Valley	259,184	20,475	The Santa Ynez Valley is located in central Santa Barbara County at the base of several converging mountain ranges, including the San Rafael and Santa Ynez mountains, and the Purisima and Santa Rita hills. The area is accessible by U.S. Highway 101 from the southwest and northwest, SR 246 from the west, and SR 154 from the southeast. The Santa Ynez Valley includes the Santa Ynez Community Planning Area and the Los Alamos Community Planning Area. Urban areas are confined to the cities of Buellton and Solvang, and the unincorporated communities of Santa Ynez, Ballard, and Los Olivos. Population density is generally low in rural areas where land uses are predominantly ranches, grazing, agriculture, and open space.
Cuyama Valley	746,366	1,050	The Cuyama Valley constitutes the northeastern and eastern portion of the county, bound by the Caliente Mountain Range to the north and the Sierra Madre Mountains to the south. The Cuyama Valley is bisected by the Cuyama River and includes the unincorporated communities of Cuyama and New Cuyama. Access to the

Table 2-2. Overview of Housing Market Areas (Continued)

HMA	Size (Acres)	Residents in Unincorporated Areas (2019)	Description
			Cuyama Valley is provided by SR 166 from the northwest and SR 33 from the southeast. The population is mostly concentrated in the community of New Cuyama. These communities are geographically isolated from regional urban centers in Santa Maria and Santa Ynez by the LPNF and the mountainous areas of the county. The Cuyama Valley is predominantly rural and agricultural in use with small urban uses limited to Cuyama and New Cuyama.
South Coast	156,695	78,956	The South Coast HMA lies along the southern coastline of the county, including a portion of the Gaviota Coast Planning Area as well as the Goleta, Eastern Goleta Valley, Mission Canyon, Montecito, Summerland, and Toro Canyon community planning areas. Urban areas include the cities of Santa Barbara, Goleta, and Carpinteria, and the unincorporated communities of Eastern Goleta Valley, Isla Vista, Mission Canyon, Toro Canyon, Montecito, and Summerland, as well as the rural Gaviota Coast. This coastal area lies between the ridgeline of the Santa Ynez Mountains and the Pacific Ocean from Gaviota Pass to the Ventura County line. Urban development is concentrated within the eastern reach of the South Coast between Goleta and Carpinteria, while the western extent along the Gaviota Coast is rural and sparsely populated.

2.3 Housing Element Update

The Housing Element Update is designed to ensure that the County appropriately plans for and accommodates sufficient housing across all income levels and special needs groups within the unincorporated areas. Pursuant to Government Code Section 65583(b), the Housing Element Update sets forth goals and policies to address the preservation, improvement, and development of housing. Consistent with state requirements, the goals and policies also address the needs of all economic segments of the community and individuals and/or families with special housing needs. In addition, per Government Code Section 65583(c), the Housing Element Update includes a schedule of actions the County is undertaking or intends to undertake to achieve these goals and policies. Consistent with state law, the Housing Element Update is designed to ensure the availability of residential sites, at adequate densities and appropriate development standards, in the unincorporated areas to accommodate its share of the countywide RHNA. (See Section 2.1.2, *Regional Housing Needs Allocation Process.*)

For the 2023-2031 planning period, the County updated the existing provisions of the Housing Element by 1) deleting completed goals, policies, and programs, as necessary; 2) amending outdated and/or adding new goals, policies, and programs; and 3) preparing a detailed sites inventory to demonstrate the ability of the unincorporated area to accommodate new housing. through a combination of 1) vacant sites (under existing zoning capacity); 2) projected ADUs; and 3) pending

projects. The County also considered planning to accommodate a RHNA shortfall through a combination of 4) County-owned sites; and 5) rezoning of selected available sites. These updates address new state laws and current and projected housing needs identified by the housing needs assessment and constraints analysis. (Chapter 2*, Community Housing Needs Summary* of the Housing Element Update provides additional details.) As a result, the proposed Project effectively addresses the housing needs of all economic segments of the unincorporated areas in Santa Barbara County.

2.3.1 Goals and Objectives

Chapter 5, *Housing Plan and Resources* of the Housing Element Update includes six goals that the County developed based on public input and in recognition of the County's core community values, as follows:

1. Enhance the affordability, diversity, quantity, and quality of the housing supply and promote livable communities.
2. Promote, encourage, and facilitate housing for special needs groups.
3. Affirmatively further fair housing.
4. Preserve the affordable housing stock and cultivate financial resources for the provision of affordable housing in Santa Barbara County.
5. Foster cooperative relationships and efficient government.
6. Promote homeownership and/or the continued availability of affordable housing units through programs and implementing ordinances for all economic segments of the population, including extremely low-, very low-, low-, moderate-, and/or upper moderate-income households to assure that existing and projected needs for affordable housing are accommodated in residential development with preference given to people who live and/or work within Santa Barbara County.

The Program EIR recognizes these goals and builds upon them to provide Project Objectives that address key housing planning issues and related environmental impacts. These objectives helped guide the development of project alternatives and may set forth the basis for preparing findings and a statement of overriding considerations, if necessary (CEQA Section Guidelines 15124). (See also, Chapter 4, *Alternatives*.) The Program EIR's Project Objectives include the following:

1. Rezone sites to accommodate the County's state-mandated 6th Cycle RHNA (5,644 units) plus a 15 percent buffer for the lower- and moderate-income categories (576 units), which total 6,240 units.
2. Promote housing development on infill sites and maximize housing capacity by rezoning at higher densities to facilitate multifamily housing to accommodate housing for lower- and moderate-income households.
3. Promote a jobs-to-housing balance countywide by facilitating the development of sufficient and affordable housing in close proximity to job centers and essential community services.
4. Encourage diverse housing types that meet the requirements of special needs households.
5. Promote equal housing opportunities and locational choices for all persons in all housing types.

6. Promote and support fair housing choice and fair housing public outreach programs.
7. Collaborate with developers to improve and conserve affordable housing units and provide gap financing for affordable units.
8. Reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.
9. Prioritize housing for people who live and/or work within Santa Barbara County.
10. Ensure new housing sites have adequate infrastructure and do not face significant environmental constraints.

2.3.2 Project Components

The Housing Element Update serves as the guiding document for how the County will address its housing needs and help alleviate the local housing crisis. The Housing Element Update provides a housing plan to achieve the 6th Cycle RHNA targets for both the total number of additional units and the affordability mix needed to serve unincorporated areas in the county through 2031, consistent with applicable state housing laws. To do so, the proposed Project comprises the following main components as a basis for environmental impact analysis of the implementation of the Housing Element Update, as described further below.

- RHNA with Buffer for Lower- and Moderate-Income Units
- Housing Goals, Policies, and Programs
- Sites Inventory with a rezone program, including site selection as part of the implementation of the Housing Element Update

This Program EIR evaluates the proposed Project as a whole. That is, the potential impacts associated with future housing development enabled under the Housing Element Update are analyzed based on information available to the County where reasonably foreseeable, direct, and indirect physical changes in the environment could occur programmatically. The Program EIR, therefore, identifies the candidate housing sites as part of the proposed Project's rezoning program at a programmatic level. The proposed Project's rezoning program includes areas that may result in changes to the environment that were not already considered in previous environmental analyses or studies. Additional housing sites in locations dispersed throughout the county may also be considered for future development. However, further analysis was not conducted because the County had no further information, and other potential sites or areas countywide are considered speculative at this time.

RHNA with Buffer for Lower- and Moderate-Income Units

As described in Section 2.1.3, *Existing State and County Housing Programs*, Government Code Section 65863 ("No Net Loss Law") requires that cities and counties maintain adequate sites to accommodate their remaining unmet RHNA throughout the 2023-2031 planning period. The County increased its 2023-2031 RHNA for the lower- and moderate-income affordability levels by 15 percent, as recommended by the state. This buffer reduces the chance that the County will need to identify and rezone new sites to accommodate the remaining RHNA for the lower- or moderate-income affordability levels during the 2023-2031 planning period. The County did not include a buffer for the above-moderate affordability level since it has exceeded its RHNA for this level in the prior two housing element planning periods (Table 2-3).

Table 2-3. 6th Cycle RHNA + 15 Percent Buffer for the County of Santa Barbara

Sub-Region	Total RHNA +Buffer	RHNA by Income Level (Housing Units)		
		Lower[1]	Moderate	Above Moderate
South Coast	4,563	2,030	1,208	1,325
North County	1,677	928	263	486
Total	**6,240**	**2,958**	**1,471**	**1,811**

Notes:
[1] In compliance with state guidance, the County combines the RHNA plus 15 percent buffer housing units for very low-income and low-income into one housing affordability category for purposes of analysis. Similarly zoned sites (e.g., similar uses, densities, and development standards) that are feasible for low-income housing are also typically feasible for very low-income housing.

Housing Goals, Policies, and Programs

The proposed Project would implement the Housing Element Update's goals, policies, and programs, which would compel commensurate changes to the Land Use Element and the County's zoning ordinances. This section summarizes the key amendments and new programs to foster the future development of affordable housing as part of residential and mixed use development.

As noted above, to prepare the proposed Project, the County updated the 2015-2023 Housing Element by: 1) deleting completed goals, policies, and programs; and 2) as necessary, amending outdated and/or adding new goals, policies, and programs. These updates address public input, new state laws, and current and projected housing needs identified by a current housing needs assessment and constraints analysis. The proposed Project addresses and includes provisions to comport with significant changes to state housing element law implemented in the last few years that prioritize housing production in a manner that affirmatively furthers fair housing and supports the production of housing to meet the needs of the region. In particular, the proposed Project includes programs and actions that meet the provisions of Assembly Bill (AB) 1397 (Adequate Sites) and AB 686 (Affirmatively Furthering Fair Housing [AFFH]), including a comprehensive sites inventory and programs to ensure the provision of fair housing. The proposed Project meets and exceeds the stringent requirements of AB 1397 to ensure that selected housing sites qualify for inclusion in the RHNA, and AB 686 through the inclusion of a robust fair housing assessment and provision of meaningful actions to address fair housing issues.

As presented in Section 2.3.1, *Goals and Objectives*, the Housing Element Update has six goals. These goals would be implemented over the 8-year planning period (2023-2031) through the Housing Element Update's policies and programs to enable the production of housing at targeted affordability levels to meet the RHNA plus the 15 percent buffer and further provision of fair housing. The proposed Project includes 25 programs that would help the County achieve its housing goals, including analysis of potential housing sites and options for needed rezones (Program 1), provisions for use by right (i.e., ministerial) housing projects (Program 2), revisions to the County's IHO (Program 4), and local implementation of SDBL (Program 13) (Table 2-4). In total, this updated policy framework effectively addresses the housing needs of all economic segments of the unincorporated population in Santa Barbara County.

Table 2-4. 2023-2031 Housing Element Update Programs

No.	Program Title	Summary
1	Adequate Sites for RHNA and Monitoring of No Net Loss	• Rezone adequate housing sites in both the North County and South Coast to fully accommodate the County's RHNA plus the 15 percent buffer for lower- to moderate-income units • Monitor the development of sites included in the sites inventory to ensure an adequate number of sites remain available to meet the County's RHNA and the 15 percent buffer throughout the 2023-2031 planning period, pursuant to Government Code Section 65863. If for any reason parcels are developed with fewer units than identified in the sites inventory or with fewer lower- or moderate-income units than anticipated and the remaining sites in the sites inventory provide a buffer of 5 percent or less, the County shall initiate a process to identify, rezone, and add additional sites to its sites inventory. • Establish minimum densities of 20-30 units per acre and maximum densities of 25-40 units per acre • Revise development standards, including building height, lot coverage, and open space requirements, to ensure maximum densities can be achieved • Amend the County's zoning ordinances to allow a project applicant for a housing project to request a lower density (i.e., fewer units) than the specified minimum density when physical, environmental, infrastructural, or other constraints preclude a project from meeting the specified minimum density • Monitor the progress of pending projects in the entitlement process and if projects are not sufficiently progressing toward building permits, evaluate the capacity to accommodate the RHNA by income group and identify or rezone additional, suitable, and appropriately zoned sites
2	Use by Right Approval	• Update County zoning ordinances to allow use by right (i.e., non-discretionary) approval of housing projects on Housing Element sites with 20 percent of the units provided as affordable units to lower-income households and zoned/rezoned at a minimum of 20 units per acre, pursuant to Government Code Section 65583.2(c), and (i)
3	Replacement Housing	• Update the County's zoning ordinances to include the unit replacement requirements for development on all non-vacant sites that contain existing residential units or units that were rented in the past five years and occupied by low- or very low-income households, pursuant to Government Code Sections 65583.2 and 65915
4	Inclusionary Housing	• Update the County's IHO to include ADUs in place of the existing residential second units provisions, increase the duration of sales price restrictions from 45 to 90 years, consider options to apply IHO provisions to multifamily rental projects, and adjust other provisions to align with state law • Monitor and report on the effectiveness of the IHO requirements and in-lieu fees in providing lower-income housing
5	Tools and Incentives for High-Quality Affordable Housing	• Provide funding assistance and various tools and incentives to facilitate the development of affordable housing, including fee reductions, partnering with local non-profit and for-profit housing developers, and supporting outreach to provide financial assistance to lower-income households

Table 2-4. 2023-2031 Housing Element Update Programs (Continued)

No.	Program Title	Summary
6	Housing for Farmworkers and Other Employees	• Amend the County's zoning ordinances to allow all employee dwellings that accommodate up to six employees to be permitted similar to SFDs in the same zoning district • Amend the County's zoning ordinances to create a streamlined ministerial permit process for qualifying farmworker housing complexes in compliance with state laws
7	Project Homekey	• Continue to provide Project Homekey sites to convert and rehabilitate existing structures and build new permanent and interim housing for target populations • County-owned sites would be preferred Project Homekey project sites
8	Housing for the Homeless	• Implement the County's Community Action Plan to Address Homelessness, including providing housing units and long-term rental subsidies, coordinating and pooling funding to increase access to safe, affordable housing dedicated to persons experiencing homelessness
9	Sites for Emergency Shelters	• Update the County's zoning ordinances to expand the definition of "emergency shelter per Government Code Section 65583(a)(4), allow emergency shelters with ministerial permits in zones that allow residential uses pursuant to Government Code Section 65583(a)(4), and establish objective development standards for all emergency shelters
10	Accessory Dwelling Units (ADUs)	• Update the County's zoning ordinances to permit ADU development consistent with state law, including AB 2221 and SB 897, to encourage ADU construction • Develop pre-approved plans for ADUs
11	Senate Bill (SB) 9 Implementation	• Develop an ordinance that allows ministerial approval of housing development with no more than two primary units in a single-family zone, the subdivision of a parcel in a single-family zone into two parcels, or both, in compliance with SB 9
12	Priorities for Disposal of County Land	• Create a requirement to offer surplus County-owned land for sale or lease to develop lower- and moderate-income housing before disposing of the land, pursuant to Government Code Section 54227(a)
13	Density Bonus Provision	• Update County zoning ordinances to implement SDBL and consider a supplemental County density bonus program that incentivizes moderate-income housing
14	Water and Sewer Services	• Support expansion of water and wastewater services as needed to adequately serve sites identified for rezoning or housing development, including but not limited to desalination facilities, advanced water treatment and injection of water into groundwater basins, stormwater capture, reuse, and groundwater recharge • Support changes to Goleta Water District's policies, including allowing the conversion of agricultural water to residential water for affordable housing projects and allowing the transfer of water credits between properties • Support the implementation of water conservation methods (e.g., on-demand water heaters, cisterns/rain gardens) to improve the water use efficiency for new and existing development projects

Table 2-4. 2023-2031 Housing Element Update Programs (Continued)

No.	Program Title	Summary
15	Water and Sewer Service Priority for Affordable Housing	• Provide the adopted Housing Element Update to each water and wastewater service provider serving the unincorporated area, pursuant to Government Code Section 65589.7
16	Reduction of Governmental Constraints	• Amend the County's zoning ordinances to expand zones that allow certain uses-by-right, including bringing zoning ordinances up to date with state housing laws, allow special care homes with the same permit type as other residential uses of the same type in the same zone, update the definition of special care home, and create objective standards and ministerial permit paths for emergency shelters, transitional housing, supporting housing, and low-barrier navigation centers • Amend the County's zoning ordinances to ensure that the findings for approval for all housing development projects that require a discretionary permit are objective and consistent with state law • Update the County's zoning ordinances to permit multifamily housing in commercial zones, as well as senior-serving communities (e.g., assisted living, skilled nursing, etc.) • Adopt objective design standards for the MLUDC and CZO • Update the County's parking standards to be consistent with new state laws (e.g., AB 2097) • Suspend the Montecito Growth Management Ordinance
17	Tenant Protection and Fair Housing Services	• Continue to promote and enhance fair housing choice and fair housing public outreach programs
18	Preservation of Affordable Housing at Risk of Conversion to Market Rate and Mobile Home Parks	• Preserve 100 percent of affordable units at-risk of conversion to market-rate units during the planning period through funding support and outreach • Update County mobile home conversion ordinances to address mobile home closure provisions, pursuant to Government Code Sections 65863.7 and 66427.4
19	Short-Term Rentals	• Develop a Short-Term Rental (STR) Program for the unincorporated areas within the designated Coastal Zone to balance demands for low-cost overnight accommodations and the need to preserve housing for the local workforce
20	Housing Rehabilitation	• Support grant funds to maintain, upgrade, and/or rehabilitate existing lower-income affordable housing stock, including both SFDs and MFDs
21	Local Preference	• Study the development of a new ordinance or guidelines to reserve affordable and upper moderate-income housing units for people who live and/or work in Santa Barbara County to rent or purchase
22	Recreational Amenities for Housing Projects	• Annually review and update, as necessary, the County's development impact fees for parks, including a reduced fee for affordable housing projects and the creation of further incentives for the inclusion of on-site recreational facilities • Adopt the Countywide Recreation Master Plan that identifies needs and goals for recreational facilities in all unincorporated regions and identifies incentives to encourage the inclusion of public recreational opportunities within future housing development

Table 2-4. 2023-2031 Housing Element Update Programs (Continued)

No.	Program Title	Summary
23	Workforce Housing Study	• Prepare a workforce housing study that identifies the needs and evaluates potential sites for new housing that would serve this unique housing category
24	Rental Housing Incentive Program	• Create a program to incentives the development of rental housing, including potential County zoning ordinance amendments to provide increased density for smaller-sized units
25	Lower-Income Community Revitalization	• Continue to carry out a variety of place-based measures designed to revitalize communities in the County and to ensure equitable quality of life with a focus on environmental justice communities and other areas of high concentrations of affordable housing and/or lower-income households • Conduct outreach in environmental justice communities to frame the County's place-based efforts and prioritize planning and investment • Continue to implement the Environmental Justice Element, Active Transportation Plan, Recreation Master Plan, and other relevant plans to address issues related to land use, circulation, safety, environmental justice, community facilities, open space, and recreation

Summary of Selected Housing Programs for the Program EIR

Full details of all the housing programs can be found in Chapter 5, *Housing Plan and Resources* of the Housing Element Update. A number of the programs have no potential to create physical environmental impacts, such as Program 20 to support existing lower-income affordable housing stock or Program 23 to prepare a workforce housing study, and therefore are not described in detail below. This Program EIR addresses programs of the proposed Project that do have the potential to create direct or indirect environmental impacts, such as Program 1 to amend the County's zoning ordinances to provide more permissive development standards as incentives for affordable housing projects and rezone housing sites as needed to fully accommodate the RHNA. These select housing programs for the Program EIR are summarized below.

Program 1: Adequate Sites for RHNA and Monitoring of No Net Loss

Program 1 enables the County to modify required development standards, such as open space, setbacks, height limits, minimum lot coverage, and other applicable zoning standards to ensure that maximum densities can be achieved for new housing projects. Modifications to the development standards would be determined during future planned zoning ordinance amendments. This program would be more fully developed as implementation of the Housing Element Update, but absent specific changes, reasonably foreseeable parameters for the purpose of environmental review are outlined below. (Chapter 3, *Environmental Impact Analysis* provides a more detailed description of key assumptions about maximum buildout based on potential changes to development standards for the Program EIR analysis.)

- **Minimum and Maximum Densities**: The proposed Project would amend the County's existing development standards to create a minimum density for residential rezones, including DR land use designation and zoning district. The DR zoning district has historically accommodated a wide range of densities and housing types and currently has a maximum

allowed density of 30 units per acre and no specified minimum density. These amendments would establish minimum densities of 20-30 units per acre and maximum densities of 25-40 units per acre. These amendments would support the development of multifamily residential units that include lower- and moderate-income units.

- **Potential Reduced Required Onsite Open Space**: The current DR zoning district requires housing projects to dedicate a minimum of 40 percent of the site to common (i.e., private) open space, including landscaping and natural habitat areas and common uses such as private recreation (e.g., pools, clubhouses, tot lots). Under existing DR zoning standards, required open space may be reduced to 30 percent of the site as an incentive for affordable housing projects. The proposed Project could result in further reductions in required open space to ensure that maximum densities and target affordability can be achieved for housing projects. Reduced open space requirements would increase the amount of developable area onsite for housing projects. The reduced open space requirements would have commensurate reductions in space for landscaping, habitat protection, and recreational facilities.

- **Potential Increased Height Limits**: Currently, height limits vary and are codified in each zoning district, including the DR zoning district. The DR zoning district currently has a maximum building height of 35 feet or approximately three stories. Under existing DR zoning standards, height limits may be increased to 45 feet or approximately four stories or more to ensure minimum densities and target affordability can be achieved. On constrained sites, taller structures may be required to meet maximum or in some cases potentially even minimum densities required by the Housing Element Update. Further, the proposed Project may allow increased building heights to ensure maximum densities can be achieved for housing projects. While precise height limit increases have not been determined, potential increases to accommodate structures of four or more stories may occur in the County's development standards. This modification to County development standards would be particularly valuable for housing projects on sites that are constrained by topography, vegetation/habitat, defensible space requirements, flooding, or other open space or recreation area requirements.

- **Potential Reduced Setbacks**: Setbacks provide separation of uses, room for landscape screening, and yard space (e.g., front and backyards) and may be used for landscape buffers along major roadways or to provide separation and screening between potentially incompatible uses. All zoning districts codify minimum setback requirements that constrain the developable area onsite, including front yard, side yard, and rear yard setbacks. For example, the DR zoning district requires a minimum 20-foot front setback and 10-foot side and rear setbacks. Current zoning limits site coverage to a maximum of 30 percent of the site and allows for increased site coverage of up to 40 percent for affordable housing projects. For the DR zoning district, current standards limit the maximum percentage of the site area that may be covered by buildings, which effectuate setbacks from lot lines. The proposed Project could revise the development standards to reduce required setbacks and/or increase allowed developable area to ensure that maximum densities can be achieved. Reduced setbacks could increase the amount of developable area onsite for housing projects. The proposed Project could reduce front, side, and rear yard setbacks in multiple zoning districts, which could help accommodate affordable housing at levels targeted for the proposed Project.

Program 2: Use-by-Right Approval

Under the proposed Project, the County's zoning ordinances would be amended to address the zoning and use-by-right approval requirements in Government Code Section 65583.2(c). Use-by-right means that a proposed housing project is not subject to a conditional use permit or other discretionary review or approval or environmental review under CEQA, but instead would be reviewed through a building permit process not subject to public review and input and which would substantially limit County discretion to require project design changes or modifications to address environmental issues or planning concerns. By-right approval and permit issuance would include County review to ensure the proposed project is compliant with all provisions of the County's adopted zoning ordinances, and other regulations, including the California Building Code, California Fire Code, and County Building and Safety requirements. However, County review and approval would be ministerial. Pursuant to Government Code Section 65583.2(c), housing projects with 20 percent of the units affordable to lower-income households and zoned at a residential density allowing at least 20 units per acre on the following types of sites are use-by-right projects.

- Vacant sites included in the County's past 4th and 5th Cycle Housing Elements
- Non-vacant sites identified in the County's 5th Cycle Housing Element
- Vacant and non-vacant sites identified in the County's 6th Cycle Housing Element that provide at least 20 percent lower-income units

Program 4: Inclusionary Housing

As described in Section 2.1.3, *Existing State and County Housing Programs,* the County maintains the IHO to provide affordable units as part of housing development projects in the unincorporated areas with options to pay in-lieu fees rather than construct the affordable units onsite. The proposed Project would amend the County's IHO to 1) replace the residential second unit provision to include ADUs; 2) increase the length of time the unit retains the sales price restriction from 45 to 90 years; 3) consider applying the IHO to rental housing developments, and 4) make any other changes required to comply with state law. By the end of the planning period, the Housing Element Update estimates that 26 new units would be developed under the IHO as part of projects on housing sites identified in the Housing Element Update.

Program 6: Housing for Farmworkers and Other Employees

The County would meet annually with housing developers and employers to explore opportunities for affordable housing for employees, especially farmworkers. The County would pursue funding available for agricultural and employee housing, including but not limited to State HCD and U.S. Department of Agriculture (USDA) rural development program funds. By the end of the planning period, the Housing Element Update estimates that 100 new units would be developed to meet the needs of farmworkers, including extremely low-income farmworkers. (See also, Chapter 3, *Environmental Impact Analysis*.) The County would also amend its zoning ordinances to allow all employee dwellings that accommodate up to six employees to be permitted in the same manner as SFDs in the same zoning district, and provide a streamlined ministerial permit process for qualifying farmworker housing complexes in compliance with recent state laws amending the Health and Safety Code (AB 1783 and AB 107).

Program 7: Project Homekey

The County would continue to support and expand Project Homekey sites to foster the conversion and rehabilitation of existing structures (primarily hotels and motels) and new construction of permanent and interim housing for the target population. County-owned sites identified in the sites inventory would be preferred locations for Project Homekey projects. By the end of the planning period, the Housing Element Update estimates that 90 new permanent and interim housing units would be developed as Project Homekey projects.

Program 8: Housing for the Homeless

The County would implement the Community Action Plan to Address Homelessness, including providing permanent housing, long-term rental subsidies, funding pursuits, and support for Housing Choice Vouchers (HCV). By the end of the planning period, the Housing Element Update estimates that the housing inventory would include 835 permanent new units and 531 long-term rental subsidies of existing units dedicated to persons experiencing homelessness.

Program 11: Senate Bill 9 Implementation (Ministerial Approval of New Housing Projects)

In compliance with SB 9, the proposed Project would require the County to adopt a new ordinance that allows ministerial approval of housing development with no more than two primary units in a single-family zone, the subdivision of a parcel in a single-family zone into two parcels, or both. This program would explore requiring at least one of the new units resulting from the division of land under SB 9 to be restricted to moderate-income (80-120 percent of area median income [AMI]) or upper moderate-income (120-200 percent of AMI) households.

Program 10: Accessory Dwelling Units (ADUs)

As described in Section 2.1.3, *Existing State and County Housing Program* the County permits ADUs under existing zoning regulations. Under the proposed Project, ADUs would continue to be developed as accessory uses to an existing primary use, including SFDs and MFDs, within existing urban communities. ADUs are an important resource for providing lower- and moderate-income housing in the unincorporated area of the county particularly within single-family residential zoning districts where typically only one unit is developed. To facilitate ADU production, the County would update its online resources for potential project applicants, pursue and allocate financial incentives to support ADU construction and amend its zoning ordinances to comply with state law. The County would also develop pre-approved plans for ADU models that could be easily permitted and constructed by property owners. The County's ADU ordinances were recently amended to comply with recent changes to state ADU law, including but not limited to AB 2221 (2022) and SB 897 (2022), which incorporate a variety of provisions, including:

- Allowing an ADU to be sold or conveyed separately from the primary residence to a qualified buyer if certain conditions are met;
- If denying an ADU application, requiring a local agency to return in writing to the applicant a full set of comments with a list of items that are defective or deficient and a description of how the application can be remedied;
- Limiting a local agency to require compliance with only objective standards and defining "objective;"

- Increasing the maximum height limit a local agency may impose to 18 feet if the ADU is within one-half mile walking distance of a major transit stop or a high-quality transit corridor.

The County would pursue and allocate financial incentives to support ADU construction with the annual goal of assisting five lower-income households with ADU construction. Based on permitting records for ADU construction and the zoning amendments to foster ADU development in the unincorporated county, the Housing Element Update anticipates that up to 800 ADUs would be developed during the planning period; that is, approximately 100 ADUs per year over eight years. (See also, Chapter 3, *Environmental Impact Analysis.*) While ADUs are expected to contribute to meeting the County's RHNA, it is noted that ADUs are exempt from CEQA and discretionary permits per California Government Code Sections 65852.2 and 65852.22.

Program 13: Density Bonus Provisions

As described in Section 2.1.3, *Existing State and County Housing Programs,* the County maintains a local density bonus program to implement SDBL; however, the County SDBL ordinance was last updated in 2019 and does not currently reflect all applicable provisions of SDBL. To bring the County's ordinances into full compliance with SDBL and address the lack of housing available to moderate-income households, the County would evaluate and adopt, as appropriate, zoning ordinance amendments to improve the County's density bonus program to create an incentive for the construction of housing units for this income category. The County would also evaluate the appropriateness of a County-led density bonus program that incentivizes moderate-income housing, and if necessary, amend the zoning ordinances. The use of density bonus provisions would be promoted to developers for affordable housing during outreach. Density bonus provisions would encourage developers to increase the density of a site and are intended to significantly facilitate housing production.

Program 14: Water and Sewer Services for New Housing Projects

Government Code Section 65583.2(b)(5)(B) requires that parcels included in the inventory of sites to meet the RHNA "have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan… to secure sufficient water, sewer, and dry utilities supply to support housing development." Some of the sites identified by the County to meet its RHNA currently lack water and sewer connections and/or access to increased water use. Additionally, most of the sites identified to meet the RHNA are served by independent water and sewer districts. As part of the proposed Project, the County would: 1) support the expansion of wastewater facilities to accommodate new housing development, including the expansion of existing wastewater treatment facilities or the use of private wastewater package treatment plants in areas where facilities are limited or unavailable; and 2) work with water purveyors to increase water supply availability for housing development. This includes the expansion of water and wastewater service area boundaries and infrastructure to serve sites identified for rezoning or housing development in the Housing Element Update (e.g., City of Santa Maria, Golden State Water, Carpinteria Valley Water District, and Carpinteria Sanitary District). Permits would be prioritized for projects that expand water supply and wastewater capacity, including supply and infrastructure projects where they fall within County jurisdiction. On the South Coast, the County would further support an amendment of the Goleta Water District Code to eliminate the limitations on converting the use of water from agricultural to upper-moderate-, moderate-, and/or lower-income housing use(s) and advocate for the reversal of its policy prohibiting the

transfer of water credits from one property to another. These changes to water policy would support urban agricultural land conversion if needed to provide housing in the Eastern Goleta Valley.

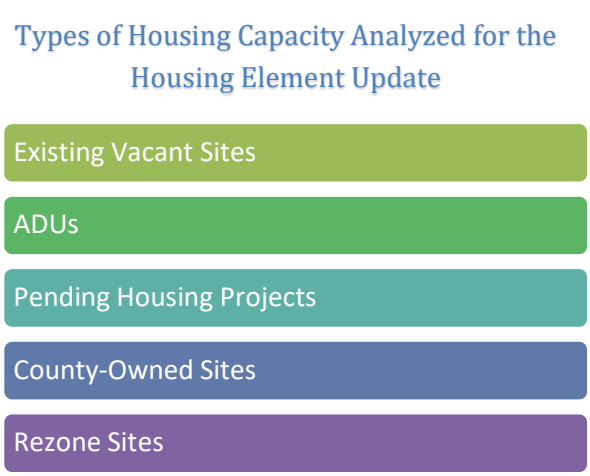
Sites Inventory

As part of the Housing Element Update, Government Code Section 65583(a)(3) requires the County to prepare an inventory of land suitable and available for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. This inventory, known as the sites inventory, is used to demonstrate that there is sufficient land at appropriate densities and development standards to accommodate the County's RHNA at the income levels specified within the planning period.

The sites inventory is intended as a planning tool to determine if the County has sufficient adequately zoned land (sites) to accommodate its RHNA. It is not a prediction or guarantee of future development. The inclusion of a site in the sites inventory does not obligate or commit a property owner to develop the site for housing. For this Program EIR, the sites inventory is used as an approximation of where and how environmental impacts associated with residential development could occur. (See Chapter 3, *Environmental Impact Analysis.*)

Housing Site Capacity Analysis

The County prepared a parcel-specific sites inventory that identifies potential housing sites in the unincorporated area. The sites inventory includes 445 sites comprising approximately 2,643 acres of land in the unincorporated areas of the county that could accommodate new housing during the 2023-2031 planning period.[3] Based on existing site features and zoning provisions, the County estimated the reasonably foreseeable number of housing units that could be constructed. The County also assessed the potential affordability levels of the housing units based on allowed densities, affordability targets of the RHNA, incentives provided by SDBL, and existing County programs, such as the IHO.



Existing RHNA Shortfall

Based on the County's assessment of existing capacity for housing from vacant sites under existing zoning, projected ADUs, and pending projects, the County faces a shortfall of 2,521 units for lower-

[3] The sites inventory includes vacant sites that have capacity for housing development under existing zoning, including residential and commercial zoning district standards in the County's zoning ordinances. Agricultural-zoned sites within a designated Rural Area are an exception. These sites may have capacity for residential development under the County's zoning ordinances. However, the Comprehensive Plan and zoning ordinances discourage the fragmentation of productive agricultural lands. As a result, the subdivision and development of these sites for residential use is uncommon. Therefore, the sites inventory excludes such sites, except those specific sites included on the potential rezones list. However, it does include some agricultural-zoned sites within a designated Urban Area on the South Coast (i.e., infill development).

and moderate-income households in the South Coast and 487 units for lower-income households in the North County to meet the County's RHNA plus a 15 percent buffer during the 2023-2031 planning period (Table 2-5 and Table 2-6). As such, the sites inventory also includes potential sites that could accommodate new housing if rezoned for residential use or rezoned to allow higher density as part of Program 1 of the Housing Element Update (Potential Rezone Program), as further described below.

Table 2-5. South Coast Shortfall of RHNA Units by Affordability Level

Method of Meeting the RHNA	Units by Affordability		
	Lower	Moderate	Above Moderate
RHNA	1,766	1,051	1,325
RHNA + 15% Buffer	2,030	1,208	1,325
Current Capacity (Vacant Sites, ADUs, and Pending Projects)	366	351	2,110
Surplus (+)/Shortfall (-)1	**-1,664**	**-857**	**+785**

Note:
Surpluses and shortfalls reflect RHNA plus a 15 percent buffer.

Table 2-6. North County Shortfall of RHNA Units by Affordability Level

Method of Meeting the RHNA	Units by Affordability		
	Lower	Moderate	Above Moderate
RHNA	807	229	486
RHNA + 15% Buffer	928	263	486
Current Capacity (Vacant Sites, ADUs, and Pending Projects)	441	520	1,730
Surplus (+)/Shortfall (-)1	**-487**	**+257**	**+1,244**

Note:
Surpluses and shortfalls reflect RHNA plus a 15 percent buffer.

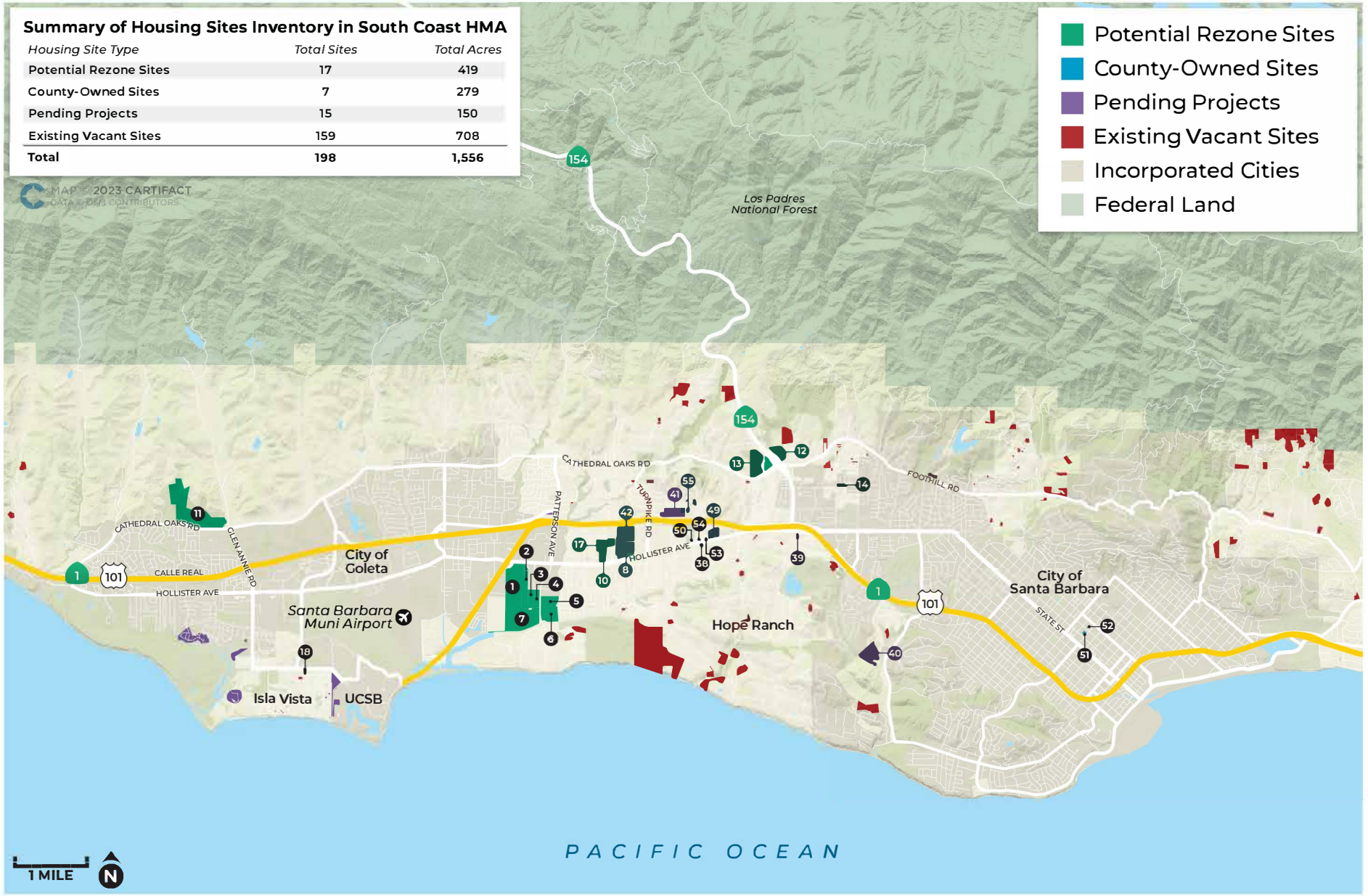
The following maps (Figure 2-2.A to Figure 2-7) include a high-level depiction of the location of: 1) pending projects; 2) vacant sites; 3) potential County-owned sites; and 4) potential rezone sites under the Project by HMA. ADUs are not depicted due to the unforeseeable locations of future units. For a more detailed image of all potential housing sites under the Project, please refer to the County's Housing Element Update Interactive Map:

https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=9375e0705e864eada0ff535c23ba99ac.

The location of all existing, vacant sites in the unincorporated county that under current zoning allow housing is provided in Appendix D.9*, Inventory of Vacant Sites* of the Housing Element Update.

Summary of Housing Sites Inventory in South Coast HMA

Housing Site Type	*Total Sites*	*Total Acres*
Potential Rezone Sites	17	419
County-Owned Sites	7	279
Pending Projects	15	150
Existing Vacant Sites	159	708
Total	**198**	**1,556**

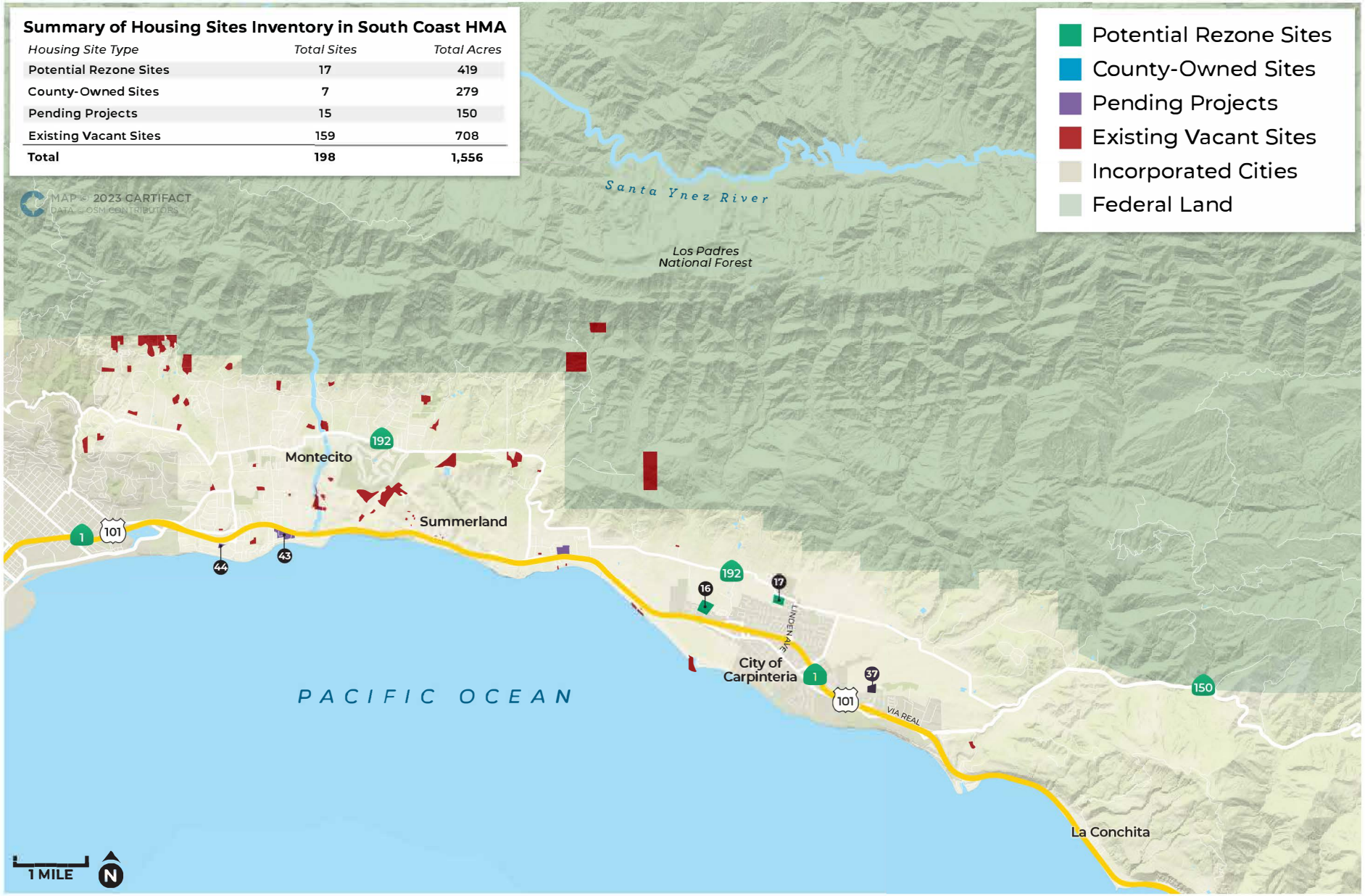


South Coast HMA Housing Sites Inventory - Goleta Area

FIGURE 2-2.A

Summary of Housing Sites Inventory in South Coast HMA

Housing Site Type	*Total Sites*	*Total Acres*
Potential Rezone Sites	17	419
County-Owned Sites	7	279
Pending Projects	15	150
Existing Vacant Sites	159	708
Total	**198**	**1,556**

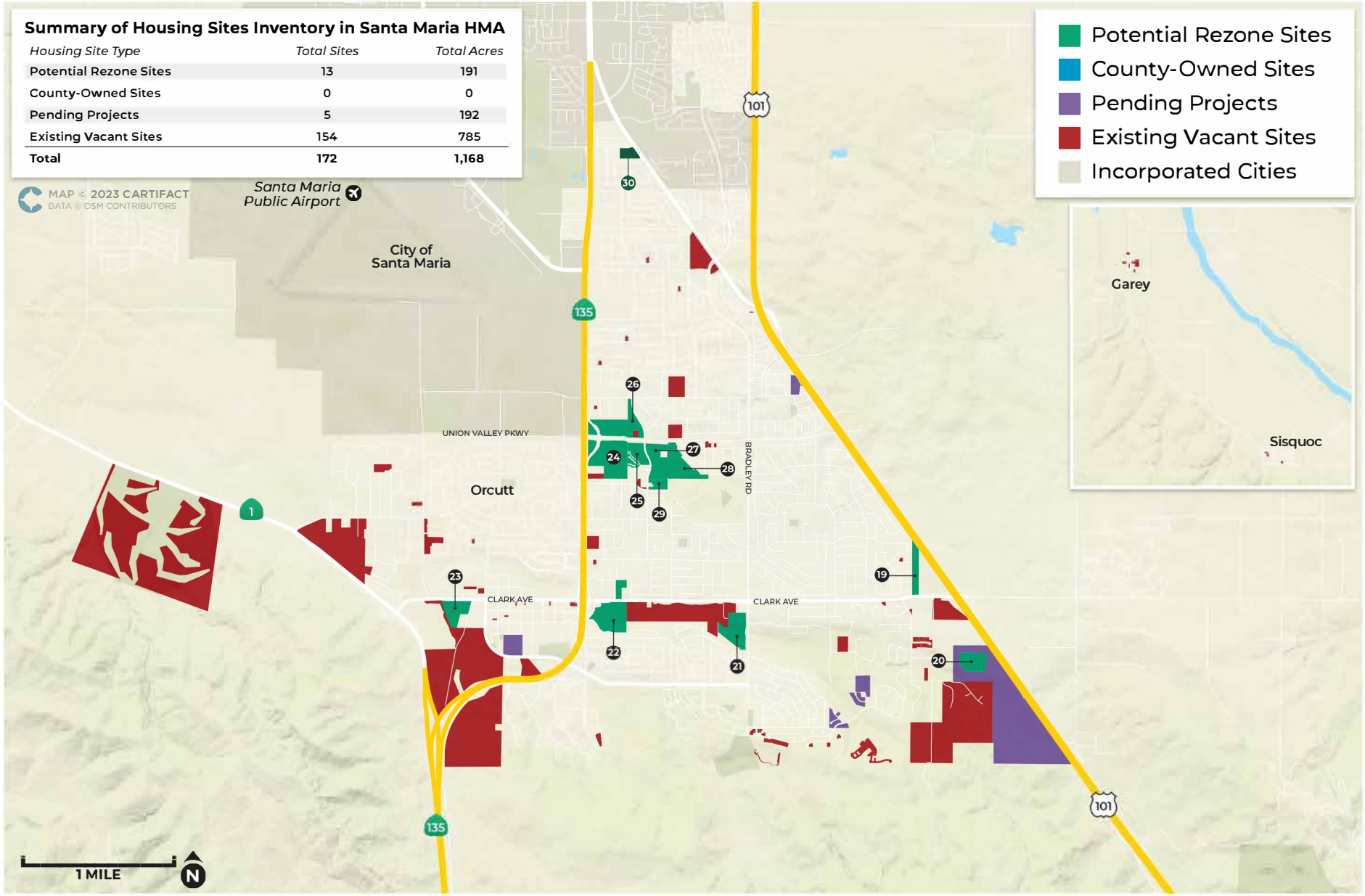


South Coast HMA Housing Sites Inventory – Carpinteria Area

FIGURE 2-2.B

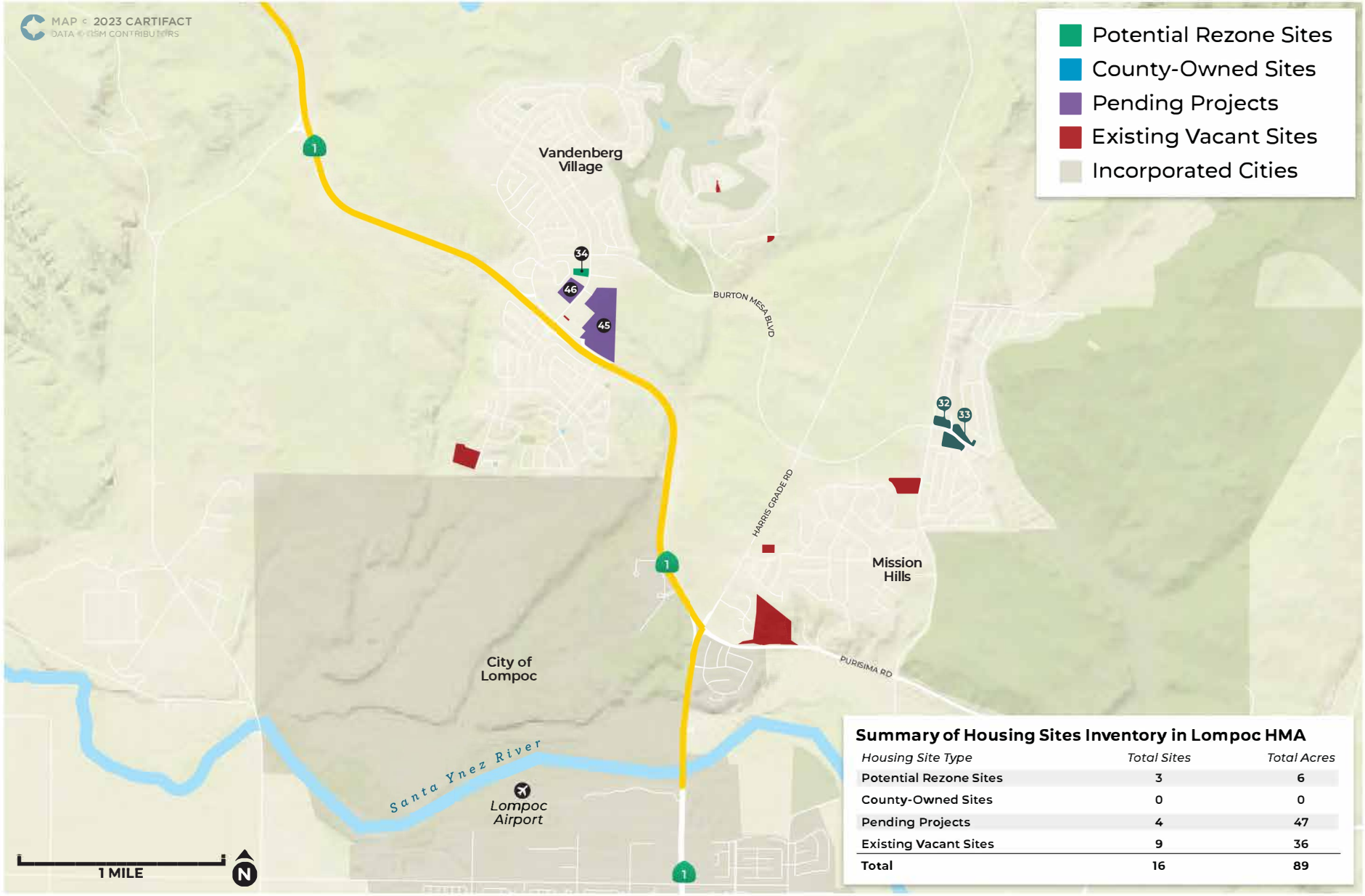
Summary of Housing Sites Inventory in Santa Maria HMA

Housing Site Type	*Total Sites*	*Total Acres*
Potential Rezone Sites	13	191
County-Owned Sites	0	0
Pending Projects	5	192
Existing Vacant Sites	154	785
Total	**172**	**1,168**



Santa Maria HMA Housing Sites Inventory

FIGURE 2-3



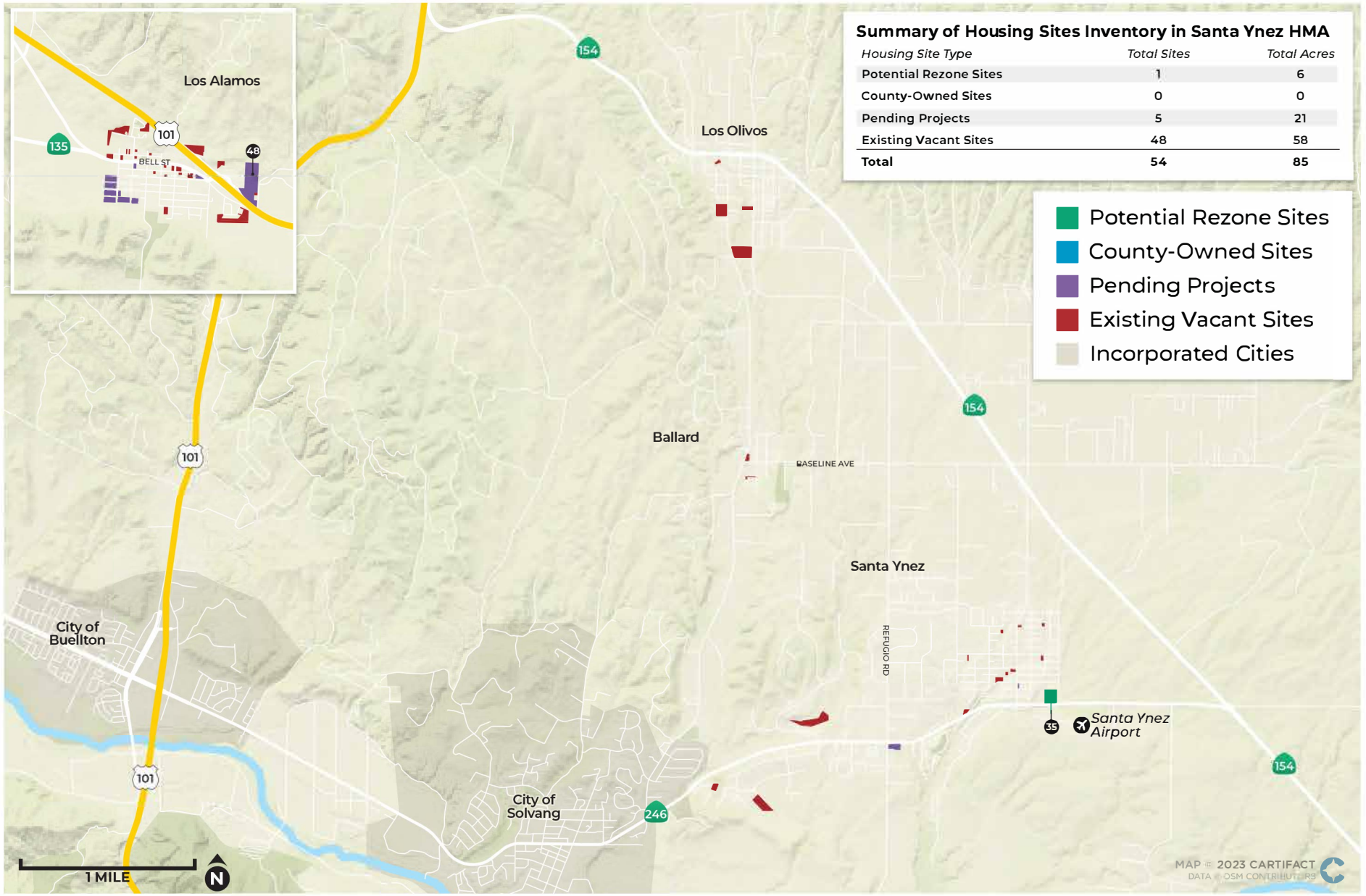
Summary of Housing Sites Inventory in Lompoc HMA

Housing Site Type	*Total Sites*	*Total Acres*
Potential Rezone Sites	3	6
County-Owned Sites	0	0
Pending Projects	4	47
Existing Vacant Sites	9	36
Total	16	89

wsp

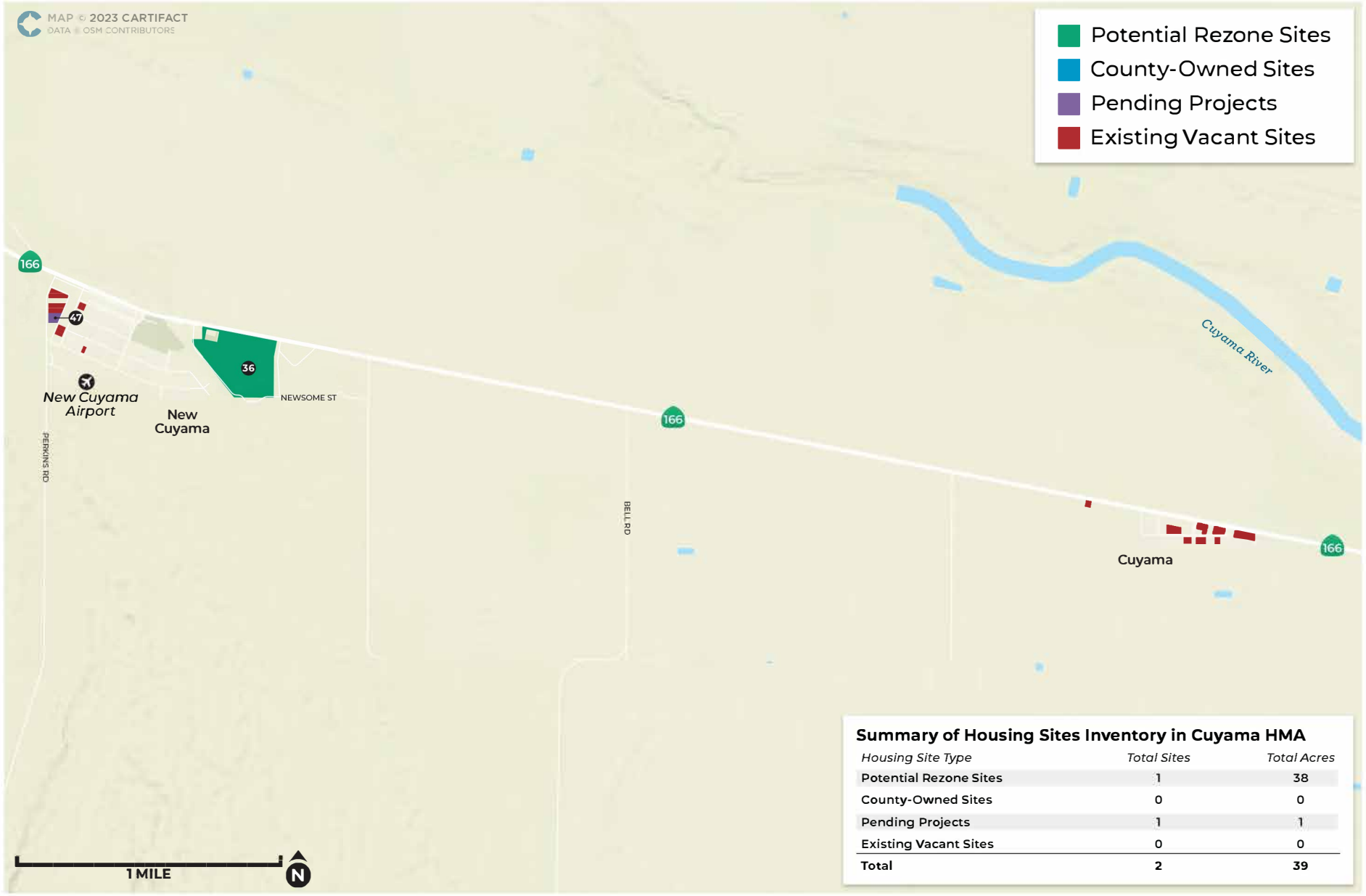
Lompoc HMA Housing Sites Inventory

FIGURE 2-4



Santa Ynez HMA Housing Sites Inventory

FIGURE 2-5



Summary of Housing Sites Inventory in Cuyama HMA

Housing Site Type	*Total Sites*	*Total Acres*
Potential Rezone Sites	1	38
County-Owned Sites	0	0
Pending Projects	1	1
Existing Vacant Sites	0	0
Total	2	39

wsp

Cuyama HMA Housing Sites Inventory

FIGURE 2-6

Estimating the Maximum Potential Housing Growth for the Program EIR

The Board of Supervisors will select a sufficient number of housing sites necessary to accommodate RHNA plus a 15 percent buffer for lower- and moderate-income households.

As described further below and in Chapter 3, *Environmental Impact Analysis*, the sites inventory informs the Program EIR's analysis to indicate where, how, and to what degree housing development could occur in the county during the 2023-2031 planning period. The calculation of future development potential and buildout that could occur under the Housing Element Update is complex and based on the sites inventory. For CEQA analysis, the potential buildout estimate must account for the maximum capacity scenario under the County's zoning ordinances to ensure that buildout projections support a reasonable worst-case analysis of potential environmental impacts. For State HCD review, the buildout estimate must account for the requirements of state law, which sets forth conservative assumptions for how to calculate a "realistic capacity" of the sites inventory to meet the County's RHNA, which would be a minimum capacity scenario. In addition, the potential rezone sites have been identified for minimum/maximum densities (e.g., 30/40 units per acre), leading to two levels of overall projected growth under the proposed Project. That is, applying minimum and maximum densities generates two different buildout projections.

To address this issue, this Program EIR acknowledges the existing RHNA shortfall identified in the Housing Element Update based on the minimum capacity buildout scenario to ensure the sites inventory provides a realistic capacity to meet the RHNA, but the Program EIR analyzes the maximum capacity scenario presented herein based on site size, existing and potential zoning, and the application of development standards regulating building height, size, and scale. (Chapter 3, *Environmental Impact Analysis* provides detailed assumptions and methodologies employed in the Program EIR's maximum buildout scenario.)

Further, the County included more sites in the sites inventory than necessary to meet the RHNA plus a 15 percent buffer and to provide the opportunity for public feedback and decision-maker choice in selecting rezone and/or County-owned sites during the implementation of Program 1 of the Housing Element Update. Based on the sites inventory and the maximum capacity buildout scenario, the proposed Project would have the capacity to accommodate up to an additional 34,558 housing units, including 18,042 units on the South Coast and 16,516 units in North County. Additionally, the proposed Project would have the capacity to accommodate up to 1,549,170.8 square feet of additional commercial uses as part of mixed use projects, including 14,374.8 square feet on the South Coast and 1,534,796.0 square feet in North County. (See Chapter 3, *Environmental Impact Analysis* for calculations of the potential net increase in housing units and commercial space based on the sites inventory.) **As part of the proposed Project, the County Board of Supervisors will select a sufficient number of sites to accommodate the RHNA plus a 15 percent buffer for lower- and moderate-income households leaving surplus sites that will not be rezoned. Thus, the true potential buildout of the housing units across the county will be reduced.**

The site types comprising the sites inventory are summarized below, which include: 1) vacant sites; 2) projected ADUs; 3) pending projects; 4) potential County-owned sites; and 5) potential rezone sites. A summary description of the sites' location, total number, and size in acres is provided for each site type included in the sites inventory. Based on the sites inventory, Chapter 3, *Environmental Impact Analysis* calculates the maximum potential net increase in housing units and commercial square footage associated with the proposed Project as a basis for impact analysis. The complete sites

inventory and calculations of maximum potential net housing growth for the Program EIR are available in Appendix B.

Table 2-7. Summary of Sites Inventory by HMA

HMA	Total Number of Sites	Total Acres
Santa Maria Valley	172	1,168
Lompoc Valley	16	89
Santa Ynez Valley	54	86
Cuyama Valley	2	39
South Coast	201	1,496
Total	**445**	**2,878**

Notes:
[1] Based on GIS data of the sites inventory prepared for the Housing Element Update (See also, Chapter 3, *Environmental Impact Analysis*.)

Existing Vacant Sites

The unincorporated county has vacant properties that are zoned for residential uses. These vacant properties constitute opportunities for housing development to meet the RHNA under existing zoning, particularly with proposed Project programs to foster housing development.

Through the review of the sites inventory, 370 sites are vacant parcels zoned appropriately to support residential development, including 211 parcels in the North County and 159 parcels on the South Coast (Table 2-8). For CEQA environmental review, these sites could accommodate up to 4,144 new housing units under the maximum allowed zoning densities and estimated bonus density incentives provided by SDBL, including 528 units on the South Coast and 3,616 units in North County. (See also, Chapter 3, *Environmental Impact Analysis*.) In addition, existing commercial zoned sites could accommodate up to 453,242 square feet of new commercial uses as part of mixed use development, including approximately 438,867 gross square feet in North County and approximately 14,375 gross square feet on the South Coast.

Table 2-8. Summary of Existing Vacant Sites by HMA

HMA	Total Number of Sites	Total Acres
Santa Maria Valley	154	785
Lompoc Valley	9	36
Santa Ynez Valley	48	58
Cuyama Valley	0	0
South Coast	159	708
Total	**370**	**1,587**

Notes:
[1] Based on GIS data of the sites inventory prepared for the Housing Element Update (See also, Chapter 3, *Environmental Impact Analysis*.)

ADU Production

ADUs are independent dwelling units located on a parcel with an SFD or MFD. They include a permanent kitchen, bathroom, and sleeping area. ADUs may be attached to a dwelling or detached as

a stand-alone structure. Government Code Sections 65852.2(m) and 65583.1 permit the County to count future ADUs towards its 2023-2031 RHNA.

The sites inventory estimated the capacity for ADUs in unincorporated areas based on permitting records for ADUs in the prior planning period (2015-2022), as well as new state laws that incentivize new ADUs. As a result, the Housing Element Update anticipates that up to 800 new ADUs could be constructed over the planning period, with over 50 percent of the new ADUs anticipated on the South Coast where housing demand is highest (Table 2-9). The County's capacity for ADUs would help address its RHNA under existing zoning regulations as amended by the proposed Project (refer also to *Housing Goals, Policies, and Programs*, above)

Table 2-9. Estimated Capacity for ADUs by HMA

Housing Market Area	Number of ADUs[1]	Percent of Total ADUs
Santa Maria Valley	221	27.6%
Lompoc Valley	23	2.9%
Santa Ynez Valley	101	12.7%
Cuyama Valley	3	0.3%
South Coast	452	56.5%
Total	**800**	**100%**

Notes:
[1] Total ADUs by HMA are projected based on ADU permitting records between 2015-2022. (See also, Chapter 3, *Environmental Impact Analysis*.)

Pending Housing Projects

County-permitted pending projects are residential projects that require a County Land Use Permit, Development Plan, Conditional Use Permit, or other planning permit. The County used its permit-tracking database, Accela, to compile a list of these projects, including projects in various stages of review or construction, such as pre-application in progress, planning permit in progress or approved, and building permit in progress or approved. Specifically, the list includes residential projects that were started in the 2015-2023 planning period but were not issued a certificate of occupancy before June 30, 2022. It also includes residential projects that started in the 2023-2031 planning period.

Further, State HCD allows cities and counties to count planned housing units on property owned by colleges and universities (State HCD 2020b). "Housing unit" means a house, apartment, group of rooms, or single room occupied or intended for occupancy as separate living quarters. They do not include residence halls, dormitories, or other similar student housing designed to house college and university students in group living arrangements. The County in collaboration with University of California, Santa Barbara (UCSB) representatives identified three on-campus pending residential projects that will be constructed and occupied by faculty and staff within the 2023-2031 planning period.

The total number of units and affordability levels estimated for the Housing Element Update are based on project descriptions in permit applications and/or preliminary plans from property owners and developers. The sites inventory evaluated all pending projects that would contribute to new housing in unincorporated areas once completed during the 2023-2031 planning period. Pending housing development comprises 30 projects involving 411 acres in the unincorporated area, including 18 pending projects that have completed environmental review as cumulative projects and 12 pending

projects are early concepts or proposals that have not proceeded through County permitting and environmental review. (See Chapter 3, *Environmental Impact Analysis* for information related to cumulative projects for the Program EIR's analysis.) For this Program EIR, pending projects that have not proceeded through County permitting and environmental review comprise 12 parcels, including eight on the South Coast and four in North County. For CEQA environmental review, these 12 pending project sites could accommodate up to 1,536 new housing units under the maximum allowed zoning densities and estimated bonus density incentives provided by SDBL, including 1,092 units on the South Coast and 444 units in North County. In addition, these 12 pending project sites could accommodate up to 49,400 square feet of new commercial uses as part of mixed use development all within North County. (See also, Chapter 3, *Environmental Impact Analysis*.)

Table 2-10. Summary of Pending Housing Projects by HMA

HMA	Total Number of Sites	Total Acres
Santa Maria Valley	5	192
Lompoc Valley	4	47
Santa Ynez Valley	5	21
Cuyama Valley	1	1
South Coast	15	150
Total	**30**	**411**

Notes:
[1] Based on GIS data of the sites inventory prepared for the Housing Element Update (See also, Chapter 3, *Environmental Impact Analysis*.)

Potential County-Owned Housing Development Sites

The County owns nearly 500 vacant and non-vacant sites totaling approximately 6,200 acres in the unincorporated and incorporated (i.e., within city boundaries) areas of the county. The County retains authority for approving, permitting, and certifying occupancy of residential and other types of development on its properties in both the unincorporated and incorporated areas. Therefore, it can count future housing units on these properties toward its RHNA.

County staff evaluated all County-owned sites and classified them as suitable or unsuitable for high-density housing projects. Factors that made sites unsuitable include the following:

- Smaller than 0.5 acre in size;
- Odd or irregular shape;
- Non-vacant (e.g., public buildings, offices, and fire stations) with no foreseeable opportunity for redevelopment;
- Existing parks and recreation areas; and/or
- Steep slopes, flood hazards, environmentally sensitive habitats, or other environmental constraints.

While most of the County-owned sites were determined unsuitable for residential development, the sites inventory identified existing County-owned sites that could be available for housing development during the 2023-2031 planning period. The County identified seven potential sites comprising 95.4 acres all on the South Coast that could provide up to 320 units during the 2023-2031

planning period (Table 2-11). Five of the sites are identified in the Eastern Goleta Valley either on the Calle Real County Administration Campus or in the vicinity of the Ben Page Youth Center. Two of the identified County-owned sites lie within the downtown area of the City of Santa Barbara (Figure 2-6). The County may retain ownership of these sites and, therefore, would be able to control the number and affordability level of future units on each site. The County-owned sites may be preferred locations for several actions of the Housing Element Update, including projects serving the homeless, residential care, or other special housing needs.

Table 2-11. Summary of County-Owned Housing Sites by HMA

HMA	Total Number of Sites	Total Acres
South Coast – Eastern Goleta Valley	5	94.2
South Coast – City of Santa Barbara	2	1.2
Total	**7**	**95.4**

Notes:
[1] Based on GIS data of the sites inventory prepared for the Housing Element Update (See also, Chapter 3, *Environmental Impact Analysis*.)

Potential Rezone Program (Program 1 of the Housing Element Update)

Based on the Housing Element Update, the County would need to rezone sites to accommodate a shortfall of 2,521 units for lower- and moderate-income households in the South Coast and 487 units for lower-income households in the North County (Table 2-5 and Table 2-6). The County identified 36 sites that could be rezoned to accommodate new housing to meet its RHNA, including affordability targets. The potential rezoning program identifies more sites than necessary in the Housing Element Update to provide the opportunity for public feedback and decision-maker choice in selecting sites as part of the proposed Project. ***The Board of Supervisors will select a sufficient number of housing sites necessary to accommodate the RHNA plus a 15 percent buffer for lower- and moderate-income households.*** This will occur during public hearings as part of the Board of Supervisors selection process for the rezone sites. The Board may consider the following information contained within this Program EIR when selecting potential rezone and/or County-owned sites.

1. The County's Housing Element Update is the County's only housing policy; it is used for determining projected residential growth.

2. This Program EIR is an evaluation tool for decision-making purposes and does not establish County policy.

3. The State of California requires that the Housing Element Update make conservative projections about development on housing sites so that jurisdictions are not over-promising how much housing will be built in the planning period. County staff conservatively estimated the minimum total housing units that could be developed on rezone sites based on minimum allowed density (i.e., units per acre) and assumed that the site area for housing development would be physically constrained by features, such as flood hazard zones, environmentally sensitive habitat areas, and other known constraints. The projected growth in the Housing Element Update is 6,240 units (RHNA of 5,664 + 15 percent buffer). State HCD divided the County's RHNA into two sub-regions, referred to as the South Coast and North County. The state required that nearly three-quarters of the County's RHNA be allocated to the South Coast.

4. CEQA requires an assessment of the maximum development potential of all housing sites, including those that the Board of Supervisors may not select from the list of final housing rezone sites. Therefore, this Program EIR assesses the theoretical buildout of all housing sites identified in the County's sites inventory. This results in a variation in the total number of housing sites identified in the Housing Element Update versus the Program EIR.

5. The state required the County to establish a conservative minimum and maximum density per acre for potential housing rezone sites in the County sites inventory. The state requires housing rezone sites to have a minimum of 20 units per acre. The County selected to establish a minimum of 20 to 30 units per acre for all housing rezone sites. The minimum density per acre selected was dependent on a range of factors (e.g., environmental constraints). However, in compliance with CEQA worst-case scenario analysis requirements, the Program EIR assesses the impacts associated with the maximum density per acre development for all potential housing rezone sites (25 to 40 units per acre).

    a. The Housing Element Update's minimum density per acre development calculations do not include the potential provision of SDBL, which grants additional housing units as an incentive for qualifying affordable housing. The Program EIR maximum potential buildout calculations include the assessment of maximum density per acre with the addition of the potential provision of SDBL for qualifying housing sites.

The 36 sites that would be considered for rezoning under Program 1 (Potential Rezone Program) to accommodate housing were identified by prioritizing vacant infill sites in designated Urban Areas. These sites are nearer to public transit, water and sewer, utilities, and other services and infrastructure. The County included sites provided the land suitable for residential development was a one-half acre or larger, a practical configuration, readily accessible, and otherwise suitable for high-density residential development. The County maintains geographic information system (GIS) and PhotoMapper® databases with more than a dozen environmental constraint layers; these databases were used to identify and analyze the effects of known environmental constraints on potential rezone sites. The County eliminated sites with substantial constraints, such as severe flood hazards, steep slopes, critical plant or wildlife habitat, or other significant environmental constraints that would make the site unsuitable for residential uses. In other instances, environmental constraints only affect a portion of a site. County staff also considered key programs and regulations that could limit or preclude residential development, such as the Williamson Act, Coastal Act, and airport safety zones. County staff considered sites zoned for agriculture and sites in a designated Rural Area as a last resort.

Government Code Section 65583.2(c)(3) requires that the County apply a minimum residential density of at least 20 units per acre to all rezone sites that would accommodate units for lower-income households. The County's current zoning ordinances generally limit residential density to 20 units or less per acre. Applying a density of 20 units per acre to all potential residential rezone sites would not provide sufficient units to accommodate the County's RHNA plus a 15 percent buffer for the lower- and moderate-income households. Therefore, the County is considering higher residential densities for many potential rezone sites. The County would also apply a minimum and maximum residential density to each potential rezone site. For example, the County may rezone a site as DR with a minimum density of 20 units per acre and a maximum density of 30 units per acre (DR-20/30). The proposed new zoning standards for potential rezone sites include the following:

- **DR-20/25 (Minimum/Maximum):** The County applied this zone to rezone sites that fall, at least in part, within Safety Zone 4. Caltrans defines airport safety zones as "an area near an

airport in which land use restrictions are established to protect the safety of the public from potential aircraft accidents" (Caltrans 2011). Safety Zone 4 limits residential development to 25 units per acre.

- **DR-20/30 (Minimum/Maximum):** The County applied this zone to rezone sites where a higher density would be inappropriate given surrounding land uses and limited services and infrastructure.
- **DR-30/40 (Minimum/Maximum):** The County applied this high-density zone to sites best suited for the densest residential development.

The proposed Project's Potential Rezone Program comprises 36 potential rezone sites involving 660 acres in the unincorporated area, including 419 acres on the South Coast and 241 acres in North County (Table 2-12). For this Program EIR, For CEQA environmental review, the potential rezone sites could accommodate up to 28,558 new housing units under the maximum allowed zoning densities and estimated bonus density incentives provided by SDBL, including 16,102 units on the South Coast and 12,456 units in North County. In addition, these potential rezone sites could accommodate up to 1,046,529.0 square feet of new commercial uses as part of mixed use development all within North County. (See also, Chapter 3, *Environmental Impact Analysis*.)

Table 2-12. Summary of Potential Rezones by HMA

HMA	Total Number of Sites	Total Acres
Santa Maria	13	191
Lompoc	3	6
Santa Ynez	1	6
Cuyama	1	38
South Coast	18	419
Total	**36**	**660**

For CEQA purposes, all potential rezone sites, pending project sites, and County-owned sites identified in Table 2-13 are considered in the Program EIR's analysis, recognizing that the proposed Project includes a process for the Board of Supervisors to select and discard potential rezone sites and/or County-owned sites to achieve the County's RHNA, as further described in Chapter 3, *Environmental Impact Analysis*.

Table 2-13. List of Potential Rezone Sites, Pending Project Sites, and County-Owned Sites Included in the Sites Inventory

#	Site Name	APN(s)	Current Zoning	Potential Zoning	RHNA Subregion	Size (Acres)
Potential Rezone Sites Considered in the Program EIR Analysis						
1	Giorgi	071-140-064	AG-I-10	DR-30/40	South Coast	64.8
2	St. Athanasius Church	071-140-072	AG-I-10	DR-30/40	South Coast	20.56
3	Scott	071-140-071	AG-I-10	DR-30/40	South Coast	9.38
4	Ekwill	071-140-048	AG-I-10	DR-30/40	South Coast	8.23
5	Caird 1	065-090-031	AG-I-10	DR-20/25	South Coast	15.22
6	Caird 2	065-230-012	AG-I-10	DR-20/25	South Coast	15.85

Table 2-13. List of Potential Rezone Sites, Pending Project Sites, and County-Owned Sites Included in the Sites Inventory (Continued)

#	Site Name	APN(s)	Current Zoning	Potential Zoning	RHNA Subregion	Size (Acres)
7	Caird 3	071-190-036	AG-I-10	DR-20/25 and AG-I-10	South Coast	60.83
8	San Marcos Growers 1	065-040-041	AG-I-5	DR-30/40	South Coast	27.37
9	San Marcos Growers 2	065-030-012	AG-I-5	DR-30/40	South Coast	5.7
10	McCloskey Lelande	065-080-010 065-080-011	AG-I-5	DR-30/40	South Coast	6.95
11	Glen Annie	077-530-021 077-530-020 077-530-012	AG-II-40	DR-1.5 and DR-30/40	South Coast	94.7
12	St. Vincent's – East	059-130-011	DR-1 and DR-4.6	DR-20/30	South Coast	15.69
13	St. Vincent's – West	059-130-014 059-130-015	DR-1	DR-20/30	South Coast	33.37
14	Hope Community Church	057-143-001	8-R-1	DR-20/30	South Coast	2.95
15	Van Wingerden 1	004-013-023	AG-I-5	DR-20/30	South Coast	15.1
16	Van Wingerden 2	004-005-001	AG-I-10	DR-20/30	South Coast	9.68
17	Montessori	065-080-024 065-080-008 065-080-009	AG-I-5	DR-30/40	South Coast	11.4
18	Friendship Manor	075-020-035	SR-H-20	DR-30/40	South Coast	1.2
19	Key Site 1	129-120-024	C-2	C-2 and MR-O	Santa Maria	24.71
20	Key Site 3	129-151-026	MR-O	DR-1	Santa Maria	8
21	Key Site 10	103-740-016 103-740-017	PRD	DR-20/30	Santa Maria	16.7
22	Key Site 11	103-181-006	C-2 and REC	DR-20/30 and C-2	Santa Maria	21.43
23	Key Site 16	105-330-001 105-330-002	SC	DR-30/40 and C-2	Santa Maria	11.78
24	Key Site 26	107-250-019 107-250-020 107-250-021 107-250-022	C-2	C-2 and DR-30/40	Santa Maria	43.67
25	Mariposa Real	107-590-001 107-580-027	DR-3.3	DR-20/25	Santa Maria	10.83
26	Northpoint HOA	107-470-003	DR-3.3	DR-20/25	Santa Maria	8.75
27	Boys and Girls Club	107-470-011	DR-3.3	DR-20/25	Santa Maria	14.9

Table 2-13. List of Potential Rezone Sites, Pending Project Sites, and County-Owned Sites Included in the Sites Inventory (Continued)

#	Site Name	APN(s)	Current Zoning	Potential Zoning	RHNA Subregion	Size (Acres)
28	Woodmere Villas HOA	107-250-017 107-770-027	DR-3.3	DR-20/25	Santa Maria	17.55
29	Hummel Cottages	107-270-051	DR-4.6	DR-20/25	Santa Maria	4.47
30	Latter Day Saints	109-040-001	8-R-1	DR-30/40	Santa Maria	4.83
31	Element Church	103-080-048	10-R-1	DR-20/30	Santa Maria	3.83
32	Fong 1	097-491-007	7-R-1	DR-30/40	Lompoc	2.36
33	Fong 2	097-492-007	7-R-1	DR-30/40	Lompoc	2.35
34	Alexander 1	097-371-071	SC	C-2	Lompoc	1.63
35	Chumash LLC	143-220-005 143-220-007 143-261-002	C-2 and REC	DR-30/40	Santa Ynez	5.89
36	Blue Sky Property	149-290-001	AG-I-10	C-2 and DR-20	Cuyama	37.88
Pending Projects Considered in the Program EIR Analysis						
37	Bailard	001-080-045 001-080-046	3-E-1	DR-20	South Coast	6.98
38	4555 Hollister Apartments	061-070-002	DR-20	N/A	South Coast	1.1
39	2085 State Street	061-110-014	MU	N/A	South Coast	1.71
40	Hillside House	047-010-039	DR-4.6	N/A	South Coast	24.32
41	MTD	059-140-004 059-140-005 059-140-006 067-230-026	DR-0.2 and DR-20	N/A	South Coast	18.56
42	Tatum	065-040-026	DR-20 and 10-E-1	DR-20/30	South Coast	23
43	Miramar	009-333-013	C-V	N/A	South Coast	1
44	Biltmore	009-351-012	C-V	N/A	South Coast	2
45	Apollo Way	097-371-075	C-2 and DR-12	DR-12	Lompoc	26.11
46	Constellation	097-371-072	SC	C-2	Lompoc	5.16
47	Perkins Place	149-051-002 149-051-001	C-2	N/A	Cuyama	1.08
48	Price Ranch	101-130-016 101-130-019	PRD-46	N/A	Santa Ynez	17.79
County-Owned Sites Considered in the Program EIR Analysis						
49	Juvenile Hall	061-040-012 061-040-023 061-040-024	REC	REC	South Coast	11.08
50	Fire Station No. 12	061-040-030	REC	REC	South Coast	0.57

Table 2-13. List of Potential Rezone Sites, Pending Project Sites, and County-Owned Sites Included in the Sites Inventory (Continued)

#	Site Name	APN(s)	Current Zoning	Potential Zoning	RHNA Subregion	Size (Acres)
51	County Probation	029-211-025	N/A	N/A	South Coast	0.97
52	DignityMoves	029-212-019	N/A	N/A	South Coast	0.22
53	Food Bank	061-040-019 061-040-020 061-040-021	REC	REC	South Coast	0.35
54	Ben Page	061-040-043	REC	REC	South Coast	20.38
55	County Public Health	059-140-029	REC	REC	South Coast	61.86

Source: Appendix D, Housing Element Update
Notes: The Program EIR describes seven County-owned sites included in the sites inventory, whereas Appendix D of the HEU identified nine County-owned sites. This discrepancy is due to three of the sites being located on a single APN (Calle Real Campus), which have been treated as a single site (Site No.55 [County Public Health]) for the purposes of the buildout and EIR analysis due to the shared site attributes. However, the information for this Site No. 55 (County Public Health) and the Buildout Appendix accurately reflects the total housing units identified for the three sites listed in Appendix D of the HEU (Archives Parking Lot, Child Family Services Parking Lot, Above Behavioral Wellness Park Deck).

2.4 Required Actions and Approvals

As described in Chapter 1, *Introduction*, the County is the Lead Agency for the Housing Element Update, consistent with CEQA Guidelines Section 15065(b). As such, the County will use this Program EIR to evaluate the potential environmental impacts that could result from the implementation of the proposed Project and implement mitigation measures that would address those impacts.

In addition to the required CEQA actions (e.g., certification, findings, and statement of overriding considerations), the following supplemental regulatory and/or legislative actions are required:

- Board of Supervisors adoption of amendments to the Comprehensive Plan and community plans, as applicable, and the County zoning ordinances to implement certain Housing Element Update programs, including changes to existing text and/or maps.
- California Coastal Commission certification of amendments to the County Local Coastal Program to implement certain Housing Element Update programs.

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Chapter 3
Environmental Impact Analysis

3.0 Introduction and Approach to Analysis

This chapter of the Program Environmental Impact Report (EIR) analyzes the potential environmental impacts that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). As described in Chapter 2, *Project Description*, the Housing Element Update provides goals, policies, and programs for the County to implement to meet its Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for the lower- to moderate-income affordability level and associated rezones over the next 8 years (Section 2.3, *Housing Element Update*). This Program EIR evaluates the reasonably foreseeable environmental consequences of development enabled under the Housing Element Update through 2031 and identifies mitigation measures and alternatives to the proposed Project that could avoid or reduce potentially significant adverse environmental impacts. Where mitigation is not feasible to reduce or avoid a potentially significant adverse environmental impact, the lack of feasible mitigation is discussed.

As described in Chapter 1, *Introduction*, potential environmental impacts are addressed programmatically in this EIR because the proposed Project would implement the Housing Element Update's goals, policies, and programs, which would compel commensurate changes to the Land Use Element and the County's zoning ordinance. The proposed Project and these implementation actions (including the potential rezones) do not involve specific development plans or housing project proposals. Rather, this programmatic analysis considers the policies and programs that would enable the production of housing at varying affordability levels in the unincorporated areas of the county's five Housing Market Areas (HMAs; Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and South Coast). While the details for future housing development projects are unknown and speculative, this Program EIR estimates the reasonably foreseeable location and extent of housing development associated with the proposed Project based on the maximum potential buildout of the sites inventory included in the Housing Element Update.

3.0.1 Impact Analysis Guidelines

The California Environmental Quality Act (CEQA) requires an EIR analysis to "identify and focus on the significant environmental effects of a proposed project" (CEQA Guidelines Section 15126.2[a]). The emphasis of the EIR should be placed on the potential "physical" adverse effects of a proposed project. CEQA Guidelines Section 15360 defines "environment" as the physical conditions that exist within the area that would be affected by a proposed project including, but not limited to, land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. CEQA Guidelines Section 15360 further defines the "area involved" as the area in which significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions.

CEQA Guidelines Section 15382 clarifies the definition of "significant effect on the environment" as a substantial, or potentially substantial, adverse change in any of the *physical* conditions within the area affected by the project. An economic or social change by itself shall not be considered a significant

effect on the environment. However, economic or social change that may have a *physical* impact (e.g., urban decay) should be considered in an EIR (*Bakersfield Citizens for Local Control v. City of Bakersfield [2004] 124 Cal.App.4th 1184*).

For each environmental issue area, thresholds for determining impact significance are identified based on the CEQA Guidelines and County-adopted thresholds described in the County's *Environmental Thresholds and Guidelines Manual* (2021), along with descriptions of the methodologies used for conducting the impact analysis. For some resource areas, such as air quality, noise, and transportation, the analyses of impacts are more quantitative and involve the comparison of effects against adopted numerical thresholds. For other topics, such as land use and planning, the analyses of impacts are inherently more qualitative, involving the consideration of a variety of factors such as adopted County policies.

3.0.2 Organization of Environmental Impact Analysis

Each section of this chapter (Sections 3.1 through 3.16) addresses an environmental issue area and sets forth the following information for each component of the proposed Project:

- **Introduction.** Introduces the issue area and provides a general approach to the assessment.
- **Environmental Setting.** Describes the baseline conditions within unincorporated areas, including conditions by HMA as appropriate, as they relate to the environmental resource area under review. According to the CEQA Guidelines, the existing setting normally constitutes the physical baseline conditions by which the lead agency determines whether an impact is significant. The existing environmental setting includes all developed and undeveloped lands that may be affected by the proposed Project.
- **Regulatory Setting.** Summarizes the federal, state, and local regulations, plans, and standards that apply to the proposed Project and relate to the specific issue area under review.
- **Environmental Impact Analysis.** Discusses the significance criteria, the environmental impact analysis, and mitigation measures that may be necessary to reduce environmental impacts and the residual impacts following the implementation of recommended mitigation measures.
    - **Thresholds of Significance.** Identifies the significance criteria or, where applicable, the thresholds of significance that will be used to evaluate impacts. The criterion or threshold for a given environmental effect is the level at which the County finds the effect to be significant. The significance criteria can be a quantitative or qualitative standard, or set of criteria, pursuant to which the significance of a given environmental effect may be determined (CEQA Guidelines Section 15064.7).
        - **Methodology.** Outlines the general approach taken in evaluating the individual environmental resource area, if applicable. The methodology is laid out to provide a context for the analysis of impacts.
    - **Project Impacts.** The environmental analysis considers the potential impacts resulting from short-term construction and long-term operational activities associated with the proposed Project. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions from the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970*:

- *Significant and Unavoidable Impacts*: Potentially significant impacts that cannot be feasibly mitigated or avoided. No measures could be taken to avoid or reduce these adverse effects to insignificant levels. Even after the application of feasible mitigation measures, the residual impact would be significant. If the proposed Project is approved with significant and unavoidable impacts, decision-makers must adopt a Statement of Overriding Considerations (SOC) pursuant to CEQA Guidelines Section 15093 explaining why the benefits of the proposed Project outweigh the potential damage caused by these significant unavoidable impacts.
- *Significant but Mitigable Impacts*: Potentially significant adverse impacts that can be feasibly mitigated or avoided. If the proposed Project is approved with significant but mitigable impacts, decision-makers are required to make findings pursuant to CEQA Guidelines Section 15091, stating that impacts have been mitigated to the maximum extent feasible and the residual impact would not be significant.
- *Insignificant Impacts*: These adverse but insignificant impacts do not require mitigation, and they do not require findings to be made. Mitigation measures may still be recommended to improve consistency with policies in the County's Comprehensive Plan.
- *No Impacts*: No adverse changes in the environment would result from the implementation of the proposed Project.
- *Beneficial Impacts*: Implementation of the proposed Project would result in impacts that would be beneficial to the environment.

- **Cumulative Impacts.** This section describes impacts that could occur from the combined effect of other past, present, and reasonably foreseeable future projects.
- **Mitigation Measures.** For each significant adverse impact identified, mitigation measures are presented where feasible to reduce the impacts to acceptable levels (Section 3.0.6, *Cumulative Impacts Analysis*) (CEQA Guidelines Section 15130).
- **Secondary Impacts.** This section identifies secondary effects resulting from the implementation of proposed mitigation measures that could generate a significant adverse impact on the environment or exacerbate impacts caused by the implementation of the proposed Project.
- **Residual Impacts.** This section identifies impact categories after mitigation is applied. (See also, Section 3.0.5, *Mitigation Measures and Monitoring.*). Based on the criteria above, the environmental impact analysis assesses each issue area to determine the significance level. In those instances where mitigation measures cannot reduce adverse impacts to significant but mitigable levels, impacts are categorized as significant and unavoidable impacts.

3.0.3 Impact Assessment Methodology

Key CEQA Principles Guiding the Program EIR Analysis

The CEQA Guidelines identify key principles that allow for a complete understanding of the environmental context, impacts analysis methods, and conclusions presented in this Program EIR. These principles are intended to inform the reader and facilitate objective and sound interpretation of the analyses and conclusions presented in the Program EIR by decision-makers. According to CEQA Guidelines Section 15021, public agencies must avoid or minimize environmental damage where

feasible but also balance a variety of public objectives, including economic, environmental, and social factors. In determining the significance of potential environmental effects, CEQA Guidelines Section 15064 requires findings of significance of each adverse effect and indicates that findings shall be based on scientific and factual data and in consideration of substantial evidence in the whole record before a lead agency. CEQA Guidelines Section 15144 notes that drafting an EIR necessarily involves some degree of forecasting, and while foreseeing the unforeseeable is not possible, an agency must use its best efforts to discover and disclose all that it reasonably foresees using a general "rule of reason." CEQA Guidelines Section 15145 notes that if, after a thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate the discussion of the impact. This section deals with a difficulty in forecasting where a thorough investigation is unable to resolve an issue and the answer remains purely speculative.

Establishing the Baseline Environmental Conditions

Baseline conditions are defined as the existing environmental setting that may be affected by the proposed Project (CEQA Guidelines Section 15125[a]). Baseline conditions are the local and regional conditions as they existed at the time of the proposed Project's Notice of Preparation (NOP), the final version of which was published on July 21, 2022 and a revised NOP which was published on August 11, 2022. Project impacts are defined as changes to the environmental setting that are attributable to the implementation of the proposed Project. Physical changes that could ultimately result from the implementation of the proposed Project, such as rezoning of agricultural land to permit the development of housing or increasing allowable density at a site to develop housing would affect the existing environmental setting (e.g., loss of active crops, increases in air emissions, noise, or vehicle miles traveled, and potential for ground disturbance and associated erosion).

As the Project area includes unincorporated communities that lie within the five HMAs, vacant and non-vacant lands identified in the proposed Project's sites inventory within these areas are the primary focus of the Program EIR discussions and analysis. Some areas that may be subject to potential rezoning as part of the Housing Element Update contain existing development and land uses, such as golf courses, commercial areas, and agricultural lands, and are therefore included as part of the baseline condition. Additionally, these housing focus areas are served by various levels of active transportation infrastructure (e.g., bicycle paths, trails, and sidewalks), urban services (e.g., public transit), and water, wastewater, and other infrastructure, and as such are included in the baseline discussion and analysis of impacts.

Each resource section of this chapter describes existing conditions for the resource that may be affected by the proposed Project. Information on the existing environmental baseline has been obtained from desktop reviews (e.g., review of the California Natural Diversity Database [CNDDB], National Wetland Inventory [NWI], EnviroStor database), existing literature reviews (e.g., Natural Resources Conservation Service [NRCS] soil surveys of Santa Barbara County), existing EIRs for other projects in the county, and the preparation of technical studies (e.g., air quality and greenhouse gas [GHG] analyses, noise calculations, and transportation study) prepared specifically for the County to analyze the potential impacts of the proposed Project.

Impact Assessment Assumptions and Buildout Scenarios

As discussed in Chapter 2, *Project Description*, the Housing Element Update establishes several goals, policies, and programs to facilitate housing development to meet the County's RHNA plus a 15 percent buffer for the lower- and moderate-income affordability levels. As a result, the Housing Element Update has planned to meet a need for 6,240 new units. However, consistent with Government Code

65583(a)(3), to demonstrate the County has sufficient land at appropriate densities and development standards to accommodate the RNHA plus a 15 percent buffer, the County prepared the sites inventory that shows, in part, the number of housing units that could result from the County's existing housing capacity from five categories of sites: 1) vacant sites (under existing zoning capacity); 2) projected Accessory Dwelling Units (ADUs); 3) pending projects; 4) potential County-owned sites; and 5) potential rezone sites.[1, 2] A detailed discussion of the County's methodologies and assumptions used in developing the sites inventory and the realistic buildout scenario is included in Appendix D, *Housing Sites Inventory and Methodology* of the Housing Element Update.

To support a reasonable worst-case analysis of potential impacts, this Program EIR evaluates the proposed Project as a whole and considers the maximum potential buildout capacity scenario of the sites inventory, including all potential land use and zoning amendments identified in the Housing Element Update's programs and its sites inventory. Specifically, the Program EIR analyzes the potential buildout of the County's sites inventory considering the County's existing zoning regulations, proposed zoning changes, and potential density bonuses afforded for housing projects qualifying for the State Density Bonus Law (SDBL). As a result, the maximum potential buildout scenario estimates that substantially more housing could be developed under the proposed Project than estimated in the Housing Element Update's sites inventory. The maximum potential buildout scenario estimated for this Program EIR is a theoretical assessment of zoning capacity and does not modify or replace the Housing Element Update's assessment of realistic capacity provided in the sites inventory.

Further, as described in Chapter 2, *Project Description*, the proposed Project includes implementation of Program 1 of the Housing Element Update (i.e., Proposed Rezone Program), which requires action by the County Board of Supervisors to eliminate some sites and select the number of housing sites necessary to accommodate RHNA plus a 15 percent buffer for lower- and moderate-income households. Because the results of this future rezone site selection process are not foreseeable, this Program EIR analyzes the programmatic impacts of: 1) all vacant sites (under existing zoning); 2) pending projects; 3) all potential County-owned sites; and 4) all potential rezone sites. The Program EIR analysis does not assess programmatic impacts from projected ADUs that are exempt from CEQA and discretionary permits. Key considerations and assumptions made in the development of the maximum capacity buildout scenario for supporting the reasonable worst-case analysis of potential impacts are as follows:

- **Existing Vacant Sites:** The sites inventory includes nearly 500 vacant sites on the South Coast and in the North County. These sites include those sites identified by the County comparing the County Assessor's tax database of parcels within the unincorporated county that are classified as vacant and are zoned for residential use under the County's zoning ordinances. The vacant sites inventory also includes some vacant sites not in a residential zone, but in a designated Urban Area where the zoning ordinances allow residential uses (e.g., certain commercial zones; see *Commercial and Mixed Use Sites* bullet item below). Where parcels are large enough to subdivide under existing zoning ordinances, the County calculated the potential units on all potential lots. Some vacant sites in the county have environmental

[1] While ADUs are expected to contribute to meeting the County's RHNA, it is noted that ADUs are exempt from CEQA and discretionary permits per California Government Code Sections 65852.2 and 65852.22.

[2] The County's sites inventory documents the status of potential housing sites (i.e., pending projects and potential rezone sites) as of June 2023. The categorization of sites does not affect the impact analysis for the purposes of CEQA and has not been updated to reflect any preliminary applications submitted under SB 330 ("Builders Remedy") after June 2023.

constraints that may reduce their potential for residential development (e.g., steep slopes, flood hazards, or environmentally sensitive habitat). The County excluded or reduced the capacity of vacant sites affected by known environmental constraints in the sites inventory. The County also excluded from the vacant sites inventory sites subject to Williamson Act contracts. For the purposes of CEQA analysis, the Program EIR maximum buildout scenario calculated the buildout of vacant sites included in the sites inventory based on the existing zoning and the maximum residential density of the site (i.e., parcel acreage x designated residential dwelling units/acre [du/ac]), rounding up to the nearest whole number for sites which could support greater than one dwelling unit. The Program EIR maximum buildout scenario includes consideration of SDBL for sites that would support a base capacity of 5 or more dwelling units. (See *State Density Bonus Law* bullet item below.) For existing vacant sites that are not in a residential zone but zoning ordinances allow residential uses, potential units under the Program EIR maximum buildout scenario were calculated consistent with methodology for the treatment of commercial and mixed use zones. (See *Commercial and Mixed Use Sites* bullet item below.)

- **Pending Projects:** The Housing Element Update acknowledges 30 pending residential development projects that propose the development of 1,970 units on the South Coast and 936 units in the North County that are currently in various stages of review or construction, such as pre-application in progress, planning permit in progress or approved, and building permit in progress or approved. Government Code Section 65583.1 allows cities and counties to apply units from these pending housing projects towards its RHNA. The County has distinguished which of those pending projects are subject to programmatic environmental review as part of this Program EIR, and which of those pending projects are currently undergoing separate discretionary permitting and environmental review by the County or University of California. Table 3-1 below summarizes the list of pending projects that are subject to programmatic environmental review as part of this Program EIR. The Housing Element Update sites inventory lists the number of units proposed as part of these projects, based on preliminary planning applications and plans submitted by developers to the County. Given the capacity of each of these sites is based on existing planning applications and site plans, the Program EIR maximum buildout scenario includes the capacity of these sites as presented in the sites inventory. No special considerations or modified buildout calculations were applied to these pending projects for the Program EIR maximum buildout scenario.

Table 3-1. List of Pending Projects Considered in the Program EIR Analysis

No.	Site Name	APN(s)	Current Zoning	Proposed Zoning	RHNA Subregion	Size (Acres)
37	Bailard	001-080-045 001-080-046	3-E-1	DR-20	South Coast	6.98
38	4555 Hollister Apartments	061-070-002	DR-20	N/A	South Coast	1.1
39	4085 State Street	061-110-014	MU	N/A	South Coast	1.71
40	Hillside House	047-010-039	DR-4.6	N/A	South Coast	24.32
41	MTD	059-140-004 059-140-005 059-140-006 067-230-026	DR-0.2 and DR-20	N/A	South Coast	18.56

Table 3-1. List of Pending Projects Considered in the Program EIR Analysis (Continued)

No.	Site Name	APN(s)	Current Zoning	Proposed Zoning	RHNA Subregion	Size (Acres)
42	Tatum	065-040-026	DR-20 and 10-E-1	DR-20/30	South Coast	23
43	Miramar	009-333-013	C-V	N/A	South Coast	1
44	Biltmore	009-351-012	C-V	N/A	South Coast	2
45	Apollo Way	097-371-075	C-2 and DR-12	DR-12	Lompoc	26.11
46	Constellation	097-371-072	SC	C-2	Lompoc	5.16
47	Perkins Place	149-051-002 149-051-001	C-2	N/A	Cuyama	1.08
48	Price Ranch	101-130-016 101-130-019	PRD-46	N/A	Santa Ynez	17.79

The other 18 pending projects not listed in the Table 3-1 above include pending projects that are currently undergoing separate discretionary permitting processes and environmental review by the County or University of California and if approved, are likely to occur regardless of the proposed Project. It is not the purpose nor the intent of this Program EIR to satisfy the environmental review requirements for these independent cumulative development projects undergoing separate environmental review. Therefore, for this Program EIR, these pending projects are treated as separate, cumulative development projects and, as such, are not considered in the environmental analysis or the maximum capacity buildout scenario that would result from the Housing Element Update adoption. However, consideration of the impacts of these pending projects, in addition to the impacts of the proposed Project, is considered in the cumulative analysis of each resource section. See Section 3.0.6, *Cumulative Impact Analyses* and Table 3-8.

- **Potential County-owned Sites:** The Housing Element Update includes seven potential County-owned sites that were identified as suitable for high-density housing projects on the South Coast. The sites inventory identified the potential capacity for residential development of these sites based on concept plans and densities developed by the County. Given these are County-owned sites in which the County may retain ownership of the sites and will likely control the affordability level of future units at each site, the Program EIR maximum buildout scenario includes the capacity of these sites as presented in the sites inventory. No special considerations or modified buildout calculations were applied to potential County-owned sites for the Program EIR maximum buildout scenario.

- **Potential Rezone Sites:** The sites inventory includes potential sites that could accommodate new housing if rezoned for residential use or rezoned to allow higher density as part of Program 1, Adequate Sites for RHNA and Monitoring of No Net Loss, of the Housing Element Update (Potential Rezone Program). The Potential Rezone Program identifies more sites than necessary to provide the opportunity for public feedback and decision-maker choice in selecting sites as part of the proposed Project. The County Board of Supervisors will have the authority to select the housing sites necessary to accommodate the RHNA plus a 15 percent buffer for lower- and moderate-income affordability levels. However, for CEQA purposes, to provide for reasonable worst-case analysis, all potential rezone sites identified in Table 2-13 are considered in the Program EIR's analysis. As such, the Program EIR's maximum capacity buildout scenario includes consideration of the maximum potential residential development

from all of these sites based on the proposed zoning and the maximum residential density of the site. In developing the list of potential rezone sites, the County proposed new zoning designations for each site. Each of these proposed new zoning designations includes a minimum and maximum residential density (e.g., DR-20/30 [minimum/maximum]), as required by the state. The Housing Element Update includes the realistic capacity for these rezone sites using the minimum density of the proposed new zoning designations assigned to each site, as well as a revised developable site acreage that factored in some environmental constraints/considerations (e.g., steep slopes, flood hazards, or environmentally sensitive habitat), as a conservative estimate to ensure that housing production would meet the County's RHNA plus the 15 percent buffer, as required by the California Department of Housing and Community Development (State HCD). However, it is reasonably foreseeable that the development of these sites could occur based on the maximum density of the proposed new zoning designations and in some cases, maximum site acreage. Therefore, to provide a conservative estimate of residential buildout under the Potential Rezone Program, the maximum potential buildout scenario calculates the total units of the potential rezone sites using the proposed maximum residential density and total site acreage under the proposed Project.

  - For example, on a 15-acre parcel proposed to be rezoned DR-20/30 (minimum/maximum), the maximum base capacity of the site would be 450 units (15 acres x 30 du/ac = 450 units). While this potential buildout substantially exceeds that forecast in the Housing Element Update, CEQA requires the use of a reasonable worst-case scenario to assess environmental impacts. In contrast, the Housing Element Update presents a realistic minimum buildout approach, which is conservative to ensure housing targets are met and comply with state housing law.

- **State Density Bonus Law:** Development of the maximum capacity buildout scenario for this Program EIR conservatively includes consideration of SDBL (Government Code Sections 65915-65918), which allows developers to build more residential units than would otherwise be allowed by the County's zoning ordinances. Under SDBL, developers that create five or more dwelling units would be eligible for a density bonus if a specific percentage of units are provided at specific affordable rents or sale prices (County Land Use and Development Code [LUDC] Chapter 35.32). In calculating the maximum capacity buildout for the Housing Element Update, the Program EIR consultant conservatively assumed any potential housing site that would allow for five or more dwelling units would be eligible for bonus density. The maximum potential buildout scenario accounts for projected bonus density by applying the County's affordability methodology of the Housing Element Update to each site eligible for SDBL (sites with five or more dwelling units). As described in Appendix D, *Housing Sites Inventory and Methodology* of the Housing Element Update, for sites zoned for 20 or more units per acre on the South Coast, the County calculated affordability levels as follows:

  - 50 percent of all possible units to the lower-income level;
  - 25 percent to the moderate-income level; and
  - 25 percent to the above moderate-income level.

  The County's North County sub-region typically produces more affordable housing than the South Coast. As a result, the County applied the following percentages to calculate the

affordability levels of potential units on vacant sites zoned for 20 or more units per acre in the North County:

- For sites proposed for 20 to 25 units per acre:
  - 65 percent of all possible units to the lower-income level
  - 25 percent to the moderate-income level
  - 10 percent to the above moderate-income level
- For sites proposed for 25 to 30 units per acre:
  - 70 percent of all possible units to the lower-income level
  - 25 percent to the moderate-income level
  - 5 percent to the above moderate-income level
- For sites proposed for 30 or more units per acre:
  - 75 percent of all possible units to the lower-income level
  - 25 percent to the moderate-income level
  - The County has no vacant sites zoned for 20 or more units per acre.

Based on the affordability mixes in both the South Coast and the North County, eligible sites would qualify for a bonus of 30 percent density. For example, a 5-acre site zoned DR-20 could be developed with 100 units under existing zoning. With SDBL, an additional 30 units could be allowed, resulting in a total of 130 units of development.

For sites allowing five or more dwelling units, but zoned for less than 20 units per acre, the maximum potential buildout scenario applies the following affordability levels for both the South Coast and the North County:

- 20 percent of all possible units to lower-income level;
- 5 percent to the moderate-income level; and
- 75 percent to the above moderate-income level.

Based on this affordability mix, eligible sites would qualify for a bonus of 10 percent density. For example, a 2-acre site zoned DR-5 could be developed with 10 units under existing zoning. With SDBL, an additional 1 unit could be allowed, resulting in a total of 11 units of development.

- **Commercial and Mixed Use Sites:** The Housing Element Update identifies several existing vacant sites, potential rezone sites, and pending project sites that are currently zoned as or are proposed to be rezoned to commercial uses (C-1 – Limited Commercial, C-2 – Retail Commercial, C-3 – General Commercial, and CM-LA – Community Mixed Use – Los Alamos). The Housing Element Update assumes these sites would be developed consistent with the County's development standards for mixed use development (LUDC Section 35.42.200). In calculating the total capacity of residential development of these sites as mixed use projects, the maximum potential buildout scenario employed in the Program EIR assumes each site would be developed with 50 percent of the gross lot area as ground floor commercial uses,

and up to two additional stories developed as residential uses, provided that the total gross floor area of residential uses shall not exceed the total gross floor area of the commercial use (e.g., 50 percent of the gross lot area). In calculating the total number of residential units, the Program EIR conservatively assumes that the average size of such units would be 500 square feet in size.

- For example, on a 0.46-acre parcel, 50 percent of the gross lot area would be developed as ground floor commercial uses, resulting in a potential buildout of up to 10,000 square feet of commercial development. With a gross floor area of 10,000 square feet (100 percent of the gross floor area of ground floor commercial), each above-ground floor could be developed with up to 20 new dwelling units, resulting in a total of 40 new dwelling units. Bonus density afforded for SDBL qualifying sites was then also calculated and added to the base capacity to determine the maximum residential capacity of the site. ***For mixed use projects, the bonus density afforded through SDBL is assumed to be accommodated on a fourth story.***

As summarized in Table 3-2 below, under this maximum capacity buildout scenario, implementation of the Housing Element Update could result in the development of up to 34,558 new residential units on 2,877.77 acres of land that could be developed during the 2023-2031 planning horizon. An estimated 1,617 units (4.6 percent) would be single-family dwellings (SFDs) and an estimated 33,185 units (95.4 percent) would be multifamily dwellings (MFDs) (Table 3-3). Appendix B of this Program EIR provides the detailed calculations, assumptions, methodologies, and site information used in calculating this maximum potential buildout scenario.

Table 3-2. County Site Inventory Maximum Potential Buildout for Program EIR Analysis

	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Total Units					
Existing Vacant Sites	528	143	2,929	544	--
Rezones	16,102	428	9,911	305	1,812
County-owned Sites	320	--	--	--	--
Pending Projects	1,092	350	--	61	33
Total	18,042	921	12,840	910	1,845
Total by RHNA Region	18,042	16,516			
Total Unincorporated County	**34,558**				
Affected Acreage					
Existing Vacant Sites	708.20	35.72	784.56	58.33	--
Rezones	418.98	6.34	191.45	5.89	37.88
County-owned Sites	219.15	--	--	--	--
Pending Projects	149.55	46.85	192.36	21.43	1.08
Total	1,495.88	88.91	1,168.37	85.65	38.96
Total by RHNA	1.495.88	1,381.89			
Total Unincorporated County	**2,877.77**				

Source: Appendix B.

Table 3-3. County Site Inventory Maximum Potential Buildout of SFDs and MFDs for Program EIR Analysis

	SFDs (% Total Buildout)		MFDs (% Total Buildout)		Total (% Total Buildout)	
South Coast	379	1.1%	17,663	51.1%	18,042	52.2%
North County	994	2.9%	15,522	44.9%	16,516	47.8%
Lompoc	*126*	*0.4%*	*795*	*2.3%*	*921*	*2.7%*
Santa Maria	*698*	*2.0%*	*12,142*	*35.1%*	*12,840*	*37.2%*
Santa Ynez	*170*	*0.5%*	*740*	*2.1%*	*910*	*2.6%*
Cuyama	*0*	*0.0%*	*1,845*	*5.3%*	*1,845*	*5.3%*
Total	1,373	4.0%	33,185	96.0%	34,558	100.0%

Source: Appendix B.

Based on the existing commercial and mixed use zoned sites included in the County's existing sites inventory, as well as the potential buildout of rezone properties, implementation of the proposed Project could accommodate an estimated 1,549,170.8 square feet of new ground floor commercial uses as part of mixed use development (Table 3-4).

Table 3-4. County Site Inventory Maximum Potential Commercial Buildout for Program EIR Analysis

	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Total Commercial Square Footage					
Existing Vacant Sites	14,374.8	3,484.8	355,885.2	79,497.0	--
Rezones	--	35,501.4	804,117.6	--	206,910.0
County-owned Sites	--	--	--	--	--
Pending Projects	--	48,290.0	--	--	1,110.0
Total	14,374.8	87,276.2	1,160,002.8	79,497.0	208,020.0
Total by RHNA Region	14,374.8	1,534,796.0			
Total Unincorporated County	1,549,170.8				

3.0.4 Environmental Resource Areas Analyzed in the Program EIR

The Program EIR is based on the Project Description outlined in Chapter 2, *Project Description*, and evaluates potentially significant environmental impacts, including issues raised in public comments received in response to the Notice of Preparation (NOP) and at public workshops/hearings (Appendix A). This Program EIR evaluates the potential for environmental impacts on the following resource areas:

- Section 3.1, *Aesthetics and Visual Resources*
- Section 3.2, *Agricultural Resources*
- Section 3.3, *Air Quality*
- Section 3.4, *Biological Resources*
- Section 3.5, *Cultural Resources and Tribal Cultural Resources*
- Section 3.6, *Energy*
- Section 3.7, *Greenhouse Gas Emissions*

- Section 3.8, *Hazards and Hazardous Materials*
- Section 3.9, *Hydrology and Water Resources*
- Section 3.10, *Land Use and Planning*
- Section 3.11, *Noise*
- Section 3.12, *Population and Housing*
- Section 3.13, *Public Services and Recreation*
- Section 3.14, *Transportation*
- Section 3.15, *Utilities and Water Supply*
- Section 3.16, *Wildfire*

Sections 3.1 through 3.16 provide a detailed discussion of the environmental setting, impacts associated with the proposed Project, and mitigation measures designed to reduce potentially significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measures and cumulative impacts also are discussed. The secondary impacts that could result from the implementation of any mitigation measures are also discussed. Additionally, Chapter 5, *Other CEQA Considerations,* identifies other environmental resource areas. In accordance with CEQA Guidelines Section 15128 (Effects Not Found to Be Significant), environmental impacts related to Forestry, Geology and Soils, and Mineral Resources would be insignificant; therefore, environmental impacts associated with these resources are addressed in Chapter 5, *Other CEQA Considerations*. Chapter 5 also addresses the growth-inducing effects of the proposed Project.

3.0.5 Mitigation Measures and Monitoring

Pursuant to CEQA Guidelines Section 15126.4, where potentially significant environmental impacts have been identified in the Program EIR, feasible mitigation measures that could avoid or minimize the severity of those impacts are also identified. The mitigation measures are identified as part of the analysis of each impact topic in Sections 3.1 through 3.16 of this Program EIR.

Feasible means *"capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors"* (CEQA Guidelines Section 15364). A lead agency must impose mitigation measures unless findings can be made that the mitigation measures are found to be infeasible or within the jurisdiction of another agency (*City of Marina v. Board of Trustees of the California State University [2006] 39 Cal.4th 341*). Mitigation measures must be fully enforceable and may involve various means of implementation, such as:

- Measures incorporated into the County's zoning ordinances as development standards that will be applied to future individual projects that implement the Housing Element Update.
- Measures incorporated as standard conditions of approval for individual projects that implement the Housing Element Update.
- Measures implemented in multi-year County programs or development impact fee programs.

CEQA requires that the implementation of adopted mitigation measures or any revisions made to the proposed Project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 requires that a public agency adopt a Mitigation Monitoring or Reporting Program (MMRP) for those adopted mitigation measures and project revisions. That is, the monitoring plan may consist of policies included in plan-level documents (CEQA Guidelines Section 15097[b]). The MMRP will be provided as Chapter 8, *Mitigation Monitoring and Reporting Program* following public review and preparation of the Final Program EIR.

3.0.6 Cumulative Impacts Analyses

CEQA Guidelines Section 15130 requires that cumulative impacts be analyzed in an EIR when the resulting impacts are cumulatively considerable and, therefore, potentially significant. Cumulative impacts refer to the combined effect of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. The discussion of cumulative impacts must reflect the severity of the impacts as well as the likelihood of their occurrence. However, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Further, the discussion should remain practical and reasonable in considering other projects and related cumulatively considerable impacts. According to CEQA Guidelines Section 15355:

> "Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
>
> (a) The individual effects may be changes resulting from a single project or several separate projects.
>
> (b) The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Further, according to CEQA Guidelines Section 15130(a)(1) "…a 'cumulative impact' consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."

In addition, as stated in the CEQA Guidelines Section 15064(i)(5), "[t]he mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the Proposed Project's incremental effects are cumulatively considerable."

Therefore, the cumulative impact discussion focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of combined impacts caused by other past, present, or future projects. The main determinant for purposes of inclusion and evaluation in the cumulative impact analysis is whether an individual project, program, policy initiative, or conceptual future project would contribute to an impact on an environmental resource or issue area to which the proposed Project also would have an impact. Generally, projects that are located within geographical proximity to each other (e.g., two or more projects located within the same watershed, or utilizing the same roadways) have the potential to contribute to cumulative impacts on an environmental resource or issue area. However, given the geographical distribution and extent of the environmental resource or issue area, projects do not necessarily need to be located within proximity to one another to be included in the cumulative impacts analysis.

The CEQA Guidelines allow for the use of two different methods to determine cumulative impacts:

- **List Method** – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (CEQA Guidelines Section 15130).
- **General Plan Projection Method** – A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document that has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact (CEQA Guidelines Section 15130).

Consistent with the CEQA Guidelines methodology for cumulative impact analysis, the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970* provide that various methods can be utilized for assessing a project's contribution to cumulative impacts, dependent upon the nature of the impact and its areal extent. The County of Santa Barbara Planning & Development Department (P&D) generally employs or recommends that the cumulative impact evaluation be based on a specific cumulative project list (i.e., List Method). The list should be extensive enough to contain all projects that could have a substantial effect on the resource to be significantly impacted by the project. The County guidelines state that the cumulative project list should include the following:

1. Projects that are partially occupied or under construction;
2. Projects approved by decision-makers;
3. Projects deemed "complete" for processing and are currently undergoing review by lead agencies;
4. Projects that have submitted a pre-application assessment with a lead department and contain a high degree of specificity and probable time frame; and
5. Public projects that are partially occupied, under construction, approved, under review, or proposed, including projects which are included in a capital improvement program, or are reasonably expected to be funded and scheduled.

Though the County's guidelines identify a cumulative project list as the preferred method for assessing cumulative impacts, the guidelines also acknowledge that due to the scope and nature of some impacts, other methods, such as modeling or provision of background data may be more appropriate. For instance, projects that have the potential to cause impacts at a regional scale may create the need for a community or countywide assessment of cumulative impacts (i.e., General Plan Projection Method).

As described in Section 1.1, *Project Overview*, the Housing Element is one of the mandatory general plan elements. The Housing Element Update addresses housing needs and related issues throughout the unincorporated areas of the county. The planning period for the Housing Element Update covers the 2023-2031 RHNA projection period. As such, this Program EIR analyzes cumulative effects using a combination of both the General Plan Projection Method and List Method for all environmental topic issues through the planning horizon year of 2031. This combined approach provides for updated projections of countywide cumulative land use changes that are anticipated to occur in the county through 2031 as a result of the proposed Housing Element Update in conjunction with the County's other long-range planning documents that are currently being prepared, such as the Environmental Justice Element, Recreation Master Plan and Safety Element Update, while also providing for consideration of individual development projects, such as cumulative pending residential development projects which would contribute to the County's RHNA. Because of the countywide nature of the Housing Element Update, the cumulative analysis also includes long-range planning projects and major developments for all eight cities, particularly their Housing Element Updates, along with pending projects at the University of California, Santa Barbara (UCSB).

To develop the cumulative projects list, the County reviewed current work plans to consider program and policy initiatives, and discretionary and ministerial projects throughout the county to identify projects that may have a cumulative effect on the environment. Consistent with the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970* and

recommendations for assessment of cumulative impacts, programs and policy initiatives excluded from the cumulative impact analysis include:

- County policy initiatives and ordinance amendments that are unfunded and not included in a County Board of Supervisors adopted work program.
- County policy initiatives and ordinance amendments that do not cause related impacts to resources evaluated in this Program EIR.
- County policy initiatives and procedural ordinance amendments.
- A County policy initiative or ordinance amendment project description that is unspecified, uncertain, loosely defined, or speculative. This criterion would apply to programs that have not undergone environmental review or been formally initiated by the County Board of Supervisors.
- Projects undertaken by or proposed within other jurisdictions such as the eight incorporated cities and UCSB that would otherwise not affect the environmental resource areas analyzed in this Program EIR.
- Projects that are located outside of the area of potential effect or projects that would otherwise not affect the environmental resource areas analyzed in this Program EIR.

The list of plans, policy initiatives, programs, and discretionary projects that are considered in the cumulative analysis of this Program EIR are listed in Table 3-6 and Table 3-7. A more comprehensive list of current pending or approved discretionary and ministerial projects, which are less likely to contribute towards a cumulative effect on the environment when considered in relation to the proposed Project are listed in Appendix I and predominately include rural agricultural premise improvements and cannabis cultivation projects. Projects that are the pending and recently approved development projects in Santa Barbara County are included in the cumulative impact analysis:

1. The Development Review Division (County of Santa Barbara 2023) tracks all projects that have involved applicant-initiated planning consultation, typically discretionary projects, for cumulative impacts.

   "Projects subject to the cumulative project list are almost exclusively limited to discretionary projects including parcel maps, tract maps, residential projects with more than two units, commercial projects and industrial projects. In rare circumstances a ministerial project may be included if it would result in impacts substantial enough to warrant tracking (e.g., a restaurant below the square footage requiring a Development Plan).

   Project types that are not subject to the cumulative project list and should not be included in the list include ADUs, accessory structures, farm employee housing with two and fewer units, fences, reservoirs, septic systems, SFDs, special events, and walls."

2. Long Range Planning Division staff generated a report from Accela (permit tracking program) that exported the cumulative impact records into a database and identified the projects by HMA.

Further, as previously discussed, the Housing Element Update and sites inventory include consideration of 18 pending residential development projects, the development of which would contribute towards the County's ability to meet the RHNA. For this Program EIR, these pending projects are treated as separate, cumulative development projects and, as such, are not considered in the analysis of buildout under the proposed Project. A list of those pending projects identified in the Housing Element Update and sites inventory is provided in Table 3-8.

CEQA Guidelines Section 15130(b)(2) further states that a program EIR should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used. The geographic scope for the analysis of cumulative impacts in this Program EIR varies by each environmental impact topic (e.g., jurisdiction, air basin, watershed, service area). For most of the impact topics analyzed in this Program EIR, the geographic scope was determined to be limited to the unincorporated areas of the county where Housing Element Update development is suitable for future buildout within the two sub-regions of the South Coast and North County, including the transportation network connecting the unincorporated communities. However, regional issues regarding the supply of water and treatment of wastewater also take into account regional projections, such as those provided by the Santa Barbara Association of Governments (SBCAG) in the Connected 2050 Regional Transportation Plan/Sustainable Communities Strategy (Connected 2050 RTP/SCS). The cumulative analyses for air quality, GHG emissions, and energy also include the full extent of the county and beyond. The cumulative analyses for each environmental issue, including a discussion regarding the identification of relevant cumulative projects are provided in their applicable sections in Chapter 3, *Environmental Impact Analysis*.

Table 3-5. Geographic Context for Cumulative Analysis

Environmental Resource Area	Geographic Context for Cumulative Analysis
Aesthetics and Visual Resources	Santa Barbara County
Agricultural Resources	Santa Barbara County
Air Quality	South Central Coast Air Basin
Biological Resources	Santa Barbara County
Cultural Resources and Tribal Cultural Resources	Santa Barbara County
Energy	**Electricity** – Pacific Gas & Electric Company (PG&E) and Southern California Edison (SCE) service areas **Natural Gas** – Southern California Gas Company (SoCalGas) service area
Greenhouse Gas Emissions and Climate Change	Global
Hazards and Hazardous Materials	Santa Barbara County
Hydrology and Water Quality	Santa Barbara County
Land Use and Planning	Santa Barbara County and SBCAG Planning Area
Noise	Santa Barbara County
Population, Housing, and Employment	Santa Barbara County and SBCAG Planning Area
Public Services (e.g., Fire, Police, Parks, Schools, Libraries)	Santa Barbara County
Transportation	Santa Barbara County and SBCAG Planning Area

Table 3-5. Geographic Context for Cumulative Analysis (Continued)

Environmental Resource Area	Geographic Context for Cumulative Analysis
Utilities	**Water** – Carpinteria Valley Water District (CVWD), City of Santa Barbara, Goleta Water District, Golden State Water Company, La Cumbre Mutual Water Company, Montecito Water District, Santa Ynez River Water Conservation District, Los Alamos Community Service District (CSD), Cuyama CSD, Casmalia CSD, Mission Hills CSD, and Vandenberg Village CSD **Wastewater** – 12 wastewater service providers/districts across the County- Carpinteria Sanitary District, County Service Area 12, Goleta West Sanitary District, Goleta Sanitary District, Montecito Sanitary District, Cuyama CSD, Laguna County Sanitation District, Los Alamos CSD, Mission Hills CSD, Santa Ynez CSD, Summerland Sanitary District, and Vandenberg Village CSD. **Solid Waste** – Waste Management (North County) and MarBorg Industries (South Coast); Tajiguas Landfill, Lompoc Landfill, Santa Maria Regional Landfill, Los Flores Integrated Regional Waste Management Facility (Planned), South Coast Recycling & Transfer Station, Santa Ynez Valley Recycling & Transfer Station, New Cuyama Transfer Station, Ventucopa Transfer Station
Wildfire	Santa Barbara County

Table 3-6. Other Housing Element Updates in Process in Santa Barbara County that Could Impact the Housing Element Update

	Project Name	Description	Location	CEQA Process	Status	Discussion
Comprehensive Planning projects in process.						
1	City of Buellton 2023-2031 Housing Element Update	For the purposes of estimating new units that could be constructed between 2023 and 2031as a result of 6th Cycle Housing Element Update, a conservative estimate of 322 new units constructed was used, which assumes approximately 40 percent of the units anticipated during the planning period by pending Pipeline Projects, accessory dwelling unit (ADUs), affordable housing overlay zone (AHOZ) sites, and vacant residential sites. The RHNA allocation is 165 units.	City of Buellton	Draft Initial Study/ Negative Declaration (IS/ND) published March 2023	In Progress	Addresses the development of housing within the city over the next 8-year planning period.
2	City of Carpinteria 2023-2031 Housing Element	Potential new units to be constructed between 2023 and 2031 as a result of 6th Cycle Housing Element Update is 901 units. Units to be rehabilitated is 30 and units to be preserved is 1,038.	City of Carpinteria	Exempt pursuant to CEQA Guidelines Section 15061(b)(3), the "common sense exemption"	In Progress	Addresses the development of housing within the city over the next 8-year planning period.
3	City of Goleta Housing Element Update (2023-2031)	For 6th Cycle Housing Element Update, the city's RHNA allocation is 1,837. Total housing unit potential is 2,607.	City of Goleta	Exempt pursuant to CEQA Guidelines Section 15061(b)(3), the "common sense exemption"	Housing Element Update adopted 2023	Addresses the development of housing within the city over the next 8-year planning period.

Table 3-6. Other Housing Element Updates in Process in Santa Barbara County that Could Impact the Housing Element Update (Continued)

	Project Name	Description	Location	CEQA Process	Status	Discussion
4	Guadalupe Updated 2023-2031 Housing Element	For the 6th Cycle Housing Element Update, the city's RHNA allocation is 431 units.	Guadalupe	Scope of the CEQA document to be determined	In Progress	Addresses the development of housing within the city over the next 8 year planning period.
5	Housing Element Update for the City of Lompoc (6th Cycle)	For 6th Cycle Housing Element Update, the city's RHNA allocation is 2,248 units. Total potential new construction is 2,500 (plus additional 40 for rehabilitation and 1,247 units for preservation).	City of Lompoc	In Progress CEQA Addendum	Housing Element Update adopted 2023	Addresses the development of housing within the city over the next 8-year planning period.
6	City of Santa Barbara 2023-2031 Housing Element Update	For 6th Cycle Housing Element Update, the city's RHNA allocation is 8,001 units.	City of Santa Barbara	Program EIR in progress	Housing Element Update adopted 2023	Addresses the development of housing within the city over the next 8-year planning period.
7	City of Santa Maria 6th Cycle Housing Element 2023-2031	For 6th Cycle Housing Element Update, the City's RHNA allocation is 5,418 units. Total potential new construction is 5,418 (plus additional 150 for rehabilitation and 6 units for preservation).	Santa Maria	IS/ND completed December 2022.	Housing Element Update adopted 2023	Addresses the development of housing within the city over the next 8-year planning period.
8	City of Solvang 6th Cycle Housing Element 2023-2031	For 6th Cycle Housing Element Update, the City's RHNA allocation is 191 units. Total potential new construction is 208 (plus additional 19 for rehabilitation and 136 units for preservation).	City of Solvang	In Progress EIR	Housing Element Update adopted 2023	Addresses the development of housing within the city over the next 8-year planning period.

Table 3-7. Pending County Planning Projects and Initiatives that Could Impact the Housing Element Update

	Project Name	Description	Location	CEQA Process	Status	Discussion
Comprehensive Planning projects in process.						
9	Utility Grade Solar Ordinance Amendments	Amendments to allow utility-scale solar within the following zones located within the Inland Area of the county: Agricultural I (AG-I); Agricultural II (AG-II); Public Utilities (PU); Light Industry (M-1); General Industry (M-2); Industrial Research Park (M-RP); and Professional and Institutional (PI). Amend the Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones (Uniform Rules) to allow utility-scale solar within agricultural preserve contracted lands, on prime and non-prime farmlands Amend "solar energy system" and "utility-scale solar" definitions, permit requirements, and permit thresholds as needed to streamline permitting of solar photovoltaic systems within the LUDC, Montecito Land Use and Development Code (MLUDC), and Coastal Zoning Ordinance (CZO).	Countywide	Future Program EIR	In progress	Consistent with the recommendations of the County's Strategic Energy Plan, the County is proposing amendments to the Comprehensive Plan, zoning ordinances, and Uniform Rules to allow utility-scale solar development in the county outside of the Utility-Scale Solar Photovoltaic Overlay that currently only allows utility-scale solar facilities on lands zoned AG-II within a 600-acre Overlay in the Cuyama Valley Rural Region.
10	Airport Land Use Compatibility Plan (ALUCP) Comprehensive Plan Consistency Amendments (Mandated)	This project involves amending the Comprehensive Plan to be consistent with the Airport Land Use Compatibility Plans (ALUCPs) for the airports located within the county. Pursuant to Government Code Section 65302.3, the County must	Countywide	IS/ND Adopted January 2023	CEQA completed	In August 2019, SBCAG staff released six draft ALUCPs (one for each airport within the county). In January 2023, SBCAG adopted five draft ALUCPs

Table 3-7. Pending County Planning Projects and Initiatives that Could Impact the Housing Element Update (Continued)

Project Name		Description	Location	CEQA Process	Status	Discussion
		amend its Comprehensive Plan to be consistent with the ALUCPs or adopt findings to overrule the ALUCPs, within 180 days of the ALUCPs' adoption.				(Santa Barbara, Santa Maria, Lompoc, Santa Ynez, and Vandenberg).
11	Comprehensive Plan Environmental Justice (EJ) Element	Preparation and adoption of a new Comprehensive Plan Element to comply with Senate Bill (SB) 1000, which requires cities and counties with disadvantaged communities to incorporate EJ policies into their general plans.	Countywide	Future Notice of Exemption (NOE)	CEQA not initiated	Provides goals and policies that address disadvantaged communities countywide, including populations located in agriculturally zoned lands.
12	Countywide Recreation Master Plan	The Community Development Department, Parks Division is preparing a Countywide Recreation Master Plan. This project will provide a strategic planning program for parks, trails, and recreation facilities throughout Santa Barbara County. The Master Plan will assess existing facilities, address unmet recreation needs, identify a range of recreation improvements, and foster coordination and cooperation between the County, cities, local agencies within the county, and non-profit and private recreation service providers. Key goals include increased interagency cooperation and potentially shared funding programs for needed parks and recreation facilities. The Master Plan will allow the County and participating agencies to better compete for project funding, including California Proposition 68	Countywide	Future Program EIR	In progress	The County is developing potential amendments to its recreation policy framework to guide the long-term provision of parks, recreation, and trails in unincorporated areas. These amendments will provide goals and policies for park and recreation projects and support for implementation of the Countywide Recreation Master Plan, which is currently under development. The amendments will help implement the Recreation Master Plan to meet the needs of communities that currently lack adequate access to parks and recreation facilities.

Table 3-7. Pending County Planning Projects and Initiatives that Could Impact the Housing Element Update (Continued)

Project Name		Description	Location	CEQA Process	Status	Discussion
		grant funding, and to streamline required environmental review.				
13	Accessory Dwelling Unit (ADU) Ordinance Amendments	This project involves updates to the County's Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) ordinances to comply with recent changes to State law, including but not limited to AB 2221.	Countywide	NOE	Adopted	
14	Agriculture Enterprise Ordinance	Zoning ordinances amending the County LUDC and CZO to allow a variety of uses that would be incidental to and compatible with traditional agriculture uses on lands zoned AG-II. One of the uses (incidental food service) is also proposed to be allowed at winery tasting rooms located on lands zoned AG-I. The goal is to expand economic opportunities for farmers and improve the County's overall agricultural land viability while maintaining the function and character of the County's rural agricultural areas. The primary use of the land must continue to be agriculture (e.g., crop cultivation, ranching/grazing).	Countywide	Draft Program EIR published	In progress	This project would allow local farmers and ranchers to pursue incidental and compatible agricultural enterprises that support their existing agricultural operations. Uses include supplemental, supportive agricultural uses (e.g., small-scale agricultural product preparation and processing) and rural recreational or agritourism uses (e.g., small-scale campgrounds, farmstays, educational opportunities, small-scale events). Decision-maker hearings are anticipated to commence in Fall 2023 with the County Planning Commission.
15	Low Barrier Navigation Centers	This project involves updates to the County's zoning ordinances to facilitate the development of Low	Countywide	Future NOE	In progress	This amendment has been drafted and is working to be packaged for the

Table 3-7. Pending County Planning Projects and Initiatives that Could Impact the Housing Element Update (Continued)

Project Name		Description	Location	CEQA Process	Status	Discussion
	Ordinance Amendment	Barrier Navigation Centers in compliance with State law. Updates include permit qualifying low barrier navigation centers by-right in areas zoned for mixed use and non-residential zoned permitting multifamily uses in compliance with AB 101.				Planning Commission and County Board of Supervisors for review.
16	By Right Supportive Housing Ordinance Amendment/AB 2162	This project involves updates to the County's zoning ordinances to permit qualifying supportive housing developments by-right in zones where multifamily and mixed uses are permitted in compliance with AB 2162.	Countywide	Future NOE	In progress	The County is in the progress of drafting the ordinance amendments.
17	Ministerial Housing Development Ordinance Amendment/SB 35	This project involves updates to the County's zoning ordinances to create a ministerial permit path that confirms to the State's permit processing requirements for qualifying housing developments (SB 35).	Inland areas	Future NOE	In progress	A number of updates to the LUDC have been adopted and additional updates are underway.
18	Zoning Ordinance Amendment Project	This project involves a range of updates to the County's zoning ordinances to address various technical updates to the Shopping Center zone district, streamlining the permitting process, and expanding the list of projects that can be exempt or be subject to ministerial permits, and updates to development standards in the multifamily zoning districts to facilitate the development of affordable housing.	Countywide	CEQA TBD	In progress	

Table 3-7. Pending County Planning Projects and Initiatives that Could Impact the Housing Element Update (Continued)

Project Name		Description	Location	CEQA Process	Status	Discussion
19	SDBL Ordinance Amendments	This project involves updates to the County's density bonus provisions to expand the types of projects eligible for a density bonus to bring the ordinance into compliance with changes to State law.	Countywide	Future NOE	In progress	
20	Housing Accountability Act (HAA) Implementation	This project includes updates to the County's zoning ordinances to comply with the HAA and the development of a guidance package as a reference for planning staff and the public to comply with the HAA.	Countywide	Future NOE	In progress	The guidance package is in development and the ordinance amendments have not been initiated.
21	Objective Design Standards	This project will update the County's zoning ordinances to add objective design and planning standards for qualifying multifamily housing developments, supportive housing developments, and LBNCs consistent with SB 35, AB 2162, and AB 101, respectively.	Countywide	Future NOE	In progress	Relevant amendments have been adopted into the LUDC and drafts are under development for the CZO and MLUDC.
22	Seismic Safety and Safety Element Update- Phase I	The Seismic Safety and Safety Element Update will incorporate new policies and programs in compliance with recent State laws to better prepare for risks associated with wildfire and flood hazards and to address climate change hazards. Phase I of the Safety Element Update focuses on wildfire policy amendments, in compliance with current legislative requirements; updated wildfire information, resources, and maps; and incorporation of the 2022 Multi-Jurisdictional Hazard Mitigation Plan	Countywide	Phase I – CEQA Guidelines Section 15061 (b)(3)	In progress	A Climate Change Vulnerability Assessment was completed in Fall 2021. Work on the Adaptation Plan was initiated in Spring 2022. The County Board of Supervisors will consider adoption the Wildfire Policy Safety Element amendments (Phase I) in July 2023.

Table 3-7. Pending County Planning Projects and Initiatives that Could Impact the Housing Element Update (Continued)

Project Name		Description	Location	CEQA Process	Status	Discussion
		(MJHMP) by reference into the Seismic Safety and Safety Element.				
23	2030 Climate Action Plan (CAP)	The 2030 CAP identifies ways the County can reduce greenhouse gas (GHG) emissions and implement energy-saving measures in support of a thriving, well-balanced and sustainable community. The CAP is being prepared to assist the County with reducing its GHG emissions consistent with State AB 32.	Countywide	Draft EIR released	In progress	In February 2023, the County released the Draft 2030 CAP for public comment. Subsequently, the County released the Draft Environmental Impact Report for public comment, which will close on July 27, 2023.
24	San Marcos Pass-Eastern Goleta Valley Mountainous Communities Community Wildfire Protection Plan (CWPP)	The CWPP identifies wildfire hazard mitigation strategies for communities in the San Marcos Pass / Eastern Goleta Valley Mountainous Area that are in balance with sustainable ecological management and fiscal resources. Additionally, the CWPP provides educational resources for residents to enhance wildfire preparedness. The CWPP serves to guide future actions of agencies and individuals but does not legally commit any public agency to a specific course of action.	San Marcos Pass and Eastern Goleta Valley Mountainous Area	N/A	Adopted	The Board adopted this CWPP in 2019.
25	Carpinteria-Summerland Fire Protection District CWPP	The CWPP provides an assessment of the wildfire threat in the wildland urban interface of the Carpinteria-Summerland Fire Protection District.	Carpinteria-Summerland Fire Protection District Area	N/A	Adopted	The County revised and adopted the Carpinteria-Summerland Fire Protection District CWPP in 2021.
26	Solomon Hills Project	The Solomon Hills Project involves proposed General Plan Amendment and Rezone and establishment of a new Urban Boundary outside of and separate from the Orcutt Community	South of Orcutt in Santa Maria Valley, west of U.S.	CEQA TBD	In progress	The General Plan Amendment and Rezone applications were reviewed by the County

Table 3-7. Pending County Planning Projects and Initiatives that Could Impact the Housing Element Update (Continued)

Project Name		Description	Location	CEQA Process	Status	Discussion
		Plan Area. The General Plan Amendment and Rezone would allow for various residential, commercial, institutional, and open space land use designations and accompanying zone designations. This would entail up to 4,000 residential units, a Village Center with traditional retail uses, and an estimated 500,000-600,000 sf of Office Campus.	Highway 101			Planning Commission in March 2023.

Table 3-8. Draft Housing Element Update Pending Projects List

Project Name / Location		APN	Acres	Zoning Designation	Planning Region	Comment[1]
1	Polo Villas 3282 Via Real, Carpinteria, CA 93013	005-270-033 005-270-034 005-270-019 005-270-029	10.9	DR-3.3	South Coast	Former motel. This site is a pending project that will include approximately 25 units. Existing structures on-site will be demolished as per the project plan. The application has been submitted.
2	Galileo Pisa 5317 Calle Real, Santa Barbara, CA 93111	069-525-022	1.53	DR-20	South Coast	Existing orchard that proposes 27 above moderate-income units. Planning permit approved.
3	Patterson Place 80 N Patterson Ave, Santa Barbara, CA 93111	067-200-005	0.54	C-2	South Coast	Vacant lot that proposes buildout of 24 units. Planning permit approved.
4	Ocean Meadows Immediately east of 6969 Whittier Dr, Goleta, CA 93117	073-090-072 073-090-073	6.41	PRD-58	South Coast	One existing SFD. The majority of the property is vacant, and the County has approved a Coastal Development Permit for 38 units, including demolishing the existing SFD. UCSB plans to redevelop the site within the next eight years. Development plan in final processing
5	Ocean Road Immediately east of 6506 El Nido Ln, Goleta, CA 93117	073-130-001	16.7	N/A	South Coast	Located on the west side of the UCSB campus. Ocean Road is a pending project that will accommodate 540 units for UCSB faculty and staff. UCSB will demolish or convert existing buildings for the new residential units.
6	Ocean Walk South of 4999 Cannon Green Dr, Goleta, CA 93117	073-090-075 073-670-031 073-630-038	25.5	N/A	South Coast	Ocean Walk is a pending project that proposes 70 units for UCSB faculty and staff. UCSB will demolish or convert existing buildings for new residential units.

Table 3-8. Draft Housing Element Update Pending Projects List (Continued)

Project Name / Location		APN	Acres	Zoning Designation	Planning Region	Comment[1]
7	Devereux 6900 Devereux Way, Goleta, CA 93117	073-090-029 073-380-066	9.3	N/A	South Coast	Nonvacant UCSB property. It includes over a dozen residential buildings, university buildings, and small park spaces. The project will demolish or convert existing buildings for 125 new residential units.
8	Brisa Encina Immediately east of 1426 Burton Mesa Blvd, Lompoc, CA 93436	097-111-007	3.56	SC to C-2 (rezone)	Lompoc Valley	Vacant, proposed rezone. 49 lower income units. Zoning clearance in final processing.
9	Legacy Estates West of 210 Shaw St, Los Alamos, CA 93440	101-201-001 101-202-001 101-231-001 101-232-001 101-233-001 101-234-001 101-242-001	12.02	7-R-1	Santa Ynez Valley	Subdivision map recording in progress and application submitted for proposed 59 above moderate units.
10	Key Site 3 PRD 119 Immediately east of 5560 Cantata Ln, Santa Maria, CA 93455	129-151-026	138.5	PRD-119	Santa Maria Valley	Vacant lot proposing 119 above moderate units. Application submitted and development plan approved.
11	Key Site 17 Immediately west of 420 Soares Ave, Orcutt, CA 93455	105-134-004 105-134-005 105-330-005 105-330-006	10.92	DR-20	Santa Maria Valley	Vacant lot proposing 88 moderate income units. Application submitted and development plan in final processing.
12	Foster Road Apartments (Key Site H) 1331 E Foster Rd, Santa Maria, CA 93455	107-240-040	4.12	DR-8	Santa Maria Valley	Nonvacant lot built with existing dwelling and school. Application submitted and development plan in final processing for 61 lower-income units.

Table 3-8. Draft Housing Element Update Pending Projects List (Continued)

Project Name / Location		APN	Acres	Zoning Designation	Planning Region	Comment[1]
13	Bell Street Mixed Use 300 Bell St, Los Alamos, CA 93440	101-181-001	0.46	CM-LA	Santa Ynez Valley	Vacant lot proposed for 4 above moderate-income units and 5,203. Pre-application submitted and approved.
14	Sagebrush Junction 742 Bell St, Los Alamos, CA 93440	101-260-006 101-260-007	0.76	CM-LA	Santa Ynez Valley	Vacant lot proposed for 8 above moderate-income units and 5,600 sf of commercial uses. Land use permit in final processing and time extension in review.
15	Harry's House Immediately north of 890 N Refugio Rd, Santa Ynez, CA 93460	141-380-045	2.2	PI	Santa Ynez Valley	Construction in progress for 60 lower-income units on a vacant lot.
16	Bohlinger Mixed Use 1090 Edison St, Santa Ynez, CA 93460	143-213-001	0.22	C-2	Santa Ynez Valley	Nonvacant lot built with existing stores and offices. A portion of the site proposed to be converted to 3 residential uses while the remainder will remain as commercial uses. Building permits in progress.
17	Halsell Immediately south of 1460 Deer Hollow Ln, Santa Maria, CA 93455	103-200-065	5.75	2-E-1	Santa Maria Valley	Vacant lot proposed for 5 above moderate income units. Application submitted and subdivision in process.
18	Vintage Ranch West of 1525 Oak Bluffs Dr, Santa Maria, CA 93455	101-570-005 101-570-006 101-570-009 101-570-010 101-570-011 101-570-012 101-570-013 101-570-014 101-570-015 101-570-016	33.07	PRD	Santa Maria Valley	Vacant lot proposed for 28 above-moderate income units. Application submitted and zoning clearance approved.

Table 3-8. Draft Housing Element Update Pending Projects List (Continued)

Project Name / Location		APN	Acres	Zoning Designation	Planning Region	Comment[1]
		101-570-017 101-570-018 101-570-019 101-570-023 101-570-028 101-570-029 101-570-030 101-570-031 101-570-032 101-570-033 101-570-034 101-570-035 101-570-036 101-570-037 101-570-038 101-570-039 101-570-040 101-570-041				

3.1.1 Introduction

This section describes potential impacts on aesthetics and visual resources that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). Visual resources addressed in this section include public scenic vistas and corridors, scenic highways, and light and glare, which all contribute to the visual quality and aesthetic character of Santa Barbara County.



Santa Barbara County's visual character is defined by its distinct urban communities in a coastal setting with rugged mountains and rural agricultural valleys. State Route (SR) 154 is one of three designated Scenic State Highways traversing the county.



Coastal communities in the South Coast are afforded high-quality views of the Santa Ynez Mountains and the Pacific Ocean. North County communities are surrounded by agricultural lands and mountainous areas.



Source: Top, DiscoverCentralCalifornia.com; Middle, TripAdvisor.com; Bottom, MoveItCubeIt.com

3.1.2 Environmental Setting

Santa Barbara County is visually diverse, comprising both the built and natural environment. Distinct urban communities are surrounded and separated by expansive rural lands. These open lands provide high visual quality with distinctive public views from roadways, trails, and public open spaces. The inland North County areas are characterized by rural open spaces of chaparral hillsides, oak woodlands, grassland meadows, and agricultural and pastoral landscapes containing farmlands, vineyards, and ranch-style development surrounding distinct urban communities. The South Coast contains an undisturbed natural environment on the periphery of urban areas in the foothills and along the coastline. The coastline contains dunes, sandy beaches, sea cliffs, and views of the surrounding mountains, Channel Islands, and Pacific Ocean. The county's coastal setting provides diverse views of the Pacific Ocean and Channel Islands from viewpoints in both urban communities and rural areas. Taken together, the county provides sweeping ocean

views, rural mountainous areas, expansive agricultural lands, and natural open space, all of which contribute to the county's visual resources.

3.1.2.1 Existing Visual Character by Region

The visual and aesthetic characteristics of each of the five housing market areas (HMAs) vary significantly. In general, greater concentrations of urban development surround the incorporated cities in the South Coast, while the more rural agricultural areas of the North County are characterized by lower-density suburban development. However, in recent years, there has also been an increase in residential and commercial development in North County, particularly in the community of Orcutt. Characteristics of each region are described in detail in the sections below.

Santa Maria Valley



The Santa Maria Valley supports a variety of community characteristics ranging from low-density suburban neighborhoods to historic mixed use downtowns such as Old Town Orcutt.
Source: iStockphoto.com

The Santa Maria Valley is largely rural and agricultural except for urban development in the cities of Santa Maria and Guadalupe, and along major transportation corridors in the unincorporated community of Orcutt. Unincorporated rural agricultural communities include Casmalia, Garey, and Sisquoc in the Santa Maria Valley. The visual character of the Santa Maria Valley is defined by expansive agricultural valleys and plains with low- to medium-density urban centers and distant views of the surrounding mountains and foothills available across open fields and grazing lands. Existing communities are suburban centered on traditional shopping centers and historic downtowns, such as Old Town Orcutt. The Santa Maria Valley also contains San Antonio Creek, Cuyama River, and Sisquoc River, which become the Santa Maria River and add to the scenic value of the region.

Prominent natural scenic resources in Orcutt include rolling hills at the southern edge of the Santa Maria Valley, the northern slopes of the Solomon and Casmalia Hills, and the drainage corridors and canyons of Orcutt, Pine Canyon, and Graciosa Creeks, which provide a natural vegetated open space corridor through the community. Undeveloped land east of U.S. Highway 101, which provides a distinct pastoral setting, oak woodlands, eucalyptus, pine windrows, and Waller Park- a regional park providing natural public open space and wooded areas are some of the prominent scenic resources that provide a significant visual backdrop to the urban areas within the region.

The primary travel corridors in the Santa Maria Valley are U.S. Highway 101, which is eligible for designation as a State Scenic Highway in this region, and State Route (SR) 1, which is classified as "moderately scenic" in the Orcutt Planning Area (County of Santa Barbara Planning and Development Department [P&D] 2022). Several properties along the major transportation corridors in the region (i.e., U.S. Highway 101, SR 135, and SR 1) serve as "gateway" properties to the community, giving Orcutt a semi-rural character. Additionally, local roads in Orcutt provide visual corridors. For example, Clark Avenue is a designated scenic corridor and visual resource in the Orcutt Community Plan area as it offers views of public viewsheds provided in the Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek.

Lompoc Valley

Unincorporated communities in the Lompoc Valley include Vandenberg Village, Mission Hills, and Mesa Oaks north of the City of Lompoc, which are suburban residential and do not have defined downtowns or large commercial areas. Scenic resources in the Lompoc Valley relate to the Santa Ynez River, which flows between the Purisma and Santa Rita Hills to create extensive natural areas within the watershed. Some of the primary scenic resources within the region that attract visitors include La Purisima Mission State Park, Burton Mesa Ecological Preserve, River Park, and Jalama Beach County Park and Campground. Agricultural lands of low to moderate scenic value border Lompoc to the east and west. These lands support mostly row crops and vineyards.



The Lompoc Valley includes the unincorporated communities of Vandenberg Village, Mission Hills (pictured), and Mesa Oaks, which comprise low-density suburban neighborhoods north of Lompoc and adjacent to wilderness areas in the Burton Mesa Ecological Preserve. Source: Google Earth

SR 1, a designated State Scenic Highway, traverses north-south through the Lompoc Valley. SR 1 in this portion winds through low-lying peaks and foothills of the Santa Ynez Mountains.

Santa Ynez Valley

Santa Ynez Valley has a substantial amount of land with high scenic value (County of Santa Barbara 2009d). The Santa Ynez Valley is defined by the San Rafael Mountains to the north and east, the Santa Ynez Mountains to the south, and the Purisima Hills to the west. The character of the valley is largely defined by ranchette, rural, agricultural, and open space uses. Much of this high scenic value land corresponds with the numerous creeks, rivers, and hills in the northern portion of the valley.



Santa Ynez Valley encompasses rural vineyards and ranchlands that surrounds distinct historic unincorporated communities of Santa Ynez, Ballard, Los Olivos, and Los Alamos. Source: TripAdvisor.com

The rural, scenic qualities unique to the Santa Ynez Valley are highly valued by the county's residents and visitors. Visually scenic features include the varying topography of peaks, valleys, ridgelines, the Santa Ynez River and its tributaries traversing east-west across the valley floor, oak woodlands, grassland meadows, rural agricultural landscapes, ranches, and vineyards. Nojoqui Falls County Park, Lake Cachuma, Zaca Lake Station, Sedgewick Natural Reserve, and the Santa Ines Mission are some of the prominent scenic resources that attract many visitors to this region. In addition to high-quality scenic views, the rural nature of the Santa Ynez Valley and the lack of light pollution allows for clear views of the nighttime sky and unique opportunities for astronomical observations. This quality is of value to residents within the Santa Ynez Valley and regionally in Santa Barbara County.

Travel routes provide the broadest range and greatest visual access to the various aesthetic resources within the Santa Ynez Valley, offering important viewing areas and scenic corridors. The designated State Scenic Highways (SR 154 and U.S. Highway 101) are two of the main routes through the Santa Ynez Valley. Other major scenic roadways passing through rural and agricultural areas include Highway 246, Happy Canyon Road, Foxen Canyon Road, Ballard Canyon Road, and Zaca Station Road. Panoramic views, ridgelines, oak forests, and chaparral vegetation are common elements that influence the aesthetic quality of these roads.

Cuyama Valley

The Cuyama Valley comprises arid agricultural land, rural residential structures, and hillsides and ridgeline of the Caliente Range and Sierra Madre Mountains surrounding the three distinctive unincorporated communities of Cuyama, New Cuyama, and Ventucopa. The varying topography, ridgelines, and canyons associated with the Sierra Madre Mountain Range provide visual interest to the flat valley floor. The County's Open Space Element describes that the Sierra Madre Mountains and foothills and Cuyama River have high scenic value (County of Santa Barbara 2009a).

SR 33 and SR 166 are eligible scenic highways. SR 166 from Cuyama to Twitchell Reservoir is designated as Scenic Level One, Segment Category 4, which is defined as the most scenic, having minor capacity, and a secondary destination route (County of Santa Barbara 2009a).



Cuyama Valley is set in the arid open valley in the eastern area of the county where the communities of Cuyama, New Cuyama, and Ventucopa are small unincorporated communities surrounded by ranches and wilderness.
Source: CuyamaBuckhorn.com

South Coast

The South Coast contains coastal communities bordered to the south by the Pacific Ocean and to the north by the foothills of the Santa Ynez Mountains. This setting creates dramatic views of the mid-and upper elevations of the mountains throughout the region. Coastal views are also afforded from public vistas, trails, beaches, and coastal access points throughout the region. Both urban and rural areas on the South Coast have distant views of the northernmost Channel Islands (i.e., Santa Cruz, Santa Rosa, and San Miguel) on clear days, especially from higher elevation ridges and hillsides, and scenic views of the Pacific Ocean. Scenic value is also derived from the dozens of creeks, tributaries, and watersheds that drain the foothills and southern faces of the Santa Ynez Mountains. In addition, the South Coast supports three State Parks, natural preserves, and beaches, which are some of the most prominent scenic resources that attract visitors to the region. These include but are not limited to Gaviota State Park, Arroyo Hondo Preserve, Refugio State Beach, El Capitan State Beach, Goleta Beach County Park, Arroyo Burro Beach County Park, Butterfly Beach, Lookout Park, Toro Canyon Park, Carpinteria Salt Marsh Nature Park, and Rincon Beach Park.

The officially designated State Scenic Highways are U.S. Highway 101 from the City of Goleta's western boundary to Route 1 at Las Cruces and SR 154. Highway 150 is eligible for a Scenic Highway Designation, which merges into U.S. Highway 101 at the easternmost boundary of the region.



The South Coast region includes urban areas from Goleta in the north to Carpinteria in the south, characterized by views of the Pacific Ocean and the Santa Ynez Mountains.
Source: Getty Images, George Rose

Eastern Goleta Valley contains a multitude of public scenic resources, such as: mountain viewpoints along the SR 154 corridor; island/ocean and coastal views along SR 154 from Painted Cave Road to the intersection with State Street; 360 views provided from locations such as More Mesa and San Antonio Creek Road to its intersection with SR 154; the community 'gateway' at State Street and SR 154; and local scenic routes, including North San Marcos Road from Cathedral Oaks Road to SR 154, SR 154 from Camino Cielo Road (ridgeline) to State Street, Turnpike Road from Hollister Avenue to Cathedral Oaks Road, and North Fairview Avenue to its terminus.

As with the other unincorporated areas on the South Coast, the Carpinteria Valley provides scenic coastal views from the foothills of the Santa Ynez Mountains. There are no designated scenic highways; however, SR 150 and U.S. Highway 101 are eligible for designation (California Department of Transportation [Caltrans] 2019).

3.1.2.2 Viewer Groups and Visual Sensitivity

Residents and Other Landowners

The rural and urban residents viewer group includes all permanent and seasonal residents within urban and rural areas of the county. Rural residents could be highly sensitive to changes in views because they generally experience views with relatively less dense development than urban areas, within the context of panoramic views of open lands. Differently, urban residents are also sensitive to changes to visual character and quality since visual resources are more limited to public vistas and corridors. However, urban residents may not be as sensitive to visual changes associated with new development within previously developed areas as rural residents. All residents are susceptible to light pollution affecting nighttime views and skyline alterations, such as degrading the visual quality of scenic vistas.

Motorists and Cyclists

Residents, commuters, recreationists, and freight haulers compose both local and regional traffic passing through the county. At standard roadway speeds, motorists' views of individual parcels along roadways are of moderate duration. Views for cyclists are of greater duration within visually scenic surroundings. Motorists on smaller, local roadways have slightly longer views of the surrounding landscape due to slower travel speeds. Motorists and cyclists can be sensitive to changes since the

passing landscape may be familiar to users of the local road network and users could be sensitive to physical changes to that landscape.

Visitors and Recreationists

Visitors primarily come to Santa Barbara County for purposes of tourism, wine-tasting, beach-going, bicycling, hiking, equestrian, cultural events, and other recreational activities. Visitors and recreationists using trails, visiting County or State Parks, or using other outdoor facilities are considered a sensitive group to visual impacts. This group would be susceptible to physical changes to the surrounding landscape, where a change in the quality of visual resources can diminish the experience for these users.

3.1.2.3 Existing Visual Resources

Santa Barbara County Scenic Values Mapping

Scenic values mapping within the County Comprehensive Plan Open Space Element identifies the visual quality of lands as seen from major roadways and edges of developed areas. Scenic areas are defined by features from the Conservation Element that can generally be regarded as having high levels of scenic quality and visual interest. Such areas include rivers, streams, watersheds, reservoirs, and select vegetative communities. Steep slopes and high elevation are also included for their potential to provide scenic vistas. The Open Space Element describes three general levels of scenic value:

- High: Warrant strong consideration for open space designation and preservation.
- Moderate: Advisability of prescribing special design standards, and subjecting plans to design review by the Planning Commission before development is permitted.
- Low: No standards are put forth for protection in the Open Space Element.

Approximately 10.5 percent of lands countywide are classified as having high scenic value, while nearly 58 percent have low scenic value (County of Santa Barbara 2009a).



The coastal setting of Santa Barbara County is characterized by scenic views of the Pacific Ocean and rural mountainous landscape interspersed with distinct urban and suburban environments within the cities and unincorporated communities.
Source: Gaviota Coast Conservancy.

A concept discussed in the County's Open Space Element, termed "urban perimeters," is relevant to the rural and coastal areas of the county. Urban perimeters are peripheral open space that gives a sense of place and scale within the Urban Area. Where the open edges can be seen from the built environment of the community, the psychological advantages are enhanced. Even where they cannot be seen from homes or workplaces, peripheral open spaces can give a sense of openness and offer visual resources close to home or work. The natural scenic beauty of the county affords communities a range of valuable benefits, including environmental protection, economic appeal, community character, and enhanced quality of life.

Scenic Vistas and Corridors

A public scenic vista or corridor is an area of land that has natural beauty and is visible from a public area, such as a roadway, trail, or park. The ocean, mountains, and open spaces provide high-quality visual resources as viewed from public vistas and scenic corridors. Often, these visual resources stem from other valuable watershed resources, such as hillsides and ridgelines, riparian corridors, environmentally sensitive habitat areas, and coastal resources. Collectively, these visible features help define the character of the community, a natural backdrop to the built environment within the County's Urban Area. Undeveloped rural lands, mountains, and coastal resources provide a significant visual backdrop for existing communities, particularly from public gathering spaces in the Urban Area.

The County's Scenic Highway Element in the Comprehensive Plan identifies and protects scenic highways and corridors in the county. According to the Scenic Highway Element, a scenic vista or corridor is an area of land that is visible from, adjacent to, and outside the highway right-of-way and is comprised primarily of scenic and natural features (County of Santa Barbara 2009b). Further, the County's Open Space Element designates scenic travel routes based on destination routes and traffic capacity, as well as scenic value; major roadways were evaluated and identified for their scenic values and are included in the Open Space Element. The County deems travel corridors of high scenic value to be worthy of prime consideration for scenic highway designation, while moderate travel corridors warrant careful development if development is permitted. An analysis of scenic values in travel corridors was included in the County's Open Space Element and Scenic Highways Element.



Scenic corridors, vistas, and gateways offer public views of the high-value visual resources in the county, including the Pacific Ocean, mountains, and rural agricultural valleys such as SR 154 (pictured) and U.S. Highway 101.
Source: Google Earth

The Environmental Resources Management Element (ERME) combines the results of these two analyses and identifies the following routes as having the highest scenic values within the county:



Community plans designate local visual resources, including public views and scenic roadways, such as Clark Avenue in Orcutt (pictured).
Source: Google Earth

North County

- U.S. Highway 101: Los Alamos-Buellton
- SR-1: Lompoc-U.S. 101
- SR-154: Los Olivos-U.S. 101
- SR-154: Lake Cachuma-Santa Barbara
- SR-166: Santa Maria-Cuyama
- SR-176: Santa Maria-Los Olivos
- Jalama Road: SR- l-Jalama County Park
- Jalama County Park-Gaviota Beach State Park
- Drum Canyon Road: Los Alamos-Lompoc-Buellton

South Coast

- U.S. Highway 101: Gaviota Beach-South Coast Urban Complex
- U.S. Highway 101: Montecito-Rincon Point
- U.S. Highway 101: Goleta North-Junction of Highway 1
- Toro Canyon Park-Serena Park

Scenic vistas and corridors are also addressed in the County's adopted community plans. For example, the Eastern Goleta Valley Community Plan designates local scenic routes along segments of key public roads and public vistas that afford views of the mountains, undeveloped skyline, coastal resources, open space, natural areas, watershed resources like creeks and wetlands, and rural agricultural and mountainous areas. Key priority public vistas and view corridors are mapped, including on Hollister Avenue near Turnpike Road, Ben Page Youth Recreation Center, Goleta Beach County Park, and the intersection of SR 154 with State Street; the plan also designates a gateway to Eastern Goleta Valley at the intersection of SR 154/U.S. Highway 101 and State Street as a local visual resource. An additional example lies in the Orcutt Community Plan, which designates local scenic corridors that afford views of the Solomon, Casmalia, and Orcutt Hills, including Clark Avenue through Old Town Orcutt. Further, the County's community plans include policies and programs to protect and enhance the character of the community, such as designating scenic resources and corridors, preserving viewsheds, coastal views, agricultural and rural character, and hillsides/ridgelines, and regulating building design, signage, and lighting (Section 3.1.1, *Regulatory Setting*).

Scenic Highways

Highway travel gives residents and visitors exposure to the county's visual attributes. At present, three state highways in the county have been officially designated as State Scenic Highways as part of the Caltrans' State Scenic Highway Program (Figure 3.1-1; Caltrans 2023):



Santa Barbara County Scenic Highways

FIGURE 3.1-1

Designated State Scenic Highways

- SR 1 (between the intersection of U.S. Highway 101 and Las Cruces and the City of Lompoc);
- SR 154 (entire length); and
- U.S. Highway 101 (from the City of Goleta's western boundary to SR 1 at Las Cruces).

Portions of other state highways traversing the county are identified in the state's master plan of highways eligible for a State Scenic Highway designation. These eligible highways may become official State Scenic Highways when the County implements a plan of preservation (Caltrans 2023; County of Santa Barbara 2009b)



Three state highways in the county have been officially designated as State Scenic Highways by Caltrans as part of the State's Scenic Highway Program, including SR 154 (pictured) and segments of SR 1 and U.S. Highway 101.
Source: Estately.com

Eligible State Scenic Highways

- SR 33 from the junction of SR 166 to the City of Ojai in Ventura County;
- SR 166 from Highway 33 west through Santa Barbara and San Luis Obispo counties to U.S. Highway 101;
- U.S. Highway 101 throughout its entire length in Santa Barbara County; and
- SR 150 from U.S. Highway 101 to the City of Ojai in Ventura County (County of Santa Barbara 2009b).

3.1.2.4 Light and Glare

New sources of lighting can be a nuisance to sensitive viewers through light spill or can create an ambient light glow that emanates upward and diminishes views of the clear night sky. If uncontrolled, light spill and ambient light glow can disturb wildlife in natural habitat areas and negatively affect nighttime views in urbanized areas. Glare can cause unwanted and potentially objectionable sensations as observed by a viewer as they look toward a surface that creates glare. Glare can be caused by a direct light source (direct glare) or, more commonly, by the reflection of the sun, moon, or artificial light source from a reflective surface (reflective glare).

The primary sources of light and glare differ between rural and urban areas. The primary sources of light in urban areas include interior building lighting, landscape lighting, security lighting, illuminated signs, streetlights, vehicles, and airplanes. Sources of glare in these areas include windows and reflective building materials, such as metal roofs as well as vehicles and airplanes.

In rural and semi-developed areas, there are fewer sources of light, including exterior and interior building lighting, illuminated signs, streetlights, airplanes, vehicles, and farm equipment. Sources of glare in these areas include windows and reflective building materials, such as metal roofs; however, natural sources and farmlands are often the primary sources of glare. A source of glare can be natural in the form of water surfaces, such as rivers and land cover. Glare from water is not usually perceived

as a negative aesthetic quality and can often be associated with high-quality and memorable visual experiences. Land cover can be exposed soil, seedlings, mature row crops, orchards, pasture, forest, and urban land cover, such as paved streets, sidewalks, and reflective roofing. These different cover types can produce different amounts of glare based on the amount of surface area and its roughness, reflectiveness, and coloring. For example, the plastic hoop greenhouses in the Santa Maria Valley area can produce glare due to the reflective material.

Lastly, light and glare can be affected by the absence of vegetation because vegetation acts to screen and filter light and soften the intensity of glare. For example, in areas of intense development that lack mature landscaping or where land has been denuded of natural vegetation for agriculture, there will be a notable increase in light and glare when compared to areas of development with mature landscaping or natural, vegetated areas.

3.1.3 Regulatory Setting

State and local regulations have been enacted to protect aesthetic and visual resources in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts. There are no federal regulations that pertain to this aesthetics and visual resources analysis.

3.1.3.1 State

California Scenic Highways Program

California's Scenic Highways Program was designed to preserve and protect scenic highway corridors. Jurisdictions nominating a Scenic Highway for official designation have in place or adopt ordinances to preserve the scenic quality of the corridor, including policies to preserve scenic resources through land use regulations, site planning, control of outdoor advertising (including a ban on billboards), grading, and measures to direct structural design and appearance (California Streets and Highways Code §260 et seq.). Suitability for designation as a State Scenic Highway is based on three criteria described in Caltrans' Guidelines for Official Designation of Scenic Highways (2008) (Caltrans 2022):

- **Vividness.** The extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements.
- **Intactness.** The integrity of visual order and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, grading).
- **Unity.** The extent to which development is sensitive to and visually harmonious with the natural landscape.

California Building Code

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress.

California Energy Code

The California Energy Code (Title 24, Part 6) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. Section 130.2 sets forth requirements for outdoor lighting controls and luminaire cutoff requirements. This requirement does not apply to streetlights for the public right-of-way, signs, or building façade lighting.

Section 140.7 establishes outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by the Lighting Zone, as defined in Section 10-114 of the California Energy Code. Additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Facade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

Section 130.3 stipulates sign lighting controls for any outdoor sign and Section 140.8 of the California Energy Code sets forth lighting power density restrictions for signs.

California Coastal Act

Coastal Act Policy 30251 identifies scenic and visual qualities of coastal areas as a resource of public importance. It states that permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

3.1.3.2 Local

County of Santa Barbara Comprehensive Plan

The County Comprehensive Plan's Land Use, Open Space, Environmental Resource Management, and Scenic Highways Elements contain descriptions, policies, and goals that both recognize scenic qualities and provide guidance for their protection. These plans and policies promote the protection of important visual resources and ensure that new development is compatible with the community and the surrounding environment.

Land Use Element

The Land Use Element of the Comprehensive Plan contains policies to protect and enhance visual resources. The land uses proposed within the Land Use Element, and depicted on land use maps, are to be used to guide the public and the decision-makers as to what uses are appropriate if and when development occurs. New development must generally be consistent with the Land Use Element's visual resource policies. The Hillside and Watershed Protection Policies address development on slopes to minimize grading, disruption of natural vegetation, and erosion. Visual resource policies include measures to ensure structures are subordinate to the surrounding natural environment and/or compatibility with the community through structural design review and landscaping requirements, limitations on signs that disrupt public views, and requirements for undergrounding of new utilities.

Visual Resource Policy 1: All commercial, industrial, and planned developments shall be required to submit a landscaping plan to the County for approval.

Visual Resource Policy 2: In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.

Visual Resource Policy 3: In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.

Visual Resource Policy 4: Signs shall be of size, location, and appearance so as not to detract from scenic areas or views from public roads and other viewing points.

Visual Resource Policy 5: Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.

Open Space Element

The Open Space Element identifies the county's scenic beauty as a principal factor in the attraction of visitors and residents and evaluates the visual quality of natural resources, travel corridors, and parameters of urban and rural areas within the county. The Open Space Element employs a scenic values model to map visual quality and uses factors of development intensity, siting, natural features, and vegetation as criteria for the protection of visual resources. Significant visual resources as noted in the Open Space Element include:

- Scenic highway corridors
- Parks and recreational areas
- Views of coastal bluffs, streams, lakes, estuaries, rivers, watersheds, mountains, and cultural resource sites
- Scenic areas

Environmental Resources Management Element (ERME)

The ERME presents the County's policies for air quality, biology, geology, surface and groundwater resources, noise, and visual resources protection based upon on the ERME factors maps. The ERME factor maps translate the summarized environmental factors information into a general expression of County policy on environmental resources management. Additionally, the factor maps categorize areas to direct future development. For instance, within "Category C" the ERME policies describe that urbanization could be permitted only in appropriate instances, subject to project plan review and imposition of specific conditions to protect against hazards and to preserve the integrity of the land and environment including areas of high scenic value and scenic corridors.

Scenic Highway Element

The Scenic Highway Element of the Comprehensive Plan presents the County's policies and procedures for scenic highways and their designation. This element specifically presents the County's scenic highway goals, evaluation standards, preservation measures, and procedures for obtaining official "Scenic Highway" designation for State-owned and County-owned roads in the county. The County's Scenic Highway Element contains preservation measures for eligible scenic routes (County of Santa Barbara 2009a). Such measures include the application of the Design Control Overlay District to require a design review of structures or other development, additional grading and landscaping regulations, and control of outdoor signage.

Community Plans

Santa Barbara County has 10 community or area plans. Each community plan contains goals, policies, and standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. Community plans with key residential design or development policies pertaining to new development related to the proposed Project are described below.

Eastern Goleta Valley Community Plan

Policy VIS-EGV-1.2. Public Vistas and Scenic Local Routes: Prominent views to and from the following Public Vistas and along and through Scenic Local Routes shall be preserved and enhanced:

- Santa Ynez Mountains and rural foothills
- Undeveloped skyline
- Coastal resources, including sloughs, beaches, wetlands, bluffs, mesas, the Santa Barbara Channel, and islands
- Open space, or other natural area
- Natural watershed resources, such as creek/riparian corridors, wetlands, vernal pools, habitat areas, etc.
- Rural agricultural and mountainous areas

Policy VIS-EGV-1.3. Gateway to the Community: The County shall enhance the gateway to Eastern Goleta Valley at the intersection of SR 154/U.S. Highway 101 and State Street as a local visual resource. Urban design and roadway improvements should indicate the transition to the Eastern Goleta Valley community through a combination of features including, but not limited to:

- Landscaping.
- Signage.
- Public art and monuments.
- Decorative pavement and streetscape installations.
- Building façade and interface design.
- Multimodal transportation amenities.

Policy VIS-EGV-1.4. Priority Public Vistas, Scenic Local Routes, and Gateway Map: The scenic value of visual resources, public vistas, and scenic local routes and view corridors shall be preserved and enhanced. The Priority Public Vistas, Scenic Local Routes, and Gateway Map shall be updated periodically to depict the extent and location of visual resources defined through Policy VIS-EGV-1.2 and Policy VIS-EGV-1.3.

Orcutt Community Plan

Policy VIS-O-2: Prominent public view corridors (U.S. Highway 101, SR 1 & 135, Clark Ave., Santa Maria Way, and Union Valley Parkway) and public viewsheds (Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek) should be protected.

DevStd VIS-O-2.1. Development shall be sited and designed to minimize disruption of important public view corridors and viewsheds through building orientation, minimization of grading on slopes, landscaping, and minimization of sound walls.

Policy VIS-O-5. The historic, small-town character of Old Town Orcutt should be preserved and enhanced.

Santa Ynez Community Plan

Policy VIS-SYV-2. All plans for new or altered buildings and structures within the Design Control Overlay shall be reviewed by the County Board of Architectural Review.

Hillside Housing Guideline 7.4. Minimize development on natural ridgelines and skylines by setting the building below these if feasible.

Hillside Housing Guideline 7.6. Use natural dark earth-toned materials and colors to reduce the apparent mass of the dwelling and help blend it with the environment.

Policy LUT-SYV-2.2. New residential development surrounded by walls and/or with gated access shall be discouraged.

Los Alamos Community Plan

Policy VIS-LA-1.3: New buildings and street improvements in the CM-LA zone district should reflect the "Rural Western Town" traditional qualities outlined in the Bell Street Design Guidelines.

Policy VIS-LA-1.4: New housing developments should be designed to be compatible with existing adjacent neighborhoods regarding character and design.

County of Santa Barbara Land Use and Development Code

The County's Land Use and Development Code (LUDC), Chapter 35, Zoning, of the Santa Barbara County Code, includes development standards protecting visual resources. Section 35.30.120 (Outdoor Lighting) of the LUDC provides restrictions on outdoor lighting to protect against spillover onto adjacent properties and to minimize interference with vehicular traffic on private/public streets from lighting. The LUDC contains height and size limits, including guidelines for development that regulate the design of future development, in some cases, through a review of project plans by the regional Board of Architectural Review (BAR). The North County BAR has review authority over the Santa Maria Project region, the Los Alamos Project region, and the Cuyama Project regions. The Central County BAR reviews projects in the Lompoc region, the Santa Ynez Project region, the western

half of the South Coast Project region, and the southwest quarter of the Cuyama Project region. The South County BAR reviews projects in the southeast quarter of the Cuyama Project region and the eastern half of the South Coast Project region, excluding the area that is subject to the Montecito Community Plan. The Montecito BAR reviews projects in the area that are subject to the Montecito Community Plan.

35.28.080 Design Control Overlay Zone

The Design Control Overlay zone is applied where, because of visual resources and/or unique neighborhood characteristics, plans for new or altered structures require a Design Review. The intent is to ensure well-designed development and to protect scenic qualities, property values, and neighborhood character. In the Plan area, the following shall be submitted for Design Review in compliance with Section 35.82.070 of the LUDC (Design Review – see below):

a) New one-family and two-family dwellings.

b) Demolished and reconstructed one-family and two-family dwellings when 50 percent or more of the existing gross floor area is demolished.

c) Second- and third-floor additions to existing one-family and two-family dwellings not including the addition of lofts within an existing structure where there is no change in the outward appearance of the structure.

d) Conversions of attached and detached garages that are accessory to one-family or two-family dwellings that result in an increase in habitable area.

35.28.150 Highway 101 Corridor Overlay Zone

The Highway 101 Corridor Overlay (HC) includes areas along U.S. Highway 101 in the South Coast urbanized area. Each project must be evaluated to determine the potential of the proposed development to impact the visual qualities of the area. To the maximum extent feasible, all development, including expansions of U.S. Highway 101, must incorporate provisions for landscaping to preserve the scenic and visual amenities that exist along the affected transportation corridor or to replace such landscaping with comparable scenic and visual amenities.

35.30.060 Design Compatibility Standards

Chapter 35.30 (Standards for All Development and Land Uses) of the LUDC expands upon the standards for zones and allowed land uses in the county by addressing the details of site planning and project design. Section 35.30.060 establishes design compatibility standards for development within the rural and urban areas, as well as within Existing Developed Rural Neighborhoods (EDRNs), as follows:

Rural. Within Rural areas as designated on the Comprehensive Plan maps, the height, scale, and design of each structure shall be compatible with the character of the surrounding natural environment, as determined by the review authority, except where the review authority determines that technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms, shall be designed to follow the natural contours of the landscape, and shall be sited so as not to intrude into the skyline as seen from public viewing places.

Urban and Existing Developed Rural Neighborhoods. Within Urban areas and EDRNs as designated on the Comprehensive Plan maps, new structures shall conform with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.

35.31.020 Multiple Unit and Mixed Use Housing Objective Zoning and Design Standards

In February 2023, the County adopted objective design standards for qualifying multiple unit and mixed use housing projects. The purpose of this chapter is to implement a streamlined application review process for "qualifying streamlined housing projects", consistent with the requirements of state law. Qualifying streamlined housing projects must comply with all objective land use regulations, development standards, and design review standards in effect at the time a complete application is submitted, including but not limited to objective design standards provided in Chapter 35.33 – Multiple Unit and Mixed Use Housing Objective Design Standards. Qualifying streamlined housing projects require a zoning clearance in conformance with Section 35.82.210 and do not require a conditional use permit or other discretionary review or approval. The objective design standards address building design (e.g., form, massing, windows, façade and roofline articulation, and colors), site design (e.g., building orientation, parking and access, pedestrian walkways, landscaping), mixed use standards (e.g., ground floor height and transparency), and utilitarian elements (e.g., bicycle parking, solid waste management, screening mechanical equipment).

County of Santa Barbara Local Coastal Program

The County Local Coastal Program (LCP) is required by the California Coastal Act to govern projects in the Coastal Zone. The County's LCP includes the Coastal Land Use Plan (CLUP) and Article II Coastal Zoning Ordinance (CZO), which implements the CLUP.

Coastal Land Use Plan

The purpose of the CLUP is to protect coastal resources and provide greater access and recreational opportunities for the public's enjoyment while allowing for orderly and well-planned urban development and the siting of coastal-dependent and coastal-related industries. The CLUP establishes land uses within the Coastal Zone. The other elements of the County's Comprehensive Plan are applicable within the Coastal Zone; however, where conflicts exist, the LCP takes precedence. The plan includes numerous policies applicable to development projects. Sections 3.4.3 and 3.4.4 of the County of Santa Barbara CLUP provide policies that protect coastal visual resources. These policies are intended to help implement the Coastal Act at the county level. Section 3.4.4 focuses on visual resource protection in the View Corridor Overlay, specifically vistas from scenic U.S. Highway 101.

Visual Resources Policy 4-2: All commercial, industrial, planned development, and greenhouse projects shall be required to submit a landscaping plan to the County for approval.

Visual Resources Policy 4-3: In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.

Visual Resources Policy 4-4: In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community.

Visual Resources Policy 4-9: Structures shall be sited and designed to preserve unobstructed broad views of the ocean from Highway 101 and shall be clustered to the maximum extent feasible.

Visual Resources Policy 4-10: A landscaping plan shall be submitted to the County for approval. Landscaping, when mature, shall not impede public views.

Visual Resources Policy 4-11: Building height shall not exceed one story or 15 feet above average finished grade, unless an increase in height would facilitate clustering of development and result in greater view protection, or a height more than 15 feet would not impact public views to the ocean.

Coastal Zoning Ordinance

The CZO applies to the unincorporated coastal zone. It implements the CLUP by classifying and regulating the uses of land, buildings, and structures in the coastal zone.

Sections 35-75.1, 35-75.11 – Planned Residential Development, promotes flexibility and innovative design of residential development to provide desirable aesthetic and efficient use of space and to preserve significant natural, scenic, and cultural resources of a site. In addition, siting of structures shall be based on the following factors: privacy, light and air, solar exposure, building configuration, and aesthetics.

Section 35-144 – Ridgeline and Hillside Development Guidelines state that the development standards are intended to ensure compatibility with surrounding land uses to protect visual resources.

Section 35-77.10 – Building Coverage for High-Density Student Residential states not to exceed 30 percent of the net area of the property shall be covered by buildings containing dwelling units. Structures shall be sited taking into consideration the following factors: scenic qualities of the site, protection of natural and/or coastal resources, preservation of existing healthy trees on the site, design aesthetics, privacy and light, and solar exposure.

Section 35-179.6 – Permit Procedures states the project is compatible with the neighborhood and does not create an adverse impact on community character, aesthetics, or public views.

Section 35-191.9 – Exterior Lighting states All outside illumination for aesthetic and/or decorative purposes for any structure and/or surrounding landscape, public or private, and for outdoor recreational facilities that are not fully shielded shall be prohibited between 9:00 p.m. and sunrise. All illumination of exterior areas between 9:00 p.m. and sunrise shall be shielded.

3.1.4 Environmental Impact Analysis

This section discusses the potential aesthetics and visual resource impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed, and the residual impact after mitigation is determined.

3.1.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

Appendix G of the California Environmental Quality Act (CEQA) Guidelines states that a project would be considered to have a significant impact related to aesthetic and visual resources if it would:

a. Have a substantial adverse effect on a scenic vista.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic highway.

c. In nonurbanized areas, substantially degrades the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area and would conflict with applicable zoning and other regulations governing scenic quality.

d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

County of Santa Barbara Environmental Thresholds and Guidelines

The County Visual Aesthetics Impact Guidelines that are set forth in the County's *Environmental Thresholds and Guidelines Manual* (2021) discuss the subjective nature of aesthetic and visual impacts and present questions that guide visual impact analyses, rather than provide defined significance thresholds. Affirmative answers to the following guiding questions would indicate potentially significant impacts on aesthetic and visual resources.

1a. Does the Project area have significant visual resources by virtue of surface waters, vegetation, elevation, slope, or other natural or man-made features which are publicly visible?

1b. If so, does the proposed Project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?

2a. Does the Project have the potential to impact visual resources of the Coastal Zone or other visually important areas (i.e., mountainous areas, public parks, urban fringe, or scenic travel corridors)?

2b. If so, does the Project have the potential to conflict with the policies set forth in the County's CLUP, the Comprehensive Plan, or any applicable community plan to protect the identified views?

3. Does the Project have the potential to create a significant adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not

known. As a result, the impact analysis provided below does not evaluate potential impacts on aesthetic and visual resources at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for lower- and moderate-income units.

The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This section is derived from the existing evaluations and mapping of visual resources by the Santa Barbara County Comprehensive Plan and associated community plans. Additionally, this section integrates relevant information from the Connected 2050: Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) EIR, the 2017 Cannabis Land Use Ordinance and Licensing Program EIR, the 2016 Gaviota Coast Plan EIR, the 2015 Eastern Goleta Valley Community Plan EIR, and the 2014 Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments EIR. The impact determinations are based on consistency with the CEQA thresholds, the County's Visual Aesthetic Impact Guidelines (Section 19 of the 2021 *Environmental Thresholds and Guidelines Manual*), and the County's existing policies and regulations related to aesthetics and visual resources.

3.1.4.2 Project Impacts

Table 3.1-1 provides a summary of the proposed Project's impacts related to aesthetics and visual resources. A detailed discussion of each impact follows.

Table 3.1-1. Summary of Aesthetics and Visual Resources Impacts

Aesthetics and Visual Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact AV-1. The proposed Project could result in adverse effects on public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways.	Potentially Significant	MM AV-1 (Objective Design ~~Development~~ Standards for Multiple Unit and Mixed Use Housing Projects)	Significant and Unavoidable Impacts
Impact AV-2. The proposed Project could degrade the existing visual character or quality of public views of a site and its surroundings in the Rural Area or potentially conflict with applicable zoning and other regulations governing scenic quality in the Urban Area, including policies and development standards of the County's Comprehensive Plan, Coastal Land Use Plan, and Community Plans.	Potentially Significant	MM AV-1 (Objective Design ~~Development~~ Standards for Multiple Unit and Mixed Use Housing Projects)	Significant and Unavoidable Impacts
Impact AV-3. Potential future development facilitated by the proposed Project would not result in a new source of substantial light or glare that may adversely affect day or nighttime views in the area.	Insignificant	No mitigation required	Insignificant Impacts
Cumulative Impacts	Potentially Significant	MM AV-1 (Objective Design ~~Development~~ Standards for Multiple Unit and Mixed Use Housing Projects)	Significant and Unavoidable Impacts

Impact AV-1. The proposed Project could result in adverse effects on public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways.

Infill residential and mixed use development associated with the Housing Element Update would not have a substantial adverse effect on public scenic vistas or visual resources, including those visible along State Scenic Highways, or within visibly important areas such as the Coastal Zone or mountainous areas. Based on the sites inventory prepared for the Housing Element Update, potential future higher-density residential and mixed use development (i.e., 25 to 40 dwelling units per acre [du/ac]) enabled under the Housing Element Update would primarily occur in the Urban Area and would not be substantially visible from public scenic vistas or State Scenic Highways. Many of these

sites do not support features which are considered highly scenic (e.g., surface waters, vegetation, elevation, slope, or other natural or man-made features) or which would constitute the site as a scenic resource given that many of the sites within the Urban Area include existing highly disturbed or developed sites within the lower-lying, inland areas. Higher-density development could rise four or more stories in height, but because infill development would be part of the existing urbanized areas and would not occur on hillsides or ridgelines, substantial changes to quality of or public enjoyment of public scenic vistas as well as visual resources, including those along State Scenic Highways would not occur. Development in the Rural Area would not be substantially visible from public scenic vistas or viewing areas and State Scenic Highways based on the sites inventory prepared for the Housing Element Update. Additionally, residential and mixed use development enabled under the Housing Element Update would be subject to existing development and design standards – including landscaping, setbacks, screening, and design review for new development in urban environments – to ensure visual compatibility with surrounding development. For example, the development of Rezone Site No. 18 (Friendship Manor) in Isla Vista would involve multi-story development up to 40 du/ac to replace an existing surface parking lot along El Colegio Road. While the development would visually change the site, the change would not be visible from any public scenic vistas, viewing locations, or State Scenic Highways and would be visually compatible with the built urban environment in Isla Vista.

Existing vacant sites would be developed with new housing consistent with existing zoning code requirements for density and height allowances, which protect new development impacts on scenic vistas and State Scenic Highways. Potential future residential and mixed use development on vacant sites would be subject to the County's design review and permitting process under existing zoning code requirements, which would ensure residential development is sited and designed to protect and enhance visual resources along State Scenic Highways and public scenic vistas.

However, it is foreseeable that future housing and mixed use buildings enabled under the Housing Element Update could be developed on large properties that are currently undeveloped, contain visual resources including trees/vegetation and/or rock or geologic formations, lie in the Rural Area, are located on or interfere with views of hillsides, and/or support existing agriculture against a high-value visual setting and/or would be visible from public vistas or State Scenic Highways. In these cases, housing and mixed use development, particularly higher density projects of 20 to 40 du/ac, would substantially change public scenic vistas and visual resources along State Scenic Highways. For example, on the South Coast, Rezone Sites No. 12 (St. Vincent's East) and No. 13 (St. Vincent's West) are located at the base of the San Marcos Foothills, an area that is highly visible from SR 154, a designated State Scenic Highway as well as public scenic vistas including the Eastern Goleta Valley Gateway at SR 154 and State Street and the San Marcos Foothills Preserve and Park. Projects on these sites could involve the development of up to four stories or more on either side of SR 154. In the North County, Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in Orcutt would involve mixed use development up to 40 du/ac along Clark Avenue. Clark Avenue is a locally designated public view corridor and visual resource in Orcutt as it offers views of public viewsheds in the Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek. Development of properties with higher-density housing projects on sites that are visible from public scenic vistas and/or State Scenic Highways would substantially change and/or obstruct existing public views and degrade the visual resource value of those views.

Housing projects on existing vacant sites under existing zoning code requirements would be subject to development standards and design requirements of the County's zoning ordinance and community plans. These development standards would continue to protect and enhance the scenic qualities of

public scenic vistas and State Scenic Highways, such as requiring landscaping, setbacks, screening, and design review by BAR for new development. However, Program 1 of the Housing Element Update, directs the County to revise its development standards within the County's zoning ordinances to ensure that maximum densities on rezoned sites can be achieved. This may include development standard changes to reduce setbacks, increase height limits, increase lot coverage, and/or reduce or eliminate other development standards that inhibit the ability of rezoned sites to achieve their maximum densities. Additionally, the proposed Project, in compliance with state law, would allow use-by-right for housing projects with 20 percent of the units affordable to lower-income households and zoned at a residential density allowing at least 20 du/ac (Program 2 of the Housing Element Update). As a result, higher-density housing and mixed use development projects on sites that are visible from public scenic vistas and State Scenic Highways would result in *potentially significant impacts* to visual resources.

Implementation of **MM AV-1 (Objective Design ~~Development~~ Standards for Multiple-Unit and Mixed Use Housing Projects)** would help to ensure the protection of existing views from public scenic vistas and State Scenic Highways resulting from use-by-right housing projects; however, implementation of this mitigation would not fully reduce the impact to an insignificant level. The only way to fully avoid the visual impacts resulting from the implementation of the Housing Element Update would be to eliminate sites within public scenic vistas or State Scenic Highways, thereby eliminating potential housing sites from future development. However, doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets. Therefore, impacts would remain *significant and unavoidable.*

Impact AV-2. The proposed Project could degrade the existing visual character or quality of public views of a site and its surroundings in the Rural Area or potentially conflict with applicable zoning and other regulations governing scenic quality in the Urban Area, including policies and development standards of the County's Comprehensive Plan, Coastal Land Use Plan, and Community Plans.

Similar to Impact AV-1, the proposed Project would enable new future residential and mixed use development that could affect the existing visual character of public views from sites and their surroundings. This visual impact is largely associated with higher density residential and mixed use development of 20 to 40 du/ac and up to four stories or more. This is particularly when these projects occur on large, undeveloped properties that: contain visual resources, including natural habitat areas, vegetation, or waterways; lie in the Rural Area; are located on or interfere with views of hillsides; and/or support existing agriculture against a high-value visual setting.

In the Rural Area, housing development would primarily consist of the ongoing development of existing vacant sites under existing zoning code requirements. These residential and mixed use development projects would be subject to existing County zoning regulations including but not limited to height limits, design requirements, and design review to maintain visual compatibility with the rural setting. However, Program 1 of Housing Element Update includes a potential rezone program to support higher-density residential and mixed use development. The proposed Project would reduce development standards, such as setbacks, height limits, and maximum site coverage to ensure maximum densities can be achieved to meet the County's RHNA plus a 15 percent buffer. Additionally, the proposed Project would allow use-by-right for housing projects with 20 percent of the units affordable to lower-income households and zoned at a residential density allowing at least 20 du/ac (Program 2 of the Housing Element Update).The proposed Project's potential rezones program includes some sites that may adversely affect the existing visual character or quality of public

views in the Rural Area. For example, Rezone Site No. 11 (Glen Annie) is located in the Rural Area and would transform a golf course surrounded by natural areas and agricultural uses into a residential neighborhood with up to 40 du/ac and four stories or more, which would be highly visible from public vistas in the foothills and local public roads, such as Glen Annie and Foothill Road. This development would dramatically change the visual character of the site and the surrounding area, which is set at the base of the Santa Ynez Mountains, comprising foothill orchards and undeveloped hillsides and ridgelines. Adverse visual effects would be similar for housing sites that either lie in the County's designated Rural Area or on the urban fringe where housing development would indirectly affect the visual characteristics of rural visual resources in the vicinity. For example, Rezone Site No. 23 (Key Site 16) in Orcutt would involve the conversion of open land to mixed use development of up to 40 du/ac and four or more stories or more on Clark Avenue on the western edge of Old Town Orcutt. This potential development would dramatically change the character of the site and obstruct clear views of the Casmalia Hills from Clark Avenue, a designated local scenic corridor (refer also to Impact AV-1). Rezone Site No. 23 (Key Site 16) is on the fringe of the Urban Area and would substantially change the existing open land and rural character of western Orcutt if rezoned and developed as an implementation of the proposed Project.

In the Urban Area, housing development would primarily consist of infill development on underutilized sites. Many of these projects would be subject to the County's existing zoning code requirements to help address visual inconsistencies between new development and the existing character of scenic resources, including parameters for structural height, setbacks, building coverage, and design review. Some existing County policies would help reduce the visual impact of new development; for example, County Land Use Element Visual Resources Policy 5 requires utilities to be placed underground in new developments to avoid impacts to visual character. Further, Section 35.30.060 (Design Compatibility Standards) of the LUDC would require that new development conform with the scale and character of the existing community while also encouraging clustered development varied circulation patterns, and diverse housing types. However, Program 1 of the Housing Element Update directs the County to revise its development standards within the County's zoning ordinances to ensure that maximum densities on rezoned sites can be achieved. This may include development standard changes to reduce setbacks, increase height limits, increase lot coverage, and/or reduce or eliminate other development standards that inhibit the ability of rezoned sites to achieve their maximum densities. Further, County-owned sites are not subject to the County's zoning code provisions; therefore, development standards and regulations may not be applied to those potential future housing projects. It is foreseeable that higher-density residential and mixed use projects (i.e., 20 to 40 du/ac) with building heights up to four stories or more could be inconsistent with the County's community plans, including development standards, and the County's zoning code. For example, in Eastern Goleta Valley, Rezone Sites No. 12 (St. Vincent's East) and No. 13 (St. Vincent's West) are located on either side of a designated scenic corridor (SR 154) and at the designated community gateway, where policies and development standards of the Eastern Goleta Valley Community Plan aim to ensure the scenic value of visual resources, public vistas, and scenic local routes and view corridors will be preserved and enhanced. Development of these sites would dramatically change community character or public views and would conflict with Eastern Goleta Valley Community Plan policies (e.g., Policies VIS-EGV-1.3, VIS-EGV-1.4) and County development standards (e.g., LUDC Sections 35.28.080 and 35.30.060) that intend to protect the existing visual character of the area.

A detailed analysis of the Project's consistency with applicable plans and policies addressing land use development and protection of aesthetic and visual resources as they related to adoption and

implementation of the Housing Element Update is provided in Section 3.10, *Land Use and Planning.* However, conclusions regarding the potential effects of the proposed Project on the visual character and quality of public views in the Rural Area, as well as consistency with the County's zoning code and other applicable regulations (e.g., CLUP, and CZO) in the Urban Area that would result from future development of individual sites would be speculative without specific project details (e.g., building height, lot coverage, setbacks) associated with future residential and mixed use development enabled by the proposed Project. Regardless, it is foreseeable that the proposed Project could facilitate housing development in the Rural Area that could substantially change the visual character of the site and surrounding area as well as effect public views (e.g., Rezone Site No. 23 [Key Site 16]). Additionally, it is foreseeable that the proposed Project could be inconsistent with applicable County zoning codes and regulations, including community plan policies and development standards. With the implementation of the proposed Project, including the potential future revisions of County development standards related to lot coverage, height limits, and setbacks to ensure that the maximum densities of selected rezone sites could be achieved, projects, this impact would be *potentially significant.*

Implementation of **MM AV-1 (Objective Design ~~Development~~ Standards for Multiple-Unit and Mixed Use Housing Projects)** would help ensure residential and mixed use development would be consistent with the existing character of the Rural Area and would be consistent with visual resource policies, zoning code standards, and applicable regulations in the Urban Area; however, implementation of this mitigation would not fully reduce impacts to an insignificant level. The only way to fully avoid the visual impacts resulting from the implementation of the Housing Element Update would be to eliminate sites where the development of higher-density housing and mixed use structures of up to four stories or more could be inconsistent with community character or applicable regulations or County policies, thereby eliminating potential housing sites from future development. However, doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets. Therefore, impacts would remain *significant and unavoidable.*

Impact AV-3. The proposed Project would not result in a new source of substantial light or glare that may adversely affect day or nighttime views.

In the Urban Area, existing sources of light and glare are high. Potential future development in these areas would be constructed consistent with existing zoning and surrounding settings and therefore would not result in a new source of substantial light or glare that would adversely affect day or nighttime views of the area.

Future development could increase nighttime light and glare in the Rural Area because of additional housing, including at potential rezone sites where existing agricultural-zoned properties could be rezoned to residential use. The rezoning of land to accommodate housing would introduce new sources of light into areas where less light occurs, such as in more rural agricultural areas of North County and agricultural rezone properties on the South Coast (e.g., within the South Patterson Agricultural Area and San Marcos Agricultural Area). For example, Rezone Site No. 36 (Blue Sky Property) at the intersection of SR 166 and Newsome Street in New Cuyama is currently undeveloped and zoned for agriculture. Because of the proposed Project, this parcel may be rezoned to a higher-density residential use. Intensified development at this site compared to existing conditions would create a potential for light pollution and glare to surrounding properties. Similarly, in the Lompoc Valley HMA, Rezone Site No. 32 (Fong 1) and No. 33 (Fong 2) are situated directly adjacent to one another in an otherwise dark area adjacent to the Burton Mesa Reserve. Higher-density development

at these sites could contribute to light spillover issues and has the potential to degrade or significantly interfere with the public's enjoyment of the night sky.

In addition, future development of sites located within the Airport Influence Area (AIA) of local airports (e.g., Santa Barbara Airport, Santa Maria Airport) have the potential to generate light or glare that could conflict with or interfere with airport operations.

All new development is required to comply with the lighting standards of County Code Chapter 35.30.120, *Outdoor Lighting*, which requires that lighting fixtures be installed, controlled, or directed so that the light will not glare or be blinding to pedestrians or vehicular traffic or on adjoining property. For example, the zoning ordinance specifies that exterior lighting shall be hooded, and no unobstructed beam of exterior light shall be directed toward any area zoned or developed as residential. Additionally, light trespass and glare shall be reduced to the maximum extent feasible through downward directional lighting methods and shielding and shall be designed so as not to direct light or glare upward into the sky or interfere with vehicular traffic on any portion of a street. Further, future development of sites within the AIA of the Santa Barbara Airport and Santa Maria Airport is subject to compliance with existing rules and regulations of the applicable Airport Land Use Compatibility Plan (ALUCP), as well as other existing regulations governing development of land near existing airport (e.g., Code of Federal Regulations, Part 77), which require the avoidance of site characteristics such as sources of glare, bright lights, and districting lights that could be mistaken for airport lights. Through compliance with the County Code, regulations address development within the AIA, and site-planning/design standards for light and glare, potential spillover would be minimized, and the impact considered *insignificant.*

3.1.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding incorporated cities. Project impacts along with potential impacts from pending and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects, such as the Accessory Dwelling Unit (ADU) Ordinance Amendments (Cumulative Project No. 13) to incorporated cities in Santa Barbara County's 2023-2031 Housing Element Update (Cumulative Project No. 1 – 8) (Table 3-6).

Certain proposed uses and related development could result in site disturbance, grading, or site improvements, as well as the introduction of temporary visiting populations, which could result in slight changes to topographical features, obstruction of potential scenic resources, and additional sources of light and glare. These activities, as well as the construction and operation of other cumulative development projects in the county, could result in adverse effects on scenic vistas and scenic resources, as well as changes to the existing visual character due to additional development or introduction of substantial sources of new light or glare.

Cumulative projects as described in the Section 3.0.6, *Cumulative Impact Analyses* (Tables 3-6, 3-7, and 3-8; Appendix I), including pending projects in the unincorporated county, have the potential to adversely affect scenic resources and visual character. In many cases, aesthetics and visual resources would be addressed on a case-by-case basis to mitigate impacts resulting from individual projects. Many development projects would be subject to discretionary review and would be required to maintain compliance with design and development standards and applicable community plans.

However, as discussed in Impacts AV-1 and AV-2 future development facilitated by the proposed Project may not be able to fully mitigate visual impacts even with **MM AV-1 (Objective Design ~~Development~~ Standards for Multiple-Unit and Mixed Use Housing Projects)**. Combined with other developments in the region, the visual change and the potential inconsistency of that collective change with County visual resource policies and regulations could be cumulatively substantial. Therefore, the Project would contribute to cumulative impacts on aesthetics and visual resources and impacts would be *significant and unavoidable.*

3.1.4.4 Proposed Mitigation

MM AV-1: Objective Design ~~Development~~ Standards for Multiple Unit and Mixed Use Housing Projects. The County's objective design standards for multiple unit and mixed use housing projects shall apply to all ~~shall revise its zoning ordinances to apply its objective development standards in Section 35.31.020 of the LUDC to~~ multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law.

Requirements and Timing: This measure shall apply to applicable projects immediately following certification of this EIR. The County shall amend its zoning ordinances to apply existing objective development standards to multifamily housing projects that are proposed on County-owned sites and/or that are subject to solely ministerial review and approval and/or objective standards according to state housing law~~all higher-density housing projects identified in the County's Housing Element Update, in addition to the qualifying streamlined housing projects compliant with state law~~. Any required amendments ~~Amendments~~ to the zoning ordinances shall be implemented before the issuance of grading or building permits for any new development proposing residential densities of 20 dwelling units per acre or more on sites identified in the Housing Element Update.

Monitoring: All objective design standards shall be included in the qualifying housing project's plans. County P&D compliance monitoring staff shall ensure compliance through a review of project plans.

3.1.4.5 Secondary Impacts

Implementation of **MM AV-1 (Objective Design ~~Development~~ Standards for Multiple-Unit and Mixed Use Housing Projects)** would potentially create significant secondary impacts associated with the loss of open space. With objective design standards that would limit building heights and control site design to protect visual resources, future housing projects enabled under the Housing Element Update could reduce the area dedicated to avoiding the loss of biological resources and providing open space for parks and recreation. Expanding development into a larger footprint could potentially encourage or force open space mitigations into smaller or shared spaces, which could reduce their effectiveness or feasibility. Please see Section 3.4, *Biological Resources* and Section 3.11, *Public Services and Recreation* for impact analysis and mitigation measures for these resources.

3.1.4.6 Residual Impacts

Impact AV-1. Implementation of **MM AV-1 (Objective Design ~~Development~~ Standards for Multiple-Unit and Mixed Use Housing Projects)** would help to ensure the protection of existing views from public vistas or visual resources, including those visible from State Scenic Highways, or

within other visibly important areas; however, implementation of this mitigation would not fully reduce the impact to an insignificant level. The only way to fully avoid the visual impacts resulting from the implementation of the Housing Element Update would be to eliminate sites within public view corridors or State Scenic Highways, thereby eliminating potential housing sites from future development. However, doing so would substantially reduce the flexibility for County decision-makers to meet the RHNA plus 15 percent buffer and affordability targets. Therefore, residual impacts would be *significant and unavoidable.*

Impact AV-2. Implementation of **MM AV-1 (Objective Design ~~Development~~ Standards for Multiple-Unit and Mixed Use Housing Projects)** would help to ensure new housing projects would be consistent with the existing character of the Rural Area and would be consistent with visual resource policies, development standards, zoning code standards, and applicable regulation in the Urban Area; however, implementation of this mitigation would not fully reduce impacts to an insignificant level. The only way to fully avoid the visual impacts resulting from the implementation of the Housing Element Update would be to eliminate sites where the development of higher-density housing and mixed use structures of up to four stories or more would be inconsistent with community character or applicable regulations, thereby eliminating potential housing sites from future development. However, doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets. Therefore, residual impacts would be *significant and unavoidable.*

Impact AV-3. All new development is required to comply with the lighting standards of the County Code Chapter 35.30.120, *Outdoor Lighting*, which requires that lighting fixtures be installed, controlled, or directed so that the light will not glare or be blinding to pedestrians or vehicular traffic or on adjoining property. Therefore, residual impacts would be *insignificant*.

Section 3.2
Agricultural Resources

3.2.1 Introduction

This section describes potential impacts on agricultural resources that could occur from future residential and mixed use development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). The analysis considers direct, indirect, and cumulative impacts on agricultural resources, including the potential for direct conversion of agricultural lands (e.g., within or immediately adjacent to urban areas), potential for conflicts with agricultural operations, and loss of agricultural viability. The analysis also assesses consistency with agricultural zoning, agricultural policies, and Williamson Act contracts, which are guided by the County's *Uniform Rules for Agricultural Preserves and Farmland Security Zones* (County of Santa Barbara 2021).

3.2.2 Environmental Setting

Agricultural resources include any farmland with the potential for agricultural productivity based on soil and other physical characteristics. The California Environmental Quality Act (CEQA) defines "agricultural land" as inclusive of prime farmland, farmland of statewide importance, or unique farmland, as defined by the U.S. Department of Agriculture (USDA) and as modified for California (Public Resources Code [PRC] Section 21060.1). Prime Farmland is ideal for agriculture and is characterized by having the best combination of physical and chemical features and can sustain long-term agricultural production. Prime Farmland has the soil quality, growing season, and moisture supply needed to produce sustained high yields. As described further in Section 3.2.2.1, *Farmland Mapping and Monitoring Program Categorization*, Other Important Farmland – including Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance – is similar to Prime Farmland but includes minor shortcomings (e.g., steeper slopes, lesser quality soils) (Department of Conservation, Division of Land Resource Protection 2023b; Section 3.2.3, *Regulatory Setting*). Unique Farmland can also be used for the production of specific high-value food and fiber crops, with a special combination of soil quality, growing season, moisture supply, temperature, humidity, drainage, and elevation to economically produce sustainable high-yield crops. Unique Farmland is common in areas where this is a special microclimate, such as wine country in California (USDA 2023a). Agricultural resources also include land zoned for agriculture, land with existing agricultural uses, and land with agricultural potential that may not be zoned for agriculture. Agricultural land may be defined and protected by the County's Agricultural Preserve Program or by Williamson Act contracts to prevent conversion to non-agricultural use. The Agricultural Preserve Program enrolls land in Agricultural Preserve or Farmland Security Zone contracts where the land is restricted to agricultural, open space, or recreational uses in exchange for reduced property tax assessments. The Agricultural Preserve Contract List sorts the number of parcels that are within a Williamson Act Contract managed by the Agricultural Preserve Advisory Committee (APAC) (County of Santa Barbara 2022c). A Williamson Act contract is an agreement between private landowners and the government to restrict specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments (County of Santa Barbara 2023b).

3.2.2.1 Agricultural Productivity in Santa Barbara County

The county has a mild Mediterranean climate with average rainfall between 8 and 36 inches (depending on the region) and over 300 days of sunshine per year. The county also has a wide variety of soils that facilitate ideal growing conditions and long growing seasons for a diversity of crops and other agricultural products. The county's inland topography of mountain ranges and inter-mountain valleys allows for cool ocean air to flow inland, creating moderate temperatures conducive to high-value crops, such as premium wine grapes and subtropical fruits.



Agricultural production is a major contributor to the local economy According to the 2021 Agricultural Production Report, the value of agricultural production in the county was estimated at $1.9 billion (County of Santa Barbara 2021).
Source: Santa Barbara Independent and Rodeo Farms

The agriculture, tourism, and wine industries are the most significant contributors to the county's economy, with the agriculture industry contributing approximately $2.8 billion and supporting directly or indirectly approximately 25,370 jobs (County of Santa Barbara 2022a). Agricultural commodities produced a gross production value of $1.8 billion in 2021, with the highest-producing crops consisting of strawberries ($800 million), nursery products ($119 million), wine grapes ($105 million), broccoli ($101 million), cauliflower ($80 million), leaf lettuce ($76 million), and head lettuce ($74 million) (Table 3.2-1; County of Santa Barbara Agriculture Commissioner's Office 2021). Through a multiplier effect, county agriculture has an estimated local economic impact in excess of $2.8 billion (Agricultural Impact Associates 2016). Through the multiplier effect – including the economic activity associated with inter-industry "business to business" supplier purchases as well as "consumption spending" by employees – the agricultural industry has a much greater local economic impact. A robust study prepared by Agricultural Impact Associates in 2016 demonstrated an additional $1.0 billion contribution to the local economy as a result of the multiplier effect.

The county's agricultural production occurs on approximately 704,310 acres of agricultural lands, including 67,805 acres of Prime Farmland, 13,647 acres of Farmland of Statewide Importance, 37,699 acres of unique farmland, and 8,346 acres of Farmland of Local Importance under the Farming Mapping and Monitoring Program (FMMP), as further described in Section 3.2.2.2, *Farmland Mapping and Monitoring Program Categorization* (Department of Conservation, Division of Land Resource Protection 2023a; Tables 3.2-2 and 3.2-3). Approximately 505,517 acres of agricultural lands within the county are enrolled in Williamson Act contracts (County of Santa Barbara 2022b). A substantial amount of agricultural lands are also non-irrigated grazing and pasture lands where the prevalence of steep slopes, and less fertile, dryer lands may limit their agricultural use (Department of Conservation, Division of Land Resource Protection 2023a).



While rural agriculture, such as grazing land makes up the majority of the agricultural acreage within the county, the highest production value is associated with nursery products and cut flowers, which are agricultural uses anchored in urban agricultural greenhouses on the South Coast.
Source: Por La Mar Nursery

While grazing land makes up the bulk of the agricultural acreage in the county, irrigated crops produce the greatest total value. For example, fruit and nut production generated over $1.02 billion, which represents over half of the county's overall production value, and vegetables generated nearly $590 million in 2021. Further, per acre harvested, the highest-value crops in the county are nursery products and cut flowers/foliage, which generated $4.43 million and $1.45 million respectively. Nursery products and cut flower/foliage are produced on only 8 percent of the county's harvested acreage (approximately 935 acres) and a majority of this industry is supported by urban agricultural lands and greenhouses in the Eastern Goleta Valley and Carpinteria on the South Coast (Table 3.2-1). The county's agricultural industry continues to grow and change over time with trends of converting grazing lands to more intensive farming uses with higher-value irrigated crops and increasing pressure to convert urban agricultural lands to urban development, particularly on the South Coast where housing needs and job availability are highest. (Chapter 2, *Project Description.*) Grazing land is not recorded in the table below because it does not meet the county's definition of "harvested acreage." However, grazing land covers approximately 580,000 acres in Santa Barbara County as of 2016 (California Department of Conservation 2016).

Table 3.2-1. Summary of Agricultural Production in Santa Barbara County (2021)

Agricultural Production/Crop	Harvested Acreage[1]	Production Value[2]	Percentage of Total Production Value	Production Value Per Acre Harvested
Fruit and Nuts	21,718	$1,023,493,000	53.4	$47,126
Vegetables	59,743	$587,610,000	30.5	$17,132
Wine Grapes	15,210	$105,151,000	5.5	$67,291
Nursery Products	231	$119,137,000	6.2	$4,430,706
Cut Flower & Cut Foliage	704	$35,494,000	1.9	$1,453,825
Livestock and Poultry[4]	N/A	$36,003,000	1.9	N/A
Field & Seed Crops	572,572	$10,630,000	0.6	$1,788
Apiary Products[3]	N/A	$665,000	0.03 (0.0)	N/A
TOTAL	**712,823**	**$1,918,183, 000**	**100.0**	**$1,436**

Notes:
[1] Harvested acreage is not reflective of land area, but of acres harvested where in some cases, crops may be harvested more than once per year. Vineyards and orchards that are not yet producing are not included in the harvested acreage.
[2] Represented as gross values.
[3] Dairy and Apiary Products were separated starting in 2018.
[4] Livestock and poultry does not have a recorded harvested acreage because it does not fit the definition of "harvested acreage" in the 2021 Agricultural Production Report.
Source: County of Santa Barbara 2021

Table 3.2-2. Summary of Agricultural Lands within the Unincorporated Areas of the County

County Region	Total Agricultural land under FMMP[1] (acres)	Total land zoned for Agriculture[2] (acres)	Williamson Act Contracts (acres)
Santa Maria	134,641	147,491	97,308
Lompoc	201,997	275,501	118,669
Santa Ynez	164,317	247,456	133,755
Cuyama	175,243	361,771	129,925
South Coast	28,132	53,399	25,860
TOTAL	**704,310**	**1,085,618**	**505,517**

Notes:
[1] Acreage of total agricultural lands represents lands surveyed by the FMMP and includes prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and grazing farmland.
[2] Total land zoned for agriculture differs from agricultural land that is zoned AG-I or AG-II, which may include built-up land, roads, water, or other non-cultivation uses.
Source: Department of Conservation, Division of Land Resource Protection 2023a; County of Santa Barbara Assessor's Office 2023

3.2.2.2 Agricultural Productivity within Santa Barbara County Regions

Santa Maria Valley

Over half of the county's agricultural production value is produced in the Santa Maria Valley, producing the majority of the county's high-yield crops, including strawberries, broccoli, lettuce, cauliflower, and celery. The hills to the south and east of the valley are primarily used for vineyards and cattle grazing. Approximately 147,491 acres are zoned for agricultural land (AG) within the region, including AG-I, AG-I-10, AG-I-20, AG-II, AG-II-40, AG-II-100, and AC (Agricultural Commercial) (County of Santa Barbara Planning & Development Department [P&D] 2018). Of these agricultural lands, 97, 308 acres are enrolled under Williamson Act contracts in the Agricultural Preserve Program, approximately 66 percent of the region's agricultural lands.



The Santa Maria Valley produces the majority of Santa Barbara County's agricultural value and contains the largest concentration of prime agricultural lands. High yield crops produced in this region include strawberries, broccoli, lettuce, cauliflower, and celery.
Source: Santa Maria Times

The Santa Maria Region contains the largest concentration of Prime Farmlands (27,721 acres). This is, in part, because the Santa Maria and Sisquoc River flood plains provide level fields and highly fertile soils. The majority of agriculturally zoned lands near larger communities, such as Santa Maria, Guadalupe, and Orcutt are on the outskirts of developed areas and are zoned AG-II. A few parcels to the east of Santa Maria are zoned AG-I-10. Prime Farmland and Farmland of Statewide Importance are also concentrated on the outskirts of these developed areas, with a few exceptions

located within the City of Santa Maria. Smaller communities, such as Sisquoc, Garey, and Casmalia, consist primarily of small blocks of residential-zoned land surrounded by land zoned as AG-II. In Garey, two AG-I zoned blocks exist to the north and south of residential areas. Most land in and around these communities is classified as Prime Farmland and Farmland of Statewide Importance. The land surrounding Casmalia is either Grazing Lands or not designated as Important Farmland (Department of Conservation, Division of Land Resource Protection 2023a; County P&D 2018).

Orcutt

The community of Orcutt is located directly south of the City of Santa Maria and north of Solomon Hills, Los Alamos, and the Santa Ynez Valley. All of the agriculturally zoned land in Orcutt is located outside of the concentrated urban areas and residential neighborhoods. West Orcutt contains the largest concentration of cultivated agriculture, encompassing roughly 830 acres on the outskirts of the residential areas. Agriculture in and around Orcutt is predominantly non-irrigated livestock grazing and strawberries. Several areas designated as Unique Farmlands and Farmlands of Statewide Importance are located west of Orcutt and southwest of the Santa Maria Airport. Land to the east of the more concentrated residential areas in Orcutt is designated as Farmland of Statewide Importance and Unique Farmland and is zoned as agriculture (Department of Conservation, Division of Land Resource Protection 2023a).

A roughly 1,200-acre site in West Orcutt (Assessor Parcel Numbers [APNs] 111-240-005, -007, -018, -020, -024. -025, -026, -027, -028, and -029) is currently zoned as residential (Residential Ranchette/RR-20), but over 480 acres are used for agricultural production (County P&D 2018). This site is bordered to the west by Black Road, to the north by Dutard Street, to the east by the Santa Maria Airport, and to the south by Casmalia Road (County P&D 2018).

Lompoc Valley

Approximately 275,501 acres of the unincorporated areas within Lompoc Valley are designated for agricultural land uses. Of these agricultural lands, 118,669 acres are enrolled under Williamson Act contracts in the Agricultural Preserve Program, equating to approximately 43 percent of the region's agriculturally zoned lands. The Lompoc Valley contains 13,125 acres of Prime Farmlands associated with the Santa Ynez River watershed. The majority of agriculturally zoned lands in this region are located outside of the developed residential areas of Lompoc and are zoned as AG-II-40 and AG-II-100 (County P&D 2018). One roughly 9-acre block located east of River Park Road and west-adjacent to Highway 246 is zoned AG-I-5. Large areas of Prime Farmland are located to the west and northeast of Lompoc and are zoned as AG-II-40, AG-II-100, and AG-I-5. Agriculturally zoned lands in the Mission Hills and Vandenberg Village areas are on the outskirts of developed residential areas. Most of this land is designated as Grazing Land or Other Land, with a small area of Unique Farmland south of Celestial Way in Vandenberg Village (Department of Conservation, Division of Land Resource Protection 2023a; County P&D 2018).

Santa Ynez Valley

The Santa Ynez Valley has approximately 247,456 acres designated for agricultural land uses. Approximately 133,755 acres in the unincorporated areas of the valley are enrolled under Williamson Act contracts in the Agricultural Preserve Program, equating to approximately 54 percent of the region's agricultural lands. Much of the agricultural production occurs on the 7,361 acres of Prime Farmland surrounding the developed communities and along the Santa Ynez River. Wine grapes are

particularly well suited to the soil and climate throughout the valley, and vineyards have expanded rapidly over the last decades (County of Santa Barbara 2009a). Growing tourism and residential popularity of this region have led to conflicts with agricultural resources resulting from the expansion of ranchette, residential, and visitor-serving commercial land uses (County of Santa Barbara 2009a).

Most agriculturally zoned land within the unincorporated area of the county is located outside of the developed, urban areas. South of the urban areas, blocks of Prime Farmland and Unique Farmland are found in areas zoned AG-I and AG-II. The unincorporated community of Ballard consists of a small block of land zoned as residential, with surrounding lands primarily zoned as AG-I. Small areas of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are found to the north of the residential area along Alamo Pintado Road in areas zoned as AG-I-10 and AG-I-40. Additional areas of Prime Farmland and Farmland of Statewide Importance are located south of the residential area in areas zoned as AG-I-20. Lands to the east and west of the community are primarily Grazing Lands zoned as agriculture (Department of Conservation, Division of Land Resource Protection 2023a; County P&D 2018).

Cuyama Valley

Agricultural activity in the Cuyama Valley consists primarily of irrigated row crops in level or gently sloping areas, with livestock grazing in foothill areas. Agricultural land uses are dominant within the region, comprising approximately 361,771 acres in the Cuyama Valley, with approximately 16,554 acres of Prime Farmland, though water availability has notably limited agricultural expansion. Irrigated crops include alfalfa, apples, carrots, garlic, deciduous fruit orchards, pistachios, wine grapes, hay/grain, peppers, potatoes, and onions. Rangeland livestock grazing of cattle and calves, sheep, and horses, as well as a small-scale dairy operation, also occur in the Cuyama Valley (County of Santa Barbara 2007). Approximately 129,925 acres of agricultural land are enrolled in Williamson Act contracts in the County Agricultural Preserve Program within this region, equating to roughly 36 percent of the region's agriculturally zoned lands. Most of this land is located well outside of residential areas.

In the community of Cuyama, a small block of residential and commercial land is surrounded by agricultural lands, most of which are zoned as AG-II. One block of land in the southeastern portion of Cuyama is zoned as AG-I/Educational Facility and is home to Cuyama Elementary School. The land surrounding Cuyama is predominantly Prime Farmland, and Unique Farmland and Farmland of Statewide Importance are also present on the northern side. A block of land zoned AG-II-100 is also designated Grazing Land. In the community of New Cuyama, agriculturally zoned lands are located on a large block bordered to the north by State Route (SR) 166 and to the west by Perkins Road. These lands are zoned AG-I and host several different types of land uses, such as residential and industrial development, in addition to agriculture. Nevertheless, much of the land is in active agricultural production. Grazing Land is located to the south and west of the developed residential areas of New Cuyama. Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are located to the north and south of developed areas (Department of Conservation, Division of Land Resource Protection 2023a; County P&D 2018).

South Coast

The South Coast contains approximately 53,399 acres of land designated for agricultural uses, including 3,045 acres of Prime Farmland in the Eastern Goleta Valley and Carpinteria Valley. Most soils found in the valley floor are prime, and soils in the foothills are relatively adaptable. The South Coast contains agricultural lands bordering urban areas in the foothills of the Santa Ynez Mountains from Goleta to Carpinteria, as well as rural agricultural regions located along the Gaviota coast. Agriculture along the South Coast, from Goleta to Carpinteria, is primarily made up of smaller parcels engaged in high-value irrigated crops, such as tropical and sub-tropical fruit orchards and flowers. Most of the county's greenhouses exist within the South Coast. Approximately 25,860 acres of agricultural land are enrolled in Williamson Act contracts in the County Agricultural Preserve Program within this region, equating to roughly 48 percent of the region's 53,399 acres of agriculturally zoned lands.



The South Patterson Agricultural Area provides over 400 acres of land designated for agricultural uses. This area is highly productive and is used to grow row crops, greenhouse and nursery products, cut flowers/foliage, and orchards.
Source: Santa Barbara Independent

Eastern Goleta Valley

The Eastern Goleta Valley is located between the City of Santa Barbara and the City of Goleta. Eastern Goleta Valley agriculture is the beneficiary of a south-facing aspect, gentle topography, deep fertile soils, and a mild ocean-side climate which allow for a wide variety of crops. The mild seasons allow for year-round growing. North of Cathedral Oaks Drive is rural and generally supports orchards and other rural agricultural uses within the foothills of the Santa Ynez mountains. The southern portion of Eastern Goleta Valley is urban and contains isolated blocks of urban agricultural areas comprising row crops, orchards, and greenhouses within otherwise developed residential neighborhoods and commercial areas.

Due to consumer demand and higher profit margins, much of the agriculture in this region is high-value greenhouse and row crops. Urban agriculture in the region exists but is limited and faces many barriers. Most of the nursery and row crops in the area occur within two urban agricultural areas, South Patterson and San Marcos (County of Santa Barbara 2015).

The South Patterson Agricultural Area is over 400 acres of agriculturally designated (A-I-5 and A-I-10) land reached via South Patterson Avenue, with parcels ranging from 8 to 64 acres in size. This block is located adjacent to the City of Goleta and is highly productive with a number of the parcels containing orchards, vegetable row crops, and nursery products in extensive greenhouses. The majority of the area has prime soils, but non-prime soils exist in the vicinity (County of Santa Barbara 2015). Notable agricultural properties and operations within the South Patterson Agricultural Area are described below:

- The Giorgi property supports an approximately 65-acre lemon and avocado orchard located on the north side of the South Patterson Agricultural Area. The site is zoned AG-I-10 and contains Class I (Prime) soils.

- The Por La Mar Nursery, an approximately 61-acre property also zoned AG-I-10, is located immediately adjacent to the south and contains greenhouses with foliage plantings.
- The approximately 15.85-acre Caird 2 property is bisected by Maria Ygnacio Creek, creating an approximately 9.9-acre western portion located along South Patterson Avenue and an approximately 6-acre eastern portion located at the western terminus of Rhoads Avenue. The roughly triangular 6-acre parcel is bordered on the east by Maria Ygnacio Creek and on the south by Atascadero Creek and a bicycle path. The site is zoned AG-I-10 and contains 1.63 acres of Class I (Prime) soils and 3.19 acres of Class II (Prime) soils. The site is adjacent to a residential development. The FMMP maps the site as Prime Farmland (4.68 acres) and Farmland of Statewide Importance (1.18 acres) (County of Santa Barbara 2015).



The San Marcos Agricultural Area includes 51 acres, including the San Marcos Growers nursery (pictured above), that are designated for agricultural uses, including high-value row crops, orchards, and nursery products.
Source: Noozhawk

The South Patterson Agricultural Area also includes several nursery and row crop operations on the coastal mesa south of Atascadero Creek and adjacent to More Mesa. This area is zoned AG-I-5 and AG-I-10 in the Coastal Zone and provides a combination of prime and non-prime soils.

The San Marcos Agricultural Area is a 51-acre AG-I zoned area made up of six parcels and adjacent to Hollister Avenue and Turnpike Road. This area includes Prime Farmland and Unique Farmland, as well as Grazing Land (Department of Conservation, Division of Land Resource Protection 2023a; County P&D 2018). San Marcos Growers is an approximately 33-acre site on two parcels zoned AG-I-5 located on the east side of San Marcos Road. San Marcos Growers is a commercial wholesale nursery with over 2,000 unique species of California native plants, as well as trees, vines, shrubs, perennials, ferns, succulents, ornamental grasses, and grass-like plants (San Marcos Growers 2022). The approximately 6-acre McCloskey Nursery property zoned AG-I-5 cultivates flowers and foliage in both greenhouse and outdoor environments, providing local products to farmers' markets in Santa Barbara and Ventura (McCloskey Nursery 2023). While zoned for agricultural uses (AG-I-5), the approximately 11-acre Montessori property within the San Marcos Agricultural Area is primarily vacant.

The Eastern Goleta Valley also supports several properties that are not currently zoned for agriculture but support existing agricultural uses. For example, Lane Farms covers 3.37 acres south of Hollister Avenue and Walnut Lane. The area is zoned Residential (10-R-I) but operates as an urban farm growing row crops and specializing in strawberries, sweet corn, lettuces, tomatoes, and squashes. They also operate a produce stand (County of Santa Barbara 2015; Lane Farms 2022). Another 1.5-acre site at the corner of Calle Real/North Patterson Avenue is currently being used for orchard crops but is not zoned for agricultural purposes. This site contains Class II (Prime) soils.

Other agricultural use areas include the Mistletoe/Carter Seed property, located adjacent to the southwest corner of the South Patterson Agricultural Area, which includes 35 acres and is leased from Southern California Gas Company. The parcels are zoned public utility but are used to grow flowers

for seed. The Rancho Tecolote Parcel includes 6 acres and is located in More Mesa. The parcel is zoned Residential but is used to grow avocados and lemons, and has Unique and Prime Farmland (County of Santa Barbara 2015).

Carpinteria

Carpinteria's agriculture revolves around orchards, open-field agriculture, and greenhouses. The Carpinteria Valley produces more than half of the county's cut flower and nursery products and comprises the largest and most concentrated area of agricultural greenhouses in the county, which support chrysanthemums, orchids, roses, and potted plants. In the unincorporated county, AG-I zoned land surround the City of Carpinteria, with AG-II zoned lands located further from the city in the Rural Area. Most of the land to the north, northeast, and northwest of the City of Carpinteria is Prime or Unique Farmland or Farmland of Statewide Importance. There is no agriculturally zoned land located within the Urban Area of the unincorporated county in the Carpinteria Valley (Department of Conservation, Division of Land Resource Protection 2023a; County P&D 2018). Greenhouse development (including shade structures and hoop structures) within the Carpinteria Valley is guided by the Carpinteria Agricultural Overlay District (Santa Barbara County Code Section 35-102F). As of 2017, there were approximately 449 acres of greenhouse-type structures within unincorporated Carpinteria Valley (east of Nidever Road). Of those, 333 acres were considered "true" greenhouses (pursuant to the County definition in the Santa Barbara County Land Use and Development Code [LUDC]), 61 acres were hoop structures, and 58 acres were shade structures (County of Santa Barbara 2017). A total of 122 acres of greenhouse-type structures are on lands with Williamson Act contracts, representing approximately 27 percent of the total amount of Carpinteria greenhouses (County of Santa Barbara 2017). Avocados, as well as exotics, such as sapotes and cherimoyas, are grown on the unincorporated hillsides north of the City of Carpinteria. With the adoption of the Licensing of Cannabis Operations Ordinance (Chapter 50 of the Santa Barbara County Code), several commercial cannabis cultivation operations have been permitted in existing greenhouses in the Carpinteria area. As of 2022, the County approved 166 acres of the maximum 186 acres allowed for greenhouse cannabis in the Carpinteria Valley (Santa Barbara Independent 2022).

3.2.2.3 Farmland Mapping and Monitoring Program Categorization

The FMMP was developed by the Department of Conservation, Division of Land Resource Protection, in 1982. Important Farmland Maps, a hybrid of resource quality (soils), irrigation status, and land use information, are produced by the FMMP. The Department of Conservation, Division of Land Resource Protection divides land into seven general categories,[1] with Important Farmland comprising the first four categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (Department of Conservation, Division of Land Resource Protection 2023a, 2023b). Important Farmland contains soils best suited for producing food and forage, particularly for producing high-yield crops. The total area of FMMP lands throughout the unincorporated county varies by HMA (Table 3.2-3).

[1] The remaining land categories include: 1) grazing land; 2) urban and built-up land; and 3) other land. Please see Section 3.2.3.2, *Regulatory Setting* for further information on the Department of Conservation's land categories.

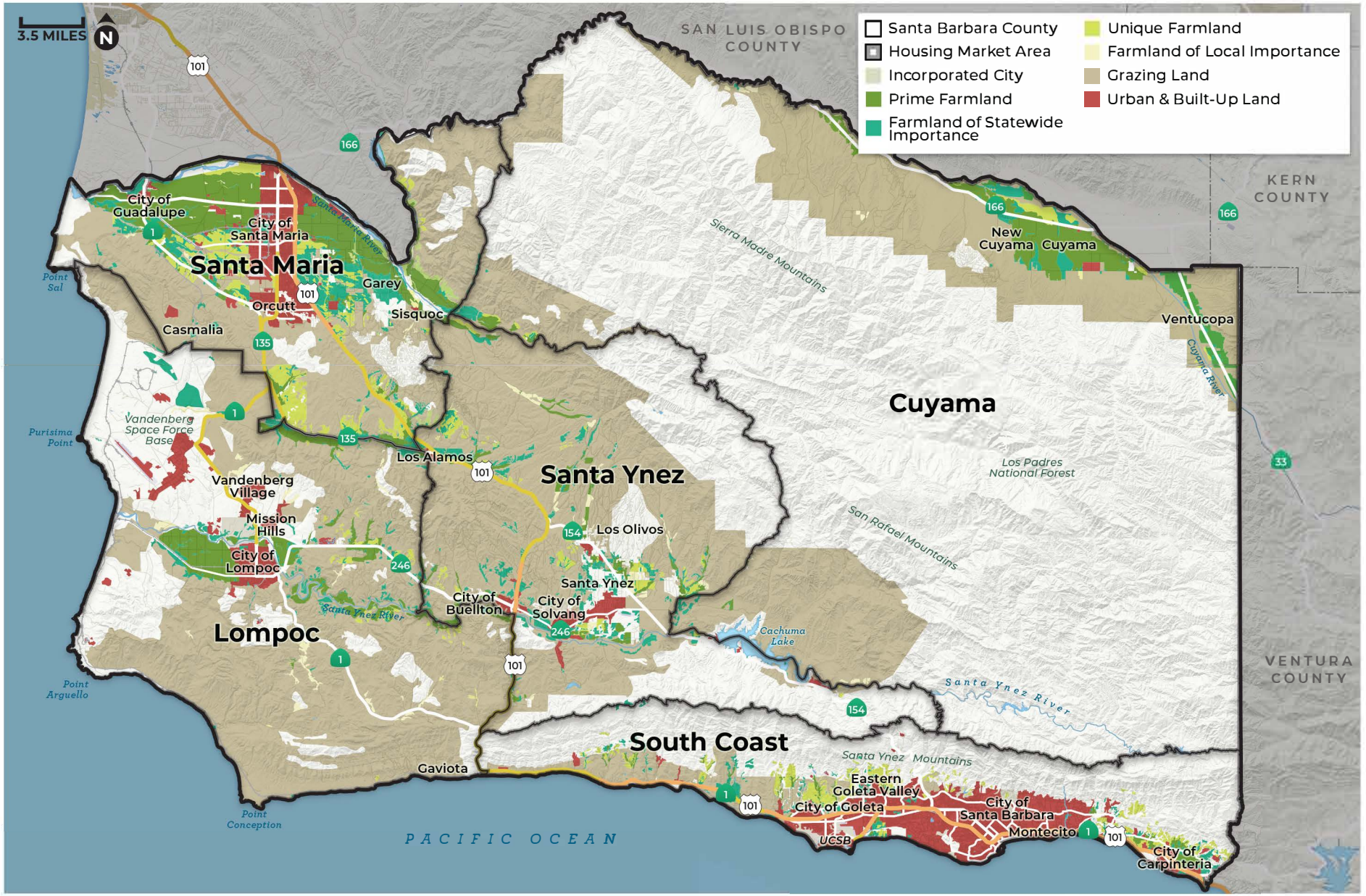
Table 3.2-3. Summary of FMMP Lands within the Unincorporated Areas of the County

FMMP Designation	Santa Maria Valley (acres)	Lompoc Valley (acres)	Santa Ynez Valley (acres)	Cuyama Valley (acres)	South Coast (acres)
Farmland of Local Importance	762	3,192	3,455	875	62
Farmland of Statewide Importance	8,573	1,295	1,041	2,158	580
Grazing Land	79,422	181,308	146,842	153,343	15,899
Prime Farmland	27,721	13,125	7,361	16,554	3,045
Unique Farmland	18,164	3,057	5,617	2,313	8,548
TOTAL	**134,641**	**201,977**	**164,317**	**175,243**	**28,132**

Notes:
[1] Acreage of total agricultural lands represents lands surveyed by the FMMP and includes Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land.
[2] Total land zoned for agriculture differs from agricultural land that is zoned AG-I or AG-II, which may include built-up land, roads, water, or other non-cultivation uses.
Source: Department of Conservation, Division of Land Resource Protection 2023a; County of Santa Barbara Assessor's Office 2023a.

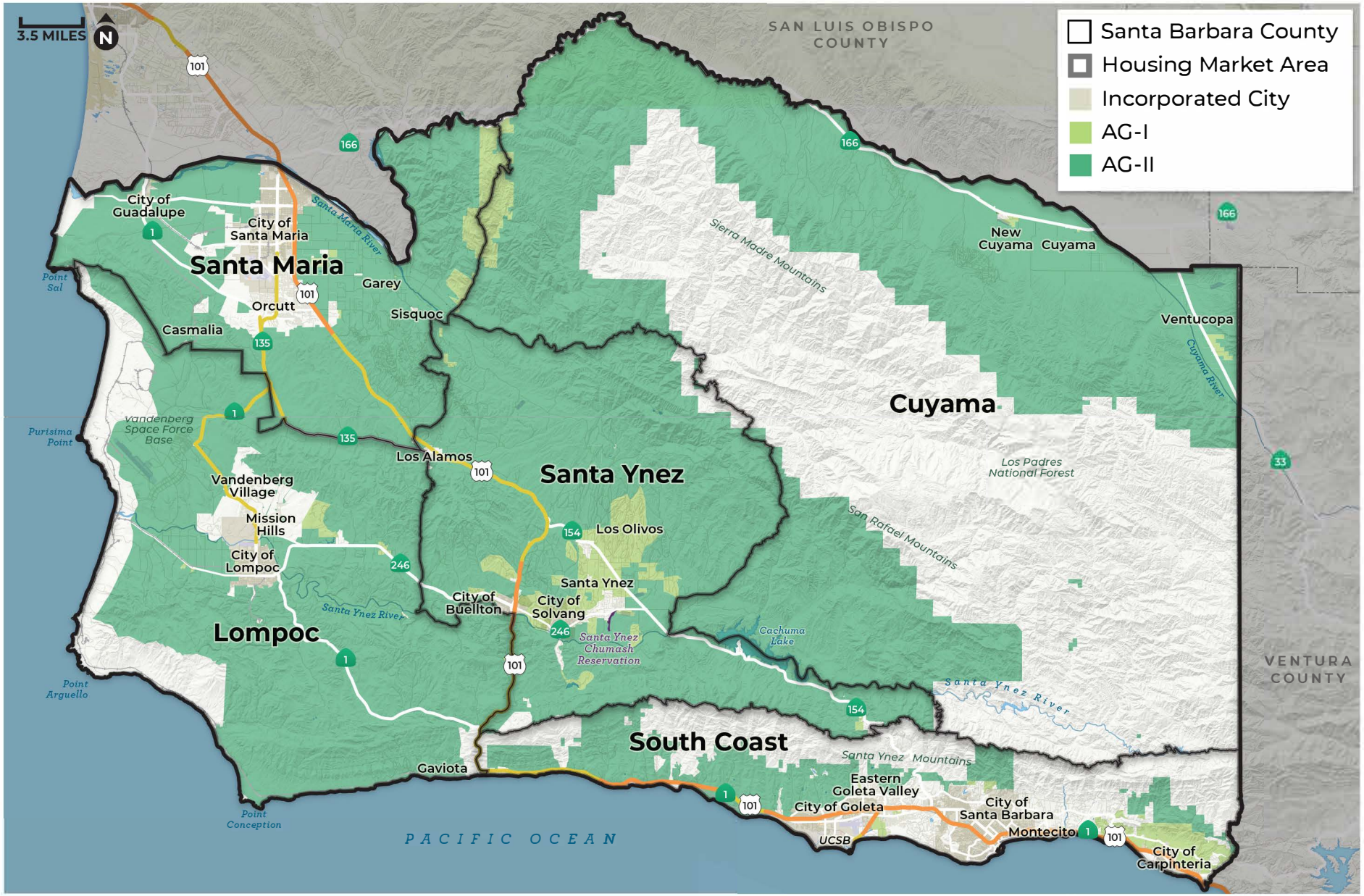
3.2.2.4 Other Benefits of Agriculture in Santa Barbara County

Agriculture provides many benefits to the county beyond the economic value. For instance, the presence of farms and ranches has been deemed to yield significant aesthetic and visual resource benefits to the residents of the county (County of Santa Barbara 2009a; Section 3.1, *Aesthetics and Visual Resources*). Other environmental values of agriculture include the benefit of large expanses of open space, preserves ecosystems and is an important habitat for special status species, contributions to soil fertility and water quality, and the ability to sequester carbon, which can offset global warming (American Farmland Trust 2007). Many of the lands within the county that are currently under some form of agriculture are developed with standard commercial agricultural operations, which include irrigated and fallow cropland, nurseries, vineyards, greenhouses, pasture and grazing land, and orchards, as well as industry agricultural development such as wineries and food processing facilities. Over the last 20 years, the general trend has been toward conversion of grazing, dry-farmed, or open land to more intensive agricultural production, such as orchards, irrigated row crops, and vineyards, which generally have higher production values per acre. Several factors have led to agricultural intensification, including high land values when compared to the relatively low economic yield of the cattle business, advances in water delivery technology, the emergence of vineyards as a profitable alternative to grazing on non-prime soils, and the availability of large capital investment (County of Santa Barbara 2009a). Rising land values and cost of inputs have also contributed to an increase in the conversion of agricultural land to non-agricultural uses.



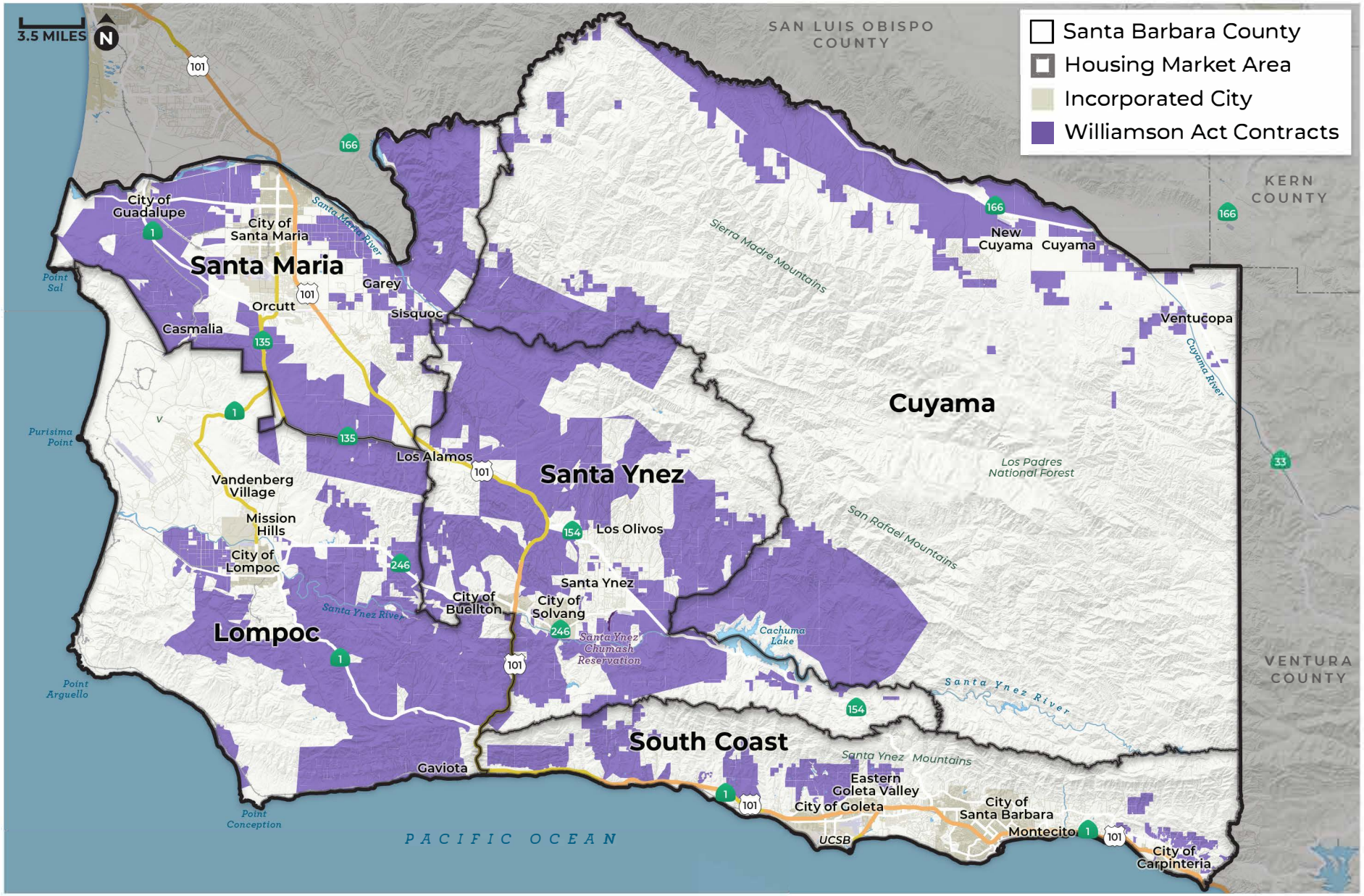
Santa Barbara County Important Farmlands (2018)

FIGURE 3.2-1



Santa Barbara County Agricultural Zoning

FIGURE 3.2-2



wsp

Santa Barbara County Williamson Act Contracts

FIGURE 3.2-3

3.2.3 Regulatory Setting

Federal, state, and local regulations have been enacted to protect agricultural resources in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.2.3.1 Federal

Farmland Protection Policy Act of 1981

The USDA administers the Farmland Protection Policy Act of 1981. The Act is intended to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses. The Act also requires these programs to be compatible with state, local, and private efforts to protect farmland.

Land Evaluation and Site Assessment (LESA)

The USDA administers the Land Evaluation and Site Assessment (LESA) system to help state and local officials make sound decisions about land use. Combined with Forest measures and Rangeland parameters, LESA can provide a technical framework to numerically rank land parcels based on local resource evaluation and site considerations. Combined with Forest measures and Rangeland parameters, LESA can provide a technical framework to numerically rank land parcels based on local resource evaluation and site considerations (USDA 2023b).

3.2.3.2 State

Department of Conservation, Division of Land Resource Protection

As previously described, the Department of Conservation established the FMMP in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of these lands throughout California. The FMMP is non-regulatory and was developed to inventory land and provide categorical definitions of Important Farmland and consistent and impartial data to decision-makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. Important Farmland Maps, a hybrid of resource quality (soils), irrigation status, and land use information, is produced by the FMMP. The latest update to the Important Farmland maps for Santa Barbara County was in 2018; an update based on 2020 data is currently in process. The Department of Conservation, Division of Land Resource Protection divides land into seven general categories, with Important Farmland comprising the first four categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (Department of Conservation, Division of Land Resource Protection 2023a). The best quality land for agricultural use is Prime Farmland. The descriptions of each category are as follows:

- **Prime Farmland.** Farmland that has the best combination of physical and chemical features and is able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to sustain high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- **Farmland of Statewide Importance.** Farmland similar to prime farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Unique Farmland.** Farmland with lesser quality soil that is used for the production of leading agricultural crops in the state. This land is usually irrigated but may include non-irrigated orchards or vineyards, which are found in some climatic zones in California. Land must have been used for crops at some time during the four years prior to the mapping date.
- **Farmland of Local Importance.** Land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee.
- **Grazing Land.** Land where existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, the University of California Cooperative Extension, and other groups interested in grazing activities. The minimum mapping unit for Grazing Land is 40 acres.
- **Urban and Built-up Land.** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or about six structures within a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, and public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment facilities, water control structures, and other developed purposes.
- **Other Land.** Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded by urban development and greater than 40 acres is mapped as Other Land.

California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is promulgated in California Government Code Section 51200-51297.4. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. Specifically, this legislation enables landowners who voluntarily agree to participate in the Williamson Act program to receive assessed property taxes according to the income-producing value of their property in agricultural use, rather than on the property's assessed market value. This saves landowners from 20 percent to 75 percent in property tax liability each year (Department of Conservation, Division of Land Resources Protection 2019).

The Williamson Act program is administered by the California Department of Conservation in conjunction with local governments, which administer the individual contract arrangements with landowners. The landowner commits the parcel to a 10-year "rolling" period wherein no conversion out of agricultural use is permitted. Each year the contract automatically renews unless a notice of non-renewal or cancellation is filed. In return, the land is taxed at a rate based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. An application for immediate cancellation can also be requested by the landowner, provided that the proposed immediate cancellation application is consistent with the cancellation criteria stated in the California

Land Conservation Act and those adopted by the affected county or city. Non-renewal or immediate cancellation does not change the zoning of the property. Participation in the Williamson Act program is dependent on county adoption and implementation of the program and is voluntary for landowners.

Pursuant to Government Code Section 51238.1, uses approved on contracted lands shall be consistent with all of the following principles of compatibility:

- The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels on other contracted lands in agricultural preserves.
- The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.
- The use will not result in the significant removal of adjacent contracted land from agricultural or open space use.

California Right to Farm Act (California Civil Code Section 3482.5)

The California Right to Farm Act (California Civil Code Section 3482.5) – enacted in 1981 – provides that a farming activity cannot be a public nuisance if all of the following factors are met:

- The activity is in support of the production of an agricultural commodity;
- The agricultural activity is commercial in nature;
- The activity is conducted "in a manner consistent with proper and accepted customs and standards as established and followed by similar agricultural operations in the same locality;"
- The farming activity must have been in operation for at least 3 years; and
- The farming activity was not a nuisance at the time it began.

The California Right to Farm Act does not require "best management practices" but instead simply allows adherence to "accepted" customs and practices. In addition, the statute specifically states that it prevails over any contrary provision of a city or county ordinance or regulation, but does allow cities and counties to require disclosures to be given to prospective home buyers that a dwelling is near an agricultural operation.

Farmland Security Zone Act

The Farmland Security Zone Act was passed by the California legislature in 1999 to ensure that long-term farmland preservation is part of public policy. Under the provisions of this act, a landowner already under a Williamson Act contract can apply for Farmland Security Zone status by entering into a contract with the county. Farmland Security Zone classification automatically renews each year for an additional 20 years. In return, for a further 35 percent reduction in the taxable value of land and growing improvements (in addition to Williamson Act tax benefits), the owner agrees not to convert agricultural land for nonagricultural uses.

Public Resources Code (PRC) Section 21060.1

PRC Section 21060.1 defines agricultural land for the purposes of assessing environmental impacts under the FMMP. As stated previously, the FMMP was established in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of these lands. The FMMP looks at agricultural land use and land use changes throughout California.

3.2.3.3 Local

County of Santa Barbara Comprehensive Plan

The County's Comprehensive Plan provides a framework for development and growth in the unincorporated county. The Agricultural, Environmental Resource Management, and Land Use elements of the County's Comprehensive Plan, along with the Coastal Land Use Plan (CLUP) and local community plans, contain various goals and policies that address agricultural resources, including the preservation and expansion of agricultural land use within the county for the cultivation of crops and the raising of animals. Under the County's Comprehensive Plan, agricultural lands are designated A-I, A-II, or AC by the Land Use Element and provide opportunities for a range of commercial agricultural operations. A-I parcels must be 5 acres or larger and include prime or non-prime farmlands and areas with agricultural uses that are located within Urban, Inner Rural, and Rural Neighborhood areas. A-II parcels must be 40 acres or larger and include farmlands and areas with agricultural uses located outside Urban, Inner Rural, and Rural Neighborhood areas. In lands designated A-II lands, general agriculture is permitted, including but not limited to livestock operations, grazing, and beef production, as well as more intensive agricultural uses.

The policies in the Comprehensive Plan outline the County's priority to preserve and, where feasible, expand and intensify agricultural land uses. Agricultural operations are encouraged in areas containing both prime and non-prime soils. Consistency with Comprehensive Plan goals and policies is further discussed in Section 3.10, *Land Use and Planning*. Relevant goals and policies are summarized below.

Agricultural Element

The Agricultural Element of the County's Comprehensive Plan serves as a guide for addressing the future use of agricultural lands and resources. It includes the following goals and policies applicable to the proposed Project governing the use, protection, and improvement of agricultural lands within the county.

Goal I: Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts) expansion and intensification shall be supported.

Policy I.A: The integrity of agricultural operation shall not be violated by recreational or other non-compatible uses.

Policy I.B: The County shall recognize the rights of operation, freedom of choice as to the methods of cultivation, choice of crops or types of livestock, rotation of crops and all other functions within the traditional scope of agricultural management decisions. These rights and freedoms shall be conducted in a manner which is consistent with: (1) sound agricultural practices that promote

the long-term viability of agriculture and (2) applicable resource protection policies and regulations.

Policy I.D: The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.

Policy I.E: The County shall recognize that the generation of noise, smoke, odor, and dust is a natural consequence of the normal agricultural practices provided that agriculturalists exercise reasonable measures to minimize such effects.

Policy I.F: The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.

Policy I.G: Sustainable agricultural practices on agriculturally designated land should be encouraged in order to preserve the long-term health and viability of the soil.

Goal II. Agricultural lands shall be protected from adverse urban influence.

Policy II.C: Santa Barbara County shall discourage the extension by the Local Agency Formation Commission (LAFCO) of urban spheres of influence into productive agricultural lands designated Agriculture II (A-II) or Commercial Agriculture (AC) under the Comprehensive Plan.

Policy II.D: Conversion of highly productive agricultural lands, whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.

Goal III: Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.

Policy III.A: Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.

Policy III.B: It is a County priority to retain blocks of productive agriculture within Urban Areas where reasonable, to continue to explore programs to support that use, and to recognize the importance of the objectives of the County's Right to Farm Ordinance.

Goal IV: Recognizing that agriculture can enhance and protect natural resources, agricultural operations should be encouraged to incorporate such techniques as soil conservation and sound fire risk reduction practices.

Policy IV.C: Grading and bush clearing for new agricultural improvements on hillsides shall not cause excessive erosion or downslope damage.

Environmental Resource Management Element (ERME)

The Environmental Resource Management Element (ERME) states that existing croplands on prime soils should be preserved. Agricultural lands on less than prime soil should be preserved insofar as possible. Under Category A, urbanization should be prohibited where existing croplands have a high agricultural suitability rating, a Class I or II soil capability classification, or where agricultural preserves are subject to Williamson Act agreements. Under Category B, urbanization should be prohibited except where existing croplands have a moderate or low agricultural suitability rating, a

Class III or IV soil capability classification, or with lands highly suitable for expansion of cultivated agriculture. It is noted that agricultural preserves, although not subject to environmental constraints, are included in Category A. The reason is that in entering into Williamson Act agreements, the County has made a legal commitment that the land will remain in agricultural use for a minimum of 10 years, subject to automatic annual renewal.

Land Use Element

The Land Use Element of the County's Comprehensive Plan has four fundamental goals relating to the environment, urbanization, agriculture, and open lands. These goals aim to steer growth at a rate that can be sustained by available resources; to prevent scattered urban development and balance housing and jobs; to preserve cultivated agriculture and lands with both prime and non-prime farmland; and to prioritize open lands for non-urban uses where not suitable for agriculture. The following goals of the Land Use Element are most applicable to the proposed Project.

> **Regional Goal, Agriculture:** In the Rural Areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses.

Community Plans

Santa Barbara County has 10 community or area plans. Each community plan contains goals, objectives, policies, action/programs, and development standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. A policy is a specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed. Several community plans – including the Eastern Goleta Valley Community Plan, the Orcutt Community Plan, and the Santa Ynez Valley Community Plan, include polices related to agricultural lands and agricultural production.

Eastern Goleta Valley Community Plan

As described in the Eastern Goleta Valley Community Plan,

> *"…the two remaining blocks of urban agriculture [in the Eastern Goleta Valley Community Plan area] present opportunities for innovative and productive cultivation and agriculture-based business. Sustaining urban agriculture as a land use, a local industry, and a character is a goal for the South Patterson Agricultural Area and the San Marcos Agricultural Area. Combined, these areas provide nearly 500 acres of land in the Urban Area for agricultural enterprises… Overall, this Plan retains agricultural land use designations for urban agricultural operations, and provides policies supporting the agricultural industry in Eastern Goleta Valley."*

Given the potential rezones that may occur within the Eastern Goleta Valley under Program 1 of the Housing Element Update, the relevant agricultural policies from the Eastern Goleta Valley Community Plan are provided below:

- **Policy LUR-EGV-3.1:** Residential and mixed-use development shall be compatible with existing neighborhoods, particularly as to architectural and urban design, character and function of local transportation facilities, and protection and enhancement of agricultural operations and natural resources.

- **Policy LUA-EGV-1.1:** Agricultural resources, agricultural land uses and operations, and distinctive urban and rural agricultural characteristics shall be preserved to the greatest extent feasible.
- **Policy LUA-EGV-1.2:** Non-agricultural development adjacent to agriculturally-designated property shall include buffers to protect agricultural land, operations, and characteristics.
- **Policy LUA-EGV-1.3: (INLAND)** Atascadero and Maria Ygnacio Creeks shall be maintained appropriately to serve as buffers between agricultural areas, recreational uses and adjacent commercial, industrial and residential uses.
- **Policy LUA-EGV-1.5: Urban Agricultural Land Uses:** Agricultural land within the Urban Area shall be preserved for urban agricultural uses to the greatest extent feasible.
- **Policy LUA-EGV-1.6: Urban Agricultural Land Use Conversion:** To the greatest extent feasible, any general plan amendment and/or rezone proposal in the Urban Area which results in a change of land use designation from agricultural to non-agricultural shall:

    1. Require a factual and substantive finding by the County that (a) the land is no longer appropriate for urban agricultural land uses following due consideration consistent with all policies of the Plan, or (b) there is an overriding public need for conversion to other uses. As part of the finding the County will:

        a. Evaluate and document factually and substantively the quality and extent of agricultural resources onsite and adjacent to the property, including, but not limited to, prime agricultural land, land in existing agricultural use, lands with prime soils, grazing land, land with agricultural potential, and lands under Williamson Act contracts.

    2. Require proposed land uses that:

        a. Are consistent with all policies of this Plan.

        b. Are compatible with each other and with neighboring land uses—whether agricultural or non-agricultural.

        c. Avoid partitioning or interrupting contiguous blocks of agriculturally-designated lands.

        d. Preserve and enhance environmental resources, including, but not limited to coastal bluff geology, habitat areas, visual resources, and watershed resources, and community characteristics, particularly with regard to agricultural heritage and natural environmental resources, and/or minimize environmental impacts.

        e. Include provisions for the community's social, economic and cultural well-being, and health and safety, such as public parks, open spaces, trails, habitat protection or restoration, and/or community gardens.

        f. Dedicate public open space for habitat preservation and/or public recreation and indicate the amount and extent.

        g. Provide public coastal access, parking, recreational trails, bike paths, and/or pedestrian routes.

h. Confine and cluster non-agricultural development adjacent to existing developed areas and transportation facilities to maximize preservation of open space, with the exception of passive public recreation improvements such as trails, signs and park facilities.

- **Policy LUA-EGV-2.2:** The housing needs of agricultural employees shall be considered in land use planning.

Coastal Land Use Plan (CLUP)

The CLUP is an element of the County's Comprehensive Plan that outlines future goals and policies for Santa Barbara County's Coastal Zone. Generally, the Coastal Zone extends inland 1,000 yards from the mean high tide line, but is broadened in specific locations to include nearby habitat and recreational and agricultural resources. The CLUP for Santa Barbara County was adopted in 1982 in response to the passage of the California Coastal Zone Conservation Act. The legislature established goals for future activity in the Coastal Zone including the prioritization of Coastal Zone-dependent land uses over other uses; enhancement and restoration of natural and man-made resources; orderly and balanced utilization and conservation of resources (accounting for local social and economic needs); and recreational opportunities and public access. There are no CLUP policies specific to the Project area relevant to agriculture; however, Policies 8-1 through 8-12 are generally applicable to all agricultural uses within the unincorporated county (within the Coastal Zone). Policies 8-3 and 8-4 are~~is~~ particularly applicable to this analysis:

- **Policy 8-3:** If a parcel is designated for agricultural use and is located in a rural area contiguous with the urban/rural boundary, conversion shall not be permitted unless:

  a. The agricultural use of the land is severely impaired because of physical factors (e.g., high water table), topographical constraints, or urban conflicts (e.g., surrounded by urban uses which inhibit production or make it impossible to qualify for agricultural preserve status), and

  b. Conversion would contribute to the logical completion of an existing urban neighborhood, and

  c. There are no alternative areas appropriate for infilling within the urban area or there are no other parcels along the urban periphery where the agricultural potential is more severely restricted.

- **Policy 8-4:** As a requirement for approval of any proposed land division of agricultural land designated as Agriculture I or II in the land use plan, the County shall make a finding that the long-term agricultural productivity of the property will not be diminished by the proposed division.

Article II, Coastal Zoning Ordinance (CZO)

Article II, Coastal Zoning Ordinance (CZO), a part of Chapter 35 (Zoning) of the Santa Barbara County Code, applies to the unincorporated Coastal Zone within Santa Barbara County as well as the Channel Islands. The CZO implements the CLUP by classifying and regulating the uses of land, buildings, and structures in the Coastal Zone. Pursuant to PRC Section 30500 of the California Coastal Act of 1976, the County must prepare a Local Coastal Plan for the unincorporated areas of the county within the

Coastal Zone. The ordinance contains the coastal zoning district maps, which apply the regulations of the ordinance to the properties in the coastal areas.

- **Section 35-64**

    1. If a lot is zoned for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, rezoning to a non-agricultural zone district shall not be permitted unless such conversion of the entire lot would allow for another priority use under the Coastal Act (e.g., coastal dependent industry, recreation and access, or protection of an environmentally sensitive habitat). Such conversion shall not be in conflict with contiguous agricultural operations in the area and shall be consistent with PRC Sections 30241 and 30242 of the Coastal Act.

    2. If a lot is zoned for agricultural use and is located in a rural area contiguous with the urban/rural boundary, rezoning to a non-agricultural zone district shall not be permitted unless:

        a. The agricultural use of the land is severely impaired because of physical factors (e.g., high water table), topographical constraints, or urban conflicts (e.g., surrounded by urban uses which inhibit production or make it impossible to qualify for agricultural preserve status), and

        b. Conversion would contribute to the logical completion of an existing urban neighborhood, and

        c. There are no alternative areas appropriate for infilling within the urban area or there are no other lots along the urban periphery where the agricultural potential is more severely restricted.

Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones

The Uniform Rules are used to implement the Williamson Act and administer the Agricultural Preserve Program in the county. The Uniform Rules define eligibility requirements and compatible uses to which each participating landowner must adhere in order to receive a reduced tax assessment, based on acreage of prime and nonprime farmlands. The Uniform Rules' eligibility criteria require that an agricultural preserve consist of no less than 100 acres for non-prime agricultural lands, 40 acres for prime agricultural lands, or a combination of 40 acres that may consist of a combination of 20-acre prime agricultural lands, or 5-acre minimum super prime agricultural lands. The County also enforces Williamson Act contract requirements to ensure that tax assessments for contracted lands are appropriate.

Land enrolled in the County's Agricultural Preserve Program is to be used principally for commercial agricultural production, with the exception of land enrolled for open space or recreational purposes. Uniform Rule 2 provides general compatibility principles, as established under the Williamson Act (Government Code Section 51238.1), to be applied to all land uses and activities occurring within contracted land, including both Williamson Act and Farmland Security Zone contracts. The remaining sections provide more specific criteria and requirements for specific land uses and activities that the Board of Supervisors has determined must be met for the use or activity to be considered compatible with agriculture and consistent with the Williamson Act

The Uniform Rules also establish standards for the termination of Williamson Act contracts and the withdrawal of land from the Agricultural Preserve program, without impairing the integrity of the program. Uniform Rule 6 provides standards for the termination of contracts via several methods, which include non-renewal, cancellation, annexation, public acquisition, and rescission. Uniform Rule 6-1.1 Nonrenewal, states,

> *"[w]ithdrawal by a notice of nonrenewal is the preferred method considered in all instances, whether for all or part of the contracted land where whole parcels are involved. This method is open to either party to the contract, does not require a finding of fact, and provides for an adjustment in land assessed values, pursuant to Section 426 of the Revenue and Taxation Code."*

Upon serving a notice of non-renewal, the existing contract remains in effect for the balance of the period remaining, typically a period of 10 years. Uniform Rule 6-1.2 Cancellation, outlines the process for a landowner to petition the Board of Supervisors for the cancellation of his or her Williamson Act or Farmland Security Zone contract. The Board of Supervisors may grant tentative approval for cancellation of a Williamson Act contract only if it can make all of the findings for either Government Code Section 51282 (a)(1)(b), or Government Code Section 51282(a)(2)(c).

The following rules apply:

2-1. Principles of Compatibility

A. Uses approved on contracted lands shall be consistent with all of the following principles of compatibility:

1. The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves.

2. The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.

3. The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use. In evaluating compatibility, the Board of Supervisors shall consider the impacts on non-contracted lands in the agricultural preserve or preserves.

2-1.2. Other Compatibility Criteria

1. The use does not result in the significant increase in the density of the temporary or permanent human population that could hinder or impair agricultural operations on the subject property and/or other agricultural lands in the vicinity.

2. The use does not require and will not encourage the extension of urban services such as sewer or the upgrade of public roads to urban standards that could encourage premature conversion of agricultural land to non-agricultural uses.

Agricultural Nuisances and Consumer Information Ordinance, Article V, §3-23 et seq. ("Right-to-Farm Ordinance")

The County's Right-to-Farm Ordinance protects agricultural land uses from conflicts with nonagricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation. The purpose of the ordinance is to preserve and protect agricultural zoned lands for exclusive agricultural use; to support and encourage continued agricultural operations in the county; and to forewarn prospective purchasers or residents of property adjacent to or near agricultural operations of the inherent potential problems associated with such purchase or residence including, but not limited to, the sounds, odors, dust, and chemicals that may accompany agricultural operations.

Projects that are proposed and/or approved in the county proximate to agriculturally zoned lands are often required to provide notice to future residents, tenants, and users of the Right-to-Farm.

County of Santa Barbara Agricultural Advisory Committee

The County of Santa Barbara's Agricultural Advisory Committee (AAC) was established in 1995. The duty of the AAC is to provide advice to the Board of Supervisors, Planning Commission, and other County departments on matters related to agriculture. The AAC may review matters that have agricultural resource issues (i.e., land use, economics, pesticides, legislation, water, regulatory issues, property rights, and agricultural practices) or may affect agricultural resources including but not limited to policy and ordinance changes, departmental projects or programs, annexation requests by cities, other agency programs, and specific projects that have broad implications to agriculture. The AAC is advisory in nature and has no authority to approve, deny, or require modifications to any matter or project under the committee's consideration. The AAC consists of 12 members and represents the interests of the Board of Supervisors; the Santa Barbara County Flower and Nursery Center Association; the Central Coast Wine Growers Association; the Santa Barbara County Farm Bureau; the Grower-Shipper Vegetable Association; the Santa Barbara County Cattlemen's Association; the California Strawberry Commission/Santa Barbara County Strawberry Growers; and California Women for Agriculture (AAC 2022).

County of Santa Barbara Land Use and Development Code

The LUDC constitutes a portion of Chapter 35 of the Santa Barbara County Code. The LUDC conducts the policies of the County's Comprehensive Plan and Local Coastal Program by classifying and regulating the uses of land and structures within the County. The LUDC is adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the County (Section 35.10.010 – Purpose of LUDC).

Section 35.21.030 lists allowable land uses on agriculturally zoned lands. Development within agricultural zones should be designed, constructed, and established in compliance with the requirements in Section 35.21.050 of the LUDC and all applicable standards in Article 35.3 through Article 35.7 of the LUDC.

Agricultural Buffer Ordinance

Agricultural buffer regulations (Section 35.30.025 of the LUDC and Section 35-144O of the Article II CZO, adopted in 2013 and 2015 respectively) implement Comprehensive Plan policies by establishing development standards between agricultural uses and new non-agricultural development and uses.

Buffers are used to minimize potential conflicts between agricultural and adjacent land uses that result from noise, dust, light, and odor incidental to normal agricultural operations as well as potential conflicts originating from residential and other non-agricultural uses such as domestic pets, insect pests, and invasive weeds. This ordinance applies to inland and coastal areas of the county when there is a discretionary application for non-agricultural development which: 1) is located within an Urban or Inner Rural Area, on an Existing Developed Rural Neighborhood (EDRN), or located on property zoned industrial that is located in the Rural Areas; and 2) is a project site located immediately adjacent to agriculturally zoned land that is located in a Rural Area. The ordinance does not apply to agriculture in the Urban Area. The agricultural buffer width can range from 100 to 400 feet depending on the type of agriculture and proposed non-agricultural use or development. The buffer is required to be located on the lot which contains the non-agricultural project, adjacent to the common lot line between the project site and the adjacent agricultural lot.

Carpinteria Agricultural Overlay District, County Code Section 35-102F.2

The Carpinteria Agricultural Overlay District identifies areas where future development of greenhouses shall be regulated in accordance with this overlay district to control the extent and proliferation of greenhouses in the area. The provisions of this overlay district that apply to greenhouses shall also apply to shade structures and hoop structures unless expressly stated otherwise. The provisions of this overlay district apply to AG-I-zoned lands in the Coastal Zone of the Carpinteria Valley.

3.2.4 Environmental Impact Analysis

This section discusses the potential agricultural resource impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.2.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to agricultural~~cultural~~ resources if it would:

a. Convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract.

c. Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in the conversion of farmland to non-agricultural use.

County of Santa Barbara Environmental Thresholds and Guidelines

The County Agricultural Resource Guidelines that are set forth in the County's *Environmental Thresholds and Guidelines Manual* (2021) supplement Appendix G of the CEQA Guidelines at the local level.

As described in the County's Environmental Thresholds and Guidelines Manual, the County Initial Study form contains two questions pertaining to impacts on agricultural resources. The first is as follows:

10.d. Will the proposal result in the conversion of prime agricultural land to nonagricultural use, impairment of agricultural land productivity (whether prime or nonprime), or conflict with agricultural preserve programs?

The following weighting system is provided to perform a preliminary screening of a project's agricultural impacts during the initial study process. The initial study screening looks at the value of a site's agricultural suitability and productivity, to determine whether the project's impact on loss or impairment of agricultural resources would be a potentially significant impact. These are guidelines, to be used with flexibility in application to specific sites, taking into account specific circumstances and specific agricultural uses. The weighted point system is utilized to assign relative values to particular characteristics of a site's agricultural productivity (e.g., soil type, water supply). Where the points from the following formula total 60 or more, the following types of projects will be considered to have a potentially significant impact:

- A division of land (including Parcel and Final Maps) which is currently considered viable but would result in parcels which would not be considered viable using the weighting system.
- A Development Plan, Conditional Use Permit, or other discretionary act which would result in the conversion from agricultural use of a parcel qualifying as viable using the weighting system.
- Discretionary projects which may result in substantial disruption of surrounding agricultural operations.

If a potentially significant impact is identified using these criteria, furthermore detailed, site-specific evaluation of agricultural impacts is completed in an EIR. This analysis should focus upon the factors and criteria, but not the points, in the weighting system of these guidelines, and any other relevant factors such as the history of agricultural use on the site, land use trends, etc. Final determination of the project's level of impact will be based on this analysis.

A second question on agricultural land resources is included in the County's Initial Study under Land Use:

3. *Will the proposal result in any effect [potentially significant adverse effect] upon any unique or other farmland of State or Local Importance?*

The State Important Farmlands Map is used in answering this question. The map is also considered in applying points under the "Agricultural Suitability" category.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. As a result, the impact analysis provided below does not evaluate individual impacts at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for the lower and moderate-income affordability levels.

The programmatic analysis provided by this Program EIR addresses the potential for the Housing Element Update to directly or indirectly affect agricultural resources within county unincorporated areas, particularly within areas mapped as Prime Farmland or Other Important Farmland, including Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. Additionally, this analysis addresses the potential for direct conversion of agricultural lands, the potential for conflicts with agricultural operations, and the loss of agricultural viability. The impact analysis also assesses consistency with agricultural zoning, agricultural policies, and Williamson Act contracts, which are guided by the County's *Uniform Rules for Agricultural Preserves and Farmland Security Zones*. (Land use and policy consistency issues are also addressed in Section 3.10, *Land Use and Planning*.) While the analysis considers the County's scoring system to determine the agricultural viability of areas potentially affected by the proposed Project, as a programmatic analysis, a site-specific calculation is not feasible. Instead, wherever possible, examples of potential housing sites included in the Housing Element Update are identified to illustrate programmatic impacts associated with the proposed Project. Geographic Information System (GIS) analysis is also employed to estimate the acreage associated with future housing development that may affect existing agricultural resources.

The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. Key resources and data used in the preparation of this section include the Agricultural Element and the Land Use Element of the County's Comprehensive Plan, relevant community plans (e.g., Eastern Goleta Valley Community Plan), Santa Barbara County Code, U.S. Natural Resources Conservation Service (NRCS) Soil Survey Maps, FMMP maps, and County GIS data.

3.2.4.2 Project Impacts

Table 3.2-4 provides a summary of the proposed Project's impacts related to agricultural resources. A detailed discussion of each impact follows.

Table 3.2-4. Summary of Agricultural Resources Impacts

Agricultural Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact AG-1. The proposed Project would potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural uses.	Potentially significant	No mitigation feasible	Significant and unavoidable impacts
Impact AG-2. The proposed Project would potentially convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning, but would not conflict with Williamson Act contracts or the County's agricultural preserve programs.	Potentially significant	No mitigation feasible	Significant and unavoidable impacts
Cumulative Impacts	Potentially significant	No mitigation feasible	Significant and unavoidable impacts

Impact AG-1. The proposed Project would potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural use.

The future potential residential and mixed use development enabled under the Housing Element Update would potentially convert existing agricultural lands that are designated Prime Farmland, Unique Farmland, and Farmland of Statewide Importance according to the FMMP (Table 3.2-5). Based on the sites inventory in the North County, the proposed Project could result in development that would convert 19.4 acres of Prime Farmland and 5 acres of Farmland of Local Importance. However, this potential conversion of approximately 25 acres of FMMP lands in the North County would be nominal relative to the extent of FMMP lands, equating to far less than 1 percent of total FMMP lands in the region (Table 3.2-3 and Figure 3.2-3). In contrast, the potential to convert FMMP lands on the South Coast would be substantial. Potential rezones and pending projects within the South Coast would result in development that would eliminate approximately 146.19 acres (4.8 percent) of Prime Farmland, 118.9 acres (1.4 percent) of Unique Farmland, and 123.45 acres (21.3 percent) of Farmland of Statewide Importance within the South Coast; no conversion of Farmland of Local Importance is anticipated based on the sites inventory prepared for the Housing Element Update.

Table 3.2-5. Summary of Potential Housing Sites in Designated FMMP Lands (Acres)

FMMP Designation	South Coast (acres)	North County			
		Lompoc Valley (acres)	Santa Maria Valley (acres)	Santa Ynez Valley (acres)	Cuyama Valley (acres)
Total Acres of Designated Farmland Potentially Affected by the Sites Inventory					
Existing Vacant Sites	--	--	--	**12.15**	--
Prime Farmland	--	--	--	*7.15*	--
Unique Farmland	--	--	--	--	--
Farmland of Statewide Importance	--	--	--	--	--
Farmland of Local Importance	--	--	--	*5.0*	--
Rezones	**259.8**	--	--	--	--
Prime Farmland	*146.19*	--	--	--	--
Unique Farmland	*118.9*	--	--	--	--
Farmland of Statewide Importance	*116.47*	--	--	--	--
Farmland of Local Importance	--	--	--	--	--
County-owned Sites	--	--	--	--	--
Prime Farmland	--	--	--	--	--
Unique Farmland	--	--	--	--	--
Farmland of Statewide Importance	--	--	--	--	--
Farmland of Local Importance	--	--	--	--	--
Pending Projects	**6.98**	**12.2**	--	--	--
Prime Farmland	--	*12.2*	--	--	--
Unique Farmland	--	--	--	--	--
Farmland of Statewide Importance	*6.98*	--	--	--	--
Farmland of Local Importance	--	--	--	--	--
Total by HMA	**266.78**	**12.2**	--	**12.15**	--
Prime Farmland	*146.19*	--	--	*7.15*	--
Unique Farmland	*118.9*	--	--	--	--
Farmland of Statewide Importance	*123.45*	--	--	--	--
Farmland of Local Importance	--	--	--	*5*	--
Total by RHNA Region	**266.78**	**24.35**			
Prime Farmland	*146.19*	*19.35*			
Unique Farmland	*118.9*	--			
Farmland of Statewide Importance	*123.45*	--			
Farmland of Local Importance	--	*5.0*			
Total Unincorporated County	**284.15**				

Table 3.2-5. Summary of Potential Housing Sites in Designated FMMP Lands (Acres) (Continued)

FMMP Designation	South Coast (acres)	North County			
		Lompoc Valley (acres)	Santa Maria Valley (acres)	Santa Ynez Valley (acres)	Cuyama Valley (acres)
Prime Farmland	*165.54*				
Unique Farmland	*118.9*				
Farmland of Statewide Importance	*123.45*				
Farmland of Local Importance	*5.0*				

Note: Some potential housing sites are located in more than one farmland designation. Therefore, those site acreages have been counted twice in the farmland designation rows (e.g., Prime Farmland and Unique Farmland). However, the totals in bold are acres within potential housing sites that contain FMMP lands and are counted once.

These impacts to FMMP lands would be especially pronounced within the Urban Area of the South Coast, where seven of the potential rezone sites are located within the South Patterson Agricultural Area and four of the potential rezone sites are located within the San Marcos Agricultural Area, as follows:

Potential Rezone Sites within the South Patterson Agricultural Area

- Rezone Site No. 1 (Giorgi)
- Rezone Site No. 2 (St. Athanasius Church)
- Rezone Site No. 3 (Scott)
- Rezone Site No. 4 (Ekwill)
- Rezone Site No. 5 (Caird 1)
- Rezone Site No. 6 (Caird 2)
- Rezone Site No. 7 (Caird 3)

Potential Rezone Sites within the San Marcos Agricultural Area

- Rezone Site No. 8 (San Marcos Growers 1)
- Rezone Site No. 9 (San Marcos Growers 2)
- Rezone Site No. 10 (McCloskey Lelande)
- Rezone Site No. 17 (Montessori)

Of these seven potential rezone sites within the South Patterson Agricultural Area and the four potential rezone sites in the San Marcos Agricultural Area, only Rezone Site No. 10 (McCloskey Lelande) and No. 17 (Montessori) are not designated as FMMP lands. Of these, Rezone Site No. 10 (McCloskey Lelande) currently operates as a nursery producing high-value flower crops, and only Rezone Site No. 17 (Montessori) is primarily vacant/fallowed but has a long history of row crop cultivation up to at least 2009. The entirety of the other proposed rezone sites in these agricultural areas are designated as Prime Farmland, Unique Farmland, and/or Farmland of Statewide Importance, large portions of which are currently under active agricultural operations. Rezoning the South Patterson and San Marcos Agricultural Areas from agricultural uses to residential uses would lead to the development of these areas and the conversion of existing FMMP lands to urban/built-up lands. Further, the development of residential uses on Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) would result in the loss of 25 acres of FMMP farmland in the Coastal Zone of the Carpinteria area, including Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. These sites are highly productive with existing greenhouses and row crops. The only way to fully avoid impacts to FMMP lands would be to eliminate potential housing sites from future development. However, doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets. Therefore, impacts would remain *significant and unavoidable.*

Impact AG-2. The proposed Project would potentially convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning, but would not conflict with Williamson Act contracts or the County's agricultural preserve programs.

Based on the list of contract lands from the Santa Barbara County 2020 Agricultural Preserve Contract List, none of the potential rezone sites in the sites inventory prepared for the Housing Element Update would affect properties with active Williamson Act contracts (County of Santa Barbara 2022c). Therefore, the proposed Project would not result in a potential for land use or zoning change or amendments for properties currently under contract per the Williamson Act within the county, and impacts would be *insignificant*.

However, future residential and mixed use development enabled under the Housing Element Update could occur in existing agricultural zoning districts (i.e., AG-I and AG-II). As described for FMMP lands in Impact AG-I, the conversion of less than 38 acres of agriculturally zoned lands in the North County would be nominal relative to the expansive areas designated for agriculture that would remain with the proposed Project (Table 3.2-2 and Figure 3.2-2). However, the conversion of approximately 366 acres of agriculturally zoned lands within the South Coast would represent a substantial portion of lands zoned for agriculture within this region.

Based on the sites inventory prepared for the Housing Element Update, there are three potential rezone sites comprising 119.5 acres located in the County's Rural Area that could be rezoned to Design Residential (DR) zoning. All three potential rezone sites are on the South Coast. Rezone Site No. 11 (Glen Annie) is zoned AG-II-40 and located north of the City of Goleta; this is currently developed as a golf course and is surrounded by residential uses and Dos Pueblos High School to the south, open lands and golf course to the west, and open lands, golf course, and productive rural agricultural uses to the north and east~~productive rural agricultural uses such as orchards~~. Further, if selected Rezone Site No. 15 (Van Wingerden 1) would rezone 15 acres currently zoned AG-I-5 and Rezone Site No. 16 (Van Wingerden 2) would rezone 10 acres zoned AG-I-10; both sites are located within the Coastal Zone and would be rezoned to DR adjacent to the City of Carpinteria. These sites are highly productive with existing greenhouses and row crops and are subject to the goals and policies of the CLUP and Article II CZO, which supersede policies of the Agricultural Element due to the location of these sites within the Coastal Zone. Rezoning these sites would eliminate agricultural zoned lands in the Coastal Zone in the Carpinteria Valley and expand residential uses in the Carpinteria Agricultural Overlay District area, which comprises a contiguous urban agricultural area that supports extensive greenhouse, nursery, and row crop operations in the South Coast. If selected as part of Program 1 of the Housing Element (Potential Rezone Program), rezoning of these sites for higher-density (i.e., 20 units per acre or more) would convert existing productive agricultural land in the Rural Area to urban development. This conversion would result in a substantial loss of agricultural resources on the South Coast.

Table 3.2-6. Summary of Potential Housing Sites with Existing Agricultural Zoning (Acres)

Zoning District	South Coast (Acres)	North County			
		Lompoc Valley (Acres)	Santa Maria Valley (Acres)	Santa Ynez Valley (Acres)	Cuyama Valley (Acres)
Total Acres of Agriculturally Zoned Lands Potentially Affected by the Sites Inventory					
Existing Vacant Sites	--	--	--	--	--
AG-I Zoned Lands	--	--	--	--	--
AG-II Zoned Lands	--	--	--	--	--
Rezones	**365.77**	--	--	--	**37.88**
AG-I Zoned Lands	*271.07*	--	--	--	*37.88*
AG-II Zoned Lands	*94.7*	--	--	--	--
County-owned Sites	--	--	--	--	--
AG-I Zoned Lands	--	--	--	--	--
AG-II Zoned Lands	--	--	--	--	--
Pending Projects	--	--	--	--	--
AG-I Zoned Lands	--	--	--	--	--
AG-II Zoned Lands	--	--	--	--	--
Total by HMA	**365.77**	--	--	--	**37.88**
AG-I Zoned Lands	*271.07*	--	--	--	*37.88*
AG-II Zoned Lands	*94.7*	--	--	--	--
Total by RHNA Region	**365.77**	**37.88**			
AG-I Zoned Lands	*271.07*	*37.88*			
AG-II Zoned Lands	*94.7*	--			
Total Unincorporated County	**403.65**				

As described in Impact AG-1 above, Rezone Site Nos. 1 through 7 are located within the South Patterson Agricultural Area adjacent to the City of Goleta in the County's Urban Area. Similarly, Rezone Site Nos. 8 through 10 and Rezone Site No. 17 are located within the San Marcos Agricultural Area in the center of Eastern Goleta Valley in the County's Urban Area. Together, the rezoning of these sites from AG to DR zoning would result in the loss of the majority of agriculturally zoned lands in the over 400-acre South Patterson Agricultural Area and the entirety of the San Marcos Agricultural Area. As a result of the Project, only 70 acres of land zoned for agriculture would remain in the South Patterson Agricultural Area north of Atascadero Creek. Additionally, in Cuyama Valley, Rezone Site No. 36 (Blue Sky Property) would convert 37.9 acres of land zoned AG in the Urban Area to a mix of higher-density residential and commercial development. Rezoning of these potential housing sites under Program 1 of the Housing Element Update would result in the loss of approximately 372.8 acres of agriculturally zoned land in the Urban Area.

In addition to the direct conversion of agricultural zoned lands, the Potential Rezone Program under Program 1 of the Housing Element Update could convert portions of existing agricultural areas, leaving the remaining agricultural operations more vulnerable to conversion or land use conflicts with adjacent urban uses and decrease agricultural productivity. For example, Rezone Site No. 6 (Caird 3) is located at the lower corner of the South Patterson Agricultural Area and bordered to the south by Atascadero Creek. This potential rezone site includes approximately 25 acres of Unique Farmland and approximately 18 acres of Farmland of Statewide Importance. The potential rezone from AG-I-10 to DR-20/25 and AG-I-10 would leave an approximately 20-acre area of this site zoned for agricultural uses, thereby potentially preserving some FMMP lands within the South Patterson Agricultural Area. However, the remaining 20 acres would be located at the southern portion of the site and discontinuous from agricultural uses south of Atascadero Creek or regionally in the rural

areas. This agriculturally zoned remainder area could be isolated with limited access roads and surrounded by incompatible urban uses, thereby severely reducing and possibly eliminating the viability of these lands for agricultural uses. As such, the remaining area would likely not meet the criteria included in the NRCS's LESA, which considers soils, non-soil factors (e.g., water availability), factors related to development pressures, and other public values of a site (NRCS 2023). Similarly, while the agricultural zoning of properties on the coastal mesa portion of the South Patterson Agricultural area within the Coastal Zone south of Atascadero Creek would not change, the proximate rezoning of contiguous agricultural lands north of Atascadero Creek could foreseeably indirectly increase pressure to convert additional areas within the South Patterson Agricultural Area. Urban influences and incompatible uses adjacent to this area may make agricultural uses less viable over time. It is foreseeable that the remainder of agriculturally zoned land would be substantially burdened by small size, lack of continuity to other agricultural areas, limited roadway access, and potentially incompatible adjacent residential uses. Additionally, the proposed Project would individually and cumulatively result in the conversion of substantial areas of active, high-value agriculture on FMMP land zoned for viable agricultural uses.

Further, conversion of rezone sites located within the Coastal Zone would result in a loss of rural, coastal agricultural resources on the South Coast and could potentially conflict with relevant policies of the CLUP and Article II CZO. For instance, Policy 8-3 of the CLUP (Section 35-64 of the CZO) establishes prohibitions on the conversion of agricultural land located in the Rural Area that is contiguous with the urban/rural boundary, which includes Rezone Site Nos. 15 (Van Wingerden 1) and 16 (Van Wingerden 2), except under specific circumstances. Implementation of the Project may be inconsistent with such policies. However, through the site selection process, the County identified these sites as potentially necessary for rezoning in order to meet the RHNA plus 15 percent buffer due to the lack of alternative suitable infill sites in the Urban Area and due to their location serving as logical extensions of adjacent existing residential neighborhoods. Nevertheless,~~Therefore,~~ impacts associated with the conversion of agriculturally zoned lands, conflicts with agriculture zoning, and agricultural land productivity are considered *potentially significant.*

Mitigating the loss of agriculturally zoned lands and the decrease of agricultural productivity typically involves the conservation of other agriculturally viable lands. Based on the sites inventory, such mitigation would need to involve conservation or conversion of up to 403.65 acres of other agriculturally viable land elsewhere in the unincorporated county. However, there is nowhere in the County that can regain the agricultural acreage lost to new housing developments, and mitigation of direct and indirect impacts related to agricultural conversion is infeasible. The only way to fully avoid the potential impacts on agricultural resources would be to eliminate sites currently zoned and used for agriculture. However, doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets, as required under state law. The conversion of agriculturally zoned land along with the encroachment of residential land uses and the increasing isolation of remaining agriculturally zoned lands within the South Patterson Agricultural Area. As a result, the proposed Project would have a *significant and unavoidable* impact.

3.2.4.3 Cumulative Impacts

As described in Section 3.0, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of policies and initiatives, as well as development projects in the unincorporated areas of the county and the cities (Tables 3-6, 3-7, and 3-8; Appendix I). Potential impacts to agricultural resources are associated with both the proposed Project with additional

potential impacts from pending and current planning or development projects that could create cumulative impacts to such resources. Such cumulative projects would range from programmatic projects such as the Accessory Dwelling Unit (ADU) Ordinance Amendments, the Agricultural Enterprise Ordinance (AEO), and development and annexations proposed under the general plans and housing elements of several cities within the county, as well as individual development projects.

As described in Impact AG-1 and Impact AG-2, the potential rezoning of agricultural land under Program 1 of the Housing Element Update would result in a substantial loss of agricultural resources, including FMMP lands and agriculturally zoned land, particularly in the Rural Area of the South Coast and within the South Patterson Agricultural Area and San Marcos Agricultural Area in Eastern Goleta Valley The potential rezones, when considered along with pending projects discussed above, and residential, commercial, and agricultural development within or adjacent to the Project area could potentially result in disruption of agricultural productivity and result in a loss of agricultural resources within the Urban Area and the Rural Area, such as Rezone Site Nos. ~~11 (Glen Annie),~~ 15 (Van Wingerden 1), ~~and~~ 16 (Van Wingerden 2), and 36 (Blue Sky Property). Although affordable housing is required by the state and would meet local needs, the conversion of substantial amounts of agricultural land could create cumulative impacts on agricultural land countywide. The proposed Project would contribute to impacts on agricultural land by potentially converting hundreds of acres of agricultural land across multiple parcels. This impact would comprise a considerable contribution to the foreseeable loss of agricultural resources from cumulative projects in the county. While some cities may contemplate limited annexation of agricultural lands to accommodate housing needs, the potential loss associated with agricultural conversion for pending development and planning projects is low; that is, cumulative projects do not substantially involve the loss of agricultural land. In contrast, the Housing Element Update accounts for a substantial portion of the potential impacts on agricultural resources, which would be cumulatively considerable given the limited availability of agricultural lands within the Urban Area and particularly within the South Coast. Therefore, cumulative impacts to agricultural resources associated with the proposed Project would be *significant and unavoidable*.

3.2.4.4 Proposed Mitigation

No mitigation measures are feasible.

3.2.4.5 Secondary Impacts

No mitigation measures are feasible to reduce Project impacts. Therefore, no direct secondary impacts would occur.

3.2.4.6 Residual Impacts

Impact AG-1. The project would potentially convert sites that are existing agriculture lands that are designated Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance, and sites that are designated croplands to non-agricultural uses. Given that there is nowhere in the County that can regain the agricultural acreage lost to new housing developments, mitigation remains infeasible, and direct impacts from the loss of FMMP land would remain *significant and unavoidable*.

Impact AG-2. The Housing Element Update would enable the future conversion of agriculturally zoned lands, particularly within the South Patterson Agricultural Area and the San Marcos Agricultural Area, as well as the Carpinteria area that could potentially conflict with agricultural

zoning and impair agricultural productivity of the affecting lands or surrounding properties. The only way to fully avoid these impacts would be to eliminate sites currently zoned and used for agriculture, which would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets, as required under state law. As a result, impacts to agriculturally zoned lands under the proposed Project would remain *significant and unavoidable*.

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Section 3.3
Air Quality

3.3.1 Introduction

This section describes potential impacts related to air quality that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). This analysis addresses air pollutant emissions of sufficient nature and magnitude to cause significant impacts on the environment relative to public health and nuisance and implementation of the Santa Barbara County Clean Air Plan (CAP) and Ozone Plan.

Issues relating to the generation of greenhouse gas (GHG) emissions and contribution to the global effects of climate change are discussed in Section 3.7, *Greenhouse Gas Emissions.*

3.3.2 Environmental Setting

The California Air Resources Board (CARB) has divided California into 15 regional air basins that correspond to topographic features that influence regional air quality conditions. Each basin is further divided into Air Pollution Control Districts (APCD), which are responsible for managing and enforcing air quality regulations within their districts.

The Project area includes the unincorporated area of Santa Barbara County, which is located in the South Central Coast Air Basin (SCCAB). SCCAB comprises three air districts: San Luis Obispo County APCD, Santa Barbara County Air Pollution Control District (SBCAPCD), and Ventura County APCD. The Project area, which includes the five Housing Market Areas (HMAs; Lompoc Valley, Santa Maria Valley, Santa Ynez Valley, Cuyama Valley, and South Coast), is within the jurisdiction of SBCAPCD.

3.3.2.1 Topography and Meteorology

The county's air quality is influenced by both local topography and meteorological conditions. Meteorological and topographical influences that affect air quality in the Project area include the semi-permanent high-pressure cell that lies off the Pacific Coast, which leads to limited rainfall (approximately 16 inches per year), warm dry summers, and relatively cold dry winters. Temperatures in the winter range from an average low of 33°F at night to an average high of 55 degrees Fahrenheit (°F) during the day and in the summertime the daytime highs range in the 70s and 80s with lows ranging in the 50s and 60s. Nighttime average minimum temperatures are 50°F to 55°F over most of the county (County of Santa Barbara 2021). Most of the total annual precipitation in the county occurs during migratory storms. Precipitation occurs primarily in the winter, with 90 percent of the annual precipitation occurring between November and April. Annual precipitation averages are as low as six inches at some inland measuring stations, and as high as 30 inches in some areas of the coast. Summer months are generally quite dry, with thundershowers providing occasional rainfall. Large fluctuations in annual rainfall are common, which is typical for regions that receive small amounts of precipitation. Precipitation inland varies considerably as a function of distance from the coast, elevation, and topography (County of Santa Barbara 2021).

Temperature inversion conditions are common in the county and can affect the mixing and dispersion of pollutants. Temperature inversions result when cool, stable air lies below warmer air aloft. Inversions also tend to confine horizontal flow through passes and valleys that are below the inversion height. Surface temperature inversions (0 to 500 feet) are most frequent during the winter, and subsidence inversions (1,000 to 2,000 feet) are most frequent during the summer. Inversions increase temperature with height and are directly related to the stability of the atmosphere. Inversions act as a cap to the pollutants that are emitted below or within them, and ozone (O_3) concentrations are often higher directly below the base of elevated inversions than they are at the Earth's surface. For this reason, elevated monitoring sites will occasionally record higher O_3 concentrations than sites at lower elevations. Generally, the lower the inversion base height and the greater the rate of temperature increase from the base to the top, the more pronounced effect the inversion will have on inhibiting vertical dispersion.

Santa Ana winds are also a frequent occurrence in the county and are an important factor in air quality conditions. Santa Ana winds are northeasterly winds that occur primarily during fall and winter, but occasionally in spring. These are warm, dry winds that blow from the high inland desert and descend the slopes of a mountain range. Wind speeds associated with the Santa Ana winds are generally 15 to 20 miles per hour (mph), though wind speeds can sometimes exceed 60 mph. During Santa Ana conditions, air pollutants emitted within the county are moved out to sea. These pollutants can then be moved back onshore into the county in what is called a "post-Santa Ana condition."

Measurements of surface wind speed and direction are made at numerous airports and air quality monitoring stations throughout the county. The air quality monitoring stations that are equipped to measure wind speed and direction are described in Section 3.3.2.3, *Ambient Air Monitoring*. Poor air quality is usually associated with air stagnation (i.e., periods of high stability and restricted air movement). Therefore, it is reasonable to expect a higher frequency of air pollution events in the southern portion of the county where light winds and unique climactic conditions that affect air quality are more common (i.e., inversions, Santa Ana winds), as opposed to the northern part where the prevailing winds are usually strong and persistent.

3.3.2.2 Sensitive Receptors

Infants and children, elderly persons, individuals with pre-existing health problems, those who are close to the emissions source, or those who are exposed to air pollutants for longer periods are considered more sensitive to air pollutants than others. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because children, seniors, and people with some health issues are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential land uses are considered sensitive to poor air quality because people in residential areas are often at home for extended periods and are therefore subject to extended exposure to the type of air quality present at the residence. Recreational land uses offer individuals a location to exercise and are therefore considered moderately sensitive to air pollution. Vigorous exercise places a high demand on the human respiratory function and poor air quality could add potentially detrimental stresses to the respiratory function. Sensitive receptors in the Project area include residences, parks, hospitals, long-term care facilities, daycare centers (including public and private childcare centers, and worksites with onsite childcare facilities), and schools adjacent to potential housing sites. Some examples of specific sensitive receptors located in close proximity to housing sites include, but are not limited to, Dos Pueblos High School located south of Rezone Site No. 11 (Glen Annie) and El Camino Elementary

School located near Rezone Site Nos. 8 (San Marcos Growers 1), 9 (San Marcos Growers 2), 10 (McCloskey Leland), and 17 (Montessori), and Pending Project No. 42 (Tatum).

3.3.2.3 Common Air Pollutants

Air pollution emissions within the county are generated from several stationary, mobile, and natural sources – from large power plants and manufacturing facilities to residential water heaters and consumer products. Stationary sources can be divided into two major subcategories: 1) point sources; and 2) area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions in a region. Examples of area sources include residential and commercial water heaters, landscaping (e.g., lawnmowers), agricultural operations, landfills, and consumer products such as barbecue lighter fluid, hair spray, etc. Mobile sources are transportation-related emissions, including vehicles, aircraft, trains, and heavy construction equipment. Within the SCCAB, the primary source of emissions may vary depending on the pollutant.

The federal and state governments have identified criteria pollutants and a host of air toxics that have substantial adverse effects on human health and the environment in concentrations, and established air quality standards to control those concentrations through the Federal Clean Air Act (CAA) and the California Clean Air Act (CCAA). The criteria pollutants for which federal and state standards have been promulgated and which are most relevant to air quality planning and regulation in the SCCAB include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), reactive organic compounds (ROCs), volatile organic compounds (VOCs), sulfur dioxide (SO_2), and lead (Pb). In addition, there are additional toxic air contaminants (TACs) that are of concern in the SCCAB (Section 3.3.2.4, *Toxic Air Contaminants*). The following is a general description of the physical and health effects of these governmentally regulated air pollutants.

Ozone (O_3). O_3 occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (i.e., the "good" O_3) layer extends upward from about 10 to 30 miles and protects life on Earth from the Sun's harmful ultraviolet rays (UV-B). "Bad" O_3 is a photochemical pollutant and is formed from complex chemical reactions involving VOCs, nitrogen oxides (NO_x), and sunlight; therefore, VOCs and NO_x are O_3 precursors. VOCs and NO_x are emitted from various sources throughout the county. Significant O_3 formation generally requires an adequate amount of precursors in the atmosphere and several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

Many respiratory ailments, as well as cardiovascular disease, are aggravated by exposure to high ozone levels. O_3 also damages natural ecosystems (e.g., forests and foothill plant communities) and damages crops and some human-made materials (e.g., rubber, paint, and plastics). Societal costs from ozone damage include increased healthcare costs, the loss of human and animal life, accelerated replacement of industrial equipment, and reduced crop yields.

Within the SCCAB, the primary source of O_3 and O_3 precursor emissions comes from marine shipping (42 percent), followed by on-road and other mobile emissions (30 percent), area sources (14 percent), and stationary sources (14 percent) (SBCAPCD 2023a).

Carbon Monoxide (CO). CO is a colorless, odorless, relatively inert gas. It is a trace constituent in the unpolluted troposphere and is produced by both natural processes and human activities. In remote areas far from human habitation, CO occurs in the atmosphere at an average background concentration of 0.04 parts per million (ppm), primarily as a result of natural processes such as forest fires and the oxidation of methane. Global atmospheric mixing of CO from urban and industrial sources creates higher background concentrations (up to 0.20 ppm) near urban areas. The major source of CO in urban areas is incomplete combustion of carbon-containing fuels, mainly gasoline.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin. Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Within the SCCAB, the primary source of CO emissions comes from on-road and other mobile emissions (80 percent), area sources (11 percent), stationary sources (5 percent), and marine shipping (4 percent) (SBCAPCD 2023a).

Nitrogen Dioxide (NO_2). NO_x comprises a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (often reported as total nitrogen oxides, NO_x) is a reddish-brown gas that can cause breathing difficulties at high levels. It is formed from nitrogen (N_2) and oxygen (O_2) under conditions of high temperature and pressure which are generally present during the combustion of fuels (e.g., motor vehicles); nitric oxide (NO) reacts rapidly with the oxygen in air to form NO_2. The two gases, NO and NO_2, are referred to collectively as NO_x. In the presence of sunlight, atmospheric NO_2 reacts and splits to form a NO molecule and an oxygen atom. The oxygen atom can react further to form O_3, via a complex series of chemical reactions involving hydrocarbons.

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO_2 at levels found in homes with gas stoves. In healthy subjects, an increase in resistance to airflow and airway contraction is observed after short-term exposure to NO_2. Larger decreases in lung functions are observed in individuals with asthma and/or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. More recent studies have found associations between NO_2 exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms, and emergency room asthma visits.

Within the SCCAB, the primary source of NO_x emissions comes from marine shipping (66 percent) on-road and other mobile emissions (26 percent), stationary sources (7 percent), and area sources (1 percent) (SBCAPCD 2023a).

Inhalable Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or 10 one-millionths of a meter. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate the lungs and can potentially damage the respiratory tract.

Respirable particles (i.e., particles less than 10 microns in diameter, denoted as PM_{10}) can accumulate in the respiratory system and aggravate health problems such as asthma, bronchitis, and other lung diseases. Children, the elderly, exercising adults, and those suffering from asthma are especially vulnerable to adverse health effects of PM.

Within the SCCAB, the primary source of PM_{10} emissions comes from construction activities (38 percent), fugitive dust from roadways (27 percent), agricultural operations (12 percent), on-road and other mobile emissions (7 percent), residential fuel consumption (6 percent), marine shipping (3 percent), stationary sources (3 percent), and other sources (4 percent) (SBCAPCD 2023a).

Fine Inhalable Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to fine particulate matter (i.e., particulate matter 2.5 microns in diameter or less), both Federal and State $PM_{2.5}$ standards have been created. Emissions of $PM_{2.5}$ result from fuel combustion (e.g., motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur dioxide (SO_2), NO_x, and VOCs.

Particulate matter primarily affects infants, children, the elderly, and those with pre-existing cardiopulmonary disease. A consistent correlation between $PM_{2.5}$ levels and an increase in mortality rates, respiratory infections, the number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the U.S. and various areas around the world. Studies have reported an association between long-term exposure to air pollution dominated by $PM_{2.5}$ and increased mortality, reduction in lifespan, and increased mortality from lung cancer.

Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions, school and kindergarten absences, a decrease in respiratory function in normal children, and increased medication use in children and adults with asthma. Studies have also shown lung function growth in children is reduced with long-term exposure to PM. In addition to children, the elderly and people with pre-existing respiratory and/or cardiovascular disease appear to be more susceptible to the effects of PM_{10} and $PM_{2.5}$.

Within the SCCAB, the primary source of $PM_{2.5}$ emissions comes from residential fuel consumption (21 percent), on-road and other mobile emissions (17 percent), construction activities (14 percent), fugitive dust from roadways (12 percent), marine shipping (9 percent), agricultural operations (7 percent), stationary sources (6 percent), and other sources (14 percent) (SBCAPCD 2023a).

Reactive Organic Compounds (ROCs) and Volatile Organic Compounds (VOCs). ROCs and VOCs are organic gases that are formed solely of hydrogen and carbon. ROCs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation). These gases contribute to the formation of tropospheric ozone and smog and can cause adverse health

effects in high concentrations, particularly indoors. These include eye, nose, and throat irritation, headaches, loss of coordination, nausea, and even severe damage to the liver, kidney, and central nervous system.

Sulfur Dioxide (SO_2). SO_2 is a colorless gas with a sharp odor. It reacts in air to form sulfuric acid, which contributes to acid precipitation, and sulfates, which are components of particulate matter. The main sources of SO_2 include coal and oil used in power plants and industries. Exposure for a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics. All asthmatics are sensitive to the effects of SO_2. In asthmatics, an increase in resistance to airflow, as well as a reduction in breathing capacity leading to severe breathing difficulties, is observed after acute higher exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses, even after exposure to higher concentrations of SO_2.

Within the SCCAB, the primary source of SO_2 emissions comes from marine shipping (74 percent), stationary sources (16 percent), on-road and other mobile emissions (7 percent), and area sources (3 percent) (SBCAPCD 2023a).

Lead (Pb). Pb in the atmosphere is present as a mixture of several lead compounds. Leaded gasoline and lead smelters have been the main sources of lead emitted into the air. Due to the phasing out of leaded gasoline, there was a dramatic reduction in atmospheric Pb over the past three decades. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death. There is no evidence to suggest that there are direct effects of Pb on the respiratory system.

3.3.2.4 Toxic Air Contaminants

Toxic air contaminants (TACs) are defined in Section 39655 of the California Health and Safety Code as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness or may pose a present or potential hazard to human health. In addition, substances that have been listed as federal hazardous air pollutants (HAPs) pursuant to Section 7412 of Title 42 of the U.S. Code are TACs under the air toxics program pursuant to Section 39657(b) of the California Health and Safety Code. Health impacts include an increased risk of cancer due to continual inhalation of TACs. Most of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (i.e., diesel particulate matter [DPM]). Based on estimated ambient statewide DPM levels in 2012, DPM is believed to be responsible for approximately 70 percent of California's estimated known cancer risk attributable to TACs. According to CARB, DPM exposure contributes to numerous health impacts, including increased hospital admissions for heart disease, respiratory failure, and premature death (CARB 2023b). Studies have also shown that approximately 22 percent of known cancer risk is due to other TACs associated with mobile sources – including benzene, butadiene, and formaldehyde – and approximately 10 percent of the risk is attributed to stationary sources (including industries and other certain businesses, such as dry cleaners and chrome plating operations) (South Coast Air Quality Management District [SCAQMD] 2015).

CARB indicates that one of the highest public health priorities is the reduction of DPM generated by vehicles on California's freeways and highways, as it is one of the primary TACs with the most direct

and common implications for respiratory health problems. Per CARB criteria, heavily traveled roadways where annual average daily trips (AADT) exceed 100,000 can be sources of particulate emissions, particularly from diesel-fueled engines such as those associated with heavy haul trucks and other heavy construction equipment. CARB's Air Quality and Land Use Handbook: A Community Health Perspective (2005) makes specific recommendations to consider existing sensitive uses when locating new TAC-emitting facilities or consider TAC-emitting sources when siting sensitive receptors. CARB recommends the following buffer distances be observed when locating these types of TAC emitters or sensitive land uses:

- Freeways or major roadways – 500 feet
- Dry cleaners – 500 feet
- Auto body repair services – 500 feet
- Gasoline dispensing stations with an annual throughput of less than 3.6 million gallons – 50 feet; gasoline dispensing stations with an annual throughput at or above 3.6 million gallons – 300 feet; and
- Gasoline dispensing stations with an annual throughput at or above 3.6 million gallons – 300 feet.

In Santa Barbara County, U.S. Highway 101 is the only roadway considered a "high-volume roadway," defined as a roadway that has average daily traffic above 100,000 vehicles in an urban area or 50,000 vehicles in a rural area (SBCAPCD 2017a). In 2021, based on the California Department of Transportation (Caltrans) Traffic Census Program data, U.S. Highway 101 in unincorporated areas carried more than 100,000 AADT at its intersection with State Route (SR) 154, El Sueno Road, Turnpike Road, and SR 217 in the Eastern Goleta Valley on the South Coast (Caltrans 2021).

3.3.2.5 Ambient Air Monitoring

The SBCAPCD is responsible for monitoring air quality in Santa Barbara County within SCCAB to determine whether pollutant concentrations meet federal and state air quality standards. The SBCAPCD has 12 air monitoring stations in the county. Monitoring stations measure several different variables, including wind direction, wind speed, outdoor temperature, relative humidity, barometric pressure, solar radiation total hydrocarbons, O_3, NO_x, CO, SO_2, hydrogen sulfide (H_2S), $PM_{2.5}$, and PM_{10}. The stations are categorized as Industrial Monitoring Stations (IMS) and State and Local Air Monitoring Stations (SLAMS). IMS stations are used to determine baseline air quality and the impacts of specific operations. A SLAMS measures urban and regional air quality. Table 3.3-1 identifies and describes the monitoring stations found in the county. Figure 3.3-1 shows the locations of air quality monitoring stations throughout the county (SBCAPCD 2022b).

Figure 3.3-1. Air Quality Monitoring Station Locations



Table 3.3-1. Santa Barbara County Air Quality Monitoring Stations

	Station Names	Type	Monitoring
1	Carpinteria	Industrial/ SLAMS[1]	O_3, NO_2, Wind Speed, Wind Direction, Ambient Temperature
2	Goleta	SLAMS	O_3, PM_{10}, $PM_{2.5}$, Wind Speed, Wind Direction, Ambient Temperature
3	Las Flores Canyon	Industrial/ SLAMS[1]	O_3, NO_2, SO_2, CO, Total Hydrocarbons, PM_{10}, Wind Speed, Wind Direction, Ambient Temperature
4	Las Flores Canyon Odor	Industrial	H_2S, Wind Speed, Wind Direction, Ambient Temperature
5	Lompoc – H Street	SLAMS	O_3, NO_2, SO_2, CO, PM_{10}, $PM_{2.5}$, Wind Speed, Wind Direction, Ambient Temperature
6	Lompoc HS&P (North)	Industrial	O_3, NO_2, SO_2, Total Hydrocarbons, Wind Speed, Wind Direction, Ambient Temperature
7	Lompoc Odor	Industrial	H_2S, Total Reduced Sulfur, Wind Speed, Wind Direction, Ambient Temperature
8	Paradise Road	Industrial/ SLAMS[1]	O_3, NO_2, Wind Speed, Wind Direction, Ambient Temperature
9	Santa Barbara	SLAMS	O_3, PM_{10}, $PM_{2.5}$, Wind Speed, Wind Direction, Ambient Temperature
10	Santa Maria	SLAMS	O_3, NO_2, CO, PM_{10}, $PM_{2.5}$, Wind Speed, Wind Direction, Ambient Temperature

Table 3.3-1. Santa Barbara County Air Quality Monitoring Stations (Continued)

	Station Names	Type	Monitoring
11	Santa Ynez Airport	SLAMS	O_3
12	West Campus (University of California, Santa Barbara)	Industrial	SO_2, THC, H_2S, TRS, Wind Direction, Wind Speed

Notes:
[1] Ozone monitors at these locations are SLAMS; other monitors are industrial.
Source: SBCAPCD 2022b.

Table 3.3-2 combines the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for relevant air pollutants and provides a summary of ambient air quality measured within the county for the years 2018 to 2021. Since 2018, exceedances have occurred for the Federal and State O_3 standards, the State 24-hour PM_{10} standard, and the Federal 24-hour $PM_{2.5}$ standard. The Federal and State standards for CO, NO_2, and SO_2, and the Federal standard for PM_{10} were not exceeded from 2018 through 2021 (CARB 2023a; SBCAPCD 2021, 2020b, 2019, 2018).

Table 3.3-2. Ambient Air Quality Standards for Criteria Pollutants in the SCCAB

Pollutant/Standard	Number of Days Threshold Was Exceeded & Maximum Levels During Violations			
	2018	2019	2020	2021
Ozone				
State 1-Hour > 0.09 ppm	0 days	0 days	4 days	0 days
State 8-Hour > 0.07 ppm	0 days	1 days	6 days	1 days
Federal 8-Hour > 0.07 ppm	0 days	1 days	6 days	1 days
Max. 1-Hour Conc. (ppm)	0.084	0.086	0.105	0.082
Max. 8-Hour Conc. (ppm)	0.070	0.072	0.086	0.071
Carbon Monoxide (CO)				
State 8-Hour > 9.0 ppm	0 days	0 days	0 days	0 days
Federal 8-Hour > 9.0 ppm	0 days	0 days	0 days	0 days
Max. 1-Hour Conc. (ppm)	3.4	4.0	2.5	4.5
Inhalable Particulates (PM_{10})				
State 24-Hour > 50 µg/m^3	27 days	17 days	33 days	1 days
Federal 24-Hour > 150 µg/m^3	0 days	0 days	0 days	0 days
Max. 24-Hour Conc. (µg/m^3)	123.1	132.5	113.3	73.1
Annual Average (µg/m^3)	26.0	23.0	25.9	22.8
Fine Inhalable Particulates ($PM_{2.5}$)				
Federal 24-Hour > 35 µg/m^3	2 days	0 days	10 days	0 days
Max. 24-Hour Conc. (µg/m^3)	40.6	26.3	85.6	20.2
Annual Average (µg/m^3)	8.5	6.8	9.2	6.6

Table 3.3-2. Ambient Air Quality Standards for Criteria Pollutants in the SCCAB (Continued)

Pollutant/Standard	Number of Days Threshold Was Exceeded & Maximum Levels During Violations			
	2018	2019	2020	2021
Nitrogen Dioxide (NO_2)				
State 1-Hour > 0.18 ppm	0 days	0 days	0 days	0 days
Federal 1-Hour > 0.10 ppm	0 days	0 days	0 days	0 days
Max. 1-Hour Conc. (ppm)	0.040	0.034	0.036	0.062
Sulfur Dioxide (SO_2)				
State 1-Hour > 0.25 ppm	0 days	0 days	0 days	0 days
State 24-Hour > 0.14 ppm	0 days	0 days	0 days	0 days
State 24-Hour > 0.04 ppm	0 days	0 days	0 days	0 days
Max 1-Hour Conc. (ppm)	0.003	0.004	0.026	0.011

Source: CARB 2023a; SBCAPCD 2021, 2020b, 2019, 2018.

3.3.2.6 Odors

Odors are not regulated under the Federal CAA or the CCAA (Section 3.3.3, *Regulatory Setting*); however, they are considered nuisances under the California Environmental Quality Act (CEQA). Odors can potentially affect human health in several ways. Odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Additionally, VOCs can cause odors that irritate (e.g., by compromising the immune system). Common sources of odors and nuisance emissions include wastewater treatment plants, landfills, composting facilities, petroleum refineries, and chemical manufacturing facilities.

3.3.3 Regulatory Setting

Federal, state, and local regulations have been enacted to address air quality in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.3.3.1 Federal and State: Ambient Air Quality Standards

Both the federal and state governments have established ambient air quality standards (AAQS) for several different pollutants, a summary of which is provided in Table 3.3-2. For some pollutants, separate standards have been set for different periods. Most standards have been set to protect public health. However, for other pollutants, standards have been based on some other value (e.g., protection of crops, protection of materials, or avoidance of nuisance conditions).

Santa Barbara County is designated nonattainment status for the State 1-hour and 8-hour O_3 standard, as well as the State annual arithmetic mean and 24-hour PM_{10} standard. While the county is currently designated nonattainment status for the State 1-hour O_3 standard, it should be noted that the county recorded 0 days of exceedance of this standard in 2021 (SBCAPCD 2021). Until recently, the county was also designated nonattainment status for the State annual arithmetic mean and 24-hour $PM_{2.5}$ standard. However, in February 2022, CARB changed the county's designation status from "unclassified" to "attainment" for State $PM_{2.5}$ standards. The change became effective on October 10,

2022 (SBCAPCD 2022c). The county is designated as attainment or unclassified/attainment status for federal and state standards for all other pollutants (Table 3.3-3). identifies the attainment and nonattainment pollutant designations for the county.

Table 3.3-3. Santa Barbara County Attainment/Nonattainment Classification Summary 2022

Pollutant	Averaging Time	California		Federal	
		Standard	Attainment Status	Primary Standard	Attainment Status[1]
Ozone (O_3)	1-hour	0.09 ppm	N	Revoked	--
	8-hour[1]	0.07 ppm	N	0.07 ppm	U/A[1]
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm	A	0.1 ppm	U/A
	Annual Arithmetic Mean	0.03 ppm	A	0.053 ppm	U/A
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm	A	0.075 ppm	U/A
	24-hour	0.04 ppm	A	Revoked	--
Carbon Monoxide (CO)	1-hour	20 ppm	A	35 ppm	A
	8-hour	9.0 ppm	A	9.0 ppm	A
Fine Particulate Matter ($PM_{2.5}$)	24-hour[2]	--	--	35 $\mu g/m^3$ [2]	U/A
	Annual Arithmetic Mean	12 $\mu g/m^3$	A	12.0 $\mu g/m^3$	U/A
Particulate Matter (PM_{10})	24-hour[2]	50 $\mu g/m^3$	N	150 $\mu g/m^3$	U
	Annual Arithmetic Mean	20 $\mu g/m^3$	N	Revoked	--
Lead	30-day	1.5 $\mu g/m^3$	A	--	--
	Rolling 3-month	--	--	0.15 $\mu g/m^3$	U
Sulfates	24-hour	25 $\mu g/m^3$	A	--	--
Hydrogen Sulfide	1-hour	0.03 ppm	A	--	--
Vinyl Chloride (chloroethene)	24-hour	0.01 ppm	--	--	--
Visibility Reducing Particles[2]	8-hour	N/A[5]	U	--	--

Notes:
A=Attainment; N=Nonattainment; U=Unclassified; U/A=Unclassifiable/Attainment; -- = No Standard
mg/m^3=milligrams per cubic meter
ppm=parts per million
$\mu g/m^3$=micrograms per cubic meter

[1] U.S. Environmental Protection Agency (USEPA) strengthened the 8-hour O_3 standard from the 1997 level of 0.08 ppm to 0.075 ppm on May 27, 2008, but delayed implementation of the standard. Designations for the 2008 standard were finalized on April 30, 2012. Later, on October 1, 2015, the national 8-hour O_3 primarily and secondary standards were lowered from 0.075 to 0.070 ppm.

[2] USEPA strengthened the 24-hour fine particle standard from the 1997 level of 65 $\mu g/m^3$ to 35 $\mu g/m^3$ on September 21, 2006. The annual standard was strengthened from 15 to 12.0 $\mu g/m^3$ on January 15, 2013.

[3] The State NO_2 ambient air quality standard was amended on February 22, 2007, to lower the 1-hour standard to 0.18 ppm and establish a new annual standard of 0.030 ppm. On January 22, 2010, the USEPA set a new 1-hour NO_2 standard of 100 parts per billion (ppb). They also retained the annual NO_2 standard of 53 ppb.

[4] USEPA has not yet made final designations on attainment status. For more information, see USEPA's website.

[5] Statewide Visibility Reducing Particles Standard (except Lake Tahoe Air Basin): Particles in sufficient amounts to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Source: SBCAPCD 2022a, 2023.

3.3.3.2 Federal

Federal Clean Air Act

The Federal CAA was passed in 1963 and amended in 1990 and was the first comprehensive federal law to regulate air emissions from stationary and mobile sources. Among other things, the law authorizes the USEPA to establish NAAQS for pollutants considered harmful to public health and the environment, including the six criteria pollutants: CO, Pb, NO_2, O_3, $PM_{2.5}$, PM_{10}, and SO_2. The NAAQS help to ensure basic health and environmental protection from air pollution. The NAAQS currently in effect for each pollutant, as well as the attainment status of the SCCAB, are shown in Table 3.3-2. The Federal CAA also gives the USEPA the authority to limit emissions of air pollutants coming from sources like chemical plants, utilities, and steel mills.

In 1990, the U.S. Congress adopted the Federal Clean Air Act Amendments (CAAA), which updated the nation's air pollution control program. The Federal CAAA established several requirements, including new deadlines for achieving federal clean air standards.

The USEPA is the federal agency charged with administering the Federal CAAA and other air quality-related legislation. As a regulatory agency, USEPA's principal functions include setting NAAQS; establishing minimum national emission limits for major sources of pollution; and promulgating regulations.

The Federal CAAA requires USEPA to approve state implementation plans (SIPs) to meet and/or maintain the NAAQS. California's SIP is comprised of plans developed at the regional or local level.

3.3.3.3 State

California Clean Air Act

The CCAA was enacted in 1988 (California Health & Safety Code Section 39000 et seq.). California also has ambient air quality standards (i.e., CAAQS), which predate USEPA's formation in 1970 and the original NAAQS for pollutants considered harmful to public health and the environment, including the six criteria pollutants, as well as sulfates, hydrogen sulfide, vinyl chloride (chloroethene), and visibility reducing particles. The CAAQS currently in effect for each pollutant, as well as the attainment status of the SCCAB, are shown in Table 3.3-2. In 1959, California enacted legislation requiring the California Department of Public Health (CDPH) to establish air quality standards and necessary controls for motor vehicle emissions. The CCAA requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. California law continues to mandate CAAQS, although attainment of the NAAQS has precedence over attainment of the CAAQS. The CAAQS includes more stringent standards than the NAAQS. CARB ensures the implementation of the CCAA and responds to the Federal CAA. CARB is responsible for the control of vehicle emission sources, while the local air district is responsible for enforcing standards and regulating stationary sources.

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP.

CARB is responsible for the control of vehicle emission sources, while the local air district is responsible for enforcing standards and regulating stationary sources.

California Air Toxics "Hot Spots" Information and Assessment Act

The Air Toxic "Hot Spots" Information and Assessment Act identifies TAC hot spots where emissions from specific stationary source facilities may expose individuals to an elevated risk of adverse health effects. It requires that a business or other establishment identified as a significant source of toxic emissions provide the affected population with information about the health risks posed by the emissions. Health Risk Assessments (HRAs) would identify the hazard or hazardous material, assess the amount, duration, and pattern of exposure to the hazard or hazardous material, assess the amount it would take to cause negative health effects, and characterize the risk to the general population and sensitive receptors from the hazard or hazardous material. The California Office of Environmental Health Hazard Assessment provides A Guide to Health Risk Assessment and The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (2015) to aid California projects' compliance with the Air Toxic "Hot Spots" Information and Assessment Act. In Santa Barbara County, SBCAPCD implements and enforces the Air Toxic "Hot Spots" Information and Assessment Act. Over time, SBCAPCD has worked to reduce the number of significant risk facilities and there are no significant risk facilities in the county (SBCAPCD 2023c).

California Building Code

California Code of Regulations, Title 24, is known as the CBC, which establishes the regulations for building construction and system design and installation to achieve energy efficiency and preserve outdoor and indoor environmental quality. The CBC includes the following subparts which are most applicable to development under the proposed Project.

California Code of Regulations, Title 24, Part 6 comprises the California Energy Code, which was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to increase the baseline energy efficiency requirements. The Title 24 standards were updated in 2021 and became effective on January 1, 2023. The updated standards apply to all buildings for which an applicable building permit is submitted on or after January 1, 2023, and established new standards for electric-ready requirements, expanded solar PV and battery storage, and strengthened ventilation standards for improved air quality. The Title 24 standards also include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards are in alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 National Standards. Although it was not originally intended to reduce criteria pollutant or TAC emissions, electricity production by fossil fuels results in ozone precursor emissions and energy-efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased criteria pollutant and TAC emissions from residential and non-residential buildings.

California Code of Regulations, Title 24, Part 11 comprises CALGreen, which establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of VOC-emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's impact on the environment and promote a more sustainable design.

3.3.3.4 Local

Santa Barbara County Air Pollution Control District

SBCAPCD monitors air quality and regulates stationary emission sources in the county. As a responsible agency under CEQA, SBCAPCD reviews and approves environmental documents prepared by other lead agencies or jurisdictions to reduce or avoid impacts on air quality and to ensure that the lead agency's environmental document is adequate to fulfill CEQA requirements. As a concerned agency, the SBCAPCD comments on environmental documents and suggests mitigation measures to reduce air quality impacts. SBCAPCD has also established rules applicable to certain activities within the county addressing specific topics. Rules that may apply to the proposed Project include:

- Rule 303 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material in violation of Section 41700 of the Health and Safety Code which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endanger the comfort, repose, health or safety or any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.
- Rule 345 – Control of Fugitive Dust from Construction and Demolition Activities. This rule applies to any activity associated with the construction or demolition of a structure. Activities subject to this regulation are also subject to Rule 302 (Visible Emissions) and Rule 303 (Nuisance). This rule includes specific requirements and standards applicable to construction or demolition activities to reduce and prevent visible emissions.

Santa Barbara County Clean Air Plan and Ozone Plan

The Federal CAAA of 1990 and the CCAA of 1988 mandate the preparation of plans for the attainment of air quality standards that provide an overview of air quality and sources of air pollution and identify pollution-control measures needed to meet federal and state air quality standards. The SBCAPCD and the Santa Barbara County Association of Governments (SBCAG) are responsible for formulating and implementing air quality attainment plans for Santa Barbara County.

To comply with these regulations, the County prepared an Air Quality Attainment Plan (AQAP) in 1979. The 1979 AQAP demonstrated that the area could not attain the Federal O_3 standard by the required attainment date of 1982 despite the implementation of all reasonably available control techniques on stationary sources. The Federal CAAA requires that air quality plans include "...such other measures as may be necessary to insure attainment and maintenance of such primary or secondary standards (for which the area is in a nonattainment status), including, but not limited to transportation controls..." To achieve this directive, land use control measures were and have been included in the AQAP to aid in future air quality planning efforts. Subsequent AQAPs have been issued in 1989 and 1991.

In 1994, the SBCAPCD began preparing a CAP to triennially update the AQAP. The CAP provides an overview of the regional air quality and sources of air pollution and identifies the pollution-control measures needed to meet clean-air standards. The schedule for plan development is outlined by federal and state requirements and is influenced by regional air quality. CAPs affect the development of SBCAPCD rules and regulations and other programs. They also influence a range of activities outside the district including transportation planning, allocation of monies designated for air quality projects, and more (SBAPCD 2022a).

The SBCAPCD 2022 Ozone Plan is the most recent triennial update to the County AQAP required by the state to show how SBCAPCD plans to meet the state 8-hour O_3 standard. Note that past ozone plan updates addressed both the federal and state O_3 standards, but this plan addresses the state standards only because the SCCAB is designated "attainment" for the federal 8-hour O_3 standards. The 2022 Ozone Plan builds upon and updates the 2019 Ozone Plan and includes an inventory of O_3 precursor emissions in the county, the most prevalent of which are ROCs and NO_x. The 2022 Ozone Plan focuses on reducing O_3 precursor emissions by predicting vehicle activity trends and applying both stationary source emission control measures and transportation control measures, which reduce mobile-source emissions, the primary source of ROC and NO_x emissions in the county. The 2022 Ozone Plan satisfies both federal and state planning requirements and was adopted by the SBCAPCD Board in December 2022. CARB is in the process of redesignating the county from "nonattainment" to "nonattainment-transitional" for the State ozone standards (SBCAPCD 2022).

Santa Barbara County Comprehensive Plan, Land Use Element, Air Quality Supplement

Due to the exceedance of the federal ambient air quality standard for O_3, the Federal CAAA requires that air quality plans include "...such other measures as may be necessary to insure [sic] attainment and maintenance of such primary or secondary standards (for which the area is in a nonattainment status), including, but not limited to transportation controls..." Since the success of certain aspects of transportation planning is an integral part of land use planning, and since emission growth from population-related sources contributes to the overall emission growth in the county, land use control measures have been included in the Air Quality Supplement to the Land Use Element in the County's Comprehensive Plan. These land use measures aid in future air quality planning efforts and present a coordinated approach to integrating air quality planning techniques into the County's land use planning program. Such measures include the promotion of alternative transportation, directing new development within established urbanized areas, and restricting the development of auto-dependent facilities (County of Santa Barbara 2009).

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) is a report published every decade. The most recent version is the Connected 2050 RTP/SCS. The Connected 2050 RTP/SCS provides a collective vision for the region's future that balances transportation and housing needs with social, economic, and environmental goals. The plan helps guide future planning efforts and policy decisions that affect transportation, including its relationship with housing and land use that will reduce GHG emissions in our region. The Connected 2050 RTP/SCS provides recommendations to help cities and the County make important decisions about transportation, housing, and land-use. Connected 2050 RTP/SCS provides forward-looking recommendations for 2050 because many of our local government decisions will influence the region's long-term growth and development over the next 30 years. Fundamentally, this plan explores the region's land use and travel patterns, accounts for the demographic growth that will force new demands on both, and presents a vision for how they can work together to satisfy the goals important to the region while also meeting the State's GHG reduction targets.

Santa Barbara County Association of Governments (SBCAG) 2050 Regional Growth Forecast

The purpose of the Regional Growth Forecast is to provide consistent long-range population, job, and household forecasts for use in long-range regional planning to the year 2050 for the County, its major economic and demographic regions, and its eight incorporated cities. The Regional Growth Forecast is a requirement of the SBCAG RTP/SCS. The forecast is adopted by the SBCAG board and used in a variety of applications such as local General Plans, public service district forecasts, business development, transportation forecasts, and air quality planning. This forecast is based on the land use capacity of local general plans and takes input from all jurisdictions, the public, and the SBCAG board. The forecast is updated periodically as new demographic data, land use policies, and changes in growth assumptions warrant.

Santa Barbara County Grading Ordinance

Chapter 14 of the County Code is the Santa Barbara County Grading Code (Ord. No. 4766, 11-9-2010). The regulations, conditions, and provisions of this chapter constitute minimum standards and procedures necessary to protect and preserve life, limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, location, and maintenance of grading, drainage, erosion, sediment, and dust control when required by these regulations within the County. Under Chapter 14, all graded surfaces and materials, whether filled, excavated, transported, or stockpiled, shall be wetted, protected, or contained in such a manner as to prevent the generation of dust. Construction equipment and materials on the site shall be used in such a manner as to avoid creating a public nuisance. Roadways and graded areas on the site shall be surfaced or wetted sufficiently to prevent the generation of excessive dust at all times. However, such wetting shall not cause offsite runoff of sediment or pollutants.

3.3.4 Environmental Impact Analysis

This section discusses the potential air quality impacts associated with the proposed Project. Where there are potentially significant, mitigation measures are proposed and the residual impact after mitigation is determined.

3.3.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program Environmental Impact Report (EIR), implementation of the proposed Project may have a significant adverse impact on air quality if it would:

a. Conflict with or obstruct implementation of the applicable air quality plan.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard.

c. Expose sensitive receptors to substantial pollutant concentrations.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

County of Santa Barbara Environmental Thresholds and Guidelines

Based on Appendix G of the CEQA Guidelines, the County has developed two criteria for determining if a project will have a potentially significant adverse air quality impact. If the project meets either of the two following criteria, the impacts must be discussed and analyzed in detail and appropriate mitigation measures must be identified. Specifically, the County has determined that a significant adverse impact may occur when a project, individually or cumulatively, triggers any one of the following:

- Interferes with progress towards the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NO_x and ROC;
- Equals or exceeds the state or federal ambient air quality standards for any criteria pollutant (as determined by modeling);

The County also requires that cumulative air quality impacts and consistency with the policies and measures in the Air Quality Supplement of the Comprehensive Plan Land Use Element, other general plans, and the AQAP should be determined for all projects (i.e., whether the project exceeds the AQAP emission projections or growth assumptions). The County requires a discussion of the following issues as applicable to the project:

- Emissions which may affect sensitive receptors (e.g., children, elderly, or acutely ill);
- Toxic or hazardous air pollutants in amounts which may increase cancer risk for the affected population; or
- Odor or another air quality nuisance problem impacting a considerable number of people.

CEQA requires that the significance of a project's direct and indirect emissions be determined for both direct and indirect short-term (construction) and long-term (operational) impacts. To meet these CEQA requirements, the County's *Environmental Thresholds and Guidelines Manual* provides the following applicable thresholds/methodology for determining project impacts:

1. **Short-term/Construction Emissions:** Short-term air quality impacts generally occur during project construction (e.g., emissions from operation of equipment with internal combustion engines, fugitive dust from grading activities, application of paints). CEQA requires a discussion of the short-term impacts of a project in the environmental document. The reasoning for considering short-term impacts insignificant is provided below.

   No quantitative threshold has been established for short-term, construction-related PM_{10} (which is 50 percent of total dust). However, this impact should be discussed in all environmental documents for projects involving ground disturbance. Dust control measures are required under the County of Santa Barbara's Grading Ordinance for most projects. Some projects have the potential for construction-related dust to cause a nuisance. Also, Santa Barbara County violates the state standard for PM_{10}. Therefore, dust mitigation measures are required for all discretionary construction activities. The standard dust mitigation measures are based on policies in the 1979 AQAP and are listed in a separate implementation document, Air Quality Analysis for EIRs, available from the County Planning and Development Department (P&D).

The short-term thresholds for NO_x and ROC emissions from construction equipment were not established. Emissions of NO_x from construction equipment in the County are estimated at 1,000 tons per year of NO_x. When compared to the total NO_x emission inventory for the county of approximately 17,000 tons per year, construction emissions comprise approximately 6 percent of the 1990 county-wide emission inventory for NO_x (Santa Barbara County 1993 Rate-of Progress Plan). In general, this amount is considered insignificant.

2. **Long-term/Operational Emissions:** Long-term air quality impacts occur during project operation and include emissions from any equipment or process used in the project (e.g., residential water heaters, engines, boilers, operations using paints or solvents) and motor vehicle emissions associated with the project. These emissions must be summed to determine the significance of the project's long-term impact on air quality.

    a. **Ozone Precursors (NO_x and ROCs).** A proposed project will not have a significant air quality effect on the environment if the operation of the project will:

        - Emit (from all project sources, mobile and stationary), less than the daily trigger for offsets set in the SBCAPCD New Source Review Rule for any pollutant (55 lbs/day for NO_x and ROC, and 80 lbs/day for PM_{10}); and
        - Emit less than 25 lbs/day for NO_x or ROC from motor vehicle trips only; and
        - Not cause or contribute to a violation of any CAAQS or NAAQS (except ozone); and
        - Not exceed the SBCAPCD health risk public notification thresholds adopted by the SBCAPCD Board; and
        - Be consistent with the adopted federal and state Air Quality Plans.

    b. **Carbon Monoxide (CO).** A project will have a significant air quality impact if it causes, by adding to the existing background CO levels, a carbon monoxide "hot spot" where the California one-hour standard of 20 ppm CO is exceeded. This typically occurs at severely congested intersections.

        To determine whether a project would result in CO impacts, the County has established the following project screening criteria:

        - If a project contributes fewer than 800 peak-hour trips, then CO modeling is not required.
        - Projects contributing more than 800 peak hour trips to an existing congested intersection at a level of service (LOS) D or below, or will cause an intersection to reach LOS D or below, may be required to model for CO impacts. However, projects that will incorporate intersection modifications to ease traffic congestion, are not required to perform modeling to determine potential CO impacts.

3. **Cumulative Impacts.** Due to the county's non-attainment status for ozone and the regional nature of the pollutant, if a project's total emissions of the ozone precursors, NO_x or ROCs, exceed the long-term threshold, then the project's cumulative impacts will be considered significant. For projects that do not have significant ozone precursor emissions or localized pollutant impacts, emissions have been taken into account in the AQAP growth projections and therefore, cumulative impacts may be considered to be insignificant.

4. **Consistency with the AQAP and Other Planning Documents.** Consistency with local and regional plans, such as the AQAP, the Congestion Management Plan (CMP), and the RTP/SCS is required under CEQA. Consistency with the AQAP means that stationary and vehicle emissions

associated with the project are accounted for in the AQAP's emissions growth assumptions. The AQAP generally relies on the land use and population projections provided in SBCAG's Regional Growth Forecast. Further, consistency with the Air Quality Supplement of the County's Land Use Element must also be analyzed.

In addition to the County's thresholds described above in this section, the SBCAPCD has prepared the Environmental Review Guidelines for the Santa Barbara County Air Pollution Control District (2015), which also lists screening criteria for determining the significance of long-term operational emissions. A proposed project would not have a significant air quality effect on the environment if the operation of the project would:

- Emit (from all project sources, mobile and stationary) less than the daily trigger for offsets or Air Quality Impact Analysis set in the SBCAPCD New Source Review Rule, for any pollutant (240 pounds/day for ROCs and NO_x; and 80 pounds/day for PM_{10}. There is no daily operational threshold for CO; it is an attainment pollutant); and
- Emit less than 25 pounds per day of NO_x or ROCs (ROGs or VOCs) from motor vehicle trips only; and
- Not cause or contribute to a violation of any CAAQS or NAAQS (except O_3); and
- Not exceed the SBCAPCD health risk public notification threshold adopted by the SBCAPCD Board; and
- Be consistent with the adopted federal and state Air Quality Plans.

Similar to the County's above-described thresholds for short-term/construction emissions, the SBCAPCD does not currently have quantitative thresholds of significance in place for short-term or construction emissions; however, the SBCAPCD uses 25 tons per year for ROCs (ROGs or VOCs) or NO_x as a guideline for determining the significance of construction impacts. Further, to assist Lead Agencies with determining whether the thresholds for vehicle-related emissions from project operations might be exceeded, SBCAPCD has prepared a screening table that lists only the most common types of land uses and estimates the size of a specific project type that is expected to be less than the threshold of significance for NO_x and ROC emissions from vehicles. This screening table is presented in Attachment A of SBCAPCD's Scope and Content for Air Quality Sections in Environmental Documents (2022b). A summary of the screening criteria for land uses most applicable to the proposed Project is presented in Table 3.3-4 below.

Table 3.3-4. SBCAPCD Screening Table of Projects with Potentially Significant Emissions

Land Use Category	Project Description	Size of Projects Likely to Generate Approximately 22.5 lbs/day of ROG or NO_x
Housing		
Single-Family Housing	Detached housing with a density of 3 du/ac on individual lots	290 du
Apartments	One or two-story apartments with a density of 16 du/ac	400 du
Condominiums/Town-houses	Multifamily housing with a density of 16 du/ac	490 du
Mobile Home Park	A density of 7.9 du/ac	575 du
Retail		
Quality Restaurant	Full service, one hour or more turnover rate	300,000 sf
High-turnover Restaurant	Full service, less than one-hour turnover rate	18,000 sf
Hotel	Full service, restaurant, meeting rooms	340 rooms
Motel	Restaurant, parking	500 rooms
Strip Mall	A small strip shopping center that contains a variety of retail shops	64,000 sf
Supermarket	Food items, banking, bakeries, floral and photo centers	16,000 sf
24-hour Convenience Market	Convenience foods, no gasoline	3,300 sf
Commercial		
Medical Office Building	Medical, dental office	77,000 sf
General Office Building	Multiple tenants	180,000 sf
Bank (with Drive-Through)	Drive-in lands, may also have walk-in banking services	19,000 sf
Pharmacy/Drugstore (with Drive-Through)	Medications/drugs, personal care products, general merchandise, drive-through windows	29,000 sf

Notes:
du = dwelling units
du/ac – dwelling units per acre
Source: SBCAPCD 2022b.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential and mixed use development, are not known. As a result, the impact analysis provided below does not specifically evaluate individual impacts at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for

the lower- and moderate-income affordability levels. The programmatic analysis provided by this Program EIR analyzes potential air emissions associated with potential future residential and mixed use development enabled under the Housing Element Update. As detailed below, this assessment estimates two potential construction development scenarios that could be enabled under the Housing Element Update to provide context for whether the future development would result in significant construction emissions. This assessment also considers operational emissions related to land use and development enabled by the Housing Element Update. This analysis also considers whether the proposed Project would conflict with all applicable federal, state, and local air quality regulations and policies.

The information and analysis in this section are based on information from previous studies and EIRs prepared by the County or other local or regional agencies. These include the Agricultural Enterprise Ordinance Draft EIR, the 2030 Draft Climate Action Plan and Draft Program EIR, the 2021 Connected 2050 RTP/SCS EIR, as well as the County's CAP, Comprehensive Plan Land Use Element – Air Quality Supplement, and information from recent environmental documents prepared for the County. The discussion of air quality in the Project area is broadly derived from the above sources, as well as the SBCAPCD Ambient Air Monitoring Network and Air Quality Reports, the 2022 Ozone Plan, and the Environmental Review Guidelines for SBCAPCD. This section also utilizes data from the California Energy Commission (CEC) and the California Emissions Estimator Model (CalEEMod) Version 2020.4.0, consistent with the energy analysis in Section 3.6, *Energy,* and the GHG analysis in Section 3.7, *Greenhouse Gas Emissions.* A detailed discussion of the approach to analysis is presented below.

Conflicts with Applicable Air Quality Plan

Federal and state ambient air quality standards are designed to prevent the harmful effects of air pollutant emissions. These standards are continually updated based on evolving research, including research that relates air quality impacts with health effects. At the regional level, the 2022 Ozone Plan works to ensure that the SCCAB reaches and maintains attainment with State standards for ozone. Locally, EIRs evaluate a plan or project's consistency with applicable policies identified in the Ozone Plan intended to protect human health. As described above under the County's thresholds of significance for consistency with the AQAP and other planning documents, consistency with the regional air quality planning documents, including the AQAP and Air Quality Supplement of the Land Use Element means that stationary, area-wide, and mobile source emissions associated with the proposed Project are accounted for in the Ozone Plan's emissions growth assumptions, applicable control measures, and air emissions reduction policies which are directed at reducing O_3 precursor emissions and achieving attainment with State standards for ozone. These strategies are developed, in part, based on SBCAG's Regional Growth Forecast. Thus, projects that are consistent with the assumed growth projections and control strategies assumed in the development of the Ozone Plan would not conflict with or obstruct the implementation of the Ozone Plan, even if they exceed the SBCAPCD's numeric thresholds for criteria pollutants.

Cumulative Considerable Net Increase in Criteria Pollutants

CEQA Guidelines Section 15130 requires that an EIR discuss the cumulative impacts of a project when the project's incremental effects are cumulatively considerable. A "cumulative impact" is an impact that is created as a result of the combination of the proposed project together with other projects causing related impacts. "Cumulatively considerable" means that the incremental effects of the individual project are significant when viewed in connection with the effects of past projects, current projects, and probable future projects, which in this case includes growth within the county.

This analysis focuses on the air quality impacts that could occur from air pollutant emissions associated with the implementation of the proposed Project. Consistent with County and SBCAPCD guidance, this analysis evaluates the contribution of the Housing Element Update to cumulative air quality impacts by comparing estimated emissions against the SBCAPCD's thresholds of significance defined above, as described further below. As described in Chapter 2, *Project Description,* the Housing Element Update consists of a schedule of actions that the County is undertaking or intends to undertake to achieve the goals and policies for addressing the preservation, improvement, and development of housing countywide. As such, the Housing Element Update does not involve any proposals to implement site-specific improvements. However, the Program EIR considers the potential maximum density allowed for each site included in the sites inventory prepared for the Housing Element Update, which informs the total maximum potential buildout of the proposed Project for CEQA environmental review of a reasonably foreseeable worst-case scenario.

As discussed further below, emissions that would be generated from the development of maximum EIR buildout were estimated using CalEEMod Version 2020.4.0. Calculation details are provided in the CalEEMod worksheet results in Appendix C. Given the Housing Element Update does not propose any site-specific details for the construction or operation of future development, default values were assumed based on the proposed land use type and property size.

Construction Air Quality Impacts

The proposed Project is an update to the County's Housing Element, a planning and policy document that does not directly propose any new development that would produce air pollutant emissions or generate environmental impacts. However, as described in Chapter 2, *Project Description*, the Housing Element Update would facilitate or encourage residential and mixed use development in locations identified in the housing sites inventory, which would result in short-term construction air emissions. In many cases, housing projects enabled under the Housing Element Update would involve the development of existing vacant sites in the unincorporated area of the county consistent with the existing zoning designation of the property. Generally, the zoning of these sites permits only low-density residential development projects and single-family homes that would have limited construction-related or operational impacts. However, the Housing Element Update proposes a Potential Rezone Program that would involve the rezoning of existing vacant and non-vacant parcels to residential and mixed use zoning that would permit higher density of residential development than is currently allowed under existing zoning regulations, as well as several potential higher-density housing projects on vacant County-owned sites. As such, the Potential Rezone Program sites and County-owned sites would result in the greatest amount of construction emissions on a project-by-project basis and represent the most conservative scenario for determining the potential short-term, construction-related impacts of the proposed Project.

To provide a reasonable, worst-case analysis of potential construction-related impacts of the Housing Element Update, an estimate of hypothetical construction-related emissions that could result from the development of individual housing sites under the proposed Project was developed (Appendix C). Specifically, potential construction emissions were calculated using CalEEMod under two separate residential project scenarios that could reasonably occur as a result of Project implementation. Under this analysis, the maximum potential site buildout assumptions developed for two Potential Rezone Program sites were modeled in CalEEMod. The two sites selected for modeling include Rezone Site No. 1 (Giorgi) located on the South Coast and proposed to be rezoned DR-30/40, which could permit the development of up to 3,369 multifamily units on a 64.8-acre site, and Rezone Site No. 19 (Key Site 1) located in the Santa Maria Valley and proposed to be rezoned C-2 and MR-O, which could permit

development of up to 2,099 multifamily units and 364,000 square feet (sf) of ground floor commercial retail on a 24.71-acre site. These Potential Rezone Program sites represent the largest development sites that could be enabled under the proposed Project. To model these scenarios, site-specific characteristics, including the maximum potential buildout of each proposed land use/zoning district and parcel size, were input into CalEEMod. Specific assumptions developed for each scenario as modeled in CalEEMod are summarized in Table 3.3-5 below.

As described above, default values were utilized for all construction-related aspects not included in Tables 3.3-5 due to the absence of site-specific construction details. Due to Rezone Site No. 1 (Giorgi) being proposed for solely residential uses, land use assumptions for this site do not include any additional paved areas. It should also be noted that the CalEEMod construction emissions estimates do not account for construction procedures mandated by state law and local regulations, such as the California Code of Regulations Title 13, Division 3, Chapter 9, Article 4, Section 2423(b)(1), CARB construction equipment/vehicle idling restrictions, or adopted SBCAPCD rules. Further, the construction emissions estimates do not include any potential emission-reduction measures (e.g., watering of exposed soils to reduce dust, and limits on vehicle idling). As such, the construction emissions modeling is highly conservative in its assumptions.

In the absence of adopted quantified significance thresholds for short-term construction projects, the annual construction emissions estimated for each of the two modeled construction scenarios are compared against the SBCAPCD's general guidance for determining the significance of construction impacts (25 tons per year for ROCs [ROGs or VOCs] or NO_x).

Operational Air Quality Impacts

Operational emissions were calculated separately from the construction emissions in CalEEMod because the model incorporates varying vehicle emissions and appliance emission levels over time, incorporating the operating year into the analysis, as well as requiring that construction is completed before operations (or occupancy) occurs. The analysis of operational air quality impacts is based on air quality modeling results for the potential development of up to 34,588 new dwelling units and 1,549,170.8 sf of net new ground-floor commercial floor area under the Housing Element Update by 2031 (Chapter 3, *Environmental Impact Analysis*). Operational emissions associated with the Housing Element Update are estimated using CalEEMod for area, energy, and mobile source emissions. Area source emissions would be generated by consumer products, architectural coating, and landscape maintenance equipment. Energy source emissions are generated by emissions resulting from electricity and natural gas consumption for space and water heating. Mobile emissions that would result from vehicle trips within the County were calculated based on the proposed Project's Transportation Study (Appendix F) including Project vehicle miles traveled (VMT) and other default traffic assumptions embedded in CalEEMod.

Table 3.3-5. Construction Emissions Modeling Scenario Assumptions

Development Component	Buildout Assumptions Scenario 1 – Rezone Site No. 1 (Giorgi)	Buildout Assumptions Scenario 2 – Rezone Site No. 19 (Key Site 1)
Region / Housing Market Area (HMA)	South Coast	North County (Lompoc Valley, Santa Ynez Valley, Santa Maria Valley, and Cuyama Valley HMA)
Proposed Residential Zoning	DR-40	C-2 (Mixed Use) and MR-O
Parcel Size (acre)	64.8	24.71
Number of Residential Units	3,369	2,099
Residential Type	Apartments – Mid-Rise	Apartments – Mid-Rise
Residential Area (sf)	3,369,000	2,099,000
Resident Population (2.89 persons per household)	9,736	6,066
Proposed Commercial Zoning	--	C-2 and MR-O (Mixed Use)
Commercial Type	--	Retail – Strip Mall
Commercial Area (sf)	--	364,000
Commercial Parking Standards	--	1 space per 500 sf (Land Use and Development Code [LUDC] Section 35.36.060)
Number of Commercial Parking Spaces	--	728
Area of Commercial Parking (acre)	--	6.55
Landscaping, Hardscapes, Construction Requirements	CalEEMod defaults, based on sf	CalEEMod defaults, based on sf
Construction Start Date	January 1, 2024	January 1, 2024
Operational Year	2030	2030
Construction Schedule	CalEEMod defaults	CalEEMod defaults

Potential operational emissions were calculated using CalEEMod under two separate model runs, separating buildout assumptions between the South Coast HMA and the North County HMAs (Lompoc Valley, Santa Ynez Valley, Santa Maria Valley, and Cuyama Valley HMAs). The buildout assumptions were separated in this way due to the unique physiographical character of the county and split into utility service areas. CalEEMod distinguishes between these two regions, characterizing them as having separate climactic settings, which can influence air quality. CalEEMod also applies differing emissions calculations for utility service providers in these regions due to the North County receiving services from the Pacific Gas and Electric Company (PG&E) and the South Coast receiving services from Southern California Edison (SCE). The utility emissions factors utilized in the model also differ from one another. The geographic boundary for these two regions is the Santa Ynez Mountains, which coincides with the division between the PG&E and SCE service boundaries, as well as the County's distinction between the North County and South Coast regions for the RHNA.

CalEEMod default values were utilized for most operational inputs in each of the two model scenarios. However, in each scenario, default inputs relating to the calculation of construction emissions were negated to provide an estimate of only the operational emissions associated with the Project. Further, default values for indoor and outdoor water demands and solid waste generation were overridden to reflect the water demand and solid waste generation rates calculated as part of this Program EIR (Section 3.15, *Utilities and Water Supply*). Mobile trip rate and trip length assumptions were also modified to achieve an overall annual VMT that reflects the VMT calculated for the proposed Project as part of the Program EIR's Transportation Analysis (Section 3.14, *Transportation* and Appendix F). Specific assumptions developed for each scenario as modeled in CalEEMod are summarized in Table 3.3-6 below.

Table 3.3-6. Operational Emissions Modeling Scenario Assumptions

Development Component	South Coast Buildout Scenario Assumptions	North County Buildout Scenario Assumptions
Region/HMA	South Coast HMA	North County (Lompoc Valley, Santa Ynez Valley, Santa Maria Valley, and Cuyama Valley HMAs)
Proposed Residential Units	17,663 MFDs; 379 SFDs	15,522 MFDs; 994 SFDs
Residential Type	Apartments – Mid Rise (MFDs); Single-Family Housing (SFDs)	Apartments – Mid Rise (MFDs); Single-Family Housing (SFDs)
Residential Area (sf)	CalEEMod defaults	CalEEMod defaults
Residential Acreage	CalEEMod defaults	CalEEMod defaults
Resident Population (2.89 persons per household)	52,141	47,732
Proposed Commercial Area (sf)	14,325	1,534,800
Commercial Acreage	CalEEMod defaults	CalEEMod defaults
Commercial Type	Retail – Strip Mall	Retail – Strip Mall
Commercial Parking Standards	1 space per 500 sf (LUDC Section 35.36.060)	1 space per 500 sf (LUDC Section 35.36.060)
Number of Commercial Parking Spaces	29	3,070
Area of Commercial Parking (acre)	CalEEMod defaults	CalEEMod defaults
Operational Year	2031	2031
Water Demand (AFY)	2,899.94	3,052.64
Solid Waste Generation (tpy)	40,349.11	49,160.21
Calculated Daily VMT	1,418,235	1,123,160
Construction Schedule	CalEEMod defaults	CalEEMod defaults

Notes: sf = square feet; AFY = acre-feet per year; tpy = tons per year

To determine whether operation air quality impacts would be significant, the maximum daily emissions were summed between the scenarios and compared against SBCAPCD's numerical thresholds. It should be noted that similar to the construction emissions modeling scenarios, the CalEEMod default assumptions for calculating area source, energy source, and mobile-source emissions estimates do not reflect any additional sustainability features or development standards mandated by recent state and local regulations (e.g., water efficiency, sustainable building standards).

Similarly, the energy source emissions rates for electrical and natural gas supplies do not account for County enrollment in the Central Coast Community Energy (3CE) program, which delivers clean and renewably sourced electricity to existing and future customers throughout the county. Therefore, the operational emissions estimates represent a highly conservative, worst-case emission estimate.

Health Risks from Criteria Air Pollutants

In December 2018, the California Supreme Court held that the EIR for the Friant Ranch Project – a 942-acre master-planned, mixed use development with over 2,500 senior dwelling units, 250,000 sf of commercial space, and extensive open space/recreational amenities on former agricultural land in north central Fresno County – was deficient in its informational discussion of air quality impacts as they relate to adverse human health effects.

As noted in the *Brief of Amicus Curiae* prepared by the SCAQMD in the Friant Ranch case (April 6, 2015), SCAQMD concluded that currently available regional modeling tools are not well suited to analyze relatively small changes in criteria pollutant concentrations associated with individual projects. Regional modeling tools developed by air districts throughout the state, including SBCAPCD, are generally designed to be used at the federal, state, regional, and/or local levels and are not well-equipped to analyze whether and to what extent the criteria pollutant emissions of an individual project directly impact human health in a particular area. Even where an HRA can be prepared, however, the resulting maximum health risk value is only a calculation of risk – it does not necessarily mean anyone will contract cancer or non-cancer health risks as a result of the project. Though the *Brief of Amicus Curiae* was prepared by the SCAQMD, the SCAQMD maintains some of the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the state.

For local plans or projects that exceed any identified numerical threshold adopted by local agencies or air districts, EIRs typically identify and disclose generalized health effects of certain air pollutants but are currently unable to establish a reliable connection between any local plan or an individual project and a particular health effect. In addition, no relevant agency has approved a quantitative method to reliably and meaningfully do so. Several factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan or project level, and the intrinsically complex nature of the relationship between air pollutants and health effects in conjunction with local environmental variables. Therefore, at the time, it is infeasible for this Program EIR to directly link the proposed Project's significant air quality impacts with a specific health effect, particularly as the precise location, size, and land uses associated with future residential development projects are not currently known.

Toxic Air Contaminants

SBCAPCD states that some classifications of projects are more likely than others to emit toxic pollutants. These may include commercial or industrial activities such as oil and gas processing, gasoline dispensing, dry cleaning, electronic and parts manufacturing, medical equipment sterilization, freeways, and rail yards that may increase the exposure to air pollution and associated cumulative risk should be considered (SBCAPCD 2022c). For projects that involve the generation of TACs, health risk assessment modeling may be required to determine the significance of impacts on nearby sensitive receptors. The significance threshold for long-term public health risk is set at 10 excess cancer cases in a million for cancer risk. For non-cancer risk, the significance level is set at a Hazard Index of more than one (1.0).

Due to the largely residential and limited commercial nature of the proposed Project, the greatest potential for TAC impacts associated with the Housing Element Update would be related to diesel-fueled trucks and other vehicles along high-volume freeways located near potential housing sites. CARB recommended in 2005 to avoid siting new sensitive land uses, including residential uses, within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. State law restricts the siting of new schools within 500 feet of a freeway, urban roadways with 100,000 vehicles per day, or rural roadways with 50,000 vehicles with some exceptions. However, no such requirements apply to the siting of residences, daycare centers, playgrounds, or medical facilities (CARB 2005; California Education Code Section 17213 and California Public Resources Code Section 21151.8).

Given the programmatic nature of the proposed Project, it is not feasible to prepare a detailed assessment of the potential health risks associated with the potential siting of development of identified housing sites within 500 feet of high-volume roadways or rail lines. In addition, concerning health risks associated with locating sensitive land uses in proximity to freeways and other high-traffic roadways, SBCAPCD concludes that health risk analysis modeling may not thoroughly characterize all the health risks associated with nearby exposure to traffic-generated pollutants. Therefore, SBCAPCD does not recommend using health risk assessment modeling as a tool for assessing health risk impacts for these types of projects. Instead, SBCAPCD recommends that sensitive land uses such as residences, schools, daycare centers, playgrounds, and medical facilities should not be sited within 500 feet of U.S. Highway 101, and recommends policies that require redesigning projects so that sensitive receptors are moved at least 500 feet away from U.S. Highway 101 to reduce potential health impacts (SBCAPCD 2017a). As such, potential impacts of the proposed Project as they relate to TACs and public health risks associated with development near U.S. Highway 101 are instead based on whether implementation of the Housing Element Update may enable future housing development within 500 feet of U.S. Highway 101 and whether policies requiring siting of development may be required to reduce potential health risks.

Mobile-source CO Modeling

While the County and SBCAPCD have adopted thresholds for determining impacts from the generation of a CO "hot spot", SBCAPCD has concluded that due to the relatively low background ambient CO levels in Santa Barbara County, localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards. Therefore, CO "hot spot" analyses are no longer required (SBCAPCD 2022c). As such, this Program EIR does not provide a detailed analysis of impacts associated with CO "hot spots", and impacts are considered insignificant.

3.3.4.2 Project Impacts

Table 3.3-7 provides a summary of the proposed Project's impacts related to air quality. A detailed discussion of each impact follows.

Table 3.3-7. Summary of Air Quality Impacts

Air Quality Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact AQ-1. The proposed Project would not be potentially inconsistent with applicable air quality plans, including the Ozone Plan and County Land Use Element Air Quality Supplement.	Insignificant	None required	Insignificant impacts
Impact AQ-2. The proposed Project would potentially violate an air quality standard or substantially contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which Santa Barbara County is in nonattainment.	Potentially significant	MM AQ-1 (PM_{10} and Dust Control) MM AQ-2 (Exhaust Emissions) MM AQ-3 (Project Screening and Project-specific Air Quality Evaluation) MM T-1 (Site-based TDM)	Significant and unavoidable impacts
Impact AQ-3. The proposed uses and related development enabled under the proposed Project could expose sensitive receptors to substantial pollutant concentrations or toxic or hazardous air pollutants.	Potentially significant	MM HAZ-1 (Environmental Site Assessment) MM AQ-4 (Project Siting and Interior Air Quality Protection)	Significant but mitigable impacts
Impact AQ-4. The proposed uses and related development enabled under the proposed Project could generate odors or nuisance problems impacting a considerable number of people.	Insignificant	None required	Insignificant impacts
Cumulative Impacts	Potentially significant	MM AQ-1 (PM_{10} and Dust Control) MM AQ-2 (Exhaust Emissions) MM AQ-3 (Project Screening and Project-specific Air Quality Evaluation) MM AQ-4 (Project Siting and Interior Air Quality Protection) MM HAZ-1 (Environmental Site Assessment) MM T-1 (Site-based TDM)	Significant and unavoidable impacts

Impact AQ-1. The proposed Project would not be potentially inconsistent with applicable air quality plans, including the Ozone Plan and County Land Use Element Air Quality Supplement.

As previously discussed, in analyzing future pollutant emissions in the county, the 2022 Ozone Plan relies upon growth projections, which are based in part on SBCAG's Regional Growth Forecast 2050, as well as transportation activity data from SBCAG's Connected 2050 RTP/SCS. SBCAG compiles growth estimates received from individual jurisdictions and generates projections for the region. When the SBCAG projections are released, regulatory documents such as a general plan or specific plan are considered to comply with SBCAG projections, as the information contained in such documents has at that point been incorporated into the SBCAG projections. SBCAG updates the regional forecasts and projections approximately every five years. However, communities do not always update the growth information provided to SBCAG on the same schedule. For instance, the County's housing element of the Comprehensive Plan is updated every eight years, rather than every five. This can lead to inconsistencies between Comprehensive Plan amendments and SBCAG projections at the time of general plan approval.

The Project's consistency with the Connected 2050 RTP/SCS and the Regional Growth Forecast is presented in Section 3.10, *Land Use and Planning,* and Section 3.12, *Population and Housing*. As discussed therein, SBCAG adopted the 2050 Connected RTP/SCS in August 2021. The growth projections of the 2050 Connected RTP/SCS are based on the 2050 Regional Growth Forecast, which was published in 2019 and does not factor in more recent housing, population, and employment trends, including the newest 6th Cycle RHNA for Santa Barbara County.

Due in part to this discrepancy and the conservative maximum potential buildout scenario developed for this Program EIR analysis, as described in Impact PH-1, the projected increases in residential development and associated population growth resulting from the Housing Element Update would be substantially greater than the projections anticipated in SBCAG's Connected 2050 RTP/SCS and Regional Growth Forecast. However, given the discrepancy in the Ozone Plan and Regional Growth Forecasts (the latter of which informs the Ozone Plan projections, along with Department of Finance data), inconsistency in population growth projections alone would not make the Housing Element Update inconsistent with the Ozone Plan. Rather, the determination of whether the Housing Element Update would conflict with the Ozone Plan is based on its consistency with Ozone Plan policies and standards, instead of the growth assumptions, which again do not account for growth required by the state as set forth in the County's 6th Cycle RHNA.

The Housing Element Update would not conflict with the 2022 Ozone Plan. The 2022 Ozone Plan includes stationary-source control measures to be implemented through the SBCAPCD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with SBCAG, local governments, transit agencies, and others. As discussed further in Section 3.10, *Land Use and Planning,* the proposed Project involves the adoption of amendments to the County's Comprehensive Plan with various goals, policies, and programs that enable the production of housing at targeted affordability levels to meet the RHNA and further provision of fair housing to address the local housing crisis and incentivize and prioritize housing production in a manner that affirmatively furthers fair housing. Several of the goals and objectives of the Housing Element Update are also oriented towards promoting livable communities, increasing housing for people who live and/or work in Santa Barbara County, promoting housing development on infill sites with access to jobs and services, and promoting the jobs-to-housing balance by facilitating housing

development near job centers and essential community services (Section 2.3.1, *Goals and Objectives*). Development of future housing consistent with these goals would have the effect of reducing commuter trips in and out of the county and increasing the use of active transportation (i.e., walking, bicycling, transit) by locating housing in proximity to jobs and services and promoting the jobs-to-housing balance. The proposed Project would increase the regional population and increase regional VMT. (For additional discussion on regional population growth and regional VMT see Impact PH-1 in Section 3.12, *Population and Housing* and Impact T-2 in Section 3.14, *Transportation.*) As a result, the proposed Project would have associated increases in mobile-source emissions (Impact AQ-2), However, the development of housing in this way would not obstruct or be incompatible with the implementation of the O_3 and O_3 precursor emissions reduction goals and strategies of the Ozone Plan.

Further, the Air Quality Supplement of the County Comprehensive Plan Land Use Element identifies and provides land use planning measures that serve to reduce emissions generated from sprawling land use development and increase the reliance on the automobile. Policies and measures from the Land Use Element Air Quality Supplement generally include directing development to be located in existing urbanized areas, promoting infill and improving the jobs-to-housing balance, and promoting development that reduces auto dependency. As broadly discussed above and analyzed in detail in Section 3.10, *Land Use and Planning* (Impact LU-2), the Housing Element Update focuses development of new housing in the Urban Area with existing services and aims to improve the jobs-to-housing balance, which would be consistent with applicable policies, goals, and measures of the Land Use Element-Air Quality Supplement. Therefore, impacts are considered *insignificant.*

Impact AQ-2. The proposed Project would potentially violate an air quality standard or substantially contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which Santa Barbara County is in nonattainment.

The proposed Project would foster housing development projects that would result in the generation of air pollutants through the use of heavy equipment during construction and mobile and area source emissions from operation. Emissions for individual housing projects may be reduced through project-specific mitigation measures; however, when taken together, collective emissions associated with residential development enabled under the Housing Element Update through the planning horizon of 2031 would exceed thresholds.

Construction

Residential development enabled under the Housing Element Update would require construction activities that could generate short-term construction-related air pollutant emissions. Construction activities would depend on the timing of individual projects and would vary day by day, monthly, and annually through the planning horizon of 2031. Construction activities would generally involve four stages: 1) site preparation; 2) grading and excavation; 3) construction; and 4) final coating along with landscaping improvements and paving activities. In some cases where housing sites are identified for existing nonvacant sites, individual housing projects could also involve demolition activities. Short-term increases in criteria pollutant emissions would result from all phases of construction activities, particularly due to the disturbance of soil and operation of heavy equipment such as trucks, graders, scrapers, compressors, and generators. Emissions from construction activities would include PM_{10} and exhaust emissions (ROCs, NO_x, CO, SO_2, $PM_{2.5}$).

A significant impact may occur if residential development enabled under the Housing Element Update exceeds SBCAPCD's recommended numerical thresholds for determining the significance of short-term, construction-related impacts. Because the SCCAB is currently in nonattainment for O_3 (for which ROCs and NO_x are precursors) and PM_{10} under federal and state standards, residential development enabled under the Housing Element Update could generate emissions exceeding SBCAPD's recommended thresholds and contribute to further air quality violations for nonattainment criteria pollutants.

As described in the *Methodology* discussion under Section 3.3.4.1, *Thresholds of Significance,* modeling of construction emissions was performed using CalEEMod. Two CalEEMod scenarios were prepared to estimate emissions from some of the largest potential development projects that could occur as a result of the proposed Project. The estimated maximum annual construction emissions calculated for each of the modeled construction scenarios are presented in Table 3.3-8 and compared against SBCAPCD's recommended thresholds for characterizing impacts from short-term construction-related air pollutant emissions (Appendix C).

Table 3.3-8. Estimated Annual Construction Emissions (tons per year)

	ROGs (VOCs)	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Scenario 1: Potential Rezone Site No. 1 (Giorgi) (South Coast)						
Emissions (2024)	0.067	4.26	5.61	0.02	2.01	**0.79**
Emissions (2025)	0.95	**4.28**	8.19	**0.03**	**2.23**	0.68
Emissions (2026)	0.91	4.18	7.77	**0.03**	**2.23**	0.68
Emissions (2027)	0.87	4.10	7.47	**0.03**	**2.23**	0.68
Emissions (2028)	0.71	3.51	6.29	0.02	1.92	0.57
Emissions (2029)	**13.23**	0.19	0.53	<0.01	0.12	0.04
Maximum	**13.23**	**4.28**	**8.19**	**0.03**	**2.23**	**0.79**
SBCAPCD Recommended Threshold	**25**	**25**	--	--	--	--
Exceed Threshold?	**No**	**No**	--	--	--	--
Scenario 2: Potential Rezone Site No. 19 (Key Site 1) (Santa Maria Valley)						
Emissions (2024)	0.59	**4.12**	5.02	0.01	1.61	**0.71**
Emissions (2025)	0.75	3.98	**6.64**	**0.02**	**1.75**	0.53
Emissions (2026)	0.71	3.90	6.33	**0.02**	**1.75**	0.53
Emissions (2027)	0.69	3.83	6.12	**0.02**	**1.75**	0.53
Emissions (2028)	0.66	3.76	5.92	**0.02**	1.74	0.53
Emissions (2029)	**12.86**	1.87	3.12	<0.01	0.81	0.25
Maximum	**12.86**	**4.12**	**6.64**	**0.02**	**1.75**	**0.71**
SBCAPCD Recommended Threshold	**25**	**25**	--	--	--	--
Exceed Threshold?	**No**	**No**	--	--	--	--

Construction activities generating NO_x emissions would primarily be attributed to the operation of vehicles and large equipment that would occur throughout the construction process, but would generally be highest during the grading and building construction phases. Construction activities generating ROG (VOC) emissions would largely be attributed to the application of architectural coatings and paints during the final finishing phase of construction. As summarized in Table 3.3-8, the maximum annual construction-generated emissions under Scenario 1 (Rezone Site No. 1 [Giorgi]), involving the development of up to 3,369 new residential dwelling units, would total approximately 13.23 tons of ROG (VOC) per year and 4.28 tons of NO_x per year. The maximum annual construction-generated emissions under Scenario 2 (Rezone Site No. 91 [Key Site 1]), involving the development of up to 2,099 new residential dwelling units and 364,000 sf of commercial development is approximately 12.86 tons of ROG (VOC) per year and 4.12 tons of NO_x per year. Neither construction scenario, which again represents the largest potential development projects that could be enabled under the proposed Project (by region) and is therefore representative of worst-case construction scenarios, would exceed SBCAPCD's recommended threshold of 25 tons per year of combined ROG and NO_x.

While SBCAPCD and the County do not have adopted thresholds for construction-related PM_{10} emissions, due to the county's designated nonattainment status for PM_{10}, SBCAPCD and the County consider any discretionary project involving earth-moving activities as having the potential to generate PM_{10} emissions that could generate or contribute to a violation of federal and state air quality standards. In addition, the generation of fugitive dust during construction could have the potential to generate a public nuisance (SBCAPCD Rule 303) and/or result in noncompliance with SBCAPCD's requirements and standards for visible dust (SBCAPCD Rule 345). As such, the proposed Project and the construction of improvements associated with discretionary actions are considered to result in a *potentially significant* impact from short-term PM_{10} emissions from construction. While not discretionary, by-right development projects also enabled under the Housing Element Update, which could include large housing projects involving extensive earth-moving activities, are considered to also result in *potentially significant* impact from short-term PM_{10} emissions from construction. These potential impacts could potentially be compounded by concurrent, overlapping construction schedules resulting from permitting and construction of numerous housing sites, particularly those located near one another, over the 8-year planning horizon, which would be likely based on the housing sites inventory prepared for the Housing Element Update.

Consistent with SBCAPCD's guidance and the County Grading Code, **MM AQ-1 (PM_{10} and Dust Control)** would require that construction activities associated with future ministerial housing development projects or multifamily housing projects on potential County-owned sites permitted under the Housing Element Update implement measures to control PM_{10} and fugitive dust emissions generated during all stages of site construction. In addition, **MM AQ-2 (Exhaust Emissions)** would require future projects to implement measures to reduce construction-related exhaust emissions (PM_{10}) to the maximum extent feasible. Implementation of **MM AQ-1** and **MM AQ-2** would ensure that future construction projects enabled under the proposed Project would not generate PM_{10} emissions that would generate or contribute to a violation of federal and state air quality standards, or violate existing SBCAPCD rules. With the implementation of these measures, construction impacts associated with the proposed Project would be *significant but mitigable.*

Operational

Residential development enabled under the Housing Element Update would generate long-term operational emissions. Because the county is in nonattainment for O_3 and PM_{10}, the proposed Project

could contribute to the existing nonattainment status for these pollutants. Operational emissions generated by area and mobile sources would result from normal day-to-day activities. Area source emissions would be generated by space and water heating devices, and the operation of landscape maintenance equipment. Mobile emissions would be generated by the vehicles traveling to and from potential development and destination sites within the county.

As described in the *Methodology* discussion of Section 3.3.4.1 *Thresholds of Significance*, modeling of operational emissions was performed using CalEEMod. Two model runs were prepared to model operational emissions associated with the buildout and operation of future housing development within the South Coast and North County regions. The estimated daily operational emissions from each of these model runs were combined to present the total maximum daily emissions associated with the buildout and operation of future housing development countywide. The estimated maximum daily emissions are presented in Table 3.3-9 and are compared against appliable thresholds for determining the significance of impacts associated with operational emissions (Appendix C). As previously discussed, it should be noted that the CalEEMod model runs performed for this analysis do not account for the implementation of existing federal, state, or local regulations, sustainability features, or development standards aimed at reducing air emissions.

Further, as discussed in Section 3.7, *Greenhouse Gas Emissions,* and Section 3.14, *Transportation,* the operational air emissions estimates do not account for likely reductions in mobile-source emissions that would be achieved through providing substantial new housing opportunities for existing workers that reside outside of job centers in the county or adjacent counties and currently commute for work. As such, the modeled emissions do not account for the potential reduction in commuter trips and associated decrease in vehicle combustion emissions that would be anticipated to occur as a result of the proposed Project. Therefore, these emissions estimates represent a highly conservative, worst-case analysis of operational impacts.

Based on the air emissions modeling results, the increase in emissions for NO_x, ROC, and PM_{10} resulting from the operation of the proposed Project would substantially exceed adopted operational significance thresholds for all, as well as mobile-source-specific emissions. The primary contributors to the exceedance of adopted thresholds include area-source emissions, such as those generated from the use of consumer products and re-application of architectural coatings, and mobile-source emissions associated with the Project's substantial increases in daily vehicle trips. Because the proposed Project would exceed SBCAPCD thresholds for the pollutants for which the county is in nonattainment, the Housing Element Update would result in substantial contributions of these pollutants during operation. However, it should be noted that the County's and SBCAPCD's significance thresholds for criteria pollutants do not distinguish between land use plans/programs and individual development projects. The Housing Element Update is a component of the County's Comprehensive Plan that addresses residential development on a programmatic level and would involve several simultaneous developments throughout the planning horizon. Therefore, the application of the SBCAPCD thresholds to a program-level EIR is highly conservative.

In addition, it should be noted that this analysis may overestimate increases in emissions as the Housing Element Update has a reasonable potential to increase the proportion of those workers that currently both reside and work in the county, potentially decreasing mobile emissions related to commute trips. This would occur due to the provision of substantial amounts of new housing, particularly affordable housing, which would create significant new housing opportunities for workers from the county's service, retail, and hospitality sectors to live and work in the county or closer to existing job centers. Further, as described in Impact AQ-1, the Housing Element Update is consistent with the overall goals and strategies of the Ozone Plan and Land Use Element – Air Quality

Supplement which include strategies to reduce regional air pollutant emissions. Specifically, the Housing Element Update prioritizes promoting livable communities, increasing housing for people who live and/or work in Santa Barbara County, promoting housing development on infill sites with access to services, and promoting the jobs-to-housing balance by facilitating housing development near job centers and essential community services (Section 2.3.1, *Goals and Objectives*). Development of future housing consistent with these goals would have the effect of reducing commuter trips in and out of the county and increasing the use of alternative transportation by locating housing in proximity to jobs and services and promoting the jobs-to-housing balance.

On a project-by-project basis, the operational impacts of individual housing projects also have the potential to exceed SBCAPCD operational mobile-source emissions thresholds. While this analysis does not include modeling of emissions of an individual project, Attachment A of SBCAPCD's Scope and Content of Air Quality Sections in Environmental Documents (2022) includes a screening table list of common land uses the most common types of land uses and estimates the size of a specific project type that is expected to be less than the threshold of significance for ROC and NO_x emissions from vehicles. Based on this table, an individual housing project involving greater than 290 detached SFDs with a density of three dwelling units per acre or a project involving 400 MFDs with a density of 16 dwelling units per acre are anticipated to result in operational emissions exceeding SBCAPCD's operational mobile-source emissions thresholds. Based on the sites inventory prepared for the Housing Element Update and the buildout assumptions presented in this Program EIR, many housing sites, particularly higher density potential County-owned sites and potential rezone sites would exceed these screening thresholds. For instance, many of the sites identified as part of the Potential Rezone Program could individually involve the development of well over 500 units, with densities ranging from 20 to 40 dwelling units per acre (du/ac).

Notwithstanding, when evaluated against the County's and SBCAPCD's quantitative thresholds, the combined operational emissions of potential land use changes anticipated to occur under the Housing Element Update would exceed greatly applicable thresholds. Therefore, this impact would be *potentially significant.*

To address impacts associated with long-term operational emissions from the operation of individual development projects, implementation of **MM AQ-3 (Project Screening and Project-specific Air Quality Evaluation)** would require applicants to prepare and submit a technical assessment evaluating the potential project operational air quality impacts to the County and identify project-specific mitigation feasible to reduce long-term area, energy, and mobile-source emissions below County and SBCAPCD thresholds of significance. In addition, as described in Section 3.14, *Transportation,* implementation of **MM T-1 (Site-based TDM)**, requiring implementation of measures to reduce Project VMT, would also apply project-by-project and would help to reduce VMT and associated mobile-source emissions. Implementation of these measures would ensure that the operation of individual development projects does not result in significant long-term operational emissions in exceedance of adopted thresholds by implementing a mix of measures to reduce area, energy, and mobile-source emissions generated from larger development projects exceeding SBCAPCD screening criteria. While implementation of these measures would be considered sufficient to reduce impacts on a project-by-project basis, the combined cumulative effect of the operation of all housing development enabled under the proposed Project is still very likely to exceed County and SBCAPCD thresholds, largely due in part to the absence of plan/program-level thresholds applicable to projects such as the Housing Element Update. Therefore, the long-term operational impacts of the proposed Project, even after implementation of mitigation addressing impacts from individual development projects, would remain *significant and unavoidable.*

Table 3.3-9. Estimated Maximum Daily Operational Emissions (lbs/day)

Category	ROG (VOC)	NO_X	CO	SO_2	Fugitive PM_{10}	Exhaust PM_{10}	PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$	$PM_{2.5}$
Operational Emissions from Buildout on the South Coast										
Area	476.70	17.11	1,484.56	0.08	0.0	8.25	8.25	0.0	8.25	8.25
Energy	6.09	52.12	22.14	0.33	0.0	4.21	4.21	0.0	4.21	4.21
Mobile	198.08	264.34	1,930.84	4.09	535.44	2.68	538.12	143.02	2.51	145.52
Total	**680.87**	**333.57**	**3,437.54**	**4.50**	**535.44**	**15.14**	**550.58**	**143.02**	**14.97**	**157.98**
Operational Emissions from Buildout in the North County										
Area	491.51	15.67	1,359.46	0.07	0.0	7.56	7.56	0.0	7.56	7.56
Energy	4.73	40.49	17.63	0.26	0.0	3.27	3.27	0.0	3.27	3.27
Mobile	432.29	627.37	4,844.86	11.25	1,490.37	7.16	1,497.53	398.08	6.70	404.78
Total	**928.53**	**683.53**	**6,221.95**	**11.58**	**1,490.37**	**17.99**	**1,508.36**	**398.08**	**17.53**	**415.61**
Total Operational Emissions from Buildout Countywide										
Area	968.21	32.78	2,844.02	0.15	0.0	15.81	15.81	0.0	15.81	15.81
Energy	10.82	92.61	39.77	0.59	0.0	7.48	7.48	0.0	7.48	7.48
Mobile	630.37	891.71	6,775.70	15.34	2,025.81	9.84	2,035.65	541.10	9.21	550.30
Total	**1,609.40**	**1,017.10**	**9,659.49**	**16.08**	**2,025.81**	**33.13**	**2,058.94**	**541.10**	**32.50**	**573.59**
SBCAPCD Threshold (all sources)	240	240	--	--	--	--	80	--	--	--
Exceed Threshold?	**Yes**	**Yes**	--	--	--	--	**Yes**	--	--	--
SBCAPCD Threshold (mobile sources)	25	25	--	--	--	--	--	--	--	--
Exceed Threshold?	**Yes**	**Yes**	--	--	--	--	--	--	--	--

Impact AQ-3. The proposed uses and related development enabled under the proposed Project could expose sensitive receptors to substantial pollutant concentrations or toxic or hazardous air pollutants.

As discussed in Section 3.3.2, *Environmental Setting*, sensitive receptors include individuals with pre-existing health problems, those who are close to an emissions source, or those who are exposed to air pollutants for long periods, and the establishments that host these individuals. Examples of sensitive receptors include schools, hospitals, and convalescent homes because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Sensitive receptors affected by the proposed Project would be residences, parks, hospitals, long-term care facilities, daycare centers (including public and private childcare centers, and worksites with onsite childcare facilities), and schools adjacent to potential housing sites. primarily residences, parks, and school land uses. Common types of sensitive receptors, such as hospitals, parks, and nursing homes, have the potential to be affected and are generally located in urban settings. The sensitive receptors described in Section 3.3.2, *Environmental Setting*, could experience adverse health effects from emissions generated from the construction and operation of residential development enabled under the Housing Element Update. Some examples of specific sensitive receptors located in close proximity to housing sites include, but are not limited to, Dos Pueblos High School located south of Rezone Site No. 11 (Glen Annie) and El Camino Elementary School located near Rezone Site Nos. 8 (San Marcos Growers 1), 9 (San Marcos Growers 2), 10 (McCloskey Leland), and 17 (Montessori), and Pending Project No. 42 (Tatum).

Typical Construction Emissions

Emissions generated by construction activities that are most likely to cause adverse effects on nearby sensitive receptors typically include fugitive dust (PM), diesel particulate matter (DPM) emissions, CO, NO_x, and ROGs (O_3 precursors). Sources of these pollutant emissions include exhaust of diesel-powered engines, emissions from combustion engines, and the generation of fugitive dust from earthmoving activities and soil disturbance. Operation of heavy equipment and vehicles associated with new residential development would temporarily generate diesel exhaust, CO, and fugitive dust emissions on- and offsite, which could affect sensitive receptors located proximate to a project construction site or construction traffic route. Pollutant emissions from individual site construction activities would fluctuate depending on the level and type of construction activity; however, temporary exposures associated with residential construction activities are generally not considered to create a substantial risk. Such emissions and impacts associated with individual construction projects would occur incrementally throughout site construction, which would be limited to a short period on an individual project basis. Further, as described in Impact AQ-2 above, the estimated annual construction emissions associated with large development projects enabled under the Housing Element Update are not anticipated to generate emissions exceeding SBCAPCD's recommended thresholds. However, the County and SBCAPCD consider all construction activities within the county that involve earthwork activities to cause potential impacts from short-term PM_{10} and fugitive dust emissions. Given the proximity of several identified housing sites to existing sensitive receptors, the construction of individual development projects may generate PM_{10} and/or fugitive dust emissions that adversely affect nearby sensitive receptors. This could be particularly true where multiple housing sites are located near one another resulting in overlapping grading activities, causing a compounding, cumulative issue with regards to PM_{10} and dust emissions. As such,

impacts from construction activities on nearby sensitive receptors are considered *potentially significant.*

Consistent with SBCAPCD's guidance and the County Grading Ordinance (County Code Chapter 14), **MM AQ-1** and **MM AQ-2** would require that construction activities associated with all future development projects permitted under the Housing Element Update implement measures to control PM_{10}, fugitive dust, and equipment exhaust emissions generated during all stages of site construction. Implementation of **MM AQ-1** and **MM AQ-2** would ensure that future construction projects enabled under the proposed Project would not generate PM_{10} emissions that would generate or contribute to substantial PM_{10} or fugitive dust emissions adversely affecting nearby sensitive receptors, or violate existing SBCAPCD rules, including SBCAPCD nuisance rules. With the implementation of these measures, impacts from typical construction activities would be reduced to *potentially significant but mitigable.*

Asbestos Containing Materials and Lead Based Paints

In addition to standard construction emissions, construction of residential development projects could have the potential to expose nearby sensitive receptors to the release of other hazardous air emissions associated with demolition activities. The Housing Element Update sites inventory includes several nonvacant sites that are currently developed existing structures. For instance, Rezone Site Nos. 14 (Hope Community Church), 17 (Montessori), and 31 (Element Church) are all nonvacant sites with existing structures. While no specific details regarding the development of these sites are available, existing structures on an identified housing site may be demolished to support future residential development of the site. Further, while the condition of the building material of these existing structures is uncertain at this time, older structures, particularly those constructed before 1970, may be developed with materials such as asbestos-containing materials (ACMs) and lead-based paints (LBPs) which are known to be hazardous. Demolition of any structures containing ACMs and/or LBPs can have the potential to generate fugitive dust containing hazardous materials that could adversely affect nearby sensitive receptors. Given the absence of specific project details and the potential for nonvacant sites to demolish existing structures that could contain ACMs or LBPs, implementation of the Housing Element Update is conservatively considered to result in a *potentially significant impact* from exposure of sensitive receptors to fugitive dust-containing hazardous materials.

As discussed in Section 3.8, *Hazards and Hazardous Materials,* **MM HAZ-1 (Environmental Site Assessment)** would require the preparation of a project-specific Phase I Environmental Site Assessment (ESA) for any vacant, commercial, agricultural, or industrial site before the renovation, demolition, grading, or building permit approval. The Phase I ESA would be required to identify any Recognized Environmental Conditions, which include structures containing ACMs and/or LBPs, and identify necessary remedial activities to reduce risks associated with the development of the site. Implementation of **MM HAZ-1** would serve to eliminate or reduce potential adverse effects associated with the release of fugitive dust containing ACMs or LBPs. Therefore, with the implementation of **MM HAZ-1**, impacts would be *significant but mitigable.*

Toxic Air Contaminants and Adverse Health Risks

Operation of new residential development would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or application of cleaning solutions. The residential developments enabled under the proposed Project would not include the installation of industrial-sized paint booths or involve the extensive use of commercial or

household cleaning products. Further, new commercial development proposed as part of the proposed Project is anticipated to involve only those uses that would be compatible with residential development to allow for mixed use development, consistent with the purpose and requirements of Chapter 35.26 (Special Purpose Zones) of the County Code. Allowed commercial and industrial uses anticipated as part of the proposed Project are not anticipated to consist of uses involving hazardous activities or the generation of hazardous materials and pollutants that are generally considered incompatible with residential development. As such, the potential development is not anticipated to generate TACs.

Instead, impacts from TACs under the proposed Project are anticipated to more likely occur from the development and occupancy of residential uses in areas adjacent to existing emitters of TACs. The greatest potential for TAC impacts associated with the Housing Element Update would be related to diesel-fueled trucks and other vehicles along high-volume freeways located near potential housing sites. As previously discussed, CARB generally considers urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day, to be a source of TACs. In Santa Barbara County, U.S. Highway 101 is the only roadway considered a "high-volume roadway," defined as a roadway that has average daily traffic above 100,000 vehicles in an urban area or 50,000 vehicles in a rural area (SBCAPCD 2017a). While SBCAPCD does not specify which portion of U.S. Highway 101 would meet CARB's criteria, based on data from Caltrans, the only segment of U.S. Highway 101 between which carries over 100,000 vehicles per day is located on the South Coast in the Eastern Goleta Valley stretching approximately 3.1 miles from the junction of SR 154 to the junction of SR 217.

Along this segment of U.S. Highway 101, the sites inventory identifies two potential housing sites (Pending Project Site No. 41 [MTD] and No. 42 [Tatum]) and one County-owned site (4500 Hollister Avenue; County Juvenile Hall Site) within 500 feet of U.S. Highway 101. Development of these two potential housing sites has the potential to expose future residents to increased health risks from TACs. SBCAPCD does not recommend using health risk assessment modeling as a tool for assessing health risk impacts for these types of projects. As such, specific risks to health from the future development of residential uses and occupancy of these sites cannot be assessed. Therefore, implementation of the proposed Project is conservatively considered to result in *potentially significant* impacts associated with TACs.

Consistent with SBCAPCD's recommendations for reducing potential health impacts associated with the location of sensitive uses within 500 feet of U.S. Highway 101, **MM AQ-4 (Project Siting and Interior Air Quality Protection)** would require that housing sites located within 500 feet of the segment of U.S. Highway 101 between the junction of SR 154 and the junction of SR 217, be sited a minimum of 500 linear feet from U.S. Highway 101 to the maximum extent feasible. If development cannot be sited greater than 500 feet from U.S. Highway 101, **MM AQ-4** would require that additional design features be implemented to reduce exposure to highway-related TACs. With the implementation of **MM AQ-4**, Project impacts would be reduced to *significant but mitigable.*

Localized CO Concentrations

As previously discussed in Section 3.3.4.1, *Thresholds of Significance,* while the County and SBCAPCD have adopted thresholds for determining impacts from the generation of a CO "hot spot," SBCAPCD has concluded that due to the relatively low background ambient CO levels in Santa Barbara County, localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards. Therefore, CO "hot spot" analyses are no longer required

(SBCAPCD 2022c), and due to the low background ambient CO levels in the county, impacts associated with CO "hot spots" are considered *insignificant*.

Impact AQ-4. The proposed uses and related development enabled under the proposed Project could generate odors or other nuisance problems impacting a considerable number of people.

According to CARB's CEQA Air Quality and Land Use Handbook (1993), objectionable odors are typically associated with industrial uses, some such as agricultural activities (e.g., farms and dairies), refineries, wastewater treatment facilities, and landfills. The proposed Project would enable the construction and operation of residential and mixed use developments, which do not typically generate nuisance odors perceptible to the general public. Construction that would occur as a result of the proposed Project would be both temporally and geographically intermittent. Any odors that may be generated as a result of the development of individual housing sites would be localized and temporary, and would not affect a substantial number of people or result in a nuisance as defined by SBCAPCD Rule 303.

Operationally, odors that would be expected from residential and commercial development enabled under the proposed Project would typically be associated with solid waste (i.e., refuse) storage typical of urban uses. However, these odors would be consistent with those generated by existing residential and commercial uses throughout the county and would be confined to the immediate vicinity of new residential development. Additionally, it is expected that any individual project-generated refuse would be stored in covered containers and removed regularly consistent with the County's solid waste and recycling pick-up requirements (e.g., LUDC Section 35.30.170). As such, residential development enabled under the proposed Project would not generate odors substantially perceptible by sensitive receptors and impacts associated with generation of objectionable odors would be *insignificant*.

3.3.4.3 Cumulative Impacts

Cumulative impacts related to air quality are related to air emissions that would be generated by regional growth within the county. This would include the construction and operational air quality impacts associated with the potential cumulative pending plans and projects throughout the SCCAB identified in Chapter 3, *Environmental Impact Analysis*.

Cumulative impacts on air quality could result from growth that would be inconsistent with the Ozone Plan and could therefore interfere with the attainment of federal or state ambient air quality standards within the county. As noted in Impact AQ-1 above, the Connected 2050 RTP/SCS and Ozone Plan are based on outdated regional growth forecasts that do not account for the most recent RHNA allocations and housing growth forecasts. Although population forecasts are not in alignment, the Housing Element Update would not obstruct or be incompatible with the implementation of the O_3 and O_3 precursor emissions reduction goals and strategies of the Ozone Plan. Further, implementation of the Housing Element Update, which focuses development of new housing in urban areas with existing services and aims to improve the jobs-to-housing balance would be consistent with applicable policies, goals, and measures of the Land Use Element Air Quality Supplement. Therefore, while the proposed Project would result in regional housing and population growth that is not accounted for in the Connected 2050 RTP/SCS or Ozone Plan, the implementation of the Housing Element Update would not represent a substantial contribution to a cumulatively considerable impact

resulting from consistency with the Connected 2050 RTP/SCS, Ozone Plan, or Land Use Element-Air Quality Supplement, and cumulative impacts would be *insignificant.*

As discussed above in Impact AQ-2, the county is in nonattainment for O_3 and PM_{10}. Per the Ozone Plan, the latest emissions inventory and air quality modeling analysis indicate that significant reductions above and beyond those already achieved are still needed to meet these standards. Construction of individual housing development projects is not likely to exceed SBCAPCD recommended thresholds, and most construction projects are considered to result in insignificant contributions to regional O_3 precursor emissions. However, new construction and grading activities in the county are considered to result in potential impacts from PM_{10} emissions, including exhaust and dust, and the combined, cumulative effect of all construction in the county is considered to result in a cumulatively significant impact. The proposed Project would be required to implement **MM AQ-1** and **MM AQ-2**, which would mitigate significant impacts of the proposed Project to the maximum extent feasible; however, the contribution of the proposed Project would remain cumulatively *significant but mitigable*.

Concerning the contribution of operational emissions of the Housing Element Update, the County concludes that the cumulative contribution of project emissions would be cumulatively considerable if it would result in long-term emissions of O_3 precursors in exceedance of long-term thresholds. Analysis in Impact AQ-2, operational emissions associated with Project activities would greatly exceed adopted thresholds. The implementation of **MM AQ-3** and **MM T-1** would reduce operation emissions to the maximum extent feasible. However, while implementation of these measures would be considered sufficient to reduce impacts on a project-by-project basis, the combined~~As such, the contribution of~~ future emissions from the implementation (i.e., buildout) of the Housing Element Update would represent a substantial contribution to a cumulatively considerable impact. The proposed Project's contribution would represent a cumulatively *significant and unavoidable* cumulative impact.

3.3.4.4 Proposed Mitigation

Implementation of **MM HAZ-1** is required to reduce impacts associated with the release of fugitive dust containing ACMs or LBPs.

Implementation of **MM T-1** is required to reduce Project VMT and associated operational impacts from mobile-source emissions.

MM AQ-1: PM_{10} and Dust Control. The County shall require that applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law implement the following measures to minimize short-term construction PM_{10} and fugitive dust emissions.

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding SBCAPCD's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Onsite vehicle speeds shall be no greater than 15 mph when traveling on unpaved surfaces.

- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.
- If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area by watering, OR using roll-compaction, OR revegetating, OR by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent the transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to SBCAPCD before grading/building permit issuance and/or map clearance.

  Requirements and Timing: These control measures shall be noted on all grading and building plans. The contractor or builder shall provide County P&D monitoring staff and SBCAPCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to:

  - Assure all dust control requirements are complied with including those covering weekends and holidays.
  - Order increased water as necessary to prevent the transport of dust offsite.
  - Attend the pre-construction meeting.

  The dust monitor shall be designated before the issuance of grading. The dust control components apply for the beginning of any grading or construction throughout all development activities until final inspection and until landscaping is successfully installed.

  Monitoring: County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

MM AQ-2: Equipment Exhaust. The County shall require that applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law implement the following measures to minimize short-term construction equipment exhaust emissions to the maximum extent feasible.

- Diesel equipment meeting the CARB Tier 4~~Tier 3~~ or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible.
- On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible.
- Diesel-powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible.
- Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, should be used onsite where feasible.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing lunch onsite.
- Construction truck trips should be scheduled during non-peak hours to reduce peak-hour emissions whenever feasible.
- Proposed truck routes should minimize to the extent feasible impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes of buildings, air conditioners, and windows.

  Plan Requirements and Timing: These control measures shall be noted on all grading and building plans.

  Monitoring: County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

MM AQ-3: Project Screening and Project-Specific Air Quality Evaluation. Project applicants proposing projects that exceed the screening table established in SBCAPCD's most recently available Scope and Content of Air Quality Sections in Environmental Documents, or projects involving the development of a variety of land use categories (e.g., mixed use development projects) shall prepare and submit a technical assessment evaluating potential project operation-related air quality impacts to the County for review and approval. The evaluation shall be prepared in conformance with the County and SBCAPCD methodologies for assessing air quality impacts identified in the County's *Environmental Thresholds and Guidelines Manual* and SBCAPCD's Scope and Content of Air Quality Sections in Environmental Documents. If operational emissions associated with proposed development exceed the County's and SBCAPCD's adopted thresholds of significance for either all source emissions or mobile-source only emissions, the County shall require applicants for new development to identify and incorporate mitigation measures to reduce operational air emissions below adopted thresholds. The technical assessment may account for additional requirements applicable to the proposed development, including VMT reduction strategies and transportation

demand management measures, that would have the secondary effect of reducing mobile or other source emissions. Specific mitigation measures and their effectiveness in reducing emissions below significance shall be demonstrated as part of the technical assessment evaluation and approved by the County. Identified measures shall be included as part of the conditions of approval for the proposed development. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- Participation in the 3CE Prime Program which provides 100 percent renewably sourced electricity to customers.
- Design new residential and commercial development to exceed Title 24 compliance requirements through the design of innovative measures, including incorporation of the following into project building plans:
    - 100 percent electrification of buildings.
    - Solar-ready development.
    - Utilize onsite renewable energy systems (e.g., solar, wind, geothermal, biomass, and/or bio-gas) to offset energy use.
    - Passive cooling strategies, passive cooling planned for or designed into structures (e.g., strategically sized overhands or trellis on the south side, operable skylights, fan, thermal chimney, a cupola or roof opening for hot air venting radiant barrier, or underground cooling tubes).
    - Residential lighting: whole-home, low voltage, lighting control system with conditional logic.
    - Non-residential lighting: For daylit spaces, use automatic, non-dimmed lighting control, automatic, continuous dimming of light sources, or integrated dimming daylight control.
    - Outdoor lighting designed for high efficiency, solar-powered, or controlled by motion detectors.
    - Natural lighting in buildings.
    - Building siting and orientation to reduce energy use and maximize opportunities for solar systems.
    - Summer shading and wind protection measures to increase energy efficiency (e.g., moveable exterior awnings or trees).
    - Protection of building from heat loss (e.g., planting a windbreak, earthen berm, or fin walls to create an air envelope around the building).
    - Use of landscaping to shade buildings and parking lots.
- Provide and require the use of battery-powered or electric landscape maintenance equipment for new development.
- Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers).
- Include design features to encourage alternate transportation modes. Examples include:

- For pedestrians: such as sidewalks, safe streets and parking lot crossings, shade trees, off-street breezeways, alleys and over crossings, placement of parking lots and building entrances to favor pedestrians rather than cars, shower and locker facilities for employees.
- For transit riders: all of the above plus safe, sheltered transit stops with convenient access to building entrances.
- For bicyclists: theft-proof and well-lighted bicycle storage facilities with convenient access to building entrances, onsite bikeways between buildings or uses; shower and locker facilities.
- For carpools and vanpools: preferential parking.

- Provide onsite services to reduce the need for offsite travel. Examples include:
  - For residential developments: include childcare, coworking spaces, neighborhood retail stores, postal machines, and automatic teller machines.
  - For mixed use projects involving commercial/office developments: include childcare, food service, postal machines, and banking services.
- Provide onsite services to encourage alternative transportation modes, including, but not limited to, rideshare matching, transit subsidies, vanpool subsidies, shuttle services, parking management, guaranteed ride home, and education.
- Schedule operations to reduce trips during highly congested periods, including, but not limited to, adjusted business hours, allow alternative work schedules, and schedule deliveries for off-peak hours.
- Provide offsite transit services, bikeway, and pedestrian enhancements serving the project.

  Plan Requirements and Timing: Applicants shall prepare and provide technical assessment evaluating operational air quality impacts, as well as demonstrate feasible mitigation measures to reduce impacts, consistent with County and SBCAPCD methodologies to the County for review and approval before issuance for grading or building permits. Mitigation shall be incorporated into the design and shall be noted on all grading and building plans before the issuance of grading permits. Implementation of measures shall be demonstrated before issuance of certificate(s) of occupancy.

  Monitoring: County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite.

MM AQ-4: Project Siting and Interior Air Quality Protection. Applicants of housing sites located within 500 feet of U.S. Highway 101, as measured from the road right-of-way boundary of U.S. Highway 101, located between the segment of U.S. Highway 101 between the junction of SR 154 and the junction of SR 217 shall site residential development outside of the 500-foot limits to the maximum extent feasible. Where development cannot feasibly be sited outside of the 500-foot limits, applicants shall be required to incorporate project design measures, which as an example could include any one or more of the following:

- Installation of heating, ventilation, and air conditioning (HVAC) infrastructure within the building to circulate and purify outdoor air sources sufficiently to reduce diesel particulate matter and vehicle emissions. HVAC control systems shall include an air filtration system, such as the Lennox PureAir system, with particulate filters that have a minimum efficiency reporting value (MERV) of 12 for enhanced particulate removal efficiency capable of removing a significant portion of the

sub-1.0 micrometer-sized particles expected from diesel combustion as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.

- Avoidance of operable windows on the side of the building facing U.S. Highway 101.
- Incorporation of dual-pane windows on all windows to make the building exterior as "airtight" as possible to minimize air infiltration. The exterior pressure envelope of the units should be sealed to achieve a tested air leakage rate of no more than 3.0 unit volumes per hour using the blower door ACH50 leak test, or equivalent.
- Location of any vents and roof penetrations or other air intakes facing away from U.S. Highway 101 wherever possible. Doorways and entryways should also be located away from U.S. Highway 101 to the extent feasible.
- Though not required, location of outdoor areas away from U.S. Highway 101 (e.g., behind thick vegetation screens or within the interior courtyard portions of the development).

The applicant shall be responsible for demonstrating the effectiveness and feasibility of the proposed measures.

Plan Requirements and Timing: These control measures shall be noted on all grading and building plans before the issuance of grading permits. Implementation of measures shall be demonstrated before issuance of certificate(s) of occupancy.

Monitoring: County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite.

3.3.4.5 Secondary Impacts

Implementation of required mitigation measures would not result in any secondary impacts.

3.3.4.6 Residual Impacts

Impact AQ-1. The proposed uses and related development enabled under the proposed Project would be inconsistent with regional growth projections. However, the Housing Element Update would not be inconsistent with the overall goals and policies of the Connected 2050 RTP/SCS, Ozone Plan, or Land Use Element-Air Quality, and impacts would be *insignificant*.

Impact AQ-2. Implementation of **MM AQ-1** would require that construction activities associated with ministerial housing projects permitted under the Housing Element Update implement measures to control PM_{10} and fugitive dust emissions generated during all stages of site construction. Implementation of **MM AQ-1** and **MM AQ-2** would ensure that future construction projects enabled under the proposed Project would not generate PM_{10} emissions that would generate or contribute to a violation of federal and state air quality standards, or violate existing SBCAPCD rules. With the implementation of **MM AQ-1** and **MM AQ-2**, construction impacts associated with the proposed Project would be reduced to *significant but mitigable.* Implementation of **MM AQ-3** and **MM T-1** would ensure that the operation of individual development projects does not result in significant long-term operational emissions in exceedance of adopted thresholds by implementing a mix of measures to reduce area, energy, and mobile-source emissions generated from larger development projects exceeding SBCAPCD screening criteria. While implementation of these measures would be considered

sufficient to reduce impacts on a project-by-project basis, the combined cumulative effect of the operation of all housing development enabled under the proposed Project is still very likely to exceed County and SBCAPCD thresholds, largely due in part to the absence of plan/program-level thresholds applicable to projects such as the Housing Element Update. Therefore, the long-term operational impacts of the proposed Project, even after implementation of mitigation addressing impacts from individual development projects, would remain *significant and unavoidable.*

Impact AQ-3. MM HAZ-1 would require the preparation of a project-specific Phase I ESA for any vacant, commercial, agricultural, or industrial site before the renovation, demolition, grading, or building permit approval. The Phase I ESA would be required to identify any Recognized Environmental Conditions, which include structures containing ACMs and/or LBPs, and identify necessary remedial activities to reduce risks associated with the development of the site. Implementation of **MM HAZ-1** would eliminate or reduce potential adverse effects associated with the release of fugitive dust containing ACMs or LBPs. Therefore, with the implementation of **MM HAZ-1**, impacts would be *significant but mitigable.* Consistent with SBCAPCD's recommendations for reducing potential health impacts associated with the location of sensitive uses within 500 feet of U.S. Highway 101, **MM AQ-4** would require that housing sites located within 500 feet of the segment of U.S. Highway 101 located between the junction of SR 154 and the junction of SR 217, residential development should be sited to be located a minimum of 500 linear feet from the road right-of-way boundary of U.S. Highway 101 to the maximum extent feasible. If development cannot be sited greater than 500 feet from U.S. Highway 101, **MM AQ-4** would require that additional design features be implemented to reduce exposure to highway-related TACs. With the implementation of **MM AQ-4**, Project impacts would be *significant but mitigable.*

Impact AQ-4. Development enabled under the proposed Project would not generate odors substantially perceptible by sensitive receptors and impacts associated with the generation of objectionable odors would be *insignificant*.

Section 3.4
Biological Resources

3.4.1 Introduction

This section describes potential impacts on cultural and tribal cultural resources that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). Biological resources addressed in this section include special-status species, sensitive habitats, wetlands, and wildlife movement corridors. This section also discusses consistency with biological resources policies and regulations adopted by the County related to Environmentally Sensitive Habitat (ESH), Riparian Corridors, oak (*Quercus* spp.) trees, and other local resources.

3.4.2 Environmental Setting

This section discusses existing conditions related to biological resources in Santa Barbara County. Given the programmatic nature of this Environmental Impact Report (EIR), no site-specific biological surveys have been conducted. Rather, the description of the environmental setting is based on information provided in previous long-range planning documents, recent EIRs prepared by the County, and associated technical studies. This discussion also references the results of countywide queries of the U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Consultation (IPaC) database and California Department of Fish and Wildlife (CDFW) California Natural Diversity Data Base (CNDDB), as well as literature describing habitat requirements and distributions of special-status plant and wildlife species in the county (Appendix D). Additionally, the USFWS National Wetland Inventory (NWI) was used to identify potential wetland habitats throughout the county.

While these sources indicate the presence of sensitive biological resources throughout the county, they have not been recently ground-truthed. As such, available biological resources data is presented countywide and regionally, rather than in relation to individual housing sites identified in the sites inventory prepared by the County for the Housing Element Update. The accuracy of the desktop research and available countywide data is limited by the various collection methods (ranging from site-specific surveys to aerial imagery and remote sensing) and age (in some cases, data was collected back nearly 40 years). Unlike other natural resources (e.g., cultural resources, geologic formations, soils), which can remain in place indefinitely if undisturbed, sensitive biological resources, including special-status species and their habitats, are dynamic and can expand or contract in range due to a variety of natural and anthropogenic factors. Therefore, the regional data sources referenced in this analysis are not reliable on a site-specific basis

3.4.2.1 Existing Biological Resources

As described in Section 2.2.2, *Unincorporated County and Housing Market Areas*, this Program EIR recognizes five Housing Market Areas (HMAs) geographically delineated for regions in Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and the South Coast. Again, due to the large size and biological diversity of the unincorporated county, the discussion of biological resources is

addressed regionally with a focus on the areas where future residential and mixed use development would be enabled under the Housing Element Update based on the County's sites inventory (e.g., Eastern Goleta Valley in the South Coast and the Orcutt in the Santa Maria Valley).

Santa Maria Valley

The Santa Maria Valley is formed by the Santa Maria River to the north and the Casmalia and Solomon Hills to the south, creating a wide valley that opens towards the Pacific Ocean. It includes the unincorporated communities of Orcutt, Casmalia, Garey, and Sisquoc.

While much of the Santa Maria Valley has been developed with agriculture and/or urban development, dune scrub, coastal sage scrub, wetlands, vernal pools, oak woodlands, and grasslands remain in undeveloped areas, particularly within the Solomon Hills and southwestern Orcutt. Extensive eucalyptus (*Eucalyptus* spp.) woodlands also occur within the Solomon Hills and the central portion of Orcutt.



The Solomon Hills in southern Orcutt support a range of sensitive habitats within existing undeveloped areas and designated open space.
Source: Santa Maria Times

The southern portion of Orcutt includes riparian communities along the creeks and drainages, central dune scrub and grassland at lower elevations, oak woodland on north-facing slopes and in canyons, coastal sage scrub and sandhill chaparral on the higher and drier slopes, and bishop pine forest, which includes the rare Lompoc yerba santa (*Eriodictyon capitatum*) on and near Graciosa Ridge interspersed among sandhill chaparral (County of Santa Barbara 1995). The mosaic of oak woodland, scrub, grassland, and riparian communities in southern Orcutt provides continuity with the pine forest, chaparral, and grassland ecosystem to the southeast in the Solomon Hills, and the riparian, oak woodland, scrub, grassland, and wetland communities through and beyond the urban area to the northwest. The diversity of this assemblage of contiguous plant communities is important because it provides habitat for a high diversity of plant and wildlife species, allows movement between communities, and enables these species to be capable of surviving extreme changes in the environment such as fire, flooding, and disease (County of Santa Barbara 1995).

The central, more developed portion of Orcutt contains central dune scrub, eucalyptus woodland, mixed woodland, grassland, and riparian communities along Orcutt Creek and the drainages originating in Pine Canyon and Graciosa Canyon. Although these areas are generally small, they provide a continuous stretch of habitat that is vital for plants and wildlife, linking the open lands of the Solomon and Casmalia Hills with the extensive grasslands and wetlands beyond the limits of Orcutt and the City of Santa Maria (County of Santa Barbara 1995).

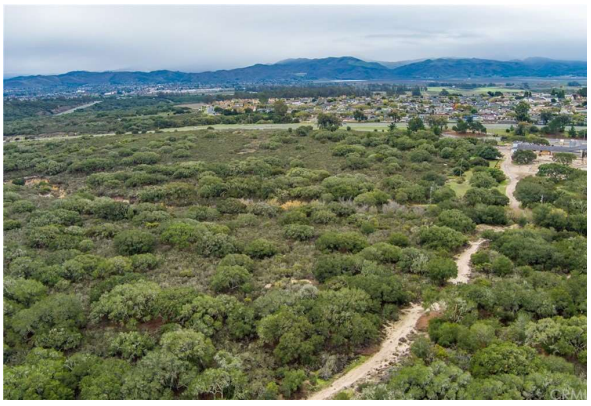
The western portion of Orcutt is relatively flat and dominated by grassland. Riparian communities occur along several unnamed drainages and Orcutt Creek and together provide another continuous stretch of habitat with connections to the more rugged and open lands of the Solomon Hills. A marshy meadow occurs between these riparian areas on Key Site 22. The dunes in the northeast corner of Key Site 22 support sandhill chaparral containing multi-trunked oak trees and several rare species. An

extensive vernal wetland/dune complex is located south and west of the Santa Maria Airport. This vernal wetland/dune complex is reported to be the best example of vernal wetlands in Santa Barbara County. It supports a diverse array of water-dependent birds, rare amphibians, and plants. The grasslands in western Orcutt provide ideal hunting opportunities for many species of raptors, including golden eagles (*Aquila chrysaetos*), loggerhead shrikes (*Lanius ludovicianus*), and white-tailed kites (*Elanus leucurus*), providing connectivity with the Casmalia Hills to the south. The Casmalia Hills are vegetated by grassland, oak woodland, and central coastal scrub (dominated by black sage [*Salvia mellifera*] and Lompoc monkeyflower [*Diplacus lompocensis*]). Small wetlands occur near the ridge of these hills.

Several special-status species inhabit the Santa Maria Valley with more limited distribution in Orcutt, including plants, such as seaside bird's-beak (*Cordylanthus rigidus* ssp. *littoralis*), Gambel's watercress (*Nasturtium gambelii*), and wildlife such as California tiger salamander (*Ambystoma californiense*), arroyo toad (*Anaxyrus californicus*), California red-legged frog (*Rana draytonii*), western snowy plover (*Charadrius nivosus nivosus*), least Bell's vireo (*Vireo bellii pusillus*), and vernal pool fairy shrimp (*Branchinecta lynchi*) (Table 3.4-3 in Appendix D). In addition, federally designated critical habitat for California red-legged frog, California tiger salamander, La Graciosa Thistle (*Cirsium loncholepis*), Lompoc Yerba Santa, tidewater goby (*Eucyclogobius newberryi*), and western snowy plover is present within the Santa Maria Valley (USFWS 2023; Table 3.4-1).

Lompoc Valley

Unincorporated areas within the Lompoc Valley contain extensive undeveloped open space and habitat areas associated with the Santa Ynez River corridor north of the City of Lompoc and the Burton Mesa Ecological Reserve near Purisima Hills surrounding the communities of Vandenberg Village, Mission Hills, and Mesa Oaks. The Santa Ynez River in this region is characterized by freshwater forested and shrub wetland habitats, with freshwater emergent wetland and riverine habitats, which support federally designated critical habitat for the federally endangered southwestern willow flycatcher (*Empidonax traillii extimus*) (USFWS 2023). Extensive stands of Burton Mesa chaparral habitat surround and occur on many remaining undeveloped lands within the unincorporated communities of Vandenberg Village, Mission Hills, and Mesa Oaks. Burton Mesa chaparral is a rare type of declining maritime chaparral habitat that supports many sensitive plant species such as rare manzanitas and ceanothus species. Some vacant infill properties such as those on Apollo Way in Vandenberg Village and Burton Mesa Boulevard in Mission Hills support relatively intact tracts of Burton Mesa chaparral and immediately border dense areas of this chaparral habitat within the state-owned Burton Mesa Ecological Reserve.



Several areas in Vandenberg Village and Mission Hills such as the vacant infill areas on Apollo Way (pictured above) support or border sensitive Burton Mesa chaparral habitat.
Source: Compass.com

Sensitive or special-status species expected to inhabit rural areas within the valley include the western spadefoot toad (*Spea hammondii*), tricolored blackbird (*Agelaius tricolor*), American

peregrine falcon (*Falco peregrinus anatum*), American badger (*Taxidea taxus*), silvery legless lizard (*Anniella pulchra pulchra*), and the southwestern pond turtle (*Actinemys marmorata*) (Table 3.4-4 in Appendix D). In addition, federally designed critical habitat for California red-legged frog, California tiger salamander, Lompoc Yerba Santa, southwestern willow flycatcher (*Empidonax trailli extimus*), and Vandenberg monkeyflower (*Diplacus vandenbergenis*) exist within the Lompoc Valley (USFWS 2023; Table 3.4-1).

Santa Ynez Valley

The Santa Ynez Valley is located in the central region of Santa Barbara County at the base of several converging mountain ranges, including the Santa Ynez Mountains and the San Rafael Mountains, as well as the Purisma Hills and the Santa Rita Hills. The Santa Ynez Valley includes pockets of urban development, including the unincorporated communities of Santa Ynez, Ballard, Los Olivos, and Los Alamos. Agricultural land uses, including ranches and grazing lands, irrigated row crops, and vineyards occur throughout the rural areas of the valley. Undeveloped land supporting natural habitats is present surrounding the urban development and agricultural lands and in larger, less fragmented concentrations further away from existing development.

The Santa Ynez River originates on the north slope of the Santa Ynez Mountains and the south slope of the San Rafael Mountains flowing from east to west through the Santa Ynez Valley, and emptying into the Pacific Ocean at Surf Beach near the City of Lompoc. The riverbed contains alternate channels that are vegetated by coastal and valley freshwater marshes. Vegetation within the floodplain consists of coast live oak riparian forest, central coast cottonwood-sycamore riparian forest, Central Coast arroyo willow riparian forest, and Central Coast riparian scrub (County of Santa Barbara 2009).



Biological resources in the Santa Ynez Valley are mainly associated with the Santa Ynez River and undeveloped rural lands. Areas within the urban boundaries of Santa Ynez, Los Olivos, Ballard, and Los Alamos are generally characterized by disturbed undeveloped land bordered by roadways, utilities, and fences.
Source: Google Earth

Plant communities within the Santa Ynez Valley include valley needlegrass grassland, non-native grassland, oak savanna and woodland, riparian forest and scrub, wetlands, buck brush chaparral, eucalyptus woodland, and coastal scrub (County of Santa Barbara 2009). The unincorporated community of Los Alamos, located on the western end of the Santa Ynez Valley, includes a reach of San Antonio Creek and its associated Riparian Corridor. Most of San Antonio Creek is located within a narrow strip of semi-rural land between the northern edge of the urbanized area and U.S. Highway 101 (County of Santa Barbara 2010b). The entire reach of San Antonio Creek within and adjacent to the unincorporated community of Los Alamos has been channelized for flood control purposes and most reaches are periodically cleared of vegetation. Native grasslands, wildflower fields, coastal scrub, oak woodland, oak savannah, and riparian woodlands have been increasingly fragmented or eliminated by agricultural conversion in this area. Most of the remaining grasslands and woodlands in the Los Alamos Valley, Purisima Hills, and Solomon Hills are used as rangeland, but

extensive portions of rangeland have been converted to vineyard production (County of Santa Barbara 2010b).

The habitats within the Santa Ynez Valley support a variety of special-status plants and wildlife, which include seaside bird's-beak, Vandenberg monkeyflower (*Diplacus vandenbergensis*), Santa Ynez false lupine (*Thermopsis macrophylla*), arroyo toad, foothill yellow-legged frog (*Rana boylii*), California red-legged frog, bald eagle (*Haliaeetus leucocephalus*), southwestern willow flycatcher, least Bell's vireo, tricolored blackbird, and Southern California steelhead (Table 3.4-5 in Appendix D). In addition, federally designated critical habitat for California red-legged frog, California tiger salamander, southwestern willow flycatcher, and vernal pool fairy shrimp (*Branchinecta lynchi*) exist within the planning area (USFWS 2023; Table 3.4-1).

Cuyama Valley

The Cuyama Valley is located between the Caliente Mountain Range to the north and the Sierra Madre Mountains to the south and is bisected by the Cuyama River. This area is sparsely populated with the small unincorporated communities of Cuyama, New Cuyama, and Ventucopa, which are located along the Cuyama River in the northernmost portion of the Cuyama Valley and on the eastern edge of the county. Together these three small unincorporated communities, provide several hundred homes and associated commercial development and public infrastructure in each community. Each of these communities is surrounded by rural agricultural lands (e.g., ranches, grazing lands, row crops) that occur on either side of the Cuyama River. Small tributaries to the Cuyama River also traverse these areas. Given the surrounding agricultural and rural residential uses, native vegetation along these tributaries is generally limited to a small number of trees and vegetation growing along the banks.



A small tributary of the Cuyama River bisects New Cuyama. However, the surrounding agricultural and rural residential land uses limit the extent of riparian vegetation.
Source: Google Earth

More extensive, unfragmented habitat is located to the southwest of these communities and associated agricultural land uses. Natural ecological communities in the Cuyama Valley include oak woodland, sage communities, chaparral communities, native and non-native grassland, riparian woodland, freshwater habitats, and perennial and ephemeral streams (County of Santa Barbara 2014).

There are several federally listed and state-listed plant and wildlife species in the Cuyama Valley, several of which are only found in this area (Table 3.4-6 in Appendix D). The Cuyama Valley also contains federally designated critical habitat for California jewelflower and San Joaquin wooly-threads. The Cuyama Valley has also been recognized by the National Audubon Society as an Important Bird Area. (USFWS 2023; Table 3.4-1).

South Coast Region



In Eastern Goleta Valley, sensitive oak or riparian woodlands follow creek corridors such as Atascadero Creek and Maria Ygnacio Creek, which converge near the South Patterson Agricultural Area.
Source: EdHat

Unincorporated areas of the South Coast region include the unincorporated communities of the Eastern Goleta Valley, Montecito, Summerland, Isla Vista, Toro Canyon, and Mission Canyon. These areas contain a range of habitats, including riparian woodlands along multiple creeks, coastal sage scrub, chaparral, oak and eucalyptus woodlands, and various types of wetlands. The foothill regions above Goleta, Santa Barbara, and Carpinteria are traversed by multiple drainages flowing from the Santa Ynez Mountains. These drainages support vegetated riparian corridors in foothill areas and commonly extend into urban areas. For example, Maria Ygnacio Creek and Atascadero Creek traverse the Eastern Goleta Valley to converge directly south of the South Patterson Agricultural Area at the Goleta Slough and empty to the Pacific Ocean at Goleta Beach County Park. Foothills slopes are characterized by coastal sage scrub in lower elevation areas and chaparral in mid to higher elevations, with oak woodland sand grasslands interspersed within these areas.

Within more urbanized areas, tracts of open grassland occur on level areas, with coastal sage scrub and oaks woodland habitats occupying sloping areas. Undeveloped hillsides commonly support mature oak woodland mixed with grassland and coastal sage scrub. Creek corridors, such as Atascadero Creek, provide riparian vegetation from the foothills through the urban areas. The Eastern Goleta Valley supports coast live oak and riparian woodlands along Atascadero Creek and Maria Ygnacio Creek within the South Patterson Agricultural Block. The Glen Annie Golf Course located north of the City of Goleta is traversed by one unnamed creek and is bordered by several areas of coastal sage scrub habitat and a perennial segment of Glen Annie/Tecolotito Creek and has a well-developed riparian corridor to the east (County of Santa Barbara 2015b).

The Eastern Goleta Valley Community Plan identifies ESH under a mapped overlay, including habitats such as riparian woodlands, monarch butterfly (*Danaus plexippus*) roosts, coastal sage scrub, chaparral where it supports rare or vulnerable native vegetation alliances or sensitive native plant or wildlife species, oak woodlands, vernal pools, native grasslands, wetlands, dunes, white-tailed kite foraging habitat, raptor and turkey vulture roosts, critical wildlife habitat and wildlife corridors (County of Santa Barbara 2015a).

There are several federally listed and state-listed plant and wildlife species on the South Coast (Table 3.4-7 in Appendix D). In addition, federally designated critical habitats for California red-legged frog, the federally listed and state-listed Gaviota tarplant (*Deinandra increscens* ssp. *villosa*), the federally endangered tidewater goby, the federally endangered Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*), and the federally threatened western snowy plover exists within the region (USFWS 2023; Table 3.4-1).

Table 3.4-1. Federally Designated Critical Habitat for Threatened and Endangered Species in Santa Barbara County

Common Name	Scientific name	Federal Status	Present in HMAs?
AMPHIBIANS			
California tiger salamander	*Ambystoma californiense*	Endangered	Santa Maria Valley Lompoc Valley Santa Ynez Valley
Arroyo toad	*Anaxyrus californicus*	Endangered	Santa Ynez Valley Cuyama Valley South Coast
California red-legged frog	*Rana draytonii*	Threatened	Santa Maria Valley Lompoc Valley Santa Ynez Valley Cuyama Valley South Coast
BIRDS			
California condor	*Gymnogyps californianus*	Endangered	Cuyama Valley
Western snowy plover	*Charadrius lexandrines nivosus*	Threatened	Santa Maria Valley South Coast
Southwestern willow flycatcher	*Empidonax traillii extimus*	Endangered	Lompoc Valley Santa Ynez Valley South Coast Cuyama Valley
Least Bell's vireo	*Vireo bellii pusillus*	Endangered	Cuyama Valley South Coast
FISH			
Tidewater goby	*Eucyclogobius newberryi*	Endangered	Santa Maria Valley Lompoc Valley South Coast
Steelhead – Southern California Distinct Population Segment (DPS)	*Oncorhynchus mykiss irideus*	Endangered	Santa Maria Valley Lompoc Valley Santa Ynez Valley Cuyama Valley South Coast
INVERTEBRATES			
Vernal pool fairy shrimp	*Branchinecta lynchi*	Threatened	Santa Ynez Valley Cuyama Valley
PLANTS			
Gaviota tarplant	*Deinandra increscens* ssp. *Villosa*	Endangered	Lompoc Valley South Coast
La Graciosa thistle	*Cirsium scariosum* var. *loncholepis*	Endangered	Santa Maria Valley Lompoc Valley
Lompoc yerba santa	*Eriodictyon capitatum*	Endangered	Santa Maria Valley Lompoc Valley
Vandenberg monkeyflower	*Diplacus vandenbergensis*	Endangered	Lompoc Valley
Ventura Marsh Milk-vetch	*Astragalus pycnostachyus* var. *lanosissimus*	Endangered	South Coast

Source: USFWS 2023.

3.4.2.2 Special-Status Species

As discussed in Section 3.4.2.1, *Existing Biological Resources*, Section 3.4.2.3, *Sensitive Habitats*, and Appendix D, habitats in the county support a diversity of special-status plant and wildlife species.

Special-status plant species include those that are:

- Listed or proposed for listing as threatened or endangered under the Federal Endangered Species Act (ESA) (50 Code of Federal Regulations [CFR] §17.12, and various notices in the Federal Register [FR] [proposed species]).
- Candidates for possible future listing as threatened or endangered under the Federal ESA.
- Listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (CESA).
- Candidates for possible future listing as threatened or endangered under CESA.
- Consistent with the definitions of rare or endangered under the California Environmental Quality Act (CEQA) (CEQA Guidelines Section 15380).
- Listed as rare under the California Native Plant Protection Act (California Fish and Game Code Section 1900 et seq.).
- Listed by the California Native Plant Society (CNPS) as California Rare Plant Ranks (CRPR) 1A, 1B, 2A, 2B, 3, or 4 (CNPS 2023).

Special-status wildlife species include those that are:

- Listed or proposed for listing as threatened or endangered under the Federal ESA (50 CFR §17.11, and various notices in the FR (proposed species).
- Candidates for possible future listing as threatened or endangered under the Federal ESA.
- Listed or proposed for listing by the State of California as threatened or endangered under CESA.
- Candidates for possible future listing as threatened or endangered under CESA.
- Species of special concern to CDFW.
- Species fully protected in California (California Fish and Game Code, Section 3511 [birds], Section 4700 [mammals], Section 5050 [amphibians and reptiles], and Section 5515 [fish]).
- Species that meet the definitions of rare or endangered under CEQA (CEQA Guidelines Section 15380).

According to the CNDDB, Santa Barbara County (excluding the Channel Islands) is known to contain 15 federally listed and 18 state-listed rare, threatened, or endangered wildlife species. In addition, the county contains 11 federally listed and nine state-listed rare, threatened, or endangered plant species (CDFW 2022). See Appendix D for a full list of special-status plant and wildlife species and their habitat requirements, organized by region.

Special-status wildlife species tend to occur within more extensive, unfragmented open spaces. Special-status birds (e.g., Swainson's hawk [*Buteo swainsoni*], tricolored blackbird, yellow warbler [*Setophaga petechia*]) generally occur within relatively narrow bands of riparian habitats; however, they may also occur as transients in urbanized areas as well. Additionally, some special-status birds (e.g., burrowing owl [*Athene cunicularia*]) can also occur within agricultural lands. Many of the

special-status amphibians and fish species that occur within the county use aquatic habitats immediately adjacent to existing urban development or agricultural land uses. Special-status plant species occur throughout the county, including within and adjacent to urban areas, but generally tend to be located within unfragmented areas with larger expanses of undisturbed native habitats.

3.4.2.3 Sensitive Habitats

The county contains several sensitive habitats designated by the federal government, the state, and/or the County.

Federally designated critical habitat is defined in Section 3(5)(A) of the Federal ESA as:

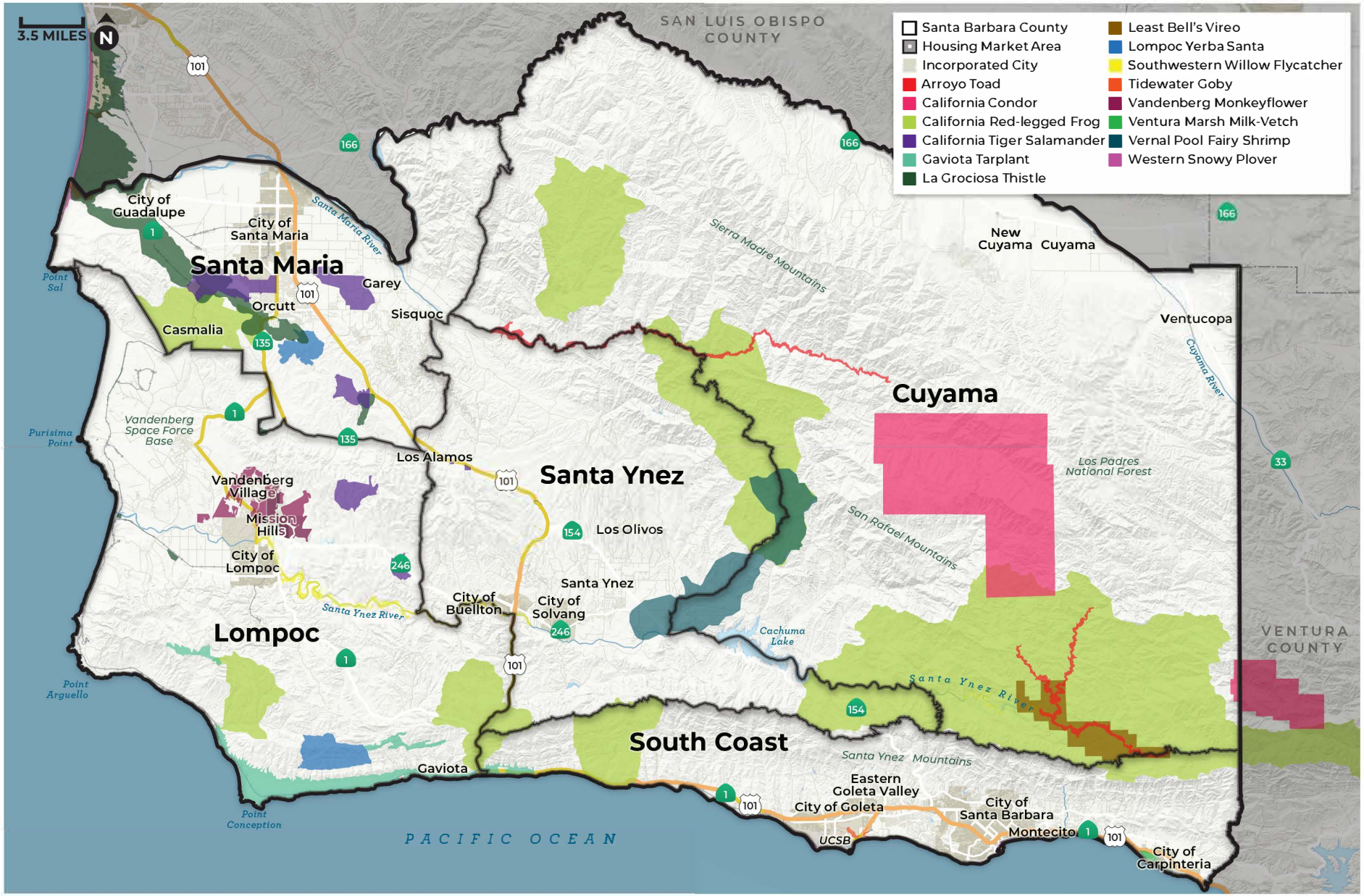
(i) The specific areas within the geographical area occupied by the species, at the time it is listed in accordance with the ESA, on which are found those physical or biological features essential to the conservation of the species and which may require special management considerations or protection; and

(ii) Specific areas outside the geographical area occupied by the species at the time it is listed, upon a determination that such areas are essential for the conservation of the species.

As described in Section 3.4.2.1, *Existing Biological Resources*, federally designated critical habitat has been designated within each of the five HMAs in the county. However, the majority of these areas are located away from the developed areas within larger unfragmented areas. Within the South Coast, federally designated critical habitat within the developed areas is generally limited to aquatic habitat for the endangered tidewater goby (e.g., within Atascadero Creek). Federally designated critical habitat for Vandenberg monkeyflower occurs within or near Vandenberg Village and Missions Hills in Lompoc Valley. Additionally, federally designated critical habitat for the La Graciosa thistle and California tiger salamander occurs within or near Orcutt in the Santa Maria Valley, and federally designated critical habitat for the vernal pool fairy shrimp occurs within or near unincorporated communities such as Santa Ynez in Santa Ynez Valley (USFWS 2023).

The California Coastal Act places a high priority on the protection of biological and natural resources. Strict limits are placed on development in Environmental Sensitive Habitat Area (ESHA)[1] within the Coastal Zone. Section 30107.5 of the California Coastal Act defines ESHA as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Very limited types of development are allowed in ESHA and then only where there is no feasible less environmentally damaging alternative and feasible mitigation measures have been adopted. In general, only land uses that are dependent on the habitat resources are allowable within ESHA.

[1] Note that environmentally sensitive areas are defined by the California Coastal Commission (CCC) as "environmentally sensitive habitat areas" or "ESHA" in the Coastal Zone and by the County as "environmentally sensitive habitat" or "ESH" in inland areas.



Santa Barbara County Federally Designated Critical Habitats

FIGURE 3.4-1



Santa Barbara County Environmentally Sensitive Habitats and Riparian Corridors in the South Coast

FIGURE 3.4-2

The County's Comprehensive Plan, including the Conservation Element, Open Space Element, Environmental Resource Management Element, Land Use Element, and Coastal Land Use Plan (CLUP), contains policies identifying the protection, preservation, and enhancement of biological and natural resources (Section 3.4.3, *Regulatory Setting*). These plans and policies promote the protection of important biological and natural resources and ensure that new development is compatible with these resources and the surrounding environment (County of Santa Barbara 2010a). Additionally, some County community plans include local definitions and development standards for ESH. ESH includes areas such as wetlands, intertidal areas, monarch butterfly habitats, streams, riparian corridors, native grasslands, and other native plant communities. Community plans establish goals and policies to avoid disturbance to sensitive resources within mapped ESH. These standards apply where ESH exists and may be affected during development projects. The County built upon these policies by identifying and mapping the approximate extent of ESH overlays in some communities, including on the South Coast in the Eastern Goleta Valley, Mission Canyon, Summerland, and Toro Canyon. Given the nature of the mapping, the ESH overlays serve as an indicator of potential ESH but may not reflect actual site-specific extents of biological resources.

3.4.2.4 Wetlands and Other Waters of the United States

As further described in Section 3.9, *Hydrology and Water Quality*, the county supports several major water bodies (e.g., the Santa Ynez River, Santa Maria River, Sisquoc River, Cuyama River, San Antonio Creek), as well as smaller streams and tributaries throughout the region. These water bodies support riverine and riparian habitats that support sensitive plants and wildlife in the county.

Riparian habitat occurs in and along the county's many creeks and streams, and arroyos, barrancas, and other types of drainages throughout the county. Riparian habitats protect stream banks from erosion, provide shade, and preserve water quality by filtering sediment and some pollutants from runoff before entering streams. As described in the County's Conservation Element, pursuant to Government Code §65302(d)(3) the County is required to provide a map that details rivers, creeks, riparian corridors, and other land areas which, "may accommodate floodwater for purposes of groundwater recharge and stormwater management." Riparian Corridors are mapped on the South Coast in Eastern Goleta Valley, Mission Canyon, Montecito, Summerland, and Toro Canyon (County of Santa Barbara 2010a).

All naturally occurring wetlands are considered to be significant biological resources because they provide a high number of functions in a generally dry, arid region, and because of their rarity within the region. Wetlands provide food, cover for protection against predators, and breeding habitat for organisms such as invertebrate larvae and amphibians. Mammals also use these habitats as a drinking water source, and some species may forage in wetlands. Wetland types found throughout the County include freshwater emergent wetland, freshwater forested/shrub wetland, freshwater pond, lake, slough, estuary, and riverine. Wetland habitats are regulated by the (USACE) pursuant to Section 404 of the Clean Water Act (CWA)[2], the Central Coast Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the CWA, and CDFW pursuant to Section 1600 of the California Fish and Game Code. Additionally, development within and adjacent to wetland habitats within the county is

[2] As described in Section 3.9, *Hydrology and Water Quality*, on May 25, 2023, the U.S. Supreme Court issued a ruling on *Sackett et ux. v. Environmental Protection Agency et al.* (598 U.S. ___ [2023]) that limits the jurisdiction of the CWA. Under this ruling, the U.S. Supreme Court held that the CWA's use of "waters" under Section 1362(7) refers only to "geographic[al] features that are described commonly as "streams, oceans, rivers, and lakes" and to adjacent wetlands that are "indistinguishable" from those bodies of water due to continuous surface connection.

subject to the County policies, as well as the California Coastal Commission (CCC) for development within the Coastal Zone.

In addition to wetland habitats, Santa Barbara County also has seasonal pools that contain standing water on an ephemeral basis. In some cases, seasonal pools contain emergent wetland vegetation. However, seasonal pools with shorter hydroperiods may contain few emergent wetland plant species and may be classified as vernal pools. Vegetation in these pools may be sparse and consist mainly of upland plant species or specialized vernal pool species. Puddles that form in road ruts or other anthropogenic areas can be considered seasonal pools. These areas can be important biologically because they can contain threatened and endangered species, such as vernal pool fairy shrimp, and provide habitat for a variety of aquatic invertebrates.

3.4.2.5 Wildlife Movement Corridors

Habitat linkages and wildlife corridors are suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Wildlife movement corridors or habitat linkages are critical to maintaining populations of plant and wildlife species. Wildlife corridors are typically bounded by urban areas or other areas unsuitable for wildlife. The fragmentation of large habitat areas into small, isolated segments reduces biological diversity, eliminates disturbance-sensitive species, restricts gene flow between populations, and may eventually lead to local extinctions of entire floral or faunal assemblages. Many land use planning guidelines now recognize the importance of protecting wildlife movement corridors and seek to retain major linkages wherever possible. However, defining precise corridor alignments and specific spatial and resource requirements can be problematic. The county and resource and conservation agencies consider wildlife movement corridors to be sensitive.

Depending on the species, wildlife movement corridors can vary from relatively narrow paths for movement between breeding and foraging areas to areas at the scale of mountain ranges or valleys for dispersal and migration. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Many of the major wildlife movement corridors are represented by the ESH and Riparian Corridor overlays, which have been mapped along substantial portions of the main waterways. For example, in Eastern Goleta Valley, Atascadero Creek serves as an important wildlife corridor because it connects Goleta Slough, More Mesa, Lower Maria Ygnacio Creek, and the San Marcos Foothills. Wylie Canyon, San Pedro Creek, Encina Creek, Fremont Creek, San Jose Creek, Maria Ygnacio Creek, San Antonio Creek, and San Roque Creek also support wildlife movement from the mountains to the ocean within undeveloped passageways.

Agricultural land uses occur throughout much of the county and many wildlife species may move through agricultural fields that connect areas of native vegetation. For example, California red-legged frogs and California tiger salamanders are known to use fields that are currently in agricultural production during dispersal and migration. These species move between aquatic habitats traversing through upland areas; they may remain in suitable terrestrial habitats for periods of several months to years. Juveniles disperse away from aquatic breeding sites, apparently without regard to habitat corridors such as riparian areas when in undeveloped landscapes. Therefore, aquatic and terrestrial breeding and migration areas are required for species conservation.

3.4.3 Regulatory Setting

Federal, state, and local regulations have been enacted to protect biological resources in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.4.3.1 Federal

Federal Endangered Species Act

Under the Federal ESA, it is unlawful to "take" any species listed as threatened or endangered. Take is defined as actions intended to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." An activity is defined as a take even if it is unintentional or accidental. Take provisions under the Federal ESA apply only to listed fish and wildlife species under the jurisdiction of USFWS and/or the National Oceanic and Atmospheric Administration, or National Marine Fisheries Service (NMFS). Consultation with USFWS or NMFS is required if a project "may affect" or result in the take of a listed species.

When a species is listed, USFWS and/or NMFS, in most cases, must officially designate specific areas as critical habitats for the species. Consultation with USFWS and/or NMFS is required for projects that include a federal action or federal funding if the project would modify designated critical habitat.

Clean Water Act Section 404

Under Section 404 of the CWA, USACE regulates the discharge of dredged or fill material into U.S. waters. U.S. waters are those waters that have a connection to interstate commerce, either directly via a tributary system or indirectly through a nexus identified in USACE regulations. In nontidal waters, the lateral limit of jurisdiction under Section 404 extends to the ordinary high water mark (OHWM) of a water body or, where adjacent wetlands are present, beyond the OHWM to the limit of the wetlands. The OHWM is defined as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear natural line impressed on the bank, shelving, changes in the character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area" (33 CFR §328.3). In tidal waters, the lateral limit of jurisdiction extends to the high tidal line or, where adjacent wetlands are present, beyond the high tidal line to the limit of the wetlands.

On May 25, 2023, the U.S. Supreme Court issued a ruling on *Sackett et ux. v. Environmental Protection Agency et al.* (598 U.S. ___ [2023]) that limits the jurisdiction of the CWA. Under this ruling, the U.S. Supreme Court held that the CWA's use of "waters" under Section 1362(7) refers only to "geographic[al] features that are described commonly as "streams, oceans, rivers, and lakes" and to adjacent wetlands that are "indistinguishable" from those bodies of water due to continuous surface connection. Specifically, under this ruling, to assert jurisdiction, a party must establish "first, that the adjacent 'body of water constitutes'…'water[s]' of the United States (i.e., a relatively permanent body of water connected to traditional interstate navigable waters); and second, that the wetland has a continuous surface connection with that water, making it difficult to determine where the 'water' ends and the 'wetland' begins."

Clean Water Act Section 401

Under Section 401 of the CWA, the State Water Resources Control Board (SWRCB) must certify all activities requiring a Section 404 permit. The Central Coast RWQCB regulates these activities and issues water quality certifications for those activities requiring a Section 404 permit by requiring a Section 401 Water Quality Certification. In addition, the Central Coast RWQCB has the authority to regulate the discharge of "waste" into Waters of the State pursuant to the Porter-Cologne Water Quality Control Act (Porter-Cologne).

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits actions that would result in a "take" of migratory birds, their eggs, feathers, or nests. Take is defined in the MBTA to include any attempt at hunting, pursuing, wounding, killing, possessing, or transporting by any means or in any manner any migratory bird, nest, egg, or part thereof. More than 800 species of birds are protected under the MBTA. Migratory birds are also protected, as defined in the MBTA, under Section 3513 of the California Fish and Game Code.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (BGEPA) makes it illegal to import, export, take (which includes molest or disturb), sell, purchase, or barter any bald eagle or golden eagle or parts thereof. USFWS oversees the enforcement of this Act. The 1978 amendment authorizes the U.S. Secretary of the Interior to permit the taking of golden eagle nests that interfere with resource development or recovery operations.

On September 11, 2009, USFWS announced a final rule on two new permit regulations that allow for the take of eagles and eagle nests under this Act. The permits authorize limited non-purposeful take of bald eagles and golden eagles, authorizing individuals, companies, government agencies (including tribal governments), and other organizations to disturb or otherwise take eagles in the course of conducting lawful activities, such as operating utilities and airports. Most permits issued under the new regulations would authorize disturbance. In limited cases, a permit may authorize the physical take of eagles but only if every precaution is taken to avoid physical take. Removal of eagle nests would usually be allowed only when it is necessary to protect human safety or the eagles.

Population information for both eagle species will guide USFWS in determining how many permits, including other types of permits USFWS already issued, or may be issued in any locality. Priority will be given to Native American requests for permits to take eagles (under existing regulations) where the take is necessary for traditional ceremonies. Because of the limited size of the bald eagle populations in the southwestern U.S., permits may not be available in all locations. Disturbance or take of golden eagles is likely to be limited everywhere in the U.S. because of potential population declines.

3.4.3.2 State

California Endangered Species Act

Under CESA, it is unlawful to "take" any species listed as rare, threatened, or endangered. Take under CESA means to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

CESA take provisions apply to fish, wildlife, and plant species. Take may result whenever activities occur in areas that support a listed species. Consultation with CDFW is required if a project would result in "take" of a listed species.

California Code of Regulations, Sections 250 and 251

Section 250 of the California Fish and Game Code states that "[e]xcept as otherwise authorized in these regulations or in the Fish and Game Code, resident game birds, game mammals, and fur-bearing mammals may not be taken at any time." Section 251.1 of the California Fish and Game Code states that "[e]xcept as otherwise authorized in these regulations or in the Fish and Game Code, no person shall harass, herd or drive any game or nongame bird or mammal or fur-bearing mammal. For the purposes of this section, harass is defined as an intentional act that disrupts an animal's normal behavior patterns, which includes, but is not limited to, breeding, feeding, or sheltering. This section does not apply to a landowner or tenant who drives or herds birds or mammals for the purpose of preventing damage to private or public property, including aquaculture and agriculture crops." Activities that result in the take or harassment of a nongame mammal may also be considered in violation of this code.

California Code of Regulations, Sections 1600–1616

CDFW, through provisions of Sections 1600-1616 of the California Code of Regulations, is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be substantially adversely affected. Streams (and rivers) are defined by the presence of a channel bed and banks and the conveyance of at least ephemeral flows. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. Section 1602 of the California Fish and Game Code requires any entity (e.g., person, state or local government agency, or public utility) that proposes a project that will substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake to notify CDFW of the project. In the course of this notification process, CDFW will review the project as it affects streambed habitats within the project area. CDFW may then place conditions in the Section 1602 Lake and Streambed Alteration Agreement (LSAA) to avoid, minimize, and mitigate any potentially significant adverse impacts within CDFW jurisdictional limits.

CDFW also has jurisdiction over any riparian habitat area associated with a river, stream, or lake. Riparian habitat includes willows, cottonwoods, and other vegetation typically associated with the banks of a stream or lake shoreline. In most situations, wetlands associated with a stream or lake would fall within the limits of riparian habitat. Thus, defining the limits of CDFW jurisdiction based on riparian habitat would automatically include any wetland areas. CDFW has not defined wetlands for jurisdictional purposes. Wetlands not associated with a lake, stream, or other regulated area are generally not subject to CDFW jurisdiction.

California Fish and Game Code Sections 3503, 3503.5, and 3513 – Protection of Birds, Nests, and Raptors

Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders *Falconiformes* and *Strigiformes*), including their nests or eggs. Typical violations of these codes include the destruction of active nests resulting from the removal of vegetation in which the nests are located. Violation of Section 3503.5

could also include failure of active raptor nests resulting from disturbance of nesting pairs by nearby project construction. This statute does not provide for the issuance of any type of incidental take permit. Section 3513 states that it is unlawful to take or possess any migratory nongame bird, as designated in the MBTA, or any part of such migratory nongame bird.

California Fish and Game Code – Additional Sections

Other applicable sections of the California Fish and Game Code include Section 2050 (CESA), Section 4150 (Nongame Animals), Section 5650 (prohibits water pollution), Section 5652 (prohibits refuse disposal in or near streams), Section 5901 (prohibits any device that impedes fish passage), and Section 5937 (requires sufficient water bypass and fish passage, relating to dams).

California Native Plant Protection Act

The California Native Plant Protection Act (CNPPA) preserves, protects, and enhances endangered and rare plants in California. Specifically, it prohibits the import, take, possession, or sale of any native plant designated by the CDFW Commission as rare or endangered, except under certain circumstances designated by the CNPPA.

California Native Plant Society (CNPS) Inventory

CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in California. The CNPS has compiled an inventory comprised of information focusing on geographic distribution and qualitative characterization of rare, threatened, and endangered vascular plant species of California. The list has served as a potential candidate list for listing as Threatened and Endangered by CDFW. The CNPS has developed five categories of rarity:

- CRPR 1A: Presumed extirpated in California and either rare or extinct elsewhere.
- CRPR 1B: Rare, threatened, or endangered in California and elsewhere.
- CRPR 2A: Presumed extirpated in California, but more common elsewhere.
- CRPR 2B: Rare, threatened, or endangered in California, but more common elsewhere.
- CRPR 3 : Plants about which we need more information – a review list.
- CRPR 4 : Plants of limited distribution – a watch list.

The CNPS appends CRPR categorizations with “threat ranks” that parallel the ranks used by the CNDDB, and are added as a decimal code after the CRPR (e.g., CRPR 1B.1). The threat codes are as follows:

- 1 – Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- 2 – Fairly endangered in California (20%–80% occurrences threatened)
- 3 – Not very endangered in California (less than 20% of occurrences threatened or no current threats known)

Porter-Cologne Water Quality Control Act (California Water Code Division 7)

Porter-Cologne seeks to preserve, enhance, and restore the quality of California's water resources. Porter-Cologne established the SWRCB and nine RWQCBs as the principal state agencies with the responsibility for controlling water quality in the state. The State of California regulates discharges of dredged and fill material to Waters of the State through its Water Quality Certification Program under the authorities of Porter-Cologne and CWA Section 401, a program that allows the state to ensure that activities requiring a federal permit or license comply with state water quality standards. The Water Quality Certification Program is the state's de facto wetland protection program. It protects all waters within the state's regulatory jurisdiction but has special responsibilities for wetlands, riparian areas, and headwater streams because these water bodies are not systematically protected by other state and regional board programs.

3.4.3.3 Local

County of Santa Barbara Comprehensive Plan

The County's Comprehensive Plan addresses the conservation, development, and use of natural resources. Consistency with these policies is discussed further in Section 3.10, *Land Use and Planning*.

Land Use Element

The Land Use Element of the County's Comprehensive Plan contains policies to protect sensitive biological resources. The land uses allowed within the Land Use Element, and depicted on land use maps, are to be used to guide the public and the decision-makers as to what uses are appropriate if and when development occurs. New development must generally be consistent with the Comprehensive Plan's biological resource policies. The Hillside and Watershed Protection Policies address development on slopes to minimize grading, disruption of natural vegetation, and erosion.

Hillside and Watershed Protection Policies

1. Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.

2. All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion, or other hazards shall remain in open space.

3. For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.

4. Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the

development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.

6. Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.

7. Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

Streams and Creeks Policies

1. All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.

Conservation Element

The County's Conservation Element describes the ecological communities within the county and provides recommendations regarding future land uses (County of Santa Barbara 2010a). The Conservation Element uses U.S. Forest Service (USFS) plant community distribution maps and topographical data for the purpose of indicating the presence of broad ecological zones. Within the mapped areas the County identifies: 1) the particular category of natural community; 2) the ecological value of that community; 3) the use which it can tolerate; and 4) the intensity of that use which it can tolerate. In general, the boundaries of an unusual or delicate habitat on County maps were drawn to include a buffer zone. Sometimes the surrounding zone was designated as tolerating low-intensity uses. Streams selected for preservation either had buffer zones drawn roughly 100 feet on each side, or the adjacent vegetation received a low classification for tolerance and intensity of use (County of Santa Barbara 2010a).

Open Space Element

The Open Space Element identifies areas within Santa Barbara County where natural resources such as wetlands, rare and endangered plant and wildlife communities, and shorelines and dunes occur.

Environmental Resources Management Element (ERME)

The Environmental Resources Management Element (ERME) presents the County's policies for air quality, biology, surface and groundwater resources, noise, and visual resources protection. The ERME summarizes the various environmental factors analyzed in the Conservation and Open Space Elements and identifies policies that define whether development is appropriate given the severity of constraints.

Community Plans

Santa Barbara County has 10 community or area plans. Each community or area plan contains goals, objectives, policies, action/programs, and development standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. A policy is a

specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed.

As described above in Section 3.4.2.3, *Sensitive Habitats*, several community plans include policies and development standards for ESH. For instance, relevant ESH policies from the Eastern Goleta Valley Community Plan are described below. Similarly, policies from the Montecito, Summerland, Mission Canyon, and Toro Canyon Plan community plans also address ESH. Redevelopment and new residential, or mixed use development proposed within these areas would be required to comply with the ESH policies and all relevant development standards.

Eastern Goleta Valley Community Plan

Policy ECO-EGV-5.1. Environmentally Sensitive Habitat (ESH) areas and Riparian Corridors (RC) within Eastern Goleta Valley shall be protected and, where feasible and appropriate, enhanced.

Policy ECO-EGV-5.5. (INLAND) Minimum Buffer Areas for ESH. The minimum buffer strip and setbacks from streams and creeks for development and activities within the ESH overlay that are regulated by the County Zoning Ordinances shall be as follows, except on parcels designated for agriculture in rural areas where Policy ECO-EGV5.6 shall apply:

- ESH areas within the Urban Area and EDRNs: a minimum setback of 50 feet from either side of top-of-bank of creeks or existing edge of riparian vegetation, whichever is further, shall be indicated on all site plans. Plans shall minimize ground disturbance and vegetation removal.
- ESH areas within the Mountainous-GOL zone district: a minimum buffer of 200 feet from the edge of existing riparian vegetation. Grading and vegetation removal within these buffers shall be restricted while not precluding reasonable use of a parcel.

Policy ECO-EGV-5.5. (COASTAL) Minimum Buffer Areas for Streams and Creeks. The minimum buffer strip and setbacks from streams and creeks for development and activities within the ESH overlay that are regulated by the County Coastal Zoning Ordinance shall be as follows:

- ESH areas within the Urban Area: a minimum setback of 50 feet from either top-of-bank of streams and creeks or existing edge of riparian vegetation, whichever is the furthest distance from the stream or creek. The setback shall be indicated on all site plans.

Policy ECO-EGV-5.7. (COASTAL) Minimum Buffer Areas for ESH. A minimum setback of 50 feet from the outer edge of all ESH habitats shall be required unless otherwise specified in the Local Coastal Program.

Policy ECO-EGV-5.8. (COASTAL) Resource dependent uses may be allowed in ESH where sited and designed to avoid significant disruption of habitat values. A resource dependent use is a use that is dependent on the ESH resource to function (e.g., nature study, habitat restoration, and public trails). Non-resource dependent development, including fuel modification, shall be sited and designed to avoid ESH and ESH buffer areas. If avoidance is infeasible and would preclude reasonable use of a parcel, then the alternative that would result in the fewest or least significant impacts shall be selected.

Coastal Land Use Plan (CLUP)

The CLUP lays out the general patterns of development throughout the coastal areas of the county. Its purpose is to protect coastal resources while accommodating land use development within the Coastal Zone.

Environmentally Sensitive Habitat Area Overlay Designation Policy 9-1: Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an ESHA shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All development plans, grading plans, etc., shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could adversely impact an ESHA may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.

Native Plant Communities Policy 9-35: Oak trees, because they are particularly sensitive to environmental conditions, shall be protected. All land use activities, including cultivated agriculture and grazing, should be carried out in such a manner as to avoid damage to native oak trees. Regeneration of oak trees on grazing lands should be encouraged.

Native Plant Communities Policy 9-36: When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion of native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees.

Santa Barbara County Land Use and Development Code

The County's Land Use and Development Code (LUDC), Chapter 35, Zoning, of the County Code, includes development standards protecting biological resources.

Chapter 14 Appendix A – Grading Ordinance Guidelines for Native Oak Tree Removal

The purpose of this regulation is to protect native oak trees and govern deciduous and live oak removals. It proposes a tiered system based on lot size and the number of trees removed to determine the applicable permits required. Tier 1 covers exempt tree removals, Tier 2 requires replanting, Tier 3 requires a management plan, and Tier 4 requires discretionary permit review from the County. The County Grading Ordinance applies to all private land outside of the Coastal Zone and urban boundaries.

Section 35.28.100 Environmentally Sensitive Habitat Overlay

Section 35.28.100 of the LUDC provides restrictions on development in areas with unique natural resources including sensitive plant and wildlife species and/or their habitats. The overlay is intended to:

1. Protect and preserve specified areas in which plant or wildlife species or their habitats are either rare or especially valuable because of their role in the ecosystem, and that could be easily disturbed or degraded by human activities and developments; and

2. Ensure that each project permitted in the overlay zone is designed and carried out in a manner that will provide the maximum feasible protection to sensitive habitat areas

Sections 35.28.100(B) and (C) describe the applicability of the overlay (e.g., description of how a determination of the ESH boundary is made during permit application review) and permit and processing requirements, respectively.

Section 35.28.170 Riparian Corridor – Goleta (RC-GOL) Overlay Zone

Section 35.28.170 of the LUDC identifies the Goleta (RC-GOL) overlay zone is applied within rural areas designated agriculture on the Comprehensive Plan maps for the Eastern Goleta Valley Community Plan area and Goleta Community Plan area to protect and preserve mapped Riparian Corridors that could be easily disturbed or degraded by development and other human activities. The overlay is also intended to maintain a continuous canopy of trees along each Riparian Corridor and protect the overall ecological integrity of the mapped stream system.

Sections 35.28.170(B) and (C) describe the applicability of the overlay and permit and processing requirements, respectively.

Chapter 35 – Zoning, Article IX – Deciduous Oak Tree Protection and Regeneration

The County Deciduous Oak Tree Protection and Regeneration Ordinance implements the goals and policies of the Santa Barbara County Comprehensive Plan that promote the protection of deciduous oak trees. Article IX identifies requirements for oak tree replacement if an oak tree removal permit is permitted, including requiring preparation of an Oak Tree Management Plan, replacing oak trees removed at a compensation ratio of 15 to 1, replacing trees with native nursery stock, planting saplings in suitable locations, and maintaining and protecting planted saplings. These regulations address deciduous oak tree removal in the inland rural areas of the county if such removal is not associated with development that requires a permit under Articles III or IV of Chapter 35 of the County Code. For the urban and coastal areas, community plans and the CLUP determine tree protection policies.

3.4.4 Environmental Impact Analysis

This section discusses the potential biological resource impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.4.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to biological resources if it would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

CEQA Guidelines Section 15206 states that a project is of statewide, regional, or area-wide significance if it has the potential to affect sensitive wildlife habitats substantially, including riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and threatened species, as defined by CEQA Guidelines Section 15380. CEQA Guidelines Section 15380(d) further provides that plant or wildlife species may be treated as rare or endangered even if it is not on one of the official lists (i.e., if it is likely to become endangered in the foreseeable future).

There are no adopted Habitat Conservation Plans or Natural Community Protection Plans applicable to residential or mixed use development within the unincorporated areas of the county. Therefore, CEQA Threshold (f) is not discussed further within this impact analysis. CEQA Thresholds (b) and (c) are discussed jointly in Impact BIO-2.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2021) indicates that the determination of impact is done on a case-by-case basis. Because of the complexity of biological resource issues, substantial variation can occur between cases. An assessment of impacts must account for both short-term and long-term impacts. Thus, the assessment must account for items, such as immediate tree removal and longer-term, more subtle impacts, such as interruption of the natural fire regime or interference with plant or animal propagation. Disturbances to habitats or species may be significant, as determined by substantial evidence in the record (not public controversy or speculation) if they affect significant resources in the following ways:

1. Substantially reduce or eliminate species diversity or abundance.
2. Substantially reduce or eliminate the quantity or quality of nesting areas.
3. Substantially limit reproductive capacity through losses of individuals or habitat.
4. Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources.
5. Substantially limit or fragment range and movement (geographic distribution or animals and/or seed dispersal routes).
6. Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.

There are many areas in the county where little or no importance is given to habitat, and it is presumed that disruption would not create a significant impact. Examples of areas where impacts on habitat are presumed to be insignificant include the following:

1. Small areas of non-native grassland if wildlife values are low.
2. Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies.
3. Areas of historical disturbance such as intensive agriculture.
4. Small pockets of habitats already significantly fragmented or isolated, and degraded or disturbed.
5. Areas of primarily ruderal species resulting from pre-existing man-made disturbance.

In addition to the criteria listed above, the following questions and factors are used in assessing the significance of project impacts on biological resources:

1. Size.
    - How much of the resource in question both on and off the project site would be impacted (percentage of the whole area and square footage and/or acreage)?
    - How does the area or species that would be impacted relate to the remaining populations off the project site (percentage of the total area or species population, either quantitatively or qualitatively)?
2. Type of Impact.
    - Would it adversely indirectly affect wildlife (e.g., light, noise, barriers to movement)?
    - Would it remove the resource or cause an animal to abandon the area or a critical activity (e.g., nesting) in that area?
    - Would it fragment the area's resource?
3. Timing.
    - Would the impact occur at a critical time in the life cycle of an important plant or animal (e.g., breeding, nesting, flowering periods)?
    - Is the impact temporary or permanent? If it is temporary, how long would the resource take to recover?
    - Would the impact be periodic, of short duration, but recur again and again?

Section D of the County's *Environmental Thresholds and Guidelines Manual* (2021) includes habitat-specific impact assessment guidelines, which provides additional impact assessment guidelines specific to several biological communities. The following summarizes the thresholds applied to different habitat types throughout the county.

1. **Wetlands.** The following types of project-created impacts may be considered significant:
    - Projects which result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species.
    - Projects which substantially interrupt wildlife access, use, and dispersal in wetland areas.

- Impacts to the hydrologic conditions of wetlands systems, such as the quantity and quality of run-off, etc.
- Substantial alteration of tidal circulation or decrease of tidal prism in coastal salt marsh habitats.
- Adverse hydrologic changes (e.g., altered freshwater input), substantial increase of sedimentation, introduction of toxic elements, or alteration of ambient water temperature in coastal salt marshes.
- Indirect impacts from construction activities near coastal marshes such as noise and turbidity on sensitive animal species, especially during critical periods such as breeding and nesting.
- Disruption of wildlife dispersal corridors in coastal salt marshes.
- Disturbance or removal of substantial amounts of coastal salt marsh habitats. Because of the high value and extremely limited extent of salt marsh habitat in the county, small areas of such habitat may be considered significant.
- Direct removal of a vernal pool or vernal pools complex.
- Direct or indirect adverse hydrologic changes to vernal pool habitats such as altered freshwater input, changes in the watershed area or run-off quantity and/ or quality, substantial increase in sedimentation, introduction of toxic elements or alteration of ambient water temperature.
- Disruption of larger plant community (e.g., grassland) within which a vernal pool occurs, isolation or interruption of contiguous habitat which would disrupt animal movement patterns, alter seed dispersal routes, or increase vulnerability of species to weed invasion or local extirpation.

2. **Riparian Habitats.** The following types of project-created impacts may be considered significant:
   - Direct removal of riparian vegetation.
   - Disruption of riparian wildlife habitat, particularly animal dispersal corridors and/or understory vegetation.
   - Intrusion within the upland edge of the riparian canopy (generally within 50 feet in urban areas, within 100 feet in rural areas, and within 200 feet of major rivers), leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion.
   - Disruption of a substantial amount of adjacent upland vegetation where such vegetation plays a critical role in supporting riparian-dependent wildlife species (e.g., amphibians), or where such vegetation aids in stabilizing steep slopes adjacent to the riparian corridor, which reduces erosion and sedimentation potential.
   - Construction activity which disrupts critical time periods (nesting or breeding) for fish and other wildlife species.
3. **Native Grasslands.** Project-created impacts may be considered significant if they result in the removal or severe disturbance to a patch or patches of native grasses greater than 0.25 acre, and that are clearly part of a significant native grassland or an integral component of a larger ecosystem.

4. **Oak Woodlands and Forests.** The following changes in habitat value and species composition may be considered significant:
    - Habitat fragmentation.
    - Removal of understory.
    - Alteration to drainage patterns.
    - Disruption of the canopy.
    - Removal of a significant number of trees that would cause a break in the canopy or disruption in animal movement in and through the woodland.
5. **Individual Native Trees.** Impacts to individual native trees may be considered significant if a project results in the loss of 10 percent or more of the trees of biological value on a project site.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for the lower- and moderate-income affordability levels. The programmatic analysis provided by this EIR addresses the potential for the Housing Element Update to directly or indirectly affect biological resources within the unincorporated areas of the county, particularly within areas mapped by the County, state, or federal resource agencies as having known potential to support sensitive habitats or special-status species.

Impacts on biological resources would be unique to individual residential and mixed use developments on specific sites. The sites inventory provided as part of the Housing Element Update indicates where housing developments may occur under the proposed Project and informs this environmental impact analysis. The biological resources impact assessment generally compares the location of potential residential and mixed use developments to the location of known biological resources or areas with a high potential for biological resources. However, as noted above, a complete analysis of potential site-specific impacts is not possible as site-specific development plans and site-specific biological resource assessments are generally unavailable. This is because precise quantification of potential impacts (e.g., native vegetation or tree removal) is not possible as no site-specific development plans are available, and mapping of community-wide or regional resources is often necessarily high-level and in many cases outdated. The analysis also addresses both onsite and offsite impacts, which may occur due to the disruption of wildlife migration corridors, habitat fragmentation, and secondary impacts associated with changes in drainage patterns (e.g., creek alterations), or other actions, such as onsite or offsite vegetation clearance for wildfire hazard reduction (Section 3.16, *Wildfire*). Wherever possible, illustrative examples of sites are provided to describe particular types of habitats or special-status species that could be impacted where the implementation of the Housing Element Update could impact such resources.

This Program EIR also analyzes any potential impacts associated with the future implementation of the Housing Element Update's programs and policies. For example, Program 1 of the Housing Element Update (Adequate Sites for RHNA and Monitoring of No Net Loss) identifies that the County would revise development standards to ensure maximum densities can be achieved on rezone sites. These

revisions may reduce the County's ability to require avoidance and setbacks from onsite resources. The proposed Project would also allow for by right housing projects with 20 percent of the units affordable to lower-income households and zoned at a residential density allowing at least 20 du/ac, consistent with state law (Program 2, Use by Right Approval, of the Housing Element Update). These projects would not require any additional CEQA review and would be subject solely to ministerial review and compliance with quantifiable and objective standards according to state housing law. As such, by right development could limit the County's ability to negotiate conditions of approval through site plan review and enforce discretionary modifications, which may potentially restrict the County's ability to create and impose complex biological resource mitigations through a discretionary review. Program 1 also directs County staff to amend the zoning ordinances to allow a project applicant for a housing project to request a lower density (i.e., fewer units) than the specified minimum density when physical, environmental, infrastructural, or other constraints preclude a project from meeting the specified minimum density. Additionally, pursuant to Government Code Section 65589.5(d), the County could disapprove a housing project or impose a condition that the housing project be developed at a lower density on the grounds of a specific, adverse impact upon the public health or safety, if there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact; however, given that the presence of sensitive biological resources does not necessarily present a public health and safety concern or a physical constraint to potential site development, it remains unclear to what extent these resources would be seen as precluding a project from meeting the specified minimum density.

To evaluate the potential for secondary impacts associated with flooding and associated potential flood control improvements impacts on biological resources, this section cross-references information regarding the hydrologic setting and impacts as described in Section 3.9, *Hydrology and Water Quality.* To evaluate secondary impacts associated with wildfire and associated potential vegetation clearing for fire protection and potential impacts to biological resources, this section cross-references information regarding the wildfire setting and impacts as described in Section 3.16, *Wildfire.* To evaluate secondary aesthetic impacts associated with potential vegetation clearing for fire protection and the potential for increased building heights to maintain planned densities while protecting biological resources, this section cross-references information regarding the aesthetic setting and impacts as described in Section 3.1, *Aesthetics and Visual Resources.*

The analysis presented in this section is based on available long-range planning documents and agency resource mapping, available EIRs, and related technical studies. This programmatic analysis is supported by the review of existing adopted plans, public databases, and recent studies, that identify such resources including the County's Comprehensive Plan as well as the 1993 Goleta Community Plan, 2015 Eastern Goleta Valley Community Plan, 1997 Orcutt Community Plan, and 2009 Santa Ynez Community Plan. In particular, the community plans and associated EIRs often provided some level of site-specific analysis for several potential housing sites identified in the Housing Element Update as well as relatively detailed resource mapping in support of resource protection overlays. Specifically, the 1993 Goleta Community Plan and 2015 Eastern Goleta Valley Community Plan include inland urban area ESH and rural area Riparian Corridor overlays that indicate potential resources within some potential housing sites.

3.4.4.2 Project Impacts

Table 3.4-2 below provides a summary of the proposed Project's impacts related to biological resources. A detailed discussion of each impact follows.

Table 3.4-2. Summary of Biological Resources Impacts

Biological Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact BIO-1. The proposed Project could impact ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities.	Potentially significant	MM BIO-1 (Tree Protection Plan) MM BIO-2 (Habitat Protection Plan)	Significant and unavoidable impacts
Impact BIO-2. The proposed Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS.	Potentially significant	MM BIO-1 (Tree Protection Plan) MM BIO-2 (Habitat Protection Plan)	Significant and unavoidable impacts
Impact BIO-3. The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	Potentially significant	MM BIO-2 (Habitat Protection Plan) MM BIO-3 (Wildlife Movement Plan)	Significant and unavoidable impacts
Impact BIO-4. The proposed Project could conflict with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources.	Potentially significant	None feasible	Significant and unavoidable impacts
Cumulative impacts	Potentially significant	MM BIO-1 (Tree Protection Plan) MM BIO-2 (Habitat Protection Plan) MM BIO-3 (Wildlife Movement Plan)	Significant and unavoidable impacts

Impact BIO-1. The proposed Project could impact ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities.

Future housing projects enabled under the Housing Element Update could result in disturbance within and adjacent to ESH, Riparian Corridors, wetlands, oak woodlands, and other sensitive habitats and natural communities, particularly within the unincorporated areas of Eastern Goleta Valley, Orcutt, Mission Hills, Vandenberg Village, and Santa Ynez Valley. New residential development within or adjacent to these areas could result in impacts on sensitive biological resources identified in Land Use, Open Space, and/or Conservation Elements of the County's Comprehensive Plan as well as applicable County community plans. In general, the majority of the potential housing sites identified in the sites inventory are infill sites within the Urban Area, although there are several potential rezone sites and vacant sites in the Rural Area. While there is some potential for sensitive biological resources to be present at urban infill development sites, undeveloped sites in the Rural Area typically provide

more habitat value and have higher concentrations of sensitive biological resources. As discussed further below, such impacts could include direct clearing and removal of sensitive habitats to accommodate new housing projects.

As described in Section 3.4.3, *Regulatory Setting*, the objectives and policies in the County Comprehensive Plan, community plans, LUDC, and CLUP require avoidance of impacts to sensitive biological resources. As described in the County's *Environmental Thresholds and Guidelines Manual* the County conducts preliminary site assessments and reviews of existing historical resource information (designated ESH areas, biological resource maps, reports, surveys, and CNDDB maps). County staff utilizes this information and the methodologies described in the County's *Environmental Thresholds and Guidelines Manual* to determine whether resources on a site are biologically valuable and whether a project may result in a significant impact on biological resources. In some instances, a biological survey of the site is required to determine the presence or absence of sensitive species and the value of habitat on and surrounding the project site and to identify potential project impacts and feasible measures that could be incorporated into the project design to avoid or minimize the potentially significant impacts (County of Santa Barbara 2021). These requirements would apply to all future development projects enabled under the Housing Element Update that would be subject to County permits and the County Planning and Development Department's (P&D's) project review and approval process. Adherence to these existing regulations when evaluating discretionary permit applications would address potential Project impacts on biological resources.

However, the Housing Element Update would enact special provisions for processing or approval of higher-density (i.e., 20 du/ac or more) affordable housing development projects that would not be subject to the County's discretionary permit requirements and procedures to mitigate cultural resource impacts. Specifically, under Program 2, Use by-Right Approval, certain housing development projects may be processed through a building permit process not subject to a development plan (DVP), conditional use permit (CUP), or other discretionary review or approval or environmental review under CEQA. Without these procedures requiring the investigation and mitigation of impacts on biological resources, there exists the likelihood that housing development projects on undeveloped sites may cause substantial adverse changes to mapped and unmapped resources.

For example, in Eastern Goleta Valley, future residential or mixed use development at Rezone Site No. 12 (St. Vincent's – East) could impact stands of mature oak trees or remnant/ regrown oak woodland and coastal sage scrub and create indirect impacts on habitats on the San Marcos Foothills Preserve, located immediately adjacent to the north, through increased human activity, exterior lighting, noise, and pressure for clearance of vegetation for the purposes of defensible space and wildfire protection. Similarly, the potential development of Rezone Site No. 13 (St. Vincent's – West) could impact extensive tracts of coastal sage scrub, portions of which are designated as ESH, as well as bordering undeveloped habitats on the County-owned campus to the west. Within Eastern Goleta Valley's South Patterson Agricultural Area, the development of Rezone Site No. 6 (Caird 2) could impact the riparian woodlands and designated ESH associated with Maria Ygnacio Creek and Atascadero Creek. Development of this potential rezone site could also affect east-west and north-south drainages that empty into Atascadero Creek, particularly if major flood control and drainage improvements are required or proposed. In the unincorporated area of the western foothills of Goleta, the development of Rezone Site No. 11 (Glen Annie) could impact riparian habitat, including riparian habitat within the Riparian Corridor Overlay along an unnamed drainage on the western portion of the site, the bordering perennial segment of Glen Annie Canyon and Tecolotito Creek, and onsite coastal sage scrub habitat.

In the North County, planned residential and mixed use development within Mission Hills could impact remnant onsite Burton Mesa chaparral vegetation. For example, the development of Rezone Site No. 33 (Fong 2), and to a lesser extent Rezone Site No. 32 (Fong 1), could impact remnant onsite Burton Mesa chaparral vegetation, as well as more intact habitats on adjacent County-owned land due to increased human activity, exterior lighting, and noise.

Planned residential and mixed use development, particularly in Orcutt and the Eastern Goleta Valley, could also impact riparian and wetland areas located in these communities. For example, Orcutt Creek crosses Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in central Orcutt. Similarly, Maria Ygnacio Creek and Atascadero Creek cross Rezone Site No. 6 (Caird 2) in the Eastern Goleta Valley. According to the USFWS NWI, several other potential housing sites overlap with other potential wetlands throughout the county (USFWS 2023).[3] For example, Rezone Site No. 24 (Key Site 26) in Orcutt has a small freshwater emergent wetland (0.11 acres) along its eastern border (USFWS 2023).

Depending on the scale and location of future development, construction activities could result in a loss of or temporary disturbance to onsite riparian habitat and/or wetlands. As described in Section 3.9, *Hydrology and Water Quality*, pollutants of concern that could be generated during construction and operational activities include sediment (from grading operations), trash (from construction crews), petroleum products (from construction equipment), and potentially hazardous materials (from uses such as lumber processing). Additionally, housing development would result in an increase in human activity, which could also affect downstream water quality (Section 3.9, *Hydrology and Water Quality*).

Future housing development enabled by the proposed Project would be required to adhere to local, state, and federal regulations pertaining to water quality standards, as applicable. Future developments enabled under the proposed Project that would disturb at least 1 acre would be required to adhere to the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (SWRCB Order No. 2012-0006- DQA) and would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) for construction activities. The SWPPP is required to identify best management practices (BMPs) that protect stormwater runoff and ensure avoidance of substantial degradation of water quality (Section 3.9, *Hydrology and Water Quality*). Further, any proposed residential or mixed use development within stream corridors would also require an LSAA. Some developments may also require a CWA Section 404 permit issued by USACE and/or a Section 401 Water Quality Certification issued by the Central Coast RWQCB.

The implementation of **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** could partially offset or reduce impacts to ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities. **MM BIO-1** would require that applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law include a Tree Protection Plan (TPP) for construction activities involving pruning, damage, or removal of native trees. These plans would protect native trees and require future

[3] The USFWS NWI maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Wetlands or other mapped features may have changed since the date of the imagery and/or field work. There may be differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

applicants to replace trees damaged or removed during construction. **MM BIO-2** would require that applications for these housing projects also include a biological resources study that identifies the presence of sensitive biological resources, including special-status species, nesting birds, federally designated critical habitat, ESH, Riparian Corridors, wetlands and other sensitive habitats and natural communities. Should sensitive biological resources be identified, the applicant shall be required to prepare and submit a Habitat Protection Plan (HPP) that identifies site-specific measures to avoid or reduce impacts on these resources. Nevertheless, it remains unclear if the implementation of **MM BIO-1** and **MM BIO-2** measures could effectively be utilized to fully protect sensitive habitats and natural communities. For example, typical mitigation strategies like avoidance and setbacks (e.g., up to 100 feet for riparian habitats) may be infeasible due to the location of these resources within any given project site as well as the mandates for maximum production of higher-density housing on County-owned sites and potential rezone sites. If development is otherwise infeasible, pursuant to Program 1 of the Housing Element Update the County could allow a project applicant to request a lower density (i.e., fewer units) than the specified minimum density; however, given that the presence of ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities does not necessarily present a public health and safety concern or a physical constraint to potential site development, it remains unclear to what extent these resources would be seen as precluding a project from meeting the specified minimum density. Therefore, impacts would remain *significant and unavoidable*.

Impact BIO-2. The proposed Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS.

Potential future development enabled by the Housing Element Update would involve the construction of a variety of new residential and mixed use development throughout the county, particularly in the unincorporated areas of the Eastern Goleta Valley, Orcutt, Mission Hills, Vandenberg Village, and Santa Ynez. As a result, residential and mixed use development could impact special-status species through a reduction in the number of species in the population or an impact on the habitat of such species, including rare, threatened, or endangered plants and wildlife. Increased human presence due to future residential and mixed use development enabled by the proposed Project could result in the loss or disruption of habitats that support the function and natural activities of special-status species. In some instances, increased human disturbance could also result in indirect harassment and/or predation or injury to special-status species. Impacts may also include potential for increased window collision mortality, road collision mortality, and predation by house pets. Other indirect impacts may include habitat modification, increased human/wildlife interactions, habitat fragmentation (Impact BIO-3), encroachment by exotic weeds, exterior lighting, noise, and/or changes in surface water flows and general hydrology due to development of previously undeveloped areas or required flood control or drainage improvements.

Future residential development enabled by the proposed Project has the potential to impact federally threatened or endangered species that occur throughout the county, particularly in undeveloped parcels located adjacent to larger unfragmented habitats. Many of these species would be unlikely to be directly impacted because potential future development sites are generally located within urbanized areas and would not overlap with habitats for sensitive species. However, according to the USFWS Critical Habitat Mapper, federally designated critical habitat for the endangered tidewater goby is mapped within Atascadero Creek immediately downstream of Rezone Site Nos. 5 (Caird 1),

6 (Caird 2), and 7 (Caird 3). Federally designated critical habitat for Vandenberg monkeyflower occurs within or near several housing sites within Vandenberg Village and Missions Hills, including Rezone Site No. 32 (Fong 1) and No. 33 (Fong 2) Additionally, federally designated critical habitat for the La Graciosa thistle and California tiger salamander occurs within or near a number of the housing sites within Orcutt (e.g., Rezone Site No. 23 [Key Site 16]) and federally designated critical habitat for the vernal pool fairy shrimp occurs within or near several housing sites within Santa Ynez (e.g., Rezone Site No. 35 [Chumash LLC]) (USFWS 2023).

Several housing sites border or are bisected by creeks that are known to or may support special-status species. Drainage or flood control improvements that may be necessary to support potential future residential or mixed use development could impact such species. For example, Maria Ygnacio Creek and Atascadero Creek traverse Rezone Site No. 6 (Caird 2). Development of this site could impact federally designated critical habitat for and limited populations of the federally endangered southern steelhead, federally endangered tidewater goby, and the CDFW species of special concern southwestern pond turtle. The designated floodway (e.g., area of high-velocity floodwaters) extends outside the confluence of these two creeks, while the 100-year flood plain extends far out onto this site. Any associated drainage or flood control improvements could directly impact such habitats. Rezone Site No. 11 (Glen Annie), located adjacent to a perennial reach of Glen Annie Canyon and Tecolotito Creek, could also create similar impacts associated with flood control improvements and importation of fill. In the North County, most sites do not border perennial streams, and although Rezone Sites No. 21 (Key Site 10) and No. 22 (Key Site 11) are bisected by Orcutt Creek, which provides some habitat for federally threatened California red-legged frog, CDFW species of special concern southwestern pond turtle, and some special status bird species.

A reduction in the number of any unique, rare, threatened, or endangered species or a restriction in their range, or an impact on their habitat would be considered a significant impact because these impacts could reduce the species' population to a level where it can no longer be sustained locally or regionally. Similarly, potential future development could also create impacts on other special-status species. Depending on where future housing would be constructed, the future development's precise design, which is unknown, and any off-site improvements, could result in the deterioration of existing fish or wildlife habitats for foraging, breeding, roosting, nesting, etc. Any substantial deterioration of existing fish or wildlife habitat for special-status species would be considered a significant and unavoidable impact because the habitat may no longer provide the necessary elements to sustain populations of such species.

As previously described, the objectives and policies in the County Comprehensive Plan, community plans, LUDC, and CLUP require avoidance of impacts to sensitive biological resources. Additionally, the County's *Environmental Thresholds and Guidelines Manual* describes the County's methodologies for determining whether resources on a site are biologically valuable, and whether a project may result in a significant impact on biological resources (County of Santa Barbara 2021). These requirements would apply to all future development projects enabled under the Housing Element Update that would be subject to County permits and the County P&D project review and approval process. Adherence to these existing regulations when evaluating discretionary permit applications would address potential Project impacts on archaeological resources.

However, the Housing Element Update would enact special provisions for processing or approval of higher-density (i.e., 20 du/ac or more) affordable housing development projects that would not be subject to the County's discretionary permit requirements and procedures to mitigate biological resource impacts. Specifically, under Program 2, Use by-Right Approval, certain housing development

projects may be processed through a building permit process not subject to a DVP, CUP, or other discretionary review or approval or environmental review under CEQA. Without these procedures requiring the investigation and mitigation of impacts on biological resources, there exists the likelihood that housing development projects on undeveloped sites may cause substantial adverse changes to mapped and unmapped resources.

MM BIO-2 (Habitat Protection Plan) would require that applications for these housing projects include a biological resources study that identifies the presence of sensitive biological resources, including federally listed, state-list species, and other special-status as well as their habitats. Should sensitive biological resources be identified, the applicant shall be required to prepare and submit an HPP that identifies site-specific measures to avoid or reduce impacts on these resources. Nevertheless, it remains unclear if **MM BIO-2** could effectively be utilized to fully protect special-status species. For example, typical mitigation strategies like avoidance and setbacks from special-status species habitat may be infeasible due to the location of these resources within any given project site as well as the mandates for minimum production of higher-density housing on County-owned sites and potential rezone sites. As previously described, if development is otherwise infeasible, pursuant to Program 1 of the Housing Element Update the County could allow a project applicant to request a lower density (i.e., fewer units) than the specified minimum density; however, given that the presence of special status species and/or their habitat does not necessarily present a public health and safety concern, it remains unclear to what extent these resources would be seen as precluding a project from meeting the specified minimum density. Therefore, impacts would remain *significant and unavoidable*.

Impact BIO-3. The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

The development of housing sites that are currently undeveloped could interfere substantially with native fish and wildlife movement due to habitat fragmentation and the creation of barriers to wildlife movement (e.g., fences or walls). Wildlife corridors within or adjacent to potential future development enabled under the proposed Project, such as creeks and riparian corridors, open native habitats, and water bodies could be disrupted or blocked by future residential development. For example, in the Eastern Goleta Valley, the development of Rezone Site No. 6 (Caird 2), which straddles the 150- to 200-foot-wide riparian corridor and broad, well-vegetated channel of Maria Ygnacio Creek, could disrupt or constrain an important wildlife corridor, particularly if substantial flood control or drainage improvements are required. Potential disruption of this corridor, which is part of the Atascadero Creek Greenway and connects undeveloped foothill lands with almost 1,000 acres of acres undeveloped open space on More Mesa, could interfere with wildlife passage for fish, amphibians, reptiles, and a range of mammals, potentially including endangered steelhead trout, southwestern pond turtle, deer, coyotes, and even occasional mountain lions. Development of the Rezone Site No. 6 (Caird 2) could also potentially impact wildlife passage along the Atascadero Creek corridor which connects these undeveloped lands and Maria Ygnacio Creek with habitats within the Goleta Slough ecosystem. In addition, migratory and nesting birds could be impacted due to future residential and mixed use development that includes the removal of vegetation along wildlife corridors. In the Goleta foothills, similar impacts could occur along Glen Annie Canyon and Tecolotito Creek with the development of Rezone Site No. 11 (Glen Annie). In North County, the development of Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) could impact wildlife passage along the

Orcutt Creek corridor, which is lightly developed and connects central Orcutt open lands with the Solomon Hills. Development of these sites may entail the importation of large amounts of fill and other flood control improvements that could substantially block or disrupt wildlife passage.

Depending on the location and design of future residential and mixed use developments enabled under the proposed Project, construction of new housing could result in the introduction of barriers, such as fencing, drainage, and flood control improvements that would restrict the movement of resident migratory fish or wildlife species. Increased human activity as well as new sources of light and noise spillover could disturb and displace wildlife transit corridors. The introduction of barriers to the movement of any resident or migratory fish or wildlife species would be considered a *potentially significant* impact. The deterioration of existing fish or wildlife habitat along such critical wildlife corridors would also be considered a potentially significant impact because obstacles to movement can disrupt population dynamics and gene flow between populations.

Many housing sites would likely involve substantial grading and site alteration. As described in Impact BIO-1 and Impact BIO-2 above, many future projects may be processed "by right," potentially increasing the difficulty of imposing discretionary modifications, such as creek setbacks and development clustering. **MM BIO-2 (Habitat Protection Plan)** would require that applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law determine the potential for the presence of sensitive biological resources. If there is potential for watercourses or native vegetation at a project site to serve as a wildlife corridor, the applicant shall be required to prepare and submit an HPP for County approval. Additionally, **MM BIO-3 (Wildlife Movement Plan)** would require that applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law determine the potential for the project site to support wildlife linkages. If the biologist determines that there is potential for the project site to serve as a wildlife corridor, the applicant shall be required to prepare and submit a Wildlife Movement Plan for County approval. Compliance with this mitigation measure could result in alterations to the proposed configuration of future residential and mixed use developments to avoid impacts to the movement of fish and wildlife. However, it remains unclear if the implementation of **MM BIO-2** and **MM BIO-3** could effectively be utilized to fully protect special-status species and their habitats (e.g., riparian corridors, wetlands, and sensitive natural communities). Therefore, even with compliance with applicable plans and policies and implementation of proposed mitigation, large-scale, high-density development and potential for reduced open space requirements would result in *significant and unavoidable* impacts.

Impact BIO-4. The proposed Project could conflict with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources.

As discussed in Impact BIO-3 above, the proposed Project could result in significant impacts on creek corridors protected by County policies due to the potential future importation of large amounts of fill and other flood control improvements that could raise potential policy conflicts with possible significant impacts to biological resources. For example, the development of Rezone Site Nos. 6 (Caird 2), 11 (Glen Annie), 21 (Key Site 10), and 22 (Key Site 11) would occur on or adjacent to sensitive habitat associated with creeks in Orcutt and Eastern Goleta Valley. Similarly, the development of Rezone Site Nos. 13 (St. Vincents West), 21 (Key Site 10), and 22 (Key Site 11) could impact coastal

sage scrub, oak woodland, and individual oak trees, which would potentially conflict with adopted policies. Further future potential development enabled by the proposed Project in communities without a community plan, such as Rezone Site No. 12 (St. Vincent's – East), could impact coastal sage scrub, oak woodland, and individual oak trees which have only limited or general policy protection in these areas. Development of housing sites in Vandenberg Village, as well as Rezone Site No. 33 (Fong 2), and to a lesser extent Rezone Site No. 32 (Fong 1), in Mission Hills could significantly impact both remnant and intact rare Burton Mesa chaparral habitats, though these communities also have limited or general policies in absence of a local community plan.

Chapter 15B of the County Code, Development Along Watercourses, prohibits development within 50 feet of the top of the bank of any watercourse, or within 200 feet from the top of the bank of any major rivers, unless said development has been previously approved and the necessary permits have been obtained for such development. In addition, community plans include policies and development standards for the protection of biological resources. Further, the CLUP, 1993 Goleta Community Plan, and 2015 Eastern Goleta Valley Community Plan include inland Urban Area ESH and Rural Area Riparian Corridor overlays. Such standards ~~typically~~ include minimum quantified creek setbacks (i.e.~~e.g.~~, 50 to 100 feet) from the top of the bank of creeks. However, other standards are sometimes more qualitative, including a typical statement within multiple County Plans that "oak tree shall be protected to the maximum extent feasible" or those requiring protection of coastal sage scrub. Such standards may not be considered sufficiently quantified or objective under state housing law, leaving sensitive habitats potentially subject to significant impacts.

The Hillside and Watershed Protection Policies in the Land Use Element of the County's Comprehensive Plan are designed to protect natural, topography, landforms, and water quality and could reduce impacts to biological resources, as they require minimizing cut, fill, and site preparation, and avoiding land clearing during the rainy season. Additionally, the Conservation Element and Open Space Element of the County's Comprehensive Plan contain broad conservation goals, measures, and language that may form a basis for protecting biological resources, especially in those areas without community plans. However, due to the strong pressure for residential and mixed use development under the Housing Element Update, such general language may not meet state housing law requirements that such standards be objective and quantifiable, leaving habitats throughout the County potentially vulnerable to significant impacts from future potential development. To comply with adopted County plans and policies, under the proposed Project, all applications for "by right" permits for future developments would be reviewed and approved by the Santa Barbara County Flood Control and Water Conservation District, County P&D, and the County Building Official. As discussed above in Impacts BIO-1, BIO-2, and BIO-3, the County may lack the flexibility to develop, refine, and adjust project-specific mitigation measures for projects permitted "by right." These projects would be processed ministerially, and broad County resource protection policies may not be applied to reduce impacts. Therefore, the proposed Project could conflict with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources and impacts would be considered *significant and unavoidable.*

3.4.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis,* the cumulative setting for the proposed Project involves a variety of long-range plans, policies, and initiatives as well as development projects (housing and non-housing related) in the unincorporated county and surrounding incorporated cities (Tables 3-6, 3-7, and 3-8; Appendix I). Impacts associated with the proposed Project along with

potential impacts from past, pending, and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects such as the Accessory Dwelling Unit (ADU) Ordinance Amendments, the Agricultural Enterprise Ordinance (AEO), and development and annexations proposed under the general plans and housing elements of several cities within the county, as well as individual development projects.

The proposed Project would result in cumulatively considerable impacts if, in combination with other cumulative past, pending, and current plans and projects, it would substantially increase impacts on biological resources. Included in the cumulative setting for the proposed Project is the housing element update for each of the eight incorporated cities within the county. Under each of these cumulative projects, each agency is planning for how to meet local housing needs and the RHNA plus the 15 percent buffer for lower- and moderate-income units assigned by the Santa Barbara County Association of Governments by identifying potential sites for new housing development, potential sites for rezoning to residential uses, as necessary, and implementing a variety of programs that would encourage or facilitate new residential development. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units. Other cumulative planning efforts are listed in Section 3.0.6, *Cumulative Impacts Analyses*, as well as Appendix D.

Some cities may consider the provision of new housing on undeveloped land that supports biological resources or which may be proximate to cities or linked to ecosystems impacted by the Housing Element Update. As discussed in Chapter 1, *Introduction*, the RHNA allocation for Santa Barbara County as a whole (unincorporated communities and incorporated cities) is 24,856 units across the jurisdictions. Provision of such housing would likely entail the development of hundreds of acres of currently undeveloped land such as the examples discussed above, some of which supports sensitive biological resources.

The proposed Project would result in cumulatively considerable impacts in combination with cumulative development under other County plans and projects and pending developments within cities as it would create substantial adverse direct and indirect impacts as discussed in Impacts BIO-1 through BIO-4 above. Such potential impacts would include habitat loss and modification, disruption or impacts to riparian and wetland habitats, or natural communities identified and/ or candidate, sensitive, or special-status species in local or regional plans, policies, or regulations. This may include habitats and species regulated by the USFWS and/or CDFW or wetlands regulated by USACE, Central Coast RWQCB, and/or CDFW. Impacts could include direct removal, filling, hydrological interruption for flood control or drainage improvements, or direct development which could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established migratory corridors or native wildlife nursery sites. Such future cumulative development could conflict with local policies or ordinances protecting biological resources.

Potential future development enabled under the Housing Element Update in the unincorporated county could result in site disturbance, grading, or site improvements, as well as population increases, which would result in potential direct habitat destruction, introduction of invasive species, and creation of barriers to wildlife movement. These activities, as well as the construction and operation of other cumulative development projects in the county, would increase overall impacts on declining sensitive habitats and special-status species.

As previously described, the objectives and policies in the County Comprehensive Plan, community plans, LUDC, and CLUP require avoidance of impacts to sensitive biological resources. Additionally,

the County's *Environmental Thresholds and Guidelines Manual* describes the County's methodologies for determining whether resources on a site are biologically valuable, and whether a project may result in a significant impact on biological resources (County of Santa Barbara 2021). These requirements would apply to all future development projects enabled under the Housing Element Update that would be subject to County permits and the County P&D project review and approval process. Adherence to these existing regulations when evaluating discretionary permit applications would address potential Project impacts on archaeological resources.

However, the Housing Element Update would enact special provisions for processing or approval of higher-density (i.e., 20 du/ac or more) affordable housing development projects that would not be subject to the County's discretionary permit requirements and procedures to mitigate cultural resource impacts. Specifically, under Program 2, Use by Right Approval, certain housing development projects may be processed through a building permit process not subject to a DVP, CUP, or other discretionary review or approval or environmental review under CEQA. Without these procedures requiring the investigation and mitigation of impacts on biological resources, there exists the likelihood that housing development projects on undeveloped sites may cause substantial adverse changes to mapped and unmapped resources.

Therefore, the residential and mixed use development planned for under the Housing Element Update would substantially contribute to cumulatively considerable impacts in combination with other future and pending developments. These cumulative impacts would be considered *significant and unavoidable*.

3.4.4.4 Proposed Mitigation

MM BIO-1. Tree Protection Plan. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval a TPP. The TPP shall be prepared by an arborist/biologist approved by County P&D and shall determine whether mature native trees are located on the project site. If the biologist finds that there are no mature native trees at the project site, they shall submit a memorandum describing these findings to County P&D for review. If mature native trees are present, the TPP shall determine whether avoidance, minimization, or compensatory measures are necessary.

The TPP shall include the following components:

Site Plan Component:

- All mature native trees shall be identified in the site plan.
- All ground disturbance and development shall be sited to avoid mature native trees to the maximum extent practicable as determined by the arborist/biologist.
- The location of all tree wells or retaining walls shall be located at least 6 feet from the dripline of all protected trees.
- The location of all paths (i.e., driveways, sidewalks, etc.) shall be located at least 25 feet from dripline areas. Only pervious paving materials (e.g., gravel, brick without mortar, turf block) shall be located within 6 feet of dripline areas.

Construction Component:

- Fencing of all trees to be protected shall be located at least 6 feet outside the dripline with chain-link (or other material satisfactory to the County) fencing at least 3 feet high, staked to prevent any collapse, and with signs identifying the protection area placed in 15-foot intervals on the fencing.
- Fencing/staking/signage shall be maintained throughout all grading and construction activities.
- Equipment storage (including construction materials, equipment, fill soil, or rocks), and construction staging and parking areas shall be located outside of the protection area.
- All trees located within 25 feet of buildings shall be protected from stucco and/or paint during construction.
- No irrigation shall occur within 6 feet of the dripline of any protected tree.
- The TPP shall require that the following activities shall be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat.
    - If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used.
- Grading shall be designed to avoid ponding and ensure proper drainage within the driplines of oak trees.

Tree Replacement Component:

- The replacement trees shall be a native species, planted at a 10:1 ratio for oak trees (15:1 for blue oaks or valley oaks), and a 2:1 ratio for other trees. The replanting location shall be shown on site plans.
- Species shall be from locally obtained plans and seed stock.
- The trees shall be gopher-fenced.
- The trees shall be irrigated with drip irrigation on a timer until established.
- The trees shall be weaned off of irrigation over a period of 2~~two~~ to 3~~three~~ years.
- No permanent irrigation shall occur within the dripline of any tree.
- If replacement trees cannot all be accommodated onsite, the licensee shall submit a plan for approval by the Planning and Development Department for replacement trees to be planted offsite.
- All new and replanted trees shall be protected from predation by wild and domestic animals and from human interference by the use of staked, chain link fencing, and gopher fencing during the maintenance period.

Plan Requirements and Timing: The TPP shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations for the protection of mature native trees are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted by the applicant on project plans and submitted to County P&D for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of mature native trees shall be printed on all building and grading plans.

Monitoring: County P&D shall ensure that the TPP is included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved TPP.

MM BIO-2. Habitat Protection Plan. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval an HPP. The HPP shall be prepared by a biologist approved by County P&D. The HPP shall first determine the presence of sensitive biological resources at a project site, including special-status species and their habitats, ESH, Riparian Corridors, wetlands, and other sensitive natural communities. If the biologist finds that there are no potential sensitive biological resources at the project site, they shall submit a memorandum describing these findings to County P&D for review. If resources are present, the HPP shall determine whether avoidance, minimization, or compensatory measures are necessary.

The HPP shall include the following components:

- A description of the location and extent of driplines and sensitive root zones for all vegetation to be preserved, locations of sensitive habitats with a detailed description of allowed disturbance, and depictions of original and new locations for replanted species.
- Depiction of approved development envelopes, equipment storage, construction staging, and parking areas.
- If sensitive habitats, watercourses, or riparian habitats occur within the project site, to the maximum extent feasible as determined by the biologist, the HPP shall identify a 100-foot buffer for ground disturbance and vegetation removal. The area shall be fenced with a fencing type and in a location acceptable to County P&D. Depiction of the type and location of protective fencing or other barriers to be in place to protect the habitat areas. Protective fencing/staking/barriers shall be maintained throughout all grading and construction activities.
- If a project site is located adjacent to sensitive habitats, watercourses, or riparian habitats, the project shall be landscaped with only native, non-invasive, or compatible species to the adjacent habitat.
- No alteration to stream channels or banks shall be permitted until the applicant demonstrates receipt of all authorizations from USACE, Central Coast RWQCB, and/or CDFW for any planned alteration to stream channels or banks.

- If any ground disturbances would occur during the nesting bird season (February – mid-September), the HPP shall include requirements for nesting bird surveys. Prior to any ground disturbing activity, surveys for active nests shall be conducted by a biologist approved by Count P&D following CDFW-approved protocols, no more than 10 days prior to the start of activities. The surveys shall be conducted around the entire project site to identify any nests that are present and to determine their status. Identified nests shall be continuously surveyed for the first 24 hours prior to any activities to establish a behavioral baseline. Once work commences, all nests shall be continuously monitored to detect any behavioral changes. If behavioral changes are observed, the work causing that change shall cease and CDFW shall be consulted for additional avoidance and minimization measures. A minimum no-disturbance buffer of 250 feet around active nests of bird species and a 500-foot no-disturbance buffer around the nests of raptors shall be maintained until the breeding season has ended, or until the biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Any variance from these buffers shall be supported by the biologist and CDFW shall be notified in advance of implementation of a no-disturbance buffer variance.

- The HPP shall require that the following activities be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat.

    - If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used.

- If it becomes necessary to disturb or remove any plants within the habitat area, or in the event of unexpected damage, specimens shall be boxed and replanted. If it is not feasible to replant, plants shall be replaced at a minimum using the standards of the County's Standard Habitat Restoration Plan. If replacement plants cannot all be accommodated onsite, a plan must be approved by County P&D for replacement plants to be planted off-site.

- Grading shall be designed to ensure that habitat areas have proper drainage during and after construction, per biologist recommendations.

Plan Requirements and Timing: The HPP shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations for the protection of sensitive biological resources are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted by the applicant on project plans and submitted to County P&D for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of sensitive biological resources shall be printed on all building and grading plans.

Monitoring: County P&D shall ensure that the HPP is included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved HPP.

MM BIO-3. Wildlife Movement Plan. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval a Wildlife Movement Plan. The Wildlife Movement Plan shall be prepared by a biologist approved by County P&D. The Wildlife Movement Plan shall first determine whether the project site has the potential to support wildlife linkages. If the biologist finds that there are no potential wildlife corridors traversing the project site, they shall submit a memorandum describing these findings to County P&D for review. If wildlife corridors are identified, the Wildlife Movement Plan shall analyze proposed fencing in relation to the surrounding opportunities for wildlife movement/migration, identify the type, material, length, and design of proposed fencing, and shall propose non-disruptive, wildlife-friendly fencing, such as post and rail fencing, wire fencing, and/or high-tensile electric fencing, to allow passage by smaller animals and prevent movement in and out of the project sites by larger mammals, such as deer. The evaluation and Wildlife Movement Plan shall also identify project design features that would reduce potential impacts and maintain habitat and wildlife movement.

Plan Requirements and Timing: The Wildlife Movement Plan shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations for the protection of wildlife corridors are reflected in project plans and permit requirements. All project design features and protection measures shall be graphically depicted by the applicant on project plans and submitted to County P&D for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of wildlife movement corridors shall be printed on all building and grading plans.

Monitoring: County P&D shall ensure that the Wildlife Movement Plan is included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved Wildlife Movement Plan.

3.4.4.5 Secondary Impacts

Implementation of **MM-BIO 1 (Tree Protection Plan), MM BIO-2 (Habitat Protection Plan), and MM BIO-3 (Wildlife Movement Plan)** would require the preservation of trees and shrubs, ESH, and habitat within Riparian Corridors to the maximum extent practicable. This could substantially reduce the developable acreage and, as a result, high-density housing projects (e.g., 20 to 40 units per acre) may need to propose taller multiple-story development projects of four stories or more to meet maximum and perhaps even minimum densities to achieve Housing Element Update goals, policies, and programs. Taller buildings could have secondary impacts associated with community character and land use compatibility as discussed more fully in Section 3.1, *Aesthetics and Visual Resources,* and Section 3.10, *Land Use and Planning*.

Depending on the coverage of native vegetation, ESH, and habitat within Riparian Corridors on a given project site, the requirements for the implementation of **MM BIO-1, MM BIO-2, and MM BIO-3** may conflict with the implementation of **MM HWR-1 (Flood Hazard Development Standards)** identified in Section 3.9, *Hydrology and Water Quality* and **MM WF-1 (Defensible Space Requirements)** identified in Section 3.16, *Wildfire*. These measures may require or otherwise lead to the removal of native vegetation for the purposes of modification of the floodway and the provision of defensible

space, both of which are in the interest of public safety. In practice, particularly for heavily constrained sites, County P&D staff will be required to balance the protection of sensitive biological resources with public health and safety requirements related to flooding and wildfire. These tradeoffs could reduce the effectiveness of **MM BIO-1, MM BIO-2, and MM BIO-3** in preserving native vegetation, ESH, and habitat within Riparian Corridors.

3.4.4.6 Residual Impacts

Impacts BIO-1 and BIO-2. Substantial site alteration and grading would result in the removal of trees, shrubs, and other native vegetation and could result in direct and/or indirect impacts on special-status species. **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** would require pre-construction surveys and the preparation of plans to avoid or reduce impacts on native vegetation that provides habitat for special-status species. However, typical mitigation strategies like avoidance and setbacks from special-status species habitat may be infeasible due to the location of these resources within any given project site as well as the mandates for maximum production of higher-density housing on County-owned sites and potential rezone sites. If development is otherwise infeasible, pursuant to Program 1 of the Housing Element Update the County could allow a project applicant to request a lower density (i.e., fewer units) than the specified minimum density; however, given that the presence of ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities does not necessarily present a public health and safety concern, it remains unclear to what extent these resources would be seen as precluding a project from meeting the specified minimum density. Therefore, impacts on such species would remain *significant and unavoidable*.

Impact BIO-3. Implementation of **MM BIO-3 (Wildlife Movement Plan)** would require the creation of a Wildlife Movement Plan for all residential and mixed use development on vacant and agricultural lands. While federal, state, and local requirements for riparian habitat and wetland protection may limit impacts to riparian corridors that facilitate wildlife movement, due to the potential for limitation of County require complete avoidance and setbacks it remains unclear if the implementation of mitigation measures could fully protect other wildlife corridors and movement. Impacts on such resources would remain *significant and unavoidable*.

Impact BIO-4. To comply with adopted County plans and policies, under the proposed Project, all applications for ministerial "by right" permits for future residential and mixed use developments would be reviewed and approved by the Santa Barbara County Flood Control and Water Conservation District, County P&D, and the County Building Official. However, as the majority of residential and mixed use development under the Housing Element Update would be processed as "by right," there is an inherent lack of certainty over which County plans and policies may be applied to reduce impacts. For example, As described in Section 3.4.4.5, *Secondary Impacts*, depending on the coverage of native vegetation, ESH, and habitat within Riparian Corridors on a given project site, the requirements for the implementation of **MM BIO-1, MM BIO-2, and MM BIO-3** may conflict with the implementation of **MM HWR-1 (Flood Hazard Development Standards)** identified in Section 3.9, *Hydrology and Water Quality* and **MM WF-1 (Defensible Space Requirements)** identified in Section 3.16, *Wildfire*. These measures may require or otherwise lead to the removal of native vegetation for the purposes of modification of the floodway and the provision of defensible space, both of which are in the interest of public safety. In practice, particularly for heavily constrained sites, County P&D staff will be required to balance the protection of sensitive biological resources with public health and safety requirements related to flooding and wildfire. Therefore, the proposed Project could foreseeably

conflict with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources and impacts would remain *significant and unavoidable.*

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Section 3.5
Cultural and Tribal Cultural Resources

3.5.1 Introduction

This section describes potential impacts on cultural and tribal cultural resources that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). Cultural resources are the tangible or intangible remains or traces left by prehistoric or historic peoples and typically include prehistoric and historic archaeological sites and the historic built environment, such as buildings or structures, or traditional cultural places or landscapes. Cultural and tribal cultural resources discussed in this section include three subcategories: 1) historic resources; 2) archaeological resources; and 3) tribal cultural resources, as follows.

1. **Historic resources** include buildings, structures, and objects of historic or aesthetic importance that amplify the local population's sense of community, enhance perceptions and enjoyment of the community, and provide an important measure of the physical quality of life. When a significant concentration of such resources occurs within a defined geographic space, a historic district may be defined.

2. **Archaeological resources** represent and document activities, accomplishments, and traditions of previous occupation, and link current and former inhabitants of an area. Archaeological resources may date from the historic or prehistoric period and include physical remains of the past, such as artifacts, manufacturing debris, dietary refuse, and the soils in which they are contained, or areas where prehistoric or historic activity measurably altered the earth.

3. **Tribal cultural resources** include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: 1) included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR); or 2) included in a local register of historical resources as defined in Public Resources Code (PRC) Section 21074. Tribal cultural resources may also include resources determined by the Lead Agency, at its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is considered a tribal cultural resource to the extent that the cultural landscape is geographically defined in terms of size and scope.

3.5.2 Environmental Setting

Santa Barbara County has a rich history of habitation dating back 11,000 to 12,000 years ago, including the region's first known habitants, the Chumash, a Native American tribe that continues to reside in the county today. Native habitation extended through European exploration periods, which began in 1542 with Juan Cabrillo's explorations and establishment of missions in the 1760s. Settlers claimed land in the county through the 1800s as part of the state's Gold Rush, expansion of ranching, and American industrialization, including commercial agriculture and tourism. Agriculture also

expanded rapidly in the county, which increased the growth of agricultural economies supported by landowners and immigrant populations. The prehistory and history of the county are summarized below.

3.5.2.1 Prehistory

Within the Santa Barbara Channel region, the Barbareño Chumash developed a highly complex social system during late prehistory. While it is clear that there are many differences between the Chumash groups living north and south of Point Conception and between the coast and interior areas of the county, there are some broad patterns of cultural change applicable to all regions.

Early Holocene/Paleocoastal Period (Prior to 6500 Before Present [B.P.])

Human inhabitation of the Santa Barbara County region is believed to have begun more than 12,000 years ago. Although early archaeological evidence is sparse, several discoveries have led to an understanding of the prehistory of the area. A fluted Clovis point fragment found near the coast on Hollister Ranch is estimated to be approximately 11,000 to 12,000 years old (Erlandson et al. 1987). Human presence became more widespread around approximately 9000 B.P. when these ancient residents inhabited the coast and exploited marine resources before the Milling Stone Period (6500 – 3500 B.P.). Very few of these "Paleocoastal" sites have been identified. This shortage could be due to relatively small populations and/or loss through erosion and other natural forces, including the increase in global sea levels. The Paleocoastal Period exhibited low population density and simple technology. Early populations appear to have subsisted largely on plants, shellfish, and vertebrate species, with artifact assemblages emphasizing flaked stone tools.

Milling Stone Period (6500 – 3500 B.P.)

The Milling Stone Period is defined by the prevalence of handstones and milling slabs, indicating a reliance on seeds and other plant foods. Milling stones called mutates and manos dated as old as 9000 B.P. have been found in abundance. These milling stones have been interpreted as evidence of a dietary shift to a focus on plant materials such as seeds and nuts, and may also be a sign of food storage capabilities (Glassow 1996). As such, it is believed that subsistence during the Milling Stone Period consisted of a mixture of plant foods, shellfish, and a limited array of vertebrate species. However, researchers working in other locations have reported differently on food preferences during the Milling Stone Period, which may reflect mobility between coastal and inland locations.

Assemblages from this era also contain hammerstones for making flaked tools and for resharpening milling surfaces, small anvils, bone fish gorges, stone sinkers, and other fishing technology. The number, size, and complexity of habitation sites increase dramatically at this time, and sites show substantial variability across the region. Well-developed middens have been associated with this period, suggesting more regular and continuous use of habitation sites; however, small ephemeral campsites marked by just a few handstones or other milling tools are also found during this time.

Archaeological sites within the period from 6,500 to 5,000 years ago are very limited, likely due to environmental changes (Glassow 1996; Lebow et al. 2001).

Early Period (3500 – 600 B.P.)

Cultural changes during the Early Period are thought to have occurred as a result of environmental shifts, rising sea levels, and an increase in the population base. Population densities appear to have

surged around 5,000 years ago. The response to these changes by people of this period is evidenced by sites that appear more settled, but not permanent, with an increase in specialized sites for resource procurement activities such as hunting, fishing, and plant material processing. As a result of the increased population, trade between regions expanded, as evidenced by the presence of exotic shell beads and obsidian materials. Like the Milling Stone Period, ground stone artifacts identified with the Early Period consist of handstones and milling slabs. Toward the end of the period mortars and pestles were added, probably indicating systematic exploitation of acorns. Notched projectile points and the atlatl (throwing stick) appear shortly thereafter as well.

Middle Period (600 B.P. – 1000 Anno Domini [A.D.])

The early Middle Period is defined by the continued specialization in resource exploitation, trade, and increased technological complexity. Fishing, sea mammal hunting, and acorn harvesting increased steadily during this time. Use of the single-piece shell fishhook appeared during this period, and by 800 years ago the bone-barbed harpoon, large contracting stem chert projectiles, and sewn plank canoe had all come into use (Erlandson 1993; Glassow, Wilcoxon, and Erlandson 1988; Glassow 1996; King 1990; Strudwick 1985). Scholarly opinions regarding the development of a definitively centralized and stratified society differ; however, most agree this cultural change took place late in the Middle Period. Microlithic blades also began to be found late in this period and are believed to have been used primarily to perforate shells. Smaller projectile points begin to be found from this period, indicating the use of bows and arrows in the region. Both fish and acorns continued to be primary sources of subsistence. The development of mass hunting techniques suggests population pressure on resource collection late in the period.

Middle-Late Transitional Period (1000–1250 A.D.)

The absence of imported obsidian after 1000 A.D. may reflect a change in trade relationships that is likely associated with a shift in settlement patterns. Middle-Late Transitional Period sites contain a mixture of earlier artifact types. However, the appearance of small leaf-shaped projectile points marks the arrival of the bow and arrow to the region. Although different evaluation methods have produced a different time frame for the development of chiefly status positions, craft specialization, and complex socioeconomic and political systems, profound changes in Chumash society, economy, and political organization began sometime during the Middle-Late Transitional and Late Periods.

Late Period (A.D. 1300–1769)

By the Late Period, Chumash culture was most likely very similar to that observed by the Spanish when they arrived. The southern Chumash had developed a complex religious, social, and economic system. Social and political structures continued to increase in complexity. Archaeological investigations indicate an increase in marine and terrestrial species in midden deposits less than 600 years old. The use of temporary camps for resource procurement also increased. Objects of material culture included a wide array of utilitarian and ornamental objects such as arrow points, small bead drills (microlithic blades), various mortar types for milling different foods, *Olivella* shell beads and disk beads, and various other artifacts.

3.5.2.2 Ethnography

Chumash is a name derived from the traditional Chumash language that is used by anthropologists to refer to several closely related groups of Native Americans that spoke seven similar languages. The

Chumash people lived between Malibu in Los Angeles County and the Monterey County line, on the northern Channel Islands, and east as far as the edge of Kern County. Chumash territory has been divided into sections representing the various linguistic subgroups. There is limited information about the geographical limit of the dialects and the purported boundaries are based more on topography. However, the territorial divisions may correspond more to catchment areas of the missions for which the groups were named rather than the groups' actual native territories (Kroeber et al. 1911).

The Interior and Inezeño Chumash are known to have villages that numbered approximately 100 to 200 individuals, a significantly smaller population, in contrast to the 500 to 1,000 individuals that inhabited settlements along the Santa Barbara Channel (Glassow 1990). In addition to consisting of lower population densities, the inland groups also appeared to have greater seasonal mobility; subsistence focused on acorns and stored food during the winter, and tubers, grass seeds, and bulbs during the spring. Fish provided a high-quality food source in the late summer and early fall, while hunting was best in spring, summer, and fall (Landberg 1965).

Despite being a largely non-agricultural group, the Chumash exhibited a complex society that tied separate villages together by regionally influencing economic, religious, and political systems. Personal rankings were dependent on wealth and social status, occupations were specialized, leadership was hereditary and the chiefdom could span several villages.

The Chumash had a rich material culture consisting of utilitarian items such as fishnets, fishhooks, baskets, stone bowls, canoes (*tomols*) among coastal groups, and projectile points. In addition, some utilitarian objects and religious objects such as charmstones were decorated with shell beads. The decimation of Native American populations and subsequent deterioration of cultural practices as a result of missionization is a profound event in the history of the coastal region. Much information was lost, and the mission records do not provide much insight into the lifeways of the Chumash or other groups of the coastal region before contact with Europeans.

3.5.2.3 History

Santa Barbara County

European contact with the Chumash occurred in 1542 A.D. during Juan Cabrillo's explorations. He aimed to reassert Spanish claims in the area. Spanish missionaries began their exploration of California and the development of the missions in the 1760s. The Spanish Colonial Period (1769–1822) is marked by the establishment of permanent Spanish settlements. The Santa Barbara Presidio (or military fort) that was founded in 1782 and five Franciscan missions in Chumash territory generated significant disruptions in the existing way of life. The establishment of the Santa Barbara, Santa Ines, and La Purisima Missions led to the incorporation of the Chumash into mission settlements and the gradual depopulation of Chumash villages and settlements. During the Mission Period (1760–1820), some lands held by the missions were granted to Spanish military veterans. These land grants foreshadowed the subsequent Rancho Period (1820–1845) in California.

Following Mexican independence from Spain in 1822, the Mexican government gained control over California. About 500 land grants were given to local rancheros during the Rancho Period. Ranchos are located within the Project area (County of Santa Barbara Surveyor 2008). Life on the ranchos in many ways resembled life in the Spanish missions. The typical rancho employed between 20 and several hundred Native American workers, many of whom had formerly lived at local missions. The

Mexican-American War occurred between 1846 and 1848 and ended with the Treaty of Guadalupe Hidalgo, which made California a U.S. territory. In 1848, the land once occupied by the Chumash was taken possession of by the U.S., which led to California's statehood in 1850. The state's Gold Rush brought many settlers to the county. During a heavy drought in the 1860s, cattle prices declined, which led to the sale of various rancho lands throughout California.

Oil was first discovered in California during the 1860s but did not become a major economic force until the 1890s. George S. Gilbert was among the first men to drill for oil in California when he built a small refinery on the Ojai Ranch in Ventura County in 1861. Experiments with the substance determined that the oil provided a cleaner, cheaper, and more effective fuel source than coal. Oil also provided an alternative to the kerosene shortage that resulted when the outbreak of the Civil War interfered with the shipping of supplies from the East.

Santa Maria Valley

Settlers initially came to the Santa Maria Valley in the late 19th century to take advantage of the area's prime soils and established the region as an agricultural-intensive area. The ranchos in the area included the Tinaquaic Rancho in Santa Maria. The City of Guadalupe was established in the 1840s as part of a Mexican land grant and incorporated in 1946. The city's name honors Our Lady of Guadalupe (a title given to the Virgin Mary). The City of Santa Maria was also established after several agriculturalists banded together to donate land at the intersection of their properties in 1875. Although it was first called Grangerville, the name of the city changed to Central City, and then finally to Santa Maria in 1885. By the 1900s, the Santa Maria Valley became one of the most productive agricultural regions in the state. Oil exploration in the Santa Maria Valley began in 1888, and in 1901 William Orcutt introduced Union Oil in the area. Oil development increased and intensified throughout the 1900s and became an additional economic and organizing force in the region.

Lompoc Valley

European settlement of the Santa Rita Hills and the Lompoc Valley began in 1787 after the establishment of the La Purisima Mission. The ranchos in the region included Lompoc and San Julian Rancho in Lompoc, the Punta de la Concepcion Rancho in Point Conception, and the Ex-Mission la Purisima Rancho in Los Berros. In 1874, the Lompoc Land Company established a temperance colony located along the Coast Line stagecoach route between San Luis Obispo and Santa Barbara, which dispersed with the incorporation of the City of Lompoc in 1888. The introduction of the coastal railroad between San Francisco and Los Angeles, and the subsequent Lompoc extension in 1901, facilitated growth in the valley and the clearing of lands for agricultural production. In the early twentieth century, the mining of diatomaceous earth began and the mining industry came to be a major employer. Agriculture and mining continue to be major industries in the Lompoc Valley; in particular, flower cultivation dominates the agricultural industry (Lompoc Valley Historical Society 2017).

Santa Ynez Valley

The ranchos in the region included the Santa Rosa Rancho in Buellton, the Cañada de los Pinos and Nojoqui Ranchos in Solvang, and La Laguna Rancho in Santa Ynez. The extension of transportation systems into the Santa Ynez Valley was a precursor to future settlement. The Coast Line stagecoach arrived in 1861 and the Santa Ynez Turnpike was completed in 1869. In 1881, the town of Ballard was founded (Rife 1977). The town of Santa Ynez was established one year after Ballard in 1882. In 1887,

Los Olivos became the third town to be established in this region. The town was named after the olive grove that grew on the mesa east of town (Rife 1977).

The railroad was eventually extended to San Luis Obispo from Santa Barbara. The town of Buellton originated from a post office at the Buell ranch in 1883. A schoolhouse developed in 1889 marked the turning point for a community centered on agriculture and ranching and, by 1918, its charter was official. Danish settlers purchased what is now known as Solvang, or Sunny Field, as translated in Dutch.

The Franciscan missionaries developed an outpost for livestock operations in Los Alamos. The rancho in Los Alamos was called the Los Alamos Rancho. With the development of the stagecoach route in 1873, Los Alamos became a layover stop. Between 1875 and 1878, portions of the Los Alamos and La Laguna Ranchos were purchased to establish the town of Los Alamos. Subsequently, Los Alamos became a commercial center for the Los Alamos Valley. The arrival of the Pacific Coast Railroad in 1882 allowed for the transport of agricultural goods from the valley and boosted the valley's economic value. The introduction of the automobile and the discovery of oil in the Los Alamos Valley between 1915 and 1945 impacted the region and led to the development of a main thoroughfare (later U.S. Highway 101) and road infrastructure (County of Santa Barbara Planning and Development Department [P&D] 2010).

Cuyama Valley

Two ranchos – Rancho Cuyama M.A. de la G.Y. Lata and Rancho Cuyama Cesario Lataillade – were granted along the Cuyama River in the Cuyama Valley and agriculture was and continues to be a defining characteristic of this region (County of Santa Barbara Surveyor 2008). The Cuyama Valley developed slowly due to its remoteness and lack of transportation infrastructure. The alignment for State Route (SR) 166 was adopted into the state highway system in 1919 but the roadway was not constructed until the early 1930s. Following, the town of Cuyama developed in the 1930s. The Atlantic Richfield Company developed the town of New Cuyama in the early 1950s as a base for its work force in the Cuyama Valley.

South Coast

Ranchos in the South Coast region included Nuestra Señora del Refugio in present-day Refugio State Beach, Cañada del Corral in Gaviota, La Goleta and Dos Pueblos in Goleta and Las Positas y La Calera in Hope Ranch. Gaviota was known for farming and cattle ranching. Goleta Valley was largely agricultural and was known for lemon growing. Many of the ranchos were sold in the 1860s due to the drought. The City of Santa Barbara was established in 1850 following the Mexican-American War. Wood buildings replaced the Spanish and Mexican adobe, and the city adopted a gridded street pattern. Natural gas and crude oil were first extracted from the Santa Barbara Channel along the coast at Summerland in 1866. In 1902, oil drilling at Summerland's beaches hit its peak. Oil and gas extraction in Goleta primarily occurred along Ellwood Mesa. Tourism and settlement steadily rose after the Southern Pacific Railroad completed its track link from Santa Barbara to Los Angeles and San Francisco in 1901. In the 1860s, Italians settled in Montecito and began farming (City of Santa Barbara 2022).

3.5.2.4 Known Cultural Resources in Santa Barbara County

Historic Resources

The National Register of Historic Places (NRHP) is the official list of historic districts, sites, buildings, structures, and objects deemed worthy of preservation by the Secretary of the Interior. National Historic Landmarks (NHL) are designated nationally significant historic places because they possess exceptional value or quality in illustrating or interpreting the heritage of the U.S. There are 47 historic properties and districts in Santa Barbara County listed on the NRHP, including eight NHLs (U.S. National Park Service 2022). A total of 31 of these sites listed on the NRHP are located within the unincorporated county (Table 3.5-1).



In the unincorporated county, historical landmarks are concentrated within the Santa Maria Valley and Santa Ynez Valley, such as the Benjamin Foxen Adobe Site on the Holt Ranch, located in the Santa Ynez Valley Planning Area. Source: County of Santa Barbara 2021a.

The CRHR program encourages public recognition and protection of resources and consideration under the California Environmental Quality Act (CEQA). California Historical Landmarks (CHL) are buildings, structures, sites, or places that have been determined to have statewide historical significance. CHLs are automatically listed in the CRHR. There are 16 designated CHLs in Santa Barbara County (Office of Historic Preservation [State OHP] 2022). A total of 4 CHLs are located within the unincorporated county (Table 3.5-1). No CHLs are located within or adjacent to properties included in the sites inventory prepared for the Housing Element Update.

County Historic Landmarks and Places of Historic Merit are designated by the County's Historic Landmarks Advisory Commission (HLAC). Places of Historic Merit are recognized as having historic, aesthetic, or cultural value; however, they are not protected by restrictions as to demolition, removal, alteration, or use like Historic Landmarks are, which are recognized at a higher level of historic, aesthetic, or cultural significance. Places, sites, buildings, and structures can be designated as historic if they meet one of more of the County HLAC's specific criteria. There are 31 designated County Historic Landmarks and 22 designated County Places of Historic Merit located in the unincorporated county (Table 3.5-1 and Table 3.5-2; County of Santa Barbara 2021a, 2021b). Of these, three county historic landmarks and two places of historic merit, including the Pine Grove Cemetery in Orcutt, the Hitching Post in Casmalia, the Sisquoc store in Sisquoc, Lane Family Main Farm House and Cottage in Eastern Goleta Valley, and William and Lydia Davis House in Los Olivos, are located near or adjacent to potential housing sites in the sites inventory prepared for the Housing Element Update.

Table 3.5-1. Known Historic Sites within Unincorporated Area of Santa Barbara County

Community	Region	Resource Name	National Register	National Landmark	State Landmark	County Landmark
Ballard	Santa Ynez Valley	Ballard Little Red Schoolhouse				X
Ballard	Santa Ynez Valley	Ballard Presbyterian Church				X
Sisquoc	Santa Maria Valley	Benjamin Foxen Adobe Site				X
Los Olivos	Santa Ynez Valley	Berean Baptist Church				X
Montecito	South Coast	Canby House				X
Sisquoc	Santa Maria Valley	Chapel of San Ramon			X	
Lompoc	Lompoc Valley	Cota Adobe on Rancho Santa Rosa				X
Manzana Creek	Santa Ynez Valley	Dabney Cabin				X
Ballard	Santa Ynez Valley	Davison House				X
Montecito	South Coast	Deane School Buildings				X
New Cuyama	Cuyama Valley	Eastern Sierra Madre Ridge Archaeological District	X			
Solvang	Santa Ynez Valley	Foley Estates Vineyard and Winery				X
Gaviota	South Coast	Gaviota Pass			X	
Los Olivos	Santa Ynez Valley	Hartley House				X
Casmalia	Santa Maria Valley	Hitching Post				X
Montecito	South Coast	Juarez-Hosmer Adobe				X
Lompoc	Lompoc Valley	La Purisima Mission	X	X	X	
Gaviota	South Coast	Las Cruces Adobe				X
Montecito	South Coast	Leaping Greyhound Bridge				X
Los Alamos	Santa Ynez Valley	Los Alamos Ranch House	X	X		
Manzana Creek	Santa Ynez Valley	Manzana School House				X
Los Olivos	Santa Ynez Valley	Mattei's Tavern				X
Montecito	South Coast	Moody Sisters Cottage				X
Santa Barbara	South Coast	Painted Cave	X			

Table 3.5-1. Known Historic Sites within Unincorporated Area of Santa Barbara County (Continued)

Community	Region	Resource Name	National Register	National Landmark	State Landmark	County Landmark
Orcutt	Santa Maria Valley	Pine Grove Cemetery				X
Santa Barbara	South Coast	Point Conception Light Station	X			
Point Sal Highlands	Santa Maria Valley	Point Sal Ataje	X			
Solvang	Santa Ynez Valley	Rancho El Alamo, Pintado Adobe				X
Montecito	South Coast	Rancho Las Fuentes Lemon Packing House				X
Montecito	South Coast	San Ysidro Ranch				X
Santa Barbara	South Coast	Santa Barbara Botanic Garden, Mission Dam and Aqueduct				X
Lompoc	Lompoc Valley	Santa Rosa School				X
Santa Ynez	Santa Ynez Valley	Santa Ynez Public Library				X
Montecito	South Coast	Sheldon House				X
Sisquoc	Santa Maria Valley	Sisquoc Church and San Ramon Chapel Cemetery				X
Sisquoc	Santa Maria Valley	Sisquoc store				X
Lompoc	Lompoc Valley	SS YANKEE BLADE	X			
Montecito	South Coast	Steedman Estate	X	X		
Los Alamos	Santa Ynez Valley	Union Hotel and California Garage				X
Conception	Lompoc Valley	USCG McCullough Shipwreck	X			
Lompoc	Lompoc Valley	Well, Hill 4			X	
Summerland	South Coast	World War I Monument				X
Solvang	Santa Ynez Valley	Wulff's Windmill				X

Source: County of Santa Barbara 2021a; State OHP 2022; U.S. National Park Service 2022a.

Table 3.5-2. County Places of Historic Merit

Community	Region	Resource Name
Montecito	South Coast	Casa Del Greco
Montecito	South Coast	Clavelitos
Montecito	South Coast	Cowles Road
Montecito	South Coast	Hermosillo Road
EGV	South Coast	Lane Family Main Farm House and Cottage
Montecito	South Coast	Riven Rock Stone Water Tower and Reservoir
Montecito	South Coast	Stone Bridges of Riven Rock
Los Olivos	Santa Ynez Valley	Lansing's Bridge
Buellton	Santa Ynez Valley	Rancho La Purisma / Pleasant Valley School House
Los Olivos	Santa Ynez Valley	D.D. Davis Store
Buellton	Santa Ynez Valley	Walter and Evelyn's Central Avenue House
Gaviota	South Coast	Vista del Mar School
Gaviota	South Coast	El Rancho Tajiguas (Main House)
Los Olivos	Santa Ynez Valley	Tunnell-Brown House
Montecito	South Coast	Glen Oaks Stable/Carriage House
Los Olivos	Santa Ynez Valley	Berean Baptist Church Sunday School Building
Los Olivos	Santa Ynez Valley	William and Lydia Davis House

Source: County of Santa Barbara 2021b.

Santa Maria Valley

Within the Santa Maria Valley, there are seven County- and state-designated historic properties and/or landmarks and one nationally-designated resource. Examples of these include the Pine Grove Cemetery in the community of Orcutt and several pioneer-era buildings in and around the unincorporated community of Sisquoc (County of Santa Barbara 2021a; State OHP 2022). The Pine Grove Cemetery in Orcutt is within 200 feet of a potential housing site identified in the sites inventory, potential County-owned sites, and/or potential rezone sites prepared for the Housing Element Update, located off Trilogy Circle. Another County landmark, the Sisquoc store, is located within 200 feet of a potential housing site identified in the sites inventory prepared for the Housing Element Update in the community of Sisquoc. Two properties identified as potential housing sites in the sites inventory prepared for the Housing Element Update are located less than 200 feet from the Hitching Post. Additional historic resources are known to exist within and around the community of Orcutt, particularly within the Old Town area, and consist largely of historic structures from the early 1900s, such as the James L. Forbes house and Orcutt Hotel (County of Santa Barbara 1997). There are no designated County Places of Historic Merit within the unincorporated areas of the Santa Maria Valley (County of Santa Barbara 2021b).

Lompoc Valley

Within the Lompoc Valley, there are six County- and state-designated historic properties and/or landmarks and three nationally-designated resources. These resources include the La Purisima Mission, the wreck of the SS Yankee Blade, and the USCG McCullough Shipwreck (County of Santa Barbara 2021a; State OHP 2022). There are no designated County Places of Historic Merit within the Lompoc Valley Region (County of Santa Barbara 2021b).

Santa Ynez Valley

Within the Santa Ynez Valley, there are 13 County- and state-designated historic properties and/or landmarks and one nationally designated resource in the unincorporated area. Examples of these resources include the Little Red Schoolhouse and Presbyterian Church in the community of Ballard, the Los Alamos Ranch House (an NHL) and Union Hotel in Los Alamos, and the Hartley House and Mattei's Tavern in Los Olivos (County of Santa Barbara 2021a; State OHP 2022). There are seven designated County Places of Historic Merit within the unincorporated areas of the Santa Ynez Valley, five of which are located around the community of Los Olivos (County of Santa Barbara 2021b). None of these historic resources are located on, adjacent to, or within 200 feet of potential housing sites in the sites inventory prepared for the Housing Element Update.

Cuyama Valley

Within the Cuyama Valley, there are no County- or state-designated historic properties and/or landmarks and one designated historic resource.. The Eastern Sierra Madre Ridge Archaeological District is listed on the NRHP (State OHP 2022). This resource is not located on, adjacent to, or within 200 feet of potential housing sites in the sites inventory prepared for the Housing Element Update. There are no designated County Places of Historic Merit within the Cuyama Valley (County of Santa Barbara 2021b).

South Coast

Within the unincorporated South Coast, there are 12 County- and state-designated Historic Landmarks and 2 nationally listed resources. Several of these resources exist near potential housing sites in the sites inventory prepared for the Housing Element Update. An example of this includes the Joseph Sexton House located in the City of Goleta north of the South Patterson Agricultural Area across Hollister Avenue in the Eastern Goleta Valley (County of Santa Barbara 2021a). There are 10 designated County Places of Historic Merit within the South Coast (County of Santa Barbara 2021b).

Archaeological and Tribal Cultural Resources

Prehistoric and historic archaeological resources represent and document activities, accomplishments, and traditions of previous occupation, and link current and former inhabitants of an area. Some archaeological sites and the artifacts and remains in them are a sacred part of the heritage, religion, and culture of the Native American community, which indicates a tribal cultural resource, as defined by the state legislature in 2015 with the passing of Assembly Bill (AB) 52. Tribal cultural resources are defined as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR or local register of historical resources, or determined by a lead agency to be significant according to criteria outlined in CEQA. Tribal cultural resources may include Native American archaeological sites. As archaeological and tribal cultural resource sites are among the most fragile, nonrenewable resources in California, various laws and regulations require the development of property to be accompanied by a rational and respectful concern for the protection of cultural resources. County policy requires the preservation and protection of these sites and resources. (See Section 3.5.3, *Regulatory Setting*, for a description of pertinent laws and regulations.)

Archaeological Potential of the County

The summary below is based on information obtained from the Central Coast Information Center (CCIC) at the Department of Anthropology at the University of California, Santa Barbara (UCSB) and included in the County Comprehensive Plan Conservation Element (County of Santa Barbara 2010). As part of the Conservation Element, the County created maps using CCIC data to estimate the density of known sites in planning areas and to evaluate applications for specific development projects on a project-by-project basis. There are two classes of archaeological site density: 1) High-Density, which is greater than one site per square mile; and 2) Low-Density, which is less than one site per square mile. Table 3.5-3 shows archaeological site density and a brief narrative for each region and includes the region's topographic classification. A topographic classification was included because the type of adaptation represented in archaeological sites, and the density of such sites, tends to vary according to the environment. The topographic classes include coastal strand, mountain ridge, and valley bottom. The entire coastline of the county could be linked into one large High-Density zone. While Table 3.5-2 indicates areas of the county that may be archeologically sensitive, this information does not provide complete or adequate information for specific planning areas or sites since most of the county has not been surveyed for archaeological resources. When surveys have occurred, they have been primarily associated with specific development applications. As such, Table 3.5-3 indicates the generally known locations of archeological potential but does not rule out the potential for archeological sensitivity in other regions of the county.

Table 3.5-3. Archaeological Site Density Areas in Santa Barbara County

Region	Topographic Class	Density Class	Description
South Coast	Coastal	High Density	Chumash at the time of Spanish contact; Santa Barbara-Goleta foothills is especially high-density
San Marcos Pass	Mountain	High Density	San Marcos Pass Native American trade route between the coast and Santa Ynez Valley; sites in the area are predominately rock shelters and pictographs are reported
Upper Santa Ynez River	Valley	High Density	A large number of sites in Lake Cachuma and surrounding valleys and canyons
Solvang	Valley	High Density	Historic sites associated with the Mission, a probable protohistoric village site, and possibly some related smaller sites
Happy Canyon	Mountain	High Density	The entire canyon is high-density; Cachuma Camp is known to be high-density
Pendola and Juncal Ridge	Mountain	High Density	The entire length of the Santa Ynez can be considered high-density; connects to the Upper Santa Ynez high-density region
Zaca Lake	Mountain	High Density	Sites represent a special adaptation to unusual environmental conditions; historic occupation is known
Hurricane Deck	Mountain	High Density	Subject to looters
Sierra Madre Ridge	Mountain	High Density	Includes many pictograph sites; wilderness area contains high-density sites as well

Table 3.5-3. Archaeological Site Density Areas in Santa Barbara County (Continued)

Region	Topographic Class	Density Class	Description
Santa Barbara Potrero and Santa Barbara Canyon	Mountain	High Density	Delimited by the grassy vegetation of the potrero
Davey Brown Canyon	Mountain	High Density	Historical interior village and related smaller sites
Potrero Seco	Mountain	High Density	The mountainous region adjacent to the Ventura County line
Vandenberg	Coastal	High Density	High-density on Vandenberg Space Force Base (VSFB) and adjacent areas
Birabent Canyon	Mountain	Low Density	Little is known
Santa Cruz Creek	Mountain	Low Density	Little is known
Nojoqui Summit	Valley	Low Density	Known Chumash trade route and region includes pictograph sites
Rancho San Julian	Mountain	Low Density	Little is known
Lompoc	Valley	Low Density	Little is known, but probable that more sites exist here given the Upper Santa Ynez River and Pendola high-density sites
Point Conception	Coastal	Low Density	A few sites are known, but probable that more sites exist; after adequate surveying of the region, the entire coastline of the county can probably be linked into one large High-Density zone

[1] These density classes are estimates based on known site locations only, as most of the county has not been surveyed for archaeological resources.
Source: County of Santa Barbara 2010.

Archeological Potential of Orcutt and Eastern Goleta Valley

The information regarding archeological site locations is sensitive and confidential, and therefore cannot be published publicly. However, based on the described archaeological site density provided in Table 3.5-3, known archaeological sites and the sites inventory prepared for the Housing Element Update, the areas of the county that are considered to have the greatest archaeological potential relative to the proposed Project are communities of Orcutt and Eastern Goleta Valley, as further described below.

In Orcutt, there are four known pre-historic archaeological sites, three mixed archaeological sites (containing both historic and pre-historic resources), and ten known isolated artifacts. The Casmalia and Solomon Hills, as well as all creek corridors within Orcutt, are considered highly sensitive archaeological regions with the potential for the future discovery of significant cultural resources. This area was part of the territory of the Purismeno branch of Chumash-speaking people and was likely inhabited by their ancestors or other peoples. At the time of early Spanish exploration in this area, the Chumash occupied two villages in the vicinity of present-day Orcutt known as ‘Ahwapsh’ (“in the nettles") and 'Anaquwuk’ (no translation). Both villages are presumed to have been located along Orcutt Creek or Solomon Creek (County of Santa Barbara 1997). Remaining archaeological sites are most often found in areas with level slopes and proximity to water, such as rivers, creeks, lakes, marshes, floodplains, and drainage confluences. The Orcutt area contains areas with all these features

present, meaning undeveloped parcels in the Orcutt area represent possible sensitivity to archaeological resources. (County of Santa Barbara 1997).

In Eastern Goleta Valley Community Plan area, there are more than 121 sites and 378 cultural resource surveys recorded (County of Santa Barbara 2015). The distribution of mapped prehistoric sites is concentrated in areas along and above drainages, including creek intersections, bluffs, knolls, and ridges, as well as coastal settings near the Goleta Slough. The recorded cultural resources in the Eastern Goleta Valley vary widely in their nature and time of use or occupation, including prehistoric Native American archaeological sites dating from 9,000 years ago to the time of European contact. Prehistoric archaeological sites in the area are expected to be primarily located near drainages, creek confluences, bluffs, and estuaries (County of Santa Barbara 2015).

Tribal Cultural Resources Consultation

Before the Program EIR scoping comment period, the County sent written invitations to tribes identified by the California Native American Heritage Commission (NAHC) to participate in tribal consultation regarding the proposed Project under Senate Bill (SB) 18 and AB 52. The County sent 15 letters offering tribal representatives the opportunity to consult with the County related to the proposed Project as a proposed Comprehensive Plan amendment in compliance with SB 18. Two additional letters were sent to offer tribal consultation related to the Program EIR in compliance with AB 52. As described in Chapter 1, *Introduction*, the County released a second NOP to the public on August 11, 2022, and the comment period ran from August 11, 2022, to September 9, 2022. To date, the County has not received requests to participate in government-to-government consultation associated with the proposed Project, pursuant to PRC Section 21080.3.1 and in accordance with the provisions of AB 52. At this time, no tribes have requested initiation of AB 52 consultation or further contact with the tribe's representative(s).

3.5.3 Regulatory Setting

Federal, state, and local regulations have been enacted to protect cultural and tribal cultural resources in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.5.3.1 Federal

National Register of Historic Places

The NRHP was established by the National Historic Preservation Act of 1966 to help identify and protect properties that are significant cultural resources at the national, state, and/or local levels. Listing of private property on the NRHP does not prohibit the property owner from taking actions that may result in the alteration or demolition of the historic resource. Certain provisions of the Tax Reform Act of 1976 that encourage the preservation of depreciable historic structures by allowing favorable tax treatments for rehabilitation, and discourage destruction of historic buildings, may apply. Four criteria have been established to determine if a resource is significant to American history,

architecture, archaeology, engineering, or culture and should be listed in the NRHP.[1] These criteria include:

A. It is associated with events that have made a significant contribution to the broad patterns of our history;

B. It is associated with the lives of persons significant in our past;

C. It embodies the distinctive characteristics of a type, period, or method of construction that represents the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;

D. It yields, or may be likely to yield, information important in prehistory or history. Districts, sites, buildings, structures, and objects of potential significance that are at least 50 years of age must meet one or more of the above criteria to be eligible for listing in the NRHP. However, the NRHP does not prohibit the consideration of properties less than 50 years of age whose exceptional contribution to the development of American history, architecture archeology, engineering, and culture can be demonstrated under NRHP Criteria Consideration G.

3.5.3.2 State

California Register of Historical Resources

The State of California Historical Resources Commission has designed the CRHP for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The CRHP is the authoritative guide to the state's significant historical and archaeological resources. The State OHP administers federally- and state-mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's irreplaceable historic resources.

Cultural resources are protected by California PRC Section 5024.1, which established the CRHR. Section 5024 requires state agencies to provide notice to, and to confer with the State Historic Preservation Office (SHPO) before altering, transferring, relocating, or demolishing state-owned resources.

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. The following criteria are utilized when determining if a resource has architectural, historical, archaeological, or cultural significance.

- **Criterion 1:** Is the resource associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the U.S.?
- **Criterion 2:** Is the resource associated with the lives of persons important to local, California, or national history?

[1] "Guidelines for Completing National Register of Historic Places Forms: Part A – How to Complete the National Register Registration Forms," National Register Bulletin 16A, U.S. Department of Interior, National Park Service, 1997. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the National Register of Historic Places.

- **Criterion 3:** Does the resource embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or possesses high artistic values?
- **Criterion 4:** Has the resource yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation?

These factors are broadly mirrored in criteria for historic significance within CEQA, CRHR, and the County Code.

California Environmental Quality Act (CEQA) Section 15064.5

CEQA Guidelines Section 15064.5 states that a resource shall be considered "historically significant" if it meets any of the criteria for listing in the CRHR (PRC Section 5024.1, Title 14 California Code of Regulations, Section 4852). A resource may qualify for CRHR listing if it:

A. is associated with events that have made a significant contribution to the broad patterns of California's history or cultural heritage;

B. is associated with the lives of persons important in our past;

C. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

D. has yielded, or may be likely to yield, information important in prehistory or history.

Cultural resources meeting one or more of these criteria are defined as "historical resources" under CEQA. Included in the definition of historical resources are prehistoric archaeological sites, historic archaeological sites, historic buildings and structures, traditional cultural properties important to a tribe or other ethnic group, cultural districts and landscapes, and a variety of other property types.

Resources included in a local register of historical resources (pursuant to PRC Section 5020.1[k]) or identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]) also are considered "historical resources" for the purposes of CEQA.

The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources, or not identified in a historical resources survey, does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1I.

California Coastal Act

The California Coastal Commission is tasked with the protection of coastal resources, including those having prehistoric, paleontological, historic, and cultural importance within the Coastal Zone. Section 30244 of the Act seeks to minimize the adverse impacts to archaeological resources within the Coastal Zone by requiring mitigation of adverse impacts to these resources by any development. It states that where development would adversely impact archaeological or paleontological resources as identified by the SHPO, reasonable mitigation measures shall be required.

Assembly Bill 52

AB 52 amended PRC Section 5097.94 (CEQA) and added eight new sections to the PRC relating to Native Americans. It was passed and signed into law in 2014 and took effect on July 1, 2015. This law establishes a new category of resources called tribal cultural resources (PRC Section 21074) and establishes a process for consulting with Native American tribes and groups regarding those resources. The consultation process must be completed before a CEQA document can be certified. Native American tribes to be included in the process are identified through consultation with the NAHC (PRC Section 21080.3.1).

Tribal cultural resources are "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe…" (PRC Section 21074.1). A tribal cultural resource must be on, or eligible for, the CRHR as described above for historical resources, or must be included in a local register of historical resources. Additionally, as discussed above for historical resources, the lead agency can determine that a tribal cultural resource is significant even if it has not been evaluated as eligible for the CRHR or is not on a local register.

AB 52 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

Senate Bill 18

Passed in 2004, SB 18 requires cities and counties to consult with Native American tribes to help protect traditional tribal cultural places through the land use planning process. SB 18 applies to general plan adoption or amendments and specific plan adoption or amendments. Unlike AB 52, SB 18 is not an amendment to, or otherwise associated with, CEQA. Instead, SB 18 requires cities and counties to consult with Native American tribes early during broad land use planning efforts on both public and private lands, before site- and project-specific land use decisions (Governor's Office of Planning and Research 2005). The County P&D has developed protocols for Native American consultation under SB 18 and has incorporated the requirement into its Permit Process Procedures Manual.

A Native American tribe is defined as a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC (Governor's Office of Planning and Research 2005). Traditional tribal cultural places are defined in PRC Section 5097.9 and Section 5097.993 to include sanctified cemeteries, places of worship, religious or ceremonial sites, sacred shrines, or any historic, cultural, or sacred site that is listed on or eligible for the CRHR including any historic or prehistoric ruins, burial grounds, or archaeological site (Governor's Office of Planning and Research 2005).

Under SB 18, cities and counties must notify the appropriate Native American tribe(s) of intended adoption or amendments to general plans or specific plans and offer the opportunity for the tribe(s) to consult regarding traditional tribal cultural places within the proposed plan area. Consultation is intended to encourage the preservation and protection of traditional tribal cultural places by developing treatment and management plans that might include incorporating the cultural places into designated open spaces (Governor's Office of Planning and Research 2005).

Native American Historic Resource Protection Act; Archaeological, Paleontological, and Historical Sites; Native American Historical, Cultural, and Sacred Sites (Public Resources Code Section 5097-5097.994)

PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of Native American human remains on non-federal public lands. PRC Section 5097.9 states that no public agency or private party on public property shall *"interfere with the free expression or exercise of Native American Religion."* The PRC further states:

> *"No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine…except on a clear and convincing showing that the public interest and necessity so require."*

Codes Governing Human Remains

CEQA Guidelines Section 15064.5 also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. The disposition of human remains is governed by the California Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98 and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

3.5.3.3 Local

Santa Barbara County Comprehensive Plan

Land Use Element

The Comprehensive Plan Land Use Element (adopted 1980, amended and republished 2016) lays out the general patterns of development throughout the unincorporated areas of the county. The County requires the protection of significant archaeological and historic resources to the greatest extent possible. The Land Use Element contains the following Historical and Archaeological Sites Policies:

1. All available measures (e.g., purchase, tax relief, purchase of development rights) shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.
2. When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.
3. When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accordance with the guidelines of the State OHP and the State NAHC.
4. Off-road vehicle use, unauthorized collection of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.

5. Native Americans shall be consulted when development proposals are submitted that impact significant archaeological or cultural sites.

Conservation Element

The Comprehensive Plan Conservation Element (adopted 1979, amended and republished 2010) describes the historic and archaeological setting of the county and lists resources that are known to be present or potentially present in the county. While the Conservation Element does not contain any specific policies addressing historic and archaeological resources, it does include the following recommendations in reference both to general urban expansion and to development projects:

- Once the most likely direction of urban growth has been determined from the Comprehensive Plan, those archaeological site areas most likely to be subjected to development should be systematically surveyed. Such surveys would provide information on the nature and location of sites that would be useful to planners and developers before modification begins.

For specific development projects, the Conservation Element recommends the following:

- A systematic ground survey of the project area and alternative areas should be carried out by the archaeologist selected. Preliminary testing of sites within the designated construction area may be included.
- A report should be submitted by the archaeologist to the planners and developers concerned with the project and to responsible government agencies. This report should include details on surface and sub-surface finds, an evaluation of the area and the sites it may contain, and suggestions for further actions concerning archaeological resources.

The Conservation Element also contains the following recommendations in which archaeological studies may be incorporated into projects.

- Archaeological sites may be incorporated into parks or landscaped areas in such a way that no damage will be done to the archaeological materials
- Areas with archaeological sites may also be designated as limited use areas where they can be protected from vandalism. For either of these first two alternatives, a preliminary survey and surface collection by a competent archaeologist must be carried out prior to any action. Buffer zones adjacent to these sites may be necessary, but the extent of such a zone must be determined for each site
- Outdoor museums are a feasible alternative to destruction when the nature of the archaeological remains is such that their careful excavation and preservation by professionals would prove attractive to the public. This alternative would be of value to the public relations of many private firms and would serve to increase the awareness of the county's prehistory among both residents and tourists. A museum of this sort might consist of a simple tin roof and fence protecting ongoing or completed excavations and appropriate displays of artifacts. Painted Cave is an example of how this approach has been implemented in the county.
- One method of preserving sites for future archaeological investigation is through the use of extensive land fill. If sites scheduled for possibly damaging use could be covered with sufficient clean fill to avoid damage, such sites would be preserved.
- Salvage excavation is a last resort in the preservation of archaeological information. Such short-notice excavations destroy relevant information which might be more effectively excavated with

future improved archaeological methods and techniques. In salvage archaeology, it frequently is impossible to generate an adequate research design before excavation is commenced. Considering these factors, the loss of valuable information is inevitable. In addition, salvage operations are expensive undertakings. Consequently, every effort should be made to preserve, rather than excavate endangered archaeological sites.

Community Plans

Community-specific goals and policies for historic and archaeological resources are provided in several adopted community plans as part of the Comprehensive Plan. A policy is a specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed. Any future housing and associated development within the community plan areas would be subject to the cultural, tribal cultural, and historic resource protection and preservation goals and policies of that plan. Examples of key goals, policies, and development standards from community plans that may be applicable to development enabled by the Housing Element Update are presented below.

Eastern Goleta Valley Community Plan

- **Objective HA-EGV-1:** Protect and preserve significant archaeological, historic built environment, and tribal cultural resources in the Eastern Goleta Valley.
    - **Policy HA-EGV-1.1:** Known and discovered significant historic, archeological, and tribal cultural resources shall be protected from immitigable disturbance or destruction.
    - **Policy HA-EGV-1.2:** Development resulting in increased building size or demolition of buildings/structures included in the list of historic, or buildings/structures over 50 years of age and evaluated as important at the local, state or national level, shall be reviewed for consistency with historic resource preservation policies by P&D.
    - **Policy HA-EGV-1.3:** Development resulting in increased building size or demolition of buildings/structures included in the list of historic, or buildings/structures over 50 years of age and evaluated as important at the local, state or national level, shall be reviewed for consistency with historic resource preservation policies by P&D.
- **Objective HA-EGV-2:** Protect and preserve significant tribal cultural resources in the Plan area.
    - **Policy HA-EGV-2.1:** Significant tribal cultural resources of concern to the Chumash Indians should be protected and preserved to the maximum extent feasible.

Los Alamos Community Plan

- **Goal HA-LA-1:** Preserve and protect those cultural and historic resources deemed of special significance to the maximum extent feasible.
    - **Policy HA-LA-1.1:** Promote historic tourism by identifying and preserving local historic resources.
    - **Policy HA-LA-1.2:** Significant cultural, archeological, and historic resources in the Los Alamos Planning Area shall be protected and preserved. Efforts to preserve and enhance historic structures shall be encouraged.

- **DevStd HA-LA-1.2.1:** New development shall preserve and or restore the character defining features of significant historic resources, in particular, the façade of significant historic structures visible from Bell Street, unless shown to be technically infeasible and precludes reasonable development.

  For structures that have been determined to be a significant historic resource, the project applicant shall retain a County-qualified architectural historian to collaborate in designing the proposed adaptive reuse of structures that are to be renovated to maximize the integration of new architectural elements with those historical character-defining features.

Orcutt Community Plan

- **Policy HA-O-1:** Archaeological and historic resources in the Orcutt Planning Area shall be protected and preserved to the maximum extent possible.
  - **DevStd HA-O-1.1:** Development on Key Sites that have not been surveyed by a County qualified archaeologist should be surveyed and mitigated in accordance with State and County archaeological and historic guidelines.
- **Policy HA-O-2:** Structures of historic significance in Old Town Orcutt, as shown on Figure 34, shall be preserved unless this would prevent reasonable development of a property. If any of these structures are not designated as a historic structure by the County Landmarks Commission, it should be considered for such a designation as part of the Old Town Implementation Study.

Santa Ynez Community Plan

- **GOAL HA-SYV:** Preserve and protect significant cultural, archaeological and historical resources in the Santa Ynez Valley Planning Area to the maximum extent feasible.
  - **Policy HA-SYV-1:** Archaeological resources shall be protected and preserved to the maximum extent feasible.
    - **DevStd HA-SYV-1.1:** A Phase 1 archaeological survey shall be performed when identified as necessary by a County archaeologist or contract archaeologist using the best available resources. The content, format, and length of the Phase 1 survey report shall be consistent with the size of the project and findings of the study.
    - **DevStd HA-SYV-1.2:** If archaeological remains are identified and cannot be avoided through project redesign, the proponent shall fund a Phase 2 study to determine the significance of the resource prior to issuance of any permit for development. All proposed mitigation recommendations resulting from the Phase 1 or Phase 2 study, including completion of additional archaeological analysis (Phase 3) and/or project redesign shall be incorporated into any permit issued for development.
  - **Policy HA-SYV-2:** Historic resources shall be protected and preserved to the maximum extent feasible.
    - **DevStd HA-SYV-2.3:** No permits shall be issued for any development or activity that would adversely affect the integrity of officially designated Historic Landmarks and Structures of Merit, historical resources eligible for the CRHR, or identified historical districts unless a professional evaluation of the proposal has been performed pursuant to the County's most current Regulations Governing Archaeological and Historical Projects.

All such professional studies shall be reviewed and approved by County P&D and all feasible mitigation measures shall be incorporated into any permit issued for development.

- **Policy HA-SYV-4:** Traditional cultural, historical, and spiritual properties of concern to the Santa Ynez Tribal Elders Council should be protected and preserved to the maximum extent feasible.

County Landmarks and Places of Historic Merit Lists

The County maintains two local registers that identify local historic resources: the Santa Barbara County Landmarks list, and the Places of Historic Merit list. Both are maintained by HLAC. Pursuant to CEQA statute 21074(a)(1)(B) and CEQA Guidelines Section 15064.5(a)(2), any resource listed in a local register of historical resources is presumed to be a significant historical resource. As provided in County Code Chapter Section 18A-3, a place, site, building, structure, or object may be eligible for designation as a place of historic merit or landmark if:

a. It exemplifies or reflects special elements of the county's cultural, social, economic, political, archaeological, aesthetic, engineering, architectural, or natural history; and/or

b. It is identified with persons or events significant in local, state, or national history; and/or

c. It embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship; and/or

d. It is representative of the work of a notable builder, designer, or architect; and/or

e. It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of historic, prehistoric, archaeological, or scenic properties, or thematically related grouping of properties, which contribute to each other and are unified aesthetically by plan or physical development; and/or

f. It has a location with unique physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the County of Santa Barbara; and/or

g. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation; and/or

h. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particularly transportation modes or distinctive examples of park or community planning; and/or

i. It is one of the few remaining examples in the county, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

The designation of a landmark or a historic place alone does not place the property under special requirements or conditions of use, nor does it require repair or renovation of the premises. However, the HLAC may require maintenance of the premises as a condition for continued recognition of the

historic merit of the premises. Under Section 18A-5, the following provides a summary of special conditions that may be imposed on designated Landmarks:[2]

a. Demolition, removal, or destruction, partially or entirely, may be prohibited unless consent in writing is first obtained from the County HLAC.

b. Alterations, repairs, additions, or changes, other than normal maintenance and repair work shall not be made unless and until all plans have been reviewed and approved or modified by the County HLAC and reasonable conditions imposed as deemed necessary. All such work shall be done under the direction and control of the County HLAC. Decisions of the County HLAC may be appealed to the County Board of Supervisors.

c. That only certain specified uses may be made, or that certain specified uses shall be prohibited.

d. No buildings or structures exposed to public view within a specified distance may be placed, erected, moved in, altered, enlarged, or removed (other than normal maintenance and repair work) without approval, with reasonable conditions imposed, where deemed necessary, by the HLAC.

e. Other reasonable requirements, restrictions, or conditions to meet special or unique circumstances.

Santa Barbara County Land Use and Development Code

Section 35.60.040 of the County's Land Use and Development Code (LUDC) contains the following standards addressing archaeological resources:

A. Development proposed on a lot where archaeological or other cultural sites are located shall be designed to avoid impacts on the cultural sites if possible.

B. When sufficient planning flexibility does not permit avoiding construction on an archaeological or other cultural site, adequate mitigation shall be required. Mitigation shall be designed in compliance with the guidelines of the State OHP and the State NAHC.

C. Native Americans shall be consulted when development proposals are submitted that impact significant archaeological or cultural sites.

D. All available measures (e.g., purchase of the site, tax relief, purchase of development rights) shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.

Planning permit requirements for demolition and replacement in-kind of an existing and conforming structure are exempt under Section 35.20.040 of the LUDC if the structure is less than 50 years old or if the Director or the HLAC has determined that a structure that is 50 years old is not historically significant. Additionally, a structure that has been declared to be a historical landmark in compliance with a resolution of the Board may be enlarged, extended, reconstructed, relocated, and/or structurally altered provided the County HLAC has reviewed and approved the proposed structural alterations and has determined that the proposed structural alterations will help to preserve and maintain the landmark in the long-term (LUDC Section 35.101.020).

[2] Places of Historic Merit are recognized as having historic, aesthetic, or cultural value; however, they are not protected by restrictions as to demolition, removal, alteration, or use like Historic Landmarks are, which are recognized at a higher level of historic, aesthetic, or cultural significance.

County Coastal Land Use Plan

The County's Coastal Land Use Plan (CLUP) contains the following policies addressing cultural resources:

- **Policy 10-1**: All available measures (e.g., purchase, tax relief, purchase of development rights) shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.
- **Policy 10-2**: When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.
- **Policy 10-3**: When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accordance with the guidelines of the State OHP and the State NAHC.
- **Policy 10-4**: Off-road vehicle use, unauthorized collecting of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.
- **Policy 10-5**: Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

The CLUP sets forth the following recommendations to ensure that important historical sites in the Coastal Zone are protected (pg. 150):

1. The County should undertake an inventory of historical sites in the unincorporated areas of the County.
2. Significant sites should be designated as landmarks by the County Advisory Landmark Committee and restrictions imposed as currently permitted by County Ordinance No. 1716.
3. Historic sites of national significance should be nominated for landmark status by the NHLs Project and the NRHP. Those of statewide significance should be nominated for inclusion on the register of CHLs.

Owners of historical sites meeting the criteria specified in Sections 50280-50289 of the Government Code should be encouraged to enter into historical properties contracts with the County (the contract gives the owner the benefit of assessment based on restricted use of the property) it insures permanent preservation of significant sites.

County Coastal Zoning Ordinance

Article II of Chapter 35 of the County Code consists of the Santa Barbara County Coastal Zoning Ordinance (CZO), published in January 2014 and updated in May 2021. Section 35-65 of the CZO includes the following policies that protect archaeological resources, as well as Policies 10-2, 10-3, and 10-5 from the CLUP:

1. When developments are proposed for lots where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.

2. When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with the guidelines of the State OHP and the State NAHC.
3. Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

3.5.4 Environmental Impact Analysis

This section discusses the potential cultural resource impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.5.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to cultural resources if it would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section15064.5
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section15064.5
c. Disturb any human remains, including those interred outside of dedicated cemeteries

Further, implementation of the proposed Project may have a significant adverse impact relating to tribal cultural resources if it would:

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
    ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivisiI(c) of PRC Section 5024.1. In applying the criteria set forth in subdivIon (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2021c) provides guidance for assessing the significance or importance of archaeological, historical, and tribal cultural resources. For determining the significance of impacts under CEQA, the County's thresholds defer to the thresholds of CEQA. Specifically, the significance of impacts on cultural resources should be evaluated

pursuant to CEQA Sections 21084.1 and Section 15064.5. The significance of impacts to tribal cultural resources should be evaluated pursuant to CEQA Section 21084.2.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies future potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. As a result, the impact analysis provided below does not evaluate potential impacts on cultural or tribal cultural resources at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for lower- and moderate-income units. This programmatic analysis reviews potential impacts anticipated to be enabled under the Housing Element Update and considers whether these changes would directly or indirectly affect cultural and tribal cultural resources within unincorporated areas of the county.

Impacts on cultural resources and tribal cultural resources would be unique to individual residential developments on specific sites. The sites inventory provided as part of the Housing Element Update indicates where housing developments may occur under the proposed Project and informs this environmental impact analysis. The cultural resources impact assessment generally compares the location of potential residential and mixed use developments to the location of known cultural resources or areas with a high potential for cultural resources. However, as noted above, a complete analysis of potential impacts is not possible as site-specific development plans and site-specific cultural resource inventories and evaluations of significance are generally unavailable.

The information and analysis in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This programmatic analysis is supported by the review of existing adopted plans, public databases, and recent studies, to assess potential impacts to cultural and tribal cultural resources. In particular, the County Comprehensive Plan, 1997 Orcutt Community Plan (County of Santa Barbara 1997), 2015 Eastern Goleta Valley Community Plan (County of Santa Barbara 2015), and associated program EIRs were key information sources. The discussion of cultural resources was broadly derived from the above sources, as well as the National Park Service's NRHP, the National Park Service's California NHLs, the State OHP's CHLs, and the County HLAC's resources for County Landmarks and Places of Historic Merit.

3.5.4.2 Project Impacts

Table 3.5-4 provides a summary of the proposed Project's impacts related to cultural and tribal cultural resources. A detailed discussion of each impact follows.

Table 3.5-4. Summary of Cultural Resources Impacts

Cultural and Tribal Cultural Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact CTCR-1. The proposed Project could occur in or near previously unevaluated historic properties and could cause physical demolition, destruction, relocation, or alteration of historical resources.	Potentially significant	MM CTCR-1 (Historic Resource Preservation)	Significant but mitigable
Impact CTCR-2. The proposed Project could cause disruption, alteration, destruction, or adverse effects on significant archaeological resources.	Potentially significant	MM CTCR-2 (Archaeological Resource Protection) MM CTCR-3 (Stop Work at Encounter)	Significant but mitigable
Impact CTCR-3. The proposed Project could disrupt human remains, including those interred outside of formal cemeteries.	Potentially significant	MM CTCR-3 (Stop Work at Encounter) MM CTCR-4 (Encountering Human Remains)	Significant but mitigable
Impact CTCR-4. The proposed Project could cause disruption, alteration, destruction, or adverse effects on significant tribal cultural resources.	Potentially significant	MM CTCR-2 (Archaeological Resource Protection) MM CTCR-3 (Stop Work at Encounter) MM CTCR-4 (Encountering Human Remains) ~~MM CTCR-5 (Tribal Cultural Resource Protection)~~	Significant but mitigable
Cumulative Impacts	Potentially significant	MM CTCR-1 (Historic Resource Preservation) MM CTCR-2 (Archaeological Resource Protection) MM CTCR-3 (Stop Work at Encounter) MM CTCR-4 (Encountering Human Remains) ~~MM CTCR-5 (Post-Discovery Tribal Consultation)~~	Significant but mitigable

Impact CTCR-1. The proposed Project could occur in or near previously unevaluated historic resources and could cause physical demolition, destruction, relocation, or alteration of historic resources.

As described in Section 3.5.2, *Environmental Setting*, there are 31 NRHP-listed historic properties, 4 CHLs, 31 historic landmarks, 31 County-designated historic landmarks, and 22 County-designated places of historic merit located in the unincorporated county. Additionally, an unknown number of historic resources (i.e., structure, property, or subsurface remains that are at least 50 years old) occur across the county and remain unlisted. Potential impacts to historic resources could occur if future residential and mixed use development enabled under the proposed Project would cause a substantial adverse change in the characteristics that make the historic resource important under CEQA, or otherwise cause an adverse physical or aesthetic impact on a structure, property, or subsurface remains (e.g., build foundations) that are at least 50 years old and/or historic to the community, state, or nation under federal, state, and/or County policies and regulations.

The Housing Element Update identifies potentially suitable housing sites necessary to meet the RNHA plus the 15 percent buffer. The Housing Element Update does not identify or include any proposed housing sites with known historic resources. However, three county historic landmarks and two places of historic merit, including the Pine Grove Cemetery in Orcutt, the Sisquoc store in Sisquoc, the Hitching Post in Casmalia, Lane Family Main Farm House and Cottage in Eastern Goleta Valley, and William and Lydia Davis House in Los Olivos, are located adjacent to a potential future housing site identified by the proposed Project. In addition, future residential and mixed use development under the proposed Project may occur on several sites with structures that could be eligible for historic designation but have not been evaluated or listed. For example, the proposed Project's potential housing sites include several potential rezone sites that are developed with structures that may have been built before 1970, such as Site No. 17 (Montessori). If future demolition and/or redevelopment resulting from the proposed Project were to occur on a site with a structure that has not yet been evaluated or identified as a historic resource, the proposed Project could demolish or damage the resource, or adversely affect the character-defining features and alter or undermine the historic value of the resource. Further, activities associated with construction, such as the operation of heavy equipment, land clearing, excavation, and grading that are either near properties that are known historic resources, or areas that may support subsurface historic resources, may adversely affect the historic structure or subsurface resources, which may diminish their historic value.

As described above, federal, state, and County policies and regulations (e.g., Section 35.60.040 of the County LUDC) preserve and protect historic resources by requiring avoidance of impacts to significant historical resources, including the County Comprehensive Plan, community plans, LUDC, CLUP, and CZO (Section 3.5.3, *Regulatory Setting*). Future development enabled under the Housing Element Update would be required to adhere to these policies and regulations on a case-by-case basis during County review of individual permit applications. Adherence to these policies and regulations would reduce any adverse effects on known historic resources.

However, structures or subsurface remains that may be eligible as historic resources but are currently unknown do not currently require preliminary review to determine whether adverse effects may result from potential uses and related development. While many future development projects would be subject to adherence with policies and regulations to ensure avoidance of impacts to potentially unknown historic resources through site-specific environmental review, the Housing Element Update would allow use-by-right for housing projects with 20 percent of the units affordable to lower-income households and zoned at a residential density allowing at least 20 du/ac (Program 2 of the Housing

Element Update). Eligible use-by-right projects would not be subject to the County's discretionary permit requirements and procedures to mitigate impacts to unknown historic resources. Therefore, the proposed Project would have *potentially significant* impacts on eligible historic resources that are currently unknown and would require implementation of **MM CTCR-1 (Historic Resource Preservation)** to reduce potential impacts to a *significant but mitigable* level.

Impact CTCR-2. The proposed Project could cause disruption, alteration, destruction, or adverse effects on significant archaeological resources.

As described in Section 3.5.2, *Environmental Setting*, prehistoric and historic archaeological resources of cultural significance to a community or ethnic group, such as the Chumash, have the potential to occur throughout the unincorporated county, including Solomon/Orcutt Creek in Orcutt, and drainages, bluffs, and estuaries, including Goleta Slough and its tributaries in Eastern Goleta Valley. Future development enabled under the Housing Element Update could involve physical development or alteration of lands (e.g., grading of a site or the construction of new structures) that could disrupt or disturb undiscovered archaeological resources that are culturally significant under CEQA.

The proposed Project could have a potentially adverse effect on archaeological resources if the resulting residential development were in an area where resources are either present, unknown, or have a high potential to exist. Development on vacant undisturbed sites, particularly in Orcutt and Eastern Goleta Valley, would have a greater potential for disturbance of undiscovered archaeological resources than on previously disturbed sites. This would be particularly true in areas located near creek beds, bluffs, and estuaries, which have a greater likelihood of supporting early habitation and use by Native Americans. Based on the sites inventory prepared for the Housing Element Update, there are 211 existing vacant sites in North County and 159 vacant sites on the South Coast. Additionally, there are 15 potential rezone sites and three pending housing project sites on undeveloped properties in the North County, and two potential rezone sites, three pending housing projects, and one potential County-owned site on undeveloped properties in the South Coast. These housing sites would be more likely than others to contain or be proximate to archeological resources given that resources have been undisturbed by past development or uses. For example, Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in Orcutt are undeveloped and located along Orcutt Creek and, therefore, may overlie or be in proximity to potentially archaeologically sensitive areas. Agricultural sites may also retain archaeological potential depending on the extent and type of disturbance from agricultural activities. Based on the sites inventory, there is one agricultural site in the North County and 14 agricultural sites in the South County that are disturbed by agricultural activities (e.g., tilling, greenhouses, irrigation) but may retain archeological resources in undisturbed or lightly disturbed areas of the sites, particularly along drainage courses or other higher-potential areas. However, only further site-specific investigation would reveal the archeological potential of specific undeveloped housing sites.

As described in Section 3.5.3, *Regulatory Setting*, the objectives and policies in the County Comprehensive Plan, community plans, LUDC, CLUP, and CZO require avoidance of impacts to known archaeological resources. Further, the County's *Environmental Thresholds and Guidelines Manual* requires that the likelihood of buried or unknown archaeological resources be considered, and Phase I and II archaeological studies be performed for projects subject to County permits and CEQA, if necessary. For housing projects subject to the County's permitting process, including the development of existing vacant sites subject to existing zoning standards, County P&D will make an initial request for property-specific information from the CCIC. If a cultural resources survey is required, the applicant will be informed at project scoping. The owner/applicant will then retain a professional

cultural resources consultant who will conduct a full record search at the CCIC prior to surveying the property for cultural resources. The owner/applicant would then conduct a Phase I survey and additional progressive investigations (i.e., Phase II and Phase III surveys), if necessary (County of Santa Barbara 2021c). These requirements would apply to all future development projects enabled under the Housing Element Update that would be subject to County permits and the P&D's project review and approval process. Adherence to these existing regulations when evaluating discretionary permit applications would address potential Project impacts on archaeological resources.

However, the Housing Element Update would allow use-by-right for housing projects with 20 percent of the units affordable to lower-income households and zoned at a residential density allowing at least 20 du/ac (Program 2 of the Housing Element Update). Eligible use-by-right projects would not be subject to the County's discretionary permit requirements and procedures to mitigate cultural resource impacts. Specifically, under Program 2, Use by-Right Approval, certain housing development projects may be processed through a building permit process not subject to a development plan (DVP), conditional use permit (CUP), or other discretionary review or approval or environmental review under CEQA. Without these procedures requiring the investigation and mitigation of impacts on cultural resources, there exists the likelihood that housing development projects on undeveloped sites may cause substantial adverse changes to known and unknown resources. Therefore, impacts are considered *potentially significant.* To address this potential impact, **MM CTCR-2 (Archaeological Resource Protection)** and **MM CTCR-3 (Stop Work at Encounter)** would be required to ensure by-right housing development projects investigate, document, and mitigate impacts to known and unknown archeological resources onsite or in the vicinity of the site. As a result, archaeological resources would be protected and impacts would be reduced to a *significant but mitigable* level.

Impact CTCR-3. The proposed Project could disrupt any human remains, including those interred outside of dedicated cemeteries.

As described in Impact CTCR-1 and Impact CTCR-2, the proposed Project would result in the development and/or rezoning of some housing sites that have previously been developed/disturbed and have a lower potential for cultural resources to be disturbed, including human remains; however, other housing sites are undisturbed and have the potential to support prehistoric activity or occupation. New development of undisturbed or vacant properties, including agricultural properties, such as Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in Orcutt and Rezone Site No. 12 (St. Vincent's East) and No. 13 (St. Vincent's West) in the South Coast would have a greater potential for disturbance of undiscovered human remains than on previously disturbed land. The possibility of discovering human remains during construction-related activities associated with housing development is considered low, but not impossible. Thus, *potentially significant* impacts on human remains could occur depending on the proposed activity and whether development or grading would occur in previously undisturbed areas. If unidentified human remains are discovered, further disturbances and construction activities shall stop in any area or nearby area suspected to overlie remains in accordance with State Health and Safety Code Section 7050.5, and the Santa Barbara County Coroner shall be contacted in accordance with Title 14, CCR Section 15064.5I. Pursuant to PRC Section 5097.98, if the coroner determines that the human remains are of Native American origin, the NAHC shall be notified. Arrangements for the human remains shall be made, and further provisions of PRC Section 5097.98 shall be followed as applicable. Further, the required implementation of **MM CTCR-3 (Stop Work at Encounter)**, and **MM CTCR-4 (Encountering Human Remains)** would reduce impacts to a *significant but mitigable* impact level.

Impact CTCR-4. The proposed Project could cause disruption, alteration, destruction, or adverse effects on significant tribal cultural resources.

As described in Section 3.5.2.4, *Known Cultural Resources in Santa Barbara County*, tribal cultural resources may include cultural landscapes, sacred places, and Native American archaeological sites. The County has not received requests from any Native American tribe for government-to-government consultation associated with the proposed Project, pursuant to PRC Section 21080.3.1 and AB 52. Nevertheless, this analysis considered the potential for tribal cultural resources to be affected by the proposed Project based on available resources and information.

As described under Impact CTCR-2, future potential residential and mixed use development resulting from the proposed Project could occur within sites of historic or cultural significance to the Chumash or other Native American tribes. While the proposed Project does not propose the alteration, demolition, or new construction of any individual housing development project, future actions associated with housing development may involve the construction of new structures, grading, operation of heavy equipment, and/or demolition of existing structures. These activities have the potential to uncover and/or disturb known and/or unknown tribal cultural resources.

The County's Comprehensive Plan, applicable community plans, LUDC, MLUDC, CLUP, and CZO require avoidance of impacts to prehistoric cultural resources and include requirements to protect cultural resources, including tribal cultural resources. Further, AB 52, PRC Section 21080.3.1, and Section 8 of the County's *Environmental Thresholds and Guidelines Manual* require CEQA projects to initiate consultation with tribes as part of the tribal cultural resource evaluation and assessment. As part of the consultation pursuant to PRC Section 21080.3.1, the involved parties may propose mitigation measures capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource. If the California Native American tribe requests consultation regarding alternatives to the project, recommended mitigation measures, or significant effects, the consultation shall include those topics. Adherence to these regulations by housing projects subject to the County's discretionary review and permitting process, as well as CEQA, would address potential Project impacts on tribal cultural resources.

However, as described in Impact CTCR-2, the Housing Element Update would allow use-by-right for housing projects with 20 percent of the units affordable to lower-income households and zoned at a residential density allowing at least 20 du/ac (Program 2 of the Housing Element Update). Eligible use-by-right projects would not be subject to the County's discretionary permit requirements and procedures to mitigate tribal cultural resource impacts. Specifically, under Program 2, Use by-Right Approval, certain housing development projects may be processed through a building permit process not subject to a DVP, CUP, or other discretionary review or approval or environmental review under CEQA. Without these procedures requiring the investigation and mitigation of impacts on cultural resources, there exists the likelihood that housing development projects on undeveloped sites may cause substantial adverse changes to known and unknown resources. Therefore, impacts are considered *potentially significant*. To address this potential impact, implementation of **MM CTCR-2 (Archaeological Surveys)** through **MM CTCR-4 (Encountering Human Remains)** ~~**MM CTCR-5 (Post-Discovery Tribal Consultation)**~~ would be required to ensure by-right housing development projects investigate, document, and mitigate impacts to known and unknown tribal cultural resources affected by site development. As a result, tribal cultural resources would be protected, and impacts would be reduced to a *significant but mitigable* level.

3.5.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding incorporated cities. Project impacts along with potential impacts from pending and current planning or development projects inform the cumulative impacts analysis. Cumulative projects as described in the Section 3.0.6, *Cumulative Impact Analyses* (Tables 3-6, 3-7, and 3-8; Appendix I), including pending projects in the unincorporated county, such as the Countywide Recreation Master Plan (Cumulative Project No. 12) and the Agriculture Enterprise Ordinance (Cumulative Project No. 14) that could enable future residential development in the unincorporated county, to individual projects, such as other cumulative residential development projects (Chapter 3, *Environmental Impact Analysis*). These cumulative projects could impact historic, archaeological, and tribal cultural resources within the Project area in combination with the housing development associated with the proposed Project. By implementing the Housing Element Update that would result in future residential and mixed use development to meet the RNHA plus the 15 percent buffer, cumulative new development may create a greater potential for ground disturbance across the county due to future development of previously undisturbed and undeveloped sites that historic, archaeological, and tribal cultural resources.

The proposed Project requires that future development, including major alternation to existing structures and/or new development, comply with existing County policies and regulations, as well as applicable mitigation measures. Future individual permit applications would be reviewed by the County to ensure compliance with the County Code Chapter 18A, the County Comprehensive Plan, applicable community plans, LUDC, MLUDC, CLUP, CZO, and Section 8 of the County's *Environmental Thresholds and Guidelines Manual* (2021), among others. A review of design, siting, and compliance with existing policies and regulations would reduce impacts on a project-by-project basis. In addition, the inclusion of mitigation measures **MM CTCR-1 (Historic Resource Preservation)** through **MM CTCR-4 (Encountering Human Remains)**~~**MM CTCR-5 (Post-Discovery Tribal Consultation)**~~ would address historic, archaeological, and tribal cultural resource impacts on a project-specific level for eligible use-by-right housing projects enabled under Program 2 of the Housing Element Update, which would reduce the cumulative contribution to potential impacts. Therefore, the contribution of the proposed Project to a cumulatively considerable impact on cultural, historic, and tribal cultural resources is considered to be *significant by mitigable.*

3.5.4.4 Proposed Mitigation

MM CTCR-1: Historic Resource Preservation. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include a Phase I historic resources report if they involve major alteration or demolition of buildings, structures, objects, or places that are generally more than 50 years old and: 1) listed or eligible for listing in the CRHR; 2) included in the County's list of Historic Landmarks or Places of Historic Merit under County Code Chapter 18A, Section 18A-3; or 3) determined by the County to be significant pursuant to criteria for listing on the CRHR (PRC Section 5024.1). The Phase I report shall include a historic resources inventory and significance evaluation. However, multifamily housing projects that involve minimal interior or exterior modifications to existing structures shall not be required to prepare historic resource reports. Such development may include, but not be limited to, those that do not alter major building

features, such as minor roofing repairs with in-kind materials and minor electrical and plumbing improvements that do not involve major changes to interior or exterior walls.

If the Phase I report identifies potentially significant historic resources, the owner/applicant shall submit a Phase II report that assesses project impacts and formulates mitigation measures to avoid and preserve the resources through project design and preservation in place.

The owner/applicant shall submit a Phase III historic resources report if it is not possible for the project to completely avoid and preserve significant historic resources through project design and preservation in place. The Phase III report shall document the mitigation measures that were carried out and include all related documentation.

All required studies shall be prepared according to the requirements of the County's most current *Environmental Thresholds and Guidelines Manual* (Chapter 8, Guidelines for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). As needed, the historic resource studies shall identify appropriate protection standards to incorporate into the project design, including but not limited to the following:

1. For projects that affect historic structures or buildings, the project shall preserve, restore, and/or renovate the affected historic structures or buildings consistent with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (36 CFR Part 68, 1995) and *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (U.S. Department of the Interior 2017).
2. Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation, or documentation similar to HABS/HAER, is required for any project that would alter or destroy all or a portion of any significant historic resource.
3. For projects that affect historic objects or places, the project shall avoid and preserve the affected historic resources through project design or redesign and preservation in place.

   Requirements and Timing. The owner/applicant shall prepare and submit Phase I, Phase II, and/or Phase III historic resources reports as part of project application materials. County P&D shall review and confirm that all recommendations for historic resource preservation are reflected in project plans and permit requirements. All historic resource preservation standards and requirements shall be printed on all building and grading plans.

   Monitoring. County P&D compliance monitoring staff shall ensure compliance with Phase I, Phase II, and/or Phase III recommendations through approval of project plans, a site visit, and/or owner/applicant/contractor-provided photo documentation.

MM CTCR-2: Archaeological Resource Protection. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include any existing archaeological resource surveys or reports for the project site. If the project site has not been subject to an archaeological resource survey, or the prior survey does not satisfy the requirements of a Phase I investigation, the owner/applicant shall submit a Phase I archaeological resource report documenting any archaeological resources that adjoin or exist within the project site.

If the Phase I report indicates that archaeological resources adjoin or exist within the project site, the project shall avoid and preserve the resources through project design and preservation in place, or the owner/applicant shall submit a Phase II archaeological report that evaluates the significance of the archaeological resources and assesses the project's impacts. If the Phase II archaeological report indicates that the archaeological resources are significant, the owner/applicant shall formulate mitigation measures to avoid and preserve the resources through project design and preservation in place.

If the Phase II archaeological investigation finds that the archaeological resources are significant and potential impacts cannot be avoided through project design and preservation in place, the owner/applicant shall submit a Phase III archaeological report to carry out mitigation measures to recover, analyze, interpret, report, curate, and preserve archaeological data that would otherwise be lost due to unavoidable impacts to significant resources.

All required studies shall be prepared according to the requirements of the County's most current *Environmental Thresholds and Guidelines Manual* (Section 8, Guidelines for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). As needed, the archaeological resource studies shall identify appropriate protection standards to incorporate into the project design, including but not limited to the following:

1. In accordance with applicable cultural resource protection policies, development shall be located in areas on a lot that would avoid disturbance of known significant archaeological resources.

2. If significant archaeological resources are located within 60 meters (200 feet) of ground-disturbing activities, the archaeological site shall be fenced and appropriately protected during grading and construction.

3. For any work conducted within or near a significant archaeological site, an approved archaeologist and Native American observer, as appropriate, shall monitor the site during grading and construction (including abandonment).

4. An educational workshop shall be conducted for construction workers before and during construction.

Requirements and Timing. The Phase I, Phase II, and/or Phase III archaeological resource investigations and reports shall be prepared by the owner/applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations for archaeological resource protection are reflected in project plans and permit requirements, and consistent with applicable cultural resource protection policies. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted by the owner/applicant on project plans and submitted to County P&D for review and approval before issuance of final approvals or permits by the County. All archaeological resource protection standards and requirements shall be printed on all building and grading plans.

Monitoring. County P&D shall ensure that the archaeological resource report(s) is included as part of the project application and that all archaeological resource protection standards are reflected in project plans. The owner/applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground

disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved archaeological resource protection plan.

MM CTRC-3: Stop Work at Encounter. For future residential and mixed use development resulting from the proposed Project and involving ground disturbance, the owner/applicant and/or their agents, representatives, or contractors shall stop or redirect work immediately in the event archaeological, historic, or tribal cultural resources are encountered during grading, construction, landscaping, or other construction-related activity. The owner/applicant shall immediately contact P&D. A P&D-approved archaeologist and Native American representative shall evaluate the significance of the find in compliance with the provisions of state law and the County's most current *Environmental Thresholds and Guidelines Manual* (Section 8, Guidelines for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). Appropriate mitigation to protect and preserve significant archaeological, historic, or tribal cultural resources encountered during construction shall be required and funded by the owner/applicant.

Requirements and Timing: County P&D shall confirm that this cultural resource protection standard shall be printed on all building and grading plans.

Monitoring: County P&D permit processing planner shall check plans before the issuance of a permit for the proposed uses and related development. P&D compliance monitoring staff shall spot-check in the field throughout grading and construction.

MM CTCR-4: Encountering Human Remains. For future residential and mixed use development resulting from the proposed Project and involving ground disturbance, if human remains are accidentally discovered or recognized during construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the most likely descendent of the deceased Native American, who shall help determine what course of action should be taken in dealing with the remains. Per PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC Section 5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

Requirements and Timing. If human remains are discovered, construction activities shall stop immediately. The owner/applicant shall immediately contact County P&D permit compliance staff, who would be responsible for contacting the County Coroner. These cultural resource protection standards shall be printed on all building and grading plans.

Monitoring: County P&D permit compliance staff shall ensure that no further disturbance shall occur until the County Coroner has made all necessary findings as to origin and disposition pursuant to PRC Section 5097.98.

~~**MM CTCR-5: Post-Discovery Tribal Consultation.** For future residential and mixed use development resulting from the proposed Project, if tribal cultural resources are identified or~~

~~discovered during construction, landscaping, or other construction-related activities, the owner/applicant and/or their agents, representatives, or contractors shall immediately contact P&D. P&D shall coordinate consultation with a Native American tribal representative. The appropriate Native American tribal representative shall be identified using the most recent contact list provided by the NAHC. If mitigation actions are required through consultation with the Native American tribal representative, appropriate mitigation shall be funded by the owner/applicant.~~

~~Requirements and Timing:~~ ~~If tribal cultural resources are discovered, construction activities shall stop immediately. The owner/applicant/owner shall immediately contact County P&D permit compliance staff, who would consult with a Native American tribal representative. This condition shall be printed on all building and grading plans.~~

~~Monitoring:~~ ~~County P&D permit compliance staff shall ensure that no further disturbance shall occur via periodic site visits and other appropriate measures until consultation with a Native American tribal representative is complete and any site-specific mitigation has been identified and implemented.~~

3.5.4.5 Secondary Impacts

Implementation of **MM CTCR-1** through **MM CTCR-4~~5~~** would have the potential to create significant secondary impacts associated with changes in visual resources, and land use compatibility. Archaeological surveys performed for future development projects may identify recommendations or further measures to avoid newly discovered archaeological and tribal cultural resources. In particular, where archaeological resources, tribal cultural resources, or Native American human remains are discovered, recommendations may include requirements for siting development away from a known resource as part of requirements for avoidance of impacts. In such an event, onsite developable acreage could be reduced and higher-density sites may need to propose taller multiple-story development projects of four stories or more to meet maximum and perhaps even minimum densities to achieve Housing Element Update goals, policies, and programs. Such potential impacts are discussed more fully in Section 3.1, *Aesthetics and Visual Resources*.

3.5.4.6 Residual Impacts

Impact CTCR-1. Implementation of **MM CTCR-1 (Historic Resource Preservation)** would ensure the completion of a historic architectural review and/or historical documentation for any significant historic resource proposed for major modifications to support one or more of the potential residential developments enabled by the proposed Project. This would ensure that significant historical resources retain the features that may contribute to their eligibility as local, state, or federal historical resources. Therefore, residual impacts associated with Impact CTCR-1 would be a *significant but mitigable impact*.

Impact CTCR-2. Implementation of **MM CTCR-2 (Archaeological Resource Protection)** would ensure that future residential and mixed use development involving grading or other ground-disturbing activities do not significantly impact known archaeological resources. Implementation of **MM CTCR-3 (Stop Work at Encounter)** and **MM CTCR-4 (Encountering Human Remains)** would ensure appropriate measures are taken in the event of inadvertent discovery of a resource such that potential residential and mixed use development allowed under the proposed Project does not significantly impact unknown archaeological resources. Therefore, residual impacts associated with Impact CTCR-2 would be a *significant but mitigable* impact.

Impact CTCR-3. Implementation of **MM CTCR-3 (Stop Work at Encounter)** and **MM CTCR-4 (Encountering Human Remains)** would ensure appropriate measures are taken in the event of inadvertent discovery of archaeological resources, tribal cultural resources, or human remains, respectively, such that proposed uses and related development allowed for under the proposed Project do not significantly impact unknown archaeological resources, tribal cultural resources, or Native American human remains. Therefore, residual impacts associated with Impact CTCR-3 would be a *significant but mitigable* impact.

Impact CTCR-4. Implementation of **MM CTCR-2 (Archaeological Surveys)**, **MM CTCR-3 (Stop Work at Encounter)**, and **MM CTCR-4 (Encountering Human Remains)~~, and MM CTCR-5 (Post-Discovery Tribal Consultation)~~** would ensure appropriate measures are taken in the event of inadvertent discovery of archaeological resources, tribal cultural resources, or Native American human remains such that proposed residential development allowed for under the Project do not significantly impact such resources and remains. Therefore, residual impacts associated with Impact CTCR-4 would be a *significant but mitigable* impact.

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Section 3.6
Energy

3.6.1 Introduction

This section describes potential impacts related to energy usage and conservation, as well as potential inconsistencies with relevant energy reduction and sustainability plans and policies, that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by County of Santa Barbara (County). The discussion of energy resources includes electricity, natural gas, gasoline, and other transportation-related fuels (e.g., diesel fuel), and renewable energy resources.

3.6.2 Environmental Setting

Santa Barbara County residents receive energy from a range of renewable and non-renewable sources, consisting primarily of electric power, natural gas, and transportation-related fuels (e.g., gasoline and diesel). State and local governments and private entities provide a range of energy services to the residents of the county, as described herein.

3.6.2.1 Electricity

The production of electricity within the state requires the consumption or conversion of energy resources, including natural gas, coal, water, nuclear, and renewable resources, such as wind, solar, and geothermal. Over the past five years, non-residential electricity consumption has gradually declined in both the state and county, while residential electricity consumption has gradually increased. In 2022, Californians consumed 287,826.1 million kilowatt hours (kWh), or 2,878.3 gigawatt-hours (GWh), of electricity across the residential and non-residential sectors, an approximate 2.1 percent increase from the prior five years. In 2022, Santa Barbara County, inclusive of the incorporated cities and unincorporated areas, consumed 2,804.1 GWh of electricity across the residential and non-residential sectors, an approximate 0.6 percent reduction from the prior five years. Of the countywide 2022 electricity consumption, about 830 GWh were residential and about 1,974 GWh were non-residential (California Energy Commission [CEC] 2023c) (Table 3.6-1).[1]

[1] Electricity and natural gas consumption as reported by CEC for Santa Barbara County, which includes incorporated and unincorporated areas.

Table 3.6-1. Statewide and Countywide Electricity Demand 2018-2022 (Millions of kWh [GWh])

Year	Statewide		Countywide	
	Non-residential	Residential	Non-residential	Residential
2018	190,224.17	91,763.94	2,063.61	757.96
2019	188,614.06	92,727.36	1,983.99	787.96
2020	175,687.23	102,948.67	1,903.36	837.61
2021	179,640.31	100,539.57	1,931.89	812.87
2022	184,229.93	103,596.19	1,974.15	829.97

Sources: CEC 2023c.

In 2022, California's in-state electric power mix included 47.5 percent generated by natural gas-fired power plants, 0.1 percent generated by coal-fired power plants, 7.2 percent from large hydroelectric dams, 0.2 percent generated by oil and other petroleum or waste heat, and 8.7 percent from nuclear power plants. The remaining 36.3 percent of electricity production in California was supplied by renewable sources, including biomass, geothermal, small hydroelectric, solar, and wind power (CEC 2023b).

Santa Barbara County receives electricity services from two energy service providers: Pacific Gas & Electric Company (PG&E) in North County (Santa Maria, Cuyama, Lompoc, and Santa Ynez) and Southern California Edison (SCE) on the South Coast. Within the PG&E total service territory, electrical power is generated by renewable (30 percent), natural gas (25 percent), and nuclear (23 percent) sources (PG&E 2022). Within the SCE total service territory, electrical power is generated by natural gas (26 percent) and renewable sources (25 percent), with the majority of its supply sources associated with non-traceable electrical transactions (41 percent)[2] (SCE 2022). Large-scale solar facilities in the Cuyama Valley are the sole-source of electricity generation and provide energy to PG&E within the North County. On the South Coast, there exists the Ellwood backup natural gas power electrical plant in the City of Goleta, which is a "peaker plant" designed to provide electricity to the South Coast during disruption of SCE transmission from Ventura County. However, due to unknown reasons, the plant has not functioned as a reliable emergency power generator and the existing and future operation of the facility is currently under investigation (County of Santa Barbara 2019).

Within the county, the transmission grid is designed to carry electricity over large distances, connecting large utility-scale power plants to load centers, such as cities and suburban communities. The grid is owned and operated by SCE and PG&E within their respective service territories with maintenance and period upgrades provided, as needed. Because the county lies at the border between SCE and PG&E electric service territories in the state, residents and businesses are vulnerable to electric outages as the respective grids have more limited resilience and backup capability (County of Santa Barbara 2019). The county's location at the end of each utility's electrical distribution system additionally causes lower grid reliability because most of the utility generation is coming from only one direction for each utility, creating a "cul-de-sac" effect in both the North County and South Coast. The county's electricity transmission grid includes lines of three voltage levels: 220 kilovolts (kV), 115 kV, and 60/66kV. Higher voltage lines (i.e., 220kV and 115kV) can carry more electricity than the lower voltage lines (i.e., 60/66kV) and therefore are particularly important. The sole 220kV line in the county lies in the South Coast and the North County comprises the majority of 115kV lines

[2] Non-traceable transactions relate to unspecified electricity supplies that have been purchased through open market transactions which cannot be traced to a specific generation source.

(Figure 3.6-1). The electricity distribution grid connects to the transmission grid and carries electricity directly to buildings. Disruptions to the few key transmission lines in the county are more impactful than in other locations, increasing the likelihood of outages and increasing the downtime when outages do occur (County of Santa Barbara 2019).

As a result of constraints in the existing electrical grid and to reduce air pollutant and greenhouse gas (GHG) emissions, the County is actively taking steps to improve the resiliency and sustainability of the electric grid. In 2019, Santa Barbara County joined Central Coast Community Energy (3CE), a community choice energy agency established by public agencies to source clean and renewable electricity. As the owners of the transmission grid, PG&E and SCE continue to play their traditional role of delivering power and have partnered with 3CE to deliver 3CE clean energy supplies to enrolled customers within the county, maintain the electric infrastructure, and continue to handle customer billing. Under 3CE's program, customers may opt to enroll in either the 3CE Choice Program or the 3CE Prime Program. The 3CE Choice Program is the default service offering electricity sourced from 38.4 percent eligible renewable sources, 11.8 percent from large hydroelectric, and 49.8 percent from non-traceable electrical transactions. The 3CE Prime Program offers electricity sourced from 100 percent renewable solar (50 percent) and wind (50 percent) sources (3CE 2022). 3CE has committed to sourcing 100 percent clean and renewable energy by 2030. In its first two years of operations, 3CE has contracted for 453.3 megawatts (MW) of long-term eligible renewable resources and 192.7 MW of battery storage (3CE 2023).

In addition to joining the 3CE, the County has taken the following steps to improve resiliency and sustainability:

- Adopt the Zero Net Energy Ordinance requiring all new county facilities designed after 2025 to produce more energy than they consume, using a combination of renewable energy sources and increased energy efficiency.
- Delivering energy efficiency programs through the Tri-County Regional Energy Network (3C-REN), a partnership with San Luis Obispo and Ventura Counties.
- Supporting local commercial and municipal facilities in planning for increased energy resilience.
- Adopting the Strategic Energy Plan to address resiliency concerns and which identifies total resource potential for a variety of renewable energies, creates a list of priority sites for renewable energy development throughout the county, and develops a set of strategies for tackling barriers to renewable energy (County of Santa Barbara 2019).

Figure 3.6-1. Santa Barbara County Electrical Transmission Grid



Source: County of Santa Barbara 2019.

3.6.2.2 Natural Gas

Natural gas services within the county are provided entirely by the Southern California Gas Company (SoCalGas). Natural gas is a fossil fuel formed when layers of buried organic matter are exposed to intense heat and pressure over thousands of years. The energy is stored in the form of hydrocarbon and can be extracted in the form of natural gas, which can be combusted to generate electricity, enabling this stored energy to be transformed into usable power or to be used directly for heating, cooking, and other uses.

Over the past five years, non-residential natural gas consumption has gradually decreased in the state and has remained relatively consistent in the county. Residential natural gas consumption has gradually increased in both the state and county. In 2022, Californians consumed 11,710.64 million therms of gas across the non-residential and residential sectors, an approximate 5.2 percent reduction since 2018. In comparison, Santa Barbara County, inclusive of incorporated cities and unincorporated areas, consumed 129.15 million therms of gas in 2022, an approximate 3.4 percent increase since 2018. Of the county's 2022 gas consumption, 58.4 million therms were consumed by the residential sector and 70.75 million therms were consumed by the non-residential sector (CEC 2023e) (Table 3.6-2).

Table 3.6-2. Statewide and Countywide Natural Gas Demand 2018-2022 (Millions of therms)

Year	Statewide		Countywide	
	Non-residential	Residential	Non-residential	Residential
2018	7,949.64	4,394.40	70.37	54.48
2019	7,985.16	4,793.79	77.58	59.73
2020	7,202.88	4,780.81	64.01	60.03
2021	7,327.42	4,595.56	71.37	59.41
2022	7,166.07	4,544.57	70.75	58.40

Sources: CEC 2023e.

SoCalGas provides natural gas to 21.8 million consumers through 5.9 million meters in more than 500 communities. The company's service territory includes communities throughout Central California and Southern California, from Visalia to the Mexican border (SoCalGas 2023). The county is located in SoCalGas' North Coastal and Coastal Systems. Natural gas is delivered by SoCalGas from in-state and out-of-state suppliers and delivered to the county through its integrated gas pipeline system. SoCalGas is responsible for maintenance and periodic upgrades to the natural gas distribution system, as needed.

3.6.2.3 Petroleum and Transportation Energy

Transportation energy demand in California is largely related to vehicular traffic (e.g., passenger vehicles, light duty trucks, semi-trucks, etc.) with the majority of transportation-related energy demand currently met by gasoline and diesel fuel. Gasoline and diesel fuel are supplied to county residents by a widely distributed series of service stations. The California Department of Transportation (Caltrans) reports that approximately 36.2 million automobiles were registered in the state in 2021, resulting in a total estimated 310.9 billion vehicle miles traveled (VMT) (Caltrans 2022, 2023). Within the county, an estimated 3.1 billion VMT were traveled in 2021, accounting for approximately 0.9 percent of the state's total VMT.

Over the past five years, gasoline fuel sales have gradually declined in both the state and county, while diesel fuel sales have increased statewide and slightly decreased in the county. In 2022, California purchased an estimated 13.6 billion gallons of gasoline and 2.3 billion gallons of diesel fuel. In the same year, gasoline and diesel fuel sales in Santa Barbara County are estimated at 170 million gallons and 22 million gallons, respectively, which equates to approximately 1.3 percent of statewide gasoline sales and 1.0 percent of statewide diesel fuel sales (CEC 2023a) (Table 3.6-3).

Table 3.6-3. State and County Transportation Fuel Demand 2018-2022 (millions of gallons)

Year	Statewide		Countywide	
	Gasoline	Diesel	Gasoline	Diesel
2018	15.47	1.78	191	24
2019	15.37	1.76	177	19
2020	12.57	1.74	146	17
2021	13.82	1.88	168	17
2022	13.64	2.29	170	22

Source: CEC 2023a.

3.6.2.4 Energy Conservation and Renewable Resources

Appendix F, *Energy Conservation* of the California Environmental Quality Act (CEQA) Guidelines expresses the goal of conserving energy in the State of California and guides the analysis of energy impacts. Under CEQA (Public Resources Code Section 21100[b][3]), Environmental Impact Reports (EIRs) must include a discussion of the potentially significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F lists the following methods to achieve this goal: 1) decreasing overall per capita energy consumption; 2) decreasing reliance on natural gas and oil; and 3) increasing reliance on renewable energy sources. In addition to building code compliance, relevant considerations may include, among others, the project size, location, orientation, equipment use, and any renewable energy features that are incorporated into the project (CEQA Guidelines Section 15126.2[b]).

Energy conservation plays a key role in statewide, regional, and County efforts to reduce the reliance on non-renewable energy sources such as fossil fuels and to reduce the level of greenhouse gases (GHGs), as well as the adverse effects of climate change. Energy conservation measures include a range of approaches such as optimizing building design to reduce heating and cooling energy uses at residential, mixed-use, and commercial developments, reducing single occupancy vehicle use, encouraging a transition to hybrid and electric vehicles, etc. As described further in Section 3.6.3, *Regulation Setting*, energy conservation measures at the County level are guided and often required through both state legislation and County plans and ordinances. Key state legislation that requires energy conservation includes Senate Bill (SB) 350, which requires the state to double statewide energy efficiency savings in electricity and natural gas use by 2030, and the California Building Code (CBC) requires increased energy efficiency and conservation structures. SB 100 established that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by the end of 2045. As described above, at the local level, the County has adopted the Strategic Energy Plan, the key objectives of which are to help identify measures to help the County meet aggressive state and local emissions reduction goals and improve the resiliency of the local electrical grid. In addition, improvements in sustainability and energy conservation have been made by the County through participation in the 3CE program, adoption of the Zero Net Energy Ordinance, partnership in the 3C-REN program, and supporting local commercial and municipal facilities in planning for increased energy efficiency. The 2015 County Energy and Climate Action Plan (ECAP) also includes action items that would increase renewable energy within the county, including providing low-interest loans for alternative energy technology, encouraging the use of anaerobic digesters in agriculture, wastewater treatment, and solid waste management, attracting businesses that develop or market alternative energy technologies, and developing a solar photovoltaic ready construction ordinance (County of Santa Barbara 2015). The increase in private solar infrastructure use throughout the county has offset a limited amount of energy use associated with new development in the county.

Appendix F, *Energy Conservation* of the CEQA Guidelines expresses the goal of conserving energy in the State of California and guides the analysis of energy impacts. Under CEQA (Public Resources Code Section 21100[b][3]), EIRs must include a discussion of the potentially significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F lists the following methods to achieve this goal: 1) decreasing overall per capita energy consumption; 2) decreasing reliance on natural gas and oil; and 3) increasing reliance on renewable energy sources. In addition to building code compliance, relevant considerations may include, among others, the project size, location, orientation, equipment use, and

any renewable energy features that are incorporated into the project (CEQA Guidelines Section 15126.2[b]).

As identified in the Strategic Energy Plan, Santa Barbara County supports a large renewable energy potential for solar photovoltaic (PV), wind, hydrologic, and biomass. The Santa Barbara County region has a strong history of urban rooftop installations, and solar, by far, surpasses every other type of renewable energy potential with 1,700-2,925 GWh annual generation and potential to power 595,000-1,023,000 households. In urban areas, distributed renewable energy generally takes the form of solar energy systems installed on rooftops and carports. For the unincorporated county, commercial buildings account for 991 kW distributed solar capacity, and residential buildings account for 4,142 kW distributed solar capacity. The total county has a much higher percentage of commercial and industrial solar projects than the unincorporated county areas only, with roughly 40 percent of countywide potential being commercial and industrial for the entire county, compared to only 20 percent for the unincorporated county. This is to be expected due to incorporated cities having more commercial and industrial building spaces than unincorporated areas (County of Santa Barbara 2019).

3.6.3 Regulatory Setting

Federal, state, and local regulations have been enacted to address energy in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.6.3.1 Federal

At the federal level, the U.S. Environmental Protection Agency (USEPA), the U.S. Department of Energy, and the U.S. Department of Transportation are the three agencies with the most direct influence over national energy policies, especially transportation energy consumption. Generally, federal agencies establish and enforce fuel economy standards for automobiles and light trucks, fund energy-related research and development projects, and fund transportation infrastructure projects to manage transportation energy resource demand.

Vehicle Emissions Standards

In 2009, a national policy was adopted for fuel efficiency and emissions standards in the U.S. auto industry, which applies to passenger cars and light-duty trucks for model years 2012 to 2016 (referred to as the Pavley standards). The standards surpass the prior Corporate Average Fuel Economy standards and require an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016, based on USEPA calculation methods. In 2012, standards were adopted for model year 2017 to 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to the USEPA, a model year 2025 vehicle would emit approximately one-half of the GHG emissions from a model year 2010 vehicle. One April 12, 2023, the USEPA announced new, more ambitious proposed standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027 (USEPA 2023).

Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the U.S. Under the Act, the NHTSA is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624-63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the U.S.

Energy Policy Act of 1992

The Energy Policy Act of 1992 was passed to reduce U.S. dependence on foreign petroleum and improve air quality. The Energy Policy Act includes several provisions intended to build an inventory of alternative fuel vehicles in large, centrally fueled fleets in metropolitan areas. The Energy Policy Act requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty alternative fuel vehicles each year. Financial incentives were also included in the Energy Policy Act, such as federal tax deductions for businesses and individuals to cover the incremental cost of alternative fuel vehicles. States are also required by the Energy Policy Act to consider a variety of incentive programs to help promote the expansion of alternative fuel vehicle fleets.

Energy Star Program

In 1992, the USEPA introduced Energy Star as a voluntary labeling program to provide simple, credible, and unbiased information about energy efficiency to consumers. Under this program, appliances, commercial buildings, industrial plants, and/or homes that meet the program's energy management specifications are certified with the Energy Star label.

Energy Policy Act of 2005

The Energy Policy Act of 2005 includes provisions for renewed and expanded tax credits for electricity generated by qualified energy sources (i.e., landfill gas), provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification, and establishes a federal purchase requirement for renewable energy called the Renewable Fuels Standard (RFS).

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum. The USEPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the U.S. contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the U.S. As required under the Act, the original RFS program required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions in GHG emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of the renewable fuels sector in the U.S.

The EISA includes several key provisions that will increase energy efficiency and the availability of renewable energy, which will reduce GHG emissions as a result. The EISA facilitates the reduction of GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory RFS that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Achieving approximately 25 percent greater efficiency for light bulbs by phasing out old incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and,
- While superseded by the 2019 USEPA and NHTSA actions described above Section 3.3, *Air Quality*, the Act included: 1) establishing a minimum average fuel economy of 35 mpg for the combined fleet of cars and light trucks by 2020; and 2) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

3.6.3.2 State

California Energy Action Plan

In 2003, the California Public Utilities Commission (CPUC) and CEC adopted the Energy Action Plan (EAP), which represented the first time agencies described a single, unified approach to meeting California's energy needs. The EAP identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The overall goal of the plan is for the state's energy to be reliable, affordable, technologically advanced, and environmentally sound. In 2005, CPUC and CEC adopted the EAP II, which updated the energy policy vision and highlighted the importance of climate change. At the beginning of 2008, the CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based, in part, on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, the CEC and CPUC prepared an update that examines the state's ongoing actions in the context of global climate change.

Assembly Bill 2076 and Reducing California's Petroleum Dependence

Under Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), the CEC and California Air Resources Board (CARB) in 2003 adopted a joint-agency report, Reducing California's Petroleum Dependence. This report recommended to the Governor and Legislature: 1) adopt a statewide goal to reduce petroleum demand to 15 percent below 2003 on-road gasoline and diesel consumption levels by 2020; 2) work with the California delegation and other states to establish national fuel economy

standards that double fuel efficiency; and 3) establish a goal to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030.

Integrated Energy Policy Report

On April 29, 2015, Governor Edmund G. Brown Jr. signed Executive Order (EO) B-30-15, establishing a new statewide goal to reduce GHG emissions 40 percent below 1990 levels by 2030. SB 1389 (Bowen, Chapter 568, Statutes of 2002) requires CEC to prepare integrated energy policy reports that identify major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provide policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The 2022 Integrated Energy Policy Report Update, adopted by the CEC in 2023, provides the results of the CEC's assessments of a variety of energy issues facing California (CEC 2023d).

SB 1078 and SB 107

SB 1078 (2002) and SB 107 (2006) created the Renewable Energy Standard, which required electric utility companies to increase procurements from eligible renewable energy resources by at least 1 percent of their retail sales annually until reaching 20 percent by 2010. SB X1-2 (2011) requires an RPS, functionally the same thing as the Renewable Energy Standard, of 33 percent by 2020. In 2013, the statewide average for the three largest electrical suppliers (PG&E, SCE, and San Diego Gas & Electric) was 22.7 percent. As noted below, SB 350 increased the renewable requirement to 50 percent for 2030.

AB 1493

AB 1493 (Chapter 200, Statutes of 2002), known as the Pavley Bill, amended Health and Safety Code Section 42823 and added Section 43018.5. AB 1493 recognized climate change as a public health concern and motor vehicles as a major source of the state's GHG emissions. AB 1493 requires CARB to adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

AB 1007

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a state plan to increase the use of alternative transportation fuels in California. The State Alternative Fuels (SAF) Plan was prepared in partnership with CARB and in consultation with other federal, state, and local agencies. The SAF Plan considers the following policy goals: petroleum reduction, air quality, GHG reduction, and in-state biofuel production and use.

Bioenergy Action Plan, EO S-06-06

EO S-06-06 (2006) establishes targets for the use and production of biofuels and biopower and directs state agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The EO establishes the following target to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020,

and 75 percent by 2050. EO S-06-06 also calls for the state to meet a target for the use of biomass electricity.

The 2011 Bioenergy Action Plan identifies barriers to bioenergy and recommends actions to meet clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 Plan and provides a more detailed action plan to achieve the following goals:

- Increase environmentally and economically sustainable energy production from organic waste
- Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications
- Create jobs and stimulate economic development, especially in rural regions of the state
- Reduce fire danger, improve air and water quality, and reduce waste

SB 350

SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 under EO S-14-08 to 50 percent by 2030. This objective will increase the use of RPS-eligible resources, including solar, wind, biomass, geothermal, and others. SB 350 also requires the state to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. To help meet these goals and reduce GHG emissions, large utilities will be required to develop and submit Integrated Resource Plans (IRPs). These plans detail how utilities will meet their customers' resource needs, reduce GHG emissions, and increase the use of clean energy resources. SB 350 also transforms the California Independent System Operator, a nonprofit public corporation, into a regional organization, contingent upon approval from the state legislature. The bill also authorizes utilities to undertake transportation electrification.

SB 100

In 2018, SB 100 established that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by the end of 2045. SB 100 also creates new standards for the RPS, increasing required energy from renewable sources for both investor-owned utilities and publicly-owned utilities from 50 percent to 60 percent by the end of 2030. Incrementally, these energy providers must also have a renewable energy supply of 44 percent by the end of 2024, and 52 percent by the end of 2027. The updated RPS goals are considered achievable since many California energy providers are already meeting or exceeding the RPS goals established by SB 350.

California Air Resources Board

In 2022, CARB released the Final 2022 Scoping Plan Update, the third update to the California 2008 Climate Change Scoping Plan. While previous Scoping Plans have focused on specific GHG reduction targets, the Final 2022 Scoping Plan Update expands on these plans and lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. A key element for achieving the outcomes of the plan is to reduce demand for liquid petroleum by 94 percent and total fossil fuel demand by 86 percent in 2045 compared to 2022. To support this transformation, the plan also focuses on expanding clean energy production and distribution infrastructure, decarbonizing the electricity sector, and replacing

fossil-fuel generation with renewable and zero-carbon resources, including solar, wind, energy storage, geothermal, biomass, and hydroelectric power.

California Building Code

California Code of Regulations, Title 24, is known as the CBC, which establishes the regulations for building construction and system design and installation to achieve energy efficiency and preserve outdoor and indoor environmental quality. The CBC includes the following subparts which are most applicable to development under the proposed Project.

California Code of Regulations, Title 24, Part 6 comprises the California Energy Code, which was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to increase the baseline energy efficiency requirements. The Title 24 standards were updated in 2021 and became effective on January 1, 2023. The updated standards apply to all buildings for which an applicable building permit is submitted on or after January 1, 2023, and established new standards for electric-ready requirements, expanded solar PV and battery storage, and strengthened ventilation standards for improved air quality. The Title 24 standards also include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards are in alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 National Standards. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy-efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

California Code of Regulations, Title 24, Part 11 comprises CALGreen, which establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of volatile organic compound (VOC) emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's impact on the environment and promote a more sustainable design.

3.6.3.3 Local

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan establishes goals, policies, and objectives adopted by the County to ensure the adequate protection and provision of services and resources. The Energy Element of the Comprehensive Plan contains long-range planning guidelines and mechanisms to encourage energy efficiency and the use of alternative forms of energy in the county.

- **Energy Goal 5: Alternative Energy** – Encourage the use of alternative energy for environmental and economic benefits and encourage opportunities for businesses that develop or market alternative energy technologies.
- **Energy Policy 5.1: Environmental Analysis** – In the consideration of alternative energy, the County shall consider the full-life-cycle environmental effects and embedded energy requirements to provide such alternative energy. The County shall encourage the use of those alternatives determined to present sufficient environmental benefits.

- **Energy Policy 5.2: Alternative Energy Technologies** – The County shall encourage the use of alternative energy technology in appropriate new and existing development.
- **Energy Policy 5.13: Alternative Energy Technology Businesses** – Among broader Countywide efforts to attract businesses, the County shall initiate planning efforts to pursue desired businesses that develop or market alternative energy technologies.

County of Santa Barbara Climate Action Planning

The County's ECAP, adopted in 2015, is a GHG emission reduction plan. The County has been implementing the ECAP's emission reduction measures since 2016. The ECAP established a goal of reducing GHG emissions in the unincorporated parts of the county to 15 percent below 2007 levels by 2020 and identified 53 emissions reduction measures (ERMs) to achieve this goal. While the focus of the ECAP is on strategies and measures to reduce GHG emissions, several of the goals, strategies, and measures of the ECAP involve core strategies for reducing dependence on non-renewable energy resources and reducing emissions from certain sectors, which directly relate to the use and conservation of energy resources. For instance, the ECAP includes goals that directly or broadly apply to energy resources and conservation, including fostering increases in energy efficiency, decrease the overall use of combustion engine vehicles and the number of single-passenger vehicle trips, promote the use of alternative energy, and maximize the efficient use of local land resources through the implementation of policies and programs that promote mixed-use and infill development.

As outlined in the ECAP Final Report, the County did not meet the 2020 GHG emissions reduction goal contained within the ECAP. The County began work updating the ECAP, GHG emissions forecasts, reduction targets, and GHG emissions reduction programs and policies as part of the SB County 2030 Climate Action Plan. The County published the Draft 2030 Climate Action Plan for public review and comment in March 2023, and expects to adopt the plan in late 2023. The 2030 Climate Action Plan includes updated GHG emissions forecasts, as well as goals and policies for reducing countywide GHG emissions below adopted targets by 2030, with the ultimate goal of achieving carbon neutrality by 2045. One of the measures considered as part of this draft plan includes Measure CE-1, which if adopted would establish a goal to electrify 100 percent of new residential and new commercial construction by 2023. Further, the 2030 Climate Action Plan is designed to be a quantified plan under CEQA, which will provide the County with the ability to streamline the environmental review process of future development projects.

County of Santa Barbara Collaborative Reach Code

The County of Santa Barbara and the cities of Goleta and Carpinteria are collaborating to develop and adopt local "reach" codes to reduce carbon emissions from new construction and development. "Reach" codes are local code amendments that extend beyond state energy-efficiency requirements. They are intended to support energy efficiency, electrification, and renewable energy which can reduce GHG emissions through the electrification, or requirement for new construction to be all-electric.

County of Santa Barbara Strategic Energy Plan

The County developed the Strategic Energy Plan to: 1) stimulate local renewable energy generation within the county; 2) help meet local climate change mitigation goals; and 3) improve the resiliency of the local electric grid. The Strategic Energy Plan identifies and summarizes the renewable energy

potential in the county, as well as barriers to renewable energy development, and provides recommendations for actions to be taken by the County to overcome barriers and improve energy resiliency and sustainability. In addition, the Strategic Energy Plan identifies goals targeted toward meeting aggressive state and local emissions reduction goals (County of Santa Barbara 2019).

Zero Net Energy Ordinance

In March 2014, the County Board of Supervisors adopted the Zero Net Energy Ordinance, which requires that all new County-owned facilities and major renovations beginning design after 2025 be constructed as Zero Net Energy Facilities with an interim target for 50 percent of new facilities beginning design after 2020 to be Zero Net Energy. The Zero Net Energy Ordinance also requires that County departments take measures toward achieving Zero Net Energy for 50 percent of the square footage of existing County-owned facilities by 2025, and the remaining 50 percent by 2035.

Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

The Santa Barbara County Association of Governments' (SBCAG's) Connected 2050 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) integrates land use and transportation strategies to achieve required emission reductions per SB 375. The RTP describes how the region plans to invest in the transportation system in the next 20 years. This long-range planning document includes a SCS as required by SB 375 (SBCAG 2021).

3.6.4 Environmental Impact Analysis

This section discusses the potential impacts on energy supplies and energy conservation associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.6.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact on energy if it would:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* does not identify applicable thresholds related to energy resources; therefore, for this analysis, the Program EIR relies upon the County's Initial Study Checklist. Under the Energy section of the County's Initial Study Checklist, the County considers a project's impact on energy resources and infrastructure potentially significant if it would result in:

- Substantial increase in demand, especially during peak periods, upon existing energy sources; and/or
- Requirement for the development or expansion of new sources of energy.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential and mixed use development, are not known. As a result, the impact analysis provided below does not specifically evaluate individual impacts at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for the lower and moderate-income affordability levels. The programmatic analysis provided by this Program EIR analyzes potential future energy demand and energy-conserving features associated with potential future residential and mixed use development enabled under the Housing Element Update. This assessment estimates two potential construction development scenarios that could be enabled under the Housing Element Update to provide context for whether the future development would result in substantial increases in energy demand, require the development or extension of energy infrastructure or result in unnecessary or wasteful energy consumption. This analysis also considers whether the proposed Project would conflict with all applicable state and local energy conservation regulations and policies (e.g., compliance with California Code of Regulations, Title 24, Building Energy Efficiency Standards [Part 6] CALGreen [Part 11]).

As described in Chapter 3, *Environmental Impact Analysis,* the Housing Element Update plans for the future development of up to 34,558 new residential dwelling units and 1,534,796 square feet (sf) of commercial space. Projected energy demands for the potential future development enabled under the Housing Element Update were estimated by assuming an average persons per household (pph) of 2.89, estimated by the U.S. Census for 2020. The estimated energy demand associated with future potential residential and commercial development enabled under the Housing Element Update was then compared to the current overall energy demand of the county (unincorporated and incorporated areas included) to provide context for the projected changes in energy demand. Potential impacts resulting from the Housing Element Update were compared with the significance thresholds described above, including whether new demand would present a substantial increase in demand upon existing energy sources, especially during peak periods, or require the development or extension of energy infrastructure.

The information and analysis in this section are based on information from previous studies and EIRs prepared by the County. These include the 2021 Connected 2050: RTP/SCS EIR, the Draft 2030 Climate Action Plan EIR, as well as the County's Strategic Energy Plan, the ECAP, and the Draft 2030 Climate Action Plan. This section also utilizes data from the CEC and the California Emissions Estimator Model (CalEEMod) Version 2020.4.0, consistent with the air quality analysis in Section 3.3, *Air Quality,* and the GHG analysis in Section 3.7, *Greenhouse Gas Emissions.*

Construction Energy Use

Construction of new residential and commercial development enabled under the Housing Element Update would result in energy demand as a result of the use of heavy-duty construction equipment,

on-road trucks (e.g., haul trucks), and workers commuting to and from a specific construction site. Heavy-duty construction equipment would be primarily diesel-fueled. Energy demand (specifically transportation fuel consumption) from heavy-duty construction equipment is estimated based on the CalEEMod analysis (Appendix C) and transportation fuel consumption data from the CARB OFFROAD2011 model (Appendix C). As described in Section 3.3, *Air Quality*, the analysis models construction emissions under two separate residential project scenarios that could reasonably occur as a result of the proposed Project. Under this analysis, the project buildout assumptions developed for two potential rezone sites were modeled in CalEEMod, each of which represents the largest development sites that could result from the proposed Project within the North County and South Coast regions.

Operational Energy Use

New residential and commercial development enabled under the Housing Element Update would require long-term energy consumption from building heating, cooling, cooking, lighting, electronics, appliances, water use, wastewater treatment, and transportation-fuel consumption, primarily gasoline associated with increased vehicular traffic. Electricity and natural gas demand for new potential housing development enabled under the proposed Project were estimated using CalEEMod. A detailed discussion of the methodology employed for modeling the operation of development enabled under the Housing Element Update using CalEEMod is presented in the *Operational Air Quality Impacts* discussion of Section 3.3.4.1, *Thresholds of Significance* (Section 3.3, *Air Quality*). As described in the assumptions outlined therein, it should be noted that CalEEMod default assumptions were utilized for calculating electricity and natural gas demand generated by potential future development. These default assumptions do not reflect any additional sustainability features or development standards mandated by recent state and local regulations. Nor do the electrical and natural gas demands account for County enrollment in the 3CE program, or the County's Net Zero Energy Ordinance, which would require new County-owned facilities, including the proposed 925 units associated with potential County-owned sites, to be designed as 50 percent net zero after 2025 and 100 percent net zero after 2035. Therefore, the operational electricity and natural gas demands represent a highly conservative, worst-case estimate.

Gasoline and diesel fuel consumption for increases in development-related vehicular traffic is estimated based on the number of trips and the estimated VMT calculated by Fehr & Peers for the buildout associated with the Housing Element Update (Section 3.14, *Transportation* and Appendix F). The estimated fuel economy for vehicles is based on fuel consumption factors from the CARB Emission FACtors (EMFAC) model. EMFAC is incorporated into CalEEMod. Therefore, this energy assessment is consistent with the modeling approach used for the other quantitative environmental analysis provided in this Program EIR and is consistent with standard practice for impact analysis according to CEQA.

3.6.4.2 Project Impacts

Table 3.6-4 provides a summary of the proposed Project's impacts related to energy-related impacts. A detailed discussion of each impact follows.

Table 3.6-4. Summary of Energy Impacts

Energy Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact EN-1. The proposed Project would increase energy demand, but would not result in a substantial increase in demand, necessitate expansion or installation of new energy infrastructure, or result in wasteful, inefficient, and unnecessary consumption of energy resources during the construction or operation of individual housing developments.	Insignificant	No mitigation required	Insignificant
Impact EN-2. The proposed Project would conform to the applicable plans, policies, and regulations regarding energy conservation relative to housing development.	Insignificant	No mitigation required	Insignificant
Cumulative Impacts	Insignificant	No mitigation required	Insignificant

Impact EN-1. The proposed Project would increase energy demand, but would not result in a substantial increase in demand, necessitate expansion or installation of new energy infrastructure, or result in wasteful, inefficient, and unnecessary consumption of energy resources during the construction or operation of individual housing developments.

Construction

Construction-related energy consumption associated with future developments enabled by the proposed Project would be subject to the approval of permits before construction of new housing. Energy use during future housing construction would primarily occur in association with fuel use by vehicles and other equipment to conduct construction activities. The construction period for each housing development project enabled under the Housing Element Update would vary from a few months for additions or small developments to potentially more than several years for larger multifamily housing developments.

Electricity

The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. The electricity used for construction activities would be temporary and minimal; it would be within the supply and infrastructure service capabilities of SCE and PG&E and it would not require additional local or regional capacity. The electricity demand during construction is anticipated to be minimal as future residential projects would be built over time during the 8-year planning horizon. However, the electricity demand associated with future housing construction would not be unnecessary. The use of electricity supplies during construction would be necessary to support the development of future housing to meet the County's RHNA plus a 15 percent buffer for the lower and moderate-income

affordability levels, which has been deemed necessary by the state and SBCAG to address the local housing crisis and meeting the growing housing demands of the region.

Natural Gas

Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the *Petroleum* subsection below. Peak energy demand specifically applies to electricity; because natural gas (and petroleum) are liquid, these energy resources do not have the same constraints as electricity supply. Nonetheless, any use of natural gas is anticipated to be sufficiently served by existing supply from SoCalGas and would not require additional local or regional capacity. Any minor amounts of natural gas that may be consumed as a result of construction would be temporary and negligible and would not have an adverse effect.[3]

Petroleum

Diesel fuel would be required to power heavy construction equipment and heavy haul trucks involved in the delivery of materials to individual future project sites and exporting demolition materials or other materials offsite. The assumption that diesel fuel would be used for all equipment represents the most conservative scenario for reasonable maximum potential energy use during construction.

As described in the *Methodology* discussion under Section 3.6.4.1, *Thresholds of Significance,* modeling of construction emissions was performed using CalEEMod. Two model scenarios were prepared to estimate emissions from some of the largest potential development projects that could occur as a result of the proposed Project. The total construction fuel consumption associated with each of these model scenarios is calculated as the sum of the total estimated fuel consumption for each piece of equipment used in each phase of construction. Section 3.0, *Construction Detail* in the CalEEMod Worksheets (Appendix C), provides generalized construction phasing, construction equipment used in each phase, total number of days worked, equipment horsepower, equipment load factor, and equipment quantities based on typical construction equipment and default model assumptions. These assumptions are by nature broad-based and were used to calculate fuel consumption for specific equipment. The estimated energy consumption provided below describes the maximum energy consumption associated with development which represents the largest housing projects potentially enabled under the Housing Element Update, which correlates with the conservative worst-case (i.e., maximum) criteria pollutant and GHG emissions scenarios described in Section 3.3, *Air Quality* and Section 3.7, *Greenhouse Gas Emissions*.

Fuel consumption is based on a fuel consumption factor of 0.05 gallons per horsepower per hour (gal/hp/hr) for diesel engines as derived from the South Coast Air Quality Management District (SCAQMD) CEQA Handbook Table A9-3E.

As shown in Table 3.6-5, housing development is estimated to require up to 120,832.32 gallons of fuel for construction equipment and 1,399,976.38 gallons of fuel for construction vehicle trips (worker, vendor, hauling) over an estimated five-year construction schedule. Total fuel consumption for construction worker vehicle trips is based on average fuel consumption for light-duty vehicles assuming that 100 percent of construction workers would utilize such vehicles during construction

[3] While no natural gas is anticipated to be used during construction as construction equipment is typically diesel - fueled, the possibility of natural gas use is acknowledged in the event a natural gas-fueled piece of equipment is used or a natural gas fueled hot water boiler is used for pipe relining. However, as noted previously, all equipment was assumed to be diesel - fueled in CalEEMod.

of each new housing development. The average fuel consumption rate for construction vehicle trips is based on light-duty fuel efficiency estimates from 1980 to 2021 (Bureau of Transportation Statistics 2023). (The detailed calculations of Construction Fuel Consumption are provided in Appendix G.)

Table 3.6-5. Estimated Annual Construction Fuel Consumption

Diesel Fuel Consumption from Construction Equipment (Gallons)	Gasoline Fuel Consumption from Construction Vehicle Trips (Gallons)	Total Construction Diesel and Gasoline Fuel Consumption (Gallons)
Scenario 1: Potential Rezone Site No. 1 (Giorgi) (South Coast)		
110,359.80	1,399,976.38	1,510,336.18
Scenario 2: Potential Rezone Site No. 19 (Key Site 1) (Santa Maria Valley)		
120,832.32	1,227,623.36	1,348,455.68
Scenario 1 + Scenario 2 Combined Fuel Consumptions		
231,192.12	2,627,599.74	2,8758,791.68

Source: Appendix G.

For comparison purposes, the energy demand from diesel and gasoline fuel consumption associated with the Housing Element Update has been compared to the Santa Barbara County annual transportation fuel sales. Annual average diesel and gasoline fuel consumption during construction of an individual housing development project is calculated as combined fuel consumption for construction model Scenario 1 and Scenario 2, conservatively assuming both scenarios are developed concurrently on the same construction schedule, divided by the number of years of construction (assumed to be five years). As shown in Table 3.6-6, the Housing Element Update would represent a very small fraction – approximately 0.12 percent and 0.31 percent – of the county's annual diesel and gasoline fuel consumption, respectively.

Table 3.6-6. Comparison of Housing Element Construction and County Diesel Fuel Usage

	Diesel Fuel Consumption (millions of gallons)	Gasoline Fuel Consumption (millions of gallons)
Santa Barbara County (2022)	22,000,000	170,000,000
Combined Average Annual Construction Fuel Consumption	26,238.42	525,519.95

Sources: CEC 2023d; Appendix G.

Compliance with federal, state, and County policies – including California Idling Regulations as defined by CARB, which prohibits heavy-duty diesel vehicles with a Gross Vehicle Weight Rating of 10,000 pounds or more from idling for longer than five minutes (Section 3.3, *Air Quality*) – and the temporary nature of construction would result in more efficient use of construction-related energy resources and minimize or eliminate wasteful and unnecessary consumption of energy. In addition, it should be noted that the state has determined that the construction of housing under each city's or county's RHNA is essential and necessary to protect the general health and welfare of the residents of the county. Therefore, the construction of residential and commercial development enabled under the Housing Element Update would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Construction energy impacts would be *insignificant*.

Operation

Electricity and Natural Gas

Housing development enabled under the Housing Element Update would permanently increase the demand for electricity and natural gas primarily for building heating and cooling. It is estimated that the Housing Element Update would generate a net new annual electricity demand of 155,023,877 kWh (155 GWh) per year and a net new annual natural gas demand of 3,632,562 therms per year. These estimates correspond with an approximately 5.5 percent and 2.8 percent increase in electricity and natural gas consumption within the county, respectively (Table 3.6-7).

Table 3.6-7. Project Increase in Electricity and Natural Gas Demand

Electricity Demand (GWh)			Natural Gas Demand (millions of therms)		
County	**Project**	**% Increase**	**County**	**Project**	**% Increase**
2,804.1	155	5.5	129.2	3.6	2.8

Sources: CEC 2023c; CEC 2023e; Appendix C.

While the analysis conservatively assumes future housing development would be designed as mixed-fuel, it is likely future development enabled under the proposed Project would be designed as 100 percent electric consistent with Measure CE-1 of the County's Draft 2030 Climate Action Plan, the adoption of which would establish a goal to electrify 100 percent of new residential and new commercial construction by 2023. Further, as described in Section 3.6.3, *Regulatory Setting,* future residential and commercial development would be subject to compliance with the California Energy Code, which establishes standards and requires the implementation of various sustainable design features, including requirements for future residential and commercial development to be built solar ready, the installation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems, operable windows to increase airflow, high-performance building envelope to maximize insulation, lighting systems with occupancy sensors and dimmers, and energy-efficient building materials and appliances.

As previously discussed in Section 3.6.2.1, *Electricity*, since 2022 all residential and commercial users in the county receive electricity from 3CE, a community choice energy agency that buys electricity from renewable sources and partners with PG&E and SCE to distribute electricity to residential and commercial customers throughout the county. The default energy product of 3CE increases customers' use of renewable energy to 31 percent and is an important step to the County achieving 100 percent renewable energy by 2030. However, the County and 3CE do not prohibit individuals or businesses from opting out of the program and remaining with PG&E's or SCE's renewable generation percentage (Section 3.6.2.1, *Electricity*).

The combination of energy-saving and energy-generating features that would be incorporated into the development of future residential and commercial uses, including those resulting from compliance with the California Energy Code and CALGreen, would ensure that buildout under the proposed Project would not use energy in a wasteful or inefficient manner. In addition, while the maximum buildout under the proposed Project could accommodate up to 99,873 new residents, it is anticipated that a substantial number of these residents accommodated by developed facilitated under the Housing Element Update would consist of individuals and families already residing in Santa Barbara County, and thereby would not create new substantial energy demands in the region. Further, it should be noted that the state has determined that the development of new residential units under the Housing Element Update is essential and necessary to protect the general health and welfare of

the residents of the county. Therefore, the operation of residential and commercial development enabled under the Housing Element Update would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure.

Further, based on the sites inventory prepared for the Housing Element Update, the proposed Project would not enable development in areas not serviced by PG&E, SCE, or SoCalGas. Housing sites are largely located within existing developed, urban areas of the unincorporated county connected to existing services and infrastructure. Development of potential housing sites may trigger the need for the construction of new service connections (e.g., conduits and gas lines) to serve the site. However, applicants for new housing development would be required to obtain letters from all associated utility providers for the area and provide copies of these letters to the County before issuance of permits to construct. As such, implementation of the proposed Project is not anticipated to require the development or expansion of new sources of energy supplies, and operational electricity and natural gas impacts would be *insignificant*.

Vehicle Fuel Consumption

In addition to electricity and natural gas resources, new housing development enabled by the Housing Element Update would result in increases in daily consumption of vehicle fuel for mobile trips as a result of increases in daily VMT. As described in Section 3.14, *Transportation,* the future occupation of 34,558 new residential units and operation of 1,549,796 sf of commercial development is estimated to produce a total of 2,606,326 daily VMT, with an average of 37.9 VMT per capita countywide. As summarized in Table 3.6-8, using the estimated fleet mix data provided in Appendix C, based on the anticipated increases in daily VMT and average vehicle fuel efficiency, buildout under the proposed Project has the potential to increase daily fuel consumption and associated fuel demands by 138,682.6 gallons, or 50,509,649.0 gallons annually. This estimate corresponds with an approximate 34.4 percent increase in annual gasoline consumption within the county.

Table 3.6-8. Estimated Annual Fuel Demand of the Proposed Project

Vehicle Type	Percent of Vehicle Trips[1]	Daily VMT	Average Fuel Economy (miles/gallon)[2]	Total Daily Fuel Consumption (gallons)
Passenger Cars	51.7	1,347,471	23.3	57,831.4
Light/Medium Duty Vehicles	40.2	1,047,743	17.1	61,271.5
Heavy Duty Vehicles/Other	5.4	140.742	7.3	19,279.78
Motorcycles	2.7	70,371	43.4	1,61.45
Total Daily	**100.0**	**2,606,326**	**--**	**138,382.6**
Annual[2]	**--**	**951,309,043**	**--**	**50,509,649.0**

Notes:

[1] Percentage of Vehicle Trips and Fleet Mix information provided in Table 4.4, Fleet Mix of Appendix C.
- Passenger Cars are the sum of the light-duty-auto fleet mix trip percentage column.
- Light/Medium Duty Vehicles is the sum of the LDT1, LDT2, and MDV fleet mix trip percentage columns. LDT = light-duty truck; MDV = medium-duty vehicle
- Heavy Duty Vehicles/Other is the sum of the LHD1, LHD2, MHD, HHD, and bus fleet mix trip percentage columns. LHD = light-heavy-duty; MHD = medium-heavy-duty; HHD = heavy-heavy-duty

Motorcycles are the sum of the MCY fleet mix trip percentage column. MCY = motorcycle

[2] Annual VMT and fuel consumption calculated as daily VMT and daily fuel consumption, multiplied by 365 days.

Sources: Bureau of Transportation Statistics 2023; SBCAG 2021; CEC 2023d; Appendix C; Appendix G.

The additional demand for transportation fuel supplies resulting from the proposed Project would be met by existing gasoline stations located throughout the county. Further, it is likely that over time, future residents of development under the Housing Element Update would be replaced with newer vehicles that would be subject to the increasingly more stringent state fuel standards. Throughout the 8-year planning horizon of the proposed Project, vehicle efficiency would likely improve and transportation fuel demand would experience a gradual decline thereby minimizing the inefficient consumption of transportation fuels. Furthermore, as additionally described in Section 3.14, *Transportation*, although the increase in countywide VMT associated with the proposed Project would result in the consumption of transportation fuels, the Housing Element Update would result in an overall decrease in countywide VMT per capita when compared to existing county baseline VMT per capita. This is largely due to the concentration of future housing development within more VMT-efficient regions of the county, such as the South Coast, and locating a majority of housing on urban infill sites in proximity to existing services and opportunities for alternative modes of transportation and creating opportunities for many employees within the county to live closer to their jobs, reducing VMT and associated energy consumption on a regional basis. Though not assumed as part of the calculation of Project increases in transportation fuel demands, it is also likely that fuel demand would be lower than estimated in this analysis, due to a variety of other factors relating to the types of vehicles utilized by future residents. For instance, in the South Coast, a large portion of proposed rezone properties are located along the Hollister Avenue corridor, which is the only designated High Quality Transit Corridor (HQTC) of the county. The proximity of housing development to this HQTC would result in potential increases in the proportion of trips made using existing transit services, reducing daily trips and VMT. Lastly, though not required to reduce impacts, as described in Section 3.14, *Transportation,* the proposed Project would be required to implement **MM T-1 (Site-based TDM)** which would ensure objective site-specific transportation demand management and multi-modal infrastructure to support the transportation needs of the residential or mixed use projects fostered by the Housing Element Update. Implementation of this measure would directly reduce VMT, as well as transportation fuel demands.

Therefore, implementation of the Housing Element Update is not anticipated to constrain local or regional energy supplies and would not require the expansion or construction of new generation and/or transmission facilities. As such, implementation of the Housing Element Update would not use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner and impacts would be *insignificant*.

Impact EN-2. The proposed Project would conform to the applicable plans, policies, and regulations regarding energy conservation relative to housing development.

The Housing Element Update would not be inconsistent with federal, state, or local energy conservation goals and policies. As previously described, the Housing Element Update serves as the guiding document for how the County will address its housing needs and help alleviate the local housing crisis. The Housing Element Update itself does not propose or include approval of site-specific development. However, the proposed Project would facilitate future residential and mixed use development. All development enabled under the proposed Project would be subject to compliance with existing state and County regulations, such as building code requirements established in Title 24 of the California Code of Regulations. Part 6 of Title 24 and all applicable rules and regulations outlined in Section 3.6.3, *Regulatory Setting* would reduce energy demand and increase energy efficiency related to future housing development facilitated by the proposed Project. Most notably, the California Energy Code (Part 6) and CALGreen (Part 11) establish mandatory energy efficiency

standards and green building code requirements for residential and non-residential buildings to reduce energy demand and consumption and increase energy resiliency and efficiency.

Additionally, the proposed Project is generally consistent with the goals and policies outlined in the County's Energy Element, 2015 ECAP, and Strategic Energy Plan, as well as SBCAG's RTP/SCS, CARB's Scoping Report, and the County's Draft 2030 Climate Action Plan. Many of the goals and policies of these plans identify regional measures or strategies for reducing energy consumption and improving energy efficiency by encouraging County actions and adoption of plans that would improve energy resiliency and encouraging development within urban areas near existing services as a means to reducing vehicle trips, transportation fuel demand, and mobile-source GHG emissions.

For instance, as discussed further in Section 3.10, *Land Use and Planning,* the proposed Project involves the adoption of amendments to the County's Comprehensive Plan with various goals, policies, and programs that enable the production of housing at targeted affordability levels to meet the RHNA and further provision of fair housing to address the local housing crisis and incentivize and prioritize housing production in a manner that affirmatively furthers fair housing. Several of the goals and objectives of the Housing Element Update are also oriented towards promoting livable communities, increasing housing for people who live and/or work in Santa Barbara County, promoting housing development on infill sites with access to jobs and services, and promoting the jobs-to-housing balance by facilitating housing development near job centers and essential community services (Section 2.3.1, *Goals and Objectives*). Development of future housing consistent with these goals would have the effect of reducing commuter trips in and out of the county and increasing the use of active transportation (i.e., walking, bicycling, transit) by locating housing in proximity to jobs and services and promoting the jobs-to-housing balance.

In addition, as discussed in Impact EN-1 above, since 2021, all residential and commercial users in the county receive electricity from 3CE, a community choice energy agency that buys electricity from renewable sources and partners with PG&E and SCE to distribute electricity to residential and commercial customers throughout the county. The default energy product of 3CE increases customers' use of renewable energy to 31 percent and is an important step to the County achieving 100 percent renewable energy by 2030. Though the County and 3CE do not prohibit individuals or businesses from opting out of the program and remaining with PG&E's or SCE's renewable generation percentage, future development under the Housing Element Update would likely be enrolled in this program.

Further, approval of the proposed Project, as a policy document update, would not change these existing regulations applicable to all future development enabled under the proposed Project and would not provide goals, policies, or programs that would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be *insignificant.*

3.6.4.3 Cumulative Impacts

Electricity and Natural Gas

Potential future development within the county and the state would incrementally contribute to the need for regional energy production and distribution facilities. As previously discussed, these facilities are operated and maintained by private utility companies that plan for and accommodate anticipated growth. Electric and natural gas services are provided upon demand from consumers and expanded as needed to meet demand, consistent with applicable local, state, and federal regulations.

Concerning electricity, all new development in the county must comply with adopted building standards, including the California Energy Code, which requires new development to be built more sustainably to reduce electricity demands. Additionally, as previously described, the county receives electricity from the 3CE and therefore, the Housing Element Update and cumulative development would consume electricity that would be generated by a large percentage of renewable energy sources (e.g., solar, solid waste conversion, etc.). Cumulative development projects also include the County's Utility-Scale Solar Ordinance Project, which once adopted would increase the County's ability to produce locally sourced renewable energy supplies, and the 2030 Draft Climate Action Plan. The plan includes various implementation actions and measures aimed at improving energy efficiency throughout the county, including actions such as the adoption of an ordinance that would increase electric vehicle readiness requirements above Title 24 requirements, achieving 100 percent renewable electricity for all residential and commercial development by 2030 through 3CE, and adoption of an Energy Assurance Plan. These cumulative development actions and measures are aimed at improving compliance with and exceeding the standards of adopted state and local plans for renewable energy and energy efficiency. As such, with mandatory compliance with existing regulations and energy efficiency standards, as well as through the adoption of additional actions and measures aimed at increasing energy conservation and resilience, cumulative development, in addition to the proposed Project, would not result in the inefficient use or waste of electrical supplies or result in conflicts with existing plans. Therefore, associated cumulative impacts would be *insignificant.*

Concerning natural gas consumption, California's natural gas demand is expected to decrease at a rate of 1.0 percent per year from 2018 to 2035 as a result of stricter codes/standards, energy efficiency improvements, and the state's transition away from fossil fuel-generated electricity to increased renewable energy. While cumulative projects would result in the use of nonrenewable natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for Santa Barbara County. As described for the proposed Project, new residential and commercial development throughout the would be subject to existing standards, including the California Energy Code, which mandates that new development be built electric-ready which would reduce the potential for increased consumption of natural gas. Further, as with the housing development under the proposed Project, cumulative development within Santa Barbara County would be subject to mandatory compliance with existing policies and regulations, including building standards governing the use and efficiency of energy supplies.

Given that all recent past, present, and reasonably foreseeable cumulative development would be required to meet at minimum state and local energy requirements, and given cumulative development occurring throughout the county includes plans, programs, and initiatives that would improve local energy efficiency and sustainability, the Housing Element Update would not result in a substantial contribution to cumulatively considerable impacts, and cumulative impacts would be *insignificant.*

Transportation Energy

Residential and mixed use development enabled by the Housing Element Update along with future growth within the county would cumulatively increase the demand for transportation-related fuel in the state and region. However, over the last decade, the state has implemented several policies, rules, and regulations to improve vehicle fuel economy, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce VMT which would reduce reliance on petroleum fuels. According to the CEC, gasoline consumption has declined

by 6 percent since 2008, and the CEC predicts that the gasoline demand will continue to decline over the next 10 years and that there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. In 2020, Governor Gavin Newsome also signed EO N-79-20, which calls for ZEVs by 2035. Further, as discussed previously, the Housing Element Update, as well as the cumulatively considered housing element updates of the eight incorporated cities, would support regional and local goals and policies to increase housing opportunities in jobs-rich and transit-served areas. By providing housing in jobs-rich areas of the county, the proposed Project and cumulatively considered housing element update projects are likely to create opportunities for many employees within the county to live closer to their jobs, reducing VMT and associated energy consumption on a regional basis. Therefore, the Housing Element Update would not result in a substantial contribution to cumulatively considerable impacts associated with transportation energy supplies, and impacts would be *insignificant.*

3.6.4.4 Proposed Mitigation

No mitigation measures are required.

3.6.4.5 Secondary Impacts

No mitigation measures are required to reduce impacts associated with the proposed Project. Therefore, no direct secondary impacts would occur.

3.6.4.6 Residual Impacts

Impact EN-1. Implementation of the proposed Project would not result in substantial increases in energy demands, result in the need for the development or expansion of energy infrastructure, or result in the wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation, nor would implementation of the proposed Project require the development or expansion of new energy sources. Residual impacts would be *insignificant.*

Impact EN-2. Implementation of the proposed Project would not conflict with applicable, plans, policies, and regulations regarding energy use and conservation. Future development enabled under the proposed Project would be subject to compliance with existing state and local regulations and mandates applicable to energy efficiency and conservation. Residual impacts would be *insignificant.*

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Section 3.7
Greenhouse Gas Emissions

3.7.1 Introduction

This section describes the potential impacts related to greenhouse gas (GHG) emissions and climate change that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County).

Issues relating to the generation of criteria air pollutant emissions from construction and operation of future development are discussed in Section 3.3, *Air Quality.*

3.7.2 Environmental Setting

As described in Section 3.3, *Air Quality, the* California Air Resources Board (CARB) has divided California into 15 regional air basins that correspond to topographic features that influence regional air quality conditions. Each basin is further divided into Air Pollution Control Districts (APCDs), which are responsible for managing and enforcing air quality regulations within their districts.

The Project area includes the unincorporated area of Santa Barbara County, which is located in the South Central Coast Air Basin (SCCAB). SCCAB comprises three air districts: San Luis Obispo County APCD, Santa Barbara County Air Pollution Control District (SBCAPCD), and Ventura County APCD. The Project area, which includes the five Housing Market Areas (HMAs; Lompoc Valley, Santa Maria Valley, Santa Ynez Valley, Cuyama Valley, and South Coast), is within the jurisdiction of SBCAPCD.

Land uses in unincorporated areas of Santa Barbara County are mostly agricultural, open space, residential communities, and some commercial industrial areas and job centers. Passenger vehicles, motorcycles, and trucks are the primary sources of GHG emissions in the county. Additional sources of GHG emissions include the use of natural gas in buildings and facilities, agricultural practices, electricity use (generated in-state and imported), the operation of off-road equipment, solid waste, and water/wastewater.

3.7.2.1 Background

The natural process through which heat is retained in the Earth's troposphere is called the "greenhouse effect." The greenhouse effect traps heat in the troposphere through a three-fold process, summarized as follows: short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave (i.e., thermal) radiation; and GHGs in the upper atmosphere absorb this long-wave radiation and emit this long-wave radiation into space and toward the Earth. This "trapping" of the long-wave radiation emitted back toward the Earth is the underlying process of the greenhouse effect. The greenhouse effect provides a habitable climate on the planet, although large magnitudes of GHG emissions from anthropogenic sources since the Industrial Revolution have created an excess of these gases in the atmosphere.

GHGs are the result of both natural and human-influenced activities. Volcanic activity, forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation,

transportation, heating, and cooling are the primary sources of GHG emissions. Without human activity, the Earth would maintain an approximate, but varied, balance between the emission of GHGs into the atmosphere and the storage of GHGs in oceans and terrestrial ecosystems. Increased combustion of fossil fuels (e.g., gasoline, diesel, and coal) has contributed to a rapid increase in atmospheric levels of GHGs over the last 150 years.

GHG pollutants most prevalently generated by human activities that have the greatest quantifiable influence on climate include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). In addition to CO_2, CH_4, and N_2O, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), black carbon (black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. Methodologies and regulations approved by the Intergovernmental Panel on Climate Change (IPCC), the United States Environmental Protection Agency (USEPA), and CARB focus on CO_2, CH_4, N_2O, and chlorofluorocarbons (CFCs). CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher Global Warming Potential (GWP) than CO_2. CFCs have been banned in the U.S. and have no natural source, so these GHGs are not included in this analysis.

- **CO_2.** The production and absorption of CO_2 from human activities occurs through the burning of fossil fuels (e.g., oil, natural gas, and coal), solid waste, and wood products, and as a result of other chemical reactions, such as those required to manufacture cement. CO_2 is constantly being exchanged among the atmosphere, ocean, and land surface as it is both produced and absorbed by many microorganisms, plants, and animals. However, emissions and removal of CO_2 by these natural processes tend to balance. Since the Industrial Revolution began around 1750, human-related activities have increased CO_2 concentrations in the atmosphere by approximately 48 percent, primarily resulting from fossil fuel combustion and cement production (USEPA 2023d; World Meteorological Organization 2022). Globally, the largest source of human-related CO_2 emissions is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. CO_2 is sequestered (i.e., removed from the atmosphere) when it is absorbed by plants as part of the biological carbon cycle. When in balance, total CO_2 emissions and removals from the entire carbon cycle are roughly equal.
- **CH_4.** CH_4 is emitted from a variety of both human-related and natural sources. Anthropogenic sources of CH_4 include the production and transport of coal, natural gas, and oil, from livestock and other agricultural practices, and from the decay of organic waste in municipal solid waste landfills. It is estimated that up to 65 percent of global CH_4 emissions are related to human activities. Natural sources of CH_4 include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and wildfires (USEPA 2020).
- **N_2O.** Microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen, produce N_2O. In addition to agricultural sources, some industrial processes (e.g., fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to the atmospheric load of N_2O. Concentrations of N_2O began to rise at the beginning of the Industrial Revolution, reaching 314 parts per billion (ppb) by 1998. (USEPA 2020).

To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO_2, denoted as carbon dioxide equivalent (CO_2e). CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the GWP of a GHG, is

dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Table 3.7-1 shows the GWP for some of the most environmentally prevalent GHGs.

Table 3.7-1. Global Warming Potential for Various GHGs

Pollutant	Lifetime (Years)	Global Warming Potential (Second Assessment)	Global Warming Potential (Fourth Assessment)
Carbon Dioxide (CO_2)	--	1	1
Methane (CH_4)	12	21	25
Nitrous Oxide (N_2O)	114	310	298
Nitrogen Trifluoride	740	Unknown	17,200
Sulfur Hexafluoride (SF_6)	3,200	23,900	22,800
Perfluorocarbons (PFCs)	2,600-50,000	6,500-9,200	7,390-12,200
Hydrofluorocarbons (HFCs)	1-270	140-11,700	124-14,800

Source: CARB 2022.

3.7.2.2 Potential Effects of Climate Change

The primary effect of rising global concentrations of atmospheric GHG levels is a rise in the average global temperature of approximately 0.17 degrees Celsius (°C) per decade since 1901, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling using 2000 emission rates shows that further warming is likely to occur given the expected rise in global atmospheric GHG concentrations from innumerable sources of GHG emissions worldwide (including from economically developed and developing countries and deforestation), which would induce further changes in the global climate system during the current century (USEPA 2023b). Scientists expect that the average global surface temperature could rise by 2-11.5 degrees Fahrenheit (°F) by 2100, with significant regional variation.

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain some uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. As the study of climate change and climate science progresses, the science itself and our understanding of the effects of climate change become more accurate. Yet, due to the complexity of the Earth's climate system and the inability to precisely model it, the uncertainty surrounding climate change remains. Nevertheless, the IPCC stated that "observed increases in well-mixed GHG concentrations since around 1750 are unequivocally caused by human activities…[and] human influence has warmed the climate at a rate that is unprecedented in at least the last 2,000 years." (IPCC 2021). Thousands of studies conducted by tens of thousands of scientists around the world have documented changes in the climate, with many lines of evidence demonstrating that human activities, especially GHGs, are the primary cause (U.S. Global Change Research Program 2017).

According to California's Fourth Climate Change Assessment (California Natural Resources Agency [CNRA] 2018), adverse effects from global climate change in California could:

- By 2050, increase intensity and frequency of heat waves, causing two to three times more heat-related deaths in cities.
- By 2100, increase average annual maximum daily temperature by 5.6°F to 8.8°F.
- By 2100, cause declines in the average water supply from snowpack by two-thirds from historic levels.
- By 2100, increase the frequency of extreme wildfires and increase the average area burned statewide by 77 percent.
- By 2100, completely erode 31 to 67 percent of Southern California beaches, increasing the risk of tidal inundation and coastal flood hazards.

Below is a summary of some of the potential effects that could be experienced in California and particularly within the Central Coast region as a result of global warming and climate change. Other types of environmental impacts related to air pollutant emissions are addressed in Section 3.3, *Air Quality*.

Air Quality and Heat-Related Public Health Impacts

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone (O_3), but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (Langridge, R. [University of California, Santa Cruz] 2018). However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

In 2021, the CNRA published the most recent iteration of the California Climate Adaptation Strategy, which was first prepared as a response to the Governor's Executive Order (EO) S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. The California Energy Commission's Cal-Adapt website, an outcome of California's first Climate Adaptation Strategy, provides climate change scenarios and impacts beneficial to local decision-makers. The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea level rise, and snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the county could experience an average increase in temperature of approximately 4.3°F to 74.3°F by 2070–2099, compared to the baseline 1961–1990 period (70.0°F), which is a potential increase of approximately 6 percent. Data suggest that the predicted future increase in temperatures as a result of climate change could potentially interfere with efforts to control and reduce ground-level ozone in the region (CEC 2023).

Water Supply and Water Quality

Uncertainty remains concerning the overall impact of global climate change on future water supplies in California. Studies have found that "[c]onsiderable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and

consistent information about how precipitation patterns, timing, and intensity will change." For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation. Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, a reduced snowpack coupled with increased rainfall during winters could lead to reductions in spring season runoff and higher evapotranspiration because higher temperatures could reduce the amount of water available for recharge.

These effects of climate change may also have adverse effects on water quality. Changes in precipitation and runoff entering waterbodies and more frequent flooding can exacerbate many forms of water pollution, including increases in erosion and discharge of sediments or increasing runoff carrying harmful pollutants. Increases in water temperatures may also cause eutrophication and excess algal growth, as well as make it more difficult to attain water quality standards. These effects would impact natural processes, as well as the quality of much of California's water supplies (USEPA 2016).

Hydrology and Sea Level Rise

Climate change could potentially affect the amount of snowfall, rainfall, and snowpack, and the intensity and frequency of storms. As a result, climate change could lead to adverse flood hydrographs (e.g., flash floods, rain or snow events, and coincidental high tide and high runoff events), sea level rise and coastal flooding, coastal erosion, and the potential for saltwater intrusion. Sea level rise can be a product of global warming through two main processes, including the expansion of seawater as the oceans warm and the melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood control facilities, including levees and coastal armoring, to handle storm events. Along the county's coastline, sea levels are projected to rise by 8.4 inches by 2030, 30 inches by 2060, and 79.2 inches by 2100, increasing coastal flooding and dune and bluff erosion, which threatens many coastal communities and infrastructure. The projected rate of sea level rise, when coupled with coastal flooding from a 100-year storm event, could increase high tide levels by up to 48.4 inches by 2030, 70 inches by 2060, and 119.2 inches by 2100 and causing an average of 623 feet of dune erosion and 177 feet of bluff erosion (County of Santa Barbara 2021).

Agriculture

California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. As described in Section 3.2, *Agricultural Resources*, there is a $2.8 billion agricultural industry in Santa Barbara County. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase, crop yield could be threatened by a less reliable water supply, and greater O_3 pollution could render crops more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Changes in the climate can affect terrestrial, coastal, and

marine ecosystems by altering the hydrologic cycle and water quality, reducing the range of habitats, altering animal behavior and migration patterns, and altering the timing of natural processes such as flower blooms (USEPA 2023a). Rising temperatures could have four major impacts on plants and animals: 1) timing of ecological events; 2) geographic range; 3) species' composition within communities; and 4) ecosystem processes such as carbon cycling and storage. Recent studies have found that in California, 16 of 29 vegetation communities are highly or nearly highly vulnerable to climate change (CNRA 2018b). The most vulnerable ecosystems in the county are the aquatic systems (e.g., streams, creeks, rivers, and lakes), particularly sloughs and coastal marshes in the North County and South Coast (County of Santa Barbara 2021).

3.7.2.3 Existing GHG Emissions from Human Activity

The burning of fossil fuels, such as coal and oil, especially for the generation of electricity and powering of motor vehicles, has led to substantial increases in CO_2 emissions (and thus substantial increases in atmospheric concentrations). In 2022, atmospheric CO_2 concentrations measured 421 parts per million (ppm) at the National Oceanic and Atmospheric Administration's (NOAA's) Mauna Loa Atmospheric Baseline Observatory in Hawaii, representing an increase from the level of 280 ppm that occurred for 6,000 years of human civilization before the Industrial Revolution (NOAA 2023).

Global GHG Emissions

The IPCC was formed by the World Meteorological Organization in 1988 to provide governments at all levels with scientific information that they can use to develop climate policies. The IPCC is the United Nation's body for assessing the science related to climate change and is responsible for tracking and reporting global emissions of GHGs. IPCC's Sixth Assessment Report, which was published in 2022, reported that global net anthropogenic GHG emissions were 59 ± 6.6 gigatons (Gt) CO_2e in 2019, approximately 12 percent (6.5 Gt CO_2e) higher than in 2010 and approximately 54 percent (21 Gt CO_2e) higher than in 1990. The annual average during the decade 2010-2019 was 56 ± 6.0 Gt CO_2e, 9.1 Gt CO_2e per year higher than in 2000–2009. This is the highest increase in average decadal emissions on record. The average annual rate of growth slowed from 2.1 percent per year between 2000 and 2009 to 1.3 percent per year between 2010 and 2019. Almost half (i.e., approximately 42 percent) of cumulative anthropogenic CO_2 emissions between 1850 and 2019 have occurred in the last 30 years (IPCC 2021).

U.S. GHG Emissions

In 2020, the total gross U.S. GHG emissions were 6,340.2 million metric tons (MMT) of CO_2e. Total U.S. emissions have decreased by 2.3 percent from 1990 to 2021, down from a high of 15.8 percent above 1990 levels in 2007. Emissions decreased from 2020 to 2021 by 5.2 percent (314.3 MMT CO_2e). From 2019 to 2020, there was a sharp decline in emissions, which is largely due to the impacts of the COVID-19 Pandemic on travel and economic activity. However, the decline also reflects the combined impacts of long-term trends in many factors, including population, economic growth, energy markets, technological changes, energy efficiency, and the carbon intensity of energy fuel choices. Following this decrease, travel and economic activity began to increase again, and in 2021, CO_2 emissions from fossil fuel combustion increased by 6.8 percent from the previous year. Emissions from the energy and transportation sectors, associated with increases in consumption of natural gas, coal, and petroleum also increased. In 2021 overall, CO_2 emissions from fossil fuel combustion were 1.9 percent below 1990 levels (USEPA 2023). In 2021, the total U.S. GHG emissions by sector were 28.5 percent

for the transportation sector, 25.0 percent for the electric power sector, 23.5 percent for industry, 10.0 percent for agriculture, 6.9 percent for the commercial sector, and 5.7 percent for the residential sector (USEPA 2023).

State of California GHG Emissions

In 2020, California generated approximately 369.2 MMT CO_2e, or approximately 5 percent of total U.S. emissions. This is due primarily to the size and population of California as compared to other states. Despite a population increase of 14.2 percent between 2000 and 2020, the gross per capita emissions in the state were reduced by 24 percent from 13.8 metric tons (MT) CO_2e per person in 2001 to 9.3 MT CO_2e per person in 2020, a 33 percent decrease (CARB 2022). This reduction indicates the contributions that energy conservation and energy efficiency have in reducing per capita emissions. Another factor that has reduced California's fuel use and GHG emissions is its mild climate compared to that of many other states.

Transportation is the source of approximately 36.8 percent of the state's GHG emissions, followed by industrial sources at 19.9 percent, and electricity generation – both in-state and out-of-state – at 16.1 percent. Residential and commercial sources account for 10.5 percent, combined, while agriculture accounts for 8.6 percent. High GWP, such as refrigerants, comprised 5.8 percent of California's GHG emissions in 2018. Waste accounted for approximately 2.4 percent of state emissions (CARB 2022a).

County of Santa Barbara Emissions Inventory

As part of the County's 2030 Draft Climate Action Plan, the County prepared a comprehensive GHG inventory using 2018 data. Based on this data, in 2018, the County produced 1,426,540 MT CO_2e. Compared to the County's prior 2007 GHG emissions inventory, GHG emissions increased by approximately 19.5 percent. However, the relative contribution values of each emission source remain proportionately unchanged from 2007 to 2018. Transportation (on-road and off-road) and building energy use are the primary sources of GHG emissions in the county (County of Santa Barbara 2023).

3.7.3 Regulatory Setting

Federal, state, and local regulations have been enacted to address GHGs and climate change in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.7.3.1 Federal

Federal Clean Air Act

The Federal Clean Air Act (Federal CAA) was passed in 1963, and amended in 1990, and was the first comprehensive federal law to regulate air emissions from stationary and mobile sources. Among other things, the law authorizes the USEPA to establish National Ambient Air Quality Standards (NAAQS), which help to ensure basic health and environmental protection from air pollution. The Federal CAA also gives the USEPA the authority to limit emissions of air pollutants coming from sources like chemical plants, utilities, and steel mills.

In April 2007, the U.S. Supreme Court ruled that GHGs are "air pollutants" under the Federal CAA. On December 7, 2009, two distinct findings regarding GHGs were signed under Section 202(a) of the Federal CAA. These include the "Endangerment Finding" and the "Cause or Contribution Finding." The Endangerment Finding finds that the current and projected concentrations of the six key well-mixed GHGs in the atmosphere threaten the public health and welfare of current and future generations. The Cause and Contribution Finding finds that the combined emissions of these well-mixed GHGs from new motor vehicles and vehicle engines contribute to the GHG pollution that threatens public health and welfare.

In 1990, the U.S. Congress adopted the Federal CAA Amendments (CAAA), which updated the nation's air pollution control program. The Federal CAAA established several requirements, including new deadlines for achieving federal clean air standards.

The USEPA is the federal agency charged with administering the Federal CAAA and other air quality-related legislation. As a regulatory agency, USEPA's principal functions include setting NAAQS; establishing minimum national emission limits for major sources of pollution; and promulgating regulations.

The Federal CAAA requires USEPA to approve state implementation plans (SIPs) to meet and/or maintain the NAAQS. California's SIP is comprised of plans developed at the regional or local level.

Energy Independence and Security Act

The Energy Independence and Security Act (EISA) of 2007 includes several key provisions that will increase energy efficiency and the availability of renewable energy, which will reduce GHG emissions as a result. The EISA facilitates the reduction of GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- Achieving approximately 25 percent greater efficiency for light bulbs by phasing out old incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.
- While superseded by the 2019 USEPA and National Highway Traffic Safety Administration (NHTSA) actions described in Section 3.3, *Air Quality*, the EISA included: a) establishing a minimum average fuel economy of 35 mpg for the combined fleet of cars and light trucks by 2020; and b) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

Vehicle Emissions Standards

In 2009, a national policy was adopted for fuel efficiency and emissions standards in the U.S. auto industry, which applies to passenger cars and light-duty trucks for model years 2012 to 2016 (referred to as the Pavley standards; Phase 1 standards). The standards surpass the prior Corporate Average Fuel Economy standards and require an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016, based on USEPA calculation methods. These standards were formally adopted on April 1, 2010.

In 2012, new standards were adopted for model year 2017 to 2025 for passenger cars and light-duty trucks. By 2020, new vehicles are projected to achieve 41.7 mpg – if GHG reductions are achieved exclusively through fuel economy improvements – and 213 grams of CO2 per mile (Phase 2 standards). By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO2 per mile. According to the USEPA, a model year 2025 vehicle would emit approximately one-half of the GHG emissions from a model year 2010 vehicle.

On October 25, 2016, the USEPA established rules for a comprehensive Phase 2 Heavy-Duty National Program that established fuel consumption and CO_2 standards for each of the four regulatory categories of heavy-duty vehicles. The rule also included separate standards for the engines that power combustion tractors and vocational vehicles. These standards build upon the Phase 1 and Phase 2 standards for light-duty vehicles spanning model years 2012-2025.

On April 12, 2023, the USEPA announced new, more ambitious proposed standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027and through 2032 (USEPA 2023c).

3.7.3.2 State

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. CARB ensures the implementation of the California Clean Air Act (CCAA) and responds to the Federal CAA. CARB is responsible for the control of vehicle emission sources, while the local APCD is responsible for enforcing standards and regulating stationary sources. CARB conducts research, sets California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. CARB is responsible for the control of vehicle emission sources, while the local APCD is responsible for enforcing standards and regulating stationary sources.

As directed by AB 32, CARB adopted the first Scoping Plan, which presented a set of actions designed to reduce overall GHG emissions in California. This initial Scoping Plan provided an economy-wide approach to reducing emissions and highlighted the value of combining carbon pricing with other complementary programs to meet California's 2020 GHG emissions target while ensuring progress in all sectors. Relative to transportation, the Scoping Plan included nine measures or recommended actions related to reducing vehicle miles traveled (VMT) and transportation-related GHGs through fuel and efficiency measures. These measures would be implemented statewide rather than on a project-by-project basis.

AB 32 requires CARB to update the Scoping Plan at least every 5 years. CARB released the First Update to the Climate Change Scoping Plan in May 2014 to provide information on the development of specific regulations and to adjust projections in consideration of the economic recession. The 2014 Update to the Scoping Plan presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for long-term progress beyond 2020. It also identified the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In response to Executive Order B-30-15 and Senate Bill (SB) 32, all state agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the Scoping Plan to reflect the 2030 target. The 2017 Update to the Climate Change Scoping Plan was approved by CARB on December 14, 2017 (CARB 2017). The 2017 Scoping Plan builds upon the framework established by the initial 2018 Scoping Plan and 2014 Update while identifying new, technologically feasible, and cost-effective strategies to ensure that the state meets its GHG reduction targets.

Subsequent to the 2017 Scoping Plan, CARB adopted more aggressive SB 375 targets in 2018 as one measure to support progress toward the Scoping Plan goals, which encourage Sustainable Communities Strategies (SCSs) that plan to achieve, in aggregate, a 19 percent reduction in statewide per capita GHG emissions reductions relative to 2005 by 2035 from passenger vehicles. However, CARB recognized that additional state and local actions are needed to achieve the transportation system reductions necessary to meet adopted climate goals, which is approximately a 25 percent reduction in statewide per capita GHG emissions by 2035 relative to 2005.

In 2022, CARB released a 2022 Scoping Plan Update, which includes a discussion of the relationship between local government actions and achievement of the state's long-term GHG emissions reduction goals, and non-binding recommendations to support local governments in their efforts to reduce GHG emissions. The 2022 Scoping Plan Update also lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279.

California Legislation on Climate Change

Other recent California legislation related to GHG emissions and climate change includes the following:

- Assembly Bill (AB) 1493 – Requires CARB to define standards for cars and light trucks manufactured after 2009.
- EO S-3-05 – Announced GHG emission reduction targets.
- AB 32 (Global Warming Solutions Act of 2006) – Requires CARB to adopt regulations to evaluate statewide GHG emissions and then create a program and emission caps to limit statewide emissions to 1990 levels.
- EO S-01-07 – Requires a statewide goal to be established to reduce the carbon intensity of California's transportation fuels.
- EO B-16-12 – Requires state agencies to increase the number of zero-emission vehicles (ZEV) within the state fleet through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZEV by 2015 and 20 percent by 2025.

- Senate Bill (SB) 97 – Acknowledges that climate change analysis is to occur in conjunction with the California Environmental Quality Act (CEQA) process and that the Governor's Office of Planning and Research (OPR) is responsible for developing CEQA Guidelines.
- SB 375 – Creates a process whereby local governments and other stakeholders work together within their region to achieve the reduction of GHG emissions.
- EO B-30-15 – Established a new interim statewide GHG emission reduction target.
- Climate Change Scoping Plan – Designed to reduce overall carbon emissions in California.
- CARB GHG Emission Inventory – Creates GHG emissions limits and requires an emissions inventory for the industries determined to be significant sources of GHG emissions.
- SB 32 – Extension of AB 32 requiring the state to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).
- SB 100 and 350 – Supports the reduction of GHG emissions from the electricity sector by accelerating California's Renewables Portfolio Standard (RPS) Program, which was last updated by SB 350 in 2015.
- SB 1383 – Requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants.
- EO B-55-18 – Established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter.
- EO N-79-20 – Established a new statewide goal of achieving 100 percent of in-state sales of new passenger cars and trucks will be ZEV by 2035, 100 percent of in-state sales of new medium and heavy-duty vehicles will be ZEV by 2045, and transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.
- AB 1279 (California Climate Crisis Act) - Declares the policy of the state both to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 also requires the state to ensure that updates to the Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California.
- California Building Code, Title 24 – Sets several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility.

3.7.3.3 Local

Santa Barbara County Air Pollution Control District

SBCAPCD monitors and regulates GHG emissions in the county. As a responsible agency under CEQA, SBCAPCD reviews and approves environmental documents prepared by other lead agencies or jurisdictions to reduce or avoid impacts on air quality and to ensure that the Lead Agency's environmental document is adequate to fulfill CEQA requirements. As a responsible agency, the SBCAPCD comments on environmental documents and suggests mitigation measures to reduce GHG

emissions. SBCAPCD reviewed the Notice of Preparation (NOP) and Scoping Document issued for the proposed Project and provided no comments at that time (Appendix A).

Santa Barbara County Clean Air Plan

The Federal CAAA of 1990 and the CCAA of 1988 mandate the preparation of plans for the attainment of air quality standards that provide an overview of air quality and sources of air pollution and identify pollution-control measures needed to meet federal and state air quality standards. The SBCAPCD and the Santa Barbara County Association of Governments (SBCAG) are responsible for formulating and implementing air quality attainment plans for Santa Barbara County.

To comply with these regulations, the County prepared an Air Quality Attainment Plan (AQAP) in 1979. The 1979 AQAP demonstrated that the area could not attain the Federal O_3 standard by the required attainment date of 1982 despite the implementation of all reasonably available control techniques on stationary sources. The Federal CAAA requires that air quality plans include "...such other measures as may be necessary to insure [sic] attainment and maintenance of such primary or secondary standards (for which the area is in a nonattainment status), including, but not limited to transportation controls..." To achieve this directive, land use control measures were and have been included in the AQAP to aid in future air quality planning efforts. Subsequent AQAPs have been issued in 1989 and 1991.

In 1994, the SBCAPCD began preparing a Clean Air Plan (CAP) to triennially update the AQAP. The CAP provides an overview of the regional air quality and sources of air pollution and identifies the pollution-control measures needed to meet clean-air standards. The schedule for plan development is outlined by federal and state requirements and is influenced by regional air quality. CAPs affect the development of SBCAPCD rules and regulations and other programs. They also influence a range of activities outside the district including transportation planning, allocation of monies designated for air quality projects, and more (SBAPCD 2022a).

The SBCAPCD 2022 Ozone Plan is the most recent triennial update to the County AQAP required by the state to show how SBCAPCD plans to meet the state 8-hour O_3 standard. Note that past ozone plan updates addressed both the Federal and State O_3 standards, but this plan addresses the state standards only because the SCCAB is designated "attainment" for the Federal 8-hour O_3 standards. The 2022 Ozone Plan builds upon and updates the 2019 Ozone Plan and includes an inventory of O_3 precursor emissions in the county, the most prevalent of which are reactive organic compounds (ROCs) and nitrogen oxides (NO_x). The 2022 Ozone Plan focuses on reducing O_3 precursor emissions by predicting vehicle activity trends and applying both stationary source emission control measures and transportation control measures, which reduce mobile-source emissions, the primary source of ROC and NO_x emissions in the county. The 2022 Ozone Plan satisfies both federal and state planning requirements and was adopted by the SBCAPCD Board in December 2022. CARB is in the process of redesignating the county from "nonattainment" to "nonattainment-transitional" for the State O_3 standards (SBCAPCD 2022).

County of Santa Barbara Climate Action Planning

In 2015, the adopted its Energy and Climate Action Plan (ECAP), a GHG emission reduction plan. The County has been implementing the ECAP's emission reduction measures since 2016. The ECAP established a goal of reducing GHG emissions in the unincorporated parts of the county to 15 percent

below 2007 levels by 2020 and identified 53 emissions reduction measures (ERMs) to achieve this goal (County of Santa Barbara 2015).

The ECAP Final Report evaluated the County's progress towards reaching its 2020 GHG emissions reduction goal that was established in 2015. An estimated 100,754 out of 226,760 (approximately 44 percent) MT CO_2e were reduced or avoided, and 41 out of 53 (approximately 77 percent) measures were either initiated or completed by 2020.

As outlined in the ECAP Final Report, the County did not meet the 2020 GHG emission reduction goal contained within the ECAP, and the ECAP is undergoing an update; therefore, at this time, a significance threshold is more appropriate for project-level GHG emission analysis, rather than tiering from the Environmental Impact Report (EIR) prepared for the ECAP. On January 26, 2021, the Santa Barbara County Board of Supervisors adopted interim GHG emissions thresholds of significance (interim thresholds). The interim thresholds apply to land use projects and plans that do not contain industrial stationary sources of GHG emissions. The interim thresholds are based on the County's 2030 GHG emission reduction target (50 percent below 2007 levels by 2030), which is in line with the state's GHG emission reduction goals (40 percent below 1990 levels by 2030). The interim thresholds are designed to identify: 1) a cumulatively considerable contribution to an existing adverse condition; and 2) a cumulatively significant impact in combination with other projects causing related impacts.

After the County did not meet the 2020 GHG emission reduction goal contained within the ECAP, the County began work updating the ECAP, GHG emissions forecasts, reduction targets, and GHG emissions reduction programs and policies as part of the Santa Barbara County 2030 Climate Action Plan. The County published the Draft 2030 Climate Action Plan for public review and comment in March 2023, and expects to adopt the plan in late 2023 (County of Santa Barbara 2022). The Draft 2030 Climate Action Plan includes updated GHG emissions forecasts, as well as goals and policies for reducing countywide GHG emissions below adopted targets by 2030, with the ultimate goal of achieving carbon neutrality by 2045. Further, the Draft 2030 Climate Action Plan is designed to be a quantified plan under CEQA, which will provide the County with the ability to streamline the environmental review process of future development projects.

County of Santa Barbara Collaborative Reach Code

The County and the cities of Goleta and Carpinteria are collaborating to develop and adopt local "reach" codes to reduce carbon emissions from new construction and development. "Reach" codes are local code amendments that extend beyond state energy-efficiency requirements. They are intended to support energy efficiency, electrification, and renewable energy that can reduce GHG emissions through the electrification, or requirement for new construction to be all-electric.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SBCAG's 2050 Connected Regional Transportation Plan (RTP)/SCS integrates land use and transportation strategies to achieve required emission reductions per SB 375. The RTP describes how the region plans to invest in the transportation system in the next 20 years. This long-range planning document includes a SCS as required by SB 375 (SBCAG 2021).

Santa Barbara County Association of Governments 2050 Regional Growth Forecast

The purpose of the Regional Growth Forecast is to provide consistent long-range population, job, and household forecasts for use in long-range regional planning to the year 2050 for Santa Barbara County, its major economic and demographic regions, and its eight incorporated cities. The Regional Growth Forecast is a requirement of the Connected 2050 RTP/SCS. The forecast is adopted by the SBCAG board and used in a variety of applications such as local General Plans, public service district forecasts, business development, transportation forecasts, and air quality planning. This forecast is based on the land use capacity of local general plans and takes input from all jurisdictions, the public, and the SBCAG board. The forecast is updated periodically as new demographic data, land use policies, and changes in growth assumptions warrant.

3.7.4 Environmental Impact Analysis

This section discusses the potential GHG emission impacts associated with the proposed Project. Where there are potentially significant, mitigation measures are proposed and the residual impact after mitigation is determined.

3.7.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact on GHG emissions if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

County of Santa Barbara Environmental Thresholds and Guidelines

On January 26, 2021, the County adopted interim GHG emissions thresholds of significance based on the County's 2030 GHG target (i.e., 50 percent below 2007 levels by 2030), which are in line with the state's GHG emission reduction goals. The interim GHG emissions thresholds are designed to identify: 1) a cumulatively considerable contribution to an existing adverse condition; and 2) a cumulatively significant impact in combination with other projects causing related impacts. Consistent with CEQA Guidelines Section 15064.7, the County developed and adopted these interim GHG emissions thresholds of significance through analysis of the reasonably foreseeable incremental contribution of a project's emissions to the effects of climate change. Projects or plans that comply with an applicable threshold will normally have an insignificant effect on the environment. Projects that exceed or otherwise do not comply with an applicable threshold may have a significant effect on the environment and, as a result, may require project modifications or mitigation measures to avoid or reduce those effects to insignificant levels. The following thresholds reflect this general guidance as

well as the specific guidance outlined in CEQA Guidelines Section 15064.4 regarding the significance of impacts from GHG emissions.

Per CEQA Guidelines Section 15064.4, the County considers the following factors, among others, when determining the significance of impacts from GHG emissions on the environment: 1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; 2) whether the project emissions exceed a threshold of significance that applies to the project; and 3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (e.g., CEQA Guidelines Section 15183.5[b]).

1. **GHG Emissions that May Have a Significant Impact.** The thresholds framework consists, first, of a numerical threshold (Screening Threshold) and, second, an efficiency threshold (Significance Threshold).[1] Numeric Screening and Significance Thresholds are applicable to development projects of various land use types, such as residential, commercial, and mixed use. These number thresholds are the emissions level below which a project's incremental contribution to global climate change is less than "cumulatively considerable." The County based the Screening Threshold on the types of land uses that the County permitted over a 10-year period (2010-2019). The County set the Screening Threshold at a level that captures the "fair share" of emissions from new development consistent with its 2030 GHG emissions target. The County based the Significance Threshold on the targeted level of emissions from new development in 2030 and projected population and employment for the unincorporated county for the same year. These interim GHG emissions thresholds of significance are recommended for use until completion of the County's 2030 Climate Action Plan, which is currently under preparation. These thresholds are provided below. Practitioners must compare anticipated GHG emissions against the numeric Screening Threshold. If a proposed project's estimated GHG emissions meet or exceed the Screening Threshold, staff will then compare project emissions to a Significance Threshold. To help determine if a project or plan would exceed the numeric Screening Threshold, the County Board of Supervisors adopted a "Size-Based Project Screening Criteria Table" (Table 3.7-2), which lists the types and sizes of projects that will typically emit less than the numeric Screening Threshold, based on historical permit research.

Table 3.7-2. County of Santa Barbara Size-Based Screening Criteria

Project Type	Size-Based Screening Criteria
Single-Family Housing	62,000 square feet
Multifamily Housing	55,000 square feet
Commercial Space	26,000 square feet
Regional Shopping Center	12,000 square feet
General Office Building	28,000 square feet

Source: County of Santa Barbara Planning and Development 2021.

- **Screening Criteria**
    - A project would have an insignificant impact if it would emit less than 300 MT CO_2e per year (Screening Threshold), or

[1] An "efficiency" type of threshold assesses the significance of GHG emissions from a land use project or plan. An efficiency threshold identifies a per-capita level of GHG emissions from new development that supports statewide reduction planning efforts (Association of Environmental Professionals 2016).

- Meets the criteria of the adopted "Size-Based Project Screening Criteria Table," which lists the types and sizes of projects that will typically emit less than 300 MT CO2e/year.

- **Significance Threshold**
  - A project would have an insignificant impact if it would generate less than 3.8 MT CO2e per service population, per year of GHG.

2. **Consistency with County GHG Emissions Reduction Plans, Policies, and Regulations.** The County Board of Supervisors adopted the ECAP in 2015 as the County's GHG emission reduction plan. The County has been implementing the ECAP since 2016; however, according to the 2015 ECAP Final Report, the County failed to meet its 2020 target emissions reduction goals. Until the 2030 Climate Action Plan is adopted, the County considered projects or plans that have emissions below interim thresholds to be consistent with County GHG emission reduction plans. The interim thresholds are part of the County's GHG emissions reduction strategy and were informed by the County's 2030 GHG reduction target. The interim thresholds provide a pathway for projects and plans to show compliance with County goals.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential and mixed use development, are not known. As a result, the impact analysis provided below does not specifically evaluate individual impacts at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for the lower and moderate-income affordability levels. The programmatic analysis provided by this Program EIR analyzes potential GHG emissions associated with potential future residential and mixed use development enabled under the Housing Element Update. As detailed below, this assessment estimates two potential construction development scenarios that could be enabled under the Housing Element Update to provide context for whether the future development would result in significant construction emissions. This assessment also considers operational emissions related to land use and development enabled by the Housing Element Update. This analysis also considers whether the proposed Project would conflict with all applicable federal, state, and local GHG regulations and policies.

Implementation of the proposed Project would result in GHG operational emissions directly from on-road mobile vehicles, electricity, and natural gas, and indirectly from water conveyance, wastewater generation, and solid waste handling. In addition, construction activities such as demolition, hauling, and construction worker trips would generate GHG emissions. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions have been estimated on an annual basis.

As discussed in detail in Section 3.3, *Air Quality* and summarized below, consistent with County and SBCAPCD methodologies, GHG emissions that would be generated from the development of maximum EIR buildout were estimated using California Emissions Estimator Model (CalEEMod) Version 2020.4.0. Calculation details are provided in the CalEEMod worksheet results in Appendix C. Given that the details of construction, design/size, and timing of each residential and mixed use development that could be enabled under the Housing Element Update are not known, default values

were assumed based on land use type and size in CalEEMod. Further, the CalEEMod results illustrate the possible GHG emissions that could occur under the proposed Project but are not based on site-specific development project details. The analysis of operational (i.e., long-term) GHG impacts employs modeling to forecast operational GHG emissions, including those from countywide vehicle trips, that may be generated under the Housing Element Update.

The information and analysis in this section are based on information from previous studies and EIRs prepared by the County or other local or regional agencies. These include 2021 Connected 2050 RTP/SCS EIR, the 2017 Cannabis Land Use Ordinance and Licensing Program EIR, the 2015 Winery Ordinance Update Project EIR, the 2016 Gaviota Coast Plan EIR, the 2015 Eastern Goleta Valley Community Plan EIR, and the 2014 Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments EIR, as well as the County's CAP and Ozone Plan, Comprehensive Plan Land Use Element – Air Quality Supplement, Climate Action Study, ECAP, and Draft Climate Action Plan, as well as the County's Climate Change Vulnerability Assessment (CCVA) and other work completed as part of the County's One Climate Initiative.

Construction GHG Emissions

The proposed Project would result in the development of residential and mixed use development. The specific construction details (e.g., amount, location, scheduling/phasing, equipment, size, and grading) for future sites are not known at this time and may vary. Construction equipment typically utilizes fossil fuels, which generate GHGs such as CO_2, CH_4, and N_2O. CH_4 may also be emitted during the fueling of heavy equipment. Since the exact nature of the origin or makeup of the construction locations and materials is unknown, this analysis provides a programmatic-level evaluation of construction-related GHG emissions. It is assumed that all construction equipment used would be diesel-powered. For this analysis, it is assumed that new residential and mixed use development in the unincorporated county would be constructed incrementally over the 8-year planning period.

Due to this assumption and uncertainty surrounding construction details and timing, it is impossible to accurately quantify all construction-related GHG emissions that may potentially occur. However, to provide a discussion of the potential range of construction-related impacts that could potentially occur from the development of individual uses under the proposed Project, potential construction emissions were calculated using CalEEMod under two separate residential project scenarios that could reasonably occur as a result of Project implementation. A detailed discussion of the methodology employed for modeling construction-related emissions using CalEEMod is presented in the *Construction Air Quality Impacts* discussion of Section 3.3.4.1, *Thresholds of Significance* (See Section 3.3, *Air Quality*.)

It should be noted that the CalEEMod construction emissions estimates do not account for construction procedures mandated by state law and local regulations, such as the California Code of Regulations Title 13, Division 3, Chapter 9, Article 4, Section 2423(b)(1), CARB construction equipment/vehicle idling restrictions, or adopted SBCAPCD rules. Further, the construction emissions estimates do not include any potential emission-reduction measures (e.g., watering of exposed soils to reduce dust, and limits on vehicle idling). As such, the construction emissions modeling is highly conservative in its assumptions.

Operational GHG Emissions

Residential development enabled by the Housing Element Update would also generate operational GHG emissions following completion and occupation. Similar to construction-related emissions, the

specific operational details (e.g., amount of new residential development, size of development, sites, equipment, utility demands) for future sites are unknown at this time. Operation of individual uses would generate GHG from on-site operations such as natural gas combustion for heating, electricity use, demand for water supplies, operation of equipment, disposal of solid wastes, and the use of consumer products. Operational GHG emissions that could occur over the lifespan of the Housing Element Update have been estimated using CalEEMod version 2020.4.0. A detailed discussion of the methodology employed for modeling operational emissions using CalEEMod is presented in the *Operational Air Quality Impacts* discussion of Section 3.3.4.1, *Thresholds of Significance* (Section 3.3, *Air Quality*).

Consistent with County thresholds and methodology, GHG emissions associated with the proposed Project have been compared against the County's interim GHG Significance Threshold of 3.8 MT CO_2e per year per service population. The resident service population for the Project has been estimated and described in Section 3.12, *Population and Housing* (Impact PH-1 and Table 3.12-14). As described therein, the resident population associated with the proposed Project is estimated to be 99,873, with an estimated resident population of 52,141 associated with the South Coast, and 47,731 associated with the North County. To define the Project employee service population, the number of full-time employees (FTE) is calculated as one FTE per 300 square feet of commercial area, consistent with the assumptions of the proposed Project's Transportation Study (Appendix F), including Project vehicle miles traveled (VMT) and other default traffic assumptions embedded in CalEEMod. Based on the Project's potential buildout of 1,549,170.8 square feet of commercial space, the estimated employee service population is 5,164 FTEs. In total, the service population for determining the proposed Project's GHG efficiency is 105,037 persons.

Similar to the construction emissions modeling scenarios, the CalEEMod default assumptions for calculating direct and indirect GHG emissions estimates do not reflect any additional sustainability features or development standards mandated by recent state and local regulations (e.g., water efficiency, and sustainable building standards). Nor do the indirect GHG emissions rates for electrical and natural gas supplies account for County enrollment in the Central Coast Community Energy (3CE) program, which delivers clean and renewably sourced electricity to existing and future customers throughout the county. Therefore, the operational emissions estimates represent a highly conservative, worst-case emission estimate. Further, default values for indoor and outdoor water demands and solid waste generation were overridden to reflect the water demand and solid waste generation rates calculated as part of this Program EIR (Section 3.15, *Utilities and Water Supply*). Mobile trip rate and trip length assumptions were also modified to achieve an overall annual VMT that reflects the VMT calculated for the proposed Project as part of the Program EIR's Transportation Analysis (Section 3.14, *Transportation* and Appendix F).

3.7.4.2 Project Impacts

Table 3.7-3 provides a summary of the proposed Project's impacts related to GHG emissions. A detailed discussion of each impact follows.

Table 3.7-3. Summary of GHG Emissions Impacts

GHG Emissions Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact GHG-1. The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	Insignificant	No mitigation required	Insignificant
Impact GHG-2. The proposed Project would not be inconsistent with applicable plans, policies, and regulations that are adopted to reduce GHG emissions.	Insignificant	No mitigation required	Insignificant
Cumulative Impacts	Insignificant	No mitigation required	Insignificant

Impact GHG-1. The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Construction

Residential and mixed use development enabled under the Housing Element Update would require construction activities that could generate construction-related GHG emissions, which are primarily associated with the use of off-road construction equipment and on-road vehicles (e.g., trucks, vendor trucks, and worker vehicles). Construction activities would depend on the timing of individual projects and would vary day by day, monthly, and annually through the planning horizon of 2031.

As described in the *Methodology* discussion under Section 3.7.4.1, *Thresholds of Significance,* modeling of construction emissions was performed using CalEEMod. Housing projects enabled by the Housing Element Update would not necessarily occur concurrently and it is not possible to estimate the type, extent, and equipment used in construction at any given time for the proposed Project. Therefore, to evaluate the potential for the proposed Project's implementation to result in significant annual GHG emissions, two CalEEMod model scenarios were prepared to estimate emissions from the largest potential development projects in North County and the South Coast that could occur as a result of Project implementation based on the sites inventory prepared for the Housing Element Update. Together, the two model scenarios combined represent approximately 15.6 percent of the total maximum Project residential buildout (5,378 units out of 34,558 units) and 23.7 percent of the maximum Project commercial buildout (364,000 square feet out of 1,534,800 square feet), which would represent reasonable maximum concurrent housing development estimates. In the absence of construction GHG emissions estimates associated with the combined development of new residential and commercial development under the maximum Program EIR buildout, GHG emissions from the construction of these individual projects were used to calculate a rough estimate of the total GHG emissions that could occur from concurrent housing development projects relative to the County's construction GHG thresholds. Consistent with County and SBCAPCD methodologies for evaluating GHG impacts, the combined total of construction-related GHG emissions is then amortized over the 30-year project lifetime and added to operational emissions. The combined amortized construction and operational emissions are then compared against the adopted numerical Screening Threshold and efficiency-based Significance Threshold. Therefore, the determination of significance is addressed in the operational emissions discussion below.

As summarized in Table 3.7-4 below, construction associated with Project buildout could result in an estimated total of 138,815.19 MT CO_2e when conservatively assuming the two model scenarios represent 15.6 percent of the Project buildout. Estimated construction emissions amortized over 30 years would be approximately 4,627.17 MT CO_2e per year.

Table 3.7-4. Estimated Construction GHG Emissions (MT CO_2e)

	Total Combined CO_2e Emissions
Scenario 1: Potential Rezone Site No. 1 (Giorgi) (South Coast)	11,193.15
Scenario 2: Potential Rezone Site No. 19 (Key Site 1) (Santa Maria Valley)	10,462.02
Total Combined Emissions	21,655.17
Combined % of Maximum EIR Buildout	15.6
Total Emissions Associated with Project Buildout	138,815.19
Amortized Over 30 Years	4,627.17

Operational Emissions

Residential and mixed use development enabled by the Housing Element Update would generate long-term operational GHG emissions. Operational GHG emissions would largely be generated through mobile-source emissions (vehicle trips), area-source emissions (e.g., landscaping equipment), and energy-source emissions (electricity, natural gas). As described in the *Methodology* discussion under Section 3.7.4.1, *Thresholds of Significance,* modeling of operational emissions was performed using CalEEMod. The estimated annual operational GHG emissions, along with amortized construction emissions estimated above, are presented in Table 3.7-5. As presented therein, the operation of the proposed Project is estimated to generate approximately 342,987.97 MT CO_2e per year. Combined with amortized construction emissions of reasonable maximum concurrent housing development estimates, the Project would generate an estimated 347,614.14 MT CO_2e per year of net new GHG emissions countywide. The amount of emissions generated by the Project would exceed the County's adopted screening criteria of 300 MT CO_2e per year. As a result, operational emissions, including amortized emissions, are compared against the County's GHG efficiency threshold of 3.8 MT CO_2e per person per year.

As described above under the *Methodology* discussion of Section 3.7.4.1, *Thresholds of Significance*, the proposed Project would result in a service population of 105,037. This service population would result in a GHG per service population of 3.3 MT CO_2e per person per year, which would be less than the County's adopted Significance Threshold of 3.8 MT CO_2e per service population. Though the Project would exceed the County's adopted Screening Threshold due to the sheer amount of potential development, by generating less GHG per capita than the County's Significance Threshold, these GHG estimates indicate that the proposed Project, as a whole, would be more efficient or generate less GHG per capita than many existing uses in the unincorporated county due to more efficient building design, the use of more sustainable energy supplies, efficient land use planning, and many other factors. Therefore, the impacts of the proposed Project for the generation of new construction and operation-related GHG emissions would be *insignificant.*

Table 3.7-5. Estimated Maximum Operational GHG Emissions (MT CO_2e)

	Total Combined CO_2e Emissions
South Coast	112,659.90
North County	230,327.07
Amortized Construction GHG Emissions	4,627.17
Total Combined GHG Emissions	347,614.14
Project Service Population	105,037
GHG per capita	3.3
Significance Threshold (GHG per Capita)	3.8
Above Threshold?	No

It should be noted that the GHG estimate for the proposed Project is conservative because the Housing Element Update enables housing and mixed use development in existing urban communities, thus creating opportunities for many employees within the county to live closer to their jobs. This would increase the proportion of workers that currently both reside and work in the county, potentially decreasing mobile sources of GHG emissions. Therefore, despite the highly conservative assumptions made in this analysis, GHG emissions associated with the proposed Project would remain insignificant when compared to adopted thresholds.

Impact GHG-2. The proposed Project would not be inconsistent with applicable plans, policies, and regulations that are adopted to reduce GHG emissions.

As described in Section 3.7.3.3, *Local,* the County's ECAP is no longer applicable. The Draft 2030 Climate Action Plan includes updated GHG emissions forecasts, as well as goals and policies for reducing countywide GHG emissions below adopted targets by 2030, with the ultimate goal of achieving carbon neutrality by 2045. Further, the Draft 2030 Climate Action Plan is designed to be a quantified plan under CEQA, which will provide the County with the ability to streamline the environmental review process of future development projects. However, the Draft 2030 Climate Action Plan is still under preparation and is not yet adopted. As such, as described above in Section 3.7.4.1, *Thresholds of Significance,* comparison, or evaluation under the Draft 2030 Climate Action Plan cannot be relied upon, and until adoption of the County's Draft 2030 Climate Action Plan, the County considers projects or plans that have emissions below interim thresholds to be consistent with the County's GHG emission reduction plans. The interim thresholds are part of the County's GHG emissions reduction strategy and were informed by the County's 2030 target. The interim thresholds provide a pathway for projects and plans to show compliance with County goals. The County's interim GHG thresholds are also consistent with CARB's recommendation for setting project-level thresholds, as well as the state's Scoping Plan and long-term GHG goals. As described in Impact GHG-1 above, implementation of the proposed Project would not result in the generation of new GHG emissions in exceedance of interim thresholds. As such, the Project is not considered to be potentially inconsistent with applicable plans, policies, and regulations adopted for reducing GHG emissions, and Project impacts are considered *insignificant.*

3.7.4.3 Cumulative Impacts

Due to the global context of climate change, the analysis of GHG emissions is inherently cumulative because impacts are caused by cumulative global emissions. As described in Section 3.7.4.2, *Project Impacts*, the proposed Project would have *insignificant* impacts related to GHG emissions. Therefore,

the implementation of the proposed Project would not have a considerable contribution to a cumulatively significant impact related to GHG emissions.

3.7.4.4 Proposed Mitigation

No mitigation measures are required.

3.7.4.5 Secondary Impacts

No mitigation measures are required to reduce Project impacts. Therefore, no direct secondary impacts would occur.

3.7.4.6 Residual Impacts

Impact GHG-1. Implementation of the proposed Project would not result in the generation of new GHG emissions that would exceed the County's adopted interim GHG thresholds. Residual impacts would be *insignificant.*

Impact GHG-2. Implementation of the proposed Project would not result in the generation of new GHG emissions that would exceed the County's adopted interim GHG thresholds. The County's adopted interim GHG thresholds are part of the County's GHG emissions reduction strategy and were informed by the County's 2030 GHG reduction target. Until the County adopts the 2030 Climate Action Plan, the County considers projects and plans that do not exceed the interim thresholds to be considered with County GHG emissions reduction plans. Therefore, residual impacts would be *insignificant.*

Section 3.8
Hazards and Hazardous Materials

3.8.1 Introduction

This section describes potential impacts on cultural and tribal cultural resources that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). This section identifies existing hazards in unincorporated areas of Santa Barbara County, including hazardous materials, natural disasters, and land use operations, such as airports. Hazardous materials involve chemicals, such as petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated materials, that can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Risks to public health and the environment may occur in areas contaminated by historical releases of hazardous materials. Contaminated soil or water may be released during ground disturbance, exposing people and the environment to potentially toxic substances.

A range of other types of hazards are addressed in other sections of this Program Environmental Impact Report (EIR) as follows: air pollution hazards, such as toxic air contaminants (TACs) and particulate matter, are addressed in Section 3.3, *Air Quality*; water pollution hazards, such as groundwater contamination and surface runoff, are addressed in Section 3.9, *Hydrology and Water Quality*; urban hazards and response systems are discussed in Section 3.13, *Public Services and Recreation*; wildfire impacts are discussed in Section 3.16, *Wildfire*; and hazardous solid waste disposal is addressed in Section 3.15, *Utilities and Water Supply*. Geologic hazards, such as earthquakes are addressed in Section Chapter 5, *Other CEQA Issues*.

3.8.2 Environmental Setting

There are a variety of agricultural, commercial, and industrial uses within Santa Barbara County that involve the transport, use, storage, and disposal of potentially hazardous materials that could adversely affect soil and groundwater. Current and former uses involving hazardous materials, resulting in the potential for past and/or ongoing site contamination, exist in each of the five Housing Market Areas (HMAs) identified in the Housing Element Update. Hazardous materials may be found in the materials of older buildings, such as asbestos or lead-based paints, or may have been used routinely for the operation of certain land uses, such as auto repair shops, gas stations, oil and mining facilities, commercial agricultural fields, medical offices, dry cleaners, and photo processing centers. Potentially hazardous materials that currently occur throughout the county are commonly found in urban and agricultural areas and generally include cleaning and metal solvents, pesticides/herbicides, paints, oils, and lubricants. In addition, some properties in the county have experienced substantial historical releases of hazardous materials resulting in potentially contaminated soils and/or groundwater onsite and in the vicinity (Section 3.8.2.1, *Hazardous Sites*). Hazardous waste generators and contamination sites may have involved or continue to involve hazardous operations, contain aboveground storage tanks (ASTs) and underground storage tanks (USTs) containing fuel, utilize flammable or explosive substances and other hazardous compounds, and/or expose workers and

people involved with nearby uses to known hazards associated with these heavy industrial and commercial uses. Land uses that are particularly sensitive to the release of hazards or hazardous materials include residential, educational, assisted living, daycare, and agricultural, all of which are located in the Urban Area and Rural Area throughout the county.

Several highways are the primary transportation routes through the county, which present a risk of possible spills of hazardous materials (Federal Motor Carrier Safety Administration 2009). Primary transportation routes include the U.S. Highway 101 (the main vehicular travel corridor within and through the county) as well as State Routes (SR) 1, 33, 135, 150, 154, 166, 192, 217, and 246, which primarily provide access within the county and connect many incorporated and unincorporated communities. Transportation of hazardous materials often occurs along major arterial roads and local streets through populated and urbanized areas.



U.S. Highway 101 is a major connecting road throughout the county, shown here after it reopened after the debris flows in early 2019. Source: Caltrans.

In addition, the county includes the Santa Barbara Municipal Airport, Santa Maria Public Airport, Santa Ynez Airport, Lompoc Airport, and New Cuyama Airport, which present a potential for hazards associated with aviation incidents. Vandenberg Space Force Base (VSFB) also presents the potential for hazards associated with aviation, satellite launches, and ballistic missile testing.

3.8.2.1 Hazardous Sites

California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to compile, maintain, and update specified lists of hazardous material release sites. The California Environmental Quality Act (CEQA) Guidelines (Public Resources Code [PRC] Section 21092.6) requires the Lead Agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether the Project and any alternatives are identified on any of the following lists:

- **USEPA National Priorities List:** Lists all sites under the U.S. Environmental Protection Agency (USEPA) Superfund program, which was established to fund the cleanup of contaminated sites that pose risks to human health and the environment.
- **USEPA CERCLIS and Archived Sites**: The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list contains 15,000 sites nationally identified as hazardous sites. This would also involve a review of archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned status.
- **USEPA RCRIS (RCRAInfo)**: Resource Conservation and Recovery Act Information System (RCRIS or RCRAInfo) is a national inventory system for hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.

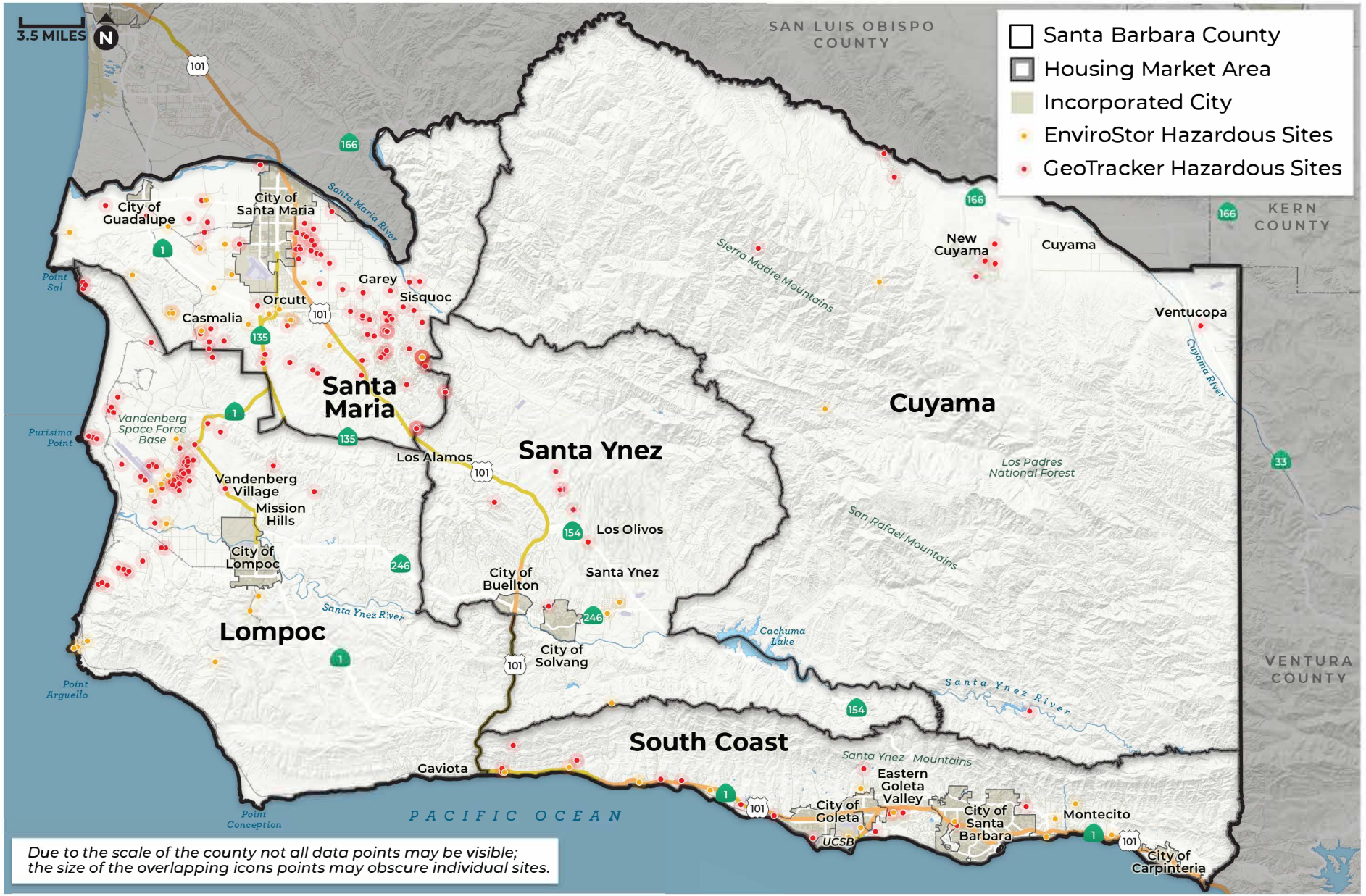
- **DTSC Cortese List**: The California Department of Toxic Substances Control (DTSC) maintains the Hazardous Waste and Substances Sites (Cortese) List as a planning document for use by state and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet**: DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS**: Leaking Underground Storage Tank Information System (LUSTIS). The State Water Resources Control Board (SWRCB) maintains an inventory of underground storage tanks and leaking underground storage tanks, which tracks unauthorized releases.

Reviews of the DTSC's EnviroStor database and the SWRCB's GeoTracker database indicate a variety of hazardous waste reporting facilities located throughout each of the county's five HMAs (Figure 3.8-1). There are 1,494 known past or existing regulated hazardous sites within the county, which have required regulatory oversight to address site contamination issues (DTSC 2022; SWRCB 2022). Of these, 1,117 sites are closed and 377 sites remain open. Of the 377 open sites, 184 are located within the unincorporated areas of the county where future residential development associated with the proposed Project may occur. These include one federal Superfund site and two leaking underground storage tank (LUST) sites. Table 3.8-1 provides a summary of the number of each type of site along with a definition of site type for the 184 open sites in the unincorporated county.



The Casmalia Resources Hazardous Waste Landfill is the only Superfund site in the county. The facility was closed in 1989. Source: E&E Construction

There is one Superfund site within the county. This site is a contaminated hazardous waste dumping site regulated under CERCLA: the Casmalia Hazardous Waste Management Facility (also known as the "Casmalia Resources Superfund Site") (County of Santa Barbara 2022). It is located in the North County near the small, unincorporated community of Casmalia and is a 252-acre inactive commercial hazardous waste treatment, storage, and disposal facility whose operations caused contaminated soil, soil vapor, surface water, sediment, and groundwater with hazardous chemicals. Since its designation as a Superfund site in the early 1990s, the USEPA has prepared a Remedial Investigation and Proposed Plan outlining the cleanup of the site. The Proposed Plan was approved by the USEPA on June 28, 2018 (County of Santa Barbara 2022).



Santa Barbara County Hazardous Sites

FIGURE 3.8-1

Table 3.8-1. Known Regulated Hazardous Sites within the Unincorporated County

Site Type	Number of Sites	Definition	Source of Definition
Active Project	1	Project (Beta) is a multipurpose site type varying from source investigation projects to a SWRCB grant-funded project for groundwater cleanup (e.g., Proposition 1 Groundwater Sustainability Program). A Project may be comprised of multiple sites or facilities, a single or group of impacted supply wells, or a groundwater plume of interest.	SWRCB 2022
Cleanup Program Site	86	Includes all "non-federally owned" sites that are regulated under the SWRCB's Site Cleanup Program and/or similar programs conducted by each of the nine Regional Water Quality Control Boards (RWQCBs). Includes pesticide and fertilizer facilities, rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, mine sites, landfills, Resource Conservation and Recovery Act (RCRA) / Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) cleanups, and some brownfields. Unauthorized releases detected include but are not limited to hydrocarbon solvents, pesticides, perchlorate, nitrate, heavy metals, and petroleum constituents, to name a few.	SWRCB 2022
Federal Superfund	1	Sites managed by the USEPA under the CERCLA, informally referred to as "Superfund sites."	USEPA 2022
Inactive	16	Of these 16 inactive sites, 13 are inactive pending military evaluation, one is inactive pending a school investigation, one is inactive pending a tiered permit, and one is inactive pending voluntary cleanup.	SWRCB 2022
Land Disposal Site	18	Includes sites with solid and/or liquid wastes discharged to land, such as landfills, mines, surface impoundments, waste piles, and land treatment facilities.	SWRCB 2022
LUST Cleanup Site	2	Includes all UST sites that have had an unauthorized release (i.e., leak or spill) of a hazardous substance, usually fuel hydrocarbons, and are being cleaned up.	SWRCB 2022
Non-Case Information	1	Sites that either have no unauthorized release, have a release to the environment with minimal impact, or are currently evaluated for impacts and may result in the activation of a new case. Non-Case Information Sites contain environmental data, location data, or potential source information that may be considered important to a given area.	SWRCB 2022
NPDES	2	The National Pollutant Discharge Elimination System (NPDES) addresses water pollution by regulating point sources that discharge pollutants to waters of the U.S. These are sites with active NPDES permits.	USEPA 2022
Other Oil and Gas Projects	8	Includes information regarding select oilfield activities that may not be associated with well-stimulation activities but may be pertinent to investigation activities in a given area.	SWRCB 2022

Table 3.8-1. Known Regulated Hazardous Sites within the Unincorporated County (Continued)

Site Type	Number of Sites	Definition	Source of Definition
Produced Water Ponds	27	Includes surface impoundments used to store and/or dispose of water produced during oil production. Includes permitted and unpermitted surface impoundments and current status (i.e., active, inactive, or historical).	SWRCB 2022
Underground Injection Control	22	Includes information regarding wells used for disposing of oilfield fluids by subsurface injection. Such injection is also sometimes used to enhance oilfield production.	SWRCB 2022
Total	184		

Source: DTSC 2022, SWRCB 2022

A review of the USEPA's Envirofacts database allows for the review of multiple environmental databases for facilities within the county, including brownfields. A brownfield is a property the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. A review of this database indicated three brownfield properties are located within the county: Wetlands Project, Goleta Old Town Project Area, and the New Continuation High School (USEPA 2015b). These three county properties are located in the incorporated cities of Guadalupe, Goleta, and Santa Maria, respectively, outside of the proposed Project area. Another 65 facilities within the county are recorded in the USEPA's Toxic Release Inventory System (TRIS) (USEPA 2015a). TRIS tracks the management and storage of over 650 chemicals that may pose a threat to human health and the environment. No facilities within the county with current violations, significant violations, or quarters of noncompliance were listed in the Enforcement and Compliance History Online database. Further, no facilities within the county are listed on the Radiation Information System database, which provides information on facilities that are regulated by the USEPA for radiation and radioactivity (USEPA 2015a).

Santa Maria Valley

Countywide within the Santa Maria Valley, there are 494 hazardous sites identified in the EnviroStor and GeoTracker databases, 287 of which remain open (DTSC 2022; SWRCB 2022) (Figure 3.8-1). Of these, 132 are located within the unincorporated parts of the county, including the Casmalia Resources Superfund Site, 7 inactive sites, 68 cleanup program sites, 12 land disposal sites, 22 produced water ponds, 3 other oil and gas projects, and 19 underground injection control sites. Most of these sites are located in Orcutt or between Orcutt and Casmalia, with a few sites located further south between Orcutt and Los Alamos.

Hazards in proximity to Orcutt include the Santa Maria Public Airport, as well as the Santa Maria, Orcutt, and Cat Canyon Oil Fields. There are 12 sites from the EnviroStor and GeoTracker databases in Orcutt, including one inactive site pending military evaluation, 4 cleanup program sites, 1 land disposal site, and 6 produced water ponds (DTSC 2022; SWRCB 2022).

Lompoc Valley

Within the Lompoc Valley, there are 99 hazardous sites identified in the EnviroStor and GeoTracker databases, 17 of which remain open (DTSC 2022; SWRCB 2022) (Figure 3.8-1). In the unincorporated parts of the Lompoc Valley, there are four open sites, including one inactive site pending military evaluation, one LUST cleanup site, one other oil and gas project, and one underground injection

control site. The LUST cleanup site is located near the southwest corner of the City of Lompoc, and the rest are between the City of Lompoc, Vandenberg Village, and VSFB.

Santa Ynez Valley

Within the Santa Ynez Valley, there are 91 hazardous sites identified in the EnviroStor and GeoTracker databases, 10 of which remain open, and all of which are located within the unincorporated areas of the county (DTSC 2022; SWRCB 2022) (Figure 3.8-1). These include six cleanup program sites, one land disposal site, one other oil and gas project, and two underground injection control sites. These sites are located outside of the urban core of the Santa Ynez Valley where the cities of Buellton and Solvang are located; the sites are further south and north towards Los Olivos.

Cuyama Valley

Within the Cuyama Valley, there are 24 hazardous sites identified in the EnviroStor and GeoTracker databases, 11 of which remain open and all of which are located within the unincorporated areas of the county (DTSC 2022; SWRCB 2022) (Figure 3.8-1). These include one cleanup program site, three land disposal sites, five produced water ponds, and two other oil and gas projects. There are no open sites in the unincorporated communities of Cuyama or New Cuyama.

South Coast

Within the South Coast, there are 1,494 hazardous sites identified in the EnviroStor and GeoTracker databases, 377 of which remain open (DTSC 2022, SWRCB 2022) (Figure 3.8-1). Of these, 27 are located within the unincorporated parts of the county, including 8 inactive sites, 11 cleanup program sites, 2 land disposal sites, 2 NPDES permits, 1 other oil and gas project, 1 non-case information site, 1 active project, and 1 LUST cleanup site. One of the NPDES permit sites is in the Eastern Goleta Valley, and the other is in Montecito. Of the 11 cleanup program sites, 5 are in the Eastern Goleta Valley, 4 are in Gaviota, and 2 are between Gaviota and Goleta. The LUST site is within the Eastern Goleta Valley along U.S. Highway 101.

Hazards in Eastern Goleta Valley stem from oil and gas operations, businesses that handle hazardous materials, LUSTs from gas stations, and airport approach zones associated with Santa Barbara Airport. There are nine open hazardous sites within the Eastern Goleta Valley, including two that are inactive pending military evaluation, one NPDES permit site, five cleanup program sites, and one active project (DTSC 2022; SWRCB 2022). The cleanup program sites are concentrated along Hollister Avenue and SR 154.

3.8.2.2 Hazardous Materials Incidents

As described in the Santa Barbara County 2022 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), several significant hazardous material incidents have occurred in the county in the past century, including the oil spills in 1969, 1997, 2007, 2008, 2015, and 2020. Table 3.8-2 summarizes the 961 hazardous materials incidents reported to the California Office of Emergency Services (CalOES) Warning Center from 2006 through 2023 based on location. These incidents include both transportation and fixed-facility incidents both within (122 total incidents) and outside (839 total incidents) the Project area. This list does not capture all hazardous material spills within the county, only those that were significant enough to be reported to CalOES. The data indicates that hazardous

materials incidents can occur across the county with a greater frequency in the more developed areas, such as the incorporated cities outside the Project area.

Table 3.8-2. Hazardous Materials Incidents in Santa Barbara County by Location and Type

Location	Incidents
Buellton (City of)	6
Carpinteria (City of)	31
Casmalia	1
Goleta (City of)	58
Guadalupe (City of)	5
Isla Vista	1
Lompoc (City of)	15
Los Olivos	4
Montecito	14
Orcutt	6
Santa Barbara (City of)	638
Santa Maria (City of)	86
Santa Ynez	4
Summerland	3
Total of Other Unincorporated Communities	89

Type	Incidents
Chemical	37
Chemical (Vapor)	5
Other	21
Petroleum	618
Petroleum (Unspecified)	2
Petroleum (Vapor)	2
Radiological	1
Railroad	71
Sewage	130
Unspecified	30
Vapor	40

Source: CalOES 2023.
Note: 2023 data was only available through June 1, 2023.

For example, a hydrogen sulfide (H_2S) release occurred on February 11, 2010, at the Venoco Ellwood Onshore Oil and Gas Processing Facility within the western portion of the City of Goleta. The plant formerly treated crude oil and gas produced from Platform Holly, which is located approximately 2.5 miles offshore. H_2S is a toxic material with the potential to cause human fatalities given sufficient exposure duration and concentration. Less severe hazards include the risk of a trucking accident and subsequent release of hazardous materials from one of the trucks transporting natural gas liquids, liquefied petroleum gas, or sulfur cake. H_2S gases are also known to occur in the unincorporated agricultural areas north and west of the City of Goleta due to groundwater in the region containing sulfur compounds, including H_2S.

3.8.2.3 Hazardous Materials and Agriculture

Agricultural production activities, including both conventional and organic agriculture, occur throughout the county. (Section 3.2, *Agricultural Resources* provides a more detailed discussion of agricultural land within the county.) Agricultural activities involve the use of regulated hazardous materials, particularly commercial pesticides. Pesticide use is regulated by the County Agricultural Commissioner's Office with permits required for pesticide application. Such pesticide use is carefully regulated under state law and consistent with guidelines issued by the California Department of Pesticide Regulation (DPR). Such regulations generally govern the type of pesticide applied, as well as the location, timing, and rules of application. Special consideration is given to applications near schools. The Agricultural Commissioner's Office also regulates fumigation within the county and requires permits for the application of fumigants that incorporate DPR-suggested guidelines for use.

Pesticides – including rodenticides, insecticides, herbicides, fungicides, and other pest-controlling substances – are applied in various locations throughout the county to support the commercial cultivation of crops and to control pests on residential properties. Consequently, pesticides, fertilizers, and associated contaminants may be present in near-surface soils in residual concentrations at these locations. Many irrigated lands are currently required to operate under the Irrigated Lands Regulatory Program (ILRP) to regulate the runoff of pesticides, fertilizers, and sediments from irrigated lands through Waste Discharge Requirements issued by the SWRCB.

In addition, hazardous materials typically associated with commercial agricultural uses in the county include petroleum products (e.g., gasoline, diesel, oil) and other materials associated with the operation and maintenance of equipment (e.g., lubricants, antifreeze, solvents). Some agricultural properties within the county may also contain ASTs and USTs to store fuels and other potentially hazardous materials.

3.8.2.4 Natural Gas Pipeline Rupture and Storage Facility Incidents

Pacific Gas & Electric (PG&E), which serves North County communities, and Southern California Gas (SoCalGas), which serves the South Coast, deliver natural gas through pipeline systems throughout the county. SoCalGas also operates a natural gas storage field, the La Goleta Storage Field, at More Ranch Road in the Eastern Goleta Valley. As summarized in the 2022 MJHMP, there are transmission lines and high-pressure distribution lines throughout the entire county, many of which are in areas with high seismic activity and crossing active faults (County of Santa Barbara 2022).

As documented in the 2022 MJHMP, there have been two recent natural gas incidences in the county. The post-Thomas Fire debris flows in Montecito on January 9, 2018, caused the failure of a natural gas line that runs along East Mountain Drive and a massive explosion caused several homes to catch fire. Regionally, on October 23, 2015, SoCalGas crews discovered a leak at the natural gas storage well at Aliso Canyon, the largest natural gas storage facility in California. The storage facility is located in the Santa Susana Mountains of Los Angeles County. After several attempts, SoCalGas stopped the leak on February 12, 2016, sealing the well on February 15, 2016. It was plugged and abandoned before being reopened at reduced capacity in July 2017 (County of Santa Barbara 2022).

3.8.2.5 Oil Extraction Areas

As summarized in the County's 2022 MJHMP, Santa Barbara County has produced oil and gas since the late 1800s. In 1896, oil producers constructed piers to access the underwater portion of the Summerland Oil Field, marking the beginning of offshore oil production, with intensive oil development along the shorelines of the Goleta and Gaviota coasts following. Many of these older historic wells were improperly abandoned, presenting environmental hazards in the surf zone, offshore, and onshore. There are more than a dozen operational oil platforms located along the coast of Santa Barbara County, although several are moving toward decommissioning, and others stopped operating after a rupture caused by the 2015 Refugio Oil Spill. Onshore oil processing continues at facilities, such as Las Flores Canyon on the Gaviota Coast, although oil is not currently sent out of Las Flores Canyon, the oil conveyance infrastructure in the county includes the existing 123.4-mile pipeline system known as Lines 901 and 903 and modify related equipment. Line 901 stretches from Las Flores to Gaviota. Line 903 runs north from Gaviota to Pentland Station in Kern County through the Cuyama Valley. After a 2015 spill, Line 901, the line that ruptured, was shut down. Since then,

seven offshore oil platforms have been shut down, including, from north to south, Hidalgo, Harvest, Hermosa, Heritage, Harmony, Hondo, and Holly (County of Santa Barbara 2022). Other facilities, such as the Chevron processing facilities pier in Carpinteria and production near Santa Maria are initiating decommissioning.

Major onshore oil production continues throughout the county, with more than 4,000 producing onshore wells in the county. In the Santa Maria Valley, there are several petroleum-related oil and gas pipelines with major lines along Bradley Road and California Boulevard. Some of these lines are idle (not permanently abandoned) and have the potential to carry toxic H_2S. These lines extend south through the foothills and are tied into the Cat Canyon Oil Field in the Solomon Hills approximately 10 miles southeast of Santa Maria and the Orcutt Hill Oil Field in the Solomon Hills and Careaga Canyon south of Orcutt. High-pressure gas lines also exist along California and Solomon roads, as well as along portions of Blosser Road, Clark Avenue, and SR 1.

Oil spills can occur in any part of the county where existing oil and gas operations are located. This includes the offshore environment, where there are several platforms and undersea pipelines, or the onshore environment, through supply pipelines and well facilities. There have been 11 oil spills in the county between 1969 and 2020 (County of Santa Barbara 2022).

Ongoing oil production, processing, and associated transport (e.g., through the use of pipelines, vehicles, and limited train transport) in the county presents the potential for hazards due to spills, groundwater contamination, air pollutant emissions, etc.

3.8.2.6 Airport Safety Zones

In addition to being within the flight pattern of many airports providing regional flights (i.e., Los Angeles International, San Francisco International, Oakland, San Jose International, Burbank Airport, John Wayne Airport, Long Beach Airport, Ontario International Airport), the County has five airports located in Santa Maria, Lompoc, Santa Ynez, New Cuyama (recently re-opened in October 2022), and Santa Barbara. The county also has one military base, VSFB, which is located within the Lompoc Valley.

As the Airport Land Use Commission (ALUC) for Santa Barbara County, SBCAG is responsible for protecting public health, safety, and welfare by ensuring that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations. SBCAG's Airport Land Use Compatibility Plans (ALUCPs) serve as a tool for the ALUC to review land use plans and development proposals within Airport Influence Areas (AIA).[1] As discussed further in Section 3.10, *Land Use and Planning*, these plans also provide land use compatibility policies and criteria



The Santa Barbara Airport is the largest commercial airport in the County.
Source: Santa Barbara Independent

[1] The Airport Influence Area (AIA) is a composite of the areas surrounding the airport that are affected by noise, height, and safety considerations.

applicable to local jurisdictions in their preparation or amendments of the Comprehensive Plan. It should be noted that the Santa Barbara County ALUCPs do not address New Cuyama Airport. The Draft New Cuyama Airport ALUCP (2019) was not finalized.

The designated safety zones for the airports within the county were developed by SBCAG based on guidance provided in the California Airport Land Use Planning Handbook, which includes dimensions for "generic" safety zones (California Department of Transportation [Caltrans] 2011). These safety zones are geometric shapes representing areas of the progressive degree of risk of aircraft accidents based on a statistical analysis of accident locations. Typically, the closer to the runway end, the higher the risk of an airplane accident. While the number of safety zones at an airport may vary based on the airport's unique operating conditions, the Handbook guides six safety zones. Table 3.8-3, below, describes these safety zones in detail, including the zone reference, typical aircraft activity and flight characteristics, and flying altitudes.

Table 3.8-3. Summary of Airport Safety Zones 1 - 6

Safety Zone	Description
Safety Zone 1	• Runway Protection Zone • Reflects areas where aircraft are on very close approach or departure • Altitude: Typically less than 200 feet above the runway.
Safety Zone 2	• Inner Approach/Departure Zone • Aircraft overflying at low altitudes on final approach and straight-out departure • Altitude: Between 200 and 400 feet above the runway.
Safety Zone 3	• Inner Turning Zone • Aircraft, (especially smaller, piston-powered aircraft) turning base to final on landing approach or initiating turn to en route direction on departure • Altitude: Less than 500 feet above the runway, particularly on landing.
Safety Zone 4	• Outer Approach/Departure Zone • Approaching aircraft usually at less than traffic pattern altitude. Particularly applicable for busy general aviation runways (because of elongated traffic patterns), runways with straight-in instrument approach procedures, and other runways where straight-in or straight-out flight paths are common; • Altitude: Less than 1,000 feet above the runway
Safety Zone 5	• Sideline Zone • Area not normally overflown; primary risk is with aircraft losing directional control on takeoff; excessive crosswind gusts or engine torque; • Altitude: Runway elevation
Safety Zone 6	• Traffic Pattern Zone • Aircraft within a regular traffic pattern and pattern entry routes; • Altitude: Ranging from 500 to 1,500 feet above the runway.

Sources: Caltrans 2011.

Safety Zone 1 is the most restrictive zone around an airport and is subject to the greatest danger. Safety Zone 1 generally prohibits any type of development within this zone. Safety Zones 2 through 6 designate allowable development densities based on the type of development allowed (SBCAG 2023a, 2023b, 2023c, and 2023d). Residential density restrictions in Safety Zones 2, 4, and 6 directly relate to the unincorporated areas of the county addressed by the proposed Project and are summarized below and depicted in detail in Figure 3.8-2.[2] Residential accessory units, including accessory dwelling units (ADUs), caretaker units, and family daycares, are compatible with all three of these zones. For other types of residential developments, compatible uses depend on the safety zone and density of the proposed development. The safety zones that relate to the proposed Project include the following:

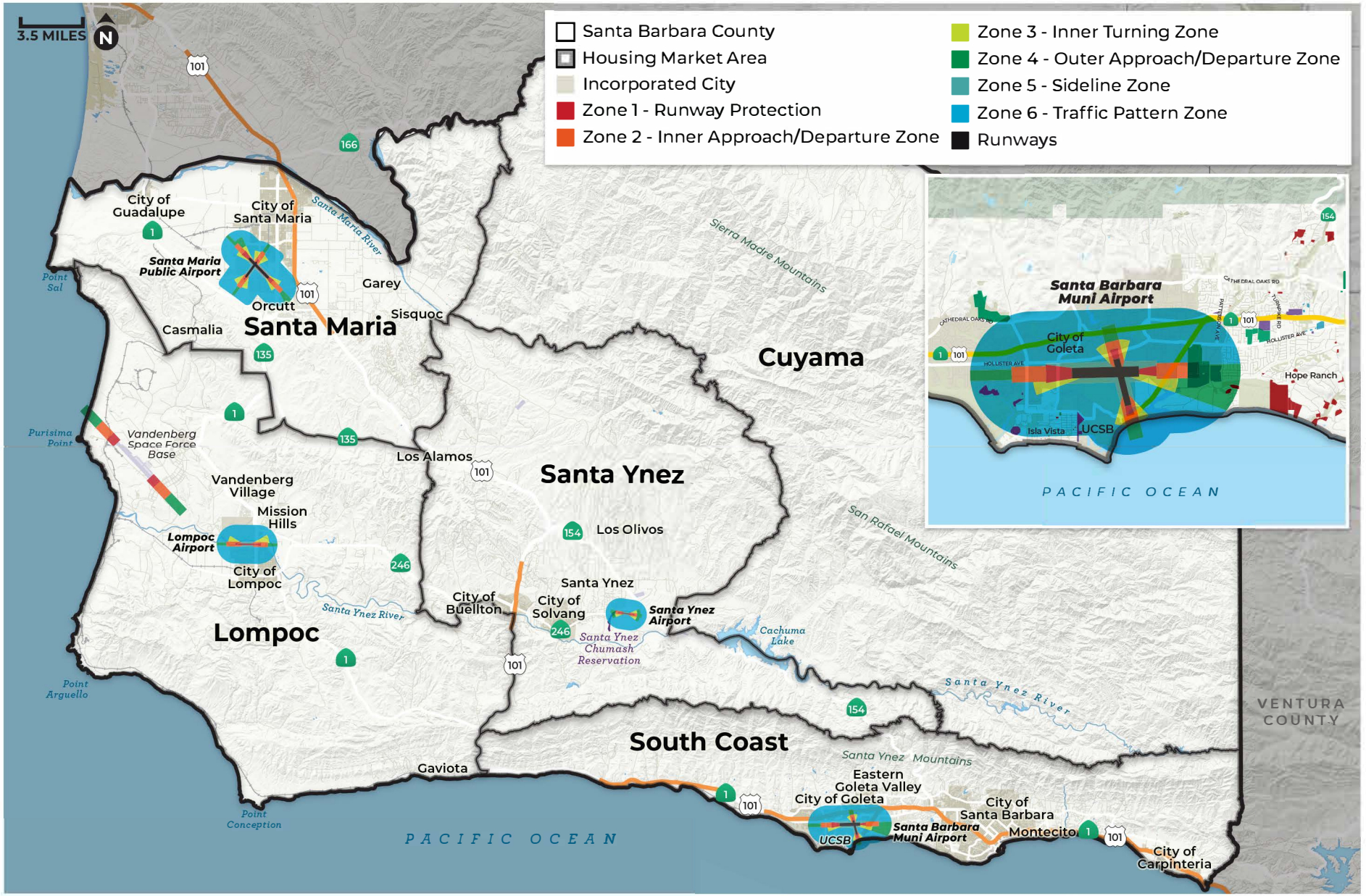
- In Safety Zone 2, existing light residential developments (less than 4 dwelling units per acre [du/ac]) and residential developments (i.e., farmworker housing, group residential, mobile home park, residential care facilities, single room occupancy, supportive housing, and transitional housing) as well as residential accessory uses are conditionally compatible with existing structures. New residential developments and residential housing are incompatible. All other forms of new residential development are incompatible in this zone. Automobile parking structures and lots and non-group recreational uses (e.g., parks, campgrounds, picnic areas) are compatible in this zone (SBCAG 2023a, 2023b, 2023c, and 2023d).
- In Safety Zone 4, low-density residential developments (less than 4 du/ac) are compatible, moderate-density residential developments and high-density residential developments up to 25 du/ac are conditionally compatible. Residential developments between 4 and 8 du/ac must reserve 10 percent of the project area for open land, and residential developments between 8 and 25 du/ac must preserve 15 percent (SBCAG 2023a, 2023b, 2023c, and 2023d).
- All forms of residential development are compatible with Safety Zone 6 (SBCAG 2023a, 2023b, 2023c, and 2023d).

In addition to density requirements, the ALUCPs established open land requirements for residential developments in each of the safety zones (SBCAG 2023a, 2023b, 2023c, and 2023d). As described in the ALUCPs, if a light aircraft is forced to land away from an airport, the risks to the people on board can best be minimized by providing as much "open land" area as possible within the airport vicinity. This concept is based on the fact that the majority of light aircraft accidents and incidents occurring away from an airport runway are controlled emergency landings in which the pilot has a reasonable opportunity to select the landing site. For business jets and other large or fast aircraft, including most military aircraft, the provision of “open land” for emergency landing purposes has minimal benefit unless the areas are very large and flat.

As described in the ALUCPs, to qualify as "open land," an area must (SBCAG 2023a, 2023b, 2023c, and 2023d):

1) Have minimum dimensions of approximately 75 feet by 300 feet (0.5 acres).
2) Consist of level (maximum 5% slope) ground with no major surface irregularities.
3) Be free of most structures and other major obstacles, such as walls, large trees or poles (greater than 4 inches in diameter, measured 4 feet above the ground), and overhead wires.

[2] Safety Zones 3 and 5 are not addressed in detail within this discussion because there are no potential rezone sites within these safety zones based on the potential housing sites enabled under the Housing Element Update.



Designated Airport Safety Zones

FIGURE 3.8-2

4) Not have buildings or other large obstacles more than 15 feet in height situated within 100 feet beyond the ends of the "open land" area. Shorter objects and ground surface irregularities are allowed. This clear airspace is intended to enhance the potential for aircraft to descend to an "open land" area.

The ALUCPs also describe that open land areas should be oriented with the typical direction of aircraft flight over the location involved.

Lastly, for safety zones where residential development is compatible with airport operations, building height limits are also a safety consideration. The ALUC criteria for determining the acceptability of a land use action with respect to height is based on the standards in the Federal Aviation Regulations (FAR), Part 77 addressing safe, efficient use, and preservation of navigable airspace as well as the U.S. Standard for Terminal Instrument Procedures (TERPS) and applicable airport design standards published by the FAA (SBCAG 2023c). For any construction or building alteration that is more than 200 feet above ground level, a project must file notice with the FAA (FAR Part 77). For projects exceeding the County's zoning height restrictions, or modifications to the height restrictions, the ALUC would determine safe height based on a calculation of the Approach Slopes (A. Orfila, SBCAG, personal communication, August 4, 2023; SBCAG 2023a, 2023b, 2023c, and 2023d).[3]

3.8.3 Regulatory Setting

Federal, state, and local regulations have been enacted to address hazards and hazardous materials in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development enabled under the Project and its associated impacts.

3.8.3.1 Federal

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act (1976) and RCRA established a USEPA-administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of. DTSC is responsible for implementing the RCRA program and California's hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency (CUPA) program, CalEPA has in turn delegated enforcement authority to the County for state law regulating hazardous waste producers or generators.

[3] An approach slope, or the slope of the approach surface, is the path that an aircraft follows on its final approach to land on a runway.

Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act

CERCLA, commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law (42 U.S. Code [USC] §103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for the liability of persons responsible for the release of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP (40 Code of Federal Regulations [CFR] Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act of 1986 was created to help communities plan for emergencies involving hazardous substances. The Act establishes requirements for federal, state, and local governments, Native American tribes, and industry regarding emergency planning and reporting on hazardous and toxic chemicals. There are four major provisions of the Emergency Planning and Community Right-to-Know Act: Emergency Planning (Sections 301 – 303); Emergency Release Notification (Section 304); Hazardous Chemical Storage Reporting (Sections 311 – 312); Toxic Chemical Release Inventory (Section 313); and the Clean Air Act Risk Management Plan Regulations (Clean Air Act Section 112[r]).

Clean Water Act/Spill Prevention, Control, and Countermeasure Rule

The Clean Water Act (CWA) (33 USC §1251 et seq., formerly the Federal Water Pollution Control Act of 1972) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. As part of the CWA, USEPA oversees and enforces the Oil Pollution Prevention regulation contained in 40 CFR Part 112, which is often referred to as the "SPCC Rule" because it requires facilities to prepare, amend, and implement spill prevention, control, and countermeasure (SPCC) plans. A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, the total aboveground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons and, because of its location, the facility could reasonably be expected to discharge oil into or upon the "navigable waters" of the U.S.

Other federal regulations overseen by USEPA relevant to hazardous materials and environmental contamination include 40 CFR Part 1(D) (Water Projects) and 40 CFR Part 1(I) (Solid Wastes). Further, 40 CFR Part 1(D)(116) sets forth a determination of the reportable quantity for each substance that has been designated as hazardous, and 40 CFR Part 1(D)(117) applies to quantities of designated substances equal to or greater than the reportable quantities that may be discharged into waters of the U.S.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration's (OSHA's) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and

education; establishing partnerships; and encouraging continual improvement in workplace safety and health. The OSHA staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation Projects. OSHA standards are listed in 29 CFR Part 1910.

Code of Federal Regulations, Part 77 – Navigable Airspace

Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. Part 77 allows the "FAA to identify potential aeronautical hazards in advance thus preventing or minimizing the adverse impacts to the safe and efficient use of navigable airspace. Navigable airspace is defined as the airspace at or above the minimum altitudes of flight that includes the airspace needed to ensure safety in the takeoff and landing of aircraft. U.S. Congress has charged the FAA with administering this airspace in the public interest as necessary to ensure the safety of aircraft and its efficient use. The ALUC criteria for determining the acceptability of a land use action with respect to height is based on these as well as the TERPS and applicable airport design standards (SBCAG 2023c). For any construction or building alteration that is more than 200 feet above ground level, a project must file notice with the FAA. For projects exceeding the County's zoning height restrictions, or modifications to the height restrictions, the ALUC would determine safe height based on a calculation of the Approach Slopes (A. Orfila, SBCAG, personal communication, August 4, 2023; SBCAG 2023a, 2023b, 2023c, and 2023d).

3.8.3.2 State

California Department of Conservation Geologic Energy Management Division

The California Department of Conservation Geologic Energy Management Division (CalGEM) is the state agency responsible for supervising the drilling, operation, maintenance, plugging, and abandonment of oil, gas, and geothermal wells. CalGEM's regulatory program promotes the sensitive development of oil, natural gas, and geothermal resources in the state through sound engineering practices, pollution prevention, and the implementation of public safety programs. CalGEM requires any construction above or near plugged or abandoned oil and gas wells to be avoided and the remediation of wells to current CalGEM standards. CalGEM developed the Construction Site Plan Review Program to assist local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures.

Among CalGEM's Construction Site Plan Program are the following development requirements:

- The developer is required to submit a fully completed Well Review Program application to CalGEM;
- The developer is required to locate all known wells located on the development site property; and
- CalGEM will evaluate all known wells located on the development site property. The evaluation process consists of: 1) verifying the wells have a competent surface plug; and 2) verifying the wells are not leaking any fluids or gas.

Hazardous Materials Transportation

The transport of hazardous materials within the state is subject to various federal, state, and local regulations. It is illegal to transport explosives or inhalation hazards on any public highway not

designated for that purpose unless the use of the highway is required to permit the delivery or the loading of such materials (California Vehicle Code, Sections 31602[b] and 32104[a]). The California Highway Patrol (CHP) designates routes to be used for the transport of hazardous materials. The transport of hazardous materials is restricted to such routes except in cases where travel from these routes is required to deliver or receive hazardous materials.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State Hazardous Waste Management Project, which is similar to but more stringent than the Federal RCRA Project. The act is implemented by regulations contained in Title 26 of the California Code of Regulations (CCR), which describe the following aspects of the requirements for the proper management of hazardous waste:

- Identification and classification;
- Generation and transportation;
- Design and permitting of recycling, treatment, storage, and disposal facilities;
- Treatment standards;
- Operation of facilities and staff training; and
- Closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from the generator to the transporter to the ultimate disposal location. Copies of the manifest must be filed with the California DTSC.

Certified Unified Program Agency (CUPA)

Senate Bill (SB) 1082, passed in 1993, created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which requires the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a CUPA. CUPAs maintain records regarding location and status of sites that use hazardous materials within their areas of jurisdiction and administer programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. The Unified Program consolidates six state environmental programs into one program at the local level, under the authority of a CUPA. The Program Elements consolidated under the Unified Program are as follows:

- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs (i.e., Tiered Permitting);
- Aboveground Petroleum Storage Tank SPCC;
- Hazardous Materials Release Response Plans and Inventory Project (i.e., Hazardous Materials Disclosure or "Community Right-to-Know");
- California Accidental Release Prevention (CalARP) Program;
- UST Program; and
- Uniform Fire Code Plans and Inventory Requirements.

The Unified Program is intended to provide relief to businesses that comply with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency (i.e., a participating agency) that implements one or more Program Elements in coordination with the CUPA.

2018 State of California Multi-Hazard Mitigation Plan

The State of California Multi-Hazard Mitigation Plan (SHMP) is the official statement of the state's hazard identification, vulnerability analysis, and hazard mitigation strategy. The goal of the SHMP is to guide implementation activities to achieve the greatest reduction of vulnerability, which results in saved lives, reduced injuries, reduced property damages, and protection for the environment. In particular, the SHMP helps administer the Local Hazard Mitigation Plan (LHMP) program for the state. The California Emergency Management Agency supports and assists local governments in the development of LHMPs and tracks the progress and effectiveness of plan updates and projects. It provides local governments with information on integrating hazard identification, risk assessment, risk management, and loss prevention into a comprehensive approach to hazard mitigation and helps them identify cost-effective mitigation measures and projects.

California Environmental Protection Agency

CalEPA was created in 1991. It unified California's environmental authority into a single cabinet-level agency and brought the California Air Resources Board, SWRCB, RWQCBs, California Department of Resources, Recycling and Recovery, DTSC, the Office of Environmental Health Hazard Assessment, and the DPR under one agency. These agencies were placed within the CalEPA "umbrella" for the protection of human health and the environment to ensure a coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substance Control

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

Government Code 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by SWRCB as having UST leaks or discharges of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material.

State Water Resources Control Board

SWRCB is responsible for statewide regulation of water resources. SWRCB's mission is to "ensure the highest reasonable quality for waters of the State of California while allocating those waters to achieve

the optimum balance of beneficial uses." SWRCB thus has joint authority over water allocation and water quality protection. SWRCB supports the efforts of the individual RWQCBs, of which there are nine statewide. These are semiautonomous and consist of Board members appointed by the Governor and confirmed by the Senate. Regional boundaries are based on watersheds, and water quality requirements are based on the unique differences in climate, topography, geology, and hydrology for each watershed.

Each RWQCB makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement actions. Water quality standards are defined in each RWQCB's respective Basin Plan. Basin plans must conform to the policies set forth in the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) and established by SWRCB in its state water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The RWQCBs are also authorized to enforce discharge limitations, take actions to prevent violations of these limitations from occurring, and conduct investigations to determine the status of quality of any of the waters of the State of California within their region. Civil and criminal penalties are also applicable to persons who violate the requirements of the Porter-Cologne Act or SWRCB/RWQCB orders.

California Porter-Cologne Water Quality Control Act

The Federal CWA places the primary responsibility for the control of water pollution and for planning the development and use of water resources with the individual states, although it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Act, which grants the SWRCB and RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require the cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

California Office of Emergency Services (CalOES)

To protect public health and safety as well as the environment, the CalOES is responsible for establishing and managing statewide standards for business and area plans related to the handling and release, or threatened release, of hazardous materials. CalOES requires basic information regarding hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and health risks) to be available to firefighters, public safety officers, and regulatory agencies. Typically, this information should be included in business plans to prevent or mitigate impacts on the environment or the health and safety of individuals from the release or threatened release of these materials into the workplace and environment. These regulations are covered under Chapter 6.95 of the California Health and Safety Code, Article 1, Hazardous Materials Release Response and Inventory Project (Sections 25500 to 25520), and Article 2, Hazardous Materials Management (Sections 25531 to 25543.3).

Title 19 of the CCR (Public Safety; Division 2; Office of Emergency Services; Chapter 4; Hazardous Material Release Reporting, Inventory, and Response Plans; Article 4 [Minimum Standards for Business Plans]) establishes minimum statewide standards for hazardous materials business plans. These plans must include the following: a hazardous material inventory, in accordance with Sections 2729.2 to 2729.7; emergency response plans and procedures, in accordance with Section 2731; and training Project information, in accordance with Section 2732. Business plans should contain basic information regarding the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state. Each business will prepare a hazardous materials business plan if that business uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following:

- 500 pounds of a solid substance;
- 55 gallons of a liquid;
- 200 cubic feet of compressed gas;
- A hazardous compressed gas in any amount; and
- Hazardous waste in any quantity.

California Occupational Safety and Health Administration (Cal/OSHA)

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency with responsibility for worker safety with respect to the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337–340). The regulations specify requirements regarding employee training, the availability of safety equipment, accident-prevention Projects, and hazardous substance exposure warnings.

Asbestos-Containing Materials Regulations

State-level agencies, in conjunction with USEPA and the Cal/OSHA, regulate removal, abatement, and transport procedures for asbestos-containing materials. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations, and medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk of asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Polychlorinated Biphenyls

The USEPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority of new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act (15 USC §2601 et seq.). Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and highly specific safety procedures for their disposal. The state likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these

regulations require that such materials be treated, transported, and disposed of accordingly. At lower concentrations for non-liquids, RWQCBs may exercise discretion over the classification of such wastes.

Lead-Based Paint

Cal/OSHA's Lead in Construction Standard is contained in 8 CCR Section 1532.1. The regulations address all of the following areas: permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

California Highway Patrol

Under the California Vehicle Code, Section 32000.5, a valid license to transport hazardous materials, issued by the CHP, is required for the transport of either of the following.

- Hazardous materials for which the display of placards is required pursuant to Section 27903.
- Hazardous materials weighing more than 500 pounds for which the display of placards is required.

Additional requirements regarding the transport of explosives, inhalation hazards, and radioactive materials are enforced by the CHP under the authority of the California Vehicle Code. The transport of explosives generally requires consistency with rules and regulations pertaining to routing, safe stopping distances, and inspection stops (14 CCR Sections 6[1][1150–1152.10]). Inhalation hazards face similar but more restrictive rules and regulations (13 CCR Sections 6[2.5][1157–1157.8]). The transport of radioactive materials is restricted to specific safe routes.

Irrigated Lands Regulatory Program (ILRP)

The ILRP addresses waste discharge (e.g., sediments, pesticides, nitrates) from commercial irrigated lands, including nurseries, which are required to obtain regulatory coverage. Coverage is not required if a property is not used for commercial purposes, is not irrigated (dryland farmed), or if commercial irrigated lands are covered under another program (i.e., Dairy, Poultry, or Bovine). Options for regulatory coverage include joining a Third-Party (coalition) group or obtaining Individual Regulatory Coverage. The goal of ILRP is to reduce impacts of agricultural discharges to groundwater and surface water. Under this program, growers must implement management practices and submit farm evaluations and nitrogen management data.

California Airport Land Use Planning Handbook

In October 2011, the Caltrans Division of Aeronautics approved the current California Airport Land Use Planning Handbook. The California Airport Land Use Planning Handbook is not a regulatory program or policy document. Rather, the purpose of the Handbook is to provide guidance for conducting airport land use compatibility planning as required by the Public Utilities Code, Article 3.5, Airport Land Use Commissions. Article 3.5 outlines the statutory requirements for ALUCs including the preparation of an ALUCP. Article 3.5 mandates that the Division of Aeronautics create a Handbook that contains the identification of essential elements for the preparation of an ALUCP. This Handbook is intended to: 1) provide information to ALUCs, their staffs, airport proprietors, cities, counties,

consultants, and the public; 2) to identify the requirements and procedures for preparing effective compatibility planning documents; and 3) define exemptions where applicable.

3.8.3.3 Local

Santa Barbara County Association of Governments (SBCAG) / Airport Land Use Commission (ALUC)

The SBCAG ALUC is responsible for the protection of public health, safety, and welfare with respect to lands within the vicinity of airports within the county. To aid in the implementation of these responsibilities and as mandated by state law, SBCAG prepares and implements ALUCPs for the active airports within the county, as well as VSFB. Each ALUCP establishes a set of land use planning standards that local agencies should incorporate into planning and zoning efforts within the AIA.

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan addresses public safety, hazardous materials, and fire hazards for the county. Consistency with these policies is discussed in Section 3.10, *Land Use and Planning,* and Section 3.16, *Wildfire*.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979, republished in May 2009, and amended in July 2023) is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards. The Element provides information concerning geology, soils, seismicity, and fire and flood hazards of Santa Barbara County, and provides recommendations and criteria to aid in land use planning to ensure that future development will be compatible with the environment. New policies were adopted in the Seismic Safety and Safety Element of the Comprehensive Plan in July 2023.

Safety Element Supplement

The Safety Element Supplement was adopted in 2000 and republished in May 2009. Divided into two parts, Part A focuses on the role of land use planning in reducing the risk of public exposure to acutely hazardous materials. It draws upon the County's own experiences and recommended practices of other informed sources to guide consistent and well-informed land-use decisions with regard to public safety. Chapter I addresses facilities that handle acutely hazardous materials and are fixed in location to a single site; and Chapter II addresses gas pipelines, which are considered to be fixed in location to a corridor and, thus, represent a linear source of risk, which extends along the corridor.

The objectives and policies contained in these chapters address the following two goals:

- **Goal 1:** To provide sufficient guidance to affect well-informed, consistent, and equitable land use decisions.
- **Goal 2:** To prevent and minimize unnecessary risk to the public, recognizing it is impossible to obtain a zero-risk society.
- **Policy Hazardous Facility Safety 1-A: Risk Estimates.** The County shall employ accurate estimates of risk associated with hazardous facilities to inform discretionary land use decisions.

Where substantial, preliminary evidence indicates involuntary public exposure to significant risk may result from the land use decision.

Hazardous Waste Element

The Hazardous Waste Element was adopted in 1990 and republished in May 2009, which emphasizes the need for proper management of current and future hazardous wastes to minimize the amount of waste generated and reduce the hazard of what is generated. The County Hazardous Waste Management Plan is concerned primarily with hazardous waste issues and not hazardous materials issues. Hazardous wastes are substances of no further intended use, which need treatment or disposal, or both, while hazardous materials include new and usable substances. The handling and use of hazardous materials are regulated by a set of legislative and regulatory requirements that fall outside the scope of the Comprehensive Plan. The following goals and policies are relevant to the proposed Project:

Storage of Hazardous Waste

- **Goal 1:** To protect public health and safety and the environment from risks posed by improper storage of hazardous materials and hazardous waste.
- **Policy 1:** The County and cities shall encourage the proper storage of hazardous materials and hazardous waste through continued inspection efforts and public education regarding proper storage methods and regulations.

Contaminated Sites

- **Goal 1:** To protect public health and safety and the environment from risks due to the presence of abandoned or contaminated sites.
- **Policy 1:** The County and cities should work with other involved agencies to establish a coordinated interagency effort for the identification, regulation, mitigation, and notification of contaminated sites.
- **Policy 2:** The County and cities in conjunction with the State Department of Health Services shall encourage onsite treatment and remediation to reduce the transport of hazardous waste from contaminated sites.

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP)

The MJHMP was most recently updated in 2022 to comprehensively identify, evaluate, and mitigate the known hazards that Santa Barbara County faces. The MJHMP is used by local emergency management teams, decision-makers, and agency staff to implement needed mitigation to address known hazards. The MJHMP can also be used as a tool for all stakeholders to increase community awareness of local hazards and risks and provide information about options and resources available to reduce those risks. The MJHMP describes historical hazard events and the future probability of these hazards and their impact on communities within the county. Vulnerability assessments summarize the impacts of hazards on critical infrastructure, populations, and future development. The MJHMP identifies five goals and a Mitigation Plan, including measures to ensure future development is resilient to known hazards (County of Santa Barbara 2022).

Santa Barbara County Fire Department, Hazardous Waste Unit

The Santa Barbara County Fire Department (SBCFD) is certified by CalEPA as the CUPA for the County. The CUPA regulates businesses that handle hazardous materials, generate or treat hazardous waste, or operate aboveground or underground storage tanks. CUPA requirements can be found in Health & Safety Code Chapter 6.11 and CCR, Title 27, Division 1, Subdivision 4, Chapter 1. CUPA is responsible for administering and managing the Hazardous Materials Release Response Plans and Inventory Project, USTs, Hazardous Waste Generators, Onsite Hazardous Waste Treatment, Aboveground Petroleum Storage Act, and CalARP.

Santa Barbara County's Site Mitigation Program

The Site Mitigation Unit is administered by the Santa Barbara County Environmental Health Services and provides regulatory oversight for site assessment and corrective actions at properties where hazardous substance releases have occurred that are not associated with a LUST system. The primary goal of the Site Mitigation Unit is to protect human health and natural resources by ensuring appropriate steps are taken to mitigate and clean up land and water contaminated with hazardous materials. Site Mitigation cases include releases of crude oil, other hazardous substances, and toxic heavy metals, oilfield restoration, properties contaminated by former industrial/commercial uses, and sites with historically contaminated fill.

Santa Barbara County Special Problem Areas

The County Code of Ordinances Section 10-15.2 states that "Special Problems Areas" are areas of the County designated by resolution of the Board of Supervisors as having existing or anticipated special and unique problems pertaining to flooding, drainage, soils, geology, access, sewage disposal, water supply, location, or an elevation which impact the health, safety, and welfare of the public. The following locations are designated as special problem areas:

- South County: Hollister Avenue at Modoc Road, Mission Canyon, Naples, Shepard Mesa, Summerland
- North County: Ballard, Janin Acres, Los Alamos, Los Olivos, Sweeney Road.

The "Special Problems Committee" is a committee composed of representatives of the following departments or divisions: planning and development, environmental health, fire, and public works.

Section 10-15.3 states the special problems committee shall review plans and specifications of buildings and structures (including the components of wastewater disposal systems) proposed for construction in a special problems area. Individual members of the committee may recommend to the county decision-makers any reasonable conditions of approval considered necessary to mitigate present or anticipated problems within the scope of the committee's charge or to prevent damage to public or private property, risk of injury to persons, or creation of a public nuisance. Where an individual member or members are unable to identify feasible mitigation of such problems, damage, or risk, each may recommend denial of the permit that would authorize the construction of the proposed buildings or structures.

Community and Regional Plans

As discussed in Section 3.10, *Land Use and Planning*, projects within the vicinity of the following community and regional plans would be subject to hazardous materials goals and policies of that plan:

- Eastern Goleta Valley Community Plan
- Gaviota Coast Plan
- Goleta Community Plan
- Los Alamos Community Plan
- Mission Canyon Plan
- Montecito Community Plan
- Orcutt Community Plan
- Santa Ynez Community Plan
- Summerland Community Plan
- Toro Canyon Plan
- Montecito Community Plan
- Summerland Community Plan

3.8.4 Environmental Impact Analysis

This section discusses the potential hazards and hazardous materials impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.8.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to hazards and hazardous materials if it would:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the project area.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Non-applicable thresholds:

- Threshold (f) (*Evacuation routes and emergency response plans*): Potential hazards associated with interfering with evacuation routes and emergency response plans are discussed in Section 3.16, *Wildfire.* Therefore, this issue is not discussed in this section.

- Threshold (g) (*Wildfire*): Potential hazards associated with wildland fires and fire hazards are discussed in Section 3.16, *Wildfire.* Therefore, this issue is not discussed in this section.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2021) includes thresholds for public safety, as summarized and presented below, that are relevant in determining project impacts related to hazards.

Public Safety

Impacts from risks stemming from the following facilities and activities would be significant if (a) they are subject to a discretionary land-use action (or would communicate their concerns for public safety to another jurisdiction that is making a discretionary decision, such as routes for shipping hazardous materials), and (b) initial analysis reveals substantial evidence to support a fair argument that the potential of a significant impact to public safety could result from approval of the project subject to such action:

1. Oil wells and gas wells (unless abandoned or undergoing abandonment), and associated production.
2. Gas and hazardous liquids pipelines, including oil if a significant risk is expected, but exempting existing natural gas pipelines owned by a Californian public utility regulated by the California Public Utilities Commission and operated for the purpose of delivering gas directly to the Goleta storage field or consumers (except activities related to liquefied natural gas), and exempting new low-pressure distribution pipelines (125 pounds per square in gauge or lower) operated by a Californian public utility and regulated by the California Public Utilities Commission.
3. Oil and/or gas processing and storage facilities, including facilities for removing sulfur, removing gas liquids, and compressing gas.
4. Oil refineries.
5. Handling, storage, and transport of compressed natural gas or methanol related to facilities for refueling motor vehicles with these materials.
6. All handling, storage, and transport of chlorine in containers with a capacity of one ton or more, or an equivalent amount of chlorine in bottles or cylinders connected through a common header.
7. Handling, storage, and transport of anhydrous ammonia in containers with a capacity of one ton or more, or an equivalent amount of anhydrous ammonia in bottles or cylinders connected through a common header.
8. Handling, storage, and transport of acutely hazardous rocket propellants such as nitrogen tetroxide (including instances where the County would communicate with other jurisdictions about discretionary actions that affect public safety in this County such as designation of routes for transporting hazardous materials).
9. Handling, storage, and transport of spent radioactive fuel and other high-level, radioactive materials (including instances where the County would communicate with other jurisdictions about discretionary actions that affect public safety in this County such as the designation of route for transporting hazardous materials).

10. Storage of natural gas liquids, including liquefied petroleum gas, unless such storage is limited to a single container with a maximum capacity of 10,000 gallons or less and does not require refilling more than once weekly.
11. Facilities of a type not addressed in 1-10 above, and not exclusively dedicated to retail distribution of consumer products (such as gasoline stations, or hardware, paint, and dry-cleaning stores) that: (a) use a classified Class A or B explosive (per Title 49, CFR, 171-179); or (b) use substances classified as high-level radioactive materials; or (c) use specified quantities of regulated substances (pursuant to Title 19 of the CCR, Division 2, Chapter 4.5) and meet all of the following criteria.
    a. The regulated substance(s) is stored as a compressed gas or liquefied compressed gas, or is expected to vaporize or evaporate quickly upon release (e.g., through failure of container, piping, or valve), or is stored as a liquid at a temperature that exceeds its boiling point.
    b. The regulated substance(s) has the potential to cause a significant risk to public safety according to the County's environmental thresholds. (For example, the regulated substance(s) exists as a gas or vapor upon accident release, and will either release into the open atmosphere or become dangerously explosive in a confined environment.)
    c. The regulated substance(s) is associated with a specific activity that is generally considered to be incompatible with surrounding land uses.
12. All development proposed in proximity to one or more existing hazardous facilities as described above, unless (a) the hazardous facility(ies) are inoperative for the purpose of abandonment, or (b) the proposed development is a single-family residential unit which the County considers to be a voluntary exposure to the hazardous facility, or (c) the proposed development does not require a discretionary land-use action.

In cases 1 through 11 listed above, these thresholds apply to risks imposed on present and reasonably projected future land use, considering principally permitted uses under current zoning along with any conditional uses that are permitted or under review.

With regard to land uses with transitory populations (e.g., parks, roads, pedestrian and bike paths), these thresholds apply only when these populations are considered to be often present or too often flow continuously (e.g., a frequently used recreational park or frequently traveled road). They do not apply when transitory populations are considered to be sporadic or often absent (e.g., hiking trails and other uses where the infrequent presence of people renders inclusion herein as overly speculative).

These thresholds do not apply to occupational safety (i.e., employees of the hazardous facility or people who visit the hazardous facility to provide services or conduct business).

In addition, impacts would be significant if a risk analysis conducted for a project results in a societal risk spectrum that falls in the amber or red zones of the public fatality or public injury risk spectrums as presented in Figures 1 and 2 of the Public Safety Thresholds section of the County's *Environmental Thresholds and Guidelines Manual* (2021).

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not

known. As a result, the impact analysis provided below does not evaluate potential impacts on cultural or tribal cultural resources at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for lower- and moderate-income units. This programmatic analysis reviews potential impacts anticipated to be enabled under the Housing Element Update and considers whether these changes would directly or indirectly introduce new hazards or increased exposure to risks within the county.

The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This programmatic analysis is supported by the review of existing adopted plans, including the 2022 MJHMP, and public databases, including SWRCB's GeoTracker Database, DTSC's EnviroStor Database, and USEPA's RCRA hazardous waste generators. Additionally, this section integrates relevant information from the 2021 Connected 2050: Regional Transportation Plan and Sustainable Communities Strategy EIR, the 2017 Cannabis Land Use Ordinance and Licensing Program EIR, the 2016 Gaviota Coast Plan EIR, the 2015 Eastern Goleta Valley Community Plan EIR, and the 2014 Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments EIR.

3.8.4.2 Project Impacts

Table 3.8-4 provides a summary of the impacts related to hazards and hazardous materials related to the proposed Project. A detailed discussion of each impact follows.

Table 3.8-4. Summary of Hazards and Hazardous Materials Impacts

Hazards and Hazardous Materials Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact HAZ-1. The proposed Project could involve the routine transport, use, or disposal of hazardous materials that could create a significant hazard to the public or result in the release of hazardous materials into the environment.	Insignificant	None required	Insignificant impacts
Impact HAZ-2. The proposed Project could occur on hazardous sites or otherwise result in foreseeable upset involving the disturbance of existing soil or groundwater contamination.	Potentially significant	MM HAZ-1 (Environmental Site Assessment) MM HAZ-2 (Incidental Discovery of Contamination)	Significant but mitigable impacts
Impact HAZ-3. The proposed Project could result in potentially significant impacts from former oil or gas pipelines or well facilities.	Potentially significant	MM HAZ-1 (Environmental Site Assessment) MM HAZ-2 (Incidental Discovery of Contamination)	Significant but mitigable impacts

Table 3.8-4. Summary of Hazards and Hazardous Materials Impacts (Continued)

Hazards and Hazardous Materials Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact HAZ-4. The proposed Project would result in residential development within the Santa Maria Airport, Santa Ynez Airport, Lompoc Airport, Santa Barbara Municipal Airport, and VSFB Land Use Plan areas, presenting potential safety hazards to people residing or working in the area.	Potentially Significant	MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)	Significant but mitigable impacts
Cumulative Impacts	Insignificant	None required	Insignificant

Impact HAZ-1. The proposed Project could involve the routine transport, use, or disposal of hazardous materials that could create a significant hazard to the public or result in the release of hazardous materials into the environment.

While the proposed Project does not include the approval of site-specific development, the Housing Element Update would facilitate future mixed use and residential development that would likely involve the routine transport, use, and/or disposal of hazardous materials. Demolition and construction activities associated with future residential development would involve the use of common hazardous materials, including petroleum products, solvents, paints, and other regulated materials. The transport of these hazardous materials would continue to be subject to various federal, state, and local regulations including California Vehicle Code Section 31602(b) and 32104(a). As described in Section 3.8.3, *Regulatory Setting*, CHP designates routes to be used for the transport of hazardous materials. Similarly, the use, storage, and disposal of these hazardous materials would continue to be regulated pursuant to the Hazardous Waste Control Act (Title 26 of the CCR) by DTSC and SBCFD, the agency certified by CalEPA as the CUPA for the County.

Following the completion of construction, residential uses do not generally involve the transport, use, disposal, or potential release of hazardous materials that could pose a significant hazard to the public, nearby sensitive uses such as schools, or the environment. New residential and mixed use development enabled under the Housing Element Update would generally involve the use of household cleaners and solvents, which would not be used in large quantities that could generate a significant hazard and are managed through existing municipal solid waste disposal and recycling programs in the county (Section 3.15, *Utilities and Water Supply.*) While potential future mixed use and residential development enabled under the Housing Element Update would likely involve the routine transport, use, and/or disposal of hazardous materials, existing federal, state, and local regulations would minimize the risk of upset or release; therefore, impacts would be *insignificant*.

Impact HAZ-2. The proposed Project could occur on sites included on a list of hazardous materials sites and create significant hazard to the public or environment, or otherwise result in foreseeable upset involving the disturbance of existing soil or groundwater contamination.

The proposed Project would enable potential future residential and mixed use development of lands that have either known or the potential for unknown soil or groundwater contamination that could

result in hazardous material upset. Disturbance of contaminated surface soils or groundwater or the release of hazardous building materials via construction and/or demolition as well as operation of future sites could subject workers, neighboring land uses, and future residents to hazardous substances. The potential for exposure to contaminated sites differs countywide, as described below.

As described in Section 3.8.2.1, *Hazardous Sites*, there are 184 open sites within the unincorporated areas that are tracked in the DTSC's EnviroStor database and the SWRCB's GeoTracker database (Table 3.8-1 and Figure 3.8-1). As such, future housing development could feasibly occur on properties that have been documented with prior releases of hazardous materials or wastes (e.g., sites included on the DTSC Cortese List pursuant to Government Code 65962.5). For example, Rezone Site No. 17 (Montessori) overlaps with an open cleanup program site in Eastern Goleta Valley within the South Coast HMA. A limited Phase II Environmental Site Assessment (ESA) was conducted at this property in 2008, which identified residual pesticide compounds likely originating from previous use as an orchard from 1928 through 1989 or for row crops since 1994. Additional investigations occurred in 2015 and a work plan has been developed for further sampling, which is being reviewed by Santa Barbara County Environmental Health Services as of the last regulatory correspondence in June 2023 (T. Rejzek, Santa Barbara County Public Health Department, email correspondence, April 12, 2023). No other open sites are known to overlap with potential housing sites in the sites inventory prepared for the Housing Element Update.

However, previously closed hazardous sites may still contain residual contamination that may affect future residential development. For example, Rezone Site No. 23 (Key Site 16) overlaps with a hazardous site associated with the Former Orcutt Pump Station at 201 South Marcum Street in Orcutt within the Santa Maria HMA. Previous petroleum hydrocarbon soil contamination associated with a former aboveground storage tank on this property was removed by excavation and disposed of. Residential concentrations of soil contamination meet levels that are consistent with unrestricted land use. However, adherence to the soils management plan for the site (Chevron Environmental Management Company 2020) is a required condition of closure due to small amounts of petroleum hydrocarbon impacted soil left in place due to structural development along the western and eastern property boundary. As such, any future residential development within this property would require compliance with existing land use controls or potentially the implementation of additional remediation measures prior to ground-disturbing activities. In addition, Rezone Site No. 23 (Key Site 16), a small number of pending projects, and some vacant sites overlap with previously closed hazardous sites that may also have residual contamination and existing land use controls (e.g., soil management plans).

It should also be noted that due to prior land uses, potential housing sites that are not and were never listed as hazardous sites may have previously undiscovered soil or groundwater contamination, particularly agricultural sites. As previously described, potentially hazardous materials that currently occur throughout the county are commonly found in urban and agricultural areas and generally include cleaning and metal solvents, pesticides/herbicides, paints, oils, and lubricants. Therefore, future residential development would have the potential to expose these hazardous materials during construction activities (e.g., excavation, grading, etc.). Similarly, demolition or redevelopment of existing structures developed before the 1980s could result in the release of asbestos or lead-based paint.

There are a variety of existing regulatory processes, including Comprehensive Plan Seismic Safety and Safety Element and Hazardous Waste Element policies, the County Code, the Hazardous Waste Control Act and CCR, and the CFR, that would serve to minimize these potential impacts of future development

enabled under the Housing Element Update. Through the review for hazardous material contamination in soil, soil vapor, or groundwater and an assessment for hazardous building materials, the County would assess and require avoidance of disturbance during construction. Without site-specific assessment, contamination could be released into the environment or, upon future occupation, cause a hazard to the public due to exposure to hazardous materials above the applicable regulatory exposure limits. Existing federal, state, and local regulations (Section 3.8.3, *Regulatory Setting*) as well as site-specific remediation plans and requirements mandated by existing regulations (e.g., CalGEM, Unified Program) and enforced by regulatory agencies and CUPAs, address remediation requirements following the discovery of contamination; however, all the potential housing sites identified in the sites inventory have not been investigated for the presence or absence of hazardous materials under the proposed Project. Therefore, under **MM HAZ-1 (Environmental Site Assessment),** the County would require the preparation of a project-specific Phase I ESA for any vacant, commercial, agricultural, or industrial site. The Phase I ESA would be prepared in accordance with the American Society for Testing and Materials (ASTM) Standard Practice E 1527-13 or the Standards and Practices for All Appropriate Inquiry (AAI), prior to any demolition or construction activities. The Phase I ESA would identify specific Recognized Environmental Conditions (RECs), which may require further sampling by a qualified hazardous materials Environmental Professional with Phase II ESA / site characterization experience. If the Phase II ESA reveals RECs, the Environmental Professional would be responsible for identifying remedial activities, which would be strictly controlled by federal, state, and local regulations (Section 3.8.3, *Regulatory Setting*). If unknown wastes or suspect materials are discovered during construction activities, **MM HAZ-2 (Inadvertent Discovery of Contamination)** would address notification and remediation requirements in compliance with all federal, state, and local regulations (Section 3.8.3, *Regulatory Setting*). **MM HAZ-2** would require that all construction activities cease near the contamination until an investigation is conducted and a soil management plan and/or remediation plan is prepared. With the implementation of **MM HAZ-1** and **MM HAZ-2** impacts would be *significant but mitigable*.

Impact HAZ-3. The proposed Project could result in potentially significant impacts from former oil or gas pipelines or well facilities.

As described in Section 3.8.2.4, *Oil Extraction Areas*, former well facilities and oil and gas pipelines can be found throughout the county. For example, in the Santa Maria Valley, there are several oil and gas pipelines with major lines along Bradley Road and California Boulevard. Some of these lines are idle (not permanently abandoned) and have the potential to carry toxic H_2S. These lines extend south through the foothills and are tied into the Cat Canyon Oil Field and the Orcutt Hill Oil Field, which abuts Rezone Site No. 21 (Key Site 10) (County of Santa Barbara 1997). High-pressure gas lines exist along California Road and Solomon Road, as well as along portions of Blosser Road, Clark Avenue, and SR 1. Sections of these lines extend through Rezone Site No. 23 (Key Site 16) and several vacant sites. Rezone Site Nos. 20 (Key Site 3) and 23 (Key Site 16) also had historic oil activities (County of Santa Barbara 1997).

Ground disturbance associated with potential future residential and mixed use development enabled under the Housing Element Update could encounter these facilities and expose contaminated soils during construction activities (e.g., excavation, grading, etc.). Some of these former well facilities and oil and gas pipelines have been previously identified as hazardous sites. For example, as described in Impact HAZ-2, Rezone Site No. 23 (Key Site 16) overlaps with a hazardous site associated with the Former Orcutt Pump Station. Soil contamination at this site has been remediated; however, existing land use controls in the form of a soils management plan, remain in place. Other facilities have not

necessarily been identified as hazardous sites and are not tracked in the DTSC's EnviroStor database and the SWRCB's GeoTracker database. Nevertheless, hydrocarbon and petrochemical contaminants associated with past drilling activities (especially during the first part of the century when most people were unaware of the hazards of petroleum fuels) may still exist. Soil contamination could have resulted from old wells, flowlines, pipelines, tanks, and sumps. For example, during the 1930s and 1940s, used drilling fluid was collected in sumps, which were usually unlined, excavated dirt ditches, as opposed to the open tanks or lined sumps that are used today. The cleanup practices in the first part of the century were minimal; a typical closure practice for a sump was to merely cover the sump over with topsoil (County of Santa Barabara 1997).

Potential future residential and mixed use development enabled under the proposed Project could occur in areas that have been previously utilized for oil exploration and drilling, thereby exposing additional persons to hazards associated with abandoned oil wells and other anomalies. The areas of greatest concern are located in Orcutt, where substantial oil drilling occurred in the past and continues today. There are a large number of abandoned oil wells, not all of which have been accurately mapped. Where well sites are known, additional difficulty exists in precisely locating abandoned pipelines, site dumping, and other hazardous anomalies related to the production of oil. Known oil facilities are located on Rezone Site No. 20 (Key Site 3) including a plugged and abandoned dry hole on the southern parcel boundary line. Similarly, Rezone Site No. 23 (Key Site 23) includes a Union Oil Company of California (Unocal) oil storage facility consisting of three large oil sumps (visible in 1956 aerial photographs). Old sumps requiring extensive remediation are likely to be uncovered during grading or construction in the Orcutt Community Planning Area (County of Santa Barbara 1997).

As described in Impact HAZ-2, the implementation of **MM HAZ-1 (Environmental Site Assessment)** would require the preparation of a project-specific Phase I ESA for any vacant, commercial, agricultural, or industrial site. The Phase I ESA would identify specific RECs, which could include previous oil and gas activities, that may require further sampling by a qualified hazardous materials Environmental Professional with Phase II ESA / site characterization experience. If the Phase II ESA reveals RECs, the Environmental Professional would be responsible for identifying remedial activities, which would be strictly controlled by federal, state, and local (Section 3.8.3, *Regulatory Setting*). If former well facilities and/or oil and gas pipelines are identified, compliance with the procedures and regulations of CalGEM developed pursuant to PRC Section 3208.1 would be required (Section 3.8.3, *Regulatory Setting*). To ensure compliance with these requirements, CalGEM developed the Construction Site Plan Review Program. This program assists local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures (CalGEM 2023). Requirements of the program include, but are not limited to:

- Identification and confirmation of the location(s) of the former well facility(ies);
- Review of the abandonment status (e.g., by examining past plugging operations, and then comparing the abandonment status with current abandonment standards);
- Evaluation in the field to ensure that the former well facility(ies) is not leaking any fluids or gas;
- Restoration following evaluation, including removal of all associated equipment, junk, and debris and any excavation needs to be filled with earth, compacted properly to prevent settling, and graded over. (Pursuant to CCR Section 1776, well site restoration must be completed within 60 days following the evaluation of a well.)

The Construction Site Plan Review Program concludes with the issuance of a Well Review Letter to the local permitting agency (i.e., the County), which will list the current status of all known oil and gas well facilities located on the property. It also will provide other important information associated with development near oil or gas wells (e.g., avoiding building over or in close proximity to the well and implementing surface mitigation measures[4] that are determined necessary by CalGEM).

Implementation of **MM HAZ-2 (Inadvertent Discovery of Contamination)** would require that in the event that that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site, construction activities in the immediate vicinity of the contamination shall cease immediately. Following discovery, this measure would require a qualified environmental specialist conduct an investigation to identify risks and describe measures to be taken to protect workers and the public from exposure to potential site hazards.

With the implementation of **MM HAZ-1 (Environmental Site Assessment)** and **MM HAZ-2 (Inadvertent Discovery of Contamination)**, as well as required compliance with the CalGEM Construction Site Plan Review Program, impacts would be *significant but mitigable*.

Impact HAZ-4. The proposed Project would result in residential development within the Santa Maria Airport, Santa Ynez Airport, Lompoc Airport, Santa Barbara Municipal Airport, and VSFB Land Use Plan areas, presenting potential safety hazards to people residing or working in the area.

Airport safety is primarily related to the potential for accidents related to aircraft operations, such as emergency landings or in rare cases crashes, excessive noise levels caused by frequent aircraft flyover, and ensuring that land use development is carried out in a manner that minimizes risks associated with aircraft hazards. Issues related to aircraft noise and land use compatibility are discussed in Section 3.9, *Noise,* and Section 3.10, *Land Use and Planning*, respectively. Minimizing or avoiding risks to properties within an AIA or ALUCP safety zones involves the designation of areas around the ends of runways that must be free of objects or sensitive land uses, limiting certain densities of development within certain zones, and understanding historical accident patterns (Section 3.8.2.6, *Airport Safety Zones*).

The housing sites inventory provided as part of the Housing Element Update indicate where future residential and mixed use development may occur under the proposed Project. Based on GIS analysis of the potential housing sites in the sites inventory relative to the safety zones mapped by SBCAG in the ALUCPs, it is estimated that up to 427.96 acres of potential residential uses would be zoned within a safety zone and subject to the applicable density and open land requirements of the ALUCPs. Of the total acreage in the safety zones, 218.62 (51 percent) is located within the South Coast and largely associated with Rezone Site Nos. 1 (Giorgi), 2 (St. Athanasius), 3 (Scott), 4 (Ekwill), and 5-7 (Caird 1-3) in the South Patterson Agricultural Area. The remaining 209.34 acres (49 percent) are located within North County, approximately 171.18 acres of which are associated with Santa Maria Airport. Table 3.8-5 summarizes the overlap between the ALUCP safety zones and the housing sites identified in the Housing Element Update.

[4] Surface mitigation measures may include installation of venting systems for wells, venting systems for parking lots, patios, and other hardscape, methane barriers for building foundations, methane detection systems, and collection cellars for well fluids by a licensed Professional Engineer.

Table 3.8-5. Summary of Potential Housing Sites in the ALUCP Safety Zones (Acres)

Housing Site Type by ALUCP Safety Zone	South Coast (SBA)	North County			
		Lompoc Valley (LPC)	Santa Maria Valley (SMX)	Santa Ynez Valley (IZA)	Cuyama Valley (L88)
Total Acres of Housing Sites Inventory Affected by the ALUCP Safety Zones					
Existing Vacant Sites	**10.49**	**19.92**	**79.89**	**4.33**	**--**
Safety Zone 2	*--*	*--*	*0.62*	*--*	*--*
Safety Zone 4	*8.91*	*--*	*18.36*	*0.18*	*--*
Safety Zone 6	*1.58*	*19.92*	*60.91*	*4.15*	*--*
Rezones	**208.13**	**--**	**99.30**	**5.91**	**--**
Safety Zone 2	*37.79*	*--*	*11.32*	*--*	*--*
Safety Zone 4	*104.17*	*--*	*56.28*	*--*	*--*
Safety Zone 6	*66.17*	*--*	*31.70*	*5.91*	*--*
County-owned Sites	**--**	**--**	**--**	**--**	**--**
Pending Projects	**--**	**--**	**--**	**--**	**--**
Total by HMA	**218.62**	**19.92**	**179.18**	**10.24**	**--**
Safety Zone 2	*37.79*	*--*	*11.94*	*--*	*--*
Safety Zone 4	*113.08*	*--*	*74.63*	*0.18*	*--*
Safety Zone 6	*67.75*	*19.92*	*92.61*	*10.06*	*--*
Total by RHNA Region	**218.62**	**209.34**			
Safety Zone 2	*37.79*	*11.94*			
Safety Zone 4	*113.08*	*74.82*			
Safety Zone 6	*67.75*	*122.58*			
Total Unincorporated County	**427.96**				
Safety Zone 2	*49.73*				
Safety Zone 4	*187.90*				
Safety Zone 6	*190.33*				

Source: SBCAG 2023a, 2023b, 2023c, and 2023d.

The proximity of potential future residential and mixed use development enabled under the Housing Element Update to the Santa Barbara Airport and Santa Maria Airport could present a potential airport-related safety issue for future residents if development intensities exceed the standards established by the ALUCPs and the California Airport Land Use Planning Handbook. The risk of an aircraft accident increases with proximity to the runway and its approach path. Whether the use is considered incompatible or conditionally compatible ultimately depends on the type and intensity of the use, as well as the severity of the risk of an aircraft accident to the use. Residential uses, uses supporting the gathering of large groups of people (e.g., residents, guests, or workers), and uses presenting a greater degree of hazard (e.g., public facilities like schools and public safety facilities) are considered the most incompatible uses within airport Safety Zones (SBCAG 2022; 2023b; 2023c; 2023a; 2023d).

Implementation of the proposed Project has the potential to result in residential and mixed use development located within the AIA and ALUCP Safety Zones 2 and 4 for Santa Barbara Airport and Santa Maria Airport. In contrast, future housing projects would not substantially interact with the safety zones associated with the Lompoc, Santa Ynez, or Cuyama airports or VSFB.

Santa Barbara Airport

On the South Coast, a portion of Rezone Site Nos. 1 (Giorgi), 2 (St. Athanasius Church), and 7 (Caird 3) are located within Safety Zone 2, associated with departures from Runway 07-25 at Santa Barbara Airport. As described in Section 3.8.2.5, *Airport Safety Zones*, no new residential developments are compatible with Zone 2. Only existing light residential developments (i.e., less than 4 du/ac) and residential housing (i.e., farmworker housing, group residential, mobile home park, residential care facilities, single room occupancy, supportive housing, and transitional housing) as well as residential accessory uses (e.g., accessory dwelling units, caretaker units, family day care, and home occupation), parking, and open space may be accommodated within the zone itself. Any housing developed on these potential rezone sites would need to be condensed to the portions of the parcels outside of Safety Zone 2.

Portions of Rezone Site No. 2 (St. Athanasius Church) and the remainder of Rezone Site No. 7 (Caird 3) are located within Safety Zone 4 along with portions of Rezone Sites Nos. 3 (Scott) and 4 (Ekwill). Rezone Site Nos. 5 (Caird 1) and 6 (Caird 2), as well as two vacant sites, are located entirely within Safety Zone 4. Residential developments up to 4 du/ac are compatible within this zone. Residential developments involving 4 to 25 du/ac within this zone are conditionally compatible provided that they meet the maximum density and open land requirements described in the ALUCP.

As described in Chapter 2, *Project Description*, Rezone Sites No. 5-7 (Caird 1-3) could be rezoned to Design Residential (DR) 20/25, allowing up to 20-25 du/ac. Although this is compliant with the density allowable in Safety Zone 4, units built on Rezone Site No. 7 (Caird 3) would have to be clustered into the part of the parcel only in Safety Zone 4. To build the number of needed units at this potential housing site to meet the densities identified for Caird 3 in the Housing Element Update, the housing development may need to be built taller than the allowed height limits in this safety zone, and a calculation of the safe height of structures based on the Approach Slopes may be required. Alternatively, pursuant to Program 1 (Adequate Sites for RHNA and Monitoring of No Net Loss) of the Housing Element Update, the number of units at the site may be reduced to comply with height limitations or when proposed density is otherwise infeasible due to public health and safety concerns..

In addition, the southern parts of Rezone Sites Nos. 2 (St. Athanasius Church), 3 (Scott), and 4 (Ekwill) are within Safety Zone 4, but these sites could be rezoned to DR 30/40. As the allowable maximum residential density is restricted to 25 du/ac in Safety Zone 4, the density of housing units would need to be restricted in the portions of those parcels within Safety Zone 4. As only the northern portions of these sites are allowed to have densities greater than 25 du/ac, the number of units at Rezone Site Nos. 2 (St Athanasius Church), 3 (Scott), and 4 (Ekwill) may need to be reduced, which would contradict the goals of the proposed Project, or cause a significant and unavoidable land use compatibility impact by proposing greater housing density than allowed within Safety Zone 4.

Rezone Sites Nos. 18 (Friendship Manor), 1 (Giorgi), 2 (St. Athanasius Church), 3 (Scott), 4 (Ekwill), and 11 (Glen Annie) as well as several vacant sites, are fully or partially located within Safety Zone 6. Rezone Site No. 18 (Friendship Manor) is the only site fully within Safety Zone 6. All forms of residential development are compatible with Safety Zone 6.

Santa Maria Airport

In Orcutt, the northern portions of Rezone Site No. 26 (Northpoint HOA) and No. 24 (Key Site 26), as well as the entirety of two vacant sites, are located within Safety Zone 2, associated with arrivals along Runway 30 and departures along Runway 12 at Santa Maria Airport. No new residential

developments would be compatible with Santa Maria Airport Safety Zone 2. For Rezone Sites No. (Northpoint HOA) and No. 24 (Key Site 26), housing would need to be condensed to the southern part of the parcels, outside of Safety Zone 2.

Another portion of Rezone Site No. 26 (Northpoint HOA) and a portion of Rezone Site No. 24 (Key Site 26) are located within Safety Zone 4. Rezone Site Nos. 25 (Mariposa Real), 27 (Boys and Girls Club), 28 (Woodmere Villas HOA), and 29 (Hummel Cottages) are completely within Safety Zone 4. Rezone Sites Nos. 25 through 29 are all proposed to have DR 20/25 zoning, which would be compatible with the density allowed within Safety Zone 4. Two vacant sites are also located within Safety Zone 4. Residential development of these vacant sites would be required to comply with the same density requirements. Rezone Site No. 24 (Key Site 26), which is partially located within Safety Zones 2, 4, and 6, is proposed to be rezoned to DR 30/40. The portion within Safety Zone 4 would need to comply with the required maximum density of 25 du/ac.

The remainder of Rezone Site No. 24 (Key Site 26) and No. 28 (Woodmere Villas HOA) as well as Rezone Site No. 30 (Latter Day Saints) and several vacant sites are located within Safety Zone 6. As previously described, all forms of residential development are compatible with Safety Zone 6.

Conclusions

Housing development would have the potential to introduce new residents underlying airport Safety Zones 2, 4, and 6 to airport safety-related hazards. Future development of sites within the AIA of the Santa Barbara Airport and Santa Maria Airport is subject to compliance with existing rules and regulations of the applicable ALUCP, as well as other existing regulations governing development of land near existing airport (e.g., Code of Federal Regulations, Part 77). However, as~~As~~ described in Chapter 2, *Project Description,* Program 2 (Use by Right Approval) of the Housing Element Update would update the County zoning ordinances to allow use-by-right, which would allow use-by-right for housing projects that propose 20 percent of the units provided as affordable units and that are rezoned to a minimum of 20 du/ac. Rezone sites would not be subject to discretionary review by the County, and thus applicants could potentially be allowed to build to the maximum allowable density within their zoning. Rezone Sites No. 1, 2, 7, 24, and 26 are partially within Safety Zone 2, which prohibits all kinds of new residential development. Rezone Site Nos. 2, 3, 4, and 24 are partially within Safety Zone 4, which only allows residential densities of up to 25 du/ac, but these sites could be rezoned to DR 30/40 and result in building heights that could exceed allowable height limits in this safety zone. Such development may require a calculation of the safe height of structures based on the Approach Slopes may be required. Alternatively, pursuant to Program 1 of the Housing Element Update, the number of units at the site may be reduced to comply with height limitations or when proposed density is otherwise infeasible due to public health and safety concerns. To ensure consistency with the aircraft safety goals of the ALUCP and avoid airport hazards, the implementation of **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)** would require future applicants for residential development to comply with the density, height, and open land requirements provided in the ALUCPs for Santa Barbara Airport and Santa Maria Airport. For Safety Zone 2, this would require locating all new residential development outside of Safety Zone 2. Residential development within Safety Zone 4 would be required to observe the density of 25 du/ac or less and comply with open land requirements provided in the ALUCP. Implementation of this mitigation would ensure compliance with the requirements of the ALUCPs and ensure future development of sites within airport safety zones would not generate conflicts or risks associated with airport hazards. Impacts would be *significant but mitigable.*

3.8.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding communities (Tables 3-6, 3-7, and 3-8; Appendix I). Project impacts along with potential impacts from pending and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects, such as the Accessory Dwelling Unit (ADU) Ordinance Amendments (Cumulative Project No. 13) to incorporated cities in Santa Barbara County's 2023-2031 Housing Element Update (Cumulative Project No. 1 – 8) (Table 3-6).

Under each of these cumulative projects, each agency is planning for how to meet local housing needs and the RHNA assigned by SBCAG by identifying potential sites for new housing development, potential sites for rezoning to residential uses (where necessary), and implementing a variety of programs that would encourage or facilitate new residential development. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units. This includes the 18 pending residential development projects proposing the development of up to 1,331 new units that are identified in the Housing Element Update and would contribute to the County's ability to meet the RHNA for the unincorporated area.

Cumulative development projects would involve the transport, use, storage, and disposal of hazardous materials. However, as described in Impact HAZ-1, the handling, use, and storage of hazardous materials would continue to be governed by federal, state, and local laws and regulations. The proposed Project would not substantially contribute to a cumulatively significant impact. Additionally, cumulative development projects could result in a disturbance of hazardous sites or sites that have previously abandoned oil and gas facilities. As described for future residential development under the proposed Project in Impact HAZ-3, future development (e.g., under the housing element updates for the eight incorporated cities) could occur on hazardous sites or otherwise result in foreseeable upset involving the disturbance of existing soil or groundwater. New residential projects would be required to conform to all applicable regulations (e.g., County Comprehensive Plan, County Code, CalGEM, Unified Program, CUPA) that address hazardous materials including asbestos, lead, USTs, and contaminated soils and groundwater. Additionally, new development projects that are subject to discretionary review would continue to be reviewed under CEQA to evaluate potentially hazardous conditions at the sites. With the implementation of **MM HAZ-1 (Environmental Site Assessment)** and **MM HAZ-2 (Inadvertent Discovery of Contamination),** the proposed Project would not substantially contribute to cumulatively considerable impacts related to hazardous sites.

Cumulative projects including individual development projects and long-range planning efforts could result in additional encroachment within the existing safety zones for airports within the county, particularly in the South Coast and Santa Maria HMAs. For example, the City of Goleta has identified at least one underutilized site in Ellwood that would occur within Safety Zone 4. However, these projects would be required to comply with the land use compatibility standards of the ALUCPs. Additionally, new development projects that are subject to discretionary review would continue to be reviewed under CEQA for issues related to flight safety. While the Housing Element Update may result in project-specific impacts related to the inability to achieve the ALUCP density and open land requirements for sites partially or fully within a Safety Zone, cumulative impacts related to this issue are not anticipated.

3.8.4.4 Proposed Mitigation

MM HAZ-1: Environmental Site Assessment. Applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall retain a qualified hazardous materials Environmental Professional to prepare a Phase I ESA. The Phase I ESA shall be prepared in accordance with ASTM Standard Practice E 1527-13 or the Standards and Practices for AAI, prior to any land acquisition, demolition, or construction activities. The Phase I ESA shall identify specific RECs, if present, which may require further sampling / remedial activities by a qualified hazardous materials Environmental Professional with Phase II / site characterization experience prior to land acquisition, demolition, and/or construction. The Environmental Professional shall identify proper remedial activities to be implemented by the applicant/owner, if necessary.

Requirements and Timing: The applicant/owner shall submit the Phase I ESA as part of project application materials. County P&D shall review and confirm that all required remedial activities, if necessary, are reflected in project plans and permit requirements before the issuance of grading or building permits.

Monitoring: County P&D compliance monitoring staff shall ensure compliance with remedial activities, if necessary, through approval of project plans, a site visit, and/or applicant/contractor-provided documentation

MM HAZ-2. Incidental Discovery of Contamination. For future residential and mixed use development resulting from the proposed Project, in the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site, construction activities in the immediate vicinity of the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer, or similarly qualified individual) shall conduct an investigation to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant could pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of the contamination, if any, appropriate agencies shall be notified. If needed, a Site Health and Safety Plan that meets OSHA and Cal/OSHA requirements shall be prepared and in place prior to the commencement of work in any contaminated area.

Requirements and Timing: If previously unknown or unidentified soil and/or groundwater contamination is discovered, construction activities would stop immediately. The applicant/owner shall immediately notify County permit compliance staff. The applicant/owner would be responsible for contacting appropriate agencies (e.g., SBCFD). This condition shall be printed on all building and grading plans.

Monitoring: County permit compliance staff shall ensure that no further disturbance shall occur until the contaminates are identified and a soil management plan and/or remediation plan is prepared and implemented.

MM HAZ-3. Compliance with ALUCP Density and Open Land Requirements. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be consistent with the density, height, and open land requirements provided in the ALUCPs for airports in Santa Barbara County.

Requirements and Timing: This measure shall apply to applicable projects immediately following certification of this EIR. Within two years following EIR certification, the County shall adopt the ALUCPs and amend the zoning ordinances to comply with the density, height, and open land requirements in the ALUCPs for residential development.

Monitoring: County P&D compliance monitoring staff shall ensure compliance through a review of project plans.

3.8.4.5 Secondary Impacts

Implementation of **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)** would potentially create significant secondary impacts associated with changes in community character and land use compatibility. With the requirement to comply with ALUCP density and open land requirements in Safety Zone 2 and Safety Zone 4, in some instances, onsite developable acreage would be substantially reduced and sites designated for 25 to 40 du/ac may need to propose taller multiple-story development projects of up to four stories or more to meet maximum densities to achieve Housing Element Update goals, policies, and programs. Such potential impacts are discussed more fully in Section 3.1, *Aesthetics and Visual Resources,* and in Section 3.10, *Land Use and Planning*. However, as a matter of practice, the County would not exempt compliance with development airport safety standards, which is a matter of public health and safety. In these cases, if development is otherwise infeasible, pursuant to Program 1 of the Housing Element Update the County could allow a project applicant to request a lower density (i.e., fewer units) than the specified minimum density.

3.8.4.6 Residual Impacts

Impact HAZ-1. While future construction of residential developments would involve the transport, use, storage, and disposal of hazardous materials, these activities would continue to be governed by existing federal, state, and local laws and regulations. Following the completion of construction, residential uses do not generally involve the transport, use, disposal, or potential release of hazardous materials that could pose a significant hazard to the public or the environment. The impacts associated with the proposed Project would be *insignificant*.

Impact HAZ-2 and Impact HAZ-3. Future residential development facilitated by the proposed Project could occur on hazardous sites or otherwise result in foreseeable upset involving the disturbance of existing soil or groundwater contamination. However, the implementation of **MM HAZ-1 (Environmental Site Assessment)** would require the preparation of a project-specific Phase I ESA as well as subsequent site investigation and remediation, if necessary. Additionally, **MM HAZ-2 (Incidental Discovery of Contamination)** would address notification and remediation requirements in compliance with all federal, state, and local regulations (Section 3.8.3, *Regulatory Setting*). **MM HAZ-2** would also require that all construction activities cease in the immediate vicinity of the contamination until an investigation is conducted and a soil management plan and/or remediation plan is prepared. Residual impacts associated with Impact HAZ-2 and Impact HAZ-3 would be *potentially significant but mitigable.*

Impact HAZ-4. Implementation of **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)** would require future applicants for residential development to comply with the density, height, and open land requirements provided in the ALUCPs for Santa Barbara Airport and Santa Maria Airport. For Safety Zone 2, this would require locating all new residential development outside of Safety Zone 2. Residential development within Safety Zone 4 would be required to observe the density of 25 du/ac or less and comply with open land requirements provided in the ALUCP. Implementation of this mitigation would ensure compliance with the requirements of the ALUCPs and ensure future development of sites within airport safety zones would not generate conflicts or risks associated with airport hazards. Impacts would be *significant but mitigable.*

Section 3.9
Hydrology and Water Quality

3.9.1 Introduction

This section describes potential impacts related to hydrology and water quality that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). Hydrology and water quality issues include surface runoff and water quality, groundwater quality, withdrawal and recharge, groundwater pollution, and flood hazards. This analysis is based on the physical setting for hydrologic resources and water quality within the county and regulations that apply to:

- Water quality;
- Drainage and stormwater management;
- Management of groundwater resources and flood hazards; and
- Management practices and standards for residential development in the unincorporated areas of the county.

Issues related to water resources are also addressed in other sections of this Program Environmental Impact Report (EIR), including Section 3.4, *Biological Resources* (e.g., sensitive habitats and natural communities) and Section 3.15, *Utilities and Water Supply* (e.g., potable water supply, including groundwater, and wastewater disposal, including septic systems).

3.9.2 Environmental Setting

3.9.2.1 Surface Water

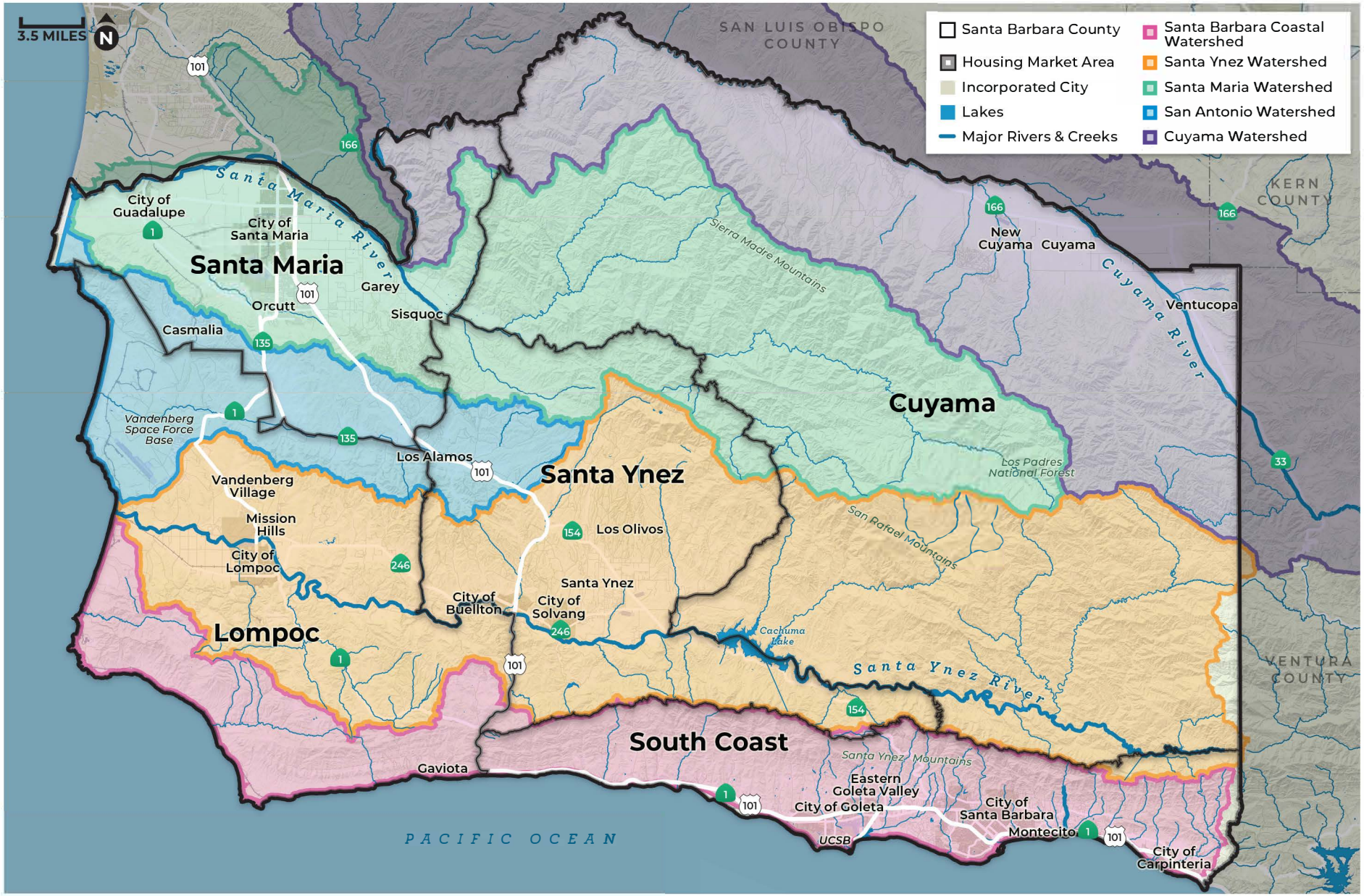
The California Department of Water Resources (DWR) identifies 10 hydrologic regions and 3 additional drainage areas within the State of California. Santa Barbara County is entirely located within the Central Coast Hydrologic Region. There are five major watersheds in the county: 1) the Santa Maria Valley Watershed; 2) the San Antonio Creek Watershed; 3) the Santa Ynez River Watershed; 4) the South Coast Watershed; and 5) the Cuyama River Watershed (Santa Barbara County Integrated Regional Water Management [IRWM] Cooperating Partners 2019a). Each watershed comprises sub-watershed basins associated with specific drainages. Many rivers and creeks make up the surface water that drains these watersheds. Major rivers and creeks in the county that drain these watersheds include the Santa Ynez River, Santa Maria River, Sisquoc River, Cuyama River, and San Antonio Creek (Figure 3.9-1).

The abundance of surface water varies from region to region, depending on precipitation and water use. The watersheds described in this report are listed in Table 3.9-1 and depicted in Figure 3.9-1 below, along with the major surface waters that drain these watersheds.

Table 3.9-1. Surface Waters in Santa Barbara County

Watershed Region	Major Surface Waters
South Coast Region	Surface waters in the South Coast Region comprise several smaller creeks. Major drainages include Rincon, Carpinteria, Franklin, Santa Monica, and Toro Canyon Creeks in Carpinteria; Cold Springs, Hot Springs, San Ysidro, and Romero Creeks in Montecito; Sycamore, Mission, San Roque, and Arroyo Burro Creeks in Santa Barbara; Cieneguitas, Arroyo Burro, and San Roque Creeks in Foothill; and Atascadero, Maria Ygnacio, San Jose, Tecolotito, and San Pedro Creeks in Goleta. Jalama Creek, Canada De La Gaviota, Canada Del Refugio, Canada Del Capitan, Dos Pueblos Canyon Creek, Tecolote Creek, and Glen Annie Canyon also drain this watershed. Many of these surface waters drain into the Pacific Ocean.
Cuyama River	The Cuyama River drains the Cuyama Valley Watershed to the Twitchell Reservoir. Salisbury Creek is also included in this watershed.
Upper Santa Ynez	The Upper Santa Ynez Watershed is primarily drained by the Santa Ynez River. The Santa Ynez River drains the north slope of the Santa Ynez Mountains, the south slope of the San Rafael Mountains, and much of the southern half of Santa Barbara County. Smaller drainages include Alder Creek and Rancho Nuevo Creek.
Middle Santa Ynez	The Santa Ynez River is the major drainage of the Middle Santa Ynez Watershed and is interrupted by Lake Cachuma. Additional drainages such as the extensive Santa Cruz Creek watershed and the smaller Cachuma Creek also drain into Lake Cachuma.
Lower Santa Ynez	While the Santa Ynez River is a major drainage in this watershed, other drainages include Alamo Pintado Creek, Santa Rosa Creek, San Miguelito Creek, and Salsipuedes Creek. Additionally, Zaca Creek and Zanja de Cota Creek both drain into the Santa Ynez River.
San Antonio Creek	The watershed is drained westerly by the San Antonio Creek and discharges into the San Antonio Lagoon at the Pacific Ocean.
Sisquoc River	The Sisquoc River drains the north side of the San Rafael Mountains and much of the Sierra Madre Mountains east of Santa Maria upstream of its confluence with the Cuyama River, which then flows into the Santa Maria River.
Shuman Creek	This watershed is drained westerly by Shuman Canyon Creek and Casmalia Canyon Creek.
Santa Maria River	The Santa Maria River Hydrologic Area includes all areas tributary to the Santa Maria River. The Santa Maria River is formed by the confluence of the Cuyama and Sisquoc approximately seven miles southwest of Santa Maria.
Orcutt Creek	Orcutt Creek Watershed is drained by Orcutt Creek, Guadalupe Lake, Santa Maria River, and Greene Valley River.
Santa Clara River	Sespe Creek, a tributary of the Santa Clara River, originates within the boundaries of Santa Barbara County.
Ventura River	Matilija Creek originates in the Los Padres National Forest, within the boundaries of Santa Barbara County, before draining into the Ventura River.

Source: Santa Barbara County IRWM Cooperating Partners 2019a.



Santa Barbara County Hydrologic Setting

FIGURE 3.9-1

3.9.2.2 Groundwater

Hydrologic regions are divided into groundwater basins. These basins underlie both unincorporated communities and incorporated cities of Santa Barbara County. Within the county, groundwater has historically accounted for the highest proportion of water use, supplying approximately 75 percent of domestic, commercial, industrial, and agricultural water from nine groundwater basins, which include the Carpinteria, Montecito, Santa Barbara, Foothill, Goleta, Santa Ynez River Valley, San Antonio Creek, Santa Maria River, and Cuyama Valley groundwater basins (Figure 3.9-2; Santa Barbara County IRWM Cooperating Partners 2019b).

Groundwater monitoring results have shown water level fluctuations that correlate with varying weather patterns of the area's semi-arid climate, with water levels generally increasing in years of higher precipitation and decreasing in drier years (Central Coast Regional Water Quality Control Board [RWQCB] 2016). Causes of overdraft in these basins are due to agricultural, municipal, and/or industrial uses. Groundwater-dependent areas in the county include the Cuyama Valley, the unincorporated communities of Los Alamos, Mission Hills, and Vandenberg Village, and the City of Lompoc. Groundwater basins in the county are summarized in Table 3.9-2.

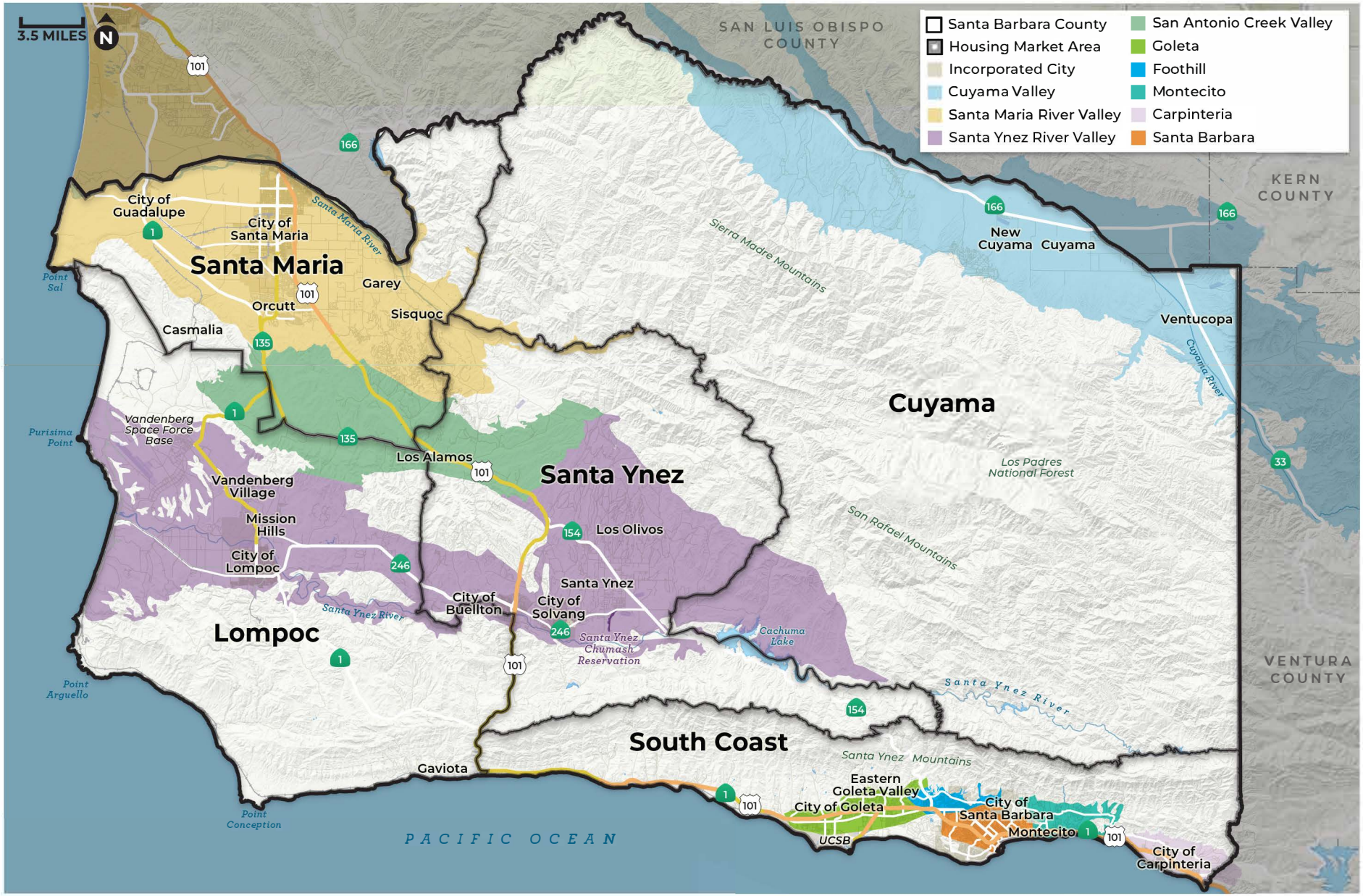
DWR created the California Statewide Groundwater Elevation Monitoring (CASGEM) Groundwater Basin Prioritization statewide ranking system to prioritize California groundwater basins to help identify, evaluate, and determine the need for additional groundwater level monitoring. Basin Prioritization is a technical process that utilizes the best available data and information to classify California's groundwater basins into one of four categories: high-, medium-, low-, or very low-priority. The process is based on the eight components that are identified in California Water Code Section 10933(b) (Section 3.9.3, *Regulatory Setting.*) Each basin's priority determines which provisions of CASGEM and the Sustainable Groundwater Management Act (SGMA) apply. SGMA requires medium- and high-priority basins to establish groundwater sustainability agencies (GSAs), develop groundwater sustainability plans (GSPs), and manage groundwater for long-term sustainability. Low and very-low priority basins are not considered at risk of overdraft and do not require the establishment of GSAs or preparation of GSPs. GSPs must achieve groundwater sustainability within 20 years of GSP adoption (Section 3.9.3, *Regulatory Setting*). Groundwater is managed by several GSAs within Santa Barbara County. As required by SGMA, agencies in each medium- and high-priority basin in the county have adopted or begun the process of drafting GSPs. GSAs for groundwater basins are included in Table 3.9-2 with groundwater basin characteristics, including total acre-feet (AF) available water in storage and current annual draw rates in acre-feet per year (AFY).

Table 3.9-2. Status of Groundwater Basins in Santa Barbara County

Groundwater Basin(s)	GSA	Available Water in Storage (AF)	Annual Draw (AFY)	Groundwater % of Supply	Basin Priority[1]
Carpinteria	Carpinteria Valley Water District	16,000	8,623	69%	High
Montecito	Montecito Water District	16,100	3,084	45%	Medium
Santa Barbara	--	10,000	530	3%	Very Low
Foothill	--	5,000	284	8%	Very Low
Goleta	--	70,000	4,404	34%	Very Low
Santa Ynez River Valley	Central Management Area GSA, Eastern Management Area GSA, Western Management Area GSA	1,314,000	54,979	94%	Medium
San Antonio Creek Valley	San Antonio Basin Water District, Los Alamos Community Services District	800,000	23,750	97%	Medium
Santa Maria Valley	--	1,100,000	97,982	83%	Very Low
Cuyama Valley	Cuyama Basin Groundwater Sustainability Agency	1,500,000	41,059	100%	High

[1] As a part of the CASGEM Program, the DWR created the CASGEM Groundwater Basin Prioritization statewide ranking system to prioritize California groundwater basins to help identify, evaluate, and determine the need for additional groundwater level monitoring.

Sources: California DWR 2023; Santa Barbara County Public Works Department 2022.



wsp

Santa Barbara County Groundwater Basins

FIGURE 3.9-2

The draw and recharge rates of groundwater vary by region. On the South Coast, groundwater is a secondary source of potable water. In contrast, North County potable water demand is largely supported by groundwater and/or shallow, riparian basin water. Natural groundwater recharge occurs from seepage losses of major streams, rainfall percolation, and subsurface inflow. Natural drainages and built reservoirs and dams are major sources of groundwater recharge. Additional recharge occurs from agricultural return flow and percolation of treated wastewater.

Groundwater within the county is monitored through a combination of the DWR's CASGEM Program, established in 2009, and the Santa Barbara County Water Agency (SBCWA). The SBCWA currently monitors 283 wells for depth to groundwater and 27 of these wells for water quality in cooperation with the United States Geological Survey (USGS) (County of Santa Barbara Public Works Department 2022). These monitoring wells are generally located in unincorporated areas of the county. Individual water districts and municipalities monitor many more wells in their service areas, although there are no recently published groundwater reports that indicate existing groundwater levels. The most recent reports rely on data from between 1992 and 2005.

In addition to groundwater reports, several public agencies within Santa Barbara County have adopted or are drafting groundwater management plans (i.e., GSPs) for their respective basins that reflect the hydrogeologic setting for the basin, describe groundwater conditions based on available data sources (e.g., monitoring well data, hydrographs), provide a groundwater budget, and establish sustainable management goals and minimum thresholds for long-term basin management. All medium- and high-priority basins within Santa Barbara County except Carpinteria have adopted GSPs. The Carpinteria GSA released its draft in the Fall of 2023 and it is anticipated to be adopted in 2024. In addition to GSPs, water is evaluated by the County on a project-by-project basis, using the County's *Environmental Thresholds and Guidelines Manual*, which describes the adopted County methodology for estimating the safe yield of bedrock aquifers (Section 3.9.4.1, *Thresholds of Significance*).

The County maintains historical data for salinity and nitrate concentration from monitoring wells for each of the groundwater basins in the County of Santa Barbara 2011 Groundwater Report (County of Santa Barbara 2012). Salinity in the Santa Maria River Valley, Santa Ynez River Valley, Foothill, Montecito, and Santa Barbara basins can be attributed to saltwater intrusion experienced in recent years (DWR 2023). Historically, high nitrate concentrations have been documented within groundwater basins within the county, including the Santa Maria and Santa Ynez Eastern Management Area basins. Additionally, elevated sulfate and/or chloride concentrations impact some regions of the groundwater basins in the county. Point sources of sulfates and nitrates include sewage treatment plants, industrial discharges, and agricultural return flows. While sulfates are not considered toxic to plants or wildlife at normal concentrations, concentrations of 500-750 milligrams per liter (mg/L) may cause a temporary laxative effect in humans. Sulfates can also form strong acids and change the pH characteristics of a water body. Chloride concentrations are a particular problem in low-lying areas of the basins near tidal marshes and are an indication of seawater intrusion (County of Santa Barbara 2012).

A summary of each county groundwater basin, including current conditions, is detailed below in the following subsections.

South Coast Groundwater Basins

Carpinteria

The Carpinteria Groundwater Basin is designated high priority by DWR. A draft GSP for the Carpinteria Groundwater Basin was released for public review in October 2023 and final adoption of the GSP is currently anticipated in 2024 (Santa Barbara County Public Works Department 2022). The basin encompasses a surface area of 12.7 square miles and is bounded on the north by consolidated rocks of the Santa Ynez Mountains, on the south and southwest by the Pacific Ocean, and on the west by consolidated rocks of Toro Canyon (DWR 2004a). The Carpinteria Basin is drained by the Carpinteria, Franklin, Gobernador, Rincon, Toro Canyon, and Santa Monica Creeks. Since 2017, annual precipitation in the basin has ranged from approximately less than 5 inches to 22 inches (Santa Barbara County Public Works Department 2021b).

Natural recharge in the basin is derived from infiltration of precipitation and streamflow, and to a limited extent, underflow (DWR 2004a). The basin contains two groundwater storage units, which are separated by the Rincon Creek thrust fault. Storage Unit #1 consists of four distinct aquifers, which are hydrologically connected. One is within the Carpinteria Formation and three are within the Casitas Formation. In Storage Unit #2, the main source of water is the Santa Barbara Formation. The Casitas Formation is generally considered the principal source of groundwater in the basin. The primary drainages through which surface water empties into the Pacific Ocean are Rincon Creek, Carpinteria Creek, Franklin Creek, and Santa Monica Creek. Besides groundwater, imported surface water from the State Water Project and local surface water from Lake Cachuma are the other sources of water available to water users within the basin (County of Santa Barbara 2012).

According to the 2022 Groundwater Basins Summary Report, water levels in the Carpinteria Groundwater Basin have been steadily dropping, with more rapid decreases in 2012 as a result of the drought, and rapid increases in 2017 following above-average precipitation. Recent measurements indicate minor drops in shallow wells and stability in deeper wells. Water levels declined to their historic minimum during the recent drought of 2012-2017. General trends indicate stability or continued increases in storage following above-average precipitation in 2017 and 2019 (Santa Barbara County Public Works Department 2022).

Montecito

The Montecito Groundwater Basin is designated as a medium priority by DWR and a GSP was adopted in May 2023 (County of Santa Barbara Public Works Department 2022). The Montecito Groundwater Basin encompasses a surface area of 9.8 square miles and is bounded on the north by the Santa Ynez Mountains and the Arroyo Parida fault, on the east by consolidated rocks, on the southeast by the Fernald fault, and on the northeast by a surface drainage divide that separates the Montecito and Carpinteria Groundwater Basins (DWR 2004b; County of Santa Barbara Public Works Department 2022). The offshore Rincon Creek fault and the Pacific Ocean bound the basin on the south. The primary aquifers in the Montecito Basin are the unconsolidated alluvial deposits and the Casitas and Santa Barbara Formations.

The basin is drained by several creeks that flow from the Santa Ynez Mountains south to the Pacific Ocean, including Toro Canyon Creek. Natural recharge in the basin is derived from the infiltration of precipitation over the basin, seepage from streams, and subsurface inflow from consolidated rocks

(DWR 2004b). Since 2017, annual precipitation in the basin has ranged from approximately less than 6 inches to 26 inches per year (County of Santa Barbara Public Works Department 2022).

According to the 2022 Groundwater Basins Summary Report, water levels declined to their historic minimum during the recent drought of 2012-2017. General trends indicate stability or continued increases in storage following above-average precipitation in 2017 and 2019. Starting in 2019, water levels have remained stable or slowly increased (County of Santa Barbara Public Works Department 2022).

Santa Barbara

The Santa Barbara Groundwater Basin is designated very low priority and is not currently subject to SGMA (County of Santa Barbara Public Works Department 2022). The Santa Barbara Groundwater Basin underlies an area of about 9.6 square miles (DWR 2004c; County of Santa Barbara Public Works Department 2022). Geologic faults define the borders of the basin and impede the flow of groundwater on its north, northwest, and southwest sides, as well as the Pacific Ocean to the south. The primary aquifer in the Santa Barbara Groundwater Basin is the Santa Barbara Formation, which is generally comprised of marine sands, silts, and clays. Drainages that traverse the basin are Sycamore, Mission, San Roque, and Arroyo Burro creeks; all of these creeks flow intermittently in their lower reaches where the surface water percolates into the unconsolidated deposits. The major sources of recharge are infiltration of precipitation, seepage from streams, subsurface inflow from consolidated rocks, and infiltration of return flows of water imported to the City of Santa Barbara(DWR 2004c). Since 2017, annual precipitation in the basin has ranged from approximately less than five inches to 22 inches (County of Santa Barbara Public Works Department 2022).

According to the 2022 Groundwater Basins Summary Report water levels declined to their historic minimum during the recent drought of 2012-2017. General trends indicate stability or continued increases in storage following above-average precipitation in 2017 and 2019 (Santa Barbara County Public Works Department 2022).

Foothill

The Foothill Groundwater Basin is designated very low priority by DWR and is not currently subject to SGMA (County of Santa Barbara Public Works Department 2022). The Foothill Groundwater Basin encompasses approximately 4.9 square miles and is bounded on the north and northeast by Tertiary sedimentary rocks of the Santa Ynez Mountains, on the northwest by the Goleta fault, on the southwest by the Modoc and Mesa faults, on the south by the More Ranch fault, and on the southeast by the Mission Ridge fault (DWR 2004d). Natural recharge in the basin is derived from the infiltration of precipitation, seepage from streams, and subsurface inflow from consolidated rocks of the Santa Ynez Mountains. Water imported from Lake Cachuma provides additional recharge. The Santa Barbara Formation is the primary aquifer of the basin. Since 2017, annual precipitation in the basin has ranged from approximately 9 inches to 26 inches (County of Santa Barbara Public Works Department 2022).

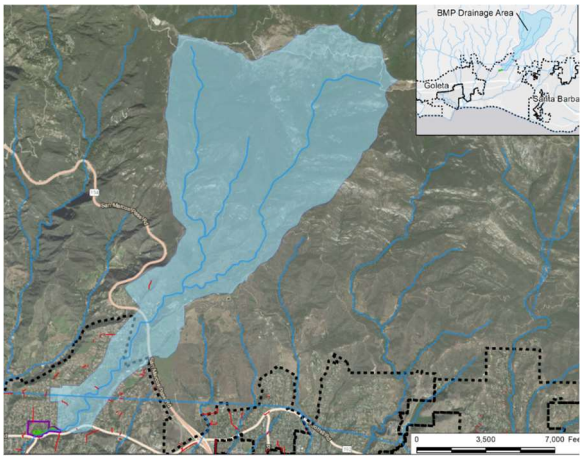
According to the 2022 Groundwater Basins Summary Report, water levels declined to their historic minimum during the recent drought of 2012-2017. General trends indicate stability or continued increases in storage following above-average precipitation in 2017 and 2019 (Santa Barbara County Public Works Department 2022).

Goleta

The Goleta Groundwater Basin encompasses the Goleta Valley, an area of approximately 14.4 square miles, and is currently designated very low priority by DWR and is not currently subject to SGMA. The Goleta Groundwater Basin was adjudicated in 1989 (County of Santa Barbara Public Works Department 2022).[1] The basin is bounded on the west by the topographic divide east of Ellwood Canyon and on the southeast by the Modoc fault. This basin is divided into three subbasins: the Central Subbasin, the West Subbasin, and the North Subbasin (County of Santa Barbara 2012). The majority of available groundwater is within the North-Central Subbasin.

The principal water-bearing units in the Goleta Groundwater Basin are alluvium ranging in age from Holocene to Pleistocene, and the Santa Barbara Formation of Pleistocene age. Surface waters drain through the Maria Ygnacio, Atascadero, San Antonio, San Jose, and Los Carneros creeks, which eventually drain into the ocean. Natural recharge in the basin is derived from infiltration of precipitation, seepage from streams, and subsurface inflow from consolidated rocks (DWR 2004e). Since 2017, annual precipitation in the basin has ranged from approximately 9 to 25 inches (County of Santa Barbara Public Works Department 2022).

According to the 2022 Groundwater Basins Summary Report, water level trends indicate rapid declines in levels starting in 2012 with general stability starting again in 2018. Levels remain higher than the historic lows observed following the 1987-1990 drought (County of Santa Barbara Public Works Department 2022).



A drainage area in Tucker's Grove has the potential to recharge the Goleta Groundwater Basin by 98 AFY if stormwater improvement projects are implemented.
Source: Santa Barbara County Cooperating Entities 2021.

A 2018 technical study prepared as part of the Santa Barbara Countywide Integrated Stormwater Resource Plan identified parcels in the county for future structural stormwater best management practice (BMP) opportunities. The study found that Tucker's Grove in northern Eastern Goleta Valley is a groundwater recharge site for the Goleta Groundwater Basin receiving water from San Antonio Creek. A 1.7-acre parcel located north of the Cathedral Oaks Road and North Turnpike Road intersection has the potential to supply 98 AFY of groundwater recharge with future stormwater improvements (Santa Barbara County Cooperating Entities 2021).

[1] An adjudication is a court ruling issued for basins or specific areas of a basin where water users are in dispute over legal rights to the water. The adjudication defines who the water rights owners are, how much groundwater those rights owners can extract, and how the groundwater in the area will be managed.

Santa Ynez Valley and Lompoc Valley Groundwater Basins

Santa Ynez River Valley

The Santa Ynez River Valley Groundwater Basin is defined by DWR as a medium-priority basin (County of Santa Barbara Public Works Department 2022). GSPs for this basin were adopted in January 2022. This basin covers approximately 319 square miles and is bounded by the Purisima Hills on the northwest, the San Rafael Mountains on the northeast, the Santa Ynez Mountains on the south, and the Pacific Ocean on the west. On the east and underlying the groundwater basin, the basin is bounded by consolidated non-water-bearing rocks of Tertiary age. Previous reports have divided the basin into five parts: Santa Ynez Uplands, Lompoc Plain, Lompoc Terrace, Lompoc Uplands, and the Buellton Uplands. However, the current 2022 Groundwater Basins Summary Report divides the Santa Ynez Valley Groundwater Basin into three management areas: the western portion, comprised of the Lompoc Plain, Lompoc Terrace, and Lompoc Uplands and a portion of the Santa Ynez River Alluvium; the eastern portion, comprised of the Santa Ynez Uplands and a portion of the Santa Ynez River Alluvium; and the central portion, comprised of Buellton Uplands and a portion of the Santa Ynez River Alluvium (Santa Barbara County Public Works Department 2022). The water-bearing formations of the basin include unconsolidated alluvial and terrace deposits, such as the Orcutt Formation, and the Paso Robles and Careaga Formations. Recharge in the basin is derived from infiltration of precipitation, stream flows, and percolation of irrigation water and wastewater effluent. Precipitation across the valley ranges from 15 to 21 inches, with an average of 17 inches (DWR 2004f). From 2016 to 2021, annual precipitation in the basin ranged from approximately 8 to 26 inches (County of Santa Barbara Public Works Department 2022).

According to the 2022 Groundwater Basins Summary Report, water levels within the Lompoc Uplands have continued to decline for the period of available records starting in 1930. Lompoc Plain water levels continue to remain stable with declines observed in the Santa Rita subbasin. Water levels within the alluvium along the river have historically remained stable as a result of direct recharge from the Santa Ynez River. Water levels within the central management area have historically been stable, with minimal long-term declines. Over the past 10 years, water levels have generally declined in both shallow and deep wells north of the river alluvium in this management area. Water levels in the western portion of the eastern management area have continued to decline in recent years, while water levels within the uplands and foothills to the east have historically remained stable, showing some gradual declines in recent years as a result of the drought. A majority of the wells in this management area have had declining water levels over the past 10 years.

Santa Maria Region Groundwater Basins

San Antonio Creek Valley

The San Antonio Creek Valley Groundwater Basin is a medium-priority basin (County of Santa Barbara Public Works Department 2022). The San Antonio Creek Valley Groundwater Basin GSP was adopted in March 2023. The San Antonio Creek Valley Groundwater Basin encompasses approximately 128 square miles and is bounded on the north by the Casmalia Hills and the Solomon Hills, on the south by the Purisima Hills and Burton Mesa, and on the west by the Pacific Ocean (DWR 2004g). The basin is drained by San Antonio Creek. Groundwater is found in alluvium, dune sand, terrace deposits, and the Orcutt, Paso Robles, and Careaga Formations. Natural recharge in the basin is derived from infiltration of precipitation and seepage from streams (DWR 2004g). Annual average precipitation in

the western part of the San Antonio Creek Valley watershed where the basin is located is about 15 inches and 22 inches in the Solomon Hills and eastern uplands areas (USGS 2022).

Groundwater is the only water supply source within the basin. Land within the valley is used primarily for agriculture, and production shifted in the 1980s from non-irrigated pastureland to irrigated crops and vineyards. This land use change resulted in an increase in groundwater withdrawals, which has exceeded recharge and reduced storage within the aquifer (County of Santa Barbara Public Works Department 2022).

According to the 2022 Groundwater Basins Summary Report water level declines within some locations in this basin have been greater than 100 feet since the 1950s and general trends indicate a continued reduction in storage throughout the basin in both the shallow and deep aquifer systems. Long-term trends indicate water levels are dropping more rapidly within the Paso Robles Formation and water levels are at historic lows (County of Santa Barbara Public Works Department 2022).

Santa Maria River Valley

The groundwater basin is defined by DWR as a very low priority and is currently not subject to the SGMA. The groundwater basin was adjudicated in 2008 (County of Santa Barbara Public Works Department 2022). The Santa Maria River Valley Groundwater Basin covers 288 square miles and is bounded on the north by the San Luis and Santa Lucia Ranges, on the east by the San Rafael Mountains, on the south by the Solomon Hills and the San Antonio Creek Valley Groundwater Basin, on the southwest by the Casmalia Hills, and the west by the Pacific Ocean. The basin is drained westward by several rivers and creeks including the Sisquoc, Cuyama, and Santa Maria Rivers and the Orcutt, Arroyo Grande, Pismo, and Nipomo creeks. Groundwater is found in alluvium, dune sands, and the Orcutt, Paso Robles, Pismo, and Careaga Formations. Natural recharge in the basin is derived from seepage losses from the major streams, percolation of rainfall, and subsurface flow. Annual precipitation ranges from 13 to 17 inches, with an average of 15 inches (DWR 2004h). Since 2017, annual precipitation in the basin has ranged from approximately 6 inches to 22 inches (County of Santa Barbara Public Works Department 2022).

According to the 2022 Groundwater Basins Summary Report, water levels in the basin began to noticeably decline in 1945, coinciding with an increase in agricultural acreage and urban population and reached historic lows in the late 1960s. Levels have fluctuated significantly throughout the basin in recent decades as a result of climatic fluctuations, land use changes, discharge from the Sisquoc River, and Twitchell Reservoir storage availability. Although highly variable, water levels maintained general stability following the 1960s and reached near-historic highs in 2002. Water levels have been steadily declining since 2002, with more rapid drops starting at the beginning of the most recent drought in 2012. Most areas throughout the basin are currently at or near historic lows.

Cuyama Valley Groundwater Basin

The Cuyama Valley Basin is defined by DWR as a high-priority, critically over-drafted basin (County of Santa Barbara Public Works Department 2022). The Cuyama Valley Basin GSP was adopted in March 2023. The basin covers 230 square miles and is bound on the north by the Caliente Range and on the southwest by the Sierra Madre Mountains. The four formations in the Cuyama Basin that can supply water are the Morales Formation, Cuyama Formation, older and younger alluvium, and terrace deposits. The Morales Formation is the main aquifer in the basin, and its permeability varies greatly both laterally and vertically. Average annual precipitation in Cuyama Valley ranges from

approximately seven inches on the valley floor and 15 inches in the eastern part of Cuyama Valley (USGS 2014). The basin is drained by the Cuyama River.

Groundwater is the only water supply source available within the Cuyama Valley Groundwater Basin (County of Santa Barbara Public Works Department 2022). Agriculture dominates land use in the valley. The petroleum industry located on the basin anticlines also uses groundwater for oil recovery and processing/transportation (County of Santa Barbara 2009). Continued groundwater withdrawals during the last 80 years have exceeded recharge in many parts of the basin and reduced storage within the aquifer.

The Cuyama Valley Basin is further divided into six threshold regions: northwestern, western, central, eastern, southeastern, and badlands. The Badlands Threshold Region is not located within Santa Barbara County and no further water data is available. The Northwestern Threshold Region water levels have remained fairly stable. However, in 2015, a new vineyard was developed within the eastern portion of this subbasin and deep wells within the eastern portion of this region have experienced continued declines, with water levels dropping 40 feet on average since pumping began in 2016. Water levels in the Western Threshold Region have remained stable for decades. In the Central Threshold Region, groundwater levels have dropped by more than 500 feet. Recent monitoring indicates that levels continue to decline in this threshold region, with levels at historic lows. Groundwater levels in the Eastern Threshold Region have responded favorably to recent precipitation and are above historic lows. Water levels in the Southeastern Threshold Region are shallow with a depth of 50 feet (County of Santa Barbara Public Works Department 2022).

3.9.2.3 Water Quality

Multiple surface water features in the county are listed under the State Water Resources Control Board's (SWRCB) 303(d) Impaired Water Bodies List (Table 3.9-3). The 303(d) List is required by the 1972 Amendments to the Federal Water Pollution Control Act, also known as the Clean Water Act (CWA), and is established to regulate water pollution in the U.S. There are many segments of water bodies within the county that are on the 303(d) List, including Greene Valley Creek, Casmalia Canyon Creek, Glen Annie Canyon Creek, Bradley Channel, Main Street Channel, Carpinteria Creek, Guadalupe Dunes, Ocean Beach, East Beach, North Main Street Channel, Arroyo Burro Beach, Devereux Creek, Tecolotito Creek, Bell Creek, Cieneguitas Creek, Sycamore Creek, Franklin Creek, Hope Ranch Beach, Leadbetter Beach, Hammonds Beach, Carpinteria State Beach, Goleta Beach, Jalama Beach, Refugio Beach, East Beach, Rincon Beach, Toro Canyon Creek, and an unnamed tributary to Orcutt Creek.

Listed water bodies greater than five miles in length are included in Table 3.9-3 below along with their identified pollutants and expected Total Maximum Daily Load (TMDL) completion dates. TMDLs are intended to bring receiving water bodies into compliance with water quality objectives for their designated beneficial use, and hence, removal from the 303(d) List. TMDLs establish a maximum concentration of a particular pollutant that is permitted to occur in a receiving water body. The primary pollutants affecting waters in the county are the result of land development and agricultural uses, and the primary pollutants of concern are chloride, E. coli, fecal coliform, nitrate, mercury, and sodium.

Table 3.9-3. Major Surface Waters in the Project Area on the California 303(d) List

Water Body	Miles Affected	Pollutant(s)	TMDL Status[1]	Expected Completion
Lake Cachuma	3,168.7 acres	Mercury	5A (TMDL required)	2035
Carpinteria Marsh (El Estero	200.9 acres	Nutrients, dissolved oxygen, priority organics	5A (TMDL required)	2027, 2035
Jameson Lake	118.4 acres	Mercury	5A (TMDL required)	2035
Bradley Canyon Creek	16.5	Dissolved turbidity,	5A/5B (TMDL required)	2035
Orcutt Creek	15	Arsenic, benthic community effects, boron, carbaryl, chloride, copper, imidacloprid, malathion, oxyfluofen, linuron, molybdenum, nickel, prometryn, specific conductivity, selenium, sodium, water temperature, turbidity, toxicity, zinc	5A/5B (TMDL required)	2027, 2035
Santa Barbara Harbor	98.3 acres	Arsenic, copper, dieldrin, and dissolved oxygen	5A (TMDL required)	2027, 2035
Sisquoc River	59.9	pH	5A (TMDL required)	2035
Santa Ynez River (Cachuma Lake to Lompoc)	40.7	Benthic community effects, molybdenum, dissolved oxygen, sedimentation/siltation, sodium, water temperature, toxicity, total dissolved solids	5A (TMDL required)	2027, 2035
San Antonio Creek (Rancho del las Flores Bridge at Highway 135 to Railroad Bridge)	29.3	Ammonia, arsenic, boron, chloride, E. coli, dissolved oxygen, nitrate, selenium, sodium, and toxicity	5A/5C (TMDL required)	2025, 2035
Santa Ynez River (above Lake Cachuma)	22.2	Water temperature, turbidity, and toxicity	5A (TMDL required)	2023, 2035
Santa Ynez River (Lompoc to the Pacific Ocean)	6.7	Benthic community effect, chloride, E. coli, molybdenum, dissolved oxygen, nitrate, sedimentation/siltation, sodium, water temperature, toxicity, and total dissolved solids	5A (TMDL required)	2025, 2027, 2035
San Miguelito Creek	10.1	Chloride, nitrate, dissolved oxygen, sodium, water temperature, pH, and toxicity	5A (TMDL required)	2023, 2025, 2035
Jalama Creek	10.6	Chloride, E.coli, and sodium	5A/5B (TMDL required)	2035
Salsipuedes Creek	9.0	Chloride, E.coli, and sodium	5A (TMDL required)	2035
Canada De La Gaviota	7.1	Arsenic, boron, chloride, copper, nickel, selenium, and sodium	5A (TMDL required)	2035

Table 3.9-3. Major Surface Waters in the Project Area on the California 303(d) List (Continued)

Water Body	Miles Affected	Pollutant(s)	TMDL Status[1]	Expected Completion
Canada Del Refugio	6.9	Chloride, and sodium	5A (TMDL required)	2035
Dos Pueblos Canyon Creek	7.1	Sodium	5A (TMDL required)	2035
Santa Monica Creek	5	E. coli, pH, water temperature, and turbidity	5A (TMDL required)	2035
Tecolote Creek	6.9	Boron, chloride, copper, E. coli, dissolved oxygen, specific conductivity, total dissolved solids, and sodium	5A (TMDL required)	2035
Sloans Canyon Creek	6.7	Ammonia, pH, and turbidity	5A (TMDL required)	2023, 2027
Carneros Creek	6.1	Specific conductivity, enterococcus, E. coli, toxicity, and nitrate	5A/5B (TMDL required)	2027, 2035
San Pedro Creek	6.3	Enterococcus, E. coli, fecal coliform, pH, and sodium	5A (TMDL required)	2027, 2035
San Jose Creek	9.9	Chloride, dissolved oxygen, enterococcus, sodium, and specific conductivity	5A (TMDL required)	2027, 2035
Goleta Slough/Estuary	167.1 (acres)	Indicator bacteria, enterococcus, dissolved oxygen, pH, and priority organics	5A (TMDL required)	2027, 2035
Shuman Canyon Creek	8.7	Sedimentation/Siltations	5A (TMDL required)	2027
Maria Ygnacio Creek	7.2	Enterococcus, E. coli, sodium, and turbidity	5A (TMDL required)	2027, 2035
Atascadero Creek	6.2	Arsenic, benthic community effect, fecal coliform, chloride, enterococcus, manganese, nitrate, dissolved oxygen, pH, sodium, selenium, water temperature, total dissolved solids, and toxicity	5A (TMDL required)	2027, 2035
Arroyo Burro Creek	6.3	Selenium, toxicity, and dissolved oxygen	5A (TMDL required)	2035
Mission Creek	8.7	Chlorade, E. coli, fecal coliform, dissolved oxygen, and toxicity	5A (TMDL required)	2035
Canada Del Capitan	5.8	Toxicity	5A	2027
Santa Maria River Estuary	5.6	Oxyfluorfen, pH, prometryn,	5A (TMDL required)	2035
Rincon Creek	10.2	Ammonia, arsenic, boron, sodium, nitrate, chloride, copper, dissolved oxygen, selenium, nickel, specific conductivity, total dissolved solids, toxicity, and turbidity	5A (TMDL required)	2023, 2027
Romero Creek	5.1	pH	5A (TMDL required)	2027

Table 3.9-3. Major Surface Waters in the Project Area on the California 303(d) List (Continued)

Water Body	Miles Affected	Pollutant(s)	TMDL Status[1]	Expected Completion
Arroyo Paredon	5.3	Boron, chloride, copper, diazinon, E. coli, fecal coliform, nitrate dissolved oxygen, nickel, sodium, pH, selenium, specific conductivity, temperature, and toxicity	5A/5B (TMDL required)	2035
Pacific Ocean at Santa Cruz Island	129,820 acres	Mercury	5A (TMDL required)	2035
Pacific Ocean, Coal Oil Pt. to Rincon Pt.	43,849 acres	DDT (Dichlorodiphenyltrichloroethane)	5A (TMDL required)	2035

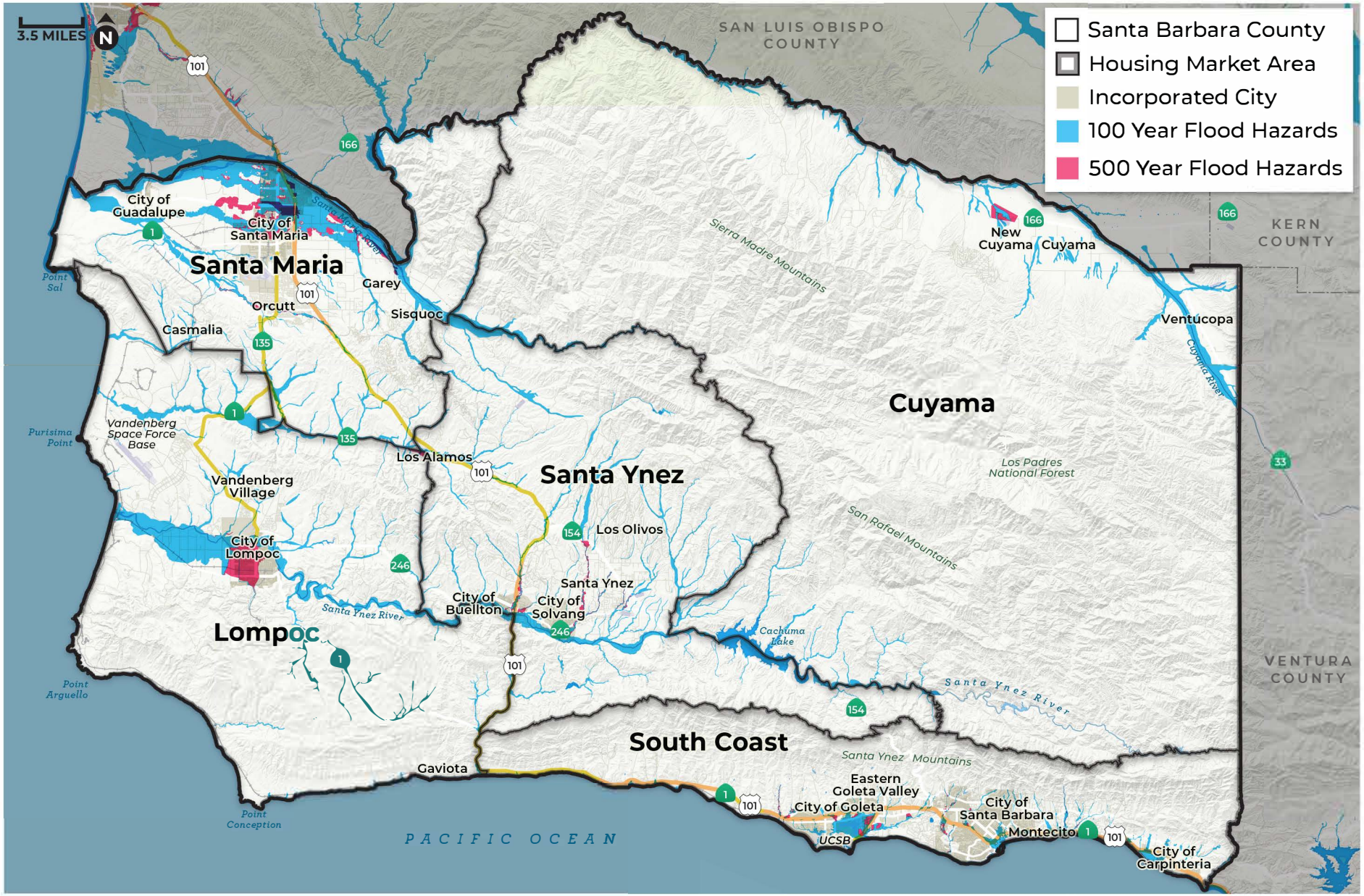
[1] Category 5A: standards are not met and TMDL still required; Category 5B: water quality being addressed by the United States Environmental Protection Agency (USEPA)-approved TMDL.
Source: SWRCB 2022.

3.9.2.4 Flood Hazards

Flood hazards in the county include coastal storm surges and inland flooding. High-hazard flood zones are concentrated in coastal areas, including bays, coastal inlets, and estuaries, and in watershed areas connecting local mountain ranges to the coastal region where flash floods may occur (County of Santa Barbara 2015). Flood hazards in the North County (Santa Ynez Valley, Lompoc Valley, Cuyama Valley, and Santa Maria Valley) are typically associated with three major rivers, the Santa Maria River, the Cuyama River, and the Santa Ynez River, as well as their major tributaries. Flooding hazards along the South Coast are typically associated with creeks and streams that flow from the Santa Ynez Mountains to the Pacific Ocean, as well as storm surges and coastal flooding (SBCOEM 2023). These streams are subject to high flows following intense precipitation. Drainages along the coastline of the county are characterized by short-duration, high-intensity runoff events.

The Federal Emergency Management Agency (FEMA) uses Flood Insurance Rate Maps (FIRM) to show flood risk through a series of zones. Figure 3.9-3 depicts 100-year and 500-year flood hazard zones within the county. Zone categories include:

- Zone A – areas represent a 100-year flood zone and are defined as having a 1 percent chance of flooding annually. Zone A areas are located primarily near or adjacent to rivers and creeks and downslope from mountain drainages where topography indicates an increased potential for flooding.
- Zone AE – areas have a 1 percent annual chance of flooding and flood base elevations;
- Zone AO – areas with river or stream flood hazard with a 1 percent or greater chance of shallow flooding annually;
- Zone V – coastal areas with a 1-percent or greater chance of annual flooding and with the additional hazard of storm waves;
- Flood Zone VE – areas with V zoning as well as base flood elevations;
- Zone D – areas with undetermined flood risk;



Santa Barbara County Flood Hazards

FIGURE 3.9-3

- Zone X – a non-special flood hazard area Zone X corresponds to areas outside of the 500-year flood zone and is defined as the flood insurance rate zone that corresponds to areas outside of the 0.2-percent annual chance floodplain, areas within the 0.2-percent annual chance floodplain, areas of 1-percent annual chance flooding where the contributing drainage is less than 1 square mile, and areas protected from the one percent annual chance flood by levees.

FEMA indicates that portions of the county are within flood hazard Zone A (i.e., 100-year or 1-percent annual chance flood zone), Zone X (i.e., 500-year or 0.2-percent annual chance flood zone), and Special Flood Hazard Areas (SFHAs) (County of Santa Barbara 2020). The Santa Ynez Valley contains the largest area of FEMA 1-percent annual chance flood zone areas in the county, particularly along the lower Santa Ynez River. Based on Geographic Information System (GIS) flood data analysis conducted for the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan (MJHMP), an estimated 9,190 residents are living in the 1-percent annual chance floodplain throughout the county (SBCOEM 2023). Table 3.9-4 below shows the total acreage anticipated to be flooded under a 1-percent annual chance flood as provided by FEMA, broken down by Housing Market Area (HMA). As shown, as much as 5.98 percent or 48,818 acres could be inundated in a FEMA-recognized 100-year or 1-percent annual chance flood.

Table 3.9-4. FEMA Riverine 1-Percent Annual Chance Flood Acreage Inundation by HMA*

HMA	Flood Zone Acres	Total Acres	Percent
Cuyama Valley	9,782	112,783	8.67%
Lompoc Valley	10,102	195,287	5.17%
Santa Maria Valley	10,427	178,146	5.85%
Santa Ynez Valley	13,641	252,907	5.39%
South Coast	4,865	77,020	6.32%
Total	**48,818**	**816,143**	**5.98%**

* Includes unincorporated areas and incorporated cities within Santa Barbara County.
Source: SBCOEM 2023.

Stormwater

The county encompasses approximately 2,800 square miles primarily consisting of rugged mountainous terrain, which can result in rapid local and regional watershed flow during major rain events. In the summer, the county's climate is generally warm and dry, while it is cool and wet in the winter months. The wet winter months normally occur during December, March, and April (County of Santa Barbara 2020).

Stormwater runoff from lands modified by human activities can harm surface water resources and in turn, cause or contribute to a failure to meet water quality standards, by changing natural hydrologic patterns, accelerating stream flows, destroying aquatic habitat, and elevating pollutant concentrations. Urban development can contribute to degraded water quality because activities and land uses associated with urban development contribute higher levels of pollutants than the natural watershed conditions. Such runoff may contain or mobilize high levels of contaminants, such as sediment, suspended solids, nutrients (e.g., phosphorous and nitrogen), heavy metals and other toxic pollutants, pathogens, oxygen-demanding substances, and floatables (e.g., trash, foliage, and grass clippings). After a rain event, stormwater runoff carries these pollutants into nearby streams, rivers, lakes, estuaries, and wetlands as well as the ocean. The highest concentrations of these contaminants

often are contained in "first flush" discharges, which occur during the first major storm after an extended dry period. Individually and combined, these pollutants impair water quality, threatening designated beneficial uses and causing habitat alteration or destruction. To address these impacts the County has prepared the Countywide Integrated Stormwater Resource Plan (SWRP), which utilizes watershed-based natural solutions to capture, treat, and use stormwater and dry weather runoff (Santa Barbara County Cooperating Entities 2021).

Within agricultural areas of the county, stormwater can have the additional effect of increased sedimentation. When soil is disturbed by rain, it is transported through a watershed via storm runoff to natural drainages, or scouring of natural channels, due to increased flow from runoff of impervious surfaces. Stormwater flow along creeks with natural banks may be susceptible to scour, bank collapse, or deeper incising of portions of the channel with increased runoff.

The Santa Barbara County Flood Control and Water Conservation District (Flood Control District) is responsible for channel maintenance, the design and construction of capital improvements, the review of new development, and a hydrologic data collection/flood warning system. The Flood Control District's Operation and Maintenance Program involves the operation of the Flood Control District's basins, channels, and other flood-protection facilities as well as routine and emergency maintenance and repair of these facilities. The Flood Control District operates and maintains dams, 264 miles of channels and storm drains, 78 retention/recharge/debris basins, and many major storm drain systems (County of Santa Barbara 2021a). During flood events, the Flood Control District staff switch modes and become an emergency response organization, focusing on flood-fighting and support activities in coordination with the Santa Barbara County Office of Emergency Management (SBCOEM) (SBCOEM 2023). Much of the costs from equipment and operations of these emergencies are funded by the Flood Control District's emergency reserve funds, while as little as 50 percent of the total disaster costs are reimbursed by the federal and state governments, which can happen months, or years, after the flood event (County of Santa Barbara 2021a).

Tsunami and Seiches

Tsunamis are giant ocean waves generated during large coastal or submarine earthquakes. Seiches are a change in wave height of an enclosed body of water, such as a lake, during an earthquake. The County's Seismic Safety and Safety Element indicates that both tsunamis and seiches could occur within the county, but seiches would be more frequent (County of Santa Barbara 2015). The areas along the county's unincorporated coast that are subject to tsunami inundation are the mouth of the Santa Maria River, the mouth of the Santa Ynez River west of Lompoc, the Goleta Slough-Santa Barbara Airport area, Toro Canyon-Carpinteria, and the beaches of Refugio, El Capitan, and Gaviota. Per the Seismic Safety and Safety Element of the Comprehensive Plan, the County's policy for all coastal installation and development planning projects is to consider a 10-foot-high sea wave and use a contour elevation of 40 feet to establish the tsunami risk limit. Water bodies subject to seiches in the county include Lake Cachuma, Twitchell, and Gibraltar reservoirs, and Jameson and Zaca lakes. Small waves would pose little threat other than the potential damage to recreational facilities along their shores, but large waves caused by large landslides triggered by earthquakes could overtop a dam and cause damage to the area downstream (County of Santa Barbara 2015).

3.9.3 Regulatory Setting

Federal, state, and local regulations have been enacted to address hydrology and water quality in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the proposed Project and its associated impacts.

3.9.3.1 Federal

Clean Water Act

In 1972, the Federal Water Pollution Control Act (later referred to as the Clean Water Act [CWA]) was amended to require that the discharge of pollutants into waters of the U.S. from any point source be effectively prohibited unless the discharge complies with a National Pollutant Discharge Elimination System (NPDES) permit. In 1987, the CWA was again amended to require that the United States Environmental Protection Agency (USEPA) establish regulations for the permitting of stormwater discharges (as a point source) by municipal and industrial facilities and construction activities under the NPDES permit program. the regulations require that Municipal Separate Storm Sewer System (MS4) discharges to surface waters be regulated by an NPDES permit.

The CWA requires states to adopt water quality standards for water bodies and have those standards approved by USEPA. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, and fishing), along with water quality criteria necessary to support those uses. Water quality criteria include quantitative set concentrations, levels, or loading rates of constituents—such as pesticides, nutrients, salts, suspended sediment, and fecal coliform bacteria—or narrative statements that represent the quality of water that supports a particular use.

On May 25, 2023, the U.S. Supreme Court issued a ruling on *Sackett et ux. v. Environmental Protection Agency et al.*(598 U.S. ___ [2023]) that limits the jurisdiction of the CWA. Under this ruling, the U.S. Supreme Court held that the CWA's use of "waters" under Section 1362(7) refers only to "geographic[al] features that are described commonly as "streams, oceans, rivers, and lakes" and to adjacent wetlands that are "indistinguishable" from those bodies of water due to continuous surface connection. Specifically, under this ruling, to assert jurisdiction, a party must establish "first, that the adjacent 'body of water constitutes'…'water[s]' of the United States (i.e., a relatively permanent body of water connected to traditional interstate navigable waters); and second, that the wetland has a continuous surface connection with that water, making it difficult to determine where the 'water' ends and the 'wetland' begins."

Clean Water Act, Section 303, List of Water Quality Limited Segments

Section 303 of the CWA requires that the state adopt water quality standards for surface waters. When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a TMDL must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

Clean Water Act, Section 402, National Pollutant Discharge Elimination System

Direct discharges of pollutants into waters of the U.S. are not allowed, except in accordance with the NPDES program established in Section 402 of the CWA. Non-point source discharges to stormwater are regulated under stormwater NPDES permits for municipal stormwater discharges, industrial activities, and construction activities. These permits require development and adherence to Storm Water Pollution Prevention Plans (SWPPP).

Clean Water Act, Sections 401, Water Quality Certification

Section 401 of the CWA requires that an applicant for any federal permit obtain certification from the state, requiring the discharge to waters of the U.S. would comply with provisions of the CWA and with state water quality standards. For example, under Section 401 of the CWA, the SWRCB must certify all activities requiring a Section 404 permit.

Clean Water Act, Section, 404, Discharge of Dredged or Fill Material

Section 404 of the CWA, establishes a program to regulate the discharge of dredged or fill material into waters of the U.S., as defined by the CWA. Under Section 404, individual permits are reviewed by the United States Army Corps of Engineers (USACE).

FEMA National Flood Insurance Program

The National Flood Insurance Program offers flood insurance to homeowners, renters, and business owners if their community participates in the program. Participating communities agree to adopt and enforce ordinances that meet or exceed FEMA requirements to reduce the risk of flooding. Development in floodplain areas is subject to the standard conditions of approval of the Flood Control District, and the requirements and development standards set forth in the County Flood Plain Management Ordinance (Chapter 15-A of the County Code) and the Development Along Water Courses Ordinance (Chapter 15-B of the County Code).

Federal Antidegradation Policy

The Federal Antidegradation Policy (Title 40 Code of Federal Regulations Section 131.12) requires states to develop statewide antidegradation policies and identify methods for implementing them. Pursuant to the Code of Federal Regulations, state antidegradation policies and implementation methods shall, at a minimum, protect and maintain: 1) existing in-stream water uses; 2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and 3) water quality in waters considered an outstanding national resource.

3.9.3.2 State

State Water Resources Control Board

The California Environmental Protection Agency (CalEPA) is charged with developing, implementing, and enforcing the state's environmental protection laws. The SWRCB and nine Regional Water Quality Control Boards (RWQCBs) – including the Central Coast RWQCB – operate under the regulatory

authority of the USEPA. The SWRCB, a branch of CalEPA, and the RWQCBs have the responsibility of granting NPDES permits for certain point source discharges. California issues NPDES permits to selected point source dischargers and issues either waste discharge requirements or conditioned water quality certification for other discharges. The RWQCBs also regulate CWA activities and issue water quality certifications and permits for those regulated activities.

California Water Code

The California Water Code includes 22 kinds of districts or local agencies with specific statutory provisions to manage surface water. Many of these agencies have statutory authority to exercise some forms of groundwater management. For example, a Water Replenishment District (California Water Code Section 60000 et seq.) is authorized to establish groundwater replenishment programs and collect fees for that service, while a Water Conservation District (California Water Code Section 75500 et seq.) can levy groundwater extraction fees. Through special acts of the Legislature, 13 local agencies have been granted greater authority to manage groundwater. Most of these agencies, formed since 1980, have the authority to limit export and control some in-basin extraction upon evidence of overdraft or the threat of an overdraft condition. These agencies can also generally levy fees for groundwater management activities and for water supply replenishment.

Porter-Cologne Water Quality Control Act

The CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources, with the individual states; however, it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Act, which grants the SWRCB and RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

California Toxics Rule

The USEPA has established numeric water quality criteria for certain toxic substances in California via the California Toxics Rule. The California Toxics Rule establishes acute and chronic surface water quality standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the RWQCBs as having beneficial uses protective of aquatic life (23 priority toxics) or human health (57 priority toxics). Numeric criteria established in the California Toxics Rule are the same as those recommended by the USEPA in the CWA Section 304(a) guidance. the California Toxics Rule also includes provisions for compliance schedules to be issued for new or revised NPDES permit limits when certain conditions are met.

State Antidegradation Policy

In accordance with Federal Antidegradation Policy, the SWRCB adopted in Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality Waters in California (more commonly

referred to as the State Antidegradation Policy), which restricts the degradation of surface waters of the State and protects bodies of water where the existing water quality is higher than necessary for the protection of present and anticipated designated beneficial uses. The State Antidegradation Policy is implemented by the Central Coast RWQCB.

California Water Code Section 10933

California Water Code Section 10933(b) requires that DWR prioritize groundwater basins and subbasins for the purpose of implementing this section. In prioritizing the basins and subbasins, the department shall, to the extent data is available, consider all of the following:

1. The population overlying the basin or subbasin.
2. The rate of current and projected growth of the population overlying the basin or subbasin.
3. The number of public supply wells that draw from the basin or subbasin.
4. The total number of wells that draw from the basin or subbasin.
5. The irrigated acreage overlying the basin or subbasin.
6. The degree to which persons overlying the basin or subbasin rely on groundwater as their primary source of water.
7. Any documented impacts on the groundwater within the basin or subbasin, including overdraft, subsidence, saline intrusion, and other water quality degradation.
8. Any other information determined to be relevant by the department, including adverse impacts on local habitat and local streamflows.

California Water Code Section 13260

California Water Code Section 13260 requires that any person discharging or proposing to discharge waste that could affect the quality of the waters of the State, in a location other than the community sewer system, must submit a report of the waste discharge with the applicable RWQCB.

Central Coast Regional Water Quality Control Board

Central Coast Basin (Basin Plan)

The Central Coast RWQCB has adopted a Water Quality Control Plan for the Central Coastal Basin (Basin Plan) for its region of responsibility, which includes the County of Santa Barbara. The RWQCB has delineated water resource area boundaries based on hydrological features. For purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the hydrologic areas described in the Basin Plan. The Basin Plan also establishes implementation programs to achieve water quality objectives to protect beneficial uses and requires monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State Antidegradation Policy (SWRCB Resolution No. 68-16) described above.

Beneficial uses for surface water and groundwater are divided into 23 standard categories which include municipal and domestic supply, agricultural supply, industrial process supply, groundwater recharge, and water recreation.

The Basin Plan has established narrative and numeric water quality objectives that, in the Regional Board's judgment, are necessary for the reasonable protection of beneficial uses and the prevention of nuisances. If water quality objectives are exceeded, the RWQCB can use its regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters.

~~Central Coast Post-Construction Stormwater Requirements~~

~~The Central Coast Post-Construction Stormwater Requirements (Resolution R3-2013-0032) is intended to ensure that development projects that require approvals and/or permits issued by the County's planning or building departments reduce pollutant discharges to the maximum extent practicable and prevent stormwater discharges from causing or contributing to a violation of receiving water quality standards. The Post-Construction Stormwater Requirements apply to all new development or redevelopment projects that create and/or displace equal to or greater than 2,500 square feet (sf) of impervious surface. Performance requirements include site design, runoff reduction, water quality treatment, stormwater control plans, runoff retention, peak flow management, and other special circumstances to be implemented as part of the project.~~

NPDES 2022 ~~(~~Construction Stormwater General Permit~~)~~

The SWRCB regulates stormwater runoff from construction activities sites because of its potential to mobilize pollutants and discharge into waterbodies or watersheds. ~~under Order No. 2009-009-Division of Water Quality (DWQ), as amended by 2010-0014-DWQ and 2012-0006-DWQ. Construction activities subject to the NPDES Construction General Permit include sites that disturb an area of one acre or more, and small construction sites less than one acre but part of a larger common plan of one acre or more.~~ The SWRCB regulates stormwater discharges from construction sites because of its potential to mobilize pollutants and discharge into waterbodies or watersheds. Construction activity subject to the requirements of the permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities.

The Order requires that, prior to beginning any construction activities, the applicant must obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent and an adequate SWPPP. The SWPPP has two major objectives: 1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and 2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges. Required elements of a SWPPP include 1) site description addressing the elements and characteristics specific to the site; 2) descriptions of BMPs for erosion and sediment controls; 3) BMPs for construction waste handling and disposal; 4) implementation of approved local plans; 5) proposed post-construction controls, including a description of local post-construction erosion and sediment control requirements; and 6) non-stormwater management. Additionally, the SWPPP must contain a visual monitoring program, a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs, and a sediment monitoring plan if the site discharges directly to a water body listed on the CWA Section 303(d) List for sediment.

Sustainable Groundwater Management Act

SGMA went into effect on January 1, 2015, and encourages local agencies to work cooperatively as GSAs to manage groundwater resources and is intended to increase local control and protection over groundwater basins. This legislation intends to manage the use of groundwater in a manner that can be maintained long-term without causing the chronic lowering of groundwater levels, overdraft, a significant reduction in groundwater storage, saline water intrusion, or subsidence. SGMA requires the GSAs to develop GSPs for medium- and high-priority groundwater basins. The GSPs are required to set objectives to achieve sustainability within 20 years of plan implementation, report data to DWR, mitigate overdraft and address groundwater-dependent ecosystems.

California Fish and Game Code

Applicable sections of the California Fish and Game Code include Section 2050 (California Endangered Species Act), Section 5650 (prohibits water pollution), Section 5652 (prohibits refuse disposal in or near streams), Section 5901 (prohibits any device that impedes fish passage), and Section 5937 (requires sufficient water bypass and fish passage, relating to dams).

3.9.3.3 Local

Santa Barbara County Comprehensive Plan

The County's Comprehensive Plan addresses the conservation of water resources in the county, including the coastal area, inland area, and community plan areas. Project consistency with the Comprehensive Plan is discussed in Section 3.10, *Land Use and Planning*. The Conservation Element includes the Water Resources Section, which provides direction for the conservation, development, and utilization of water resources. As part of this effort, the County is directed to consider water resources during the permitting process. The Conservation Element provides the following recommendations:

- The County and the cities should support the Regional Water Quality Control Board in its establishment of discharge requirements for point source waste discharges, in order to protect surface and groundwater supplies.
- Use of streams from which groundwater recharge takes place should be regulated to ensure that the recharge capability of the channels is not impaired.
- Land use and development upstream from surface reservoirs should be regulated and monitored by the County Department of Public Works and the County Planning Department in order to minimize the production of water-polluting wastes.
- The County should initiate a study of land development in areas relying on septic tanks to assess the impact of alternate densities on water quality.
- On the basis of the adopted Water Quality Control Plan for the Central Coastal Region, the County and the cities should review their policies for protection of local water resources to determine what changes may be necessary.

The Seismic Safety and Safety Element profiles the goals, policies, objectives, and implementation measures adopted by the County to limit the negative effects of flooding and demonstrate compliance with applicable state laws.

Flood Goal 1: Protect the community from unreasonable risks of flooding pursuant to Government Code §65302(g) et seq.

Flood Objective 1: Pursuant to County Code Chapter 15A-Flood Plain Management, promote the public, health, and general welfare, and minimize public and private losses due to flood conditions.

Flood Policy 1: The County shall avoid or minimize risks of flooding to development through the development review process pursuant to Government Code §65302(3)(g)(2)(i).

Flood Policy 2: The County shall evaluate whether development should be located in flood hazard zones and identify construction methods or other methods to minimize damage if development is located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(ii).

Flood Policy 3: The County shall maintain the structural and operational integrity of essential public facilities during flooding pursuant to Government Code §65302(3)(g)(2)(iii).

Flood Policy 4: The County shall locate, when feasible, new essential public facilities outside of flood hazard zones, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities, or identify construction methods or other methods to minimize damage if these facilities are located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(iv).

Flood Policy 5: The County shall establish cooperative working relationships among public agencies with responsibility for flood protection pursuant to Government Code §65302(3)(g)(2)(v).

Flood Policy 6: The County shall review current National Flood Insurance Program maps and state and local sources of information on a regular basis and utilize the data to assure that measures are taken to reduce potential risks from flooding pursuant to the National Flood Insurance Program of 1968.

Flood Policy 8: The County Public Works Department should continue working with the SBCOEM in updating flood information in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan.

Flood Policy 9: The County shall utilize information on areas included in wildfires to determine areas subject to increased risk of flooding, including mudslides and flash flooding.

Flood Policy 10: The County should review the floodplain improvement projects identified in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan annually for progress and necessary revisions.

Flood Policy 11: The SBCOEM shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.

Flood Policy 12: The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from flood-related activity to property and lives.

Santa Barbara County Code

Chapter 14 – Grading Code

Chapter 14 of the Santa Barbara County Code (County Code) contains the Santa Barbara County Grading Code which includes regulations and conditions designed to control the design, construction, quality of materials, location, and maintenance of grading, drainage, erosion, and sediment control within the county. Extensive operations are subject to the minimum standards and procedures provided in the code. The grading ordinance generally requires a grading permit and an Erosion and Sediment Control Plan for all new grading, excavations, fills, cuts, borrow pits, stockpiling, compaction of fill, and land reclamation projects on privately owned land where the transported amount of materials exceeds 50 cubic yards, or the cut or fill exceeds three feet in vertical distance to the natural contour of the land. The County will accept a SWPPP in lieu of an Erosion and Sediment Control Plan if the SWPPP contains the requirements.

Chapter 15A – Floodplain Management

Chapter 15A of the County Code establishes prohibitions and/or standards for construction in all Special Flood Hazard Areas within the county to promote public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas mapped on the FIRMs. This chapter addresses standards for the construction of new development, including standards for the anchoring of structures, approved construction materials and methods, approved elevation of structures and floodproofing requirements, standards for utilities, standards for subdivisions, standards for manufactured homes, and standards for recreational vehicles.

Chapter 15B – Development Along Watercourses

Chapter 15B of the County Code provides controls on development adjacent to watercourses. The goals of the controls are to prevent damage from flood waters, prevent development on parcels from causing detrimental impacts downstream in the event of a flood event, and protect public health, safety, and welfare. Development standards included in Chapter 15B state that development shall not occur within 50 feet of the bank of a watercourse.

Chapter 24-7 – Offenses – Miscellaneous

Chapter 24 Section 24-7 of the County Code prohibits the construction of any building or structure that would obstruct or divert the natural flow of water in a stream, creek, or other watercourse.

Chapter 29 – Storm Drains and Sanitary Sewers

Chapter 29 Article IV of the County Code states that no person shall discharge or cause to be discharged into the storm drain system any materials, including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than stormwater. The code also states that no person shall throw, deposit, leave, maintain, keep, or permit to be thrown, deposited, left, or maintained in or upon any public or private property, driveway, parking area, street, road, alley, sidewalk, component of the storm drain system, any refuse, rubbish, garbage, litter, or other discarded or abandoned objects, and accumulations, so that the same may cause or contribute to pollution. Wastes deposited in proper waste receptacles for routine collection are exempted from this prohibition. Stormwater discharges are enforced by the County Public Works Department.

Santa Barbara County Integrated Regional Water Management Program

The County's IRWM Program was developed in response to the State of California's IRWM program, and it shares the state's visions of IRWM as a collaborative effort to manage all aspects of water resources in a region. The County's IRWM intends to promote and practice integrated regional water management strategies to ensure sustainable water uses, reliable water supplies, better water quality, environmental stewardship, efficient urban development, and protection of agricultural and watershed awareness.

Santa Barbara Countywide Integrated Stormwater Resource Plan

The SWRP was developed for the SWRP Cooperating Entities (Cities of Buellton, Carpinteria, Goleta, Guadalupe, Solvang, County of Santa Barbara, Carpinteria Valley Water District, Montecito Water District, and the University of California, Santa Barbara) to identify and prioritize stormwater and dry weather runoff capture projects that provide multiple benefits, including to water quality, water supply, flood management, the environment, and community. To satisfy the Proposition 1 Stormwater Grants Program funding eligibility requirements, the SWRP includes all required and recommended elements per the Water Code and SWRP Guidelines. The SWRP will be submitted to the Santa Barbara County IRWM Group, thereby satisfying the Proposition 1 Stormwater Grants Program funding eligibility requirements.

County of Santa Barbara Project Clean Water~~Storm Water Management Program~~

The County of Santa Barbara Storm Water Management Plan (SWMP) has been prepared pursuant to SWRCB Water Quality Order No. 2003-005-DWQ, NPDES General Permit No. CAS0000004 Water Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit). The General Permit establishes certain unincorporated areas on the South Coast, in the Santa Ynez Valley, and Orcutt within the Santa Maria Valley where the County is responsible for water quality and storm drains and surface drainages. The goals of the SWMP are to:

1. Protect the health of the public and the environment,
2. Meet CWA mandates through compliance with the General Permit requirements and applicable regulations, and
3. Increase public involvement and awareness.

The SWMP describes BMPs that will reduce, control, or eliminate identified pollutants of concern.Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The SBCOEM prepared the MJHMP, which focuses on the assessment of identified risks and implementation of loss reduction measures to ensure critical County services and facilities survive a disaster. Among other topics, the plan covers risks associated with drought and water shortage, flood, and coastal erosion in the unincorporated areas of the county. Additionally, the Mitigation Plan (Chapter 7) of the MJHMP identifies numerous flood control, channel maintenance, and drought management mitigation actions for the Flood Control District and water agencies.

Long Term Supplemental Water Supply Alternatives Report

The Long Term Supplemental Water Supply Alternatives Report is not a policy document. The report was created to identify options for increasing water supplies available to meet long-term Santa Barbara County demands. To help refine potential groundwater recharge options, the report provides an analysis to determine areas with the highest potential for favorable groundwater percolation recharge by looking at existing groundwater basin storage potential and recharge zones. The analysis concluded that the Santa Maria, San Antonio, Cuyama, and Santa Ynez Upland basins have the greatest groundwater storage potential (>100,000 AF). The Lompoc Plain, Santa Rita Upland, Santa Ynez River Alluvium, Goleta, and Montecito basins had medium (10,000 - 100,000 AF) groundwater storage potential and the Lompoc Terrace, Buellton Upland, Santa Barbara, and Carpinteria basins had the lowest (<10,000 AF) potential.

The report also determined stormwater and surface water flows from the Sisquoc River, Carpinteria Creek, Santa Ynez River, and Cuyama River could potentially be diverted to groundwater recharge basins and recycled and/or imported. Water supplied from the City of Guadalupe, Cuyama Community Service District, Montecito Sanitary District, and Carpinteria Sanitary District could potentially be used for groundwater recharge.

3.9.4 Environmental Impact Analysis

This section discusses the potential hydrology and water quality impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed, where feasible and the residual impact after mitigation is determined.

3.9.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. For purposes of this Program EIR, implementation of the Project may have a significant adverse impact on hydrology and water quality if it would:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. result in substantial erosion or siltation on- or offsite;

   ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

   iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

iv. impede or redirect flood flows.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

County of Santa Barbara Environmental Thresholds and Guidelines

The following guidelines, taken from the County's *Environmental Thresholds and Guidelines Manual*, have been designated by the County to be used in conjunction with CEQA thresholds for the analysis of Project-related impacts on surface and stormwater quality. The assessment of impacts must account for construction-related impacts (i.e., vegetation removal, erosion, use of construction materials on the site, and staging of construction activities) and post-construction (or post-development) impacts (i.e., increases in impervious surfaces and increased runoff, entrainment of pollutants, and effects of discharges on aquatic habitats and biota). A significant water quality impact is presumed to occur if the project:

- Is located within an urbanized area of the county and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
- Increases the amount of impervious surfaces on a site by 25 percent or more;
- Results in channelization or relocation of a natural drainage channel;
- Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks, or wetlands;
- Is an industrial facility that falls under one or more categories of industrial activity regulated under the NPDES Phase I industrial stormwater regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);
- Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan, or otherwise impairs the beneficial uses5 of a receiving water body;
- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

Projects that are not specifically identified on the above list or are located outside of the "urbanized areas" may also have a project-specific stormwater quality impact. Stormwater quality impacts associated with these projects must be evaluated on a project-by-project basis for a determination of significance. The potential impacts of these projects should be determined in consultation with the county Water Agency, Flood Control Division, and RWQCB. The issues that should be considered are:

- Size of the development;

- Location (proximity to sensitive waterbodies, location on hillsides, etc.);
- Timing and duration of the construction activity;
- Nature and extent of directly connected impervious areas;
- Extent to which the natural runoff patterns are altered;
- Disturbance to riparian corridors or other native vegetation on or offsite;
- Type of stormwater pollutants expected; and
- Extent to which water quality BMP are included in the project design.

All projects determined to have a potentially significant storm water quality impact must prepare and implement a Storm Water Quality Management Plan (SWQMP) to reduce the impacts to the maximum extent practicable The SWQMP shall include the following elements:

- Identification of potential pollutant sources that may affect the quality of the discharges to storm water;
- Proposed design and placement of structural and non-structural BMPs to address identified pollutants;
- Proposed inspection and maintenance program; and
- Method of ensuring maintenance of all BMPS of the life of the project.

Implementation of BMPs identified in the SWQMP will generally be considered to reduce the storm water quality impact to a less than significant level.

An impact on the overuse of groundwater in an alluvial basin or other aquifer is considered significantly adverse if:

- The following alluvial basins are over-drafted by an AFY that exceeds the corresponding values:
  - Santa Ynez Uplands: 61 AFY
  - Buellton Uplands: 22 AFY
  - San Antonio: 23 AFY
  - Lompoc: 12 AFY
  - Santa Maria: 25 AFY
  - Cuyama: 31 AFY
  - Montecito: 4 AFY
  - Foothill: 4 AFY
  - Goleta North/Central: 2 AFY
- The amount of new pumpage in a consolidated rock aquifer would place the aquifer in a place of overdraft.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future

project-level siting and design details, as well as the timing of future residential development, are not known. As a result, the impact analysis provided below does not evaluate potential impacts on hydrology and water quality at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for lower- and moderate-income units. This programmatic analysis reviews potential impacts anticipated to be enabled under the Housing Element Update and considers whether these changes would directly or indirectly affect surface and groundwater quality, groundwater supply, drainage patterns, flood risk, and water quality management within unincorporated areas of the county.

Impacts on hydrology and water quality would be unique to individual residential and mixed use developments on specific sites. The sites inventory provided as part of the Housing Element Update indicates where housing developments may occur under the proposed Project and informs this environmental impact analysis. The impact assessment generally compares the location of potential housing sites within the hydrologic setting in the county. However, as noted above, a complete analysis of potential impacts is not possible as site-specific development plans and site-specific hydrological information are generally unavailable. Wherever possible, illustrative examples are provided to describe particular areas of the county (e.g., FEMA Special Flood Hazard Areas) where the implementation of the Housing Element Update could cause hydrologic and water quality impacts. GIS analysis is also employed to estimate the acreage associated with future housing development that may be affected by flooding hazards as mapped by FEMA.

Groundwater impacts are analyzed relative to current conditions and regulations under SGMA and applicable GSPs for local basins. The County's thresholds for groundwater impacts were prepared in 1992 prior to SGMA and current state requirements for the management of groundwater resources, the recent adoption of GSPs, or the adjudication of the Santa Maria Valley and Goleta groundwater basins. As a result, the County's numerical thresholds for determining if a project would result or contribute to overdraft conditions are largely outdated. Therefore, the analysis of potential impacts on local groundwater basins is primarily based on current overdraft conditions and sustainability criteria and thresholds of applicable GSPs. This is particularly true when discussing the potential impacts of the Carpinteria, Santa Ynez River Valley, the San Antonio Creek Valley, and Cuyama Valley groundwater basins, which are regulated under SGMA and have adopted or draft GSPs, as well as the Goleta and Santa Maria River Valley groundwater basins which are adjudicated. However, where the County thresholds may still be relevant or informative to the analysis of potential impacts for other groundwater basins in the County, a comparison of potential demand for groundwater supplies generated by the proposed Project to the County's thresholds for the relevant groundwater basin is presented.

The information in this section is based on the 2016 Central Coast RWQCB Water Quality Control Plan for the Central Basin Plan, the 2019 Final IRWM Plan, the Santa Barbara County 2022 Groundwater Basins Summary Report, the Santa Barbara County 2020 Hydrology Report, the 2015 FEMA Flood Insurance Study of Santa Barbara County, the 2023 MJHMP, available GSPs for local groundwater basins, and regional information available in previous EIRs prepared by the County, among other sources.

3.9.4.2 Project Impacts

Table 3.9-5 below provides a summary of hydrology and water quality impacts resulting from the Project. A detailed discussion of each impact follows.

Table 3.9-5. Summary of Hydrology and Water Quality Impacts

Hydrology and Water Quality Impacts	Impact Classification	Mitigation Measure	Residual Significance
Impact HWR-1 The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Insignificant	None required	Insignificant impacts
Impact HWR-2. The proposed Project would decrease groundwater supplies, interfere substantially with groundwater recharge, or impede sustainable groundwater management of local groundwater basins.	Potentially significant	No mitigation feasible	Significant and unavoidable impacts
Impact HWR-3. The proposed Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces.	Potentially significant	MM HWR-1 (Flood Hazard Development Standards)	Significant but mitigable impacts
Impact HWR-4. The proposed Project would not substantially increase the risk of release of pollutants in the event of inundation by flood hazards, tsunamis, and seiche.	Insignificant	None required	Insignificant impacts
Impact HWR-5. The proposed Project would potentially conflict with or obstruct the implementation of a water quality control plan.	Potentially significant	No mitigation feasible	Significant and unavoidable impacts
Cumulative Impacts	Potentially significant	MM HWR-1 (Flood Hazard Development Standards)	Significant and unavoidable impacts

Impact HWR-1. The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Construction

The proposed Project has the potential to result in significant earthwork associated with future housing development enabled under the Housing Element Update, including the potential demolition of any existing pavements and structures, removal of vegetation, and excavation, grading, and trenching, which would disturb the underlying soils and expose them to potential erosion and mobilization from wind, rain, and onsite watering activities. These activities could result in sediment transport into nearby storm drain inlets or creeks and drainages discharging into larger surface water bodies, such as Atascadero Creek, Maria Ygnacio Creek, and Orcutt Creek – particularly during storm events or during onsite watering – where housing sites are located nearby, resulting in the degradation of surface water quality. Impacts on groundwater quality from the proposed Project would occur if contamination was introduced to groundwater basins during construction activities (e.g., release of contaminants that could percolate and enter the water table). Groundwater quality impacts could occur where the development of housing units introduces pollutants into groundwater

that threaten the identified beneficial uses of these subsurface water supplies. Additionally, construction activities have the potential to contribute to polluted stormwater runoff due to the delivery, handling, and/or storage of construction materials and wastes, as well as potential leakage and spills of construction materials (e.g., oil, grease, paints, solvents, or cleaning agents) (Section 3.8, *Hazards and Hazardous Materials*).

New developments at previously undeveloped (i.e., vacant) or agricultural sites, particularly those adjacent to creeks or drainages, are especially at risk of creating stormwater runoff and sedimentation that could affect the quality of receiving surface waters or groundwater basins. In particular, multiple sites near one another and located along the same creek corridor could collectively contribute to degraded water quality conditions if site hydrology is not managed during construction and/or operation to prevent contamination from running off the site. For example, potential Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3) located along Atascadero Creek on the South Coast and Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) located along Orcutt Creek in the Santa Maria Valley would likely result in extensive soil disturbance from construction activities. In addition, the potential for sediment loading would be higher from construction and associated grading on sites with steep slopes, such as Rezone Site No. 11 (Glen Annie), located in the foothills of the Santa Ynez Mountains on the South Coast. Because the proposed Project would involve activities throughout the HMAs of the county, impacts on water resources have the potential to be greatest where housing development sites are clustered in areas with connects to creeks and groundwater (i.e., the South Coast and Santa Maria Valley watersheds).

Future housing development enabled by the proposed Project would adhere to local, state, and federal regulations pertaining to water quality standards, as applicable. ~~This includes compliance with the County's SWMP, which requires the incorporation of measures to control construction site runoff, the California Green Building Standards Code, which requires the incorporation of BMPs for materials and waste storage, handling, equipment maintenance, vehicle maintenance, and fueling to reduce the potential discharge of polluted runoff from construction sites. Further, future developments enabled under the proposed Project that would disturb at least one acre would be required to adhere to the requirements of the NPDES Construction General Permit (SWRCB Order No. 2012-0006- DQA) to prepare and implement a SWPPP for construction activities. The SWPPP is required to identify BMPs that protect stormwater runoff and ensure avoidance of substantial degradation of water quality. A Notice of Intent would be filed with the RWQCB to comply with the requirements of the Construction General Permit.~~ Furthermore, all future residential development plans enabled by the proposed Project would be subject to the County's review of zoning, grading, and building permit applications. This would ensure compliance with the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, and Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers). Grading required to construct new site buildings would occur in accordance with the County's Grading Ordinance (County Code Chapter 14), which requires that if grading for a housing site exceeds one acre, the site would also be subject to <u>the</u> ~~a~~ NPDES <u>2022</u> General Construction Permit ~~from the RWQCB~~. The County's Grading Code may also require an Erosion and Sediment Control Plan for all new projects with 50 cubic yards or more of soil or if the cut or fill exceeds three feet in vertical distance to the natural contour of the land. As such, small-scale projects that do not require the preparation of a SWPPP (less than one acre) would still be subject to local regulation and review to ensure the protection of water quality. All projects determined to have a potentially significant storm water quality impact would be required to prepare and implement a SWQMP to reduce the impacts to the maximum extent practicable. (See Section 3.9.4.1, *Thresholds of Significance*, for the list of elements required in an SWQMP.)

Through compliance with the NPDES program and the County's policies and regulations to protect associated inland and coastal water quality, the potential development enabled by the proposed Project would be consistent with these applicable water quality control plans and standards.

Compliance with and the application of existing water quality regulations to future potential residential and mixed use projects enabled by the proposed Project would avoid dry and wet-weather runoff and erosion during construction-related activities. These requirements would substantially reduce or eliminate impacts on surface water quality from polluted runoff during construction. Therefore, impacts to water quality from potential future housing construction associated with the Housing Element Update would be *insignificant*.

Operation

Residential and mixed use development has the potential to introduce sediments or pollutants, such as nutrients, pesticides, sediment, debris, oxygen-demanding substances, oil and grease, and pathogens to storm water runoff, as well as to increase runoff from an increase in impervious surfaces, potentially contaminating surface waters and groundwater. The introduction of these pollutants into stormwater discharges could negatively impact the quality of surrounding watercourses. However, potential future development enabled by the Housing Element Update would be subject to the NPDES Municipal General Permit~~Municipal Stormwater NPDES Permit 2003-005-DWQ and the General Permit No. CAS0000004 Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4) permit~~. Compliance with the NPDES Municipal General Permit ~~and MS4 permits~~ for future residential development enabled by the Housing Element Update would ensure the degradation of water quality from operational impacts would remain minimal and below established threshold limits for water quality standards. ~~Further, in the case of land use regulation policies, BMPs incorporated to protect water quality in construction sites and post-construction activities have been adopted Countywide (e.g., SWMP, County Code Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers) and are applicable in the unincorporated areas countywide, regardless of whether they are included in the NPDES permit area. Additionally, future development of one acre or greater would be subject to the County's SWMP, which when implemented is expected to reduce pollutants discharged into receiving water bodies to the maximum extent practicable.~~

The operational risk of groundwater contamination is generally limited to sites where ground surfaces remain undeveloped and permeable. Development of impermeable surfaces (i.e., pavement, concrete) largely precludes pollutants from reaching groundwater and instead directs them to stormwater systems. Enclosed structures largely preclude the ability of pollutants to enter runoff, stormwater flows, or groundwater because operations are contained within the structure. The potential for groundwater contamination would be higher for development sites located near or adjacent to water bodies and overlying groundwater basins, such as sites near creeks extending from the Santa Ynez and Carpinteria foothills within South Coast (e.g., Rezone Site Nos. 1 [Giorgi], 2 [St. Athanasius Church], 4 [Ekwill], 5 [Caird 1], 6 [Caird 2], 7 [Caird 3], and 12 [St. Vincent's – East]) or along Orcutt Creek in the Santa Maria Valley (e.g., Rezone Site No. 22 [Key Site 11] and No. 23 [Key Site 12]). Because the proposed Project would result in future new development, redevelopment, or infill development in distributed sites across the county, potential impacts to groundwater resources would occur in all nine groundwater basins. Additionally, multiple sites near one another (e.g., located along the same creek corridor) could collectively contribute to degraded groundwater quality conditions if site hydrology is not managed to prevent contamination from percolating. Potential impacts to groundwater resources would likely occur within local watersheds where proposed

development sites are clustered, particularly within the South Coast and Santa Maria Valley watersheds, where potential future housing units are located near each other.

As described above, the County reviews permit applications to ensure compliance with the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance (Ord. No. 4766, 11-9-2010), Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), and the ~~County's SWMP~~NPDES Municipal General Permit, if applicable. Further, the County's Storm Drains and Sanitary Sewers Code requires all new development and redevelopment to comply with the RWQCB's Resolution No. R3-2013-0032, Post-Construction Stormwater Management Requirements which constitutes minimum requirements needed to protect water quality from stormwater impacts caused by development. With the implementation of state and local requirements, future housing development enabled by the Housing Element Update would not violate any water quality standards or waste discharge requirements, or otherwise degrade surface waters or groundwater for the operational phase, and impacts would be *insignificant*.

Impact HWR-2. The proposed Project would potentially decrease groundwater supplies, interfere substantially with groundwater recharge, or impede sustainable groundwater management of local groundwater basins.

Decrease in Groundwater Supplies

Impacts from the proposed Project could occur where the housing development enabled by the Housing Element Update would unsustainably draw groundwater resources or inhibit groundwater recharge. As described in Section 3.9.2.2 *Groundwater*, groundwater supplies account for nearly 75 percent of the county's total potable water supply and serve as irrigation water and potable water for much of agricultural lands and development located outside of water service areas. Future housing development enabled under the proposed Project would increase demand for and pumping of groundwater in all groundwater basins, especially in the Carpinteria, Montecito, Santa Barbara, Foothill, Goleta, and Santa Maria Valley Groundwater Basins, where development would be concentrated. Section 3.15, *Utilities and Water Supplies* presents a detailed analysis of potential increases in demand for domestic water supplies with the proposed Project, which includes consideration of increases in demand for groundwater supplies used for domestic uses. Based on this analysis of water demand, it is foreseeable that the proposed Project would substantially increase groundwater drawn for domestic purposes as a result of development enabled under the Housing Element Update. For example, Program 1, Title, includes the Housing Element Update's potential rezone program (Potential Rezone Program), which substantially increases the potential capacity for residential and mixed use development on a number of housing sites. This program would contribute to increased groundwater demand as a result of higher population densities within existing groundwater basins in the county.

Based on the sites inventory prepared for the Housing Element Update, the potential for development to overlie groundwater basins and recharge areas would be greatest in the Santa Maria Valley Groundwater Basin (e.g., Orcutt area) and the Goleta Groundwater Basin (e.g., Eastern Goleta Valley area). Both of these groundwater basins are adjudicated, which limits the amount of groundwater available to water rights holders (e.g., water service agencies) in the basin. Orcutt is served by the Golden State Water Company-Orcutt, which falls within the boundary of this adjudication. Development in the Eastern Goleta Valley would be served by the Goleta Water District. discussed in Section 3.15, *Utilities and Water Supplies,* the Golden State Water Company has an adjudicated supply

of groundwater that would be adequate to serve future development enabled by the Housing Element Update, and implementation of the Housing Element Update is not anticipated to substantially decrease groundwater supplies in this area. In the Eastern Goleta Valley, groundwater makes up approximately 34~~14~~ percent of the domestic water supply of the Goleta Water District. The Goleta Water District's groundwater supply is limited to its adjudication, appropriative right to extract, and use of up to 2,350 AFY. Future housing development enabled by the proposed Project would not increase demand for groundwater supplies beyond the Goleta Water District's adjudication and would therefore not result in substantial increases in demand for groundwater supplies such that supplies would be substantially decreased.

Potential housing sites in the sites inventory prepared for the Housing Element Update also overlie the Carpinteria, Montecito, Santa Barbara, and Foothill groundwater basins in the South Coast. The Santa Barbara and Foothill basins are designated as very low-priority basins, while the Montecito and Carpinteria basins are designated as medium- and high-priority, respectively. The County has established a threshold of 4 AFY of additional groundwater pumping for determining whether a project would contribute to overdraft conditions for the Montecito and Foothill groundwater basins. The County has not established any thresholds for the Carpinteria or Santa Barbara groundwater basins. As described in Section 3.15, *Utilities and Water Supply,* residential and commercial development enabled under the Housing Element Update has the potential to generate an additional demand for 2,899.94 AFY of water supplies within the South Coast; however, the vast majority of this demand is attributed to development of potential rezone sites and vacant sites located outside of the Montecito and Foothill groundwater basins. Further, the Carpinteria, Montecito, Foothill and Santa Barbara groundwater basins, as well as the potential housing sites overlying these basins, are located in areas of the county served by water service agencies whose water supply is provided largely from non-groundwater sources. As a result, the proposed Project is not anticipated to result in substantial increases in demand for groundwater supplies from the Santa Barbara, Foothill, Montecito, and Carpinteria basins such that supplies would be substantially decreased, nor is development within the Montecito and Foothill basins anticipated to generate an additional 4 AFY of demand for groundwater supplies which is considered by the County to result in potential overdraft of the basins.

Future housing development would also overlie the high-priority Cuyama Valley, medium-priority San Antonio Creek Valley, and medium-priority Santa Ynez River Valley groundwater basins. Groundwater makes up the vast majority of the domestic water supply in each of these overlying areas, with Cuyama Valley entirely reliant on its groundwater supply to meet water demand. As described in Section 3.9.2.2 *Groundwater*, current and future groundwater supply for groundwater basins subject to SGMA are managed by their respective GSAs and the programs and measurable objectives of the respective GSP. In these areas, sustainable management of groundwater supplies for domestic use is informed by projected increases in growth and domestic water demands based on regional growth forecasts. Within the San Antonio Creek Valley groundwater basin, sites identified in the Housing Element Update are located in the community of Los Alamos. These sites consist entirely of existing vacant sites, as well as Pending Project Site No. 48 (Price Ranch), which would be developed consistent with the existing zoning of the site. Development of these sites consistent with existing zoning would therefore occur consistent with the regional growth forecast and would not present a risk of substantially decreasing groundwater supplies or affecting the sustainable yield of the basin. However, for the Cuyama Valley and Santa Ynez River Valley groundwater basins, and as discussed in Section 3.12, *Population and Housing,* implementation of the Housing Element Update would exceed growth forecasts of these regions. As a consequence, water demand and groundwater pumping would substantially increase with population growth and could substantially decrease groundwater supply.

All future housing and mixed use development enabled by the proposed Project would be required to be designed and constructed in accordance with state and local codes regulating water efficiency. Project applicants/owners would be required to demonstrate that an adequate and approved water source is available for housing development via receipt of permission from appropriate agencies or owners of the rights to such water sources prior to issuance of a license under the proposed Project, pursuant to the SWRCB water rights. Limits to the availability of water from municipal sources or groundwater management agencies may limit the permits if a permittee cannot demonstrate an adequate source of water, including groundwater. Where surface and groundwater sources have not been adjudicated, receipt and demonstration of rights to such supplies would ensure that future development would not result in significant impacts on these supplies.

However, regulations may not be effective in fully avoiding impacts associated with the potential maximum buildout anticipated under the Housing Element Update. It is foreseeable that housing growth that occurs as a result of the proposed Project could exceed the capacity of groundwater supplies, especially in future multi-year drought conditions that maintain or exacerbate overdraft conditions due to the potential development of larger rezone sites (e.g., Rezone Site No. 35 [Chumash LLC] and No. 36 [Blue Sky Property]) that would be inconsistent with existing zoning, and therefore be inconsistent with regional growth projections. As such, these growth projections used to inform management of groundwater supplies for domestic use could change under the proposed Project and result in substantial increases in demand for and decreases in groundwater supplies, particularly from the Cuyama Valley and Santa Ynez River Valley groundwater basins. Therefore, impacts are considered *potentially significant.*

The only way to fully avoid the impacts on groundwater supply resulting from the implementation of the proposed Project would be to eliminate sites overlying the Cuyama Valley and Santa Ynez River Valley groundwater basins, thereby eliminating potential housing sites from consideration under the Housing Element Update. However, doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets. Therefore, impacts would remain *significant and unavoidable.*

Reductions in Groundwater Recharge

Groundwater recharge occurs where aquifers intersect with the permeable ground surface and from seepage losses of major streams, rainfall percolation, and subsurface inflow. Housing development enabled by the proposed Project could inhibit groundwater recharge when development occurs over previously vacant sites, effectively increasing impervious surface area, or when redevelopment on existing impervious surfaces alters surface area in such a way that stormwater flows are redirected in a way that obstructs recharge. Some potential housing sites identified in the Housing Element Update sites inventory are previously developed sites that are partially or entirely covered with impervious surfaces. As such, development at these sites would result in minor changes to groundwater recharge; infiltration may even be increased with the addition of new site landscaping. However, the development of currently vacant sites in the sites inventory would increase impermeable surfaces at the site. As described in Section 5.7.2.2, *Groundwater*, the major sources of groundwater recharge include built reservoirs, dams, and natural drainages, with agricultural return flow and treated wastewater percolation also contributing to recharge. Non-built recharge areas of groundwater basins are expansive and primarily found in the Rural Area away from potential housing sites identified in the Housing Element Update sites inventory. As such, implementation of the Housing Element Update is not anticipated to substantially interfere with the recharge of local groundwater basins. Additionally, *The Long Term Supplemental Water Supply Alternatives Report*

(2015) identified the Santa Maria, San Antonio, Cuyama, and Santa Ynez Upland basins as basins with the greatest storage potential for future recharge projects. Future development enabled by the Housing Element Update is not expected to interfere with potential recharge projects due to the expansive nature of recharge aquifers and the relatively small scale of potential housing sites. However, the Goleta Water District has identified recharge areas along the northern margin of the Goleta Groundwater Basin that are critical and the least constrained areas in terms of percolation of water into the primary aquifers of the basin. The southern portion of Rezone Site No. 11 (Glen Annie) is located within the West Subbasin Recharge Area and Pending Project Site No. 41 (MTD) is located entirely within the Central Subbasin Recharge Area.

Although new development enabled under the Housing Element Update would increase the area of impervious surfaces and could potentially impact groundwater recharge, particularly within the Goleta Groundwater Basin, new development ~~causing ground disturbance of one acre or greater~~ would be required to comply with the NPDES Municipal General Permit~~MS4 Permit; State Water Board Construction General Permit, as applicable;~~ and the Flood Control District's Standard Conditions of Project Plan Approval (Standard Conditions), which stipulate certain requirements for onsite surface retention and underground stormwater chambers depending on the size of the project to reduce post-development peak stormwater runoff and encourage groundwater recharge. Additionally, the County's compliance with state and local regulations (e.g., Clean Water Act, California Water Code, Basin Plan~~, SWMP~~) governing water quality would ensure that development projects use BMPs that would limit impacts where future projects enabled by the proposed Project have the potential to impact groundwater recharge. Therefore, the impacts of the Project related to the inhibition of groundwater recharge would be nominal and *insignificant*.

Impact HWR-3. The proposed Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces.

Increase in Erosion, Siltation, and Site Runoff

Construction of new development and changes in land use enabled under the proposed Project would increase impervious surfaces and involve site-preparation activities, such as demolition, excavation, grading, and trenching within areas that are currently vacant and sites currently developed with impervious surfaces. Construction of housing sites, particularly existing vacant sites with exposed soils, could result in a substantial alteration to the existing drainage patterns of a site. However, as discussed in Impact HYD-1, potential future development enabled by the Housing Element Update causing ground disturbance of one acre or greater would be required to comply with state and County stormwater management standards, such as the preparation of a SWPPP or Erosion and Sediment Control Plan to reduce onsite erosion and offsite siltation. Adherence to these standards and implementation of BMPs outlined in the SWPPP would ensure minimal stormwater runoff.

Additionally, post-construction period requirements under the RWQCB's Resolution R3-2013-0032 enforce stormwater management requirements to ensure reduced pollutant discharges and prevent stormwater discharges from causing or contributing to a violation of receiving water quality standards. Requirements include site design strategies to reduce site runoff, and the use of low-impact development techniques to result in no substantial increase in drainage offsite. These stormwater management measures and techniques are designed to reduce site runoff and allow infiltration or stormwater capture for reuse. Mandatory compliance with these existing regulations would ensure

future development enabled by the implementation of the Housing Element Update would not result in substantial increases in on- or offsite erosion or siltation, and impacts would be *insignificant*.

Decrease Stormwater Drainage System Capacity

As described in HWR-2 above, future development enabled by the Housing Element Update would increase impervious surfaces countywide, thereby potentially increasing stormwater runoff at future development sites. Substantial increases in stormwater runoff could exceed the capacity of existing stormwater drainage systems. However, all new development in County Special Flood Hazard Areas would be required to follow storm drain and drainage design requirements per County Code Chapter 15A, which requires drainage designs of new development to be sized for peak 25-year runoff events and 100-year storms, as well as requirements for onsite retention in compliance with NPDES. Prior to occupancy clearance, any development project that required additional conditions or requirements following the Flood Control District development review would be required to receive a Drainage Improvement Certification. With the implementation of these control measures and regulatory provisions to limit runoff from future new development sites, the proposed Project would not result in significant increases in runoff that would exceed the capacity of existing or planned storm drain facilities, and the impact is *insignificant*.

Increase Flooding On- or Offsite and Redirecting Flood Flows

The sites inventory provided as part of the Housing Element Update indicates where residential development may occur under the proposed Project. Based on GIS analysis of the sites inventory relative to FEMA flood hazards, it is estimated that up to 337.82 acres of potential residential uses would be zoned within an existing flood hazard area. Of the total acreage, 230.41 (68.2 percent) is located on the South Coast and largely associated with existing vacant sites located within Flood Zone D and Rezone Site Nos. 1 (Giorgi), 2 (St. Athanasius Church), 4 (Ekwill), 5 (Caird 1), 6 (Caird 2), 7 (Caird 3), and 12 (St. Vincent's – East). Approximately 16.27 acres (4.8 percent) on the South Coast include vacant sites located in coastal areas that are subject to coastal wave hazards (Zone VE). The remaining 10.7.41 acres (31.8 percent) are located in the North County, primarily in the Santa Maria Valley and Santa Ynez Valley regions. None of these North County potential housing sites are subject to coastal wave hazards. Table 3.9-6 summarizes the overlap between flood hazard zones and the housing sites identified in the Housing Element Update.

Future housing development and changes in land use associated with the Potential Rezone Program would result in increases in impervious surfaces, which in turn would increase stormwater runoff and discharges to drainage systems and the potential to cause flooding in areas without sufficient drainage facilities. As discussed in Impact HWR-1 and Impact HWR-2 above, ~~all~~ potential future development ~~causing one acre or greater of ground disturbance~~ would be required to comply with the applicable requirements of the ~~NPDES MS4 permit, the~~ NPDES 2022 Construction General Permit~~,~~ and the NPDES Municipal General Permit~~County's SWMP, and RWQCB's Resolution R3-2013-0032~~, among other regulations, which would minimize impervious surfaces at a site, capture stormwater onsite, decrease surface water flows, and slow runoff rates all of which would mitigate the potential for onsite and offsite flood flows associated with housing development. Further, future development in a flood hazard area would be required to comply with the County Code Chapter 15A, Floodplain Management, 15B Development Along Watercourses, and policies of the County's Seismic Safety and Safety Element. (See Section 3.9.3.2, *State* and Section 3.9.3.3, *Local.*) These regulatory standards are designed to ensure future development of a site reduces or addresses flood hazards and prevents or regulates the

construction of barriers that might unnaturally divert floodwaters or increase flood hazards in other areas.

Table 3.9-6. Summary of Housing Potential in Flood Hazard Areas

Housing Site Type by Flood Zone[1]	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Total Acres of Sites Inventory Affected by FEMA Flood Zones[1]					
Existing Vacant Sites	**162.09**	**0.28**	**54.10**	**13.38**	**3.23**
Floodplain (Zone AE)	*18.56*	*0.28*	*47.16*	*10.26*	--
100-Year (Zone A)	--	--	*6.94*	*2.13*	--
Floodplain (Zone AO)	--	--	--	*0.99*	*3.23*
Undetermined (Zone D)	*127.26*	--	--	--	--
Wave Hazard (Zone VE)	*16.27*	--	--	--	--
Rezones	**63.53**	**--**	**16.96**	**1.76**	**10.88**
Floodway (Zone AE)	*61.15*	--	*16.96*	*1.76*	--
100-Year (Zone A)	*2.38*	--	--	--	--
Floodplain (Zone AO)	--	--	--	--	*10.88*
Pending Projects	**4.79**	**--**	**--**	**5.85**	**1.06**
Floodplain (Zone AE)	*4.79*	--	--	*5.85*	--
Floodplain (Zone AO)	--	--	--	--	*1.06*
Total by HMA	**230.41**	**0.28**	**71.06**	**20.99**	**15.17**
Floodplain (Zone AE)	*84.50*	*0.28*	*64.12*	*17.78*	--
100-Year (Zone A)	*2.38*	--	*6.94*	*2.13*	--
Floodplain (Zone AO)	--	--	--	*0.99*	*15.17*
Undetermined (Zone D)	*127.26*	--	--	--	--
Wave Hazard (Zone VE)	*16.27*	--	--	--	--
Total by RHNA Region	**230.41**	**107.41**			
Floodplain (Zone AE)	*84.50*	*82.18*			
100-Year (Zone A)	*2.38*	*9.07*			
Floodplain (Zone AO)	--	*16.16*			
Undetermined (Zone D)	*127.26*	--			
Wave Hazard (Zone VE)	*16.27*	--			
Total Unincorporated County	**337.82**				
Floodplain (Zone AE)	*166.68*				
100-Year (Zone A)	*11.45*				
Floodplain (Zone AO)	*16.16*				
Undetermined (Zone D)	*127.26*				
Wave Hazard (Zone VE)	*16.27*				

[1] Acreage only shown for zones in which sites are located.

Despite existing regulations that would serve to reduce site runoff and address flooding, several potential housing sites are located in areas subject to several flooding constraints. For example, the

majority of potential Rezone Site No. 22 (Key Site 11) in Orcutt is mapped within the 100-year floodplain for Orcutt Creek. Under the Housing Element Update, Rezone Site No. 22 (Key Site 11) could be developed with a potential of 945 new residential units and 32,670 sf of commercial development based on proposed site zoning. Given the amount of potential future development enabled under the Housing Element Update and the severe flood constraints of Rezone Site No. 22 (Key Site 11), it is reasonable to assume that the proposed development could not feasibly be accommodated within the existing unconstrained portions of this site. Similar cases may also exist for other potential housing sites within the county, such as Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3), which are similarly constrained by flood hazards along Atascadero and Maria Ygnacio creeks. In addition, sites in the Eastern Goleta Valley are potentially exposed to additional hazards through coastal wave hazards [2]which could combine with flooding from large rain events to further exacerbate flood risk. These risks may only worsen in future years due to the ongoing effects of climate change and sea level rise. As a result, the development of potential housing sites as enabled under the Housing Element Update may not be able to feasibly accommodate existing site constraints along with existing development standards applicable to Special Flood Hazard Areas in a manner that would facilitate a reasonable amount of development under the Housing Element Update. To accommodate a reasonable degree of development on a flood-constrained site and reduce flooding onsite, development may be required to alter site elevations or modify creek channels and floodways in a manner that could result in the redirection of flood flows or increase flooding offsite. Therefore, impacts are considered *potentially significant.*

Implementation of **MM HWR-1 (Flood Hazard Development Standards)** would require that multifamily housing projects that are proposed on potential County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law ~~and which are located on sites affected by special flood hazards~~ comply with the design requirements listed in the most recently adopted Flood Control District's Standard Conditions for Project Plan Approval. These standard conditions would require that all development complies with applicable requirements of Chapters 15A, 15B, and 24-7 of the County Code, prepare site plans showing existing mapped special flood hazards, and as applicable, mitigate flood risks, site runoff, and onsite and offsite flooding through modification of the site and implementation of special improvements. To demonstrate flood risks, site runoff, and on- and offsite flooding are appropriately mitigated, potential future sites may be required to prepare a project-specific Hydrologic/Hydraulic Analysis prepared by a California-licensed civil engineer to identify necessary drainage improvements. Any required future grading and improvement plans must depict all improvements necessary to mitigate, including but not limited to detention basins, storm drain improvements, and culvert upgrades, and must depict the modified flood hazard areas.

With the implementation of **MM HWR-1 (Flood Hazard Development Standards)**, as well as required compliance with existing regulations, impacts would be *significant but mitigable.*

[2] Wave action and high winds that can cause damage during a flood event.

Impact HWR-4. The proposed Project would not substantially increase the risk of release of pollutants in the event of inundation by flood hazards, tsunamis, and seiche.

In addition to traditional FEMA flood hazards described in Impact HWR-3 above and presented in Table 3.9-6, other forms of flooding that may impact future housing development include potential housing sites located within coastal areas susceptible to tsunami, and areas downstream of reservoirs and lakes that could be susceptible to flooding due to seiche. Tsunami hazard zones in Santa Barbara County are generally located no more than 1 mile from the coastline. Housing sites identified by the Housing Element Update that are most susceptible to tsunami inundation most commonly occur in the South Coast Region in the Carpinteria Valley, where areas of mapped tsunami inundation can extend as far inland as U.S. Highway 101. Seven existing vacant potential housing sites identified in the sites inventory prepared for the Housing Element Update are located within tsunami inundation zones. These sites include one site on Beach Club Road, two sites on Padaro Lane, four sites on Santa Claus Lane, and one site on Sand Point Road, Additionally, a portion of Pending Project Site No. 43 (Miramar) is also mapped within the tsunami inundation zone.

Further, the County's MJHMP identified 14 dams at risk of failure and associated dam inundation zones. Four potential housing sites identified by the Housing Element Update occur within dam inundation zones, including two existing vacant sites located along Laurel Canyon Road downstream from the Laurel Canyon Reservoir and Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) in the Carpinteria Valley. These areas could also be at risk of seiche if an earthquake causes waves to overtop dam walls. While the level of risk can be tempered by topography and development of the site, in the event of severe flooding, dam failure, tsunami, or seiche, these sites would create a risk of release of pollutants due to inundation.

As previously discussed, potential future development enabled by the Housing Element Update that is located within mapped flood hazard areas would be required to comply with flood management standards provided in County Code Chapter 15A, Floodplain Management, and 15B, Development Along Watercourses. As stated therein, the County applies uniformly applicable regulations for increasing structural elevations and/or incorporating floodproofing measures, such as anchoring structures, using specific construction material, and requiring minimum setback from watercourses. Further, all new development facilitated under the Housing Element Update would adhere to the goals and policies of the County's Seismic Safety and Safety Element and the Flood Control District's Standard Conditions of Project Plan Approval (Standard Conditions), as applicable. Additionally, all potentially hazardous materials used during Project construction and operation would be required to be handled, used, and stored in accordance with the manufacturer's specifications and applicable health safety regulations. Compliance with these regulatory standards would protect communities and new development from flood risk and prevent pollutant release during a flood, tsunami, or seiche event from future development facilitated by the proposed Project. Therefore, impacts would be *insignificant.*

Impact HWR-5. The proposed Project would potentially conflict with or obstruct the implementation of a water quality control plan.

Water Quality Control Plans

County water quality control plans include the IRWM (Santa Barbara County IRWM Cooperating Partners 2019a)~~,~~ and the NPDES Municipal General Permit ~~SWMP, and SWRP~~ (Santa Barbara County

Cooperating Entities 2021). These plans include objectives to ensure the protection of water supplies and water quality. Under the NPDES Municipal General PermitSWMP, runoff must meet guidelines set by the SWRCB and implement BMPs that will reduce, control, or eliminate identified pollutants of concern. As described in HYD-1 applicable potential future development enabled by the proposed Project would be required to comply with the applicable requirements of the NPDES 2022 Construction General Permit (SWRCB Order No. 2003-005-DWQ) and the County's Storm Drain and Sanitary Sewers County Code (Chapter 29 Article IV) and the Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers) to protect against pollutants in water quality. Therefore, through compliance with the NPDES program and County Code, the proposed Project would be consistent with these applicable basin and water quality control plans and impacts would be *insignificant*.

Consistency with Groundwater Management Plans

Future housing development enabled by the Housing Element Update would overlay each of the nine groundwater basins in the County, including the following medium and high-priority basins, as defined by CEQA: Cuyama Valley, San Antonio Creek Valley, Santa Ynez River Valley, Carpinteria, and Montecito. All medium and high-priority basins except Carpinteria Valley have adopted GSPs governing the sustainable management of their respective groundwater resources. Carpinteria GSA released its draft in the Fall of 2023 and is anticipated to be adopted in 2024. As discussed in Impact HWR-2 above, these GSPs outline potential projects and management actions to help address basin overdraft and achieve sustainability of the basins' groundwater supplies. Prepared GSPs include future groundwater budgets which take into account regional growth forecasts to project future use of groundwater supplies for domestic use.

For example, the future water budget prepared by Montecito GSA assumes that the majority of buildable lots remaining in the Montecito Water District's survey area would be used for single-family and multifamily residences. As described in Section 3.15 *Utilities and Water Supply*, future residential development on these existing vacant lots would generate a nominal water demand for the Montecito Water District. Therefore, future water demand associated with the development of future housing enabled under the Housing Element Update would not exceed future water budgets and would not conflict with the Montecito GSP.

However, as previously discussed, future development enabled under the Housing Element Update would exceed the growth projections used to inform the management of groundwater supplies for the Cuyama Valley and Santa Ynez River Valley groundwater basins. For example, the projected water budget prepared in the Cuyama Basin GSP assumes no projected changes in land use or population in the basin (Cuyama Basin Groundwater Sustainability Agency 2022). However, the Housing Element Update would enable the development of a maximum of 1,845 new residential units within the Cuyama HMA, the majority of which is associated with Rezone Site No. 36 (Blue Sky Property), resulting in a population growth and water demand that exceeds the GSP's water budget. Similarly, the Santa Ynez River area is nearly entirely reliant on groundwater to supply water demand. As such, new residential development in these areas that exceed projected future water budgets would potentially conflict with the GSPs. Similar to the Montecito Water District, future housing development in the Carpinteria Valley Water District service area would involve ongoing development of single-family and smaller multifamily residences on existing vacant lots, which would generate a nominal water demand. However, the Housing Element Update would potentially involve rezoning of housing sites within the Carpinteria Valley Water District, which could substantially increase water demand beyond available supplies, particularly long-term and under drought

conditions. As such, future housing development enabled by the Housing Element Update could obstruct the management actions and sustainability strategies for these basins. Impacts are therefore considered *potentially significant.*

The only way to fully avoid the impacts resulting from conflicts with the GSPs and the Housing Element Update would be to eliminate sites overlying the Cuyama Valley, Santa Ynez River Valley, and Carpinteria groundwater basins, thereby eliminating potential housing sites from future development. However, doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets. Therefore, impacts would remain *significant and unavoidable.*

3.9.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of long-range plans, policies, and initiatives as well as development projects (housing and non-housing related) in the unincorporated county and surrounding incorporated cities. Project impacts along with potential impacts from past, pending, and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects, such as the Accessory Dwelling Unit (ADU) Ordinance Amendments (Cumulative Project No. 13) to incorporated cities in Santa Barbara County's 2023-2031 Housing Element Update (Cumulative Project No. 1 – 8) (Table 3-6).

The proposed Project would result in cumulatively considerable impacts if it in combination with other cumulative past, pending, and current plans and projects as described in the Section 3.0.6, *Cumulative Impact Analyses* (Tables 3-6, 3-7, and 3-8; Appendix I), would affect the same hydrologic environment. Included in the cumulative setting for the proposed Project is the housing element update for each of the eight incorporated cities within the county. Under each of these cumulative projects, each agency is planning for how to meet local housing needs and the RHNA plus the 15 percent buffer for lower- and moderate-income units assigned by the Santa Barbara County Association of Governments (SBCAG) by identifying potential sites for new housing development, potential sites for rezoning to residential uses, as necessary, and implementing a variety of programs that would encourage or facilitate new residential development. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units. Other cumulative planning efforts are listed in Section 3.0.6, *Cumulative Impacts Analyses*.

Cumulative impacts on water resources would occur as a result of cumulative countywide development that could increase stormwater runoff carrying pollutants that could infiltrate into the surface waters and water-bearing formations of the underlying groundwater basin, affecting the quality of groundwater resources. While it is not possible to estimate the surface and groundwater quality impacts of individual residential development projects, it is reasonably foreseeable that construction projects in the county could occur proximate to one another with sometimes concurrent or overlapping schedules, introducing water pollutants and altering drainage patterns to the same areas. All new development disturbing one or more acres of ground would be required to adhere to existing stormwater management requirements, such as the County's Storm Drain and Sanitary Sewers County Code (Chapter 29 Article IV) and the NPDES Municipal General Permit, ~~County of Santa Barbara SWMP~~ which protect against pollutants in water quality. Projects occurring outside of County jurisdiction, such as in incorporated cities would be subject to their jurisdiction's ~~SWMP and~~ local regulatory setting regarding stormflows and water quality protections. As a result, cumulative impacts would be considered *insignificant.*

In addition, the Housing Element Update, in combination with cumulative pending development countywide, could adversely affect groundwater quality. As discussed above, polluted runoff that may be generated during construction and post-construction activities of cumulative development and Santa Barbara County projects considered in this analysis would be required to adhere to existing stormwater management and construction requirements, such as the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, ~~Grading Ordinance,~~ Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), NPDES 2022 Construction General Permit, and the NPDES Municipal General Permit~~County's SWMP~~. Individual projects that would disturb an area of one acre or more would also be required to comply with the requirements of the NPDES Construction General Permit (SWRCB Order No. 2012-0006-DQA). These existing regulations would ensure individual cumulative development projects substantially reduce or avoid the discharge of pollutants to surface waters or other areas that could percolate into groundwater and affect the quality of groundwater supplies. The cumulative impacts of the Housing Element Update would be *insignificant.*

With respect to groundwater recharge, all new development would be required to comply with the NPDES Municipal General ~~MS4~~ Permit ~~and State Water Board Construction General Permit, as applicable~~. Additionally, the County's licensing process, along with compliance with state and local regulations governing water quality, would ensure that development projects use BMPs that would limit impacts where the aquifers intersect with the ground surface. Therefore, the Housing Element Update would not substantially contribute to any cumulative impacts on groundwater recharge and impacts would be *insignificant*.

With respect to the depletion of groundwater supplies and compliance with relevant GSPs, cumulative projects include various Housing Element updates for the eight incorporated cities, along with individual development projects proposed in the county that would result in increased agricultural, residential, and commercial development. Individual development projects would generate additional demand for agricultural or domestic water supplies. Depending on the location of individual projects, agricultural and domestic water supplies may be sourced from groundwater from a local groundwater basin subject to an adopted GSP or from an adjudicated basin with specific limits on available groundwater pumping. Increases in development and associated increases in demand for groundwater supplies are likely to exceed the regional growth projections utilized by local GSPs in developing projections for future domestic water demands. The exceedance of these projections has the potential to result in substantial, unanticipated increases in demand for groundwater supplies that would conflict with the sustainable management of a local groundwater basin, resulting in a cumulatively significant impact to which the Housing Element would adversely substantially contribute. Given that cumulative development would exceed these growth projections and generate additional unprojected demand on groundwater supplies, cumulative impacts would be *significant and unavoidable.*

Similar to the Housing Element Update, all new development located within the County's jurisdiction and FEMA-designated flood areas would be required to comply with standard FEMA provisions and County Code floodplain management standards provided in County Code Chapter 15A, Floodplain Management, and 15B Development Along Watercourses. Adherence to these measures, along with the implementation of project-specific mitigation measures for reducing or avoiding flood hazards, would ensure cumulative impacts are reduced. Further, the proposed Project is required to implement **MM HWR-1 (Flood Hazard Development Standards),** which would serve to reduce the site-specific impacts of the Housing Element Update to an insignificant degree, such that the Housing

Element Update would not contribute to a cumulatively significant impact from flooding. Cumulative impacts would be *potentially significant but mitigable.*

3.9.4.4 Proposed Mitigation

MM HWR-1. Flood Hazard Development Standards. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law ~~and which are located within a Special Flood Hazard Area shall~~ address onsite flood hazards to eliminate flood risks to life and property consistent with the Flood Control District's Standard Conditions of Project Plan Approval~~, including, but not limited to, compliance with the following requirements:~~

1. ~~The applicant/owner shall provide a site plan of the proposed development showing the limits of the special flood hazard areas and base flood elevations as they appear on the most current FEMA FIRM.~~

2. ~~The applicant/owner shall provide a site plan of the proposed development showing the top of the bank along those parts of a watercourse that are included within the areas of special flood hazard shown in the FIRM and along those parts of a watercourse that lie between areas of special flood hazard on the same watercourse.~~

3. ~~The applicant/owner shall demonstrate appropriate improvements or measures to mitigate the increased runoff by directing drainage to an acceptable watercourse, improving downstream facilities, mitigating the increased runoff onsite, and/or as otherwise required by the Public Works Director. Runoff shall be conveyed safely to prevent erosion from slopes and/or channels. Natural drainage systems shall be utilized to the maximum extent practical. Disturbed slopes shall be vegetated with appropriate native or drought-tolerant vegetation, permanent channel crossings shall be stabilized, and energy dissipaters such as riprap will be used at outlets of new storm drains, culverts, conduits, or channels that enter unlined channels to minimize erosion potential.~~

4. ~~Improvements to intercept and convey offsite and onsite runoff through the project site to a Flood Control District-approved water course or drainage facility.~~

5. ~~Development located within the limits of the floodplain/floodway as shown on the current FIRM shall process a conditional letter of map revision prior to map recordation or zoning clearance.~~

6. ~~All development shall comply with applicable requirements of the most current Standard Conditions for Project Plan Approval-Water Quality BMPs, as administered by the Santa Barbara County Public Works Department, Project Clean Water.~~

7. ~~Hydrologic studies prepared by a California licensed civil engineer shall be made of the watershed area contributing drainage to the site. Both calculations and clearly marked watershed maps shall be submitted at the plan check submittal for approval by the Public Works Director. Contributing areas shall be based on natural contours or an accepted master drainage plan. Drainage quantities shall be derived from considerations that include the expected future development of the watershed, soil types, historical storm data, and the gradient of the terrain. These considerations must receive approval from the Public Works~~

~~Director. For most major channels, discharge rates will be supplied by the Public Works Director.~~

~~8. Storm drains and drainage inlets shall be sized for a peak 25-year runoff event with a positive overland escape design for a 100-year storm. Storm drains shall be constructed of at least Class III reinforced concrete pipe with a minimum diameter of 18" unless other materials, pipe classifications, or sizes are approved by the Public Works Director. When an existing culvert is to be extended and/or the grade changed, a concrete collar must be used.~~

~~9. The lowest finish floor elevation of all new structures shall be at least 2 feet above the 100-year water surface elevation. Graded lot pads with slab-on-grade foundations shall be at least 1.5 feet above the 100-year water surface elevation, with the finish floor 2 feet above the 100-year water surface elevation. Finish floor elevations may be increased if deemed necessary by the Public Works Director. Finish floor elevations shall be higher than the water surface elevations of the overland escape of adjacent streets, bridges, and other obstructions.~~

~~10. In adherence to Flood Control District requirements, new development would include detention basins on site to reduce the post-development peak stormwater runoff discharge rate as specifically defined below:~~

~~a. In all areas of the County of Santa Barbara, except New Cuyama~~

~~b. Other areas of the county if downstream facilities are determined by the Public Works Director to be inadequate.~~

~~Hydrologic/hydraulic analysis of detention basins shall be performed by a California-licensed civil engineer using a commercially available version of the Santa Barbara Urban Hydrograph method or Flood Control District-approved equivalent.~~

~~11. Drainage improvements proposed to be dedicated to flood control shall be shown on a standalone improvement plan and profile sheets.~~

~~12. During construction, if differing site conditions are encountered that materially affect the drainage improvements shown on the approved plans, the engineer of record shall submit revised plans for the Flood Control District's review and approval prior to the construction of the work.~~

Requirements and Timing: The Flood Control District shall apply the Standard Conditions of Project Plan Approval for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law prior to the issuance of grading or building permits. ~~This measure shall apply to applicable projects immediately following certification of this EIR. The County shall amend the zoning ordinances to include requirements for compliance with the Flood Control District's Standard Conditions of Project Plan Approval. Amendments to the zoning ordinances shall be implemented within 2 years of Housing Element Update adoption.~~

Monitoring: County P&D compliance monitoring staff and Flood Control District Review shall ensure compliance through a review of project plans.

3.9.4.5 Secondary Impacts

Implementation of **MM HWR-1 (Flood Hazard Development Standards)** would potentially create significant secondary impacts associated with changes in community character, disturbance or loss of biological resources, and land use compatibility. As discussed in Impact HWR-4, some potential housing sites are subject to severe flood constraints. Modification of the site to reduce flood hazards may require substantial additional alteration to resources through increased grading or elevation of a site using fill material, or even the alteration of a floodway that supports sensitive biological resources. With requirements for the development of onsite stormwater detention basins and mandatory setback from existing or modified top-of-bank of a watercourse, onsite developable acreage would be substantially reduced and sites designated for 20 to 40 dwelling units per acre (du/ac) may need to propose taller multiple-story development projects of four stories or more to meet maximum and perhaps even minimum densities to achieve Housing Element Update goals, policies, and programs. Such potential impacts are discussed more fully in Section 3.1, *Aesthetics and Visual Resources,* Section 3.4, *Biological Resources,* and Section 3.10, *Land Use and Planning*.

3.9.4.6 Residual Impacts

Impact HWR-1. Future development under the Housing Element Update would be subject to compliance with existing regulations addressing impacts on surface water quality, including the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance, County Code, and the County's NPDES Municipal Permit~~SWMP and IRWM~~, and various other local and state regulations addressing the protection of surface water quality. Compliance with these policies would ensure that the proposed Project would not violate any water quality standards or substantially degrade surface water quality. Therefore, residual impacts associated with Impact HWR-1 would be *insignificant.*

Impact HWR-2. Compliance with existing local and state regulations described above would ensure implementation of the proposed Project would not adversely affect groundwater quality or groundwater recharge. Implementation of the Housing Element Update has the potential to exceed the growth forecasts and associated projections for future domestic water use in local groundwater basins where groundwater is the primary source of domestic water supplies. As such, implementation of the Housing Element Update has the potential to result in additional unplanned increases in demand for groundwater supplies from medium and high-priority basins and associated increases in groundwater pumping. The only way to fully avoid increases in demand for groundwater supply impacts resulting from the proposed Project would be to eliminate sites overlying medium and high-priority basins where groundwater serves as the primary source for domestic water supplies. However, doing so would substantially reduce flexibility or eliminate the ability of County decision-makers to meet regional housing needs and specific affordability targets. Therefore, residual impacts associated with Impact HWR-2 would be *significant and unavoidable.*

Impact HWR-3. Compliance with existing local and state regulations addressing stormwater management would ensure that future housing development would not result in substantial adverse increases in stormwater runoff which would cause or contribute to a violation of receiving water quality standards or exceed the capacity of existing stormwater drainage systems. Housing sites identified under the Housing Element Update have the potential to exist in areas subject to severe flood constraints and hazards. Implementation of **MM HWR-1 (Flood Hazard Development Standards)** would require that multifamily housing projects that are proposed on potential County-

owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law ~~that all new development on sites affected by special flood hazards~~ comply with the design requirements listed in the most recently adopted Flood Control District's Standard Conditions for Project Plan Approval which would ensure that flood hazards are appropriately mitigated through site design and implementation of improvements necessary to reduce on- and offsite flood hazards. Residual impacts associated with Impact HWR-3 would be *significant but mitigable.*

Impact HWR-4. Future development enabled by the Housing Element Update that is located within mapped flood hazard areas would be required to comply with standard FEMA provisions and County Code flood management standards provided in County Code Chapter 15A, Floodplain Management, and 15B Development Along Watercourses. Compliance with these regulatory standards would protect communities and new development from flood risk and ensure that impacts from pollutant release during a flood, tsunami, or seiche event from future development facilitated by the Project. residual impacts associated with HWR-4 would be *insignificant.*

Impact HWR-5. The proposed Project would be required to comply with the requirements of the NPDES Construction General Permit (SWRCB Order No. 2003-005-DWQ) and the County's Storm Drain and Sanitary Sewers Code (County Code Chapter 29 Article IV) to protect against pollutants in water quality. Compliance with existing regulations would ensure the proposed Project would be consistent with applicable basin and water quality control plans. With respect to consistency with groundwater management plans, implementation of the Housing Element Update has the potential to exceed the growth forecasts and associated projections for future domestic water use in local groundwater basins where groundwater is the primary source of domestic water supplies. As such, implementation of the Housing Element Update has the potential to result in additional unplanned increases in demand for groundwater supplies from medium and high-priority basins and associated increases in groundwater pumping. The only way to fully avoid increases in demand for groundwater supply impacts resulting from the proposed Project would be to eliminate sites overlying medium and high-priority basins where groundwater serves as the primary source for domestic water supplies. However, doing so would substantially reduce flexibility or eliminate the ability of County decision-makers to meet regional housing needs and specific affordability targets. Therefore, residual impacts associated with Impact HWR-5 would be *significant and unavoidable.*

Section 3.10
Land Use and Planning

3.10.1 Introduction

This section describes potential impacts related to land use and planning that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). This section describes the existing land uses in the county as well as the goals, policies, and regulations that affect land use planning, particularly the County's Comprehensive Plan and its implementing plans and ordinances such as the County's Zoning Ordinances and community plans. Additionally, this section reviews the consistency of the Housing Element Update with state and regional plans and regulations, including, the Santa Barbara County Association of Governments (SBCAG) 2050 Connected Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SBCAG 2021). This section also describes the changes in land use patterns that could result from the Housing Element Update and evaluates the consistency of those changes with adopted state, regional, and local plans and regulations.

3.10.2 Environmental Setting

Santa Barbara County is one of 58 counties in the State of California. Located approximately 300 miles south of San Francisco and 100 miles north of Los Angeles, the county is bordered by Ventura County to the east and south, a corner of Kern County to the east, San Luis Obispo County to the north, and the Pacific Ocean to the west and south (Figure 3.10-1). Santa Barbara County covers approximately 2,735 square miles of land area along the central coast of California, extending approximately 45 miles north from the south-facing coastal segment and approximately 65 miles inland from the west-facing coastline. One-third of the county's land area is located within the boundaries of the Los Padres National Forest (LPNF). Santa Barbara County has 110 miles of coastline and encompasses four of the eight Channel Islands (including their marine environments): San Miguel Island, Santa Rosa Island, Santa Cruz Island, and Anacapa Island. Santa Barbara County includes diverse geographies, infrastructure, and economies. The county has a $1.8 billion agricultural industry, a strong tourism industry, and various urban, suburban, and rural communities and associated assets (Santa Barbara County Office of Emergency Management [SBCOEM] 2023).

Santa Barbara County includes eight incorporated cities and 19 census-designated places, as well as the sovereign nation of the Santa Ynez Band of Chumash Indians. Santa Barbara County's urban communities are geographically distinctive and separated within the five Housing Market Areas (HMAs). Unincorporated communities in the county range from suburban communities such as Orcutt and Eastern Goleta Valley to small rural towns such as Sisquoc, Los Olivos, Santa Ynez, and Los Alamos. Most county residents live in well-developed urbanized areas with approximately 70 percent of residents living in the eight incorporated cities and 30 percent residing in unincorporated communities and rural areas. The largest proportion of people live in the Santa Maria Valley, along the eastern and central reach of the South Coast from Goleta to Carpinteria, and, to a lesser extent, the Lompoc Valley and Santa Ynez Valley. Within these regions, most residents live in the cities of Santa Maria, Santa Barbara, Goleta, and Lompoc. The most populous unincorporated communities are

Orcutt, Eastern Goleta Valley, and Isla Vista. Section 3.12, *Population and Housing* provides additional information regarding the existing population within the county.

3.10.2.1 Land Use and Zoning

Land use in the unincorporated area is governed by the County's Comprehensive Plan – particularly the Land Use Element (County of Santa Barbara 2016). Land Use Element maps define boundary lines that characterize the intensity of development in the county, and include the following five boundary areas (Figure 3.10-1):

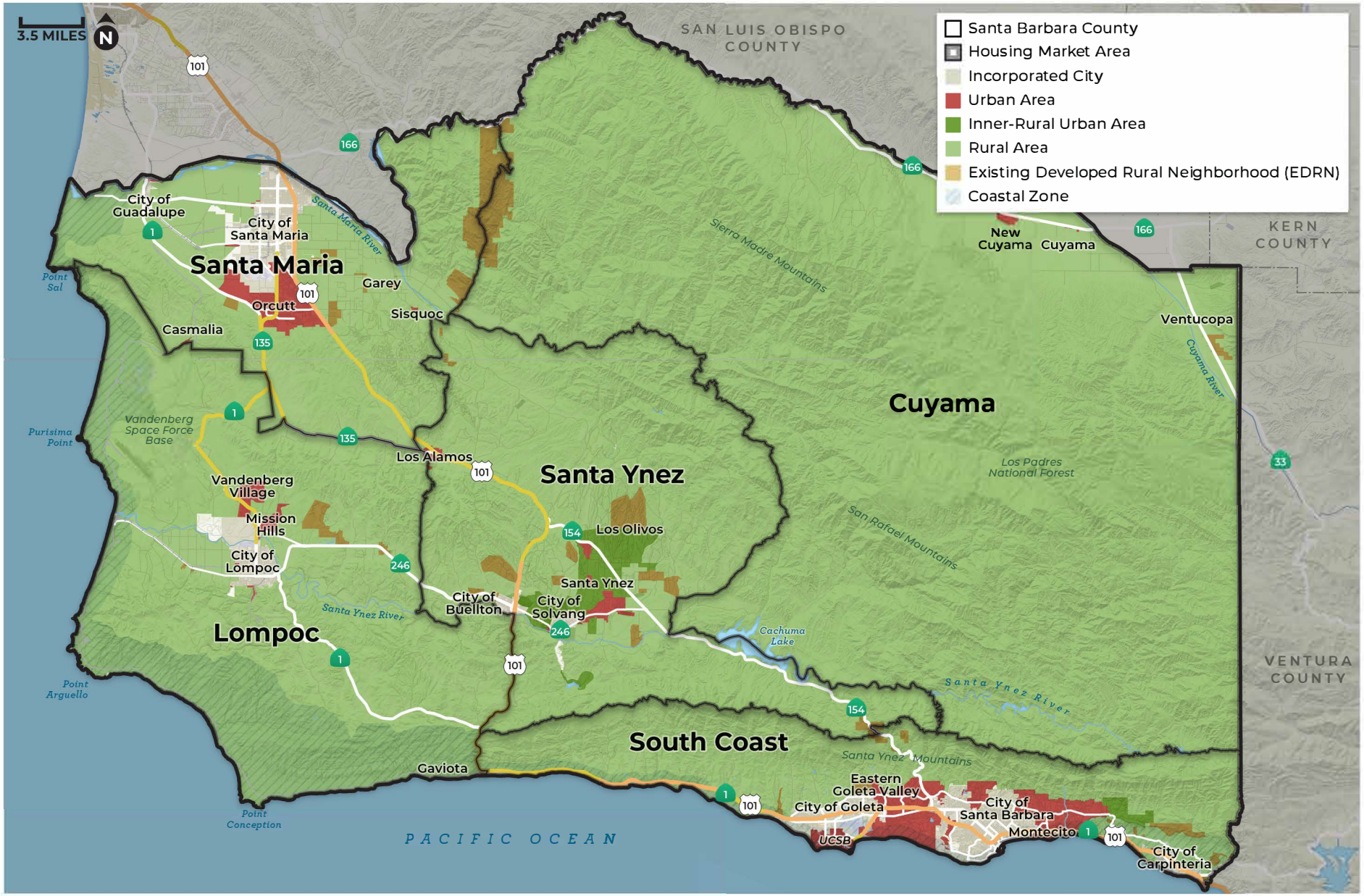
- **Coastal Zone** – The coastal zone spans 110 miles of coastline and includes approximately 184 square miles. The offshore islands of Santa Cruz and Santa Rosa are entirely within the coastal jurisdiction. For most of the coastline, this area only extends 1,000 yards, but it extends further inland in several areas due to the presence of important habitat, recreational, and agricultural resources. These areas include the lands surrounding the Guadalupe Dunes, Point Conception, portions of the Gaviota Coast, including Hollister Ranch, and most of the Carpinteria Valley.

- **Urban Area** – An area within which the development of residential, commercial, and industrial activity, and their related uses, buildings, and structures, including schools, parks, and utilities, are permitted. Open spaces and recreational activities are permitted and encouraged throughout the Urban Area. Agriculture is permitted and encouraged in this area when it is surrounded by urban uses, but when adjacent to a Rural Area, agriculture shall stay in the Rural Area.

- **Inner-Rural Area** – An area where development is limited to rural uses such as agriculture and its accessory uses, mineral extraction and its accessory uses, recreation (public or private), ranchette development, and uses of a public or quasi-public nature. The minimum permitted lot size is 5 acres. Agricultural and open space preserves and related uses are encouraged. The Inner-Rural Area is located adjacent to the Urban Area.

- **Rural Area** – An area where development is limited to agriculture and related uses, mineral extraction and related uses, utility-scale solar photovoltaic facilities (if located in the Rural Area of Cuyama Valley), recreation (public or private), low-density residential and related uses, and uses of a public or quasi-public nature. The minimum lot size permitted in this area is 40 acres.

- **Existing Developed Rural Neighborhood (EDRN)** – A neighborhood area that has developed historically with lots smaller than those found in the surrounding Rural Area or Inner-Rural Area. The purpose of the neighborhood boundary is to keep pockets of rural residential development from expanding into adjacent agricultural lands. Within the EDRN boundary, infilling of parcels at densities specified on the land use plan maps is permitted.



Santa Barbara County Land Use Element Boundaries

FIGURE 3.10-1

The Land Use Element guides the physical development of the county, establishes a pattern of land utilization, and sets out standards for both the density of population and the intensity of development for each of the land use designations and classifications. The Land Use Element describes land use classifications, diagrams the distribution of land uses throughout the unincorporated county, and addresses the policies established for each urban community, either within the Land Use Element or within 10 separate community plans. Figure 3.10-2 illustrates the County Comprehensive Plan's land use classification types as designated countywide.

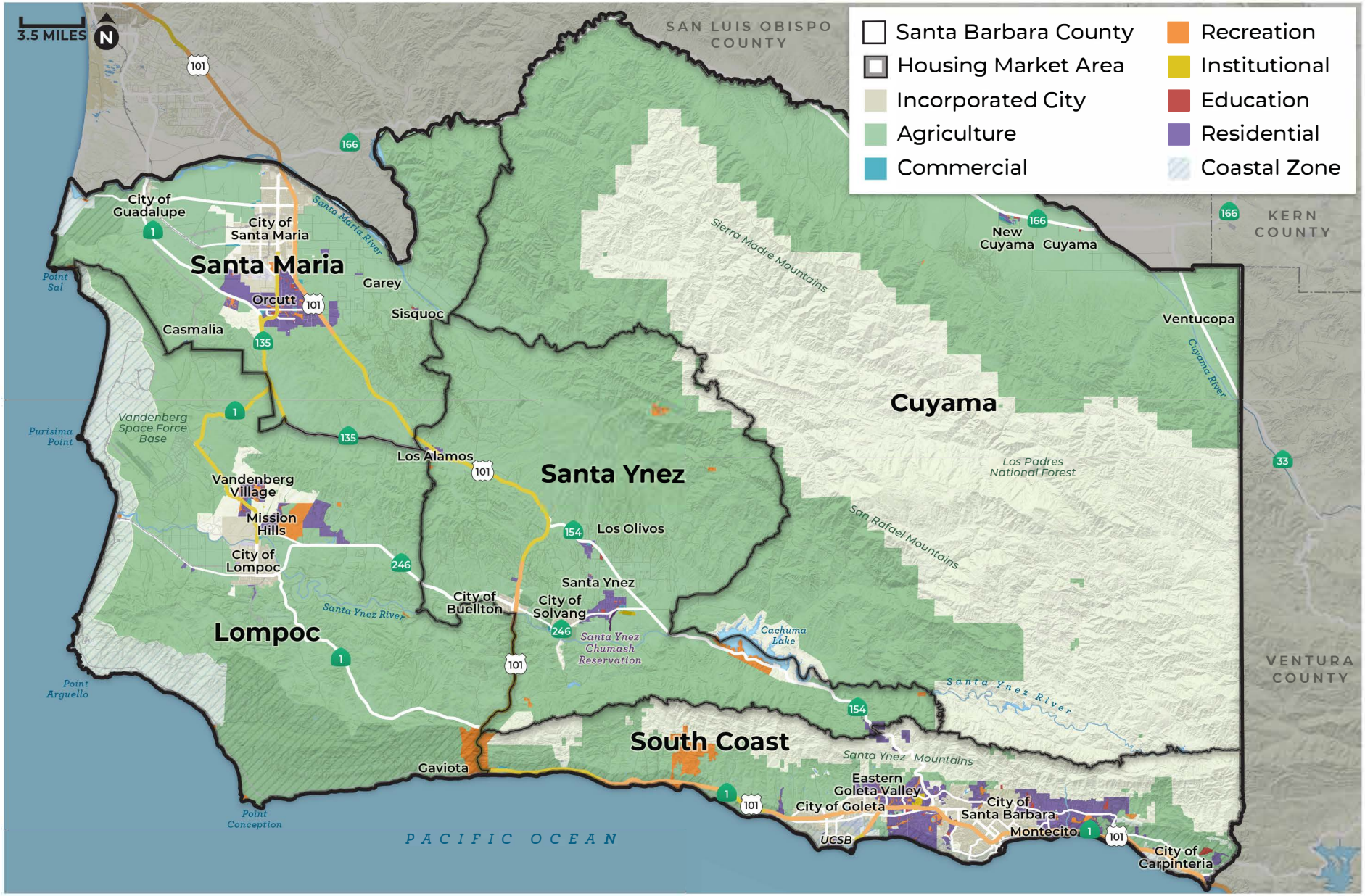
While land use designations characterize the physical uses and the intensity of each allowed land use, zoning ordinances legally define permitted uses and development standards for those uses within zoning districts. Under state general plan law, zoning in the county must be consistent with the County's Comprehensive Plan. The County has three zoning ordinances to carry out the policies and actions of the Comprehensive Plan by classifying and regulating the uses of land within the County (County Code Chapter 35). The County Land Use and Development Code (LUDC) applies to all areas of the unincorporated county except for areas within the Coastal Zone boundary and the Montecito Planning Area. The Montecito Land Use and Development Code (MLUDC) applies to inland portions of the Montecito Planning Area only. Article II Coastal Zoning Ordinance (CZO) applies to all unincorporated areas within the Coastal Zone. The following sections describe the land use designations and zoning districts that exist within the county.

3.10.2.2 Residential Land Use and Zoning

County lands with residential land use designations include but are not limited to land in existing residential use, lands adjacent to residential use, and planned residential development. Per the Land Use Element of the County's Comprehensive Plan, density is the primary parameter within which residential land uses are defined. Density is used to describe the number of dwelling units permitted on an acre of land. Within the Urban Area, residential uses permitted include single-family and multifamily dwelling units, as well as child day care, fraternities, sororities, dormitories, boarding, and lodging houses. The County's Land Use Element specifically defines three residential land use designations as follows:

- **Residential Ranchette (5-20 acres minimum parcel size)** – This designation applies to areas within urban, EDRN, inner-rural, and Coastal Zone areas adjacent to more intensive urban uses. While the use of such parcels is residential, the intent of the designation is to preserve the character of an area and to minimize the services required by smaller lot development. The Residential Ranchette designation permits all forms of cultivated agriculture, grazing, and related activities, which would be allowed under an Agriculture I (AG-I) designation. The Residential Ranchette land use designation is also the zoning designation (RR).

- **Semi-Rural Residential** – The purpose of this designation is to provide for residential development that will preserve the semi-rural character of the Montecito Planning Area and portions of the Toro Canyon Plan Area and the adjacent Cima Del Mundo property. The Semi-Rural Residential designation is characterized by narrow winding roads; predominantly low-density residential development, limited commercial, resort/visitor-serving uses and infrastructure development; a lack of sidewalks and traffic lights; and a diversity of housing, architecture, landscaping, and property sizes. The intent is to allow only development that will minimize additional depletion of constrained resources, services, and infrastructure.



Santa Barbara County Land Use Designations

FIGURE 3.10-2

- **Planned Development** – The Planned Development (PD) designation is intended for large areas within urban boundaries that are appropriate for residential development but need to be planned as a unit because of site constraints such as topographic, geologic or flood hazards or because of significant resource values including archaeological sites or environmentally sensitive habitats. The purpose of the PD designation is to avoid piecemeal development of such areas by requiring coordinated, long -range planning. The PD designation also allows for the flexibility needed in the siting, design, and mix of housing types to provide for safe and attractive development that meets the needs of the community, while protecting resources and providing other public benefits (e.g., avoidance of development in hazardous areas, adequate provision of public services, preservation of open space).

In addition, the County Code defines 10 residential zones, including the nine below that may relate to the proposed Project. The County Code specifies allowable uses, minimum lot sizes, and development standards in each of the residential zones.

- **Single-Family Residential (R-1/E-1)** – The R-1 and E-1 zones are applied to areas appropriately located for one-family living at a reasonable range of population densities, consistent with sound standards of public health, safety, and welfare. This zone is intended to protect the residential characteristics of an area and to promote a suitable environment for family life.

- **One-Family Exclusive Residential (EX-1)** – The EX-1 zone is applied to areas appropriate for high standards of residential estate development on lots larger than one acre. The intent is to ensure that development protects the residential character of the area and is consistent with sound standards that promote public health, safety, and welfare.

- **Two-Family Residential (R-2)** – The R-2 zone is applied to areas appropriate for residential development in the form of two-family dwellings (duplexes) and to maintain a residential character similar to that of one-family neighborhoods. This zone is intended to ensure the compatibility of duplex development with surrounding multiple and one-family dwellings and neighborhoods.

- **Design Residential (DR)** – The DR zone is applied to areas appropriate for one-family, two-family, and multifamily dwellings. This zone is intended to ensure comprehensively planned and well-designed residential development, while allowing flexibility and encouraging innovation and diverse design, and requiring that substantial open space be maintained within new residential developments.

- **Planned Residential Development (PRD)** – The PRD zone ensures the comprehensively planned development of large acreage within the Urban Area as designated on the Comprehensive Plan maps that are intended primarily for residential use. The intent of this zone is to:

    1. Promote flexibility and innovative design of residential development, to provide desirable aesthetic and efficient use of space and to preserve significant natural, scenic, and cultural resources of a site;
    2. Encourage clustering of structures to preserve a maximum amount of open space;
    3. Allow for a diversity of housing types; and

4. Provide recreational opportunities for use by both the residents of the site and the public.

- **Small Lot Planned Development (SLP)** – The SLP zone is applied to areas appropriate for increased opportunities for affordable housing and establishes standards for the development of individual small lots for one-family homes. The intent of this zone is to:

    1. Provide housing opportunities that meet the needs of the community, including housing for low-, moderate-, and middle-income households, families with children, senior citizens, and other identified households in need; and
    2. Ensure a safe and attractive residential environment by promoting high standards of site planning, architecture, and landscaping for small lot planned development.

- **Mobile Home Planned Development (MHP)** – The MHP zone is applied to areas appropriate for mobile homes on non-permanent foundations, in planned developments including mobile home rental parks and mobile home statutory condominiums. The intent is to meet community needs by providing affordable housing opportunities. The intent is also to ensure a safe and attractive residential environment by promoting high standards of site planning, architecture, and landscaping design for mobile home developments.

- **Mobile Home Subdivision (MHS)** – The MHS zone is applied to areas appropriate for increasing opportunities for affordable housing, and established standards for the development of mobile home subdivisions. To this end, the intent of this MHS zone is to meet community needs by providing housing opportunities for low, moderate, and middle-income households, families with children, senior citizens, and other identified households in need. The intent is also to ensure a safe and attractive residential environment by promoting high standards of site planning, architecture, and landscaping for mobile home developments.

- **Multifamily Residential - Orcutt (MR-O)** – The MR-O zone is applied to areas located within the Orcutt Community Plan that are appropriate for new high-quality multifamily residential opportunities at densities considered by state law to be affordable by design to very low and low-income households. The minimum residential density within the MR-O zone shall be equal to the maximum allowed residential density of 20 dwelling units per acre (du/ac), excluding private and public rights-of-way and except as required by state law.

3.10.2.3 Special Purpose Land Use and Zoning

Mixed uses may be allowed in special purpose zones. These zones are defined in the LUDC as follows:

- **MU (Mixed Use) Zone** – The MU zone is applied to areas that are suited for mixed use development (i.e., residential, commercial, and/or industrial uses) because of their location in relation to existing or planned land uses of adjacent areas and infrastructure improvements, such as transportation corridors.

Further, the County Code allows some level of residential use or mixed use within commercial and industrial zones that may relate to the proposed Project, including the Limited Commercial (C-1), Retail Commercial (C-2), General Commercial (C-3), Community Mixed Use – Los Alamos (CM-LA), and Professional and Institutional (PI) commercial zones. Two mixed use zones in Old Town Orcutt allow for residential and commercial uses that preserve the style of the neighborhood areas.

3.10.2.4 Unincorporated Areas by Region

Santa Barbara County consists of eight incorporated cities and 19 census-designated places, including Vandenberg Space Force Base (VSFB), as well as the LPNF and the sovereign nation of the Santa Ynez Band of Chumash Indians. Five regions of the County are used as a geographic basis for the proposed Project and to support the land use analysis, including Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and South Coast. Each of these five regions and their associated land use and planning context are described below.

Table 3.10-1. Land Use Designations by HMA

Land Use Designation	Land Use Designation by HMA (acres)				
	South Coast	Santa Maria Valley	Lompoc Valley	Santa Ynez Valley	Cuyama Valley
Commercial	253	306	110	213	76
Community Facility (including Education, Institutional, Transportation, and Utility Facilities)	2,707	244	934	280	86
Industrial	130	136	17	70	66
Mixed-Commercial/Industrial	--	57	--	--	--
Mixed-Commercial/Residential	--	315	--	--	--
Mixed-Residential/Open Land Uses	--	--	200	--	--
No Jurisdiction (including incorporated cities and VSFB)	20,433	15,766	44,879	2,581	--
None (No Land Use Designation or Land Use Approved by the Board of Supervisors, but Not Certified by the California Coastal Commission)	--	3	--	142	--
Open Land Uses (including Agricultural, Open Lands, and Recreation)	115,894	153,093	245,193	253,426	744,902
Residential	15,813	7,397	3,522	2,471	240
Total	**155,229**	**177,316**	**294,855**	**259,184**	**745,370**

South Coast

The South Coast spans approximately 243 square miles along the southernmost coastline of Santa Barbara County. This coastal area is located between the ridgeline of the Santa Ynez Mountains and the Pacific Ocean from Gaviota Pass to the Ventura County line. Urban development is concentrated

within the eastern region of the South Coast between Goleta and Carpinteria, while the western extent along the Gaviota Coast is mostly rural and sparsely populated. In addition, the South Coast Region supports the greatest amount of State Parks, as well as the University of California, Santa Barbara (UCSB) campus and portions of the LPNF. The South Coast includes the incorporated cities of Santa Barbara, Goleta, and Carpinteria, and the unincorporated communities of Gaviota, Isla Vista, Eastern Goleta Valley, Mission Canyon, Toro Canyon, Montecito, and Summerland. Land use and planning considerations within these unincorporated communities are guided by the Gaviota Coast Plan as well as the Goleta, Eastern Goleta Valley, Mission Canyon, Montecito, Summerland, and Toro Canyon community plans.

Within the unincorporated county, the South Coast includes approximately 15,813 acres of residential land uses, approximately 12 percent of the total unincorporated areas of the South Coast. Commercial land uses comprise nearly 253 acres, less than 1 percent of the total unincorporated areas of the South Coast. Open space land uses, which include agricultural and recreation lands, span 115,894 acres, approximately 86 percent of the total unincorporated South Coast.

Eastern Goleta Valley

The Eastern Goleta Valley occupies approximately 35 square miles of the coastal plain and foothills between the City of Santa Barbara to the east and the City of Goleta to the west (County of Santa Barbara 2015a). Development in Eastern Goleta Valley is more intense closer to the coast and along U.S. Highway 101 and sparser in the northern areas (County of Santa Barbara 2015a). Eastern Goleta Valley is broken up into designated Urban Areas and Rural Areas by its plan. The most abundant land use in the Eastern Goleta Valley is residential, with some agricultural areas at the foothills of the Santa Ynez Mountains and between the Santa Barbara Airport and More Mesa. Recreation and open space designations are located along the coast and Calle Real, and commercial land primarily surrounds U.S. Highway 101 (County of Santa Barbara 2023). The Rural Area stretches from the Urban Area to the LPNF.

Santa Maria Valley

The Santa Maria Valley spans approximately 277 square miles in the northernmost areas of the county adjacent to San Luis Obispo County. The Santa Maria Valley is bounded by the Santa Maria River to the north, the Casmalia Hills to the west, the San Rafael Mountains to the east, and the Solomon Hills to the south. This region contains the incorporated cities of Santa Maria and Guadalupe, and the unincorporated communities of Orcutt, Casmalia, Garey, Sisquoc, and Los Alamos. Land use and planning considerations within the unincorporated community of Orcutt are guided by the Orcutt Community Plan.

The City of Santa Maria and the unincorporated community of Orcutt combine to comprise the largest urban population in the county. Residential land uses within the unincorporated areas of the Santa Maria Valley comprise 7,397 acres, approximately 5 percent of the total unincorporated area. Outside of this area, the Santa Maria Valley is largely rural and undeveloped. Land use in the Santa Maria Valley is predominantly agricultural land (approximately 148,946 acres or 92 percent of the unincorporated area), consisting of vineyards, pastures, and industrial agricultural areas cultivated with row crops and lands developed with greenhouses, with agriculture-related commercial facilities, light industrial uses, ranchette, and low-density residential development that support the agriculture industry.

Orcutt

The unincorporated community of Orcutt occupies approximately 23 square miles within the Santa Maria Valley. Orcutt supports extensive single and multifamily residential areas as well as substantial commercial uses. Nevertheless, Orcutt retains a distinct semi-rural or suburban feeling, with the vast majority of homes constructed at low or medium densities. Significant retail commercial centers are largely confined to the corner of Clark Avenue and Bradley Road. Scattered offices and light industrial uses provide limited "in-town" employment opportunities. Orcutt supports the largest concentration of undeveloped land within the Urban Areas, such as open land in the southwest along Clarke Avenue, State Route (SR) 1, and Black Road. Open lands within the community continue to be an important part of the community's character. While many of these lands are designated for eventual urban use in the Orcutt Community Plan, they receive moderate to heavy public use and contribute to the community's semi-rural character (County of Santa Barbara Planning and Development Department [P&D] 1995).

Lompoc Valley

The Lompoc Valley constitutes the western-most portion of the county and includes the incorporated City of Lompoc as well as the unincorporated communities of Vandenberg Village Mission Hills, and Mesa Oaks, which are largely suburban residential areas north of the City of Lompoc.

The Lompoc Valley covers approximately 461 square miles in the westernmost portion of the county. This region includes the incorporated City of Lompoc and the unincorporated communities of Vandenberg Village and Mission Hills. Additionally, this region includes the federally-owned VSFB, which spans 155 square miles, more area than the incorporated cities of Lompoc, Santa Maria, and Guadalupe combined.

Land uses within the unincorporated areas of the region are primarily agricultural and contain open spaces, vineyards, agricultural fields, pastures, and ranch-style residences. Residential areas within the Lompoc Valley comprise less than 2 percent of the unincorporated areas excluding VSFB. Within the unincorporated communities, residential parcels are primarily located in Mission Hills and Vandenberg Village.

Santa Ynez Valley

The Santa Ynez Valley spans approximately 405 square miles within the central portion of the county. This region includes the incorporated cities of Buellton and Solvang as well as the unincorporated communities of Ballard, Los Alamos, Los Olivos, and Santa Ynez. Several EDRNs surround these Urban Areas, including Ballard Canyon, West Olivos, Bobcat Springs, West Buellton, Woodstock Oak Trails, East Baseline Ranch Estates, Meadowlark, and SR 246 EDRNs.

Agriculture is the predominant land use designation within the Santa Ynez Valley with 242,823 acres, approximately 95 percent of the unincorporated area. Residential land uses within the unincorporated area are predominately concentrated in Ballard, Los Alamos, Los Olivos, and Santa Ynez and cover just 2,741 acres, just 1 percent of the unincorporated areas. The townships and incorporated cities of the Santa Ynez Valley are surrounded by the Inner-Rural land use designation, which serves as a buffer between urban and rural uses. Development within the Inner-Rural Area is limited to agricultural, recreational, and ranchette-style residential uses. Parcel sizes in the Inner-Rural area generally range from 5 to 40 acres. The Rural Area is characterized by larger parcels (40

to several hundreds of acres), less development, and larger-scale agricultural uses (County of Santa Barbara 2009c).

Cuyama Valley

The Cuyama Valley constitutes the largest area of the county, approximately 1,164 square miles, and approximately 43 percent of the total land area within the county. The Cuyama Valley includes the northeast and easternmost portion of the county and is primarily comprised of the federally owned lands of the LPNF. The region along the county's northern boundary constitutes the Cuyama Valley Rural Region, which contains the small communities of Cuyama, New Cuyama, and Ventucopa. These communities are predominantly agricultural in use, with small areas of commercial, educational, industrial, recreational, and residential uses limited to the Cuyama and New Cuyama communities. Land use in the Cuyama Valley consists primarily of irrigated agriculture, dry farming, grazing pastures, and rural residential development. Agricultural land uses comprise approximately 355,351 acres, with residential land uses comprising just 240 acres, or 48 percent, and far less than 1 percent of the unincorporated area, respectively.

3.10.3 Regulatory Setting

State and local plans, policies, and regulations have been enacted to address land use and planning in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the proposed Project and its associated impacts. There are no federal regulations that pertain to local land use and planning impacts.

3.10.3.1 State

Government Code Section 65300 (General Plans)

Government Code Section 65300 requires that each county and city prepare a general plan that serves as the blueprint for how that particular jurisdiction will develop over time. The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private. Zoning ordinances, specific plans, development projects, capital improvements, and development agreements are required to conform to the general plan. In addition, preparing, adopting, implementing, and maintaining the general plan serves to identify the community's land use, circulation, environmental, economic, and social goals and policies as they relate to future growth and development. A general plan consists of individual sections, or elements, that address a specific area of concern, but collectively, they comprehensively make up an integrated planning approach for the jurisdiction. State law requires that general plans include seven elements: land use, transportation, conservation, noise, open space, safety, and housing. Each county and city may choose to have additional elements as part of their general plan.

Senate Bill (SB) 375, California's Sustainable Communities and Climate Protection Act

The adoption of Senate Bill (SB) 375 on September 30, 2008, recognizes the connection between land use planning and reliance on vehicles as the primary mode of transportation, with the result being that emissions from vehicles account for 30 percent of greenhouse gas (GHG) emissions in California. SB 375 aligns the goals of regional transportation planning efforts, regional GHG reduction targets,

and land use and housing allocations, and requires Metropolitan Planning Organizations (MPOs), such as SBCAG, to adopt an SCS or Alternative Planning Strategy (APS) within their RTP to demonstrate achievement of GHG reduction targets. As discussed below, in compliance with SB 375, SBCAG has adopted the Connected 2050 RTP/SCS, which guides land use and transportation planning for the region to reduce transportation-related GHG emissions.

3.10.3.2 Local

SBCAG Connected 2050 RTP/SCS

SBCAG's Connected 2050 RTP/SCS is a long-range transportation plan that sets forth how the region will meet its transportation needs over the next 30-year period through 2050. The RTP/SCS assesses various alternative future scenarios and continues the vision laid out in the prior versions of the RTP/SCS adopted in 2013 and 2017. Existing and future land use patterns and forecasted population and job growth were used to identify and prioritize transportation projects of all transportation modes – including highways, streets and roads, transit, rail, bicycle, and pedestrian – as well as transportation demand management (TDM) measures and intelligent transportation systems. SBCAG updates regional growth forecasts which inform this document every four years. The most recent update to the regional growth forecast in 2019, which informed Connected 2050, reflects a significant increase in determined housing need, as provided in SB 828 (2018) but does not account for population growth that will occur as a result of the 6th Cycle Regional Housing Needs Allocation (RHNA). Connected 2050 RTP/SCS contains goals and policies for land use patterns and transportation planning that align with SB 375. The following list summarizes the most applicable land use goals and policies that would relate to the Project and associated impacts.

Goal 1, Environment: Foster patterns of growth, development, and transportation that protect natural resources and lead to a healthy environment.

Policy 1.1 Land Use: The planning, construction, and operation of transportation facilities shall be coordinated with local land use planning and should encourage local agencies to:

- Make land use decisions that adequately address regional transportation issues and are consistent with the RTP/SCS.
- Promote better balance of jobs and housing to reduce long-distance commuting by means of traditional land use zoning and other, unconventional land use tools, such as employer-sponsored housing programs, economic development programs, commercial growth management ordinances, average unit size ordinances, and parking pricing policies.
- Plan for transit-oriented development consistent with the RTP/SCS by:
    - Concentrating residences and commercial centers in urban areas near rail stations, transit centers, and along transit development corridors.
    - Designing and building "complete streets" serving all transportation modes that connect high-usage origins and destinations.

Goal 3, Equity: Ensure that the transportation and housing needs of all socio-economic groups are adequately served.

Policy 3.2: SBCAG shall encourage local agencies to:

- Address and plan for forecast regional housing needs for all economic segments of the population.
- Plan for adequate affordable and workforce housing within existing urbanized areas near jobs and public transit.
- Consider transit availability and accessibility as an integral element of land use planning and project permitting, with special emphasis on serving the disabled, elderly, and other transit-dependent communities.
- Recognize that housing provided by colleges and universities is an important component of addressing the region's overall housing needs, which should be taken into account in local agencies' own housing plan.

SBCAG Airport Land Use Compatibility Plans

In addition to being within the flight pattern of many airports providing regional flights (i.e., Los Angeles International, San Francisco International, Oakland, San Jose International, Burbank Airport, John Wayne Airport, Long Beach Airport, Ontario International Airport), the county has five commercial aviation airports: 1) Santa Maria; 2) Lompoc; 3) Santa Ynez; 4) New Cuyama; and 5) Santa Barbara. The county also has one military base, VSFB, which is located within the Lompoc Valley.

As the Airport Land Use Commission (ALUC) for Santa Barbara County, SBCAG is responsible for protecting public health, safety, and welfare by ensuring that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations. SBCAG's Airport Land Use Compatibility Plans (ALUCPs) serve as a tool for the ALUC to review land use plans and development proposals within Airport Influence Areas (AIAs). ALUCPs provide land use compatibility policies and ensure that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations. The County's ALUCPs address areas within the AIAs for four airports and one military base in Santa Barbara County: Santa Barbara Airport (SBA), Santa Maria Airport (SMX), Lompoc Municipal Airport (LPC), VSFB, and Santa Ynez Airport (IZA).

Santa Barbara County Comprehensive Plan

The County's Comprehensive Plan is a "comprehensive, long-term general plan" that governs the future growth and development of the unincorporated county. The County's Comprehensive Plan contains land use goals, policies, and implementation measures within each of its elements. The County's Comprehensive Plan provides general goals, policies, and programs applicable to the unincorporated portions of the county. The County's Comprehensive Plan expresses the community's development goals, embodies public policy relative to the distribution of future public and private land uses, and is required to maintain internal consistency between all adopted elements. State-mandated elements included in the County's Comprehensive Plan are the Land Use, Circulation, Conservation, Housing, Noise, Open Space, and Seismic Safety and Safety elements. The Housing Element Update is one of the required elements of the Comprehensive Plan and complies with the Government Code, beginning at Section 65583. In addition, the County's Comprehensive Plan contains the following elective elements: Agricultural, Energy, Environmental Resource Management, Scenic Highways, and Hazardous Waste. The County is also in the process of developing an Environmental Justice Element in compliance with the state's June 2020 General Plan Guidelines. Select elements of the County Comprehensive Plan that relate to land use and planning area profiled below; specific Comprehensive Plan policies that relate to the proposed Project are presented in Table 3.10-3.

Land Use Element

The Land Use Element lays out the general patterns of development throughout the county, including the distribution of real estate, open space and agricultural land, mineral resources, recreational facilities, schools, and waste facilities. The Land Use Element of the County's Comprehensive Plan has four fundamental goals:

- **Environment:** Environmental constraints on development shall be respected. Economic and population growth shall proceed at a rate that can be sustained by available resources.
- **Urbanization:** In order for the County to sustain a healthy economy in the urbanized areas and to allow for growth within its resources and within its ability to pay for necessary services, the County shall encourage infill, prevent scattered urban development, and encourage a balance between housing and jobs.
- **Agriculture:** In the Rural Areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses.
- **Open Lands:** Certain areas may be unsuited for agricultural uses due to poor or unstable soil conditions, steep slopes, flooding or lack of adequate water. These open lands have importance as grazing, watershed, wildlife habitat, mineral resources, recreation, and scenic qualities. These lands are usually so located that they are not necessary or desirable for urban uses. There is no basis for the proposition that all land, no matter where situated or whatever the need, must be planned for urban purposes if they cannot be put to some other profitable economic use.

These goals aim to guide growth to locations and at a rate that can be sustained by available resources; to prevent scattered urban development and balance housing and jobs; to preserve cultivated agriculture and lands with both prime and non-prime farmland; to plan for parks, recreation, and trails (PRT) as part of the Recreation section of the Land Use Element, and to prioritize open lands for non-urban uses where not suitable for agriculture (County of Santa Barbara 2016). Specific Land Use Element policies that relate to the proposed Project's land use are presented in Table 3.10-3.

The Land Use Element also defines and maps land use designations throughout the unincorporated county, including open land uses such as agriculture, park and recreation areas, community facilities, industrial, commercial, and residential, including single-family and multifamily land uses. For residential land uses, the Land Use Element specifies maximum allowed densities in terms of dwelling units per acre. Density is the primary parameter within which residential land uses are defined. Density is used to describe the number of dwelling units permitted on an acre of land or, in later translation into zoning, the number of dwelling units permitted on a lot of a given size. Currently, maximum residential densities range from one unit per 3 or more acres up to 30 du/ac.

Lompoc Area Interpretive Guidelines

The unincorporated Urban Areas of the Lompoc Valley consist of three unincorporated communities: Vandenberg Village, Mission Hills, and Mesa Oaks, which are largely suburban residential areas north of the City of Lompoc. The Lompoc Area Interpretive Guidelines amend the Land Use Element to outline general policies that apply to the Lompoc Valley and address specific issues of the Lompoc Valley, including support for affordable housing. As a result, additional measures may be required for development to achieve consistency with the Comprehensive Plan (County of Santa Barbara 1999).

Proposed Public or Private Park/Recreation Facility Overlay

The 1980 Land Use Element includes a Proposed Public or Private Park/Recreational Facility Overlay to identify future sites to be considered for recreation. This designation identifies by an overlay those lands suitable for future inclusions within the recreational designation defined by the Land Use Element. These lands include the following:

- Lands selected by the County Park Department from those sites designated as having the highest suitability for recreational use;
- Areas designated by advisory committees;
- Shoreline areas designated within the County coastal zone; and
- Additional access along creeks and drainage ways.

There are currently four locations designated with the Proposed Public or Private Park/Recreational Facility Overlay totaling 134 acres. In the South Coast, there are three sites with this overlay, including the Las Varas Ranch and Dos Pueblos Ranch on the Gaviota Coast, and a 23-acre vacant parcel in the center of the Eastern Goleta Valley. The fourth site within this overlay lies in New Cuyama and currently supports Richardson Park. These sites have been designated with this overlay for decades and only one (Richardson Park) has been developed with recreation uses. In Eastern Goleta Valley, the Tatum property (Pending Site No. 42 [Tatum]), located near Turnpike Road and Hollister Avenue, is owned by the Santa Barbara Unified School District and designated with the Proposed Public or Private Park/Recreation Facility Overlay, but zoned for residential use with a residential land use designation. There is a pending application in with the County to develop a housing project on this site.

Parks, Recreation and Trails Maps (PRT Maps)

The PRT Maps are an aspect of the Land Use Element. The PRT Maps consist of five maps adopted by the Board of Supervisors and which establish the envisioned comprehensive parks, recreation, and trails network for the unincorporated area. Specifically, the PRT Maps delineate existing and proposed parks, open areas, joint-use facilities, on-road trails, and off-road trails countywide and in the Montecito-Summerland-Carpinteria area, Goleta-Santa Barbara area, Lompoc area, and Santa Maria area. In addition, in 1997, the Board of Supervisors adopted amendments to the PRT Maps to eliminate the Orcutt Area from the Santa Maria Area PRT Map and adopt by reference the Orcutt Community Plan Parks, Recreation and Trails map of the Orcutt Community Plan. The goal of the PRT Maps is to provide a tool whereby informed land use decisions can be made with advanced knowledge of planned trail locations early in the County's discretionary review process. The lines which represent trails on the PRT Maps do not show the exact locations of existing or proposed trails, and instead represent general corridors where trails exist or are proposed to exist. The PRT Maps also provide guidance on the designation of trails, the acquisition of proposed trails, and trail design standards.

Noise Element

The Noise Element identifies and appraises noise problems within the community and influences the distribution of land uses based on the noise level associated with those land uses (County of Santa Barbara 2009a). In the planning of land use, a 65 A-weighted decibels (dBA) day-night average sound level is regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs. Specific Noise Element policies that relate

to the proposed Project's land use are presented in Table 3.10-3. Section 3.11, Noise provides an analysis of noise impacts relative to the County's adopted noise thresholds.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979 and most recently amended in August 2023) is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards (County of Santa Barbara 2023). The Seismic Safety and Safety Element provides information concerning geology, soils, seismicity, and fire and flood hazards of Santa Barbara County, and provides recommendations and criteria to aid in land use planning to ensure that future development will be compatible with the environment. The Seismic Safety and Safety Element was recently updated to revise wildfire policies and incorporate the 2022 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) by reference. Phase two of the Safety Element Update is currently underway and will address evacuation planning and climate change vulnerability considerations, including drought. Specific Seismic Safety and Safety Element policies that relate to the proposed Project's land use are presented in Table 3.10-3. Hazard impacts related to the Seismic Safety and Safety Element's policies are addressed in Section 3.8, *Hazards and Hazardous Materials*.

Open Space Element

The primary purpose of the Open Space Element is to inform the County and its residents which lands should be considered for open space preservation and the reasons that lie behind the proposals when land use plans are being developed (County of Santa Barbara 2009b). One of the principal purposes of the Open Space Element is to distinguish among lands suitable for outdoor recreation, those suitable for agriculture and mineral resource extraction, and those that should remain in open space for other reasons. Depending on their hazard potential, fragility, location, and other pertinent factors, the open space designation may signify any one of three situations:

- All urbanization should be prohibited.
- Urbanization should be prohibited except in a relatively few special instances.
- Urbanization should be permitted only in appropriate instances, subject to plan review and the imposition of specific conditions to protect against hazards and to preserve the integrity of the land and environment.

The Open Space Element's recommendations on open space preservation are covered in the analysis of the Land Use Element's applicable policies in Table 3.10-3.

Circulation Element

The Circulation Element applies to all roadways and intersections within the unincorporated area of the county, except for those roadways and intersections located within an area included in an adopted community or area plan (County of Santa Barbara 2014b). The Circulation Element of the Comprehensive Plan provides specific policies related to traffic and transportation implications of the proposed development and establishes guidelines to determine the project-related traffic impacts on County roadways. Consistency with the Circulation Element is addressed in Section 3.14, *Transportation*.

Community and Area Plans

Santa Barbara County has 10 community or area plans for unincorporated communities. Each community plan contains goals, objectives, policies, action/programs, and development standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. A policy is a specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed. Several community plans, including the Eastern Goleta Valley Community Plan, the Orcutt Community Plan, and the Santa Ynez Valley Community Plan, include policies related to residential and mixed use land use and development. An overview of each adopted community/area plan is provided below. Specific community plan policies that relate to the proposed Project's land use are presented in Table 3.10-3.

Goleta Valley

Eastern Goleta Valley Community Plan

The Eastern Goleta Valley encompasses the unincorporated coastal plain and foothills reaching from Camino Cielo Road on the north to the Pacific Ocean on the south and covering approximately 23,300 acres of land between the incorporated cities of Santa Barbara and Goleta. Of this area, about 15,300 acres lie within the designated Rural Area, and 7,900 acres lie within the designated Urban Area where the majority of the approximately 36,000 residents of Eastern Goleta Valley live (County of Santa Barbara 2015). The Eastern Goleta Valley Community Plan highly encourages the use of mixed use zoning within the planning area to allow for maximum compatibility and complementary transitions between uses. The Eastern Goleta Valley Community Plan sets goals for new development, including that it reduces stormwater flow, uses energy-efficient designs, provides affordable units, and matches the existing aesthetic character of the community. It states that "[t]he Plan prioritizes neighborhood development in strategic locations near commercial and employment destinations, schools, parks, and multi-modal transportation facilities" (County of Santa Barbara 2015). Existing residential development is mostly located between the foothills and the ocean.

1993 Goleta Community Plan

Land use in Goleta Valley, except for the incorporated area of the City of Goleta and the eastern portion which is now guided by the Eastern Goleta Valley Community Plan, is guided by the Goleta Community Plan (County of Santa Barbara 1993). The western portion of the Goleta Valley Planning Area lies north and west of the City of Goleta, extending northward to the crest of the Santa Ynez Mountains, and from approximately the intersection of Los Carneros Road and Cathedral Oaks Road westward to the eastern boundary of the Gaviota Coast Planning Area. In addition, several isolated pockets of unincorporated land in the southwest, such as Isla Vista, which are surrounded by the City of Goleta and UCSB, are part of the western portion of Goleta Valley. A majority of the Goleta Valley planning area consists of designated Rural Areas. Residential development, particularly affordable development, is encouraged in the Goleta Community Plan. The plan states that new development should be focused in areas with low environmental constraints, should preserve the character of existing neighborhoods, and should be located along major transit corridors near commercial areas and jobs (County of Santa Barbara 1993).

Orcutt Community Plan

The Orcutt Community Plan updates the Santa Barbara County Comprehensive Plan for the unincorporated area of Orcutt and sets goals, policies, programs, actions, and development standards for all future development in Orcutt. It was adopted in 1997 and amended seven times, most recently in 2020 (County of Santa Barbara 1997). The Orcutt Community Plan area is located within the Santa Maria Valley, south of the City of Santa Maria. It encompasses 14,650 acres of mostly urbanized areas. Given the zoning designations within Orcutt, future residential development could occur within undeveloped key sites and vacant areas located throughout the community. Priorities for land development in Orcutt include providing higher densities along existing infrastructure, the completion of development of existing neighborhoods before expanding the community outward, and the retention of the semi-rural flavor of the community.

Santa Ynez Valley Community Plan

The Santa Ynez Valley Community Plan provides policy direction for issues and development trends specific to the Santa Ynez Valley and sets the framework for planning future development (County of Santa Barbara 2009c). The Santa Ynez Valley Community Plan applies to the unincorporated Urban Areas of Santa Ynez, Los Olivos, and Ballard, EDRNs within the vicinity of these communities, and surrounding Rural and Inner-Rural Areas within the Community Plan area. Given the zoning designations within Santa Ynez Valley, future residential development could occur primarily within RES-1.0 and RES-3.3 areas. Residential Development within the Community Plan boundary would be subject to development standards and policies outlined in the plan, such as maintaining the existing rural character of the area, maintaining urban boundaries, and reducing noise and air emissions. The plan encourages housing through mixed use, accessory dwelling units, and agricultural employee housing (County of Santa Barbara 2009c).

Los Alamos Community Plan

The Los Alamos Community Plan establishes and regulates land uses in the community of Los Alamos within the Santa Ynez Valley (County of Santa Barbara 2011). The Plan was adopted in 2011. Residential uses currently occur directly north and south of U.S. Highway 101, and future uses could occur within the jurisdiction of the area, but primarily within Planned Residential Development zoned parcels in the southeast corner of the community as well as the mixed use zone along the Bell Street corridor. The plan also identifies an affordable housing overlay area in the northwest corner of the community. Policies related to development include encouraging growth within the existing community plan instead of expanding the existing urban boundary, providing a variety of housing types while maintaining the rural character of the community, and prioritizing compatibility with agricultural areas (County of Santa Barbara 2011).

Gaviota Coast Plan

The Gaviota Coast planning area is a rural landscape within the South Coast Rural Region, and the Gaviota Coast Plan was adopted in 2016. Much of the area is managed for recreation, including 5,000 acres managed by State Parks and 15,634 acres managed by the U.S. Forest Service (USFS) (County of Santa Barbara 2016c). Three major state parks and one County park exist within the Gaviota Coast: Gaviota State Park, El Capitan State Beach, Refugio State Beach, and Jalama Beach County Park. Industrial land uses in the Gaviota Coast are limited to approximately 100 acres of oil facilities contained within three industrial developments: Plains Exploration and Production Company Point Arguello, ExxonMobil's Las Flores Canyon Processing Facility, and the Tajiguas Landfill. Residential

development is scattered throughout Gaviota but mainly focused close to the coast, with a few homes along U.S. Highway 101 and in the foothills. The Gaviota Coast Plan states that housing development in the community should be appropriate to the Rural Area, including farm employee dwellings, and that higher urban densities are not appropriate due to the rural character and environmental constraints, such as fire risk. It adds that new development should be compatible with adjacent agricultural areas and should avoid environmentally sensitive areas (County of Santa Barbara 2016). It does not identify specific sites for future housing development.

Mission Canyon Community Plan

The planning area for the Mission Canyon Community Plan is approximately 1,122 acres located in the lower foothills of the Santa Ynez Mountains, immediately north and contiguous to the City of Santa Barbara. The land uses consist almost exclusively of single-family residential development except for some commercial and public uses, and parcels zoned for agricultural use in the northern portion of the plan area (County of Santa Barbara 2014a). Residential parcels are scattered throughout the community and are broken up into three neighborhoods in the plan: South of Foothill, Mission Canyon Heights, and Upper Mission Canyon. All three neighborhoods have vacant parcels, according to the community plan. Goals related to future development include ensuring development does not exceed the availability of existing services, protecting the semi-rural character of the community, and maintaining low noise levels. This planning area also is designated a Special Problems Area, given existing or anticipated special and unique problems pertaining to flooding, drainage, soils, geology, access, sewage disposal, water supply, location, or elevation that have the potential to affect public health, safety, and general welfare. A Special Problems Committee (Committee) of interdepartmental County staff reviews proposed buildings and structures. The Committee may impose conditions to prevent or mitigate present or anticipated problems that may result from a development project. The Committee has the authority to prohibit construction if the Committee unanimously agrees that there is no other feasible way to prevent a serious risk of substantial damage to property, public or private, or injury to persons.

Montecito Community Plan

The Montecito Community Plan was adopted in 1992 and its text was updated until 1995 (County of Santa Barbara 1992). Montecito is divided into three areas: the central urban sub-area, the coastal sub-area, and the mountain sub-area. The central urban sub-area is characterized as semi-rural, consisting of primarily single-family homes on lots 1 acre or larger. The central urban sub-area also contains the central core of Montecito and the main commercial center. The coastal sub-area is primarily developed with cottages and duplexes, and coastline development consists of an exclusive residential community, hotel complexes, and several condominium and clustered developments. The mountain sub-area is characterized by mountainous terrain and open space (County of Santa Barbara 1992). The plan prioritizes new residential development that preserves the existing predominantly large lot, and single-family character of the community, while still developing new housing units on vacant lots. The plan identifies potential residential buildout in all three sub-areas and identifies related goals such as preserving the low intensity semi-rural character of the community, providing affordable housing through secondary units and new development, and adding residential uses to other land uses, such as commercial and educational sites.

Summerland Community Plan

The Summerland Plan Area is located in the southern portion of Santa Barbara County between the cities of Santa Barbara and Carpinteria in the South Coast Rural Region. The Plan Area boundary includes the unincorporated area of the county known as Summerland. The Plan Area is bordered by Ortega Ridge Road on the west, the Montecito Planning Area on the west and north, Padaro Lane and the Toro Canyon Planning Area on the east, and the Pacific Ocean on the south. The Plan Area totals 907 acres and is situated within the coastal zone except for a residential enclave along Ortega Ridge Road, which is located in the inland area (County of Santa Barbara 2014c). Existing residential development is clustered along the coast and in the southern half of the community. The plan recommends rezoning parcels to allow for denser residential development, encouraging affordable housing, and removing or legalizing "illegal" residential units to reduce impacts on public services.

Toro Canyon Plan

The Toro Canyon Plan was adopted in 2002 and certified by the California Coastal Commission in 2004. The southern portion of Toro Canyon lies within the coastal zone and includes Padaro and Santa Claus Lanes (County of Santa Barbara 2004). The existing land uses within Toro Canyon include large agricultural areas, low-density residential development, a few more concentrated and scattered residential developments predominantly along U.S. Highway 101 and in the southwestern part of the community, two small commercial areas, recreation, and undeveloped open space. Toro Canyon contains approximately 1,433 acres designated for residential with zoning ranging from RR to R-1/E-1. Policies related to residential development include maintaining the existing predominantly large lot single-family rural character of the community and protecting environmental resources such as sensitive habitat and visual resources.

Coastal Land Use Plan

The Coastal Land Use Plan (CLUP) lays out the general patterns of development throughout the coastal areas of the county. Its purpose is to protect coastal resources while accommodating land use development within the Coastal Zone (County of Santa Barbara 2019). The other elements of the Comprehensive Plan are applicable within the Coastal Zone; however, when there is a conflict, the CLUP takes precedence.

Pursuant to the Coastal Act, each of the 15 counties and 53 cities along the California coast is required to prepare a Local Coastal Plan (LCP). The LCP consists of the local government's land use plans, zoning ordinances, zoning district maps, and implementing actions that, when taken together, meet the requirements and implement the provisions and policies of the Coastal Act at the local level.

The Coastal Act policies focus on the protection of coastal resources and the regulation of development in the Coastal Zone. The policies govern land uses, including environmentally sensitive habitat areas and agricultural lands, recreational resources, the marine environment, scenic resources, and air quality. While the focus of the policies is on resource protection, the policies also govern land use, industrial development, and public works facilities to encourage well-planned and orderly development that is compatible with resource protection and conservation (County of Santa Barbara 2019).

County Zoning Ordinances

Santa Barbara County Land Use and Development Code

The LUDC, a portion of Chapter 35 (Zoning) of the Santa Barbara County Code, carries out the policies of the Comprehensive Plan by classifying and regulating the uses of land and structures within the inland areas of the county, consistent with the Comprehensive Plan. The LUDC is adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the county (LUDC Section 35.10.010 – Purpose of Development Code).

The County uses the LUDC as a tool to implement the goals, objectives, and policies of the Comprehensive Plan, including any applicable community, specific, or area plans. Provisions of the LUDC and any land use, subdivision, or development approved in compliance with these regulations must be consistent with other components of the Comprehensive Plan, including any applicable community, specific, or area plans.

Montecito Land Use Development Code (MLUDC)

The Montecito Land Use Development Code (MLUDC) constitutes a portion of Section 35 of the County Code and implements the County's Comprehensive Plan and the Montecito Community Plan by classifying and regulating the uses of land, buildings, and structures in Montecito located outside of the coastal zone.

Santa Barbara County Coastal Zoning Ordinance (CZO)

Article II CZO, a part of Chapter 35 (Zoning) of the Santa Barbara County Code, applies to the unincorporated Coastal Zone within Santa Barbara County as well as the Channel Islands. The CZO implements the CLUP by classifying and regulating the uses of land, buildings, and structures in the Coastal Zone. Pursuant to Public Resources Code Section 30500 of the California Coastal Act of 1976, the County must prepare an LCP for the unincorporated areas of the county within the Coastal Zone. The ordinance contains the coastal zoning district maps, which apply the regulations of the ordinance to the properties in the coastal areas.

3.10.4 Environmental Impact Analysis

This section discusses the potential land use and planning impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.10.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. For this Program Environmental Impact Report (EIR), implementation of the proposed Project may have a significant adverse impact on land use and planning if it would:

a. Physically divide an established community.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

County of Santa Barbara Environmental Thresholds and Guidelines

In addition to the land use and planning thresholds of significance from Appendix G of the CEQA Guidelines, the County's *Environmental Thresholds and Guidelines Manual* includes consideration of "Quality of Life" issues. Quality of life effects can be broadly defined as the aggregate effect of a project's impacts on individuals, families, communities, and other social groups, and on how those groups function. They are social changes that result from a project, rather than physical effects on the environment. Quality of life effects are typically subjective and not based on quantifiable measures. However, quality of life issues, while hard to quantify, are often of primary concern to the community affected by a project. The County's *Environmental Thresholds and Guidelines Manual* states that although changes to quality of life resulting from a project are not treated as significant effects on the environment pursuant to CEQA, many quality of life considerations are addressed in Comprehensive Plan policies, which are the subject of this section of the Program EIR. Further, project-caused changes to quality of life are social changes that may be used: 1) to identify physical impacts caused by a change in quality of life; and 2) when related to a physical change, to determine whether the physical change is a significant effect on the environment. The thresholds of significance referenced in other impact areas include quality of life considerations. For example, the noise threshold relies on quality of life considerations to determine when noise experienced by a sensitive receptor is considered "significant." The following quality of life issues referenced in the County's *Environmental Thresholds and Guidelines Manual* and the County's Comprehensive Plan policies are relevant to the proposed Project and used herein to inform the determination of impacts related to land use and planning:

1. Loss of privacy
2. Neighborhood incompatibility
3. Nuisance noise levels (not exceeding noise thresholds)
4. Increased traffic in quiet neighborhoods (not exceeding traffic thresholds)
5. Loss of sunlight/solar access

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for lower- and moderate-income units. This programmatic analysis reviews potential impacts anticipated to be enabled under the Housing Element Update and considers whether these changes would be potentially consistent or inconsistent with the land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

This analysis complies with CEQA Guidelines Section 15125(d), which requires that an EIR "…shall discuss any inconsistencies between the project and applicable general plans and regional plans." Further, decision-makers must make findings of Project consistency with the applicable Comprehensive Plan or applicable regional plan policies as part of Project consideration. The

preliminary determinations regarding the consistency of the proposed Project with these policies are presented in this section for informational purposes to inform the CEQA analysis only. All final consistency determinations will be made by the Board of Supervisors (Board) during consideration of the proposed Project. While a preliminary determination of inconsistency with these plans or policies in itself would not constitute an impact on the physical environment, an inconsistency with an adopted plan or policy might suggest that the proposed Project would be conducted in such a way that it could result in an impact to the physical environment. Should the Board determine that the proposed Project is inconsistent with an existing County's Comprehensive Plan or regional plan policy, the proposed Project could not be approved unless measures are identified to eliminate this inconsistency.

This section is based on information from the County's Comprehensive Plan (e.g., the General Plan Elements, community plans, CLUP), the County Zoning Ordinances, and other applicable regional plans (e.g., ALUCPs, 2050 Connected RTP/SCS). Table 3.10-3 and Table 3.10-4 list plans and specific policies that directly relate to the proposed Project and evaluate the proposed Project's consistency based on the Project features described in Chapter 2, *Project Description* and the impact analysis and findings presented in other resources areas of this Program EIR. Significant impacts are considered relative to their consistency or inconsistency with applicable policies where a potential inconsistency with a policy that is adopted for the purpose of avoiding or mitigating significant physical environmental impacts might occur. This analysis also considers the location of potential land use changes and development based on the sites inventory prepared for the Housing Element Update, as depicted in Chapter 2, *Project Description*, as well as overall growth and development assumptions and methodology for this analysis as detailed in Chapter 3, *Environmental Impact Analysis*.

3.10.4.2 Project Impacts

Table 3.10-2, below, provides a summary of the proposed Project's impacts related to land use and planning. A detailed discussion of each impact follows.

Table 3.10-2. Summary of Land Use and Planning Impacts

Land Use and Planning Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact LU-1. The proposed Project would not divide an established community.	Insignificant	No Mitigation Required	Insignificant
Impact LU-2. The proposed Project could result in adverse environmental impacts due to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.	Potentially Significant	MM AV-1 (Objective Development Standards for Multiple Unit and Mixed Use Housing Projects) MM BIO-1 (Tree Protection Plan) MM BIO-2 (Habitat Protection Plan) MM BIO-3 (Wildlife Movement Plan) MM HAZ-3 (Compliance with ALUCP	Significant and unavoidable

Table 3.10-2. Summary of Land Use and Planning Impacts (Continued)

Land Use and Planning Impacts	Impact Classification	Mitigation Measures	Residual Significance
		Density and Open Land Requirements)	
		MM HWR-1 (Flood Hazard Development Standards) MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning) MM NOI-1 (Construction Hours) MM NOI-2 (Site-Specific Noise Study) MM T-1 (Site-based TDM) MM T-2 (Construction Traffic and Access Management) MM T-3 (Funding and Mitigation Fee Programs Update) MM WF-1 (Onsite Defensible Space Requirements)	
Impact LU-3. The proposed Project could potentially cause adverse quality-of-life effects on existing communities due to traffic, noise, or other physical environmental impacts.	Potentially Significant	MM AV-1 (Objective Development Standards for Multiple Unit and Mixed Use Housing Projects) MM NOI-1 (Construction Hours) MM NOI-2 (Site-Specific Noise Study) MM T-1 (Site-based TDM) MM T-2 (Construction Traffic and Access Management) MM T-3 (Funding and Mitigation Fee Programs Update)	See Impacts AV-1, AV-2, NOI-1, NOI-2, T-1 and T-3.
Cumulative Impacts	Potentially Significant	MM AV-1 (Objective Development Standards for Multiple Unit and Mixed Use Housing Projects)	Significant and unavoidable

Table 3.10-2. Summary of Land Use and Planning Impacts (Continued)

Land Use and Planning Impacts	Impact Classification	Mitigation Measures	Residual Significance
		MM BIO-1 (Tree Protection Plan) MM BIO-2 (Habitat Protection Plan) MM BIO-3 (Wildlife Movement Plan) MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements) MM HWR-1 (Flood Hazard Development Standards) MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning) MM NOI-1 (Construction Hours) MM NOI-2 (Site-Specific Noise Study) MM T-1 (Site-based TDM) MM T-2 (Construction Traffic and Access Management) MM T-3 (Funding and Mitigation Fee Programs Update) MM WF-1 (Onsite Defensible Space Requirements)	

Impact LU-1. The proposed Project would not divide an established community.

The proposed Project would enable new residential and mixed use development with higher densities (e.g., 20 dwelling units per acre [du/ac] or more) than historically allowed in certain areas of the unincorporated county. The proposed Project would concentrate new higher-density housing within existing urban and suburban areas as infill on existing sites, many of which would be located along existing travel corridors and near commercial services with existing infrastructure and access to transit. These land use and development changes would not introduce radically different land uses into existing neighborhoods and would not involve reconfigurations of the existing roadway network or general layout of existing communities. As described in Section 3.14, *Transportation*, with **MM T-1 (Site-based TDM)** and **MM T-3 (Funding and Mitigation Fee Programs Update),** the proposed Project would be consistent with sustainable community development goals to focus new housing within existing communities and serve new residents with multi-modal and active transportation

facilities. While these mitigation measures are not required to address this impact, the land use and planning analysis indicates that the proposed Project would support infill within existing communities consistent with existing land use patterns, would not degrade multimodal access, and would not separate existing uses from one another.

While individual housing development projects would involve the development of new roads, private yards, common open spaces, and other physical barriers such as fences and gates, the potential housing sites included in the sites inventory prepared for the Housing Element Update would not divide the existing communities surrounding the sites. In fact, as infill sites, many residential and mixed use projects may have a beneficial effect of connecting existing neighborhoods to other neighborhoods, schools, parks, and commercial services, thereby improving the cohesiveness and continuity of the urban environment. For example, in the San Marcos Agricultural Area, private orchards, greenhouses, and row crops interrupt access between the Walnut/San Simeon neighborhood and the Turnpike Shopping Center and San Marcos High School, as well as transit service provided on Hollister Avenue as the only High Quality Transit Corridor (HQTC) in the unincorporated area. (See also, Section 3.14, *Transportation* for more information about HQTCs.) Development of this area with local roadways, sidewalks, bike lanes, and other multi-modal improvements could enhance the connectivity of the established community, rather than divide it.

Additionally, short-term construction impacts would be constrained within the development sites; however, offsite improvements for utilities or transportation infrastructure would be required for some of the sites (Section 3.14, *Transportation* and Section 3.15, *Utilities and Water Supply*). These offsite improvements would be constructed within existing roadway rights-of-way and would not block access between existing communities. **MM T-2 (Construction Traffic and Access Management Plan)** would require the development of a construction traffic and access management plan. While this mitigation measure is not required to address this impact, it would ensure roadways remain open and operable during construction activities. Therefore, existing roadways would not be blocked, and construction would not limit access to a community or restrict movement within a community.

Approval of the proposed Project would not enact any goals, policies, or programs that would divide a community. Additionally, any future housing development facilitated by the proposed Project would not divide a community; rather it would promote the development of existing vacant or underutilized properties, thereby locating people closer to existing employment, goods, and services within an established community. Therefore, impacts related to dividing an established community would be *insignificant*.

Impact LU-2. The proposed Project could result in adverse environmental impacts due to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

The following discussion of County policies and preliminary determinations regarding the consistency of the proposed Project with these policies is presented to comply with CEQA Guidelines Section 15125(d), which requires that an EIR "…shall discuss any inconsistencies between the proposed Project and applicable general plans and regional plans." This analysis focuses on the relevant local and regional plans and policies identified in Section 3.10.3, *Regulatory Setting* above. Based on the preliminary analysis of policy consistency, the proposed Project could result in inconsistencies with the County's Comprehensive Plan and community plans, as well as the 2050 Connected RTP/SCS and ALUCP. These potential inconsistencies relate primarily to the overall

amount of potential development enabled by the Housing Element Update to meet the RHNA and affordability targets and the potential location of the development based on the sites inventory prepared for the Housing Element Update. Table 3.10-3 presents relevant goals and policies from the County Comprehensive Plan, including applicable policies from community plans where the proposed Project involves land use and zoning changes.[1] Other plans, including relevant portions of the 2050 Connected RTP/SCS, ALUCPs, and CLUP that relate to land use and development are evaluated below in Table 3.10-4.

In addition to land use and planning issues addressed in this section, a range of other types of policy consistency issues are addressed in other sections of this Program EIR as follows: consistency with applicable visual resources and aesthetics plans and policies are addressed in Section 3.1, *Aesthetics and Visual Resources*; consistency with the Santa Barbara County Air Pollution Control District (APCD) plans and policies (e.g., Clean Air Plan, Ozone Plan) is addressed in Section 3.3, *Air Quality*; climate change and GHG plans and policies (e.g., County Climate Action Plan) are addressed in Section 3.7, *Greenhouse Gas Emissions*; consistency with County public service standards (e.g., County Fire Department and Sheriff's Office staffing and service) and parks and recreation policies is addressed in Section 3.13, *Public Services and Recreation*; and consistency with regional and local transportation plans and policies are addressed in Section 3.14, *Transportation*.

As described in Chapter 2, *Project Description*, potential residential and mixed use development enabled by the Housing Element Update would generally be located consistent with regional and County policies that support infill development rather than conversion of rural lands and sprawl of urban development. The Housing Element Update proposes a land use pattern for residential and mixed use development countywide that supports sustainable community planning by identifying potential housing sites in existing communities served by active transportation and near jobs. The proposed Project would bring new residential development to communities currently served by active transportation infrastructure, including sidewalks, bike lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. This is especially true for residential and mixed use development projects located within the Santa Maria Valley (i.e., Orcutt) and South Coast (i.e., Eastern Goleta Valley), which support reduced vehicle miles traveled (VMT) relative to other HMAs. (See Impact T-2 in Section 3.14, *Transportation.*) Further, in Eastern Goleta Valley, Hollister Avenue, Calle Real, and Turnpike Road are defined as Eastern Goleta Valley Corridors and prioritized for multimodal improvements in County transportation project planning. Most of the potential South Coast housing sites are located along these corridors and would be well-served by ongoing multi-modal improvements to these roadways. As such, the proposed Project would promote more sustainable land use patterns countywide to accommodate the RHNA. Further, a key objective of the Housing Element Update involves providing a diversity of housing in locations to meet local housing needs, which would generally be consistent with the Comprehensive Plan and community plans and have a beneficial effect on the availability of housing in the unincorporated county, including affordable housing.

However, infill development within existing communities can cause potential policy inconsistencies, particularly when housing development would require the conversion of existing agricultural lands or expansion of urban development into the Rural Area, or would not be adequately served by public services and utilities (i.e., water supply). Further, higher-density development (i.e., 20 du/ac or more) concentrated in existing urban communities could exceed growth projections that inform public

[1] Existing vacant sites included in the sites inventory with no proposed change to land use or zoning are presumed to be consistent with the existing Comprehensive Plan and community plan, if applicable.

service provision and resource management. Substantial increases in residential land uses could also increase demand for public parks and recreation and commercial services to serve new residents when existing parks or commercial services are either not located near new housing or are insufficient to serve the needs of substantial new populations in an area. The potential for housing projects to be underserved by public parks, recreation, and neighborhood-serving commercial uses (i.e., those serving such day-to-day needs of residents in the immediate area such as food, pharmacy, fuel, and other incidentals) is highest where clusters of potential housing sites zoned DR would not be permitted under existing zoning standards to include public parks, recreation, and neighborhood-serving commercial uses as ancillary uses to serve future residents. For example, as the DR zoning district currently does not permit public open space or commercial uses, the development of the potential rezone sites within the South Patterson Agricultural Area in Eastern Goleta Valley or Rezone Site No. 24 (Key Site 26) in Orcutt could create substantial new residents that would not have convenient access to public parks, recreation, or day-to-day neighborhood commercial uses (e.g., convenience stores). These policy issues are described in detail in Table 3.10-3 and Table 3.10-4.

Additionally, as described in Chapter 3, *Environmental Impact Analysis*, because sites have not yet been selected by the County, the proposed Project considers the maximum potential buildout of all potential sites included in the sites inventory prepared for the Housing Element Update. Development of all these sites would create capacity for substantially more development than needed to meet the RHNA and would far exceed the minimum total units needed by each site, as calculated in the sites inventory prepared for the Housing Element Update (i.e., the maximum potential buildout of the sites inventory including the Potential Rezone Program is 34,558 units, which is 28,318 more units than the RHNA with a 15 percent buffer for the lower- and moderate-income affordability levels). This maximum potential growth substantially exceeds regional growth forecasts, which may indicate a potential plan inconsistency. Refer to the discussion of Impact PH-1 in Section 3.12, *Population and Housing,* and Impact T-1 in Section 3.14, *Transportation* for a detailed discussion of the Project's consistency with the projections of the Connected 2050 RTP/SCS and the Regional Growth Forecast 2050.

Mitigation measures identified in other sections of this Program EIR would reduce or mitigate impacts on aesthetics, biological resources, hazards, hydrology and water quality, noise, construction traffic effects, transportation and circulation, VMT, utilities and water supplies, and wildfire hazards, and would help to ensure or result in Project consistency with land use plans, policies, or regulations addressing these issues. Further, **MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** would require the County to amend the County's zoning ordinances to allow public open space (i.e., public parks and recreation), commercial recreation, and neighborhood-serving commercial uses as a component of housing projects on sites zoned DR. This measure would change the County's DR zone district to support the needs of future residents and the community as a whole consistent with the Comprehensive Plan. This measure would also help address impacts related to public parks and recreation. (See Section 3.13, *Public Services and Recreation*.)

While mitigation measures would help to ensure consistency with plans and policies, as recorded in Table 3.10-3 and Table 3.10-4, the proposed Project would exceed growth projections and develop sites in areas with significant environmental impacts that would conflict with County plans and policies. The only way to fully avoid these impacts resulting from the implementation of the Housing Element Update would be to eliminate sites that are inconsistent with County plans and policies, thereby eliminating potential housing sites from future development. However, doing so would substantially reduce the flexibility and potentially make it infeasible for County decision-makers to meet the RHNA plus 15 percent buffer and affordability targets. Therefore, with mitigation, impacts would be *significant and unavoidable*.

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
Aesthetics & Visual Resources			
Comprehensive Plan – Land Use Element	Visual Resource Policy 3	In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.	**Potentially Inconsistent**. As analyzed in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would facilitate new residential and mixed use development that could conflict with the existing scale and visual character of the Urban and Rural Areas. This visual impact is largely associated with higher density housing and mixed use development of 20 du/ac or more and up to four stories or more. **MM AV-1** would help to ensure new housing projects would be consistent with the existing character of the Rural Area and would be consistent with visual resource policies, zoning code standards, and applicable regulations in the Urban Area; however, this measure could not fully avoid these potential impacts to community scale and character.
Comprehensive Plan - Lompoc Area Interpretive Guidelines	Policy A-11	New homes on lots on the edge of bluff tops and in other locations that are highly visible to the public should be of single story or partial second story design to minimize impacts to public view corridors. Where such sites are also constrained by unique biological resources, two-story homes may be allowed where public views are protected by extensive landscaping.	**Potentially Inconsistent**. As analyzed in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would facilitate new residential and mixed use development on sites in the Lompoc Valley that would be higher-density housing and mixed use development of 20 du/ac or more and up to four stories or more, including potential rezoning of sites that are highly visible, such as Rezone Site No. 32 (Fong 1) and No. 33 (Fong 2), located at the gateway to Mission Hills. **MM AV-1** would apply, but future development over two stories in this region would remain potentially inconsistent with the Comprehensive Plan in the Lompoc Valley.
Comprehensive Plan – Lompoc Area Interpretive Guidelines	Policy A-12	All development, including buildings, understories, fences, water tanks and retaining walls adjacent to designated natural open space areas should be sited and designed to protect the visual character of these areas and blend in with natural landforms through the use of such methods as setbacks, building	**Potentially Consistent**. As analyzed in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would facilitate new residential and mixed use development on sites in the Lompoc Valley that would be denser and taller with a larger development footprint with potential modifications to development standards provided under Program 1 of the Housing Element Update. Under Program 1 of the Housing Element Update, the County would potentially reduce its development standards (e.g., height, lot coverage, and open

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		orientation, materials and colors (earth tones and non-reflective paints), landscape buffers, shielded exterior lighting, screening of parking areas and inclusion of perimeter roads to allow maintenance of open space corridors.	space requirements) to ensure that maximum densities can be achieved to meet the County's RHNA plus 15 percent buffer. However, **MM AV-1** would apply, and the objective design standards would require projects to incorporate many of these elements into their site and architectural design in order to help protect the visual character of the surrounding areas.
Goleta Community Plan	Policy VIS-GV-6	Outdoor lighting in Goleta shall be designed and placed so as to minimize impacts on neighboring properties and the community in general.	**Potentially Consistent**. As analyzed in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would facilitate new residential and mixed use development that could conflict with the existing visual character and adversely affect public viewsheds in the Urban Area in Eastern Goleta Valley. This visual impact is largely associated with higher-density housing and mixed use development of 20 du/ac or more and up to four stories or more, which could obstruct existing views and change neighborhood character due to structures, lighting, and landscaping. For example, Rezone Site No. 12 (St. Vincent's East) and No. 13 (St. Vincent's West) could include residential neighborhoods with up to 30 du/ac and up to four stories or more, which would potentially be highly visible from public viewsheds in the foothills and designated scenic roadways, such as SR 154. **MM AV-1** would help to ensure new multifamily housing projects would complement existing neighborhoods and enhance viewsheds and, as a result, help to ensure consistency with visual resource policies, zoning code standards, and applicable regulations in the Urban Area.
Eastern Goleta Valley Community Plan	Policy EGV-4.1	Land use and development shall complement existing neighborhoods and enhance aesthetics and viewsheds, where site suitability and layout, project scale, neighborhood land use characteristics, and urban design are factors considered in planning and design.	
Orcutt Community Plan	Policy VIS-O-2.	Prominent public view corridors (U.S. 101, State Routes 1 & 135, Clark Ave., Santa Maria Way, and Union Valley Parkway) and public viewsheds (Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek) should be protected.	**Potentially Inconsistent**. As analyzed in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would facilitate new residential and mixed use development that could adversely affect public views in the Urban and Rural Areas in Orcutt. Adverse visual effects would occur from the development of housing sites that either lie in the County's designated Rural Area or on the urban fringe where housing development would indirectly affect the visual characteristics of rural scenic

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
			resources. For example, Rezone Site No. 23 (Key Site 16) in Orcutt would involve the conversion of open land to mixed use development of up to 40 du/ac and four stories or more on Clark Avenue on the western edge of Old Town Orcutt. This potential development would dramatically change the character of the site and obstruct clear views of the Casmalia Hills from Clark Avenue, a designated local scenic road. Rezone Site No. 23 (Key Site 16) is on the fringe of the Urban Area but would substantially change the existing open land and rural character of western Orcutt if rezoned and developed as an implementation of the proposed Project. It is notable that Rezone Site No. 23 (Key Site 16) is already planned for lower-density development under the Orcutt Community Plan but is currently undeveloped and the Housing Element Update could increase the density and scale of future development of the site.
Santa Ynez Valley Community Plan	GOAL LUT-SYV 2	New residential development should fit-in seamlessly with existing surrounding development.	**Potentially Inconsistent**. As analyzed in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would facilitate new residential and mixed use development that could be potentially inconsistent with surrounding development. For example, Rezone Site No. 35 (Chumash LLC) is located at the entrance to Santa Ynez on SR 246. Development of the site at densities of up to 40 du/ac and building heights up to four stories or more may not fit seamlessly with surrounding agricultural and rural settings, as well as the small-town character of adjacent urban development.
Agricultural Resources			
Comprehensive Plan – Agriculture Element	GOAL II.	Agricultural lands shall be protected from adverse urban influence.	**Potentially Consistent**. As described in Section 3.2, *Agricultural Resources*, the future potential residential and mixed use development enabled under the Housing Element Update would potentially convert existing agricultural lands that are designated Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, including 20 acres in the North County and approximately 267 acres within the South Coast. The proposed Project would enable the conversion of

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
			approximately 38 acres of agriculturally designated lands in the North County and approximately 366 acres of land within the South Coast to non-agricultural uses. That said, as noted under Goal III below, the Agricultural Element does anticipate instances where conversion to other uses is necessary, especially within urban areas of the County. Additionally, concentrating the future housing sites within the urban areas of the County helps to protect rural agricultural lands from adverse urban influence.
Comprehensive Plan – Agriculture Element	GOAL III. Supporting Policy III.A	GOAL III. Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations. Policy III.A. Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.	**Potentially Inconsistent**. As described in Section 3.2, *Agricultural Resources*, the proposed Project's Potential Rezone Program may isolate agriculturally zoned land in the Urban Area of Eastern Goleta Valley, making it ultimately non-viable. The proposed Project also could result in the rezoning of rural agricultural areas to housing, as exemplified by Rezone Site No. 11 (Glen Annie), which is zoned AG-II-40 and located north of the City of Goleta. While rezoning Glen Annie would result in the conversion of AG-II lands to urban uses, the site is currently developed as a golf course surrounded on three sides by productive rural agricultural uses such as orchards. If selected, conversion of this site may be inconsistent with this policy if infill development in the Urban Area is available.
Eastern Goleta Valley Community Plan	Policy LUA-EGV-1	Agricultural resources, agricultural land uses and operations, and distinctive urban and rural agricultural characteristics shall be preserved to the greatest extent feasible.	**Potentially Consistent**. As described in Section 3.2, *Agricultural Resources*, the proposed Project would not convert any agricultural land in the Rural Area in Eastern Goleta Valley, which ensures that the vast majority of agricultural resources, agricultural land uses and operations, and rural agricultural characteristics would be preserved, The future potential residential and mixed use development enabled under the Housing Element Update would potentially convert existing agricultural lands in the Urban Area only, including potentially all of the San Marcos Agricultural Area and a majority of the South Patterson Agricultural Area, which are the two
Eastern Goleta Valley Community Plan	Policy LUA-EGV-1.5	**Urban Agricultural Land Uses:** Agricultural land within the Urban Area shall be preserved for urban agricultural uses to the greatest extent feasible.	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
Eastern Goleta Valley Community Plan	Policy LUA-EGV-1.6	**Urban Agricultural Land Use Conversion**: To the greatest extent feasible, any general plan amendment and/or rezone proposal in the Urban Area which results in a change of land use designation from agricultural to non-agricultural shall: 1. Require a factual and substantive finding by the County that (a) the land is no longer appropriate for urban agricultural land uses following due consideration consistent with all policies of the Plan, or (b) there is an overriding public need for conversion to other uses. As part of the finding the County will: a. Evaluate and document factually and substantively the quality and extent of agricultural resources onsite and adjacent to the property, including, but not limited to, prime agricultural land, land in existing agricultural use, lands with prime soils, grazing land, land with agricultural potential, and lands under Williamson Act contracts. 2. Require proposed land uses that: a. Are consistent with all policies of this Plan. b. Are compatible with each other and with neighboring land uses—whether agricultural or non-agricultural.	remaining agricultural blocks in the Urban Area within Eastern Goleta Valley. Substantial portions of these urban agricultural lands are also designated Prime Farmland, Unique Farmland, and Farmland of Statewide Importance by the State of California. While conversion of urban agricultural land would have a physical impact on agricultural resources, as described in Section 3.2, *Agricultural Resources*, the Housing Element Update would preserve urban agricultural resources to the greatest extent feasible because the sites inventory only includes the minimum number of agriculturally-zoned housing sites to adequately accommodate the County's RHNA plus 15 percent buffer for lower- and moderate-income affordability levels in conformance with state housing law. As a result, even though there is a potential for conversion of urban agriculture, the Housing Element Update preserves urban agriculture in Eastern Goleta Valley to the greatest extent feasible given state-mandated housing needs. Further, the Eastern Goleta Valley Community Plan sets forth conditions and requirements for conversion of these two urban agricultural areas to non-agricultural uses. If selected by the Board, conversion of these designated urban agricultural areas would also require the Board to make the required findings in accordance with these policies, including consideration of agricultural viability and community planning to ensure the conversion realizes several community goals for recreation, open space, resource conservation, and protection of any remaining urban agricultural areas. Because the proposed Project would preserve all rural agricultural land in Eastern Goleta Valley, would preserve urban agricultural land to the greatest extent feasible, and would involve Board policy consistency findings, the Housing Element Update would be potentially consistent.

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		c. Avoid partitioning or interrupting contiguous blocks of agriculturally-designated lands. d. Preserve and enhance environmental resources, including, but not limited to coastal bluff geology, habitat areas, visual resources, and watershed resources, and community characteristics, particularly with regard to agricultural heritage and natural environmental resources, and/or minimize environmental impacts. e. Include provisions for the community's social, economic and cultural well-being, and health and safety, such as public parks, open spaces, trails, habitat protection or restoration, and/or community gardens. f. Dedicate public open space for habitat preservation and/or public recreation and indicate the amount and extent. g. Provide public coastal access, parking, recreational trails, bike paths, and/or pedestrian routes. h. Confine and cluster non-agricultural development adjacent to existing developed areas and transportation facilities to maximize preservation of open space, with the exception of passive public	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		recreation improvements such as trails, signs and park facilities.	
Orcutt Community Plan	Policy LUA-O-3	In consideration of conversion of any agricultural land within the urban boundary to urban uses, the County shall first consider smaller, more isolated parcels with greater urban/agricultural conflicts prior to considering conversion of larger blocks of agricultural lands.	**Potentially Consistent**. The proposed Project does not propose to convert existing agricultural land to residential or mixed use development in Orcutt.
Orcutt Community Plan	Policy LUA-O-2	Development in Orcutt shall be compatible with adjacent or nearby agricultural lands.	**Potentially Consistent**. The proposed Project does not propose to convert existing agricultural land to residential or mixed use development in Orcutt and development would be generally compatible with adjacent agricultural lands given the distance and intervening uses between potential housing sites and agricultural areas outside the Urban Areas of the community.
Santa Ynez Valley Community Plan	Policy LUA-SYV-3	New development shall be compatible with adjacent agricultural lands.	**Potentially Consistent**. The proposed Project does not propose to convert existing agricultural land to residential or mixed use development in Santa Ynez Valley. For example, Rezone Site No. 35 (Chumash LLC) lies at the existing edge of the developed footprint of Santa Ynez, adjacent to rural agriculture. Similar to existing development in this area, the infill of this site would not infringe on adjacent agricultural land and all urban uses would be contained within the site.
Biological Resources			
Comprehensive Plan – Lompoc Area Interpretive Guidelines	Policy A-6	Development should be sited and designed to avoid disruption and fragmentation of significant natural resources, minimize removal of oaks and Bishop Pines and other significant native vegetation, preserve wildlife corridors, and	**Potentially Consistent with Mitigation.** As discussed in Section 3.4, *Biological Resources,* development facilitated by the Housing Element Update could cause impacts to sensitive natural communities and habitats. **MM BIO-1** would require a tree protection plan to avoid impacts on oak trees**. MM BIO-1** and **MM BIO-2** require standard setbacks from native habitats and the location of new development outside the canopy dripline of native trees, respectively. **MM BIO-3** would require

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		provide reasonable levels of habitat restoration.	a wildlife movement plan to address the protection of wildlife linkages on a site-by-site basis. While impacts on biological resources would remain significant, these measures would potentially ensure consistency with the applicable Comprehensive Plan policies.
Eastern Goleta Valley Community Plan	Policy EGV-3.2	Clustering or relocation of development to less sensitive areas or parcels to conserve open land and environmental resources shall be strongly encouraged without resulting in urban development patterns in the Rural Area.	**Potentially Consistent**. Based on the sites inventory prepared for the Housing Element Update, the Potential Rezone Program would involve DR zoning, which requires open space preservation and clustering of residential development in Eastern Goleta Valley.
Goleta Community Plan	Policy BIO-GV-2	Environmentally Sensitive Habitat (ESH) areas and Riparian Corridors within the Goleta Planning Area shall be protected and, where feasible and appropriate, enhanced.	**Potentially Consistent with Mitigation.** As discussed in Section 3.4, *Biological Resources,* development facilitated by the Housing Element Update could cause impacts to sensitive natural communities and habitats. **MM BIO-1** would require a tree protection plan to avoid impacts on oak trees**. MM BIO-1** and **MM BIO-2** require standard setbacks from native habitats and the location of new development outside the canopy dripline of native trees, respectively. **MM BIO-3** would require a wildlife movement plan to address the protection of wildlife linkages on a site-by-site basis. While impacts to biological resources would remain significant, these measures would potentially ensure consistency with these policies in the unincorporated Goleta, Eastern Goleta Valley, Orcutt, and Santa Ynez Valley.
Goleta Community Plan	Policy BIO-GV-5	Native woodlands designated as environmentally sensitive habitats shall be preserved and protected.	
Goleta Community Plan	Policy BIO-GV-7	Riparian vegetation shall be protected and shall not be removed except when clearing is necessary for the maintenance of free flowing channel conditions, the provision of essential public services or where protection would preclude the reasonable use of a parcel. Degraded riparian areas shall be restored.	
Goleta Community Plan	Policy BIO-GV-10	To the greatest extent feasible, natural stream channels shall be maintained in an undisturbed state in order to protect banks from erosion, enhance wildlife	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		passageways, and provide natural greenbelts.	
Goleta Community Plan	Policy BIO-GV-15	Significant biological communities shall not be fragmented into small non-viable pocket areas by development.	
Goleta Community Plan	Policy BIO-GV-16	To the maximum extent feasible, "protected trees" shall be preserved. Protected trees are defined for the purposes of this policy as mature native trees that are healthy and structurally sound and have grown into the natural stature particular to the species.	
Goleta Community Plan	Policy BIO-18	Trees serving as known raptor nesting or key raptor roosting sites shall be preserved to the maximum extent feasible.	
Eastern Goleta Valley Community Plan	Policy ECO-EGV-2.3	Where sensitive plant species and sensitive animal species are found pursuant to the review of a discretionary project, the habitat in which the sensitive species is located shall be preserved to the maximum extent feasible. For the purposes of this policy, sensitive plant species are those species that appear on the County's list of locally rare, generally rare, or endangered plants, and the California Native Plant Society's Inventory of Endangered Vascular Plants of California. Sensitive animal species are defined as those animal species identified by the California	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		Department of Fish and Wildlife, the U.S. Fish and Wildlife Service and/or are listed in Tate's The Audubon Blue List (birds).	
Eastern Goleta Valley Community Plan	Policy ECO-EGV-2.4	Where sites proposed for development contain sensitive or important habitats and areas to be preserved over the long-term, degradation of these habitats shall be avoided to the maximum extent feasible, and demonstrated unavoidable impacts minimized as a component of a project, including, but not limited to, one or more of the following conditions: Dedication of onsite open space easements covering habitat areas. Onsite habitat restoration programs utilizing appropriate native, drought-tolerant, and/or fire-resistant species. Monetary contributions toward habitat acquisition and management. Offsite easement and/or restoration of comparable habitat/area when onsite preservation is infeasible.	
Orcutt Community Plan	Policy BIO-O-5	New facilities in Orcutt, including roads, bikepaths/trails, sewer lines and retention basins, shall to the maximum extent feasible be sited and designed to avoid disruption of significant natural resources within designated natural undeveloped open space areas, minimize removal of significant native vegetation and trees and provide for reasonable	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		levels of habitat restoration for significant habitats disrupted by construction.	
Santa Ynez Valley Community Plan	Policy BIO-SYV-1	Environmentally sensitive biological resources and habitat areas shall be protected and, where appropriate, enhanced.	
Geology & Soils			
Comprehensive Plan – Land Use Element	Policy 3-13 / Hillside and Watershed Protection Policy 1	Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.	**Potentially Consistent.** Residential and mixed use development occurring as a result of the proposed Project would require, to varying extents, grading, cutting, and filling activities. However, most of the sites identified for potential future housing development are located in Urban Areas that would not require excessive alteration of the natural terrain. Additionally, all development would be required to comply with California Building Code Chapter 70 standards, which include certification of grading plans, cut and fill, and erosion control by a professional geotechnical engineer and professional engineering geologist. Further, the County requires conformance with County Grading and Building Codes (Chapters 14 and 10, respectively, of the County Code) to address potential geologic hazards.
Comprehensive Plan – Land Use Element	Policy 3-14 / Hillside and Watershed Protection Policy 2	All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion	**Potentially Consistent with Mitigation.** Residential and mixed use development occurring as a result of the proposed Project would generally be sited within the existing Urban Area such that it would be consistent with existing site topography, soils, geology, and hydrology. Where development occurs in less-developed Inner-Rural or Rural Areas, the potential could exist for changes to these characteristics. However, all development would be required to comply with California Building Code Chapter 70 standards, which include certification of grading plans, cut and fill, and erosion control by a professional geotechnical engineer and professional engineering geologist. Further, the County requires

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		or other hazards shall remain in open space.	conformance with County Grading and Building Codes (Chapters 14 and 10, respectively, of the County Code) to address potential geologic hazards. Further, **MM BIO-1** and **MM BIO-2** require standard setbacks from native habitats and the location of new development outside the canopy dripline of native trees, respectively.
Comprehensive Plan – Land Use Element	Hillside and Watershed Protection Policy 3, Hillside and Watershed Protection Policy 5	For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season. Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized immediately with planting of native grasses and shrubs, appropriate nonnative plants, or with accepted landscaping practices.	**Potentially Consistent.** Residential and mixed use development occurring as a result of the proposed Project that would involve substantial grading or clearing of land would be subject to compliance with relevant plans and practices, including the County's Grading Ordinance, Building Code, and adopted construction best management practices (BMPs), such as the California Stormwater Quality Association's *Construction Handbook*. Site-specific standards and development plans may be required on a case-by-case basis. These would include measures to minimize exposure and erosion and ensure appropriate slope stability, soil protection, and sediment control measures, as necessary.
Hazards & Hazardous Materials			
Comprehensive Plan – Seismic	Geologic and Seismic Protection Policy 1	The County shall minimize the potential effects of geologic, soil, and	**Potentially Consistent.** Construction of residential development occurring as a result of the proposed Project would be subject to compliance with relevant policies from the

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
Safety and Safety Element		seismic hazards through the development review process.	Seismic Safety and Safety Element, the California Building Code, and the California Fire Code, as well as the Santa Barbara County Fire Department (SBCFD) development standards, to ensure that new development minimizes risks to life and property in areas of high hazard risk and that stability and structural integrity are sufficient to avoid contributions to erosion or alterations to natural landforms. In addition, all development requiring substantial grading, cut, and fill activities would need to comply with the County's Grading Ordinance (Chapter 14 of the County Code), which contains measures that aim to minimize erosion and ensure soil stability and sediment control during construction.
Comprehensive Plan – Seismic Safety and Safety Element	Fire Policy 9	The County shall minimize the potential effects of fire hazards through the development review process pursuant to State law.	**Potentially Consistent with Mitigation.** As described in Section 3.16, *Wildfire*, the proposed Project would result in the development of housing within or adjacent to Very High Fire Hazard Severity Zones (FHSZ) and the designated Wildland-Urban Interface (WUI), particularly within the Eastern Goleta Valley, Carpinteria, Orcutt, Mission Hills, and Vandenberg Village. New residential development in these wildfire hazard areas could result in increased wildfire hazards due to steep slopes, substantial natural vegetation fuel sources, and "sundowner" winds. However, all projects would be required to comply with applicable Santa Barbara County Fire Department (SBCFD) development standards, which would help to minimize the effects of fire hazards on new development. Additionally, **MM WF-1** would also help to ensure adequate defensible space is provided around future development to reduce wildfire risks.
Hydrology & Water Quality			
Comprehensive Plan – Land Use Element	Flood Hazard Area Policy 1	All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting	**Potentially Consistent with Mitigation**. As described in Section 3.9, *Hydrology and Water Quality*, it is estimated that up to 338 acres of potential residential uses would be zoned within an existing flood hazard area. For example, the majority of Rezone Site No. 22 (Key Site 11) in Orcutt is mapped within the 100-year floodplain for Orcutt Creek. Under the Housing

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		improvements in accordance with HUD regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finish floor elevations are above the projected 100-year flood elevation, as specified in the Flood Plain Management Ordinance.	Element Update, Rezone Site No. 22 (Key Site 11) could be developed with a potential of 945 new residential units and 32,670 square feet of commercial development based on proposed site zoning. **MM HWR-1** would require that all new development on sites affected by special flood hazards comply with the design requirements listed in the most recently adopted Flood Control District's Standard Conditions for Project Plan Approval. These standard conditions would require that all development complies with applicable requirements of Chapters 15A, 15B, and 24-7 of the County Code, prepare site plans showing existing mapped special flood hazards, and as applicable, mitigate flood risks, site runoff, and onsite and offsite flooding through modification of the site and implementation of special improvements. With implementation of **MM HWR-1**, the proposed Project would be potentially consistent with this policy.
Comprehensive Plan – Seismic Safety and Safety Element	Flood Policy 2	The County shall evaluate whether development should be located in flood hazard zones, and identify construction methods or other methods to minimize damage if development is located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(ii).	
Comprehensive Plan – Land Use Element	Hillside and Watershed Protection Policy 4	Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained throughout the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.	**Potentially Consistent**. As described in Section 3.9, *Hydrology and Water Quality*, new housing development and changes in land use associated with the Potential Rezone Program would result in increases in impervious surfaces, which in turn would increase stormwater runoff and discharges to drainage systems and the potential to cause flooding in areas without sufficient drainage facilities. However, all potential future development would be required to comply with the National Pollutant Discharge Elimination System (NPDES) MS4 permit, the County's Stormwater Management Plan (SWMP), and the Regional Water Quality Control Board (RWQCB) Resolution R3-2013-0032. Compliance with these regulations would minimize impervious surfaces at a site, capture stormwater onsite, decrease surface water flows, and slow runoff rates, all of which would mitigate the potential for onsite and offsite flood flows associated with housing development. Further, future
Comprehensive Plan – Land Use Element	Hillside and Watershed Protection Policy 6	Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		and surface conditions as a result of development. Water runoff shall be retained on-site whenever possible to facilitate groundwater recharge.	development in a flood hazard area would be required to comply with County Code Chapter 15A, Floodplain Management and 15B Development Along Watercourses. These regulatory standards are designed to ensure future development of a site reduces or addresses flood hazards and prevents or regulates the construction of barriers that might unnaturally divert floodwaters or increase flood hazards in other areas.
Comprehensive Plan – Land Use Element	Hillside and Watershed Protection Policy 7	Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.	**Potentially Consistent**. As described in Section 3.9, *Hydrology and Water Quality*, the introduction of sediment or pollutants could occur from spills and leaks of petroleum products or other chemicals associated with construction equipment, vehicles, and pumps. Grading required to construct new buildings would occur per the County's Grading Ordinance (County Code Chapter 14), which requires that if grading for a proposed housing site exceeds 1 acre, the site would also be subject to a General Construction Permit from the RWQCB. Additionally, required compliance with the County's Grading Ordinance, Building Code, and adopted construction BMPs, such as the California Stormwater Quality Association's *Construction Handbook* would require site-specific standards and development plans on a case-by-case basis to minimize exposure and erosion and ensure appropriate slope stability, soil protection, and sediment control measures, as necessary. Further, all potential future development would be required to comply with the NPDES MS4 permit and the County's SWMP. Compliance with these regulations would minimize impervious surfaces at a site, capture stormwater onsite, decrease surface water flows, and slow runoff rates.
Land Use & Planning			
Comprehensive Plan – Land Use Element	Land Use Development Policy 2	The densities specified in the Land Use Plan are maximums and may be reduced if it is determined that such reduction is warranted by conditions specifically applicable to a site, such	**Potentially Consistent**. The proposed Project would increase the maximum allowed density for County residential and mixed use land use designation and zoning districts from 30 to 40 du/ac. The proposed Project also would set minimum densities, which may create conflicts if reductions in densities

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		as topography, geologic or flood hazards, habitat areas, or steep slopes. However, density may be increased only under programs of the Housing Element and the Residential Agricultural Unit (RAU) program.	are required to address topography, geologic or flood hazards, habitat areas, or steep slopes. However, the Housing Element Update includes a provision to allow for lower densities than the minimum if site constraints would preclude the development of a housing site included in the sites inventory prepared for the Housing Element Update.
Comprehensive Plan – Land Use Element	Land Use Development Policy 3	No urban development shall be permitted beyond boundaries of land designated for urban uses except in neighborhoods in rural areas.	**Potentially Consistent**. As analyzed in this section, the proposed Project would primarily create the potential for new housing on infill sites in the existing Urban Area. The proposed Project would facilitate some new housing development in the Rural Area. For example, Rezone Site No. 11 (Glen Annie) is located in the Rural Area and would transform a golf course surrounded by natural areas and agricultural uses into an urban residential neighborhood with up to 40 du/ac and up to four or more stories. Development of this site along with other sites in the Rural area would require an expansion of the Urban Area boundary. If selected to accommodate the County's RHNA plus a 15 percent buffer for lower- and moderate-income affordability levels, the Board would also be required to expand the Urban Area boundary. Such expansion of the Urban Area would ensure that housing development on selected sites would be consistent with the Land Use Element.
Eastern Goleta Valley Community Plan	Policy LUR-EGV-1.4	Multifamily or mixed use development plans shall be designed to include a range of unit sizes and designs to maximize the affordability, flexibility, and appeal of the residential properties to meet local housing needs.	**Potentially Consistent.** As described in this section, a substantial portion of the housing enabled by the Housing Element Update would be located in the Goleta and Eastern Goleta Valley planning areas. Based on the sites inventory prepared for the Housing Element Update, housing sites would include a range of multifamily housing types, sizes, and affordability levels in potential County-owned sites, pending projects, and potential rezone sites, as well as single-family housing on existing vacant sites. In developing the Housing Element Update, the County assumed a minimum 75 percent of units would be affordable in the lower- and moderate-income categories for sites proposed for rezoning to DR with a
Goleta Community Plan	Policy LUR-GV-2	The County shall actively pursue the goal of providing that 50% of the total new residential development in the Goleta Planning Area be priced in the affordable range per the County's	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		Housing Element and State Law. The provision of 50% affordable units shall remain the target goal until such time as that number is updated in the County's Housing Element.	minimum of 20 du/ac. Based on the Housing Element Update, the housing sites identified would meet local housing needs as defined by the 6th Cycle RHNA.
Goleta Community Plan	Policy LUR-GV-5	The County shall continue to ensure that the range of housing opportunities in the Goleta Valley remains broad and sufficient enough to meet all housing needs.	
Eastern Goleta Valley Community Plan	Policy LUR-EGV-2.2	**Residential Neighborhood Development**: Residential Neighborhood Developments are defined as residential subdivisions for ten (10) or more lots, and/or development plans for ten (10) or more units on residentially designated properties. Residential Neighborhood Development proposals shall be considered only when: the development is in the Urban Area or EDRN, and the resulting Residential Neighborhood Development comprehensively considers the features, resources, and constraints of the property onsite and adjacent to the development area to assess the cumulative effect of the development, and the scale, height, architectural style, design, and concentration of structures/density of structures proposed for the development are compatible with surrounding neighborhoods to the	**Potentially Consistent with Mitigation.** As described in this section, a substantial portion of the housing enabled by the Housing Element Update would be located in the Goleta and Eastern Goleta Valley planning areas. Based on the sites inventory prepared for the Housing Element Update, housing sites would be located primarily in the Urban Area (only existing vacant sites lie outside the Urban Area within the Eastern Goleta Valley Planning Area). Development of these sites would be subject to compliance with adopted development and objective standards of the County's zoning ordinances, requirements to ensure adequate services (e.g., water, wastewater) are provided to serve proposed development, County Public Works engineering and design standards, and fire code standards, as well as the requirements of the California Building Code. Compliance with these standards is required for all development enabled under the Housing Element Update, which would help to ensure adequate design of future development to address issues such as scale, height, architectural style, design, sustainability, safety, resource protection, and multi-modal connectivity. Additionally. **MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** would require the County to amend the County's zoning ordinances to allow public open space (i.e., public parks and recreation), commercial recreation, and neighborhood-serving commercial uses as a component of

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		greatest extent feasible, and the development is designed to be energy- and resource efficient, and the development is designed in accordance with the County's applicable design guidelines, and the development includes provisions for the community's social, economic and cultural well-being, and health and safety, such as public and private open spaces, habitat preservation or restoration, multimodal transportation improvements, visual resource enhancements, community parkland (active and/or passive), and/or community gardens.	housing projects on sites zoned DR. This measure would change the County's DR zoning district to support the needs of future residents and the community as a whole consistent with the Comprehensive Plan. This measure would also help address impacts related to public parks, ~~and~~ recreation, and trails (Section 3.13, *Public Services and Recreation*).
Eastern Goleta Valley Community Plan	Policy LUR-EGV-2.4	Residential and Mixed use Neighborhood Development should be considered ideally located: 1. Within walking distance (0.25 miles maximum) of commercial/service nodes and employment centers, schools, and/or parks and recreation facilities. 2. When connected to multimodal transportation corridors, Community Corridors, and public transit routes and stops.	**Potentially Consistent with Mitigation**. As described in this section and Section 3.14, *Transportation*, the Housing Element Update proposes a land use pattern for residential and mixed use development countywide that supports sustainable community planning. The proposed Project would bring new residential development to communities currently served by active transportation infrastructure, including sidewalks, bike lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. This is especially true for residential and mixed use development projects located within the South Coast (i.e., Eastern Goleta Valley), which support reduced VMT relative to other HMAs (Impact T-2). Further, in Eastern Goleta Valley, Hollister Avenue, Calle Real, and Turnpike Road are defined as Eastern Goleta Valley Corridors and prioritized for multi-modal improvements in County transportation project planning. Most of the potential South Coast housing sites are located along these corridors and would be well-served by ongoing multi-

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
			modal improvements to these roadways. As such, the proposed Project would promote more sustainable land use patterns countywide and create opportunities for alternative transportation. Additionally, **MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** would require the County to amend the County's zoning ordinances to allow public open space (i.e., public parks and recreation), commercial recreation, and neighborhood-serving commercial uses as a component of housing projects on sites zoned DR. This measure would change the County's DR zoning district to support the needs of future residents and the community as a whole consistent with the Comprehensive Plan. This measure would also help address impacts related to public parks and recreation (Section 3.13, *Public Services and Recreation*).
Eastern Goleta Valley Community Plan	Policy ENV-EGV-1.1	Restrict urban-style development to the Urban Area, prioritizing infill and redevelopment strategies, to protect coastal and rural area environmental resources.	**Potentially Consistent.** As analyzed in this section, the proposed Project would not facilitate new housing development in the Rural Area of Eastern Goleta Valley.
Orcutt Community Plan	Policy LUR-O-1	Policy LUR-O-1: Consistent with the Housing Element, the County shall encourage the provision of a mix of affordable units on parcels within the Orcutt Planning Area.	**Potentially Consistent.** Based on the sites inventory prepared for the Housing Element Update, potential housing sites within Orcutt would include a range of multifamily housing types, sizes, and affordability levels in potential County-owned sites, pending projects, and potential rezone sites, as well as single-family housing on existing vacant sites. Based on the Housing Element Update, the potential housing sites identified would meet local housing needs as defined by the 6th Cycle RHNA.
Orcutt Community Plan	Policy LUR-O-2	Future growth and development shall occur in a manner which minimizes construction related impacts on the community.	**Potentially Consistent with Mitigation**. As analyzed in Section 3.14, *Transportation*, temporary impacts to the traffic safety environment can occur during construction when heavy haul trucks, cement trucks, materials and equipment delivery trucks, construction worker vehicles, and other construction-related vehicles travel along freeways and the local transportation network. **MM T-2** would require the preparation of individual Construction Traffic and Access

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
			Management Plans for residential and mixed use development involving encroachment into the public right of way to address construction-related impacts. Further, as analyzed in Section 3.11, *Noise*, temporary noise would be generated from construction activities, including the modification or potential demolition of existing uses, construction of new residential or mixed use developments, and other similar types of construction related to housing development. **MM NOI-1** and **MM NOI-2** would apply to all residential and mixed use projects to control construction noise generated from specific equipment and phases of development, as well as limit the duration and timing of construction to minimize adverse impacts on sensitive receptors to address construction-related impacts.
Orcutt Community Plan	Action LUR-O-4.1	The County shall encourage development which preserves the character of existing neighborhoods, particularly as to key natural undeveloped open space preservation, traffic safety on local roads and preservation of important natural features. Where a proposed development project requires redesignating the property to a density exceeding that of all contiguous residential parcels by more than 50%, the County may consider reducing the proposed density or denying the project in order to prevent a substantial deterioration of these factors.	**Potentially Consistent**. As described in Chapter 2, *Project Description*, the proposed Project would increase the maximum allowed density for County residential and mixed use land use designation and zoning districts from 30 to 40 du/ac. The proposed Project also would set minimum densities, which may create conflicts if reductions in densities are required to address topography, geologic or flood hazards, habitat areas, or steep slopes. However, the Housing Element Update includes a provision to allow for lower densities than the minimum if site constraints would preclude the development of a housing site included in the sites inventory prepared for the Housing Element Update.
Orcutt Community Plan	Policy LUC-O-3	Mixed use development on land designated for commercial use shall be encouraged where appropriate.	**Potentially Consistent**. As described in Chapter 2, *Project Description*, the Housing Element Update supports mixed use development in existing urbanized areas as a key strategy to meet the County's RHNA and reduce VMT. Based on the sites

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
			inventory prepared for the Housing Element Update, several mixed use projects on commercial land in Orcutt could provide housing consistent with this policy.
Los Alamos Community Plan	Policy LUR-LA-1.1	In order to locate higher density residential units within walking distance to shopping and employment opportunities, multi-family residential development should be concentrated within and close to the community's commercial core along Bell Street.	**Potentially Consistent**. As described in Chapter 2, *Project Description*, the Housing Element Update supports housing development on infill sites in existing urbanized areas as a key strategy to meet the County's RHNA and reduce VMT. Based on the sites inventory prepared for the Housing Element Update, existing vacant sites and pending projects in Los Alamos are located within 0.5 miles of Bell Street and could provide housing consistent with this policy.
Montecito Community Plan	Policy LUG-M-1.1	The County shall recognize that the Montecito Planning Area is a community nearing its full buildout potential, and shall require that development respect its small town, semi-rural character.	**Potentially Consistent**. As described in Chapter 2, *Project Description*, the sites inventory prepared for the Housing Element Update indicates Montecito does not have substantial capacity for additional housing. Rather, the sites inventory in Montecito comprises only existing vacant sites and pending projects that would be developed subject to the County's discretionary review process consistent with this policy.
Summerland Community Plan	Policy LU-S-3	Future growth and development shall occur only as resources and services become available and in a manner which minimizes construction related impacts on the community.	**Potentially Consistent with Mitigation**. Based on the sites inventory prepared as part of the Housing Element Update, there are no sites in the inventory in Summerland other than existing vacant sites that would be developed consistent with existing zoning. As analyzed in Section 3.14, *Transportation*, temporary impacts to the traffic safety environment can occur during construction at these sites when heavy haul trucks, cement trucks, materials and equipment delivery trucks, construction worker vehicles, and other construction-related vehicles travel along freeways and the local transportation network. **MM T-3** would require the preparation of individual Construction Traffic and Access Management Plans for residential and mixed use development involving encroachment into the public right of way to address construction-related impacts. Further, as analyzed in Section 3.11, *Noise*, temporary noise would be generated from construction activities, including the modification or potential

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
			demolition of existing uses, construction of new residential or mixed use developments, and other similar types of construction related to housing development. **MM NOI-1** and **MM NOI-2** would apply to all residential and mixed use projects to control construction noise generated from specific equipment and phases of development, as well as limit the duration and timing of construction to minimize adverse impacts on sensitive receptors to address construction-related impacts. Further, before the final approval of a project and issuance of building permits, adequate services to service proposed development must be demonstrated, which would ensure future growth and development occurs only as resources and services are available.
Santa Ynez Community Plan	Policy LUT-SYV-1.1	Consistent with the Housing Element, the County shall encourage the provision of a mix of affordable units on parcels within the Santa Ynez Community Plan Area.	**Potentially Consistent.** As described in this section, a relatively smaller portion of the housing enabled by the Housing Element Update would be located in Santa Ynez Valley, largely because housing needs in this region are not as great as other, more urbanized HMAs. Based on the sites inventory prepared for the Housing Element Update, housing sites would include a range of multifamily housing types, sizes, and affordability levels in potential County-owned sites, pending projects, and potential rezone sites, as well as single-family housing on existing vacant sites. Based on the Housing Element Update, the potential housing sites identified would meet local housing needs as defined by the 6th Cycle RHNA.
Noise			
Comprehensive Plan – Noise Element	Policy 1	In the planning of land use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.	**Potentially Consistent with Mitigation.** As analyzed in Section 3.11, *Noise*, the proposed Project could result in residential uses in existing or future noise environments that exceed the County's noise thresholds established by the Noise Element. **MM NOI-1** and **MM NOI-2** would apply to all residential and mixed use projects to control construction noise generated from specific equipment and phases of

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
Comprehensive Plan – Noise Element	Policy 5	Noise-sensitive uses proposed in areas where the Day-Night Average Sound Level is 65 dB or more should be designed so that interior noise levels attributable to exterior sources do not exceed 45 dB LDN when doors and windows are closed. An analysis of the noise insulation effectiveness of proposed construction should be required, showing that the building design and construction specifications are adequate to meet the prescribed interior noise standard.	development, as well as limit the duration and timing of construction to minimize adverse impacts on sensitive receptors. **MM NOI-2** would also require housing projects under the Housing Element Update that are proposed in areas where existing or future transportation noise levels exceed the County's threshold of 65 dBA to include a noise study to assess existing and future noise conditions and identify site-specific noise attenuation techniques to ensure interior noise levels are maintained below 45 dB day-night average sound level (L_{dn}). Further, **MM T-1** would reduce the proposed Project's Annual average daily trips (ADT) to help ensure its contribution to ambient roadway noise is substantially reduced on local roadways.
Comprehensive Plan – Noise Element	Policy 6	Residential uses proposed in areas where the Day-Night Average Sound Level is 65 dB or more should be designed so that noise levels in exterior living spaces will be less than 65 dB LDN. An analysis of proposed projects should be required, indicating the feasibility of noise barriers, site design, building orientation, etc., to meet the prescribed exterior noise standard.	
	Policy 3	For protection of sensitive activities, as well as the airports, noise-sensitive land uses, other than hotels and motels insulated to the level prescribed in the State Noise Insulation Standards, should not be permitted within the 65 dB CNEL contour of any airport as projected in the County Airport Land Use Plan. In no case shall institutional land uses,	**Potentially Inconsistent**. As analyzed in Section 3.11, *Noise*, airports in the county generate high noise levels and residential uses are incompatible with airport noise above 65 dB L_{dn}. Up to 41.1 acres of potential new housing would be subject to airport noise levels of 60-65 dB L_{dn} generated by either Santa Barbara Airport or Santa Maria Airport. Given the potential location of housing projects in higher noise areas associated with airports, the proposed Project may expose

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		such as schools, hospitals, convalescent homes, and other in-patient health care facilities, be permitted within the boundaries of such 65 dB CNEL contour.	people residing or working within the vicinity of airports to excessive noise levels.
Comprehensive Plan – Noise Element	Policy 4	Residential use should be avoided within the 65 dB CNEL contour of any airport and under airport traffic patterns.	
Comprehensive Plan – Noise Element	Policy 13	The Board of Supervisors should recommend to the City of Santa Barbara that measures be taken to assure compliance of the Santa Barbara Municipal Airport with California Airport Noise Standards. Approximately 280 housing units are located within the 65 dB CNEL contour established for the Airport. California Airport Noise Standards require that, by January 1, 1986, no residential dwellings (except acoustically treated units) exist within the Airport's 65 dB CNEL contour. The City of Santa Barbara should begin planning now to meet these requirements.	
Public Services, Utilities, and Recreation			
Comprehensive Plan – Land Use Element	Land Use Development Policy 4	Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e.,	**Potentially Consistent**. Prior to final approval and issuance of building permits for any housing project, adequate public or private services and resources (i.e., water, sewer, roads) must be demonstrated to serve the proposed development, which would ensure future growth and development occurs only as resources and services are available. Further, the Housing Element Update proposes Program 14, Water and Serwer

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.	Services, and Program 15, Water and Sewer Service Priority for Affordable Housing, which would help to support the expansion of services to ensure adequate service to future housing development prior to project approval.
Comprehensive Plan – Land Use Element	Land Use Development Policy 5	Within designated urban areas, new development other than that for agricultural purposes shall be serviced by the appropriate public sewer and water district or an existing mutual water company, if such service is available.	
Comprehensive Plan – Land Use Element	Parks/Recreation Policy 1	Bikeways shall be provided where appropriate for recreational and commuting use.	**Potentially Consistent with Mitigation**. As analyzed in Section 3.14, *Transportation*, the Housing Element Update addresses regional housing needs but is not required to conduct community planning or circulation planning. The existing Circulation Element and transportation impact mitigation fees are out of date and do not account for the multi-modal needs of the proposed Project, including bikeways. **MM T-3** would require an update to the County's Capital Improvement Program (CIP), Transportation Improvement Plans (TIPs), and the transportation impact mitigation fees to fully fund and implement the required improvements, which could include bikeways and other improvements appropriate for recreational and commuting use.
Comprehensive Plan - Lompoc Area	B-1 & B-2	To the maximum extent feasible, development projects should dedicate land and construct, public	**Potentially Consistent with Mitigation**. As analyzed in Section 3.13, *Public Services and Recreation*, the County currently has several policies in place that aim to preserve,

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
Interpretive Guidelines		or privately developed parks, athletic fields, and trails for public use. Examples include playing fields, basketball courts, playground equipment, etc. Developers and the County shall work together to provide regional park facilities in accordance with the findings of the Regional Needs Assessment for Parks as adopted by the Board of Supervisors. Development projects should include public and/or private open space dedications that preserve natural areas.	expand, and fund recreational facilities. Ordinance 4317 enacts the Quimby Act, which requires that new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances). As described in Section 3.13.3, *Regulatory Setting,* the Quimby Act allows fees to be collected for up to 5 acres of parkland per 1,000 residents to serve the needs of residents of the subdivision and the greater public. County Ordinance 4348 also imposes development mitigation fees for new residential development. These fees are to be consistent with current Quimby Act fees. The Mello-Roos Community Facilities Act of 1982 and the Landscaping and Lighting Act of 1972 also help to ensure funding for the construction or maintenance of new or existing parks. The County has also adopted development standards for various zoning districts that require the provision of common open space and common recreational facilities onsite. Under these existing development standards, for the DR zone district, a minimum of 40 percent of the net site area shall be reserved for the life of the project as common open space (LUDC Section 35.23.060[B]). These open space requirements are reduced to a minimum of 30 percent of the net site area for project sites with DR zoning that qualify as affordable housing development projects (LUDC Section 35.23.060[D][2][b]). Development enabled under the Housing Element Update would result from the rezoning of sites to the DR zone district under proposed Program 1, Adequate Sites for RHNA and Monitoring of No Net Loss (Program 1). As a result, the development of DR-zoned sites would be required to reserve some acreage of each site as common open space. Additionally, **MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** would require the County to amend the County's zoning ordinances to allow public open space (i.e., public parks and recreation) and commercial recreation uses as a component of housing projects on sites zoned DR. This measure would change the County's DR zone district to support the needs of future residents and the community as a whole consistent with the Comprehensive

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
			Plan. This measure would also help address impacts related to public parks and recreation (Section 3.13, *Public Services and Recreation*).
Goleta Community Plan	Policy WAT-GV_1	For discretionary projects which would result in a net increase in water use, there shall be a sufficient supply of water to serve known existing commitments plus the proposed project. This policy shall be implemented consistent with the direction of Policy WAT-GV-2	**Potentially Consistent**. Prior to final approval and issuance of building permits for housing projects enabled by the Housing Element Update, adequate services to service proposed development must be demonstrated, which would ensure future growth and development occurs only as resources and services are available. Further, the Housing Element Update proposes Program 14, Water and Serwer Services, and Program 15, Water and Sewer Service Priority for Affordable Housing, which would help to support the expansion of services to ensure adequate service to future housing development prior to project approval. In addition, future development would be subject to the County's existing development impact fee requirements to help mitigate public service impacts and fund necessary improvements. While not required to ensure consistency with these policies, **MM UWS-1** would also help to ensure consistency with this policy by requiring applicants to secure adequate utilities.
Goleta Community Plan	Policy WAT-GV-2	The County, in its land use planning decision, shall consider the water resources analysis as contained in the Goleta Water Plan, as adopted by the Goleta Water District.	
Eastern Goleta Valley Community Plan	Policy SF-EGV-1.1	The County shall ensure that required public services and facilities to meet the needs of development are constructed and operational concurrently with, or in advance of, the construction and operation of development.	
Eastern Goleta Valley Community Plan	Policy SF-EGV-1.2	The County shall encourage developers to use innovative measures to mitigate the public service impacts from their developments in addition to standard in-lieu fees, including, but not limited, to payment of development impact fees; direct public service facility improvements; creation of public service facility benefit assessment districts etc.	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
Eastern Goleta Valley Community Plan	Policy WAT-EGV-1.1	For projects that would result in a net increase in water use, there shall be a sufficient supply of water to serve existing commitments plus the proposed project.	
Eastern Goleta Valley Community Plan	Policy WAT-EGV-1.7	Subdivisions or projects that result in increased residential density shall be analyzed to ensure that sufficient supply of water exists to serve existing commitments and the proposed project.	
Orcutt Community Plan	Policy WW-O-2	Prior to discretionary approval of new development, the County shall make a finding that there will be adequate capacity and availability for Laguna County Sanitary District (LCSD) to serve the new development.	
Orcutt Community Plan	Policy WAT-O-2 & DevStd Wat-O-2.1/DevDtd Wat-O-2.2	In order to be found consistent with Land Use Development Policy No. 4 (LUDP#4), the water demand of new discretionary development must be offset by long-term supplemental water supplies that do not result in further overdraft of the local groundwater basin and that are adequate to meet the project's net water demand as determined by the County considering appropriate reliability factors as determined by County Water Agency. To demonstrate an adequate long-term supplemental water supply, projects must comply with the following	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		development standards: Prior to discretionary action by any County decision-maker on new development, the applicant shall provide one of the following: A "Can and Will Serve" letter from California Cities Water Company dated before July 1997 An "Intent to Serve" letter from California Cities Water Company or other water purveyor(s) including draft contract(s), if any, demonstrating to the County's satisfaction that the development's net water demand will be offset by a long-term supplemental water supply and that the development will have a continuing right to obtain water equal to that of the water purveyor's other customers. Contract(s), if any, must include terms consistent with the requirements of DevStd WAT-O-2.2 Prior to discretionary action on new development, the applicant must demonstrate adequacy of the water supply proposed to serve the project, unless the applicant has satisfied DevStd WAT-O-2.1 #1 above. This demonstration shall be based on the following information, which must be provided prior to application	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		completeness (*See Orcutt Community Plan, Page 178 - 179*)	
Orcutt Community Plan	Policy OS-O-1	When considering approval of development projects within or adjacent to areas identified for potential public open space (see Table 21 of the Orcutt Community Plan), the County shall review the appropriate mix of public and/or private open space, and to the maximum extent feasible require dedication of contiguous areas identified as a priority for public acquisition as public open space based on the following criteria: location within designated open space corridors and proximity of adjacent open space; the criteria and intent of the PRD zone district; and demonstration of rough proportionality between the level of permitted development, its associated impact, and the open space dedication, consistent with applicable laws.	**Potentially Consistent with Mitigation** As analyzed in Section 3.13, *Public Services and Recreation*, the potential increase in population within Orcutt under the proposed Project would substantially increase the number of people that use existing parks and potentially degrade areas such as the ballfields and playgrounds, either physically or through overcrowding. Each housing project enabled under the Housing Element Update would be required to comply with applicable open space requirements and/or in-lieu fee payment under the County's existing Quimby Fee or Development Impact Mitigation Fee program. Further, **MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** would require the County to amend the County's zoning ordinances to allow public open space (i.e., public parks and recreation), commercial recreation, and neighborhood-serving commercial uses as a component of housing projects on sites zoned DR. This measure would change the County's DR zone district to support the needs of future residents and the community as a whole consistent with the Comprehensive Plan. This measure would help address impacts related to public parks and recreation, consistent with this policy (Section 3.13, *Public Services and Recreation*).
Orcutt Community Plan	Policy OS-O-2	The County's priority for acquisition of public open space is on PRD sites within and adjacent to areas identified for potential public open space (see Table 21 of the Orcutt Community Plan). The County should consider acceptance or acquisition of public open space in other zone districts based on the criteria in Policy OS-O-1, the importance of the	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		site's natural resources and recreation potential, and the level of public and property owner interest.	
Santa Ynez Valley Community Plan	Policy WW-SYV-1	Development and infrastructure shall achieve a high level of wastewater treatment, in order to best serve the public health and welfare.	**Potentially Consistent**. As analyzed in Section 3.15, *Utilities and Water Supply*, potential development resulting from the proposed Project in Santa Ynez Valley would not generate additional wastewater that would exceed the available permitted and design treatment capacity of Los Alamos Community Services District (CSD) and Santa Ynez CSD. Based on this buildout, development enabled under the Housing Element Update may generate an additional 0.06 MGD, which would be within the remaining treatment and discharge capacity of Santa Ynez CSD's wastewater treatment system. Nevertheless, **MM UWS-1** would also help to ensure consistency with this policy by requiring applicants to secure adequate utilities.
Santa Ynez Valley Community Plan	Policy WAT-SYV-2	Existing and future water supply and quality shall continue to be periodically evaluated with specific measures identified to maintain adequate supply levels and quality, if deemed necessary.	**Potentially Consistent**. As analyzed in Section 3.15, *Utilities and Water Supply*, given the existing surplus supply of municipal water for water agencies in the Santa Ynez Valley, the proposed Project is not anticipated to result in a substantial adverse increase in demand for municipal water supplies, such that future increases in water demand could not be reliably met or such that expansion or improvement of the current water supply infrastructure would be required. Nevertheless, **MM UWS-1** would also help to ensure consistency with this policy by requiring applicants to secure adequate utilities.
Transportation			
Comprehensive Plan – Circulation Element	Policy E	A determination of project consistency with the standards and policies of this Element shall constitute a determination of project consistency with the Land Use Element's Land Use Development	**Potentially Consistent with Mitigation**. As analyzed in Section 3.14, *Transportation*, the Housing Element Update addresses regional housing needs but is not required to conduct community planning or circulation planning. Individual development projects enabled by the Housing Element Update will be required to comply with County Public Works Department requirements, including requirements to

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		Policy #4 with regard to roadway and intersection capacity.	improve roadways and intersections directly serving the project. These improvements commonly take the form of sidewalk and bicycle lane improvements, additional travel and turning lanes, intersection signalization and timing changes, pedestrian crossing, street lighting, and signage. Individual project applicants would also be required to provide payment of Transportation Impact Mitigation Fees under County Code Chapter 23C, which contribute fair-share funding to offsite transportation improvements needed to serve regional growth. However. the existing Circulation Element and transportation impact mitigation fees are out of date and do not account for the multi-modal needs of the proposed Project, including bikeways. **MM T-3** requires an update to the County's CIP, TIPs, and transportation impact mitigation fees to fully fund and implement required improvements, which could include bikeways and other improvements appropriate for recreational and commuting use. With these updates, the proposed Project would be consistent with this policy.
Comprehensive Plan - Lompoc Area Interpretive Guidelines	A-9	In order to provide community cohesiveness, new neighborhoods should be designed to provide public multi-purpose trails and transit-linkages to existing neighborhoods, schools, parks, and commercial areas.	**Potentially Consistent with Mitigation**. Many of the sites identified in the sites inventory prepared for the Housing Element Update include infill sites in the Urban Area. As infill sites, many residential and mixed use projects may have a beneficial effect of connecting existing neighborhoods to other neighborhoods, schools, parks, and commercial services, thereby improving the cohesiveness and continuity of the urban environment. Further, as analyzed in Section 3.14, *Transportation*, **MM T-1**, would require site-specific mitigation requirements that ensure each housing project design provides facilities and programs to support residents' use of transit and active transportation modes. Requirements would include filling in gaps in the sidewalk network, expanding bike infrastructure, subsidizing transit fares if transit service nearby is available, and providing bike parking. **MM T-3** requires an update to the County's CIP, TIPs, and transportation impact
Goleta Community Plan	Policy CIRC-GV-6	In its long range land use planning efforts, the County shall seek to provide access to retail, commercial, recreational, and educations facilities via transit lines, bikeways, and pedestrian trails.	
Goleta Community Plan	Policy AQ-GV-3	The County shall implement those land use patterns and transportation programs which serve to reduce	

Table 3.10-3. Proposed Project Consistency with County Comprehensive Plans and Policies (Continued)

Element/Plan	Policy Name / Number	Policy	Consistency Analysis
		vehicle trips and total vehicle miles traveled.	mitigation fees to fully fund and implement required improvements, which could include bikeways and other improvements appropriate for recreational and commuting use.
Goleta Community Plan	Policy AQ-GV-4	The County shall make mixed use development, which would encourage less commuting, a priority of land use planning.	
Eastern Goleta Valley Community Plan	Policy TC-EGV-1.9	All feasible measures to fully mitigate the transportation impacts associated with development projects, including new and innovative measures as may become available, shall be considered and encouraged.	
Orcutt Community Plan	Policy LUR-O-6	In order to provide community cohesiveness, new neighborhoods should be designed to provide circulation, pedestrian, bicycle and public transportation linkage to existing neighborhoods, schools, parks, and commercial areas.	
Santa Ynez Valley Community Plan	Policy LUT-SYV-2.1	In order to provide community cohesiveness, new neighborhoods should be designed to provide circulation, pedestrian, bicycle and public transportation linkage to existing neighborhoods, schools, parks, and commercial areas.	

Table 3.10-4. Proposed Project Consistency with Other Selected Plans and Policies

Plan	Consistency Analysis
Coastal Land Use Plan (CLUP)	**Potentially Consistent**. As described in Chapter 2, *Project Description*, the Housing Element Update focuses on existing urban communities for potential housing opportunities to accommodate the 6th Cycle RHNA. As acknowledged in Chapter 2, *Project Description*, amendments to the County's Local Coastal Program to implement certain Housing Element Update programs, including rezoning of sites within the Coastal Zone, will require certification by the California Coastal Commission. Based on the sites inventory prepared for the Housing Element Update, there are three potential rezone sites that are located completely within or partially within the Coastal Zone and the jurisdiction of the CLUP [i.e., Rezone Site Nos. 15 (Van Wingerden 1), 16 (Van Wingerden 2), and 18 (Friendship Manor)]. In addition, a small portion of Rezone Site No. 7 (Caird 3) in the Eastern Goleta Valley is located within the Coastal Zone; however, under the Housing Element Update, the portion of this parcel within the Coastal Zone would remain zoned agriculture (A-I-10) if the site were to be selected by the Board of Supervisors. Additionally, ~~numerous~~ a number of existing vacant sites and pending projects lie within the Coastal Zone. ~~all potential rezone sites and potential County-owned sites are located outside the Coastal Zone and jurisdiction of the CLUP. Only existing vacant sites and pending projects lie within the Coastal Zone.~~ Future housing development projects that implement the proposed Project and lie within the Coastal Zone~~These potential housing sites~~ would be processed subject to all CLUP policies, which implement the California Coastal Act, as well as provisions of the County's CZO. These policies apply to biological resource protection, coastal resources, public access, and other key issues and priorities of the California Coastal Act. As a result of the County's discretionary review process and CZO requirements for all potential housing sites that lie within the Coastal Zone, the proposed Project would be consistent with the CLUP. Further, resource-specific policies in the CLUP and assessment of potential conflicts are addressed in relevant sections of the Program EIR. Where applicable, each resource section includes a detailed summary of applicable plans or policies that apply to the Coastal Zone and relate to the potentially affected resources, including agricultural resources, biological resources, and others.
Airport Land Use Compatibility Plans (ALUCP)	**Potentially Consistent with Mitigation**. As analyzed in Section 3.8, *Hazards and Hazardous Materials*, and Section 3.11, *Noise*, the proposed Project would foster the development of residential uses near airports that may be inconsistent with the ALUCPs for the Santa Barbara Airport, Santa Maria Airport, and Santa Ynez Airport. Housing development would have the potential to introduce new residents underlying an airport Safety Zone and could thus present a risk of airport safety-related hazards. To help ensure consistency with the aircraft safety goals of the ALUCP and avoid airport hazards, **MM HAZ-3** would require future applicants for residential development to comply with the density and open land requirements provided in the ALUCPs for Santa Barbara Airport, Santa Maria Airport, and Santa Ynez Airport. This would require locating all primary residential development outside of Safety Zone 2. Residential development within Safety Zone 4 would be required to observe the density associated with open land requirements provided in the ALUCP. Further, based on GIS analysis of the sites inventory relative to the noise contour maps provided in the ALUCPs, it is estimated that up to 41.1 acres of potential new housing would be subject to airport noise levels of 60-65 dB L_{dn} generated by either Santa Barbara Airport or Santa Maria Airport. Potential rezone sites comprise approximately 40.2 acres (98 percent) of the area that lies within this airport noise contour, including 30.9 acres on the South Coast and 9.3 acres in the North County. Consistent with

Table 3.10-4. Proposed Project Consistency with Other Selected Plans and Policies (Continued)

Plan	Consistency Analysis
	policies of the County's Noise Element and the ALUCPs, projects located within the AIA and 65 dBA noise contour would be required to evaluate potential noise issues and be designed so that noise levels in interior and exterior spaces are properly attenuated consistent with County and ALUCP standards.
2050 Connected RTP/SCS	**Potentially Inconsistent.** The Connected 2050 RTP/SCS established objectives that are oriented towards achieving the plan's five overarching goals of promoting and protecting: 1) Environment; 2) Mobility & System Reliability; 3) Equity; 4) Health and Safety; and 5) A Prosperous Economy. To achieve these goals, the objectives of the RTP/SCS aim to foster growth and transportation improvements in a manner that protects natural resources, encourages mixed use development, focuses future growth within existing urbanized areas, reduces or limits new trip generation and VMT, provide equitable access to transit and alternative transportation, and reduce traffic congestion. The Housing Element Update supports these goals by planning for and promoting residential and mixed use development that is located in existing Urban Areas in the five HMAs of the county to help address the overall housing needs of the County, as well as the unique housing needs of specific communities or regions. The various programs proposed as part of the Housing Element Update also demonstrate the proposed Project's consistency with land use planning goals and policies Connected 2050 RTP/SCS. For instance, the programs described in the discussion of *Housing Goals, Policies, and Programs* of Section 2.3.2, *Project Components,* would serve to facilitate or encourage the development of housing which would serve to help alleviate local housing needs and improve the balance of jobs and housing throughout the county. As proposed by the Housing Element Update, planning housing in existing Urban Areas and near job centers reduces VMT and commuting in the county and aligns land use with the sustainable communities priorities put forth in the RTP/SCS and SB 375. Further, the Housing Element Update proposes a majority of housing development within urbanized areas of the South Coast specifically to address the jobs-housing balance and adhere to the County's RHNA requirements to address the primary location of housing needs. As presented in Chapter 3, *Environmental Impact Analysis,* approximately 52 percent of the overall development enabled under the Housing Element Update would be located within the South Coast. Under the proposed Project, the production of new affordable housing, especially for areas in the South Coast where jobs are highly concentrated, could potentially reduce the environmental impacts associated with long-distance commutes, especially relating to VMT, which would help to meet the goals of the RTP/SCS. In addition, within the South Coast, a majority of the future housing development would be enabled within the Eastern Goleta Valley near the Hollister Avenue Corridor, where the only High Quality Transit Corridor (HQTC) in the county exists.[2] Based on the sites inventory developed for the Housing Element Update, 79 potential housing sites lie within the HQTC in Eastern Goleta Valley, including 9 potential County-owned sites, 8 pending projects, 14 potential rezone sites, and 48 existing vacant sites. Development in this area, as well as other areas of the county in proximity to transit services and pedestrian and bicycle facilities, would help to encourage alternatives to single-occupancy vehicle trips and the use of alternative modes of transportation to reduce VMT.

[2] High Quality Transit Corridors (HQTCs) are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

Table 3.10-4. Proposed Project Consistency with Other Selected Plans and Policies (Continued)

Plan	Consistency Analysis
	However, based on the sites inventory prepared for the Housing Element Update and potential maximum buildout assumptions for this Program EIR, the proposed Project may result in new housing and population growth that would substantially exceed regional growth forecasts. (Refer to the discussion of Impact PH-1 in Section 3.12, *Population and Housing* for a detailed discussion of the Project's consistency with the projections of the Connected 2050 RTP/SCS and the Regional Growth Forecast 2050.) The objectives and policies of the RTP/SCS, particularly those relating to land use planning and congestion management, are largely based upon the regional growth forecast, which was published in 2019 and does not factor in more recent housing, population, and employment trends, including the newest 6th Cycle RHNA for Santa Barbara County. The 2023-2031 RHNA, on the other hand, was developed with future housing growth in mind and has reformed the way that housing needs are addressed in the County's Land Use Element and zoning ordinance. The regional growth forecast does not reflect the development potential associated with the proposed Project. Taken together, although the proposed Project is reasonably inconsistent with growth projections in the RTP/SCS, the goal of the proposed Project and its suite of programs as a whole is to meet the housing needs of the county, consistent with the RHNA as adopted by SBCAG. Nevertheless, given the goals and policies of the RTP/SCS are based on the regional growth forecast, the proposed Project's potential to result in growth that exceeds the regional growth forecast may indicate a potential inconsistency with the RTP/SCS.

Impact LU-3. The proposed Project could potentially cause adverse quality-of-life effects on existing communities due to traffic, noise, or other physical environmental impacts.

The County's *Environmental Thresholds and Guidelines Manual* states that although changes to quality of life resulting from a project are not treated as significant effects on the environment pursuant to CEQA, many quality of life considerations are addressed in Comprehensive Plan policies, which are the subject of this section of the Program EIR. As such, quality of life issues related to aesthetics, noise, traffic, and incompatible land use and development are discussed below to inform the environmental review and decision-making process for the proposed Project.

As described in Chapter 2, *Project Description*, the proposed Project plans for residential and mixed use development to accommodate the RHNA plus a 15 percent buffer for the lower- and moderate-income affordability levels. Based on the sites inventory prepared for the Housing Element Update, future higher-density residential and mixed use development (i.e., 20 du/ac or more) would primarily occur within the existing Urban Area on infill sites surrounded by existing development, including existing residential neighborhoods, retail commercial developments, agricultural lands, public facilities, and natural open space. Higher-density development could also rise to four or more stories in height. Further, potential housing sites are commonly clustered together to form a collection of individual projects that would be developed concurrently over the 8-year life of the Housing Element Update. As such, the housing projects that implement the proposed Project would potentially result in development at a scale, height, density, housing type, and architectural style that may not be considered compatible with nearby single-family or lower-density multiple-family neighborhoods, as

well as adjacent open space, agricultural land, commercial uses, and public facilities. Sites developed with higher-density housing may be significantly taller than surrounding developments, potentially impacting privacy and sunlight/solar access for existing residents. In the case of potential rezone sites under Program 1 of the Housing Element Update, sites that could be rezoned from agricultural uses to residential uses would have physical environmental impacts from the loss of agricultural resources and open space, which could adversely affect the quality and diversity of existing neighborhoods. Lastly, individual higher-density housing sites and clusters of housing sites that rely on existing local roads could generate traffic and related transportation noise that degrade the quality of existing neighborhoods. The environmental impacts analyzed in other sections of this Program EIR that may result from adverse quality of life effects are described further below with references to applicable resources.

As described in Section 3.1, *Aesthetics and Visual Resources*, the rural and urban residents viewer group includes all permanent and seasonal residents within the designated Urban and Rural Areas of the county. Rural residents could be highly sensitive to visual changes from land use and development because they generally experience views with relatively less dense development than in urbanized areas, within the context of panoramic views of open lands. For example, on the South Coast, Rezone Site Nos. 12 (St. Vincent's East), 13 (St. Vincent's West), and 11 (Glen Annie) are located at the base of the Santa Ynez Mountains, an area that is highly visible from the Rural Area in the foothills. Differently, urban residents are also sensitive to changes to visual character and quality when perceiving neighborhood compatibility between different properties and land uses, particularly when development is noticeably taller, denser, or architecturally different than surrounding development. For example, development of higher-density development up to four stories or more in the San Marcos Agricultural Area may be visually inconsistent with surrounding lower-density single-family homes. As this infill area would eliminate agricultural land uses and open space surrounding the existing established neighborhood, the visual change could adversely affect neighborhood compatibility and the perceived quality of life of existing residents. Further, all residents are susceptible to light pollution from new urban development affecting nighttime views and skyline alterations, which could alter the quality of existing neighborhoods. **MM AV-1 (Objective Development Standards for Multiple-Unit and Mixed Use Housing)** proposes development standards for multiple-unit and mixed use housing projects to help minimize impacts to visual resources. However, even with development standards to ensure higher-density multifamily housing projects are well-designed, these types of housing projects may continue to be visually incompatible with surrounding existing neighborhoods and land uses.

As described in Section 3.11, *Noise*, future construction of residential and mixed use developments would generate transient and continuous noise from equipment and heavy haul trucks subject to existing County grading regulations, including the County's limitation on grading hours set forth in Section 14-22 of the Grading Code. In addition, **MM NOI-1 (Construction Hours)** and **MM NOI-2 (Site-Specific Noise Study)** would apply to residential and mixed use projects to control construction noise generated from specific equipment and phases of development, as well as limit the duration and timing of construction to minimize adverse impacts on sensitive receptors. With this mitigation, the noise impacts from temporary construction would be substantially reduced and nuisance noise would be minimized and contained so as not to degrade the quality of life in adjacent neighborhoods. Operationally, the increased Project-related transportation noise on affected roadways could be substantial and exceed the County's noise threshold of 3 dBA, which is the increase in noise level that is generally perceptible to the human ear. This would be most likely on roadways carrying relatively low traffic volumes that would experience a substantial increase in traffic associated with the

proposed Project. A perceptible increase in noise could cause adverse effects on the quality of life as perceived by existing residents. Existing County noise thresholds and standards would not indicate a significant noise impact for small, quiet streets where exterior noise levels are less than 65 dBA. Yet, from residents' perspectives, increased traffic noise on small, quiet streets could be more impactful on quality of life than additional traffic on existing larger, louder streets. **MM NOI-2** would require housing projects under the Housing Element Update that are proposed in areas where existing or future transportation noise levels exceed the County's threshold of 65 dBA to include a noise study to assess existing and future noise conditions and identify site-specific noise attenuation techniques to ensure interior noise levels are maintained below 45 dB L_{dn}. Further, **MM T-1 (Site-based TDM)** would reduce the proposed Project's Annual ADT to help ensure its contribution to ambient roadway noise is substantially reduced on local roadways. While these measures would substantially reduce operational transportation noise impacts they would not address substantial increases in nuisance traffic noise on quiet streets that do not have a current or future noise level above 65 dBA (i.e., noise studies and VMT reduction may not be triggered for projects affecting small, quiet streets). Nevertheless, while an increase in traffic noise on smaller roadways could exceed 3 dBA and therefore be a perceptible change, the noise levels in these areas would remain below the significant noise threshold of 65 dBA~~; therefore, impacts would remain *significant but mitigable*.~~

As discussed in Section 3.14, *Transportation*, the construction activities associated with the residential and mixed use development enabled by the Housing Element Update could result in potentially significant construction-related impacts. However, **MM T-2 (Construction Traffic and Access Management Plan)** would require the preparation of Construction Traffic and Access Management Plans for residential and mixed use development involving encroachment into the public right of way. With the preparation and implementation of these plans, which would address construction traffic routing and control, vehicle, bicycle, and pedestrian safety, street closures, and construction parking, construction traffic would not adversely affect existing neighborhoods or quality of life. However, operationally, the increased traffic on these affected roadways could be substantial, particularly for small local roadways such as San Simeon Lane, San Marcos Lane, and Walnut Lane in Eastern Goleta Valley and Clark Avenue in Old Town Orcutt, and exceed the County's design capacities for existing roadways and intersections. The County's existing planning process requires applicants to improve roadways and intersections directly serving the project. Additionally, with the implementation of **MM T-3 (Funding and Mitigation Fee Programs Update**), the County shall update its CIP, TIPs, and the County's Transportation Impact Mitigation Fees under County Code Chapter 23C to ensure projects contribute fair-share funding to offsite transportation improvements needed to serve regional growth, including the newest 6th Cycle RHNA for Santa Barbara County. However, even with County efforts to plan regional transportation improvements to accommodate the traffic generated by the proposed Project, from residents' perspectives, increased traffic and congestion on small, neighborhood streets and local arterials could still be impactful on quality of life, while remaining below any established significance threshold. This is further discussed in Impact LU-2 above in the context of the Project's consistency with plans and policies adopted for the purposes of avoiding or mitigating an environmental effect.

Implementation of the mitigation measures described above would help to reduce significant impacts on aesthetics, noise, traffic, and incompatible land use and development associated with adverse effects on quality of life. See Impacts AV-1, AV-2, NOI-1, NOI-2, T-1, and T-3 for further discussion as it relates to the effects of these impacts on quality of life.

3.10.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of policies and initiatives in the county, as well as development projects in the county. Potential impacts relating to land use associated with the proposed Project, along with potential impacts from pending and current planning or development projects, could create cumulative impacts on such resources. Cumulative projects range from programmatic projects, such as the Countywide Recreation Master Plan and the Agricultural Enterprise Ordinance, to individual projects such as the North Fork Ranch Tentative Parcel Map Project. The most significant cumulative projects with potential impacts on land use and planning are the various housing element updates being prepared by each of the incorporated cities. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units and result in associated increases in resident populations countywide.

With respect to the potential for cumulative development to divide an established community (Impact LU-1), the proposed Project would result in an *insignificant* impact. The residential and mixed use development enabled by the Housing Element Update, including new roads, private yards, common open spaces, and other physical barriers such as fences and gates, would not divide an established community. In fact, as infill sites, many residential and mixed use projects may have a beneficial effect of connecting existing neighborhoods to other neighborhoods, schools, parks, and commercial services, thereby improving the cohesiveness and continuity of the urban environment. Therefore, the proposed Project, when considered along with the other cumulative projects, would not substantially contribute to a cumulatively significant impact.

The proposed Project would result in cumulatively considerable impacts if, in combination with other cumulative pending plans and projects, it would result in substantial adverse environmental impacts associated with inconsistencies with applicable plans and policies. Each resource section of this Program EIR addresses the cumulative environmental impacts of the proposed Project. As analyzed in this Program EIR, the proposed Project would have potentially significant and unavoidable cumulative impacts on aesthetics and visual resources, air quality, biological resources, hydrology and water quality, population and housing, transportation, utilities and water supply, and wildfire. As described in Impact LU-2, these significant environmental impacts would be potentially inconsistent with land use plans and policies. Therefore, with mitigation identified in this Program EIR, the proposed Project would substantially contribute to a cumulatively significant impact and impacts would be *significant and unavoidable*.

As described in Impact LU-3, higher-density housing projects associated with the proposed Housing Element Update could be developed up to four stories or more with reduced open space, setbacks, and other development standards. These residential and mixed use developments could degrade quality of life as a result of significant impacts to aesthetics, noise, traffic, and incompatible land use and development. These impacts could be compounded by similar developments planned for under the incorporated cities' housing element updates, which could result in similar impacts and thereby cause a cumulatively significant impact. Implementation of mitigation measures to reduce impacts on aesthetics, noise, transportation, and incompatible land use would reduce the Project's contribution to such impacts. However, the proposed Project would continue to result in a substantial contribution to a cumulatively significant impact and impacts would be *significant and unavoidable.*

3.10.4.4 Proposed Mitigation

MM LU-1. Additional Allowed Uses in Design Residential (DR) Zoning. The County shall amend the zoning ordinances for the DR Zone District to allow the following uses as part of proposed projects on sites zoned DR:

1. Open Space~~Public Parks, Recreation, and Trails~~

    a. All or a portion of required open space may be provided as public open space and developed as public parks, trails, or other public recreational facilities (e.g., sports fields or courts, playgrounds, picnic or BBQ areas, community center, pool/aquatic facility, gymnasium) to provide recreational opportunities for use by both the residents of the site and the public. In siting and designing public open space, the project shall consider the following:

        i. The need to protect public use areas historically used by the public such as beaches and trails;

        ii. The avoidance of siting of structures in hazardous areas or on steep slopes;

        iii. The protection of environmentally sensitive habitat areas and archaeological sites; and

        iv. The protection of scenic areas of the site.

    b. The County may require the applicant or Homeowner's Association to maintain all public open spaces and related facilities for a specified period after occupancy of the project or may require payment of an in-lieu fee if the County maintains the public open space and related facilities. If the applicant or Homeowner's Association is to maintain public open spaces, prior to the approval of any permits for construction, a bond or other approved financial security shall be posted guaranteeing maintenance.

2. Commercial Recreational Facilities and Neighborhood-Serving Commercial Uses

    a. Commercial recreational facilities and neighborhood-serving commercial uses (i.e., convenience store, café, corner store) may be allowed in higher-density (i.e., 20 du/ac or more) developments, provided that:

        i. Such commercial recreational facilities are accessory to and compatible with the residential uses;

        ii. Such commercial uses are accessory to the residential use and limited to those serving such day-to-day needs of residents in the immediate area such as food, pharmacy, fuel, and other incidentals;

        iii. Such commercial uses shall be an integral part of the development and accessible via active transportation modes (i.e., walking, biking) within the development; and

        iv. Such commercial uses shall not, by reason of their construction, lighting, location, manner or timing of operation, parking arrangements, signs, or other characteristics have adverse effects on residential uses within or

adjoining the development or create traffic congestion or hazards to vehicular or pedestrian traffic.

Requirements and Timing: The County shall amend the zoning ordinances for the DR Zone District within 2 years of Housing Element Update adoption.

Monitoring: County P&D shall ensure future residential development projects with DR zoning address all applicable site design features and requirements listed in this mitigation measure.

3.10.4.5 Secondary Impacts

Implementation of **MM LU-1** would not result in result in any adverse secondary impacts.

3.10.4.6 Residual Impacts

Impact LU-1. Individual housing development projects would involve the development of new roads, private yards, common open spaces, and other physical barriers such as fences and gates. However, based on the sites inventory prepared for the Housing Element Update, housing projects would not divide the existing communities surrounding the sites and impacts would be *insignificant*. As described in Section 3.14, *Transportation*, with **MM T-1** and **MM T-3** the proposed Project would be consistent with sustainable community development goals to direct new housing within existing communities and serve new residents with multi-modal and active transportation facilities. While these mitigation measures are not required to address this impact, the land use analysis indicates that the proposed Project would support infill within existing communities consistent with existing land use patterns, would not degrade multi-modal access, and would not separate existing uses from one another. Additionally, **MM T-2** would require the development of individual construction traffic and access management plans, which would ensure roadways remain open and operable during construction activities. Therefore, while not required to mitigate land use impacts, existing roadways would not be blocked, and construction would not limit access to a community or restrict movement within a community.

Impact LU-2. Based on the preliminary analysis of policy consistency, the proposed Project could result in inconsistencies with the County's Comprehensive Plan and community plans, as well as the 2050 Connected RTP/SCS. These inconsistencies relate primarily to the maximum buildout assumptions of development enabled by the Housing Element Update to meet the RHNA and affordability targets and the potential location of the potential development based on the sites inventory prepared for the Housing Element Update. While various mitigation measures identified in this Program EIR, as well as **MM LU-1** requiring amendments to the DR zone district to allow public open space and some commercial uses on DR-zoned sites, would help to ensure consistency with plans and policies, as recorded in Table 3.10-3 and Table 3.10-4, the proposed Project would exceed growth projections and develop sites in areas with significant environmental impacts that would potentially conflict with County plans and policies. The only way to fully avoid these impacts resulting from the implementation of the Housing Element Update would be to eliminate sites that are inconsistent with County plans and policies, thereby eliminating potential housing sites from future development. However, doing so would substantially reduce the flexibility for County decision-makers to meet the RHNA plus a 15 percent buffer and affordability targets. Therefore, with mitigation, impacts would be *significant and unavoidable*.

Impact LU-3. Higher-density housing projects developed up to four stories or more with reduced open space, setbacks, and other development standards could degrade quality of life significantly as a result of significant impacts on aesthetics, noise, traffic, and incompatible land use and development. Implementation of **MM AV-1**, **MM NOI-1**, **MM NOI-2**, **MM T-1**, **MM T-2**, and **MM T-3** would help to reduce significant impacts on aesthetics, noise, traffic, and incompatible land use and development associated with adverse effects on quality of life. See Impacts AV-1, AV-2, NOI-1, NOI-2, T-1 and T-3 for a discussion of the residual impacts in the context of quality of life considerations.

Section 3.11
Noise

3.11.1 Introduction

This section describes potential noise impacts that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). This section describes existing noise sources in the unincorporated areas of Santa Barbara County and reviews applicable federal, state, and local noise policies and standards. This analysis addresses temporary construction-related impacts and long-term operational noise impacts that could result from future residential and mixed use development enabled under the proposed Project.

3.11.2 Fundamentals of Sound and Noise

Sound is described in terms of the loudness and pitch of the sound. Loudness is the amplitude of sound waves combined with the reception characteristics of the ear. Pitch is the height or depth of a tone or sound, depending on the relative rapidity (frequency) of the vibrations by which it is produced. Higher-pitched signals sound louder to humans than sounds with a lower pitch.

Noise is defined as unwanted or objectionable sound that interferes with normal activities or otherwise diminishes the quality of the environment. It is usually objectionable because it is disturbing or annoying. The objectionable nature of noise can be caused by its pitch or its loudness, as well as its duration. Prolonged exposure to high levels of noise is known to have several adverse effects on people, including hearing loss, communication interference, sleep interference, physiological responses, and annoyance. (See additional discussion under *Human Response to Noise* below.)

Decibels and Frequency

Several noise measurement scales are used to describe noise. The decibel (dB) is a unit of measurement that indicates the relative amplitude (loudness) of a sound. Zero on the decibel scale is based on the lowest sound pressure that a healthy, unimpaired human ear can detect. Sound levels in decibels are calculated on a logarithmic basis. An increase of 10 dB represents a tenfold increase in acoustic energy, while 20 dB is 100 times more intense, 30 dB is 1,000 times more intense, and so on. Frequency relates to the number of pressure oscillations per second, or Hertz (Hz). The range of sound frequencies that can be heard by healthy human ears is from about 20 Hz at the low-frequency end to 20,000 Hz (20 kilohertz [kHz]) at the high-frequency end.

There is a relationship between the subjective noisiness or loudness of a sound and its level. Each 10-dB increase in sound level is perceived as approximately a doubling of loudness over a wide range of amplitudes. Because decibels are logarithmic units, sound pressure levels are not added arithmetically. When two sounds of equal sound pressure levels are added, the result is a sound pressure level that is 3 dB higher. For example, if the sound level is 80 dB when one generator is operating, then it would be 83 dB when two generators are operating at the same distance from the

observer. Doubling the amount of energy would result in a 3-dB increase in the sound level. Noise levels do not substantially change much when a quieter noise source is added to relatively louder ambient noise levels. For example, if a 60 dB noise source is added to 70 dB ambient noise levels, the resulting noise level is equal to 70.4 dB at the location of the new noise source.

Sound levels diminish as the distance from the source increases. For a point source of sound in free space, the rate at which the sound attenuates is inversely proportional to the square of the distance from the source. This means the sound level will drop 6 dB each time the distance from the source is doubled. Air and ground absorption of sound waves will further attenuate sound levels. The rate at which these factors attenuate sound depends on the frequency content of the sound, air temperature, relative humidity, terrain, and type of ground cover.

There are several methods for characterizing sound. The most common is the dBA. This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Studies have shown that dBA is closely correlated with annoyance to traffic noise. Other frequency weighting networks, such as C-weighting, or dBC, have been devised to describe noise levels for specific types of noise (e.g., explosives).

Commonly used technical acoustical terms are defined in Table 3.11-1. Table 3.11-2 shows typical A-weighted noise levels that occur in human environments.

Table 3.11-1. Definitions of Acoustical Terms

Term	Definition
Decibel (dB)	A unit describing the amplitude of sound equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20 micropascals.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in micropascals (or micronewtons per square meter), where 1 pascal is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in decibels as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 micropascals in air). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency (Hertz [Hz])	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 and 20,000 Hz. Infrasonic sounds are below 20 Hz, and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level (dBA)	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	Noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, time of occurrence, and tonal or informational content as well as the prevailing ambient noise level.

Table 3.11-2. Typical Noise Levels in the Environment

Noise Level dBA	Extremes	Home Appliances (at 3 Feet)	Speech (at 3 Feet)	Motor Vehicles (at 50 Feet)	General Type of Community Environment
120	Jet aircraft at 500 feet				
110	Jet aircraft at 1,000 feet	Chain saw			
100		Gas lawnmower		Diesel truck (not muffled)	
90		Shop tools	Shout	Diesel truck (muffled)	
80		Blender	Loud voice	Automobile at 70 mph	Major metropolis
70		Dishwasher	Normal voice	Automobile at 40 mph	Urban (daytime)
60		Air conditioner	Normal voice (back to the listener)	Automobile at 20 mph	Suburban (daytime)
50		Refrigerator			Rural (daytime)
40					
30					
20					
10	Threshold of hearing				

Source: Harris Miller Miller & Hanson Inc. 2006; California Department of Transportation (Caltrans) 2013.

Noise Descriptors

The noise environment typically includes background noise generated from both near and distant noise sources as well as sound from individual local sources. These can vary from an occasional aircraft or train passing by to continuous noise from sources such as traffic on a major road. Because sound levels can vary markedly over a short time, a method for describing either the average character of the sound or the statistical behavior of the variations is utilized. Several rating scales have been developed to analyze the adverse effect of community noise (i.e., ambient or environmental noise) on people. Since community noise fluctuates over time, these scales consider the total acoustical energy content of the noise, as well as the time of day when the noise occurs, as follows:

- **Equivalent Noise Level (L_{eq})** is the average acoustic energy content of noise for a stated period. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night. L_{eq} is one of the most frequently used noise metrics as it considers both duration and sound pressure level. Typically, L_{eq} is summed over a 1-hour period.

- **Day-Night Average Noise Level (L_{dn})** is the average A-weighted noise level during a 24-hour day obtained after the addition of 10 dB to levels measured in the night between 10:00 p.m. and 7:00 a.m. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 L_{dn}. L_{dn} is used to reflect a person's cumulative exposure to sound over a 24-hour period, expressed as the noise level for the average day of the year based on annual noise generation. The L_{dn} noise metric provides a mechanism to describe the effects of environmental noise simply and uniformly. L_{dn} is the standard noise metric used for all Federal Aviation Administration (FAA) studies of aviation noise exposure in airport communities and the U.S. Housing and Urban Development (HUD) noise compatibility guidelines for housing development. L_{dn} is also a metric for the County's thresholds for noise compatibility (County of Santa Barbara 2021).
- **Community Noise Equivalent Level (CNEL)** is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 CNEL. CNEL is often used due to its utility in identifying noise-related sleep disturbance effects, often a key community concern for increases in noise levels. Most California noise laws specify levels using the CNEL metric and most federal laws use the L_{eq} metric. CNEL is also a metric for the County's thresholds for noise compatibility (County of Santa Barbara 2021).
- **Minimum Instantaneous Noise Level (L_{min})** is the minimum noise level experienced during a given period.
- **Maximum Instantaneous Noise Level (L_{max})** is the maximum noise level experienced during a given period.

The County's noise thresholds utilize $L_{dn\ and}$ CNEL as the two metrics commonly used to describe the 24-hour average (County of Santa Barbara 2021). Both include penalties for noise during the nighttime hours (10:00 p.m. to 7:00 a.m.). CNEL also penalizes noise during the evening hours (7:00 p.m. to 10:00 p.m.). CNEL and L_{dn}, which are normally within 1 dBA of each other, are used interchangeably in this section.

Noise Propagation and Attenuation

Noise is either propagated or attenuated depending on the factors discussed below.

- **Geometric spreading:** In the absence of obstructions, sound from a single source (i.e., a "point" source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level typically attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. Highway or railway noise is not a single stationary point source of sound. The movement of vehicles on a highway or trains on a track makes the source of the sound appear to emanate from a line (i.e., a "line" source) rather than from a point. This results in cylindrical spreading rather than the spherical spreading resulting from a point source. The drop-off in sound level from a line source is typically 3 dBA per doubling of distance.
- **Ground absorption:** Usually the noise path between the source and the observer is very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation caused by geometric spreading. Traditionally, the excess attenuation has

also been expressed in terms of attenuation per doubling of distance. This approximation is done for simplification only; for distances of less than 200 feet, prediction results based on this scheme are sufficiently accurate. For acoustically "hard" sites (i.e., sites with a reflective surface, such as a parking area or a smooth body of water, between the source and the receptor), no excess ground attenuation is assumed. For acoustically absorptive or "soft" sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. When added to the geometric spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dBA per doubling of distance for a line source and 7.5 dBA per doubling of distance for a point source.

- **Atmospheric effects:** Research by the U.S. Department of Transportation (DOT) and the Federal Transit Administration (FTA) has shown that atmospheric conditions can have a major effect on noise levels (Harris Miller Miller & Hanson Inc. 2006a). Wind is the single most important meteorological factor within approximately 500 feet, whereas vertical air temperature gradients are more important over longer distances. Other factors, such as air temperature, humidity, and turbulence, also have major effects. Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lower noise levels. Increased sound levels can also occur because of temperature inversion conditions (i.e., increasing temperature with elevation).

- **Shielding by natural or human-made features:** A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor specifically to reduce noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dB of noise reduction. A higher barrier may provide as much as 20 dB of noise reduction.

In summary, noise levels from a particular source decline (i.e., attenuate) as the distance to the receptor increases. Other factors, such as the weather and reflecting or shielding by buildings or other structures, also intensify or reduce the noise level at a location. A common method for estimating roadway noise is that for every doubling of distance from the source, the noise level is reduced by approximately 3 dBA at acoustically "hard" locations (i.e., mostly asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., exposed soil or landscaping, such as grass). Noise from stationary sources – including construction noise – is reduced by approximately 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by approximately 5 dBA, while a solid wall or berm can reduce noise levels by up to 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more (Federal Highway Administration [FHWA] 2014).

Human Response to Noise

Sensitive Receptors

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound or vibration could adversely affect the current or planned land uses. Human response to noise varies widely depending on the type of noise, time of day, and sensitivity of the receptor. The definition of "sensitive uses" found in the County's *Environmental Thresholds and Guidelines Manual* includes residences, transient lodging, hospitals, and public or private educational facilities. Sensitive land uses that may be affected by the implementation of the proposed Project include:

- Residential land uses (especially during nighttime);
- Transient lodging (e.g., hotels, motels)
- Schools and libraries;
- Hospitals and medical care facilities;
- Retirement/assisted living homes;
- Parks and recreational land uses; and,
- Churches and places of worship or assembly.

Studies have shown that under controlled conditions in an acoustics laboratory, a healthy human ear can discern changes in sound levels of 1 dBA. In a normal environment, changes in the noise level of 3 dBA are considered just noticeable to most people. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as being twice as loud.

Noise and Health

Several studies have linked increases in noise with health effects, including hearing impairment, sleep disturbance, cardiovascular effects, psychophysiological effects, and potential impacts on fetal development (Wolfgang 2005). Potential health effects appear to be caused by both short- and long-term exposure to very loud noises and long-term exposure to lower levels of sound. Acute sounds (i.e., L_{AF}[1] greater than 120 dB) can cause mechanical damage to hair cells of the cochlea (the auditory portion of the inner ear) and hearing impairment (Wolfgang 2005). An L_{AF} greater than 120 dB is equivalent to a rock concert or an airplane flying overhead at 984 feet.

The World Health Organization and the U.S. Environmental Protection Agency (USEPA) consider a L_{eq} equal to 70 dBA to be a safe daily average noise level for the ear. However, even this "ear-safe" level can cause disturbance to sleep and concentration and may be linked to chronic health impacts such as hypertension and heart disease (Wolfgang 2008).

Many studies have looked at the potential health effects of chronic lower noise levels, such as traffic, especially as these noise levels affect children. In a study of school children in Germany, blood pressure was significantly higher in a group of students exposed to road traffic noise from high-traffic

[1] L_{AF} = sound level with "A" frequency weighting and fast-time weighting.

transit routes (Wolfgang 2008). A study by Kawada (2004) showed that exposure to airplane noise was found to be associated with decreased fetal body weight in pregnant women (Kawada 2004).

Noise Annoyance

People's response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to stress and annoyance. When community noise interferes with human activities or contributes to stress, public annoyance with the noise source increases. Annoyance may occur at noise levels well below levels known to cause direct physiological harm.

Annoyance is a cumulative measure of the general adverse reaction of people to noise that causes interference with speech, sleep, the desire for a tranquil environment, and the ability to use the telephone, radio, or television satisfactorily. Unwanted noise interferes with human activities by distracting attention and making activities more difficult to perform, especially when concentration is needed. Interference from noise can even make some activities (e.g., communication or sleep) virtually impossible. However, except in the case of interference with verbal communication, the degree of interference is difficult to quantify or to relate to the level of noise exposure (USEPA 1979). Several factors affect the extent of annoyance that a noise causes, including loudness, duration, frequency, and time of day or night, as well as whether the noise occurs against a backdrop of other noises or in an otherwise quiet place (FAA 2023). Further, noise perception may vary based on the individual receptor, including whether the receptor has previous experiences with intrusive noise and the overall attitude toward the noise source and noise characteristics. Noises that can be particularly annoying include pure tones (e.g., truck backup beepers), low-frequency noise (e.g., rumbling of heavy equipment), and impulsive noise (e.g., helicopters, pile drivers) (USEPA 1979).

Vibration

Vibration is sound radiated through the ground. In the context of noise, groundborne vibration is the vibration, or oscillation, of the ground, floor, and walls. The vibration of floors and walls may cause perceptible vibration, rattling of items such as windows or dishes on shelves, or a rumbling noise. The rumble is the noise radiated from the motion of the room surfaces. In essence, the room surfaces act like a giant loudspeaker causing what is called groundborne noise. Groundborne vibration is rarely annoying to people who are outdoors. Although the motion of the ground may be perceived, without the effects associated with the shaking of a building, the motion does not provoke the same adverse human reaction. In addition, the rumbling noise that usually accompanies the building vibration is perceptible only inside buildings.

Vibration Definitions & Perception

The ground motion caused by vibration is measured as particle velocity in inches per second (in/sec); in the U.S., this is referenced as vibration decibels (VdB) (Harris Miller & Hanson Inc. 2006). The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts on buildings and is usually measured in inches per second (in/sec). The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal.

Table 3.11-3. Human Response to Different Levels of Groundborne Vibration (PPV)

Human Response	Transient PPV (in/sec)	Continuous PPV (in/sec)
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.9	0.1
Severe/Disturbing	2	0.4

Source: Caltrans 2020.
Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, the movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration include construction equipment (e.g., heavy haul trucks, concrete trucks) and traffic on rough roads. If a roadway is smooth, the groundborne vibration from automobile traffic is rarely perceptible, although larger trucks carrying heavy loads can generate perceptible vibration. The range of interest (velocity level) for groundborne vibration is from approximately 50 VdB to 100 VdB. General human responses to different levels of groundborne vibration velocity levels are described in Table 3.11-3. A velocity level of 50 VdB is the typical background vibration velocity level, while a velocity level of 100 VdB is the general threshold where minor damage can occur in fragile buildings (Harris Miller Miller & Hanson Inc. 2006b).

Effects of Vibration

Vibration can cause buildings to shake and rumbling sounds to be heard. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as rock blasting, pile driving, and heavy earth-moving equipment. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.

In contrast to noise, vibration is not a common environmental problem. Ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. Similar to noise, high vibration levels are also known to affect animal behavior. High vibration levels can interfere with mating activities, stress wildlife, and disturb nesting habitats (Section 3.3, *Biological Resources*).

High levels of ground-borne vibration can damage fragile buildings, including historic structures, or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes). Factors that influence ground-borne vibration effects include the foundation type and building materials (e.g., masonry). Typical human and structural responses to vibration are shown in Table 3.11.2-4. PPV (in/sec) levels that could cause structural damage are shown in Table 3.11-5; fragile buildings in the Project area could be affected by continuous (i.e., ongoing) vibrations of 0.1 in/sec and transient (i.e., singular events) vibrations of 0.2 in/sec.

Table 3.11.211-4. Human and Structural Responses to Typical Levels of Vibration

Human/Structural Response	Vibration Velocity Level (VdB)	Typical Sources
Threshold, minor cosmetic damage to fragile buildings	100	Blasting from construction projects
Difficulty with tasks (e.g., reading a screen)	90	Bulldozers and other heavy-tracked construction equipment
Residential annoyance, transient events	80	Commuter rail, upper range
Residential annoyance, continuous events	70	Rapid transit, typical
Human threshold of perception and limit for vibration-sensitive equipment	65	Bus or truck, typical
No human response	50	Typical background vibration

Source: FTA 2018.

Table 3.11-5. Vibration Thresholds for Potential Structural Damage

Structure and Condition	Transient (in/sec)	Continuous (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1	0.5
Modern industrial/commercial buildings	2	0.5

Source: Caltrans 2020.

3.11.3 Environmental Setting

This section discusses the existing noise and vibration environment in unincorporated communities in the county, including community sources and transportation sources. Significant noise in these areas is primarily associated with transportation facilities. The County regards 60-65 dB(A) L_{dn} as the maximum exterior noise exposure compatible with noise-sensitive land uses, including residential uses. Noise in the immediate vicinity of airports, railroads, and highways may exceed County noise standards and health and welfare criteria for noise exposure to residential uses. The County requires noise-sensitive uses, including residential uses proposed in areas where the day-night average sound level is 65 dBA or greater, to be designed so that the interior noise levels attributable to the exterior sources do not exceed 45 dBA (County of Santa Barbara 2021).

Community Noise Sources

Land uses within the urbanized areas of the unincorporated county include a range of residential, commercial, agricultural, industrial, and recreational uses. Stationary sources of noise in the urban environment include machinery noise (e.g., fans) from building HVAC and utility systems, sounds generated from solid waste management facilities (e.g., dumpsters and trash hauling operations), and regular deliveries or other building services (e.g., backup beepers, loading docks, large doors, forklifts, and other equipment). Commercial, industrial, agricultural, residential, and recreational activities rarely generate noise at a magnitude or duration to cause adverse impacts on sensitive receptors. However, periodic community noise may cause nuisances that affect quality of life.



Transportation noise from highways and trains like U.S. Highway 101 at its intersection with SR 217 (top) and Amtrak service along Union Pacific Railroad (UPRR) in Goleta (bottom) can exceed exterior noise levels of 65 dBA individually, and combined can reached levels of 80 dBA or more within 50 feet of the transportation corridor. Source: Santa Barbara Newspress

In urbanized locations outside the immediate influence of major transportation noise sources, ambient day-night average levels typically range from 46 dBA to 57 dBA. Although localized noise nuisances may exist in these areas (e.g., barking dogs, amplified music, delivery trucks), generally ambient noise levels are acceptable, based on health and welfare criteria (County of Santa Barbara 2021). In residential areas, noise levels are similar to those found throughout the nation in locations the USEPA describes as "Quiet Suburban" (50 dB L_{dn}) or "Normal Suburban (55 dB L_{dn}) (County of Santa Barbara 2009). Within commercial areas, noise conditions are often associated with shopping centers and public facilities but are most commonly affected by transportation noise. (See additional discussion in *Transportation Noise Sources* below).

In the county's rural areas, land uses consist primarily of agriculture, rural recreation, and low-density residential. While rural areas generally have low ambient noise, agricultural operations in these areas can produce high noise levels or nuisance noise during planting and harvest due to the operation of machinery, equipment, and increased vehicle trips. Typical noise levels generated by agricultural activities in the county can range from 74 dBA to 116 dBA; however, ambient noise levels are generally much lower except in the vicinity of active agricultural machinery use and roadways. Higher ambient noise levels in rural areas are typically associated with specific roads with higher levels of noise generation, including U.S. Highway 101 and State Routes (SRs) 1, 154, 135, and 246 (County of Santa Barbara 2009).

Transportation Noise Sources

In most areas of the county, transportation facilities are the most significance noise source (County of Santa Barbara 2009). Major transportation noise sources in the county include: 1) major roadways (i.e., highways and major local roadways); 2) the Union Pacific Railroad (UPRR); and 3) airports.

Major Roadway Noise

Highways and some major local roadways (e.g., Patterson Avenue and Calle Real in the South Coast) in the county carry traffic volumes that can produce L_{dn} levels that exceed county thresholds for residential land uses. For example, U.S. Highway 101 carried a maximum estimated 135,000 Annual Average Daily Trips (ADT) in 2021 at its junction with SR 154 (Caltrans 2021). These highway traffic volumes are estimated to generate up to 70 dB L_{dn} within 50 feet from cars and could increase up to 83 dB L_{dn} with the addition of estimated heavy truck traffic within 50 feet on this segment (estimated by Caltrans at 6 percent of total Annual ADT). On highway segments that carry substantially fewer ADT, noise levels can also exceed local ambient noise standards for sensitive land uses, such as on U.S. Highway 101 or SR 135 in Orcutt where a substantial proportion (14 percent and 20 percent, respectively) of truck traffic can increase average ambient noise levels up to 80 dB L_{dn} within 50 feet of the travel corridor. Calle Real, near El Sueno Road in the Eastern Goleta Valley of the South Coast, is a local road that carries 7,000 ADT and is estimated to generate a combined day-night average of 83 dB L_{dn} when combined with other transportation noise, including UPRR and U.S. Highway 101 running parallel to Calle Real (Appendix E).

Based on existing Annual ADT on key highways and local roadways and the estimated train operations on UPRR, existing transportation noise levels range from 52 dB L_{dn} on local residential streets, such as San Marcos Road within the San Marcos Agricultural Area in Eastern Goleta Valley, to 57 dB L_{dn} on primary local roads such as Hollister Avenue in Eastern Goleta Valley or Clark Avenue in Orcutt, up to 83 dB L_{dn} or more on high-volume highways, such as U.S. Highway 101 at its junction with SR 154 (Table 3.11-6; Appendix E). Unattenuated, receptors within 50 feet of these roadways would be exposed to these noise levels.

Along higher noise segments of highways and/or railways, it is common to employ attenuation strategies, such as sound walls and setbacks for sensitive land uses in a combination that effectively reduces roadway noise to acceptable levels. Topography and intervening structures can also reduce the direct effects of roadway noise on sensitive adjacent land uses. For interior spaces, buildings can use a variety of design approaches to block exterior noise sources, such as noise-dampening insulation and windows and building orientation to minimize occupant exposure. These ground-based noise attenuation strategies must be considered based on the specific conditions along a travel corridor and the proposed land use and design approach for the affected adjacent areas.

Table 3.11-6. Estimated Existing Transportation Noise Levels on Select Highways and Local Roads

Roadway Segment[1]	Type[3] [4]	L_{dn} Noise Levels at 50 feet (dB)[2]
U.S. Highway 101 at Junction SR 154	Highway	83
U.S. Highway 101 at Turnpike Road	Highway	83
U.S. Highway 101 at Junction SR 217 South	Highway	82
U.S. Highway 101 at Storke Road	Highway	80
Patterson Ave – Hollister Ave to U.S. Highway 101	Local	72
Hollister Ave – Walnut Lane to San Marcos Road	Local	57
San Marcos Road – Hollister Ave to San Simeon	Local	52
Turnpike Road – Hollister Ave to U.S. Highway 101	Local	59
Calle Real – El Sueno to Turnpike Road*	Local	83
Cathedral Oaks at SR 154	Local	55
Hollister Ave – Turnpike Road to Upper State Street	Local	58
SR 192 – Linden Ave	Highway	66
U.S. Highway 101 at Santa Monica Road	Highway	80
U.S. Highway 101 at West Clark Avenue	Highway	80
SR 135 at East Clark Avenue	Highway	80
Clark Ave – Bradley Road to Stillwell Road	Local	57

Notes:
[1] Roadway operations based on Annual ADT and truck traffic for 2021 recorded by the Caltrans Traffic Census and estimated annual UPRR freight and passenger train operations.
[2] L_{dn} levels estimated using U.S. HUD Exchange Day-Night Noise Calculator at 50 feet from the center line of the transportation corridor.
[3] Highways include noise from heavy trucks and cars based on Caltrans fleet mix information; Local roads include noise from only cars.
[4] UPRR operational noise estimated levels are combined with noise from roadway segments in Eastern Goleta Valley.
* Calle Real is a frontage road along U.S. Highway 101 and UPRR. Local roads, highways, and UPRR noise are included for this location.
Source: Appendix E.

Railroad Noise

Two railroad companies, the Southern Pacific Railroad and the Santa Maria Valley Railroad, operate in Santa Barbara County along the UPRR. The Southern Pacific generally follows the coast through the county with two branches off the main line. One branch, at Surf, serves the City of Lompoc and the diatomaceous earth mining operation south of the city. A second branch serves Vandenberg Space Force Base (VSFB). Two passenger trains and an average of 12 freight trains traverse the Southern Pacific main line daily. The Santa Maria Valley Railroad connects with the Southern Pacific at Guadalupe and serves the City of Santa Maria. A short spur connects with Santa Maria Airport to the south (County of Santa Barbara 2009).

The UPRR, which provides Amtrak passenger service and regional freight train service, contributes to community ambient noise levels adjacent to the travel corridor. With approximately 35 passenger trains and up to 43 freight trains passing through the corridor per week, UPRR can generate up to 71 dB L_{dn} within 50 feet. Further, some segments of UPRR run contiguous with U.S. Highway 101 and, as a result, these transportation noise sources combine to amplify the average sound levels in the vicinity. For example, through Eastern Goleta Valley, UPRR runs immediately adjacent to U.S.

Highway 101. When combined, noise levels can reach an estimated maximum of 84 dB L_{dn} within 50 feet of the corridor (Appendix E).

Airport Noise

Airports generate high noise levels from daily operations, and jet traffic generates the loudest noise levels. According to the FAA, numerous factors determine how much aircraft noise is experienced on the ground, including the model aircraft and what type of engines are being used for each flight, whether the aircraft is taking off or landing, the flight path of the flights going overhead, how quickly each plane ascends and descends, and whether the aircraft is operating at full power or partial power. Noise experienced on the ground also depends on flight schedules, which can vary depending on the time of day, season of the year, or other operational factors. Weather also plays a large role, since sound attenuates (dissipates) differently depending on weather conditions (e.g., wind speed and direction, temperature) (FAA 2023).





Airports can generate high noise levels within approach zones that result in noise complaints from residents, including in Eastern Goleta Valley where flights to Santa Barbara Airport are encouraged to avoid neighborhoods around More Mesa (pictured) by following a path of open space and agricultural land provided by the South Patterson Agricultural Area. Source: Noozhawk; Santa Barbara Airport

Similar to the County's noise thresholds, the FAA has adopted 65 dB L_{dn} as the threshold of significant noise exposure, below which residential land uses are compatible. Airport noise compatibility maps depict the contours for 65, 70, and 75 dB L_{dn} noise levels geographically to inform land use planning and decision-making in areas around airports. The purpose of noise compatibility policies is to avoid the establishment of new incompatible land uses and exposure of the users to levels of aircraft noise that can disrupt the activities involved (FAA 2023).

Public and private airports in Santa Barbara County include the following:

- Santa Barbara Airport, located adjacent to Eastern Goleta Valley and the City of Goleta on the South Coast
- Santa Maria Airport, located adjacent to Orcutt in the Santa Maria Valley
- Lompoc Airport, located north of the City of Lompoc adjacent to the Santa Ynez River
- Santa Ynez Airport, located immediately east of Santa Ynez and SR 246 in the Santa Ynez Valley
- New Cuyama Airport, located immediately south of New Cuyama in the Cuyama Valley

The county also has one military base, VSFB, which is used exclusively for military operations. VSFB is in the Lompoc Valley midway between the City of Lompoc and the City of Santa Maria. There are no other private airstrips located within the Project area that are proximate to sites included as part of the Housing Element Update sites inventory.

The Airport Land Use Commission (ALUC) for the Santa Barbara County Association of Governments (SBCAG) is responsible for protecting public health, safety, and welfare by ensuring that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations. SBCAG's Airport Land Use Compatibility Plans (ALUCPs) serve as a tool for the ALUC to review land use plans and development proposals within Airport Influence Areas (AIAs).[2] As discussed further in Section 3.10, *Land Use and Planning*, these plans also provide land use compatibility policies and criteria applicable to local jurisdictions in their preparation or amendments of General Plans/Comprehensive Plans. The ALUCPs identify airport noise levels and provide guidance relative to noise constraints for adjacent land uses. The ALUCPs adopt a baseline noise threshold to compel evaluation of land use compatibility with airport noise, as well as acceptable noise levels for residential uses in the Urban and Rural Areas (Table 3.11-7). Residents and occupants of land uses in rural settings oftentimes are more sensitive to noise disturbances than their urban counterparts because the ambient noise levels are lower in rural settings. Based on noise compatibility maps in the ALUCPs, there are some existing residential uses within the applicable noise threshold contours of any public or private airport in the county.

Table 3.11-7. Maximum Airport-Related Noise Levels for Residential Development

Airport	Type	Noise Threshold (CNEL) for Land Use Compatibility Evaluation	Noise Threshold (CNEL) for Residential Uses	Existing Residential Uses within Noise Threshold?	Number of Existing Residential Parcels within Noise Threshold[1]
Santa Barbara Airport	Urban	55 dB	65 dB	No	61
Santa Maria Airport	Urban	55 dB	65 dB	No	84
Lompoc Airport	Rural	55 dB	60 dB	No	2
Santa Ynez Airport	Rural	55 dB	60 dB	No	0
New Cuyama Airport[2]	Rural	N/A	N/A	N/A	N/A

Notes:
[1] Only parcels in the unincorporated county were considered.
[2] The Santa Barbara County ALUCPs do not address New Cuyama Airport; noise compatibility policies were not developed for the New Cuyama Airport because underlying data has never been prepared for the private airport in the past. Further, the Draft New Cuyama Airport ALUCP (2019) was not finalized along with the other ALUCPs. New Cuyama Airport reestablished operations in October 2022.
Source: SBCAG 2023.

[2] The Airport Influence Area (AIA) is a composite of the areas surrounding the airport that are affected by noise, height, and safety considerations.

While some existing residential areas lie within noise compatibility threshold contours in the county, airports with high flight volumes overlying residential lands can still generate noise that can be a nuisance for residents. Airports located in the Rural Area, on the outskirts of urban communities, and/or that provide service primarily for smaller planes without jet engines typically do not generate noise levels that lead to noise nuisances and complaints from the community. In the county, the Santa Ynez Airport, Lompoc Airport, and New Cuyama Airport are rural airports that are not commonly a source of noise nuisance complaints due to fewer flights and smaller planes. In contrast, airports within urban communities that provide jet services often produce noise at a loudness, frequency, and duration that can cause community-level noise nuisances and substantial levels of complaints. In the county, Santa Maria Airport and Santa Barbara Airport are both urban airports with operations audible to surrounding rural and urban neighborhoods. These airports have a history of noise complaints that influence airport operations. For example, the Santa Barbara Airport logged 564 noise complaints through its official system in May 2021, which is a level not seen since before the COVID-19 pandemic. Based on airport information, 38 percent of the letters involved complaints originating in Hope Ranch, with 31 percent from the More Mesa area and 18.3 percent from neighborhoods south of Hollister Avenue (City of Santa Barbara 2021). The City of Santa Maria also has an official online system for receiving noise complaints from the public (City of Santa Maria 2023).

Given a history of noise complaints in the Goleta area from airport operations, Santa Barbara Airport has two Voluntary Noise Abatement Approach procedures in the airport:

1. **Aircraft Approach to Runway 25**. This voluntary noise abatement approach requests that high-performance aircraft approach the Santa Barbara Airport over the ocean and make a modified base-to-final turn at approximately 2.5 miles east. Aircraft are asked to overfly the More Mesa open space while turning from the 'base leg' to the "final approach leg" of their descent over the South Patterson Agricultural Area to Runway 25. It is important to note that the industry standard for a safe approach to landing is a 3-5 mile straight-in approach according to the FAA, which in the Santa Barbara/Goleta area would involve overflight over Hope Ranch and other communities. (Section 3.8, *Hazards and Hazardous Materials* provides an analysis of airport safety issues and Section 3.10, *Land Use and Planning* provides a discussion of airport land use compatibility analysis.)
2. **Aircraft Approach for Runways 15R & 15L**. This voluntary noise abatement approach requests that aircraft (typically general aviation, smaller aircraft) overfly U.S. Highway 101 while inbound/outbound to/from Santa Barbara Airport.

Santa Barbara Airport noise abatement procedures are voluntary, as required by the FAA. It is important to note that these flight paths can only be used when it is safe to conduct, as determined by the pilot in command (PIC) of each inbound aircraft. A pilot may choose to not accept the voluntary approach due to several factors that deem the voluntary approach unsafe. These include weather conditions, high aircraft altitude, aircraft speed, position when cleared by air traffic to turn inbound, pilot training or proficiency on the approach, cabin readiness, emergencies of inbound aircraft, or air traffic separation needed (City of Santa Barbara 2021).

3.11.4 Regulatory Setting

State, and local regulations have been enacted to address noise in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the proposed Project and its associated impacts.

No federal noise requirements or regulations apply to local actions of the County. However, federal regulations influence the audible landscape where federal funding is involved. The FHWA requires abatement of highway traffic noise for highway projects through rules in 23 Code of Federal Regulations (CFR) Part 772. Further, the FTA and Federal Railroad Administration (FRA) each recommend thorough noise and vibration assessments through comprehensive guidelines for any mass transit or high-speed railroad projects that would pass by residential areas. For housing constructed with assistance from the U.S. HUD, minimum noise insulation standards must be achieved (24 CFR Part 51, Subpart B).

3.11.4.1 Federal

Noise Control Act

The Noise Control Act of 1972 recognized the role of the federal government in dealing with major commercial noise sources that require uniform treatment. Since Congress has the authority to regulate interstate and foreign commerce, regulation of noise generated by such commerce also falls under congressional authority. The federal government specifically preempts local control of noise from aircraft, railroads, and interstate highways. The USEPA has identified acceptable noise levels for various land uses to protect the public, with an adequate margin of safety, and to establish noise emissions standards for interstate commerce. The U.S. HUD standards define L_{dn} at or below 65 dB for outdoors as acceptable for residential areas.

Airport Noise and Capacity Act

The FAA implemented the Airport Noise and Capacity Act (ANCA) in 1990. ANCA limited the ability of airport sponsors to propose and implement new restrictions and/or fines on aircraft operating into or out of airports after 1990. Access restrictions have the potential to violate the federal obligation to make the airport available for public use on reasonable terms and without unjust discrimination as required by Grant Assurance 22, Economic Non-discrimination.

FAA Regulations – 14 CFR Part 150

14 CFR Part 150, Airport Noise Compatibility Planning, is the primary federal regulation guiding and controlling planning for aviation noise compatibility on and around airports. Part 150 establishes procedures, standards, and methodologies to be used by airport operators for the preparation of Airport Noise Exposure Maps (NEMs) and Airport Noise Compatibility Programs (NCPs). The Part 150 process is a balanced approach for mitigating the noise impacts of airports upon their neighbors/community while protecting or increasing both airport access and capacity, as well as maintaining the efficiency of the national aviation system. The procedures contained in Part 150 are voluntary and airport operators are not required to participate.

U.S. HUD Regulations – 24 CFR Part 51, Subpart B

U.S. HUD's noise standards for federally supported housing and community development projects may be found in 24 CFR Part 51, Subpart B, Noise Abatement and Control. For proposed new construction in high-noise areas, the project must incorporate noise mitigation features. Consideration of noise applies to the acquisition of undeveloped land and existing development as well. All sites where environmental or community noise exposure exceeds the day-night average sound level (DNL or L_{dn}) of 65 dB are considered noise-impacted areas. For new construction that is

proposed in high noise areas, grantees shall incorporate noise attenuation features to the extent required by HUD environmental criteria and standards contained in Subpart B (Noise Abatement and Control) of 24 CFR Part 51. The interior standard is 45dB.

The "Normally Unacceptable" noise zone includes community noise levels from above 65 dB to 75 dB. Approvals in this noise zone require a minimum of 5 dB of additional sound attenuation for buildings having noise-sensitive uses if the day-night average sound level is greater than 65 dB but does not exceed 70 dB, or a minimum of 10 dB of additional sound attenuation if the day-night average sound level is greater than 70 dB but does not exceed 75 dB. Locations with day-night average noise levels above 75 dB have “Unacceptable” noise exposure. For new construction, noise attenuation measures in these locations require review and approval. In "Unacceptable" noise zones, the U.S. HUD strongly encourages the conversion of noise-exposed sites to land uses compatible with high noise levels. This noise policy is implemented subject to U.S. HUD’s Noise Assessment Guidelines, which provide a methodology and tools developed by U.S. HUD to assess transportation noise impacts for housing projects.

3.11.4.2 State

California Noise Control Act

The California Noise Control Act states that excessive noise is a serious hazard to public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also recognizes that continuous and increasing bombardment of noise exists in urban, suburban, and rural areas. This act declares that the State of California has the responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise.

California Code of Regulations Section 65302(f)

California Code of Regulations, Section 65302(f), requires local land use planning jurisdictions to prepare a general plan. The noise element is a mandatory component of the general plan. It may include general community noise guidelines developed by the California Department of Health Services and specific planning guidelines for noise/land use compatibility developed by the local jurisdiction. The state guidelines also recommend that the local jurisdiction consider adopting a local noise control ordinance.

State Department of Health Services

The California Department of Health Services developed guidelines for community noise acceptability for use by local agencies. Selected relevant levels are as follows (L_{dn} may be considered nearly equal to CNEL):

- CNEL below 60 dBA – normally acceptable for low-density residential use
- CNEL of 55 dBA to 70 dBA – conditionally acceptable for low-density residential use
- CNEL below 65 dBA – normally acceptable for high-density residential use
- CNEL of 60 to 70 dBA – conditionally acceptable for high-density residential use, transient lodging, churches, and educational and medical facilities
- CNEL below 70 dBA – normally acceptable for playgrounds and neighborhood parks

"Normally acceptable" is defined as satisfactory for the specified land use, assuming that normal conventional construction is used in buildings. "Conditionally acceptable" may require some additional noise attenuation or special study. Under most of these land use categories, overlapping ranges of acceptability and conditionally acceptable are presented, leaving some ambiguity in areas where noise levels fall within the overlapping range.

California Building Code / Insulation Standards

California Code of Regulations, Title 24 includes Sound Transmission Control requirements that establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwelling units other than detached single-family units. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new dwellings. Where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL, the standards require an acoustical analysis demonstrating how dwelling units have been designed to meet the interior standard. Dwelling units are to be designed so that interior noise levels would meet this standard for at least 10 years from the time of a building permit application.

California Department of Transportation

The Caltrans Transportation and Construction Vibration Guidance Manual provides guidance and procedures that "…should be treated as screening tools for assessing the potential for adverse vibration effects related to human perception, structural damage, and equipment. This document is not an official policy, standard, specification, or regulation, and should not be used as such."

As discussed above, the Caltrans vibration criteria for assessing structural damage and human perception are shown in Table 3.11-4 and Table 3.11-5 above.

California Air Resources Board Anti-Idling Measure

In 2004, the California Air Resource Board adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling (California Code of Regulations, Title 13, Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at a time at a location, thereby minimizing vehicle noise from idling vehicles.

3.11.4.3 Local

Santa Barbara County Comprehensive Plan Noise Element and Environmental Thresholds

The County Comprehensive Plan is a "comprehensive, long-term general plan" that governs the future growth and development of the unincorporated county. The County Comprehensive Plan contains land use goals, policies, and implementation measures within each of its elements. The Noise Element identifies and appraises noise problems within the community and influences the distribution of land uses based on the noise level associated with those land uses.

Additionally, development located within the jurisdiction of each of the County's community plans would be subject to the noise goals and policies of the respective community plan, the goals and policies of which implement the goals and policies of the Noise Element.

County Zoning Ordinances

The County's Land Use and Development Code (LUDC), Montecito Land Use and Development Code (MLUDC), and Article II – Coastal Zoning Ordinance (CZO) of the Santa Barbara County Code (Chapter 35), carry out the policies of the Comprehensive Plan by classifying and regulating the uses of land and structures within the inland and coastal areas of the county, consistent with the Comprehensive Plan. These County codes are adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the county. The LUDC, MLUDC, and CZO establish various standards for regulating noise or noise exposure which are applicable to development within specific zones or zones located within overlay areas.

County of Santa Barbara Nighttime Noise Ordinance

Under Chapter 40 of the County Code, loud and unreasonable amplified noise is prohibited in the unincorporated area of the county during any of the following periods: 1) The night and following morning of any Sunday, Monday, Tuesday, Wednesday, or Thursday between the hours of 10:00 p.m. and 7:00 a.m. the following morning; or, 2) the morning hours after midnight of any Friday or Saturday, between midnight and 7:00 a.m. the following morning.

County of Santa Barbara Grading Code

Chapter 14 of the County Code is the Santa Barbara County Grading Code (Ord. No. 4766, 11-9-2010). The regulations, conditions, and provisions of this chapter constitute minimum standards and procedures necessary to protect and preserve life, limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, location, and maintenance of grading, drainage, erosion, and sediment control when required by these regulations within the County. The regulation of construction activities under this chapter also regulates construction-related noise. Though Chapter 14 does not specify noise level limits, Section 14-22 restricts grading work (except emergency operations) to take place between the hours of 7:00 a.m. and 7:00 p.m., unless the County finds that such operations are unlikely to cause significant public nuisance or must, by necessity, be accomplished at other times and authorizes such night operations in writing.

Airport Land Use Compatibility Plans

Airport Land Use Compatibility Plans provide land use compatibility policies and ensure that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations (SBCAG 2018). The County's ALUCPs address areas within the AIAs for five airports in Santa Barbara County: Santa Barbara Airport, Santa Maria Airport, Lompoc Municipal Airport, VSFB, and IZA. (See Figure 3.8-2; Section 3.8, *Hazards and Hazardous Materials*.)

Noise compatibility around airports follows state regulations. In Section 5006, the regulations state that "[t]he level of noise acceptable to a reasonable person residing in the vicinity of an airport is established as a community noise equivalent level (CNEL) value of 65 dB for purposes of these regulations. This criterion level has been chosen for reasonable persons residing in urban residential areas where houses are of typical California construction and may have windows partially open. It has been selected with reference to speech, sleep, and community reaction."

3.11.5 Environmental Impact Analysis

This section discusses the potential noise impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.11.5.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program Environmental Impact Report (EIR), implementation of the proposed Project may have a significant adverse impact relating to noise if it would:

a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

b. Generate excessive groundborne vibration or groundborne noise levels;

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, the project would expose people residing or working in the project area to excessive noise levels.

County of Santa Barbara Environmental Thresholds and Guidelines Manual

The CEQA Guidelines (Appendix G) criteria are expanded and made more specific in the County's noise thresholds contained in the County's *Environmental Thresholds and Guidance Manual* (2021). The following noise thresholds will be applied in the impact analysis to determine the significance of noise impacts for the proposed Project (L_{dn} may be considered nearly equal to CNEL):

a. If existing exterior noise levels, including in outdoor living areas, experienced by sensitive receptors are below 65 dBA CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors to exceed 65 dBA CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

b. If existing exterior noise levels, including in outdoor living areas, experienced by sensitive receptors exceed 65 dBA CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors to increase by 3 dBA CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

c. If existing noise levels experienced by sensitive receptors in interior living areas are below 45 dBA CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors in interior living areas to exceed 45 dBA CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

d. If existing noise levels experienced by sensitive receptors in interior living areas exceed 45 dBA CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors in interior living areas to increase by 3 dBA CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

e. Noise from grading and construction activity proposed within 1,600 feet of sensitive receptors, including schools, residential development, commercial lodging facilities, hospitals, or health care facilities, would generally result in a potentially significant impact. According to USEPA guidelines, average construction noise is 95 dBA[3] at a 50-foot distance from the source. A 6 dB drop typically occurs with a doubling of the distance from the source. Therefore, locations within 1,600 feet of the construction site would be affected by noise levels over 65 dBA.[5] To mitigate this impact, construction within 1,600 feet of sensitive receptors shall be limited to weekdays between the hours of 8 a.m. to 5 p.m. only. Noise attenuation barriers and muffling of grading equipment may also be required. Construction equipment generating noise levels above 95 dBA may require additional mitigation.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. As a result, the impact analysis provided below does not evaluate individual noise and/or vibration hazards at a project- or site-specific level. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for the lower- and moderate-income affordability levels. The programmatic analysis provided by this Program EIR addresses the potential for future developments enabled under the Housing Element Update to significantly increase noise levels within the county or expose residents to unacceptable noise levels during construction or operation.

The State of California and the County have established criteria for noise exposure, which require that interior noise levels within residential dwelling units fall below 45 dBA, and exterior living areas (e.g., yards, balconies, and patios) be located and/or designed in such a manner to keep noise exposure levels below 65 dBA. Therefore, development near significant noise sources would require an acoustical analysis and specific design features to minimize potentially significant noise impacts (County of Santa Barbara 2015).

As a programmatic analysis for a long-range countywide plan, site-specific quantitative noise measurements of ambient noise levels are not available. Rather, the potential impacts relative to the existing noise environment are assessed qualitatively and/or estimated based on known approximate noise levels of future project activities, such as construction equipment or increased transportation noise. Noise impacts would be unique to individual housing developments on specific sites. The sites inventory provided as part of the Housing Element Update indicates where housing developments may occur under the proposed Project and informs this environmental impact analysis. The noise impact assessment generally compares the location of potential residential and mixed use developments to the location of known high noise levels. Wherever possible, illustrative examples are

[3] These noise levels represent L_{eq} measurements, not CNEL or L_{dn} day-night averages.

provided to describe particular areas of the county (e.g., within transportation noise corridors) where the implementation of the Housing Element Update would expose sensitive receptors to exterior noise levels above 65 dB L_{dn}. Geographic Information System (GIS) analysis is also employed to estimate the acreage associated with future housing development that may be affected by high airport noise levels between 60 to 65 dB L_{dn}.

Construction noise would occur during each phase of construction, including demolition, grading/excavation, and building construction. However, the specific construction details (e.g., scheduling/phasing, equipment, building construction size, grading, etc.) for future projects under the Housing Element Update are unknown at this time and would vary annually. Therefore, it is difficult to quantify the construction-related noise levels that may potentially occur. As such, the analysis of construction-related noise impacts is qualitative, discussing the potential range of construction-related impacts that could potentially occur from individual development projects and assessing the potential for sensitive receptors to lie within 1,600 feet of construction noise generators, per County thresholds.

Further, permanent increases in roadway noise would occur from operations of the proposed Project, which would potentially affect sensitive receptors. As such, the analysis includes a programmatic assessment of transportation noise, including highways, roadways, and railroad operations. For this Program EIR, transportation noise modeling and mapping for high-volume travel corridors is not feasible as roadway operations (i.e., level of service) data is not available for the proposed Project. (See Section 3.12, *Transportation* for more information regarding potential impacts to transportation.) Instead, the analysis employs available data and electronic tools to quantify the potential for multiple housing projects to collectively cause noise impacts from concurrent construction and operation over the 8-year life of the Housing Element Update. As potential housing sites lie primarily within the Urban Area and are often clustered together, the noise impacts may be more pronounced on roadways serving the new development than if each housing site were considered individually. For this reason, the analysis performs programmatic calculations to estimate the potential increase in transportation noise generated when housing sites are combined in specific areas of the county (e.g., South Patterson Agricultural Area in Eastern Goleta Valley or Clark Avenue in Orcutt).

To estimate potential increases in ambient noise from transportation sources, this analysis uses available Annual ADT data for highways and local roadways and railroad operations (i.e., UPRR) in areas of the county that may be affected by new housing based on the sites inventory prepared for the Housing Element Update. The U.S. HUD's Day-Night Noise Level (DNL) Estimator Tool, which is an electronic assessment tool that calculates the L_{dn} from roadway and railway traffic for environmental review of housing development, was used to convert the existing (2021) annual ADT from the Caltrans Traffic Census and local traffic studies plus estimated annual UPRR freight and passenger train operations into L_{dn} levels experienced within 50 feet of the centerline of the transportation corridor. Where these two transportation noise sources combine to increase L_{dn}, the calculation considered both sources. Once baseline noise levels were calculated, the DNL Tool was used again to estimate the potential future noise level with the estimated Annual ADT from the potential development of housing sites adjacent to the roadway. The estimated increase in Annual ADT from selected sites is based on the potential maximum buildout of each site under proposed zoning, as described in Chapter 3, *Environmental Impact Analysis*. The difference calculated between baseline noise conditions and future potential noise conditions with Project-related Annual ADT is provided as a basis for impact analysis relative to the County's noise thresholds. The results of this programmatic transportation noise analysis represent a reasonable worst-case scenario for the impacts of additional Project-

related transportation noise on local roadways and highways but are not representative of all noise sources or of existing attenuation, which may reduce the noise exposure for receptors (i.e., sound walls, topography). (See Appendix E for the input, results, and methodologies/assumptions applied in this programmatic transportation noise analysis.)

Since no specific development proposals with associated detailed site or construction plans are proposed as part of the Housing Element Update, groundborne vibration levels that could be generated by construction equipment have also been qualitatively described and compared to applicable thresholds of significance. Groundborne vibration levels resulting from construction activities are estimated using the published data in the 2020 Caltrans *Transportation and Construction Vibration Guidance Manual*. Potential vibration levels are identified for on and offsite locations that are sensitive to vibration, including nearby residences and historic structures. The CEQA Guidelines and County thresholds also do not define the levels at which groundborne vibration or groundborne noise is considered "excessive." For this analysis, groundborne vibration impacts would be significant if the proposed Project exceeds the threshold of 0.1 in/sec within 25 feet of any building. Per Caltrans, this threshold corresponds to the level at which vibration can cause a "strongly perceptible" degree of human annoyance and has the potential to cause structural damage in fragile buildings as shown in Table 3.11-3 and Table 3.11-5.

Key resources or data used in the preparation of this section include the Santa Barbara County Comprehensive Plan Noise Element, the Noise Ordinance of the County Code, USEPA Noise Effects Handbook, U.S. HUD's Noise Assessment Guidelines, Caltrans Transportation and Construction Vibration Guidance Manual, and various noise publications such as the FAA Part 150 guidance. The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This programmatic analysis is supported by the review of existing plans, including SBCAG's ALUCPs for all airports in the county. Additionally, this section integrates relevant information from the 2021 Connected 2050: Regional Transportation Plan and Sustainable Communities Strategy EIR, the 2017 Cannabis Land Use Ordinance and Licensing Program EIR, the 2016 Gaviota Coast Plan EIR, the 2015 Eastern Goleta Valley Community Plan EIR, the 1997 Orcutt Community Plan, and the Key Site 3 EIR.

3.11.5.2 Project Impacts

Table 3.11-8, below, provides a summary of the noise impacts related to the proposed Project. A detailed discussion of each impact follows.

Table 3.11-8. Summary of Noise Impacts

Noise Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact NOI-1. The proposed Project would generate temporary construction noise from both individual housing projects and the development of several adjacent housing projects.	Potentially significant	MM NOI-1 (Construction Hours) MM NOI-2 (Noise Study and Site-based Attenuation)	Significant but mitigable
Impact NOI-2. The proposed Project would permanently increase operational roadway noise levels, particularly on highways and primary roadways, and create permanent sources of noise from deliveries, trash hauling, parking, and mechanical equipment.	Potentially significant	MM NOI-2 (Noise Study and Site-based Attenuation) MM T-1 (Site-based TDM)	Significant but mitigable
Impact NOI-3. The proposed Project would not potentially expose adjacent sensitive receptors or structures to excessive groundborne vibration or groundborne noise levels.	Insignificant	No Mitigation Required	Insignificant
Impact NOI-4. The proposed Project would potentially expose new residents or workers to excessive airport noise.	Potentially significant	MM NOI-2 (Noise Study and Site-based Attenuation)	Significant but mitigable
Cumulative Impacts	Potentially significant	MM NOI-1 (Construction Hours) MM NOI-2 (Noise Study and Site-based Attenuation)	Significant but mitigable

Impact NOI-1. The proposed Project would generate temporary construction noise from both individual housing projects and the development of several adjacent housing projects.

As described in Chapter 2, *Project Description*, the proposed Project would enable future residential and mixed use development to accommodate the RHNA plus a 15 percent buffer for the lower- and moderate-income affordability levels. Based on the sites inventory prepared for the Housing Element Update, new housing projects would primarily occur within the existing Urban Area on infill sites surrounded by existing development, including sensitive receptors, such as residences, schools, and health care facilities. Further, in some instances, potential housing sites are near or adjacent to one another and could be developed concurrently over the 8-year life of the proposed Project.

Temporary noise would be generated from construction activities, including the modification or potential demolition of existing uses, construction of new residential or mixed use developments, and other similar types of construction related to housing development. This new residential development would involve construction activities that would generate noise, including onsite noise from heavy

construction equipment, generators, power tools, and other sources of noise for various types of construction activities, as well as off-site noise from heavy haul trucks and construction worker commutes. This effect is likely to be greatest in Eastern Goleta Valley along Hollister Avenue and Calle Real and in Orcutt along Clark Avenue and Union Valley Parkway where a significant portion of potential rezone sites are located. Under the proposed Project, it is anticipated that through 2031, existing communities would experience the demolition of existing uses and construction of new multifamily buildings of four or more stories, including some potential for subterranean parking, new local streets, infrastructure improvements (i.e., replacement/installation of new utility lines), and other similar types of construction-related to urban land uses. Though precise locations would vary over time, construction activity at one or more locations could potentially occur continuously through the year 2031 and beyond. Further, the potential exists for large construction projects located in the same area or on the same block to overlap, expanding the range of noise sources and compounding peak noise levels generated.

Construction noise levels differ depending on the equipment being used. Using data published by the DOT, peak construction equipment noise can range from 68 dBA L_{eq} (pumps, vibrators) up to 101 dBA L_{eq} (pile driver) at 50 feet from the source (Table 3.11-9). While the use of pile drivers for new housing projects enabled under the Housing Element Update would likely be rarely or not needed, other higher peak noise-generating equipment, such as heavy haul trucks, jackhammers, backhoes, tractors, and scrapers/graders generating maximum noise levels of 93 dBA L_{eq} to 98 dBA L_{eq}, would be commonly used through demolition (if needed), site preparation, grading, and foundation phases for each project. Most potential housing sites are currently vacant, so it is expected that most housing projects would require heavy equipment for site development.

Table 3.11-9. Noise Ranges of Typical Construction Equipment

Construction Equipment	Noise Levels in dBA L_{eq} at 50 Feet
Pile Driver	95-101
Auger Drill Rig	80-85
Front Loader	73–86
Trucks	82–95
Cranes (moveable)	75–88
Cranes (derrick)	86–89
Vibrator	68–82
Saws	72–82
Pneumatic Impact Equipment	83–88
Jackhammers	81–98
Pumps	68–72
Generators	71–83
Compressors	75–87
Concrete Mixers	75–88
Concrete Pumps	81–85
Backhoe	73–95
Tractor	77–98
Scraper/Grader	80–93
Paver	85–88

Note: Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.

Source: FHWA 2006.

Further, the USEPA has compiled data regarding the noise-generating characteristics of typical construction activities and phases of development (Table 3.11-10). Site excavation and grading present some of the loudest construction noise, as well as building finishing, which can generate up to 86 dBA L_{eq} at 50 feet away with mufflers on the equipment. As described in Section 3.11.2, *Fundamentals of Sound and Noise,* noise levels generated by specific construction equipment or collectively during different construction phases would diminish rapidly with distance from the construction site, at a rate of approximately 6 dBA per doubling of distance as equipment is generally stationary or confined to specific areas during construction. For example, a noise level of 86 dBA measured at 50 feet from the noise source to the receptor would reduce to 80 dBA at 100 feet from the source to the receptor and reduce by another 6 dBA to 74 dBA at 200 feet from the source to the receptor.

Table 3.11-10 Typical Noise Levels by Construction Phase and Activities

Construction Phase	Noise Levels in dBA Leq at 20 Feet	Noise Levels in dBA Leq at 50 Feet with Mufflers	Noise Levels in dBA Leq at 100 Feet with Mufflers
Ground Clearing	90	82	76
Excavation, Grading	94	86	80
Foundations	85	77	71
Structural	91	83	77
Finishing	94	86	80

Source: USEPA 1971.

Potential construction-related noise impacts on sensitive uses would be dependent on the relative distance of the sensitive use from construction activities. Where construction activities are located within 20 feet of a sensitive receptor, maximum noise levels could reach as high as 94 dBA at the exterior of adjacent sensitive receptors during the grading and finishing construction phases of potential future projects (Table 3.11-10). Considering the potential location of new housing projects enabled under the Housing Element Update, construction activities could result in short-term noise levels exceeding 65 dBA L_{eq} impacts that could affect noise-sensitive receptors within 1,600 feet, per County thresholds. For example, in Eastern Goleta Valley, construction activities in the San Marcos Agricultural Area (Rezone Site Nos. 8, 9, 10, and 17) could generate noise that would adversely affect the adjacent residential neighborhoods to the west and south and El Camino Elementary School to the north, or construction in the South Patterson Agricultural Area (Rezone Site Nos. 1, 2, 3, 4, 5, 6, and 7) could generate noise that would adversely affect the adjacent residential neighborhoods to the east or healthcare facilities associated with the Goleta Valley Cottage Hospital to the north. Offsite, heavy haul truck trips along haul routes could generate noise up to 82-95 dBA L_{eq} at 50 feet (Table 3-11-10). Further, construction near sensitive biological resources, such as riparian habitats and nesting bird habitats could generate noise that would significantly disturb sensitive species (Section 3.4, *Biological Resources.*)

Construction activities would occur incrementally throughout the proposed Project planning horizon, with associated construction noise temporarily and intermittently affecting localized areas through 2031. Construction activities at one or more locations within the county could potentially occur continuously through the year 2031. Further, the potential exists for large construction projects located in the same area or on the same block to have overlapping construction schedules. The logarithmic effect of these additions (Section 3.11.2, *Fundamentals of Sound and Noise*) is that two

individual projects with individual construction noise of up to 94 dBA, would result in a noise level of up to 97 dBA experienced at the sensitive receptor at a distance of 50 feet. As such, noise generated by construction activities occurring under the proposed Project would result in a temporary increase in ambient noise levels that exceed local noise thresholds and could result in temporary noise impacts affecting noise-sensitive receptors.

According to the County Code of Ordinances (Chapter 14 Grading Restrictions; Ord. No. 4766, 11-9-2010), grading work is prohibited between the hours of 7:00 p.m. and 7:00 a.m. (or as required within the land use permit) This regulation applies only to grading work and does not provide noise limitations for other construction phases. While some of the unincorporated communities have local policies adopted in community plans that limit construction noise (e.g., the Montecito Community Plan limits noise-generating construction activities to the hours between 7:00 a.m. to 4:30 p.m. Monday through Friday), areas that either do not have an applicable community plan or do not have local noise regulations beyond the countywide grading ordinance could potentially experience noise that exceeds the County's thresholds. Therefore, construction activities associated with Housing Element Update's implementation could result in noise levels above normal acceptable levels (e.g., greater than 65 dBA L_{eq} within 1,600 feet of the project) and would potentially create a substantial temporary or periodic increase in ambient noise levels. Construction noise impacts would be *potentially significant* and would require mitigation. **MM NOI-1 (Construction Hours)** would apply to all future development enabled under the Housing Element Update and **MM NOI-2 (Noise Study and Site-based Attenuation)** would apply to applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law to control construction noise generated from specific equipment and phases of development, as well as limit the duration and timing of construction to minimize adverse impacts on sensitive receptors. With these mitigations, the noise impacts from temporary construction would be substantially reduced and impacts would be *significant but mitigable*.

Impact NOI-2. The proposed Project would permanently increase operational roadway noise levels, particularly local roadways, and create permanent sources of noise from deliveries, trash hauling, parking, and mechanical equipment.

Ambient Noise from Transportation Sources

The proposed Project would lead to the development of substantial amounts of new housing primarily on vacant infill sites within urban communities, including Eastern Goleta Valley and Carpinteria on the South Coast, Mission Hills and Vandenberg Village in the Lompoc Valley, Orcutt in the Santa Maria Valley, Santa Ynez in the Santa Ynez Valley, and New Cuyama in the Cuyama Valley. Based on the Project's transportation study (Appendix E), total daily ADT countywide would increase by nearly 325,000 trips, a 41 percent increase from existing conditions. Based on the sites inventory prepared for the Housing Element Update, these new ADTs would not be evenly distributed; rather, clusters of development would occur within existing communities and would concentrate on existing roadways serving those communities. The increased transportation noise on these affected roadways could be substantial and exceed the County's noise threshold of 3 dBA, which is the increase in noise level that is generally perceptible to the human ear.

Under typical circumstances and where roadway conditions are constant (i.e., size, configuration, and speed limit), projected traffic volumes generally need to double over existing volumes for associated transportation noise levels to increase by approximately 3 dBA. This indicates that perceptible

changes to roadway noise levels would be most likely on roadways carrying relatively low traffic volumes that would experience a substantial increase in traffic associated with the proposed Project. In contrast, high-volume roadways, such as U.S. Highway 101, already generate substantial noise from Annual ADT, so the addition of Project-related ADT is incremental and not audibly perceptible.

To determine whether the proposed Project has the potential to increase transportation noise by 3 dB L_{dn} or more, a sample of roadways that would directly serve potential future housing sites enabled under the Housing Element Update were analyzed, including U.S. Highway 101 in Eastern Goleta Valley, Orcutt, and Carpinteria, SR 192 in Carpinteria, SR 135 in Orcutt, and local roads in Orcutt and Eastern Goleta Valley (i.e., Clark Avenue, Hollister Avenue, etc.). These selected noise study roadways were chosen for analysis because: 1) existing Annual ADT information was available;[4] and 2) the roadway would directly serve the traffic generated by housing sites identified in the Housing Element Update. Transportation noise was projected from baseline conditions by adding the estimated housing site Annual ADT to the existing roadway operations plus UPRR operations if applicable for the roadway segment (e.g., U.S. Highway 101 runs parallel to UPRR through Eastern Goleta Valley) and calculating the projected noise level using the U.S. HUD DNL Tool (Appendix E). The results of this analysis indicate the total potential change in transportation noise L_{dn} experienced as a result of the proposed Project's contribution to local traffic (Table 3.11-11).

As indicated in Table 3.11-11, residential and mixed use development enabled under the Housing Element Update would not likely result in substantial net increases in ambient noise levels on existing highways and primary arterial roadways that already carry higher volumes of Annual ADT; however, clusters of housing projects could generate new daily traffic that would substantially increase roadway noise on lower-traffic highways and roadways serving residential neighborhoods, particularly where the roadway noise is isolated from other transportation noise sources, such as UPRR. This effect is likely to be greatest in Eastern Goleta Valley and in Orcutt where most of the land use changes are anticipated to occur; however, this effect could occur in any community where substantial new housing development is proposed on roadways serving the proposed Project that currently carry lower volumes of Annual ADT. Because there is the potential for housing development to increase roadway noise by more than 3 dB L_{dn}, the proposed Project would have a *potentially significant* impact.

Further, as indicated in Table 3.11-11 and Appendix E, high-volume highways and roadways, such as U.S. Highway 101, SR 135, and Clark Avenue in Orcutt and U.S. Highway 101, Calle Real, and Patterson Avenue in Eastern Goleta Valley, can generate ambient roadway noise level that exceeds County noise thresholds for residential uses under existing conditions. For example, within 50 feet of the travel corridor, transportation noise from U.S. Highway 101 at its intersection with SR 154 and SR 217 in Eastern Goleta Valley can reach 83 dB L_{dn}. The movement of vehicles on a highway or trains on a track makes the source of the sound appear to emanate from a line (i.e., a "line" source). As described in Section 3.11.2, *Fundamentals of Sound and Noise*, the drop-off in sound level from a line source is typically 3 dBA per doubling of distance. This means this projected ambient average noise level reduces further from the travel corridor; for example, U.S. Highway 101 corridor noise could reduce to 80 dBA at 100 feet and 77 dBA at 200 feet. Additionally, noise attenuating features, such as sound walls, topography, and intervening structures could reduce the exposure of new housing to high transportation noise levels. However, as analyzed further in Section 3.10, *Land Use and Planning*, the proposed Project would foster the development of residential uses, which are sensitive noise

[4] Annual ADT data for selected roadway segments were obtained from 2021 Caltrans Traffic Census and local traffic studies for other EIRs, including the Orcutt Key Site 3 EIR and the Eastern Goleta Valley Community Plan EIR.

receptors, within existing noise environments along high-volume highways and roadways, including in areas without noise attenuating features. For example, Rezone Site No. 15 (Van Wingerden 1) would involve the development of new housing up to 30 units per acre within 500 feet of the U.S. Highway 101 corridor, which can produce between 68 dB L_{dn} and 71 dB L_{dn} at this distance from the travel corridor (Appendix E). While existing one- and two-story developments would block some direct effects of transportation noise on future housing development on this site, this segment of U.S. Highway 101 does not have a sound wall to attenuate roadway noise in this area of Carpinteria.

Table 3.11-11. Estimated Change in Transportation Noise Levels from Project Traffic on Selected Study Roadway Segments

Roadway Segment[1]	Type[3] [4]	Existing L_{dn} Noise Levels at 50 feet (dB)[2]	Projected L_{dn} Noise Levels at 50 feet (dB)	Total Projected Change in Transportation Noise L_{dn} (dB)
U.S. Highway 101 at Junction SR 154	Highway	83	83	0
U.S. Highway 101 at Turnpike Road	Highway	83	84	1
U.S. Highway 101 at Junction SR 217 South	Highway	82	83	1
U.S. Highway 101 at Storke Road	Highway	80	80	0
Patterson Ave – Hollister Ave to U.S. Highway 101	Local	72	72	0
Hollister Ave – Walnut Lane to San Marcos Road	Local	57	61	**4**
San Marcos Road – Hollister Ave to San Simeon	Local	52	55	**3**
Turnpike Road – Hollister Ave to U.S. Highway 101	Local	59	61	2
Calle Real – El Sueno to Turnpike Road*	Local	83	83	0
Cathedral Oaks at SR 154	Local	55	57	2
Hollister Ave – Turnpike Road to Upper State Street	Local	58	58	0
SR 192 – Linden Ave	Highway	66	68	2
U.S. Highway 101 at Santa Monica Road	Highway	80	80	0
U.S. Highway 101 at West Clark Avenue	Highway	80	82	2
SR 135 at East Clark Avenue	Highway	80	84	**4**
Clark Ave – Bradley Road to Stillwell Road	Local	57	59	2

Notes:

[1] Roadway operations based on Annual ADT and truck traffic for 2021 recorded by the Caltrans Traffic Census and estimated annual UPRR freight and passenger train operations.

[2] Ldn levels estimated using U.S. HUD Exchange Day-Night Noise Calculator: https://www.hudexchange.info/programs/environmental-review/dnl-calculator/ at 50 feet from the center line of the transportation corridor

[3] Highways include noise from heavy trucks and cars based on Caltrans fleet mix information; Local roads include noise from only cars.

[4] UPRR operational noise estimated levels are combined with noise from roadway segments in Eastern Goleta Valley

* Calle Real is a frontage road along U.S. Highway 101 and UPRR. Local roads, highways, and UPRR noise are included for this location.

Source: Appendix E.

MM NOI-2 (Noise Study and Site-based Attenuation) would require multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include a site-specific noise study that documents the existing noise conditions on site, recommends attenuation strategies and techniques to address sensitive receptors, and reduce exterior noise to at or below 65 dBA and interior noise to at or below 45 dBA . Further, **MM T-1 (Site-based TDM)** would reduce the proposed Project's Annual ADT to help ensure its contribution to ambient roadway noise is substantially reduced on local roadways. Together, these measures would substantially reduce operational transportation noise impacts below County thresholds and the impact would be *significant but mitigable*.

Ambient Noise from Stationary Operational Noise Sources

Operational sources of noise would be expected to increase incrementally over the planning horizon for the Housing Element Update as a result of new residential development in areas of the county that are currently vacant and/or agricultural. Besides the occasional delivery and trash hauling noise increase, residential land uses typically have low noise levels compared to other land uses. New residential development enabled under the Housing Element Update would generate an incremental increase in localized ambient noise due to the routine delivery of goods and weekly trash hauling, which are typical in the urban noise environment, including residential neighborhoods. Delivery and trashing hauling operations would generate noise from diesel engines and the backup beeper alarm that sounds when a truck is put in reverse, as required and regulated by the California Division of Occupational Safety and Health (Cal-OSHA). This noise generated by idling diesel engines would be temporary and intermittent (i.e., associated with weekly solid waste services), typically lasting no more than 5 minutes.[5] Backup beepers are required by Cal-OSHA to be at least 5 dBA above ambient noise levels. These devices are highly directional, and when in reverse the truck and beeper alarms would be directed towards the loading area and driveway/garage frontages of residential structures. Further, mechanical equipment, such as heating, ventilation, and air conditioning (HVAC) systems or ventilation fans, would potentially be installed on the rooftops of new residential buildings enabled under set the Housing Element Update. Large HVAC systems associated with new development can result in noise levels that average between 50 dBA L_{eq} and 65 dBA L_{eq} at a distance of 50 feet from the equipment. As such, noise levels from HVAC would not create new ambient noise sources that would exceed County thresholds and would adversely affect existing offsite sensitive receptors. Further, residential land uses typically have low noise levels compared to other land uses, such as agriculture. Therefore, this could potentially mean a decrease in noise impacts at the housing sites that are rezoned to residential. Taken together, operational noise from residential and mixed use development would not result in substantial increases in stationary sources and this impact would be *insignificant.*

Impact NOI-3. The proposed Project would not potentially expose adjacent sensitive receptors or structures to excessive groundborne vibration or groundborne noise levels.

Construction-Generated Ground Vibration

Construction activity can generate varying degrees of vibration, depending on the construction procedure and the construction equipment used. The operation of construction equipment generates

[5] California state law prohibits heavy-duty diesel vehicles with a Gross Vehicle Weight Rating of 10,000 pounds or more from idling for longer than 5 minutes.

vibrations that spread through the ground and diminish in amplitude with distance from the source. The degree and amplitude of groundborne vibration would vary, depending on the soil type, ground profile, distance to the receptor building, and the construction characteristics of the receptor building. The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels, and to damage to the structure and/or infrastructure at the highest levels.

Generally, vibration levels at nearby off-site receptors would be the highest during the excavation, shoring, and foundation phases, in the first months of construction. The building phase typically involves the use of smaller equipment, which produces similar vibration levels to small bulldozers (52 VdB at 500 feet from the source). During the early construction phases, the primary concern regarding construction vibration relates to building damage. Activities that can result in damage include demolition and site preparation near sensitive structures. Table 3.11-12 identifies anticipated PPV (in/sec) for standard types of construction equipment based on distance from the receptor. These continuous vibration levels would not exceed 0.1 in/sec. Development of housing projects of four or more stories is not expected to require pile driving, blasting, or other construction activities with high levels of transient vibration.

Table 3.11-12. Vibration Source Levels for Construction Equipment Typical for Low-Rise (4- to 6-story) Residential Development

Construction Equipment	Vibration Level (in/sec) at 25 feet	Vibration Level (in/sec) at 50 feet	Vibration Level (in/sec) at 100 feet
Caisson Drilling	0.089	0.042	0.019
Loaded Trucks	0.076	0.035	0.017
Jackhammer	0.035	0.016	0.008
Small Bulldozer	0.003	0.001	0.001

Source: Caltrans 2020.

Further, based on the sites inventory prepared for the Housing Element Update, potential housing projects would not lie within 25 feet of existing offsite structures that would be vulnerable to temporary vibration, and beyond this distance, vibration damage would not occur. Typical construction activities for residential projects would utilize equipment such as a large bulldozer, which generates a vibration level of approximately 0.089 in/sec at 25 feet. Construction would occur on housing development sites typically located more than 25 feet away from offsite structures, given existing required setbacks from property lines as required in County Code. The 0.1 in/sec threshold is not expected to be exceeded at offsite structures near or adjacent to housing development sites. Therefore, significant human annoyance and structural damage would not occur and impacts associated with typical construction vibration would be *insignificant.*

Land Use Generated Operational Ground Vibration

Daily operation of residential land uses anticipated to occur in the county is not anticipated to generate excessive levels of ground-borne vibration. Occasionally, vibration could occur as a result of large trucks traveling to and from individual residential developments for periodic deliveries and garbage pick-up. However, such incidences would be temporary and would not be expected to exceed the threshold of 0.1 in/sec. Therefore, operational ground-borne vibration impacts would be *insignificant*.

Impact NOI-4. The proposed Project would potentially expose new residents or workers to excessive airport noise.

Multiple potential housing sites identified in the sites inventory prepared for the Housing Element Update are within a 2-mile radius of airports, including Santa Barbara Airport, Santa Maria Airport, Santa Ynez Airport, and Cuyama Airport; there are no potential new housing sites within 2 miles of Lompoc Airport and VSFB airport. As analyzed in Section 3.10, *Land Use and Planning*, the ALUCPs include policies for noise land use compatibility at each airports. All ALUCPs require consideration of noise in land use planning in areas where airport operations generate average ambient noise levels of 55 dB L_{dn} or more, and the ALUCPs restrict residential uses in areas with high airport noise levels, including 65 dB L_{dn} in the Urban Area and 60 dB L_{dn} in Rural Area.

The sites inventory provided as part of the Housing Element Update indicates where residential development may occur under the proposed Project. While many potential housing sites fall outside the AIAs of these airports, some potential housing sites fall within an airport's AIA, including the 60-dB Ldn noise contour of the Santa Barbara Airport and Santa Maria Airport.[6] These sites would be subject to noise compatibility analysis and may result in the exposure of future residents to high noise levels. For example, based on GIS analysis of the sites inventory relative to the noise contour maps provided in the ALUCPs, it is estimated that up to 41.1 acres of potential housing sites would be subject to airport noise levels of 60-65 dB L_{dn} generated by either Santa Barbara Airport or Santa Maria Airport (Table 3.11-13). Potential rezone sites comprise approximately 40.2 acres (98 percent) of the housing area that lies within this airport noise contour, including 30.9 acres on the South Coast and 9.3 acres in the North County. All other potential future housing sites would lie outside the noise contours that could create noise compatibility issues for residential uses. Exposure to significant airport noise would adversely affect residents' quality of life and exacerbate the potential for nuisance complaints to adversely affect airport operations and safety (Section 3.8, *Hazards and Hazardous Materials*).

Table 3.11-13. Summary of Housing Potential in 60-65 dB L_{dn} Noise Contour of Airports

Airport	Housing Market Area	Sites Inventory Affected by ALUCP 60-65 dB L_{dn} Noise by Site Type (acres)	
		Existing Vacant Sites	Rezones
Santa Barbara Airport	South Coast	0	30.9
Santa Maria Airport	Santa Maria	0.9	9.3
Total		**0.9**	**40.2**

Given the potential location of housing projects in higher noise areas associated with airports, implementation of the Housing Element Update may expose people residing or working within the vicinity of airports to excessive noise levels and impacts would be *potentially significant.* Additionally, as demonstrated by existing complaints from residents outside the AIA of Santa Barbara Airport, airport noise complaints would likely increase from new residents near Santa Barbara Airport and Santa Maria Airport. Rerouting arrivals or departures to avoid noise impacts could worsen safety issues, making it infeasible to manage noise impacts from airports. Deviations from FAA standards for approach parameters pose major safety concerns.

[6] The Airport Influence Area (AIA) is a composite of the areas surrounding the airport that are affected by noise, height, and safety considerations. Land uses that falls within the AIA trigger noise compatibility review under the ALUCP to confirm that the land use is compatible with airport noise operations.

Implementation of **MM NOI-2 (Noise Study and Site-based Attenuation)** would require that applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law which are located within 2 miles of an airport prepare a noise study. This noise study would require applicants/owners of sites subject to airport noise impacts demonstrate acceptable noise standards for exterior and interior areas can be achieved through noise barriers or noise attenuating features. Implementation of this measure would ensure future development enabled under the Housing Element Update would not expose future residents and sensitive receptors to excessive airport noise, and impacts would be *significant but mitigation.*

3.11.5.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding incorporated cities (Tables 3-6, 3-7, and 3-8; Appendix I). Cumulative noise impacts would occur if individual housing development projects enabled under the Housing Element Update and cumulative development projects would affect the same noise environment Such cumulative projects would range from programmatic projects such as the Accessory Dwelling Unit (ADU) Ordinance Amendments, the Agricultural Enterprise Ordinance (AEO), and development and annexations proposed under the general plans and housing elements of several cities within the county, as well as individual development projects.

Construction Noise and Vibration

As discussed in Impact NOI-1, while it is not possible to estimate the construction noise levels or provide the construction schedule of individual residential development projects, it is reasonably foreseeable that construction projects could occur proximate to one another with sometimes concurrent or overlapping schedules, temporarily elevating noise levels in the immediate area. For example, construction noise from construction activities associated with one project could be combined with nearby construction projects to create noise impacts on nearby residential neighborhoods. However, noise is not strictly additive, and a doubling of noise sources would not cause a doubling of noise levels, but rather could result in a perceptible noise increase over a single source. Compliance with the County's Noise Ordinance would reduce construction-related noise impacts. In addition, **MM NOI-1** and **MM NOI-2** would address construction noise to mitigate potential impacts. Therefore, the proposed Project would not result in a substantial contribution to cumulatively considerable construction noise impacts, and cumulative impacts would be *significant but mitigable*.

As discussed in Impact NOI-3, construction activities anticipated to occur under the proposed Project would involve the use of construction equipment that could produce temporary vibration levels. Depending on the individual residential development project and its location, construction projects occurring concurrently could generate construction ground-borne vibration that could cumulatively affect the same sensitive receptors. However, construction vibration would be contained within each site and the 0.1 in/sec threshold is not expected to be exceeded at offsite structures near or adjacent to housing development sites. Therefore, significant human annoyance and structural damage would not occur when the proposed Project is combined with offsite cumulative projects and cumulative impacts related to construction vibration would be *insignificant*.

Operational Noise and Vibration

Cumulative ambient noise impacts from operations would occur primarily as a result of incremental increases in traffic volumes on local roadways and highways (e.g., U.S. Highway 101, SR 217, SR 135). The proposed Project would contribute a substantial increase in Annual ADT, which would increase roadway noise on local roads directly serving housing sites, as described in Impact NOI-2. Cumulative projects would also increase Annual ADT on highways, but the cumulative effect of the proposed Project on ambient noise levels is not expected to be significant because existing noise levels on regional highways serving regional cumulative growth already have high noise levels. Further, **MM NOI-2** would ensure that the proposed Project would maintain interior noise levels below County thresholds and **MM T-1** would help reduce the Project's contribution to Annual ADT, thereby avoiding significant Project impacts related to transportation noise and reducing cumulative impacts to a *significant but mitigable* level.

Operational noise would also be generated from a number and variety of stationary sources. A major stationary source includes structural mechanical equipment such as HVAC systems. While there is a potential for an increase in stationary noise sources to produce a cumulative increase in noise, new residential development projects planned for under the Housing Element Update are not anticipated to result in substantial operational noise or ground-borne vibration generators, such as helipads, airports, or heavy industrial areas. Therefore, cumulative impacts related to operational noise and vibration would be *insignificant*.

Excessive Airport Noise

Under the Housing Element Update, new residential development could be constructed within 60-65 dB L_{dn} noise contours of Santa Barbara Airport and Santa Maria Airport. However, this potential residential development in combination with other cumulative projects is not anticipated to further expose people to excessive noise levels associated with airport operations. Therefore, cumulative impacts would be *insignificant*.

3.11.5.4 Proposed Mitigation

MM T-1 (Site-based TDM) shall apply to reduce transportation noise generated by Project-related Annual ADT.

MM NOI-1: Construction Hours. For future residential and mixed use development resulting from the proposed Project, all construction activity, including equipment maintenance and site preparation, shall be limited to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday, or as otherwise specified in a community plan. No construction shall occur on weekends or state holidays. Non-noise-generating construction activities, such as interior plumbing, electrical, drywall, and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) are not subject to these restrictions.

Plan Requirements and Timing: County P&D shall confirm that this construction hours standard shall be printed on all building and grading plans. The applicant/contractor shall post signage stating these restrictions at all construction site entries. Signs shall be posted before the commencement of construction and maintained throughout construction.

Monitoring: County P&D's permit processing planner shall check plans to ensure this standard is required before the issuance of a permit for the development and pre-construction meeting.

P&D compliance monitoring staff shall spot-check in the field throughout grading and construction.

MM NOI-2: Noise Study and Site-based Attenuation. Applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include a site-specific noise study that documents the existing noise conditions on site and recommends attenuation strategies and techniques to address sensitive receptors and achieve acceptable noise levels under County standards. An onsite noise study shall be performed by an acoustical engineer. The noise study shall measure and report the existing ambient Average Day-Night (L_{dn} or CNEL) noise environment within the project site, including transportation noise sources and any transient or nuisance noise sources. Based on project details, the noise study shall identify and quantify the potential project-related noise sources from construction and operation. All noise control techniques and recommendations in this report shall be incorporated into the project design to reduce exterior noise to at or below 65 dBA and interior noise to at or below 45 dBA.

Construction noise assessment shall consider both transient and continuous noise sources, including equipment used by each project phase. To address construction noise, the noise study shall:

- Identify noise control measures to ensure construction noise that exceeds 65 dBA is contained within the project site and does not affect sensitive receptors in the project vicinity per County thresholds, including acoustical shielding, sound blankets, engine mufflers, and designated construction routes.
- Identify and notify properties within 500 feet of the project site that will receive notification of proposed construction timelines and noise complaint procedures to minimize potential annoyance or nuisance complaints related to construction noise no less than 10 days before initiation of any grading and construction activity.

Operational noise shall consider both stationary noise, including HVAC and utilities, transportation noise, including permanent increases in roadway noise and periodic peak noise from trucks and other services, and airport noise. To address operational and transportation noise, the noise study shall:

- Document that the proposed project is not within 1,000 feet of a highway or major roadway, 3,000 feet of a railroad, or 2 miles of an airport. If the project is within any of those distances, then either:
    - Provide documentation showing the ambient noise level in all areas of the project site would be at or below 65 dB L_{dn}, or
    - Provide documentation showing that there is an effective noise barrier or noise attenuating feature of the project that reduces the ambient noise level in all areas of the project site at or below 65 dB L_{dn}, or
    - Provide documentation showing the ambient noise level in areas of the project site that would contain sensitive receptors including residences and recreational areas at would be below 75 dB L_{dn} and identifying noise attenuation requirements that will bring the interior noise level to 45 dB L_{dn} and/or exterior noise level to 65 dB L_{dn}. Including the feasibility of noise barriers, site design, building orientation, and other features to meet prescribed exterior noise standards. An analysis of the noise insulation effectiveness of the proposed construction shall be documented, showing

that the building design and construction specifications are adequate to meet the prescribed interior noise standard.

Requirements and Timing: The required noise study shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations of the noise study are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans.

Monitoring: County P&D shall ensure that the noise study is included as part of the project application and that all recommendations of the noise study are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that all required construction noise noticing and attenuating techniques and activities are completed before ground disturbance. Building inspectors shall ensure that all noise control measures have been built or incorporated according to the approved plans. If an acoustical survey is required, County P&D compliance monitoring staff will ensure that recommended onsite noise levels have been reached before the Final Building Inspection Clearance.

3.11.5.5 Secondary Impacts

Implementation of **MM NOI-1** and **MM NOI-2** would not result in adverse secondary impacts.

3.11.5.6 Residual Impacts

Impact NOI-1. Future construction of residential and mixed use developments would generate transient and continuous noise from equipment and heavy haul trucks subject to existing County grading regulations. **MM NOI-1 (Construction Hours)** and **MM NOI-2 (Site-Specific Noise Study)** would apply to control construction noise generated from specific equipment and phases of development, as well as limit the duration and timing of construction to minimize adverse impacts on sensitive receptors. With this mitigation, the noise impacts from temporary construction would be substantially reduced consistent with County construction noise standards, and impacts would be *significant but mitigable*.

Impact NOI-2. Future new housing development enabled under the Housing Element Update would generate an incremental increase in localized ambient noise due to the routine delivery of goods and weekly trash hauling, which are typical in the urban noise environment, including residential neighborhoods. The increased Project-related transportation noise on affected roadways could be substantial and exceed the County's noise threshold of 3 dBA, which is the increase in noise level that is generally perceptible to the human ear. **MM NOI-2** would require multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include a site-specific noise study that documents the existing noise conditions on site, recommends attenuation strategies and techniques to address sensitive receptors, and reduce exterior noise to at or below 65 dBA and interior noise to at or below 45 dBA. Further, **MM T-1 (Site-based TDM)** would reduce the proposed Project's Annual ADT to help ensure its contribution to ambient roadway noise is substantially reduced on local roadways. Together, these measures would substantially reduce operational transportation noise impacts below County thresholds, and the impact would be *significant but mitigable*.

Impact NOI-3. Construction would occur on housing development sites typically located more than 25 feet away from offsite structures, given existing required setbacks from property lines. Operation

of residential and mixed use development would not generate substantial vibration. The 0.1 in/sec threshold is not expected to be exceeded at offsite structures near or adjacent to housing development sites. Therefore, significant human annoyance and structural damage would not occur, and impacts associated with typical construction vibration would be *insignificant.*

Impact NOI-4. Airports in the county generate high noise levels and residential uses are incompatible with airport noise above 65 dB L_{dn}. Up to 41.1 acres of potential new housing would be subject to airport noise levels of 60-65 dB L_{dn} generated by either Santa Barbara Airport or Santa Maria Airport. Given the potential location of housing projects in higher noise areas associated with airports, implementation of the Housing Element Update may expose people residing or working within the vicinity of airports to excessive noise levels. **MM NOI-2 (Noise Study and Site-based Attenuation)** would require that applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law which are located within 2 miles of an airport prepare a noise study. This noise study would require applicants/owners of sites subject to airport noise impacts demonstrate acceptable noise standards for exterior and interior areas can be achieved through noise barriers or noise attenuating features. Implementation of this measure would ensure future development enabled under the Housing Element Update would not expose future residents and sensitive receptors to excessive airport noise, and impacts would be *significant but mitigation.*

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Section 3.12
Population and Housing

3.12.1 Introduction

This section describes potential impacts related to population and housing that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). The analysis presented includes summary-level data related to population, employment, and housing trends within the unincorporated county, as well as the applicable regulations pertaining to the proposed Project. Population growth, in and of itself, does not constitute a physical impact on the environment. However, unplanned population growth could present potential planning consistency issues with local, state, and regional plans, such as the 2050 Connected Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and regional growth forecasts prepared by SBCAG and the County.

Unplanned population growth may also generate direct and indirect environmental impacts as defined under the California Environmental Quality Act (CEQA), such as increased demands for public services, surpassing of infrastructure capacities, or increased vehicle trips resulting in criteria air pollutant emissions and greenhouse gas (GHG) emissions. Additionally, potential residential and mixed use development relates to community development issues, such as providing affordable and workforce housing, integrating housing with transit to minimize vehicle miles traveled (VMT), energy demand, and GHG emissions while creating a housing supply that aids in alleviating the housing crisis in Santa Barbara County and statewide. These direct and indirect environmental effects related to population growth are addressed in the applicable sections of this Program Environmental Impact Report (EIR). (See Section 3.3, *Air Quality,* Section 3.6, *Energy,* Section 3.7, *Greenhouse Gas Emissions,* Section 3.13, *Public Services and Recreation,* Section 3.14, *Transportation,* and Section 3.15, *Utilities and Water Supply*.)

3.12.2 Environmental Setting

As described in Chapter 2, *Project Description*, the county has been divided into five general regions (referred to as Housing Market Areas [HMAs]) for planning purposes: Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and South Coast. The population, employment, and housing characteristics of these regions vary significantly, with lower population densities in rural agricultural areas and greater population densities and employment opportunities surrounding the incorporated cities in the Urban Area, particularly on the South Coast.

The U.S. Census Bureau publishes population and housing statistics based on the U.S. Census and the American Community Survey (ACS). The U.S. Census is published every 10 years and includes population, employment, and housing data for the entire country, including the official count of the entire U.S. population. ACS 1-year estimates are data that have been collected over a 12-month period and are available for geographic areas with at least 65,000 people. The U.S. Census Bureau combines five consecutive years of ACS data to produce multi-year estimates for geographic areas with fewer than 65,000 residents. The California Department of Finance (DOF) also publishes detailed analyses of the U.S. Census data. Together, these data sources are used as the baseline from which most demographic projections are calculated among local and regional jurisdictions.

Notably for this Program EIR, the U.S. Census Bureau does not provide HMA-level data as the HMA boundaries are based on local plans. Also, while the U.S. Census data is available for many unincorporated communities (i.e., Census-designated places [CDP]), the U.S. Census Bureau does provide specific data broken down only for the unincorporated areas of the county (i.e., countywide data excluding incorporated cities). Therefore, for select data at the unincorporated level, Santa Barbara County Association of Governments (SBCAG) data is used from the Regional Growth Forecast and the Connected 2050 RTP/SCS. Additionally, the U.S. Census Bureau, DOF, and SBCAG estimates vary. This results in some variation between population and household sizes, depending on the metrics for which data is being aggregated. As a result, the data employed in this Program EIR for unincorporated areas by HMA represents the best data available to support an overarching snapshot of the population characteristics and housing conditions of the area, but the data may not represent precise counts. This Program EIR utilized the best available data at the time of drafting, including new data that was not available at the time of drafting the Housing Element Update (e.g., 2015- 2019 vs 2017-2021 ACS data)

3.12.2.1 Demographics

Population

According to the U.S. Census Bureau, and as reported in the SBCAG population overviews for Santa Barbara County, the county as a whole has grown at a slower rate than the State of California over the last 10 years. The 2020 U.S. Census indicates the population of the county is 448,229, with an unincorporated population of 140,115 (31.3 percent) and an incorporated city population of 308,114 (68.7 percent). As a whole, the county experienced 5.7 percent growth in population between 2010 and 2020, growing by 24,334 residents (Table 3.12-1). However, this population growth was mainly associated with increases in the population of the incorporated cities; approximately 47 percent of total countywide population growth between 2010 and 2020 occurred in the City of Santa Maria alone. Within the unincorporated regions of the county, the population has grown at a rate of 5.0 percent. For comparison, the State of California experienced approximately 6.1 percent growth from 2010 to 2020, growing by nearly 2.3 million residents (SBCAG 2021b).

Table 3.12-1. U.S. Census Total Population 2010-2020

		2010	2020
Santa Barbara County (whole)	Total population	423,895	448,229
	Growth in previous 10 years	--	+5.7%
Santa Barbara County (unincorporated)	Total population	133,415	140,115
	Growth in previous 10 years	--	+5.0%
State of California	Total population	37,254,522	39,538,223
	Growth in previous 10 years	--	+6.1%

Sources: U.S. Census Bureau 2010, 2020b.

Santa Barbara County has 19 unincorporated communities (i.e., CDPs) comprising the majority of the unincorporated population within distinct urbanized areas in each HMA. Table 3.12-2 provides U.S. Census population estimates for each unincorporated community in the county in 2010 and 2020, as well as the growth rate from 2010 and 2020. In general, most communities experience modest or nominal growth, while some saw more substantial increases or decreases in total population. For example, Vandenberg Village in Lompoc Valley experienced a 12.5 percent increase in total population, while Summerland on the South Coast experienced a 15.6 percent decrease in total population.

Table 3.12-2. U.S. Census Unincorporated Community Population Estimates 2010-2020

Community/CDP	2010 Population	2020 Population	Percent Change (2010 – 2022)
Santa Maria Valley			
Orcutt	28,905	32,034	10.8%
Garey	68	72	5.9%
Sisquoc	183	191	4.4%
Casmalia	138	147	6.5%
Cuyama Valley			
Cuyama	57	37	-35.1%
New Cuyama	517	542	4.8%
Lompoc Valley[1]			
Mission Hills	3,576	3,571	-0.1%
Vandenberg Village	6,497	7,308	12.5%
Vandenberg Space Force Base (VSFB)	3,338	3,559	6.6%
Santa Ynez Valley			
Los Alamos	1,890	1,839	-2.7%
Los Olivos	1,132	1,202	6.2%
Santa Ynez	4,418	4,505	2.0%
Ballard	467	768	64.5%
South Coast			
Eastern Goleta Valley[2]	N/A	28,656	N/A
Mission Canyon	2,381	2,540	6.7%
Montecito	8,965	8,638	-3.6%
Summerland	1,448	1,222	-15.6%
Toro Canyon	1,508	1,835	21.7%
Isla Vista	23,096	15,500	-32.9%

Notes:
[1] Vandenberg Space Force Base is in the unincorporated area of the county but is federally owned and outside the jurisdiction of the County.
[2] Eastern Goleta Valley was not an established CDP in 2010; therefore, U.S. Census population data is unavailable for Eastern Goleta Valley in 2010.
Sources: U.S. Census Bureau 2020a; U.S. Census Bureau and DOF 2010, 2020.

Population Growth Forecast

Understanding potential population growth projections is an important consideration in assessing the housing needs of a community or region. Population growth increases the demand for housing and relates to jobs and economic activities in a region. Population growth projections can indicate where there may be increasing pressure on existing housing stock, requiring more housing to meet the growing demand.

According to SBCAG's 2050 Regional Growth Forecast for Santa Barbara County, the population of the unincorporated county is 143,000 as of 2020 and is projected to increase by 6.9 percent from 2021 to 2050, for a total 2050 population of 152,900 (SBCAG 2019; Table 3.12-3). By unincorporated region, SBCAG estimates that the South Coast is projected to grow in population by 5.9 percent from 2020 to

2050, which would represent the lowest growth rate of the unincorporated regions but the greatest increase in population with 4,640 residents. The Santa Maria Valley and Cuyama Valley are estimated to experience the highest growth rates from 2021 to 2050 with growth of 8.3 percent and an additional 3,150 residents combined between the two regions; given land use and development patterns, it is anticipated that most of this estimated growth would occur in the Santa Maria Valley. Santa Ynez Valley and Lompoc Valley populations are both anticipated to increase by 6.7 percent, which would result in an additional 920 residents in Santa Ynez Valley and 1,130 residents in Lompoc Valley (SBCAG 2019).

Table 3.12-3. SBCAG Population Growth Forecast

		2020	2030	2035	2040	2050	Change (2020-2050)
Santa Barbara County (Whole)	Population	460,900	489,900	501,500	513,300	521,700	60,800 (+13.2%)
	Households	152,000	166,000	173,000	180,500	186,900	34,900 (+23.0%)
	Employment	231,150	252,710	259,710	266,900	280,700	49,550 (+21.4%)
Santa Barbara County (Unincorporated)	Population	143,000	146,900	149,100	151,300	152,900	9,900 (+6.9%)
	Households	46,900	49,300	51,000	52,700	54,300	7,400 (+15.8%)
	Employment	49,540	54,160	55,660	57,200	60,150	10,610 (+21.4%)

Source: SBCAG 2019.

Age

Understanding the age distribution of a population is an important consideration in assessing the housing needs of a community or region. For example, increases in the senior population may indicate a need for smaller, accessible units while growing numbers of middle-aged adults and/or children may indicate a need for housing with multiple bedrooms to suit families with children.

The median age of residents of Santa Barbara County is 33.8 years, according to the 2015-2019 ACS estimates (U.S. Census Bureau 2019). This indicates a slight increase in median age from the 2010-2015 ACS, which was 33.6 years. Table 3.12-4 provides a summary of the population by age for the county as a whole and the unincorporated county.

The largest age group in the whole county is age 25-44 (approximately 25 percent), while the largest age group in the unincorporated areas of the county is age 45-64 (approximately 24 percent). When compared to the county as a whole, the unincorporated county has an older population with a greater proportion of adults ages 45-64 and 65 or older (approximately 22 percent versus 24 percent and approximately 18 percent versus 15 percent, respectively). The unincorporated county also has a larger proportion of young adults ages 18-24 (19 percent versus 16 percent, respectively), which is likely attributable to students attending local community colleges and universities and residing in nearby unincorporated communities (U.S. Census Bureau 2019).

Table 3.12-4. U.S. Census Population by Age Group

	Under 18	18-24	25-44	45-64	65+
Santa Barbara County (Whole)	99,180 (22%)	70,551 (16%)	109,548 (25%)	98,977 (22%)	66,563 (15%)
Santa Barbara County (Unincorporated)	29,197 (19%)	30,329 (19%)	30,972 (20%)	37,824 (24%)	28,844 (18%)

Note: Percentages less than or greater than 100 (i.e., 99.9 and 100.1 percent) are due to rounding.
Source: U.S. Census Bureau 2019.

3.12.2.2 Housing Stock and Household Characteristics

The U.S. Census Bureau, DOF, and SBCAG each track and provide housing stock and household characteristics data for the county, including housing stock, size, and age and condition as well as household tenure and vacancy rates that help to inform housing needs.

Housing Stock Growth

According to SBCAG's 2020 Census Summary, in 2020, the county as a whole had a housing stock of 158,279 units, of which approximately 50,400 units were located in the unincorporated areas of the county (SBCAG 2021b). This represents increases of 5,445 and 1,215 housing units or 3.6 and 2.5 percent, respectively, from the 2010 housing stock (Table 3.12-5). From 2010 to 2020, Santa Barbara County experienced a 5.7 percent increase in population and a 3.6 percent increase in housing units. This means that for every new housing unit, 4.5 people were added to the population. This ratio of population-to-housing unit growth is significantly higher than the ratio for the previous decade (2.42 additional persons per new housing unit) but lower than the ratio for 1990-2000 (6.50 additional persons per new housing unit) (SBCAG 2021b).

Table 3.12-5. SBCAG Housing Unit Stock Growth (2010 -2020)

	2010	2020	Change (2010-2020)
Santa Barbara County (Whole)	152,834	158,279	5,445 (+3.6%)
Santa Barbara County (Unincorporated)	49,185	50,400	1,215 (+2.5%)

Sources: SBCAG 2021b.

Household Vacancy

The U.S. Census Bureau and SBCAG also track the number of households that differs from the number of housing units which count both occupied and vacant units. A household is an occupied housing unit and includes all persons residing in that unit (U.S. Census Bureau 2023). Between 2017 and 2021, the average household size of the county was 2.89 (U.S. Census Bureau 2021). Table 3.12-6 shows housing unit vacancy for the county in 2020.

Vacancy rates indicate how efficiently housing units available for sale or rent are meeting the current housing demand. Low vacancy rates may indicate a lack of available, affordable housing and a high level of competition for available units, leading to higher prices and rents. Vacancy rates of 5 to 6 percent for rental units and 2 to 3 percent for ownership units are generally considered healthy. As shown in Table 3.12-6, the countywide vacancy rate in 2020 was 6.3 percent, and the vacancy in the

unincorporated area 7.8 percent. While the overall countywide vacancy rate is considered healthy at approximately 6.3 percent, this data is skewed by higher levels of vacation or seasonal use properties in the county with higher vacancy than year-round residents (U.S. Census Bureau 2021).

Table 3.12-6. Santa Barbara County Vacancy Rates (2020)

Jurisdiction	Year	Housing Units	Occupied Housing Units	Vacant Units	Vacancy Rate
Santa Barbara County (Whole)	2020	158,279	148,353	9,926	6.3%
Santa Barbara County (Unincorporated)	2020	50,400	46,456	3,944	7.8%

Source: SBCAG 2021b; U.S. Census Bureau 2020a; U.S. Census Bureau and DOF 2020.

Housing Unit Type

Single-family homes make up the majority of housing types, representing approximately 64.2 percent of units countywide, and 75.6 percent of units in the unincorporated area in 2021 (Table 3.12-7). However, the multifamily housing stock has steadily increased over the past decade, with an approximately 10.2 percent increase in units countywide and 5.6 percent increase in the unincorporated county. Comparatively, the single-family housing stock has increased by only 2.8 percent countywide and 2.1 percent in the unincorporated area (Table 3.12-7).

Table 3.12-7. Housing Units by Type (2010 and 2021)

	2010		2020		Change	
	Units	Percent	Units	Percent	Units	Percent
Santa Barbara County						
Single-family Detached	89,896	58.8	91,508	57.1	1,612	1.8
Single-family Attached	10,162	6.5	11,319	7.1	1,157	11.4
Total Single-family	*100,058*	*65.3*	*102,827*	*64.2*	*2,769*	*2.8*
Multifamily (2-4 units)	14,732	9.6	16,080	10.0	1,348	9.2
Multifamily (5+ units)	30,156	19.7	33,387	20.8	3,231	10.7
Total Multifamily	*44,888*	*29.3*	*49,467*	*30.8*	*4,579*	*10.2*
Mobile Homes	7,888	5.2	8,040	5.0	152	1.9
Total	**152,834**	**100.0**	**160,333**	**100.0**	**7,499**	**4.9**
Unincorporated Santa Barbara County						
Single-family Detached	34,781	70.7	35,483	69.8	702	2.0
Single-family Attached	2,967	6.0	2,971	5.8	4	0.1
Total Single-family	*37,748*	*76.7*	*38,454*	*75.6*	*706*	*2.1*
Multifamily (2-4 units)	2,575	5.2	2,681	5.3	106	4.1
Multifamily (5+ units)	5,901	12.0	6,591	12.9	90	1.5
Total Multifamily	*8,476*	*17.2*	*9,272*	*18.2*	*196*	*5.6*
Mobile Homes	2,959	6.0	3,146	6.2	187	6.3
Total	**49,183**	**100.0**	**50,871**	**100.0**	**1,688**	**3.4**

Source: DOF 2021, 2023; U.S. Census Bureau 2019.

Housing Age and Condition

Approximately 89 percent of the housing stock countywide and 88 percent of the housing stock in just the unincorporated county is over 30 years old, with the largest portion being constructed between the years of 1960 and 1989 (Table 3.12-8) (U.S. Census Bureau 2019).

Table 3.12-8. U.S. Census Housing Units by Age

Age	Total County		Total Unincorporated	
	#	%	#	%
Total Units	**157,143**	**100.0**	**59,794**	**100.0**
Built 2010-2019	5,500	3.5	2,009	3.4
Built 2000-2009	12,257	7.8	5,249	8.8
Built 1990-1999	15,557	9.9	6,719	11.2
Built 1980-1989	23,414	14.9	9,569	16.0
Built 1970-1979	29,071	18.5	11,861	19.8
Built 1960-1969	31,586	20.1	13,150	22.0
Built 1950-1959	20,114	12.8	6,391	10.7
Built 1940-1949	6,129	3.9	1,738	2.9
Built Before 1940	13,515	8.6	3,108	5.2

Source: U.S. Census Bureau 2019.

Size and Tenure

As of 2019, approximately 66 percent of households countywide and within the unincorporated area are families, while the number of households occupied by individuals living alone is approximately 20 percent (U.S. Census Bureau 2019). Consistent with household size, three-bedroom units are the most commonly available households in the county, accounting for approximately 35.5 percent of the market countywide and 37.6 percent of the market in just the unincorporated area. The second most common type of units are two-bedroom units, which account for 27.4 percent of the market countywide and 25.0 percent of the market in just the unincorporated area. Five-bedroom units represent the smallest category of housing units on the market countywide with approximately 3.4 percent, while zero-bedroom units or studio apartments represent the smallest category for the unincorporated county with only 2.8 percent (Table 3.12-9).

The tenure of housing refers to whether a housing unit is owned, rented, or vacant. Tenure is an important indicator of well-being in a community because it reflects the cost of housing and the ability of residents to own or rent a unit. Countywide, approximately 52 percent of households own their home while approximately 48 percent rent their homes (Table 3.12-9). However, the ownership rate is notably higher in the unincorporated county compared to countywide (approximately 63 percent versus approximately 52 percent) (U.S. Census Bureau 2019).

Table 3.12-9. Housing Units by Tenure and Number of Bedrooms

	0-BR		1-BR		2-BR		3-BR		4-BR		5-BR		Total
	#	%	#	%	#	%	#	%	#	%	#	%	
Countywide	**5,025**	**3.4**	**20,308**	**13.9**	**39,895**	**27.4**	**51,709**	**35.5**	**23,990**	**16.4**	**4,929**	**3.4**	**145,856**
Renter	4,594	6.6	18,602	26.6	25,817	36.9	15,643	22.4	4,529	6.5	726	1.0	69,911
Owner	431	0.6	1,706	2.2	14,078	18.5	36,066	47.5	19,461	25.6	4,203	5.5	75,945
Unincorporated	**1,614**	**2.8**	**6,286**	**11.0**	**14,317**	**25.0**	**21,543**	**37.6**	**10,933**	**19.1**	**2,534**	**4.4**	**57,226**
Renter	1,485	6.1	5,598	22.8	8,720	35.6	6,359	25.9	2,094	8.5	261	1.1	24,516
Owner	129	0.4	688	2.1	5,597	17.1	15,184	46.4	8,839	27.0	2,273	6.9	32,710

Source: U.S. Census Bureau 2019.

3.12.2.3 Employment

Santa Barbara County has a diverse economy with various industry sectors. The majority of countywide jobs are located on the South Coast, with 133,000 jobs or 60 percent of the total county jobs, and the North County has 89,000 jobs, or 40 percent, of total jobs (SBCAG 2019). Employment can also be analyzed by the types of industries in which employees work. Table 3.12-10 provides the current distribution of industries in Santa Barbara County based on 2022 ACS data. Education, health care, and social assistance occupations are the most common employment industries category of county residents (20.6 percent), followed by arts, entertainment, and food/hospitality industries (13.3 percent) and professional, management, and administrative employment (13.1 percent). The least common occupation category is wholesale trade (1.7 percent) and information industries (2.1 percent) (U.S. Census Bureau 2022).

Table 3.12-10. Industries for Santa Barbara County Residents 16 Years and Over (2022)

Industry	Percentage of Total Jobs
Agriculture, forestry, fishing and hunting, and mining	6.7%
Construction	6.5%
Manufacturing	6.8%
Wholesale trade	1.7%
Retail trade	11.1%
Transportation and warehousing, and utilities	4.3%
Information	2.1%
Finance and insurance, and real estate and rental and leasing	4.3%
Professional, scientific, and management, and administrative and waste management services	13.1%
Educational services, and health care and social assistance	20.6%
Arts, entertainment, and recreation, and accommodation and food services	13.3%
Other services, except public administration	4.6%
Public administration	4.8%

Source: U.S. Census Bureau 2022.

A regional balance of jobs to housing helps to ensure the demand for housing is reasonably related to supply. When the number of jobs significantly exceeds the housing supply, the rental and for-sale housing markets experience low availability rates and high demand. This requires households to pay a larger share of their income on housing (i.e., cost burden) and results in overcrowding, as well as longer commutes as workers seek more affordable housing in outlying areas or other counties.

Jobs-to-housing ratios can be used as an indicator of economic vitality and quality of life. Ratios of more jobs than housing may lead to issues of housing unaffordability and traffic congestion from commutes, as there is not sufficient housing to accommodate all the workers in the area. SBCAG analyzed this ongoing challenge for the county and how to resolve the jobs-to-housing imbalance through the Connected 2050 plan (SBCAG 2021c).

Countywide, the jobs-to-household ratio is expected to remain relatively stable over the next three decades at approximately 1.48 to 1.52, without additional housing supply Additionally, while data is not available by HMA for the last 30 years, a large proportion of job-producing commercial and

industrial growth relative to the amount of new housing has been permitted in the cities on the South Coast. This causes higher costs of living and housing on the South Coast due to housing demand, which results in high commuter levels from northern Santa Barbara County and Ventura County for residents seeking more affordable housing with the consequence of longer commutes. Consistent with this data, the ACS 2015-2019 estimates approximately 32 percent of residents in the North County commuted for at least 30 minutes to a job compared to 13 percent of residents living on the South Coast (SBCAG 2021c).

Employment Growth Forecast

The 2017-2050 Regional Growth Forecast prepared by SBCAG addresses regionwide employment projections in the context of national and state projections. Table 3.12-11 depicts regional growth forecasts per industry through 2050. Historically, job growth in Santa Barbara County has generally tracked state and national growth. Job growth in the county has trailed the state average since 1990 but is projected to equal the state average growth rate by 2050. Job levels in the county grew more slowly than the national average between 1990 and 2007, but job growth did outpace the national average between 2007 and 2017 and is projected to slightly outpace the national average by 2050 (SBCAG 2019).

Agriculture jobs are forecast to remain steady long-term. By the year 2050, the agricultural sector is projected to experience an increase in jobs by approximately 800. Manufacturing job declines are anticipated to ease but no job growth is projected in this sector; by 2050, the manufacturing sector is projected to decline by 500 jobs. Mining jobs are projected to rebound from the recent decline in 2017 with a slight 400 job increase. Construction jobs are projected to increase as housing starts to recover and long-term infrastructure spending surges; the construction sector is projected to add 5,500 new jobs by 2050. Professional and Business Services and Education and Health Care jobs will continue their above-average growth trends and account for a large share of future job growth in these forecasts – 11,600 jobs and 14,700 jobs, respectively. Government jobs are projected to grow at a slower pace than population (with 7,700 new jobs by 2050) as school enrollment remains near current levels as a result of declining birth rates. Leisure and hospitality jobs are expected to grow by 6,300. Additionally, the number of self-employed workers is projected to increase in part as a result of gig economy growth (SBCAG 2019; Table 3.12-11).

3.12.3 Regulatory Setting

State and local regulations have been enacted to address the planning for population growth and the provision of housing across jurisdictions. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts. There are no federal regulations that pertain to this population and housing analysis.

Table 3.12-11. SBCAG Regional Employment Forecasts

Economic Sector	Growth (1,000 jobs)							Change 2017-2050 (thousands)
	2017	2025	2030	2035	2040	2045	2050	
Agriculture/Farm	21.5	23.9	24.1	23.4	23.7	23.0	22.3	0.8
Natural Resources and Mining	0.9	1.1	1.1	1.2	1.2	1.2	1.3	0.4
Construction	8.4	10.7	11.3	11.8	12.4	13.1	13.9	5.5
Manufacturing	13.1	12.4	12.4	12.4	12.4	12.5	12.6	-0.5
Wholesale Trade	5.1	5.3	5.4	5.6	5.8	6.0	6.3	1.2
Retail Trade	18.9	19.3	19.5	19.7	19.8	19.8	19.8	0.9
Transportation, Warehousing, and Utilities	3.3	3.9	4.0	4.0	4.1	4.1	4.2	0.9
Information	5.0	5.6	5.8	6.0	6.3	6.6	7.0	2.0
Financial Activities	6.6	7.1	7.2	7.3	7.4	7.4	7.5	0.9
Professional and Business Services	21.4	26.9	27.9	28.9	30.0	31.4	33.0	11.6
Educational and Health Services	27.5	32.8	34.5	36.3	38.5	40.1	42.2	14.7
Leisure and Hospitality	27.7	29.5	30.5	31.5	32.6	33.3	34.0	6.3
Other Services	6.0	6.4	6.6	6.7	6.9	7.0	7.2	1.2
Government	38.9	41.9	42.7	43.5	44.4	45.5	46.6	7.7
Self Employed	18.0	19.2	19.9	20.6	21.4	22.1	22.9	3.9
Total	**222.3**	**245.9**	**252.8**	**259.0**	**266.9**	**273.4**	**280.7**	**58.4**

Source: SBCAG 2019.

3.12.3.1 State

State Housing Element Law

State law (Government Code Section 65580-65589.8) recognizes the vital role local governments play in the supply and affordability of housing. Local governments in California are required to adopt a comprehensive, long-term general plan for the physical development of the jurisdiction, including a Housing Element. Housing Element law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems, which provide opportunities for and do not unduly constrain housing development. Additionally, if a sites inventory demonstrates that there are insufficient sites to accommodate the Regional Housing Needs Assessment (RHNA) for each income category, a jurisdiction must identify sites for rezoning to be included in a housing element program to identify and make available additional sites to accommodate those housing needs within the planning period (State of California Department of Housing and Community Development [State HCD] 2020). State housing law also requires the State HCD to review local housing elements for compliance with state law and to report its written findings to the local government.

California Coastal Act

The Coastal Act guides how the land along the coast of California is developed or protected from development; emphasizes the importance of the public being able to access the coast, and the preservation of sensitive coastal and marine habitat and biodiversity; and dictates that development be clustered in areas to preserve open space, and that coastal agricultural lands be preserved. In addition, Section 3007 (Housing; Local government) of the Coastal Act dictates that "nothing in this division shall exempt local governments from meeting the requirements of state and federal law with respect to providing low- and moderate-income housing, replacement housing, relocation benefits, or any other obligation related to housing imposed by existing law or any law hereafter enacted." Therefore, any proposed development that would threaten affordable housing in the Coastal Zone is required to preserve or replace such affordable housing.

3.12.3.2 Local

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan (inclusive of mandatory and optional Elements) provides general goals, policies, and programs applicable to population/growth and the provision of housing within the unincorporated portions of the county. The Comprehensive Plan is required to maintain internal consistency between all adopted elements. Consistency of the proposed Project with specific policies is discussed in Section 3.10, *Land Use and Planning*.

Land Use Element

The Land Use Element contains the broadest scope of all components within the County's Comprehensive Plan. The Land Use Element defines the blueprint for physical development with goals, policies, actions, and development standards that provide the framework for physical development and use of land within the unincorporated areas of the county and provides for goals, policies, actions, and development standards specific to adopted local community plans. It includes regional fundamental and overarching goals and policies relating to population, housing, economy, and employment.

2015-2023 Housing Element

The Housing Element is mandated by Government Code Sections 65580 to 65589.9. State Housing Element law requires that each county identify and analyze existing and projected housing needs within its jurisdiction and prepare goals, policies, programs, and quantified objectives to further the development, improvement, and preservation of housing. The goals, policies, and programs provided in the 5th Cycle Housing Element Update focus on the protection and provision of housing in the unincorporated county to meet housing needs determined through the 2015-2023 RHNA, including but not limited to affordable housing, special needs population housing, and furthering fair housing. Under state housing law, the 5th Cycle Housing Element must be updated to address the 2023-2031 6th Cycle RHNA.

Community Plans

Santa Barbara County has 10 community or area plans. Each community plan contains goals, policies, and standards guiding the development of the community it serves and supplements the policies and

goals of the Comprehensive Plan. Community plans with key policies pertaining to new development related to the proposed Project are described below.

Eastern Goleta Valley Community Plan:

The Eastern Goleta Valley Community Plan provides growth projections based on land use plans and prioritizes neighborhood development in strategic locations near commercial and employment destinations, schools, parks, and multimodal transportation facilities. Key policies related to population and housing include the following:

Policy LUR-EGV-1.1: Housing developed consistent with the Principles of Sustainable Community Development to meet local housing needs shall be encouraged.

Policy LUR-EGV-1.2: The County shall continue to ensure that a range of housing types is achieved in Eastern Goleta Valley that is sufficient to meet local housing needs.

Policy LUR-EGV-1.3: Residential second units, duplexes, and residential units in mixed use commercial development shall be encouraged as affordable housing types.

Policy LUR-EGV-1.4: Multifamily or mixed use development plans shall be designed to include a range of unit sizes and designs to maximize the affordability, flexibility, and appeal of the residential properties to meet local housing needs.

Policy LUR-EGV-1.5: In reviewing an affordable housing or bonus density residential project, the County shall consider the project's effects on the character of the existing neighborhoods but shall mitigate any significant impacts only in compliance with state law.

Policy LUR-EGV-2.1: The County-owned lands within the Urban Area should be considered as potential locations for affordable housing, prioritizing units that are affordable and attractive to low-income households.

Orcutt Community Plan

The Orcutt Community Plan identifies growth projections based on land use plans for housing, commercial and industrial space, roads, public facilities, and amenities for the community. Key policies related to population and housing include the following:

Policy LUR-O-1: Consistent with the Housing Element, the County shall encourage the provision of a mix of affordable units on parcels within the Orcutt Planning Area.

Policy LUR-O-3: The County shall encourage development of senior housing and shall work to preserve the existing senior housing stock.

Santa Ynez Valley Community Plan

The Santa Ynez Valley Community Plan includes goals, policies, development standards, and actions for the unincorporated communities of Los Olivos, Santa Ynez, and Ballard. Key policies related to population and housing include the following:

Policy LUT-SYV-1.1: Consistent with the Housing Element, the County shall encourage the provision of a mix of affordable units on parcels within the Santa Ynez Community Plan Area.

Policy LUT-SYV-1.2: The County shall encourage development of senior housing and shall work to preserve the existing senior housing stock.

Summerland Community Plan

Summerland's residential areas are located on the steep, ocean-facing hillside above the commercial strip and on small hills and canyons to the north of the town. Key policies related to population and housing include the following:

> **Policy H-S-2:** Consistent with Housing Element policies, the County shall actively encourage the provision of affordable housing in the community of Summerland, particularly secondary residential uses in the C-1 zone, a mix of affordable units on certain residential parcels and where individual applicants seek approval of such projects.

Regional Housing Needs Allocation (RHNA)

State HCD estimates the number of additional housing units needed to accommodate both existing and projected housing needs for all income levels. The purpose of the RHNA is to plan for population growth, so that the region and subregions will collectively produce sufficient housing to meet population needs and address social equity, with each jurisdiction providing its fair share of housing needs. The RHNA identifies the housing needs for very low-income, low-income, moderate-income, and above moderate-income groups (SBCAG 2021a). If a sites inventory demonstrates that there are insufficient sites to accommodate the RHNA for each income category, a jurisdiction must identify sites for rezoning to be included in a housing element program to identify and make available additional sites to accommodate those housing needs. Additional discussion on the RHNA process, as well as the County's RHNA, can be found in Chapter 2, *Project Description*.

Santa Barbara County Association of Governments (SBCAG) 2017-2050 Regional Growth Forecast

The purpose of the 2017-2050 Regional Growth Forecast is to provide consistent long-range population, job, and household forecasts for use in long range regional planning to the year 2050 for the unincorporated county, its major economic and demographic regions, and its eight incorporated cities. The Regional Growth Forecast is a requirement of the SBCAG Connected 2050 RTP/SCS. The forecast is adopted by the SBCAG board and used in a variety of applications, such as local General Plans, public service district forecasts, business development, transportation forecasts, and air quality planning. This forecast is based on the land use capacity of local general plans and takes input from all jurisdictions, the public, and the SBCAG Board of Supervisors. The forecast is updated periodically as new demographic data, land use policies, and changes in growth assumptions warrant.

Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

SBCAG's RTP/SCS is a report published every decade. The most recent version of the report is the Connected 2050 RTP/SCS. The Connected 2050 RTP/SCS provides a collective vision for the region's future that balances transportation and housing needs with social, economic, and environmental goals. The plan helps guide future planning efforts and policy decisions that affect transportation, including its relationship to housing and land use that will reduce GHG emissions in our region. The Connected 2050 RTP/SCS provides recommendations to help cities and the County make important decisions about transportation, housing, and land use. Connected 2050 provides forward-looking recommendations out to 2050 because many of our local government decisions will influence the region's long-term growth and development over the next 30 years. Fundamentally, this plan explores the region's land use and travel patterns, accounts for the demographic growth that will force new

demands on both, and presents a vision for how local jurisdictions can work together to satisfy the goals important to the region while also meeting the state's GHG reduction targets.

3.12.4 Environmental Impact Analysis

This section discusses the potential population and housing impacts associated with the Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed, where feasible, and the residual impact is determined.

3.12.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines Thresholds

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For this Program EIR, the proposed Project may have a significant adverse impact on population and housing if it would:

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure); or

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

County of Santa Barbara Environmental Thresholds and Guidelines

The County has not adopted thresholds relating to population and housing as part of the *Environmental Thresholds and Guidelines Manual* (2021). Instead, the County relies on analysis and consideration of impacts with regard to significance criteria based on CEQA Guidelines, as well as questions from the County's Initial Study Checklist. Note that the Initial Study Checklist does not specifically analyze population and housing as standalone resource areas, but the following thresholds from the Land Use Section are relevant:

Will the proposal result in:

a. The induction of substantial unplanned growth or concentration of population?

b. Loss of existing affordable dwellings through demolition, conversion, or removal?

c. Displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

d. Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. As a result, the impact analysis provided below does not evaluate potential impacts on population and housing at a project- or site-specific level. Rather, the Housing Element Update

establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 RHNA plus a 15 percent buffer for the lower- and moderate-income affordability levels. The programmatic analysis provided by this Program EIR addresses the potential for the Housing Element Update as a whole to affect population and housing growth within the county, specifically relating to the higher total maximum buildout associated with Program 1 of the Housing Element Update, which includes a requirement to adopt a Potential Rezone Program to address the shortfall of sites needed to meet the RHNA plus the 15 percent buffer for lower- and moderate-income units. The sites inventory indicates where potential housing sites may occur under the proposed Project and informs this environmental impact analysis. Wherever possible, illustrative examples are provided to describe particular areas of the county where the implementation of the Housing Element Update would exacerbate growth or impacts on existing populations (e.g., a non-vacant site identified for potential rezoning which might displace or adversely affect existing residents).

This programmatic analysis reviews potential future development anticipated to be enabled by the Housing Element Update and considers whether these changes would result in substantial population, household, and employment growth, particularly in relation to anticipated regional projections from the SBCAG Regional Growth Forecast. To calculate potential population increases based on the maximum potential additional housing units under the proposed Project, the current (i.e., 2017-2021) countywide average household size of 2.89 persons per household is used (U.S. Census Bureau 2021). The Program EIR also considers the potential for changes in population to result in the displacement of existing housing or residents based on the sites inventory prepared by the County as part of the Housing Element Update.

As required by the CEQA Guidelines, the Program EIR must include a discussion of how the proposed Project could directly or indirectly foster economic development, population growth, or the construction of additional housing and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). Growth can be induced in several ways, including the elimination of obstacles to growth. In general, a project may foster substantial growth in a geographic area if it meets any one of the criteria identified below:

- The project removes an impediment to growth (e.g., the provision of new roads or utilities to an area that would otherwise be unreachable or unserviceable);
- The project results in the urbanization of land in a remote location (urban sprawl);
- The project establishes a precedent-setting action that would significantly intensify growth in an otherwise undeveloped area (e.g., a change in zoning or general plan amendment approval for agricultural land to urban development); or
- Significant economic expansion or growth occurs in an area in response to the project (e.g., the establishment of employment centers,).

Generally, growth-inducing projects are either located in isolated, undeveloped, agricultural, or rural areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways or involve actions that permit or foster premature or unplanned growth.

As previously described, population growth in and of itself does not constitute a physical impact on the environment, which is of concern under CEQA. Rather, it is how that growth may generate physical environmental impacts, such as increased demands for public services, surpassing of infrastructure capacities, or increased traffic congestion and resulting criteria air pollutant and GHG emissions. The environmental impacts of anticipated population and housing growth on other issues, such as public services, utilities, transportation, air quality, GHG emissions, and other issues are addressed

throughout respective sections of this Program EIR. (See Sections 3.3, *Air Quality,* 3.7, *Greenhouse Gas Emissions,* 3.13, *Public Services and Recreation,* 3.14, *Transportation,* and 3.15, *Utilities and Water Supply.*)

The information and analysis presented in this section is based on U.S. Census Bureau, DOF, and SBCAG data. Where available, data on existing population, employment, and housing trends within select regions of the county are provided along with a discussion of possible changes in trends and growth forecasts under the proposed Project. Information in previous long-range planning documents, EIRs prepared by the County, and associated technical studies was also considered. These include the Santa Barbara County Comprehensive Plan (particularly the 2015-2023 Housing Element Update) and the associated community plans.

3.12.4.2 Project Impacts

Table 3.12-12 below provides a summary of the population and housing impacts resulting from the proposed Project. A detailed discussion of each impact follows.

Table 3.12-12. Summary of Population and Housing Impacts

Population and Housing Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact PH-1. The Project would potentially induce substantial unplanned population growth within the county.	Potentially significant	No mitigation feasible	Significant and unavoidable
Impact PH-2. The Project would not displace substantial numbers of existing people or housing.	Insignificant	None required	Insignificant
Cumulative Impacts	Potentially significant	No mitigation feasible	Significant and unavoidable

Impact PH-1. The proposed Project would potentially induce unplanned population growth within the county.

As described in Chapter 2, *Project Description,* the Housing Element Update is a state-mandated component of the County's Comprehensive Plan. The current update is for the 8-year 2023-2031 planning period. The Housing Element Update identifies goals, policies, and programs to help meet existing and projected housing needs for all residents of the unincorporated county, including various household types, special needs groups, and lower-income households. One important step in the update process is to identify and, if necessary, rezone sites to accommodate the County's 2023-2031 regional housing needs allocation (RHNA), which is divided into four income levels (i.e., very low, low, moderate, and above-moderate). A sites inventory shows that the County lacks sufficient sites under current zoning to meet its RHNA for the lower and moderate-income levels. As a result, County staff identified more potential County-owned sites and potential vacant and non-vacant sites to be rezoned than necessary to meet the RHNA plus a 15 percent buffer for the lower and moderate-income units. The County Board of Supervisors will select a combination of these sites as part of Program 1 of the Housing Element Update (Potential Rezone Program) to meet the RHNA plus the 15 percent buffer. Since it is unforeseeable precisely where the potential County-owned sites and potential rezone sites would occur or how much housing capacity would be created through the implementation of Program 1 to meet the RHNA plus the 15 percent buffer, this analysis considers all potential housing sites in

the sites inventory, all potential County-owned sites, and all potential rezone sites to calculate and disclose the maximum potential housing and population enabled under the proposed Project.

As described in Chapter 3, *Environmental Impact Analysis*, the proposed Project would allow for a maximum potential buildout of 34,558 new residential units if all housing sites are developed to their maximum potential buildout under the County's existing or future zoning for each site. This is a theoretical maximum for the purposes of the Program EIR. Based on the average household size in the county (2.89 persons per household), the proposed Project would have the potential to increase the population in unincorporated Santa Barbara County by an estimated 99,873 persons (Table 3.12-13).

The proposed Project would result in substantial population growth that exceeds current population growth projections for Santa Barbara County. Using SBCAG's 2020 population estimate for the unincorporated county as a baseline (Table 3.12-3), the proposed Project would increase the total population of the unincorporated county from 143,000 up to 242,873 persons by 2031, representing an increase of approximately 69.8 percent over the 8-year planning period for the proposed Project (SBCAG 2021b). Assuming a consistent rate of annual population growth over the 8-year planning period, the proposed Project would result in an average annual population growth rate of 8.7 percent (Table 3.12-14). Comparatively, the growth forecasts provided in the Connected 2050 RTP/SCS identify a projected increase in the unincorporated county population of only 5,800 persons by 2035, representing a total growth rate of only 4.2 percent, or an average annual growth of only 0.3 percent. As SBCAG's Regional Growth Forecast and Connected 2050 RTP/SCS are informed by existing land use plans for agencies within the county, these projections do not account for the effect of the proposed Project, which would involve changes to land use and zoning in the unincorporated county to accommodate the 2023-2031 RHNA plus a 15 percent buffer for lower- and moderate-income affordability levels.

Similarly, the proposed Project would result in substantial housing growth that exceeds current housing growth projections for Santa Barbara County. Using SBCAG's 2020 housing stock estimate for the unincorporated county as a baseline (Table 3.12-3), the proposed Project's potential increase in housing units of 34,558 would increase the total housing stock of the unincorporated county from 46,900 units to an estimated 81,458 units by 2031, representing an increase of approximately 73.7 percent over the 8-year planning period under the proposed Project. Assuming a consistent rate of annual housing development, the proposed Project would result in an average annual housing growth rate of 9.2 percent (Table 3.12-14). Comparatively, the housing growth forecast provided in the Connected 2050 RTP/SCS identify a projected increase in the unincorporated county housing stock of only 4,100 units by 2035, representing a total growth rate of only 8.7 percent, or an average annual growth of only 0.6 percent. As SBCAG's Regional Growth Forecast and Connected 2050 RTP/SCS are informed by existing land use plans for agencies within the county, these projections do not account for the effect of the proposed Project, which would involve changes to land use and zoning in the unincorporated county to accommodate the 2023-2031 RHNA plus a 15 percent buffer for lower- and moderate-income affordability levels.

Table 3.12-13. Estimated Population Growth under the Proposed Project by HMA and Site Type

Housing Site Type	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Existing Vacant Sites	1,526	413	8,456	1,572	--
Rezones	46,535	1,237	28,643	881	5,237
County-owned Sites	925	--	--	--	--
Pending Projects	3,156	1,012	--	176	95
Total	52,141	2,662	37,108	2,630	5,332
Total by RHNA Region	52,141	47,731			
Total Unincorporated County	99,873				

Note: Numbers are rounded independently. Data is represented in number of persons.

Table 3.12-14. Total Estimated Increase in Population and Housing Units under the Proposed Project

Jurisdiction	Average Persons per Housing Unit	Proposed Estimated Increase in Housing Units	Estimated Project Population Increase	2020 SBCAG Population + Project Population Increase	SBCAG Forecasted Population by 2035	2020 SBCAG Housing Units + Project Housing Units	SBCAG Forecasted Housing Units by 2035
Unincorporated Santa Barbara County	2.89	34,558	99,873	242,073	149,000	84,958	51,000

Based on this analysis, the projected increases in housing development and associated population growth would be substantially greater than the projections anticipated in the Connected 2050 RTP/SCS and Regional Growth Forecast. However, it is important to note that the SBCAG's 2017-2050 Regional Growth Forecast, from which the Connected 2050 RTP/SCS is developed, is several years old and, therefore, does not factor in more recent population and housing trends, nor does it respond to or reflect land use or zoning changes currently identified in the Housing Element Update, which could substantially increase the capacity of existing communities to accommodate housing. Although the proposed Project is noticeably inconsistent with projections in the Connected 2050 RTP/SCS, the goal of the proposed Project and its housing programs are to meet the housing needs in the unincorporated county, including through potential land use and zoning changes as needed to meet the County's RHNA plus a 15 percent buffer for lower- and moderate-income households, as defined by SBCAG.

Additionally, the maximum buildout scenario and population projections of the proposed Project represent a highly conservative, worst-case scenario for the purposes of analysis in this Program EIR. The projected increase in population conservatively assumes future residents of housing projects enabled by the Housing Element Update would consist of all new residents to the county. In reality, it is likely that a portion of future residents would consist of existing residents of the unincorporated communities and incorporated cities, especially because the RHNA is intended to help meet the existing housing needs of the county. Further, and perhaps more importantly, Program 1 of the Housing Element Update (Potential Rezone Program) identifies more sites than necessary to meet the RHNA plus the 15 percent buffer for lower- and moderate-income units and affordability goals of the Housing Element Update. This is intended to provide the opportunity for public feedback and decision-maker choice in selecting sites as part of the proposed Project. As part of Program 1,

decision-makers (i.e., Board of Supervisors) will have the authority to select the specific housing sites necessary to accommodate the RHNA plus a 15 percent buffer for lower- and moderate-income households. Because the results of this future rezone site selection/elimination process are not foreseeable, this Program EIR analyzes the programmatic impacts of all potential rezone sites, as well as other site types, to disclose the reasonable worst-case analysis of potential impacts from the whole of the proposed Project. As a result, the maximum potential buildout scenario estimates that substantially more housing could be developed under the proposed Project than estimated potential housing sites in the sites inventory, and the actual number of units resulting from the proposed Project will likely be much closer to the RHNA.

It is also important to consider the jobs/housing imbalance that is currently prevalent in the county and the beneficial impact the Project would have in this regard. As discussed in the Connected 2050 RTP/SCS, the South Coast is jobs-rich and housing-poor; this region's diverse mix of employment opportunities, coupled with an expensive housing market, drives workers to seek more affordable housing in areas, such as the Lompoc Valley and Santa Maria Valley, as well as in adjacent counties. In the past 20 years, the number of workers commuting into the county has been steadily increasing, as has the number of workers making a longer commute within the county. These longer commutes increase VMT, energy use, air pollutant emissions, and GHG emissions and come with associated environmental impacts. The production of new affordable housing, especially for areas in the South Coast where jobs are highly concentrated, could potentially reduce the environmental impacts associated with long-distance commutes, particularly relating to VMT, which would help to meet the overarching goals of the Connected 2050 RTP/SCS. Refer to Section 3.10, *Land Use and Planning* for a detailed discussion of the potential consistency of the proposed Project with the goals and policies of applicable plans and programs, including the Connected 2050 RTP/SCS. See Section 3.14, *Transportation* for detail analysis of VMT associated with the proposed Project.

Regardless, due to the significant increase in future housing units enabled by the Housing Element Update and, consequently, the additional population that could result from the proposed Project, the proposed Project creates the potential for substantial unplanned population growth, and as a result, would cause a *potentially significant* impact.

The only way to fully avoid impacts associated with the potential future development enabled by the Housing Element Update causing housing and population growth that would be inconsistent with regional projections would be to eliminate sites from consideration as part of the proposed Project, particularly sites identified as part of the Potential Rezone Program (Program 1 of the Housing Element Update), thereby eliminating potential housing sites from future development of housing and new population. However, doing so would substantially reduce the flexibility for County decision-makers to meet the County's RHNA plus the 15 percent buffer for lower- and moderate- income housing units and specific affordability targets, and such mitigation is considered infeasible. Therefore, impacts would be *significant and unavoidable.*

Impact PH-2. The proposed Project would not displace substantial numbers of people and housing.

To demonstrate the County's ability to meet the RHNA plus the 15 percent buffer for lower- and moderate-income units, the Housing Element Update identifies all potential housing sites in the sites inventory [i.e., existing vacant sites, pending projects, Accessory Dwelling Unit projections (ADUs)], potential County-owned sites, and potential rezone sites that could be developed with additional

housing.[1] Most of the sites in the Potential Rezone Program are currently zoned either Agriculture or Commercial, and many of these sites are currently vacant. However, four potential rezone sites (Rezone Site Nos. 10 [McCloskey Lelande], 17 [Montessori], 25 [Mariposa Real], and 29 [Hummel Cottages]) and four pending project sites (Bailard, Price Ranch, 4555 Hollister Apartments, and Hillside House) currently support existing residential development. Given the Housing Element Update is a planning document and does not directly propose or provide details surrounding the future development of housing sites, some future residential development projects enabled under the Housing Element Update may result in the demolition of existing residential units to develop new housing units at an increased density. Given the 48 units of existing residential development on the four rezone sites and the 22 existing residential units on the four pending project sites, a total of 70 housing units would have the potential to be displaced under the proposed Project. Applying an average household size of 2.89, this could result in a maximum of 202 people being displaced from their current housing. However, this amounts to less than 0.2 percent of the maximum total population that could be introduced as a result of additional housing units under the proposed Project.

While the Housing Element Update could result in the displacement of existing residents, the overarching goal of the proposed Project as a whole is to encourage and promote the development of housing across all levels of affordability to meet future housing needs in the county. The Housing Element Update would result in a significant net increase in housing units across all affordability levels. Further, the proposed Project includes programs that aim to protect and expand the housing stock in the county. Some of these programs are specifically designed to protect existing housing. Specifically, Program 3 of the Housing Element Update (Replacement Housing), would update the County's zoning ordinances to include unit replacement requirements for development on all non-vacant sites that contain existing residential units or units that were rented in the past five years and occupied by low- or very low-income households. Additionally, Program 18 of the Housing Element Update (Preservation of Affordable Housing at Risk of Conversion to Market Rate and Mobile Home Parks) would preserve 100 percent of affordable units at risk of conversion to market-rate units during the planning period through funding support and outreach. Further, existing regulations such as Section 3007 of the California Coastal Act would protect against potential displacement of housing, specifically affordable housing.

Additionally, as described in Impact PH-1, Program 1 of the Housing Element Update (Potential Rezone Program) identifies more sites than necessary to provide the opportunity for public feedback and decision-maker choice in selecting sites as part of the proposed Project; decision-makers will have the authority to select only the number of housing sites necessary to accommodate the RHNA plus a 15 percent buffer for lower- and moderate-income households. As a result, some housing sites would likely be eliminated from the Potential Rezone Program. Further, even if a non-vacant site were selected as part of the Program 1, various factors influence whether a project applicant would propose to demolish existing residences and redevelop an entire site or propose to develop only the existing undeveloped portions of a site, leaving existing units intact. Such factors include owner interest/intent, market conditions, tenancy lease terms, building conditions, and rent levels. Therefore, there is a possibility that existing units on selected sites would be preserved, and that higher density development on a site's remaining acreage would be proposed to meet density requirements. Lastly, if a housing site project proposal includes demolition of existing housing units, displacement impacts would be evaluated on a project-by-project basis, consistent with the programs

[1] While ADUs are expected to contribute to meeting the County's RHNA, it should be noted that ADUs are exempt from CEQA and discretionary permits pursuant to Government Code Sections 65852.2 and 65852.22.

in the Housing Element Update, and may include a relocation analysis and plan in accordance with existing state and local requirements.

Since the sites inventory, potential County-owned sites, and potential rezone sites primarily identify parcels that do not have existing residential uses, it is not anticipated that substantial numbers of existing housing or people would be displaced. In addition, programs in the Housing Element Update (Programs 3 and 18), approach to site selection (Program 1), and regulations such as Section 3007 of the California Coastal Act would protect against potential displacement of housing, specifically affordable housing. Therefore, the proposed Project would not displace substantial numbers of people and housing, and impacts relating to the displacement of people or housing would be *insignificant.*

3.12.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of long-range plans, policies, and initiatives as well as development projects (housing and non-housing related) in the unincorporated county and surrounding incorporated cities. Project impacts along with potential impacts from past, pending, and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects, such as the Accessory Dwelling Unit (ADU) Ordinance Amendments (Cumulative Project No. 13) to incorporated cities in Santa Barbara County's 2023-2031 Housing Element Update (Cumulative Project No. 1 – 8) (Table 3-6).

The proposed Project would result in cumulatively considerable impacts if it, in combination with other cumulative past, pending, and current plans and projects, would result in significant unplanned population growth or displace a substantial amount of people and housing. Included in the cumulative setting for the proposed Project is the housing element updates for each of the eight incorporated cities within the county. Under each of these cumulative projects, each agency is planning for how to meet local housing needs and the RHNA assigned by SBCAG by identifying potential sites for new housing development, potential sites for rezoning to residential uses, as necessary, and implementing a variety of programs that would encourage or facilitate new residential development. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units. Other cumulative planning efforts are listed in Section 3.0.6, *Cumulative Impact Analyses* (Tables 3-6, 3-7, and 3-8; Appendix I).

Similar to the proposed Project, the Regional Growth Forecast does not reflect the RHNA allocations for the cities and the County, and, likely, the cumulative effects of the implementation of all housing element update projects in the county would greatly exceed SBCAG's regional growth projections, resulting in a cumulatively significant impact. The maximum potential buildout of 34,558 new residential units and the associated potential increase in population of up to 99,873 residents under the proposed Project would represent a substantial share of the unplanned growth in the county, and the proposed Project's contribution to this cumulatively significant impact would be cumulatively considerable and *potentially significant*. As described in Impact PH-1, no feasible mitigation exists which could reduce the proposed Project's contribution to this cumulatively significant impact, and impacts relating to population growth are considered *significant and unavoidable.*

With respect to the potential for cumulative development to displace existing populations, many of the cumulative projects considered in this analysis involve various plans and programs which would not have the potential to cause significant cumulative impacts. Further, many cumulative development projects consist of the development of existing vacant sites that would not have the potential to displace existing housing or populations. Individually, each of these cumulative projects

would be subject to project-specific review and approval. However, much like the proposed Project, the housing element updates of each of the incorporated cities may identify, and potentially enable redevelopment of, sites that are currently developed with existing housing. The proposed Project, when considered alongside cumulative projects in the county, could potentially contribute to cumulative impacts related to the displacement of people and housing. However, existing programs in the Housing Element Update (Programs 3 and 18), approach to site selection, and regulations such as Section 3007 of the California Coastal Act would protect against potential displacement of housing, specifically affordable housing. Therefore, the Project's contribution to the potential displacement of people or housing would not be cumulatively considerable, and cumulative impacts relating to displacement would be *insignificant*.

3.12.4.4 Proposed Mitigation

No mitigation measures are feasible.

3.12.4.5 Secondary Impacts

No mitigation measures are feasible to reduce Project impacts. Therefore, no direct secondary impacts would occur.

3.12.4.6 Residual Impacts

Impact PH-1. Potential development resulting from the proposed Project would greatly exceed the population and housing projections for the unincorporated county. Due to the nature of the proposed Project, no feasible mitigation measure exists which could reduce impacts relating to unplanned population and housing growth, impacts remain *significant and unavoidable*.

Impact PH-2. Since the sites inventory primarily identifies parcels that do not have existing residential uses, it is not anticipated that substantial numbers of existing housing or people would be displaced. In addition, existing programs in the Housing Element Update (i.e., Programs 3 and 18) and regulations, such as Section 3007 of the California Coastal Act, would protect against potential displacement of affordable housing. Therefore, impacts relating to the displacement of people or housing would remain *insignificant.*

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Section 3.13
Public Services and Recreation

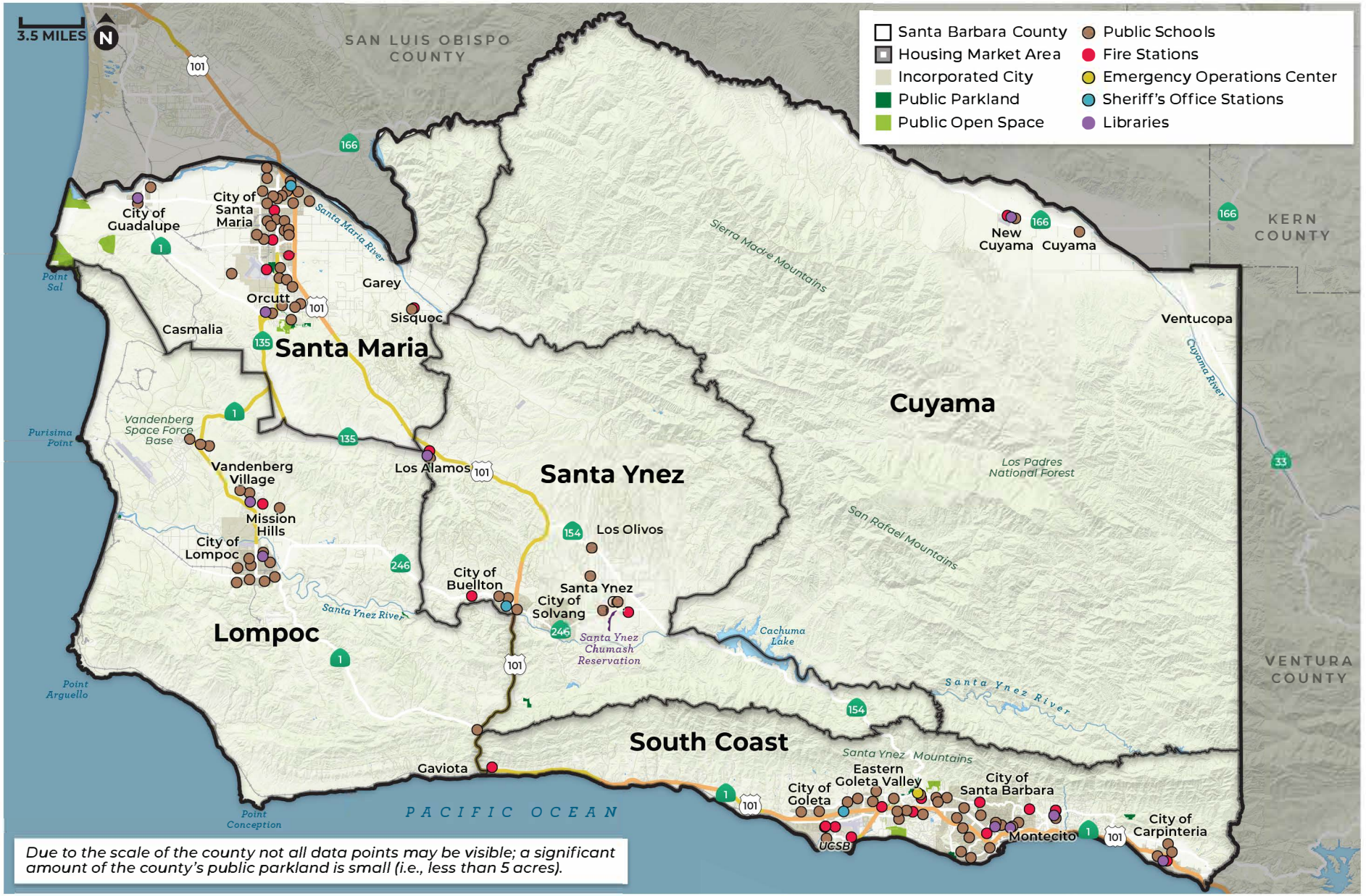
3.13.1 Introduction

This section describes potential impacts on public services and recreation that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). Public services analyzed in this section include fire protection, law enforcement and police protection, public schools, and libraries. Additionally, this section considers the availability and adequacy of public parks and recreation facilities that serve the unincorporated areas of the county.

Section 3.15, *Utilities and Water Supply* provides information regarding public utilities, including water, wastewater, and solid waste management. Section 3.6, *Energy* provides information regarding electricity and natural gas utilities. Section 3.14, *Transportation* provides information regarding public transportation services. For information about wildland fires, response capabilities, and wildfire fighting strategies, see Section 3.16, *Wildfire*. For analysis of potential air quality impacts on sensitive receptors associated with public service facilities (e.g., schools), refer to Section 3.3, *Air Quality*.

3.13.2 Environmental Setting

State and local government entities provide a wide range of public services to the residents of the county related to public health and safety, educational institutions, and parks and recreational facilities, as summarized in Table 3.13-1 and described in further detail below. Figure 3.13-1 depicts the location of various public facilities within the county that provide services to unincorporated communities.



Santa Barbara County Public Services and Recreation

FIGURE 3.13.-1

Table 3.13-1. Summary of Public Service Providers in the Unincorporated County

Public Service	Provider
Fire Protection	• Santa Barbara County Fire Department (SBCFD)
Law Enforcement and Police Protection	• Santa Barbara County Sheriff's Office • California Highway Patrol (CHP)
Public Schools	• Ballard School District • Blochman Union School District • Buellton Union School District • Carpinteria Unified School District • Cold Spring School District • College School District • Cuyama Joint Unified School District • Goleta Union School District • Guadalupe Union School District • Hope School District • Lompoc Unified School District • Los Olivos School District • Montecito Union School District • Orcutt Union School District • Santa Barbara Unified School District • Santa Maria Joint Union High School District • Santa Maria-Bonita School District • Santa Ynez Valley Union High School District • Solvang School District • Vista Del Mar Union School District
Libraries	• Santa Maria Public Library System • Lompoc Public Library System • Carpinteria Community Library • Goleta Valley Library System • Santa Ynez Valley Library System
Parks	• County Community Services Department, Parks Division • Isla Vista Recreation and Parks District (IVRPD) • Cuyama Valley Recreation District (CVRD)

3.13.2.1 Public Services

Fire Protection

Santa Barbara County Fire Department

The Santa Barbara County Fire Department (SBCFD) provides fire prevention, fire suppression, and paramedic services covering an area of 2,774 square miles throughout the county, including unincorporated urban communities such as Eastern Goleta Valley, Orcutt, Santa Ynez, Vandenberg Village, Mission Hills, and New Cuyama, as well as some rural areas. (See Section 3.16, *Wildfire* for additional information about rural and wildland fire protection services.) SBCFD serves approximately 174,268 residents within its service area. SBCFD is an "all-risk" organization providing services that range from firefighting, fire



Fire Station No. 13 in Eastern Goleta Valley serves the area from Los Padres National Forest (LPNF) to the Pacific Ocean, including some portions of the City of Santa Barbara, and maintains average response times of about 10 minutes.
Source: SBCFD

prevention and inspection, and rescue to emergency medical care, transportation, and hazardous material and oil spill response and containment. SBCFD is also one of six "contract counties" under contract with the California Department of Forestry and Fire Protection (CAL FIRE) with the state. As a contract county, SBCFD assumes responsibility for fire prevention and protection over the 670,677 acres of State Responsibility Area (SRA) in the county. In return for this service, CAL FIRE provides funding for services, including wages of suppression crews, maintenance of firefighting facilities, fire prevention assistance, pre-fire management positions, dispatch, capital improvements, and administrative services. SBCFD's budget also provides for expanded firefighting needs when fires grow beyond the initial attack (SBCFD 2023a).

Fire Stations, Staffing, and Equipment

With approximately 245 field personnel and 32 support staff members divided across 16 fire stations (Table 3.13-2), SBCFD responds to over 15,000 incidents each year, including structure, wildland, vehicle, and other types of fires (SBCFD 2022a). Each fire station is staffed 24 hours per day with a minimum of three firefighters and a Type I (structure) engine. Specialized equipment, such as Type III (wildland) fire engines, water tenders, paramedic rescue ambulances, technical rescue, and water rescue equipment are strategically placed throughout the county and are cross-staffed with existing engine personnel. Details regarding the location, service area, and apparatus and staffing for SBCFD fire stations are provided in Table 3.13-2 and Figure 3.13-1. Consistent with the County Fire Protection Standards, SBCFD targets a firefighter-to-population ratio of one firefighter on duty for every 2,000 persons in the service area. One firefighter per 4,000 persons (including urban and rural area populations) is the maximum ratio that SBCFD has determined that can adequately serve the public. Additionally, a ratio of one engine company per 16,000 persons represents the maximum population that SBCFD has determined can be adequately served by a four-person crew. With a service area population of approximately 174,268 persons, and 245 field personnel spread across 16 fire stations (and a total of 18 engine/truck companies), the current firefighter-to-population ratio is one firefighter for approximately every 711 persons, and one engine company for every 9,682 persons.

Table 3.13-2. Santa Barbara County Fire Department Stations

Station No.	Address	Location (HMA and City/Community)	Service Area	Apparatus & Staffing[1]
10	7952 Hollister Avenue (Planned)	South Coast City of Goleta	Western portions of the City of Goleta and the unincorporated areas of the county north and west of the City of Goleta	This new fire station is planned, but not yet built. The facility is planned as an 11,600-square-foot, single-story station with three drive bays for fire trucks and associated apparatus. Three firefighters would be on duty at all times.
11	6901 Frey Way	South Coast City of Goleta	The City of Goleta west of Los Carneros Road and north of El Colegio Road and the unincorporated areas of the county north and west of the City of Goleta	Two Captains, two Engineers, and two Firefighters Urban Search and Rescue (USAR) Team Members Ladder Truck 11 Engine 11 Rescue Watercraft USAR Vehicle
12	5330 Calle Real	South Coast City of Goleta	The area bordered by Fairview Avenue, Fowler Road, Cathedral Oaks Road, and San Marcos Pass Road from Calle Real North to Via Los Santos	One Captain, one Engineer, and one Firefighter Advanced Life Support (ALS) capable when paramedic on-duty (through use of extension kits)
13	4570 Hollister Avenue	South Coast Eastern Goleta Valley	Areas of Goleta and unincorporated areas (Eastern Goleta Valley) west of the City of Santa Barbara; bordered to the north by areas of Los Padres National Forest (LPNF), to the south by the Pacific Ocean, to the east by the County-City borders, and to the west roughly by Maria Ignacio Creek in the south and San Antonio Creek towards the north	One Captain, one Engineer, and one Firefighter ALS capable when paramedic on-duty (through the use of extension kits) Utility Type 1 Reserve
14	320 Los Carneros Road	South Coast City of Goleta	The area south of LPNF, north of Hollister Avenue, east of Glen Annie Road, and west of Fairview Avenue	One Captain, one Engineer, and one Firefighter ALS Paramedic-Staffed Station

Table 3.13-2. Santa Barbara County Fire Department Stations (Continued)

Station No.	Address	Location (HMA and City/Community)	Service Area	Apparatus & Staffing[1]
15	2491 Foothill Road	South Coast City of Santa Barbara	The unincorporated areas north of the City of Santa Barbara, extending into LPNF in the north, towards the south, and east up to the City/County borders. In the west, it is bordered north of Foothill Road by Antone Road and Debra Drive and south of Foothill Road by Alamar Avenue.	One Captain, one Engineer, and one Firefighter ALS capable when paramedic on-duty (through the use of extension kits)
17	University of California, Santa Barbara (UCSB), Mesa Road Bldg. 547	South Coast UCSB	The UCSB campus and areas of Isla Vista and the City of Goleta; bounded to the north by Hollister Avenue, to the south by the Pacific Ocean, to the east by Goleta Beach Park, and to the west by Camino Del Sur	One Captain, one Engineer, two Firefighters/Paramedics, and one Firefighter Water Rescue Team Engine 17 Water Rescue Vehicle ALS Paramedic-Staffed Station
38	17200 Calle Mariposa Reina Road	South Coast Gaviota	The area bounded by the Pacific Ocean to both the south and west. The northern boundary is roughly a line running from Jalama Beach, east through the Nojoqui Summit ending at their eastern boundary which is determined by a line running due north from El Capitan State Beach Park	One Captain, one Engineer, and one Firefighter Support Water Tender Light & Air Unit
21	335 Union Avenue	Santa Maria Orcutt	The Orcutt and Santa Maria Valley areas including the communities of Tanglewood and Casmalia. Also responds north and west to portions of State Routes (SRs) 1 and 135 up to the city limits of Santa Maria and Guadalupe. and southward to SR 1 near San Antonio Road and SR 135 at Harris Grade Road.	One Captain, one Engineer, one Firefighter, and one Firefighter/Paramedic
25	E. Union Valley Parkway (Planned)	Santa Maria Orcutt	The unincorporated community of Orcutt.	This new fire station is planned, but not yet built.

Table 3.13-2. Santa Barbara County Fire Department Stations (Continued)

Station No.	Address	Location (HMA and City/Community)	Service Area	Apparatus & Staffing[1]
26	1596 Tiffany Park Court	Santa Maria Orcutt	The Orcutt and Santa Maria Valleys. Bounded by the Solomon Grade to the south, Santa Maria Way to the north, Bradley Road to the west, and Dominion Road to the east.	One Captain, one Engineer, one Firefighter, and one Firefighter/Paramedic Tactical Water Tender Utility
23	5003 Depot Street	Santa Maria Sisquoc	The Sisquoc region. Bounded by Tepesquet Canyon to the north, by U.S. Highway 101 and Aliso Canyon Road to the south, by Foxen Canyon and Rancho Sisquoc to the east, and by Dominion Road to the west.	One Captain, one Engineer, and one Firefighter (one of these will also be a Paramedic) ALS Paramedic-Staffed Station
24	99 Centennial Street	Santa Ynez Los Alamos	The Los Alamos area roughly bordered in the north by the Solomon Grade (on U.S. Highway 101) or the 9000 block of Foxen Canyon Road. In the South, it extends to an area just North of SR 154. In the East, it goes out to Zaca Lake and in the West, it extends to San Antonio Road and SR 135	One Captain, one Engineer, and one Firefighter/Paramedic Utility Type 1 Reserve Location of Battalion 2 Office/Quarters and SBCFD Construction Section ALS Paramedic-Staffed Station
30	1644 Oak Street	Santa Ynez City of Solvang	The City of Solvang and portions of the unincorporated Santa Ynez Valley, including the town of Ballard.	One Captain, one Engineer, one Firefighter, and one Firefighter/Paramedic Utility Type 1 Reserve ALS Paramedic-Staffed Station
31	168 West Highway 246	Santa Ynez City of Buellton	Northern boundary: approximately 2 miles north of SR 154/ U.S. Highway 101 interchange; the southern boundary is the top of the Nojoqui Grade; extends eastward until Solvang city limit, and westward to the intersection of SR 246 and Campbell Road	One Captain, one Engineer, one Firefighter, and one Firefighter/Paramedic Hazardous Materials (Haz-Mat) Response Team Haz-Mat Vehicle Home to Battalion 3 Quarters ALS Paramedic-Staffed Station

Table 3.13-2. Santa Barbara County Fire Department Stations (Continued)

Station No.	Address	Location (HMA and City/Community)	Service Area	Apparatus & Staffing[1]
32	906 Airport Road	Santa Ynez Santa Ynez	The area bounded to the north by the LPNF boundary, to the south by the ridge of the Santa Ynez Mountains, to the east by Paradise Road, and to the west by Alamo Pintado Road along Solvang city limits	One Captain, one Engineer, and two Firefighters/Paramedics Utility Water Tender Helicopter access ALS Paramedic-Staffed Station
34	3510 Harris Grade Road	Lompoc Mission Hills	The area bounded to the north by SR 1 at San Antonio Creek, to the south at the Las Cruces Grade on SR 1, to the east by Drum Canyon at SR 246, and to the west by the Pacific Ocean	One Captain, two Engineers, and two Firefighters/Paramedics Paramedic Engine Company Rescue Ambulance Type 1 Reserve Engine ALS Paramedic-Staffed Station
27	41 Newsome Street	Cuyama New Cuyama	The Cuyama Valley, the town of New Cuyama, and surrounding areas. The northern boundary extends to portions of San Luis Obispo County and the Caliente Mountains, in the South to the Sierra Madre, west on SR 166 to the Rockfront Ranch, and east to SR 33.	One Captain, one Engineer, one Firefighter, and one Firefighter/Paramedic Rescue Ambulance Water Tender Utility

Notes:
[1] In addition to staff and apparatus listed, all stations include both Type 1 and 3 Engines.
Source: SBCFD 2022b.

In 2020, SBCFD retained Citygate Associates, LLC (Citygate) to conduct an operational enhancement update to the 2012 fire services deployment and departmental performance audit. This study evaluated the organization and deployment of fire suppression and Emergency Medical Services (EMS) operations. Citygate found that SBCFD's response apparatus (i.e., equipment) was appropriate to protect against the hazards likely to impact the fire service areas. Additionally, Citygate found the daily staffing per unit provides Effective Response Forces (ERFs) sufficient for one to three emerging or serious fires while maintaining other single-unit emergency responses. In terms of emergency incident workload per unit, no single fire unit or station area is approaching workload saturation (Citygate 2020).

According to the County's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), 10 of the 16 County fire stations are more than 50 years old and three are more than 60 years old. The typical life of a fire station is 40 years. Recent studies conducted by contracted outside agencies have identified the need for SBCFD to replace 10 aging fire stations (County of Santa Barbara 2022b). The County is actively seeking funding to repair or replace up to 10 county fire stations to provide adequate fire response services and equipment and equitable access to fire services countywide. In addition, the County is

currently in the process of either planning for or acquiring funding for the construction of two new fire stations – Fire Station No. 10 in the City of Goleta to serve the western portions of the city and unincorporated county areas to the north and west, and Fire Station No. 25 in Orcutt. It is currently uncertain when Fire Station No. 10 will be constructed and become operational. Fire Station No. 25 in its design phase and is tentatively anticipated to be completed in 2025 (personal communication with Division Chief, Robert Hazard 2023).

Response Times and Services

In 2022, SBCFD responded to approximately 11,501 incidents, including 348 fire incidents, 9,503 emergency medical incidents, and 1,650 other incidents (i.e., alarms, mutual aid, hazardous materials response, and miscellaneous). The total number of incidents responded to in 2022 was less than the previous five years, which averaged a total of 14,196 incidents based on available data (SBCFD 2023b).

The adequacy of fire protection services can be informed by the average response times to incidents. Total response time to emergency incidents includes three separate components: 1) 9-1-1 call processing/dispatch time; 2) crew turnout time[1]; and 3) travel time. According to the National Fire Protection Association (NFPA) Code 1710 (Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Services [EMS], and Special Operations to the Public by Career Fire Departments), dispatch time for fire suppression, medical response, and special operations should be less than or equal to 60 seconds 90 percent of the time. Turnout time should be 60 seconds for EMS responses and 80 seconds for fire responses. The NFPA also requires fire stations to establish an objective of 240 seconds (i.e., 4:00 minutes) or less of travel time for the first arriving engine company at a fire suppression incident or the first responder with an automatic defibrillator or higher-level capacity at an emergency medical incident. The NFPA standards require that these objectives be met for at least 90 percent of incidents. The most recently released 2020 NFPA standards were also revised to include a requirement for fire stations to establish an objective of a second properly staffed four-person unit to arrive within 360 seconds (i.e., 6:00 minutes) or less (NFPA 2020). The goal response time under NFPA standards is 7:30 minutes from 9-1-1 notification to arrival of initial units and 11:30 minutes for multiple-unit ERF for 90 percent of emergency calls. In particular, SBCFD's response performance goals are based on recommended best practices for first-due and multiple-unit ERF responses, which consist of 1:30 minutes for dispatch time, 2:00 minutes for turnout, and 4:00 minutes (initial units) to 8:00 minutes (multiple-unit ERF) for travel time.

Based on the most recently available 2019 data provided in the Citygate study, SBCFD's fire crew turnout and fire unit travel times are longer than the best practices recommendations. In total, SBCFD's total response time from 9-1-1 being answered is 2:22 minutes longer than best practices (Citygate 2020).

[1] NFPA Standard 1710 defines turnout time as the time beginning when units acknowledge notification of the emergency to the time point of beginning the response.

Table 3.13-3. 90th Percentile First Unit Call-to-Arrival Performance

Station No.	Response Time (2019)
District Wide	9:52
Battalion 1	9:08
Station 11	9:01
Station 12	8:24
Station 13	10:07
Station 14	9:17
Station 15	10:20
Station 17	8:11
Battalion 2	9:53
Station 21	10:09
Station 23	15:12
Station 24	11:37
Station 26	8:26
Station 27	16:09
Battalion 3	11:33
Station 30	9:26
Station 31	11:30
Station 32	12:59
Station 34	9:07
Station 38	16:10

Source: Citygate 2020

Citygate found that fire unit travel time exceeds the NFPA objective of 4:00 minutes due to: 1) existing road network design/limitations (e.g., poor road layout, narrow and winding roads); and 2) the size of some areas served by the individual stations (i.e., almost all of SBCFD's "first-in" districts include both urban areas and large rural areas). For example, in Orcutt, the existing stations serve the unincorporated Urban Area of Orcutt and adjoining rural unincorporated areas. Citygate found that improving these response times could be difficult and would require the addition of two stations to assist underserved areas. Additionally, Citygate acknowledged that subdivision-level growth is envisioned by the County for future approval. In light of this, Citygate recommended the construction of a station in the Orcutt area to increase response capacity (Citygate 2020). As previously mentioned, SBCFD is planning a new Fire Station No. 25 in Orcutt on East Union Valley Parkway, adjacent to the existing City of Santa Maria Fire Department. The fire station is in its design phase and is tentatively anticipated to be completed in 2025 (personal communication with Division Chief, Robert Hazard 2023).



Concepts for the proposed Fire Station No. 25 in Orcutt were presented to the community in March 2022. It is anticipated that the station will be designed, constructed, and operational by 2025.
Source: SBCFD

Additional Fire Protection Services Serving Unincorporated Areas

As part of the Santa Barbara Operational Area Mutual Aid Plan, nine fire departments provide auto and mutual aid fire protection services to unincorporated areas of the county. Those fire departments include the Carpinteria-Summerland Fire Protection District, Guadalupe City Fire Protection District, Lompoc City Fire Department, Montecito Fire Protection District, Santa Maria City Fire Protection District, Vandenberg Space Force Base (VSFB), Santa Barbara City Fire Department, United States Forest Service (USFS) – Los Padres National Forest (LPNF), and CAL FIRE.

California Department of Forestry and Fire Protection

CAL FIRE is an emergency response and resource protection department. CAL FIRE serves over 31 million acres of California's privately owned wildlands, providing emergency service under agreement with 115 counties, cities, and districts. CAL FIRE responds to more than 8,400 wildland fires that burn an average of a million acres each year and conducts fire prevention projects. CAL FIRE's Fire Prevention Program consists of multiple activities including wildland pre-fire engineering, vegetation management, fire planning, education, and law enforcement. (CAL FIRE 2022a). In addition, CAL FIRE personnel answer the call over 500,000 times for other emergencies including structure fires, automobile accidents, medical aids, swift water rescues, civil disturbances, search and rescues, hazardous material spills, train wrecks, floods, and earthquakes (CAL FIRE 2022b).

CAL FIRE covers the state with 21 operational units, 812 fire stations (237 state and 575 local government), 30 conservation camps, 5 training centers, 14 air attack bases, and 10 helitack bases. CAL FIRE comprises over 9,600 full-time and seasonal firefighting professionals, foresters, and administrative employees, 2,750 local government volunteer firefighters, roughly 1,000 Volunteers In Prevention, and 4,300 inmates and wards. To transport and support these forces, CAL FIRE operates nearly 1,000 fire engines, 184 rescue squads, 63 paramedic units, 27 aerial ladder trucks, 58 bulldozers, six mobile communication centers, and 11 mobile kitchen units. Further, CAL FIRE funds an additional 82 engines and 12 bulldozers via contract with Kern, Los Angeles, Marin, Orange, Santa Barbara, and Ventura counties. Concerning aircraft, CAL FIRE operates 23 1,200-gallon air tankers, 12 helicopters, and 17 air tactical planes (CAL FIRE 2014, 2022b, 2022c).

CAL FIRE is responsible for fire protection within the SRAs. In most cases, CAL FIRE directly protects the SRA; however, six counties (including Santa Barbara County), known as "Contract Counties," provide SRA fire protection under contract with CAL FIRE. The SRA extends throughout most of Santa Barbara County, excluding most incorporated and federally owned lands. The County has the responsibility as a Contract County to implement the 2019 State Strategic Fire Plan for California in the county. As such, SBCFD functionally operates as a unit of CAL FIRE and is responsible for all Strategic Fire Plan activities within the county (Santa Barbara County Office of Emergency Management [SBCOEM] 2022). More information about wildland fire response, management, and firefighting strategies is available in Section 3.16, *Wildfire*.

Law Enforcement and Police Protection

Santa Barbara County Sheriff's Office

The Santa Barbara County Sheriff's Office (Sheriff's Office) is responsible for law enforcement in the unincorporated areas of the county, the County jail system, superior court security, and coroner functions. The Sheriff's Office is responsible for providing law enforcement services for approximately

200,000 people, which includes residents of the unincorporated county and some incorporated cities for which the Sheriff's Office provides contract law enforcement services. Within Law Enforcement Operations, there are three divisions, including Criminal Investigations, North County Operations, and South County Operations. The Sheriff's Office is also contracted to provide police services to the cities of Buellton, Carpinteria, Goleta, and Solvang (Santa Barbara County Sheriff's Office 2022).

Police Stations, Staffing, and Level of Service

The Sheriff's Office has approximately 600 full-time employees and 150 volunteers at more than 25 work sites located throughout Santa Barbara County. The County Sheriff's Headquarters is located at the County's Calle Real Campus in the Eastern Goleta Valley west of the City of Santa Barbara, and eight sub-stations are located in Buellton, Carpinteria, Goleta, Isla Vista, Lompoc, New Cuyama, Santa Maria, and Solvang, as well as an office on the Santa Ynez Band of Chumash Indian's Reservation (Table 3.13-4). Although the number varies, the Sheriff's Office currently includes approximately 260 law enforcement deputies and 200 custody deputies. Additionally, the Operations Support Division is comprised of highly trained and specialized units that support daily and administrative operations (Santa Barbara County Sheriff's Office 2022). Based on the number of law enforcement deputies and resident service population, the Sheriff's Office currently has a ratio of one police officer for approximately every 769 persons, or approximately 1.5 officers for every 1,200 persons. While the Sheriff's Office does not employ standard officer-to-population ratios as an operational metric, the County Comprehensive Plan provides target officer-to-population service ratios in some communities for land use and community planning. The Eastern Goleta Valley Community Plan identifies a target staffing level of at least one officer per 1,200 persons (Policy POL-EGV-1.1). The Orcutt Community Plan similarly identifies a target service ratio of one officer per 1,200 persons.

Table 3.13-4. Sheriff Stations and Sub-Stations in Santa Barbara County

Station Name	Address
South Coast	
Santa Barbara Headquarters	4434 Calle Real, Santa Barbara, CA
Carpinteria Station	5775 Carpinteria Avenue, Carpinteria, CA
Goleta Camino Real Marketplace Satellite Office	7042 Marketplace Drive, Goleta, CA
Isla Vista Foot Patrol Station	6504 Trigo Road, Isla Vista, CA
Santa Ynez Valley	
Santa Ynez Valley/Solvang Station	1745 Mission Drive, Solvang, CA
Buellton Station	140 W Highway 246, Buellton, CA
Santa Ynez Band of Chumash Indians Reservation	100 Via Juana, Santa Ynez, CA
Lompoc Valley	
Lompoc Station	3500 Harris Grade, Lompoc, CA
Santa Maria Valley	
Santa Maria Station	812-A West Foster Road, Santa Maria, CA
Cuyama Valley	
New Cuyama Valley Station	70 Newsome Street, New Cuyama, CA

Source: Santa Barbara County Sheriff's Office 2022

Emergency Medical and Healthcare Services

The Santa Barbara County Emergency Medical Service Agency (SBCEMSA), a division of the Santa Barbara County Public Health Department (SBCPHD), is the local emergency medical services agency responsible for the planning, implementation, and evaluation of emergency medical services within the county. This system, as defined in Division 2.5 of the California Health and Safety Code, consists of "an organized pattern of readiness and response services based on public and private agreements and operational procedures." Both the fire paramedics (employed by local fire stations) and the American Medical Response (AMR) ambulance service are under the authority of SBCEMSA and dispatched during emergencies. Ambulance services are currently provided by AMS; however, SBCFD has been approved to take over ambulance services in the county starting March 1, 2024. Patients served by EMS are taken to one of two trauma centers in the county, depending on the location and proximity of the incident. Santa Barbara Cottage Hospital, located in the City of Santa Barbara on the South Coast is a Level 1 trauma center. Marian Regional Medical Center, located in the City of Santa Maria in the North County, is a Level 2 trauma center. Most of the populated areas of the county are within 40 minutes of either of these two trauma centers. Depending on the type and location of the incident, patients are transported to the nearest or most appropriate trauma center.

Public Schools

Enrollment and Services

In Santa Barbara County, 20 school districts serve approximately 70,000 students (Santa Barbara County Education Office 2022a). Table 3.13-5 includes all 20 school districts within the county, as well as the number of students served and the schools operating within the district. The Santa Barbara County Education Office oversees over 200 programs and services that support high-quality education, as well as student services, professional development for educators, and fiscal services for districts. These programs include the Bilingual Authorization Program, the Countywide Volunteer Program, several Credential Programs, and many programs intended for students, families, and the communities that make up the county (Santa Barbara County Education Office 2022b).

The number of school-aged children varies across each of the 20 school districts within the county, ranging from 0.15 students per household at Goleta Union (Elementary) (Schoolworks, Inc. 2022a) to 0.58 students per household at Santa Maria-Bonita (Schoolworks, Inc. 2022b), and averages approximately 0.30 students per household. However, based on the countywide average number of school children (i.e., ages 5 to 18), the number of school-aged children per household countywide is 0.44 students per household (U.S. Census Bureau 2022).

The operating budget for each school district varies year-to-year, based on several factors, including student enrollment, student attendance, and state and federal funding. Operating revenue provided to school districts is generated by local property taxes accrued at the state level and then allocated to each school district based on average daily student attendance. Because state funding for capital improvements has historically lagged behind enrollment growth, physical improvements to accommodate new students are funded primarily by public debt (i.e., bond measures), supplemented by fees assessed on development projects.

Table 3.12-5. Santa Barbara County School Districts (2022)

School District	Enrollment	Capacity	Schools
Carpinteria Unified	2,070	2,793	Aliso Elementary; Canalino Elementary; Summerland Elementary; Carpinteria Family School; Carpinteria Middle School; Carpinteria High School; two small alternative high schools
Cuyama Joint Unified	175	N/A	Cuyama Joint Elementary School (K-8), Cuyama Valley High School (9-12), Sierra Madre Continuation High School (9-12)
Lompoc Unified	10,045	11,168	Seven Elementary Schools: Buena Vista, Clarence Ruth, Crestview, Fillmore, Hapgood, La Canada, Miguelito Two Middle Schools: Lompoc Valley, Vandenberg Three High Schools: Cabrillo, Lompoc, Maple Bob Forinash Community Day School La Honda STEAM Academy Los Berros Visual and Performing Arts Academy One Adult Education School Mission Valley School
Santa Barbara Unified (Elementary and Secondary)	15,059	18,725	Twelve Elementary Schools: Adams, Adelante (Charter), Cleveland, Franklin, Harding (University Partnership), McKinley, Monroe, Peabody (Charter), Roosevelt, Santa Barbara (Charter), Santa Barbara Community Academy, Washington Four Junior Highs (Middle Schools): Goleta Valley, La Colina, La Cumbre, Santa Barbara Five High Schools: Alta Vista (Alternative), Dos Pueblos, La Cuesta (Continuation), San Marcos, Santa Barbara
Cold Spring	196	N/A	Cold Spring School (TK-6)
Goleta Union (Elementary)	3,571	4,976	Brandon; El Camino; Ellwood; Foothill; Hollister; Isla Vista; Kellogg; La Patera; Mountain View
Hope (Elementary)	950	1,391	Hope, Monte Vista, and Vieja Valley
Montecito Union (Elementary)	374	550	Montecito Union Elementary School (K-6)
Santa Maria Joint Union (High School)	8,166	7,054	Four High Schools: Delta, Ernest Righetti, Pioneer Valley, Santa Maria Mark Richardson Career Technical Education Center and Agricultural Farm
Blochman Union	174	279	Benjamin Foxen School (K-8); Family Partnership Charter School (K-12); Trivium Charter School (K-12); Trivium Charter School (Adventure)(K-12); Trivium Charter School (Voyage) (K-12)
Guadalupe Union	1,280	1,214	Mary Buren Elementary School; Kermit McKenzie Intermediate School
Orcutt Union	5,181	4,718	One Pre-K Early Learning Center Seven Elementary Schools: Alice Shaw, Joe Nightingale, Olga Reed (K-8), Patterson Road, Pine Grove, Ralph Dunlap, Orcutt Academy (K-8, Charter) Two Middle Schools: Lakeview and Orcutt Junior High Schools Orcutt Academy High School (Charter) Orcutt School for Independent Study

Table 3.12-5. Santa Barbara County School Districts (2022) (Continued)

School District	Enrollment	Capacity	Schools
Santa Maria-Bonita	17,201	16,648	Seventeen Elementary Schools: Adam, Alvin, Arellanes, Battles, Bill Libbon, Bonita, Bruce, Fairlawn, Jiménez, Liberty, Miller, Oakley, Ontiveros, Rice, Sanchez, Taylor, Tunnell Four Junior Highs (Middle Schools): Arellanes, El Camino, Fesler, Tommy Kunst
Santa Ynez Valley Union (High School)	926	959	Santa Ynez High School (9-12); Refugio High School (10-12)
Ballard	120	150	Ballard Elementary School (K-6)
Buellton Union	564	645	Jonata Middle School (6-8); Oak Valley Elementary School (TK-5);
College	200	625	College Elementary School (PreK-K); Santa Ynez Elementary School (1-8); Santa Ynez Valley Charter School (K-8)
Los Olivos	153	N/A	Los Olivos School (K-8); Olive Grove Charter School (K-12)
Solvang (Elementary)	578	651	Solvang School (K-8)
Vista Del Mar Union	38	N/A	Vista de Las Cruces School (K-8)

N/A = School capacity information not available.
Source: Santa Barbara County Education Office 2022c.

Libraries

Library services in the county are provided by the county's incorporated cities' main libraries and various branch locations as a means to efficiently use existing facilities and prevent the creation of County-operated duplicate establishments. The library service are grouped into five zones. Zone 1 (Santa Barbara) provides services to the City of Santa Barbara and unincorporated areas located within or near Santa Barbara, Montecito, Summerland, and Mission Canyon. Zone 2 (Lompoc) provides services to the City of Lompoc, as well as the unincorporated areas located within or near the City of Lompoc, Vandenberg Village, VSFB, Mission Hills, and Mesa Oaks. Zone 3 (Santa Maria) provides services to the cities of Santa Maria and Guadalupe, as well as the unincorporated areas located within or near these cities, Cuyama, New Cuyama, Los Alamos, and Orcutt. Zone 4 (Goleta) provides services to the cities of Goleta, Buellton, and Solvang, as well as the unincorporated areas located within or near these cities, Solvang, Eastern Goleta Valley, County Service Area 3 (Goleta Valley), Hope Ranch, Isla Vista, Gaviota, Santa Ynez, and Los Olivos. Zone 5 (Carpinteria) provides services to the City of Carpinteria, as well as the unincorporated areas located within or near the City of Carpinteria and Toro Canyon (County of Santa Barbara 2022a).

The County's contribution to library services for each zone is based on the population of the cities and unincorporated areas within the respective zone, as certified on January 1st of the prior fiscal year by the California State Library Public Fund (County of Santa Barbara 2023). In addition, the County's Library Advisory Committee makes recommendations to the County to ensure adequate library services to all county residents.

3.13.2.2 Parks and Recreation

This section describes the existing public parks and recreation system serving the unincorporated areas of Santa Barbara County, including neighborhood and regional parks and recreational facilities, including public trails, provided by the County and other public recreation agencies. A range of recreational facilities are provided by the County and two recreation special districts, as well as state and federal agencies. The Program EIR summarizes existing recreation facilities based on three categories of public property types, as follows:

- **"Public parkland"** is developed with recreation facilities that are free and openly accessible to the public. Public parkland can provide both active and passive recreation depending on the park type and location, including sports fields and courts, playgrounds, BBQ and picnic areas, restrooms, trails, and other recreational facilities.
- **"Public open spaces"** are largely undeveloped and primarily provide resource protection and land conservation but may support low-intensity outdoor recreation (e.g., hiking or bird watching) in balance with natural resource preservation.
- **"Campgrounds"** provide low-cost overnight accommodations (i.e., tent sites, RV sites, cabin or yurt rentals) plus related recreational facilities. Campgrounds are typically available only on a fee-based and reservation basis. Campgrounds are often located near trail systems to support outdoor recreation combined with low-cost overnight accommodations.

Local Parks, Trails, and Recreation Facilities

County Parks

The County Community Services Department, Parks Division (County Parks) owns and maintains 51 public properties in the unincorporated area of the county.



County Parks provides a range of public parkland and amenities ranging from neighborhood parks, community parks such as Orcutt Community Park (pictured), and regional parks such as Waller Park.
Source: Lompoc Record

Taken together, County Parks' properties comprise approximately 2,732 acres with an estimated 2,151 acres serving the North County and 581.4 acres serving the South Coast. Approximately 717 acres (26.2 percent) within 33 properties are public parkland providing recreation facilities on land open and accessible to the public. In addition, County Parks operates two campgrounds: 1) the 27-acre Jalama Beach County Park in the Lompoc Valley, which is County-owned and provides fee-based access to a popular coastal campground and day-use facilities; and 2) the campground and recreation facilities within the federally-owned Cachuma Lake Recreation Area, which provides fee-based lakefront camping, a general store, a gas station, boat rentals, a playground, and a disc golf course on over 9,500 acres surrounding Lake Cachuma in the Santa Ynez Valley. County Parks also maintains 1,989 acres (72.8 percent) within 17 properties that are public open space, including several properties with open access to public trails and walking paths, such as the Orcutt Hills Trail System in the Santa Maria Valley, which provides

approximately 8 miles of multi-use trails, and San Marcos Foothill Preserve in the South Coast, which provides approximately 5-mile-long main trail with several spurs and connectors. The Cachuma Lake Recreation Area also provides six trails in the Santa Ynez Valley comprising approximately 20 miles of trails, including the Live Oak Campground trail system. Further, several County-owned trails connect to the Los Padres National Forest trail systems in the South Coast, Santa Ynez Valley, and Cuyama Valley. For example, trails in Montecito, such as Manning Park, provide access to on-road and off-road trails that reach the front country foothills of the Santa Ynez Mountains. A complete list of County Parks' properties is provided in Table 3.13-6, including the location, type, and approximate size of each public property.

Table 3.13-6. County Parks' Properties by Location, Type, and Size (Acres)

County Parks by Region	Community/Location	Type	Acres
Cuyama Valley			
Richardson County Park	New Cuyama	Public Parkland	15.7
		Total Cuyama Valley	**15.7**
Lompoc Valley			
Jalama Beach County Park	Unincorporated Lompoc	Campground	26.6
Ocean Beach Park	Unincorporated Lompoc	Public Parkland	38.9
Miguelito County Park	Unincorporated Lompoc	Public Parkland	5.4
Santa Rosa Park	Unincorporated Lompoc	Public Parkland	24.3
Falcon Open Space Park	Vandenberg Village	Public Parkland	0.9
Vandenberg Hills Little League Fields	Vandenberg Village	Public Parkland	7.5
		Total Lompoc Valley	**103.7**
Santa Maria Valley			
Cobblestone Open Space	Orcutt	Public Parkland	3.0
Domino Open Space	Orcutt	Public Parkland	1.2
Lee West Open Space	Orcutt	Public Parkland	1.7
Orcutt Community Park	Orcutt	Public Parkland	25.6
Orcutt Hills Trails East	Orcutt	Public Open Space	51.0
Orcutt Hills Trails West	Orcutt	Public Open Space	256.1
Rice Ranch Open Space	Orcutt	Public Open Space	0.8
Stonebrook Open Space	Orcutt	Public Open Space	3.1
Waller Park	Orcutt	Public Parkland	134.2
Point Sal[3]	Unincorporated Santa Maria	Public Open Space	44.4
Point Sal Preserve	Unincorporated Santa Maria	Public Open Space	759.1
Rancho Guadalupe Dunes County Park	Unincorporated Santa Maria	Public Open Space	614.9
		Total Santa Maria Valley	**1,894.9**
Santa Ynez Valley			
Los Alamos Park	Los Alamos	Public Parkland	49.9
Santa Ynez Park	Santa Ynez	Public Parkland	3.2
Nojoqui Falls County Park	Unincorporated Santa Ynez	Public Parkland	83.5
		Total Santa Ynez Valley	**136.6**

Table 3.13-6. County Parks' Properties by Location, Type, and Size (Acres) (Continued)

County Parks by Region	Community/Location	Type	Acres
South Coast			
Arroyo Burro Beach County Park	City of Santa Barbara	Public Parkland	6.0
Blueberry Hill Neighborhood Park	Eastern Goleta Valley	Public Parkland	2.2
Calle Barquero Open Space	Eastern Goleta Valley	Public Parkland	2.1
Goleta Beach County Park	Eastern Goleta Valley	Public Parkland	33.1
Kellogg Open Space	Eastern Goleta Valley	Public Parkland	8.4
Lassen Open Space	Eastern Goleta Valley	Public Open Space	2.0
More Mesa Open Space	Eastern Goleta Valley	Public Open Space	36.3
Patterson Open Space	Eastern Goleta Valley	Public Open Space	3.1
Rhoads Neighborhood Park	Eastern Goleta Valley	Public Parkland	1.0
Rhoads Open Space	Eastern Goleta Valley	Public Parkland	0.8
San Marcos Foothills Preserve	Eastern Goleta Valley	Public Open Space	200.1
Tabano Hollow Open Space	Eastern Goleta Valley	Public Parkland	1.9
Tarragona Open Space	Eastern Goleta Valley	Public Open Space	3.0
Teardrop Open Space	Eastern Goleta Valley	Public Open Space	0.3
Thunderbird Open Space	Eastern Goleta Valley	Public Open Space	0.9
Town & Country Open Space	Eastern Goleta Valley	Public Open Space	6.3
Tuckers Grove Park	Eastern Goleta Valley	Public Parkland	111.4
University Circle Open Space	Eastern Goleta Valley	Public Parkland	11.7
Pelican Park	Isla Vista	Public Parkland	1.0
Sea Lookout Park	Isla Vista	Public Parkland	1.3
Walter Capps Park	Isla Vista	Public Parkland	2.1
Rocky Nook Park	Mission Canyon	Public Parkland	17.0
Hammond's Meadow	Montecito	Public Open Space	5.4
Manning Park	Montecito	Public Parkland	11.8
Lookout Park	Summerland	Public Parkland	6.6
Ocean View Park	Summerland	Public Parkland	3.2
Summerland Greenwell Preserve	Summerland	Public Open Space	1.8
Toro Canyon Park	Toro Canyon	Public Parkland	88.9
Rincon Beach Park	Unincorporated South Coast	Public Parkland	11.6
		Total South Coast	**581.4**

Summary	Acres	Percentage	Number
Total County Parks	**2,732.3**	**100.0%**	**51**
Total Public Parkland	*717.0*	*26.2%*	*33*
Total Open Space	*1,988.6*	*72.8%*	*17*
Total Campground	*26.6*	*1.0%*	*1*

Notes:
[1] Total acreage is approximate based on County Assessor Parcel boundaries and ownership data and may not reflect the physical acreage maintained accessible for public recreation (Rounded to the nearest tenth).
[2] Cachuma Lake Recreation Area is owned by the federal government and operated by County Parks; therefore, the Cachuma Lake Recreation Area is not included.
[3] The County owns portions of Point Sal and Point Sal Reserve.
Source: County Parks 2023.

Recreation Special Districts

In addition to County Parks, two recreation special districts have been formed in the county to provide public recreation in specific unincorporated communities. The Cuyama Valley Recreation District (CVRD) owns and maintains 13.1 acres of public parkland as part of Richardson Park in the unincorporated community of New Cuyama in the Cuyama Valley, which increases the total park area to 28.2 acres when combined with the County-owned portion of Richardson Park~~Richardson park~~. The Isla Vista Recreation and Park District (IVRPD) owns and maintains 50.1 acres within 17 parks and open spaces in the unincorporated community of Isla Vista, which comprises 16.8 acres of public parkland and 33.3 acres of public open space (Table 3.13-7). Combined with County-owned parks in Isla Vista, the community is served by 54.5 acres in 20 public parks and open spaces.

Table 3.13-7. Recreation Special Districts' Properties by Location, Type, and Size (Acres)

Recreation Special Districts	Community/Location	Type	Acres
Cuyama Valley Recreation District (CVRD)			
Richardson Park (CVRD)	New Cuyama	Public Parkland	13.1
Isla Vista Recreation and Park District (IVRPD)			
Camino Corto Open Space	Isla Vista	Public Open Space	21.5
Camino Pescadero Park	Isla Vista	Public Parkland	0.5
Childrens Park	Isla Vista	Public Parkland	0.7
Del Sol Vernal Pool Reserve	Isla Vista	Public Open Space	11.8
Embarcadero Park	Isla Vista	Public Parkland	4.3
Estero Park & Tipi Village	Isla Vista	Public Parkland	6.8
Gaffney Park	Isla Vista	Public Parkland	0.5
Greek Park	Isla Vista	Public Parkland	0.5
Isla Vista Recreation and Park District	Isla Vista	Public Parkland	0.3
Kid's Trail Park	Isla Vista	Public Parkland	0.2
Little Acorn Park	Isla Vista	Public Parkland	0.6
Pardall Gardens	Isla Vista	Public Parkland	0.2
Rottapel Park	Isla Vista	Public Parkland	0.2
Sueno Orchard	Isla Vista	Public Parkland	0.9
Sueno Park	Isla Vista	Public Parkland	0.4
Trigo Pasado Park	Isla Vista	Public Parkland	0.3
Window to the Sea Park	Isla Vista	Public Parkland	0.3
		Total Recreation Special District Properties	**63.2**

Summary	Acres	Percentage	Number
Total Recreation Special Districts	**76.3**	**100.0%**	**18**
Total Public Parkland	*29.9*	*39.2%*	*16*
Total Open Space	*33.3*	*43.6%*	*2*
Total Campground	*0.0*	*0.0%*	*0*

Notes:
[1] Total acreage is approximate based on County Assessor Parcel boundaries and ownership data and may not reflect the physical acreage maintained accessible for public recreation (Rounded to the nearest tenth).
Source: County Parks 2023.

Summary of Public Parks and Public Open Space by Region

Considering the public parkland and public open space properties listed in Table 3.13-6 and Table 3.13-7, all five Housing Market Areas (HMAs) are served by a total of 2,769 acres of existing public parkland and public open space in the unincorporated areas. Public parkland comprises 747 acres (27.0 percent) and public open space comprises 2,022 acres (73.0 percent) of the park and open space properties provided by County Parks, IVRPD, and CVRD combined. The Santa Maria Valley has the most public parkland and public open space in the unincorporated area (1,894.9 acres; 68.4 percent); however, this total acreage is provided by only 12 properties, and a majority (90 percent) is provided as public open space with limited access and few recreational facilities, including Point Sal State Park and Rancho Guadalupe Dunes County Parks. For example, Rancho Guadalupe Dunes provides a small area for restroom and picnic tables but is otherwise undeveloped coastline with no recreation amenities and substantial limitations to public access in support of sensitive species and coastal habitat protection (i.e., snowy plover habitat management). Similarly, on the South Coast, public open space comprises 293 acres, which is nearly half of the acreage provided by County Parks and IVRPD combined. As a result, when considering only properties with recreation facilities, the South Coast has the most public parkland (339 acres; 45.4 percent). Table 3.13-8 summarizes the total public parkland and public open space provided by County Parks, IVRPD, and CVRD in each region.

Table 3.13-8. Public Parkland and Public Open Space by Region

Region	Total Public Parkland (Acres)	Total Public Open Space (Acres)	Total Public Parkland + Public Open Space (Acres)
Cuyama Valley	28.8 (3.8%)	0.0 (0.0%)	28.8 (1.0%)
Lompoc Valley	77.0(10.3%)	0.0 (0.0%)	77.0 (2.8%)
Santa Maria Valley	165.6 (22.1%)	1,729.4 (85.7%)	1,894.9 (68.4%)
Santa Ynez Valley	136.6 (18.2%)	0.0 (0.0%)	136.6 (4.9%)
South Coast	338.9 (45.4%)	292.5 (14.5%)	631.5 (22.8%)
Total Unincorporated County	**746.9 (100%)**	**2,021.9 (100%)**	**2,768.8 (100%)**

Source: County Parks 2023.

In County Parks' dual role as a public recreation provider and a conservator of land for both outdoor recreation and resource protection, the public open spaces identified in Table 3.13-6 and Table 3.13-7 are valuable assets for the County. (See Section 3.4, *Biological Resources* for analysis of biological resources associated with public open space in the county.) However, these public open spaces do not provide existing neighborhood and regional parks or other recreational facilities that are subject to public use that may deteriorate the facility's physical condition per CEQA (i.e., playgrounds, sports fields and courts, public restrooms, BBQs, picnic tables). In contrast, public parkland provides neighborhood and regional parks and recreational facilities that are subject to use, maintenance, and deterioration as public recreation facilities under CEQA Guidelines. For this reason, this Program Environmental Impact Report (EIR) evaluates the existing public parks and recreation system based on existing public parkland only, considering the potential impacts of increased use that would deteriorate recreation facilities or inadequately serve recreation facility needs in the unincorporated county. A list of public open space and County-owned campgrounds are disclosed as part of this section, but not considered further in this analysis because they do not have recreational facilities defined per CEQA Guidelines.

Existing Recreation Service Levels

One approach to assessing the adequacy of the public parks and recreation system is to consider the ratio of public parkland in acres to the total population served by the system. Achieving this target service ratio ensures that communities are adequately served by public recreation facilities in the unincorporated areas. The County's policy-based standard for parkland-to-population is 4.7 acres of public parkland per 1,000 people as adopted in the Land Use Element of the County's Comprehensive Plan. Based on existing populations estimated by the 2020 U.S. Census for unincorporated areas, the existing public parkland ratio countywide is 5.3, which exceeds the County's adopted population service ratio. This indicates that currently the unincorporated area is adequately served by more public parkland than the County's adopted parkland standard.

Table 3.13-9. Existing Public Parkland-to-Population Ratio in Unincorporated County

Total Unincorporated Area Population (2020)	Total Public Parkland (Acres)	Ratio of Public Parkland (Acres/1,000 people)
140,115	746.9	5.3

Notes:

[1] Population is estimated based on 2020 U.S. Census data for unincorporated areas only. Populations within federally-owned lands and/or outside the County's jurisdiction are not included in the total population. Refer also to Section 3.12, *Population and Housing*.

[2] Total public parkland combines properties owned and operated by County Parks, IVRPD, and CVRD located in unincorporated areas only.

Sources: County Parks 2023; U.S. Census Bureau 2020.

Another consideration in assessing the adequacy of a public parks and recreation system is the location and accessibility of public parks and open spaces. Public parkland in the unincorporated area is located in both urban communities and rural areas and, as a result, the accessibility of existing parks varies by location. Public parks in urban communities typically lie within 0.25 to 0.5 miles of residential neighborhoods and are connected via a multi-modal transportation network that places residents within walking, biking, or transit distance of recreation. In contrast, public parkland in rural areas typically lies more than 0.5 miles from residential neighborhoods in existing communities and is not accessible via a multi-modal transportation network that facilitates walking, biking, and transit. As described in Table 3.13-10, approximately 506 acres (67.7 percent) of public parkland is located within urban communities and are reasonably accessible to existing residential neighborhoods via active transportation modes, such as walking and biking and transit, including 256 acres in North County and 250 acres on the South Coast. A description of key County Parks properties that serve existing urban residential neighborhoods is provided in Table 3.13-11.

Table 3.13-10. Accessibility of Public Parkland by Region (Acres)

Region	Public Parkland Accessible to Urban Communities via Active Transportation (Acres)	Public Parkland Located Remotely from Urban Communities (Acres)	Total (Acres)
Cuyama Valley	28.8	0.0	28.8
Lompoc Valley	8.4	68.6	77.0
Santa Maria Valley	165.6	0.0	165.6
Santa Ynez Valley	53.1	83.5	136.6
South Coast Valley	250.0	88.9	338.9
Total Unincorporated County	**505.9**	**241.0**	**746.9**

Table 3.13-11. Key County Parks Accessible to Existing Residential Areas

Park Name	Location/ Community	Description
Goleta Beach County Park	South Coast – Eastern Goleta Valley	Goleta Beach County Park is a 33-acre beach park providing a restaurant, beach-going, fishing, and boating. The park has four reservable BBQ areas that can accommodate 25 to 210 people. There are numerous picnic tables and benches, as well as restrooms, a playground, and horseshoe areas. There is also a multi-use trail connecting the UCSB and the Eastern Goleta Valley.
Kellogg Open Space	South Coast – Eastern Goleta Valley	Kellogg Open Space is an 8-acre neighborhood park providing three tennis courts and four pickleball courts. Most of the park is a wooded area interspersed with grassy open spaces and trails with benches.
Lookout Park	South Coast – Summerland	Lookout Park is a 7-acre neighborhood park in Summerland. The park features two reservable group BBQ areas that can accommodate 25 people each. There are also picnic tables and benches, a horseshoe area, a playground, a restroom, a trail, and an outdoor volleyball court. The trails provide beach access to a popular bird-watching and surfing spot at Summerland Beach.
Los Alamos Park	Santa Ynez – Los Alamos	Los Alamos County Park is a 50-acre community park south of the community of Los Alamos. Three reservable BBQ areas can accommodate 50 to 125 people. Multi-use trails throughout the park connect open spaces, as well as picnic tables, horseshoe areas, a playground, and a restroom.
Manning Park	South Coast – Montecito	Manning Park is a 12-acre neighborhood park in Montecito. Six reservable BBQ areas can accommodate 40 to 310 people. Multi-use trails throughout the park connect open spaces, as well as picnic tables, one baseball/softball field, one tennis court, picnic tables, a playground, restrooms, and a horseshoe area.
Ocean View Park	South Coast – Summerland	Oceanview Park is a 3-acre neighborhood park at the eastern end of Summerland. The park features benches and picnic tables, BBQ areas, and a walking path. Most of the park is made up of a large open grassy area that overlooks the ocean.

Table 3.13-11. Key County Parks Accessible to Existing Residential Areas (Continued)

Park Name	Location/ Community	Description
Orcutt Community Park	Santa Maria – Orcutt	Orcutt Community Park is a 26-acre community park located on the south side of Orcutt. This public park provides two baseball fields and two soccer fields to support active sports, as well as a playground. An off-leash dog recreation area is fenced within 2.5 acres, providing dedicated areas for small and large dogs plus amenities such as dog water fountains and seating areas. Amenities for gatherings include BBQs, picnic tables, restrooms, and group picnic areas. Orcutt Community Park contains trailheads to the Orcutt Hills, which provide hiking trails to local and regional networks in Santa Maria Valley.
Richardson County Park	Cuyama – New Cuyama	Richardson County Park is a 16-acre neighborhood park in New Cuyama, abutting 13 acres of parkland managed by the CVRD. The County Park includes BBQ grills, picnic tables, group picnic areas, hiking trails, a playground, and restrooms. Joseph Centeno Cuyama Aquatics Complex is also located within the County Park. The part of the park managed by the CVRD includes two baseball/softball fields and a soccer field.
Rincon Beach Park	South Coast – Carpinteria	Rincon Beach Park is a 12-acre beach park south of Carpinteria on the coast. This public park provides beach access, picnic tables, restrooms, and BBQ areas, including one reservable area with a capacity for 80 people. The park provides an approximately 0.3-mile-long walking trail that runs parallel to the coast.
Rocky Nook Park	South Coast – Santa Barbara	Rocky Nook Park is a 23-acre community park in Santa Barbara. The park has one reservable BBQ area that can accommodate up to 50 people. The park offers shaded picnic areas, short trails, and large sandstone boulders for kids to climb. Trails at the park are popular for equestrians and dog walkers. Amenities at Rocky Nook include a horseshoe area, a playground, and restrooms.
San Marcos Preserve Park	South Coast – Eastern Goleta Valley	San Marcos Park is a planned County Park consisting of three parcels totaling 10 acres along Via Gaitero north of Cathedral Oaks Road, adjacent to the 200-acre San Marcos Foothills Preserve near SR 154 and Foothill Road. The new park will serve as a gateway to the San Marcos Preserve and provide passive park amenities that will be determined through the master planning process. San Maros Preserve provides approximately 1.3 miles of hiking trails.
Santa Ynez Park	Santa Ynez – Santa Ynez	Santa Ynez Park is a 3-acre neighborhood park in Santa Ynez. It has two reservable BBQ areas that can accommodate up to 100 people each, and a reservable indoor kitchen. The park has restrooms, a playground, picnic tables and benches, and an outdoor volleyball court.

Table 3.13-11. Key County Parks Accessible to Existing Residential Areas (Continued)

Park Name	Location/ Community	Description
Tuckers Grove Park	South Coast – Eastern Goleta Valley	Tuckers Grove Park is a 113-acre community park between Santa Barbara and Goleta off Cathedral Oaks Road. One of the most popular features of the park is its large off-leash dog park. The park has eight reservable BBQ areas that can accommodate 25 to 400 people. Visitors can enjoy large grassy open spaces, horseshoe areas, playgrounds, and restrooms. Trails at the park are popular for equestrians, dog walkers, and cyclists.
Waller Park	Santa Maria –Orcutt	Waller Park is a 154-acre regional park in Orcutt. This public park provides 11 reservable group picnic areas that can accommodate 16 to 310 people, as well as benches, picnic tables, and BBQ areas. There are trails throughout the park, a disc golf course, and several areas with restrooms and playgrounds. A large duck pond is in the center of the park surrounded by benches and grassy open space. For active sports, the park contains four baseball/softball fields and six pickleball courts within the Hagerman Sports Complex, which is owned and operated by the City of Santa Maria. There is also a large off-leash dog park called Woof P.A.C. Park within Waller Park.



Some unincorporated residential neighborhoods are underserved by public parkland, such as Eastern Goleta Valley, which has one neighborhood park serving areas south of U.S. Highway 101 (Rhoads Park, pictured).
Source: County Parks

As indicated in Table 3.13-10, some public parks in unincorporated areas are located in rural areas remote from existing residential neighborhoods or urban communities. Parks in rural areas provide regional recreational opportunities but do not provide residents with accessible playgrounds, sports fields and courts, trails, and open spaces within walking or biking distance. For example, Nojoqui Falls County Park in the Santa Ynez Valley is a community park located approximately 6 miles from the nearest urban community (i.e., the City of Solvang) and is only accessible via narrow rural roadways. Similarly, Miguelito County Park is a community park located approximately 5 miles south of the City of Lompoc and is surrounded by rural and agricultural areas. In contrast, however, most public parks are located proximate to existing urban communities and neighborhoods in the Lompoc Valley. In the Santa Maria Valley, Orcutt Community Park provides active recreation facilities in the southern neighborhoods of Orcutt and is accessible via local roads and transit. On the South Coast, most public parkland lies within existing neighborhoods and is generally accessible via local roadways and trails. For example,

Goleta Beach Park is located near the City of Goleta and Eastern Goleta Valley and is directly accessed from regional multi-use trails. However, even within communities that are served by more public parkland than others, some neighborhoods are underserved. For example, as identified in the Eastern Goleta Valley Community Plan, neighborhoods located south of U.S. Highway 101 have no public community parks and are served only by Rhoads Park, a single 1-acre neighborhood park. Other than Rhoads Park, residents in this area must travel at least 1 to 2 miles to reach Tuckers Grove or Goleta Beach for public parkland in the unincorporated area. Similarly, in Orcutt, existing public parkland lies primarily on the edges of the communities, such as Orcutt Community Park to the south and Waller Park to the north. Neighborhoods along Union Valley Parkway, Clark Avenue, and Old Town Orcutt are located at least 1 to 2 miles from these public parks (County Parks 2023).

State and Federal Parks and Recreation Facilities

In addition to recreation facilities provided by County Parks and recreation special districts, several California State Parks and State Beaches are located within the county, as well as one National Forest (i.e., LPNF). California State Beaches within the county include Point Sal, which is a rural coastal access point, and Refugio, El Capitan, and Carpinteria, which provide coastal access and camping. The county contains four State Parks as well, including Chumash Painted Cave State Historic Park, El Presidio de Santa Barbara State Historic Park, Gaviota State Park, and La Purisima Mission State Historic Park (California Department of Parks and Recreation 2022). A portion of the LPNF also falls within the county and provides campgrounds, day-use areas, and trails.

3.13.3 Regulatory Setting

Federal, state, and local regulations have been enacted to address public services and recreation in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.13.3.1 Federal

National Fire Protection Association 1710

National Fire Protection Association (NFPA) 1710 is the standard for the organization and deployment of fire suppression operations, emergency medical operations, and special operations to the public by career fire departments. NFPA developed NFPA 1710 as an industry standard for the deployment of fire suppression operations to ensure safe and effective fire service operations. The Standard stipulates that the first fire engine should arrive at 90 percent of emergency calls within a range of 6:15 and 6:45 minutes. It is recognized that the NFPA 1710 Standard is the optimal national standard and is not regularly achieved in rural areas or areas otherwise far removed from firefighting service providers.

3.13.3.2 State

California Fire Code

The California Fire Code (CFC) is Part 9 of thirteen parts of the official building regulations to the California Code of Regulations. This code is also referred to as Title 24, or the California Building

Standards Code. The CFC establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC applies to the construction – including the presence of fire service features and fire apparatus access roads – alteration, movement, enlargement, replacement, repair, equipment, use, occupancy, means of egress, evacuation plans, location, maintenance, and demolition and removal of every building or structure or any appurtenances connected or attached to such building structures throughout the state.

California Health and Safety Code

State fire regulations outlined in California Health and Safety Code Sections 13000 et seq., address building standards, fire protection, and notification systems, provision of fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Education Code Section 17620 and Government Code Section 65995

California Education Code Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirement against any construction of new residential, commercial, and industrial uses within their boundaries to fund the construction of new schools or school facilities. California Code of Regulations Section 65995 limits the maximum fee that school districts can assess.

California Occupational Safety and Health Administration

Per Title 8, California Code of Regulations Section 1270, Fire Prevention, and Section 6773, Fire Protection and Fire Fighting Equipment, the California Occupational Safety and Health Administration (Cal-OSHA) has established minimum standards for fire suppression and EMS. The standards include but are not limited to guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, requirements for access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

Senate Bill (SB) 50

Senate Bill (SB) 50, or the Leroy F. Greene School Facilities Act of 1998, amends Education Code Section 17620 and authorizes school districts to levy developer fees to finance the construction or reconstruction of school facilities and restricts the ability of local agencies to deny project approvals on the basis that public school facilities (classrooms, auditoriums, etc.) are inadequate. School impact fees are collected at the time when building permits are issued. Payment of school fees is required by SB 50 for all new residential development projects and is considered full and complete mitigation of any school impacts. School impact fees are payments to offset capital cost impacts associated with new developments, which result primarily from costs of additional school facilities, related furnishings and equipment, and projected capital maintenance requirements. As such, agencies cannot require additional mitigation for any impacts on school facilities or due to the inadequacy of school facilities.

School Mitigation Fee (Government Code Section 65996)

Government Code Section 65996 designates Education Code Section 17620 (i.e., the mitigation fees authorized by SB 50) and Government Code Section 65970 to be the exclusive method for considering and mitigating development impacts on school facilities.

Quimby Act (1975) and Assembly Bill (AB) 1359

The Quimby Act within the Subdivision Map Act gives cities and counties the authority, by ordinance, to require the dedication of land or payment of in-lieu fees, or a combination of both, for park and recreation purposes as a condition of approval of tentative or parcel subdivision map. The Quimby Act specifies that parkland dedications may not exceed 3 acres of parkland per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case, the city or county may adopt a higher standard not to exceed 5 acres of parkland per 1,000 residents to serve the needs of residents of the subdivision and the greater public residing in the city or county.

Assembly Bill (AB) 1359 amended the Quimby Act to allow fees paid pursuant to the Quimby Act to also be used to develop or rehabilitate park or recreational facilities in a neighborhood other than the neighborhood in which the subdivision is located if certain requirements are met. In addition, AB 1359 authorizes the use of joint or shared use agreements to facilitate access to park or recreational facilities for residents in specified areas.

Education Code Sections 41376 and 41378

Education Code Sections 41376 and 41378 prescribe the maximum class sizes and penalties for districts with any classes that exceed the limits established in 1964.

- Kindergarten – average class size not to exceed 31 students; no class larger than 33 students
- Grades one through three – average class size not to exceed 30 students; no class larger than 32 students
- Grades four through eight – in the current fiscal year, the average number of students per teacher not to exceed the greater of 29.9 (the statewide average number of students per teacher in 1964) or the district's average number of students per teacher in 1964.

If the above limits are exceeded, the statute requires the Superintendent of Public Instruction to reduce the district's revenue limit apportionment for each student over the limit. In short, this means that the penalty for exceeding the limit is a loss in all revenue limit funding for each student over the limit.

Mello-Roos Community Facilities Act of 1982

In 1982, the Mello-Roos Community Facilities Act of 1982 (Government Code Sections 53311-53368.3) was created to provide an alternate method of financing needed improvements and services. The Act allows any county, city, special district, school district, or joint powers authority to establish a Mello-Roos Community Facilities District (CFD), which allows for the financing of public improvements and services through the collection of additional property taxes. The services and improvements that Mello-Roos CFDs can finance include streets, sewer systems and other basic infrastructure, fire protection, law enforcement and police protection, ambulance services, schools,

parks, libraries, museums, and other cultural facilities. By law, the CFD is also entitled to recover expenses needed to form the CFD and administer the annual special taxes and bonded debt (California Tax Data 2023a).

Landscaping and Lighting Act of 1972

The Landscaping and Lighting Act of 1972 allows local governmental agencies to form Landscape and Lighting Maintenance Districts to finance the costs and expenses of landscaping and lighting public areas. This act can be used by any local agency including cities, counties, and special districts such as school districts or water districts. The many approved uses include the installation and maintenance of landscaping, statues, fountains, general lighting, traffic lights, recreational and playground courts and equipment, and public restrooms. Additionally, the Act allows the acquisition of land for parks and open spaces, plus the construction of community centers, municipal auditoriums, or halls to be financed. Notes or bonds can be issued to finance larger improvements under the Act (California Tax Data 2023b).

3.13.3.3 Local

Santa Barbara County Comprehensive Plan

The County Comprehensive Plan is a planning document including research, analyses, and goals to enable the Santa Barbara County Board of Supervisors and Planning Commissions to determine matters of priority more effectively in the allocation of resources and to achieve the physical, social, and economic goals of the unincorporated communities within the county. The following components of the Comprehensive Plan are related to public services and recreation.

Open Space Element

The Santa Barbara County Comprehensive Plan Open Space Element discusses designated regions within the county that should remain open space and the reasons why. The reasons for the designation of open space are for public health and safety, for the managed production of resources, for outdoor recreation, and for the preservation of natural resources. Open space for public health and safety includes consideration of fire hazard areas.

Land Use Element

The Santa Barbara County Comprehensive Plan Land Use Element was adopted in 1980 and comprises a variety of research findings, Advisory Committee goals and policies, and proposals from the other Comprehensive Plan Elements. The purpose of this element is to interrelate all of the different factors that affect population growth, urban development, and open land preservation and to represent the County's policy on land use. This Element also determined that 4.7 acres of parkland are needed for every 1,000 persons. Per the Land Use Element, the number of trail miles for riding and hiking paths have not been quantified, but it is acknowledged that the desire by the public for easy and close access to trails and bikeways requires many additional miles of trails and paths to meet demand from residents and visitors.

Land Use Development Policies

4. Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that

adequate public or private services and resources (e.g., water, sewer, and roads) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.

Parks, ~~and~~ Recreation, and Trails Policies

The Land Use Element includes the following Parks/Recreation Policies that apply to public parks and open space.

3. Future development of parks should emphasize meeting the needs of the local residents.

4. Opportunities for hiking and equestrian trails should be preserved, improved, and expanded wherever compatible with surrounding uses.

5. Schools and other public-owned lands should be utilized for joint-use recreational activities whenever possible.

Proposed Public or Private Park/Recreation Facility Overlay

The 1980 Land Use Element also includes a Proposed Public or Private Park/Recreational Facility Overlay to identify future sites to be designated for recreation. This designation identifies by an overlay those lands suitable for future inclusions within the recreational designation defined above. These lands include the following:

- Lands selected by the County Park Department from those sites designated as having the highest suitability for recreational use;
- Areas designated by advisory committees;
- Shoreline areas designated within the County coastal zone; and
- Additional access along creeks and drainage ways.

There are currently four locations designated with the Proposed Public or Private Park/Recreational Facility Overlay totaling 134 acres. In the South Coast, there are three sites with this overlay, including the Las Varas Ranch and Dos Pueblos Ranch on the Gaviota Coast, and a 23-acre vacant parcel in the center of the Eastern Goleta Valley that is planned for residential and recreational uses. The fourth site within this overlay lies in New Cuyama and currently supports Richardson Park. These sites have been designated with this overlay for decades and only one (Richardson Park) has been developed with recreation uses. In Eastern Goleta Valley, the Tatum property (Pending Site No. 42 [Tatum]), located near Turnpike Road and Hollister Avenue, is owned by the Santa Barbara Unified School District and designated with the Proposed Public or Private Park/Recreation Facility Overlay, but zoned for residential use with a residential land use designation. There is a pending application in with the County to develop a housing project on this site.

Parks, Recreation and Trails Maps (PRT Maps)

The PRT Maps are an aspect of the Land Use Element. The PRT Maps consist of five maps adopted by the Board of Supervisors and which establish the envisioned comprehensive parks, recreation, and trails network for the unincorporated area. Specifically, the PRT Maps delineate existing and proposed parks, open areas, joint use facilities, on road trails, and off road trails countywide and in the

Montecito-Summerland-Carpinteria area, Goleta-Santa Barbara area, Lompoc area, and Santa Maria area. In addition, in 1997, the Board of Supervisors adopted amendments to the PRT Maps to eliminate the Orcutt Area from the Santa Maria Area PRT Map and adopt by reference the Orcutt Community Plan Parks, Recreation and Trails map of the Orcutt Community Plan. The goal of the PRT Maps is to provide a tool whereby informed land use decisions can be made with advanced knowledge of planned trail locations early in the County's discretionary review process. The lines which represent trails on the PRT Maps do not show exact locations of existing or proposed trails, and instead represent general corridors where trails exist or are proposed to exist. The PRT Maps also provide guidance on the designation of trails, the acquisition of proposed trails, and trail design standards.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979, republished in May 2009, and amended in August 2010) is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards. The Element provides information concerning geology, soils, seismicity, and fire and flood hazards of Santa Barbara County, and provides recommendations and criteria to aid in land use planning to ensure that future development will be compatible with the environment. Its overarching purpose is to reduce potential deaths, injuries, and damage to property caused by earthquakes, fires, geologic hazards, and other natural disasters. The following policies are relevant to the Project.

- **Geologic and Seismic Protection Policy 3**: The County shall ensure compliance with State seismic and building standards in the evaluation, design, and siting of critical facilities, including police and fire stations, school facilities, hospitals, hazardous material manufacture and storage facilities, bridges, large public assembly halls, and other structures subject to special seismic safety design requirements pursuant to the California Code of Regulations, Title 24, Part 2 California Building Code.
- **Fire Policy 3**: Fire Hazard Severity Zone Maps, as maintained by the California Department of Forestry and Fire Protection, shall be used to illustrate the official areas of Very High Fire Hazard Severity Zones (VHFHSZ) in the Local and State Responsibility Areas.
- **Fire Policy 5**: The County shall continue to require defensible space clearance around all structures in unincorporated Local Responsibility Areas pursuant to Public Resource Code Section 4291, and Government Code Sections 51175-51188.
- **Fire Policy 7**: The County should strive to maintain partnerships with tribal governments, state, local, and federal agencies to identify, prioritize, and implement fire prevention and protection measures in the County.

Coastal Land Use Plan

The Coastal Land Use Plan (CLUP) lays out the general patterns of development throughout the coastal areas of the unincorporated county. Its purpose is to protect coastal resources while accommodating land use development within the Coastal Zone. The other elements are applicable within the Coastal Zone; however, when there is a conflict, the CLUP takes precedence. The following policies are relevant to the proposed Project:

30250. (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed

areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

30254. New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this Division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal-dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

Development Policy 2-6: Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.

Community Plans

The County has adopted 10 community or area plans. Each community plan contains goals, policies, and standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. Community plans with specific policies related to public services and recreation that pertain to new residential or mixed use development associated with the proposed Project are detailed below.

Eastern Goleta Valley Community Plan:

The following policies from the Orcutt Community Plan are relevant to the proposed Project.

- **Policy SF-EGV-1.1:** The County shall ensure that required public services and facilities to meet the needs of development are constructed and operational concurrently with, or in advance of, the construction and operation of development.
- **Policy SF-EGV-1.2:** The County shall encourage developers to use innovative measures to mitigate the public service impacts from their developments in addition to standard in-lieu fees, including, but not limited, to payment of development impact fees; direct public service facility improvements; creation of public service facility benefit assessment districts, etc.
- **Policy SF-EGV-2.1**: In the interest of coordinated regional planning, the County shall continue to monitor and consider the planning, development and operations activities of adjacent entities to ensure that impacts to County public services and facilities are mitigated to the greatest extent feasible.
- **Policy SF-EGV-2.2:** The County should strive to ensure adjacent jurisdictions fully mitigate their public service and facility impacts, including the City of Goleta, City of Santa Barbara, and UCSB.

- **Policy SF-EGV-2.3:** The County shall continue to review regional projects to evaluate public service and facility impacts to Eastern Goleta Valley.

Fire

- **Policy FIRE-EGV-1.1:** The County shall support and pursue collaborative fuel management and wildfire protection programs for the City of Santa Barbara, the City of Goleta, and Eastern Goleta Valley to encourage fire hazard reduction and protection of natural resources.
- **Policy FIRE-EGV-1.2**: Fire hazards shall be minimized in order to reduce the cost of and need for increased fire protection services, while protecting environmental resources.
- **Policy FIRE-EGV-2.2**: All roads which provide access to structures and properties served by the County Fire Department shall be designed and constructed to Fire Department and County engineering standards or approved equivalent.
- **Policy FIRE-EGV-2.3**: Secondary access shall be a consideration in the location and design of development. Two routes of ingress and egress shall be required for discretionary development unless the County Fire Department waives or modifies this requirement. Routes of ingress and egress required by the Fire Department shall be open and unobstructed.
- **Policy FIRE-EGV-2.5:** The Planning and Development Department shall work with the County Fire Department to design, locate, and develop land use strategies for acquiring and constructing emergency access roads in the rural and urban areas to improve accessibility and evacuation in the event of wildfire.

Law Enforcement Services and Facilities

- **Policy POL-EGV-1.1**: The County should maintain a staffing level of law enforcement officers of at least one (1) officer per 1,200 people to meet or exceed the demand for service based on existing and future service populations as determined by the County Sheriff's Department.
- **Policy POL-EGV-1.2**: The County shall consider the publicly owned lands of the Calle Real Administration Campus and the Ben Page Youth Center properties as suitable locations for law enforcement facilities.

Emergency Services and Facilities

- **Policy ES-EGV-1.1:** The County shall continue to facilitate effective emergency response systems in the event of a community-wide emergency in Eastern Goleta Valley.

Parks, Recreation, Trails, and Open Space

- **Policy PRT-EGV-1.1:** Diverse outdoor and indoor recreational opportunities shall be encouraged to enhance Goleta's recreational resources and to ensure that current and future recreational needs of residents are met.
- **Policy PRT-EGV-1.2:** To enhance overall public health and well-being, recreation facilities shall be located, designed and constructed, as needed, to increase opportunities to play and exercise in Eastern Goleta Valley.

- **Policy PRT-EGV-1.3:** New public recreational resources shall be prioritized for underserved locations to increase equitable access to a range of recreation opportunities.
- **Policy PRT-EGV-1.4:** The County shall prioritize locating recreational resources in areas within walking or biking distance of residential and educational land uses.
- **Policy PRT-EGV-3.1**: County recreation resources shall be maintained and enhanced to best serve the users of the facility.
- **Policy PRT-EGV-3.2: (INLAND)** Tucker's Grove Park shall be maintained and enhanced.
- **Policy PRT-EGV-3.2: (COASTAL)** Public access and recreational opportunities at Goleta Beach County Parks shall be maintained and enhanced.
- **Policy PRT-EGV-3.3:** There shall be no motorized off-road recreational vehicle use on County-owned lands within Eastern Goleta Valley.
- **Policy PRT-EGV-4.1**: Acquisition and development of lands for pocket, neighborhood, and community parks should utilize vacant or underutilized lands near or adjacent to residential neighborhoods and educational facilities whenever possible.
- **Policy PRT-EGV-4.2**: Properties with the potential for maximum public use shall be considered a high priority in park acquisition decisions. Public use is maximized when the park locations:
    - Are highly accessible to many people (e.g., park along bike path or at trailhead or on heavily used transportation corridor).
    - Could be connected into network of multimodal transportation options and/or trails.
    - Provide a mix of recreational resources to serve a wide range of visitor demands (e.g., playgrounds near playing fields, or near a dog park, etc.).
- **Policy PRT-EGV-5.1:** In compliance with applicable requirements, all opportunities for public recreational trails within the general corridors adopted by the Board of Supervisors as part of the Parks, Recreation and Trails (PRT) maps of the County Comprehensive Plan (and this Community Plan) shall be protected, preserved and provided for upon approval of any development, subdivision and/or permit requiring any discretionary review or approval, except as referenced in Agricultural Element Policy IA.
- **Policy PRT-EGV-5.10:** The County shall actively pursue acquisition of public trails through exactions as part of development agreements and permitting, through negotiation with property owners for purchase or other transaction, through exchange for surplus County property as available, through acceptance of gifts and other voluntary dedications of easements, and/or through the use of incentives as developed through the revised Goleta Trails Implementation Study.
- **Policy PRT-EGV-7.1:** The County shall pursue the acquisition of vacant properties for potential use as public parks or open spaces, where the purchase would serve as buffer zones for residential or commercial development, provide usable recreation space, or preserve wildlife habitats and migration corridors or sensitive biological resources.

- **Policy PRT-EGV-7.2:** The County shall work to acquire and implement additional public coastal access.
- **Policy PRT-EGV-7.3**: Acquisition or designation of property for public open space and passive recreation shall strive to incorporate the following features:
    - Significant natural and ecological resources
    - Environmentally sensitive habitat areas
    - Visual resources
    - Significant physical constraints
    - Opportunities for public coastal access and parking
- **Policy PRT-EGV-7.5:** The County shall work with South Coast agencies, including cities, districts, or other interested organizations, to site, acquire, and implement public open space.

Orcutt Community Plan

The following policies from the Orcutt Community Plan are relevant to the proposed Project.

Fire Protection

- **Policy FIRE-O-1:** The County shall strive to provide adequate fire protection service for the residents of Orcutt.
- **Dev-STD FIRE 2.2:** Emergency access. The County shall require two routes of ingress and egress for development unless waived by the Fire Department. Emergency access and egress roads are not required to be paved or meet width standards for normal roadways.

Libraries

- **Policy LIB-O-1:** The County shall strive to provide adequate library services for residents within the OPA.

Parks, Recreation, Trails, and Open Space

- **Policy PRT-O-1:** Diverse passive and active recreational activities shall be developed in Orcutt.
- **Policy PRT-O-2:** Development of parks shall be consistent with the community's existing semi-rural character and landscaping.
- **Policy PRT-O-3**: Regional retention basins shall serve a dual flood control/recreational use where feasible and appropriate given flood control constraints and appropriate levels of natural resource protection.
- **Policy OS-O-1:** When considering approval of development projects within or adjacent to areas identified for potential public open space (see Table 21), the County shall review the appropriate mix of public and/or private open space, and to the maximum extent feasible require dedication of contiguous areas identified as a priority for public acquisition as public open space based on the following criteria:

  - location within designated open space corridors and proximity of adjacent open space;
  - the criteria and intent of the PRD zone district; and
  - demonstration of rough proportionality between the level of permitted development, its associated impact, and the open space dedication, consistent with applicable laws.

- **Policy OS-O-3**: Private open space within designated open space corridors shall be sited, designed, and managed to protect the natural resources and/or recreation potential of these corridors, consistent with the Open Space, Park, Recreation & Trails, and Biological Resource policies of this Plan.
- **Policy OS-O-4**: Development adjacent to, or within designated open space areas, shall be sited and designed to protect and enhance the natural resources of these areas, and accommodate appropriate recreation opportunities as identified in the Parks, Recreation & Trails section of this Plan.
- **Policy OS-O-6:** The County should acquire the open space lands prioritized for public acquisition through dedication by working with property owners and interested groups, or through purchase. Where dedication is required, the County shall offset fees as required. If dedication is not required, the County may consider purchase, use of the TDC program or permitting the property to remain as private open space, consistent with the standards of this plan for natural resource protection and provision of passive and active recreation opportunities.
- **Policy OS-O-7**: To the maximum extent feasible, the County shall set Quimby and other fees at sufficient levels to permit construction and acquisition of the parks, open space, trails, and landscape improvements identified in the Orcutt Community Plan, in the proposed Public Infrastructure Finance Program and in reports/recommendations from the proposed Citizens Parks/Open Space Committee. Where the costs of these proposed improvements exceed funds generated by the fee(s), the County should pursue grants, work with community organizations, consider assessments agreed to by the residents, or other appropriate mechanisms.
- **Policy OS-O-8:** Property outside of designated Open Space areas shall be available for development consistent with other applicable policies in this Plan.
- **Policy OS-O-9:** The County shall encourage restoration and enhancement of degraded habitats within natural undeveloped open space areas.

Law Enforcement and Police Protection

- **Policy PP-O-1:** The County shall strive to provide adequate police protection for residents within the OPA.

Santa Ynez Valley Community Plan

The following policies from the Santa Ynez Valley Community Plan are relevant to the proposed Project.

Parks, Recreation, and Trails

- **Policy PRT-SYV-1:** The County shall strive to provide new recreation and park facilities and new trails. New trails shall be limited to nonmotorized vehicle use and shall be considered on public and private property including public roads.

Fire Protection

- **Policy FIRE-SYV-1:** The County shall strive to ensure that an adequate number and type of fire station, equipment and personnel be maintained by periodically evaluating population growth, level of service requirements, response time, and fire hazards throughout the planning area.

Law Enforcement and Police Protection

- **Policy PP-SYV-1:** The County shall strive to provide adequate police protection for residents within the SYVCPA.

Schools

- **Policy S-SYV-1:** The County shall work with the School Districts in the Santa Ynez Valley to ensure that public education needs are met.

Multi-Jurisdictional Hazard Mitigation Plan

The MJHMP was prepared by the SBCOEM in 2022 to comprehensively identify, evaluate, and mitigate the known hazards that Santa Barbara County faces. The MJHMP is used by local emergency management teams, decision-makers, and agency staff to implement needed mitigation to address known hazards. The MJHMP can also be used as a tool for all stakeholders to increase community awareness of local hazards and risks and provide information about options and resources available to reduce those risks. The MJHMP describes historical hazard events and the future probability of these hazards and their impact on communities. Vulnerability assessments summarize the identified hazards' impact on critical infrastructure, populations, and future development. The MJHMP identifies goals and a wide range of hazard mitigation actions to achieve those goals (County of Santa Barbara 2022b; SBCFD and CAL FIRE 2021).

Santa Barbara Operational Area Mutual Aid Plan

A cornerstone of the fire protection system in Santa Barbara County is the Santa Barbara Operational Area Mutual Aid Plan, which is updated regularly. In Santa Barbara County, no single local fire agency can muster the resources necessary to mitigate large-scale emergencies on an ongoing basis, such as large wildfires, hazardous materials responses, and urban search and rescue responses. The California Fire Master Mutual Aid Agreement requires each county to have a mutual aid plan. Because several cities and unincorporated areas of the county provide fire protection services, the Santa Barbara Operational Area Mutual Aid Plan becomes an essential mechanism for coordinating fire protection resources.

Mutual Aid takes on several different forms. For initial attack purposes, mutual aid and automatic aid facilitate the day-to-day responses where the closest resources are dispatched regardless of jurisdictional boundaries. Because several of the agencies maintain their separate dispatch centers, any aid request must be relayed between dispatch centers. Within Santa Barbara County agreements

have been made between all agencies concerning dispatch protocols and dispatch procedures (automatic aid and mutual aid). In addition, Santa Barbara County also has agreements with Kern County, San Luis Obispo County, and Ventura County.

If an incident requires reinforcement resources that cannot be met through local mutual aid agreements, the California Fire Service and Rescue Emergency Mutual Aid Plan is followed. All fire service entities in California are signatories to the California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan.

Community Wildfire Protection Plans

A Community Wildfire Protection Plan (CWPP) is a planning and funding prioritization tool created by the Healthy Forests and Restoration Act of 2003 as an incentive for communities to engage in comprehensive forest and fire hazard planning and help define and prioritize local implementation and funding needs. CWPPs are generally developed by local governments or other entities with assistance from state and federal agencies and in collaboration with other interested partners. This provides communities with a tremendous opportunity to influence where and how federal agencies implement fuel reduction projects on federal land, as well as how additional federal funds may be distributed for projects on non-federal lands. CAL FIRE also provides funding opportunities for projects or activities that may be identified in CWPPs (Governor's Office of Planning and Research [OPR] 2022).

County Fire Protection Standards

SBCFD employs the following two standards for the provision of fire protection services (County of Santa Barbara Planning and Development Department [P&D] 2011):

1. A firefighter-to-population ratio of one firefighter on duty 24 hours a day for every 2,000 in population is considered "ideal," although a ratio (including rural areas) of one firefighter per 4,000 in population is the maximum population that can be adequately served. Additionally, a ratio of one engine company per 16,000 population, assuming four firefighters per station, represents the absolute maximum population that the SBCFD has determined can be adequately served by a four-person crew.
2. A 5-minute response time in urban areas. This incorporates the following National Fire Protection Association (NFPA) response-time objectives:
    a. One minute for turnout time
    b. Four minutes or less, for the arrival of the first-arriving engine company

SBCFD strives to obtain a minimum of four firefighters in each engine company. This standard is set by the NFPA guidelines, which state that engine companies shall be staffed with a minimum of four on-duty personnel. The most recently released 2020 NFPA standards were also revised to include a requirement for fire stations to establish an objective of a second properly staffed four-person unit to arrive within 360 seconds (i.e., 6 minutes) or less (NFPA 2020). This is especially important in unincorporated and rural areas, due to the longer response times from outlying fire stations. Cal-OSHA requires that a minimum of two firefighters, operating as a team, conduct interior firefighting operations. In addition, a minimum of two firefighters must be positioned outside and remain capable of rapid intervention and rescue if needed. This is also known as the State of California's "Two-In, Two-Out" law (29 Code of Federal Regulations [CFR] §1910.134[g][4]). If there are only three

firefighters assigned to a fire engine, the engine company must wait for additional backup to arrive before being able to engage in interior firefighting operations to comply with Cal-OSHA regulations.

County Code of Ordinances

Chapter 10 – County Building Code

Chapter 10 of the County's Code of Ordinances is the Santa Barbara County Building Code (Ord. No. 4822, 1-17-2012). The code addresses geological, topographical, and climatic conditions in the county, including extreme weather conditions, firefighting resources, flammable vegetation, High Hazard Areas, extreme wind conditions, and seismic shaking, and the minimum standards to safeguard and protect life, buildings, and structures within the county. Per the County's Building Code Construction Standards, residential development within designated high-fire hazard areas must abide by specific construction standards. Where appropriate, all of the required structural safeguards must be graphically depicted on building plans submitted before issuance of a building permit. The safeguards must be inspected and approved by SBCFD inspectors before occupancy.

Chapter 15 - Fire Prevention / Fire Code

Chapter 15 of the County's Code of Ordinances (Ord. No. 5170, 12-6-2022) is titled *Fire Prevention* and serves as the County's Fire Code. This ordinance incorporates the CFC by reference and, as a result, implements the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations.

This chapter of the County's Code of Ordinances includes development standards developed by SBCFD to provide for and maintain adequate and unobstructed emergency access for fire department apparatus and personnel to buildings, structures, hazardous occupancies, or other premises. The standards apply to newly proposed private roads and driveways that are used to provide access to dwellings and structures for emergency access. They include requirements for minimum roadway width, turnarounds, fire access, vegetation clearing around roadways to be used for firefighting access purposes and building and construction standards. The standards also provide limitations for the maximum length of dead-end-roads allowable, defensible space requirements, and automatic sprinkler systems, among others. Multifamily development projects may have additional access requirements beyond what is included in this standard.

The County's Code of Ordinances also includes an impact mitigation fee for new development projects within the SBCFD service area. To mitigate impacts caused by new development projects within SBCFD's service area, a fire facility, apparatus, and equipment development impact mitigation fee may be necessary. The fee is needed to finance fire facilities, apparatus, and equipment necessary to serve new development and to assure new development projects pay their fair share for these facilities. These fees are outlined in the County's Development Impact Mitigation Fee Program and are required to be paid on or before the final building permit inspection.

Article IV. Park and Recreation Dedication and Fees

Ordinance Number 4317: General Provisions

Sec. 21-100. - Findings.

(a) Certain types of new development projects and subdivisions within the county can have impacts on public park and recreational facilities.

(b) The State of California, through the enactment of Government Code Section 66477 (Quimby Act) has decreed that local agencies may require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative map or parcel map.

(c) New development and subdivisions within Santa Barbara County should be required to mitigate their park and recreation facility impacts by constructing, or financing the construction of, the park and recreation facilities needed to serve new development and subdivisions.

(g) Based upon the principles and standards of the recreation element of the Santa Barbara County general plan, it is hereby found and determined that the public interest, convenience, health, welfare, and safety require that 0.0128 acres of property per dwelling unit be devoted to neighborhood and community park and recreational purposes, exclusive of and in addition to school lands used cooperatively for recreational purposes. The acres per dwelling unit factor is based on 4.7 acres required park and recreation acres per one thousand persons in accordance with the county general plan and the average county population density of 2.72 persons per dwelling unit as per the 1990 census.

(h) The board of supervisors further finds that the public interest, convenience, health, welfare and safety will be promoted by the adoption of park and recreation facility fees (Quimby fees) for the construction, expansion and/or improvement of existing park and recreation facilities, the need for which is caused by new development and subdivisions.

Ordinance Number 4348: Development Mitigation Fees for Parks in Connection with Residential Development Projects which do not Involve the Subdivision of Land

Sec. 21-122.1. - Findings.

(a) In order to implement the goals and objectives of the Santa Barbara County comprehensive plan and to mitigate park impacts caused by new residential development projects which do not involve the subdivision of land within the unincorporated portions of Santa Barbara County, a development mitigation fee for parks is necessary. The fee is needed to finance park and recreation facilities necessary to serve new residential development projects which do not involve the subdivision of land and to assure that new residential development projects which do not involve the subdivision of land pay their fair share for these facilities.

(b) Title 7, Chapter 5, Section 66000 et seq. of the California Government Code provides that development mitigation fees for parks may be enacted and imposed on development projects. The board of supervisors finds and determines that:

1. New residential development projects which do not involve the subdivision of land cause the need for construction, acquisition, expansion and/or improvement of park

and recreation facilities within the recreation demand areas of the County of Santa Barbara.

2. Funds for construction, acquisition, expansion and/or improvement of park and recreation facilities are not available to accommodate the needs caused by new residential development projects which do not involve the subdivision of land, which will result in inadequate park and recreation facilities within the recreation demand areas of the County of Santa Barbara.

(c) …In establishing development mitigation fees for parks, the board of supervisors finds the fees are

1. consistent with the Santa Barbara County comprehensive plan/land use element,
2. compatible with current Quimby fee rates, and
3. based on the average household size for second units, mobile homes, apartments, and duplexes.

Santa Barbara County Land Use and Development Code

The County Land Use and Development Code (LUDC) provides standards, regulations, and procedures on land use and development planning throughout the unincorporated county. Select sections are excerpted below to represent key provisions. Similar provisions are contained within the Montecito LUDC and Article II, Coastal Zoning Ordinance.

Section 35.82.060 – Conditional Use Permits and Minor Conditional Use Permits

E. Findings required for approval of Conditional Use Permits other than Conditional Use Permit applications submitted in compliance with Chapter 35.38 (Sign Standards). A Conditional Use Permit application shall be approved or conditionally approved only if the review authority first makes all of the following findings, as applicable.

1. Findings required for all Conditional Use Permits:

- There will be adequate public services, including fire protection, police protection, sewage disposal, and water supply to serve the proposed project.

Section 35.82.080: Development Plans:

E. Findings required for approval.

A Development Plan application shall be approved or conditionally approved only if the review authority first makes all of the following findings, as applicable:

1. Findings for all Preliminary or Final Development Plans.

d. There will be adequate public services, including fire and police protection, sewage disposal, and water supply to serve the proposed project.

3.13.4 Environmental Impact Analysis

This section discusses the public services and recreation impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed or described where they are infeasible and the residual impact after mitigation is determined.

3.13.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to public services and recreation if it would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

   i) Fire protection

   ii) Police protection

   iii) Schools

   iv) Parks

   v) Other public facilities

b. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or

c. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2021) does not provide any thresholds for significant impacts on fire protection services, law enforcement and police protection services, or parks and recreation. Instead, the County relies on analysis and consideration of impacts with regard to significance criteria for these resources based on CEQA Guidelines, as well as questions from the County's Initial Study Checklist, as follows.

- Would the project result in a need for new or altered police protection and/or healthcare services?
- Would the project conflict with established recreational uses of the area?
- Would the project conflict with biking, equestrian, and hiking trails?

- Would the project result in substantial impacts on the quality or quantity of existing recreational opportunities (e.g., overuse of an area with constraints on number of people, vehicles, animals, etc., which might safely use the area)?

Further, although the County's *Environmental Thresholds and Guidelines Manual* does not contain a threshold for parks and recreation impacts, the County Board of Supervisors has also established a minimum standard ratio of 4.7 acres of public parkland per 1,000 residents in the 1980 Land Use Element, Recreation Section.

The County's *Environmental Thresholds and Guidelines Manual* also provides local criteria for determining whether a project may have a significant effect on schools. Accordingly, a project may create a significant environmental impact on schools if it would result in:

- The generation of a sufficient number of students to require an additional classroom. This assumes 29 students per classroom for the elementary/junior high students, and 28 students per classroom for high school students, based on the lowest student per classroom loading standards or the state school building program. This threshold is to be applied in those school districts which are currently approaching, at, or exceeding their current capacity.

Neither the County's *Environmental Thresholds and Guidelines Manual n*or the County's Initial Study Checklist contain thresholds relating to library services.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus a 15 percent buffer for lower- and moderate-income units. As a result, the impact analysis provided below does not evaluate impacts on public services and recreation at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for the Housing Element Update to affect public services and public parks and recreational facilities within the county. Wherever possible, illustrative examples are provided to describe particular areas of the county where the implementation of the Housing Element Update would create impacts related to public services and recreation.

As described in Chapter 3, *Environmental Impact Analysis*, the implementation of the proposed Project could allow for a maximum potential buildout of up to 34,558 new residential units under a worst-case scenario. Using the U.S. Census Bureau's 2020 county average household size of 2.89 people, the estimated increase in population under the proposed Project is approximately 99,873 persons. (See also Section 3.12, *Population and Housing.*) The population would be distributed relative to the sites inventory prepared for the Housing Element Update, with more than 52 percent in the South Coast HMA, including Eastern Goleta Valley, and 48 percent in the North County HMAs. Of the portion of future population potential in the North County, approximately 78 percent would be located in the Santa Maria HMA, including Orcutt. These population estimates are used to evaluate the potential increase in service demand from the proposed Project on public services and recreation. However, it should be noted that as described in Chapter 2, *Project Description*, the County Board of Supervisors would eliminate some sites and select the number of housing sites necessary to accommodate RHNA plus a 15 percent buffer for lower- and moderate-income households.

Table 3.13-12. Estimated Population Growth under the Proposed Project by HMA

	South Coast	North County			
		Lompoc Valley	Santa Maria Valley	Santa Ynez Valley	Cuyama Valley
Total	52,141	2,662	37,108	2,630	5,332
Total by RHNA Region	52,141	47,731			
Total Unincorporated County	99,873				

Notes:
Section 3.12, *Population and Housing* provides additional details regarding projected population growth.

Further, this analysis considers the potential increase in school-age children as a component of the population growth projection. As described in the discussion of *Public Schools* in Section 3.13.2.1, *Public Services* above, based on the countywide average number of school children (i.e., ages 5 to 18), the number of school-aged children per household countywide is 0.44 students per household (U.S. Census Bureau 2022). To provide a reasonably conservative analysis, this U.S. Census Bureau data was used to inform future enrollment projections related to potential future development enabled under the proposed Project for each HMA.

Table 3.13-13. Estimated Increase in Enrollment under the Proposed Project by HMA

	South Coast	North County			
		Lompoc Valley	Santa Maria Valley	Santa Ynez Valley	Cuyama Valley
Total	7,962	406	5,666	402	814
Total by RHNA Region	7,962	7,289			
Total Unincorporated County	15,250				

The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This programmatic analysis is supported by the review of existing adopted plans, public databases, and recent studies, to assess potential impacts relating to public services and recreation. For example, the Operational Enhancement Update for SBCFD (Citygate 2020) and the Countywide Operational Performance Review for the Santa Barbara Sheriff's Office (KPMG 2020) were analyzed for relevance to the proposed Project. Current school enrollment data is provided by the Santa Barbara County Education Office (County of Santa Barbara 2022b) and parks and recreation information is provided by the County Parks Division (County Parks 2023). This section is derived from the current and projected staffing and equipment levels, performance reports and standards, enrollment levels of various public services in the county, and parkland acreages. This included coordination with County Parks to consider the draft inventory of public parkland currently under preparation for the Countywide Recreation Master Plan, a cumulative project. (Refer also to Chapter 3, *Environmental Impact Analysis* for a description of cumulative projects.) The existing public parkland is evaluated in this analysis for its existing recreational resource value as a baseline for this Program EIR.

3.13.4.2 Project Impacts

Table 3.13-14 provides a summary of the proposed Project's impacts related to public services and recreation. A detailed discussion of each impact follows.

Table 3.13-14. Summary of Public Services and Recreation Impacts

Public Services and Recreation Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact PSR-1. The proposed Project could result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts.	Potentially significant	No mitigation feasible	Significant and unavoidable impacts
Impact PSR-2. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered law enforcement and police protection or emergency medical and healthcare facilities, the construction of which could cause significant environmental impacts.	Insignificant	None required	Insignificant impacts
Impact PSR-3. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts.	Insignificant	None required	Insignificant impacts
Impact PSR-4. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts.	Insignificant	None required	Insignificant impacts
Impact PSR-5. The proposed Project could increase the use of existing parks and recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or could require the construction or expansion of recreational facilities which might have an adverse impact on the environment.	Potentially significant	MM LU-1 (Amendments to Design Residential [DR] Zoning)	Significant and unavoidable impacts
Cumulative Impacts	Potentially significant	MM LU-1 (Amendments to Design Residential [DR] Zoning)	Significant and unavoidable impacts

Impact PSR-1. The proposed Project could result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts.

Fire Protection Staffing and Service Ratios

Future new residential and mixed use development enabled under the proposed Project could foreseeably increase the demand for SBCFD's existing fire stations, including staffing and equipment (Table 3.13-2). As described in 3.13.2.1, *Public Services*, Citygate's operational enhancement update

to the 2012 fire services deployment and departmental performance audit found SBCFD's existing response apparatus or vehicles to be appropriate to protect against the hazards likely to impact the fire service areas (Citygate 2020). Additionally, Citygate found the existing daily staffing to be sufficient; no single fire unit or station area is approaching workload saturation (Citygate 2020).

As described in Section 3.13.1, *Existing Setting,* SBCFD's current firefighter-to-population ratio is one firefighter for approximately every 711 persons, and one engine company for every 9,682 persons, which is within the established ideal standard of one firefighter on duty for every 2,000 persons. An increase in population of up to 99,873 persons in the unincorporated county (Table 3.13-12) would alter ratios so that the fire-fighter-to-population ratio would be one firefighter for approximately every 1,119 persons, and one fire station for approximately every 15,230 persons. However, both of these service level standard ratios would remain within SBCFD's ideal standard of one firefighter on duty for every 2,000 persons and one engine company per 16,000 persons.

Response Times

While SBCFD's service ratios would remain within SBCFD's standards, the countywide response time from 9-1-1 being answered is 2:22 minutes longer than County best practices. Citygate found that this is primarily due to: 1) existing road network design/limitations (e.g., poor road layout, narrow and winding roads); and 2) the size of some areas served by the individual stations (i.e., almost all of SBCFD's "first-in" districts include both the Urban Area and large Rural Area). Further, Citygate qualified that some SBCFD stations have existing temporally compacted call volume during peak hours of the day that results in multiple calls at the same time. In those events, the next closest engine takes the second call, which results in a slower response time given an assumed greater distance to travel. As an example, Fire Station No. 13 in Eastern Goleta Valley serves the large and diverse area that is bordered to the north by the LPNF, to the south by the Pacific Ocean, to the east by the City of Santa Barbara, and the west roughly by Maria Ignacio Creek in the south and San Antonio Creek towards the north. The service area of this station also includes Paradise Road, the San Marcos mountain top communities, and a long stretch of Hwy 154. The large service area and removed communities result in the average response time for Fire Station No. 13 of approximately 10 minutes. To address existing long-standing deficiencies in response times to some areas of the county, SBCFD and the City of Goleta have planned for and are in the process of preparing for the construction of Fire Station No. 10 in the City of Goleta. Additionally, SBCFD and the County are actively implementing Citygate's recommendations and are in the process of designing a new Fire Station No. 25 in Orcutt to reduce response times in that community. Once constructed, these two new fire stations would improve service and response times and would serve future development enabled under the Housing Element Update in these areas.

However, Citygate did not contemplate the increased demand on SBCFD from potential future residential and mixed use development enabled under the proposed Project. This development would substantially increase the service area of some stations, in some cases by hundreds of acres, and would locate new potential housing in areas that could be outside of the target response time zone, locate new housing in areas on the edge of existing developed neighborhoods, expand the physical area of urban development requiring fire protection services, and/or locate housing in areas that would otherwise be difficult to access.

The majority of the potential rezone sites for the proposed Project would be located in urban and developed areas and would generally be located within 2 miles of an existing fire station. For example, the rezone sites within the South Patterson Agricultural Area, which total approximately 200 acres,

are located between 0.5 and 3.5 miles from Fire Station Nos. 11, 12, and 14. However, Fire Stations No. 12 and 14 are located to the north of U.S. Highway 101, and Fire Station No. 11 is located to the westeast of the Santa Barbara Airport. The location of these fire stations relative to the potential rezone sites in Eastern Goleta Valley could make access challenging, particularly during the peak hours when U.S. Highway 101, SR 217, and arterials such as Hollister Avenue experience higher traffic volumes. This is evidenced by the existing response times at these stations (Table 3.13-3). As an additional example, Rezone Site No. 12 (St. Vincent's – East) and No. 13 (St. Vincent's – West) are located approximately 2 miles from Fire Station No. 13. While the potential rezone sites are located near the existing fire station, with a direct route along a major Hollister Avenue and SR 154, during the peak hours access can be difficult, particularly given that the access to these sites is limited to a single direction from the south.

Further, some of the existing vacant sites in the sites inventory prepared for the Housing Element Update are not located in the existing Urban Area. These vacant sites are located in the foothills but are still served under existing conditions by SBCFD's existing fire stations. It is anticipated that future development of these sites with single-family homes, as allowed under existing zoning regulations, would continue at a similar rate to existing conditions. However, the development of residential units on these vacant parcels could experience response time issues given that they are generally located along the margins of the existing service areas, and responses to these sites could take longer than average. Further, for some smaller communities in the county, vacant sites in the rural area could also be compromised with regard to scale of the response (e.g., number of responders and available equipment). For instance, Fire Station No. 24 in Los Alamos has a relatively short travel time to calls within the township; however, in the event of a structure fire, SBCFD may experience a delay in getting a full structure response team on the scene promptly, despite a short initial response time for the first-arriving engine company.

As described in Section 3.1, *Aesthetics and Visual Resources,* Section 3.4, *Biological Resources*, and Section 3.8, *Hazards and Hazardous Materials*, the implementation of mitigation measures to avoid physical and planning constraints could substantially reduce the developable acreage and higher-density housing projects (e.g., 20 units per acre or more) may need to propose taller multiple-story development projects of four stories or more to meet maximum and perhaps even minimum densities to achieve the Housing Element Update's goals, policies, and programs. A 100-foot ladder would be necessary to reach those heights during a fire or other emergency response. Based on personal communication with Division Chief, Robert Hazard (2023), SBCFD has truck companies in Goleta and Solvang with ladders that can reach those heights. However, SBCFD does not have that capability in Los Alamos, Lompoc, or Cuyama Valley. SBCFD also does not have a truck company in Orcutt, but the Santa Maria City Fire Department has one that can be made available through mutual aid. Therefore, taller development enabled under the Housing Element Update is not anticipated to generate a need for new fire trucks equipped with taller ladders or associated mandates for the improvement of facilities to accommodate such equipment.

Given the increase in development and service population for the existing stations and the fact that the average countywide response time already exceeds best practices, new or expanded fire protection facilities may be required. To mitigate impacts caused by new development projects within SBCFD's service area, Chapter 15 of the County's Code of Ordinances requires developers to pay impact mitigation fees to finance fire facilities, apparatus, and equipment necessary to serve new development and to ensure new development projects pay their fair share for these facilities. These fees are outlined in the County's Development Impact Mitigation Fee Program and are required to be paid on or before the final building permit inspection. These existing development fees would ensure

that appropriate improvements are identified and adequately funded to address the increase in demand for services generated by the Project. Where these fees identify and fund improvements, the expansion of existing fire protection facilities or the construction of new fire protection facilities could result in significant and unavoidable impacts on the environment. For example, the Final EIR for Fire Station No. 10, to be operated by SBCFD in the City of Goleta, identified significant and unavoidable environmental effects to aesthetics and visual resources, and noise (City of Goleta 2018). Where required, the expansion of existing fire protection facilities or the construction of new fire protection facilities would be subject to environmental review under the CEQA process to ensure direct impacts of specific new or expanded stations would be mitigated to the greatest extent feasible. If such a project is proposed, the Lead Agency under CEQA would be the County or the relevant local jurisdiction, who would be responsible for conducting CEQA review.

However, even with payment of development impact fees to fund improvements to mitigate impacts associated with inadequate fire protection services and response times, it is unlikely that necessary improvements could be feasibly implemented to adequately mitigate impacts associated with increased demand for service and fire protection response times enabled under the proposed Project. It cannot be guaranteed that necessary improvements (e.g., new fire stations) are implemented in a reasonable timeframe to ensure adequate service is achieved for future residential and mixed use development enabled under the Housing Element Update during the 8-year planning horizon. Therefore, mitigation is considered infeasible and impacts to fire protection services resulting from the proposed Project are considered *significant and unavoidable.*

Impact PSR-2. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered law enforcement and police protection or emergency medical and healthcare facilities, the construction of which could cause significant environmental impacts.

The proposed Project could result in a population increase of up to 99,873 persons in unincorporated areas of the county. This additional population would likely increase the demand for law enforcement and police protection and emergency medical and healthcare services, potentially affecting staffing levels, calls for service, response times, and new equipment and facility needs. However, given that buildout and development would be distributed incrementally across the planning horizon of the proposed Project, increased demand for law enforcement and police protection and emergency medical and healthcare facilities would be gradual and changes to staffing and equipment would be made through the annual budget planning process, as further described below.

Staffing, Equipment, and Facility Needs

As discussed in Section 3.13.2.1, *Public Services,* the Sheriff's Office currently has a ratio of one police officer for approximately every 769 persons, or approximately 1.5 officers for every 1,200 persons. The additional population generated as a result of the proposed Project would create a new officer-to-population ratio of one police officer for approximately every 1,153 persons, or 1.04 officers for every 1,200 persons. The Eastern Goleta Valley Community Plan establishes a standard staffing level of at least one officer per 1,200 persons (Policy POL-EGV-1.1). The Orcutt Community Plan similarly states that the County's preferred service ratio standard is one officer per 1,200 persons. Even with the highest potential population increases enabled under the proposed Project, the ratio of officers-to-population under the proposed Project would remain consistent with County policy and the preferred service ratio. Therefore, future residential and mixed use development enabled under the proposed Project would not create a below-average ratio of officers to population, and existing

Sheriff's Office employment levels would meet the needs of existing and future residents. Given Sheriff's Office staffing and facilities are considered to remain adequate, implementation of the Housing Element Update is not considered to result in a need for new or expanded facilities for law enforcement and police protection, and no significant environmental impacts would occur.

Further, while the estimated increase in population under the Housing Element Update is highly conservative, any future demand for additional police personnel or equipment as a result of the proposed Project would be funded by the County's annual budget review and allocation, as well as a variety of federal or state funds and grants. While not anticipated, the construction or expansion of any new or existing law enforcement and police protection facilities would be subject to environmental review, which would help to reduce adverse environmental impacts. Therefore, the adequacy of current Sheriff's Office staffing and facilities, in addition to the ability for additional budget allocations relating to any needed facilities or staff members, means that impacts relating to law enforcement and police protection services would be *insignificant*.

Further ambulance service and healthcare facilities are privately governed but are continually monitored by SBCEMSA and SBCPHD to ensure adequate service is being provided to county residents. If ambulance and health services become inadequate as determined by SBCEMSA and SBCPHD such that new or expanded facilities are needed, the construction of such facilities could result in environmental impacts. Where required, the expansion of existing facilities or the construction of new facilities would be subject to environmental review under the CEQA process to ensure direct impacts of specific new or expanded stations would be mitigated to the greatest extent feasible. If such a project is proposed, the Lead Agency under CEQA would be the County or the relevant local jurisdiction, who would be responsible for conducting CEQA review. Implementation of the proposed Project and the increase in population countywide is therefore not considered to result in a substantial need for new or improved emergency medical and healthcare facilities, such that significant environmental impacts would occur. Impacts are considered *insignificant.*

Impact PSR-3. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts.

The proposed Project could increase the population of the county by up to 99,873 people (Table 3.13-12), including 15,250 additional students across all school districts in the county (Table 3.13-13). This countywide increase in enrollment would result in an average of 1,906 additional students per year over the 8-year planning horizon of the proposed Project. It is important to note that, as described in Chapter 3, *Environmental Impact Assessment*, this Program EIR analyzes total maximum buildout potential, which represents a worst-case scenario. Additionally, as previously described in *Methodology,* this analysis also assumes a conservative ratio of school-aged children per household based on U.S. Census Bureau data for Santa Barbara County (U.S. Census Bureau 2022).

Table 3.13-15. Estimated Additional Students Under the Project

	South Coast	North County			
		Lompoc Valley	Santa Maria Valley	Santa Ynez Valley	Cuyama Valley
Current Enrollment (2022-2023)	20,458	9,514	33,365	2,652	300
Total Current Enrollment	**66,289**				
Increase in Enrollment Generated by the Proposed Project	7,961	406	5,666	402	814
Total Increase in Enrollment Generated by the Proposed Project	**15,250**				
Total Student Enrollment Under the Proposed Project (by 2031) by HMA	28,420	9,920	39,031	3,054	1,114
Total Student Enrollment Under Proposed Project (by 2031) by RHNA Region	28,420	53,119			
Total Unincorporated County	**81,539**				

As shown in Table 3.13-15, the additional students generated as a result of the increase in population under the proposed Project could exceed the existing capacities of a number of the existing school districts. Several individual school districts are relatively small (e.g., Cold Spring in the South Coast, Blochman Union in Santa Maria, Ballard and Vista Del Mar Union in Santa Ynez, and Cuyama Joint Unified in Cuyama). Increases in enrollment within any of these small districts are likely to result in the need for additional facilities (e.g., portable or permanent classrooms) and/or additional teachers to limit the increases in classroom size. However, except for the potential rezone sites, examples of which are discussed further below, it is too speculative to describe what specific districts would experience increases in enrollment and when these increases would occur as a result of the proposed Project. Therefore, because residential and mixed use development has been distributed by HMA, this analysis considers the increase in student enrollment associated with maximum buildout and compares it to the total capacity within the HMA, as identified in developer fee justification studies and/or personal communications with district staff.

As shown in Table 3.13-16, when considered together, the school districts within the South Coast, Santa Ynez Valley, and Lompoc Valley could accommodate the anticipated increase in student enrollment. As described in further detail below for the potential rezone sites, individual school districts could still experience exceedances in capacity. For example, Goleta Union could experience increases in enrollment associated with the buildout of the South Patterson Agricultural Area and the San Marcos Agricultural Area that could exceed the capacity of the school district individually, including El Camino Elementary School and Hollister Elementary School in Eastern Goleta Valley. Similarly, as previously described, smaller districts such as Ballard and Vista Del Mar Union in Santa Ynez Valley could also experience exceedances in capacity. However, existing capacity throughout the region could accommodate overflows in the resulting student population through intra- and interdistrict transfers and enrollment.

In contrast, the existing enrollment at each of the five school districts in the Santa Maria Valley is already at or exceeds their existing capacity. As such, it is foreseeable that the existing school facilities could not accommodate the new student enrollment without the expansion or the construction of new school facilities. Similarly, while an existing capacity has not been identified for Cuyama Joint Unified, the increase in student enrollment within this district would be more than doubled. With no other

districts in the Cuyama Valley, it is foreseeable that existing school facilities could not accommodate the new student enrollment without the expansion or the construction of new school facilities.

Table 3.13-16. Estimated Additional Students Under Project

HMA (School District)	Current Enrollment	Increase in Enrollment under the Proposed Project	Total Enrollment under the Proposed Project	Capacity	Total Capacity Exceeded?
South Coast	**20,458**	**7,961**	**28,420**	**28,628**	**NO**
Cold Spring	193	--	--	N/A	--
Goleta Union	3,416	--	--	4,976	--
Hope	839	--	--	1,391	--
Montecito Union	353	--	--	550	--
Santa Barbara Unified	13,647	--	--	18,725	--
Carpinteria Unified	2,010	--	--	2,793	--
Santa Maria Valley	**32,141**	**5,666**	**37,807**	**29,913**	**YES**
Blochman Union	191	--	--	279	--
Guadalupe Union	1,279	--	--	1,214	--
Orcutt Union	4,717	--	--	4,718	--
Santa Maria-Bonita	16,703	--	--	16,648	--
Santa Maria Joint Union	9,251	--	--	7,054	--
Santa Ynez Valley	**2,652**	**402**	**3,054**	**3,232**	**NO**
Ballard	118	--	--	150	--
Buellton Union	519	--	--	645	--
College	367	--	--	625	--
Santa Ynez Valley Union	853	--	--	959	--
Los Olivos	163	--	--	N/A	--
Solvang	593	--	--	651	--
Vista Del Mar Union	39	--	--	N/A	--
Lompoc Valley	**9,514**	**406**	**9,920**	**11,168**	**NO**
Lompoc Unified	9,514	--	--	11,168	--
Cuyama Valley	**300**	**814**	**1,114**	**N/A**	**YES**
Cuyama Joint Unified	300			N/A	

Notes:
N/A = Not Available = Enrollment capacity could not be identified in developer fee justification studies and/or during personal communications with district staff.
Source: Santa Barbara County Education Office 2022c

School districts within the county have several strategies available to increase capacity, including but not limited to utilizing portable facilities, increasing classroom size, increasing staffing levels, transferring teachers across campuses, or adjusting existing programs that affect demand for facilities and resources. Existing funding mechanisms would help to mitigate potential impacts associated with the student population, whether to fund the construction or expansion of existing or new facilities or to implement the strategies outlined above. For example, SB 50 outlines development fees that are

required to be paid by future development before the issuance of building permits. These fees would be used to offset the impact of the additional students generated by the proposed Project through funding modernization, construction, and/or expansion of school facilities. Under Government Code Section 65995.5, payment of developer fees constitutes full mitigation of impacts to schools. Additionally, school districts have the option of entering into various alternative mitigation agreements to ensure the timely construction of school facilities to house students from new residential development. The primary financing mechanism authorized in these mitigation agreements is the formation of a community facilities district, according to the Mello-Roos Community District Act of 1982.

Further, several school districts that are currently approaching or exceeding capacity have already devised plans for expansion of facilities, or implementation of other strategies, to accommodate future development and increases in student populations. For example, the Santa Maria-Bonita School District is currently developing a Facilities Master Plan to assess capacity and facility needs.

Any proposals for construction or expansion of new or existing schools would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible. If such a project is proposed, the Lead Agency under CEQA would be the relevant school district, who, in addition to conducting CEQA review, would also prepare any additional evaluation requirements as required by State codes (e.g., Education Code, California Code of Regulations, Public Resources Code) and California Department of Education policies.

The existing regulatory setting which includes mandatory mitigation impact fees, as well as the overall adequacy of school district capacities and the incremental nature of increases in student population, would ensure that potential impacts to school services and facilities under the proposed Project would remain *insignificant*.

Impact PSR-4. The proposed Project would not result in substantial adverse impacts associated with the need for or provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts.

The proposed Project could increase the population of the county by up to 99,873 people (Table 3.13-12). This additional population would increase the demand for library services in the county. As previously described, library services in the county are grouped into five zones. Although demand for library services would be increased as a result of the proposed Project, exact increases and their distributions are not identifiable. Additionally, due to the growing use of electronic and digital media, library service standards (e.g., a certain number of volumes per thousand residents) are no longer appropriate when assessing the needs of a municipal library. Therefore, new residential units in the county that may be developed under the proposed Project would not immediately equate to a need for increased volume or square feet of library space. Consequently, although library use and demand for resources would be expected to increase under the Project, it is not anticipated that the construction of new library facilities would be required.

The County's funding contribution to library services for each zone is based on the population of the cities and unincorporated areas within the respective zone as certified on January 1 of the prior fiscal year by the California State Library Public Library Fund. The combination of funding sources for public library systems, as well as the increase in the use of electronic and digital media, indicate that any necessary increases in staffing and resources could likely be accommodated within existing

facilities. Further, any proposals for construction or expansion of new or existing schools would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible. If such a project is proposed, the Lead Agency under CEQA would be the County or other local jurisdiction, who would be responsible for conducting CEQA review. Therefore, impacts from the proposed Project would be *insignificant*.

Impact PSR-5. The proposed Project could increase the use of existing parks and recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or could require the construction or expansion of recreational facilities which might have an adverse impact on the environment.

The proposed Project could increase the population of the county by up to 99,873 people in the unincorporated area of the county (Table 3.13-12). This projected additional population would increase demand for recreational facilities and, depending on levels of use for certain facilities, could accelerate the deterioration of public parks and recreation due to intensified overuse.

As described in Section 3.13.3, *Regulatory Setting*, the County employs a standard ratio of 4.7 acres of public parkland for every 1,000 residents per the 1980 Land Use Element and the Santa Barbara County Code of Ordinances: Article IV. Park and Recreation Dedication and Fees. This analysis considers the total public parkland available in the unincorporated county as owned and maintained by County Parks, IVRPD, and CVRD. The unincorporated county's existing parkland-to-population ratio currently meets this standard, with approximately 5.3 acres of parkland for every 1,000 persons (Table 3.13-9). However, the proposed Project would reduce the parkland-to-population ratio of the unincorporated county as a whole to approximately 3.1 acres of parkland for every 1,000 persons, which is substantially below the County's adopted standard (Table 3.13-17).

Table 3.13-17. Public Parkland-to-Population Ratio with Proposed Project by HMA

Total Unincorporated Area Population (2031 with Project)	Total Public Parkland (Acres)	Ratio of Public Parkland (Acres/1,000 people)
239,988	746.9	3.1

Notes:
[1] Population is estimated based on 2020 U.S. Census data for unincorporated areas only. Populations within federally-owned lands and/or outside the County's jurisdiction are not included in the total population. Refer also to Section 3.12, *Population and Housing*.
[2] Total public parkland combines properties owned and operated by County Parks, IVRPD, and CVRD located in unincorporated areas only.
Sources: County Parks 2023; U.S. Census Bureau 2020

As calculated in Table 3.13-18, the proposed Project could create a potential future shortfall of 2.2 acres of parkland per 1,000 people or a need for an additional 381 acres of public parkland countywide.

Table 3.13-18. Potential Changes to Parkland-to-Population Ratios by HMAs

Ratio (acres/1,000 people)	Total Unincorporated County
Current Ratio	5.3 acres/1,000 people
Ratio Under the Proposed Project	3.1 acres/1,000 people
Shortfall/ Surplus (-/+)	-2.2 acres/1,000 people
Additional Public Parkland Required to Meet County Standard	381.0 acres

The shortfall in available public parkland would be felt most severely in the South Coast and the Santa Maria Valley, where 52 percent and 27 percent of the population increase would be distributed, respectively. For example, Orcutt Community Park, which provides 26 acres of public parkland and includes amenities, such as picnic areas, baseball and soccer fields, a playground, and an off-leash dog park, is the primary County-owned community park in Orcutt and would serve new population planned on Clark Avenue. The potential increase in population within Orcutt under the proposed Project would substantially increase the number of people that use this park and potentially degrade areas, such as the ballfields and playground, either physically or through overcrowding. Similarly, neighborhoods in the Eastern Goleta Valley located south of U.S. Highway 101 have only one neighborhood park within reasonable walking distance. Rhoads Park is 1 acre with a playground and lawn area. Increased development in the South Patterson Agricultural Area and the San Marcos Agricultural Area would substantially increase demand for public parkland beyond the acreage and amenities provided by this small neighborhood park. New residents in this area of Eastern Goleta Valley would be required to travel to other public parkland in the area, including Tucker's Grove to the north, Goleta Beach to the south, or parks in the City of Goleta or the City of Santa Barbara. Further, increased school-aged children in this area would change the demand for recreational facilities, including an increased need for sports fields and courts, playgrounds, and active recreation amenities and programs. In the Lompoc Valley, only Vandenberg Village is currently served by two small County-owned parks and Mission Hills has no County-owned parks. Cuyama is served by a single public park, Richardson Park, which totals just shy of 30 acres with County Parks and CVRD properties combined. Given the size of the community in Cuyama and the potential increase in population of over 5,000 people under the proposed Project, including 814 school-aged children, it is anticipated that Richardson Park would experience overcrowding and/or physical degradation.

Even in regions where total public parkland in the unincorporated area is more sufficient, the location of public parks may be not convenient or accessible to proposed new residential and mixed use development, particularly via active transportation modes. For example, the Santa Ynez Valley has sufficient public parkland to serve existing and future populations, but it is contained within three parks, and one of them (Nojoqui Falls) is located remotely from urban communities. Likewise, Waller Park is located along the northern edge of Orcutt, approximately 1 to 2 miles from the potential sites enabled under the Housing Element Update in Orcutt. This distance, which is not walkable, makes Waller Park difficult to access for many families with young children. While the South Coast has many more public parks as compared to the North County, many of the potential rezone locations are located in underserved areas. For example, the nearest public park to Rezone Site No. 11 (Glen Annie) is located in Isla Vista, approximately 4 miles to the south, or Tucker's Grove Park approximately 9 miles to the east. Similarly, the nearest public park to the potential rezone sites within the South Patterson Agricultural Area is Goleta Beach Park, located approximately 1.5 miles to the south.

Additionally, while this park does have picnic areas and a playground, it is primarily focused on coastal access and does not provide sports fields or courts like a community park would.

In addition to impacting the parks and recreation system in the unincorporated area, development on the South Coast in particular could also impact parks and recreation facilities within the incorporated areas of the county, which would also likely experience additional use from planned development in the cities (Section 3.13.4.3, *Cumulative Impacts*). For example, future residents of Rezone Site No. 11 (Glen Annie) or the potential rezone sites within the South Patterson Agricultural area may utilize parks and recreation provided in the City of Goleta, as these potential sites lie adjacent to the city boundary.

With regard to trails, per the Land Use Element, the number of trail miles for riding and hiking paths within the county have not been quantified. Desire by the public for easy and close access to trails and bikeways requires many additional miles of trails and paths than can be justified by using normal projections based on participation rates. Also, the extent of significant landscape within a community such as Santa Barbara which the public wishes to visit will further increase the number of miles of trails and paths needed to satisfy the public demand to reach these sites.

As described above, the Land Use Element includes the PRT Maps, which delineate existing and proposed parks, recreation, and trail facilities throughout the unincorporated area. Based on the PRT Maps, existing and proposed trail corridors are delineated adjacent to or within the following sites from the sites inventory:

- Rezone Site Nos. 1-7 in the South Patterson Agricultural Area
- Rezone Site No. 11 (Glen Annie)
- Rezone Site Nos. 12 (St. Vincent's – East) and 13 (St. Vincent's – West)
- Rezone Site Nos. 19-25 in the Orcutt Community Plan Area
- Rezone Site No. 27 (Boys and Girls Club)
- Rezone Site No. 29 (Hummel Cottages)
- Pending Project No. 40 (Hillside House)

The existence of a PRT Map resource on a site identified in the sites inventory does not determine whether a housing project is obligated to provide a public recreational facility. Any exaction or requirement for the provision of public parks or trails is based on the constitutional principles of nexus and rough proportionality. Similarly, the lack of a map identifying a potential future trail or park does not prevent a recreation facility from being established or required as part of a housing project if there is the appropriate nexus to do so. Implementation of the proposed Project and future development of these sites would not directly conflict with any of the existing or proposed trail corridors identified on the PRT Maps. The PRT Maps are a planning tool that identify existing resources and a conceptual plan for future recreational facilities.

With regard to potential impacts to recreational facilities, the~~The~~ County currently has several policies in place that aim to preserve, expand, and fund recreation~~recreational~~ facilities. For example, the County imposes two types of development impact mitigation fees on new development to help finance the cost of new or expanded parks, trails, and other recreation facilities. First, Ordinance 4317 enacts the Quimby Act locally, which requires that new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances). As described in Section 3.13.3,

Regulatory Setting, the Quimby Act allows fees to be collected for up to 5 acres of parkland per 1,000 residents to serve the needs of residents of the subdivision and the greater public residing in the city or county. Second, County Ordinance 4348 also imposes development impact mitigation fees for new residential, commercial, and industrial development. Program 22 of the adopted Housing Element requires that the County periodically update these feeds to reflect population growth and increased demand for recreation facilities. In addition, the ~~These fees are to be consistent with current Quimby Act fees. The~~ Mello-Roos Community Facilities Act of 1982 and the Landscaping and Lighting Act of 1972 also help to ensure funding for the construction or maintenance of new or existing parks.

Quimby Act and park~~Park~~ and recreation development impact mitigation fees would be collected by the County to help construct~~support the provision of~~ new and expanded parks, trails, and other recreation facilities. However, collected fees would be insufficient to fully offset the shortfall of public parkland to residents (-2.2 acres/1,000 residents; Table 3.13-18) that could occur based on the projected population growth enabled under the implementation of the proposed Project (i.e., 99,873 residents) (Table 3.13-12). Park and recreational fees would be insufficient to address the public parkland ratio to residents ratio enabled by the proposed Project due to the scarcity of suitable land for public parkland and high land costs in the county, particularly in the Urban Area, as well as high construction costs to construct recreational facilities, including parks and trails. As such, the collection of in-lieu fees alone would not address the increased demand for parkland and recreation facilities resulting from the proposed Project and would not sufficiently ensure the recreation needs are met within communities with limited public parkland.

In addition to fees, the County has adopted development standards for various zoning districts that require the provision of common open space and common recreational facilities onsite. Under these existing development standards, for the Design Residential (DR) zone district, a minimum of 40 percent of the net site area shall be reserved for the life of the project as common open space (LUDC Section 35.23.060[B]). These open space requirements are reduced to a minimum of 30 percent of the net site area for projects in DR zones that qualify as affordable housing development projects (LUDC Section 35.23.060[D][2][b]). The proposed Project includes the potential rezoning of sites to the DR zone district to allow for the development of higher density residential development under Program 1, Adequate Sites for RHNA and Monitoring of No Net Loss (Program 1). As a result, the development of DR-zoned sites would be required to reserve some acreage of each site as common open space. Common open space includes recreational areas and facilities for the use of residents or guests of a development. Common open space may be used for recreational facilities (e.g., tennis courts, playgrounds, swimming pools, trails or walking paths) or other open spaces needed for the protection of habitat, archaeological, scenic, or other resources. As a result, common open spaces would not meet the definition of public parkland and may provide little recreational value for residents of a housing project. Further, Program 1, directs the County to revise development standards to ensure that maximum densities can be achieved for rezone sites and may include reductions in open space requirements. This may reduce the ability for these development standards to result in adequate onsite recreation amenities to serve future residents. Due to these limitations and potential amendments to development standards for rezoned sites under the Housing Element Update, impacts are considered *potentially significant.*

Implementation of **MM LU-1 (Amendments to Design Residential [DR] Zoning)** would partially mitigate impacts through an amendment to the County's zoning ordinances for the DR Zone District to allow public parkland as part of required open space. This dedicated public parkland could include~~range from~~ sports fields and courts, trails and walking paths, ~~to~~ play structures, and picnic areas and would expand the inventory of public parkland within unincorporated areas. While this

mitigation measure would not require the dedication of public parkland as part of housing projects, it would create the opportunity for housing projects to dedicate public parkland to serve both project and community demands for recreation facilities, consistent with the Comprehensive Plan, County PRT maps, and the zoning ordinances. As a result, the mitigation measure would potentially increase the amount of public parkland available and help to ensure that the new public parkland is located appropriately within communities that are directly impacted by the new housing development and increased populations.

Dedication and development of public parkland as part of housing development projects would have impacts addressed in this Program EIR from site development based on the sites inventory prepared for the Housing Element Update. Any future proposals for the expansion of existing recreational facilities or the construction of new recreational facilities using mitigation fee funds would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible. If such a project is proposed, the Lead Agency under CEQA would be the County, which would be responsible for conducting the CEQA review.

However, despite the implementation of **MM LU-1**, impacts on recreation facilities would remain significant. As described above, existing standards and fees used to secure recreational improvements to serve communities would not be sufficient to ensure adequate public parklands and recreation facilities such as public trails are provided to serve the existing county resident population and residents of the Project. This is primarily due to the amount of public parkland that would be needed to adequately serve the increased population associated with the proposed Project, as well as limitations in the ability to acquire suitable lands within the Urban and Rural Areas that would be accessible by existing and future county residents, the scarcity of such suitable land for public parkland and high land costs in the county, particularly in the Urban Area, as well as high construction costs to construct recreational facilities. Therefore, impacts would remain *significant and unavoidable.*

3.13.4.3 Cumulative Impacts

As described in Section 3.0, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of long-range plans, policies, and initiatives, as well as development projects (housing and non-housing related) in the unincorporated county and surrounding incorporated cities. Project impacts along with potential impacts from pending and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects, such as the Accessory Dwelling Unit (ADU) Ordinance Amendments (Cumulative Project No. 13) to incorporated cities in Santa Barbara County's 2023-2031 Housing Element Update (Cumulative Project No. 1 – 8) (Table 3-6). The proposed Project would result in cumulatively considerable impacts if, in combination with other cumulative pending plans and projects, it would result in substantial adverse impacts associated with the need for expansion or the construction of new fire protection, law enforcement and police protection, school, library, or parks and recreation facilities, the construction of which could cause significant environmental impacts.

Included in the cumulative setting for the proposed Project are the housing element updates for each of the eight incorporated cities within the county (Table 3-6). Under each of these cumulative projects, each agency is planning for how to meet local housing needs and the RHNA assigned by the Santa Barbara County Association of Governments (SBCAG) by identifying potential sites for new housing development and implementing a variety of programs that would encourage or facilitate new residential development. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units. Other cumulative planning

efforts include the Countywide Recreation Master Plan, which could facilitate or propose new parks, recreation, and trails in rural and urban unincorporated areas, and the Agricultural Enterprise Ordinance, which could facilitate limited rural agritourism and increased commercial agricultural operations.

As with the County's Housing Element Update, the housing element updates for the eight incorporated cities are expected to increase population and demand for public services and parks and recreation facilities. Many of the incorporated cities have municipal fire departments; however, the housing element updates for the eight incorporated cities could compound the demand on SBCFD resources as a result of mutual aid agreements with Carpinteria/Summerland Fire Protection District (FPD), Guadalupe City Fire Department (FD), Lompoc City FD, Montecito FPD, Santa Barbara City FD, Santa Maria City FD. Regionwide increases in demand for these services as a result of implementation of these cumulative projects, as well as the proposed Project which would represent a substantial contribution, would result in continued deficiencies in these fire protection services, resulting in a potential cumulative impact. Due to a lack of feasible mitigation for reducing the Project's contribution to impacts on fire protection services, the Project's impacts are considered cumulatively considerable and would be *significant and unavoidable.*

Concerning law enforcement and police protection, Sheriff deputies only have jurisdiction in the county where they are employed. Local, or city, police officers only have jurisdiction in the city where they are employed, but may enact mutual aid agreements to support or request support for law enforcement in other jurisdictions. Therefore, the proposed Project would not contribute to a cumulatively significant impact on law enforcement and police protection facilities. Similarly, medical and healthcare facilities are regionally serving, including cities and unincorporated communities. Increased demands on private emergency medical and healthcare facilities are monitored by SBCEMSA and SBCPHD and changes to staffing and equipment would be made through the annual budget planning process for public and private healthcare agencies. As a result, the proposed Project would not contribute to a cumulatively significant impact on emergency medical and healthcare facilities.

Future development within the county and the incorporated cities would be expected to increase school enrollment. In particular, given that the population increase associated with the Housing Element Update would exceed the existing capacities of the districts throughout the Santa Maria Valley, any future development in the City of Santa Maria as a part of its housing element update would compound this impact. While the implementation of the County's Housing Element Update would result in student enrollment that approaches but does not exceed the existing capacities of the districts within the South Coast, additional development in the incorporated cities of the South Coast could result in the exceedance of these capacities. Nevertheless, with the collection of developer fees under SB 50 and required CEQA compliance, the implementation of the proposed Project would not substantially contribute to a cumulatively significant impact.

The implementation of the proposed Project would have an insignificant impact on libraries. Combined with future growth in cities, demand for libraries could increase, but the combination of funding sources for public library systems, as well as the increase in the use of electronic and digital media, indicate that any necessary increases in staffing and resources could likely be accommodated within existing facilities, and as a result, the proposed Project would not contribute to a cumulatively significant impact.

The proposed Project would substantially reduce the public parkland ratio within the unincorporated area of the county. This could result in physical deterioration and/or overcrowding of existing public parks in both the unincorporated communities and cities adjacent to potential future housing projects in the unincorporated area. Additionally, residential development within the unincorporated areas of the county could increase the use of city parks within the incorporated cities. With the collection of in-lieu fees under the Quimby Act as well as the implementation of **MM LU-1 (Amendments to Design Residential [DR] Zoning)**, impacts on parks and recreation associated with the proposed Project would be partially mitigated. Additionally, the proposed adoption and implementation of the Countywide Recreation Master Plan and Agricultural Enterprise Ordinance could provide additional park and recreational facilities throughout the county, alleviating some of the demand on existing facilities. However, due to the projected increase in demand generated under cumulative conditions, the proposed Project's contribution would remain cumulatively considerable, and impacts would be cumulatively *significant and unavoidable*.

3.13.4.4 Proposed Mitigation

Implementation of **MM LU-1** is required to reduce impacts associated with increased demand for and use of recreational facilities.

3.13.4.5 Secondary Impacts

Implementation of **MM LU-1** would not result in result in any secondary impacts.

3.13.4.6 Residual Impacts

Impact PSR-1. The proposed Project would involve residential and mixed use development in areas of the county that could result in a substantial increase in demand for fire protection services, particularly in areas where existing services and/or response times are inadequate. No feasible mitigation exists that could adequately mitigate the associated impacts of the proposed Project, and impacts would be *significant and unavoidable.*

Impact PSR-2, PSR-3, and PSR-4. The maximum potential population increase associated with the proposed Project would have *insignificant* impacts on law enforcement and police protection and emergency medical and healthcare services, school facilities, and libraries. Where improvements or expansion of services is required, any proposals for construction or expansion of new or existing facilities would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible.

Impact PSR-5. While parkland mitigation fees would be collected by the County, the primary barrier to the construction of new County parks is the availability of land. As such, the collection of in-lieu fees alone would not address the substantially increased demand for parkland resulting from the proposed Project. The implementation of **MM LU-1 (Amendments to Design Residential [DR] Zoning)** would help address this issue by allowing public parkland on sites zoned DR to increase the amount of public parkland available and help ensure that the new public parkland is located appropriately within communities that are directly impacted by the new housing development and increased populations. However, existing standards and fees used to secure recreational improvements to serve communities would not be sufficient to ensure adequate public parklands are provided to serve the existing county resident population and residents of the Project. This is primarily due to the amount of public parkland that would be needed to adequately serve the

increased population associated with the proposed Project, as well as limitations in the ability to acquire suitable lands within urban areas or rural communities that would be accessible by existing and future county residents. Therefore, impacts would remain *significant and unavoidable.*

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Section 3.14
Transportation

3.14.1 Introduction

This section describes potential impacts to transportation that could occur from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). The section describes the existing multi-modal transportation system in the unincorporated areas of Santa Barbara County and reviews applicable plans, policies, programs, and standards adopted by applicable agencies, including the County, the Santa Barbara County Association of Governments (SBCAG), and the California Department of Transportation (Caltrans). This analysis addresses temporary construction-related impacts and long-term operational impacts that could result from potential future residential and mixed use development enabled under the proposed Project.

Many factors affect travel behavior, including density and diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit and active transportation facilities, development scale, demographics, and transportation demand management (TDM). Typically, low-density development at greater distances from other land uses, located in areas with poor access to public transit, generate more vehicle trips as compared to development located in urban areas, where there is higher population density and a mix of land uses (e.g., commercial uses near housing), and public transit options are available. Consistent with the requirements of Senate Bill (SB) 743, the California Environmental Quality Act (CEQA) Guidelines, and the County's *Environmental Thresholds and Guidelines Manual*, the discussion focuses on Vehicle Miles Traveled (VMT), which measures the number of vehicle trips and their distances, rather than Level of Service (LOS), which measures roadway capacity, intersection operations, and traffic congestion. VMT is discussed in terms of total VMT and VMT per capita. Total VMT is a measure of the number of vehicle trips and distances that residents, employees, or visitors drive, determined by multiplying the total number of trips generated by the average length of the trips measured in miles. VMT per capita is calculated as the total annual miles of vehicle travel divided by the total population in the planning area. VMT per capita is an efficiency metric that facilitates comparison with state policy goals to reduce vehicle energy use, particularly that associated with non-renewable fossil fuels, associated greenhouse gas (GHG) emissions, and adverse effects on global climate change. In addition to VMT, this analysis addresses consistency with applicable regional and transportation plans, roadway configurations and safety issues, and emergency access issues.

3.14.2 Environmental Setting

3.14.2.1 Countywide Transportation Network

Santa Barbara County is served by a multi-modal transportation system that supports a wide range of transportation infrastructure, including infrastructure owned and managed by the state (Caltrans), local agencies such as the County and eight incorporated cities, and private entities. The countywide transportation network consists of approximately 2,054 miles of maintained public roadways,

15 public transit service systems, dozens of private transportation services, and 350 miles of Class I, II, and III bikeways (SBCAG 2017). The County Public Works Department, Transportation Division, maintains approximately 1,650 lane miles of roads in unincorporated areas (i.e., areas not within one of the eight incorporated cities) of Santa Barbara County. This roadway network is critical to the movement of people, goods, and services throughout the region. County roads, and their associated bicycle and pedestrian facilities, provide access for public transit, people who walk and bike, and vehicles (County of Santa Barbara 2023).

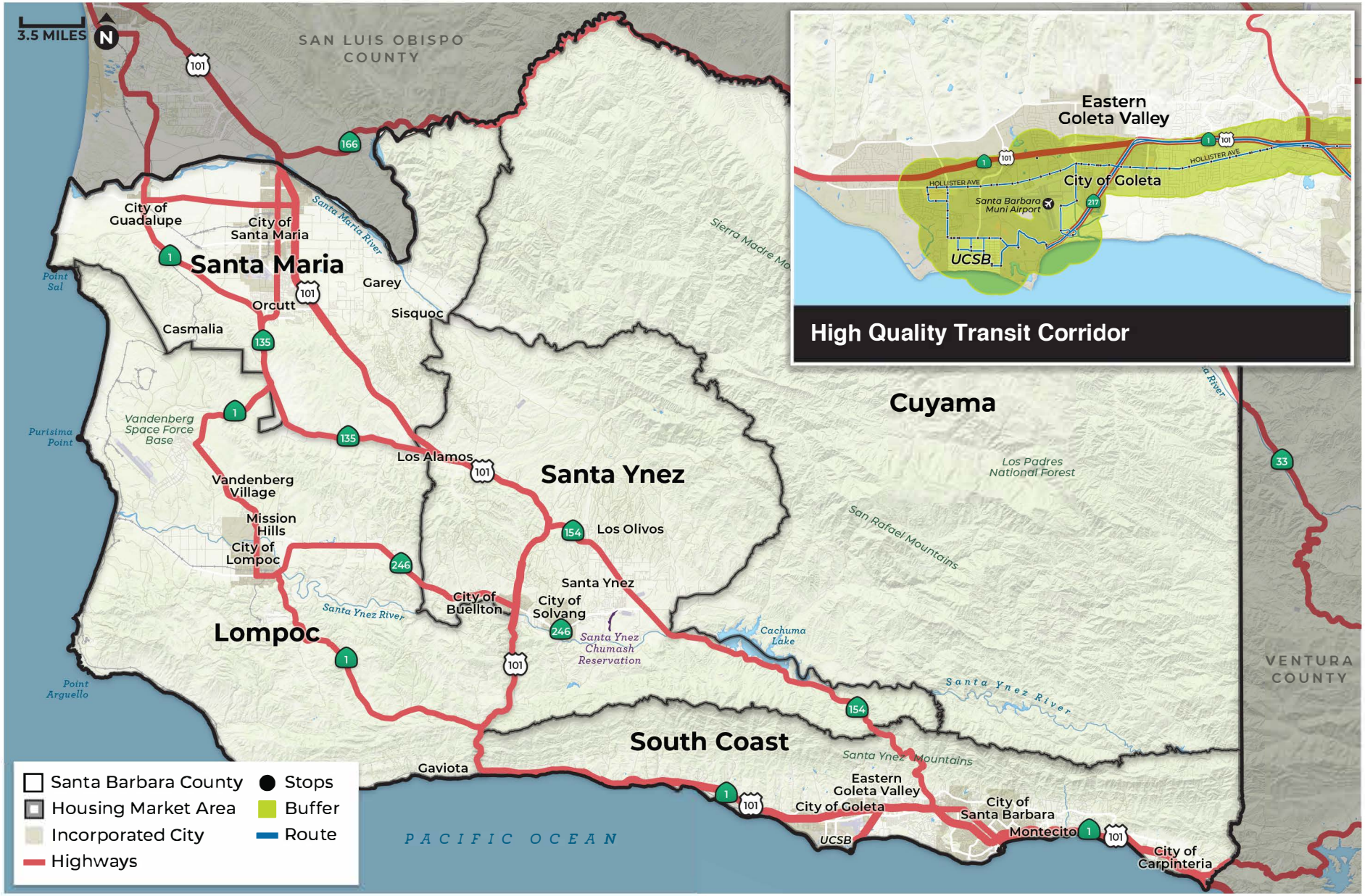
U.S. Highway 101 and State Routes

U.S. Highway 101 is a major transportation corridor that extends through California and is an important travel corridor for Santa Barbara County. State Routes (SRs) – including all or parts of SR 1, SR 33, SR 135, SR 144, SR 150, SR 154, SR 166, SR 192, SR 217, SR 225, and SR 246 – facilitate regional access throughout the county. U.S. Highway 101 and the SRs are depicted in Figure 3.14-1 and described in further detail below. Additionally, Table 3.14-1 provides a brief description and Annual Average Daily Trip (AADT) volume for select highways and state routes in the county for which Caltrans or other local agencies provide traffic counts.



U.S. Highway 101 traverses the county in a north-south direction and carries the highest volumes of any roadway in the unincorporated county with a maximum of 139,000 AADT in Eastern Goleta Valley. Source: Santa Barbara Newspress

U.S. Highway 101 serves as the primary transportation link between the urban areas located throughout Santa Barbara County and connects the county with Ventura County to the south, and San Luis Obispo County to the north. U.S. Highway 101 runs for approximately 90 miles within Santa Barbara County as a limited-access freeway, especially within urban areas (SBCAG 2021a). However, there are segments along the Gaviota Coast, outside of Buellton and Los Alamos, with side street and driveway access in these rural areas (SBCAG 2021a). U.S. Highway 101 forms the foundation of the local transportation network, provides the primary freight artery through much of the Central Coast, and is critical for the movement of people and goods statewide. Most trips along this route are related to business, government, recreation, tourism, and daily living, including work commutes, resulting in congestion along U.S. Highway 101 in Santa Maria and between the South Coast and Ventura County. U.S. Highway 101 carries the highest volume of traffic of any roadway within the unincorporated county, ranging from approximately 20,300 AADT at its junction with SR 246 near Buellton to 135,000 AADT at its junction with SR 154 in Eastern Goleta Valley (Caltrans 2022). A portion of U.S. Highway 101 along the Gaviota Coast is a designated scenic highway as part of Caltrans' State Scenic Highway System, and the entire length of U.S. Highway 101 in Santa Barbara County is eligible for official designation as a scenic highway. (Refer to Section 3.1, *Aesthetics and Visual Resources* for more information about scenic highways and visual resources.)



Santa Barbara County Transportation Network

FIGURE 3.14-1

Table 3.14-1. Traffic Counts for the Selected State Highway Segments Serving Unincorporated Urban Communities

Segment	Location	Region	Classification[1]	Policy/Design Capacity	AADT Volume[2]
U.S. Highway 101	Carpinteria, Casitas Pass Road	South Coast	Urban 4-lane Freeway	67,000	68,300
U.S. Highway 101	Union Valley Parkway	Santa Maria Valley	Rural 4-lane Freeway	44,000	37,000
U.S. Highway 101	Santa Maria, Clark Avenue	Santa Maria Valley	Rural 4-lane Freeway	44,000	28,000
U.S. Highway 101	Turnpike Road	South Coast	Rural 6-lane Freeway	67,000	107,000
U.S. Highway 101	El Sueno Road	South Coast	Urban 6-lane Freeway	100,000	109,000
U.S. Highway 101	SR 154 Junction	South Coast	Urban 6-lane Freeway	100,000	109,000
U.S. Highway 101	Storke Road	South Coast	Urban 4-lane Freeway	67,000	35,500
U.S. Highway 101	SR 217 Junction	South Coast	Urban 6-lane Freeway	100,000	80,000
U.S. Highway 101	Santa Monica Road	South Coast	Urban 6-lane Freeway	100,000	64,000
SR 1	Pine Canyon Road	Lompoc Valley	Rural 4-lane Expressway	44,000	14,400
SR 135	East Clarke Avenue	Santa Maria Valley	4-lane Primary 1	47,760	16,800
SR 154	SR 246 Junction	Santa Ynez Valley	2-lane Expressway	11,000	10,000
SR 166	Bonita School Road	Santa Maria Valley	2-lane Major Road	10,000	15,800
SR 192	SR 154 Junction	South Coast	Arterial	30,000	12,700
SR 192	San Ysidro Road	South Coast	2-lane Major Road	10,000	7,500
SR 192	Carpinteria, Linden Avenue	South Coast	Collector Road	5,000	3,200
SR 217	Hollister	South Coast	Urban 4-lane Freeway	67,000	14,500
SR 246	Lompoc, SR 1 Junction	Lompoc Valley	Urban Expressway	50,000	10,800
SR 246	Domingus Road	Santa Ynez Valley	2-lane Expressway	11,000	4,000

Notes:

[1] Roadway classifications are further defined in Table 3.14-2.

[2] AADT represents peak ahead or back AADT, whichever is greater. Back AADT represents traffic south or west of the count location. Ahead AADT represents traffic north or east of the count location.

Sources: Caltrans 2022; City of Carpinteria 2003; County of Santa Barbara 2004, 2016.

SR 1 is a major north-south state highway that runs along most of the Pacific coastline in California. In Santa Barbara County, the route extends approximately 80 miles from its intersection with U.S. Highway 101 just north of Gaviota, through the City of Lompoc and the unincorporated community of Vandenberg Village, over Harris Grade into the San Antonio Creek Valley, joining with SR 135 north to the Santa Maria Valley where it traverses southwest Orcutt, eventually continuing into San Luis Obispo County. SR 1 average trip volumes range from approximately 3,700 AADT at its intersection with Clark Avenue in Orcutt to 28,500 AADT at its intersection with Casmalia Road in Lompoc (Caltrans 2022). Commuter traffic has become the major component of congestion along SR 1 south of the City of Lompoc due to a regional jobs-housing imbalance with more than 15,000 Lompoc residents commuting to employment on the South Coast daily. In addition to linking the Lompoc Valley with the Santa Maria Valley and the South Coast, SR 1 serves as the main street through the historic centers of the cities of Lompoc and Guadalupe and is a designated scenic highway as part of Caltrans' State Scenic Highway System. (Refer to Section 3.1, *Aesthetics and Visual Resources* for more information about scenic highways and visual resources.) In addition to linking major coastal communities at the regional level, SR 1 is vitally important for local travel. In Santa Barbara County, SR 1 carries an average of between 2,900 to 27,100 AADT (Caltrans 2022).

SR 154 is an east-west route that serves regional and interregional travel, spanning a distance of approximately 33 miles through the Los Padres National Forest (LPNF) and the Santa Ynez Valley. Between its interchanges with U.S. Highway 101 on the South Coast and north of Buellton, SR 154 average trip volumes range from approximately 10,000 AADT at its junction with SR 246 in Santa Ynez Valley to 26,000 AADT at its junction with U.S. Highway 101 in Eastern Goleta Valley (Caltrans 2022). At its northern junction with U.S. Highway 101, SR 154 runs through the Santa Ynez Valley, past the community of Los Olivos, and through rural agricultural land to its junction with SR 246, which links this route to the community of Santa Ynez and City of Solvang, as well as U.S. Highway 101 to the west. The route then continues to the ranchlands and lower foothills of the Santa Ynez Mountains to San Marcos Pass, then travels down the coastal side of the mountains to U.S. Highway 101. SR 154 has become a major commuter route for residents of North County with employment on the South Coast and is a designated scenic highway as part of Caltrans' State Scenic Highway System. (Refer to Section 3.1, *Aesthetics and Visual Resources* for more information about scenic highways and visual resources.) The corridor provides an alternative access route through southern Santa Barbara County when segments of U.S. Highway 101 are closed due to harsh weather, incidents, or other emergencies.



SR 154 connects Eastern Goleta Valley with the inland portion of the county, including Santa Ynez and is the only regional transportation route to Lake Cachuma.
Source: Google Earth

SR 246 is the primary east-west route between the City of Lompoc and the Santa Ynez Valley. This route also connects U.S. Highway 101 with SR 154. SR 246 serves as a key roadway for the county's agricultural areas, including wineries. This connection is also critical to connecting North County and the South Coast. SR 246 average trip volumes range from approximately 3,950 AADT at its

intersection with Clark Avenue in Orcutt to 28,500 AADT at its intersection with Casmalia Road in Lompoc (Caltrans 2022).

SR 217 connects U.S. Highway 101, the Santa Barbara Airport, and the University of California, Santa Barbara (UCSB). Its interchange with Hollister Avenue and partial interchange with South Patterson Avenue provide important access to the Eastern Goleta Valley. SR 217 average trip volumes range from approximately 10,500 AADT at its terminus at UCSB to 21,000 AADT at its junction with U.S. Highway 101 in Eastern Goleta Valley (Caltrans 2022).

SR 192 is an east-west route running through the South Coast that provides an alternative east-west travel route to U.S. Highway 101, particularly during the peak hour when U.S. Highway 101 experiences congested conditions. SR 192 average trip volumes range from approximately 1,500 AADT in Toro Canyon to 12,000 AADT at its junction with SR 154 in Eastern Goleta Valley (Caltrans 2022).

SR 135 runs through the unincorporated communities of Los Alamos and provides important access to jobs at Vandenberg Space Force Base (VSFB) for residents of Orcutt and Santa Maria and serves as a western bypass of U.S. Highway 101 in northern Santa Barbara County. Its interchange with Clarke Avenue and at-grade intersection with Union Valley Parkway provide important access to the community of Orcutt. SR 135 average trip volumes range from approximately 1,900 AADT near Los Alamos to 31,000 AADT at its intersection with Betteravia Road in Santa Maria (Caltrans 2022).

SR 166 travels east-west and is the only route within the county that connects to Cuyama Valley. Thus, it is a crucial transportation route for transporting goods and people, as well as an emergency access route, for the communities of Cuyama and New Cuyama. SR 166 average trip volumes range from approximately 2,700 AADT at its intersection with Perkins Road in New Cuyama to 29,000 AADT at its junction with SR 135 in Santa Maria (Caltrans 2022).

Local Roadways

The County maintains 1,650 lane miles of roads in the unincorporated areas of the county (County of Santa Barbara 2023). As adopted in the County's Circulation Element, the County's roadway classification system consists of seven basic functional classes of roads, each with an assigned carrying capacity or traffic volume, as summarized in Table 3.14-2 below and Section 3.14.3.3, *Local.*

Regional access and important local roads are described for each of the five Housing Market Areas (HMAs) below.

Santa Maria Valley

Access to the Santa Maria Valley is provided by U.S. Highway 101, SR 1, SR 135, and SR 166. Primary access to Orcutt off of U.S. Highway 101 and SR 135 is provided via Clarke Avenue and Union Valley Parkway. Within Orcutt, major east-west access is provided by Clarke Avenue which extends for almost 4 miles from U.S. Highway 101 to SR 1 on the west in the south-central part of the community, while Union Valley Parkway currently serves northern neighborhoods and extends for 2.5 miles from U.S. Highway 101 west to South Blosser Avenue. Clarke Avenue is a four-lane road with signalized intersections over most of its reach but narrows two lanes in Old Town Orcutt and as it passes by major undeveloped land in southwest Orcutt. Union Valley Parkway is four lanes between U.S. Highway 101 and SR 135, narrowing to two lanes east of Foxenwood Drive. Union Valley Parkway is planned to be extended southwest to SR 1 when undeveloped lands in southwest Orcutt are

developed. Primary north-south access within Orcutt is provided by Bradley Road, which extends for over 3 miles from Rice Ranch Road in the south to Santa Maria Way in the north and is four lanes over most of its reach. Table 3.14-3 provides known AADT and design capacities of local Orcutt roadways that serve as principal access routes between residences and employment and commercial centers.

Table 3.14-2. County Circulation Element Roadways Classifications

Roadway Classification	Circulation Element (2014)	Policy Capacity (ADT)[1]
Freeway	4- to 6-lane divided arterial highway with full control access and grade separations at intersections. Serve as principal arterials of the inter- and intra-state system.	Urban 4-lane: 67,000 Rural 4-lane: 44,000 Urban 6-lane: 100,000 Rural 6-lane: 67,000
Expressway	4-lane arterial highway with partial control of access which may or may not be divided or have grade separations at intersections. Carry much of the traffic between important centers of activity and employment.	Urban: 50,000 Rural: 33,000
2-Lane Expressway	2-lane arterial highway with at least partial control of access which may have grade separations at intersections. Carry much of the traffic between important centers of activity and employment.	Urban: 16,000 Rural: 11,000
Arterial Road	Divided 4-lane road with intersections at grade and partial control of access. Serve as principal access routes to shopping areas, places of employment, community centers, recreational areas, and other places of assembly.	Urban/Rural: 30,000
Major Road	Undivided 4-lane road with intersections at grade and partial control of access. Frequently serve as access to shopping areas, places of employment, recreational areas, residential areas, and other places of assembly.	Urban/Rural: 20,000
2-lane Major Road	Undivided 2-lane road with intersections at grade and partial control of access. Frequently serve as access to shopping areas, places of employment, recreational areas, residential areas, and other places of assembly.	Urban/Rural: 10,000
Collector Road	Undivided 2-lane road with intersection at grade and designed to take a minimum interference of traffic from driveways. Designed to provide principal access to residential areas or to connect streets of higher classification.	Urban/Rural: 5,000

Notes:
[1]Policy capacity is not representative of the physical capacity of a given road segment. Community plans and transportation improvement plans (TIPs) in the Goleta and Orcutt Planning Areas further address the roadway classification system and project consistency standards based on physical roadway design capacities.
Source: County of Santa Barbara 2014.

Table 3.14-3. Orcutt Roadways AADT and Design Capacity

Roadway	Location	Region	Classification	Policy/Design Capacity (ADT)	AADT
SR 135	West Clark Avenue	Santa Maria Valley	4-lane Freeway (P-1)	47,800	16,800
U.S. Highway 101	Santa Maria, Clark Avenue	Santa Maria Valley	4-lane Freeway (P-1)	47,800	28,000
Clark Avenue	Bradley Road to Stilwell Road	Santa Maria Valley	Arterial Road (P-2)	30,000	16,100

Source: County of Santa Barbara 1997, 2020; Caltrans 2022.

Within this region, the unincorporated communities of Casmalia, Sisquoc, and Garey are located approximately 5 to 7 miles from regional highways, with access provided by narrow rural roads. Access to Casmalia is provided by Black Road and access to Garey and Sisquoc is provided by Foxen Canyon Road. Access to individual properties is provided by a network of often short dead-end rural roads.

Lompoc Valley

Regional access to the Lompoc Valley is provided via SR 1, which provides north-south connections between VSFB, Vandenberg Village, Mission Hills, Mesa Oaks, and the City of Lompoc. SR 246 also provides primary regional access to the Lompoc Valley and east-west connections between the cities of Lompoc, Buellton, Solvang, and Santa Ynez Valley.

Narrow, rural roads, usually consisting of two lanes also connect these Lompoc Valley region communities. Burton Mesa Boulevard, a winding two-lane road extends approximately 3 miles east to connect Vandenberg Village with the community of Mission Hills. Similarly, Purisima Road, a two-lane roadway, extends approximately 2 miles along the southern end of Mission Hills between SR 1 and SR 246 to connect the communities of Mission Hills and Mesa Oaks.

Santa Ynez Valley

The Santa Ynez Valley is accessible by U.S. Highway 101, SR 154, and SR 246. Access from these regional highways is provided by narrow two-lane roads including the Avenue of Flags, Santa Rosa Road, Ballard Canyon Road, Chalk Hill Road, Roblar Avenue, Alamo Pintado, Refugio Road, Edison Street, and Baseline Avenue. The Los Olivos, Ballard, and Santa Ynez are served by a local street network that provides access to individual properties.

Cuyama Valley

Access to the unincorporated communities of Cuyama, New Cuyama, and Ventucopa is relatively limited. SR 33 provides regional access from the south before becoming SR 166. Access to these unincorporated communities is provided by narrow rural roads with access to individual properties provided by a network of often short dead-end roads.

South Coast

Regional access to the South Coast is primarily provided by U.S. Highway 101, which runs east to west through the region connecting the region with the Gaviota, the City of Carpinteria, and Ventura County. Both SR 217 and Storke Road diverge south from U.S. Highway 101 to provide access to Isla Vista. SR 192 runs through Montecito and north of Summerland before curving north into SR 154, which provides access to the Santa Ynez Valley.

Within the South Coast, the local roadway system of Eastern Goleta Valley consists of a network of neighborhood streets connecting to primary and arterial roadways which are primarily used to connect residences to destinations such as shopping centers, schools, places of employment, and neighboring cities. This area is served by three main east-west travel corridors: U.S. Highway 101, Cathedral Oaks Road, and Hollister Avenue. These east-west travel corridors are connected by five~~three~~ main north-south corridors: Patterson Avenue, Turnpike Road, ~~and~~ SR 154, Glen Annie Road, and Storke Road. These three corridors provide the opportunity to cross U.S. Highway 101 from north to south. Table 3.14-4 provides known AADT and design capacities of key roadways in Eastern Goleta Valley.

Table 3.14-4. Eastern Goleta Valley Roadway AADT and Design Capacity

Roadway	Location	Classification	Policy/Design Capacity	AADT Volume~~1~~
Cathedral Oaks	SR 154	Urban 2-lane Expressway	16,000	9,800
Patterson Avenue	Hollister Avenue to U.S. Highway 101	Major Road	20,000	24,800
Hollister Avenue	Walnut Avenue to San Marcos Road	Arterial Road	30,000	14,600
San Marcos Road	Hollister Avenue to San Simeon Drive	Collector Road	5,000	1,700
Turnpike Road	Hollister Avenue to U.S. Highway 101	Arterial Road	30,000	22,800
Hollister Avenue	Turnpike to Upper State Street	Arterial Road	30,000	14,800
Calle Real	West of SR 154	Arterial Road	30,000	9,700
Glen Annie Road[1]	North of U.S. Highway 101	Principal Arterial	34,000	8,000
Storke Road[1]	South of U.S. Highway 101	Principal Arterial	34,000	35,000
Hollister Avenue[1]	East of Storke Road	Principal Arterial	34,000	25,000

Notes:
[1] Glen Annie Road, Storke Road, and Hollister Avenue are located within the incorporated area of the City of Goleta and subject to the City of Goleta's roadway classifications and design capacity.
Source: County of Santa Barbara 2015; Personal Communication with City of Goleta 2024; City of Goleta 2019.

Public Transit and Railway Transportation

As described in the County's Regional Transportation Plan (RTP), Connected 2050: Santa Barbara County Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), there are 15 public transit services provided within Santa Barbara County. These services are summarized in further detail below. The South Coast is the only region that currently has a High-Quality Transit Corridor (HQTC), defined as a corridor with fixed-route bus service with service intervals no longer than 15 minutes during peak commute hours. This HQTC is located along the extent of Hollister Avenue in the Eastern Goleta Valley between the City of Santa Barbara and the City of Goleta and is achieved primarily by the operations of Line 11 operated by the Metropolitan Transit District (MTD). Public transportation serving the unincorporated communities of the Santa Maria Valley, Santa Ynez Valley, Lompoc Valley, and Cuyama Valley generally operate with 35- to 45-minute wait times, described in greater detail below.

Amtrak

Three Amtrak train stations are located in Santa Barbara County. The Santa Barbara Amtrak Station is located in the City of Santa Barbara's downtown area. MTD connections are provided at the Santa Barbara Amtrak Station. The City of Carpinteria Amtrak Station is located on Linden Avenue near the City's downtown area and Carpinteria State Beach. The Goleta Amtrak Station is located in the City of Goleta in a light industrial area off La Patera Lane north of Hollister Avenue. The two Amtrak lines serving these stations include the Pacific Surfliner and the Coast Starlight. Santa Barbara County destinations served by the Pacific Surfliner include Lompoc-Surf, Guadalupe, Goleta, Santa Barbara, and Carpinteria. The Pacific Surfliner runs four times daily in each direction. Coast Starlight destinations in Santa Barbara County include the cities of Santa Barbara and Oxnard. Coast Starlight runs once daily in each direction. The Connecting Amtrak Thruway bus service is offered from the train stations to the UCSB campus, Solvang-Santa Ynez Valley, and Santa Maria.



The Santa Barbara Amtrak station is located in the downtown of the City of Santa Barbara and provides regional passenger train services via Amtrak's Pacific Surfliner and Coast Starlight lines.
Source: Google Earth

Greyhound

Amtrak and Greyhound bus services work in partnership so that Amtrak passengers can purchase a Greyhound connection to cities not served by rail or Amtrak Thruway services alongside their Amtrak purchase. Greyhound destinations in Santa Barbara County include the Santa Barbara Amtrak Station and UCSB campus.

Santa Maria Regional Transit (SMRT)

The City of Santa Maria operates a fixed-route public transit service known as the Santa Maria Regional Transit (SMRT) inter-regional bus service serving the cities of Santa Maria, Lompoc, and

Buellton/Solvang and the unincorporated community of Orcutt. SMRT provides service Monday through Friday between the hours of 6:00 A.M. and 8:30 P.M., and Saturday and Sunday between the hours of 8:30 A.M. and 6:30 P.M. Routes 6, 12X, and 5 connect the City of Santa Maria with the unincorporated community of Orcutt. Routes 6 and 12X make stops along Clark Avenue. Route 6 frequents five stops (Crossroads Shopping Center, S. Bradley, and E. Foster, Oak Knolls Shopping Center, Clark and Pacific, and Foster Road at Youth Center) with each bus arriving approximately 45 minutes apart between 6:45 A.M and 7:30 P.M. Route 12X frequents seven stops (Transit Center, Broadway and Stowell, McCoy and Broadway, Santa Maria Airport [upon request], Orcutt and Foster, Clark and Orcutt, Foster and Bradley), with each bus arriving roughly one hour apart between 6:30 A.M. and 4:45 P.M. Route 5 frequents four stops (Transit Center, Miller and Daniel, Lakeview and Orcutt, Miller and Betteravia), with each bust arriving approximately 45 minutes apart between the hours of 6:30 A.M. and 7:15 P.M.

SMRT also provides weekday commuter service via two routes. Headways or the frequency of service is relatively low with service to many stops at 45-minute intervals or longer during peak commuting with longer intervals during non-peak periods. SMRT Route 30 (formerly Breeze 100) operates weekdays from 5:40 A.M. to 6:00 P.M. and serves the City of Santa Maria, VSFB, a single stop in Vandenberg Village (Burton Mesa Boulevard and Constellation Road), and the City of Lompoc. SMRT Route 20 (formerly Breeze 200) operates weekdays from 5:30 A.M. to 7:15 P.M. and serves the cities of Santa Maria, Buellton, and Solvang with a single stop in the community of Los Alamos (Ferrini Park), and two stops in the community of Orcutt (Orcutt Road and Foster Road, Clark Avenue and Orcutt Road) (Breeze Bus 2020). SMRT also offers a shared ride Americans with Disabilities Act of 1990 (ADA) compliant door-to-door paratransit service for those whose disability prevents them from riding the ADA-accessible fixed-route bus.

SMRT also provides deviated fixed-route service within the Cuyama Valley and to the Orcutt and Santa Maria region via SMRT Route 50 (formerly Cuyama Transit). The County helps fund this service through Transportation Development Act funding. A single shuttle departs New Cuyama to destinations in Santa Maria twice a week (Tuesday and Thursday) at 9:00 A.M. and returns before dusk. As this is not a fixed route, passengers are picked up from New Cuyama and taken to their desired destinations in the Santa Maria-Orcutt area (SBCAG Traffic Solutions 2016).

Santa Barbara Metropolitan Transit District

MTD is an independent special district empowered under the California Public Utilities Code to provide public transit service on the South Coast. MTD provides fixed-route service in the cities of Santa Barbara, Carpinteria, and Goleta and the unincorporated areas of Isla Vista, Montecito, and Summerland, utilizing a fleet of 106 vehicles, including 74 diesel vehicles, 14 electric vehicles, and 18 hybrid vehicles (SBCAG 2021a). MTD provides service Monday through Sunday, beginning as early as 5:30 A.M. and running as late as midnight. MTD provides 42 transit routes through 719 bus stops (MTD 2022a). In 2018, MTD provided 6,288,980 passenger trips (MTD 2022a). Line 12x/24x is a key commuter line, connecting Goleta, UCSB, and Isla Vista with major employment centers in Goleta and downtown Santa Barbara.

Line 6 connects downtown Santa Barbara, UCSB, Isla Vista, and Goleta through 14 stops frequented every 30 minutes between 5:47 A.M and 9:05 P.M. on weekdays, 6:45 A.M. and 7:12 P.M. on Saturdays, and 6:15 A.M. and 7:12 P.M. on Sundays. This line creates the HQTC along Hollister Avenue and Eastern Goleta Valley.

Line 11 travels primarily down Hollister Avenue and provides connections between the Eastern Goleta Valley, downtown Santa Barbara, UCSB, and the community of Isla Vista through 21 stops frequented every 30 minutes between 6:00 A.M. and 12:23 A.M. on weekdays, 6:00 A.M. and 11:08 P.M, on Saturdays and 6:40 A.M. and 10:30 P.M. on Sundays. This line creates the HQTC along Hollister Avenue in the Eastern Goleta Valley.

Line 20 connects the City of Santa Barbara with the communities of Montecito and Summerland and the City of Carpinteria through 13 stops frequented every 30 minutes between 5:30 A.M. and 10:45 P.M. on weekdays, 6:30 A.M. and 10:40 P.M, on Saturdays and 6:45 A.M. and 8:45 P.M. on Sundays. Key stops on Line 20 include Milpas Street and Gutierrez Street, Coast Village Road and Hot Springs Road, Lillie Avenue and Evans Avenue (in Summerland), Carpinteria Avenue and 7th Street, Carpinteria Avenue and Palm Avenue, and Via Real and Mark Avenue, Ortega Hill Road and Evans Avenue (in Summerland), Milpas Street and Montecito Street (MTD 2022c).

As a public entity that provides non-commuter, fixed-route transit service, MTD is required by the ADA to provide complementary paratransit service for persons who are unable to use the fixed-route service. MTD contracts with Easy Lift to provide complementary paratransit service (SBCAG 2021).

City of Lompoc Transit (COLT) and Wine Country Express

The City of Lompoc manages the City of Lompoc Transit (COLT) transit system and contracts with a private operator for the operation of the fixed-route service. COLT serves the City of Lompoc and the unincorporated communities of Vandenberg Village and Mission Hills. COLT provides service Monday through Friday between the hours of 6:30 A.M. and 7:00 P.M. and on Saturdays between the hours of 9:00 A.M. and 5:00 P.M. COLT's Route 4, the only route that connects Lompoc with the communities of Vandenberg Village and Mission Hills, frequents eight stops (Mission Plaza, Allan Hancock College in Lompoc, Via Lato and Calle Lindero, Los Berros School in Mission Hills, Via Dona and Via Cortez, Mission Hills Market, Cabrillo High School in Vandenberg Village, Constellation and Jupiter), with each bus arriving roughly one hour apart between 6:45 A.M. and 6:50 P.M. and a second bus on hour intervals for Alan Hancock Village and Mission Plaza. The City of Lompoc also provides the Santa Barbara Shuttle and the Wine Country Express. The Santa Barbara Shuttle operates one round trip between Lompoc and Santa Barbara, with stops in Buellton on Tuesdays and Thursdays. The shuttle departs the Mission Plaza center in Lompoc at 8:30 A.M. and the return trip departs the Santa Barbara MTD Transit Center at 3:30 P.M. (City of Lompoc 2011). The Wine County Express connects the cities of Lompoc, Buellton, and Solvang with three round trips per day, Monday through Saturday. Neither the Santa Barbara Shuttle nor the Wine County Express offer stops in unincorporated communities. Buses depart at 7:15 A.M., 1:00 P.M., and 4:45 P.M., arriving at Solvang in about 35 minutes.



The Clean Air Express is an important commuter service in the County, providing early morning and late evening trips on weekdays between Lompoc and neighboring cities. Source: Clean Air Express

Santa Ynez Valley Transit (SYVT)

Santa Ynez Valley Transit (SYVT) is a joint powers authority (JPA) funded by the County and the cities of Buellton and Solvang. SYVT provides two fixed-

route services – the Express Route and Los Olivos Loop – and a demand-response service in the Santa Ynez Valley, including the cities of Buellton and Solvang and the unincorporated communities of Ballard, Los Olivos, and Santa Ynez. Fixed-route services are available Monday through Saturday from 6:30 A.M. to 7:00 P.M. The Express Route operates every 30 minutes from 6:30 A.M. to 7:00 P.M. frequenting 20 stops between Buellton, Solvang, and Santa Ynez. Stops in Santa Ynez include Santa Ynez Valley Union Highschool, Tribal Health Clinic, Chumash Casino, Cuesta Street and Pine Street, Edison Street and Sagunto Street, Sagunto Street and Meadowvale Road. The Los Olivos Loop operates every hour between 7:00 A.M. and noon, and 2:30 P.M. and 6:30 P.M. serving 18 stops between Solvang, Santa Ynez, and Los Olivos. Santa Ynez stops include Alamo Pintado Road and Old Mission Drive, Cottage Hospital, Sunny Fields Park, Alamo Pintado Road and Baseline Avenue, Refugio Road and Baseline Avenue, Samantha Drive and Refugio Road, and Santa Ynez Valley Union High School. Los Olivos stops include Santa Barbara Avenue and Alamo Pintado Avenue, Alamo Pintado Avenue and Grand Avenue, Grand Avenue and Alamo Pintado Road, and Refugio Road and Roblar Avenue. Demand-response services are offered every day to ADA-eligible individuals and the general public on Sundays. The City of Solvang is the service administrator for the JPA and contracts with a private operator for the operation of the service.

Clean Air Express

The Clean Air Express is a commuter-oriented peak-hour service that also provides non-peak-hour services. The Clean Air Express provides fixed-route commuter service from Lompoc to Goleta, Lompoc to Santa Barbara, Santa Maria/Buellton to Goleta, and Santa Maria/Buellton to Santa Barbara (Clean Air Express 2022). The Clean Air Express operates Monday through Friday from 5:00 A.M. to 6:50 P.M. with 13 daily round trips (Clean Air Express 2022). The Clean Air Express is managed by SBCAG and is funded by Measure A and the County of Santa Barbara.

Ventura County Transportation Commission (VCTC) Coastal Express

The Ventura County Transportation Commission (VCTC) Coastal Express is a service of Ventura County's Vista bus line serving peak hour commuters and non-peak hour users. The Coastal Express provides service between the cities of Camarillo, Oxnard, Ventura, Carpinteria, Santa Barbara, Goleta, and UCSB. Coastal Express stops in Goleta include:

- Cottage Hospital at Goleta Hollister Avenue/Patterson Street
- Hollister Avenue/Kellogg Avenue
- Hollister Avenue/Nectarine Avenue
- Cortona Avenue/Castilian Drive
- Cortona Avenue/Castilian Drive
- Castilian Street/Los Carneros Road
- Los Carneros Road/Karl Storz Way
- Hollister Avenue/Coromar Drive
- Hollister Avenue/Los Carneros Road
- Hollister Avenue/Pine Avenue
- Hollister Avenue/Kellogg Avenue

The Coastal Express does not provide stops to unincorporated Santa Barbara communities except for the Santa Barbara County Complex located in Eastern Goleta Valley at Honor Farm Road/Camino Del Remedio. This stop is serviced three times between 6:45 A.M. and 8:00 A.M. by a northbound bus and three times by a southbound bus between the hours of 4:00 P.M. and 5:15 P.M. The Coastal Express provides 11 different lines which operate between the hours of 4:00 A.M. to 8:00 P.M. Monday through Friday. The Coastal Express operates Saturday through Sunday between the hours of 8:30 A.M. and 8:00 P.M. (VCTC 2022). The Coastal Express is managed and funded jointly by the VCTC and SBCAG, with VCTC acting as the lead agency.



VCTC's Coastal Express provides early morning and afternoon peak hour weekday commuter services between the cities of Camarillo, Oxnard, Ventura, Carpinteria, Santa Barbara, Goleta, as well as to UCSB campus.
Source: VCTC Coastal Express

San Luis Obispo Regional Transit Authority (SLORTA) Route 10

San Luis Obispo Regional Transit Authority (SLORTA) Route 10 provides bidirectional, fixed-route, intercounty service between the cities of San Luis Obispo, Pismo Beach, and Arroyo Grande; the communities of Nipomo and Orcutt; and the City of Santa Maria. Route 10 operates Monday through Friday from 6:00 A.M. to 8:30 P.M., Saturday from 7:15 A.M. to 7:30 P.M., and Sunday from 8:15 A.M. to 5:30 P.M. The southbound route frequents 10 stops every hour on weekdays and every three hours on Saturdays, and every four hours on Sundays. The northbound route frequents eight stops every hour on weekdays, three hours on Saturdays, and every four hours on Sundays (SLORTA 2022). In the City of Santa Maria, Route 10 serves the SMRT Transit Center, the Amtrak station, the Greyhound station, Allan Hancock College, and Marian Medical Center. It also serves the Hagerman Softball Complex in Orcutt and the California Polytechnic State University (Cal Poly) in San Luis Obispo.

Easy Lift Transportation

Easy Lift, a 501(c)(3) non-profit organization, serves as the Consolidated Transportation Service Agency for south Santa Barbara County. Easy Lift provides Dial-A-Ride, Greatest Generation Accessible Transportation, Children's Accessible Transportation, and other services. Easy Lift also contracts with MTD to provide ADA complementary paratransit service to the South Coast (SBCAG 2021a).

SMOOTH Transportation

Santa Maria Organization of Transportation Helpers (SMOOTH) offers curb-to-curb pickup for senior residents of Santa Maria and the unincorporated community of Orcutt. SMOOTH is the Consolidated Transportation Services Agency (CTSA) for the Santa Maria Valley and currently comprises three operational divisions – non-emergency medical transportation, CTSA Services, and the Transit & Health Service Division. SMOOTH also operates the Santa Barbara Medical Bus from North County to Santa Barbara for non-emergency medical appointments as part of the SMOOTH Transit & Health Services Division.

Bicycle and Pedestrian Transportation Facilities

In addition to the roadway network and transit systems, the county's transportation network includes bicycle and pedestrian facilities, particularly in the more developed, urban areas of the county. Currently, the county is developed with approximately 350 miles of Class I, II, and III bikeways. The 2006 Caltrans Highway Design Manual defines these classes of bikeways:

- **Class I (Bike Path):** Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.
- **Class II (Bike Lane):** Provides a striped lane for one-way bike travel on a street or highway.
- **Class III (Bike Route):** Provides for shared use with pedestrian or motor vehicle traffic.
- **Class IV Bikeway:** A Class IV bikeway, also known as a cycle track, are exclusive bicycle infrastructure that is separated and protected from motorist traffic. Class IV bikeways can be separated from motor traffic lanes in various ways including grade separation, posts, barriers, or on-street parking.

Currently, the county is developed with approximately 34.3 miles of Class I bikeways, 136.2 miles of Class II bicycle lanes, and 167.8 miles of Class III shared-use (pedestrian and cyclists) bikeways (SBCAG 2015a). Table 3.14-5 below provides mileage of bikeways in unincorporated regions. Future bicycle-pedestrian improvements are described under *Planned Bicycle-Pedestrian Facility Improvements*.

The majority of existing bicycle facilities are located on the South Coast, which has or is located near some of the most extensively developed bicycle paths in the county. The existing bikeway system in Eastern Goleta Valley provides some Class I facilities with Class II bikeways contributing the most prevalent connections along major east-west and north-south roads. Class I bikeways running east-west through the south side of Eastern Goleta Valley provide recreational and bicycle commuter facilities along the coastal and agricultural areas of the South Patterson Agricultural Area. The Atascadero Creek Bikeway, or Obern Trail, consists of a designated bike route leading from Goleta Beach to near the intersection of Hollister Avenue and Modoc Road. A north-south Maria Ygnacio route leads from the intersection of Patterson Avenue and Shoreline Drive, under U.S. Highway 101, to northeastern Goleta, where the route connects to the North Goleta route. While the bicycle system is frequently used by the community the distance from commercial corridors presents a barrier to bicycle commuters with destinations in the cities of Goleta and Santa Barbara (County of Santa Barbara 2015).

Within the Santa Maria Valley, Orcutt has well-developed bicycle facilities, including Class II bikeways located along Bradley Road between Lakeview Road and Rice Ranch Road; along Lakeview Road between SR 135 and Bradley Road; along Clark Avenue between Telephone Road and SR 135; along Rice Ranch Road between Bradley Road and Orcutt Road; and along portions of Orcutt Road between Clark Avenue and Lakeview Road. Class III bikeways are also present along Foster Road between SR 135 and Blosser Road.

Table 3.14-5. Class I, II, and III Bikeways in the Unincorporated Communities (miles)

Location	Class I Off-Street Bike/ Multi-Use Paths	Class II On-Street Bike Lanes	Class III On-Street Bike Routes	Class IV On-Street Cycle tracks
Unincorporated Areas				
Ballard	0.0	0.2	0.0	0.0
Isla Vista	8.4	2.5	0.0	0.4
Los Olivos	0.0	1.8	0.0	0.0
Mission Hills	0.0	3.3	0.0	0.0
Montecito	0.3	3.1	0.0	0.0
Orcutt	0.0	6.4	0.0	0.0
Santa Ynez	0.0	3.0	0.0	0.0
Summerland	0.5	2.8	0.0	0.0
Toro Canyon	0.0	0.3	0.0	0.0
Vandenberg Village	0.0	0.6	0.0	0.0
All Other Incorporated Areas	14.2	21.7	0.0	0.0
Total	**50**	**173**	**6**	**3**

Source: SBCAG 2021b.

The pedestrian sidewalk and trail system span across the entirety of the county. Sidewalks are located on either side of the roadways within the developed areas of the county. Trails include unpaved paths that can accommodate both bicyclists and pedestrians. Trails also include multi-purpose trails, which may be designed in conjunction with paved bicycle facilities, as well as unpaved paths. Some unpaved paths and trails in the county are maintained, such as the Santa Maria River Levee Trail (Tom Urbanske Trail), but many others are not. These may include trails through parks that serve utilitarian as well as recreational purposes.

Planned Bicycle-Pedestrian Facility Improvements

SBCAG adopted a Regional Active Transportation Plan (ATP) (2015) to help guide the construction of new bicycle and pedestrian-related infrastructure. The purpose of the ATP is to create a regional vision for improving the bicycle and pedestrian network in the county by integrating the bicycle and pedestrian planning of the region's nine-member governments. The plan is also intended to establish a base level of eligibility for funding through ATP grants for projects in the plan area.

Per the ATP, new bicycle-related infrastructure planned projects include 25 projects in the unincorporated areas of the Santa Maria Valley adding approximately 40 miles of new bicycle paths; 13 projects in the unincorporated areas of the Lompoc Valley adding 18 miles of new bicycle paths; six projects in the unincorporated areas of the Santa Ynez Valley adding 12 new miles of bicycle paths; 27 projects in the unincorporated communities of the South Coast, 12 of which would occur in Eastern Goleta Valley, adding 7 miles of new bicycle paths.

Planned bicycle lane improvements in the Santa Maria Valley would occur along primary and secondary roadways in Orcutt such as Clark Avenue, Rice Ranch Road, Union Valley Parkway, Orcutt Creek, Solomon Road, Orcutt Road, and Blosser Road, among others. Planned improvements in the Lompoc Valley would occur along major roadways such as SR 246 and Purisima Road among others.

Planned pedestrian and bike improvements in the Santa Ynez Valley would occur along SR 154, Edison Street, Pine Street, Baseline Road, and the Santa Ynez River. Planned Improvements in Eastern Goleta Valley would occur along major primary and secondary roadways such as Patterson Avenue, San Simeon Drive, and El Sueno Road, among others.

The County recently adopted an Active Transportation Plan (ATP) in May 2023. The County ATP focuses on future bike and pedestrian improvements within the public right-of-way in the unincorporated communities of Santa Barbara County. The ATP identifies over $50 million in future improvements throughout the region.

Other Transportation Services

SBCAG offers a variety of commuter services through its Traffic Solutions Division. Santa Barbara County's regional rideshare organization, Traffic Solutions encourages commuters to choose commuting options other than driving to work alone through marketing and public outreach, incentive programs, and by acting as an information resource.

Carpool and Vanpool

SBCAG maintains smartride.org to link passengers with other interested carpoolers. Commuters can also find or advertise a vanpool seat.

E-bike

Residents can reserve electric bikes for an hour or a weekend through the SBCAG Traffic Solutions E-bike Program. Renters can choose from a selection of 15 models. The EZ Bike Project is located at the Bike Spot, a City of Santa Barbara self-serve valet bike parking facility at 1219 Anacapa Street in Downtown Santa Barbara, and the SBCAG Regional Transit Facility at 6414 Hollister Avenue in Goleta.

Ride-Hailing Services

Ride-hailing services allow riders to hail a ride (e.g., similar to a taxi ride) through a mobile app. Several ride-hailing operators operate within the county and incorporated cities, providing users with curb-to-curb service. Lyft and Uber have become the most recognized and ubiquitous forms of shared mobility and provide both local and to some extent regional linkages, although contribute to roadway congestion.

Shared Micro-Mobility

Several private micro-mobility providers operate within the county and incorporated cities, providing residents and guests with shared bikes, e-bikes, and scooters to utilize throughout the public right-of-way. The County has instituted a permit process to allow shared micro-mobility devices through amendments to the existing County Code. The ordinance amends provisions for permitting and regulation of vendors, vehicles, and shared mobility device operations via the encroachment permit process of the Public Works Department and collection of fees for their use of County right-of-way. Micro-mobility providers are currently only operating in Isla Vista, although the ordinance allows their use in other areas as well and is intended to cover operations such as outdoor dining, car share programs, and shared mobility devices that include bicycles, scooters, and other vehicle fleets.

Emergency Access

The County has several routes that provide emergency access throughout the county, including U.S. Highway 101, SR 1, SR 33, SR 135, SR 166, and SR 246, as well as various streets and single-access residential development roads (County of Santa Barbara 2023). For additional information, see Section 3.16.2.6, *Evacuation and Emergency Response*. As described further in Section 3.14.4.1, *Thresholds of Significance* issues related to emergency vehicle access are discussed in Section 3.16, *Wildfire*.

Countywide Mobility Patterns and Trends

VMT is a measure of the number of vehicle trips and distances that residents, employees, or visitors drive, determined by multiplying the total number of trips generated by the average length of the trips measured in miles. VMT per capita is calculated as the total annual miles of vehicle travel divided by the total population in the planning area. The County estimates VMT using the following metrics:

- **Total VMT:** VMT generated by all land uses in a defined geographic area. Total VMT reflects all vehicle trips (passenger and commercial vehicles) assigned on the roadway network.
- **Total VMT per Service Population:** VMT generated by all land uses in a defined geographic area divided by the total number of residents and the total number of employees in the geographic area. VMT per service population reflects all vehicle trips (passenger and commercial vehicles) assigned on the roadway network.
- **Home-based VMT per Resident:** VMT generated from travel between residents' homes and other destinations, such as work, school, or household errands, in a defined geographic area divided by the total number of residents in the geographic area. This metric excludes trips between two non-residential locations, such as from the store to the coffee shop. Home-based VMT per resident reflects all passenger vehicles (cars and light-duty trucks) assigned on the roadway network.
- **Home-based Work VMT per Employee:** VMT generated from travel between employees' homes and work in a defined geographic area divided by the number of employees in the geographic area. Home-based work VMT per employee reflects all passenger vehicles (cars and light-duty trucks) assigned on the roadway network.

Countywide VMT

Based on the most recent publicly available data, Caltrans estimated a total of 8.6 million daily VMT in 2020 in Santa Barbara County, which results in an annual VMT of 3.1 billion. The U.S. Census Bureau estimates the county had a population of 448,200 in 2020. As such, countywide annual VMT per capita in 2020 was 6,900 annual VMT per capita (approximately 18.9 daily VMT per capita) (Caltrans 2021). Table 3.14-6 provides existing data on daily County VMT. As shown, the vast majority of daily VMT occurs over state-owned highways as these are major commuter routes.

A majority (approximately 68.1 percent) of the employed population in the county drove to work alone in 2020. A smaller portion of the population carpooled (13.1 percent) and took public transit (2.9 percent) to work. Approximately 3.9 percent of the county's population walked to work, 3.1 percent biked, and 0.8 percent took a taxi, rode a motorcycle, or chose other means of transportation. Approximately 8.0 percent of the County population worked at home. The average

vehicle occupancy (AVO) of workers who drove (alone or carpool) was 1.1 persons per vehicle, higher than the state AVO (U.S. Census Bureau 2020).

Table 3.14-6. Santa Barbara County Daily VMT

Jurisdiction	Daily Vehicle Miles of Travel (VMT) [1,000]		
	Rural	Urban	Total
Other			
County	495.55	732.51	1,228.06
State Highways	2,120.27	3,536.60	5,656.87
State Park Service	12.36	0.36	12.72
Bureau of Indian Affairs	--	0.71	0.71
U.S. Forest Service	48.88	0.06	48.94
County Total	**2,680.72**	**5,915.74**	**8,596.47**

Source: Caltrans 2021

A VMT Impact Analysis Report (VMT Report; Appendix F) was prepared for the proposed Project to quantify baseline VMT data for the county as a whole and by HMA. The SBCAG Regional Transportation Demand Model (RTDM) estimates VMT for 2015 and 2050 conditions for the Connected 2050 RTP/SCS. SBCAG also has an interim year model that reflects forecasted 2035 conditions in the region. The VMT Report interpolates between the 2015 and the 2035 interim year to establish VMT values for 2023. The VMT Report calculates a total of 7.7 million daily VMT for unincorporated Santa Barbara County, which results in an annual VMT of 2.8 billion. With a service population of 194,854, unincorporated Santa Barbara County has a 39.5 VMT per capita. Average daily vehicle trips exceed 793,000.

Table 3.14-7. Santa Barbara County Daily VMT

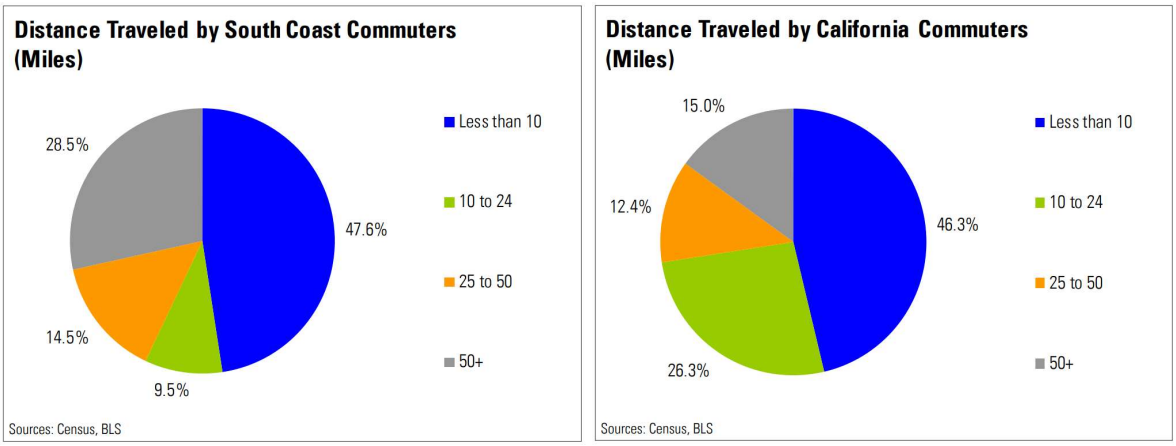
Metric	Countywide	Housing Market Area				
		South Coast	Lompoc Valley	Santa Ynez Valley	Santa Maria Valley	Cuyama Valley
Residents	144,087	123,450	19,353	14,272	68,693	6,607
Employees	50,767	25,876	8,929	8,880	15,930	1,244
Service Population	194,854	149,327	28,282	23,152	84,624	7,851
Total Daily VMT	7,705,069	4,134,326	1,461,161	1,056,751	2,109,612	280,342
Total VMT per Service Population	**39.5**	**27.7**	**51.8**	**45.6**	**24.9**	**35.7**

Source: Fehr & Peers 2023; Appendix F.

When considered by HMA, total VMT ranges from 280,342 in Cuyama Valley to 4,134,326 in the South Coast. However, given the distribution of residents and employees throughout the county the VMT per service population is smallest in Santa Maria Valley and South Coast (24.9 and 27.7, respectively) and highest in Santa Ynez Valley and Lompoc Valley (45.6 and 51.8, respectively). This total VMT per service population ratio indicates that the South Coast and Santa Maria Valley are job centers and provide transportation services that support fewer, shorter vehicle trips.

Countywide Commute Patterns

The Connected 2050 RTP/SCS was developed to explore the region's land use and travel patterns, account for the demographic growth that will force new demands on both and present a vision for how they can work together to satisfy the goals important to the region while also meeting the state's GHG reduction targets (SBCAG 2021a).



Compared with the statewide average, nearly twice the share of people employed in the South Coast drove more than 50 miles to work, representing a total of approximately 31,300 workers, as of 2019 (Rosen et al. 2022).

Between 2010 and 2019 (the latest data available), the share of South Coast workers commuting more than 50 miles to work grew by nearly one-third, according to the U.S. Census Bureau and Bureau of Labor Statistics (Rosen et al. 2022). Compared with the statewide average, nearly twice the share of people employed on the South Coast drove more than 50 miles to work, representing a total of approximately 31,300 workers, as of 2019 (Rosen et al. 2022). According to SBCAG (2019), a total weekday average of 15,000 commuters travels from Ventura and Los Angeles counties to their employment locations in Santa Barbara County.

Net in-commuting[1] more than doubled in the 20-year timeframe between 1990 and 2010 from 5,000 to 11,000. The regional growth forecast for the county assumes the number of net in-commuters to double over the 40-year forecast period from 11,000 in 2010 to 22,000 by 2050, in part due to housing stock limitations in available units and cost affordability in the county (SBCAG 2021a). Approximately 41 percent of peak period trips on U.S. Highway 101 are commute trips. Consistent with this data, the American Community Survey (ACS) estimates approximately 32 percent of residents in the North County commuted for at least 30 minutes to a job compared to 13 percent of residents living on the South Coast. The 2019 county average commute time was 20.5 minutes (U.S. Census Bureau 2019); however, commute times have continued to increase in recent years.



Multiple improvement projects are planned to relieve congestion along U.S. Highway 101. Key planned improvements include widening a segment from the City of Carpinteria to the City of Santa Barbara to three lanes.
Source: Google Earth

This major increase in commuting has driven major improvements to SR 154 and SR 1, as well as being a major factor contributing to the need for more than $1 billion in improvements to U.S. Highway 101 between Ventura and the City of Santa Barbara. Such large numbers of long-distance commuters have required further governmental expenditures to provide long-distance bus services such as the Clean Air Express from the North County and the Coastal Express from Ventura County, as well as initiating new Amtrak commuter rails service from Ventura County.

3.14.2.2 Future Transportation Network Improvements

SBCAG has adopted the Connected 2050 RTP/SCS, updating the previous 2040 RTP/SCS, which was originally adopted in 2013. The Connected 2050 RTP/SCS covers the entire area of Santa Barbara County and includes the cities of Santa Barbara, Carpinteria, Goleta, Lompoc, Buellton, Santa Maria, Solvang, and Guadalupe, as well as the unincorporated communities. Capital improvement projects identified in the Connected 2050 RTP/SCS are located on state highways, county roads, and locally owned streets, as well as on transit district property and public utility lands. Some of the improvement projects are intended as maintenance and rehabilitation projects aimed at improving the existing infrastructure and transportation networks (e.g., bicycle, pedestrian, and bus lines).

The Connected 2050 RTP/SCS plans how regional transportation needs will be for the 30 years from 2021 to 2050, considering existing and projected future land use patterns, as well as forecast population and job growth. The Connected 2050 RTP/SCS plans for and programs approximately $11.3 billion in revenues expected to be available to the region from all transportation funding sources throughout the planning period. It identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as transportation demand management measures and intelligent

[1] Inflow of commuters from outside Santa Barbara County.

transportation systems. Major regional projects identified in the Connected 2050 RTP/SCS include the U.S. Highway 101 widening project, SR 166 safety improvements, several bridge replacements, construction of the Goleta Train Depot, and construction of multi-use paths and trails, among others.

Other future transportation improvements are identified in the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan, the County's Capital Improvement Program (CIP), including the Eastern Goleta Valley and Orcutt Transportation Improvement Plans (TIPs), the County's ATP, and the County's Road Maintenance Annual Plan (RdMAP). Current improvements that are being prioritized include widening segments of U.S. Highway 101 as well as widening of Union Valley Parkway and improvements to the Hollister-State Street Corridor. Capital improvement projects identified in the Connected 2050 RTP/SCS include utilizing Measure A funds and supplementing other funding to improve traffic operations throughout the County including the maintenance of signs, striping, guardrails, and intersection and bikeway signals and lighting, providing maintenance, repair, construction of bike and pedestrian facilities. Other projects would supplement funding to provide roadway maintenance and repair; pavement preservation; and bridge and large culvert projects throughout the County although details of these improvements and specific locations are not yet known.

3.14.3 Regulatory Setting

Federal, state, and local regulations have been enacted to address transportation in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.14.3.1 Federal

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the ADA have been codified in Title 42 of the U.S. Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in places of public accommodation (i.e., businesses and non-profit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility.

Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

Infrastructure Investment and Jobs Act

Among other areas of infrastructure investment, the bill will provide funding for America's public transit infrastructure. In total, the new investments and reauthorization in the Bipartisan Infrastructure Law (2021) provide $89.9 billion in guaranteed funding for public transit over the next 5 years. The legislation will expand public transit options across every state in the country, replace thousands of deficient transit vehicles, including buses, with clean, zero-emission vehicles, and improve accessibility for the elderly and people with disabilities.

3.14.3.2 State

Senate Bill (SB) 743, VMT Analysis (Public Resources Code Section 21099)

To further the state's commitment to the goals of SB 375, Assembly Bill (AB) 32, and AB 1358, Governor Brown signed SB 743 on September 27, 2013. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Division 13 (Section 21099) of the Public Resources Code. Key provisions of SB 743 include eliminating the measurement of vehicle delay, or LOS, as a metric that can be used for measuring traffic impacts. Under SB 743, the focus of transportation analysis shifts from LOS to VMT and the reduction of GHG emissions through the creation of multimodal transportation networks and the promotion of a mix of land uses to reduce VMT. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly for areas served by transit (i.e., transit priority areas [TPAs]), those alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates or automobile trips generated." OPR also has the discretion to develop alternative criteria for areas that are not served by transit, if appropriate.

Pursuant to the mandate in SB 743, OPR adopted the revised CEQA Guidelines in December 2018, recommending the use of VMT for analyzing transportation impacts under CEQA. In turn, Section 15064.3 was added to CEQA Guidelines, which states "generally, vehicle miles traveled is the most appropriate measure of transportation impacts." The revised guidelines require that lead agencies remove automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, as a criterion for determining a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact."

As noted below, in 2020, the County adopted VMT as part of its *Environmental Thresholds and Guidelines Manual*, shifting away from LOS-based metrics. Specifically, Chapter 18, *Thresholds of Significance for Transportation Impac*ts, now contains standardized VMT metrics, VMT screening criteria, VMT thresholds of significance, and VMT mitigation measures tailored to the unincorporated areas of the county. The screening criteria and thresholds of significance are now in effect for projects that are subject to CEQA and located within the unincorporated areas of the county.

Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006

Transportation is the largest single sector of the economy that generates GHGs, and changes in transportation are a focus of several statewide regulations to reduce VMT and increase access to non-vehicular modes of travel. The Global Warming Solutions Act (AB 32) commits the State of California to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 acknowledges that such emissions cause significant adverse impacts to human health and the environment, and therefore must be identified and mitigated where appropriate. Achieving these goals requires a reduction of approximately 30 percent from projected state emission levels and 15 percent from 2006 state levels, with even more substantial reductions required in the future. Pursuant to AB 32, the California Air Resources Board (CARB) must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

Senate Bill (SB) 375, California's Sustainable Communities and Climate Protection Act

The adoption of SB 375 on September 30, 2008, recognizes the connection between land use planning and reliance on vehicles as the primary mode of transportation, with the result being that emissions from vehicles account for 30 percent of GHG emissions in California. SB 375 aligns the goals of regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations, and requires Metropolitan Planning Organizations (MPOs), such as SBCAG, to adopt an SCS or Alternative Planning Strategy (APS) within their RTP to demonstrate achievement of GHG reduction targets. As discussed below, in compliance with SB 375, SBCAG has adopted the Connected 2050 RTP/SCS, which guides land use and transportation planning for the region to reduce transportation related GHG emissions.

Assembly Bill (AB) 1358, the California Complete Streets Act of 2008

Governor Schwarzenegger signed AB 1358 into law on September 30, 2008. AB 1358 requires cities and counties to modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users, including bicyclists, pedestrians, transit riders, children, older people, and disabled people, as well as motorists.

Executive Order B-30-15 and SB 32

Executive Order B-30-15 established a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. This Executive Order acts as an intermediate goal to achieve 80 percent reductions by 2050 as outlined in Executive Order S-3-05. Additionally, this Executive Order aligns California's GHG reduction targets with those of leading international governments, including the 28 nations comprising the European Union. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal established by Executive Order S-3-05 of reducing emissions to 80 percent under 1990 levels by 2050. (Refer to Section 3.7, *Greenhouse Gas Emissions* for further discussion regarding GHG emissions.)

Statewide Transportation Improvement Program

The California Transportation Commission (CTC) administers transportation improvement programming. Transportation programming is the public decision-making process, that sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The State Transportation Improvement Program (STIP) is a multi-year CIP for transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources. Caltrans manages the operation of state highways, including highways passing through the county.

The Mitigation Fee Act

Government Code Sections 66000-66025 (Mitigation Fee Act) authorizes local government agencies to impose mitigation fees alongside new development projects to meet the cost of new or additional public facilities that will be needed to serve those developments.

California's 2022 Scoping Plan Update

CARB is responsible for the coordination and administration of both federal and state air pollution control programs within California. In December of 2022, CARB published and approved the 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan), which assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. In the transportation sector, GHG emissions-reducing measures include transitioning to zero-emission technology, supplying zero-carbon alternative fuel, and strategies to promote sustainable communities and improved transportation choices that result in curbing the growth in VMT.

Relative to transportation, the Scoping Plan includes measures to reduce VMT and vehicle generated GHGs. Strategies to achieve this include:

- Achieve a per capita VMT reduction of at least 22 percent below 2019 levels by 2045.
- Implement equitable roadway pricing strategies based on local context and need, reallocating revenues to improve transit, bicycling, and other sustainable transportation choices.
- Reimagine new roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Invest in making public transit a viable alternative to driving by increasing affordability, reliability, coverage, service frequency, and consumer experience.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Channel the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations.
- Streamline access to public transportation, through programs such as the California Integrated Travel Project. Ensure alignment of land use, housing, transportation, and conservation planning in adopted regional plans, such as RTPs, SCSs, Regional Housing Needs Allocations (RHNAs), and local plans (e.g., general plans, zoning, and local transportation plans), and develop tools to support the implementation of these plans.
- Accelerate infill development and housing production at all affordability levels in transportation-efficient places, with a focus on housing for lower-income residents.

3.14.3.3 Local

Santa Barbara County Association of Governments (SBCAG) Connected 2050 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

SBCAG's Connected 2050 RTP/SCS is a long-range transportation plan that sets forth how the region will meet its transportation needs over the next 30-year period through 2050. The RTP/SCS assesses various alternative future scenarios and continues the vision laid out in the prior versions of the RTP/SCS adopted in 2013 and 2017. Existing and future land use patterns and forecasted population and job growth were used to identify and prioritize transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as transportation demand management measures and intelligent transportation systems. The following list summarizes

the most applicable goals and policies that would relate directly to the Housing Element Update and associated physical environmental impacts.

Goal 1, Environment: Foster patterns of growth, development and transportation that protect natural resources and lead to a healthy environment.

Policy 1.1 Land Use: The planning, construction, and operation of transportation facilities shall be coordinated with local land use planning and should encourage local agencies to:

- Make land use decisions that adequately address regional transportation issues and are consistent with the RTP/SCS.
- Promote better balance of jobs and housing to reduce long-distance commuting by means of traditional land use zoning and other, unconventional land use tools, such as employer-sponsored housing programs, economic development programs, commercial growth management ordinances, average unit size ordinances and parking pricing policies.
- Plan for transit-oriented development consistent with the RTP/SCS by:
    - concentrating residences and commercial centers in urban areas near rail stations, transit centers and along transit development corridors.
    - designing and building "complete streets" serving all transportation modes that connect high-usage origins and destinations.

Goal 2, Mobility and System Reliability: Optimize the transportation system to improve accessibility to jobs, schools, and services, allow the unimpeded movement of people and goods, and ensure the reliability of travel by all modes.

Policy 2.1 Access, Circulation and Congestion: The planning, construction, and operation of transportation facilities shall strive to:

- Enhance access, circulation, and mobility throughout the Santa Barbara region and between neighboring regions.
- Reduce congestion, especially on highways and arterials and in neighborhoods surrounding schools in cooperation with schools and school districts.
- Reduce travel times to be consistent with the adopted Congestion Management Plan for all transportation modes, with equal or better travel times for transit and rail in key corridors.

Policy 2.2 System Maintenance, Expansion and Efficiency: Transportation planning and projects shall:

- Promote the maintenance and enhancement of the existing highway and roadway system as a high priority.
- Strive to increase the operational efficiency of vehicle usage through appropriate operational improvements (e.g., signal timing, left turn lane channelization, and ramp metering).
- Preserve existing investments in the system by emphasizing life cycle cost principles in investment decisions (i.e., account for capital and annual maintenance costs) in order to reduce overall costs of transportation facilities.

- Promote TDM, e.g., through appropriate commute incentive programs, to reduce demand and improve efficiency.
- Increase the capacity of the existing highway and roadway system through the provision of additional traffic lanes only when (1) an existing facility is projected in the near term to no longer provide an acceptable level of service as determined by the standards established in the Congestion Management Plan (CMP), and (2) alternative means of capacity enhancement and measures to increase efficiency of usage have been explored.

Policy 2.6 Consistency with Other Plans: The planning, construction, and operation of transportation facilities and of the system as a whole shall be consistent with (1) the California Transportation Plan, (2) SBCAG's Transportation Connections: The Public Transit Human Services Transportation Plan for Santa Barbara County, (3) adopted local General Plans, and (4) other regional policies.

Goal 3, Equity: Ensure that the transportation and housing needs of all socio-economic groups are adequately served.

Policy 3.2: SBCAG shall encourage local agencies to:

- Address and plan for forecast regional housing needs for all economic segments of the population.
- Plan for adequate affordable and workforce housing within existing urbanized areas near jobs and public transit.
- Consider transit availability and accessibility as an integral element of land use planning and project permitting, with special emphasis on serving the disabled, elderly, and other transit-dependent communities.
- Recognize that housing provided by colleges and universities is an important component of addressing the region's overall housing needs, which should be taken into account in local agencies' own housing plan.

Goal 5, Prosperous Economy: Achieve economically efficient transportation patterns and promote regional prosperity and economic growth.

Policy 5.1 Commuter Savings: The RTP/SCS shall strive to reduce average commute time and cost by encouraging measures that bring worker housing closer to job sites.

Santa Barbara County Association of Governments (SBCAG) Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan

In 2006, in recognition that congestion has diminished the quality of life and economic vitality of the county's South Coast, SBCAG developed the "101 in Motion" program, which consisted of short- and long-term solutions to reduce congestion along U.S. Highway 101 in the South Coast. One of the primary strategies to address congestion was to add a High Occupancy Vehicle (HOV) lane on U.S. Highway 101, and in 2018, SBCAG and Caltrans were awarded funds through Cycle 2 and Cycle 3 of SB 1's Solutions for Congested Corridors Program by that the CTC is currently being used to construct HOV improvements along U.S. Highway 101 from Carpinteria to Santa Barbara.

Consistent with the guidelines adopted by the CTC for projects funded through Cycle 2 and Cycle 3 of SB 1, SBCAG prepared the Hybrid Multimodal Corridor Plan in 2019. The objective of the Hybrid Multimodal Corridor Plan was to demonstrate that various plans, including the 101 in Motion

program, the Connected 2050 RTP/SCS, and the CMP, as well as public input, were considered in the process of developing and implementing congestion relief projects.

In 2022, SBCAG prepared and adopted the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan as an update to the 2019 Hybrid Multimodal Plan. As summarized in the plan, the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan directly aligns with the Connected 2050 RTP/SCS as it uses the goals and objectives from the RTP/SCS as guiding principles. Further, the congestion relief projects were included in the RTP/SCS as fiscally constrained projects, were included in the environmental evaluation of the RTP, and are part of the region's SCS.

Santa Barbara County Association of Governments (SBCAG) Regional Active Transportation Plan (ATP)

SBCAG adopted the Regional ATP in 2015 to integrate the bicycle and pedestrian planning of the region's nine-member governments and improve the active transportation network in the County. The Regional ATP was initially conceived as a Regional Bikeway Plan; however, in response to evolving state guidelines, the scope of the plan was broadened to include the pedestrian mode. The plan was prepared to meet the requirements of the CTC's 2014 Active Transportation Program Guidelines. The purpose of the plan is to create a regional vision for improving the bicycle and pedestrian network by integrating the bicycle and pedestrian planning of the region's nine-member governments. The plan is also intended to establish eligibility criteria for funding through Active Transportation Program grants for projects. The major goals of the plan are to:

1. **Enhance Mobility:** Promote increased bicycling and walking to reduce vehicle trips, vehicle miles traveled, auto congestion, and vehicle emissions regionwide.
2. **Increase Connectivity:** Promote increased bicycling and walking to reduce vehicle trips, vehicle miles traveled, auto congestion, and vehicle emissions regionwide.
3. **Promote Equity for All Users in All Communities:** Increase bicycle and pedestrian network coverage within RTP/SCS communities of concern.
4. **Improve Safety and Public Health:** Encourage well-designed bicycle and pedestrian infrastructure to improve multi-modal safety and promote improvements in public health.

Santa Barbara County Association of Governments (SBCAG) Santa Ynez Valley Bicycle Master Plan

In 2019, SBCAG adopted the Santa Ynez Valley Bicycle Master Plan to fill a gap in subregional bicycle planning within the unincorporated Santa Ynez Valley, as well as in the incorporated cities of Buellton and Solvang. The major goals of the plan are to:

1. Establish a safe and secure bicycle network that addresses key areas of concern including highways, intersections, and routes to school.
2. Provide infrastructure throughout the region to encourage bicycling.
3. Develop a well-planned and coordinated network between origins and destinations such as schools and residential areas, community centers, transit stops, park & rides, and neighboring jurisdictions.
4. Provide equitable access to bicycling for all.

5. Recognize the economic importance of bicycling in the region as it relates to tourism and stimulates the local economy.

County of Santa Barbara Climate Action Planning

As described further in Section 3.7, *Greenhouse Gas Emissions*, the County adopted its Energy and Climate Action Plan (ECAP) in 2015. The ECAP established a goal of reducing GHG emissions in the unincorporated parts of the county to 15 percent below 2007 levels by 2020 and identified 53 emissions reduction measures (ERMs) to achieve this goal (County of Santa Barbara 2015). After the County did not meet the 2020 GHG emission reduction goal contained within the ECAP, the County began work updating the ECAP, GHG emissions forecasts, reduction targets, and GHG emissions reduction programs and policies as part of the Santa Barbara County 2030 Climate Action Plan. The County published the Draft 2030 Climate Action Plan for public review and comment in March 2023, and expects to adopt the plan in late 2023 (County of Santa Barbara 2022). The 2030 Climate Action Plan includes updated GHG emissions forecasts, as well as goals and policies for reducing countywide GHG emissions below adopted targets by 2030, with the ultimate goal of achieving carbon neutrality by 2045. Measures and goals outlined in the CAP relating to transportation include:

Measure TR-1: Increase the use of zero-emission vehicles.

Measure TR-2: Increase affordable housing and mobility options.

Measure TR-3: Decarbonize off-road emissions.

Santa Barbara County Comprehensive Plan – Circulation Element

State law requires that any development in the county must be consistent with the Santa Barbara County Comprehensive Plan. The Circulation Element applies to all roadways and intersections within the unincorporated area of the county, except for those roadways and intersections located within an area included in an adopted community or area plan. The Circulation Element of the Comprehensive Plan provides specific policies related to traffic and transportation implications of the proposed development and establishes guidelines to determine the project-related traffic impacts on County roadways. The following policies are provided in the Circulation Element of the Comprehensive Plan.

A. The roadway classifications, intersection levels of service, and capacity levels adopted in this Element shall apply to all roadways and intersections within the unincorporated area of the county, with the exception of those roadways and intersections located within an area included in an adopted community area plan. Roadway classifications, intersection levels of service, and capacity levels adopted as part of any community or area plan subsequent to the adoption of this Element shall supersede any standards included as part of this Element.

    1) For the communities of Summerland, Montecito, Goleta, Los Alamos, Mission Canyon, Orcutt and the area of Toro Canyon, and the Santa Ynez Valley area please see the Circulation chapters of the Summerland, Montecito, Goleta, Los Alamos, Mission Canyon, and Orcutt Community Plans and the Toro Canyon Plan and Santa Ynez Valley Community Plan sections of the Coastal Land Use Plan and the Land Use Element of the Comprehensive Plan for the specific Policies and Actions which implement this policy.

2) For the community of Los Alamos, please see the Circulation chapter of the Los Alamos Community Plan section of the Comprehensive Plan's Land Use Element for specific policies and actions that implement this policy.

B. Individual community and area plans adopted subsequent to this Element shall strive to achieve a balance between designated land uses and roadway and intersection capacity. These community and area plans shall identify areas where increased traffic may create noise levels that could potentially exceed the policies and standards of the Noise Element of the Comprehensive Plan and to the extent feasible, include policies, land use changes, and other mitigations to reduce these impacts to insignificance.

C. The County shall continue to develop programs that encourage the use of alternative modes of transportation including, but not limited to, an updated bicycle route plan, park and ride facilities, and transportation demand management ordinances.

D. The County shall maintain a 7-year Capital Improvement Plan. The Plan shall be updated by the Public Works Department and presented to the Planning Commission and the Board of Supervisors for review at a public hearing before each body on an annual basis. The Plan shall contain a list of transportation projects to be undertaken ranked in relative priority order and include estimated cost, and if known, estimated delivery year for each project.

E. A determination of project consistency with the standards and policies of this Element shall constitute a determination of project consistency with the Land Use Element's Land Use Development Policy #4 with regards to roadway and intersection capacity.

1) For reference from the County's Land Use Element, Land Use Development Policy # 4 states that the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources, including roads and transportation, are available to serve the proposed development prior to issuance of a development permit and that the applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.

In addition, the Circulation Element applies standards to projects within the unincorporated area that create impacts to over-capacity intersections within incorporated cities. The Circulation Element defines intersection standards in terms of LOS and provides a methodology for determining project consistency with these standards. Within the County, roadway LOS is determined based on the roadway classifications and corresponding design capacities established by the County Comprehensive Plan Circulation Element and local Community Plan Circulation Elements. These Circulation Elements describe a variety of different types of capacities for applicable County roadways including the policy capacity, design capacity, and acceptable capacity. Table 3.14-1 describes the road classification system used by the County.

Community Plans

Santa Barbara County has 10 community or area plans. Each community plan contains goals, objectives, policies, action/programs, and development standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. A policy is a

specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed. Several community plans – including the Eastern Goleta Valley Community Plan, the Orcutt Community Plan, and the Santa Ynez Valley Community Plan, include policies related to VMT, multi-modal transportation planning, and active transportation modes.

Eastern Goleta Valley Community Plan

The Eastern Goleta Valley Community Plan updates the Santa Barbara County Comprehensive Plan for the unincorporated area of Eastern Goleta Valley and sets goals, policies, programs, actions, and development standards for all future development in Eastern Goleta Valley. The transportation and circulation element identifies transportation goals, objectives, policies, programs, and standards to address the community's vision for sustainable land use and transportation related to cyclists, pedestrians, and public transit riders, and streetscape design and parking. Transportation recommendations include complete street improvements and improved connectivity.

Policy EGV-4.2: Development shall be sited and designed to provide maximum access to non-motor vehicle forms of transportation, including well-designed walkways, sidewalks, and paths and trails between residential development and adjacent and nearby commercial uses and employment centers wherever safe and feasible.

Policy EGV-7.2: The County shall work with the Cities of Goleta and Santa Barbara to plan and develop interconnected regional transportation facilities to serve commuters and enhance access to multimodal transportation options.

Policy TC-EGV-1.4: Improved access to retail, commercial, recreational, and educational facilities via public transit, bikeways and pedestrian facilities shall be considered in public and private transportation and circulation planning for Eastern Goleta Valley.

Policy TC-EGV-1.5: Complete Streets: Multimodal Complete Streets shall be developed and maintained to maximize safety, accessibility, and connectivity of all modes of transportation to each other and to the places people need to go. Complete Streets are designed to optimize the utility, safety, and attractiveness of the transportation network to all users of the facilities. Transportation planning should strive to create attractive and accessible streets for all users, including drivers, bicyclists, public transportation vehicles and riders, and pedestrians of all ages and abilities.

Policy TC-EGV-1.6: The following roadways shall be defined as Eastern Goleta Valley Community Corridors and prioritized for multimodal Complete Street improvements in County transportation project planning for Eastern Goleta Valley (Figure 19):

1. Hollister Avenue – State Street from the City of Goleta to the City of Santa Barbara
2. Calle Real from the City of Santa Barbara to its western terminus
3. Turnpike Road from Cathedral Oaks Road to its southern terminus

Policy TC-EGV-1.7: Human-scale design standards within commercial zones and transit/pedestrian design standards for new residential and commercial development should be encouraged to increase the appeal of walking, bicycling, and using public transit and decrease traffic congestion on roadways.

Policy TC-EGV-1.9: All feasible measures to fully mitigate the transportation impacts associated with development projects, including new and innovative measures as may become available, shall be considered and encouraged.

Policy TC-EGV-1.8: In its long range land use planning efforts, the County shall seek to provide access to retail, commercial, recreational, and educational facilities via transit lines, bikeways and pedestrian trails.

Policy TC-EGV-2.7: Transit Riders: The County shall continue to work with public transit providers to ensure accessible public transit service and facilities to meet transit needs and increase ridership.

Goleta Community Plan

The Goleta Community Plan sets goals, policies, programs, actions, and development standards for all future development in the unincorporated Goleta community planning area, which currently comprises the unincorporated community of Isla Vista plus rural areas north of the City of Goleta Transportation recommendations include active transportation improvements and improved connectivity.

Policy CIRC-GV-2: The County shall develop and maintain a Transportation Improvement Plan which includes roadway, intersection, transit and alternative transportation mode (e.g., bike ways and pedestrian paths) improvements, with priority given to improvements that will ease congestion on the most constrained roadways and intersections in the planning area. The priority assigned to these improvements shall account for priorities identified in Community Plan, shall be based upon the most recent available traffic data and shall take into account maintenance requirements of existing improvements. The Transportation Improvement Plan shall be an integrated Plan for maintenance and capital improvements of roads and intersections as well as alternative transportation facilities. The Transportation Improvement Plan shall be updated by the Public Works Department and presented to the Planning Commission and the Board of Supervisors for review on an annual basis. The Plan shall contain a list of transportation projects to be undertaken, ranked in relative priority order, and include estimated cost, and if known, delivery year for each project including both funded and unfunded improvements.

Policy CIRC-GV-4: New development shall be sited and designed to provide maximum access to non-motor vehicle forms of transportation, including well designed walkways, paths and trails between new residential development and adjacent and nearby commercial uses and employment centers.

Policy CIRC-GV-5: The County shall facilitate the use of the bicycle as an alternate mode of transportation and shall provide adequate, safe bike-routes in the Goleta Area to meet the transportation and recreation needs of Goleta cyclists.

Policy CIRC-GV-6: In its long range land use planning efforts, the County shall seek to provide access to retail, commercial, recreational, and educational facilities via transit lines, bikeways and pedestrian trails.

Policy CIRC-GV-8: Developers shall be encouraged to pursue innovative measures to fully mitigate the transportation impacts associated with their projects.

Orcutt Community Plan

The Orcutt Community Plan updates the Santa Barbara County Comprehensive Plan for the unincorporated area of Orcutt and sets goals, policies, programs, actions, and development standards for all future development in Orcutt. The Transportation Section of the Orcutt Community Plan provides Orcutt street classifications. The Plan also outlines transportation policies and development standards and standards for the determination of project consistency. Transportation planning issues identified in the Orcutt Community Plan include a low jobs-to-housing ratio, high commuter trips for Orcutt residents, and a need for an extended bikeway system.

Policy CIRC-O-6: The County shall encourage development of all feasible forms of alternative transportation in the Orcutt/Santa Maria area.

Policy CIRC-O-8: The County shall ensure that the circulation system maintains the quality of life within residential neighborhoods in the Orcutt Planning Area to the greatest extent feasible.

Policy CIRC-O-9: Development shall be sited and designed to provide maximum access to non-motor vehicle forms of transportation, including well-designed walkways, paths, and trails between residential development and adjacent and nearby commercial uses and employment centers, where feasible.

Policy CIRC-O-10: Developers should be encouraged to pursue innovative measures to fully mitigate the transportation impacts associated with their projects.

Santa Ynez Valley Community Plan

The circulation section of the Santa Ynez Valley Community Plan updates the Santa Barbara County Comprehensive Plan for the unincorporated area of Santa Ynez Valley and sets goals, policies, programs, actions, and development standards for all future development in Santa Ynez Valley. The plan also identifies increasing congestion and safety concerns on SR 154 and SR 246 as the top transportation issues facing Santa Ynez Valley residents. These challenges are expected to be exacerbated by local and regional growth including job growth and residential development in the Santa Ynez Valley, as well as limited housing development and rising housing costs on the South Coast, and a limited job base in the Santa Ynez, Lompoc, and Santa Maria Valleys.

Policy CIRC-SYV-4: The County shall encourage development of all feasible forms of alternative transportation in the Santa Ynez Valley Community Plan Area.

Action CIRC-SYV-5.1: When updating the Bike Master Plan, the County shall work with Caltrans and Public Works to improve safety on the areas highways and roadways for recreational as well as commuter bicyclists.

Action CIRC-SYV-5.2: The County shall focus attention on improving bikeways within the townships near schools and recreation areas, and consider the safety and feasibility of extending a Class II bike lane on Highway 246 east of the Santa Ynez Valley High School.

County Active Transportation Plan (ATP)

In May 2023, the County adopted its ATP, which serves as a roadmap for implementing active transportation improvements within the public right-of-way in the unincorporated communities of Santa Barbara County. The ATP aims to promote safety, mobility, and access while reducing carbon emissions and supporting public health. While the ATP is a standalone plan rather than an amendment

to the County's Circulation Element and community plans, it reflects and builds upon data collection, input, projects, and policies put forth in previous plans, including the Eastern Goleta Valley, Orcutt, and Santa Ynez Valley Community Plans. Key goals in the ATP include the following:

Goal 1. Enhance the multi-modal transportation network for all unincorporated areas in Santa Barbara County, with an emphasis on increasing safety around schools and key destinations for people walking, biking, or rolling.

Goal 2. Hear directly from the community to understand local travel patterns and challenges, and how travel options can be improved for people of all ages and abilities.

Goal 3. Identify and prioritize active transportation investments, including infrastructure and programs, that improve access, equity, and mobility while reducing collisions and emissions.

Goal 4. Promote and encourage people to choose walking, bicycling, or rolling through the creation of a comfortable, connected, and accessible active transportation network that connects both rural and urban areas throughout the region and encourages alternatives to single occupancy vehicle trips.

Old Town Orcutt Traffic, Circulation, and Parking Study

This traffic study, which encompasses the Old Town Orcutt Pedestrian Area, outlines the existing traffic and circulation conditions within the study area, quantifies the existing parking supply and parking demand within Old Town Orcutt, evaluates future roadway and intersection operations, and discusses potential operational improvements.

Old Town Orcutt Streetscape Concept Plan

This concept plan focuses on transforming the setting of Clark Avenue from a high-speed automobile thruway to a pedestrian-oriented, aesthetically pleasing boulevard that reflects the historic character of the community. The plan focuses on maximizing on-street parking opportunities, streetscape beautification, improving the safety and comfort of pedestrians, and maintaining quality of life in the adjacent residential neighborhoods.

Fiscal Year 2021-2026 Capital Improvement Program (CIP)

The County's CIP is a multi-year planning tool to identify and implement short-term and long-term capital needs (County of Santa Barbara 2021). Capital projects in the CIP include repairs, rehabilitation, and replacement of critical facilities countywide. The plan also addresses improvements and non-routine maintenance to County-owned facilities, roads, bridges, and flood control facilities owned and managed by the Santa Barbara County Flood Control and Water Conservation District. The recommended Fiscal Year 2021-2026 CIP includes a total of $74.9 million in projects in fiscal year 2021-2022 for General Services, the County Fire Department, the Department of Public Works, and the Community Services Department (park improvements). Public Works projects include road improvements (e.g., pavement, hardscapes, bridge repair), general maintenance on bridges and low water crossings, traffic and circulation improvements, drainage systems, and flood controls. Specific projects included in the Orcutt and Goleta TIPs are implemented through the CIP, including roadway, intersection, transit, and sidewalk improvements.

County Code – Santa Barbara, California Chapter 23C Transportation Impact Mitigation Fee

County Code Chapter 23C is intended to ensure that new development or subdivisions pay their fair share of the costs for the impacts they have on certain capital improvements, including transportation and transit facilities. Fees are determined based on the proposed land use of the property to be developed or subdivided and the planning region the site is located. Fees for residential land uses are calculated per parcel, for final approval of a subdivision map, or by dwelling unit. These fees are levied on all new residential projects with the amount of the fee varying from community to community countywide. Discounted fees are provided for eligible affordable housing projects. The communities of Goleta and Orcutt have fee structures that reflect the cost of improvements needed within each community based on development anticipated under the Eastern Goleta Valley Community Plan and the Orcutt Community Plan. These fees were validated through detailed nexus studies prepared under AB 1600 and refined again with subsequent multimodal capital improvement plans. Transportation impact fees are determined by the projected cost of transportation system improvements identified in the Orcutt TIP or Goleta TIP. The County is currently undertaking a comprehensive update to Transportation Impact Mitigation Fees to reflect updated growth projections related to the proposed Project.

County Code – Santa Barbara, California Chapter 23A Transportation Demand Management (TDM) Program

The purpose of the County's TDM Ordinance is to reduce traffic congestion, air pollution, and parking demand and improve the quality of life by regulating the percentage of commuters in the region who drive alone to or from work during peak periods. This is accomplished by facilitating the adoption and implementation of employer sponsored TDM programs that encourage the use of commute alternatives and alternative work hours. Per the County's TDM Ordinance, each employer is required to conduct a commuter survey and obtain a completed commuter survey from each of its employees in the region that accurately represents employee travel and work characteristics. Within 90 days following the return of the tabulated baseline commuter surveys, each affected employer must develop and prepare a TDM plan to be implemented at all affected worksites. The TDM must state any practicable combination of employer programs sufficient to achieve and/or maintain the Employer Participation Rate (EPR) and employer AVO objectives, and any reasonable combination of information dissemination and marketing measures designed to promote the use by the employer's employees of commute alternatives and alternative work hours. Affected employers are required to achieve and thereafter maintain an employer participation rate of at least 65 percent by the completion of the employer's third annual commuter survey. If the regional AVO objective is not achieved by the completion of the fifth annual commuter survey, then affected employers must achieve a 10 percent increase over baseline AVO within 2 years and maintain the AVO thereafter.

3.14.4 Environmental Impact Analysis

This section discusses the potential transportation and circulation impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.14.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purpose of this Program Environmental Impact Report (EIR), implementation of the proposed Project may have a significant adverse impact on transportation and circulation if it would:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b); and/or
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Appendix G of the CEQA Guidelines also includes the following threshold of significance for impacts relating to emergency access.

d. Result in inadequate emergency access.

As discussed in Section 3.16, *Wildfire,* due to the relationship of this threshold of significance to countywide wildfire hazards, this impact is discussed in Section 3.16, *Wildfire,* and will not be addressed further in this section.

County Environmental Thresholds and Guidelines Manual – Transportation Impacts

In response to updates to the CEQA Guidelines and SB 743 to revise criteria for determining what constitutes a significant transportation-related environmental impact and shift from LOS-based metrics (i.e., vehicle delay) to VMT, the County approved an amendment to the County's *Environmental Thresholds and Guidelines Manual* in September 2020. This amendment describes how to interpret and apply the four transportation threshold questions contained in Appendix G of the CEQA Guidelines and the County's Initial Study Template.

Threshold "a" – Potential Conflict with a Program, Plan, Ordinance, or Policy

The Connected 2050 RTP/SCS and the County's Comprehensive Plan, zoning ordinances, capital improvement programs, and other planning documents contain transportation and circulation programs, plans, ordinances, and policies. Threshold question "a" considers a project relative to those programs, plans, ordinances, and policies that specifically address multimodal transportation, complete streets, TDM, and other VMT-related topics. The County and CEQA Guidelines Section 15064.3(a) no longer consider automobile delay or congestion an environmental impact. Therefore, threshold question "a" does not apply to provisions that address LOS or similar measures of vehicular capacity or traffic congestion. A transportation impact occurs if a project conflicts with the overall purpose of an applicable transportation and circulation program, plan, ordinance, or policy, including impacts to existing transit systems and bicycle and pedestrian networks pursuant to Public Resources Code Section 21099(b)(1). In such cases, applicants must identify project modifications or mitigation measures that eliminate or reduce inconsistencies with applicable programs, plans, ordinances, and policies. For example, some community plans include provisions that encourage complete streets and multi-modal improvements as part of new development. As a result, an applicant for a multifamily apartment complex may need to reduce excess parking spaces, fund a transit stop, and/or add bike storage facilities to comply with a community plan's goals and policies.

Threshold "b" – Potential Impact to VMT

Threshold question "b" establishes VMT as the metric to determine transportation impacts. The County's *Environmental Thresholds and Guidelines Manual* includes project-level impact screening thresholds and VMT thresholds of significance specific to land use projects and land use plans.

The County presumes that projects meeting any of the screening criteria, absent substantial evidence to the contrary, would have less than significant VMT impacts and would not require further analysis. Projects that do not meet any of the screening criteria require an analysis of VMT and the preparation of a VMT transportation study. Screening criteria for land use projects are:

- **Small Projects:** A project that generates 110 or fewer average daily trips;
- **Locally Serving Retail:** A project that has locally serving retail uses that are 50,000 square feet (sf) or less;
- **Projects Located in a VMT Efficient Area:** A residential or office project that is located in an area that is already 15 percent below the county VMT (i.e., "VMT efficient area"). The County's Project-Level VMT Calculator determines whether a proposed residential or office project is located within a VMT-efficient area.
- **Project Near Major Transit Stop:** A project that is located within 0.5 miles of a major transit stop or 0.5 miles of a bus stop on an HQTC. In addition, the project must have a floor area ratio (FAR) of 0.75 or greater, be consistent with the applicable SBCAG SCS (as determined by the County), provide more parking than required by the County's Comprehensive Plan and zoning ordinances; and not replace affordable housing units (units set aside for very low-income and low-income households) with a smaller number of moderate- or above moderate-income housing units.
- **Affordable Housing:** A residential project that provides 100 percent affordable housing units (units set aside for very low-income and low-income households); if part of a larger development, only those units that meet the definition of affordable housing satisfy the screening criteria.

The County generally uses thresholds of significance to determine the significance of transportation impacts for projects and plans that do not meet any of these screening criteria. The County expresses thresholds of significance relative to existing, or baseline, county VMT. Specifically, the County compares the existing, or baseline, county VMT (i.e., pre-construction) to a project's VMT. Projects with VMT below the applicable threshold would normally result in a less than significant VMT impact and, therefore, would not require further analyses or studies. Nonetheless, CEQA Guidelines Section 15064(b)(2) states, "[c]ompliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant." Projects with a VMT above the applicable threshold would normally result in a significant VMT impact and, therefore, would require further analyses and studies, and, if necessary, project modifications or mitigation measures. The VMT thresholds of significance are for general use and should apply to most projects subject to environmental review. However, the thresholds may not be appropriate for unique projects. In such cases, CEQA Guidelines Section 15064.7(c) allows the County to use other thresholds "…on a case-by-case basis as provided in Section 15064(b)(2)." When using thresholds on a case-by-case basis, the County requires substantial evidence to justify why different thresholds are appropriate.

The County's *Environmental Thresholds and Guidelines Manual* presents separate VMT thresholds for land use projects, land use plans, and transportation projects. The proposed Project is a land use plan that would enable up to 34,558 new residential units across the unincorporated areas of the county and does not meet the above screening criteria. As such, the most applicable VMT significance threshold for the proposed Project would be the land use plan threshold.

The County's VMT thresholds for land use plans focus on urban areas because most vehicle trips are generated by urban residential and commercial/industrial development and originate and have destinations within urban areas. The County's VMT thresholds compare the existing, or baseline, county VMT to a plan's VMT. For a land use plan, a VMT impact would occur if the plan's generated total VMT per service population exceeds a level of 15 percent below the existing total VMT per service population for the geographic area. Additionally, a plan's VMT impact would be cumulatively considerable if the plan results in a net increase in total VMT compared to existing conditions. As described in the County's *Environmental Thresholds and Guidelines Manual,* a land use plan could change travel patterns in the region and an efficiency-based threshold may not fully capture such changes. Therefore, the analysis of a land use plan's cumulative impacts should consider the net increase in Total VMT, which would provide a more detailed analysis of all travel in the plan area and region.

County VMT Thresholds for Land Use Plans

- **Project-Level VMT Threshold:** If the plan's generated Total VMT per Service Population exceeds a level of 15 percent below existing Total VMT per Service Population for the geographic area.
- **Cumulative VMT Threshold:** if the plan results in a net increase in total VMT compared to existing conditions.

Threshold "c" – Design Features and Hazards

Threshold "c" considers whether a project would increase roadway hazards. An increase could result from existing or proposed uses or geometric design features. In part, the analysis should review these and other relevant factors and identify results that conflict with the County's Engineering Design Standards or other applicable roadway standards. For example, the analysis may consider the following criteria:

- The project requires a driveway that would not meet site distance requirements, including vehicle queueing and visibility of pedestrians and bicyclists.
- The project adds a new traffic signal or results in a major revision to an existing intersection that would not meet the County's Engineering Design Standards.
- The project adds substantial traffic to a roadway with poor design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure).
- The project introduces a new use and substantial traffic that would create potential safety problems on an existing road network (e.g., rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use). If a project would result in potential roadway hazards, the applicant would need to modify the project or identify mitigation measures that would eliminate or reduce the potential hazards. For

example, an applicant for a retail shopping center may need to shift the location of a new driveway or add sidewalks or pedestrian crossings to reduce potential conflicts between customers and pedestrians.

Threshold "d" – Emergency Access

Threshold "d" considers any changes to emergency access resulting from a project. To identify potential impacts, the analysis must review any proposed roadway design changes and determine if they would potentially impede emergency access vehicles. A project that would result in inadequate emergency vehicle access would have a significant transportation impact and, as a result, would require project modifications or mitigation measures. For example, a project that modifies a street and, as a result, impairs fire truck access, would require modifications or redesign to comply with County and fire department road development standards.

Again, as discussed in Section 3.16, *Wildfire,* due to the relationship of this threshold of significance to wildfire hazards, this impact is discussed in Section 3.16, *Wildfire,* and will not be analyzed further in this section.

Methodology

This analysis is conducted based on the proposed Project assumptions described below and in the VMT Report prepared for the proposed Project (Appendix F). The scope of work for the VMT Report was determined in consultation with County Long Range Planning and Transportation Division staff to inform the transportation impact analysis, consistent with CEQA and the County's *Environmental Thresholds and Guidelines Manual*.

Programs, Plans, Ordinance, and Plan Consistency

The plan, ordinance, and policy consistency analysis assesses whether the Housing Element Update would conflict with an adopted plan, ordinance, and policy addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities as required under CEQA) that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multi-modal transportation options and a reduction in VMT. A project (including a land use plan such as the Housing Element Update) that does not implement a program, plan, policy, or ordinance would not necessarily result in a conflict or an impact. Many of these programs must be implemented by the County over time and a broad area, and this threshold test intends to ensure that proposed development projects and plans do not preclude the County from implementing adopted programs, plans, and policies.

This analysis of land use consistency considers whether the Housing Element Update would be consistent with applicable plans, policies, and regulations. Sources utilized in the development of this section include SBCAG's Connected 2050 RTP/SCS, the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan, the Regional ATP, the Santa Ynez Valley Bicycle Master Plan, the Circulation Element of the County's Comprehensive Plan, adopted community and area plans, and the County Code. Plan and policy consistency is based on whether the Housing Element Update would result in environmental impacts to transportation as outlined in the applicable plan.

VMT Methodology and Project Assumptions

The analysis of VMT for the proposed Project is based on the County's VMT thresholds of significance and analysis methodology outlined in the County's *Environmental Thresholds and Guidelines Manual* which are informed by the Transportation Analysis Updates in Santa Barbara County (2020) technical report and based on OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (2018). Guidance is provided for project-level analysis addressing several broad land use types that account for a majority of development projects in the county, as well as land use plans and programs. The potential Project VMT increases are addressed in the context of CEQA Guidelines Section 15064.3 and Appendix G of the CEQA Guidelines, as well as this technical guidance.

As explained in the County Guidelines, the County uses the SBCAG's RTDM to estimate VMT. The RTDM (TransCAD Version 9.0) is a four-step travel demand model that evaluates the following:

1) Trip generation (i.e., number of trips);
2) Trip distribution (i.e., where those trips go);
3) Mode choice (i.e., how the trips are divided among the available modes of travel); and
4) Trip assignment (i.e., route trips will take).

Each trip forecasted in the RTDM has a purpose, type, origin, and destination. The RTDM estimates and forecasts travel by traffic analysis zone (TAZ) for a 24-hour period on a typical weekday. Approximately 360 TAZs have significant portions within the unincorporated areas of the county. Each TAZ has socioeconomic data that represent the population and employment within the area. The latest version of the SBCAG RTDM was developed for the 2050 Connected RTP/SCS (SBCAG 2021) and was utilized for the project VMT analysis.

The SBCAG RTDM uses an origin-destination (OD) VMT methodology to estimate the VMT of land use plans. The OD VMT methodology estimates the VMT generated by land uses in a defined geographic area, such as the whole unincorporated county or a specific HMA. The SBCAG RTDM estimates OD VMT by tracking all vehicles traveling to and from a defined geographic area and calculating the number of trips and length of those trips to estimate VMT.

As previously described, the Santa Barbara County baseline VMT was calculated using the SBCAG RTDM. The RTDM calculated a total of 7.7 million daily VMT for unincorporated Santa Barbara County which results in an annual VMT of 2.8 billion. With a service population of 194,854, unincorporated Santa Barbara County has a 39.5 VMT per capita. In accordance with County guidelines, a significant VMT impact would occur if the Housing Element Update would generate a total VMT per service population above 33.6, which represents a level of 15 percent below the existing total VMT per service population in the unincorporated county.

The VMT Report for the proposed Project used the SBCAG RTDM to analyze two future scenarios VMT impact analysis: 1) Future No Project; and 2) Future with Housing Element Update. Both scenarios reflect the year 2031 and account for growth in Santa Barbara County as planned by the Connected 2050 RTP/SCS including the incorporated cities. Within the county, the Future No Project is based on growth considered under the Connected 2050 RTP/SCS as included in the RTDM. The Future with Housing Element Update is based on the development of all potential housing sites identified for the Housing Element Update, which were calculated using the housing site and unit

counts and the expected amount of commercial development in the county. (Refer to Section 3.0, *Introduction and Approach to Analysis* for more details regarding buildout assumptions.)

Design Features and Hazards

As described in Chapter 2, *Project Description*, the Housing Element Update would enable up to 34,558 new residential units across the unincorporated areas of the county. Future project-level siting and design details are not known. As a result, the impact analysis provided below does not evaluate individual potential geometric design features or incompatible use hazards at a project- or site-specific level. Rather, the analysis provided by this Program EIR programmatically addresses the potential for the Housing Element Update to result in temporary construction-related roadway hazards such as conflicts between vehicles, bicycles, and pedestrians. Additionally, this analysis programmatically evaluates whether there would be long-term operational hazards related to design features such as curved streets with inadequate sight distances, unsafe separation of vehicle, bicycle, and pedestrian traffic, or inadequate pedestrian facilities (e.g., incomplete sidewalks, lack of striped pedestrian crossings). This analysis considered existing roadway configurations based on a review of aerial imagery as well as existing and future AADT along existing roadways.

3.14.4.2 Project Impacts

Table 3.14-8 provides a summary of the proposed Project's impacts related to transportation. A detailed discussion of each impact follows.

Table 3.14-8. Summary of Transportation Impacts

Transportation Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact T-1. The proposed Project could result in potential conflicts with regional transportation plans, or County transportation plans, policies, or regulations.	Potentially significant	MM T-1 (Site-based TDM) MM T-3 (Funding and Mitigation Fee Programs Update)	Significant but mitigable impacts
Impact T-2. The proposed Project could result in potentially significant increases in total VMT per service population within the county.	Potentially significant	MM T-1 (Site-based TDM) MM T-3 (Funding and Mitigation Fee Programs)	Significant and unavoidable impacts
Impact T-3. The proposed Project could result in adverse changes to the transportation safety environment.	Potentially significant	MM T-2 (Construction Traffic and Access Management Plan) MM T-3 (Funding and Mitigation Fee Programs)	Significant but mitigable impacts

Table 3.14-8. Summary of Transportation Impacts (Continued)

Transportation Impacts	Impact Classification	Mitigation Measures	Residual Significance
Cumulative Impacts	Potentially significant	MM T-1 (Site-based TDM) MM T-2 (Construction Traffic and Access Management Plan) MM T-3 (Funding and Mitigation Fee Programs)	Significant and unavoidable impacts

Impact T-1. The proposed Project could result in potential conflicts with regional transportation plans, or County transportation plans, policies, or regulations.

The proposed Project plans for the development of new residential and mixed use projects in existing communities in the unincorporated area, which are served by existing transportation networks and services and governed and planned according to a wide range of transportation plans, policies, regulations, and programs. Specifically, SBCAG and the County have adopted programs, plans, ordinances, and policies that establish the planning framework to achieve a safe, accessible, and sustainable transportation system for all users with a current focus on active transportation modes to encourage car-free travel and a reduction of VMT countywide. The CEQA Guidelines state that a project (including a land use project such as the proposed Project) would have a potentially significant impact if the project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Analysis of the consistency of a project with state, regional, and local plans is required under CEQA. As described below, while the proposed Project would not impede the implementation of several plans and programs, the Housing Element Update would be potentially inconsistent with the overall purpose of some adopted plans and programs, would potentially conflict with specific improvements to the transportation system planned for under these plans, or would potentially conflict with specific policies addressing the circulation system.

Santa Barbara County Association of Governments (SBCAG) Regional Plans

Connected 2050 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

The Connected 2050 RTP/SCS established objectives that are oriented towards achieving the plan's five overarching goals of promoting and protecting: 1) Environment; 2) Mobility & System Reliability; 3) Equity; 4) Health and Safety; and 5) A Prosperous Economy. The objectives aim to foster growth and transportation improvements in a manner that protects natural resources, encourages mixed use development, focuses future growth within existing urbanized areas, reduces or limits new trip generation and VMT, provides equitable access to transit and alternative transportation, and reduces traffic congestion.

The Housing Element Update supports these goals by planning for and promoting residential and mixed use development to help address the overall housing needs as well as the unique housing needs

of specific communities or regions within the county. The various programs proposed as part of the Housing Element Update also demonstrate the consistency of the proposed Project with land use planning goals and policies set forth in the Connected 2050 RTP/SCS. For instance, the programs described in the discussion of *Housing Goals, Policies, and Programs* of Section 2.3.2, *Project Components,* would serve to facilitate or encourage the development of housing which would serve to help alleviate local housing needs and improve the balance of jobs and housing throughout the county. As proposed by the Housing Element Update, planning housing in existing urban areas and near job centers reduces VMT and commuting in the county and aligns land use with the sustainable communities priorities put forth in the Connection 2050 RTP/SCS and SB 375.

The Housing Element Update proposes a majority of housing development within urban areas of the South Coast to address the jobs-housing balance in the region. As described in the Connected 2050 RTP/SCS, the South Coast is jobs-rich and housing-poor, and this region's diverse mix of employment opportunities, coupled with an expensive housing market, drives workers to seek more affordable housing in areas such as the Lompoc Valley and Santa Maria Valley, as well as in adjacent counties. In the past 20 years, the number of workers commuting into the county has been steadily increasing, as has the number of workers making a longer commute within the county. These longer commutes increase VMT, energy use, air pollutant emissions, and GHG emissions and come with associated physical environmental impacts, the effects of which the Connected 2050 RTP/SCS aims to avoid or address through several of its policies and objectives. As presented in Chapter 3, *Environmental Impact Analysis,* approximately 52 percent of the overall development enabled under the Housing Element Update would be located within the South Coast. Under the proposed Project, the production of new affordable housing, especially for areas in the South Coast where jobs are highly concentrated, could potentially reduce the environmental impacts associated with long-distance commutes, especially relating to VMT, which would help to meet the goals of the Connected 2050 RTP/SCS. In addition, within the South Coast, a majority of the future housing development is proposed within the Eastern Goleta Valley near the Hollister Avenue Corridor, where the only HQTC in the county exists.[2] Based on the sites inventory developed for the Housing Element Update, 79 housing sites are located within the HQTC in Eastern Goleta Valley, including nine County-owned sites, eight pending projects, 14 potential rezone sites, and 48 existing vacant sites. Development in this area, as well as other areas of the county in proximity to transit services and pedestrian and bicycle facilities, would help to encourage alternatives to single-occupancy vehicle trips and the use of alternative modes of transportation to reduce VMT.

As described below in Impact T-2, based on the Housing Element Update's sites inventory, the proposed Project's distribution of residential and mixed use development would generally result in a VMT per capita that is lower than the existing baseline VMT per capita countywide. Again, this is especially true for potential housing development within the South Coast due to the proximity of potential housing sites to employment and services and active transportation modes, including the only HQTC in the county. However, despite a countywide reduction in VMT per capita under the proposed Project, the development of new residential and mixed use projects within the Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley would result in a VMT per capita that would exceed the County's adopted VMT per capita significance thresholds. While exceedance of the County's adopted numerical significance thresholds is not directly related to the potential consistency of the proposed Project with other plans and policies addressing transportation, these results indicate

[2] HQTCs are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

the overall consistency of the land use and planning patterns of the proposed Project with goals and objectives of the Connected 2050 RTP/SCS. In other words, the potential for the Housing Element Update to result in new residential development in the North County, which is relatively jobs-poor and public transit limited as compared to the South Coast, would result in VMT per capita impacts that could indicate a potential inconsistency with the Connected 2050 RTP/SCS and SB 375.

It is important to note that based on the sites inventory and potential maximum buildout assumptions, the proposed Project may result in new housing and population growth that would substantially exceed regional growth forecasts. (Refer to the discussion of Impact PH-1 in Section 3.12, *Population and Housing* for a detailed discussion of consistency with the projections of the Connected 2050 RTP/SCS.) The objectives and policies of the Connected 2050 RTP/SCS, particularly those relating to land use planning and congestion management, are largely based upon the regional growth forecast, which was published in 2019 and does not factor in more recent housing, population, and employment trends, including the newest 6th Cycle RHNA for Santa Barbara County. The 2023-2031 RHNA, on the other hand, was developed with future housing growth in mind and has reformed the way that housing needs are addressed in the County's Land Use Element and zoning ordinance. The regional growth forecast does not reflect the development potential associated with the proposed Project, including growth in the North County. Taken together, although the proposed Project is reasonably inconsistent with growth projections in the Connected 2050 RTP/SCS, the goal of the proposed Project and its suite of programs as a whole is to meet the housing needs of the county, including the North County and the South Coast. Nevertheless, given the goals and policies of the Connected 2050 RTP/SCS are based on the regional growth forecast, the proposed Project's potential to result in growth that exceeds the regional growth forecast may indicate a potential inconsistency with the RTP/SCS. Therefore, the proposed Project would potentially be inconsistent with the goals and policies of the Connected 2050 RTP/SCS, and Project impacts are considered *potentially significant.*

Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan

The Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan was prepared pursuant to CTC's adopted guidelines for projects funded through SB 1's Solutions for Congested Corridors Program. As previously discussed in Section 3.14.3.3, *Regional Regulations,* the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan (2022 Update) directly aligns with the Connected 2050 RTP/SCS, and all projects of the plan are included in the RTP/SCS as fiscally constrained projects. Therefore, and project's consistency with the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan can be directly determined based on a project's consistency with the Connected 2050 RTP/SCS.

As described above, the proposed Project would be potentially inconsistent with the goals and policies of the Connected 2050 RTP/SCS due to growth projections that far exceed the regional growth forecast, which were directly utilized to develop the assumptions for future land use patterns within the county and inform the goals and objectives of the RTP/SCS, as well as plans and projects of the U.S. Highway 101 widening project. Therefore, the proposed Project would be potentially inconsistent with the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan. The purpose and design of the proposed U.S. Highway 101 widening project, as outlined in the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan, is to alleviate existing and future congestion along the U.S. Highway 101 corridor on the South Coast caused by regional growth. By proposing a land use pattern that would be inconsistent with the growth assumptions of the Connected 2050 RTP/SCS, the proposed Project would be potentially inconsistent with the Santa Barbara U.S. Highway

101 Comprehensive Multimodal Corridor Plan. Specifically, the housing and population growth within the South Coast resulting from the proposed Project may generate increases in traffic and congestion that have not been planned for as part of the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan. However, the potential benefits associated with improving the jobs-to-housing balance on the South Coast should be noted, as improving this balance could help to reduce commuter trips which contribute to congestion along U.S. Highway 101 by providing affordable housing close to job centers. Nevertheless, the proposed Project is considered to result in potential inconsistencies with the planned improvements under the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan, and impacts would be *potentially significant.*

Regional Active Transportation Plan

The SBCAG Regional ATP aims to promote active transportation and improve corridor connectivity (i.e., walking and bicycling) to reduce regional VMT, vehicle congestion, and vehicle emissions. While the proposed Project consists of a land use planning program and does not include any features or specific projects that would directly affect the performance or safety of transit, bicycle, or pedestrian facilities, the proposed Project would enable new residential and mixed use development that may result in a subsequent demand for such facilities, particularly in regions of the county where such services are already lacking. However, the Housing Element Update would not restrict SBCAG's ability to implement any planned transportation improvements under the Regional ATP.

Given the programmatic nature of the proposed Project and total area of eligibility, these trips, and associated demand for transit, bicycle, or pedestrian facilities, would be distributed throughout the county. However, it is foreseeable that many of these trips would be concentrated within urban areas of the South Coast and Santa Maria Valley, where such services and facilities may be more present and well-maintained, and reliance on such facilities may be more common. It is anticipated that several trips generated by future housing development will be made by workers and residents who currently use these facilities. Facilitating affordable housing in proximity to existing services and facilities would be consistent with Goal No. 1 of the Regional ATP, which aims to promote increased bicycling and walking to reduce vehicle trips, VMT, vehicle congestion, and vehicle emissions regionwide. Further, as discussed below, future development would be subject to compliance with existing County zoning regulations and development standards, which include standards for the provision of pedestrian and bicycle facilities. Therefore, the proposed Project would not result in potential inconsistencies with the goals and policies of the Regional ATP, and impacts would be *insignificant.*

Santa Ynez Valley Bicycle Master Plan

The Santa Ynez Valley Bicycle Master Plan identifies community priorities to guide and coordinate the implementation of improvements to the bicycle network within the Santa Ynez Valley to improve connectivity, safety, and equitable access. Under the Santa Ynez Valley Bicycle Master Plan, the member agencies have planned for several improvements to the region's bicycle network to achieve these goals. Some of the highest priority projects identified in the Santa Ynez Valley Bicycle Master Plan include the Santa Ynez River Trail and the Los Olivos to Los Alamos Multimodal Trail. The Housing Element Update would not restrict the member agencies' ability to implement any planned transportation improvements under the Santa Ynez Valley Bicycle Master Plan. The Housing Element Update would promote the goals and objectives of the Santa Ynez Valley Bicycle Master Plan by placing housing in proximity to existing and planned bicycle facilities. Further, as discussed below, future development would be subject to compliance with existing County zoning regulations and development standards, which include standards for the provision of pedestrian and bicycle facilities.

Therefore, the Housing Element Update would not conflict with transportation improvements under the Santa Ynez Valley Bicycle Master Plan, and impacts would be *insignificant.*

Santa Barbara County Comprehensive Plan

Circulation Element

The Circulation Element of the Comprehensive Plan identifies key roadway links throughout the unincorporated areas of the County and, along with the other elements of the Comprehensive Plan, guides decisions regarding new development. The objective of this Element is to provide clear traffic capacity guidelines that are intended to maintain acceptable levels of service on the County's roadways and intersections while allowing reasonable growth within the communities of the unincorporated area, including the community planning areas. This Element provides specific policies related to traffic and transportation implications of development projects and establishes guidelines to determine the project-related traffic impacts on County roadways; these goals and policies are also reflected in the County's ATP. Specifically, development projects would be inconsistent with the Circulation Element if roads and transportation services, including pedestrians, bicycles, and other active transportation modes, are inadequate to serve the proposed development before issuance of a development permit. The Circulation Element's policies require development applicants to assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the project and allow the County to deny a project or reduce the density of a land use plan if the project would not be adequately served by existing roadways and intersection infrastructure.

As estimated in the VMT Report (Appendix F), total average daily trips (ADT) countywide would increase by nearly 325,000 trips, a 41 percent increase from existing conditions. Based on the sites inventory prepared for the Housing Element Update, these new ADTs would not be evenly distributed; rather, clusters of development would occur within existing communities and would concentrate on existing roadways serving those communities. The increased traffic on these affected roadways could be substantial and exceed the County's policy and/or design capacities for existing roadways and intersections adopted in the Circulation Element, which would be inconsistent with the policies of the Circulation Element. For example, in Eastern Goleta Valley, Patterson Avenue from Hollister Avenue to U.S. Highway 101 could experience an increase of over 32,000 ADT from the maximum development of the potential rezone sites within the South Patterson Agricultural Area (Appendix F). This estimated growth would increase ADT on this roadway by 130 percent. This substantial increase could exceed the design capacity of the roadway and intersections serving the neighborhood and lead to traffic safety issues, as further analyzed in Impact T-3 below. Additionally, the new residential population would increase demand for multi-modal improvements to support active transportation modes, such as biking, walking, and transit, as further analyzed below under *Community Plans*.

To address future residential and mixed use development project consistency with the Circulation Element, the County's existing planning process requires applicants to improve roadways and intersections directly serving the project. These improvements commonly take the form of sidewalk and bicycle lane improvements, additional travel and turning lanes, intersection signalization and timing changes, pedestrian crossing, street lighting, and signage. Combined with the payment of Transportation Impact Mitigation Fees under County Code Chapter 23C, which contribute fair-share funding to offsite transportation improvements needed to serve regional growth, the County can ensure that individual residential and mixed use development projects occurring as implementation of the Housing Element Update are each consistent with the Circulation Element's policies to be

adequately served by multi-modal transportation facilities on a site-by-site basis. Please also see Impact T-3 for a more detailed analysis of transportation geometric/design and safety issues.

The proposed Project would also help fulfill the goals and policies of the County's Circulation Element, which encourages community and area plans adopted subsequent to this Element to achieve a balance between designated land uses and roadway and intersection capacity and encourage the use of alternative modes of transportation. The proposed Project would bring new residential development to communities currently served by active transportation infrastructure, including sidewalks, bike lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. This is especially true for residential and mixed use development projects located within the South Coast (i.e., Eastern Goleta Valley) (Impact T-2). As such, the proposed Project would promote more sustainable land use patterns countywide and create opportunities for alternative transportation consistent with the Circulation Element's goals and policies.

However, the County's CIP, TIPs, and Transportation Impact Mitigation Fees do not currently factor in more recent housing, population, and employment trends, including the newest 6th Cycle RHNA for Santa Barbara County. Based on the sites inventory prepared for the Housing Element Update and potential maximum buildout assumptions, the proposed Project may result in new housing and population growth that would substantially exceed regional growth forecasts, including in communities such as Goleta and Orcutt where the TIPs do not account for the substantial growth associated with the implementation of the Housing Element Update. Therefore, while site-specific transportation improvements would be funded by applicants, it is not certain that offsite or regional transportation infrastructure would be sufficient to meet the needs of all new developments accommodated under the proposed Project. Therefore, the proposed Project would potentially be inconsistent with the goals and policies of the Circulation Element, as well as the intent of the County's TIPs and Transportation Impact Mitigation Fee Program (County Code Chapter 23C), and impacts would be *potentially significant.*

Community Plans

The County's 10 community plans provide goals, policies, and roadway classifications specifically for each applicable unincorporated community; these goals and policies are also reflected in the County's ATP. The community plans prioritize multi-modal transportation and the development of active transportation facilities, including sidewalks, trails, bike lanes, and transit facilities while ensuring the circulation system maintains the quality of life for residential neighborhoods. While the proposed Project does not include improvements to the circulation system in the community plan areas, the Housing Element Update proposes a land use pattern for residential and mixed use development countywide that supports sustainable community planning. The proposed Project would bring new residential development to communities currently served by active transportation infrastructure, including sidewalks, bike lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. This is especially true for residential and mixed use development projects located within the South Coast (i.e., Eastern Goleta Valley) (Impact T-2). Further, in Eastern Goleta Valley, Hollister Avenue, Calle Real, and Turnpike Road are defined as Eastern Goleta Valley Corridors and prioritized for multi-modal improvements in County transportation project planning. Most of the potential South Coast housing sites are located along these corridors and would be well-served by ongoing multi-modal improvements to these roadways. As such, the proposed Project would promote more

sustainable land use patterns countywide and create opportunities for alternative transportation consistent with applicable community plan goals and policies.

Similar to the Circulation Element, the County's existing planning process requires applicants to improve roadways and intersections directly serving the project consistent with the classifications and policies of the applicable community plan. These improvements commonly take the form of sidewalk and bicycle lane improvements, additional travel and turning lanes, intersection signalization and timing changes, pedestrian crossing, street lighting, and signage. Combined with the payment of Transportation Impact Mitigation Fees under County Code Chapter 23C, which contribute fair-share funding to offsite transportation improvements needed to serve regional growth, the County can ensure that individual residential and mixed use development projects occurring as implementation of the Housing Element Update are each consistent with the community plan's policies to be adequately served by multi-modal transportation facilities on a site-by-site basis. However, the Goleta and Orcutt TIPs and related Transportation Impact Mitigation Fees, as well as the Old Town Orcutt Streetscape and Traffic, Circulation, and Parking plans, do not currently factor in more recent housing, population, and employment trends, including the newest 6th Cycle RHNA for Santa Barbara County. Based on the sites inventory and potential maximum buildout assumptions, the proposed Project may result in new housing and population growth in community plan areas that would substantially exceed regional growth forecasts, including in communities like Goleta and Orcutt where the TIPs do not account for the substantial growth associated with the Housing Element Update. For example, based on the sites inventory prepared for the Housing Element Update, Old Town Orcutt could experience an additional 27,000 ADT from new housing at the eastern end of Clark Avenue from Rezone Site Nos. 22 (Key Site 11), 23 (Key Site 16), and 31 (Element Church). This increased traffic could require community-based improvements to roadways, intersections, and multi-modal facilities to be consistent with the Orcutt Community Plan. Because the growth associated with the Housing Element Update is not planned for in the community plans affected by the proposed Project, the proposed Project would potentially be inconsistent with the goals and policies of the community plans, as well as the intent of the County's Goleta and Orcutt TIPs and Transportation Impact Mitigation Fee Program (County Code Chapter 23C), and impacts are considered *potentially significant.* Impact T-3 provides a more detailed analysis of transportation geometric/design and safety issues.

Summary of Transportation Plan Consistency Analysis

Applicable transportation plans, policies, and programs in the unincorporated county comprise goals for sustainable community land use patterns and multi-modal/active transportation modes, consistent with SB 375 and SB 743. Relative to these policies, the proposed Project is generally consistent. As further analyzed in Impact T-2, the Housing Element Update proposes a land use pattern for residential and mixed use development countywide that supports sustainable community planning. The proposed Project would bring new residential development to communities currently served by active transportation infrastructure, including sidewalks, bicycle lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. This is particularly true in South Coast where housing would be located near job centers and served by existing multi-modal facilities.

However, the proposed Project would be potentially inconsistent with plans, policies, and programs to ensure adequate transportation facilities to serve all potential housing sites, particularly when potential housing sites are clustered together and rely on the same roadways, bike lanes, intersections, and sidewalks. The County's TIPs and Transportation Impact Mitigation Fee Programs

(County Code Section 23C) do not currently account for the population growth identified in the Housing Element Update. Further, it is uncertain whether project-funded onsite or offsite improvements would sufficiently serve the development site, particularly in combination with other adjacent potential housing sites that rely on the same transportation infrastructure. To ensure consistency with SBCAG and County transportation and circulation policies and programs and mitigate the potential impacts, **MM T-1 (Site-based TDM)** would ensure objective site-specific transportation demand management and multi-modal infrastructure to support the transportation needs of the residential or mixed use projects fostered by the Housing Element Update. **MM T-3 (Funding and Mitigation Fee Programs Update)** would further ensure regional transportation demand management and multi-modal infrastructure planning are conducted and funded by the County in combination with other agencies to provide a transportation system that sufficiently serves the projected growth and development under the Housing Element Update. With these mitigation measures, the impacts related to transportation plan consistency would be *significant but mitigable*.

Impact T-2. The proposed Project could result in potentially significant increases in total VMT per service population within the county.

The Housing Element Update constitutes a land use plan that would enable the development of up to 34,558 new residential units and 1.54 million sf of additional commercial uses in existing urban unincorporated communities. This potential future development would increase total average daily vehicle trips by 41 percent countywide, but this development and commensurate increase in ADT would not occur uniformly across all regions. Rather, most of this development is planned for the South Coast (52 percent), which is a VMT-efficient region of the county as a major jobs center that is served by multi-modal transportation services and the only HQTC in the unincorporated county. Similarly, a substantial portion of the planned growth (37 percent) would be located in the Santa Maria Valley (i.e., Orcutt), which is also a VMT-efficient region due to the relatively large number jobs and transportation services. A minor portion of the projected Project growth (11 percent) would be located in areas that are not VMT-efficient and are not served by HQTCs, including Lompoc Valley, Santa Ynez Valley, and Cuyama Valley. The VMT Report prepared for the proposed Project includes a VMT analysis to determine whether implementation of the Housing Element Update would result in a significant increase in VMT that would exceed the County's threshold of significance of 33.6 total VMT per service population (Appendix F). Based on the VMT Report for the Housing Element UPdate, the proposed Project would result in an exceedance of the County's VMT impact threshold for land use plans in the four HMAs located in North County.

Table 3.14-9 shows the VMT of the unincorporated county for future scenarios: 1) Future No Project; and 2) Future with Housing Element Update. Both scenarios reflect the year 2031 and account for growth in Santa Barbara County as planned by the Connected 2050 RTP/SCS including the incorporated cities. The Future with Housing Element Update is based on the development of all potential housing sites identified for the Housing Element Update, which were calculated using the potential housing site and unit counts and the expected amount of commercial development in the county. (Refer to Section 3.0, *Introduction and Approach to Analysis* for more details regarding buildout assumptions.)

Table 3.14-9. Future No Project and With Housing Element Update (2031) Vehicle Miles Traveled per Service Population

Region	VMT Metrics	Future No Project (2031)	Future With Housing Element Update (2031)	Percent Change from Future No Project
Countywide Unincorporated Areas	Daily Vehicle Trips	843,970	1,118,595	33%
	Average Trip Length	10.1	9.9	-1%
	Total VMT	8,521,343	11,127,670	31%
	Total VMT per Service Population	41.5	37.9	-9%
South Coast	Daily Vehicle Trips	434,466	537,407	24%
	Average Trip Length	9.2	8.7	-6%
	Total VMT	3,993,172	4,668,827	17%
	Total VMT per Service Population	37.7	31.3	-17%
Lompoc Valley	Daily Vehicle Trips	118,004	129,078	9%
	Average Trip Length	12.2	11.9	-3%
	Total VMT	1,442,974	1,532,616	6%
	Total VMT per Service Population	55.9	54.2	-3%
Santa Ynez Valley	Daily Vehicle Trips	81,273	94,013	16%
	Average Trip Length	12.6	12.5	-1%
	Total VMT	1,027,355	1,176,377	15%
	Total VMT per Service Population	49.6	50.8	2%
Santa Maria Valley	Daily Vehicle Trips	201,645	321,697	60%
	Average Trip Length	9.2	9.6	5%
	Total VMT	1,862,820	3,099,601	66%
	Total VMT per Service Population	36.4	36.6	1%
Cuyama Valley	Daily Vehicle Trips	8,582	36,400	324%
	Average Trip Length	22.7	17.9	-21%
	Total VMT	195,022	650,248	233%
	Total VMT per Service Population	138.6	82.8	-40%

Source: Fehr & Peers 2023; Appendix F.

As described in Impact T-1, the County has considered the requirements of SB 743 and SB 375 during the development of the sites inventory, including the identification of potential County-owned sites and potential rezone sites associated with the Housing Element Update. For example, there are 79 potential housing sites (including 14 potential rezone sites) that are located within an HQTC in the South Coast and 48 potential housing sites (including nine potential rezone sites) that are located within a 0.5-mile radius of a major transit stop. If considered individually, residential development at these sites could be screened out of VMT analysis. In accordance with the County's *Environmental Thresholds and Guidelines Manual*, the development of single-family residences on vacant land would

qualify as small projects that generate less than 110 or fewer average daily trips and would be screened out of VMT analysis. Similarly, 100-percent affordable development would also be screened out. This analysis of sites relative to the County's VMT screening criteria indicates housing enabled under the Housing Element Update is focused in VMT efficient locations, particularly within the South Coast. Nevertheless, the Housing Element Update constitutes a land use plan that would enable the development of up to 34,558 new residential units across the unincorporated areas of the county increasing total average daily vehicle trips by 41 percent, including in areas that are not VMT efficient and are not served by HQTCs (i.e., the North County). Therefore, the Housing Element Update would not be screened out of VMT analysis, and the land use plan significance thresholds would be applicable to evaluate project-level and cumulative impacts.

Under the Future VMT (i.e., 2031) with Housing Element Update, the Housing Element Update would increase total VMT by 31 percent increase but would reduce VMT per service population countywide by 9 percent. Nevertheless, the result of 37.9 VMT per service population countywide would exceed the County's VMT threshold, creating a *potentially significant* impact. To further investigate potential VMT impacts, the VMT Report also calculated the total VMT per service population in each of the five HMAs (Table 3.14-9).

Three of the five HMAs are forecasted to have a decrease in total VMT per service population in comparison to the Future No Project scenario: South Coast, Lompoc Valley, and Cuyama Valley. Santa Ynez Valley and Santa Maria Valley are forecasted to have a small (2 percent or less) increase in total VMT per service population in comparison to the Future No Project scenario. The VMT impact in each HMA is as follows:

- **South Coast** – Daily VMT is 675,655 higher in 2031 under the Future with Housing Element Update scenario compared to the Future No Project scenario. This represents a 17 percent increase in VMT compared to the Future No Project scenario, but after factoring in population growth, represents a 17 percent reduction in total VMT per service population. The total VMT per service population in the South Coast HMA is 31.3 with the Housing Element Update, which is below the County's VMT threshold.
- **Lompoc Valley** – Daily VMT is 89,642 higher in 2031 under the Future with Housing Element Update scenario compared to the Future No Project scenario. This represents a 6-percent increase in VMT compared to the No Future Project scenario, but after factoring in population growth, represents a 3-percent reduction in total VMT per service population. Although the total VMT per service population is lower under the Future with Housing Element Update scenario, the total VMT per service population in the Lompoc Valley is 54.2, which exceeds the County's VMT impact threshold and results in a *potentially significant impact*.
- **Santa Ynez Valley** – Daily VMT is 149,022 higher in 2031 under the Future with Housing Element Update scenario compared to the Future No Project scenario. This represents a 15-percent increase in VMT compared to the Future No Project scenario, but after factoring in population growth, represents a 2-percent increase in total VMT per service population. The total VMT per service population in the Santa Ynez Valley is 50.8 with the Housing Element Update, which exceeds the County's VMT impact threshold and results in a *potentially significant* impact.
- **Santa Maria Valley** – Daily VMT is 1,236,781 higher in 2031 under the Future with Housing Element Update scenario compared to the Future No Project scenario. This represents a 66-percent increase in VMT compared to the Future No Project. However, after factoring in population growth, this represents a 1-percent increase in total VMT per service population. The

total VMT per service population in the Santa Maria Valley is 36.6, which exceeds the County's VMT impact threshold and results in a *potentially significant* impact.

- **Cuyama Valley** – Daily VMT is 455,226 higher in 2031 under the Future with Housing Element Update scenario compared to the Future No Project scenario. This represents a 233-percent increase in VMT compared to the Future No Project scenario, but after factoring in population growth, represents a 40-percent reduction in total VMT per service population. Although the total VMT per service population is lower under the Future with Housing Element Update, the total VMT per service population in the Cuyama Valley is 82.8, which exceeds the County's VMT impact threshold and results in a *potentially significant* impact.

Table 3.14-10. Project VMT Impact Summary (Total VMT per Service Population)

Region	Total VMT per Service Population	County Project-Level VMT Threshold	Significant Project-Level VMT Impact?
Unincorporated Areas Countywide	37.9	33.6	Yes
South Coast	31.3	33.6	No
Lompoc Valley	54.2	33.6	Yes
Santa Ynez Valley	50.8	33.6	Yes
Santa Maria Valley	36.6	33.6	Yes
Cuyama Valley	82.8	33.6	Yes

Note:
Given the countywide baseline total VMT per service population of 39.5, the County's threshold (i.e., 15-percent reduction) for total VMT per service is 33.6. A total VMT per service population greater than 33.6 will result in a VMT impact.
Source: Fehr & Peers 2023; Appendix F.

Under the proposed Project, the total VMT per service population would exceed the County's VMT impact threshold in the four HMAs in the North County, including Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley. The job-housing imbalance and the comparative lack of resident-serving commercial land uses are more prevalent in the North County as compared to the South Coast, especially in Lompoc Valley, Santa Ynez Valley, and Cuyama Valley. The lack of resident-serving commercial land uses in these regions creates more trips and longer trip lengths, resulting in additional VMT generation. Additionally, unlike the South Coast region, public transit opportunities are also limited by few transit stops and lines and long wait times. While Santa Maria Valley transit services are more frequent and accessible than other HMAs in the North County, they still do not meet the same robust and frequent connections as found on the South Coast. Further, as previously described, the South Coast region is the only planning area in the county that has an HQTC. Housing developments within or near the HQTC or within proximity to a transit stop would encourage active and alternative transportation and reduce VMT. As previously described, 14 potential rezone sites are located within an HQTC, and nine potential rezone sites are located within a 0.5-mile radius of a major transit stop, all located on the South Coast. In the North County, however, no sites are located near a major transit stop or an HQTC and there are very few identified sites that occur along public transit routes. Limited examples include a cluster of sites – including Rezone Site Nos. 21 (Key Site 10), 22 (Key Site 11), and 23 (Key Site 16), as well as a few other sites along Clark Avenue. Further, bicycle lanes and pedestrian infrastructure are often limited or incomplete in northern unincorporated communities.

While additional mitigation measures are identified below, the housing policies and geographic distribution of sites in the Housing Element Update already support VMT reduction. A significant share of potential housing sites identified in the Housing Element Update is in the South Coast, which has the lowest total VMT per service population and shortest average trip lengths of the five HMAs. The proposed Project also includes housing near transit (e.g., on the Hollister Avenue HQTC in Eastern Goleta Valley) and identifies several mixed use sites. Mixed use developments enable fewer and shorter trips by creating greater density and a greater mix of uses. Affordable housing can also reduce VMT by reducing commute travel distances for more residents. These features of the proposed Project are VMT reduction strategies identified by the California Air Pollution Control Officers Association (CAPCOA) in their Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021) and estimated to reduce the total VMT of the proposed Project up to 31 percent; however, even with these features, the total VMT per service population would exceed thresholds of significance in the Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley, and would therefore, create a *potentially significant* VMT impact.

Mitigation to reduce Project VMT with active transportation improvements to ensure access to non-vehicular modes of travel would substantially reduce the significance of this impact and would better align the proposed Project with statewide and County goals for VMT and GHG reduction. Based on the VMT Report, TDM measures required by **MM T-1** would further reduce VMT by up to 10 to 12 percent. Under **MM T-1**, site-specific mitigation requirements that ensure each housing project enabled under the Housing Element Update provides facilities and programs to support residents' use of transit and active transportation modes can help mitigate the VMT contribution of the individual housing projects. Requirements would include filling in gaps in the sidewalk network, expanding bike infrastructure, subsidizing transit fares if transit service nearby is available, and providing bike parking. These site-specific trip reduction measures would be most effective in VMT-efficient areas, such as the South Coast and less so in areas such as Cuyama Valley where multi-modal transportation infrastructure is limited. The County's ATP identifies improvements throughout the county, which housing projects constructed adjacent to planned facilities can support by implementing the planned improvements. Additionally, **MM T-3 (Funding and Mitigation Fee Programs Update)** would require the County to review and update the County's CIP, TIPs, and the Transportation Impact Mitigation Fees in the context of the projected growth under the Housing Element Update to fully fund and implement required improvements, which could include sidewalks, bike paths, crossings, intersection improvements, and other roadway network improvements to encourage active transportation. However, it cannot be assured that these measures would be fully effective in reducing total VMT to below the County's adopted VMT impact thresholds for land use plans. Therefore, based on the County's established VMT threshold, which stipulates that a plan that generates total VMT per service population that exceeds a level of 15 percent below the existing total VMT per service population for the geographic area would be significant, the projected increase in Project VMT would be *significant and unavoidable*.

Impact T-3. The proposed Project could result in adverse changes to the transportation safety environment.

Construction-Related Impacts

Temporary impacts to the traffic safety environment can occur during construction when heavy haul trucks, cement trucks, materials and equipment delivery trucks, construction worker vehicles, and

other construction-related vehicles travel along freeways and the local transportation network. The development of a single-family home on vacant land would generate a negligible increase in construction-relate vehicle trips; however, depending on the amount of excavation and grading as well as the size of the proposed development, construction-related activities associated with a large development can involve tens of thousands of trips over 2 to 3 years. These construction-related trips can cause disruptions in traffic flows, reduced lane capacity, slowing in traffic movement, or otherwise interfere with traffic, transit, bicycle, and pedestrian circulation. Many of the sites included in the sites inventory, particularly in North County, are located in rural areas of the county and accessed from rural two-lane, non-signalized roads that experience low volumes of traffic. In these areas construction-related impacts to traffic safety generally involved slow traffic and reduced visibility. In certain circumstances these conditions can lead to collisions from passenger vehicles attempting to pass construction vehicles, from vehicles turning onto narrow two-lane roads with reduced visibility, and in some limited circumstances bicyclist-vehicle and pedestrian-vehicle safety conflicts. In more urban areas, such as the South Coast or the unincorporated community of Orcutt in the Santa Maria Valley, construction activities can require the temporary or extended closure of adjacent traffic lanes, bicycle lanes, and/or sidewalks on surrounding streets to accommodate the operation of construction equipment, demolition, grading, excavation for utilities, and other activities. Additionally, construction activities in more urban areas often involve idling, parking, and/or queueing of construction vehicles within the public right-of-way which could potentially obstruct visibility and result in vehicle, bicycle, and pedestrian safety issues. As a result, temporary construction-related impacts in rural and more urban areas could result in *potentially significant* impacts.

To avoid construction-related safety hazards, individual implementation of **MM T-2 (Construction Traffic and Access Management Plan)** would require the preparation of individual Construction Traffic and Access Management Plans for residential and mixed use development involving encroachment into the public right of way. These plans would be prepared by the individual project owners/applicants or their representatives and would be approved by the County Planning and Development Department (P&D) to address construction traffic routing (e.g., detours and/or lane closures) and traffic control (e.g., with signage and construction flaggers), as well as vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plans would also be required to identify designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic safety impacts during construction. Thus, the Construction Traffic and Access Management Plans would address temporary traffic impacts that could occur during each construction of residential and mixed use development enabled under the Housing Element Update. With the implementation of **MM T-2**, construction-related hazards would be *significant but mitigable*.

Operational Geometric Hazards

The proposed Project does not include or facilitate any improvements to the local transportation network within the county; instead, the Housing Element Update would plan for new residential and mixed use development, which would generally occur on existing vacant parcels and/or sites that are not currently zoned for residential development. While the details for future residential development projects (e.g., site plans, driveway locations, landscaping, utilities) are unknown, all individual housing projects would be subject to the County's review process and would be subject to compliance with adopted standards and regulations. This includes compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details, which address adequate driveway line of sight, turning movements, and other

geometric design considerations. Compliance with these adopted standards and regulations would ensure that impacts would be *insignificant*.

Operational Traffic Safety and Roadway Compatibility Impacts

The VMT Report prepared for the proposed Project estimated that total daily ADT would increase by as many as 325,000 trips countywide as a result of the Housing Element Update, a 41 percent increase from existing conditions (Fehr & Peers 2023; Appendix F). Based on the sites inventory prepared for the Housing Element Update, these new ADTs would not be evenly distributed; rather, clusters of development would occur within existing communities and would concentrate on existing roadways serving those communities. The increased traffic on these affected roadways could be substantial and exceed the County's design capacities for existing roadways and intersections, particularly in the South Coast (Eastern Goleta Valley) and Santa Maria Valley (Orcutt).

Table 3.14-11. Impacts on Roadway Capacity under the Proposed Project

Roadways	Baseline ADT	Policy Design Capacity ADT	Total Future ADT With Project
Eastern Goleta Valley			
U.S Highway 101 at Junction SR 154	109,000	100,000	116,992
U.S. Highway 101 at Turnpike Road	107,000	67,000	127,808
U.S. Highway 101 at Junction SR 217 South	80,000	100,000	112,219
U.S. Highway 101 at Storke Road	35,000	67,000	46,673
Patterson – Hollister to U.S. Highway 101	24,800	20,000	57,109
Hollister – Walnut to San Marcos Road	14,600	30,000	34,267
San Marcos Road – Hollister to San Simeon	1,700	5,000	16,861
Turnpike – Hollister to U.S. Highway 101	22,800	30,000	37,961
Cathedral Oaks at SR 154	9,800	16,000	17,792
Orcutt			
U.S. Highway 101 at Clark Avenue Santa Maria	28,000	44,000	39,604
SR 135 at East Clark Avenue	16,800	30,000	44,463
Clark Avenue – Bradley to Stillwell	16,100	30,000	27,704

Note:
Refer to Section 3.11, *Noise,* and Appendix E for additional information regarding roadway capacity and future ADT.
Sources: County of Santa Barbara 2015, 2020.

In Eastern Goleta Valley, Patterson Avenue from Hollister Avenue to U.S. Highway 101 could experience an increase of over 32,000 ADT from the maximum development of the potential rezone sites within the South Patterson Agricultural Area (Section 3.11, *Noise* and Appendix E). This estimated growth would increase ADT on this roadway by 130 percent. For another example, based on the sites inventory prepared for the Housing Element Update, Old Town Orcutt could experience an additional 27,000 ADT from new housing at the eastern end of Clark Avenue from Rezone Site Nos. 22 (Key Site 10), 23 (Key Site 16), and 31 (Element Church) combined. Substantial increases could exceed the design capacity of the roadway and intersections serving the neighborhood and lead to traffic safety issues.

Given the programmatic nature of the proposed Project and uncertainty regarding the size and location of where activities might occur, potential effects on site or roadway-specific accident rates

cannot feasibly be determined. However, with more vehicles traveling at irregular speeds and shorter following distances, the chances of collisions can increase substantially. Similarly, more vehicle congestion can lead to encroachment into stripped bicycle lanes and adjacent pedestrian facilities, as well as creating challenges for pedestrian crossings and safe routes to school. Additionally, some roadways within the county, particularly in the more rural areas like Cuyama Valley, Ballard, or Los Alamos may only be lightly maintained, subject to erosion or washout from storms, may have limited line-of-sight, have substandard road width or geometrics for turning movements, be of a poor condition, or potentially have on-street parking or other design features that may present safety hazards.

The County is currently planning to update its Circulation Element to reflect changes to the roadway network identified in the Roadway Design and Engineering Study in the County's ATP. The updated Circulation Element will identify specific upgrades and improvements needed to serve projected growth to support the needed improvements. Additionally, the County's existing planning process requires applicants to improve roadways and intersections directly serving the project. These improvements commonly take the form of additional travel and turning lanes, intersection signalization and timing changes, bicycle lanes, sidewalks, pedestrian crossings, street lighting, and signage. Additionally, the County requires payment of Transportation Impact Mitigation Fees under County Code Chapter 23C, which contribute fair-share funding to offsite transportation improvements needed to serve regional growth. However, as described in Impact T-1, the County's CIP, TIPs, and Transportation Impact Mitigation Fees do not currently factor in more recent housing, population, and employment trends, including the newest 6th Cycle RHNA for Santa Barbara County. Based on the sites inventory and potential maximum buildout assumptions, the proposed Project may result in new housing and population growth that would substantially exceed regional growth forecasts, including in communities like Eastern Goleta Valley and Orcutt where the TIPs do not account for the substantial growth associated with the Housing Element Update. Therefore, while site-specific transportation improvements would be funded by applicants, it is not certain that offsite or regional transportation infrastructure would be sufficient to meet the needs of all new developments accommodated under the proposed Project. Therefore, potential impacts associated with the proposed Project are considered *potentially significant*.

As the Housing Element Update addresses regional housing needs but is not required to conduct community planning or circulation planning, capital improvements planning of transportation facilities to adequately serve the selected housing sites and the projected growth would mitigate impacts to safety and roadway geometric issues. The existing transportation impact mitigation fees are out of date as it is based on growth projections that do not account for the proposed Project. **MM T-3 (Funding and Mitigation Fee Programs Update)** would require the County to update the County's CIP, TIPs, and Transportation Impact Mitigation Fees to fully fund and implement the required improvements to adequately serve the proposed Project, which could include roadway widening, additional travel or turn lanes, sidewalks, bike paths, crossings, intersection improvements and signals, lighting, signage, and other improvements to ensure safety and adequate transportation facilities. With this mitigation, impacts to roadway safety and geometric issues would be addressed and impacts would be *significant but mitigable*.

3.14.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of long-range plans, policies, and initiatives, as well as development projects

(housing and non-housing related) in the county and surrounding communities. Project impacts along with potential impacts from pending and current planning or development projects inform the cumulative impacts analysis. Included in the cumulative setting for the proposed Project are the housing element updates for each of the eight incorporated cities within the county. Under each of these cumulative projects, each agency is planning for how to meet local housing needs and the RHNA assigned by SBCAG by identifying potential sites for new housing development and implementing a variety of programs that would encourage or facilitate new residential development. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units. Other cumulative planning efforts include the Countywide Recreation Master Plan, which could facilitate or propose new rural recreation and agritourism improvements in rural and urban unincorporated areas, and the Agricultural Enterprise Ordinance. Individual development projects include cannabis cultivation projects, as well as 30 pending residential development projects proposing the development of up to 2,882 new units that would contribute to the County's ability to meet the RHNA for the unincorporated area. In addition, the cumulative setting also includes the Solomon Hills Project, which could involve the development of up to 4,000 new residential units and 600,000 sf of commercial uses (Table 3.0-7). The proposed Project would result in cumulatively considerable impacts if, in combination with other cumulative pending plans and projects, it would result in substantial inconsistencies with regional transportation plans, policies, and regulations or would generate substantial contributions to regional VMT, as discussed below.

Programs, Plans, Ordinance, and Plan Consistency

The proposed Project would result in cumulatively considerable impacts if, in combination with other cumulative pending plans and projects, it would result in substantial adverse impacts associated with inconsistencies with applicable transportation plans and policies. Included in the cumulative setting for the proposed Project are the housing element updates for each of the eight incorporated cities within the county. Similar to the proposed Project, the housing element updates for the eight incorporated cities are expected to increase VMT countywide while utilizing the same regional transportation network, and this cumulative growth exceeds projections in regional transportation plans like the Connected 2050 RTP/SCS. However, **MM T-1** and **MM T-2** would ensure the proposed Project would be consistent with regional transportation plans that apply to all jurisdictions in the county, including the Connected 2050 RTP/SCS. Therefore, the proposed Project's contribution to cumulative impacts would be *significant but mitigable*.

Cumulative Impacts to VMT

The analysis of cumulative impacts considers the combined impacts of the project and other closely related past, present, and reasonably foreseeable future projects. As described in Section 3.14.4.1, *Thresholds of Significance*, a land use plan could change travel patterns in the region, and an efficiency-based threshold may not fully capture such changes. Therefore, land use plans are subject to an absolute threshold of significance (i.e., change in total VMT countywide) by the County. The plan's contribution to a VMT impact would be cumulatively considerable if the total VMT is higher in the future with the proposed Project.

Table 3.14-12 summarizes the net change in VMT under the Future (i.e., 2031) with Housing Element Update compared to the Future No Project for the county and each of the five HMAs. The Project's total VMT is approximately 2,606,326 miles greater under the Future with Housing Element Update. The total VMT is also greater in each of the five HMAs under the Future with Housing Element Update. Therefore, the proposed Project would have a *significant and unavoidable* cumulative VMT impact.

Table 3.14-12. Cumulative VMT Impact Summary (Total VMT)

Region	Future No Project (2031)	Future With Housing Element Update (2031)	Percent Change from Future No Project	Significant Cumulative VMT Impact?
Unincorporated Areas Countywide	8,521,343	11,127,670	31%	Yes
South Coast	3,993,172	4,668,827	17%	Yes
Lompoc Valley	1,442,974	1,532,616	6%	Yes
Santa Ynez Valley	1,027,355	1,176,377	15%	Yes
Santa Maria Valley	1,862,820	3,099,601	66%	Yes
Cuyama Valley	195,022	650,248	233%	Yes

Note:
Given the countywide baseline total VMT per service population of 39.5, the County's threshold (i.e., 15-percent reduction) for total VMT per service is 33.6. A total VMT per service population greater than 33.6 will result in a VMT impact.
Source: Fehr & Peers 2023; Appendix F.

In some cases, land use plans may change the allocation of growth within the county, and reporting the net change in total VMT helps to inform how the land use changes affect overall VMT in the county. However, in other cases, such as the Housing Element Update, substantial growth is being proposed in comparison to growth already envisioned in the 2050 Connected RTP/SCS. Therefore, while the project-level VMT analysis may not indicate a significant impact for the South Coast, a cumulative impact can still occur because total VMT increases in all HMAs and the county. The net change in VMT summarized in Table 3.14-12 is unavoidable in the context of the No Net Loss Law (Government Code Section 65863; SB 166), which requires adequate housing sites to be maintained at all times throughout the planning period to accommodate the remaining RHNA target by each income category, including the County's 15 percent buffer for lower- and moderate-income affordability levels.

Concurrent development of housing development enabled under the Housing Element Update combined with pending or approved planning projects, and residential, commercial, and mixed use development within the county would increase countywide VMT. In particular, Housing Element Updates for the incorporated cities have the potential to generate substantial new VMT throughout the county, with particular increases in traffic along commuter highways that transit the rural areas such as U.S. Highway 101 through the Gaviota Coast, Buellton, and Santa Maria Valley and SR 154 through the Santa Ynez Valley. In addition, potential rural recreational and agritourism and other types of development enabled under the Agricultural Enterprise Ordinance and the Countywide Recreation Master Recreational Benefit Program could incrementally increase VMT on these highways, as well as the County's rural road system.

These projects, in conjunction with the Housing Element Update, have the potential to result in cumulative transportation impacts related to total VMT in the county. While it is impossible to determine the cumulative increases in VMT from pending or approved planning projects, given the County's current adopted thresholds for cumulative VMT analysis and the likelihood that total roadway VMT would increase under cumulative conditions, the contribution of the Housing Element Update to these cumulative impacts would be cumulatively considerable. Given the inability to effectively reduce VMT beneath County thresholds in the Lompoc Valley, Santa Ynez Valley, and Cuyama Valley under the Housing Element Update and substantial increases in VMT under future

development and housing element updates of the incorporated cities and the Countywide Recreation Master Plan through mitigation strategies, cumulative impacts on VMT are considered *significant and unavoidable*.

Design Features and Hazards

The proposed Project would result in cumulatively considerable impacts if it, in combination with other cumulative pending plans and projects, would result in substantial adverse impacts associated with geometric design features or traffic safety hazards. As described in Impact T-3, the proposed Project does not include or facilitate any improvements to the local transportation network within the county. While the details for future residential development projects (e.g., site plans, driveway locations, landscaping, utilities) are unknown, all individual housing projects would be subject to the County's review process and would be subject to compliance with adopted standards and regulations. This includes compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details, which address adequate driveway line of sight, turning movements, and other geometric design considerations. Compliance with these adopted standards and regulations would ensure that the proposed Project would not substantially contribute to cumulatively significant impacts.

Implementation of the proposed Project would result in the addition of nearly 325,000 trips as a result, a 41 percent increase from existing conditions (Fehr & Peers 2023; Appendix F). These additional trips, when considered with trips generated by cumulative projects (including the development of 19,192 new units as a part of the housing element updates that are under preparation by the eight incorporated cities) would contribute to potential exceedance in local roadway capacities. This is particularly true in the Eastern Goleta Valley, where the residential and mixed use development enabled under the County's Housing Element Update would be located near residential and mixed use development under the housing element updates that are being prepared by the City of Goleta and the City of Santa Barbara.

The County's existing planning process requires applicants to improve roadways and intersections directly serving the project. These improvements commonly take the form of additional travel and turning lanes, intersection signalization and timing changes, bicycle lanes, sidewalks, pedestrian crossings, street lighting, and signage. Additionally, the County requires payment of Transportation Impact Mitigation Fees under County Code Chapter 23C, which contribute fair-share funding to offsite transportation improvements needed to serve regional growth. However, as described in Impact T-1, the County's CIP, TIPs, and Transportation Impact Mitigation Fees do not currently factor in more recent housing, population, and employment trends, including the newest 6th Cycle RHNA for Santa Barbara County. **MM T-3 (Funding and Mitigation Fee Programs Update)** would require the County to update the County's CIP, TIPs, and Transportation Impact Mitigation Fees to fully fund and implement the required improvements to adequately serve the proposed Project, which could include roadway widening, additional travel or turn lanes, sidewalks, bike paths, crossings, intersection improvements and signals, lighting, signage, and other improvements to ensure safety and adequate transportation facilities. With this mitigation, impacts to roadway safety and geometric issues would be addressed and the proposed Project's contribution to cumulative impacts would be *significant but mitigable*.

3.14.4.4 Proposed Mitigation

MM T-1. Site-based TDM. Applications for multifamily housing and mixed use housing projects shall implement site design strategies to reduce vehicle trips to and from the project site. Site-based TDM strategies may include but not be limited to VMT-reducing measures identified in the CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021). The following site-based TDM measures shall be integrated into project design and plans ~~as feasible~~ based on site and project conditions:

- **Provide Pedestrian Network Improvements**. This measure requires developers to provide pedestrian connections from the project site ~~frontage~~ to and between existing facilities, including existing pedestrian routes. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive for short-distance trips. This mode shift results in a reduction of up to 6.4 percent of VMT.

- **Construct or Improve Bike Facilities**. This measure requires projects located adjacent to existing and planned improvements identified in the County ATP to construct or improve bicycle facilities (Class I, II, III, or IV), including providing connections where appropriate through the site to the existing bikeway network in the project vicinity. Providing bicycle infrastructure helps to improve biking conditions within an area. This encourages a mode shift on the roadway parallel to the bicycle facility from vehicles to bicycles, reducing VMT up to 0.8 percent.

- **Provide Bike Parking**. This measure requires projects to provide short-term and long-term bicycle parking facilities. Parking can be provided in designated areas or added within rights-of-way.

- **Implement a Homeowners' Association (HOA) Subsidized or Discounted Transit Program or other Ridesharing/Carpool and Education Program.** This measure requires projects located within one mile of a transit stop to provide subsidized, discounted, or free transit passes for residents within the project's HOA. Reducing the out-of-pocket cost of choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This program would also facilitate ridesharing and carpooling among the project's residents and educate residents about opportunities to use active transportation rather than drive a vehicle.

Requirements and Timing: The site-based TDM plan shall be prepared by the applicant and submitted as part of project application materials. County P&D and the Transportation Division shall review and confirm that all feasible site-based TDM measures are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans. The applicant shall estimate the effectiveness of the site-based TDM measures in reducing project VMT.

Monitoring: County P&D and the Transportation Division shall ensure that the site-based TDM plan is included as part of the project application and that all required measures are reflected in the project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that all required TDM measures are constructed onsite and offsite, as required. Building inspectors shall ensure that measures have been built or incorporated according to the approved plans.

MM T-2. Construction Traffic and Access Management Plan. Applications for housing projects shall prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic and Access Management Plan shall be designed to:

- Prevent traffic impacts on the surrounding roadway network; and
- Ensure safety for both those constructing the project and the surrounding community; and

The Plan shall, at a minimum, include the following:

- Designated haul routes;
- Designated Alternate Pedestrian Access Routes, consistent with ADA and the Public Rights-of-Way Accessibility Guidelines;
- Onsite staging, which would avoid residential streets to the maximum extent feasible;
- Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction) to address circulation requirements and public safety;
- Construction crew parking; and
- Emergency access provisions including training for flagmen.

Ongoing Requirements throughout construction:

- A detailed Construction Traffic Control Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. Such plans shall be reviewed and approved by the County Planning and Development Department, in coordination with the County Public Works Department, prior to issuance of a demolition, excavation, grading, or building permit and implemented in accordance with this approval.
- Temporary alternative pedestrian access routes with basic accessible features shall be designated whenever an existing pedestrian access route is closed for construction.
- Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself.

Requirements and Timing. The required plan shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations of the project's noise study, as applicable, are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans. Prior to project implementation, the applicant shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, and media listing/notification), as well as provide a call line for complaints and concerns regarding construction traffic. The applicant shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, local police and fire departments, County Public Works Department, and County P&D) and all owners and residential and commercial tenants of property within a radius of 500 feet before project implementation. The applicant shall coordinate construction work with affected agencies in advance of the start of work. The applicant shall obtain approval from the County for any haul routes for earth, concrete, or construction materials and equipment hauling.

Monitoring. County P&D shall ensure that the plan is included as part of the project application and that all recommendations are reflected in the project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that all required construction noticing and reporting requirements are completed before ground disturbance. Building inspectors shall ensure that all measures have been incorporated according to the approved plans.

MM T-3. Funding and Mitigation Fee Programs Update. The County shall update the funding and fee mitigation programs.

- **Evaluate the County's ATP.** The County shall review and evaluate the County's ATP and/or previously adopted community plans for active transportation improvements that would directly serve the selected housing sites in the adopted Housing Element Update. These improvements shall become required mitigation for the proposed Project, where feasible.
- **Update Funding and Mitigation Fee Programs**. The County shall update its CIP, TIPs, including Goleta and Orcutt, create TIPs for communities that require substantial transportation improvement planning and funding, and the County's Transportation Impact Mitigation Fees (Chapter 23C of the County Code). The Transportation Impact Mitigation Fees shall reflect the fair-share contribution of new housing development to capital improvements identified in the CIP, TIPs, and/or the ATP, that mitigate transportation impacts from the Housing Element Update.

Requirements and Timing: The County shall complete MM T-3 within 2 years of the Housing Element Update adoption. All housing projects under the Housing Element Update shall pay ~~updated~~ fair-share mitigation fees in accordance with the adopted mitigation fee program.

Monitoring: The County P&D Department shall ensure that this measure is included in the annual budget and work program for the second fiscal year following the adoption of the Housing Element Update.

3.14.4.5 Secondary Impacts

Transportation improvements that may arise from the implementation of **MM T-1**, **MM T-2**, and **MM T-3** could have secondary impacts related to construction and roadway operations, but these improvements would be considered projects under CEQA and subject to environmental review of project-specific impacts. Therefore, no secondary impacts are associated with the proposed Project.

3.14.4.6 Residual Impacts

Impact T-1. To ensure consistency with SBCAG and County transportation and circulation policies and programs and mitigate the potential impacts, **MM T-1** would ensure objective site-specific transportation demand management and multi-modal infrastructure to support the transportation needs of the residential or mixed use project fostered by the Housing Element Update. **MM T-2** would further ensure regional transportation demand management and multi-modal infrastructure planning are conducted and funded by the County in combination with other agencies to provide a transportation system that sufficiently serves the projected growth and development under the Housing Element Update. These mitigation measures would be implemented as a direct result of Housing Element Update adoption to ensure the County's TIPs, CIP, and fee programs are updated before potential housing site development to ensure a fair-share contribution to avoid the potentially

significant impact. With these mitigation measures, the impacts related to transportation plan consistency would be *significant but mitigable*.

Impact T-2. As described above, the residential and mixed use development enabled under the Housing Element Update would result in a significant and unavoidable project-level VMT impact in four HMAs in North County. The implementation of **MM T-1** would reduce this impact to some extent; however, it would remain *significant and unavoidable*.

Impacts T-3. Construction activities associated with the residential and mixed use development enabled under the Housing Element Update could result in potentially significant construction-related impacts. However, the **MM T-2** would require the preparation of Construction Traffic and Access Management Plans for residential and mixed use development involving encroachment into the public right of way. With the preparation and implementation of these plans, which would address construction traffic routing and control, vehicle, bicycle, and pedestrian safety, street closures, and construction parking, these impacts would be *significant but mitigable*.

While the details for future residential development projects (e.g., site plans, driveway locations, landscaping, utilities) are unknown, all individual projects as enabled under the Housing Element Update would be subject to the County's ministerial review process. While Program 2, Use by Right Approval of the Housing Element Update would streamline the review of many potential rezone sites, all projects enabled under the Housing Element Update would still be subject to compliance with adopted standards and regulations. This includes compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details, which address adequate driveway line of sight, turning movements, and other roadway design and operational requirements. Compliance with these adopted standards and regulations would ensure that impacts would be *insignificant*.

However, the increased traffic on these affected roadways could be substantial and exceed the County's design capacities for existing roadways and intersections, particularly in the South Coast (Eastern Goleta Valley) and Santa Maria Valley (Orcutt). The County's existing planning process requires applicants to improve roadways and intersections directly serving the project. Additionally, the County requires payment of Transportation Impact Mitigation Fees under County Code Chapter 23C, which contribute fair-share funding to offsite transportation improvements needed to serve regional growth. However, the County's CIP, TIPs, and Transportation Impact Mitigation Fees do not currently factor in more recent housing, population, and employment trends, including the newest 6th Cycle RHNA for Santa Barbara County. Therefore, while site-specific transportation improvements would be funded by applicants, it is not certain that offsite or regional transportation infrastructure would be sufficient to meet the needs of all new developments accommodated under the proposed Project. However, with the implementation of **MM T-3**, potential impacts associated with the proposed Project would be *significant but mitigable*.

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Section 3.15
Utilities and Water Supply

3.15.1 Introduction

This section describes the potential impacts on utilities, utility infrastructure, and water supply that could result from future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). Issues discussed in this section include municipal water supply and demand, wastewater generation and treatment capacity, and solid waste generation and disposal capacity (e.g., landfills). This analysis describes the physical setting for municipal utilities serving unincorporated areas of Santa Barbara County and regulations that apply to the supply, treatment, and disposal of water, wastewater, and solid waste. This section provides a water supply analysis per the requirements of Section 15155 of the California Environmental Quality Act (CEQA) and Section 10910 of the California Water Code.

Issues related to water quality, hydrologic resources, stormwater runoff, and groundwater and surface water resources, are discussed in more detail in Section 3.9, *Hydrology and Water Quality*. The analysis of public services, including fire protection, law enforcement, schools, and parks/recreation, is provided in Section 3.13, *Public Services and Recreation*. The analysis of energy services, including electricity and natural gas, is addressed in Section 3.6, *Energy*.

3.15.2 Environmental Setting

3.15.2.1 Water

Water Infrastructure and Improvements

Municipal water supplies are stored, treated, and conveyed to customers through an extensive network of water infrastructure serving urban communities throughout the county, including three surface reservoirs (i.e., Lake Cachuma, Jameson Lake, and Gibraltar Reservoir), water distribution systems, desalination, and water treatment facilities. Communities in Santa Barbara County rely on a range of water supplies; as a result, a wide variety of treatment processes are in use. Some communities receive surface water that is treated under the Surface Water Treatment Rule (SWTR). Others rely on groundwater that is treated under federal and state drinking water regulations. Most communities receive both treated surface water and groundwater in their systems, as further described below, and some communities, such as those near the City of Santa Barbara, receive desalinated ocean water (County of Santa Barbara 2019).

Much of the County's water infrastructure is more than 40 years old and several key parts need to be evaluated to comply with increasingly stringent regulatory requirements, including drinking water quality standards for disinfection byproducts that require expensive new treatment components (County of Santa Barbara 2019). For example, increasing the reliability of wells in the Santa Ynez River alluvium requires the development of a regional water treatment plant to comply with the SWTR (Section 3.15.3.1, *Federal Regulatory Setting*). Another example is that portions of the South Coast

Conduit, built in the 1950s, need to be expanded or replaced to meet increasing demand and to provide adequate reliability. Further, Jameson, and Gibraltar Reservoirs, and to a lesser extent Lake Cachuma, are being filled with sediment, reducing their storage capacity and making it increasingly important to enhance local water supply reliability through conservation and other methods, as further explained below (County of Santa Barbara 2019). Information about existing water infrastructure issues is summarized below in *Municipal Water Supply Reservoirs and Groundwater Sources* and is discussed in greater detail in Section 3.9, *Hydrology and Water Quality.*



As the largest surface water source in the county, Lake Cachuma has a capacity of approximately 192,978 AF as of 2023 and serves water demands of the South Coast.
Source: Cachuma Operation and Maintenance Board

Additionally, urban delivery infrastructure must be modified on an ongoing basis to meet the needs of a growing population; upgrades are needed to reduce water loss, prevent increased inflow and infiltration during storms, and improve performance for existing and future development. Through the existing planning processes and authorization from water agencies, water lines are typically installed or upgraded as a part of new development, if necessary, to increase capacity to serve the individual sites. Water lines must be sized sufficiently to accommodate both day-to-day customer needs and fire flow needs, which are significantly higher than domestic water needs. Upgrades to water lines are generally triggered by the age of each affected line or as a part of new development where additional capacity is needed (County of Santa Barbara 2019).

Water Pressure

Water pressure is also an important factor in the design and operation of a municipal water supply system. Adequate water pressure is necessary to ensure that water can be properly distributed throughout a service area from pumps, reservoirs, or storage facilities. It is also important that adequate water pressure exists to allow the proper functioning of multiple water fixtures and appliances (e.g., sinks, showers, dishwashers). Various state and local regulations exist that require owners of public water systems to maintain systems and deliver water under specific pressure ranges (California Fire Code 2019; California Plumbing Code 2022). Further, the County Code and California Fire Code (CFC) mandate the installation of automatic fire sprinklers or suppression systems in certain types of new development projects or projects located in areas subject to heightened fire risk, as well as to ensure adequate flow from fire hydrants. Adequate water pressure in areas serving new development is necessary to ensure compliance with these standards, which include minimum flow requirements.

To ensure adequate water pressure within their service areas, municipal water service providers serving the unincorporated areas of the county maintain their systems and manage water pressure through a system of gravity flow, water pumps, and pressure-reducing valves. For instance, on the South Coast, many of the water service districts (e.g., Goleta Water District, Carpinteria Water District, City of Santa Barbara, Montecito Water District) have water tanks and reservoirs located at higher elevations in the foothills of the Santa Ynez Mountains that allow for gravity flow to create high-pressure zones in the foothills and lowland areas. Within these high-pressure zones, pressure-reducing valves or regulators may be required to reduce pressure. As water is conveyed through the

system to the flatter, lower-lying areas, water pressure may decrease, resulting in lower pressure zones and requiring the use of water pumps to raise water pressure. Generally, pressure can be more easily maintained in higher pressure zones and for more typical domestic customers like lower-density residential and commercial uses. However, adequate water pressure may be more difficult to provide for higher-density development with more onsite demands or taller structures, which could require higher pressures to provide adequate water flow for individual functions, such as automatic fire sprinkler systems, as well as firefighting.

State Water Project and Central Coast Water Authority

The Central Coast Water Authority (CCWA) was formed in 1991 to finance, construct, manage, and operate Santa Barbara County's State Water Project (SWP) facilities. Construction of the facilities to import SWP water to the County began in 1994, including a 42-mile extension of the SWP water pipeline, pumping plants, and a regional treatment plant to treat the water for San Luis Obispo and Santa Barbara Counties. The Coastal Branch portion of the SWP brings water 117 miles from the California Aqueduct in Kern County, through San Luis Obispo County and the Santa Maria Valley, and continuing to the northerly portion of Vandenberg Space Force Base (VSFB). At VSFB, the Coastal Branch connects to the 42-mile pipeline comprising the Mission Hills and Santa Ynez Extensions. The Santa Ynez section ends at Lake Cachuma. Water is then delivered through existing facilities to the South Coast of Santa Barbara County. In addition, under a joint powers agreement with the California Department of Water Resources (DWR), CCWA operates all of the Coastal Branch facilities downstream of the treatment plant (County of Santa Barbara 2019).

Existing Water Supply and Demand

The unincorporated areas of the county are served by 12 water agencies that provide municipal water supply services, excluding small mutual water companies serving limited customers and water providers serving areas outside of the County's jurisdiction (e.g., City of Buellton). Combined, these purveyors have the capacity to provide approximately 71,486 acre-feet per year (AFY) countywide. Existing water customers consume approximately 47,015 AFY, which leaves approximately 24,470 AFY in available water supplies countywide. However, the availability of water between purveyors and regions of the county varies. For example, while the Santa Ynez River Water Conservation District Improvement District #1 has approximately 5,118 AFY of remaining capacity available, which could accommodate modest growth in urban land uses in existing communities, the Casmalia Community Services District (CSD) water supplies are potentially more limited and without a comprehensive review of existing supply and storage facilities may only serve minor infill development in the community. Further, water agencies serving urban communities generally have large supplies but also larger customer bases to support (Table 3.15-1).

Water supplies for the county as a whole primarily come from groundwater. In 2022, groundwater supplied 53 percent of the water supply (and has historically supplied approximately 75 percent), and surface water accounted for 26 percent of the total supply, followed by 14 percent for purchased/imported water, 4 percent from desalinated water, and 3 percent from recycled water (WaterWise Santa Barbara County 2022; County of Santa Barbara 2019).[1] The Goleta Water District, serving the Eastern Goleta Valley on the South Coast, is the only water purveyor to rely on significant sources of recycled water supplies (County of Santa Barbara 2022).

[1] The percentages provided are for the county as a whole, including incorporated cities and Vandenberg Space Force Base.

Table 3.15-1. Existing Municipal Water Suppliers and Demands Serving Unincorporated Areas of Santa Barbara County

Major Water Suppliers[1]	Housing Market Area Served	Source of Water Supply (% of total supply)[2]	Current Service Capacity (AFY)	Current Service Use (AFY)	Remaining Available Water Supply (AFY)
Cuyama CSD	Cuyama	Groundwater (100%)	171.09	127	44.09
Los Alamos CSD	Lompoc	Groundwater (100%)	605	230	375
Mission Hills CSD	Lompoc	Groundwater (100%)	1,200	500	700
Vandenberg Village CSD	Lompoc	--	2,465	1,400	1,065
Casmalia CSD	Santa Maria	Purchased Water (100%)	9.28[4]	9-10	0 – 0.28
Golden State Water District – Orcutt	Santa Maria	Groundwater (98.2%) Purchased Water (1.8%)	6,481	6,481	0
Santa Ynez River Water Conservation District Improvement District #1	Santa Ynez	Groundwater (39.7%) Purchased Water (60.3%)	8,933[3]	3,815[3]	5,118
Carpinteria Valley Water District (CVWD)	South Coast	Groundwater (19.0%) Surface Water (81.0%)	5,200	4,000	1,200
City of Santa Barbara[1]	South Coast	--	20,760	13,890	6,870
Goleta Water District[1]	South Coast	Groundwater (7.1%) Surface Water (81.3 %) Purchased Water (5.2%) Recycled Water (6.3%)	16,172	11,029	5,143
La Cumbre Mutual Water Company	South Coast	Groundwater (53.6%) Purchased Water (SWP) (46.4%)	1,343	1,234	109

Table 3.15-1. Existing Municipal Water Suppliers and Demands Serving Unincorporated Areas of Santa Barbara County (Continued)

Major Water Suppliers[1]	Housing Market Area Served	Source of Water Supply (% of total supply)[2]	Current Service Capacity (AFY)	Current Service Use (AFY)	Remaining Available Water Supply (AFY)
Montecito Water District	South Coast	Groundwater (0.5%) Surface Water (43.3%) Imported Water (56.2%)	8,147	4,300	3,847
Total (Approx.)		**--**	**71,486**	**47,015**	**24,470**

Notes:
[1] Table only includes water agencies that serve unincorporated areas of Santa Barbara County and does not include water purveyors that do not provide potable water services to lands within the County's jurisdiction (e.g., VSFB). Some water agencies serve both unincorporated and incorporated areas such as the Goleta Water District and the City of Santa Barbara.
[2] Water supply sources and percentages are compiled from relevant Urban Water Management Plans (UWMPs) and the 2019 Santa Barbara Integrated Regional Water Management Plan (IRWMP)
[3] No direct response was received, data are from LAFCO 2022
[4] No service capacity was provided by Casmalia CSD, data are from the 2019 Santa Barbara IRWMP and represent purchases at that time. Service use range was provided by Casmalia CSD.
Sources: City of Buellton Public Works Department 2022; Carpinteria Valley Water District and Woodard and Curran 2021; Goleta Water District and Woodard and Curran 2021; City of Lompoc and Water Systems Consulting, Inc. (WSC) 2021; Dudek 2019; City of Santa Barbara Water Resources Division and WSC 2021; Provost and Pritchard Consulting Group 2021; Golden State Water Company, Tully and Young, and Zanjero 2021; Montecito Water District and Tully and Young 2021.

Municipal Surface Water Supply Reservoirs and Groundwater Sources

Three of the county's four major reservoirs are managed for municipal water supply, as well as groundwater recharge, flood control, recreation, and ecological benefits.[2] Lake Cachuma, Gibraltar Reservoir, and Jameson Lake are all located in the Santa Ynez River Watershed. The three reservoirs on the Santa Ynez River supply the majority of the water used in the South Coast area of Santa Barbara County and for Santa Ynez downstream users, as further described below (County of Santa Barbara 2019):

- **Lake Cachuma** is owned and operated by the federal government. Lake Cachuma was completed in 1956 with a design storage capacity of approximately 205,000 acre-feet (AF) at 750 feet in elevation. The reservoir capacity has been reduced to approximately 192,978 AF as of 2023 due to the accumulation of silt in the reservoir. Flashboards were installed at Bradbury Dam in 2004 raising the maximum reservoir elevation by 3 feet, which increased the capacity. The principal features of the Cachuma Project are Bradbury Dam, Lake Cachuma, Tecolote Tunnel, and the South Coast Conduit distribution systems. Included in the main conduit system are four regulating reservoirs (Glen Anne, Lauro, Ortega, and Carpinteria) and the Sheffield Tunnel. The Cachuma Project was designed as a gravity flow system. To make efficient deliveries to the South Coast, the intake tower for the Tecolote Tunnel was placed in a bay in the mid-shoreline section of the lake.

[2] Twitchell Reservoir, the fourth reservoir in the county, provides flood protection and groundwater recharge but does not store water for direct municipal use.

Water flows via gravity through the Tecolote Tunnel into the South Coast Conduit to Carpinteria Reservoir. Sedimentation has reduced the gravity operational capacity of Lake Cachuma by blocking the lowest intake gate. If the reservoir elevation recedes below the operational gates at the intake tower, water has to be pumped from the lake into the intake tower. The supply disruptions recently have been due to drought, sedimentation, and the inability to gravity flow through the system.

- **Jameson Lake** is owned and operated by the Montecito Water District. Jameson Lake was dedicated in 1930 with a design storage capacity of 7,500 AF. Water is transported to the South Coast through the Doulton Tunnel. As of 2023, Jameson Lake stores 4,848 AF. The unincorporated community of Montecito receives 45 percent of its water supply from Jameson Lake and Fox and Alder Creeks via the Doulton Tunnel, so the ongoing loss of storage capacity is an issue of concern.
- **Gibraltar Reservoir** is owned and operated by the City of Santa Barbara. Gibraltar Reservoir was completed in 1920 with a design storage capacity of 14,000 AF. Although the dam was raised 23 feet in 1948, the current storage capacity of the reservoir in 2023 has been reduced to 4,693 AF. Water from the reservoir is transported through the Mission Tunnel to the South Coast. The reservoir is the source of approximately one-third of the City of Santa Barbara's water supply. The long-term loss of storage capacity is mitigated by the pass-through provision of the Upper Santa Ynez River Operations Agreement, which allows the City of Santa Barbara to pass through Gibraltar's yield and deliver it through Cachuma Reservoir.

Table 3.15-2 provides a summary of the existing maximum capacity/available storage and current water in storage for each of the three reservoirs, along with the total estimated usable water in storage in each groundwater aquifer and the existing annual groundwater pumping. As of August 2023, the county's reservoirs have a combined current capacity of 202,519 AF with current storage of 193,998 AF, approximately 95.8 percent of the maximum capacity. Further, the approximately 261,750 AFY of groundwater supplies are drawn from local groundwater basins, representing approximately 5.4 percent of the estimated usable water in storage.

State Water Project (Imported Water)

The SWP is a multi-purpose water storage and delivery system that is planned, built, operated, and maintained by DWR. In 1963, the Santa Barbara County Flood Control and Water Conservation District (SBCFCWCD) contracted with DWR to deliver SWP water to Santa Barbara County. Beginning in 1997, the CCWA began to deliver SWP water to Lake Cachuma, where it is mixed with Cachuma Project water and delivered through the Tecolote Tunnel to contractors on the South Coast. (Santa Barbara County Public Works Department, Water Resources Division 2013).

Table 3.15-2. Local Sources of Existing Municipal Water Supply

Surface Water Supply Source	Maximum Capacity/Storage (AF)	Current Storage (AF) (% of Capacity)
Cachuma Reservoir	192,978	185,881 (96.3%)
Gibraltar Reservoir	4,693	3,308 (70.5%)
Jameson Reservoir	4,848	4,809 (99.2%)
Total	**202,519**	**193,998 (95.8%)**
Groundwater Supply Source	**Estimated Usable Water in Storage (2014)**	**Annual Draw (2020) (AFY)**
Santa Maria River Valley Basin	1,100,000 AF	97,982
San Antonio Creek Valley Basin	800,000	23,750
Cuyama Valley Basin	1,500,000	41,059
Santa Ynez River Valley	1,314,000	54,979
Carpinteria Basin	16,000	8,623
Montecito Basin	16,100	3,084
Santa Barbara Basin	10,000	530
Foothill Basin	5,000	284
Goleta Basin	70,000	4,404
Total	**4,831,100**	**234,695**

Notes:
For further details regarding groundwater basin supply, allocation, and yield, see Section 3.9, *Hydrology and Water Quality.*
Statistics provided in this table are current as of August 21, 2023 (for reservoir data), and 2014/2020 (for groundwater data), but storage capacity fluctuates annually and throughout the year.
All values are reported in AF.
Source: Santa Barbara County Public Works Department, Water Resources Division 2014; Santa Barbara County Flood Control District 2023; DWR 2020.

Each year, DWR announces SWP Table A allocations which inform water contractors' SWP deliveries. Table A allocations represent "a portion or all of the annual Table A amount requested by SWP water contractors and approved for delivery by DWR" (DWR 2019). The Table A allocation differs each year and also may change over the course of the year to reflect the actual and forecast water supply. Table 3.15-3 shows the amount of water to which each Santa Barbara County participant in the SWP has a contractual right (Table A amounts). Actual deliveries may be less than shown due to supply limitations and request reductions. Historically, deliveries have ranged from 30 percent to 100 percent since the region began importing SWP water. Each project participant is also entitled to a drought buffer amount which totals 6,408 AFY for all participants (this includes a special drought buffer of 2,500 AFY for Goleta Water District), which increases the reliability of their Table A amount (Dudek 2019). This can be stored for future use and/or requested in dry years when cutbacks are expected to SWP allocations. Lastly, "Article 21" deliveries allow water contractors to take deliveries above approved and scheduled Table A amounts (DWR 2019). Article 21 is sometimes called interruptible, unscheduled, or surplus water, and is offered predominantly in wet years (California Water Blog 2020).

Table 3.15-3. Santa Barbara County SWP Participant Table A Amounts

CCWA SWP Participant	Table A Amount (AFY)		
	Original Table A	Drought Buffer	Total Table A
City of Buellton	578	58	636
Carpinteria Valley Water District	2,000	200	2,200
Goleta Water District[1]	4,500	2,950	7,450
City of Guadalupe	550	55	605
La Cumbre Mutual Water Company	1,000	100	1,100
Montecito Water District	3,000	300	3,300
Morehart Land Company	200	20	220
City of Santa Barbara	3,000	300	3,300
Raytheon Company	50	5	55
City of Santa Maria	16,200	1,620	17,820
Santa Ynez River Water Conservation District, Improvement District #1	2,000	200	2,200
Golden State Water Company – Orcutt	500	50	550
Vandenberg SFB	5,500	550	6,050
Total[2]	**39,078**	**6,408**	**45,486**

Notes:
[1] The drought buffer includes 3,908 AFY for CCWA supply and conveyance capacity. Goleta Water District also has a 2,500 AFY drought buffer for supply only with no associated conveyance capacity.
[2] Total provided is for the county as a whole, including SWP participants who serve only incorporated areas of the county.
Source: CCWA and Provost and Pritchard Consulting Group 2020.

Recycled Water

Recycled water must meet rigorous water quality standards before it can be reused. Various treatment technologies are approved for the treatment of recycled water under Title 22 of the California Code of Regulations but generally, they are all referred to as tertiary treatment. Currently, three agencies in the county treat all of their effluent to full tertiary levels. These agencies are the Laguna County Sanitation District, the City of Lompoc, and the Summerland Sanitary District. The Laguna County Sanitation District produces approximately 2,242 AFY, which is used for agricultural, landscaping, and industrial purposes, with recycling as its only discharge mechanism (Santa Barbara County Resource Recovery and Waste Management Division [RRWMD] 2018)]. The City of Lompoc can sell 69 AFY of recycled water for reuse, and the Summerland Sanitary District treats approximately 168 AFY, which is discharged to the Pacific Ocean (Santa Barbara County Public Works Department 2018).

Two other agencies treat some of their flow to tertiary levels for reuse as landscape irrigation: the City of Santa Barbara and the Goleta Sanitary District. The City of Santa Barbara's recycled water system has a distribution capacity to deliver 1,400 AFY. However, due to process and infrastructure issues, the city currently provides only 800 AFY of recycled water to users. The Goleta recycled water system is operated jointly by the Goleta Sanitary District and the Goleta Water District, which acts as the purveyor/retailer of the recycled water to its customers. The system currently serves approximately 785 AFY of recycled water (Santa Barbara County Public Works Department 2018). The 2013 Integrated Regional Water Management Plan (IRWMP) included a target of 7,035 AFY

recycled water use by 2035, and this continues to be the goal that recycled water projects are aiming to achieve.

Desalinated Water

Within the county, the City of Santa Barbara is the only entity that provides desalinated water as a municipal water source. The City of Santa Barbara constructed the Charles E. Meyer desalination facility, a reverse osmosis seawater desalination facility, as a drought and emergency supply, although it is permitted under various operating scenarios. In February 2021, the Santa Barbara City Council adopted a policy recommendation to operate ocean desalination as part of the City's water supply portfolio to support drought preparedness, response, and recovery. Under this policy, the desalination plant will operate within its current capacity (3,125 AFY) to protect and optimize the city's other water supplies and to enhance the city's ability to prepare for and respond to future drought conditions. Other studies carried out by the City of Santa Barbara have identified the expansion of the desalination plant to 5,000 AFY as a potential form of new water supply (City of Santa Barbara Water Resources Division and Water Systems Consulting, Inc. [WSC] 2021).

Water Conservation

Water conservation addresses the "demand side" of water management, and thereby constitutes an important part of stretching the county's water supplies. Through water conservation programs implemented at the regional and water purveyor level, additional water supplies become available for use within the county, reducing pressure on other water resources. Water conservation activities occur countywide through its Regional Water Efficiency Program (Dudek 2019). Water purveyors in the program, such as CVWD and Goleta Water District, among others, work cooperatively to implement conservation through residential, commercial, agricultural, and landscape programs (Santa Barbara County Public Works Department, Water Resources Division 2013). Additionally, regional education and public information programs help change behavior to decrease water use. Regional programs have been in place since 1990 and are staffed and funded by a multiagency team of conservation staff from the Santa Barbara County Water Agency (SBCWA) and local water purveyors. Water purveyors also implement individual programs of particular interest within their service areas. Water savings through conservation programs are calculated on an annual basis by those agencies that are members of the California Urban Water Conservation Council.

Future Water Supply and Demand

Projected future water supply and demand under normal conditions for some water districts are displayed in Table 3.15-4 below. Water purveyors subject to the California Urban Water Management Planning Act (UWMPA), which includes water service providers serving 3,000 or more service connections or providing more than 3,000 AFY of water supply, analyze existing and future water supplies in their Urban Water Management Plans (UWMPs), which are updated every five years. Several water agencies in the county do not meet the thresholds established by the UWMPA and therefore do not produce UWMPs, including La Cumbre Mutual Water Company, Santa Ynez River Water Conservation District Improvement District #1, Los Alamos CSD, Cuyama CSD, Casmalia CSD, Mission Hills CSD, or Vandenberg Village CSD. As shown based on available UWMPs, the larger water agencies generally project nominal increases in supply but fairly substantial demand through 2040, which would reduce the surplus supplies currently available in these agencies. In some areas, including the Goleta Water District and the Montecito Water District, projected demand is expected to exceed supplies by 2040. The one exception to these supply and demand trends is the Golden State

Water District - Orcutt, which actively balances water supply through the use of imported supplies to match demand. Taken together, by 2040, the growth rate in demand is expected to exceed the growth rate in water supplies by approximately 7.9 percent. Refer to Appendix H for additional available information about water supply during normal, single-dry, and multiple-dry years.

Table 3.15-4. Projected Future Normal Year Conditions for Municipal Water Suppliers and Demands Serving Unincorporated Areas of Santa Barbara County

Water Supply Agency[1]	Supply and Demand	2025 Projected	2030 Projected	2035 Projected	2040 Projected	Percent Increase (2025-2040)
CVWD	Supply	4,586	5,586	5,586	5,586	21.8%
	Demand	4,111	4,170	4,381	4,452	8.3%
	Difference	*475*	*1,416*	*1,205*	*1,134*	*138.7%*
City of Santa Barbara	Supply	20,760	22,580	22,530	22,480	8.3%
	Demand	13,890	14,600	14,580	14,720	6.0%
	Difference	*6,870*	*7,980*	*7,950*	*7,760*	*13.0%*
Goleta Water District	Supply	16,240	16,244	16,244	16,244	0.02%
	Demand	10,866	11,325	11,561	11,737	8.0%
	Difference	*5,374*	*4,919*	*4,683*	*4,507*	*-16.2%*
Golden State Water District – Orcutt	Supply	6,105	6,266	6,432	6,603	8.2%
	Demand	6,105	6,266	6,432	6,603	8.2%
	Difference	*0*	*0*	*0*	*0*	*0.0%*
Montecito Water District	Supply	8,147	8,630	8,613	8,595	5.5%
	Demand	4,635	4,764	4,869	4,999	7.9%
	Difference	*3,512*	*3,866*	*3,744*	*3,596*	*2.4%*
Total	**Supply**	**102,765**	**106,078**	**106,024**	**105,972**	**3.12%**
	Demand	**60,990**	**64,783**	**66,153**	**67,513**	**10.7%**
	Difference	***41,775***	***41,295***	***39,871***	***38,459***	***-7.9%***

Notes:
All values are reported in AFY.
[1] Smaller water districts that provide less than 3,000 AFY and serve fewer than 3,000 connections are not required to prepare a UWMP as part of Water Conservation Bill SBX7-7 (2009) and are subsequently not required to report and plan for future water supplies or demand.
Sources: CVWD and Woodard and Curran 2021; Goleta Water District and Woodard and Curran 2021; City of Lompoc and WSC 2021; City of Santa Barbara Water Resources Division and WSC 2021; Provost and Pritchard Consulting Group 2021; Golden State Water Company, Tully and Young, and Zanjero 2021; Montecito Water District and Tully and Young 2021.

Drought and Multiple Dry-Year Conditions

A drought occurs when climactic and weather conditions are drier than normal for a long period, resulting in less water available for people, agricultural uses, and ecosystems. Drought and water shortages are a gradual phenomenon and generally are not signified by one or two dry years. California's and the county's extensive system of water supply infrastructure (e.g., reservoirs, groundwater basins, and interregional conveyance facilities) generally mitigates the effects of short-term dry periods for most water users. However, drought conditions are present when a region receives below-average precipitation over an extended multiple-year period (e.g., three to four or more years), resulting in prolonged shortages in water supply (County of Santa Barbara 2022).

Longer-term droughts and multiple dry years can impact surface water reservoir storage levels in major reservoirs, such as Lake Cachuma, which provides about 85 percent of the water for over 200,000 residents of the South Coast of Santa Barbara County (Goleta Water District 2021). Longer-

term droughts can also impact water levels in major groundwater basins that are key to both urban and agricultural water supply. Drought impacts increase with the length of a drought, as carry-over supplies in reservoirs are depleted and water levels in groundwater basins decline (County of Santa Barbara 2022).

Water supply sources vary considerably across the county, with some water providers relying more heavily on reservoirs to supply water to their customers, and others more on groundwater or the SWP. Water sources also vary year to year, depending on rainfall levels, SWP supply, and conditions in each purveyor's district. Individual water purveyors use their own metrics to determine whether they are in a water shortage and thus whether watering restrictions are necessary. Water shortage categories are defined in each purveyor's Water Shortage Contingency Plan and are based on how well the purveyor's water supplies are projected to meet demand, rather than on dry climatological conditions. Depending on the water supply status, each purveyor may instate local rules for water use and conservation. Examples include limitations on irrigation, washing, and runoff, leak detection and repair, automatic shutoffs, and incentives for water-efficient fixtures and recycled water use. These requirements are commonly scalable in response to the severity of multi-year drought conditions, such as the drought that impacted California from 2012-2017, and triggered in response to local and statewide drought declarations (County of Santa Barbara 2023).

3.15.2.2 Wastewater

Wastewater Treatment Facilities and Capacity



Wastewater generated in the unincorporated areas of the county is treated at one of 14 WWTPs, including the Goleta Sanitary District, which processes approximately 8 million gallons per day. Source: Goleta Sanitary District.

Per the California Water Code and the State Water Resources Control Board (SWRCB), the Central Coast Regional Water Quality Control Board (RWQCB) regulates discharge permits for municipalities and special districts that operate wastewater treatment plants (WWTPs), consistent with the National Pollutant Discharge Elimination System (NPDES) program. NPDES regulates point sources that discharge pollutants into waters of the U.S. Currently, 16 wastewater service providers/districts manage wastewater services within unincorporated urban communities in Santa Barbara County, including service to at least a portion of unincorporated county lands or treatment of wastewater collected and conveyed by neighboring districts (Table 3.15-5). These include Cuyama CSD, Laguna County Sanitation District, Los Alamos CSD, Mission Hills CSD, Montecito CSD, and Summerland Sanitary District, as well as sanitation departments of some incorporated cities.

Table 3.15-5. Existing Wastewater Service Providers Serving Unincorporated Areas of Santa Barbara County

Wastewater Service Provider	Unincorporated County Area Served	Housing Market Area Served
Cuyama CSD	Unincorporated community of New Cuyama	Cuyama
City of Lompoc	VSFB, Vandenberg Village CSD	Lompoc
Mission Hills CSD	Unincorporated community of Mission Hills	Lompoc
Vandenberg Village CSD1	Unincorporated community of Vandenberg Village (effluent treated by the City of Lompoc)	Lompoc
City of Santa Maria2	A small portion of the unincorporated community of Orcutt	Santa Maria
Laguna County Sanitation District2	Unincorporated community of Orcutt and a small area of the southern part of the City of Santa Maria	Santa Maria
Los Alamos CSD	Unincorporated community of Los Alamos	Santa Ynez
Los Olivos CSD3	Unincorporated community of Los Olivos	Santa Ynez
Santa Ynez CSD1	Portions of Santa Ynez (collection and conveyance to Solvang WWTP); also manages, operates, and maintains the Chumash WWTP	Santa Ynez
Carpinteria Sanitary District	Unincorporated areas in the Carpinteria Valley	South Coast
City of Santa Barbara	Unincorporated areas adjacent to City boundaries and County-owned properties within City boundaries	South Coast
County Service Area (CSA) 121	Mission Canyon area	South Coast
Goleta Sanitary District	Eastern Goleta Valley and District boundaries: unincorporated urban areas of Goleta Valley immediately west of and adjacent to the City of Santa Barbara Larger Service Area: the Goleta West Sanitary District, University of California at Santa Barbara, Santa Barbara Municipal Airport, and certain Santa Barbara County facilities	South Coast
Goleta West Sanitary District1	Western portion of Goleta Valley, Isla Vista, and Embarcadero Municipal Improvement District	South Coast
Montecito CSD	Unincorporated community of Montecito	South Coast
Summerland Sanitary District	Unincorporated community of Summerland	South Coast

Notes:

[1] Provides only wastewater collection services.

[2] The Laguna County Sanitation District and the City of Santa Maria have a long-standing agreement, renewed in 2017, to provide treatment services to small areas of each other's territories. The service territories are adjacent to each other and because of pipe sizing and proximity to treatment facilities, this arrangement is cost-effective for both parties. This agreement does not include expanding service to new developments.

[3] The Los Olivos CSD was formed in 2018 and is in the process of studying and developing a community-wide wastewater treatment system for sewage, wastewater, recycled water, and stormwater. Currently, no municipal wastewater treatment services are provided in this community and all wastewater is managed by onsite wastewater treatment systems (OWTS). No specific details regarding the ultimate timing for the construction or operation of the wastewater system are available. However, the district is currently aiming for final approval of the design of the system by 2025 (G. Savage, Manager, Los Olivos CSD, personal communication, August 31, 2023).

Source: County of Santa Barbara 2019.

In addition to the wastewater collection and conveyance systems, there are 14 WWTPs throughout the county that collect and treat municipal wastewater. These WWTPs are operated by wastewater management agencies and sanitation districts (Table 3.15-6). Of the treatment plants that serve the unincorporated areas of the county, each is operating well within its permitted capacity, and the system currently operates at an average of 56.7 percent of the permitted treatment capacity (in million gallons per day [MGD]) of all facilities.

Table 3.15-6. Wastewater Treatment/Reclamation Facilities Servicing Unincorporated Areas of Santa Barbara County

Treatment/ Reclamation Facility	Serviced Sanitation Districts	Permitted Capacity (MGD)	Average Daily Throughput (MGD)	Remaining Capacity (MGD)
Carpinteria Sanitary District WWTP	Carpinteria Sanitary District	2.5	1.1	1.4
Cuyama CSD WWTP	Cuyama CSD	0.15	0.03	0.12
City of Santa Barbara WWTP	City of Santa Barbara	11.0	6.0	5.0
	CSA 12			
Goleta Sanitary District WWTP	Goleta Sanitary District	7.64	5.18	2.46
	Goleta West Sanitation District			
Laguna County Sanitary District WWTP[1]	Laguna County Sanitation District	2.7	1.7	1.0
Lompoc Regional Wastewater Reclamation Plant	City of Lompoc	0.89	0.45	0.44
	Vandenberg Village CSD			
Los Alamos WWTP	Los Alamos CSD	0.20	0.125	0.075
Mission Hills CSD (La Purisima WWTP)	Mission Hills CSD	0.40	0.20	0.20
Montecito Sanitary District WWTP	Montecito CSD	1.5	0.64	0.86
Solvang WWTP	Santa Ynez CSD	0.3	0.14	0.16
	City of Solvang			
Summerland Sanitary District WWTP	Summerland Sanitary District	0.3	0.072	0.228
Total	**--**	**27.58**	**15.64**	**11.94**

Notes:

[1] Laguna County Sanitary District's only method of discharge is through recycled water distribution for agricultural, landscaping, and industrial purposes. The treatment capacity is 3.7 MGD, but the discharge capacity is currently only 2.7 MGD. Therefore, the actual permitted treatment capacity for the WWTP is 2.7 MGD. To increase overall capacity, additional discharge connections are needed.

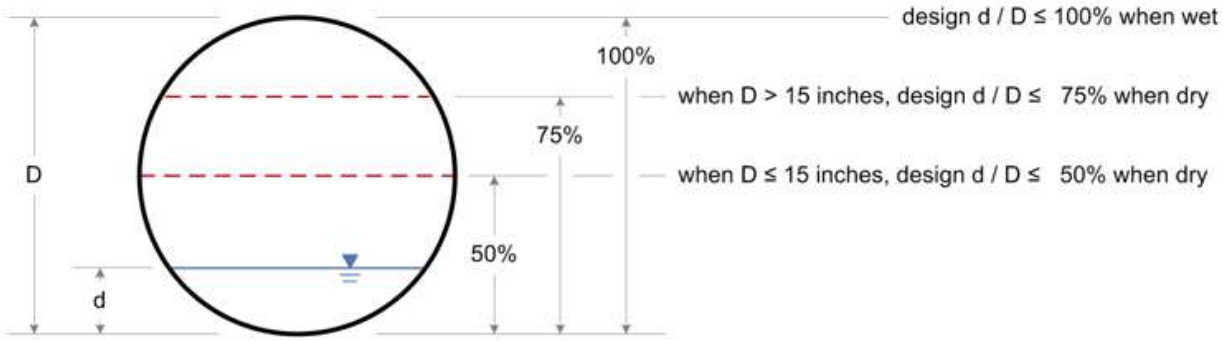
Sources: Dudek 2019; Carpinteria Sanitary District 2022; City of Santa Maria Utilities Department, n.d.; Provost and Pritchard Consulting Group 2021; City of Santa Barbara Water Resources Division and WSC 2021; Goleta West Sanitary District 2019; City of Guadalupe 2022; City of Lompoc and WSC 2021; Los Alamos Community Services District 2022; Montecito Water District and Tully and Young 2021.

Wastewater Conveyance

Wastewater collection systems in the county comprise underground pipelines that collect wastewater from homes and businesses and transport it typically via gravity flow to the WWTP servicing the community. Each existing home and business, apart from those served by onsite wastewater treatment systems (OWTS) , has a connecting sewer pipe called a lateral. Lateral sewers connect with larger sewers called trunk or main sewers. Pipes within the collection system range in size from 4 inches to 36 inches or more in diameter and can be buried to depths of approximately 25 feet. Where gravity is insufficient to convey wastewater effectively or where conveyance must traverse slopes, pumps or lifts are used to move wastewater through the system.

Sewers in the county are often designed to flow under gravity flow conditions with some reserve capacity. Flow depth is a key performance indicator. The flow depth-to-diameter ratio is a metric for sewer design and is defined as follows: Flow Depth-to-Diameter Ratio = d/D, where d = flow depth (inches) and D = sewer diameter (inches) (Figure 3.15-1).

Figure 3.15-1. d/D Ratio as Related to Sewer Design and Sizing



Source: ADS Environmental Services 2016.

This ratio indicates the capacity of a sewer line to convey wastewater adequately and avoid problems (i.e., backups or overflows) during dry and wet weather. For example, the American Society of Civil Engineers (ASCE) and the Water Environment Federation (WEF) recommend that sewers with diameters up to 15 inches be designed to flow with dry weather d/D ratios no more than 50 percent (i.e., 0.5 d/D), and larger diameter sewers be designed to flow with dry weather d/D ratios no more than 75 percent (i.e., 0.75 d/D). Sewers are not generally designed to operate under surcharge conditions (i.e., maximum capacity). Therefore, it is recommended that wet weather d/D ratios should not exceed 100 percent (ADS Environmental Services 2016).

Wastewater Treatment

Wastewater treatment facilities in the county are permitted under NPDES; therefore, the purification techniques and technologies used by WWTPs are designed to achieve mandated levels of cleanliness before release to the natural environment. In the county, WWTP outfalls are typically water bodies, including the Pacific Ocean and other waterways, such as the Goleta Slough in the South Coast and the Santa Ynez River in North County. Exceptions include Laguna County Sanitation District and Los Alamos CSD which dispose of effluent through irrigation. While each WWTP is designed and operated differently, the stages of treatment typically include the following:

- **Preliminary Treatment** removes larger inorganic objects, including plastics, wood, and metal, and allows small heavy materials such as coffee grounds, eggshells, and rocks to drop out and be removed and transported to a landfill.
- **Primary Treatment** uses gravity to remove a majority of organic solids from the wastewater, where solid "sludge" that settles to the bottom or "scum" that floats to the top is collected and removed from the water.
- **Secondary and Tertiary Treatment** uses filters to remove organic material using microorganisms to break down and filter out contaminants. This secondary and/or tertiary treated water also is disinfected (typically with chlorine) before disposal.

Onsite Wastewater Treatment Systems

In unincorporated rural lands that are not served by municipalities or special districts, wastewater is typically treated through private OWTSs (e.g., septic leach fields, and dry wells). Based on a survey undertaken by the County in 2000, there are an estimated 8,749 properties in unincorporated areas served by septic systems (Questa Engineering Corporation 2003). These systems are designed and managed under a variety of regulatory requirements. In June 2012, the SWRCB adopted the Water Quality Control Policy for Siting, Design, Operation and Maintenance of OWTSs. The Policy went into effect in May 2013 and established a statewide, risk-based tiered approach for the regulation and management of OWTSs. In compliance with these regulations, the County developed the 2014 Local Agency Management Program (LAMP), which sets standards and regulatory requirements for wastewater management.

3.15.2.3 Solid Waste

The RRWMD is responsible for the operation and administration of solid waste diversion and disposal in the unincorporated areas of the county. Solid waste generally refers to garbage, refuse, sludge, and other discarded solid materials that come from residential, industrial, and commercial activities. Construction, demolition, and inert wastes are also classified as solid waste. The general waste classifications used for California waste management units, facilities, and disposal sites are Nonhazardous Wastes, Hazardous Wastes, Liquid Wastes, Asbestos Containing Waste, Designated Wastes, and Special Wastes (California Department of Resource Recycling and Recovery [CalRecycle] 2022b). Residential and commercial waste collection services are provided to the unincorporated county areas by Waste Management (North County) and MarBorg Industries (South Coast).

The Tajiguas Landfill is the only active landfill that the County owns and operates. The Tajiguas Landfill is a Class III non-hazardous solid waste disposal facility located approximately 13 miles west of the City of Goleta. Solid waste is hauled to the landfill by authorized franchise waste haulers and private companies directly contracted with the County. The landfill receives solid waste from the South Coast, Santa Ynez Valley, and Cuyama Valley regions (RRWMD 2021b). It has a maximum permitted capacity of 23.3 million cubic yards (cy) and a permitted maximum throughput of 1,500 tons per day (tpd). As of April 2022, this landfill had an estimated remaining capacity of 1,680,900 cy (7.2 percent), and the estimated landfill closure year identified in the landfill's solid waste facility permit is March 2026 (Table 3.15-7) (CalRecycle 2019g). However, plans for increasing the capacity of the landfill have been in the works for years, and in September 2023 a Draft Subsequent Environmental Impact Report (EIR) was published for the Tajiguas Landfill Capacity Increase Project. Completion of this project is estimated to occur in Fall 2025 and would increase the capacity of the

landfill by approximately 6.1 million cy, extending the anticipated closure date to December 2038 (RRWMD 2023b).

The Santa Maria Regional Landfill is owned and operated by the City of Santa Maria and is a Class III non-hazardous solid waste disposal facility located approximately 2.8 miles east of the City of Santa Maria. It has a maximum permitted capacity of 13.9 million cy and a permitted maximum throughput of 6,006 tpd. As of April 2021, the landfill had an estimated remaining capacity of 1.5 million cy (10.5 percent), and the estimated landfill closure year identified in the landfill's solid waste facility permit is 2028 (Table 3.15-7) (CalRecycle 2023b). Solid waste is hauled to the landfill by authorized franchise waste haulers and private companies directly contracted with the City of Santa Maria. The landfill is open to the public. The landfill receives solid waste collected from urban and rural communities in the Santa Maria Valley region (RRWMD 2021b).

To help address the capacity issues of the Santa Maria Regional Landfill, in 2010 the City of Santa Maria approved the construction of the new Los Flores Integrated Waste Management Facility, a new 255-acre Class III non-hazardous solid waste facility to be located on a 1,774-acre site approximately 2.8 miles southeast of the community of Orcutt and 7 miles south of the Santa Maria Regional Landfill. The new Los Flores Integrated Waste Management Facility is to be designed with a 90-year capacity. However, the development and finalization of plans for the construction of the new landfill have been delayed, and completion of the landfill is not anticipated until 2024 or 2025 (City of Santa Maria 2021).

The Lompoc Sanitary Landfill is owned and operated by the City of Lompoc and is a Class III non-hazardous solid waste disposal facility located southwest of the City of Lompoc. It has a maximum permitted capacity of 7.97 million cy and a permitted maximum throughput of 400 tpd. The most recent estimate of the landfill's estimated remaining capacity is from January 2006, which estimated the landfill had a remaining capacity of 2.14 million cy (26.9 percent), and a closure year of 2045 (Table 3.15-7) (CalRecycle 2023a). Solid waste is hauled to the landfill by authorized franchise waste haulers and private companies directly contracted with the City of Lompoc. The landfill is open to the public. The landfill receives solid waste collected from urban and rural communities in the Lompoc Valley region (RRWMD 2021b).

Within the other unincorporated regions of the county, municipal waste is hauled to the South Coast Recycling & Transfer Station (SCRTS), Santa Ynez Valley Recycling & Transfer Station (SYVRTS), New Cuyama Transfer Station (NCTS), or Ventucopa Transfer Station (VTS), which are owned by the County and managed by the RRWMD for processing, sorting, and diversion before being disposed at regional landfills (Table 3.15-7).

The County also manages a household hazardous waste collection program (ABOP Program) operated out of the SYVRTS and jointly manages the Community Hazardous Waste Collection Center with the University of California, Santa Barbara (UCSB) (RRWMD 2022b).

Table 3.15-7. Solid Waste Facilities Serving Santa Barbara County

Waste Facility	Permitted Capacity	Permitted Throughput	Remaining Capacity (% of capacity)	Remaining Life (years)	2021-2022 Average Daily Processing/ Disposal (tpd)
South Coast Recycling & Transfer Station (SCRTS)	595 tpd	550 tpd	295.4 tpd (53.71%)	--	254.6
Santa Ynez Valley Recycling & Transfer Station (SYVRTS)	320 tpd	212 tpd	125.7 tpd (59.3%)	--	86.3
New Cuyama Transfer Station (NCTS)	302 cy	8 tpd	4.6 tpd (57.5%)	--	3.4
Ventucopa Transfer Station (VTS)	89 cy	5 tpd		--	
Tajiguas Landfill[1]	23,300,000 cy	1,500 tpd	1,680,900 cy (7.2%)	3 (closure in 2026)	529.7
Lompoc Landfill	7,970,000 cy	400 tpd	2,146,779 cy (26.9%)	22 (closure in 2045)	115
Santa Maria Regional Landfill	13,998,400 cy	6,006 tpd	1,477,580 cy (10.5%)	5 (closure in 2028)	418
Los Flores Integrated Regional Waste Management Facility (Planned)	130,850,000 cy	1,600 tpd	130,850,000 cy (100.0%)	--	N/A

Notes:

[1] Completion of the Tajiguas Landfill Capacity Increase Project, as described above, would add 6.1 million cy of capacity to the landfill and extend its closure date to 2038.

Sources: CalRecycle 2019f; 2019e; 2019h; 2019c; 2019d; 2019g; Santa Barbara County RRWMD 2022a; CalRecycle 2019b; S. Clark, City of Lompoc Solid Waste Compliance Coordinator, personal communication, November 1, 2023; H. Cantu, City of Santa Maria Solid Waste Manager, personal communication, November 2, 2023.

Waste Reduction Programs

The RRWMD also runs several waste reduction programs throughout the county, ranging from residential and special recycling programs (e.g., Electronics Recycling Program, Christmas Tree Recycling Program) to Household Hazardous Waste Disposal and various composting and green waste programs (RRWMD 2023a). These programs have had significant success in diverting various types of waste from landfills; the County's overall diversion rate is approximately 69 percent. Examples of this success include the Tajiguas Landfill and the Resource Center, which received 39,383 tons of green waste and 11,257 tons of recyclables, respectively, from 2021-2022 (RRWMD 2022a). Diversion from landfills is accomplished by a variety of different entities; Waste Management and MarBorg Industries maintain programs that streamline the collection of sharps, household batteries, and bulky items. In addition to the efforts of these private haulers, other diversion activities include landscapers diverting green waste, private facilities processing construction and demolition material, and several programs, including those operated by the County, which recover electronics, appliances, and hazardous waste.

In addition to these programs and diversion efforts, the County complies with California's Green Building Code (CalGreen), which requires a minimum of 65 percent of all construction waste to be recycled. To comply with these requirements, all development projects in the county must include a Solid Waste Management Plan (SWMP). In addition, companies that haul construction waste material are required to have a permit to operate in the county's unincorporated areas and as a condition of this permit, must recycle the majority of any material that they collect (including construction waste) when feasible (RRWMD 2022a).

3.15.3 Regulatory Setting

3.15.3.1 Federal

Federal Water Pollution Control Act of 1948 / Clean Water Act

The Federal Water Pollution Control Act, which was expanded in 1972 and is now commonly known as the Clean Water Act (CWA), is a comprehensive statute aimed at restoring and maintaining the chemical, physical, and biological integrity of the nation's waters, including discharge waters of wastewater treatment processes. The CWA, in combination with other federal environmental laws, regulates the location, type, planning, and funding of wastewater treatment facilities.

National Pollutant Discharge Elimination System

As authorized by the CWA, NPDES regulates point sources that discharge pollutants into waters of the U.S. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. The NPDES permit system is authorized and implemented by states and local water boards.

Surface Water Treatment Rules

The purpose of the SWTRs is to reduce illnesses caused by pathogens in drinking water. The disease-causing pathogens include *Legionella*, *Giardia lamblia, and Cryptosporidium*. The SWTRs require water systems to filter and disinfect surface water sources. Some water systems are allowed to use disinfection only for surface water sources that meet criteria for water quality and watershed protection.

The SWTRs apply to all public water systems using surface water sources or groundwater sources under the direct influence of surface water, require most water systems to filter and disinfect water, establish maximum contaminant level goals for a range of contaminants, and include treatment technique requirements for filtered and unfiltered systems to protect against adverse health effects of exposure to pathogens.

Drinking Water Rules and the Safe Drinking Water Act

The U.S. Environmental Protection Agency (USEPA) sets legal limits on over 90 contaminants in drinking water. The legal limit for a contaminant reflects the level that protects human health and that water systems can achieve using the best available technology. USEPA rules also set water-testing

schedules and methods that water systems must follow. The Safe Drinking Water Act (SDWA) allows individual states to set and enforce their own drinking water standards if the standards are at a minimum as stringent as the USEPA's national standards.

3.15.3.2 State

State Water Resources Control Board Order No. 2006-0003

The SWRCB General Waste Discharge Requirement for Sanitary Sewer Systems (SWRCB Order No. 2006-0003) requires wastewater agencies to evaluate and rehabilitate sewer systems, with a target of zero sewer overflows.

California Fire Code

The 2019 CFC is one of 12 parts of an official compilation referred to as the California Building Standards Code. The purpose of the CFC is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC includes standards for water supply and pressure to adequately support firefighting capabilities, including appendix standards for automatic fire sprinkler systems that reduce water demands to a building for firefighting by up to 75 percent with a minimum required fire flow of 1,500 gallons per minute (GPM). The latest CFC is based on the 2018 International Fire Code and was published by the California Building Standards Commission in 2019.

California Plumbing Code

The California Plumbing Code is Part 5 of 13 parts of the official compilation and publication of the adoption, amendment, and repeal of plumbing regulations to the California Code of Regulations, Title 24, also referred to as the California Building Standards Code. This code incorporates by adoption of the 2021 Uniform Plumbing Code of the International Association of Plumbing and Mechanical Officials with necessary California amendments. The purpose of the code is to establish the minimum requirements to safeguard public health, safety, and general welfare through structural strength, means of egress facilities, stability, access to persons with disabilities, sanitation, adequate lighting and ventilation, and energy conservation; safety to life and property from fire and other hazards attributed to the built environment; and to provide safety to firefighters and emergency responders during emergency operations.

California Water Plan Update 2018

The California Water Plan (California Water Code Section 10005[a]) provides a collaborative framework for water managers, legislators, and the public to consider options and make decisions regarding the state's water future. The plan is updated every five years and outlines actions that bring reliability, restoration, and resilience to California's water resources. The plan reinforces the value of integrated water management and examines policies that allow water managers to combine flood management, environmental stewardship, and surface water and groundwater supply. The California Water Plan Update 2018 was released for public review on December 21, 2018, and the final plan was released in June 2019. As of August 2023, DWR is in the process of preparing the California Water Plan Update 2023 and anticipates the release of the final plan in late 2023.

Sustainable Groundwater Management Act of 2014

California enacted landmark legislation in 2014 known as the Sustainable Groundwater Management Act (SGMA), which is composed of Assembly Bill (AB) 1739, Senate Bill (SB) 1168, and SB 1319. The legislation provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for state intervention only if necessary to protect the resource. SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts and bring groundwater basins into balanced levels of pumping and recharge. Basins must reach sustainability within 20 years of implementing the sustainability plans. SGMA requires the formation of local groundwater sustainability agencies that must assess conditions in their local water basins and adopt locally based management plans. Additional information regarding SGMA, the status of local groundwater basins, and locally adopted Groundwater Sustainability Plans is provided in Section 3.9, *Hydrology and Water Quality.*

California Urban Water Management Planning Act (UWMPA)

The UWMPA (California Water Code Division 6, Part 2.6, Sections 10610 et seq.) was developed to address concerns over potential water supply shortages throughout California. The UWMPA requires the collection and reporting of information on water supply reliability and water use efficiency measures. As part of the UWMPA, municipal water suppliers that serve over 3,000 customers or provide more than 3,000 AFY are required to develop and implement UWMPs to describe water supply, service area demand, population trends, and efforts to promote efficient use and management of water resources. A UWMP is intended to serve as a water supply and demand planning document that is updated every five years to reflect changes in the water supplier's service area, including water supply trends as well as conservation and water use efficiency policies.

Senate Bill 610 and SB 221

SB 610 and SB 221 became effective January 1, 2002. SB 610, codified in California Water Code Division 6, Part 2.6, Sections 10910 et seq., describes requirements for water supply assessments (WSAs) and UWMPs applicable to the CEQA process. SB 610 requires that water suppliers must prepare a WSA for projects that are subject to CEQA and exceed a specified minimum size to determine whether the projected water demand associated with the project is included as part of the most recently adopted UWMP. The size requirement is specified according to development type but generally includes developments with water consumption that would be equivalent to or greater than the amount of water required by a 500-dwelling unit project. SB 610 requirements may be satisfied by a water supply analysis provided in an EIR.

Water Conservation Act (2009)

The Water Conservation Act mandates new water conservation goals for UWMPs, requiring urban water suppliers to achieve a 20 percent per capita water consumption reduction statewide by 2020, as described in the 20 x 2020 State Water Conservation Plan. UWMP updates must incorporate a description of how the water supplier will achieve this reduction, in addition to SB 610 requirements.

Urban water retailers can achieve the Act's water reduction goals using one of four specified methods:

- Option 1: 80 percent of baseline use (reduction of 20 percent)
- Option 2: Sum of specified performance standards

- Option 3: 95 percent of the DWR Hydrologic Region target from the draft 20 x 2020 State Water Conservation Plan
- Option 4: A flexible alternative designed to adjust to local circumstances

Urban retail water suppliers must monitor and report compliance on an individual or regional basis. Individual urban retail water suppliers are not required to achieve a reduction in urban per capita water use greater than 20 percent. Compliance with the water reduction target is required for continued state water grants and loan eligibility. After 2021, the failure of urban retail water suppliers to meet their targets establishes a violation of law for administrative or judicial proceedings.

State Assembly Bill 939, California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939; Public Resources Code Section 40000 et seq.) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (Board) and local agencies in implementation, in order of priority: 1) source reduction; 2) recycling and composting; and 3) environmentally-safe transformation and land disposal. The Act required each county to establish a task force to coordinate the development of city source reduction and recycling elements and a countywide siting element. The Act also required each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan.

Additionally, waste diversion mandates were set in AB 939. The law required each city or county plan to include an implementation schedule that shows the diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995, through source reduction, recycling, and composting activities; and the diversion of 50 percent of all solid waste by January 1, 2000, through source reduction, recycling, and composting activities. A city or county may be deemed exempt from these goals or reduce the requirements if the city or county demonstrates that attainment of the goals is not feasible due to the small geographic size of the area and the small quantity of waste generated. After January 1, 1995, the Act authorized the Board to establish an alternative goal to the 50 percent requirement, if the Board finds that the local agency is effectively implementing all source reduction, recycling, and composting measures to the maximum extent feasible.

Senate Bill 1016

SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing the measurement of waste reduction from a diversion rate to a disposal-based indicator – the per capita disposal rate. The purpose of the per capita disposal measurement system is to make the process of goal measurement as established by AB 939 simpler, timelier, and more accurate. Beginning with the reporting year 2007 jurisdiction annual reports, diversion rates will no longer be measured. With the passage of SB 1016, only per capita disposal rates are measured. For 2007 and subsequent years, CalRecycle compares reported disposal tons to population to calculate per capita disposal expressed in pounds/person/day.

Short-Lived Climate Pollutants Bill of 2016 (Senate Bill 1383)

SB 1383 requires the California Air Resources Board (CARB) to approve and begin implementing a comprehensive strategy no later than January 1, 2018, to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent,

and anthropogenic black carbon by 50 percent below 2013 levels by 2030. It also establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle, in consultation with CARB, is responsible for the implementation of regulations to achieve these targets. SB 1383 authorizes local jurisdictions to charge and collect fees to recover the local jurisdiction's costs incurred in complying with the regulations. It also requires CalRecycle, in consultation with CARB, to analyze the progress that the waste sector, state government, and local governments have made in achieving the specified targets for reducing organic waste in landfills no later than July 1, 2020. Depending on the outcome of that analysis, CalRecycle is authorized to amend the regulations to include incentives or additional requirements.

State Assembly Bill (AB) 341

AB 341 established a state policy goal that no less than 75 percent of solid waste generated be source-reduced, recycled, or composted by 2020. Additionally, this law required CalRecycle to provide a report to the California Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 builds on the existing AB 939 requirement that every jurisdiction divert at least 50 percent of its waste. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012. AB 341 requires any business (including schools and government facilities) that generates four cubic yards or more of waste per week, and multifamily buildings with five or more units, to arrange for recycling services. Additionally, the bill requires education and outreach programs to be implemented to inform generators covered by the bill of their obligation to meet the terms of the regulation. To measure efforts made to comply with this policy, CalRecycle requires an annual report that details the commercial recycling program, including education, outreach, and monitoring.

California Green Building Standards Code

The California Green Building Standards Code – Part 11, Title 24, California Code of Regulations—known as CalGreen, is the first-in-the-nation mandatory green building standards code. In 2007, the California Building Standards Commission developed green building standards to meet the goals of California's landmark initiative AB 32, which established a comprehensive program of cost-effective reductions of greenhouse gases to 1990 levels by 2020. CBSC has the authority to propose CALGreen standards for residential and nonresidential structures that include new buildings or portions of new buildings, additions, alterations, and all occupancies where no other state agency has the authority to adopt green building standards applicable to those occupancies. Section 4.408.1, *Construction Waste Management*, requires that a minimum of 65 percent of the nonhazardous construction and demolition waste be recycled and/or salvaged, in accordance with either Section 4.408.2 (Construction Waste Management Plan), 4.408.3 (Waste Management Company), or 4.408.4 (Waste Stream Reduction Alternative), or meet a more stringent local construction and demolition waste management ordinance.

Public Resources Code Division 30, Part 2, Chapter 4, Section 41701

The Division and Chapter of the Public Resources Code requires all jurisdictions in the state to plan and manage disposal capacity for waste that cannot be reduced, recycled, or composted.

Local Agency Management Programs

The California Water Quality Control Policy for Siting, Design, Operation, and Maintenance of On-Site Wastewater Treatment Systems went into effect in May 2013, requiring counties to adopt their own LAMP by 2016 or to default to the policy's restrictions. The Central Coast RWQCB approved Santa Barbara County's LAMP, developed by Environmental Health Services with local stakeholders, on November 20, 2015, and it became fully effective on January 1, 2016. The LAMP outlines a customized management program to regulate septic systems within the County's jurisdiction and requires the County to develop management plans for water bodies degraded by the use of OWTS. The goal of the LAMP is to protect surface water bodies and groundwater from negative impacts caused by the operation of OWTS.

3.13.3.2 Local

Santa Barbara County Comprehensive Plan

Land Use Element

The Land Use Element lays out the general patterns of development throughout the county, including the distribution of real estate, open space and agricultural land, mineral resources, recreational facilities, schools, utilities, and waste facilities. The following policies relate to the proposed Project:

- **Land Use Development Policy 4**: Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.
- **Land Use Development Policy 5**: Within designated urban areas, new development other than that for agricultural purposes shall be serviced by the appropriate public sewer and water district or an existing mutual water company if such service is available.

Conservation Element

The Conservation Element of the County's Comprehensive Plan includes a Water Resources Section, which provides direction for the conservation, development, and utilization of water resources in Santa Barbara County. As part of this effort, the County is directed to consider water resources during the permitting process. The Conservation Element provides the following recommendations:

- The County and the cities should support the Regional Water Quality Control Board in its establishment of discharge requirements for point source waste discharges, to protect surface and groundwater supplies.
- The use of streams from which groundwater recharge takes place should be regulated to ensure that the recharge capability of the channels is not impaired.

- Land use and development upstream from surface reservoirs should be regulated and monitored by the County Department of Public Works and the County Planning & Development Department (P&D) Department to minimize the production of water-polluting wastes.
- The County should initiate a study of land development in areas relying on septic tanks to assess the impact of alternate densities on water quality.
- Based on the adopted Water Quality Control Plan for the Central Coastal Region, the County and the cities should review their policies for the protection of local water resources to determine what changes may be necessary.

Energy Element

The Energy Element of the County's Comprehensive Plan contains long-range planning guidelines and strategies to encourage energy efficiency and alternative energy sources in Santa Barbara County. Of particular relevance to the Project is Goal 4, which aims to increase the efficiency of water and resource use to reduce energy consumption associated with various phases of using resources (pumping, distribution, treatment, heating, etc.). The following policies in support of Goal 4 relate to the Project.

- **Policy 4.1: Construction.** Encourage recycling and reuse of construction waste to reduce energy consumption associated with extracting and manufacturing virgin materials.
- **Policy 4.2: Recycled Materials.** The County shall require adequate areas for collecting and loading recyclable materials in development projects, and shall further address recycling logistics in its zoning ordinance.
- **Policy 4.3: Reuse of Asphalt.** Promote reuse of asphalt removed from roads and paved structures within the county and use of recycled materials in roadway and paved surface construction.
- **Policy 4.4: Procurement of Recycled Products.** The County shall procure products made from recycled materials to the maximum extent feasible, and as budget constraints allow.
- **Policy 4.5: Waste Collection and Recycling Programs.** The County shall continue to support the programs associated with efficient waste collection and recycling, public school education, and composting.
- **Policy 4.6: Water/Energy-Efficient Irrigation – Agriculture.** The County shall continue to support the programs of the Soil Conservation Service, Resource Conservation District, U.C. Cooperative Extension/Farm Advisor, utility companies, and others that address efficient irrigation because of their associated energy benefits.
- **Policy 4.7: Interior Water-Efficient Plumbing Fixtures.** The County shall encourage water purveyors and water customers to continue their efforts to install more efficient options to increase energy benefits associated with reduced pumping, distribution, heating and treatment of water and wastewater.
- **Policy 4.8: Water Efficient Landscaping.** The County shall require (per Government Code, Section 65590, Article 10.8) water-efficient landscape design and irrigation systems in new and renovated developments and at public parks and facilities. [Energy-savings are accrued through reduced water pumping and treatment, and reduced disposal and maintenance.]

Coastal Land Use Plan

The Santa Barbara County Comprehensive Plan, Coastal Land Use Plan (CLUP) establishes goals, policies, and objectives adopted by the County to ensure the adequate protection and provision of public facilities and resources. The goals and policies applicable to this Project are listed below:

- **Policy 2-6:** Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (e.g., water, sewer, roads) are available to serve the proposed development.

Community Plans

Community-specific goals and policies for utilities and water supply resources are provided in several adopted community plans as part of the Comprehensive Plan. Any future housing and associated development within the following community plan areas would be subject to the public utilities, infrastructure, and water supply and conservation goals and policies of that plan.

- Eastern Goleta Valley Community Plan
- Gaviota Coast Plan
- Goleta Community Plan
- Los Alamos Community Plan
- Mission Canyon Plan
- Montecito Community Plan
- Orcutt Community Plan
- Santa Ynez Community Plan
- Summerland Community Plan
- Toro Canyon Plan

Santa Barbara County Land Use Development Code (LUDC)

35.30.100 - Infrastructure, Services, Utilities and Related Facilities

A. Adequacy of infrastructure required. Issuance of a Land Use Permit (Section 35.82.110) or Zoning Clearance (Section 35.82.210) shall require that the review authority first find, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (e.g., water, sewer, roads) are available to serve a proposed development.

B. Applicant responsibilities. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of a project or reduction in the density otherwise indicated in the Comprehensive Plan or zoning maps.

C. General requirement for water and sewer services. Within Urban areas designated on the Comprehensive Plan maps, new development other than that for agricultural purposes shall be served

by the appropriate public sewer and water district or an existing mutual water company, if such service is available.

35.30.170 - Solid Waste and Recycling Storage Facilities

A. Purpose. This Section provides standards which recognize County support for and compliance with the California Solid Waste Reuse and Recycling Access Act (Public Resources Code Section 42900 through 42911).

B. Applicability. These requirements apply to the following projects:

2. Residential building. Any new residential building having five or more dwelling units or any changes to such an existing residential building which requires a building permit.

3. Residential development. Any new residential project where solid waste is collected and loaded in a location serving five or more dwelling units, or any changes to an existing residential project which requires a building permit.

4. One-family subdivision. Any subdivision of one-family detached dwellings if, within such subdivisions there is an area where solid waste is collected and loaded in a location which serves five or more dwelling units. In such instances, recycling areas as specified in this Section are only required to serve the needs of the dwelling units which utilize the solid waste collection and loading area.

C. Standards for storage areas. All projects identified in Subsection B (Applicability) above shall be required to provide solid waste areas specifically identified for the storage of both trash and recycling containers in compliance with the following.

1. Functional use. Solid waste enclosures shall be properly located, exterior of living space, for functional use by occupants and by the disposal and hauling companies providing collection services.

2. Size and location. The exact size and location of the solid waste and recycling facilities storage areas shall be determined by the review authority on a case-by-case basis taking into account types and quantities of recyclable materials to be generated by the proposed land use and by the mode of collection.

3. Screening requirements. Solid waste enclosures shall be constructed to be as inconspicuous as possible and, in accordance with Santa Barbara County Code Chapter 17, the contents of enclosures shall be screened from public view.

D. Solid Waste Management Plan. A Solid Waste Management Plan shall be developed by the permittee as directed by the County Solid Waste Management Plan Guidelines and may require review and approval by the County Public Works Department prior to the issuance of building permits by the Department.

Article II Coastal Zoning Ordinance

Pursuant to PRC Section 30500 of the California Coastal Act of 1976, the County has prepared a Local Coastal Program (LCP) for the unincorporated area of the county within the Coastal Zone. The County's LCP includes the Land Use Plan, zoning district maps applying to the Coastal Zone, and a zoning ordinance (which is the Article II CZO itself). The purposes of the Article II CZO are to protect, maintain, and, where feasible, enhance and restore the overall quality of the Coastal Zone; assure

orderly and balanced utilization of Coastal Zone resources; maximize public access to and along the coast, as well as public recreational opportunities; assure priority for coastal-dependent and coastal-related development over other development on the coast; and protect the character and stability (social and economic) of agricultural, residential, commercial, and industrial areas.

Santa Barbara County Integrated Regional Water Management Plan

The County of Santa Barbara's IRWMP was developed in response to the State of California's Integrated Regional Water Management (IRWM) program, and it shares the state's visions of IRWM as a collaborative effort to manage all aspects of water resources in a region. The County's IRWMP intends to promote and practice integrated regional water management strategies to ensure sustainable water uses, reliable water supplies, better water quality, environmental stewardship, efficient urban development, and protection of agricultural and watershed awareness. Although the IRWMP is not a regulatory document, nor does it provide specific policies to which development must adhere to, it identifies various programs, objectives, priorities, and implementation strategies that are recommended to encourage water conservation and is updated to respond to the changing needs and conditions in the region.

Santa Barbara County Water Agency Programs

The SBCWA was established by the state legislature in 1945 to contract with the U.S. for the Cachuma and Santa Maria Project. The SBCWA is a dependent special district that manages several regional programs throughout Santa Barbara County. The SBCWA jurisdictional boundaries are the same as the County's political boundaries. The SBCWA manages the following programs: implementation and partial funding of operational programs such as the cloud seeding program; implementation and administration of the Regional Water Efficiency Program; and collection of countywide hydrologic data and development of hydrologic models. Included in these programs are technical reports and studies such as periodic reports on groundwater conditions, sediment management studies, reservoir capacity studies, technical support to other public agencies, and public information. Major water projects involving the SBCWA include the SWP (Coastal Branch Extension), the Cachuma Project, and the Twitchell Project. SBCWA administers the development of the IRWMP, supported by several local governments.

Santa Barbara County Fire Code, Chapter 15 – Fire Prevention / Fire Code

Chapter 15 of the County's Code of Ordinances (Ord. No. 5170, 12-6-2022) is titled *Fire Prevention* and serves as the County's Fire Code. This ordinance incorporates the CFC by reference and, as a result, implements the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations.

This chapter of the County's Code of Ordinances includes development standards developed by the Santa Barbara County Fire Department (SBCFD) to provide for and maintain adequate and unobstructed emergency access for fire department apparatus and personnel to buildings, structures, hazardous occupancies, or other premises. The standards apply to newly proposed private roads and driveways that are used to provide access to dwellings and structures for emergency access. They include requirements for minimum roadway width, turnarounds, fire access, vegetation clearing around roadways to be used for firefighting access purposes and building and construction standards.

The standards also provide limitations for the maximum length of dead-end-roads allowable, defensible space requirements, and automatic sprinkler systems, among others. Multifamily development projects may have additional access requirements beyond what is included in this standard.

The County's Code of Ordinances also includes an impact mitigation fee for new development projects within the SBCFD service area. To mitigate impacts caused by new development projects within SBCFD's service area, a fire facility, apparatus, and equipment development impact mitigation fee may be necessary. The fee is needed to finance fire facilities, apparatus, and equipment necessary to serve new development and to assure new development projects pay their fair share for these facilities. These fees are outlined in the County's Development Impact Mitigation Fee Program and are required to be paid on or before the final building permit inspection.

Santa Barbara County Code, Chapter 17 – Solid Waste Systems

Chapter 17 of the County Code of Ordinances addresses solid waste systems. Section 17-23, *Construction and Demolition Waste*, states that the County specifically requires construction and demolition waste to be recycled to the minimum required by CalGreen Standards to assist the County in maintaining compliance with AB 939, the Integrated Waste Management Act, and to conform with adopted CalGreen Standards.

3.15.4 Environmental Impact Analysis

This section discusses the potential utility and water supply impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.15.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to utilities and water supply if it would:

a. Require or result in the relocation or construction of or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects;

b. Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or

e. Not comply with federal, state, and local statutes and regulations related to solid waste.

Impacts relating to electrical power and natural gas services and facilities are discussed in Section 3.6, *Energy.* Water quality standards and requirements--including discharge regulations--as well as stormwater drainage and facilities are addressed in Section 3.9, *Hydrology and Water Quality*. The proposed Project does not involve any uses that would result in the relocation or construction of or expanded telecommunications facilities. Therefore, impacts associated with telecommunication facilities are not discussed.

County of Santa Barbara Environmental Thresholds and Guidelines Manual

Water

The County's *Environmental Thresholds and Guidelines Manual* (2021) does not identify applicable thresholds related to municipal water supplies and infrastructure; therefore, the Program EIR relies upon the County's Initial Study Checklist. Under the Water Resources/Flooding section of the County's Initial Study Checklist, the County considers a project's impact on municipal water supplies and infrastructure potentially significant if it would result in:

- Substantial reduction in the amount of water otherwise available for public water supplies.

Wastewater

The County's *Environmental Thresholds and Guidelines Manual* (2021) does not identify applicable local thresholds related to wastewater services and infrastructure; therefore, for this analysis, the Program EIR relies upon the County's Initial Study Checklist. Under the Public Facilities section of the County's Initial Study Checklist, the County considers a project's impact on wastewater treatment facilities potentially significant if it would result in:

- The relocation or construction of new or expanded wastewater treatment facilities (sewer lines, lift stations, etc.) the construction or relocation of which could cause significant environmental effects.

Solid Waste

The County's *Environmental Thresholds and Guidelines Manual* (2021) includes the following thresholds for determining the significance of impacts from solid waste:

1. Construction and demolition. Construction and demolition waste accounts for 31 percent of all waste generated by residents of Santa Barbara County. In order to comply with AB 939 requiring a minimum of 50 percent of all waste to be diverted from landfills, the particular source of waste has been targeted.

   Any construction, demolition, or remodeling project of a commercial, industrial, or residential development that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on public services.

   Although amounts of waste generated vary project-to-project, the County has the following estimates of projects that will reach the threshold of significance:

   a. Remodeling projects over 7,000 square feet for residential projects and 17,500 square feet for commercial/industrial projects.

   b. Demolition projects over 11,600 square feet for residential buildings and 7,000 square feet for commercial/industrial buildings.

c. New construction projects over 47,000 square feet for residential buildings and 28,000 square feet for commercial/industrial buildings.

These estimates are based on the USEPA's 1998 construction and demolition study (Document: EPA530-R-98-010; June 1998) and data gathered by the San Luis Obispo Integrated Waste Management Authority in 2005 and 2006.

2. Operations/Occupancy. A project is considered to result in a significant impact to landfill capacity if it would generate five percent or more of the expected annual increase in waste generation thereby using a significant portion of the remaining landfill capacity. The numerical value associated with the five percent increase is 196 tons per year (tpy). Source reduction, recycling and composting can reduce a project's waste stream (generated during operations) by as much as 50 percent. If a proposed project generates 196 or more tpy after reduction and recycling efforts, impacts would be considered significant and unavoidable.

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus the 15 percent buffer for lower and moderate-income units. As a result, the impact analysis provided below does not evaluate utilities or water supply issues at a project- or site-specific level. This programmatic analysis reviews potential impacts anticipated to be enabled by the Housing Element Update and considers whether these changes would affect utilities and water supply within the county.

To support a reasonable worst-case analysis of potential impacts, this Program EIR evaluates the proposed Project as a whole and considers the maximum potential buildout capacity scenario of the sites inventory prepared for the Housing Element Update based on the existing or potential zoning of each site. As a result, the maximum potential buildout scenario estimates that substantially more housing could be developed under the proposed Project than estimated in the Housing Element Update's sites inventory. The maximum potential buildout scenario is a theoretical assessment of zoning capacity and does not modify or replace the Housing Element Update's assessment of realistic capacity provided in the sites inventory. In addition, wherever possible, illustrative examples are provided to describe particular areas of the county where the implementation of the Housing Element Update could exacerbate existing water supply or utility infrastructure issues.

This section evaluates the availability and level of existing water, wastewater, and solid waste facilities and water supply serving unincorporated areas of the county; reviews any planned improvements or changes to these facilities and supply; and analyzes the potential increases in demand for services (including conveyance, collection, disposal, and treatment) for water supplies, wastewater, and solid waste as a result of land use changes and projected new residential and commercial development enabled under the Housing Element Update. It then assesses the adequacy of existing and planned facilities and supplies to meet future demand to determine whether development enabled under the Housing Element Update would increase the demand for utilities such that there would be a need for new or physically altered facilities or whether new or expansion of facilities would be needed. This impact analysis also assesses whether development enabled under the Housing Element Update would result in the generation of solid waste that would impair the

attainment of solid waste reduction goals, or not comply with regulations and statutes related to solid waste (e.g., by creating more than 350 tons of construction and demolition debris).

This section utilizes data information from CalRecycle, data provided by and communications with various service providers and agencies responsible for the operation of existing facilities, recent UWMPs, the County's IRWMP, and information and data presented in the County's Draft 2023-2031 Housing Element Update, among other resources. Based on these resources, this analysis provides a planning-level assessment of the adequacy of existing infrastructures and water supplies to serve projected increases in demand associated with future land use and development enabled by the Housing Element Update. Additional discussion regarding the methodology and assumptions for assessing impacts on utilities and water supply is provided below.

Municipal Water Supply

As detailed in Chapter 3, *Environmental Impact Analysis*, the maximum Project buildout is based on the sites inventory prepared for the Housing Element Update and could result in up to 34,558 units of residential development within unincorporated areas of the county. Housing units would comprise the primary source of new water demands; the commercial uses within mixed use projects enabled by the Housing Element Update would primarily comprise retail and office uses, which have overall nominal municipal water demands. To determine the potential increase in water demand generated by the proposed Project, the potential maximum buildout is multiplied by relevant water demand factors published by the City of Santa Barbara (Waterman and Freed 2021), as follows:

- Single-Family Dwelling (SFD) = 0.71 AFY per dwelling unit (du)
- Multifamily Dwelling (MFD) = 0.15 AFY per du

The results of this analysis are presented by region in Table 3.15-8 below. Based on these demand factors, the proposed Project would increase water demand by up to 5,952.58 AFY countywide.

To determine whether the additional water demand generated by buildout under the proposed Project would present a potentially significant impact on existing water supplies, the projected demand is compared to the existing and/or future projected water demand and water availability under normal, dry, and multiple dry year conditions, where data is available. Additional detailed calculations of water demand generated under the proposed Project are presented in Appendix H.

Table 3.15-8. Estimated Maximum Potential Increase in Municipal Water Demand by Housing Market Area (HMA)

Housing Type by HMA	# of Units	Demand Factor (AFY/du)	Additional Demand (AFY)
South Coast			
SFDs	379	0.71	269.09
MFDs	17,663	0.15	2,630.85
Total	**18,042**	**--**	**2,899.94**
Lompoc Valley			
SFDs	126	0.71	89.46
MFDs	795	0.15	119.25
Total	**921**	**--**	**208.71**

Table 3.15-8. Estimated Maximum Potential Increase in Municipal Water Demand by Housing Market Area (HMA) (Continued)

Housing Type by HMA	# of Units	Demand Factor (AFY/du)	Additional Demand (AFY)
Santa Maria Valley			
SFDs	698	0.71	495.58
MFDs	12,142	0.15	1,821.3
Total	**12,840**	**--**	**2,316.88**
Santa Ynez Valley			
SFDs	170	0.71	120.70
MFDs	740	0.15	111.00
Total	**910**	**--**	**231.70**
Cuyama Valley			
SFDs	0	0.71	0
MFDs	1,845	0.15	276.75
Total	**1,845**	**--**	**276.75**
Total Unincorporated County			
SFDs	1,373	0.71	974.83
MFDs	33,185	0.15	4,977.75
Total	**34,558**	**--**	**5,952.58**

Source: Waterman and Freed 2021.

Wastewater Conveyance and Treatment

To estimate the additional wastewater generated by the proposed Project, this analysis conservatively assumes municipal water demand generated by new development would equate to wastewater generation. In other words, the analysis assumes that wastewater generation is the same as the calculated water demand above. As such, the Project is anticipated to generate an increase in 5,952.88 AFY, or 5.37 MGD, of wastewater flowing to municipal treatment systems. This additional wastewater generation is compared to the existing remaining capacity of wastewater conveyance and treatment systems serving unincorporated areas of the county to determine the potential impacts of the proposed Project.

Solid Waste Collection and Disposal

The potential increase in solid waste generation from the proposed Project is estimated using residential and commercial generation rates provided by CalRecycle (2015, 2019a). The results of this analysis are presented in Table 3.15-9. Based on these generation rates and the potential maximum buildout under the proposed Project, the proposed Project has the potential to increase the generation of 245.23 tons of municipal solid waste per day or an estimated 12,418.36 cy of municipal solid waste each year that would be disposed at regional landfills and waste processing facilities in the county.

Table 3.15-9. Estimated Project Solid Waste Generation

Sector	# of Units/square feet of Commercial	Generation Factor	Additional Demand (tpy)	Additional Demand (tpd)	Estimated cy/year[3,4]
South Coast					
Residential	18,042	2.23 tpy per du[1]	40,223.66	110.23	6,035.05
Commercial	14,374.8	2.41 tpy per 300 sf[2]	115.48	0.32	7.97
Total	**--**	**--**	**40,349.14**	**110.55**	**6,043.02**
Lompoc					
Residential	921	2.23 tpy per du[1]	2,053.83	5.63	308.07
Commercial	87,276.2	2.41 tpy per 300 sf[2]	701.12	1.92	48.38
Total			**2,754.95**	**7.55**	**356.45**
Santa Maria					
Residential	12,840	2.23 tpy per du[1]	28,663.20	78.45	4,294.98
Commercial	1,160,002.8	2.41 tpy per 300 sf[2]	9,318.69	25.53	642.99
Total			**37,951.89**	**103.98**	**4,937.97**
Santa Ynez					
Residential	910	2.23 tpy per du[1]	2,029.30	5.56	304.40
Commercial	79,497.0	2.41 tpy per 300 sf[2]	638.63	1.75	44.07
Total			**2,667.93**	**7.31**	**348.46**
Cuyama					
Residential	1,845	2.23 tpy per du[1]	4,114.35	11.27	617.15
Commercial	208,020.0	2.41 tpy per 300 sf[2]	1,671.09	4.58	115.31
Total			**5,785.44**	**15.85**	**732.46**
Total Unincorporated County					
Residential	34,558	2.23 tpy per du[1]	77,064.34	211.14	11,559.65
Commercial	1,549,170.8	2.41 tpy per 300 sf[2]	12,445.01	34.10	858.71
Total			**89,509.35**	**245.23**	**12,418.36**

Notes:
du = dwelling unit; sf = square feet
[1] Residential waste generation is based on a rate of 12.23 lbs/du/day, which was converted to 2.23 tons/du/year.
[2] Commercial waste generation is based on a rate of 2.41 tons/employee/year. Consistent with the analysis of vehicle miles traveled (VMT) impacts, this analysis assumes an average of one employee for every 300 sf of commercial development.
[3] Estimated cy of municipal solid waste generated by residential projects based on an assumed volume-to-weight conversion ratio of 300 lbs/cy, or 0.15 tons/cy.
[4] Estimated cy of municipal solid waste generated by commercial uses based on an assumed volume-to-weight conversion ratio of 138 lbs/cy, or 0.07 tons/cy.
Source: CalRecycle 2015, 2019a; USEPA 2016.

3.15.4.2 Project Impacts

Table 3.15-10 provides a summary of the proposed Project's impacts related to utilities and water supply. A detailed discussion of each impact follows.

Table 3.15-10. Summary of Utility Service and Water Supply Impacts

Utilities and Water Supply Impacts	Impact Classification	Mitigation Measure	Residual Significance
Impact UWS-1. The proposed Project would require or result in the construction, expansion, or replacement of utilities, including water and wastewater facilities, which could potentially result in significant environmental effects.	Potentially significant	All MMs identified in Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.8, *Hydrology and Water Quality,* and Section 3.11, *Noise*	Significant and unavoidable
Impact UWS-2. The proposed Project would result in an increased water demand that could exceed the capacity of water purveyors to serve future development during normal, dry, and multiple dry years.	Potentially significant	MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities)	Significant and unavoidable
Impact UWS-3. The proposed Project would result in increased wastewater generation, which may exceed the capacity of wastewater treatment providers in the county.	Potentially significant	MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities)	Significant and unavoidable
Impact UWS-4. The proposed Project would result in the generation of solid waste that could exceed relevant standards and/or the capacity of existing waste disposal facilities serving the county, as well as impair the attainment of solid waste reduction goals.	Potentially significant	MM UWS-2 (Source Reduction and Solid Waste Management Plan [SRSWMP])	Significant and unavoidable
Cumulative Impacts	Potentially significant	All MMs identified in Section 3.4, *Biological Resources*, Section 3.5, *Cultural and Tribal Resources*, Section 3.8, *Hydrology and Water Quality*, and Section 3.11, *Noise* MM UWS-1 (Infrastructure Services, Utilities, and Related Facilities) MM UWS-2 (SRSWMP)	Significant and unavoidable

Impact UWS-1. The proposed Project would require or result in the construction, expansion, or replacement of utilities, including water and wastewater facilities, which could potentially result in significant environmental effects.

The additional demand for services and supplies generated by the proposed Project could necessitate the construction or expansion of utilities, such as water and wastewater facilities, resulting in potentially significant environmental impacts. As described above in *Methodology* and summarized in Table 3.15-8 above, the proposed Project would generate an approximate additional 5,952.58 AFY of demand for municipal water supplies and 5.37 MGD in wastewater. The unincorporated county is served by a total of 12 different water service districts and 16 wastewater service providers/districts that provide domestic and municipal water and wastewater services to a wide range of unincorporated communities, ranging from larger urban areas, such as those in the South Coast, to smaller communities, such as Cuyama or Casmalia. The statuses of these districts vary, and some require infrastructure and facility upgrades given the current age and/or condition of service delivery, collection, and treatment systems, while others may have systems that could adequately serve the needs of the proposed Project, as discussed in Impacts UWS-2 and UWS-3 below. With the increase in water demand and wastewater generation at a given location, individual projects may trigger the need for the construction of new laterals and/or the replacement/expansion of existing mains, pumps, and lift stations necessary to provide adequate water supply, water pressure, and wastewater conveyance. For example, existing sewer mains and laterals may be undersized to serve new development where the d/D ratio does not allow for free-flowing conveyance, and new laterals or mains would need to be adequately sized to achieve d/D ratios that meet the sewer design standards for the respective district.

Recognizing that new housing projects must be adequately served by municipal water and wastewater services in the Urban Area and Rural Area, the Housing Element Update includes programs to protect, improve, and expand water and wastewater services for new housing projects. Specifically, Program 14, *Water and Sewer Services*, commits the County to support wastewater purveyors efforts to expand the capacity of their facilities and water purveyors to pursue various strategies to secure water to adequately serve housing development. This would include the expansion of water and wastewater service infrastructure to serve potential sites identified in the sites inventory.

However, it is foreseeable that the substantial increase in water demand and wastewater generation enabled under the proposed Project would necessitate, in some regions, the construction or expansion of new or existing facilities or infrastructure. For instance, as described further in Impacts UWS-2 and UWS-3 below, development under the proposed Project may exceed the existing and planned capacity of service providers to provide reliable services for existing and future development. Construction of new housing, particularly on larger sites identified under Program 1 of the Housing Element Update for potential rezone (Potential Rezone Program), may include excavation, removal of aging and/or undersized utility lines, and installation of the new lines located within existing paved streets and public rights-of-way. This is particularly true for potential housing sites involving greenfield development, such as Rezone Site No. 36 (Blue Sky Property) or any agricultural property on the South Coast, which could involve the conversion of existing agricultural lands with no existing municipal service connections to residential or mixed use development requiring connection to existing utilities.

Water Pressure

Municipal water supply agencies providing services to the unincorporated areas of the county manage their municipal water distribution systems in compliance with existing regulations to maintain adequate water pressures serving existing development. However, given the potential for maximum buildout of up to 34,558 new dwelling units and over 1.5 million square feet of commercial development under the Housing Element Update, there is potential for areas to have deficiency due to water pressure falling below acceptable standards to provide service to new development either as a result of substantial new development within identified low-pressure zones or as a result of the nature of proposed development. For example, higher water pressure may be required to provide adequate service to higher density or taller developments and meet pressure requirements for automatic sprinkler systems required as part of the CFC than could be accommodated by current infrastructure systems. Such development is not typical or does not currently exist in many of the service areas of local municipal water agencies; therefore, existing municipal water infrastructure may not currently be designed to provide necessary water pressure for development contemplated as part of the proposed Project, particularly for identified greenfield development sites located in lower-lying areas that could fall within a lower pressure zone. Potential examples of this could include Potential Rezone Program sites identified in the more coastal, lower-lying areas of the South Coast, such as Rezone Site Nos. 1 through 7 located within the service area of the Goleta Water District, and Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) within the service area of the CVWD. Similar issues may also exist for sites located within relatively level areas where gravity flow cannot be relied upon and other infrastructure (e.g., pumps) is used to provide adequate water pressure, such as Rezone Site No. 36 (Blue Sky Property) located within the service area of the Cuyama CSD.

The CFC and California Plumbing Code require that developers demonstrate that there is adequate water flow and pressure for both domestic supply and fire protection to serve the property. According to these existing regulations, if the pressure on the property is low, individual project developers would need to provide pumps on the property of the new development or pay for the public water service provider to install a loop line to ensure adequate pressure. However, due to the amount of development that could occur under the Housing Element Update and increased demand for water supplies, in conjunction with the demand for higher water pressure, existing water and wastewater lines may be undersized and the proposed Project could create additional strain on existing infrastructure or potential for future inadequacies in the system to support both existing and proposed development. Further, depending on the constraints of the system, there is potential that improvements necessary to provide adequate water supply and wastewater conveyance could become infeasible for individual development projects or the municipal water service agency to implement, either due to physical or logistical constraints associated with operation and maintenance of infrastructure, which would preclude implementation of certain potential housing developments and prevent attainment of the goals and policies of the Housing Element Update.

Overall, some residential and mixed use projects under the Housing Element Update would likely require the construction, expansion, and/or upgrade of existing water and wastewater infrastructure to adequately serve the project, which could potentially result in significant adverse environmental impacts. Therefore, impacts are considered *potentially significant.* For example, ground disturbance during construction could potentially disturb or destroy existing sensitive biological resources or uncover previously unknown buried cultural resources, as discussed in Section 3.4, *Biological Resources,* and Section 3.5, *Cultural and Tribal Resources*. For example, conversion of the South Patterson Agricultural Area to higher-density (i.e., 20 du/ac or more) residential uses could require

upsizing regional wastewater mains to convey increased flows to the Goleta Sanitary District's WWTP. This main lies along Atascadero Creek, where excavation and replacement of the existing pipe could substantially disturb resources associated with this creek corridor and the Atascadero Creek Greenway, designated by the Eastern Goleta Valley Community Plan. Construction of improvements would contribute to additional criteria pollutant and greenhouse gas emissions from the operation of construction equipment, as discussed in Section 3.3, *Air Quality,* and Section 3.6, *Greenhouse Gas Emissions*, respectively. As described in Section 3.9, *Hydrology and Water Quality,* ground disturbance may also contribute to an increased potential for erosion, sedimentation, or runoff on- and offsite which could adversely affect the quality of receiving waters. Further, construction could also introduce temporary new sources of noise associated with the operation of construction equipment, which are addressed in Section 3.11, *Noise*. As discussed in these sections, new residential and mixed use development enabled under the proposed Project would be potentially significant and subject to appropriate mitigation to reduce adverse impacts. However, as described in each of these sections, even with mitigation, construction impacts would remain significant and unavoidable for these resources; therefore, impacts associated with the construction or expansion of utilities such as water and wastewater facilities to serve potential housing projects would also be *significant and unavoidable*.

Impact UWS-2. The proposed Project would result in an increased water demand that could exceed the capacity of water purveyors to serve future development during normal, dry, and multiple dry years.

As summarized in Table 3.15-8 above, the proposed Project would plan for the development of housing projects that could generate up to an approximate additional 5,952.58 AFY of water demand. When compared to the aggregated total current supply (71,486 AFY), demand (47,015 AFY), and surplus (24,470 AFY) of all water districts serving unincorporated areas of the county, it appears that current water supplies could serve the additional development that would occur as a result of the proposed Project. However, the water supply in the county is extremely complex and must be analyzed based on the water supplies and constraints in each region and each water purveyor. Within each of the five HMAs, there are notable variations across water districts in sources and supply, as further described herein.

South Coast

Within the South Coast, municipal water services to unincorporated areas are provided by five separate water service agencies, including CVWD, the City of Santa Barbara, the Goleta Water District, La Cumbre Mutual Water Company, and the Montecito Water District. Based on water demand calculations presented in Table 3.15-8 above, the Housing Element Update has the potential to increase water demand up to an estimated 2,899.94 AFY in the South Coast. Based on the sites inventory, future residential and mixed use development enabled under the Housing Element Update would be distributed throughout the South Coast, within the service area of each of these five water service providers. In many cases, future residential development would involve ongoing development of SFDs or smaller MFDs on existing vacant lots, which would generate a nominal water demand, particularly for the CVWD, City of Santa Barbara, La Cumbre Mutual Water Company, and the Montecito Water District.

However, the Housing Element Update would potentially involve rezoning of housing sites within Goleta Water District , which could substantially increase water demand beyond available supplies, particularly long-term and under drought conditions. For instance, Rezone Sites Nos. 1 through 13

are all located within the service area of the Goleta Water District. Under the proposed Project, rezoning of these sites has the potential to result in the development of up to 73 new SFDs and 14,297 new MFDs, which could generate an estimated demand for 2,196.38 AFY of water, approximately 75.7 percent of the total estimated Project water demand in the South Coast. Based on the 2020 UWMP, the Goleta Water District has an existing available surplus water supply of 5,143 AFY and projects a future (2035) surplus water supply of 4,683 AFY under normal year conditions, 3,098 AFY under a single dry-year condition, and 0 AFY under multiple dry-year conditions in 2035 (Appendix H). Under normal year conditions, the proposed Project has the potential to result in additional demand for up to 47 percent of the Goleta Water District's projected available water supplies, increasing to nearly 71 percent under single dry-year conditions. Under future multiple-dry year conditions, the Goleta Water District does not have any surplus water supplies available to meet the demands of the Project. Further, as described in Section 3.9, *Hydrology and Water Quality,* the Goleta Water District receives a portion of its municipal water supplies from the Goleta Groundwater Basin, which has been adjudicated under the Wright Judgement and which limits the Goleta Water District's available water supplies, particularly in dry years when allocations for SWP supplies are low. In addition, Goleta Water District's Agricultural Conversion Restriction Amendment restricts the conversion of water from agricultural parcels to residential, commercial, and other uses. Several of the potential rezone sites identified as part of the Housing Element Update consist of agricultural parcels proposed for rezoning to higher-density residential (Rezone Site Nos. 1 through 9; Section 3.2, *Agricultural Resources*). As such, the development of these sites may not have existing entitlements and/or may not be able to procure new or additional connections to the Goleta Water District's water service system, nor would these sites be able to convert existing agricultural water entitlements to serve residential customers.

Further, in 2014, the Goleta Water District passed the SAFE Ordinance, which limits the district to providing new or additional water service connections at a rate that would not exceed one percent of the total potable water supply and only when certain conditions are met. These conditions have not been met since 2014, meaning only properties with existing entitlements are able to procure new or additional connections. However, based on current projections, Goleta Water District anticipates meeting these conditions at the start of the water year in December 2023. This would allow for the provision of new water allocations once the Goleta Water District Board of Directors has completed their review of water supply conditions (Goleta Water District 2023). Regardless, limitations on entitlements as a result of the SAFE Ordinance will be evaluated on a year-to-year basis, and the potential lifting of this ordinance does not guarantee similar opportunities in future years. The Goleta Water District has been discussing potential increases in the number of permits and water entitlements, which would allow for increased development. The Goleta Water District also reviewed their system's capacity and determined it as adequate to accommodate additional development identified in the sites inventory as described in the Housing Element Update. However, as noted in Chapter 3, *Environmental Impact Analysis*, this Program EIR conservatively analyzes the maximum potential buildout scenario of 34,558 units to assume a reasonable worst-case scenario based on potential zoning under the proposed Project. Based on the maximum potential development the sites inventory, rezone sites, and County-owned sites which are located within the Goleta Water District's service area, increased demand for municipal water supply would exceed the current water supply. Implementation of Program 14, *Water and Sewer Services,* of the Housing Element Update would help to reduce the potential for future development to exceed Goleta Water District's available water supplies by supporting the expansion of water services as needed to adequately serve potential housing sites, including selected rezone sites, and supporting changes to Goleta Water District's policies, including allowing the conversion of agricultural water to residential water for affordable

housing projects and allowing the transfer of water credits between properties. However, Program 14 does not guarantee that water supplies would be available to serve the maximum buildout potentially enabled under the Housing Element Update. Therefore, based on analysis of the maximum buildout scenario, potential increases in demand are still considered to potentially exceed Goleta Water District's available water supplies.

Lompoc Valley

Within the Lompoc Valley, the proposed Project would result in an anticipated increase in demand for municipal water supplies of 208.7 AFY. Based on the sites inventory prepared for the Housing Element Update, future development of residential and commercial uses within this region would be served by the Mission Hills CSD and Vandenberg Village CSD. These two water service providers currently report a surplus water supply of 700 AFY and 1,065 AFY, respectively. Potential buildout under the proposed Project would result in additional demand representing approximately 29.8 percent of the Mission Hills CSD's surplus water supply, or 19.6 percent of the Vandenberg Village CSD's surplus water supply when conservatively assuming all development in the region would be served by either of these districts. As part of the County's preparation of the Housing Element Update, both the Mission Hills CSD and Vandenberg Village CSD stated that they have sufficient resources to meet the demands of the Housing Element Update under normal and drought conditions. Thus, given the existing surplus supply of municipal water for each of these agencies, implementation of the proposed Project is not anticipated to result in a substantial adverse increase in demand for municipal water supplies, such that future increases in water demand could not be reliably met or such that expansion or improvement of the current water supply infrastructure would be required.

Santa Ynez Valley

Within the Santa Ynez Valley, the proposed Project would result in an anticipated increase in demand for municipal water supplies of 231.7 AFY. Future development of residential and commercial uses within this region would be served by either the Santa Ynez River Valley Water Conservation District Improvement District No. 1 or the Los Alamos CSD. However, a majority of the development would be located within the service area of the Los Alamos CSD. These two water service providers currently report a surplus water supply of 5,118 AFY and 375 AFY, respectively.

Potential buildout under the proposed Project would result in additional demand representing approximately 4.5 percent of the Santa Ynez River Water Conservation District Improvement District No. 1's surplus water supply, or 61.7 percent of the Los Alamos CSD's surplus water supply when conservatively assuming all development in the region would be served by either of these districts. While the Los Alamos CSD's water supplies are more limited, the Los Alamos CSD has anticipated and planned for meeting the water demands associated with buildout within its service area, which is based on the buildout of current zoning in the Los Alamos Community Plan Update. The sites inventory of the proposed Project identifies the buildout of existing vacant sites within the Los Alamos community under current zoning and does not identify any sites within the Los Alamos CSD service area as potential rezone sites. As a result, development under the Housing Element Update would largely occur consistent with the buildout assumptions and water supply and demand projections of the Los Alamos CSD. Further, future residential development within both the Los Alamos and Santa Ynez Valley communities would be subject to compliance with existing adopted plans and policies of their respective community plans. Thus, given the existing surplus supply of municipal water for each of these agencies, the proposed Project is not anticipated to result in a substantial adverse increase in demand for municipal water supplies, such that future increases in water demand could not be

reliably met or such that expansion or improvement of the current water supply infrastructure would be required.

Santa Maria Valley

Within the Santa Maria Valley, the proposed Project would result in an anticipated increase in demand for municipal water supplies of 2,316.9 AFY. Based on the sites inventory of the Housing Element Update, future development of residential and commercial uses within this region would be served by the Golden State Water Company-Orcutt and Casmalia CSD. However, nearly all of this development would be located within the service area of the Golden State Water Company-Orcutt, with development in the Casmalia CSD increasing water demand by only 3.26 AFY. The Golden State Water Company-Orcutt currently reports an existing surplus water supply of 0 AFY, and the Casmalia CSD would need to consult with Casmite Corporation prior to any significant increases in water demand.

In addition to physical supply limitations, the adjudication of the Santa Maria Groundwater Basin places regulatory constraints on additional development by requiring new urban uses to obtain water service from a public water supplier and to secure a supplemental water source from outside of the basin to offset the new water demand. Orcutt, served by Golden State Water Company-Orcutt, falls within the boundary of this adjudication. Golden State Water Company-Orcutt does not currently have any supplemental water supply sources that satisfy the requirements of the judgment and has been unable to provide the required supplemental water source. Instead, supplemental water has historically been supplied through agreements between developers and the City of Santa Maria, which has sufficient rights to SWP water to provide supplemental water to residential development.

Under the 2020 UWMP, the Golden State Water Company-Orcutt reports having zero shortfalls or surpluses under normal, single dry-year, and multiple dry-year (drought) conditions. However, this is because the Golden State Water Company-Orcutt evaluates trends in current supply and demand conditions regularly to manage its supplies to ensure its ability to meet demands in its service area. As such, the Golden State Water Company-Orcutt reports having reliable supplies to meet existing and future demands (Golden State Water Company, Tully and Young, and Zanjero 2021). Therefore, despite the Project's generated water demand exceeding available supplies, the proposed Project is not expected to result in the inability of the Golden State Water Company-Orcutt to meet the increased demand generated by future development under the Housing Element Update, even under drought conditions. The Casmalia CSD is much more constrained, given the limited remaining water supply identified in Section 3.15.2.1, *Water Existing Setting*. However, the development that could occur in the service area of Casmalia CSD is extremely limited, with only 18 units, none of which involve rezoning or land use changes. Additionally, in preparing the Housing Element Update, the County confirmed that Casmite Corporation, from which Casmalia CSD receives its water, has sufficient water supply to accommodate the potential minor infill development.

Cuyama Valley

Within the Cuyama Valley, the proposed Project would result in an anticipated increase in demand for municipal water supplies of 276.8 AFY. Based on the sites inventory prepared for the Housing Element Update, future development of residential and commercial uses within this region would be served by the Cuyama CSD, which has an existing surplus water supply of 44 AFY. As described in Section 3.9, *Hydrology and Water Quality, t*he Cuyama CSD receives its water for municipal services entirely from the Cuyama Valley Groundwater Basin, which is in a critical state of overdraft. Further, the Cuyama CSD water supply system operates off of a single groundwater well and there is no redundancy in its

system. While the Cuyama CSD has planned for the installation of a second well to improve its available water supplies, projected increases in demand for municipal water supplies resulting from the proposed Project would greatly exceed the Cuyama CSD's existing municipal water service capabilities by an estimated 232.8 AFY. The Housing Element Update could also result in the need to implement further improvements to the system to ensure reliable water supplies are available to meet the existing municipal water demands of the community and the needs of future development under the proposed Project. Therefore, based on analysis of the maximum buildout scenario, potential increases in demand are considered to potentially exceed Cuyama CSD's available water supplies.

Conclusion

Buildout of the sites inventory provided as part of the Housing Element Update would have the potential to result in additional demand for municipal water supplies from local water purveyors. Of the municipal water service agencies in the county serving potential housing sites, the Goleta Water District and Cuyama CSD may not have adequate reliable water supplies to serve the needs of development under the Project along with existing and projected future demands within their service areas. The additional demand generated by the Project may require the expansion or improvement of these districts' water supply systems, the implementation of which may result in additional physical impacts on the environment (refer also to Impact UWS-1 above).

Regardless of where future development occurs under the Housing Element Update, all future development would be subject to existing policies and regulations, including those of the County Code and Comprehensive Plan, applicable community plans, and local water purveyors' requirements for service. Under Section 35.30.100 of the LUDC, before issuance of a Land Use Permit or Zoning Clearance, the County must find that based on information provided by environmental documents, staff analysis, and the applicant, adequate public or private services and resources (e.g., water, sewer, roads) are available to serve a proposed development. On a project-by-project basis, this would help to ensure that individual development projects would not adversely affect the reliability of water supplies or the service district's resources.

In addition, as previously described, the Housing Element Update includes Program 14, Water and Sewer Services, which would support the expansion of water service area boundaries and infrastructure to adequately serve potential housing sites, including selected rezone sites. Program 14 would also require that the County work with Goleta Water District to support an amendment of the Goleta Water District Code to eliminate the limitations on converting the use of water from agricultural to housing uses and advocate for the reversal of their policy prohibiting the transfer of water credits from one property to another. Further, Program 15, Water and Sewer Service Priority for Affordable Housing, of the Housing Element Update would also require that the County provide the adopted Housing Element Update to each water service provider serving the unincorporated area to help each district understand and plan for future demand for services. Under the proposed Project, Programs 14 and 15 would help to ensure the availability and reliability of water supplies to serve future development enabled under the Housing Element Update. However, neither of these programs would guarantee that water supplies would be available to serve the maximum buildout potentially enabled under the Housing Element Update, and potential remains for future development enabled under the Housing Element Update to exceed projected available supplies.

Due to the projected increase in demand for water supplies and the current lack of reliable supplies to serve the maximum potential buildout enabled under the Housing Element Update, Project impacts are considered *potentially significant*. When analyzing based on the maximum potential buildout

scenario of up to 34,558 units, it is foreseeable that water supplies may not be adequate to serve the maximum potential buildout of the sites inventory. Additionally, housing projects approved earlier in the 8-year housing cycle may be more likely to secure adequate water entitlements than housing projects proposed later in the cycle due to the current water supply conditions. Additionally, finite water supplies may be granted to some projects and not others depending on water supply conditions at the time an applicant requests confirmation of service from the appropriate district. It is important to note, however, that the Housing Element Update through Program 1 aims to provide flexibility in density requirements and would allow development to occur at density levels lower than minimum zoning requirements so as not to preclude development completely if inadequate water supply exists to accommodate the development of a site to its fullest extent. While it is speculative where and to what degree individual projects may or may not be able to secure adequate water supplies on a site-by-site basis, it is foreseeable that some housing sites may have inadequate water supplies over the life of the proposed Project.

To help ensure adequate water supplies, **MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities)** would require applicants to secure water supplies and adequate infrastructure. However, as described above, even with implementation of this mitigation, future housing projects may not be able to secure services depending on timing and water conditions. The only way to fully avoid impacts associated with the development of housing under the Housing Element Update and the availability of reliable water supplies from local water purveyors would be to eliminate sites from consideration as part of the proposed Project, particularly sites identified within the service areas of the Goleta Water District and Cuyama CSD, thereby eliminating potential housing sites. Doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets, and such mitigation is considered infeasible. Therefore, impacts would be *significant and unavoidable.*

Impact UWS-3. The proposed Project would result in increased wastewater generation, which may exceed the capacity of wastewater treatment providers in the county and could require new wastewater facilities or the expansion of existing facilities, the construction of which could potentially result in significant environmental effects.

Potential future residential and mixed use development enabled under the proposed Project would generally be located in urban communities or adjacent to urban areas and would connect to the existing networks of wastewater collection lines through new laterals. As described above in *Methodology,* this analysis assumes that wastewater generation is the same as the calculated water demand presented in Table 3.15-8. As summarized therein, the proposed Project would generate an approximate additional 5,952.58 AFY or 5.31 MGD of wastewater requiring conveyance and treatment at local water treatment facilities. The unincorporated county is served by 16 wastewater service providers/districts that serve at least a portion of unincorporated county lands within each district or treat wastewater collected by neighboring districts. The statuses of these districts vary, and some require infrastructure and facility upgrades given the current ages or conditions of their collection, conveyance, and treatment systems, as further detailed herein.

It should also be noted that some housing sites identified in the Housing Element Update lie outside the boundaries of the existing districts, including the Goleta Sanitary District, and the extension of wastewater services to the sites would require annexation to the districts.

South Coast

Within the South Coast, wastewater collection and treatment services are provided by seven separate water service agencies, which include the Carpinteria Sanitation District, CSA 12 in partnership with the City of Santa Barbara, Goleta Sanitary District, Goleta West Sanitation District, Montecito CSD, and the Summerland Sanitary District. The proposed Project has the potential to increase wastewater generation by an estimated 2,918.54 AFY, or 2.61 MGD. Based on the sites inventory, future residential development would be distributed throughout the South Coast, within or near the service area of each of these wastewater districts. In many cases, future residential development would consist primarily of SFDs or smaller MFDs on existing vacant parcels, which would generate nominal additional wastewater, particularly for the Montecito CSD, Summerland Sanitary District, Carpinteria Sanitation District, and CSA 12. As part of the Housing Element Update, the County concluded that each district has more than adequate capacity to serve the needs of the ongoing development of existing vacant sites.

The Housing Element Update identifies several potential rezone sites within or adjacent to the service area of the Goleta Sanitary District and Goleta West Sanitation District (both of which are treated by the Goleta Sanitary District Regional WWTP). For example, Rezone Sites Nos. 1 through 10, No. 12, and No. 13 are all located within or adjacent to the service area of the Goleta Sanitary District, while Rezone Site No. 11 (Glen Annie) is located within the Goleta West Sanitation District service area. These sites represent the largest amount of housing proposed within the South Coast and have the potential to result in the development of up to 73 new SFDs and 14,297 new MFDs, which could generate an estimated 0.4 MGD of additional wastewater within the Goleta West Sanitation District services area and 2.19 MGD of wastewater within the Goleta Sanitary District service area. The Goleta Sanitary District and Goleta West Sanitary District have existing remaining wastewater treatment capacities of 1.04 MGD and 1.42 MGD, respectively, of their shares at the Regional WWTP. Therefore, the development of these sites would potentially exceed the existing capacity or require expansion or improvements to the Goleta Sanitary District's WWTP.

Lompoc Valley

Within the Lompoc Valley, the proposed Project would result in a potential maximum increase in wastewater generation of 0.19 MGD. Based on the sites inventory of the Housing Element Update, future residential and mixed use development within this region would be served by the Mission Hills CSD and Vandenberg Village CSD. The Mission Hills CSD currently reports having an existing remaining capacity to treat 0.20 MGD at the La Purisima WWTP. Wastewater treatment for the Vandenberg Village CSD is provided by the Lompoc Regional Wastewater Reclamation Plant through an agreement with the City of Lompoc. Under the agreement, the Vandenberg Village CSD is allowed a capacity share of 0.89 MGD of wastewater treatment. Approximately 0.44 MGD of treatment capacity remains under Vandenberg Village CSD's share. Potential buildout under the proposed Project would result in additional demand representing approximately 90 percent of the Mission Hills CSD's remaining treatment capacity, or 40.9 percent of the Vandenberg Village CSD's remaining treatment capacity when conservatively assuming all development in the region would be served by either of these districts. While the proposed Project's demands for adequate wastewater treatment would be a substantial portion of the remaining treatment capacity, the increase would not exceed the existing capacity or require expansion or improvements to the WWTPs. Further, as part of the preparation of the Housing Element Update, County coordination with all Lompoc Valley service districts concluded that each district has adequate capacity to serve the needs of the proposed development.

Santa Ynez Valley

Within the Santa Ynez Valley, the proposed Project would result in a potential maximum increase in wastewater generation by 0.2 MGD. Based on the sites inventory of the Housing Element Update, future development of residential and mixed uses within this region would be served by the Los Alamos CSD, Los Olivos CSD, and the Santa Ynez CSD.

The Los Alamos CSD's treatment system is currently rated to treat up to 0.4 MGD of wastewater but is limited by its discharge capacity, which is only 0.2 MGD. The district currently treats approximately 0.125 MGD. Based on the limited discharge capacity, the district has an estimated remaining treatment capacity of 0.075 MGD. The Housing Element Update currently identifies 26 existing vacant sites and 1 Pending Project (Rezone Site No. 48 [Price Ranch]) within the Los Alamos CSD service area that are assumed to be developed consistent with existing zoning designations, resulting in potential development of up to 126 SFDs and 435 MFDs. Based on this buildout, development enabled under the Housing Element Update may generate an additional 0.14 MGD, which would exceed the remaining discharge capacity of Los Alamos CSD's wastewater treatment system. However, the Los Alamos CSD has identified the need for infrastructure upgrades to increase the permitted capacity of the treatment facility to support the full buildout of the Los Alamos CSD service area under existing zoning. Development enabled under the Housing Element Update would contribute to the need for infrastructure upgrades.

Wastewater treatment for the Santa Ynez CSD is provided by the Solvang WWTP through an agreement with the City of Solvang. Under the agreement, the Santa Ynez CSD is allowed a capacity share of 0.3 MGD of wastewater treatment. Approximately 0.16 MGD of treatment capacity remains under Santa Ynez CSD's share. The Housing Element Update currently identifies 15 existing vacant sites and 1 potential rezone site (Rezone Site No. 35 [Chumash LLC]) within the Santa Ynez CSD, resulting in the potential development of up to 34 SFDs and 305 MFDs. Based on this buildout, development enabled under the Housing Element Update may generate an additional 0.06 MGD, which would be within the remaining treatment and discharge capacity of Santa Ynez CSD's wastewater treatment system. Therefore, implementation of the Housing Element Update and development of these sites is not anticipated to generate increases in wastewater which would exceed the capacity of the Santa Ynez CSD's treatment and disposal system.

The Los Olivos CSD was recently formed in 2018 to provide a funding mechanism for the building and operation of facilities needed to collect, treat, and dispose of sewage, wastewater, recycled water, and stormwater in Los Olivos. No facilities have yet been built, and all wastewater remains managed through private OWTS. In planning for the design and treatment capacity of the system, the Los Olivos CSD is evaluating existing wastewater generation from existing development, as well as potential wastewater generated from the buildout of existing vacant parcels under current zoning regulations (G. Savage, General Manager, Los Olivos CSD, personal communication, August 31, 2023). The Housing Element Update currently identifies six existing vacant sites within the Los Olivos CSD service area that are assumed to be developed consistent with existing zoning designations. Therefore, implementation of the Housing Element Update and development of these sites is not anticipated to conflict with or be inconsistent with the Los Olivos CSD's current plans for the design of its wastewater system.

Santa Maria Valley

The main wastewater service provider in the Santa Maria Valley is the Laguna County Sanitation District, which serves the unincorporated community of Orcutt. The Laguna County Sanitation District

and the City of Santa Maria have an agreement to treat small areas of each other's service areas, and there is one potential housing site that falls within this agreement area; therefore, although it is located in the unincorporated community of Orcutt, wastewater from this site would be treated by the City of Santa Maria's WWTP. Given the limited development enabled in the area that would be treated by this jurisdiction and the additional remaining capacity of the plant, the Project would be responsible for a nominal increase (approximately 0.015 MGD) and is not anticipated to result in exceedances to the capacity of the City's WWTP. Apart from Laguna County Sanitation District and the small portion of the unincorporated community served by the City of Santa Maria, elsewhere in the Santa Maria Valley where future housing is proposed, such as in Casmalia, development relies on private OWTS (e.g., septic tanks, leech fields) to manage wastewater. The Laguna County Sanitation District is currently rated to treat up to 3.7 MGD of wastewater but is limited by its discharge capacity, which is only 2.7 MGD. The district currently treats approximately 1.7 MGD. Based on the limited discharge capacity, the district has an estimated remaining treatment capacity of 1.0 MGD. Under the proposed Project, future housing development enabled under the proposed Project has the potential to generate an estimated 2.0 MGD of wastewater. Conservatively assuming that most development would be served by the Laguna County Sanitation District, the additional generation of 2.0 MGD of wastewater would not exceed the district's rated treatment capacity. However, it would result in an exceedance of the discharge capacity of the system. To increase overall capacity, additional discharge connections are needed. The district is designing two extensions to golf courses to expand discharge capacity, which would increase the overall capacity of the WWTP. Nevertheless, the proposed Project would still increase wastewater generation such that additional disposal options would need to be identified.

Cuyama Valley

Wastewater effluent in the Cuyama Valley is treated by the Cuyama Valley CSD WWTP, which currently has an available remaining capacity to treat 0.12 MGD of wastewater. Under maximum potential Project buildout, wastewater generation within the Cuyama CSD service area could increase by up to 0.25 MGD. The increase in wastewater generation is primarily attributed to Rezone Site No. 36 (Blue Sky Property) and would substantially increase wastewater flows, nearly doubling the remaining treatment capacity. As such the proposed Project could exceed the remaining capacity of the Cuyama CSD WWTP or result in Cuyama CSD being unable to serve future development under the Project.

Conclusion

In summary, the maximum potential Project buildout would have the potential to substantially increase wastewater generation requiring conveyance and treatment by local sanitary districts. While several districts have existing capacity to serve the development enabled under the Project, the Goleta Sanitary District, Goleta West Sanitary District, the Los Alamos CSD, Laguna County Sanitation District, and Cuyama CSD would not have adequate capacity to treat and/or dispose wastewater generated by existing development and future residential and commercial development under the proposed Project.

Regardless of where future development occurs under the Housing Element Update, all future development would be subject to existing policies and regulations, including those of the County Code and Comprehensive Plan, applicable community plans, and local sanitary districts' requirements for service. Under Section 35.30.100 of the LUDC, before issuance of a Land Use Permit or Zoning Clearance, the County must find that based on information provided by environmental documents,

staff analysis, and the applicant, adequate public or private services and resources (e.g., water, sewer, roads) are available to serve a proposed development. On a project-by-project basis, this would help to ensure that future individual development projects enabled under the Housing Element Update would not adversely affect the reliability of wastewater treatment capacity or the service district's resources, whether through the County's discretionary review process and/or through the implementation of **MM UWS-1**, discussed below.

In addition, the Housing Element Update includes Program 14, *Water and Sewer Services*, which directs the County to support wastewater treatment providers' efforts to expand the capacity of facilities. Housing Element Update Program 15, *Water and Sewer Service Priority for Affordable Housing*, would also require the County provide the adopted Housing Element Update to each wastewater service provider serving the unincorporated area to help each district understand and plan for future demand for services. Under the proposed Project, Programs 14 and 15 would help to ensure adequate wastewater treatment capacity is maintained to serve future development under the Housing Element Update.

However, due to the projected increase in wastewater generation that could exceed the capacity of treatment or discharge facilities in the Los Alamos CSD, Goleta Sanitary District, Goleta West Sanitary Districts, Laguna County Sanitation District, and Cuyama CSD, impacts are considered *potentially significant*. When analyzing based on the maximum potential buildout scenario of up to 34,558 units, it is foreseeable that wastewater treatment or discharge capacity may not be adequate to serve all potential housing sites identified in the Housing Element Update. Additionally, housing projects approved earlier in the eight-year housing cycle may be more likely to secure adequate capacity in the existing wastewater treatment system than housing projects proposed later in the cycle. Additionally, finite wastewater treatment capacity may be granted to some projects and not others depending on available resources and conditions at the time an applicant requests letters from the appropriate district. It is important to note, however, that the Housing Element Update Program 1, *Adequate Sites for RHNA and Monitoring of No Net Loss,* aims to provide flexibility in density requirements and would allow development to occur at density levels lower than minimum zoning requirements so as not to preclude development completely if inadequate wastewater infrastructure or capacity exists to accommodate the development of a site to its fullest extent. While it is speculative where and to what degree individual projects may or may not be able to secure adequate wastewater treatment capacity on a site-by-site basis, it is foreseeable that some potential housing sites may have inadequate wastewater treatment over the life of the proposed Project.

MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities) would require applicants to secure wastewater treatment capacity and adequate infrastructure. However, mitigation may not ensure adequate services could be provided for all potential housing sites over the life of the proposed Project. The only way to fully avoid impacts associated with the development of housing under the Housing Element Update and the limitations on wastewater treatment capacity for some sanitation districts would be to eliminate sites from consideration as part of the proposed Project, particularly sites identified within the service areas of Los Alamos CSD, Goleta Sanitary District, Goleta West Sanitary Districts, Laguna County Sanitation District, and Cuyama CSD, thereby eliminating potential housing sites from future development of housing. Doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets, and such mitigation is considered infeasible. Therefore, impacts would be *significant and unavoidable.*

Impact UWS-4. The proposed Project would result in the generation of solid waste that could exceed relevant standards and/or the capacity of existing waste disposal facilities serving the county, as well as impair the attainment of solid waste reduction goals.

New residential development allowed under the proposed Project would increase solid waste generation in the county, resulting in increased demand for waste disposal and landfill services. As summarized in Table 3.15-9, the maximum potential buildout of the proposed Project could generate an estimated 245.23 tpd of additional solid waste or 12,418.36 cy of waste per year. Depending on the region, solid waste would be disposed of at different facilities, each of which has varying remaining capacities.

The Tajiguas Landfill receives and is the disposal site for solid waste for the South Coast, Santa Ynez, and Cuyama Valley regions and has an existing remaining disposal capacity of 1,680,900 cy, an anticipated closure date of 2026, and a permitted throughput of 1,500 tpd. In September 2023 a Draft Subsequent EIR was published for the Tajiguas Landfill Capacity Increase Project. Completion of this project is estimated to occur in Fall 2025 and would increase the capacity of the landfill by approximately 6.1 million cy, extending the anticipated closure date to December 2038 (RRWMD 2023b). Future development under the proposed Project within regions served by the Tajiguas Landfill is estimated to generate 133.71 tpd or 7,123.94 cy per year of solid waste, representing approximately 8.9 percent of the landfill's average daily throughput capacity and 0.09 percent of the landfill's total remaining capacity per year (assuming that completion of the expansion does occur in 2025). Therefore, future development within the South Coast would not substantially contribute to an exceedance of the Tajiguas Landfill disposal capacity and existing facilities could accommodate development enabled under the proposed Project.

Within the Lompoc Valley, municipal solid waste is delivered to and disposed of at the Lompoc Sanitary Landfill, which has an existing remaining disposal capacity of 2,146,779 cy. Future residential development under the proposed Project within the Lompoc Valley is estimated to generate 7.55 tpd or 356.45 cy per year of solid waste, representing approximately 1.8 percent of the landfill's average daily throughput capacity and less than 0.01 percent of the landfill's total remaining capacity per year. Therefore, future development within the Lompoc Valley would not substantially contribute to an exceedance of the Lompoc Sanitary Landfill disposal capacity and existing facilities could accommodate development enabled under the proposed Project.

The Santa Maria Regional Landfill receives and is the disposal site for solid waste from the Santa Maria Valley. The Santa Maria Regional Landfill has a remaining disposal capacity of 1,477,580 cy. Future residential development under the proposed Project within the Santa Maria Valley is estimated to generate 103.98 tpd or 4,937.97 cy per year of solid waste, representing approximately 1.7 percent of the landfill's average daily throughput capacity and 0.3 percent of the landfill's total remaining capacity per year. However, the City of Santa Maria has been planning for the eventual closure of the Santa Maria Regional Landfill, which is anticipated to occur by 2028, by planning for the creation of the Los Flores Integrated Waste Management Facility, a new waste disposal facility that will replace the Santa Maria Regional Landfill as the waste disposal facility serving the Santa Maria Valley to accommodate growing solid waste disposal needs. Therefore, future development within the Santa Maria Valley would not substantially contribute to an exceedance of the disposal capacity of the Santa Maria Regional Landfill or Los Flores Integrated Waste Management Facility and existing and planned facilities could accommodate development enabled under the proposed Project.

Based on the estimated solid waste generated by residential and commercial development enabled under the Housing Element Update, existing regional landfills serving the unincorporated areas where housing is proposed have adequate near-term capacity to serve additional development under the Project. However, despite the adequacy of average daily throughput capacity at all landfills, the proposed Project would contribute additional solid waste, which would reduce the life expectancy of the landfills (i.e., the landfills would be filled and closed earlier than without the additional development). When a landfill has reached maximum capacity, it either must be expanded to accommodate more solid waste, or it must be closed. If the landfill is closed, a new landfill must be developed to accommodate more solid waste.

The Lompoc Sanitary Landfill has an expected closure date of 2045 and has adequate capacity to accommodate additional waste generated in the region from development under the Housing Element Update. Similarly, with the planned expansion of Tajiguas Landfill and pending completion of the new Los Flores Integrated Waste Management Facility, development in the South Coast, Santa Ynez Valley, Cuyama Valley, and Santa Maria Valley regions would have adequate solid waste disposal capacity.

It is important to note that the Program EIR's analysis of solid waste impacts is highly conservative. Many published waste generation rates for within and outside of the county are outdated and do not account for more recent standards or regulations that mandate reductions in solid waste generation or increased requirements for waste diversion that residential and commercial development under the proposed Project would be subject to. For instance, under SB 1383, future residents would be required to separate organic and recyclable materials from trash, and either subscribe to and participate in their jurisdiction's organics curbside collection service or self-haul organic waste to a specified composting facility, community composting program, or other collection activity or program (CalRecycle 2022a). In addition, development under the Project would need to comply with CalGreen, which requires a minimum of 65 percent of all construction waste to be recycled. Although there could be demolition of some existing structures, such as Rezone Site No. 29 (Hummel Cottages) and No. 25 (Mariposa Real), the large majority of construction relating to the Project would be construction of new structures, which generally creates less waste than demolition or remodeling. Further, all development projects in the county must include a SWMP to comply with this recycling requirement (RRWMD 2022a). The proposed Project would be compliant with these codes and policies, as well as all other policies relating to solid waste generation, reduction, and diversion, as discussed in Section 3.10, *Land Use and Planning*. Compliance with these regulations, plans, and programs would reduce the amount of solid waste generated by proposed development that would be buried at a landfill, reducing impacts associated with the capacity of landfills. Additionally, the incorporation of **MM UWS-2, Source Reduction and Solid Waste Management Plan (SRSWMP)**, would require further waste reduction measures during the operation of development enabled under the proposed Project.

When analyzing impacts relating to solid waste generation, it is important to note the County's current diversion rate of approximately 69 percent, which is not factored into waste generation calculations for this Program EIR; as a result, the amount of solid waste that would permanently reside in landfills is likely to be significantly less than that calculated in this analysis. However, the diversion rate is the aggregate result of all County and local programs that aim to reduce waste and cannot be calculated on a site-by-site basis; households would, regardless, generate a certain amount of waste that would need to be managed. Therefore, although diversion rates help to reduce waste, to analyze a reasonable worst-case scenario, these rates are not factored into calculations in this Program EIR.

Based on the County's thresholds for solid waste generation, if a project would result in 196 tpy of additional waste generated, after reduction and diversion efforts, impacts relating to solid waste

generation would be considered significant and unavoidable As previously described, the proposed Project would have the potential to generate up to a combined total of 245.23 tpd, or 89,509.35 tpy of solid waste, which would exceed the County's adopted thresholds.

Therefore, although existing regulations for diversion rates and solid waste reductions, as well as **MM UWS-2 (Source Reduction and Solid Waste Management Plan [SRSWMP])**, would help reduce the Project's impacts, given the substantial amount of solid waste potentially generated and the exceedance of County thresholds, impacts are considered *significant and unavoidable*.

3.15.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of long-range plans, policies, and initiatives as well as development projects (housing and non-housing related) in the unincorporated county and surrounding incorporated cities. Project impacts along with potential impacts from past, pending, and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects, such as the Accessory Dwelling Unit (ADU) Ordinance Amendments (Cumulative Project No. 13) to incorporated cities in Santa Barbara County's 2023-2031 Housing Element Update (Cumulative Project No. 1 – 8) (Table 3-6).

The proposed Project would result in cumulatively considerable impacts if it, in combination with other past, present, and pending plans and projects (Tables 3-6, 3-7, and 3-8; Appendix I), would result in substantial adverse impacts associated with the need for or provision of new or physically altered water, wastewater, or solid waste facilities, the construction of which could cause significant environmental impacts. Under each of these cumulative projects, each agency is planning for how to meet local housing needs and the RHNA plus the 15 percent buffer for lower- and moderate-income units assigned by the Santa Barbara County Association of Governments (SBCAG) by identifying potential sites for new housing development, potential sites for rezoning to residential uses, as necessary, and implementing a variety of programs that would encourage or facilitate new residential development. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units (Table 3-6).

While impacts relating to utilities and water supply would be addressed on a case-by-case basis to mitigate impacts resulting from each project, and cumulative pending development would be subject to compliance with existing regulations addressing utilities and utility infrastructure, implementation of the proposed Project would continue to have the potential to result in substantially adverse impacts associated with increases in development and consequential increases in demand for utility services and water supply. Other cumulative projects, such as the housing element updates proposed by the eight incorporated cities, also have the potential to result in increased development and contribution to additional utilities and water supply demands. The cumulative effect of regional growth and increases in demand for utilities and infrastructure would have the effect of reducing the reliability or availability of water supplies, the capacity of municipal water treatment facilities, the capacity of water and wastewater conveyance and treatment infrastructure, and the capacity of regional landfill and waste recycling and transfer facilities, such that utilities may not be able to accommodate proposed cumulative development and regional growth. As such, there would be a cumulative impact related to utilities and water supply, of which the Project's contribution would be cumulatively considered *significant and unavoidable.*

3.15.4.4 Proposed Mitigation

MM UWS-1. Infrastructure, Services, Utilities, and Related Facilities. Applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be served by public water and wastewater (sewer) districts or agencies, if such service is available, consistent with the County's zoning ordinances as well as the CFC and California Plumbing Code. The applicant shall provide documentation from the appropriate public water and wastewater districts or agencies demonstrating that adequate water and wastewater services are available to serve the project; this includes water supply, system pressure, and service infrastructure, as well as wastewater conveyance and treatment capacity. The documentation shall also identify any required service extensions or improvements that are required to adequately serve the project, such as sewer laterals and main connections adequately sized to convey project wastewater flows, or water mains designed and sized to provide adequate flows and pressure to serve the project's general water demands and fire flows (i.e., pumps), considering the proposed height of the project's buildings.

Requirements and Timing. Documentation from the appropriate public water and wastewater districts or agencies shall be obtained by the applicant and submitted as part of project application materials. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the future proposed project.

Monitoring. County P&D shall review and confirm that adequate water supply and infrastructure and wastewater conveyance and treatment capacity are available to serve the project.

MM UWS-2. Source Reduction and Solid Waste Management Plan (SRSWMP). Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include an SRSWMP describing proposals to reduce the amount of waste generated during construction and throughout the life of the project and enumerating the estimated reduction in solid waste disposed at each phase of project development and operation.

Requirements and Timing: The plan shall include but not be limited to:

- Operation Source Reduction:
  - A program to purchase materials that have recycled content for operation (e.g., office supplies)
- Operation Solid Waste Reduction Examples:
  - An Applicant/owner-specified amount of square feet of space and/or bins for storage of recyclable materials within the project site OR within each unit.
  - Establish a recyclable material pickup area.
  - A green waste source reduction program, including the creation of lots and/or common composting areas, and the use of mulching mowers in all common open space lawns.
  - Implement a new curbside recycling program (may require the establishment of private pick-up depending on the availability of County-sponsored programs) or participate in an existing program to serve the new development. If County P&D determines that a curbside recycling program cannot be implemented, and an alternative program is not

online, then it will be the responsibility of the applicant/owner to contract with the Community Environmental Council or some other recycling service acceptable to County P&D to implement a project-wide recycling program.

- Implement a backyard composting yard waste reduction program.

The Applicant/owner shall submit an SRSWMP to County P&D permit processing staff for review and include the recycling and composting areas on building plans, as applicable. Program components shall be implemented prior to Final Building Clearance and maintained throughout the life of the project.

Monitoring: During operation, the Applicant/owner shall demonstrate to County P&D compliance staff as required that solid waste management components are established and implemented. The Applicant/owner shall demonstrate to County P&D compliance staff that all required components of the approved SRSWMP are in place, as required, prior to Final Building Clearance.

3.15.4.5 Secondary Impacts

MM UWS-1 would potentially require the construction or expansion of utilities such as water and wastewater facilities, resulting in *potentially significant* secondary environmental impacts on other key resources. For example, ground disturbance during construction could potentially disturb or destroy existing sensitive biological resources or uncover previously unknown buried cultural resources, as discussed in Section 3.4, *Biological Resources,* and Section 3.5, *Cultural and Tribal Resources*. For example, conversion of the South Patterson Agricultural Area to higher-density (i.e., 20 du/acre or more) residential uses could require upsizing regional wastewater mains to convey increased flows to the Goleta Sanitary District's WWTP. This main lies along Atascadero Creek, where excavation and replacement of the existing pipe could substantially disturb resources associated with this creek corridor and the Atascadero Creek Greenway, designated by the Eastern Goleta Valley Community Plan. Construction of improvements would contribute to additional criteria pollutant and greenhouse gas emissions from the operation of construction equipment, as discussed in Section 3.3, *Air Quality,* and Section 3.6, *Greenhouse Gas Emissions*, respectively. As described in Section 3.9, *Hydrology and Water Quality,* ground disturbance may also contribute to an increased potential for erosion, sedimentation, or runoff on- and offsite which could adversely affect the quality of receiving waters. Further, construction could also introduce temporary new sources of noise associated with the operation of construction equipment, which are addressed in Section 3.11, *Noise*. As discussed in these sections, new residential and mixed use development enabled under the proposed Project would be *potentially significant* and subject to appropriate mitigation to reduce adverse impacts. However, construction impacts would remain significant and unavoidable for these resources; therefore, secondary impacts associated with the construction or expansion of utilities such as water and wastewater facilities to serve potential housing projects would be *significant and unavoidable*.

3.15.4.6 Residual Impacts

Impact UWS-1. As discussed for affected resources in other sections of this Program EIR, construction of individual residential and commercial development projects enabled by the proposed Project would result in potential physical impacts as a result of construction, expansion, or installation of utility infrastructure to serve new development. As discussed in these sections, new residential and mixed use development enabled under the proposed Project would be potentially significant and

subject to appropriate mitigation to reduce adverse impacts. However, construction impacts would remain significant and unavoidable for these resources; therefore, impacts associated with the construction or expansion of utilities such as water and wastewater facilities to serve potential housing projects would be *significant and unavoidable*.

Impact UWS-2. Potential development resulting from the proposed Project would generate additional water demand that would exceed the available water supply of Goleta Water District and Cuyama CSD, resulting in a lack of reliable water supplies to meet Project demands. To help ensure adequate water supplies, **MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities)** would require applicants to secure water supplies and adequate infrastructure; however, impacts would remain *significant and unavoidable*.

Impact UWS-3. Potential development resulting from the proposed Project would generate additional wastewater that would exceed the available permitted and design treatment and/or discharge capacity of Los Alamos CSD, Goleta Sanitary District, Goleta West Sanitary Districts, Laguna County Sanitation District, and Cuyama CSD, resulting in the potential inability for wastewater service providers to meet existing and Project demands. To help ensure adequate water supplies, **MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities)** would require applicants to secure water supplies and adequate infrastructure; however, impacts would remain *significant and unavoidable*.

Impact UWS-4. While future development would be subject to existing laws, regulations, plans, and policies to reduce the amount of solid waste generated and disposed of in regional landfills and use by-right projects would also be subject to **MM UWS-2 (Source Reduction and Solid Waste Management Plan [SRSWMP])**, potential development resulting from the proposed Project would generate additional municipal solid waste that would exceed the County's adopted thresholds. Due to the nature of the proposed Project, no feasible mitigation measure exists that could reduce impacts relating to exceedance of the thresholds, and impacts would remain *significant and unavoidable*.

Section 3.16
Wildfire

3.16.1 Introduction

This section describes potential wildfire hazards and vulnerabilities that could be exacerbated by future development enabled under the 2023-2031 Housing Element Update (Housing Element Update; Project) as proposed by the County of Santa Barbara (County). A wildfire is an unplanned fire that is fueled by natural areas or wildlands, such as the Los Padres National Forest (LPNF), or undeveloped ranchland, particularly in the Santa Ynez Mountains or San Rafael Mountains. Of critical concern within Santa Barbara County is the wildland-urban interface (WUI), where wildfire can burn buildings and infrastructure on the edge of developed neighborhoods and communities. This analysis describes the physical setting for wildfire, wildfire risk, and the regulations that apply to wildfire management, emergency response and access, and development standards for residential development in areas that are vulnerable to wildfire. The impact analysis assesses the risk of exposure to wildfire or post-wildfire hazards, specifically in vulnerable areas in the WUI, including the increased potential for ignition.

3.16.2 Environmental Setting

3.16.2.1 Existing Fire Hazards and Contributing Factors

Santa Barbara County experiences annual cycles of elevated fire danger due to its highly flammable vegetation, mountainous terrain, low annual precipitation, and high velocity "sundowner" and Santa Ana winds. The Santa Ynez Mountains and other wildland areas are subject to dry conditions during fire season, seasonal 40- to 50-mile-per-hour winds, and high temperatures of over 90 degrees that contribute to a much higher threat of wildfire year-round. As such, much of the county is subject to high fire hazards. Over the last 88 years, the county has been subject to 42 major wildfires, resulting in a 48 percent chance of occurrence in any given year (Santa Barbara County Office of Emergency Management [SBCOEM] 2022).

The California Department of Forestry and Fire Prevention (CAL FIRE) provides a Fire Season Outlook for active incidents as well as incidents in previous years. The outlook is a summary of all incidents (10+ acre wildfires), including those managed by CAL FIRE and other partner agencies. In 2022, CAL FIRE reported 7,477 fire incidents, an estimated 331,360 acres burned, damage to 876 structures, and 9 confirmed fatalities (CAL FIRE 2022). As of July 2023, CAL FIRE has reported 3,032 wildfire incidents, an estimated 10,459 acres burned, and damage to 4 structures this year (CAL FIRE 2023). Recent trends indicate fire season in California is starting earlier and ending later, with the length of fire season increasing by 75 days across the Sierra Nevada, resulting in a fire season that begins earlier and ends later than in prior years. A primary driver of expanded fire season is climate change. Warmer temperatures, increased periods of drought, reduced snowpack, and earlier spring snowmelt create longer and more intense dry seasons that make vegetated areas more susceptible to severe wildfires (CAL FIRE 2022). Other factors exacerbating wildfire risk in California include a widespread tree mortality epidemic due to insect infestations and structural development expanding into WUI areas.

As described further below, several factors combine to contribute to high wildfire risk in the county, including vegetation and fuel, topography, and climatic conditions.

Fuel and Vegetation

Vegetation within the county includes chaparral, coastal sage scrub, riparian, and oak woodlands, all of which are classified as highly combustible and have high biomass density levels. These vegetation types are particularly susceptible to ignition during dry summer conditions and droughts. Since 2012, Santa Barbara County has experienced drought and dry periods with only limited wet years, with a statewide drought emergency that persisted from 2012 through 2017. According to the National Integrated Drought Information System (NIDIS) by the National Oceanic and Atmospheric Administration (NOAA), the county is not currently classified as being in drought conditions. This is primarily due to the heavy rain events that occurred from December 2022 into January 2023. However, until January 2023, 100 percent of the county was identified in NIDIS as an area in D1 – Moderate Drought, and 6.62 percent of the county was identified as an area in D2 – Severe Drought (NOAA 2023). This drought condition dries out vegetation and exacerbates wildfire risk in the county. Additionally, seasonal drying of vegetation produces conditions that can result in fuel-driven wildfires and fire-associated climatic changes. This condition is referred to as a plume-dominated wildfire. Plume-dominated wildfires are fires where the energy produced by the fire, in conjunction with atmospheric instability, creates significant convective forces and increased wind speeds. These vegetation characteristics combine to create extreme, unpredictable, and rapidly spreading wildfires. These vegetation areas are commonly referred to as "fuel beds" and within the county often have steep topography and a lack of roads or natural barriers (Santa Barbara County Fire Department [SBCFD] and CAL FIRE 2021).

Topography

Santa Barbara County is characterized by several ranges of steeply sloping foothills, narrow canyons, and low-lying coastal plains, as well as several mountain ranges, with urban development often located in more level valleys bordered by steep areas. The county has a mountainous interior, primarily made up of three mountain ranges: the Santa Ynez Mountains, the San Rafael Mountains, and the Sierra Madre Mountains. The majority of the mountainous region is within the LPNF. These areas of steeper slopes can result in a faster-moving fire with longer flame lengths (County of Santa Barbara Planning and Development [P&D] and SBCFD 2019). This makes the south-facing slopes of the Santa Ynez Mountains located upslope of the urbanized South Coast particularly hazardous. Additionally, the narrow drainage and sub-drainage topographic features of the Santa Ynez Mountains can funnel winds, increase wind speeds, erratically alter wind direction, and facilitate rapid fire spread (SBCOEM 2022). The topography in the rural interiors of the county also limits access with few rural roads and challenging terrain for wildland firefighters to navigate during a wildfire.

Climate

The local climate is typically warm and dry in summer and cooler and wetter in winter. Most of the county's rivers, creeks, and streams remain dry during the summer months. High winds, like the "sundowner" and Santa Ana winds throughout the region, can cause a wildfire to rapidly advance

through already dry vegetation, posing a major challenge to firefighting.[1] Further, drought conditions can extend the duration of warm, dry summers. The recent 2012-2017 drought conditions exceeded historic norms and caused significant stress to native and introduced/cultivated vegetation (SBCFD and CAL FIRE 2021).

Based on research performed by the State of California Governor's Office of Planning and Research (OPR), climate change is now playing a significant role in increasing the frequency and severity of wildfires. Increasing temperatures and changing fire behavior associated with climate change coupled with population growth and development are expected to continue exposing California forest lands, natural resources, and residential neighborhoods to wildfire hazards, particularly in WUI areas. Climate change-driven wildfire behavior, the frequency of human-caused ignitions, past vegetation and wildfire management practices and policies, and more extensive and drier fuel loads all create increased wildfire hazards. Increasing temperatures may intensify wildfire threat and susceptibility to more frequent wildfires in the county. The County's Climate Change Vulnerability Assessment (CCVA) estimates that the annual average acres burned is expected to increase to 23,040 acres per year (30 percent increase) by 2030, 25,782 acres per year (46 percent increase) by 2060, and 24,050 acres per year (36 percent increase) by 2100 due to higher annual average temperatures and the increased frequency and intensity of droughts (County of Santa Barbara 2021).

3.16.2.2 Historic Wildfires in Santa Barbara County

In recent history, Santa Barbara County has experienced over 16 major wildfires impacting unincorporated areas. Recent fires have been burning faster and bigger due to drier vegetation related to recent drought conditions, potentially exacerbated by climate change (NOAA 2021). These conditions allow for intense fires that can spread quickly and threaten urban areas. Several of these fires (Thomas, Gap, Tea, Jesusita, Sherpa, and Whittier) directly threatened the heavily populated South Coast and cities/unincorporated communities in North County (Canyon, Rucker, Alamo). Six of these fires (Thomas, Sherpa, Tea, Jesusita, Alamo, and Whittier) destroyed structures. The Thomas Fire was responsible for the destruction of over 1,000 structures, approximately 80 of which were in Santa Barbara County (the majority of structures burned were in Ventura County). The Thomas Fire also played a large role in the debris flows that occurred in Santa Barbara and Montecito in January



The 2017 Thomas Fire burned approximately 281,893 acres in Ventura and Santa Barbara counties, making it the then largest California wildfire in modern history. The fire was started by power lines coming in contact during high winds and remained active for 40 days. At one point, 8,500 emergency personnel from all across the western U.S. were working to contain the fire. The fire resulted in the destruction of 1,063 structures and one civilian and one firefighter fatality.
Source: SBCOEM 2022.

[1] Sundowner winds are hot, gusty winds from the Santa Ynez Mountains, that can raise the temperature in the region by 20 degrees Fahrenheit (County of Santa Barbara 2021).

2018, which caused the loss of 23 lives and extensive structure and infrastructure-related damage and loss. (See Section 3.16.2.7, *Post-Wildfire Hazards* for more information.)

Table 3.16-1 lists the major wildfires affecting unincorporated areas in the county from 1955 to 2021. In recent years, the Paint (1990), Tea (2008), Jesusita (2009), Thomas (2017), and Cave (2019) fires have threatened urban communities on the South Coast, including the Eastern Goleta Valley and Carpinteria Valley. In the North County, the 2016 Canyon Fire threatened the City of Lompoc, and the unincorporated community of Mission Hills was threatened by the 2017 Rucker Fire. In the rural community of Tepusquet, numerous homes were burned by the 2017 Alamo Fire.

Table 3.16-1. Major Wildfires in Santa Barbara County

Year	Fire Name	Acres Burned	Year	Fire Name	Acres Burned
1955	Refugio	79,428	2009	Jesusita	8,733
1964	Coyote	65,338	2009	La Brea	91,622
1971	Romero	14,538	2013	White	1,984
1977	Sycamore	806	2016	Canyon	12,518
1977	Honda	10,000	2016	Rey	33,606
1985	Wheeler	119,361	2016	Sherpa	7,474
1990	Paint	4,270	2017	Alamo Fire	28,687
1993	Marre	43,822	2017	Whittier Fire	18,430
2004	Gaviota	7,440	2017	Thomas Fire	281,893
2006	Perkins	14,988	2018	Holiday	113
2007	Zaca	240,207	2019	Cave Fire	3,126
2008	Gap	9,443	2021	Alisal	16,953
2008	Tea	1,940			

Notes: A number of these fires, such as the Thomas Fire, burned in other counties as well (e.g., Ventura County), so acreages burned in Santa Barbara County are not representative of the true size of the fire. To provide a clearer picture of the extent of damage caused by these fires, the *total* acreages burned (including other counties) are used in this table.
Source: SBCFD 2023.

3.16.2.3 Fire Hazard Severity Zones

CAL FIRE has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). These maps classify Fire Hazard Severity Zones (FHSZ) in State Responsibility Areas (SRAs) based on a hazard scoring system. SRAs are lands where CAL FIRE is typically responsible for wildland fire protection; however, in Santa Barbara County SRA fire protection is provided by SBCFD under contract with CAL FIRE. As a contract county, SBCFD protects 670,677 acres of SRA. In return for this service, CAL FIRE provides funding for services including wages of suppression crews, maintenance of firefighting facilities, fire prevention assistants, pre-fire management positions, dispatch, capital improvements, and administrative services. The Department's budget also provides for expanded firefighting needs when fires grow beyond the initial attack. The majority of the county is located within an SRA.

The hazard scoring system considers criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where an urban conflagration could result in catastrophic losses. The "Very High" FHSZ represents the greatest threat of wildfire hazards and occurs largely in

rural areas along the Santa Ynez Mountains and LPNF and extends into or near urban communities along the South Coast, including Eastern Goleta Valley and Carpinteria Valley, and in the northern areas of Lompoc, including Mission Hills and Vandenberg Village. The "High" FHSZ occurs throughout much of the non-mountainous rural areas of the Lompoc Valley, Santa Ynez Valley, and southern Santa Maria Valley. The High FHSZ within the SRA borders or overlaps many unincorporated communities, including Orcutt, Garey, Sisquoc, Los Alamos, Santa Ynez, Los Olivos, Vandenberg Village, Mission Hills, and Casmalia (Figure 3.16-1).

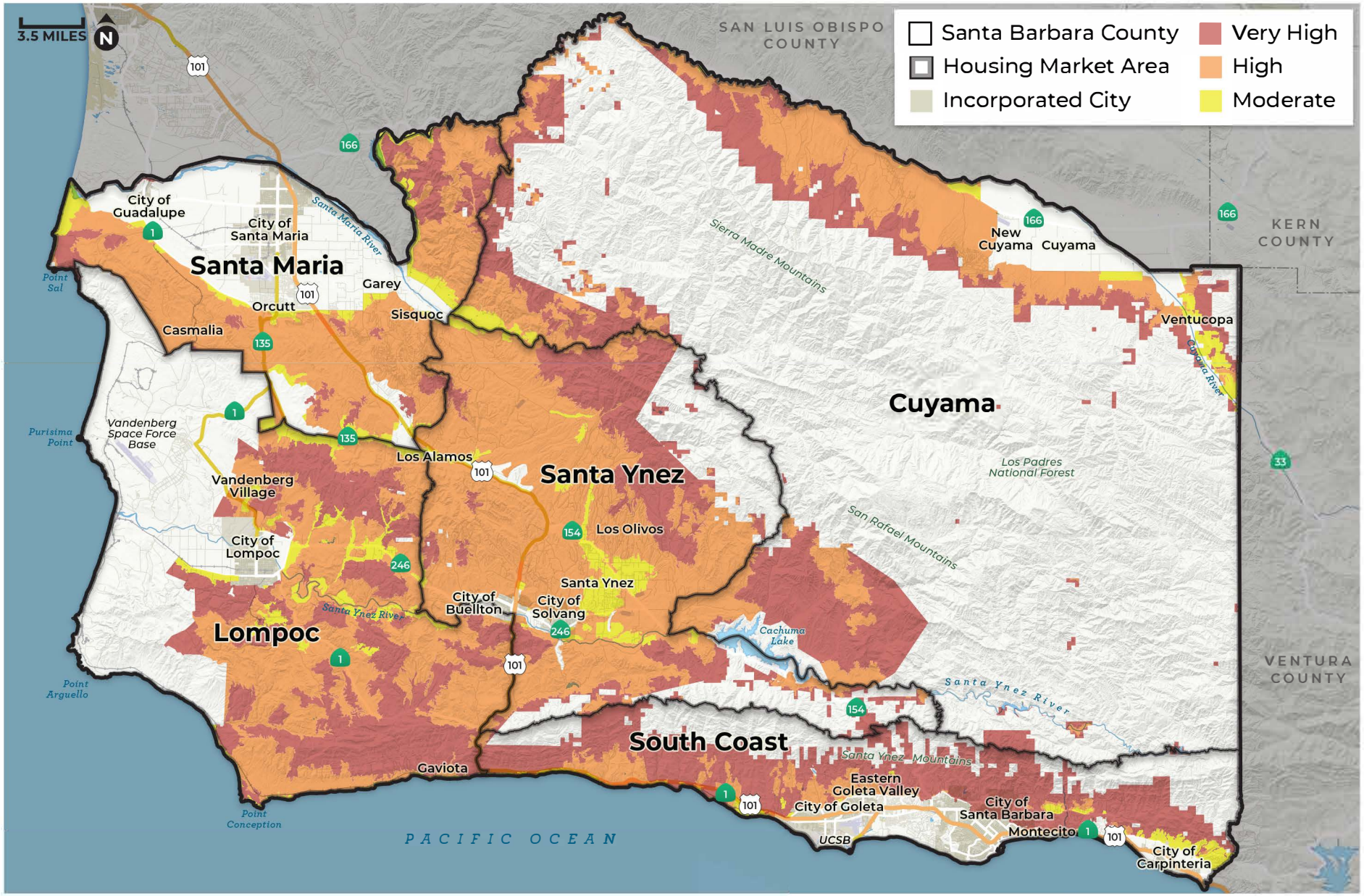
Some areas within the county, including lands within incorporated city boundaries or under federal ownership, are not designated as SRAs. These include several incorporated cities as well as the unincorporated communities of Orcutt, Garey, Sisquoc, Los Alamos, Cuyama, New Cuyama, Carpinteria, Summerland, Montecito, Isla Vista, and Eastern Goleta Valley. These areas are designated as Local Responsibility Areas (LRAs), where local governments have financial responsibility for wildland fire protection. In these areas, SBCFD and other local fire departments serve as the primary responders for fire protection. Within Santa Barbara County, Very High FHSZs within LRAs are designated by the LRA consistent with Government Code Section 51179 for parts of Mission Hills in the North County and Mission Canyon, Santa Barbara, Montecito, and Summerland in the South Coast (Figure 3.16-1).

3.16.2.4 Wildland-Urban Interface and Communities at Risk

The county supports large areas that are exposed to high wildland fire hazards in the WUI between wildland vegetation and adjacent urban development (Figure 3.16-2). According to the National Fire Plan issued by the U.S. Department of Agriculture (USDA) Forest Service and the Department of the Interior, the WUI is defined as "…the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels." In WUI fires, the fire is fueled primarily by naturally occurring vegetation in the wildland and urban areas, as well as by the urban structural elements themselves. WUIs can be identified by the Influence Zone, where vegetation is susceptible to wildfire, and the Interface Zone, where dense housing adjacent to vegetation can burn in a wildfire.

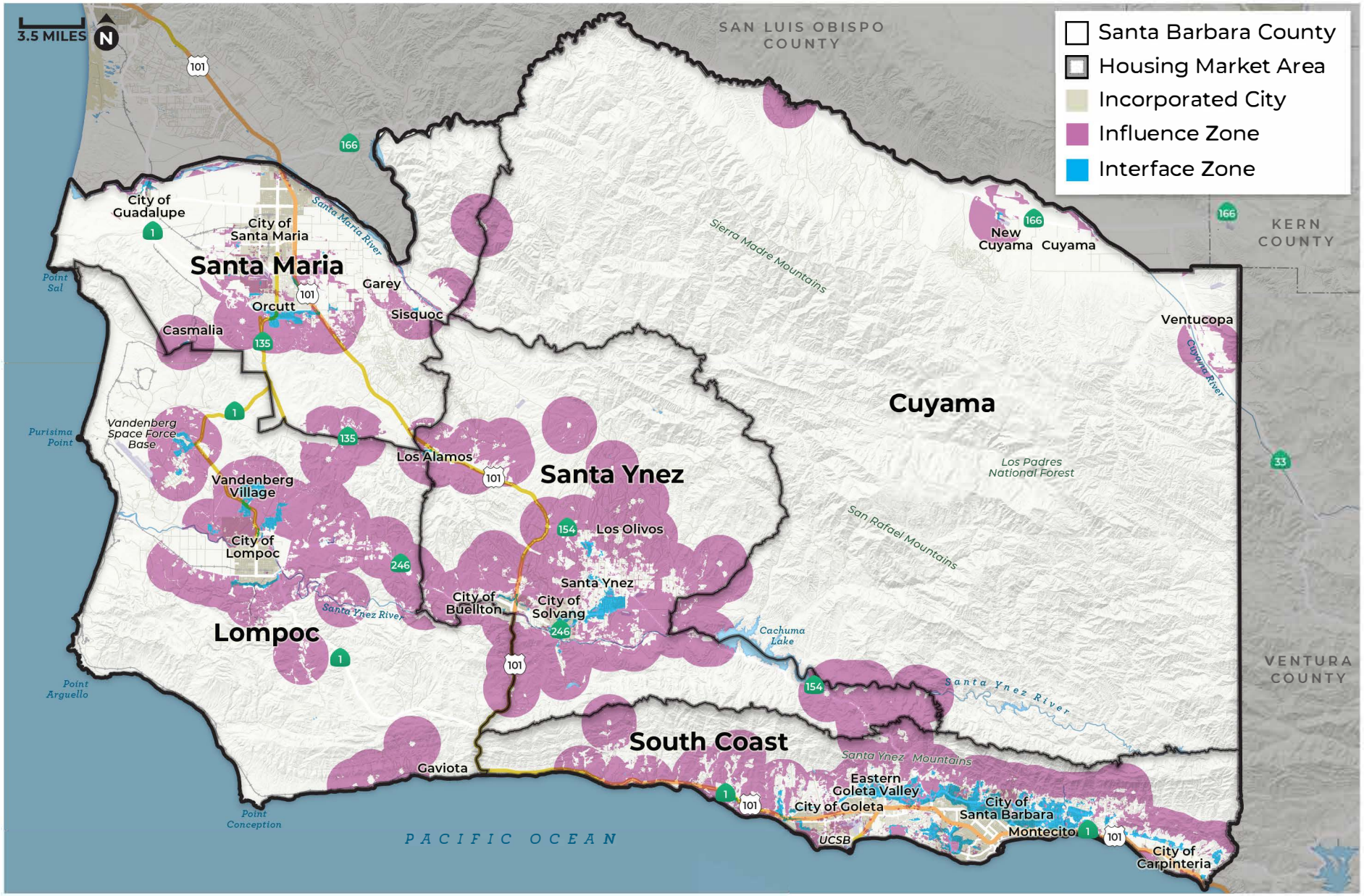


As demonstrated by the 1990 Paint Fire, a combination of vegetation, topography, and climatic conditions, such as high winds and extreme heat can create wildfire risks for life and structures in the WUI.
Source: Edhat.com



Santa Barbara County Fire Hazard Severity Zones

FIGURE 3.16-1



wsp

Santa Barbara County Wildland-Urban Interface

FIGURE 3.16-2

The CAL FIRE FRAP has developed WUI mapping that displays the relative risk from wildfire to areas of significant population density. The WUI data is created by intersecting residential housing unit density with proximate fire threat to give a relative measure of potential loss of structures and threats to public safety from wildfire. Within the county, these areas are often concentrated, developed single-family neighborhoods and some multifamily developments within or immediately adjacent to the foothills of the Santa Ynez Mountains in the unincorporated communities of Eastern Goleta Valley, Mission Canyon, Montecito, Summerland, and Toro Canyon in the South Coast, and Vandenberg Village, Mission Hills, Los Olivos, Santa Ynez, Los Alamos, and the southern portion of Orcutt in the Solomon Hills in North County (Figure 3.16-2; SBCOEM 2022). In particular, in the unincorporated communities on the South Coast, WUIs have experienced repeated wildfires sometimes burning deep into the urban areas and destroying hundreds of homes. This occurred during several recent wildfires in Santa Barbara County, such as the Paint (1990) and Jesusita (2009) fires (Section 3.16.2.2, *Historic Wildfires in Santa Barbara County*).

The FRAP has also developed a Communities at Risk from Wildfire Map, which generally identifies communities that are identified as having some lands at high risk of house/structure damage from wildfire. These high-risk communities are within the WUI, the area where homes are within 0.5 to 1.5 miles of areas of High or Very High FHSZ. There are 25 communities on the Communities at Risk List in Santa Barbara County (CAL FIRE 2019). SBCFD also identifies an additional 16 neighborhoods or small communities at risk of wildfire (SBCFD 2021). Together, these lists represent nearly every unincorporated and incorporated community in the county. Communities on FRAP's List that are of particular relevance to the proposed Project due to the presence of potential housing sites are Eastern Goleta Valley and unincorporated areas of Carpinteria in the South Coast as well as Orcutt, Vandenberg Village, Mission Hills, and Santa Ynez in North County. Notably, New Cuyama is not on CAL FIRE's Communities at Risk list.

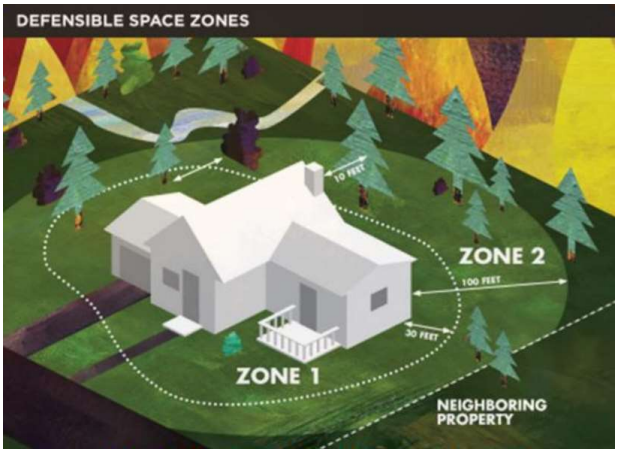
3.16.2.5 Wildfire Management and Firefighting Strategies

When a wildfire occurs, an important factor for life, property, and the environment comes from passive protection measures, such as defensible space (i.e., vegetation clearance around structures), fire-resistant landscaping, and fire-resistant construction. The sum effect of passive protection measures substantially increases the effectiveness of fire suppression activities. Inadequate water supply, ingress and egress access, structural safeguards, and vegetation management are key factors that lead to major structural-related fire losses in areas adjacent to wildlands (Cohen 1999). In addition, the inability of residents to shelter in place can also create evacuation and fire department access problems in these areas (U.S. Forest Service [USFS] 2000).

Typical strategies for managing wildland fire hazards involve three parts: ongoing fuel management, fuel reduction near structures, and suppression of active fires. Fuel management includes the ongoing removal of dried vegetation, the creation of fuel breaks where vegetation is managed to slow or control a fire, and conducting prescribed burns, mainly in open spaces (County of Santa Barbara 2015). Fuel modification reduces a wildfire's intensity, which results in reduced generation of radiant and convective heat generated by wildfire and provides valuable defensible space for firefighters to take an effective stand against an approaching wildfire front and firebrands (i.e., ember showers).

The SBCFD maintains a Defensible Space Program that includes the creation of defensible space, defined as "…the area surrounding a structure or building where basic wildfire protection practices are implemented, providing the key point of defense from an approaching wildfire, or escaping

structure fire. The area is characterized by the establishment and maintenance of fuel modification measures." In fire hazard zones, clearance from all structures shall not be less than 100 feet using surface measurements. Within the 100-foot perimeter, all brush, flammable vegetation, or combustible growth shall be modified so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. The Defensible Space Program implements four Defensible Space Zones concentrically around vulnerable structures. Zone 0 requires the removal of all combustible materials within five feet of a structure. Zones 1 and 2 incorporate requirements for vegetation management (e.g., thinning of shrubs and chaparral, selective removal, and limbing) between 5 to 30 feet from a structure, and between 30 and 100 feet from a structure, respectively. Zone 3 addresses access zones and defensible space within 10 feet of roads and driveways. These minimum standards are established to provide reasonable measures for controlling both fire and erosion hazards and to protect lives and property. SBCFD may require greater protection levels in high-danger areas. In special cases where difficult terrain, the danger of erosion, or environmentally sensitive habitat areas make compliance difficult, the requirements can be adjusted to accomplish all goals (SBCOEM 2022; SBCFD 2022). To facilitate the reduction in fuel loads on residences, the Santa Barbara County Fire Safe Council provides free curbside chipping services for residents throughout the South Coast to reduce fire risk and encourage the development of defensible space (Santa Barbara County Fire Safe Council 2023a).



SBCFD implements a Defensible Space Program consistent with CAL FIRE requirements. Defensible Space refers to an area around the perimeter of structures or developments in the wildlands where the flammable vegetation has been modified to reduce the potential for the structure and/or structures to ignite in the event of a wildfire. Clearance from all structures shall not be less than 100 feet using surface measurements. Within the 100-foot perimeter, all brush, flammable vegetation, or combustible growth shall be modified so that a wildfire burning under average weather conditions would be unlikely to ignite the structure.
Source: SBCFD 2023

Several Santa Barbara County communities that live in the WUI and/or high fire zones are working to or have completed Firewise USA certification from the National Fire Protection Association (NFPA). Firewise USA is a free program run by the NFPA that provides a collaborative framework for communities to get organized, identify their wildfire risks, and work together to create a plan to mitigate those risks. The Firewise program has some minimum requirements (e.g., community size of between 8 and 2,500 dwelling units), but primarily provides the framework and allows communities to determine how to meet its requirements. Communities participate in this program and certification voluntarily. Within Santa Barbara County, there are ten Firewise certified communities: Hollister Ranch, Maria Ygnacia Creek, MCA-Upper Mission Canyon Road, MCA-Upper Tunnel Road, Painted Cave, Rancho Santa Rita Estes- Cebada Owners Fire Association, San Antonio Creek, San Marcos Trout Club, Santa Barbara Highlands, and Tecolote Canyon (Santa Barbara County Fire Safe Council 2023b).

Firefighting Resources

Santa Barbara County Fire Department and Mutual Aid Departments

The SBCFD serves a population of approximately 174,268 residents encompassing 2,480 square miles and operates out of 16 stations. The SBCFD is an "all-risk" organization, providing services that range from firefighting, fire prevention and inspection, and rescue to emergency medical care, transportation, and hazardous material and oil spill response and containment. The SBCFD is additionally responsible for enforcing the Defensible Space Program described above. In addition to the 16 stations operated by the SBCFD, nine other fire departments and fire protection agencies within Santa Barbara County provide automatic and mutual aid fire protection services as a result of the Operational Area Mutual Aid Plan (SBCFD 2021). SBCFD strives to attain a 4-minute (plus one minute for turnout) response time or less in urban areas. Response time refers to the time needed for a unit to arrive at the scene and set up the initial equipment. No response time targets have been established for rural areas. In such areas, onsite fire protection systems, such as sprinklers, water storage facilities, and fire hydrants are considered as important as a first response to a fire (County P&D and CH2MHILL 2007). (Refer to Section 3.13, *Public Services and Recreation*, for additional information about SBCFD's capabilities and services.)

California Department of Forestry and Fire Protection (CAL FIRE)

The County is one of six "contract counties" (i.e., Santa Barbara, Ventura, Los Angeles, Orange, Kern, and Marin) that have executed a contract with the State of California to provide wildland fire protection in the SRA.[2] The County has the responsibility as a contract county to implement the 2018 State Strategic Fire Plan for California in the county. As such, the SBCFD functionally operates as a unit of CAL FIRE and is responsible for all Strategic Fire Plan activities within the county (SBCOEM 2022).

Los Padres National Forest (LPNF) / U.S. Forest Service (USFS)

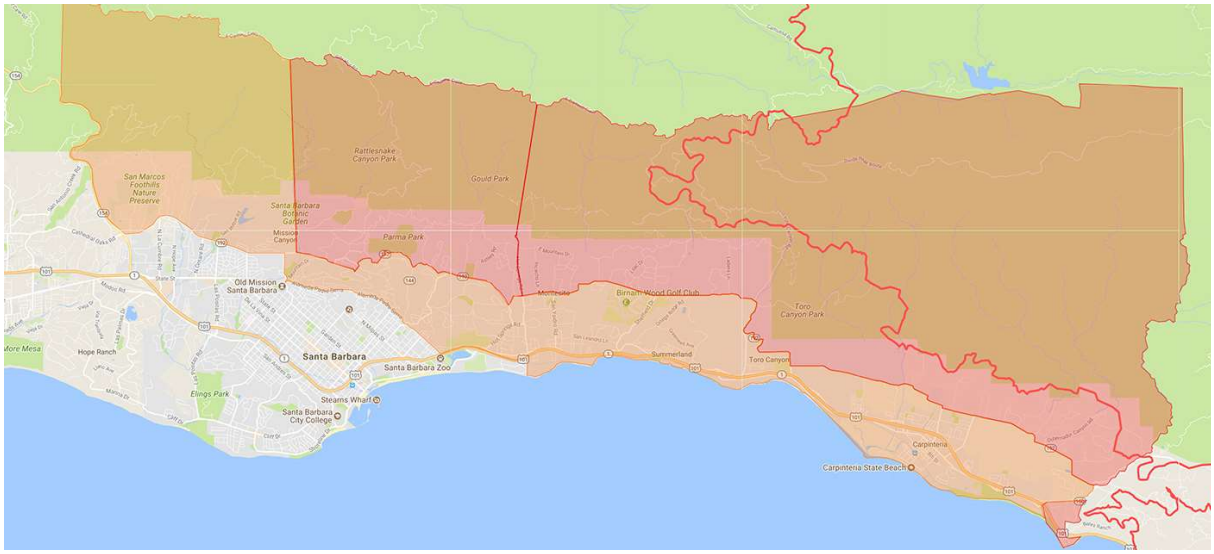
There is a considerable risk of wildfire in the LPNF resulting from a combination of weather, vegetation, terrain, and human use. Intense wildfires, fed by the accumulation of dead and dry vegetation, cause substantial resource damage and are difficult and expensive to suppress. Wildfires burned more than 2.3 million acres in the LPNF since 1912, for a historic average of 25,000 acres per year (USFS 2022). The LPNF is divided into five ranger districts. The Santa Barbara Ranger District has six engines, one hotshot crew, three fire prevention patrols, one helicopter, one water tender, and two dozers. The other four ranger districts – including the Santa Lucia Ranger District located in Santa Maria – have a similar mix of assets and coordinate with each other for wildfire response and resource sharing, as needed (USFS 2023).

3.16.2.6 Evacuation and Emergency Response

The County does not prescribe fixed emergency evacuation routes for wildfire events due to the variability and transformative nature of wildfires (County of Santa Barbara 2015). The SBCFD

[2] The SRA is the area in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which CAL FIRE (and contract counties, such as Santa Barbara County and SBCFD) provides a basic level of wildland fire prevention and protection services. Public Resource Code (PRC) Section 4126 classifies lands that are state and privately-owned forest, watershed, and rangeland as SRA. Lands within city boundaries or in federal ownership are not in the SRA.

maintains Standard Operating Procedures (SOPs) that outline the protocols for fire-induced evacuations based on individual emergency scenarios. During wildfire emergencies in LRAs and SRAs, as a contract county, SBCFD is responsible for assessing hazard areas to identify evacuation requirements, and coordinating with other Santa Barbara County agencies and departments to ensure that residents are evacuated as necessary. Evacuations may either be mandatory or voluntary. Past wildfires demonstrate that evacuations may be required for the South Coast Urban Area in the WUI during wildfires in the Santa Ynez Mountains. Large-scale evacuations are less foreseeable in parts of the North County due to the smaller and more dispersed nature of communities and associated populations. At a countywide level, law enforcement agencies, including the County Sheriff's Office, the California Highway Patrol, and local police departments, are responsible for implementing emergency evacuations.



Mandatory and voluntary evacuation orders are issued in response to each specific wildfire in Santa Barbara County. As demonstrated by past fires, such as the 2017 Thomas Fire (pictured), evacuation orders can extend throughout the WUI in the South Coast, including northern neighborhoods along Foothill Road/SR 192 and into coastal communities in Carpinteria Valley, Santa Barbara, and Eastern Goleta Valley. Source: Santa Barbara Independent

In the event of a large-scale wildfire, SBCOEM may implement the Santa Barbara County Operational Area Multi-Hazard Functional Plan (MHFP), which outlines protocols for emergency planning, management, and response for the county operational area. Additionally, SBCOEM may activate the Santa Barbara County Emergency Operations Center (EOC) to coordinate multi-agency emergency response efforts for a wildfire event in compliance with the State Standardized Emergency Management System (SEMS) protocols. The EOC provides the centralized emergency management that is needed during an emergency or disaster. When activated, representatives from local governmental departments report to the EOC to coordinate local decision-making, simultaneously coordinate department activities, and liaison with different levels of government as well as with private entities. The EOC provides a centralized focus of authority and information and allows for face-to-face coordination among personnel who must set priorities for the use of resources and evaluate the need to request mutual aid. Finally, SBCOEM manages an alert system (Ready Santa Barbara County [ReadySBC]) to notify county residents in the event of a disaster, including wildfires. The use of these plans and protocols is critical in administering numerous aspects of emergency response, including evacuations across the county (SBCOEM 2023).

Egress options are limited for populated areas of the South Coast. For most of the South Coast, including the communities of Goleta, Eastern Goleta Valley, Santa Barbara, Montecito, Summerland, Mission Canyon, Toro Canyon, and Carpinteria, the primary evacuation egress route is north or south on U.S. Highway 101. State Route (SR) 154 may also provide an evacuation route out of Santa Barbara. Communities in the North County also utilize U.S. Highway 101 to evacuate north, towards San Luis Obispo County, or south towards the South Coast. SR 1 can also serve as an evacuation route, as it extends north from Gaviota through the City of Lompoc, and eventually into San Luis Obispo County as well. SR 246, which extends between Lompoc and the Santa Ynez Valley, is critical to connecting communities within the Lompoc Valley and Santa Ynez Valley and with U.S. Highway 101, SR 1, and SR 154. For example, during the Alisal Fire in 2021, which closed U.S. Highway 101 along the Gaviota Coast, drivers detoured from U.S. Highway 101 in the North County and used SR 246 to reach SR 154, which circumvented the fire to connect to the South Coast (Caltrans 2019). In general, emergency access and evacuation can be constrained in hillside neighborhoods and rural communities where limited ingress and egress can slow and prevent the efficient movement of people and vehicles. This is particularly true in denser communities with larger populations served by narrow local roads, such as the City of Santa Barbara, the Goleta foothills, and areas of the Santa Ynez Valley and Orcutt (SBCOEM 2022). Further, in most cases, the same roads used for civilian evacuation to leave an area are also used by emergency responders to access the incident area causing significant congestion and delays for both emergency responders and evacuees.

3.16.2.7 Post-Wildfire Hazards

Mudflow and Debris Flow

Mudflows are flows or rivers of liquid mud down a hillside on the surface of normally dry land. They occur when water saturates the ground, usually following long and heavy rainfalls or rapid snowmelt. To be considered a mudflow, more than half of the particles must be sand-sized or smaller and can flow very rapidly. A mudflow is the sandy, more water-saturated analog of a debris flow (Colorado Geological Survey 2021).



Mud and debris deposited outside the Montecito Inn along Olive Mill Road in Montecito, California after a major storm hit the Thomas Fire burn area on January 9, 2018, resulting in a debris flow.
Source: LA Times via Getty Images

Debris flows are similar to mudflows but are classified as a separate hazard. A debris flow is a soil flow where the majority of the materials are coarse-grained (fine sand to boulder-sized particles) and non-cohesive (SBCOEM 2022). It is a fast-moving slurry of water, rock, soil, vegetation, and even boulders and trees. The rainy season increases the possibility of flash floods and debris flows, especially on slopes burned by recent wildfires where severely burned soils become water-repellent, as well as at drainage corridors (SBCOEM 2022). Debris flows are triggered by short, intense periods of rainfall following a period of less intense precipitation, and can cause property damage and loss of life, damage ecosystems, clog drainage conduits, and close transportation corridors (California Department of Conservation 2019). Given the county's topography, areas susceptible to mudflows and debris flow hazards are present throughout the county at the base of

hillsides and drainages, and the extent of susceptible areas varies widely. Lowland areas of the county are prone to impacts from mudflows and debris flows as sediment, water, and debris slide down slopes towards these areas (SBCOEM 2022).

The county has a high-risk level and a history of significant debris flow events. Most notably, in January 2018, a debris flow in the area of Montecito burned by the Thomas fire caused 23 fatalities, damaged or destroyed more than 500 structures and seven bridges, and shut down U.S. Highway 101 for two weeks. California Geological Survey scientists estimate the Montecito debris flows were up to 30 feet deep, traveled at speeds of 10 to 15 miles per hour, and were capable of carrying boulders as large as a tow truck (California Department of Conservation 2019).

Post-wildfire debris flows remain a significant risk to communities in Santa Barbara County where recent wildfires have occurred. Working in collaboration with the SBCFD, County Public Works Department staff identifies areas of flood and landslide vulnerability related to post-wildfire conditions and develops and implements projects designed to mitigate flood and landslide hazards. However, it is important to note that although mapped hazard areas depict known extents and locations of mudflows and debris flows, they may occur countywide where heavy rain occurs on steep, exposed slopes, particularly following wildfires; therefore, the full extent of debris flow risk cannot be accurately depicted. Flood and debris flow mitigation projects include but are not limited to: drainage crossing debris maintenance, control of storm runoff in burn areas, and revegetation of burn areas.

3.16.3 Regulatory Setting

State and local regulations have been enacted to address wildfire risks and hazards in the wildfire-prone areas of Santa Barbara County. There are no federal regulations that pertain to wildfire hazards or response. Federal regulations that apply to fire protection services are provided in Section 3.13, *Public Services and Recreation*.

3.16.3.1 State

California Department of Forestry and Fire Protection (CAL FIRE)

CAL FIRE serves and safeguards the people and protects the property and resources of over 31 million acres of California's privately owned wildlands within the SRA. CAL FIRE's mission emphasizes the management and protection of California's natural resources; a goal that is accomplished through ongoing assessment and study of the state's natural resources and FRAP. CAL FIRE foresters and fire personnel work closely with other agencies to encourage and implement fuel management projects to reduce the threat of uncontrolled wildfires. CAL FIRE provides varied emergency services to 36 counties via contracts with local governments. CAL FIRE's Fire Prevention Program consists of multiple activities, including wildland pre-fire engineering, vegetation management, fire planning, education, and law enforcement. Typical CAL FIRE prevention projects include brush clearance, prescribed fires, defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping, and fire-related law enforcement activities.

California Fire Code (CFC)

The California Fire Code (CFC) is Part 9 of thirteen parts of the official building regulations to the California Code of Regulations. This code is also referred to as Title 24, or the California Building Standards Code. The CFC establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC applies to the construction – including the presence of fire service features and fire apparatus access roads – alteration, movement, enlargement, replacement, repair, equipment, use, occupancy, means of egress, evacuation plans, location, maintenance, and demolition and removal of every building or structure or any appurtenances connected or attached to such building structures throughout the state. The CFC is administered by the Santa Barbara County Building and Safety Division.

California Fire Plan

The California Fire Plan (2018) is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. The plan serves as the state's road map for reducing the risk of wildfire by emphasizing preventive action before a fire starts. The Fire Plan reduces firefighting costs and property losses, increases firefighter safety, and contributes to ecosystem health. Eight goals outlined by the Fire Plan include:

1. Identify and evaluate wildland fire hazards and facilitate the collaborative development and sharing of such analyses and data collection.
2. Promote and support local land use planning processes as they relate to protection from wildfire and landowner responsibility.
3. Support and participate in the collaborative development and implementation of local, county, and regional plans that address fire protection and landowner objectives.
4. Increase fire prevention awareness, knowledge, and actions implemented by individuals and communities to reduce human loss, property damage, and impacts on natural resources from wildland fires.
5. Integrate fire and fuels management practices with landowner/land manager priorities across jurisdictions.
6. Determine the level of resources necessary to effectively identify, plan, and implement fire prevention using adaptive management strategies.
7. Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.
8. Implement post-fire assessments and programs for the protection of life, property, and natural resource recovery.

2022 California Building Code (CBC)

Building standards for high-fire hazard areas are identified in the California Building Code (CBC), which is administered by the Santa Barbara County Building and Safety Division, in addition to the CFC. Chapters 6-9 of the CBC establish standard building fire prevention systems, fire and smoke protection features, interior finishes, and fire protection and life safety systems. Chapter 49

establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within SRAs or any WUI Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses.

California Health and Safety Code Section 13000 et seq.

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

California Residential Code Chapter 3 Building Planning, Section R337 Material and Construction Methods for Exterior Wildfire Exposure

This section establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within SRAs or any WUI Fire Area to resist the intrusion of flame or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses.

California State Multi-Hazard Mitigation Plan (SHMP)

The purpose of the State Multi-Hazard Mitigation Plan (SHMP) is to significantly reduce deaths, injuries, and other losses attributed to natural- and human-caused hazards in California. The SHMP guides hazard mitigation activities, emphasizing partnerships among local, state, and federal agencies, as well as the private sector (Governor's Office of Emergency Services 2018).

Office of Planning and Research (OPR) Fire Hazard Planning Technical Advisory

The OPR's technical advisory provides context relating to wildfire risk and environmental and regulatory settings, as well as general planning guidance. Guidance topics include outreach and engagement, fire hazard and risk assessment, policy development, and example policies (OPR 2022). The goal of the technical advisory is to provide a robust planning framework for addressing fire hazards, reducing risk, and increasing resilience across California's diverse communities and landscapes. To accomplish this goal, local agencies (i.e., cities and counties) must develop and incorporate effective policies and implementation programs in their general plans and integrate their general plans with other relevant hazard and risk reduction policies, plans, and programs. This technical advisory guides those policies and programs and is also intended to assist city and county planners in discussions with professionals from fire hazard prevention and mitigation, disaster preparedness, and emergency response and recovery agencies.

Government Code Section 51175 – 51189 and Section 66474.02

Government Code Section 51175-51189 designates responsibility to local agencies to identify areas in the state as Very High FHSZ falling under local protection with the LRA. Classification of Very High FHSZ must be consistent with statewide criteria. Designation of Very High FHSZ is based on fuel loading, slope, weather, and other relevant factors, including winds identified as causing wildfire

spread. Once identified, information on Very High FHSZ is mapped and made available to the public. The CAL FIRE director periodically reviews the LRA, and as necessary, makes recommendations relative to the designated Very High FHSZ. This section also outlines brush clearance and defensible space maintenance for buildings in the FHSZ, as well as the necessary permit process for building construction and reconstruction. CAL FIRE guides fuel management and defensible space requirements.

In 2012, Senate Bill (SB) 1241 added Section 66474.02 to Title 7 Division 2 of the Government Code, commonly known as the Subdivision Map Act. The statute prohibits subdivision of parcels designated within Very High FHSZ or that lie in the SRA unless certain findings are made before approval of the tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are, in brief: 1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in the Public Resource Code (PRC) Section 4290-91; 2) structural fire protection services will be available for the subdivision through a publicly funded entity; and 3) ingress and egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

Public Resource Code

PRC Section 4119 authorizes USFS, the U.S. Department of the Interior, Bureau of Land Management, and CAL FIRE to inspect properties to determine whether they comply with state forest and fire laws, regulations, or use permits.

PRC Sections 4201-4204 direct CAL FIRE to map areas of significant fire hazards within SRAs. Classification is based on fuels, terrain, weather, and other relevant factors, and falls under either Moderate, High, or Very High. The director of CAL FIRE is required to designate, review, and revise, as necessary, FHSZs and assign to each zone a rating reflecting the degree of fire hazard severity expected to prevail in the zone.

PRC Section 4290 requires the adoption of minimum fire safety standards related to defensible space that apply to SRA lands under the authority of CAL FIRE and to lands classified and designated as Very High FHSZ. These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within SRAs approved after January 1, 1991, and within lands classified and designated as Very High FHSZ after July 1, 2021. The regulations shall include all of the following:

1. Road standards for fire equipment access.
2. Standards for signs identifying streets, roads, and buildings.
3. Minimum private water supply reserves for emergency fire use.
4. Fuel breaks and greenbelts.

PRC Section 4291 requires a person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material to maintain defensible space of 100 feet (or up to the property line, whichever is less) from each side and the front and rear of the structure. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. Here, "fuel" means any combustible material, including petroleum-based products and wildland fuels. The intensity of fuel management may vary

within the 100-foot perimeter of the structure, the most intense being within the first 30 feet around the structure. A greater distance may be required by state law or local ordinances, program standards, rules, or regulations. Clearance beyond the property line may only be required if the state law or local ordinances, program standards, rules, or regulations include findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. Clearance on the adjacent property shall only be conducted following written consent by the adjacent landowner. This section does not apply to single specimens of trees or other vegetation that are well-pruned and maintained to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation.

PRC Section 4427 limits the use of any motor, engine, boiler, stationary equipment, welding equipment, cutting torches, tar pots, or grinding devices from which a spark, fire, or flame may originate when the equipment is located on or near land covered by forest, brush, or grass. Before such equipment may be used, all flammable material, including snags, must be cleared away from the area around such operation for a distance of 10 feet. A serviceable round point shovel with an overall length of not less than 46 inches and a backpack pump water-type fire extinguisher, fully equipped and ready for use, must be maintained in the immediate area during the operation.

Under PRC Section 4741, per policies established by the State Board of Forestry and Fire Protection, CAL FIRE shall assist local governments in preventing future wildland fire and vegetation management problems by making its wildland fire prevention and vegetation management expertise available to local governments to the extent possible within the department's budgetary limitations. CAL FIRE recommendations shall be advisory in nature and local governments shall not be required to follow such recommendations.

3.16.3.2 Local

County Code of Ordinances

Chapter 10 – County Building Code

Chapter 10 of the County's Code of Ordinances is the Santa Barbara County Building Code (Ord. No. 4822, 1-17-2012). The code addresses geological, topographical, and climatic conditions in the county, including extreme weather conditions, firefighting resources, flammable vegetation, High Hazard Areas, extreme wind conditions, and seismic shaking, and the minimum standards to safeguard and protect life, buildings, and structures within the county. Per the County's Building Code Construction Standards, residential development within designated high-fire hazard areas must abide by specific construction standards. Where appropriate, all of the required structural safeguards must be graphically depicted on building plans submitted before issuance of a building permit. The safeguards must be inspected and approved by SBCFD inspectors before occupancy.

Chapter 15 – Fire Prevention / Fire Code

Chapter 15 of the County's Code of Ordinances (Ord. No. 5170, 12-6-2022) is titled *Fire Prevention* and serves as the County's Fire Code. This ordinance incorporates the CFC by reference and, as a result, implements the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing

buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations.

This chapter of the County's Code of Ordinances includes development standards developed by the SBCFD Fire Protection District to provide for and maintain adequate and unobstructed emergency access for fire department apparatus and personnel to buildings, structures, hazardous occupancies, or other premises. The standards apply to newly proposed private roads and driveways that are used to provide access to dwellings and structures for emergency access. They include requirements for minimum roadway width, turnarounds, fire access, vegetation clearing around roadways to be used for firefighting access purposes and building and construction standards. The standards also provide limitations for the maximum length of dead-end-roads allowable, defensible space requirements, and automatic sprinkler systems, among others. Multifamily development projects may have additional access requirements beyond what is included in this standard.

The County's Code of Ordinances also includes an impact mitigation fee for new development projects within the SBCFD service area. To mitigate impacts caused by new development projects within SBCFD's service area, a fire facility, apparatus, and equipment development impact mitigation fee may be necessary. The fee is needed to finance fire facilities, apparatus, and equipment necessary to serve new development and to assure new development projects pay their fair share for these facilities. These fees are outlined in the County's Development Impact Mitigation Fee Program and are required to be paid on or before the final building permit inspection.

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan (inclusive of mandatory and optional Elements) addresses the safety, conservation, development, and use of natural resources, including the risks associated with wildfire and its potential effects. Consistency with these policies is discussed in Section 3.10, *Land Use and Planning*.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979, republished in May 2009, and amended in July 2023) is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards. The following policies from the Seismic Safety and Safety Element (2023) are applicable:

- **Policy FIRE-1.0:** Continue to pursue and promote County fire prevention programs and control measures.
- **Policy FIRE-1.1**: Subdivisions in the Very High Fire Hazard Severity Zone shall provide secondary access where feasible or substantial mitigations and/or management plans are required that offset the known risks, a Wildfire Protection Plan is prepared and approved, and a setback from wildland vegetation determined by the Fire Department, is established as part of the subdivision and is implemented prior to development.
- **Policy FIRE-1.2**: The County will consider risks from hazards when reviewing plans for development and occupancies in High or Very High Fire Hazard Severity Zones and take action to minimize risks to occupants to the greatest extent feasible.

- **Policy FIRE-1.3**: The County shall manage County-owned urban open space facilities to reduce wildfire hazards and associated risks consistent with State and County wildfire regulations and standards.
- **Policy FIRE-1.4**: The County should work with property owners of existing developments that do not conform to contemporary fire safe standards to improve or mitigate access, water supply and fire flow, signing, and vegetation clearance to meet current State and/or locally adopted fire safety standards.
- **Policy FIRE-2.0**: The County shall use California Department of Forestry and Fire Protection-Fire Hazard Severity Zones to determine areas that will require appropriate construction materials for new buildings in State Responsibility Areas and Local Responsibility Areas, local agency Very-High Fire Hazard Severity Zones, and designated Wildland-Urban Interface areas pursuant to the California Code of Regulations Title 24, Part 2, California Building Code.
- **Policy FIRE-2.1**: The County should continue to collaborate with the California Department of Forestry and Fire Protection in the revision of Fire Hazard Severity Zone Maps and shall adopt the official areas of Very High Fire Hazard Severity Zones in the Local and State Responsibility Areas.
- **Policy FIRE-3.0**: The County shall continue to require consistency with County Fire Department Development Standards that ensure adequate defensible space clearance around all structures in compliance with the California Fire Code, Public Resource Code §4291, and Government Code §51175-51188.
- **Policy FIRE-3.1**: New development shall meet or exceed the State Fire Safe Regulations through application of the Fire Code and wildfire development standards pertaining to fuel modification and defensible space.
- **Policy FIRE-3.2**: A Wildfire Protection Plan is required for all new large developments in the Very High Fire Hazard Severity Zone (VHFHSZ), including subdivisions, mixed use development, commercial cannabis activities, multi-family housing, businesses open to the public, and large assembly uses and/or events. Such uses may require a Wildfire Protection Plan in the High FHSZ, at the discretion of the Fire Marshal.
- **Policy FIRE-3.3**: When a Wildfire Protection Plan is required, it shall include measures for modifying fuel loading, a maintenance plan to ensure measures are maintained, and a site plan with locations of any roads or existing structures that may act as a fuel barrier in a configuration that will maximize their benefit as a fuel barrier/fire break to the proposed development.
- **Policy FIRE-3.4**: Santa Barbara County Fire Department shall continue to implement the Vegetation Management Program through implementation of its Unit Strategic Fire Plan and maintained in CalMapper, providing long-term maintenance of fire hazard reduction projects to mitigate risks to existing development and communities.
- **Policy FIRE-3.5**: Communities within Santa Barbara County are encouraged to prepare Community Wildfire Protection Plans to identify and prioritize areas for hazardous fuel reduction treatments, describe methods to reduce structure ignitability, and methods of fuel treatment that protect essential infrastructure.
- **Policy FIRE-3.6**: To reduce the potential for fire damage, the County shall continue to require consistency with County Fire Department Development Standards pursuant to the California

Fire Code, Public Resource Code §4291, and Government Code §51175-51188, as may be amended.

- **Policy FIRE-4.0**: The County shall strive to maintain partnerships with tribal governments, state, local, and federal agencies to identify, prioritize, and implement fire prevention and protection measures in the County.
- **Policy FIRE-4.1**: The County Office of Emergency Management (OEM) shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.
- **Policy FIRE-4.2**: The County's Safety Element should continue to reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan in order to consider measures to reduce potential harm from fire-related activity to property and lives.
- **Policy FIRE-4.3**: The County's fire districts will update and implement the Santa Barbara County Mutual Aid Plan each year to establish a plan for interagency preparedness, coordination, automatic aid, and mutual aid.
- **Policy FIRE-5.0**: New development in the State Responsibility Areas and Very High Fire Hazard Severity Zone shall meet or exceed State Fire Safe Regulations, as may be amended, relating to roads, water, signing and fuel modification; and Fire Hazard Reduction Around Buildings and Structures Regulations relating to fuel modification (Title 14, California Code of Regulations 1299.01-1299.05), as may be amended.
- **Policy FIRE-5.1**: New development within the State Responsibility Area, Very High Fire Hazard Severity Zones, and County High Fire Hazard Area will meet or exceed State standards set forth in the County Fire Code and County Building Code, Chapter 7A Materials and Construction Methods for Exterior Wildfire Exposure, as may be amended.
- **Policy FIRE-5.2**: The County will continue to evaluate non-conforming development and apply contemporary road standards consistent with the State Fire Safe Regulations through the development review process.
- **Policy FIRE-5.3**: All new development shall meet requirements identified in the State Fire Safe Regulations, National Fire Protection Association Standard 1142 on water supplies for suburban and rural firefighting, State Fire Code, and local Fire District Development Standards for hydrant spacing, water flow rates for fire suppression, and stored water for water and fire protection systems.
- **Policy FIRE-5.4**: New development in the State Responsibility Area and Very High Fire Hazard Severity Zone will meet or exceed the requirements in the State Fire Code and Fire Safe Regulations, which include visible home and street addressing and signage, evacuation and emergency vehicle access, and vegetation clearance maintenance on public and private roads that ensure adequate evacuation and emergency vehicle access.
- **Policy FIRE-6.0**: Prohibit the siting of new essential public facilities (including, but not limited to, hospitals and health care facilities, emergency shelters, emergency command centers, and emergency communications facilities) in the Very High Fire Hazard Severity Zone in the Local and State Responsibility Areas, unless all feasible risk reduction measures have been incorporated into project designs or conditions of approval.

- **Policy FIRE-6.1**: The County's fire districts shall continue to review and update Standard of Coverage studies provided for existing and planned new development to ensure there are adequate fire protection services, such as fire stations, equipment, and coverage during emergencies.
- **Policy FIRE-6.2**: The County's fire districts shall periodically prepare or update a Standard of Cover Study to assess future emergency service needs and identify additional resources and services necessary to provide satisfactory emergency response services to meet future needs.
- **Policy FIRE-6.3**: The County's fire districts will continue to train and certify their staff using the California Incident Command Certification System or by the requirements and guidelines set by the State Fire Marshal for training emergency service staff.
- **Policy FIRE-7.0**: The County shall ensure completeness and availability of identified emergency supplies and resources to all segments of the population, focusing especially on vulnerable and disadvantaged communities, including but not limited to temporary shelter or housing, and items such as medical supplies and services, water main repair parts, generators, pumps, sandbags, road clearing, and communication facilities.
- **Policy FIRE-7.1**: The County shall maintain and improve disaster response and recovery capabilities and shall meet the emergency needs of all members of the community, especially the most vulnerable and disadvantaged.
- **Policy FIRE-7.2**: Post-wildfire reconstruction shall conform to the latest applicable Fire and Building Code standards.
- **Policy FIRE-7.3**: The County shall continue to promote outreach programs that educate at-risk populations and the wider community on defensible space, evacuation routes, and other information aimed at mitigating wildfire hazards.
- **Policy FIRE-8.0**: The County shall require new residential subdivisions in the Very High Fire Hazard Severity Zone to provide not less than two means of access for emergency vehicles and resident evacuation. A deviation from this policy is only allowed if substantial mitigations and management plans are put in place to offset the known risks, and when the Fire Chief approves the proposed deviation mitigation and management plans.
- **Policy FIRE-8.1**: All new development in the Very High Fire Hazard Severity Zone VHFHSZ will comply with ingress/egress requirements found in applicable wildfire Development Standards, Fire Code, and the State Fire Safe Regulations.
- **Policy FIRE-9.0**: All new development shall maintain adequate water infrastructure that ensures water supply and flow rates are adequate for fire suppression.
- **Policy FIRE-9.1**: New development, including that which is not supplied by a water purveyor, shall have adequate infrastructure flow rate, and storage onsite that supports long-term water supply.
- **Policy FIRE-9.2**: The County will coordinate with water purveyors to encourage water supply infrastructure upgrades to maintain an adequate, long-term water supply for fire suppression needs for the community.

Community Plans

Community-specific goals and policies for wildfire hazards are provided in several adopted community plans as part of the Comprehensive Plan. Any future housing and associated development within the following community plan areas would be subject to the public safety and wildfire hazard protection and planning goals and policies of that plan (and/or to more stringent goals and policies in other adopted regulatory plans).

- Eastern Goleta Valley Community Plan
- Gaviota Coast Plan
- Goleta Community Plan
- Los Alamos Community Plan
- Mission Canyon Plan
- Montecito Community Plan
- Orcutt Community Plan
- Santa Ynez Community Plan
- Summerland Community Plan
- Toro Canyon Plan

Other Non-Regulatory Plans Addressing Wildfire Hazards

In addition to the County regulations discussed above, various agencies have prepared documents that provide background or guidance on wildfire risks, vulnerabilities, and mitigations. The following plans and programs are not regulatory documents but help to inform policy and management of wildfire hazards and response.

Multi-Jurisdictional Hazard Mitigation Plan (MJHMP)

The Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) was most recently updated by the SBCOEM in 2022 to comprehensively identify, evaluate, and mitigate the known hazards that Santa Barbara County faces. The MJHMP is used by local emergency management teams, decision-makers, and agency staff to implement needed mitigation to address known hazards. The MJHMP can also be used as a tool for all stakeholders to increase community awareness of local hazards and risks and provide information about options and resources available to reduce those risks. The MJHMP describes historical hazard events and the future probability of these hazards and their impact on communities within the county. Vulnerability assessments summarize wildfire hazards' impact on critical infrastructure, populations, and future development. The MJHMP identifies five goals and a Mitigation Plan, including measures to ensure future development is resilient to known hazards, including wildfire (SBCOEM 2022; SBCFD and CAL FIRE 2021).

Standardized Emergency Management System Emergency Management Plan

The SBCOEM developed the Emergency Management Plan (EMP) in June 2003, and updated it in 2013, to ensure life and property safety, security, and protection of, as well as assure the overall well-being of, the population during a disaster. The EMP was developed for the Santa Barbara Operational Area

as part of the SEMS. The EMP addresses emergency responses associated with natural disasters, technological incidents, and national-security emergencies- including both peacetime and wartime nuclear defense operations. The EMP assigns tasks and specifies policies and SOPs for the coordination of emergency staff, resources, and service elements. The Plan states that hazard mitigation is a year-round effort and encourages all communities to prepare hazard mitigation plans. The following activities were identified by the Plan as potential mitigation activities: improving structures and facilities at risk, identifying hazard-prone areas and developing standards for prohibited or restricted use, recovery, and relief from loss (i.e., insurance), and providing hazard warning and protecting the population. The EMP is currently undergoing routine revision and will have the title "Santa Barbara County and Operational Area Emergency Operations Plan (EOP)."

Santa Barbara Operational Area "All Risk" Mutual Aid Plan

The Mutual Aid Plan exists to provide, in an expedient manner, fire, rescue, emergency medical services, hazardous materials, urban search and rescue, or other expertise – in the form of resources and qualified personnel – as would be necessary to manage a major incident or disaster that would exceed the capabilities of a single agency. Santa Barbara County is located in California Mutual Aid Region I, which includes San Luis Obispo, Ventura, Los Angeles, Orange, and Santa Barbara counties. Each county is required to have a Mutual Aid Plan that outlines procedures, policies, resources, and personnel information. This Plan assists local, state, and federal fire agencies in preparing for a major emergency (SBCFD 2005).

Community Wildfire Protection Plans

A Community Wildfire Protection Plan (CWPP) is a planning and funding prioritization tool created by the Healthy Forests and Restoration Act of 2003 as an incentive for communities to engage in comprehensive forest and fire hazard planning and help define and prioritize local implementation and funding needs (USDA n.d.). CWPPs are generally developed by local governments or other entities with assistance from state and federal agencies and in collaboration with other interested partners. This provides communities with an opportunity to influence where and how federal agencies implement fuel reduction projects on federal lands, as well as how additional federal funds may be distributed for projects on non-federal lands. CAL FIRE also provides funding opportunities for projects or activities that may be identified in CWPPs (OPR 2022). Within the unincorporated county, CWPPs have been prepared for Carpinteria-Summerland, San Marcos Pass-Eastern Goleta Valley, Mission Canyon, Montecito, and the Gaviota Coast. These documents offer background and guidance on wildfire risks, prevention, and preparedness, as well as mitigation measures.

Regional Wildfire Mitigation Program

The Regional Wildfire Mitigation Program (RWMP) is a collaboration between many local, regional, and national groups, and aims to foster wildfire resilience across landscapes and communities on the South Coast of Santa Barbara County. This multi-year program is designed to assess vulnerable areas and equitably improve fire safety for residents and properties, decrease the risk of damaging fires to infrastructure, and promote wildfire-resilient green space, working lands, and habitats (Santa Barbara County Fire Safe Council 2023).

2023 Santa Barbara County Unit Strategic Fire Plan

The 2023 Santa Barbara County Unit Strategic Fire Plan is developed with the SBCFD's Mission Statement in mind and intended to serve as a collaborative local planning document. The Santa Barbara County Unit Strategic Fire Plan tiers under the 2018 Strategic Fire Plan for California and the 2022 CAL FIRE Strategic Plan to identify goals and objectives to minimize wildland fire risk to county watersheds, communities, firefighters, the public, and various other local assets. In combination, the three plans recognize wildland fires occur and work to figure out how to live with the risk of wildfire. The Santa Barbara County Unit Strategic Fire Plan utilizes eight specific goals related to wildfire and hazard mitigation.

2021 Climate Change Vulnerability Assessment (CCVA)

The County published its CCVA in November 2021. The CCVA serves as the first step to improving regional resiliency by analyzing how climate change may harm the community. The assessment looks at how severe the effects of climate change hazards are likely to be for the county's people and assets and identifies which groups of people and assets face the greatest potential for harm. The County is using these results to assist in preparing the 2030 Climate Action Plan (CAP), as well as to update the Seismic Safety and Safety Element to increase resiliency throughout the unincorporated county.

2030 Climate Action Plan

The 2030 Climate Action Plan is an initiative that aims to replace and update the County's 2015 Energy & Climate Action Plan, which was sunset in 2020. (Refer to Section 3.7, *Greenhouse Gas Emissions.*) The new 2030 Climate Action Plan will be updated to achieve a 50 percent reduction of communitywide greenhouse gas (GHG) emissions by 2030. The Climate Action Plan will also feature resilience measures in response to likely and imminent climate change impacts, including climate-induced fire hazards, and updated thresholds of significance for local projects. The current phase of the plan is a Draft Climate Action Plan with a review by community stakeholders and public comments. The plan is expected to be adopted in 2024 (County of Santa Barbara and One Climate Initiative 2022).

3.16.4 Environmental Impact Analysis

This section discusses the potential wildfire-related impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.16.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program Environmental Impact Report (EIR), implementation of the proposed Project may have a significant adverse impact relating to wildfire if it would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan;

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Appendix G of the CEQA Guidelines also includes the following threshold of significance for impacts relating to hazards and hazardous materials.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g. Expose people or structures, either directly or indirectly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

As discussed in Section 3.8, *Hazards and Hazardous Materials,* due to the relationship of these thresholds of significance to wildfire hazards, these impacts are discussed in this section of the Program EIR, rather than in Section 3.8, *Hazards and Hazardous Materials*.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2021) does not identify applicable thresholds related to wildfire hazards; therefore, for this analysis, the Program EIR relies upon the County's Initial Study Checklist. Under the Fire Protection section of the County's Initial Study Checklist, the County considers a project's impact on wildfire potentially significant if it would result in:

a) Introduction of development into an existing high-fire hazard area or exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires;

b) Project-caused high fire hazard;

c) Introduction of development into an area without adequate water pressure, fire hydrants, or adequate access for firefighting

d) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;

e) Introduction of development that will substantially impair an adopted emergency response plan, emergency evacuation plan, or fire prevention techniques such as controlled burns or backfiring in high fire hazard areas?

f) Development of structures beyond safe Fire Dept. response time.

Potential impacts associated with threshold (f) of the County's Initial Study Checklist are discussed in Section 3.13, *Public Services and Recreation*. Potential impacts associated with threshold (c), water pressure) of the County's Initial Study Checklist are discussed in Section 3.14, *Utilities and Water Supply.*

Methodology

As described in Chapter 2, *Project Description*, the Housing Element Update identifies potential residential and mixed use developments at specific locations within the county. However, future project-level siting and design details, as well as the timing of future residential development, are not known. Rather, the Housing Element Update establishes several goals, policies, and programs to facilitate the housing development necessary to meet the County's 2023-2031 Regional Housing Needs Allocation (RHNA) plus the 15 percent buffer for lower and moderate-income units. However, it should be noted that as described in Chapter 2, *Project Description*, the County Board of Supervisors would eliminate some sites and select the number of housing sites necessary to accommodate RHNA plus a 15 percent buffer for lower- and moderate-income households. As a result, the impact analysis provided below does not evaluate wildfire risk at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for the Housing Element Update to affect wildfire and post-wildfire risks (e.g., debris flows) within the county, particularly within the WUI. The analysis also addresses the potential programmatic impacts on incident response (including emergency evacuations).

The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This programmatic analysis is supported by the review of existing adopted plans, public databases, and recent studies to assess the potential impacts of wildfire-related hazards. This includes a review of CAL FIRE's FRAP and published FHSZ and WUI maps. This section is derived from the current evaluations and mapping of wildfire hazards by CAL FIRE, the Santa Barbara County MJHMP, and the Santa Barbara Unit Strategic Fire Plan, as well as the Santa Barbara County Comprehensive Plan, associated community plans, and the various CWPPs prepared by local fire departments and the Santa Barbara County Fire Safe Council. Additionally, this section integrates relevant information from the 2021 Connected 2050: Regional Transportation Plan and Sustainable Communities Strategy EIR, the 2017 Cannabis Land Use Ordinance and Licensing Program EIR, the 2016 Gaviota Coast Plan EIR, the 2015 Eastern Goleta Valley Community Plan EIR, and the 2014 Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments EIR.

To evaluate the potential for post-wildfire impacts, such as debris flows, flooding, or slope instability, this section incorporates information regarding the hydrologic setting, as described in Section 3.9, *Hydrology and Water Quality*.

3.16.4.2 Project Impacts

Table 3.16-2 provides a summary of the proposed Project's impacts related to wildfire. A detailed discussion of each impact follows.

Table 3.16-2. Summary of Wildfire Impacts

Wildfire Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact WF-1. The proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, or fire prevention techniques such as controlled burns.	Insignificant	None required	Insignificant impacts
Impact WF-2. The proposed Project would potentially exacerbate wildfire risks and could expose existing or future residents to pollutant concentrations and the uncontrolled spread of wildfire at several sites throughout the county, particularly within the WUI or in High/Very High FHSZs.	Potentially significant	MM WF-1 (Onsite Defensible Space Requirements)	Significant and unavoidable impacts
Impact WF-3. The proposed Project would potentially require the installation or maintenance of associated infrastructure (e.g., fuel breaks and emergency access roads) that may result in temporary or permanent impacts on the environment (e.g., vegetation clearing) and may exacerbate fire risk.	Potentially significant	MM WF-1 (Onsite Defensible Space Requirements)	Significant and unavoidable impacts
Impact WF-4. The proposed Project would not substantially expose people or structures to significant post-wildfire risks, including downslope or downstream flooding or landslides, as a result of runoff, post-wildfire slope instability, or drainage changes.	Insignificant	None required	Insignificant impacts
Cumulative Impacts	Potentially significant	MM WF-1 (Onsite Defensible Space Requirements)	Significant and unavoidable impacts

Impact WF-1. The proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, or fire prevention techniques such as controlled burns.

High and Very High FHSZs and WUI areas within the county have a high risk for wildfire due to the existence of excessive dry vegetation fuel, lack of adequate water for fire suppression, and/or lack of adequate access to firefighting and firefighting equipment. Based on the sites inventory prepared for the Housing Element Update, future residential development would primarily occur in the Urban Area that is located outside of the High/Very High FHSZs and WUI areas. Future residential development would occur near existing communities away from rural areas and open lands where fire prevention techniques such as prescribed burns take place. However, it is foreseeable that future housing developed enabled under the Housing Element Update in the WUI areas on the South Coast, Lompoc, and Santa Maria Housing Market Areas (HMAs) would potentially be vulnerable to wildfire and subject to emergency response plans and evacuation orders. For example, on the South Coast, Rezone Site No. 11 (Glen Annie) is located in the WUI outside the Urban Area, and Rezone Site No. 12 (St. Vincent's East) and No. 13 (St. Vincent's West), are located in the WUI area at the base of the San

Marcos Foothills, an area that has been subject to multiple historic wildfires. In the North County, Rezone Site No. 32 (Fong 1) and No. 33 (Fong 2) are located within the designated WUI area in the Lompoc Valley. Rezones at these locations and others that lie within the WUI could increase the number of residents located within a WUI area, thereby increasing the number of people that could be affected by future evacuation orders and relying upon smaller road corridors for evacuation.

As demonstrated by recent wildfires on the South Coast described in Section 3.16.2.1, *Regional Setting*, evacuation areas during a wildfire can extend to all areas above Foothill Road/SR 192 and in some areas may extend to Hollister Avenue and State Street depending on the location and intensity of the fire and other conditions, such as high winds and high heat. When evacuations are ordered, residents leave affected areas using existing roads and highways. Egress options are the most limited for populated areas of the South Coast that rely on U.S. Highway 101, Foothill Road/SR 192, and SR 154 as primary evacuation routes. Pursuant to SB 99, the County identifies and maps in the Safety Element residential developments that do not have at least two egress options (i.e., single egress residential developments) (County P&D 2023).[3] Residents in single-egress residential developments face greater wildfire hazard risk due to the lack of options for evacuation in the event of a wildfire and the potential for a wildfire to impede access to the sole evacuation route. The county has 70 single-egress residential developments.

As previously described, the County does not designate specific emergency evacuation routes and does not maintain a specific emergency evacuation plan. Emergency response plans and evacuations in the county are meant to be scalable, adaptable, and responsive to specific emergency situations. Because wildfire behavior varies dramatically based on location and conditions, emergency response and evacuation orders are provided in response to each wildfire event to ensure orderly and timely evacuation of potentially affected residents. As described in Section 3.16.2.6, *Evacuation and Emergency Response,* as a contract county, during fire emergencies SBCFD is responsible for assessing hazard areas to identify evacuation requirements, fire prevention, and protection. SBCFD also coordinates with County agencies and departments (e.g., Santa Barbara County Sheriff's Office, SBCOEM) to ensure that residents in SRAs are evacuated, as necessary. At a countywide level, law enforcement agencies including the Sheriff's Department, the California Highway Patrol, and local police departments are responsible for implementing emergency evacuations.

County jurisdictions have established various communication pathways to inform the public of emergencies and recommended protective actions, such as evacuations and sheltering in place. These pathways are frequently used concurrently to amplify emergency information throughout the community and reach vulnerable individuals who may need additional information and resources to take action, including people with disabilities, people with access and functional needs, commuters, and visitors. Emergency notifications are disseminated through phone calls, text messages, email, TeleTYpe/Telecommunications Device for the Deaf (TTY/TTD) (for the deaf and hearing-impaired), Wireless Emergency Alerts (WEAs), and Emergency Alert System (EAS) messages. Notifications may also be delivered directly to residents via door knocks and/or evacuation sirens on law enforcement vehicles. Incident information can also be posted on the County's emergency preparedness website: www.ReadySBC.org, shared on social media platforms (e.g., Twitter and Facebook), through print, radio, and TV media, and accessed through 2-1-1 and Call Center hotlines. ReadySBC is the primary source for information and notifications regarding hazard preparation, current emergencies, and

[3] Single egress residential developments consist of at least 30 lots that share a single road that serves as the sole way out of a hazard area.

recovery. Residents sign up for the ReadySBC Alerts program to receive emergency alerts through the ReadySBC.org website.

It should also be noted that all residential development in the unincorporated county would be subject to the CFC and Chapter 15 of the County's Code of Ordinances, which require adequate and unobstructed emergency access for fire department apparatus and personnel to buildings, structures, hazardous occupancies, or other premises, including at least two routes of ingress and egress to facilitate emergency response and evacuation, as determined appropriate by SBCFD. The standards apply to newly proposed private roads and driveways that are used to provide access to dwellings and structures for emergency access. These regulations ensure new development provides adequate access during a wildfire to allow emergency response and evacuation of the site. Additional potential effects of housing sites in high-risk areas on firefighting resources and other public services are discussed in Section 3.13, *Public Services and Recreation*.

Established and ongoing planning efforts around emergency response and evacuation would consider any future residential growth resulting from the implementation of the Housing Element Update. As a result of future residential growth SBCFD may issue more conservative emergency evacuation orders (e.g., evacuation orders that are provided earlier and extended further); however, any future emergency response or emergency evacuation would be carried out under the existing emergency response plans. Therefore, the proposed Project would not impair an emergency response plan or emergency evacuation plan and impacts would be *insignificant*.

Impact WF-2. The proposed Project would potentially exacerbate wildfire risks and could expose existing or future residents to pollutant concentrations and the uncontrolled spread of wildfire at several sites throughout the county, particularly within the WUI or in High/Very High FHSZs.

Potential future housing sites enabled under the proposed Project would result in the development of housing within or adjacent to High and Very High FHSZ and the designated WUI, particularly within Eastern Goleta Valley, Carpinteria, Orcutt, Mission Hills, and Vandenberg Village. New residential development in these wildfire hazard areas would exacerbate wildfire risks due to existing steep slopes, substantial natural vegetation fuel sources, Santa Ana winds, and "sundowner" winds, where future residents would be exposed to wildfire and related pollution. For example, on the South Coast, Rezone Site Nos. 11 (Glen Annie), 12 (St. Vincent's East), and 13 (St. Vincent's West) are located in the WUI at the base of the Santa Ynez foothills adjacent to undeveloped sloped areas with highly combustible vegetation. In particular, St. Vincent's East is located downslope of the San Marcos Foothills Preserve, which while somewhat buffered to the north by orchards, includes 300 acres of heavily vegetated natural habitats providing a direct fire transmission corridor to the site. In contrast, Glen Annie, while potentially exposed to wildfires originating in the foothills, is more heavily buffered under current conditions by irrigated orchards. In the North County, Rezone Site No. 32 (Fong 1) and No. 33 (Fong 2) are located within the designated WUI with onsite and adjacent fire-prone chaparral vegetation. In the event of a wildfire in the WUI, residents in these areas would be vulnerable to wildfire pollution concentrations and the direct effects of uncontrolled wildfire on life and property.

The sites inventory provided as part of the Housing Element Update indicates where housing development may occur under the proposed Project. Based on geographic information systems (GIS) analysis of the sites inventory relative to the geographic extent of the WUI as mapped by the CAL FIRE FRAP, including both the interface zone and the influence zone (Figure 3.16-2), it is estimated that up to 1,652.2 acres of potential housing sites would be subject to wildfire hazards, including potential

exposure to pollutant concentrations and the direct hazards related to uncontrolled wildfire spread in the WUI (Table 3.16-3). Of the total acreage in the WUI, 717.0 acres (43 percent) lie within the South Coast and 935.2 acres (57 percent) lie in the North County. The majority of the housing sites affected by WUI are existing vacant sites (68 percent), including 549.7 acres (33 percent) in the South Coast and 580.8 acres (35 percent) in the North County. Potential rezone sites under Program 1 of the Housing Element Update comprise approximately 236.6 acres (14 percent) of the housing sites area that lies within the WUI, including 80.5 acres on the South Coast and 156.1 acres in the North County. Potential rezones on the South Coast have the most acreage in the WUI interface zone at 29.8 acres.

Table 3.16-3. Summary of Housing Potential in the WUI (Acres)

Housing Site Type by WUI Zone	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Total Acres Affected by the WUI in the Housing Sites Inventory					
Existing Vacant Sites	**549.7**	**34.6**	**491.2**	**51.2**	**3.8**
Influence Zone	*439.4*	*26.9*	*413.2*	*35.8*	*2.4*
Interface Zone	*110.3*	*7.7*	*87.0*	*15.4*	*1.4*
Rezones	**80.5**	**6.4**	**143.7**	**5.9**	**0.1**
Influence Zone	*50.7*	*1.1*	*120.6*	*4.3*	*0.1*
Interface Zone	*29.8*	*5.3*	*23.1*	*1.6*	--
County-owned Sites	**5.1**	**--**	**--**	**--**	**--**
Influence Zone	*2.1*	--	--	--	--
Interface Zone	*3.0*	--	--	--	--
Pending Projects	**81.7**	**39.4**	**154.4**	**3.4**	**1.1**
Influence Zone	*61.3*	*23.8*	*147.8*	*2.4*	*1.1*
Interface Zone	*15.4*	*15.6*	*6.6*	*1.0*	*0.0*
Total by HMA	**717.0**	**80.4**	**789.4**	**60.4**	**5.0**
Influence Zone	*558.5*	*51.8*	*681.6*	*42.5*	*3.6*
Interface Zone	*158.5*	*28.6*	*107.8*	*17.4*	*1.4*
Total by RHNA Region	**717.0**	**935.2**			
Influence Zone	*558.5*	*779.4*			
Interface Zone	*158.5*	*155.8*			
Total Unincorporated County	**1,652.2**				
Influence Zone	*1,337.9*				
Interface Zone	*314.3*				

Nearly 85 percent of wildland fires in the U.S. are caused by humans. Human-caused fires result from campfires left unattended, the burning of debris, equipment use and malfunctions, negligently discarded cigarettes, and intentional acts of arson (USFS and National Park Service 2022). As such, the proposed Project would allow the construction and occupancy of new residential and mixed use development within designated High/Very High FHSZs and WUI areas and, therefore, would increase the potential for wildfire ignition and wildfire risks, including loss of life, exposure to harmful pollutants, and destruction of property and environmental resources.

For example, under the implementation of Program 1, Adequate Sites for RHNA and Monitoring of No Net Loss, the potential rezone program directs the County to rezone adequate sites to fully accommodate the RHNA plus the 15 percent buffer for lower- and moderate-income households. The rezoning will increase the allowed densities of potential housing sites thereby potentially increasing the number of residential units in high-risk areas. Additionally, Programs 1 and 2, Use by Right Approval, respectively, would streamline the approval process for by-right housing projects that meet density and affordability criteria, as required by state law, thereby potentially bypassing site-specific environmental review and discretionary approval that would ensure sites are developed to mitigate wildfire hazards. However, Program 1 also directs County staff to amend the zoning ordinances to allow a project applicant for a housing project to request a lower density (i.e., fewer units) than the specified minimum density when physical, environmental, infrastructural, or other constraints preclude a project from meeting the specified minimum density. Additionally, under Government Code Section 65589.5(d), the County could disapprove a housing project or impose a condition that the housing project be developed at a lower density on the grounds of a specific, adverse impact upon the public health or safety, if there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. Public health and safety impacts can include exposure to the uncontrollable spread of wildfire and/or pollutant concentrations.

Furthermore, as described in Section 3.16.3, *Regulatory Setting,* various plans, policies, regulations, and procedures apply to the construction, alteration, occupancy, and maintenance of structures that help to reduce wildfire risks and the exposure of people to uncontrollable wildfire spread. These include the CFC, the CBC, the PRC, Chapter 10 and Chapter 15 of the County Code, SBCFD development standards, and policies of the Seismic Safety and Safety Element of the Comprehensive Plan (see Section 3.16.3, *Regulatory Setting*), which address the siting, construction, occupancy, and protection of development and people as it relates to wildfire hazards. Potential future housing sites enabled under the proposed Project would be required to adhere to existing regulatory requirements.

Though future development would be subject to compliance with existing regulations for the provision of defensible space around a structure (e.g., PRC Section 4291, Chapter 15 of the County Code), adequate defensible space requirements may not be achievable through onsite vegetation clearance and fuel management to satisfactorily mitigate the significant prevailing threat of the uncontrollable spread of wildfire in the WUI areas and FHSZ areas due to the risks of high wind conditions as well as steep slopes and heavy vegetation commonly found in these areas. For example, Rezone Site No. 12 (St. Vincent's East) is located adjacent to the wildfire-prone areas of the San Marcos Foothills supporting dense vegetation and high fuel loads, where potential higher-density housing development (i.e., 20 units per acre or more) under Program 1 would place residents in areas vulnerable to wildfire. Therefore, even with existing regulatory requirements, the implementation of the proposed Project could increase the residential and mixed use development, including at greater permitted densities, in some of the highest-risk areas of the county to the threat of uncontrollable spread of wildfire and pollution concentrations resulting in a *potentially significant* impact.

The requirement of onsite defensible space for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law, as described in **MM WF-1 (Onsite Defensible Space Requirements)** would reduce wildfire risks and minimize secondary impacts to offsite environmental resources. (See Impact WF-3 below). However, **MM WF-1** would not fully mitigate to an insignificant level the potential risk of exposure to future residents of potential housing sites in the WUI/FHSZs due to the threat of the uncontrollable spread of wildfire and pollutant concentrations in these areas and the proposed higher-density development of these potential rezone sites. As

described above, the County under Government Code Section 655589.5(d) could disapprove a housing project or impose a condition that a housing project be developed at a lower density to avoid adverse impacts upon public health and safety, if there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. However, doing so would be infeasible because it would substantially reduce the ability for the County decision-makers to meet the regional housing needs and specific affordability targets required by the proposed Project. Therefore, impacts would remain *significant and unavoidable.*

Impact WF-3. The proposed Project would potentially require the installation or maintenance of associated infrastructure (e.g., fuel breaks and emergency access roads) that may result in temporary or permanent impacts on the environment (e.g., vegetation clearing) and may exacerbate fire risk.

As discussed in Chapter 2, *Project Description*, the majority of future residential development under the Housing Element Update would be accommodated as infill development in the Urban Area with existing infrastructure. Housing within these areas is anticipated to be located outside of the FHSZs and WUI areas and would be adequately served by existing infrastructure, such as roads and utilities. Therefore, future housing development in these areas would not require the installation or maintenance of associated facilities (e.g., fuel breaks) that would result in ongoing impacts on the environment. However, new housing development within the FHSZs or WUI areas, such as Rezone Site Nos. 11 (Glen Annie), 12 (St. Vincent's – East), and 13 (St. Vincent's West) on the South Coast, and Rezone Site No. 20 (Key Site 3) and No. 33 (Alexander 1) in North County, could require the installation or maintenance of associated infrastructure to facilitate housing development (e.g., roads and driveways, power lines, and other utilities). Similarly, firefighting facilities, including fuel breaks, emergency access roads, and/or emergency water, may also be required. As previously described, all new residential development in wildfire-prone areas of the county would be required to comply with existing regulations developed by the state (e.g., CFC, CBC, PRC), the County (e.g., Land Use and Development Code [LUDC], County Code of Ordinances), and other agencies (e.g., SBCFD development standards), which include various provisions for siting, construction, occupancy, and protection of development as it relates to wildfire hazards and reducing wildfire risks, wildfire exposure, and the uncontrolled spread of wildfires. The construction of infrastructure necessary to comply with these regulations would reduce the overall risk of wildfire hazards and associated impacts. These required improvements, however, could have adverse effects on biological resources and aesthetics and visual resources, as described below.

As with the operation of potential future new residential and mixed use development enabled under the Housing Element Update (Impact WF-2), the construction of infrastructure could increase the potential for ignition and spread of a wildfire due to grading or operation of machinery during construction or installation/maintenance of fuel breaks. Additionally, increased human presence in the wildland (Impact WF-2), as described above, increases the likelihood of ignitions. These required infrastructure improvements for wildfire prevention and preparedness may also have adverse impacts on other key resources found in the WUI and High/Very High FHSZ areas in the county. As described in Section 3.4, *Biological Resources*, these improvements may result in temporary or ongoing secondary impacts related to vegetation removal, loss of sensitive habitats, and disturbance or loss of special-status species. Additionally, as described in Section 3.1, *Aesthetics and Visual Resources*, the construction or maintenance of these facilities could result in vegetation removal and grading that would cause visual scarring in scenic areas of the county. As a result, the proposed Project could have *potentially significant* temporary or permanent impacts on the environment.

Implementation of **MM WF-1 (Onsite Defensible Space Requirements)** would help to ensure adequate defensible space is provided onsite to reduce wildfire risks of multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law on sites in the WUI and/or FHSZs; however, implementation of this mitigation would not fully reduce impacts to an insignificant level as it is possible that offsite improvements and defensible space management may be required depending on the site setting and SBCFD site-specific requirements for public and/or firefighter safety. The only way to fully avoid the wildfire impacts resulting from the implementation of the Housing Element Update would be to eliminate sites within the FHSZ and WUIs where the installation or maintenance of associated infrastructure would be required, thereby eliminating potential housing sites from future development at the densities envisioned with the rezones. However, doing so would be infeasible because it would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets. Therefore, impacts would remain *significant and unavoidable.*

Impact WF-4. The proposed Project would not substantially expose people or structures to significant post-wildfire risks, including downslope or downstream flooding, mudflows, or debris flows, as a result of runoff, post-fire slope instability, or drainage changes.

Under the proposed Project, potential residential development would primarily occur in the Urban Area with lower wildfire risk levels; however, some sites are proposed in High/Very High FHSZS and the WUI, and would therefore face a higher risk of wildfire and potential post-wildfire hazards. As previously described, known extents and locations of post-wildfire hazards, such as debris flow are mapped in the County's MJHMP. However, mudflows and debris flows have the potential to occur countywide wherever heavy rain occurs on steep, exposed slopes, particularly following wildfires. Therefore, the entire county is, to an extent, susceptible to post-wildfire hazards. However, places that are most susceptible to debris flow consist of areas downslope of steep WUI areas, near drainage corridors, and within expanded flood plains. Many of the potential housing sites enabled under the Housing Element Update are located in areas that are not especially prone to post-fire debris flow, mudflow, or flooding. For example, some sites in Orcutt are located along Orcutt Creek, but are not located within steep topographical areas and, therefore, are unlikely to be subject to debris flows given the relatively level flood plains in the area. Similarly, the South Coast potential housing sites generally lie in areas that are level and outside of steep creek channels that would convey debris flows in a post-fire event.

Additionally, all future residential development would be required to follow standards and practices aiming to prevent post-wildfire hazards, such as those in the Seismic and Safety Element of the Comprehensive Plan and County Code, which require existing and new development to be adequately protected from potential flooding or landslides through careful site planning, design, and construction (Section 3.16.3, *Regulatory Setting*). Although the Seismic Safety and Safety Element does not have policies that pertain directly to debris flows, these policies would nonetheless serve to reduce some associated risks. As discussed in Impact WF-2, all potential future development within wildfire-prone areas in the county would also be required to comply with PRC, CFC, CBC, and other local and state regulations addressing the development and design of habitable structures to safeguard public health and reduce fire hazards. As a result, impacts relating to post-wildfire hazards would be *insignificant*.

3.16.4.3 Cumulative Impacts

As described in Section 3.0, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of long-range plans, policies, and initiatives as well as development projects (housing and non-housing related) in the unincorporated county and surrounding incorporated cities. Project impacts along with potential impacts from past, pending, and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects, such as the Accessory Dwelling Unit (ADU) Ordinance Amendments (Cumulative Project No. 13) to incorporated cities in Santa Barbara County's 2023-2031 Housing Element Update (Cumulative Project No. 1 – 8) (Table 3-6).

The proposed Project would result in cumulatively considerable impacts if it, in combination with other cumulative past, pending, and current plans and projects, would substantially increase risks or expose residents to wildfire-related hazards (e.g., pollutant concentrations, post-fire conditions). The cumulative setting for the proposed Project includes the housing element updates for each of the eight incorporated cities within the county (Table 3-6). Under each of these cumulative projects, each agency is planning for how to meet local housing needs and the RHNA plus the 15 percent buffer for lower- and moderate-income units assigned by the Santa Barbara County Association of Governments (SBCAG) by identifying potential sites for new housing development, potential sites for rezoning to residential uses, as necessary, and implementing a variety of programs that would encourage or facilitate new residential development. In total, the housing element updates for the incorporated cities are expected to plan for the development of a minimum of 19,192 new units. Other cumulative planning efforts are listed in Section 3.0.6, *Cumulative Impacts Analyses*.

Cumulative projects, particularly projects involving new development or those resulting in an increase in population within wildfire-prone areas, could result in an increased risk of ignition, the spread of wildfires, and exposure of future residents or visitors to wildfire risks and post-wildfire hazards. In the event of a wildfire, additional potential residential development enabled under the proposed Project could exacerbate issues relating to evacuation and exposure of residents to wildfire, pollutant concentrations, and post-fire hazards when considered alongside other cumulative projects. However, as described in Impact WF-1, SBCOEM implements its EMP continuously to ensure life and property safety, security, and protection, as well as assure the overall well-being, of the population during a disaster, including providing hazard warning and emergency response services. Because wildfire behavior varies dramatically based on location and conditions, emergency response and evacuation orders are provided in response to each wildfire event to ensure orderly and timely evacuation of potentially affected residents. Further, all new development throughout the incorporated and unincorporated areas of the county are subject to the CFC, CBC, County Code, and other various local and state regulations, which require adequate and unobstructed emergency access and would ensure all cumulative pending development provides adequate access during a wildfire to allow emergency response to and evacuation of the site, either through multiple points of ingress/egress or through other actions deemed appropriate by SBCFD. Therefore, impacts associated with impairment of an adopted emergency response plan or emergency evacuation plan would be cumulatively *insignificant.*

In addition, included in the list of cumulative policies and initiatives in the county is the Seismic Safety and Safety Element Update of the Comprehensive Plan (Project No. 22), the San Marcos Pass – Eastern Goleta Valley Mountainous Communities CWPP (Project No. 24), and the Carpinteria Summerland Fire Protection District CWPP (Project No. 25). The Seismic Safety and Safety Element Update will incorporate new policies and programs in compliance with recent state laws to better prepare for

risks associated with wildfire and flood hazards, with Phase I of the update focused on wildfire policy amendments. These cumulative pending projects would further serve to reduce risks associated with wildfire hazards, as well as post-wildfire-related hazards throughout the county, particularly in the South Coast where wildfire hazards may present the greatest risk and where new CWPPs addressing these risks are proposed.

While wildfire hazards would be addressed on a case-by-case basis to mitigate impacts resulting from each project and cumulative pending development would be subject to compliance with existing regulations addressing wildfire hazards, implementation of the proposed Project would continue to have the potential to result in substantially adverse impacts associated with increases in development and the introduction of new populations within wildfire-prone areas to wildfire pollutants or the uncontrollable spread of wildfires. Other cumulative projects, such as the housing element updates proposed by the eight incorporated cities, also have the potential to result in increased development and exposure of existing residents and potentially thousands of additional future residents to increased wildfire hazards. As a result, cumulatively, impacts are considered *potentially significant.* While implementation of **MM WF-1 (Onsite Defensible Space Requirements)** would help to reduce the contributing effects of the proposed Project, introducing or facilitating the introduction of new development to these areas presents a risk to existing and future populations. Therefore, the Project's contribution would be cumulatively considerable, and cumulative impacts would be *significant and unavoidable.*

3.16.4.4 Proposed Mitigation

MM WF-1: Onsite Defensible Space Requirements. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall provide adequate defensible space onsite if the housing project is proposed within or adjacent to the High or Very High FHSZs and/or WUI areas and must comply with the SBCFD's Defensible Space Standards. ~~(as determined appropriate by the SBCFD). Applicable projects shall provide a minimum 100-foot setback between habitable structures and wildland vegetation. A larger setback may be required if SBCFD determines that a greater distance is required for public and/or firefighter safety. All defensible space setback requirements shall be accommodated onsite to the extent feasible.~~ No offsite clearing of sensitive native vegetation shall be permitted unless deemed necessary by SBCFD for public and/or firefighter safety.

Requirements and Timing: SBCFD shall apply the Defensible Space Standards for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law and are located within or adjacent to the High or Very High FHSZs and/or WUI areas. Application and approval of the Defensible Space Standards to qualifying projects by SBCFD shall be required before the issuance of grading or building permits.~~The County shall amend the zoning codes to include new setback requirements for applicable projects proposed in areas of the unincorporated county mapped within the WUI and/or High and Very High FHSZs. Revised setback requirements shall be developed in coordination with SBCFD to ensure applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law can accommodate adequate defensible space onsite and around habitable structures.~~

~~Amendments to the zoning codes shall be implemented within two years of adoption of the Housing Element Update.~~

Monitoring: Applicable defensible space setback requirements shall be included in applicable project plans. County P&D compliance monitoring staff shall ensure compliance with project plans prior to Final Building Inspection Clearance.

3.16.4.5 Secondary Impacts

Implementation of **MM WF-1 (Onsite Defensible Space Requirements)** would potentially create significant secondary impacts associated with changes in community character and land use compatibility. With the implementation of required onsite defensible space buffers of a minimum of 100 feet, onsite developable acreage could be substantially reduced, and sites designated for 20 to 40 units per acre may need to propose taller multiple-story development projects of four or more stories to meet maximum and perhaps even minimum densities to achieve Housing Element Update goals, policies, and programs. While Program 1 directs County staff to amend the zoning ordinances to allow a project applicant for a housing project to request a lower density (i.e., fewer units) than the specified minimum density when physical, environmental, infrastructural, or other constraints preclude a project from meeting the specified minimum density, the proposed Project retains the potential for increased aesthetic and compatibility impacts from housing development. Such potential impacts are discussed more fully in Section 3.1, *Aesthetics and Visual Resources*, Section 3.4, *Biological Resources*, and in Section 3.10, *Land Use and Planning*.

3.16.4.6 Residual Impacts

Impact WF-1. The County does not designate specific emergency evacuation routes and does not maintain a specific emergency evacuation plan. Emergency response plans and evacuations in the county are meant to be scalable, adaptable, and responsive to specific emergency situations. Potential development resulting from the proposed Project would be required to comply with existing regulations of the CFC, CBC, County Code, Comprehensive Plan, and various other local and state regulations which require adequate and unobstructed emergency access for fire department apparatus and personnel to buildings, structures, hazardous occupancies, or other premises, including at least two routes of ingress and egress to facilitate emergency response and evacuation. Compliance with these policies would ensure that the proposed Project would not significantly impair an emergency response plan or emergency evacuation plan, and residual impacts would be *insignificant.*

Impact WF-2. Implementation of **MM WF-1 (Onsite Defensible Space Requirements)** would multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law provide adequate onsite defensible space. Implementation of this measure would reduce the impacts of the proposed Project from future housing development within or adjacent to the High or Very High FHSZs and WUI areas by requiring onsite setbacks to provide adequate defensible space. Even with required mitigation, the proposed Project would continue to result in significant impacts by exposing potential residential development enabled under the Housing Element Update within wildfire-prone hazard areas. The only way to fully avoid the wildfire impacts resulting from the proposed Project would be to eliminate sites within the High and Very High FHSZ and WUI areas. However, doing so would substantially reduce flexibility or eliminate the ability of County decision-makers to meet regional

housing needs and specific affordability targets. Therefore, impacts would remain *significant and unavoidable.*

Impact WF-3. Potential development resulting from the proposed Project would be required to comply with existing regulations addressing wildfire hazards, including offsite infrastructure improvements, which could cause temporary or permanent impacts to biological resources and aesthetics and visual resources. Implementation of **MM WF-1 (Onsite Defensible Space Requirements)** would reduce the impacts of the proposed Project within or adjacent to the High or Very High FHSZs and WUI areas by requiring onsite setbacks to provide adequate defensible space onsite. The only way to fully avoid the wildfire impacts resulting from the proposed Project would be to eliminate sites within the High and Very High FHSZ and WUI areas. However, doing so would substantially reduce flexibility or eliminate the ability of County decision-makers to meet regional housing needs and specific affordability targets. Therefore, impacts would remain *significant and unavoidable.*

Further, implementation of **MM WF-1 (Onsite Defensible Space Requirements)** has the potential to result in additional secondary impacts on aesthetics and visual resources as a result of increases in setback requirements. (Refer to Sections 3.1, *Aesthetics and Visual Resources*, and 3.4, *Biological Resources*, for detailed discussions of impacts on aesthetic and visual and biological resources, respectively.)

Impact WF-4. Potential development resulting from the proposed Project would be required to comply with existing regulations of the CFC, CBC, County Code, Comprehensive Plan, and various other local and state regulations addressing wildfire, flooding, mudflow, and debris flow hazards. Compliance with these policies would ensure that the proposed Project would not significantly exacerbate post-wildfire hazards or risks, including mud and debris flows, and residual impacts would be *insignificant.*

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Chapter 4
Alternatives Analysis

4.1 Introduction

The County of Santa Barbara (County) prepared this Program Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA) statutes under Public Resources Code (PRC) Sections 21000-21189.57 and the CEQA Guidelines under the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Sections 15000-15387. CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project that would avoid or substantially reduce the significant impacts while accomplishing all or most of the project objectives. This chapter describes five potential alternatives to the 2023-2031 Housing Element Update (Housing Element Update; Project), including the No Project Alternative. The County must consider these alternatives relative to the state-mandated update of the County's Housing Element and the 6th Cycle Regional Housing Needs Allocation (RHNA), which may reduce County discretion over the selection of a particular alternative since any selected alternative would need to be consistent with state law.

The CEQA Guidelines provide the following guidance for evaluating alternatives in EIRs:

- An EIR need not consider every conceivable alternative to a project. Rather, the range of alternatives required in an EIR is governed by a "rule of reason." The EIR is required to set forth only those alternatives that are necessary to permit a reasoned choice and that foster meaningful public participation and informed decision-making. An EIR is not required to consider alternatives that are infeasible or alternatives whose effects cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines Section 15126.6[a]). Notably, alternatives analyzed in an EIR need not be "actually feasible," but rather need only be "potentially feasible." Whether alternatives are "actually feasible" is a determination ultimately made by a lead agency's decision-making body (i.e., County Board of Supervisors) at the time of action on a project based on a variety of factors, including how well alternatives meet the stated project objectives. A decision-making body can reject alternatives on policy grounds provided that its adopted findings addressing feasibility embody a reasonable balancing of competing economic, social, environmental, and other considerations supported by substantial evidence (*California Native Plant Society v. City of Santa Cruz* [2009] 177 Ca. App.4th 957, 998).

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).

- In selecting a range of potential reasonable alternatives to the proposed project, the lead agency shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially reduce one or more of the significant effects. Among the factors that a lead agency may use to eliminate alternatives from detailed consideration

are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).

- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines 15126.6[d]).
- The CEQA Guidelines also require an EIR to evaluate a "no project" alternative. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the project. The analysis of the "no project" alternative must discuss the existing conditions at the time the Notice of Preparation (NOP) is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved based on current plans and consistent with available infrastructure and community services. As stated in the CEQA Guidelines, when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or operation into the future. Typically, this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan (CEQA Guidelines Section 15126.6[e][2]-[3][A]).
- The CEQA Guidelines require that the EIR identify an "environmentally superior" alternative among the alternatives analyzed. Pursuant to CEQA Guidelines Section 15126.6(e), "if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." The lead agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible, per CEQA Guidelines Section 15126.6(a), (c), and (f).

4.2 Project Goals and Objectives

As described in Chapter 2, *Project Description*, the Housing Element Update includes six goals that the County developed based on public input and in recognition of the County's core community values, as follows:

1. Enhance the affordability, diversity, quantity, and quality of the housing supply and promote livable communities.
2. Promote, encourage, and facilitate housing for special needs groups.
3. Affirmatively further fair housing.
4. Preserve the affordable housing stock and cultivate financial resources for the provision of affordable housing in Santa Barbara County.
5. Foster cooperative relationships and efficient government.

6. Promote homeownership and/or the continued availability of affordable housing units through programs and implementing ordinances for all economic segments of the population, including extremely low-, very low-, low-, moderate-, and/or upper moderate-income households to assure that existing and projected needs for affordable housing are accommodated in residential development with preference given to people who live and/or work within Santa Barbara County.

The Program EIR recognizes these goals and builds upon them to provide Project Objectives that address key housing planning issues and related environmental impacts. These objectives helped guide the development of alternatives to the proposed Project and may set forth the basis for preparing findings and a statement of overriding considerations, if necessary (CEQA Guidelines Section 15124). The Program EIR's Project Objectives include the following:

1. Rezone sites to accommodate the County's state-mandated 6th Cycle RHNA (5,644 units) plus a 15 percent buffer for the lower- and moderate-income categories (576 units), which total 6,240 units.
2. Promote housing development on infill sites and maximize housing capacity by rezoning at higher densities to facilitate multifamily housing to accommodate housing for lower- and moderate-income households.
3. Promote a jobs-to-housing balance countywide by facilitating the development of sufficient and affordable housing in close proximity to job centers and essential community services.
4. Encourage diverse housing types that meet the requirements of special needs households.
5. Promote equal housing opportunities and locational choices for all persons in all housing types.
6. Promote and support fair housing choice and fair housing public outreach programs.
7. Collaborate with developers to improve and conserve affordable housing units and provide gap financing for affordable units.
8. Reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.
9. Prioritize housing for people who live and/or work within Santa Barbara County.
10. Ensure new housing sites have adequate infrastructure and do not face significant environmental constraints.

4.2.1 Summary of Potentially Significant and Unavoidable Impacts

Based on the analysis provided in this Program EIR, the proposed Project would result in potentially significant and unavoidable impacts on aesthetics and visual resources, agricultural resources, air quality, biological resources, hydrology and water quality, land use and planning, population and housing, public services and recreation, transportation, utilities and water supply, and wildfire. The proposed Project would also result in substantial contributions to cumulatively significant impacts on several of these resource areas.

- **Aesthetics and Visual Resources.** The proposed Project could result in adverse effects on public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways. Development of properties with higher-density housing projects on sites that are visible from public vistas and State Scenic Highways could substantially change and/or obstruct existing public views and degrade the visual resource value of those views. The proposed Project could degrade the existing visual character or quality of public views of a site and its surroundings in the rural area or potentially conflict with applicable zoning and other regulations governing scenic quality in the Urban Area.
- **Agricultural Resources.** The proposed Project could potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural uses. Additionally, the proposed Project could potentially rezone existing agriculturally zoned lands to non-agricultural uses, including rural agricultural land adjacent to Urban Areas as well as urban agricultural areas such as the South Patterson Agricultural Area and the San Marcos Agricultural Area within the Eastern Goleta Valley Community Planning Area.
- **Air Quality.** The proposed Project could potentially violate an air quality standard or substantially contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which Santa Barbara County is in nonattainment. Based on the air emissions modeling results for the proposed Project, the increase in emissions for nitrogen oxides (NO_x), reactive organic compounds (ROCs), and particulate matter (PM_{10}) resulting from the operation of the proposed Project could substantially exceed the adopted operational significance thresholds for all emissions, as well as mobile-source-specific emissions. The primary contributors to the exceedance of adopted thresholds include area-source emissions (e.g., those generated from the use of consumer products and re-application of architectural coatings) and mobile-source emissions associated with the substantial increases in daily vehicle trips associated with the proposed Project.
- **Biological Resources.** The proposed Project could impact environmentally sensitive habitat (ESH), riparian corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities, particularly within the unincorporated areas of Eastern Goleta Valley, Orcutt, Mission Hills, Vandenberg Village, and Santa Ynez Valley. The proposed Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Although site-specific impacts cannot be determined due to the programmatic nature of this analysis, future residential and mixed use development could require substantial site alteration and grading that would create potential impacts on sites supporting or bordering habitat for such species. The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. For example, the development of housing on sites that are currently undeveloped could result in habitat fragmentation and the creation of barriers (e.g., fences or walls).
- **Hydrology and Water Quality.** The proposed Project could substantially degrade groundwater quality, interfere substantially with groundwater recharge, or impede sustainable groundwater management of local groundwater basins. The proposed Project would not conflict with or obstruct the implementation of a water quality control plan. However, future residential and mixed use development enabled by the Housing Element Update could overlap the Cuyama Valley,

San Antonio Creek Valley, and Santa Ynez River Valley basins, which are all medium or high-priority basins and as such, have adopted groundwater sustainability plans (GSPs) governing the sustainable management of their respective groundwater resources. Future development enabled under the Housing Element Update would exceed the growth projections used to inform the management of groundwater supplies for domestic use. As such, new residential and mixed use development in these areas would potentially conflict with the GSPs and obstruct the management actions and sustainability strategies for these basins.

- **Land Use and Planning.** The proposed Project could result in physical effects that potentially conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.
- **Population and Housing.** The substantial increase in future housing units enabled under the Housing Element Update and, consequently, the additional population that could result from the proposed Project create the potential for substantial population growth that would exceed current population projections, including the Santa Barbara County Association of Governments (SBCAG) Connected 2050 Regional Transportation Plan/Sustainable Community Strategy (Connected 2050 RTP/SCS) and its regional growth forecasts.
- **Public Services and Recreation.** The proposed Project could result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. Additionally, the proposed Project could increase the use of existing parks and recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or could require the construction or expansion of recreational facilities which might have an adverse impact on the environment.
- **Transportation.** The proposed Project could result in potentially significant increases in total vehicle miles traveled (VMT) per service population within the county. Under the proposed Project, Total VMT per Service Population would exceed the County's VMT impact threshold on a countywide basis and in each of the four North County Housing Market Areas (HMAs): Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley.
- **Utilities and Water Supply.** The proposed Project would require the construction, expansion, or replacement of utilities, including water and wastewater facilities, which could potentially result in significant environmental effects. Potential development resulting from the proposed Project would generate additional water demand that could exceed the available water supply of the Goleta Water District and Cuyama Community Services District (CSD), resulting in a lack of reliable water supplies to meet the future demands of the residential and mixed use development enabled under the proposed Project. Potential development resulting from the proposed Project would generate additional wastewater that could exceed the capacity of the Goleta Sanitary District, Goleta West Sanitary District, Los Alamos CSD, Laguna County Sanitation District, and Cuyama CSD. While future development would be subject to existing laws, regulations, plans, and policies to reduce the amount of solid waste generated and disposed of in regional landfills, potential development resulting from the proposed Project would generate additional municipal solid waste that could exceed the County's adopted thresholds and potentially result in the exceedance of the disposal capacity of regional landfills, or result in the need for future expansion or expedited closure of a landfill.

Wildfire. The proposed Project could exacerbate wildfire risks and could expose existing or future residents to pollutant concentrations resulting from the uncontrolled spread of wildfire at several sites throughout the county, particularly along the wildland-urban interface (WUI) on the south-facing slopes of the Santa Ynez Mountains on the South Coast.

4.3 Alternatives Selection Methodology

Unlike a site development project or an update to the general plan initiated by a local agency, the Housing Element Update is being undertaken in response to the state-mandated 6th Cycle RNHA that identified a specific number of new housing units that the County is required to plan for and accommodate during the 8-year planning period from 2023-2031. As described in Section 1.1, *Project Overview*, regional housing needs are determined by the State of California Department of Housing and Community Development (State HCD), which decides the numerical housing targets for each regional council of governments, including SBCAG. Each regional council of governments across the state then further allocates the regional housing number (known as the RHNA) to every city and county within its jurisdiction. For the 6th Cycle Housing Element Update, SBCAG determined that the County's RHNA is 5,664 housing units. Approximately 73 percent of the units must be provided in the South Coast HMA while the remaining 27 percent must be provided in the North County HMAs, including the Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley. The County also included a 15 percent buffer for the lower- and moderate-income categories (576 units), for a total of 6,240 units planned countywide.

The RHNA is a targeted housing number; cities and counties must plan for the RHNA and show that under applicable land use and development standards, there is capacity to accommodate this number of new dwelling units. The County is required to meet its obligation to plan for the 6th Cycle RHNA under state housing law. If State HCD determines that a Housing Element Update fails to substantially comply with state housing law, there are potentially serious consequences for the public, including limited access to state funding and potential for lawsuits. Nevertheless, pursuant to the requirements of CEQA, alternatives to the Housing Element Update were identified and either retained for further analysis or eliminated, as described below.

As required by the CEQA Guidelines, the selection of alternatives included a screening process to determine which alternatives could avoid or reduce significant effects and also feasibly meet the Project Objectives. Because of the *significant and unavoidable* impacts described above, these screening criteria were particularly important for determining the feasibility of alternatives. The alternatives selection process consisted of the following steps:

Step 1: Review the significant effects that could occur with the implementation of the Housing Element Update and identify possible alternatives to avoid or reduce such impacts.

Step 2: Evaluate each alternative in the context of the following criteria:

- The extent to which the alternative would avoid or substantially reduce one or more of the identified significant environmental effects of the Housing Element Update;
- The extent to which the alternative would accomplish most of the Project Objectives (i.e., the goals and policies of the Housing Element Update described above and in Section 2.3.1, *Project Objectives*); and

- The potential feasibility of the alternative, taking into account factors such as the availability and suitability of sites to accommodate planned housing; economic viability; availability of infrastructure; consistency with the County's Comprehensive Plan; and consistency with other applicable plans, policies, and regulatory limitations such as the Connect 2050 RTP/SCS.

Step 3: Determine the suitability of the proposed alternative for full analysis in the Program EIR based on Steps 1 and 2 above. In the final phase of the screening analysis, the environmental advantages and disadvantages of the remaining alternatives were carefully weighed with respect to their potential for overall environmental advantage, technical feasibility, and consistency with the Project Objectives. Alternatives that did not clearly offer the potential to reduce significant environmental impacts, would not achieve all or most Project Objectives, and/or would not be feasible were rejected from further consideration and analysis. For the Housing Element Update, characteristics used to eliminate alternatives from further consideration included:

- Inability to avoid or substantially reduce the significant environmental impacts associated with the proposed Project;
- Inconsistency with the County's Comprehensive Plan and other applicable plans and policies; and
- Inability to meet all or most of the Project Objectives.

As described in Section 1.1, *Project Overview*, the public process for developing the Housing Element Update included public workshops and hearings, community forums, focus group meetings, key stakeholder meetings, and pop-up events. The outcomes of these public meetings and workshops resulted in the development of goals and policies (*Chapter 5, Housing Plan and Resources* of the Housing Element Update), which were the basis of the Project Objectives (Section 2.3.1, *Project Objectives*). Additionally, as described in Section 1.6, *Environmental Review Process*, the County conducted a public scoping process consistent with CEQA Guidelines Section 15083. The public was provided with an opportunity to comment on the scope of the Program EIR – including the scope of the alternatives considered for further analysis – through an NOP released on July 21, 2021, along with a revised NOP released on August 11, 2022.

4.4 Alternatives Considered and Rejected

As previously described, CEQA Guidelines Section 15126.6(c) requires that an EIR disclose alternatives that were considered and rejected and provide a brief explanation as to why such alternatives were not fully considered in the EIR. The following alternatives were considered but were ultimately eliminated from further analysis by the County due to infeasibility, inability to avoid or substantially reduce significant project impacts, or inconsistency with the Project Objectives. Several other alternatives were considered – including an alternative that would accommodate all of the residential and mixed use development in the South Coast and an alternative planning horizon that would extend potential development through the year 2040 or beyond – but were found to be inconsistent with the state's mandate to plan for the 6th Cycle RHNA within the 8-year planning period (2023-2031). This state mandate significantly narrows options available for the alternatives analysis that both meet the basic Project Objectives that are driven by the RHNA issued by SBCAG, as well as those capable of avoiding or substantially reducing the potentially significant impacts identified for the Housing Element Update.

Section 2.3, *Housing Element Update*, describes the sites inventory prepared to demonstrate the capacity for the RHNA in the Housing Element Update. As described further therein, the sites inventory identifies vacant and non-vacant sites in the unincorporated areas of Santa Barbara County that could accommodate residential and mixed use development during the 2023-2031 planning period. Based on the County's assessment of existing capacity for housing under vacant sites (existing zoning), projected accessory dwelling units (ADUs), and pending projects, the County faces a shortfall of 2,521 units for lower- and moderate-income households in the South Coast and 487 units for lower-income households in the North County during the 2023-2031 planning period. Therefore, the County is considering potential sites to rezone as well as potential County-owned sites to accommodate this shortfall in the South Coast and the North County (Table 2-5 and Table 2-6). The County identified 9 potential County-owned sites that could be selected and provide up to 320 units as well as 36 sites that could be rezoned to accommodate new housing to meet the County's RHNA plus a 15 percent buffer for lower- and moderate-income categories, including all affordability levels. Several alternatives that would modify the list of potential rezone sites in the sites inventory or adjust the RHNA distribution in the unincorporated county were considered but ultimately discarded for the reasons provided below.

4.4.1 Removal of Potential Glen Annie and South Patterson Agricultural Area Rezone Sites

Under this alternative, the County would implement the plans, policies, and the list of rezones described for the Housing Element Update as described in Chapter 2, *Project Description*. However, the County would revise its list of rezones to remove Rezone Site No. 11 (Glen Annie) and Rezone Site No. 1 through No. 7 (referred to as the South Patterson Agricultural Area [i.e., Giorgi, Scott, Ekwill, St. Athanasius, Caird 1, Caird 2, and Caird 3]). Based on the Housing Element Update's analysis of realistic capacity for the buildout of these sites as required by State HCD, County staff determined that removal of all these sites from consideration for rezoning would not fully accommodate the County's RHNA plus the 15 percent buffer for lower- to moderate-income units. Specifically, this alternative would result in a shortfall of 546 units in the lower-income category and 546 units in the moderate-income category on the South Coast. Based on this assessment, the removal of these sites would be infeasible. Additionally, the removal of the South Patterson Agricultural Area alone would not fully accommodate the County's RHNA plus the 15 percent buffer for the lower- and moderate-income units. As a result, this alternative would not comply with state housing law or achieve the Project Objectives, including Objective 1, and, therefore, was discarded from further consideration.

4.4.2 Inclusion of the Additional Agricultural Parcels in the Carpinteria Valley Coastal Zone

Under this alternative, the County would implement the plans, policies, and the list of rezones in the Housing Element Update as described in Chapter 2, *Project Description*. However, the County would also include additional agricultural parcels located within the Carpinteria Valley and the Coastal Zone as potential rezone sites, which could result in the additional combined development of up to a minimum additional 2,299 units on 78.3 acres (Table 4-1). This alternative would help balance the distribution of housing by shifting some potential rezone sites from Eastern Goleta Valley to the southern portion of the South Coast. However, the nine parcels considered for this alternative are zoned and used for agriculture and are not associated with any farmworker, lower-income, or other beneficial housing projects. As a result, including these agricultural parcels as potential rezone sites

would conflict with policies and other regulatory barriers of the California Coastal Act that make the conversion of agricultural lands to residential use more challenging. Additionally, the County contacted the land owners listed in Table 4-1, and none of the land owners were interested in property inclusion in the proposed Project's sites inventory.

The California Coastal Act requires that the California Coastal Commission (CCC) approve (i.e., certify) rezones in the Coastal Zone. This requirement combined with regulatory barriers makes the construction of housing units on these agricultural parcels unlikely by 2031. As a result, this alternative would not achieve the Project Objectives, including Objective 1 and Objective 9, and, therefore, was discarded from further consideration.

Table 4-1. Additional Agricultural Sites in the Carpinteria Valley Coastal Zone Considered for Potential Rezone Sites

Site Name	Site Adress	Assessor's Parcel Number (APN)	Parcel Size	Current Zoning	Potential Zoning	Minimum Unit Potential
Van Wingerden 3	1360 Cravens Lane	004-013-025	3.53	AG-I-5	DR-30/40	60
Leason	4255 Upson Road	004-130-010	7.42	AG-I-5	DR-30/40	222
Kitagawa	1435 Santa Monica Road	004-013-011	6.97	AG-I-5	DR-30/40	209
Endow	1530 Santa Monica Road	004-003-011	9.69	AG-I-5	DR-30/40	290
Foothill	5335 Foothill Road	001-060-001	11.48	AG-I-10	DR-30/40	344
Fowler 1	--	001-070-015	5.59	AG-I-10	DR-30/40	167
Fowler 2	--	001-060-060	25.27	AG-I-10	DR-30/40	758
Kono 1	5888 Via Real	001-080-033	4.29	AG-I-10	DR-30/40	128
Kono 2	--	001-180-026	4.06	AG-I-10	DR-30/40	121

Notably, the Housing Element Update includes two nearby potential rezone sites in the Coastal Zone that are also zoned and used for agriculture – Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2). These were included because the property owner may partner with a local non-profit housing organization to redevelop the sites for farmworker and/or lower-income housing. PRC §30604(f), a provision in the California Coastal Act, directs the CCC to "…encourage housing opportunities for persons of low- and moderate-income."

4.4.3 Redistribution of RHNA to Increase the Balance of Units between North County and the South Coast

As previously described, the SBCAG 2023-2031 RHNA Plan assigns the County's RHNA to two sub-regions, referred to as the South Coast and the North County (SBCAG 2021). The 2023-2031 RHNA Plan allocates nearly 73 percent (4,142 units) of the County's 5,664 units to the South Coast, which provides substantial jobs but lacks sufficient affordable housing (i.e., jobs-to-housing imbalance). The remaining 27 percent (1,522 units) are assigned to the North County HMAs, including the Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley.

Under this alternative, the County would redistribute the RHNA to balance the number of housing units equally between the South Coast and the North County. However, while this alternative would reduce residential development in the South Coast, it would be inconsistent with the 2023-2031 RHNA Plan and would not address the jobs-to-housing imbalance in the South Coast or the associated long-distance commute and greenhouse gas (GHG) emission issues. The RHNA methodology focuses on the existing jobs-to-housing imbalance and favors a housing allocation to the South Coast, where approximately 60 percent of existing jobs in the region are located. Because this alternative does not achieve the RHNA distribution and does not achieve Project Objectives, including Objective 5, this alternative was discarded from further consideration.

4.5 Alternatives Considered and Analyzed

The County considered several alternatives to the proposed Project through the screening process described in Section 4.3, *Alternatives Selection Methodology*. The purpose of considering and analyzing alternatives under CEQA is to identify other means to attain the Project Objectives (Section 2.3.1, *Goals and Objectives*) while avoiding or substantially reducing potentially significant environmental impacts caused by adopting the proposed Project, as described in Section 4.2.1, *Summary of Potentially Significant and Unavoidable Impacts*. A reasonable range of alternatives with the potential to attain the basic Project Objectives but avoid or substantially lessen significant impacts is analyzed below. Each alternative is discussed relative to the Project Objectives. Alternatives selected for this analysis are summarized in Table 4-2, including the No Project alternative as required by CEQA.

Table 4-2. Alternatives Considered and Analyzed

Alternative	Key Details/Description
No Project Alternative	• No implementation of programs of the Housing Element Update, including but not limited to: ○ Revisions to development standards for residential and mixed use development ○ Use-by-right and ministerial approval of new housing projects ○ Revised Density Bonus Provisions ○ Amendments to the County's Inclusionary Housing Ordinance (IHO) ○ Support for expansion of water and wastewater services for new housing projects ○ Support for recreation planning to support the demands of new residential development • Continued allowance of ADUs under existing zoning regulations • No rezoning of sites identified under Program 1 of the Housing Element Update (Potential Rezone Program) • No future development of the nine potential County-owned sites • Continued buildout of existing vacant sites under current zoning regulations, including vacant sites included in the Potential Rezone Program • Continued buildout of 18 pending cumulative projects

Table 4-2. Alternatives Considered and Analyzed (Continued)

Alternative	Key Details/Description
Alternative 2 – Sustainable Communities Strategy	• Relocate housing capacity from areas that are underserved by transit and other public services to areas that are within Transit Priority Areas (TPAs) and/or High-Quality Transit Corridors (HQTCs) or in VMT-efficient areas while achieving the RHNA for South Coast and North County. This would involve: o Revisions to the sites inventory in the South Coast to include only those potential rezone sites with all or a portion of the site located within the HQTC in the South Coast, as mapped by SBCAG. o Revisions to the sites inventory in the North County to include only those potential rezone sites located in the Santa Maria Valley. ▪ Specific sites that would be eliminated would include Rezone Site Nos. 11 (Glen Annie), 12 (St. Vincent's – East), 13 (St. Vincent's – West), 15 (Van Wingerden 1), 16 (Van Wingerden 2), 32 (Fong 1), 33 (Fong 2), 34 (Alexander 1), 35 (Chumash LLC), and 36 (Blue Sky Property). The housing capacity of those potential rezone sites would be relocated to areas within the HQTC on the South Coast or Orcutt within Santa Maria Valley. o To make up for the difference and accommodate the full RHNA plus 15 percent buffer, the housing capacity associated with these eliminated sites would be reallocated and balanced within the unincorporated communities in the South Coast and Santa Maria Valley (i.e., Eastern Goleta Valley and Orcutt), which are VMT-efficient regions of the county. • Implement all other elements of the proposed Project
Alternative 3 – Reduced Project A	• Remove the following sites from the Potential Rezone Program, and retain existing zoning for those sites: o Rezone Site Nos. 2 (St. Athanasius Church), 3 (Scott), 4 (Ekwill), 5 (Caird 1), 6 (Caird 2), 7 (Caird 3), 24 (Key Site 26), 26 (North Point HOA), and 27 (Boys and Girls Club) • Implement all other elements of the proposed Project
Alternative 4 – Reduced Project B	• Remove the following sites from the Potential Rezone Program, and retain existing zoning for those sites: o Rezone Site Nos. 2 (St. Athanasius Church), 3 (Scott), 4 (Ekwill), 11 (Glen Annie), 19 (Key Site 1), and 23 (Key Site 16) • Modify the Potential Rezone Program to change the potential rezoning of sites as follows: o Rezone Site No. 24 (Key Site 26) to C-2 and DR-20/30 (potentially rezoned to C-2 and DR-30/40 under proposed Project) • Implement all other elements of the proposed Project
Alternative 5 – Reduced Project C	• Remove the following sites from the Potential Rezone Program, and retain existing zoning for those sites: o Rezone Site Nos. 1 (Giorgi), 10 (McCloskey Lelande), 17 (Montessori), 21 (Key Site 10), and 22 (Key Site 11) • Modify the Potential Rezone Program to change the potential rezoning of sites as follows: o Rezone No. 23 (Key Site 16) to DR-20/30 (potentially rezoned to DR-30/40 under proposed Project) • Implement all other elements of the proposed Project

4.5.1 No Project Alternative

In compliance with CEQA Guidelines Section 15126.6[e][1]), this Program EIR evaluates a No Project Alternative to compare the impacts of the proposed Project with impacts that would occur if the proposed Project were not approved and implemented. Under the No Project Alternative, the Housing Element Update would not be implemented by the County. The adoption and implementation of a 6th Cycle Housing Element Update is mandatory, so consideration of this alternative is presented solely to comply with CEQA and is not a feasible alternative for the County.

Under the No Project Alternative, the County would not implement the Housing Element Update and would not achieve the state-mandated 6th Cycle 2023-2031 RHNA (Section 2.1.3, *Existing State and County Housing Programs*). Instead, future residential growth within the unincorporated areas of the county would continue under existing adopted plans, policies, and regulations. Residential development would continue to be subject to the applicable existing policies and standards contained within the County's Comprehensive Plan, Community and Area Plans, County zoning ordinances, including the Land Use and Development Code (LUDC), the Montecito Land Use and Development Code (MLUDC), and the Coastal Zoning Ordinance (CZO), and other applicable sections of the County Code; however, the implementation programs of the Housing Element Update would not be implemented under the No Project Alternative. As such, future production of housing in the county would not be guided by principles that increase housing production for all income levels and strongly address fair housing goals to the same extent as required by the 6th Cycle RHNA and the Housing Element Update. Importantly, future housing production would not address the key housing issues in the county – including the cost of housing, jobs-to-housing imbalance, affordable housing, long-distance commuting, and disadvantaged communities – to the same extent as the Housing Element Update. Rather, under the No Project Alternative, future housing production would continue to rely on existing County policies and programs, which while effective, do not provide for the scope of actions and beneficial outcomes for meeting regional housing needs as those included in the Housing Element Update.

As described in Section 2.3.2, *Project Components*, the Housing Element Update assesses current and projected housing needs in the unincorporated areas of Santa Barbara County and provides an inventory of sites available for residential development to meet housing needs. In contrast, under the No Project Alternative, future residential development would be limited to pending housing projects (i.e., the 18 cumulative projects that have undergone environmental impact analysis pursuant to CEQA with planning permit in progress or approved, and building permit in progress or approved), ADU production, and buildout of vacant sites under the County's Comprehensive Plan and existing zoning ordinances. In particular, the No Project Alternative would not implement Program 1 of the Housing Element Update, which includes rezoning of sites to achieve the mandatory RHNA (Potential Rezone Program). In addition, the No Project Alternative would also not facilitate the development of housing on County-owned sites.

For the purposes of the No Project Alternative analysis, the residential unit development potential was estimated for sites identified in the sites inventory that could theoretically be developed in the absence of the proposed Project. As described in Section 2.3.2, *Project Components*, County staff identified 30 pending housing projects, including 18 projects identified as pending cumulative projects in Section 3.0.6, *Cumulative Impacts Analysis* (Table 3-8) that have undergone environmental impact analysis pursuant to CEQA with planning permit in progress or approved and building permit in progress or approved. These 18 cumulative projects involve 282 acres in the unincorporated areas

of the county. The potential housing units estimated for these 18 cumulative projects are based on the permit applications for these projects and amount to 1,331 new units countywide (483 units in the North County and 848 units in the South Coast; Table 2-10). County staff estimated the development of 800 ADUs in unincorporated areas of the county based on permitting records for ADUs (348 units in the North County and 452 units in the South Coast; Table 2-9). County staff has identified 370 vacant parcels zoned appropriately to support residential development, including up to 3,616 units in the North County and 528 units in the South Coast (Table 2-8). Further, County staff has identified 13 vacant parcels as part of the Potential Rezone Program that are currently zoned appropriately to support residential development under existing zoning regulations of the LUDC. These sites could allow for the potential development of up to 704 units in the North County and 146 units in the South Coast under existing zoning regulations under the No Project Alternative.[1] Based on the County's assessment of existing capacity for housing on identified vacant sites under existing zoning, ADU production, and 18 projects identified as pending cumulative projects, the No Project Alternative could support the development of up to 7,125 new residential units, with 5,151 units in the North County and 1,974 units in the South Coast. In addition, the buildout of identified vacant sites and pending residential development under existing zoning regulations under the No Project Alternative could result in the development of up to 1,924,475.8 square feet of commercial development with an estimated 1,910,101.0 square feet in the North County and 14,374.8 square feet on the South Coast. In total, without implementation of the Potential Rezone Program or development of County-owned sites, as facilitated under the proposed Project, the No Project Alternative is estimated to result in the development of 27,433 fewer residential units and 375,305 square feet more commercial space when compared to the proposed Project. This equates to an approximate 75.5 percent reduction in housing and a 24.2 percent increase in commercial development.

Aesthetics and Visual Resources

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Residential development would continue to be subject to the County's Comprehensive Plan, Community and Area Plans, zoning ordinances, and County Code. Future residential development under existing zoning on vacant sites would be subject to the County's design review and permitting process, which would ensure development is sited and designed to protect and enhance visual resources from public scenic vistas and State Scenic Highways. Future residential development would also be subject to requirements to help address any potential visual inconsistencies between new development and the existing character of scenic resources, including parameters for structural height, setbacks, building coverage, and design review. Specifically, Program 1, which relaxes development standards such as height, setbacks, and site development footprint in order to ensure that maximum densities can be achieved, and Program 2, which allows qualified affordable housing projects to be approved as use by right with no additional environmental or discretionary review, would not be adopted. As a result, ongoing residential development would be subject to existing development standards in the County's zoning code, which limit the visual impacts of new development. Therefore, impacts to aesthetics and visual resources under the No Project Alternative would be substantially less adverse than those described for the proposed Project in Section 3.1, *Aesthetics and Visual Resources,* and would be *insignificant*.

[1] As part of the sites inventory, the County identified Rezone Site No. 28 (Woodmere Villas HOA) as non-vacant, and developed with buildings and parking lots. However, the No Project Alternative buildout analysis considers maximum buildout of this site under the existing DR-3.3 zoning district.

Agricultural Resources

Under the No Project Alternative, agricultural properties in unincorporated areas of the county would not be rezoned for residential and mixed use development. In contrast with the proposed Project, no rezoning and/or conversion of agricultural land would occur on the South Coast. None of the parcels making up the South Patterson Agricultural Area and the San Marcos Agricultural Area, which are designated by the Eastern Goleta Valley Community Plan, would be rezoned under the No Project Alternative. These areas would continue to operate as urban agriculture with orchards, row crops, and greenhouses. The Glen Annie Golf Course would remain zoned for rural agricultural uses; however, it may continue to operate as a golf course. The agricultural properties in the Carpinteria Valley would remain zoned for urban agriculture and support existing greenhouses and row crops. Compliance with existing relevant Comprehensive Plan policies, the LUDC and the CZO, and the Uniform Rules would continue to limit future conversion of agricultural lands within the unincorporated areas of the county. As a result, impacts on agricultural resources under the No Project Alternative would be substantially less adverse than those described in Section 3.2, *Agricultural Resources* under the proposed Project, and would be *insignificant*.

Air Quality

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Similar to the proposed Project, ongoing development would result in short-term construction-related emissions and long-term operational emissions. However, the amount of growth and related emissions would be substantially less than the proposed Project.

As described in Section 3.3, *Air Quality*, the South Central Coast Air Basin (SCCAB) is currently in nonattainment for ozone (O_3) (for which ROCs and NO_x are precursors) and PM_{10} under federal and state standards. Two CalEEMod scenarios were prepared to estimate construction-related emissions from the largest potential development projects that could occur as a result of the proposed Project. Neither construction scenario would exceed Santa Barbara County Air Pollution Control District's (SBCAPCD's) recommended threshold of 25 tons per year (tpy) of combined reactive organic gases (ROG) and NO_x. Therefore, construction activities for smaller-scale residential development projects under the No Project Alternative would not be expected to exceed these recommended thresholds. Additionally, required compliance with SBCAPCD's limits on visible emissions (SBCAPCD Rule 302), emissions that generate a public nuisance (SBCAPCD Rule 303), and/or emissions that result in noncompliance with SBCAPCD's requirements and standards for visible dust (SBCAPCD Rule 345), as well as the County Grading Code would control PM_{10} and fugitive dust. Therefore, construction-related impacts associated with the No Project Alternative would be less adverse than those described in Section 3.3, *Air Quality,* and would be *insignificant*.

Similar to the proposed Project, residential development under the No Project Alternative would generate long-term operational emissions. Because the county is in nonattainment for O_3 and PM_{10}, these long-term operational emissions could contribute to the existing nonattainment status for these pollutants. However, without the Housing Element Update, including the Potential Rezone Program, it is anticipated that future residential development under the No Project Alternative would be substantially smaller than that described for the proposed Project, and growth would occur within existing plans and growth projections, including the Ozone Plan and the County's Land Use Element – Air Quality Supplement. Further, future housing projects would be subject to site-specific analysis per

SBCAPCD's air emissions thresholds. Therefore, operational impacts associated with the No Project Alternative would be substantially less adverse than those described in Section 3.3, *Air Quality*, and would be *insignificant*.

It should be noted that the No Project Alternative would not address the jobs-to-housing imbalance to the same extent as the proposed Project. The No Project Alternative would not provide substantial amounts of new and affordable housing opportunities for workers from the county's service, retail, and hospitality sectors to live and work in the county or closer to existing job centers. Therefore, the No Project Alternative would not be consistent to the same extent with the overall goals and strategies of the Ozone Plan and Land Use Element – Air Quality Supplement as the proposed Project.

Biological Resources

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations, including the County's adopted development standards for biological resource protection. Residential development would continue to be subject to the applicable policies and standards contained within the County's Comprehensive Plan, Community and Area Plans, the County's zoning ordinances, and other applicable regulations of the County Code. Future residential development under existing zoning on vacant sites would be subject to the County's design review and permitting process, which would ensure residential development is sited and designed to protect ESH, riparian corridors, wetlands, oak woodlands, and other sensitive habitats, and natural communities. For example, the County's Hillside and Watershed Protection Policies address development on slopes to minimize grading, disruption of natural vegetation, and erosion. Additionally, the Streams and Creeks Policies require that construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution. Several community plans also include policies and development standards for ESH, such as setbacks and construction requirements. Additionally, LUDC Chapter 35, Zoning includes development standards protecting biological resources, including Section 35.28.100, *Environmentally Sensitive Habitat Overlay*, Section 35.28.170, *Riparian Corridor – Goleta (RC-GOL) Overlay Zone*, and Article IX, *Deciduous Oak Tree Protection and Regeneration*. Continued compliance with these plans, policies, and regulations, would ensure that impacts to biological resources under the No Project Alternative would be substantially less adverse than those described in Section 3.4, *Biological Resources,* and would be *insignificant*.

Cultural Resources and Tribal Cultural Resources

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Federal, state, and County policies and regulations, including the County Comprehensive Plan, Community and Area plans, and the County's zoning ordinances, as well as CEQA and tribal consultation requirements under Assembly Bill (AB) 52 and Senate Bill (SB) 18, preserve and protect historic and pre-historic resources by requiring development projects avoid disturbance and/or preserve significant resources. Significant cultural and tribal cultural resources would be identified on a project-by-project basis through site-specific, onsite reconnaissance before approval of a development permit(s) (e.g., demolition permit, building permit) to avoid disruption, alteration, destruction, or adverse effects. The disposition of human remains is governed by the California Health and Safety Code Section 7050.5 and PRC Sections

5097.94 and 5097.98 and falls within the jurisdiction of the Native American Heritage Commission (NAHC). Overall, impacts on cultural resources and tribal cultural resources would be similar to but less adverse than those described in Section 3.5, *Cultural and Tribal Cultural Resources,* and would be *insignificant*.

Energy

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Ongoing development under the County's existing land use plans and policies would result in construction-related energy demand. Such energy demand is difficult to quantify as the details of construction, design/size, and timing of each future project are unknown. However, given the reduction in residential and mixed use development under the No Project Alternative, construction-related energy consumption would be reduced commensurately. As described for the proposed Project, future residential development under the No Project Alternative would also increase operational energy consumption. Given the reduction in residential and mixed use development under the No Project Alternative, operational energy consumption would also be reduced. Comparatively, the impacts related to energy under the No Project Alternative would be substantially less adverse than those described in Section 3.6, *Energy,* and would be *insignificant*.

Greenhouse Gas Emissions

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations, including current growth forecasts. Future development under existing land use plans and policies would generate short-term construction-related GHG emissions and long-term operational GHG emissions that would be substantially less than the proposed Project. As described for *Air Quality* above, two CalEEMod scenarios were prepared to estimate GHG construction-related emissions from the largest potential development projects that could occur as a result of the proposed Project (i.e., Rezone Site No. 1 [Giorgi] located on the South Coast and Rezone Site No. 19 [Key Site 1] located in the Santa Maria Valley), including mobile-source emissions (vehicle trips), area-source emissions (e.g., landscaping equipment), and energy-source emissions (electricity, natural gas). Even despite the highly conservative assumptions made in this analysis, GHG emissions estimated for the proposed Project would remain *insignificant* when compared to adopted thresholds. Therefore, construction-related and operational GHG emissions associated with smaller-scale residential and mixed use developments under the No Project Alternative would not be expected to exceed these recommended thresholds either. Impacts associated with the No Project Alternative would be less adverse than those described in Section 3.7, *Greenhouse Gas Emissions,* and would be *insignificant*. However, it should also be noted that the No Project Alternative would not address the jobs-to-housing imbalance to the same extent as the proposed Project. The No Project Alternative would not provide substantial amounts of new and affordable housing opportunities for workers from the county's service, retail, and hospitality sectors to live and work in the county or closer to existing job centers. Therefore, the No Project Alternative would not be expected to achieve the goals of the County's GHG emissions reduction plans (e.g., the 2022 Ozone Plan and the Draft 2030 Climate Action Plan) to the same extent as the Housing Element Update. Nevertheless, impacts associated with the No Project Alternative would remain *insignificant*.

Hazards and Hazardous Materials

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. As described for the proposed Project, demolition and construction activities associated with future residential development under the No Project Alternative would involve the use of common hazardous materials, including petroleum products, solvents, paints, and other regulated materials. The transport of these hazardous materials would continue to be subject to various federal, state, and local regulations, including California Vehicle Code Section 31602(b) and 32104(a). Similarly, the use, storage, and disposal of these hazardous materials would continue to be regulated under the Hazardous Waste Control Act (Title 26 of the California Code of Regulations [CCR]) by the California Department of Toxic Substances Control (DTSC) and the Santa Barbara County Fire Department (SBCFD). Following the completion of construction, residential uses do not generally involve the transport, use, disposal, or potential release of hazardous materials that could pose a significant hazard to the public or the environment. Impacts under the No Project Alternative would be similar to those described in Section 3.8, *Hazards and Hazardous Materials,* and would be *insignificant*.

Under the No Project Alternative, housing development could feasibly occur on properties that have been documented with prior releases of hazardous materials or wastes. This could include sites on the Cortese List under Government Code 65962.5 and/or former oil or gas pipelines or well facilities. However, there are a variety of existing regulatory processes, including Comprehensive Plan Seismic Safety and Safety Element and Hazardous Waste Element policies, as well as the County Code, that would serve to minimize these potential impacts. Additionally, existing federal, state, and local regulations address remediation requirements following the discovery of contamination (Section 3.8.3, *Regulatory Setting*). Impacts under the No Project Alternative would be similar to those described in Section 3.8, *Hazards and Hazardous Materials,* and would be *insignificant*.

Minimizing or avoiding risks to properties within an Airport Influence Areas (AIA) or Airport Land Use Compatibility Plan (ALUCP) Safety Zone involves the designation of areas around the ends of runways that must be free of objects or sensitive land uses, limiting certain densities of development within certain zones, and understanding historical accident patterns. Under the No Project Alternative, none of the unincorporated areas within the AIA or ALUCP Safety Zones would be rezoned for residential or mixed use development. Therefore, the No Project Alternative would avoid creating or exacerbating a public health and safety concern with airport operations. Impacts under the No Project Alternative would be substantially less adverse than those described for the proposed Project in Section 3.8, *Hazards and Hazardous Materials,* and would be *insignificant*.

Hydrology and Water Quality Resources

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. The construction of future residential development would be required to comply with the California Green Building Standards Code, which requires the incorporation of best management practices (BMPs) for materials and waste storage, handling, and equipment and vehicle maintenance and fueling to reduce the potential discharge of polluted runoff from construction sites to avoid degradation of surface waters. Future developments under the proposed Project that would disturb at least 1 acre would be required to adhere to the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (State

Water Resources Control Board [SWRCB] Order No. 2012-0006- DQA) to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) for construction activities. Further, all future residential development would be subject to the County's review of zoning, grading, and building permit applications. This would ensure compliance with the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance, Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), including the submittal of an Erosion and Sediment Control Plan for future projects with 50 cubic yards (cy) or more of grading (County Code Section 14-29), and the County's Stormwater Management Plan (SWMP). Additionally, future residential and mixed use development would be subject to the Municipal Stormwater NPDES Permit 2003-005-DWQ, General Permit No. CAS0000004 Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4) permit. Compliance with the NPDES and MS4 permits for future residential development under existing land use plans and policies would ensure the degradation of water quality from operational impacts would remain minimal and below established threshold limits for water quality standards. Impacts related to water quality under the No Project Alternative would be similar to those described for the proposed Project in Section 3.9, *Hydrology and Water Quality,* and would be *insignificant*.

As described for the proposed Project, future residential development under the No Project Alternative would increase demand for and pumping of groundwater in all groundwater basins. Increases in groundwater extraction would impact the level of supply available in the aquifers, especially in areas of scarce groundwater supplies and/or in areas where groundwater supplies make up the majority of the water source for domestic uses. However, current and future groundwater supply for groundwater basins subject to the Sustainable Groundwater Management Act (SGMA) are managed by their respective groundwater sustainability agencies (GSAs) and the programs and measurable objectives of the respective groundwater sustainability plans (GSPs). In these areas, sustainable management of groundwater supplies for domestic use is informed by projected increases in growth and domestic water demands based on regional growth forecasts. Implementation of the No Project Alternative would not result increase in domestic water use that would exceed projections utilized for informing necessary sustainability strategies and management actions of the GSPs. Future project applicants would be required to demonstrate that an adequate and approved water source is available for future residential or mixed use development via receipt of permission from appropriate agencies or owners of the rights to such water sources, pursuant to the SWRCB water rights. Therefore, impacts related to groundwater supply and potential conflicts with the implementation of a water quality control plan under the No Project Alternative would be substantially less adverse than those described for the proposed Project in Section 3.9, *Hydrology and Water Quality,* and would be *insignificant*.

Continued development of housing projects under the No Project Alternative would continue to result in substantial alterations to the existing drainage patterns of individual sites. However, all new development in special flood hazard areas would follow storm drain and drainage design requirements per County Code Chapter 15, which requires drainage designs of new development to be sized for peak 25-year runoff events and 100-year storms as well as requirements for onsite retention in compliance with NPDES. Before occupancy clearance, any development project that required additional conditions or requirements following the Flood Control District development review would be required to receive a Drainage Improvement Certification. With the implementation of these control measures and regulatory provisions to limit runoff from future new development sites, the proposed Project would not result in significant increases in runoff that would exceed the

capacity of existing or planned storm drain facilities. As previously described, all potential future development causing 1 acre or greater of ground disturbance or creating a certain amount of new or replaced impervious surfaces within the NPDES permit area would be required to comply with the NPDES MS4 permit, the County's SWMP, and RWQCB's Resolution R3-2013-0032, which would minimize impervious surfaces at a site, capture stormwater onsite, decrease surface water flows, and slow runoff rates all of which would mitigate the potential for onsite and offsite flood flows associated with housing development. Further, future development in a flood hazard area would be required to comply with the County Code Chapter 15A, Floodplain Management, 15B Development Along Watercourses, and policies of the County's Seismic Safety and Safety Element. These regulatory standards are designed to ensure future development of a site reduces or addresses flood hazards and prevents or regulates the construction of barriers that might unnaturally divert floodwaters or increase flood hazards in other areas. Impacts would be less adverse than those described for the proposed Project in Section 3.9, *Hydrology and Water Quality,* and would be *insignificant*.

Impacts related to flooding within coastal areas susceptible to tsunami and areas downstream of reservoirs and lakes that could be susceptible to flooding due to seiche would remain similar to those described for the proposed Project and would be *insignificant*.

Land Use and Planning

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Residential development would continue to be subject to the applicable policies and standards contained within the County's Comprehensive Plan, Community and Area Plans, the County's zoning ordinances, and applicable sections of the County Code. Through the County's land use and development permitting process, future residential and mixed use projects would only be approved if they are found to be consistent with the County's Comprehensive Plan and applicable policies and regulations. Additionally, the No Project Alternative would not physically divide an established community as it would not directly introduce land uses or new infrastructure (e.g., roads) that would physically or functionally conflict with existing land uses. Without implementation of the proposed Project, the existing land use designations, policies, and zoning standards set forth throughout the County would continue to apply. Therefore, physical impacts that potentially conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect under the No Project Alternative would avoid land use and planning impacts generated by the proposed Project from the projected location and scale of potential housing development, as described in Section 3.10, *Land Use and Planning*.

However, the No Project Alternative would not meet the County's obligations under state housing law, which requires that the County plan for and accommodate regional housing needs, and would not be consistent with state general plan law, which requires the County to adopt and implement a Housing Element as a part of its Comprehensive Plan. If State HCD determines that the County's Housing Element Update fails to substantially comply with state housing law, there are potentially serious consequences including limited access to state funding, as well as potential for lawsuits. When a jurisdiction's Housing Element is found to be out of compliance, its general plan is at risk of being deemed inadequate, and therefore invalid. If a jurisdiction is sued over an inadequate general plan, the court may impose requirements for land use decisions until the jurisdiction brings its general plan – including its Housing Element – into compliance with state housing law. As such, the No Project Alternative would be substantially inconsistent with state law and the County's Comprehensive Plan,

and therefore, impacts would be substantially more than the proposed Project and would be *significant and unavoidable*.

Noise

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Temporary noise would be generated from future construction activities related to pending and future development projects permitted consistent with existing zoning, including the modification or potential demolition of existing uses, construction of new residential developments, and other similar types of construction related to housing development. This would include onsite noise from heavy construction equipment, generators, power tools, and other sources of noise for various types of construction activities, as well as offsite noise from heavy haul trucks and construction worker commutes. Similar to the proposed Project, potential construction-related noise impacts on sensitive uses would be dependent on the relative distance of the sensitive use from construction activities. Additionally, construction-related noise would continue to be regulated by the Santa Barbara County Code of Ordinances (Chapter 14 Grading Restrictions; Ord. No. 4766, 11-9-2010), which states that grading work is prohibited between the hours of 7:00 p.m. and 7:00 a.m. (or as required within the land use permit). Additionally, construction-related activities would be required to comply with the local policies of adopted community plans (e.g., the Montecito Community Plan limits noise-generating construction activities to the hours between 7:00 a.m. to 4:30 p.m. Monday through Friday) and the County's permitting conditions for discretionary projects and development plans. Given the reduced amount and scale of development under the No Project Alternative, compliance with this existing regulatory framework would ensure that impacts associated with construction-related noise would be similar but less adverse than those described for the proposed Project in Section 3.11, *Noise,* and would be *insignificant*.

Operational roadway noise – particularly in the Eastern Goleta Valley and Carpinteria on the South Coast, Mission Hills and Vandenberg Village in the Lompoc Valley, Orcutt in the Santa Maria Valley, Santa Ynez in the Santa Ynez Valley, and New Cuyama in the Cuyama Valley – would be substantially reduced as compared to the proposed Project due to the reduced potential for housing development to be clustered on local roadways where increased traffic may noticeably increase roadway noise. For example, under the No Project Alternative, the South Patterson Agricultural Area and the San Marcos Agricultural Area would remain agricultural uses, which generate very low traffic volumes compared to the higher-density housing development facilitated under the proposed Project. Therefore, the increased transportation noise from ongoing development under existing land use plans would not likely exceed the County's noise threshold of 3 A-weighted decibels (dBA), which is the increase in noise level that is generally perceptible to the human ear, and impacts would be *insignificant*. Similar to the proposed Project, residential and mixed use development would not result in substantial increases in stationary operational noise sources and this impact would be *insignificant.*

Similar to the proposed Project, the construction of housing projects under the No Project Alternative could generate groundborne vibration, but vibration levels would not adversely affect sensitive receptors. Operational noise from stationary sources would not substantially affect sensitive receptors since, similar to the proposed Project, this alternative would result in residential and mixed use projects that do not generate high noise or vibration levels. Therefore, impacts related to groundborne vibration as well as stationary operational noise sources would remain *insignificant* similar to the proposed Project.

Some of the potential housing sites identified for rezoning under the Housing Element Update fall within an AIA. However, as described in Section 3.11, *Noise*, only 0.9 acres of existing vacant sites are located within the Santa Marina Airport 60-65 dB L_{dn} noise contour. Further, future development of these sites would be subject to noise compatibility analysis and may result in the exposure of future residents to high noise levels. No other existing vacant sites are located within the 60-65 dB L_{dn} noise contour for any of the airports within the county. Therefore, as compared to the proposed Project, which would rezone over 40 acres of land for residential uses within the 60-65 dB L_{dn} noise contour of the Santa Barbara Airport and the Santa Maria Airport, the No Project Alternative would result in substantially less adverse impacts. Impacts related to the exposure of new residents or workers to excessive airport noise would be *insignificant*.

Population and Housing

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. The growth anticipated under the No Project Alternative would be consistent with current regional growth forecasts prepared by SBCAG and the County. Therefore, since no land use changes would occur under the No Project Alternative and no new housing programs would be enacted to increase the production of housing, population growth, and housing development would occur consistent with current growth forecasts and impacts related to population growth under the No Project Alternative would be substantially less adverse than those described for the proposed Project in Section 3.12, *Population and Housing,* and would be *insignificant*.

There would be no displacement of existing people or housing associated with the No Project Alternative. The impact would be less adverse as compared to the proposed Project and would remain insignificant. However, current regional growth forecasts do not account for the effects of the mandatory 6th Cycle RHNA, which would increase the growth potential within Santa Barbara County consistent with the adopted 2023-2031 RHNA Plan. It should also be noted that the No Project Alternative would provide less housing diversity and would be less likely to accommodate affordable housing within the county, particularly within the jobs-rich South Coast where affordable housing is needed most. As a result, the *beneficial impacts* on population and housing under the proposed Project would not be realized under the No Project Alternative.

Public Services and Recreation

Under the No Project Alternative, future residential growth within the unincorporated county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Similar to the proposed Project, new residential and mixed use development under the No Project Alternative could increase the demand for fire protection services and police protection services as well as increase student enrollment in public schools. Minor increases in demand for library services would also be anticipated. Additionally, new housing development in areas that are currently underserved by adequate public parkland could exacerbate the demand for expanded parks, recreation, and trails. However, growth anticipated under the No Project Alternative would be consistent with current regional growth forecasts and substantially reduced as compared to the proposed Project.

Since the No Project Alternative would not substantially increase the development potential within existing communities, it is anticipated that existing Development Impact Mitigation Fees (DIMFs) would be sufficient to address impacts on public services, including maintaining existing firefighter

service ratios and response times. With existing DIMFs, impacts related to fire protection services, police protection services, and libraries under the No Project Alternative would be less adverse than those described for the proposed Project and would be *insignificant*. Similarly, as compared to the proposed Project, increases in enrollment within school districts throughout the county would be substantially reduced. In particular, the No Project Alternative would avoid the potential exceedance of capacities for school districts within the Santa Maria Valley and Cuyama Valley. The existing regulatory setting which includes mandatory mitigation impact fees, as well as the overall adequacy of school district capacities and the incremental nature of increases in student population, would ensure that potential impacts to school services and facilities under the No Project Alternative would remain *insignificant*.

As described in Section 3.13.2.2, *Parks and Recreation*, the unincorporated county's existing parkland-to-population ratio currently meets the County's adopted standard, with approximately 5.2 acres of parkland for every 1,000 persons. Future residential development under the No Project Alternative would continue to reduce the parkland-to-population ratio and could create a potential future shortfall of public parkland countywide. Additionally, the continued increases in demand could result in physical deterioration of existing recreational facilities. However, the increase in demand for recreational facilities under the No Project Alternative would be substantially reduced as compared to the proposed Project. The County currently has several policies in place that aim to preserve, expand, and fund recreational facilities. Ordinance 4317 enacts the Quimby Act, which requires that new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances). As described in Section 3.13.3, *Regulatory Setting,* the Quimby Act allows fees to be collected for up to 5 acres of parkland per 1,000 residents to serve the needs of residents of the subdivision and the greater public residing in the city or county. County Ordinance 4348 also imposes DIMFs for new residential development which does not involve the subdivision of land; fees are to be consistent with current Quimby Act fees. The Mello-Roos Community Facilities Act of 1982 and the Landscaping and Lighting Act of 1972 also help to ensure funding for the construction or maintenance of new or existing parks. Under the No Project Alternative, impacts would be less than those described for the proposed Project in Section 3.13, *Recreation* and Quimby Fees continue would ensure that potential impacts to parks and recreation from ongoing housing development under existing land use plans and policies would be *insignificant*.

Transportation

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur per regional transportation plans and existing adopted County transportation plans, policies, and regulations The growth anticipated under the No Project Alternative would be consistent with the projections anticipated in the Connected 2050 RTP/SCS and the regional growth forecasts prepared by SBCAG and the County. Future residential development under the No Project Alternative would be consistent with the Connected 2050 RTP/SCS, the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan, the Active Transportation Plan (ATP), the Santa Ynez Valley Bicycle Master Plan, the Comprehensive Plan Circulation Element, the County's community plans, and other local planning documents addressing transportation and circulation. Therefore, impacts related to potential conflicts with applicable regional transportation and existing adopted plans, policies, and regulations under the No Project Alternative would be substantially less adverse than those described for the proposed Project in Section 3.14, *Transportation,* and would be *insignificant*. However, it should also be noted that the No Project Alternative would not address the jobs-to-housing imbalance to the same

extent as the proposed Project. The No Project Alternative would not provide substantial amounts of new and affordable housing opportunities for workers from the county's service, retail, and hospitality sectors to live and work in the county or closer to existing job centers. Therefore, the No Project Alternative would not reduce VMT to the same extent as the proposed Project and would not be expected to achieve the goals of the County's GHG emissions reduction plans to the same extent as the proposed Project. A comparison of VMT per capita under the Future No Project (2031) and Future With Housing Element Update (2031) is provided in Table 3.14-9 in Section 3.14, *Transportation*.

Under the No Project Alternative, all future residential development projects would be subject to the County's development review and permitting process and would be subject to compliance with adopted standards and regulations. As described for the proposed Project, construction traffic associated with individual residential development projects would typically include heavy haul trucks, construction equipment delivery, and construction worker vehicles. Increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may temporarily disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. Construction traffic could also interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. Compared to the proposed Project, future housing development would be limited to existing residential sites and subject to the County's standards for construction traffic management and safety, which would ensure that construction-related transportation safety and geometric impacts are *insignificant*.

Compliance with the County's permitting standards and regulations would also ensure that roadways serving housing development under existing land use plans and policies would be adequate to serve the housing development. This includes compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details. These improvements commonly take the form of additional travel and turning lanes, intersection signalization and timing changes, bicycle lanes, sidewalks, pedestrian crossings, street lighting, and signage. Additionally, the County requires payment of DIMFs under County Code Chapter 23C, which contributes fair-share funding to offsite transportation improvements needed to serve regional growth. Given the scale of development under the No Project Alternative, compliance with these adopted standards and regulations would ensure that impacts related to operational geometric hazards would be less adverse than those described for the proposed Project in Section 3.14, *Transportation,* and would be *insignificant*.

Utilities and Water Supply

Under the No Project Alternative future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Similar to the proposed Project, future residential development under the No Project Alternative would continue to increase the demand for utilities and water supplies, which could necessitate the construction or expansion of utilities, such as water and wastewater facilities. With the increase in water demand and wastewater generation at a given location, individual projects may trigger the need for the construction of new laterals and/or the replacement/expansion of existing mains, pumps, and lift stations necessary to provide adequate water supply, water pressure, and wastewater conveyance. Consistent with Section 35.30.100 of the LUDC and corresponding sections of the MLUDC (35.430.100), the Article II CZO (35-60, 35-172.8, 35-174.7), and the Coastal Land Use Plan (CLUP) (Policy 2-6), future project applicants would be required to provide documentation demonstrating that adequate water and wastewater services are available

to serve the project. Therefore, impacts related to the construction, expansion, or replacement of utilities would be similar to those described in Section 3.15, *Utilities and Water Supply,* and would be *insignificant*.

Future residential development under the No Project Alternative would also be anticipated to result in increased water demand and wastewater generation. However, growth anticipated under the No Project Alternative would be consistent with previous regional growth forecasts and substantially reduced as compared to the proposed Project. Therefore, the increase in water demand and wastewater generation would be substantially reduced as compared to the proposed Project and would not exceed the capacity of water purveyors and wastewater treatment providers. All future residential development would be subject to existing policies and regulations, including those of the County Code and Comprehensive Plan, applicable Community and Area Plans, and local water purveyors' requirements for service. Under Section 35.30.100 of the LUDC and corresponding sections of the MLUDC (35.430.100), the Article II CZO (35-60, 35-172.8, 35-174.7), and the Coastal Land Use Plan (CLUP) (Policy 2-6), before issuance of a Land Use Permit or Zoning Clearance, the County must find that based on information provided by environmental documents, staff analysis, and the applicant, adequate public or private services and resources are available to serve a future development. On a project-by-project basis, this would help to ensure that individual housing projects would not adversely affect the reliability of water supplies or the service district's resources, or exceed the capacity of wastewater treatment providers in the county. With reduced growth projections, impacts related to the water demand and wastewater generation would be substantially less adverse than those described for the proposed Project in Section 3.15, *Utilities and Water Supply,* and would be *insignificant*.

New residential development allowed under the No Project Alternative would also increase solid waste generation in the county, resulting in increased demand for waste disposal and landfill services. However, as previously described, growth anticipated under the No Project Alternative would be consistent with previous regional growth forecasts and substantially reduced as compared to the proposed Project. Therefore, the increase in solid waste generation would be substantially reduced as compared to the proposed Project. As described in Section 3.15, *Utilities and Water Supply*, based on the estimated solid waste generated by residential and commercial development enabled under the Housing Element Update, existing regional landfills serving the unincorporated areas have adequate near-term capacity to serve additional development under the proposed Project. Several regional landfills in the county have begun planning for the expansion of existing facilities or the creation of new landfills to accommodate the growing solid waste disposal needs of the county. For example, completion of the Tajiguas Landfill Capacity Increase Project, as described above, would add 6.1 million cubic yards (cy) of capacity to the landfill and extend its closure date to 2038. Further, compliance with existing regulations, plans, and programs would reduce the amount of solid waste generated by future residential development that would be disposed at a landfill, reducing impacts associated with the capacity of landfills. Impacts related to solid waste generation would be substantially less adverse than those described for the proposed Project in Section 3.15, *Utilities and Water Supply,* and would be *insignificant*.

Wildfire

Under the No Project Alternative, future residential growth within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. As described in Section 3.16, *Wildfire*, Fire Hazard

Severity Zones (FHSZs) and WUI areas within the county have a high risk for wildfire due to the existence of excessive dry vegetation fuel, lack of adequate water for fire suppression, or lack of adequate access to firefighting and firefighting equipment. Under the No Project Alternative, future residential development would primarily occur in urban areas that are located outside of the FHSZs and WUI areas. Unlike the proposed Project, no unincorporated areas within the WUI would be rezoned for residential and mixed use development. As described in Section 3.16.3, *Regulatory Setting,* various plans, policies, regulations, and procedures apply to the construction, alteration, occupancy, and maintenance of structures that help to reduce wildfire risks. These include the California Fire Code (CFC), the California Building Code (CBC), the PRC, Chapter 10 and Chapter 15 of the County Code, SBCFD development requirements, and policies of the Seismic Safety and Safety Element of the Comprehensive Plan, which address the siting, construction, occupancy, and protection of development as it relates to wildfire hazards. Future residential development would be subject to compliance with existing regulations for the provision of defensible space around a structure (e.g., PRC Section 4291, Chapter 15 of the County Code). Under the No Project Alternative, sites within the High FHSZs and the WUI would not be rezoned for higher-density residential uses that could exacerbate wildfire risks, particularly within the foothills of the South Coast. Additionally, infrastructure (e.g., fuel breaks and emergency access roads) that may result in temporary or permanent impacts on the environment (e.g., vegetation clearing) would be reduced. Therefore, impacts related to wildfire under the No Project Alternative would be substantially less adverse than those described in Section 3.16, *Wildfire,* and would be *insignificant*. Impacts related to adopted emergency response plans or emergency evacuation plans would be similar to those described for the proposed Project and would remain *insignificant*. Additionally, the No Project Alternative would not substantially expose people or structures to significant post-wildfire risks. Impacts would be similar to those described for the proposed Project and would remain *insignificant*.

Conclusion and Relationship to Project Objectives

Under the No Project Alternative, the Housing Element Update would not be implemented by the County. This alternative would continue to allow new residential development under the existing applicable County plans and policy framework. However, future housing production within the county would not address changes to state housing law since the 5th Cycle 2015-2023 Housing Element and the County would not achieve the state-mandated 6th Cycle 2023-2031 RHNA. The No Project Alternative would not provide the necessary framework to promote affordable housing production in the County to the same extent as the proposed Project. For example, as described in Section 2.3.2, *Project Components,* the County increased its 2023-2031 RHNA for the lower- and moderate-income affordability levels by 15 percent, as recommended by the State. The projected growth in the Housing Element Update is 6,240 units (RHNA of 5,664 + a 15 percent buffer). While the No Project Alternative's potential buildout of 7,125 units would exceed this overall level of residential development, without the programs and incentives included in the Housing Element Update, the residential development enabled under existing zoning regulations would not achieve the state-mandated lower- and moderate-income affordability targets. Further, the majority of residential development under the No Project Alternative would occur within the North County, and residential development would fall short of the County's RHNA for the South Coast.

As a result, the No Project Alternative would eliminate the significant and unavoidable impacts associated with the proposed Project; however, the No Project Alternative would not achieve Project Objectives and would be inconsistent with state housing and general plan laws mandating the adoption and implementation of a Housing Element Update for the 6th Cycle RHNA.

4.5.2 Alternative 2 — Sustainable Communities Strategy

As described in Section 3.14, *Transportation,* the proposed Project has the potential to generate significant and unavoidable impacts on transportation because the potential future development would generate VMT in exceedance of the County's adopted thresholds. As further described therein, VMT impacts would be significant relative to countywide VMT per capita and regional VMT per capita for all HMAs in the North County, including Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley. Only the South Coast would support housing development enabled by the Housing Element Update that would not exceed the County's VMT per capita thresholds.

SBCAG's Connected 2050 RTP/SCS was developed according to the RTP Guidelines adopted by the California Transportation Commission and the requirements of SB 375 to: 1) explore the region's land use and travel patterns; 2) account for the demographic growth that would force new demands on both; and 3) present a vision for how they can work together to satisfy the goals important to the region while also meeting the state's GHG reduction targets. In particular, SB 375 calls for reductions in per capita GHG emissions, which are directly correlated with per capita VMT. While a range of options and possibilities exist for accomplishing the SB 375 targets, they all revolve around providing efficient transportation options and closing the gap between where people live and where they work or their most frequent travel destinations. VMT-efficient regions have land use patterns that place housing near jobs, which reduces the distance required for vehicle trips and supports active transportation modes, such as walking, biking, and transit as viable forms of transportation. In the county, the South Coast is more VMT-efficient than the North County due to the availability of jobs and active transportation, including the county's only HQTC area. Refer to Section 3.14, *Transportation*, for more information about the existing VMT setting for the proposed Project.

Similar to the proposed Project, the Sustainable Communities Strategy Alternative would plan for up to 34,558 housing units and 1,549,170.8 square feet of commercial development as part of mixed use development projects. The Sustainable Communities Strategy Alternative would not involve any changes to policies, programs, or assumptions that would affect buildout and housing capacity associated with existing vacant sites, ADU production, or pending housing projects (i.e., the 12 projects that have pre-application in progress but have not yet undergone environmental impact analysis under CEQA), as well as potential County-owned sites. However, to better align with Connected 2050 RTP/SCS and the SB 375 targets, the Sustainable Communities Strategy Alternative would revise the list of potential rezone sites to include only those sites within or proximate to the Hollister Avenue HQTC in the South Coast and sites within the Santa Maria Valley. The South Coast is the most VMT-efficient region in the county. While the Santa Maria Valley does not provide HQTC areas, it is the most VMT-efficient region in the North County.

Specifically, the following potential rezone sites considered under the proposed Project would be eliminated based on: 1) their location along the urban/rural boundary; 2) because they are not located within an HQTC; or 3) are otherwise located away from jobs/services within the county.

- South Coast Rezone Sites Eliminated from Potential Rezone Program
  - Site No. 11 (Glen Annie)
  - Site No. 12 (St. Vincent's – East)
  - Site No. 13 (St. Vincent's – West)
  - Site No. 15 (Van Wingerden 1)
  - Site No. 16 (Van Wingerden 2)
- North County Sites Eliminated from Potential Rezone Program
  - Site No. 32 (Fong 1)
  - Site No. 33 (Fong 2)
  - Site No. 34 (Alexander 1)
  - Site No. 35 (Chumash LLC)
  - Site No. 36 (Blue Sky Property)

Based on the Program EIR buildout assumptions presented in Chapter 3, *Environmental Impact Analysis*, the elimination of these sites would reduce the overall capacity of the sites inventory by 8,095 units and 242,411.4 square feet of commercial development. To make up for the difference and accommodate the RHNA plus the 15 percent buffer, the loss in housing capacity associated with these eliminated potential rezone sites would be reallocated and balanced within the South Coast and the Santa Maria Valley, which are the most VMT-efficient regions in the unincorporated areas of the county.

Given that this alternative would plan for the same number of dwelling units within fewer individual sites within the county, the Sustainable Communities Strategy Alternative would require amendments to the remaining potential rezone sites to increase residential capacity, which would entail increased density on potential rezone sites in the South Coast and the Santa Maria Valley. More specifically, the potential zoning of remaining rezone sites within or partially within the HQTC on the South Coast would be modified to accommodate 5,550 more units. Similarly, the potential zoning of remaining rezone sites within the Santa Maria Valley would be modified to accommodate 2,545 more units and 242,411.4 square feet of commercial uses. As described in further detail below, these amendments to the remaining rezone sites would likely increase the density of housing development and potentially building heights.

For this alternative, it is presumed that the relocated housing capacity would occur on sites that can physically accommodate increased density and building heights as necessary. Existing environmental or land use compatibility constraints affecting portions of the potential rezone sites under this alternative would require potential site zoning to direct development to appropriate locations within the sites. For instance, some rezone sites within the HQTC area on the South Coast are also located within Safety Zones 2 and 4 of the Santa Barbara Municipal Airport, and the maximum allowable density of these sites is constrained by the ALUCP. With this provision, the Sustainable Communities Strategy Alternative analysis assumes that the maximum capacity of constrained sites would be attained within denser and taller multifamily buildings with smaller development footprints as needed. The accommodation of 8,095 units and 242,411.4 square feet of commercial development would therefore be provided by increasing the potential density of the rezone sites that are located outside of these constrained areas.

Aesthetics and Visual Resources

Under the Sustainable Communities Strategy Alternative, the same components of the proposed Project would be implemented, but the RHNA plus 15 percent buffer would be accommodated within fewer potential rezone sites in only the South Coast and the Santa Maria Valley. The potential rezoning of sites in these HMAs would enable exactly the same amount of residential and mixed use development as the proposed Project. By eliminating sites from consideration, particularly those located along the urban/rural boundary and within the Rural Area, the Sustainable Communities Strategy Alternative would reduce the extent of impacts on scenic vistas and visual resources. For example, this alternative would eliminate Rezone Site No. 12 (St. Vincent's – East) and No. 13 (St. Vincent's – West), which are highly visible from State Route (SR) 154, which is a designated scenic highway and a visual gateway designated by the Eastern Goleta Valley Community Plan. This alternative would also eliminate Rezone Site No. 11 (Glen Annie), which would avoid the conversion of a golf course on agriculturally zoned land in the Rural Area from development to urban land uses, which would conflict with County policies for rural area visual resource and result in substantial

adverse effect on rural visual resource quality in the area. Eliminating these sites would reduce potential conflicts and visual impacts compared to the proposed Project.

However, similar to the proposed Project, the Sustainable Communities Strategy Alternative would include potential rezone sites in the urban area that could generate impacts related to inconsistency with County policy for visual and aesthetic resources. Condensing the housing enabled by the Housing Element Update within potential rezone sites in the Hollister Avenue HQTC and the Santa Maria Valley would result in taller building heights and greater densities of development than the proposed Project. Similar to the proposed Project, implementation of **MM AV-1 (Objective Development Standards for Multiple-Unit and Mixed Use Housing Projects)** would require the County to revise Section 35.31.020 (Multi-Unit and Mixed Use Housing Objective Zoning and Design Standards) of the LUDC to apply to multifamily housing projects on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law. This would help to ensure the protection of existing views from public vistas and State Scenic Highways. However, as described for the proposed Project in Section 3.1, *Aesthetics and Visual Resources*, this alternative would result in multifamily development projects that would be taller and denser than the existing visual environment which may conflict with plans and policies for visual resources; therefore, similar to the proposed Project, impacts would remain *significant and unavoidable*.

Regarding light and glare, by eliminating rezone sites within the Rural Area and consolidating development within the Urban Area, the Sustainable Communities Strategy Alternative would reduce potential adverse effects on nighttime views and night skies throughout the county. All development would continue to be subject to compliance with lighting standards of the County Code and site planning/design standards for light and glare. Therefore, impacts would be less adverse than those described for the proposed Project in Section 3.1, *Aesthetics and Visual Resources*, and would remain *insignificant.*

Agricultural Resources

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. This alternative would eliminate four sites from consideration for rezoning that support agricultural resources and/or agriculturally zoned lands ~~–~~ Rezone Site Nos. ~~Rezone Site Nos. 11 (Glen Annie) (which is zoned for agriculture though not in active agricultural operations),~~ 15 (Van Wingerden 1), 16 (Van Wingerden 2), and 36 (Blue Sky Property). By eliminating these sites, the Sustainable Communities Strategy Alternative would reduce impacts associated with the potential conversion of important farmland and existing agriculturally zoned lands to non-agricultural uses, including rural agricultural lands within the Coastal Zone (i.e., Rezone Site No. 15 [Van Wingerden 1] and Rezone Site No. 16 [Van Wingerden 2]). In total, the Sustainable Communities Strategy Alternative would avoid potential conversion of up to 157.36 acres of land zoned and actively utilized for agricultural uses, 12.94 acres of Farmland of Statewide Importance, 1.68 acres of Prime Farmland, and 9.67 acres of Unique Farmland, resulting in an approximate 8.5 percent reduction in the amount of Farmland Mapping and Monitoring Program (FMMP) land that could be converted to residential land uses under the proposed Project in the South Coast. However, as with the proposed Project, the Sustainable Communities Strategy Alternative would continue to result in the potential conversion of FMMP land, including portions of the South Patterson Agricultural Area and all of the San Marcos Agricultural Area in Eastern Goleta Valley. Therefore, impacts would be substantially less adverse compared to those described for the proposed Project in Section 3.2, *Agricultural Resources* but would remain *significant and unavoidable.*

Air Quality

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Under this alternative, there would be fewer potential rezone sites, but the zoning of the remaining sites would be modified to enable exactly the same amount of residential and mixed use development as the proposed Project. As described for the proposed Project, this alternative would not be potentially inconsistent with applicable air quality plans and impacts would be *insignificant*. Given that the amount of potential development would be the same as the proposed Project, impacts associated with the generation of criteria pollutant emissions during construction activities would be similar to those described for the proposed Project in Section 3.3, *Air Quality,* and could result in a cumulatively considerable net increase of a criteria pollutant that is in nonattainment in Santa Barbara County. However, because fewer potential rezone sites would accommodate more housing and mixed use development than the proposed Project, there would be fewer construction projects occurring under this alternative, which may reduce construction-related air emissions. **MM AQ-1 (PM_{10} and Dust Control)** would apply to substantially reduce construction emissions; however, given the scale and extent of potential development and the equipment estimated to be used to develop this alternative, construction emission impacts would remain *significant and unavoidable*, similar to the proposed Project.

The Sustainable Communities Strategy Alternative would reduce mobile-source criteria air pollutant emissions as it would relocate housing within or proximate to the Hollister Avenue HQTC in the South Coast and sites within the Santa Maria Valley, which are the most VMT-efficient regions in the unincorporated areas of the county. This consolidation of residential development in more VMT-efficient regions would reduce countywide average daily trips (ADT) and total VMT as compared to the proposed Project, thereby reducing mobile-source criteria pollutant emissions when compared to the proposed Project. Nevertheless, the Sustainability Communities Strategies Alternative could still contribute to the existing nonattainment status for these pollutants. Attachment A of SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (2022) includes a screening table list of common land uses the most common types of land uses and estimates the size of a specific project type that is expected to be less than the threshold of significance for ROC and NO_x emissions from vehicles. Based on this table, individual residential development projects involving greater than 290 detached single-family dwellings (SFDs) with a density of 3 dwelling units per acre (du/ac) or a project involving 400 multifamily dwellings (MFDs) with a density of 16 du/ac are anticipated to result in operational emissions exceeding SBCAPCD's operational mobile-source emissions thresholds. Similar to the proposed Project, **MM AQ-2 (Project Screening and Project-Specific Air Quality Evaluation)** would help ensure housing projects enabled under this alternative would substantially reduce operational emissions. Further, **MM T-1 (Site-based TDM)** would reduce project-based VMT and associated mobile source emissions. However, operational criteria pollutant emissions under this alternative would remain *significant and unavoidable*.

The housing enabled under the Sustainable Communities Strategy Alternative could expose sensitive receptors to substantial pollutant concentrations. However, the implementation of **MM HAZ-1 (Environmental Site Assessment)** and **MM AQ-4 (Project Siting and Interior Air Quality Protection)** would reduce these impacts to an *insignificant* level, similar to the proposed Project.

This alternative would involve residential and mixed use development within urbanized areas and would not generate odors or emissions adversely affecting substantial numbers of people or sensitive

receptors, and odor impacts would be similar to those described for the proposed Project in Section 3.3, *Air Quality,* and would remain *insignificant*.

Biological Resources

The Sustainable Communities Alternative would involve the same components of the Housing Element Update but with a modified list of potential rezone sites, which would eliminate some sites that are known to contain sensitive biological resources such as ESH, chaparral, oak woodlands, and native grasslands. The elimination of sites under this alternative could reduce impacts to sensitive habitats and special-status species. For example, Rezone Site No. 13 (St. Vincent's – West) includes designated ESH associated with chaparral habitat, while Rezone Site No. 32 (Fong 1) and No. 33 (Fong 2) consist of vacant sites immediately adjacent to the Burton Mesa Ecological Reserve and may support highly sensitive vegetation communities and habitat. As a result, the elimination of 10 sites for consideration under the Potential Rezone Program would reduce impacts to sensitive biological resources. The Sustainable Communities Strategy Alternative would continue to enable residential and mixed use development within other sites that support sensitive biological resources. Therefore, even with the implementation of **MM BIO-1 (Tree Protection Plan), MM BIO-2 (Habitat Protection Plan), and MM BIO-3 (Wildlife Movement Plan)** described in Section 3.4, *Biological Resources*, impacts on sensitive biological resources and potential conflicts with adopted local plans, policies or ordinances oriented toward the protection and conservation of biological resources would be similar to those described for the proposed Project and would remain *significant and unavoidable.*

Cultural Resources and Tribal Cultural Resources

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Implementation of this alternative and elimination of 10 potential rezone sites from consideration would not avoid or substantially reduce impacts on cultural resources, including prehistoric and historic archaeological resources, historic resources, and tribal cultural resources. Rezone Site Nos. 11 (Glen Annie), 15 (Van Wingerden 1), 16 (Van Wingerden 2), and 36 (Blue Sky Property) consist of agriculturally zoned lands that are either nonvacant and support existing improvements or are highly disturbed as a result of active agricultural operations. Under this alternative, housing sites could contain known or unknown historic resources and/or buried archaeological resources that could be encountered, disturbed, or destroyed as part of the construction of future residential and mixed use development. As described for the proposed Project, any future development under the Sustainable Communities Strategy Alternative would be required to comply with applicable federal, state, and local policies and regulations that concern the preservation of historical resources and its regulations governing demolition. With the implementation of **MM CTCR-1 (Modified from County Standard Mitigation Measure [CSMM] CulRes-10) (Preservation), MM CTCR-2 (Archaeological Surveys), MM CTCR-3 (Stop Work at Encounter), and MM CTCR-4 (Encountering Human Remains)** described in Section 3.5, *Cultural and Tribal Cultural Resources*, impacts to cultural resources and tribal cultural resources would be similar to those described for the proposed Project, and would remain *significant but mitigable*.

Energy

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Under this alternative, there would be fewer potential rezone sites, but the zoning of remaining sites would be

modified to enable the same about of residential and mixed use development as the proposed Project. Given the amount of potential development would be the same, impacts associated with the use or commitment of energy resources during construction and operation for the Sustainable Communities Strategy Alternative would be similar to those described for the proposed Project in Section 3.6, *Energy,* and would remain *insignificant.* Additionally, as described for the proposed Project, this alternative would conform to the applicable plans, policies, and regulations regarding energy conservation relative to housing development and impacts would remain *insignificant*.

Greenhouse Gas Emissions

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Under this alternative, there would be fewer potential rezone sites, but the zoning of remaining sites would be modified to enable exactly the same amount of residential and mixed use development as the proposed Project. Given the amount of potential development would be the same, impacts associated with the generation of GHG emissions during construction would be similar to those described for the proposed Project in Section 3.7, *Greenhouse Gas Emissions*, and would not have a significant impact on the environment. Impacts would remain *insignificant.*

The Sustainable Communities Strategy Alternative would reduce mobile-source GHG emissions as it would relocate housing within or proximate to the Hollister Avenue HQTC on the South Coast and sites within the Santa Maria Valley, which are the most VMT-efficient regions in the unincorporated areas of the county. This consolidation of residential development in more VMT-efficient regions would reduce countywide ADT and total VMT compared to the proposed Project, thereby reducing mobile-source GHG emissions and per capita GHG emissions when compared to the proposed Project. Importantly, this alternative would align substantially more with Connected 2050 RTP/SCS and the SB 375 targets as compared to the proposed Project. Impacts related to operational GHG emissions would be less than those described for the proposed Project in Section 3.7, *Greenhouse Gas Emissions*, and would remain *insignificant*.

Hazards and Hazardous Materials

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. None of the 10 potential rezone sites eliminated under this alternative include known hazardous sites. However, Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) are commercial agricultural properties that may contain unknown hazards commonly found in other agricultural areas of the county (e.g., pesticides/herbicides) and therefore have the potential to involve disturbance of existing soil contamination. Similar to the proposed Project, residential and mixed use development could still feasibly occur on properties that have experienced prior releases of hazardous materials or wastes. Disturbance of contaminated surface soils or groundwater or the release of hazardous building materials could subject workers, neighboring land uses, and future residents to hazardous substances. Overall, the impacts related to hazards and hazardous materials under the Sustainable Communities Strategy Alternative are similar to those described for the proposed Project. With the implementation of **MM HAZ-1 (Environmental Site Assessment)** and **MM HAZ-2 (Incidental Discovery of Contamination)** described in Section 3.8, *Hazards and Hazardous Materials*, impacts would remain *significant but mitigable*.

None of the rezone sites that would be eliminated under this alternative are located within or partially within the ALUCP Safety Zones of concern for Santa Barbara Airport and Santa Maria Airport. As such, this alternative would not directly avoid or reduce impacts associated with airport safety as described in Section 3.8, *Hazards and Hazardous Materials.* Conversely, by eliminating these sites and consolidating potential development within the remaining rezone sites within the South Coast and Santa Maria Valley, the Sustainable Communities Strategy Alternative has the potential to increase potential airport safety hazards and conflicts with the ALUCPs for the Santa Barbara Municipal Airport and Santa Maria Airport. Many of the remaining rezone sites located within the HQTC of the South Coast and within Orcutt are located within Safety Zones 2 and 4 of these airports. While specific sites and revised densities are not identified for the remaining rezone sites to make up the balance for the eliminated rezone sites as part of this alternative, it is possible that nearly all remaining rezone sites, including those within and outside of Safety Zones 2 and 4, would require increases in potential densities to accommodate the balance. For this alternative, it is presumed that the relocated housing capacity would occur on sites that can physically accommodate increased density and building heights as necessary. Existing environmental or land use compatibility constraints affecting portions of the potential rezone sites under this alternative would require potential site zoning to direct development to appropriate locations within the sites. For instance, some rezone sites within the HQTC area on the South Coast are located within Safety Zones 2 and 4 of the Santa Barbara Airport, and the maximum allowable density of these sites is constrained by the ALUCP. The Sustainable Communities Strategy Alternative analysis assumes that the maximum capacity of constrained sites would be attained within denser and taller multifamily buildings with smaller development footprints to the extent required to accommodate the same amount of housing and commercial development as the proposed Project. The accommodation of 8,095 units and 242,411.4 square feet of commercial development would therefore be provided by increasing the density of the rezone sites that are located outside of these constrained areas. Nevertheless, with the implementation of **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)**, impacts related to airport hazards would be similar to those described for the proposed Project in Section 3.8, *Hazards and Hazardous Materials*, and would remain *significant but mitigable.*

Hydrology and Water Quality Resources

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. The Sustainable Communities Strategy Alternative would enable the development of housing sites where impacts to surface or groundwater quality could occur, including previously undeveloped (i.e., vacant) or agricultural sites and sites adjacent to creeks or drainages. However, the potential impacts would be substantially reduced due to the elimination of some sites that could adversely affect water quality if developed with housing. For example, the elimination of Site Nos. 11 (Glen Annie), 12 (St. Vincent's – East), 13 (St. Vincent's – West), and 16 (Van Wingerden 2) from consideration as part of the Potential Rezone Program avoid development along minor unnamed ephemeral drainages and Franklin Creek in the Carpinteria Valley. By avoiding rezoning and development of these sites, the Sustainable Communities Strategy Alternative would reduce impacts associated with extensive soil disturbance from construction activities. Further, the elimination of Rezone Site Nos. 11 (Glen Annie), 15 (Van Wingerden 1), 16 (Van Wingerden 2), 35 (Chumash LLC), and 36 (Blue Sky Property) from consideration as part of the Potential Rezone Program would reduce the potential for groundwater contamination. As described for the proposed Project, the potential for groundwater contamination would be higher for potential development sites located near or adjacent to water courses and overlying groundwater basins. Under the Sustainable Communities Strategy Alternative, potential

rezone sites, such as Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3) would continue to be included for consideration and would present a risk for groundwater contamination. However, as described for the proposed Project, the County reviews all related development permits to ensure compliance with the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance (Ord. No. 4766, 11-9-2010), Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), and the County's SWMP, if applicable. Mandatory compliance with these measures would ensure development enabled under this alternative would not pollute surface or groundwater resources. Impacts on water quality would be reduced when compared to those described for the proposed Project in Section 3.9, *Hydrology and Water Quality,* and would remain *insignificant.*

Concerning groundwater supplies and management, the elimination of some rezone sites in Santa Ynez Valley, Cuyama Valley, and Lompoc Valley from consideration as part of the Potential Rezone Program would reduce impacts to specific groundwater basins. For instance, the Cuyama Valley groundwater basin is designated high-priority and serves as the sole source of potable water supplies for the Cuyama Valley. By eliminating Rezone Site No. 36 (Blue Sky Property), the Sustainable Communities Strategy would substantially reduce impacts on groundwater supplies of this basin. Similarly, by eliminating Rezone Site Nos. 32 (Fong 1), 33 (Fong 2), 34 (Alexander 1), and 35 (Chumash LLC), the Sustainable Communities Strategy would substantially reduce impacts on the groundwater supplies of the Santa Ynez River Valley groundwater basin, a medium-priority basin. The residential and commercial development for these sites would be shifted to rezone sites in the Orcutt area which also relies on groundwater supplies for the majority of its domestic water supplies. Increasing the amount of potential development in this area would increase groundwater extraction for municipal use, and therefore potentially increase groundwater pumping when compared to the proposed Project. The same would be true for the South Coast, where Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) receive a portion of domestic water from the high-priority Carpinteria groundwater basin. The elimination of these sites would be accommodated by increasing the potential density of sites within the HQTC, which largely overlies the Goleta Basin. The Santa Maria River Valley and Goleta Groundwater Basins are designated low and very low priority by the California Department of Water Resources (DWR), respectively. The concentration of potential development in these areas would increase the demand for groundwater supplies when compared to the proposed Project. However, as described in Section 3.9, *Hydrology and Water Quality,* given the adjudication status of these basins and management strategies employed by the respective water agencies or service providers, the Sustainable Communities Strategy Alternative and the increase in development in these areas would not substantially increase potential demand or extraction of groundwater supplies such that supplies would be substantially reduced. As a result, the Sustainable Communities Strategy Alternative would create more consistent land use patterns with adopted or pending GSPs and avoid impacts with GSPs for basins that experience significant overdrafts including the Cuyama Valley and Santa Ynez River Valley groundwater basins. Overall, the Sustainable Communities Strategy Alternative would substantially reduce impacts on groundwater supplies for the Cuyama Valley and Santa Ynez River Valley groundwater basins due to the elimination of rezone sites overlying these basins. Therefore, impacts related to groundwater supply and would be substantially less than those described for the proposed Project and would be *insignificant*.

As described for the proposed Project, implementation of this alternative would increase the area of impervious surfaces and could potentially impact groundwater recharge, particularly within the Goleta basin. However, new development causing 1 acre or greater of ground disturbance or creating a certain amount of new or replaced impervious surfaces within the NPDES permit area would be

required to comply with the NPDES MS4 Permit; State Water Board Construction General Permit, as applicable; and the Flood Control District's Standard Conditions of Project Plan Approval (Standard Conditions), which stipulate certain requirements for onsite surface retention and underground stormwater chambers depending on the size of the project to reduce post-development peak stormwater runoff and encourage groundwater recharge. Additionally, the County's compliance with state and local regulations governing water quality would ensure that development projects use BMPs that would limit impacts where future projects have the potential to impact groundwater recharge. Further, future development is not expected to interfere with potential recharge projects due to the expansive nature of recharge aquifers and the relatively small scale of potential housing sites. This alternative eliminates Rezone Site No. 11 (Glen Annie), which is located within the West Subbasin Recharge Area identified by the Goleta Water District. Impacts would remain similar to those described for the proposed Project and would be *insignificant*.

The elimination of these rezone sites from consideration as part of the Potential Rezone Program would decrease the potential for residential and mixed use development within a Federal Emergency Management Agency (FEMA) Special Flood Hazard Area. Nevertheless, the Sustainable Communities Strategy Alternative continues to consider rezone sites located within areas of special flood hazards, and the implementation of flood hazard development standards and **MM HWR-1 (Flood Attenuation and Development Standards)** would continue to be required to ensure that this impact would remain *potentially significant but mitigable*. Impacts related to flooding within coastal areas susceptible to tsunami and areas downstream of reservoirs and lakes that could be susceptible to flooding due to seiche would remain similar to those described for the proposed Project and would be *insignificant*.

Similar to the proposed Project, implementation of this alternative would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater water quality. The proposed Project would not substantially inhibit groundwater recharge. Further, the proposed Project would not substantially increase the risk of release of pollutants in the event of inundation by flood hazards, tsunamis, and seiche. Similar to the proposed Project these impacts would remain *insignificant*.

Land Use and Planning

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. As described in Section 3.10, *Land Use and Planning,* the proposed Project and sites inventory would not result in the division of an established community. The modified list of rezone sites involving the elimination of 10 rezone sites from consideration and balancing of potential development within the South Coast and Santa Maria Valley would similarly not divide an established community, and impacts would remain *insignificant.*

Concerning consistency with plans and policies, the Sustainable Communities Strategy Alternative and modified Potential Rezone Program would result in potentially greater consistency with certain plans and policies, and potentially greater inconsistencies with others. The Sustainable Communities Strategy Alternative would be substantially more consistent with SB 375, SBCAG's Connected 2050 RTP/SCS, and the County's ATP, which all prioritize housing in VMT-efficient regions of the county. This alternative's main purpose is to relocate potential housing development out of VMT-inefficient areas and into the county's most VMT-efficient areas, including the Hollister Avenue HQTC in the South Coast and the Santa Maria Valley. Compared to the proposed Project, this alternative would

substantially reduce countywide and regional VMT and support active transportation strategies to enable potential housing development near jobs and with access to transit and multi-modal transportation facilities.

Additionally, by eliminating select rezone sites which could enable potentially larger development on vacant sites or in less developed regions of the county, the Sustainable Communities Strategy Alternative could avoid potential inconsistency with plans and policies adopted for the purpose of protecting natural resources. As an example, Lompoc Interpretive Guidelines Policy A-11 and A-12 of the Comprehensive Plan govern development in the unincorporated area of Lompoc Valley to protect scenic resources and public views. By eliminating Rezone Site Nos. 32 (Fong 1), 33 (Fong 2), and 34 (Alexander 1), which are highly visible sites adjacent to natural areas, the Sustainable Communities Strategy Alternative would be potentially more consistent with these policies. Policy EGV-4.1 of the Eastern Goleta Valley Community Plan includes similar standards to ensure that new development complements existing development and enhances aesthetics and viewsheds. The elimination of Rezone Site No. 11 (Glen Annie) would reduce potential policy inconsistencies associated with large-scale development in a natural, highly visible area in the Rural Area.

While eliminating these sites would improve consistency with regional VMT goals and natural resource protection policies, the potential reallocation of development of these sites to the Urban Area within the South Coast and Santa Maria Valley would increase the potential site densities in these areas and would present potentially greater inconsistencies with policies protecting community character and aesthetics, due to the potential for even greater site development, building heights, and land use incompatibility. Further, as discussed in *Noise* below, the Sustainable Communities Strategy Alternative may also result in potentially greater inconsistencies with policies adopted for protecting sensitive activities from airport-related noise. By consolidating potential development associated with rezone sites within the Eastern Goleta Valley, the Sustainable Communities Strategy Alternative would potentially increase the number of new units that would be subject to airport noise levels of 60-65 dB generated by the Santa Barbara Municipal Airport, thereby creating a potentially greater inconsistency with Policies 3, 4, and 13 of the Noise Element. Further, as discussed in the *Utilities and Water Supply* discussion below, this alternative could result in greater impacts on utility services and infrastructure within the South Coast and Santa Maria Valley, resulting in potentially greater inconsistency with policies adopted to ensure adequate water supplies and services to serve potential development (e.g., Land Use Development Policy 4 of the Land Use Element, Policies SF-EGV-1.1, SF-EGV-1.2, WAT-EGV-1.1, and WAT-EGV-1.2 of the Eastern Goleta Valley Community Plan, Policies WW-O-2, WAT-O-2, DevStd Wat-O-2.1, and DevStd Wat-O-2.2 of the Orcutt Community Plan). Reducing the amount of potential development in Santa Ynez Valley would result in potentially greater consistency with similar policies of the Santa Ynez Valley Community Plan. Overall, the Sustainable Communities Strategy Alternative would be substantially more consistent with regional VMT and natural resource plans and policies, including the Connected 2050 RTP/SCS, the County's ATP, and the County's Comprehensive Plan. Policy inconsistencies would be limited to airport noise compatibility issues for potential housing development in the AIA of either Santa Barbara Airport or Santa Maria Airport, and community design and aesthetics policies in the Eastern Goleta Valley and Orcutt. Therefore, while this alternative would be substantially more consistent with applicable plans and policies, key inconsistencies would continue to result in *significant and unavoidable* impacts, similar to the proposed Project.

Noise

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Elimination of potential rezone sites under this alternative would not have a substantial effect or reduction on overall noise impacts. Construction activities associated with future residential and mixed use development under the Sustainable Communities Strategy Alternative would result in a temporary increase in noise levels in the vicinity of individual project sites or clusters of such sites. The elimination of 10 rezone sites would avoid construction-related noise impacts in the vicinity of these sites, thereby reducing potential construction-noise impacts where the eliminated rezone sites were located in proximity to existing noise-sensitive uses, such as Rezone Site Nos. 32 (Fong 1), 33 (Fong 2), and 34 (Alexander 1), which are located directly adjacent to existing residential uses; however, this alternative would continue to result in construction-related noise levels above 65 dBA L_{eq} for remaining sites. For example, in Eastern Goleta Valley, construction activities in the San Marcos Agricultural Area (Rezone Site Nos. 8, 9, 10, and 17) could generate noise that would adversely affect the adjacent residential neighborhoods to the west and south. Overall, the temporary construction impacts under the Sustainable Communities Strategy Alternative would likely be reduced as compared to those described for the proposed Project due to a reduction in the number of potential rezone sites. With the implementation of **MM NOI-1 (Construction Hours) and MM NOI-2 (Noise Study and Site-based Attenuation)** described in Section 3.11, *Noise*, impacts would remain *significant but mitigable*.

Concerning operational noise, the Sustainable Communities Strategy Alternative would reduce noise along roadways in the unincorporated communities of Mission Hills, Vandenberg Village, Santa Ynez, Carpinteria, and New Cuyama as compared to the proposed Project. However, by increasing the concentration of residential and commercial development in the South Coast and Santa Maria Valley, the Sustainable Communities Strategy could potentially increase noise levels along arterial roadways in those regions, particularly along Hollister Avenue in Eastern Goleta Valley and Clark Avenue in Orcutt. While this alternative would move residential development out of quieter communities in the Lompoc Valley, Santa Ynez Valley, and Cuyama Valley and concentrate the development of residential uses within existing noise environments along high-volume highways and roadways, the implementation of site-based noise studies and attenuation features required by **MM NOI-2 (Noise Study and Site-based Attenuation)** would ensure that this impact would remain *significant but mitigable* as described for the proposed Project.

As described for the proposed Project, this alternative would also potentially expose new residents or workers to excessive airport noise, but to a potentially greater degree than the proposed Project. With the concentration of potential development within the Eastern Goleta Valley and Orcutt under this alternative, there would be a potential increase in the number of residential units within the 60-65 dB L_{dn} noise contour of the Santa Barbara Airport and Santa Maria Airport due to an increase in the potential densities of sites within the 60-65 dB L_{dn} noise contour. Therefore, impacts related to airport noise would be greater than those described for the proposed Project. However, as described for the proposed Project, impacts would remain *significant but mitigable* with the implementation of **MM NOI-2 (Noise Study and Site-based Attenuation)**.

Similar to the proposed Project, the construction of housing projects could generate groundborne vibration, but vibration levels would not adversely affect sensitive receptors. Operational noise from stationary sources would not substantially affect sensitive receptors since, similar to the proposed Project, this alternative would result in residential and mixed use projects that do not generate high

noise or vibration levels. Therefore, impacts related to groundborne vibration as well as stationary operational noise sources would remain *insignificant* similar to the proposed Project.

Population and Housing

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Under this alternative, there would be fewer potential rezone sites, but the zoning of remaining sites would be modified to enable the same amount of residential and mixed use development as the proposed Project. Therefore, as described for the proposed Project, this alternative would induce unplanned population growth, and impacts would remain *significant and unavoidable.* Additionally, impacts related to the displacement of existing people or housing would be similar to those described for the proposed Project and would remain *insignificant*.

Public Services and Recreation

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Under this alternative, there would be fewer potential rezone sites, but the zoning of remaining sites would be modified to enable exactly the same amount of residential and mixed use development as the proposed Project. As described for the proposed Project, this alternative would result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause *significant* environmental impacts. Additionally, this alternative would result in *insignificant* impacts related to police protection services, school enrollment, and libraries. For school enrollment in particular, this alternative would avoid the potential exceedance of capacities for school districts within the Cuyama Valley but would increase the potential exceedance of capacities for school districts within the Santa Maria Valley. Nevertheless, SB 50 outlines development fees that are required to be paid by future development before the issuance of building permits. These fees would be used to offset the impact of the additional students through funding modernization, construction, and/or expansion of school facilities. Under Government Code Section 65995.5, payment of developer fees constitutes full mitigation of impacts to schools.

The County currently has several policies in place that aim to preserve, expand, and fund recreational facilities. Ordinance 4317 enacts the Quimby Act locally, which requires that new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances). However, the collection of in-lieu fees alone would not address the increased demand for parkland and would not sufficiently ensure the recreation needs are met within communities with limited public parkland, particularly within the Eastern Goleta Valley where housing development within the South Coast would be concentrated. The concentration of housing development within the Santa Maria and South Coast HMAs, where access to and availability of parklands in relation to proposed housing sites is more constrained, would result in a more concentrated, adverse impact than the proposed Project. As described for the proposed Project, the implementation of **MM LU-1 (Amendments to Design Residential [DR] Zoning)** would partially mitigate impacts through an amendment to Program 1 of the Housing Element Update to allow public parkland as part of required open space on sites zoned DR. While this mitigation measure would not require the dedication of public parkland as part of housing projects, it would create the opportunity for housing projects to dedicate public parkland to serve both project and community demands for recreation facilities. However, despite the implementation of this mitigation measure, impacts on recreation facilities would remain *significant*. Existing standards and fees used to secure recreational improvements to serve communities would

not be sufficient to ensure adequate public parklands are provided to serve the existing county resident population and residents of the Project. Impacts to recreation and would be more adverse than the proposed Project.

Transportation

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. The Sustainable Communities Strategy Alternative would result in the same amount of potential development as the proposed Project but development associated with the rezone sites would be concentrated within the South Coast (i.e., the Eastern Goleta Valley) and the Santa Maria Valley (i.e., Orcutt), which are the most VMT-efficient areas of the county, providing regional job centers with proximity to existing services and neighborhoods and support for active transportation modes, including the county's only HQTC located in the South Coast. The goal of the Sustainable Communities Strategy Alternative is to better align with the overarching goals and objectives of SB 375 and the Connected 2050 RTP/SCS to foster growth and transportation improvements in a manner that protects natural resources, encourages mixed use development, focuses future growth within existing urbanized areas, reduces or limits new trip generation and VMT, provides equitable access to transit and alternative transportation, and reduces traffic congestion. By prioritizing the development of higher-density, multifamily, affordable housing in urban infill sites in the most VMT-efficient areas of the county, the Sustainable Communities Strategy Alternative would be more consistent with these goals and objectives, as well as those of the Santa Barbara U.S. Highway 101 Multimodal Corridor Plan and SBCAG's Regional Active Transportation Plan. However, given this alternative would facilitate the same amount of potential development as the proposed Project, but consolidate that development in specific regions, the Sustainable Communities Strategy Alternative would result in similar impacts relative to consistency with the County's Comprehensive Plan Circulation Element. **MM T-1 (Site-based TDM)** and **MM T-3 (Funding and Mitigation Fee Programs)** would help reduce project-specific VMT and further ensure regional transportation demand management and multi-modal infrastructure planning are conducted and funded by the County in combination with other agencies to provide a transportation system that sufficiently serves the projected growth and development Therefore, impacts associated with consistency with transportation-based plans and policies would be substantially less than those described for the proposed Project, and would remain *significant but mitigable.*

Table 4-3 presents the VMT results for the Sustainable Communities Strategy Alternative in comparison to the Future with Housing Element Update (2031) scenario. In the South Coast, the housing growth located within the potential rezone sites would occur within the transit priorities areas adjacent to the Hollister Avenue HTQC. Relocating the housing growth in the rezone sites to be closer to transit reduces the South Coast total VMT by 5 percent and the total VMT per service population by 4 percent in comparison to the proposed Project. Given that 41 percent of the total VMT in the unincorporated county is generated in the South Coast, this reduction in total VMT results in an overall reduction in countywide VMT with both total VMT and total VMT per service population decreasing by 1 percent in comparison to the proposed Project.

Table 4-3. Sustainable Communities Strategy Alternative Vehicle Miles Traveled per Service Population

Region	VMT Metrics	Sustainable Communities Strategy Alternatives (2031)	Future With Housing Element Update (2031)	Percent Change from Proposed Project
Countywide Unincorporated Areas	Daily Vehicle Trips	1,079,299	1,118,595	-4%
	Average Trip Length	10.2	9.9	3%
	Total VMT	10,969,889	11,127,670	-1%
	Total VMT per Service Population	37.4	37.9	-1%
South Coast	Daily Vehicle Trips	505,649	537,407	-6%
	Average Trip Length	8.8	8.7	1%
	Total VMT	4,457,832	4,668,827	-5%
	Total VMT per Service Population	29.9	31.3	-4%
Lompoc Valley	Daily Vehicle Trips	124,783	129,078	-3%
	Average Trip Length	12.1	11.9	2%
	Total VMT	1,509,855	1,532,616	-1%
	Total VMT per Service Population	55.6	54.2	3%
Santa Ynez Valley	Daily Vehicle Trips	90,848	94,013	-3%
	Average Trip Length	12.7	12.5	2%
	Total VMT	1,156,176	1,176,377	-2%
	Total VMT per Service Population	51.6	50.8	2%
Santa Maria Valley	Daily Vehicle Trips	344,029	321,697	7%
	Average Trip Length	10.4	9.6	8%
	Total VMT	3,580,444	3,099,601	16%
	Total VMT per Service Population	39.1	36.6	7%
Cuyama Valley	Daily Vehicle Trips	13,990	36,400	-62%
	Average Trip Length	19	17.9	6%
	Total VMT	265,583	650,248	-59%
	Total VMT per Service Population	93.8	82.8	13%

Source: Fehr & Peers 2023; Appendix F

In North County, the total amount of housing growth in the Sustainable Communities Strategy Alternative would be the same as the proposed Project. However, less growth would occur in the Lompoc Valley, Santa Ynez Valley, and Cuyama Valley and more growth would occur in the more VMT-efficient Santa Maria Valley. While the Lompoc Valley, Santa Ynez Valley, and Cuyama Valley would

experience a decrease in total VMT under the Sustainable Communities Strategy Alternative, the total VMT per service population would increase in these HMAs due to lower land use densities and less commercial development than would occur under the proposed Project. Under the proposed Project the commercial development included in the potential rezone sites would provide goods and services for the new housing growth and existing residents in these communities. This would result in shorter travel distances under the proposed Project than in the Sustainable Communities Strategy Alternative. In the Lompoc Valley, the total VMT would decrease by 1 percent and the total VMT per service population would increase by 3 percent. In the Santa Ynez Valley, the total VMT would decrease by 2 percent and the total VMT per service population would increase by 2 percent. In the Cuyama Valley, the total VMT would decrease by 59 percent and the total VMT per service population would increase by 13 percent.

In the Santa Maria Valley, the additional housing growth under this alternative increases the total VMT by 16 percent and the total VMT per service population by 7 percent in comparison to the proposed Project. While the total VMT per service population in the Santa Maria Valley is still less than the county baseline VMT (1 percent lower), the total VMT per service population in the Santa Maria Valley is actually higher than under Future No Project Conditions (39.1 under the Sustainable Communities Strategies Alternative compared to 36.4). The additional housing growth in the Santa Maria Valley in the Sustainable Communities Alternative effectively reduces the jobs-to-housing ratio from 0.88 under the Future No Project Scenario to 0.58 under this alternative, resulting in longer commutes for the potential future residents living in the Santa Maria Valley. The number of vehicles traveling from Santa Maria Valley to the South Coast increases under the Sustainable Communities Strategy Alternative (8 percent of vehicle trips in comparison to 6 percent in the Project), which increases overall VMT due to the distance (approximately 65 miles) between these communities.

As a result, VMT impacts under the Sustainable Communities Strategy Alternative would be less than those described for the proposed Project but would remain *significant and unavoidable.*

Modification of the potential list of rezone sites under the Sustainable Communities Strategy Alternative would not substantially change potential impacts associated with changes in the roadway geometric and traffic safety environment. New development would continue to have the potential to result in temporary construction-related safety hazards, and the generation and concentration of new ADTs on local roadways would continue to potentially exceed the County's design capacities for existing roadways and intersections, particularly in the South Coast. Mitigation required in Section 3.14, *Transportation*, and compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details would address adequate driveway line of sight, turning movements, and other geometric hazards. As such, impacts from construction-related safety hazards and traffic safety and roadway combability would be similar to those described for the proposed Project and would remain *significant but mitigable*.

Utilities and Water Supply

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Overall, the Sustainable Communities Strategy Alternative would result in the same amount of potential development as the proposed Project, but development associated with the potential rezone sites would be concentrated within the South Coast (i.e., Eastern Goleta Valley) and the Santa Maria Valley (i.e., Orcutt). This alternative would continue to require the construction of new utility service connections and increase demand for utility supplies and services throughout the county. Similar to

the proposed Project, increases in demand for services or supplies at a given location may also trigger the need for the construction of new laterals and/or the replacement/expansion of existing infrastructure, which could cause significant physical environmental impacts. Impacts associated with the construction, expansion, or replacement of utilities would be reduced as compared to the proposed Project due to the removal of the 10 potential rezone sites from consideration under the Potential Rezone Program; however, impacts would remain similar to the proposed Project. All mitigation measures identified in Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.8, *Hydrology and Water Quality,* and Section 3.11, *Noise* would be required to reduce construction-related impacts to the maximum extent feasible; however, impacts would remain *significant and unavoidable* due to the scale and location of housing in areas that are currently undeveloped or underutilized.

Concerning water supplies and associated water demand, the elimination of 10 potential rezone sites from consideration would potentially substantially reduce impacts to specific potable water service providers based on water demand, while increasing impacts to others. For instance, the Sustainable Communities Strategy Alternative would eliminate sites within some regions of the county, thereby reducing or eliminating impacts resulting from increased demand for potable water supplies provided by local service districts or providers. Rezone Site Nos. 32 (Fong 1), 33 (Fong 2), and 34 (Alexander 1), for example, are located within the service area of the Mission Hills CSD and Vandenberg Village CSD. Eliminating these sites would reduce potential impacts to water supplies for these districts when compared to the proposed Project. Similarly, by eliminating Rezone Site No. 36 (Blue Sky Property), which receives water supplies from the Cuyama CSD and which would have inadequate water surplus supplies to serve development associated with this rezone site, this alternative would avoid a potential need for substantial improvement of Cuyama CSD's potable water supply and infrastructure. By eliminating these sites, as well as Rezone Site No. 35 (Chumash LLC), the Sustainable Communities Strategy Alternative would reduce impacts on water supplies and reliability of the Mission Hills CSD, Vandenberg Village CSD, Santa Ynez CSD, and New Cuyama CSD.

This alternative would relocate the development capacity of potential rezone sites in Lompoc Valley, Santa Ynez Valley, and Cuyama Valley amongst the potential rezone sites within Orcutt, which would result in an equivalent increase in demand for water supplies from the Golden State Water Company – Orcutt. While this alternative would potentially increase impacts on the water supplies of the Golden State Water Company – Orcutt, this increase in water demand is not anticipated to result in the Golden State Water Company – Orcutt having inadequate water supplies to facilitate the development or necessitate the expansion of services to serve potential development.

In the South Coast, the elimination of Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) would reduce impacts on water supplies for the Carpinteria Valley Water District (CVWD) when compared to the proposed Project. However, redistributing the development amongst sites rezone sites within the Hollister HQTC in Eastern Goleta Valley would increase demand for water supplies of the Goleta Water District by an equivalent amount. As described in Section 3.15, *Utilities and Water Supply,* the increased demand for water supplies generated by the Project has the potential to exceed the available supplies of the Goleta Water District. In addition, Goleta Water District's Agricultural Conversion Restriction Amendment restricts the conversion of water from agricultural parcels to residential, commercial, and other uses. Several of the Potential Rezone Sites identified as part of the Housing Element Update consist of agricultural parcels that could be rezoned to accommodate higher-density residential (Rezone Site Nos. 1 through 9; Section 3.2, *Agricultural Resources*). As a result, relocation of potential development capacity associated with Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) within the service area of the Goleta Water

District would result in potentially greater impacts compared to those described for the proposed Project.

Overall, impacts to water supplies would be less than those described for the proposed Project because potential housing development would be located primarily in water service areas that could accommodate residential growth beyond current land use plan capacities. However, since it is uncertain whether water supplies and regulatory allocations are adequate to accommodate the potential housing development in the South Coast, including conversion of agricultural water allocations to residential allocations in the Eastern Goleta Valley, impacts would remain *significant and unavoidable.*

Concerning wastewater treatment services, the Sustainable Communities Strategy Alternative would result in a reduction in impacts on wastewater services in the Vandenberg Village, Mission Hills, Santa Ynez, New Cuyama communities, and the Carpinteria Valley, but would potentially increase impacts in Orcutt and Eastern Goleta Valley. Specifically, the elimination of Rezone Site Nos. 32 (Fong 1), 33 (Fong 2), and 34 (Alexander 1) would reduce wastewater that would need to be conveyed to and treated at the La Purisima Wastewater Treatment Plant (WWTP) and Lompoc Regional Wastewater Reclamation Plant. Eliminating these sites would reduce potential impacts on wastewater treatment systems or services of these districts as compared to the proposed Project. Similarly, by eliminating Rezone Site No. 36 (Blue Sky Property), which is within the service area of the Cuyama CSD and would have inadequate capacity in the Cuyama CSD WWTP to serve development associated with this rezone site, this alternative would avoid a potential need for substantial improvement of Cuyama CSD's wastewater treatment system and infrastructure.

By eliminating these sites in North County and redistributing the development amongst rezone sites within Orcutt, the Sustainable Communities Strategy Alternative would result in an equivalent increase in demand for wastewater treatment by the Laguna County Sanitation District. Under the proposed Project, wastewater generated in the Laguna County Sanitation District's service area would exceed the limited discharge capacity of the treatment system and nearly exceed the remaining treatment capacity. By increasing potential development within this service area, the Sustainable Communities Strategy Alternative is likely to result in further exceedances of the limited discharge capacity of the system, as well as result in an exceedance of the system's rated treatment capacity. Therefore, the Sustainable Communities Strategy Alternative would reduce impacts on wastewater treatment systems and services of Mission Hills CSD, Vandenberg Village CSD, and New Cuyama CSD, but would result in increased impacts for the Laguna County Sanitation District.

Within the South Coast, the elimination of Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) would reduce impacts on wastewater treatment and services of the Carpinteria Sanitation District when compared to the proposed Project. Elimination of Rezone Site No. 11 (Glen Annie) would reduce impacts on wastewater treatment and services of the Goleta West Sanitary District when compared to the proposed Project. However, redistributing the development amongst sites rezone sites within the HQTC, which is located within the service area of the Goleta Sanitary District, would increase wastewater requiring treatment at the Goleta Sanitary District Regional WWTP. As described in Section 3.15, *Utilities and Water Supply,* the Goleta Sanitary District has inadequate treatment capacity to serve development under the proposed Project, and increasing wastewater generation in the service area under the Sustainable Communities Strategy Alternative would result in greater exceedances and increased impacts associated with expansion or improvement of the system. As a result, the relocation of potential development capacity associated with Rezone Site Nos. 11 (Glen Annie), 15 (Van Wingerden 1), and 16 (Van Wingerden 2) within the

service area of the Goleta Sanitary District service area would result in potentially greater impacts compared to the proposed Project.

Overall, impacts would be less than those described for the proposed Project, but because there is a potential for wastewater treatment capacity to be exceeded in Eastern Goleta Valley and Orcutt, impacts would remain *significant and unavoidable.*

Concerning solid waste, when compared to the proposed Project, the Sustainable Communities Strategy Alternative would result in a generation of a similar amount of solid waste that would be disposed at local and regional waste disposal facilities. Therefore, as described for the proposed Project, this alternative could result in the generation of solid waste that could exceed relevant standards and/or the capacity of existing waste disposal facilities serving the county. Additionally, this alternative could impair the attainment of solid waste reduction goals. Impacts related to solid waste would be similar to those described for the proposed Project and would remain *significant and unavoidable.*

Wildfire

Under the Sustainable Communities Strategy Alternative, the same components of the Housing Element Update would be implemented, but with a modified list of potential rezone sites. Of the 10 potential rezone sites eliminated from consideration under this alternative, Rezone Site Nos. 11 (Glen Annie), 12 (St. Vincent's – East), 13 (St. Vincent's – West), 32 (Fong 1), 33 (Fong 2), 34 (Alexander 1), 35 (Chumash LLC), and 36 (Blue Sky Property) are all mapped within or partially within High/Very High FHSZ. In addition, these sites include 51.0 acres mapped within the Influence Zone and 36.7 acres mapped within the Interface Zone of the WUI. Eliminating this site would result in an approximate 3.8 percent and 11.7 percent reduction in the total acreage of sites within the WUI Influence Zone and Interface Zone, respectively, when compared to the proposed Project. The Sustainable Communities Strategy Alternative would reduce the number of sites and potential development within areas subject to wildfire hazards, and wildfire hazard impacts would be substantially less than those described for the proposed Project. However, since the sites inventory indicates that several sites would continue to be located within the FHSZs and WUI, wildfire impacts would remain *significant and unavoidable*. Impacts related to adopted emergency response plans or emergency evacuation plans would be similar to those described for the proposed Project and would remain *insignificant*. Additionally, the Sustainable Communities Strategy Alternative would not substantially expose people or structures to significant post-wildfire risks. Impacts would be similar to those described for the proposed Project and would remain *insignificant*.

Conclusion and Relationship to Project Objectives

The Sustainable Communities Strategy Alternative would concentrate potential higher-density and affordable housing development in a designated HQTC on the South Coast and near existing services, including transit and active transportation facilities in the North County. This would target housing opportunities, especially higher-density, multifamily, affordable housing, in existing urban communities in the South Coast and Santa Maria Valley, which are the most VMT-efficient regions in the county. In contrast to the proposed Project, the Sustainable Communities Strategy Alternative would consolidate housing away from regions that are not VMT-efficient, do not provide as many jobs or services, and exhibit greater constraints to development (e.g., natural resources, utilities, infrastructure, wildfire hazards). Increased densities within the South Coast and the Santa Maria Valley would further support the production of affordable housing near jobs and transit. However,

while this alternative would focus new housing in urban infill areas that are in proximity to services, it would not substantially reduce total VMT or total VMT per service population in the North County.

Table 4-4. Sustainable Communities Strategy Alternative – Comparison to Project Objectives

Project Objective	Ability for Alternative to Achieve Objective
1. Rezone sites to accommodate the County's state-mandated 6th Cycle RHNA (5,644 units) plus a 15 percent buffer for the lower- and moderate-income categories (576 units), which total 6,240 units.	This alternative would enable the same amount of potential development as the proposed Project and would accommodate the County's state-mandated 6th Cycle RHNA plus a 15 percent buffer for the lower- and moderate-income categories.
2. Promote housing development on infill sites and maximize housing capacity by rezoning at higher densities to facilitate multifamily housing to accommodate housing for lower- and moderate-income households.	By removing rezone sites located in less urbanized areas of the county, focusing potential development on urban infill sites, and increasing the potential density of rezone sites within the Eastern Goleta Valley and Orcutt, this alternative would achieve this objective, potentially to a greater degree than the proposed Project.
3. Promote a jobs-to-housing balance countywide by facilitating the development of sufficient and affordable housing in close proximity to job centers and essential community services.	This alternative would achieve this objective for the South Coast; however, the additional housing growth in the Santa Maria Valley in the Sustainable Communities Alternative effectively reduces the jobs-to-housing ratio under this alternative resulting in longer commutes for the additional residents living in the Santa Maria Valley. The number of vehicles traveling from Santa Maria Valley to the South Coast increases under the Sustainable Communities Strategy Alternative (8 percent of vehicle trips in comparison to 6 percent in the Project), which increases overall VMT due to the distance (approximately 65 miles) between these communities.
4. Encourage diverse housing types that meet the requirements of special needs households.	This alternative would enable the same amount of potential development as the proposed Project and would encourage diverse housing types that meet the requirements of special needs households.
5. Promote equal housing opportunities and locational choices for all persons in all housing types.	The elimination of potential rezone sites from consideration in Lompoc Valley, Santa Ynez Valley, and Cuyama Valley and the consolidation of high-density multifamily housing in the South Coast and the Santa Maria Valley would potentially reduce the diversity and locational choices of housing. For example, this alternative would eliminate potential rezone sites located within the Carpinteria Valley, thereby substantially reducing potential housing in area of need. Pending projects and existing vacant sites would continue to provide some housing options in Lompoc Valley, Santa Ynez Valley, and Cuyama Valley. While this alternative would continue achieve this objective, it would do so to a lesser degree than the proposed Project.

Table 4-4. Sustainable Communities Strategy Alternative – Comparison to Project Objectives (Continued)

Project Objective	Ability for Alternative to Achieve Objective
6. Promote and support fair housing choice and fair housing public outreach programs.	This alternative would enable the same amount of potential development as the proposed Project and would continue to promote and support fair housing choice and fair housing public outreach programs.
7. Collaborate with developers to improve and conserve affordable housing units and provide gap financing for affordable units.	This alternative would enable the same amount of potential development as the proposed Project and would continue to promote collaboration with developers to improve and conserve affordable housing units and provide gap financing for affordable units.
8. Reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.	This alternative would enable the same amount of potential development as the proposed Project and would continue to reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.
9. Prioritize housing for people who live and/or work within Santa Barbara County.	This alternative would enable the same amount of potential development as the proposed Project and would continue to prioritize housing for people who live and/or work within Santa Barbara County.
10. Ensure new housing sites have adequate infrastructure and do not face significant environmental constraints.	This alternative would alleviate new demands on several constrained utilities and service providers in the Lompoc Valley, Santa Ynez Valley, and Cuyama Valley. By concentrating potential development within the South Coast (i.e., Eastern Goleta Valley) and the Santa Maria Valley (i.e., Orcutt), and the service areas of the respective utility service providers, the Sustainable Communities Strategy Alternative has the potential to experience environmental constraints and limits to water and wastewater utilities (see *Utilities and Water Supply* discussion above), and thereby potentially not achieving this objective similar to the proposed Project.

4.5.3 Alternative 3 — Reduced Project A

The Reduced Project A Alternative would implement all of the same components of the proposed Project, including the Housing Element Update goals, policies, and programs. However, the Reduced Project A Alternative would involve a modified sites inventory that includes fewer sites for consideration for rezoning under the Potential Rezone Program. Specifically, under the Reduced Project A Alternative, the following sites would not be considered for rezoning:

- South Coast Rezone Sites Eliminated from Potential Rezone Program
  - Site No. 2 (St. Athanasius Church)
  - Site No. 3 (Scott)
  - Site No. 4 (Ekwill)
  - Site No. 5 (Caird 1)
  - Site No. 6 (Caird 2)
  - Site No. 7 (Caird 3)
- North County Sites Eliminated from Potential Rezone Program
  - Site No. 24 (Key Site 26)
  - Site No. 26 (North Point HOA)
  - Site No. 27 (Boys and Girls Club)

Under the Reduced Project A Alternative, these sites would not be included as potential rezone sites and would thus be limited to land uses and development allowed under the County's existing zoning ordinances. As summarized in Table 4-5, eliminating these sites from consideration in the sites inventory would reduce potential new development compared to the proposed Project. Maximum potential housing development under the Reduced Project A Alternative would include approximately 13,704 units in the South Coast, and 12,755 units in the North County, for a total of 26,459 units countywide, approximately 23.5 percent less than the proposed Project. An estimated 1,456 units (5.5 percent) would be SFDs and an estimated 25,003 units (94.5 percent) would be MFDs (Table 4-6). By eliminating nine potential rezone sites and thereby only allowing the development of these sites under the existing zoning standards, the implementation of the Reduced Project A Alternative would result in the potential development of up to 1,311,307.4 square feet of commercial development (Table 4-7).

Table 4-5. Reduced Project A Alternative Maximum Housing Buildout Summary

	South Coast	North County			
		Lompoc Valley	Santa Maria Valley	Santa Ynez Valley	Cuyama Valley
Total Units					
Existing Vacant Sites	528	143	2,929	544	--
Rezones	11,764	428	6,150	305	1,812
County-owned Sites	320	--	--	--	--
Pending Projects	1,092	350	--	61	33
Total by HMA	13,704	921	9,079	910	1,845
Total by RHNA Region	13,704	12,755			
Total Unincorporated County	26,459				

Table 4-6. Reduced Project A Alternative Maximum Buildout Single-Family and Multifamily Dwellings

	SFDs (% Total Buildout)		MFDs (% Total Buildout)		Total (% Total Buildout)	
South Coast	379	1.4%	13,325	50.4%	13,704	51.8%
North County	1,077	4.1%	11,678	44.1%	12,755	48.2%
Lompoc Valley	*126*	*0.5%*	*795*	*3.0%*	*921*	*3.5%*
Santa Maria Valley	*781*	*3.0%*	*8,298*	*31.3%*	*9,079*	*34.3%*
Santa Ynez Valley	*170*	*0.6%*	*740*	*2.8%*	*910*	*3.4%*
Cuyama Valley	*--*	*0.0%*	*1,845*	*7.0%*	*1,845*	*7.0%*
Total Unincorporated County	1,456	5.5%	25,003	94.5%	26,459	100.0%

Table 4-7. Reduced Project A Alternative Commercial Buildout Summary

	South Coast	North County			
		Lompoc Valley	Santa Maria Valley	Santa Ynez Valley	Cuyama Valley
Commercial Square Feet					
Existing Vacant Sites	14,374.8	3,484.8	355,885.2	79,497.0	--
Rezones	--	35,501.4	566,254.2	--	206,910.0
County-owned Sites	--	--	--	--	--
Pending Projects	--	48,290.0	--	--	1,110.0
Total by HMA	14,374.8	87,276.2	922,139.4	79,497.0	208,020.0
Total by RHNA Region	14,374.8	1,296,932.6			
Total Unincorporated County	*1,311,307.4*				

Aesthetics and Visual Resources

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezones. Eliminating these rezone sites from the Potential Rezone Program under this alternative would reduce overall development within the existing Urban Area of the South Coast and Santa Maria Valley. However, as described for the proposed Project, higher-density development within the Urban Area would not result in substantial changes to the visual character of existing scenic vistas, visual resources, or State Scenic Highways. Rezone Site Nos. 2 through 7 in the South Patterson Agricultural Area and Rezone Site Nos. 24 (Key Site 26), 26 (North Point HOA), and 27 (Boys and Girls Club) in Orcutt are not visible from public scenic vistas or State Scenic Highways. However, impacts described for the proposed Project, including the potential development of Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11), which would potentially be visible from Clark Avenue, a locally designated public view corridor and visual resource in Orcutt, would remain under this alternative. Development of higher-density housing projects on sites that are visible from public vistas and State Scenic Highways that would substantially change and/or obstruct existing public views and degrade the visual resource value of those views would remain in the sites inventory under this alternative. Impacts would remain similar to those described for the proposed Project in Section 3.1, *Aesthetics and Visual Resources,* and would remain *significant and unavoidable.*

As described for the proposed Project, this alternative could result in potential impacts on visual character or quality of public views or otherwise generate impacts related to inconsistency with County policy for visual and aesthetic resources or otherwise. This is particularly true for higher-density housing and mixed use development of 20 to 40 du/ac and up to four stories or more on large properties that are currently undeveloped and contain visual resources. These project sites include natural habitat areas, vegetation, waterways, or sites that are otherwise located in the Rural Area, provide views of hillsides, and/or support existing agriculture against high-value visual settings. The removal of sites considered for rezoning within the South Patterson Agricultural Area would reduce this potential impact as it relates to agricultural sites in the Urban Area. However, impacts in the Rural Area, including potential impacts associated with Rezone Site No. 11 (Glen Annie) on the South Coast and Rezone Site No. 23 (Key Site 16) in Santa Maria Valley would remain. Rezone Site No. 11 (Glen Annie) would transform a golf course surrounded by natural areas and agricultural uses into a

residential neighborhood with up to 40 du/ac and four stories or more, which would be highly visible from public vistas in the foothills and local public roads. Rezone Site No. 23 (Key Site 16) is located on the fringe of the Urban Area but would substantially change the existing open land and rural character of western Orcutt if rezoned and developed. Therefore, impacts would be substantially less adverse than those described for the proposed Project but would remain *significant and unavoidable,* even after the implementation of the required mitigation described in Section 3.1, *Aesthetics and Visual Resources.*

Similar to the proposed Project, implementation of this alternative would not result in any potential inconsistencies with light and glare, and associated impacts would remain *insignificant.*

Agricultural Resources

Under the Reduced Project A Alternative, six sites that support agricultural resources would not be considered for rezones. By eliminating Rezone Site No. 2 through No. 7, which consist of agricultural-zoned and actively cultivated parcels within the South Patterson Agriculture Area, implementation of the Reduced Project A Alternative would substantially reduce impacts associated with the potential conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance as well as existing agriculturally zoned lands to non-agricultural uses. In total, the Reduced Project A Alternative would avoid the potential conversion of up to 61.8 acres of Farmland of Statewide Importance, 21.4 acres of Prime Farmland, and 48.2 acres of Unique Farmland, resulting in an approximate 51 percent reduction in the amount of FMMP land potential converted to residential uses under the proposed Project in the South Coast. Further, by eliminating Rezone Site No. 6 (Caird 3) from consideration under the Potential Rezone Program, this alternative would avoid impacts associated with the potential for isolation and loss in viability of 20 acres of AG-I-10 lands that would otherwise be rezoned under the proposed Project. However, the Reduced Project A Alternative would continue to result in the potential conversation of FMMP land (e.g., Rezone Site No. 1 [Giorgi] and potential rezone sites located within the San Marcos Agricultural Area, along with conversion of agriculturally zoned lands within the Rural Area (e.g., Rezone Site Nos. 11 [Glen Annie], 15 [Van Wingerden 1], 16 [Van Wingerden 2]). Therefore, impacts would be substantially less adverse than those described for the proposed Project in Section 3.2, *Agricultural Resources*, but would remain *significant and unavoidable.*

Air Quality

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. The proposed Project would facilitate residential and mixed use development projects that would result in the generation of criteria air pollutant emissions through the use of heavy construction equipment and mobile source vehicle emissions. As described above, implementation of this alternative would result in a potential 23.5 percent reduction in overall residential development and an approximate 15.4 percent reduction in overall commercial development when compared to the proposed Project which would reduce overall cumulative construction and operational emissions by a roughly comparable amount. However, impacts associated with individual development projects would remain similar to those described for the proposed Project and could still result in a cumulatively considerable net increase of a criteria pollutant that is in nonattainment in Santa Barbara County. Housing projects involving earth-moving activities would have the potential to exceed the SBCAPCD's adopted rules and standards, the potential for compounding of construction-related emissions associated with overlapping construction schedules of numerous housing projects, and the potential for exposure of sensitive receptors to substantial pollutant concentrations. Even with the implementation of

mitigation measures described in Section 3.1, *Air Quality*, construction-related impacts on air quality would be similar to those described for the proposed Project and would remain *significant and unavoidable.*

Operationally, given the overall scale of potential development, the elimination of the nine potential rezone sites and the reduction in overall development under this alternative would not substantially reduce operational air emissions such that SBCAPCD's thresholds would not be exceeded. Impacts would be less adverse than those described for the proposed Project, but impacts would remain *significant and unavoidable,* even after the implementation of required mitigation measures described in Section 3.3, *Air Quality*.

Similar to the proposed Project, implementation of this alternative would not result in any potential inconsistencies with applicable air quality plans or policies, nor would this alternative generate objectionable odors, and associated impacts would remain *insignificant.*

Biological Resources

Under the Reduced Project A Alternative, impacts on biological resources from potential housing development would be reduced, but residential and mixed use development could continue to impact sensitive habitats and special-status species. Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. The elimination of potential rezone sites under this alternative could reduce impacts to sensitive habitats and special-status species. For example, Rezone Site No. 6 (Caird 2) includes riparian woodlands and designated ESH associated with Maria Ygnacio Creek and Atascadero Creek. These creeks also serve as important wildlife corridors, providing a connection between the undeveloped foothill lands and the Goleta Slough. Federally designated critical habitat for the endangered tidewater goby (*Eucyclogobius newberryi*) is also mapped within Atascadero Creek immediately downstream of Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3). Nevertheless, the Reduced Project A Alternative would continue to facilitate residential and mixed use development within other sites throughout the county that support sensitive biological resources. Therefore, even with the implementation of mitigation measures described in Section 3.4, *Biological Resources*, impacts on sensitive biological resources and potential conflicts with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources would be similar to those described for the proposed Project and would remain *significant and unavoidable.*

Cultural Resources and Tribal Cultural Resources

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. Nevertheless, the implementation of the Reduced Project A Alternative and elimination of the nine potential rezone sites would not avoid or substantially reduce impacts on cultural resources, including prehistoric and historic, archaeological resources, historic resources, and tribal cultural resources. For example, rezone sites within the South Patterson Agricultural Area (Rezone Site No. 2 through No. 7) consist of agriculturally zoned lands that are already disturbed as a result of active agricultural operations. Therefore, the potential for previously unknown historic resources or buried archaeological resources to occur at these sites is low. Nevertheless, remaining sites – particularly in areas located near creek beds, bluffs, and estuaries, which have a greater likelihood of supporting early habitation and use by Native Americans – could still contain known or unknown historic resources and/or buried archaeological resources that could be encountered, disturbed, or destroyed as part of the

construction of future residential and mixed use development. For example, Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in Orcutt are located along Orcutt Creek and may be in proximity to potentially archaeologically sensitive areas. As described for the proposed Project, any future development under the Reduced Project A Alternative would be required to comply with applicable federal, state, and local policies and regulations that concern the preservation of historical resources and its regulations governing demolition. With the implementation of mitigation measures described in Section 3.5, *Cultural and Tribal Cultural Resources*, impacts to cultural resources and tribal cultural resources would be similar to those described for the proposed Project and would remain *significant but mitigable*.

Energy

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. As described above, implementation of this alternative would result in a potential 23.5 percent reduction in overall residential development and an approximate 15.4 percent reduction in overall commercial development when compared to the proposed Project, which would likely reduce overall energy demands by roughly a comparable amount. As described for the proposed Project in Section 3.6, *Energy,* future development under this alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with applicable plans, policies, or regulations regarding energy conservation. Impacts on energy under this alternative would be less adverse than those described for the proposed Project and would remain *insignificant.*

Greenhouse Gas Emissions

Under Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. As described for the proposed Project, the implementation of this alternative would facilitate residential and mixed use development that would result in the generation of GHGs during construction and operation. However, as described for *Air Quality* and *Energy*, implementation of this alternative would result in a potential 23.5 percent reduction in overall residential development and an approximate 15.4 percent reduction in overall commercial development when compared to the proposed Project, which would reduce overall cumulative construction and operational GHG emissions by a roughly comparable amount. As described for the proposed Project in Section 3.7, *Greenhouse Gas Emissions,* future development under this alternative would not generate GHG emissions exceeding locally adopted thresholds or conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts associated with GHG emissions would be less adverse than those described for the proposed Project and would remain *insignificant.*

Hazards and Hazardous Materials

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. None of the nine potential rezone sites eliminated under this alternative include known hazardous sites. However, the South Patterson Agricultural Area (including Rezone Site No. 2 through No. 7) consists of commercial agricultural properties that may contain unknown hazards commonly found in other agricultural areas of the county (e.g., pesticides/herbicides) and therefore have the potential to involve disturbance of existing soil contamination. The elimination of these sites would reduce the potential impacts related to the disturbance of contaminated soils or groundwater. Nevertheless, as described for the proposed

Project, residential and mixed use development under this alternative could still feasibly occur on properties that have experienced prior releases of hazardous materials or wastes. For example, Rezone Site No. 17 (Montessori) overlaps with an open cleanup program site in Eastern Goleta Valley within the South Coast. Disturbance of contaminated surface soils or groundwater or the release of hazardous building materials could subject workers, neighboring land uses, and future residents to hazardous substances. With the implementation of mitigation measures described in Section 3.8, *Hazards and Hazardous Materials*, impacts would remain ~~*potentially*~~ *significant but mitigable*.

The elimination of Rezone Site No. 2 through No. 7 from consideration as part of the Potential Rezone Program under this alternative would eliminate sites located within or partially within Safety Zones 2 and/or 4 of the Santa Barbara Municipal Airport. Additionally, the elimination of Rezone Site Nos. 24 (Key Site 26), 26 (North Point HOA), and 27 (Boys and Girls Club) would eliminate sites located within or partially within Safety Zones 2 and/or 4 of the Santa Maria Airport. By avoiding rezoning and development of these sites, impacts associated with airport-related hazards would be substantially less adverse than those described for the proposed Project. The Reduced Project A Alternative continues to include sites as part of the Potential Rezone Program that are located within airport safety zones (e.g., Rezone Site No. 1 [Giorgi] within Safety Zone 2 of the Santa Barbara Municipal Airport and various potential rezone sites located with Safety Zone 2 of the Santa Maria Airport). Nevertheless, with the implementation of mitigation measures described in Section 3.8, *Hazards and Hazardous Materials*, impacts would remain *significant but mitigable*.

Hydrology and Water Quality Resources

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. Elimination of Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3) from consideration as part of the Potential Rezone Program under this alternative eliminates sites located along Atascadero Creek and Maria Ygnacio Creek. By avoiding rezoning and development of these sites, the Reduced Project A Alternative would reduce impacts on water quality associated with extensive soil disturbance from construction activities. The elimination of Rezone Site Nos. 2 (St. Athanasius Church), 4 (Ekwill), 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3) from consideration as part of the Potential Rezone Program would reduce the potential for groundwater contamination. As described for the proposed Project, the County reviews all related development permits to ensure compliance with the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance (Ord. No. 4766, 11-9-2010), Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), and the County's SWMP, if applicable. Mandatory compliance with these measures would ensure development enabled under this alternative would not degrade surface or groundwater resources or violate any water quality standards. Impacts on water quality would be less adverse than those described for the proposed Project in Section 3.9, *Hydrology and Water Quality,* and would remain *insignificant.*

Concerning groundwater supplies and management, the elimination of these rezone sites in Eastern Goleta Valley and Orcutt from consideration as part of the Potential Rezone Program would reduce impacts resulting from increased demand for potable water supplies provided by local groundwater basins, particularly the Goleta Groundwater Basin and Santa Maria Valley Groundwater Basin. Nevertheless, residential and mixed use development associated with the Reduced Project A Alternative would continue to increase demand for and pumping of groundwater in all groundwater basins, including in the Goleta and Santa Maria Valley groundwater basins, as well as the Carpinteria, Montecito, Santa Barbara, Foothill, Cuyama Valley, and Santa Maria Valley groundwater basins.

Impacts related to groundwater supply would be less adverse than those described for the proposed Project but would remain *significant and unavoidable* due to the potential impacts to the Cuyama Valley and Santa Ynez River Valley groundwater basins, which are high- and medium-priority basins, respectively.

As described for the proposed Project, implementation of this alternative would increase the area of impervious surfaces and could potentially impact groundwater recharge. However, new development causing 1 acre or greater of ground disturbance or creating a certain amount of new or replaced impervious surfaces within the NPDES permit area would be required to comply with the NPDES MS4 Permit; State Water Board Construction General Permit, as applicable; and the Flood Control District's Standard Conditions of Project Plan Approval (Standard Conditions), which stipulate certain requirements for onsite surface retention and underground stormwater chambers depending on the size of the project to reduce post-development peak stormwater runoff and encourage groundwater recharge. Additionally, the County's compliance with state and local regulations governing water quality would ensure that development projects use BMPs that would limit impacts where future projects have the potential to impact groundwater recharge. Further, future development is not expected to interfere with potential recharge projects due to the expansive nature of recharge aquifers and the relatively small scale of potential housing sites. Impacts would remain similar to those described for the proposed Project and would be *insignificant*.

The elimination of Rezone Site Nos. 2 (St. Athanasius Church), 4 (Ekwill), 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3) from consideration as part of the Potential Rezone Program would decrease the potential for residential and mixed use development within a FEMA Special Flood Hazard Area. Nevertheless, the implementation of flood hazard development standards would continue to be required to ensure that this impact would remain *significant but mitigable*. Impacts related to flooding within coastal areas susceptible to tsunami and areas downstream of reservoirs and lakes that could be susceptible to flooding due to seiche would remain similar to those described for the proposed Project and would be *insignificant*.

As described for the proposed Project, new residential and mixed use development under this alternative would potentially conflict with the GSPs for the Cuyama Valley, San Antonio Creek Valley, and Santa Ynez River Valley groundwater basins and obstruct the management actions and sustainability strategies for these basins. Impacts under this alternative would be similar to those described for the proposed Project and would remain *significant and unavoidable.*

Land Use and Planning

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. As described in Section 3.10, *Land Use and Planning,* the proposed Project and sites inventory would not result in the division of an established community. The modified list of potential rezone sites involving the elimination of nine potential rezone sites within the South Coast and Santa Maria Valley would similarly not divide an established community, and impacts would remain *insignificant.*

Reduced Project A Alternative could result in physical effects that could potentially conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. This alternative would eliminate nine sites from consideration as part of the Potential Rezone Program, including six sites in the South Patterson Agriculture Area. The elimination of these sites would strengthen consistency with the County's agricultural resources policies (e.g.,

Policy LUR-EGV-3.1 and LUA-EGV-1.5) as well as the ALUCPs for the Santa Barbara Airport and Santa Maria Airport. However, as described above in *Agriculture*, this alternative would continue to result in some potential rezones of agricultural land (e.g., San Marcos Agricultural Area and Giorgi). As described above in *Hazards and Hazardous Materials*, this alternative would also continue to include some potential rezones of parcels in Safety Zone 2 and Safety Zone 4. Additionally, as described for the proposed Project this alternative could result in potential inconsistencies related to the Connected 2050 RTP/SCS, CLUP, CZO, County Comprehensive Plan policies, and other local plans and policies. The elimination of potential rezone sites within the Hollister Avenue HQTC and Orcutt would make this alternative less consistent with SB 375, SBCAG's Connected 2050 RTP/SCS, and the County's ATP, which all prioritize housing in VMT-efficient regions of the county. Overall, impacts related to land use and planning under the Reduced Project A Alternative would be similar to those described for the proposed Project in Section 3.10, *Land Use and Planning*, and would be *significant and unavoidable*.

Noise

Construction activities associated with future residential development under the Reduced Project A Alternative would result in a temporary increase in noise levels in the vicinity of individual project sites or clusters of such sites. The elimination of Rezone Site No. 2 through No. 7 would reduce construction noise in the Eastern Goleta Valley, but construction noise levels over 65 dBA L_{eq} would remain due to potential peak construction equipment noise at future residential and mixed use sites. For example, in Eastern Goleta Valley, construction activities in the San Marcos Agricultural Area (Rezone Site Nos. 8, 9, 10, and 17) could generate noise that would adversely affect the adjacent residential neighborhoods to the west and south. Nevertheless, the impacts would be similar to those described for the proposed Project. Even with the implementation of mitigation measures described in Section 3.11, *Noise*, necessary to control construction noise generated from specific equipment and phases of development and to limit the duration and timing of construction, noise impacts from temporary construction would remain *significant but mitigable*.

With regard to operational noise, the implementation of the Reduced Project A Alternative would reduce noise along arterial roadways in the Eastern Goleta Valley as compared to the proposed Project. For example, noise levels along Hollister Avenue would be expected to decrease. However, increases in noise levels along San Marcos Road and SR 135 would remain *potentially significant*. Nevertheless, as described for the proposed Project, while this alternative would facilitate the development of residential uses within existing noise environments along high-volume highways and roadways, the implementation of site-based noise studies and attenuation features and site-based VMT measures described in Section 3.11, *Noise* and Section 3.14, *Transportation* would ensure that this impact would remain *significant but mitigable*, similar to the proposed Project.

With the elimination of potential rezone sites in the South Patterson Agricultural Area (Rezone Site No. 2 through No. 7), there would be a substantial reduction in the number of potential housing projects within the 60-65 dBA noise contour of the Santa Barbra Airport. Rezone Site No. 1 (Giorgi) would remain partially within the 60-65 dBA noise contour of the Santa Barbara Airport and potential housing projects in the Santa Maria Valley would still be located within the 60-65 dBA noise contour of the Santa Maria Airport. Nevertheless, as described for the proposed Project, impacts would remain *significant but mitigable* with the implementation of **MM NOI-2 (Noise Study and Site-based Attenuation)**.

Similar to the proposed Project, the construction of housing projects could generate groundborne vibration depending on the construction procedure and equipment used, but vibration levels would

not adversely affect sensitive receptors because potential housing projects would not lie within 25 feet of existing offsite structures that would be vulnerable to temporary vibration. Operational noise from stationary sources would not substantially affect sensitive receptors since, similar to the proposed Project, this alternative would result in residential and mixed use projects that do not generate high noise or vibration levels. Therefore, impacts related to groundborne vibration as well as stationary operational noise sources would remain *insignificant* similar to the proposed Project.

Population and Housing

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. By eliminating nine potential rezone sites, this alternative would result in a maximum potential buildout of up to 26,459 new residential units, a reduction of approximately 23.5 percent compared to the proposed Project. Consequently, this alternative would have an equivalent reduction in future population growth, resulting in an increase in the population in unincorporated Santa Barbara County by an estimated 76,466 persons. Despite the reduction in population and housing growth as compared to the proposed Project, the Reduced Project A Alternative would continue to result in growth that would exceed projections anticipated in the Connected 2050 RTP/SCS and the regional growth forecasts prepared by SBCAG and the County. Therefore, impacts on population and housing growth under this alternative would be less adverse than those described for the proposed Project in Section 3.12, *Population and Housing,* but impacts would remain *significant and unavoidable*.

Concerning the potential for displacement of a substantial number of people and housing, the nine potential rezone sites excluded from consideration under this alternative are all currently vacant sites that do not support existing residential development. Implementation of the Reduced Project A Alternative would continue to include consideration of potential rezone sites that support existing residential uses (e.g., Rezone Site No. 25 [Mariposa Real] and No. 29 [Hummel Cottages]). However, similar to the proposed Project, the overarching goal of the Housing Element Update as a whole is to encourage and promote the development of housing across all levels of affordability to meet future housing needs in the county. The Reduced Project A Alternative would continue to result in a significant net increase in housing units across all affordability levels and includes programs that aim, in various ways, to protect and expand the housing stock in the county. Therefore, impacts associated with potential displacement of housing would remain similar to those described for the proposed Project and would be *insignificant.*

Public Services and Recreation

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented but with fewer sites considered for rezoning. Similar to the proposed Project, new residential development could foreseeably increase the demand for public services; however, impacts would be reduced as compared to the proposed Project due to the elimination of nine potential rezone sites from consideration under the Potential Rezone Program.

With regard to fire protection services, this alternative would not involve rezoning of Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3) in the South Patterson Agricultural Area, which is located 0.5 and 3.5 miles from Fire Station Nos. 11, 12, and 14 in difficult-to-access areas. However, other difficult-to-access sites such as Rezone Site No. 12 (St. Vincent's – East) and No. 13 (St. Vincent's – West) at the base of the San Marcos Foothills would remain under this alternative. Therefore, while impacts would be less adverse than those described for the proposed Project, this alternative would continue to

result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. Even with payment of development impact fees to fund improvements to mitigate impacts associated with inadequate fire protection services and response times, it is unlikely that necessary improvements could be feasibly implemented to adequately mitigate impacts associated with increased demand for service and fire protection response times. Impacts would remain *significant and unavoidable*.

Implementation of the Reduced Project A Alternative would result in a reduction in total buildout and an increase in the ratio of officers-to-population as compared to the proposed Project. As described for the proposed Project, service ratios would be adequate to serve potential new development and would not warrant the construction or expansion of facilities. Impacts would therefore be less adverse than those described for the proposed Project and would remain *insignificant.*

Implementation of the Reduced Project A Alternative would also result in a reduction in potential impacts related to the construction of new school facilities. A reduction in the total potential buildout under this alternative would reduce the increase in population of school-aged children by approximately 23.5 percent when compared to the proposed Project. Given the location of Rezone Site No. 2 through No. 7, this reduction in school-aged children would be most pronounced in the South Coast. As described in Section 3.13, *Public Services and Recreation,* the school districts within the South Coast, Santa Ynez Valley, and Lompoc Valley could accommodate the anticipated increases in student enrollment. While capacity within the Santa Maria Valley and Cuyama Valley is not expected to accommodate increases in student enrollment under Reduced Project A Alternative, impacts on schools would be reduced through existing regulations with mandatory mitigation fees. SB 50 outlines development fees that are required to be paid by future development before the issuance of building permits. These fees would be used to offset the impact of the additional students through funding modernization, construction, and/or expansion of school facilities. Under Government Code Section 65995.5, payment of developer fees constitutes full mitigation of impacts to schools. Any proposals for construction or expansion of new or existing schools would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible. Impacts would therefore be less adverse than those described for the proposed Project and would remain *insignificant.*

Similarly, although library use and demand for resources would be expected to increase under the Reduced Project A Alternative, it is not anticipated that the construction of new library facilities would be required. Impacts would be less adverse as compared to those described for the proposed Project and would remain *insignificant.*

As described for the proposed Project, but to a lesser degree, the Reduced Project A Alternative would increase population and create a corresponding increase in the demand for recreational facilities across each of the five HMAs. Depending on the levels of use for certain facilities, this alternative could also accelerate the deterioration of public parks and recreation due to intensified overuse. Based on the projected increase in population of 76,466 persons and total public parkland, the Reduced Project A Alternative would result in a ratio of approximately 3.4 acres of parkland for every 1,000 persons (up from 3.1 acres per 1,000 people under the proposed Project). Compared to the County's standard ratio of 4.7 acres of public parkland for every 1,000 residents, this alternative would result in a shortfall of 1.3 acres of parkland for every 1,000 persons. The Reduced Project A Alternative would result in a smaller shortfall and the smaller amount of population growth would reduce the constraints and degradation of existing public parkland and facilities, thereby reducing impacts compared to the proposed Project, particularly within the Eastern Goleta Valley and to a lesser extent

Orcutt. Nevertheless, while less adverse than those impacts described for the proposed Project, buildout under this alternative would continue to result in potentially significant impacts on recreational facilities. Even with the implementation of the **MM LU-1 (Amendments to Design Residential [DR] Zoning)** described in Section 3.10, *Land Use and Planning*, these impacts would be *significant and unavoidable*, as described for the proposed Project. Construction or expansion of recreational facilities may have an adverse impact on the environment. However, any proposals for construction or expansion of new or existing recreational facilities would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible.

Transportation

This alternative would eliminate sites from consideration as part of the Potential Rezone Program, including six sites within the South Patterson Agriculture Area. Sites within the South Patterson Agriculture Area are located in proximity to concentrated public transportation options within the county. Therefore, the elimination of these sites under this alternative would be less consistent with the transportation vision, goals, policies, and programs established in the Connected 2050 RTP/SCS, Comprehensive Plan Circulation Element, and/or County Code. Impacts under the Reduced Project A Alternative would be more adverse as compared to those described for the proposed Project and would remain *significant and unavoidable*.

Elimination of housing sites in the South Coast would not reduce countywide VMT impacts to insignificant levels. Additionally, this alternative would continue to facilitate residential and mixed use development within the Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley, where VMT impacts would be *significant and unavoidable*, as described for the proposed Project. Table 4-8 presents the VMT results for the Reduced Project A Alternative in comparison to the Future with Housing Element Update (2031) scenario. While the total VMT is 5 percent lower than the proposed Project, lower land use densities and the location of housing growth under this alternative would result in a countywide total VMT per service population that is 2 percent higher than the proposed Project. In particular, this alternative would eliminate potential rezone sites within the more VMT efficient areas of the South Coast. As a result, the South Coast would experience a 2 percent decrease in total VMT and a 5 percent increase in total VMT per service population. The Lompoc Valley and Santa Ynez Valley would experience a 1 percent decrease in both total VMT and total VMT per service population, and the Cuyama Valley would experience a 1 percent increase in both total VMT and total VMT per service population. The Santa Maria Valley would have the largest reduction in total VMT of 14 percent and a reduction in total VMT per service population of 3 percent in comparison to the proposed Project.

Overall, transportation impacts under the Reduced Project A Alternative would remain similar to those described for the proposed Project and would be *significant and unavoidable*.

Table 4-8. Reduced Project A Alternative Vehicle Miles Traveled per Service Population

Region	VMT Metrics	Reduced Project A Alternative (2031)	Future With Housing Element Update (2031)	Percent Change from Proposed Project
Countywide Unincorporated Areas	Daily Vehicle Trips	1,073,211	1,118,595	-4%
	Average Trip Length	9.9	9.9	3%
	Total VMT	10,576,479	11,127,670	-4%
	Total VMT per Service Population	38.7	37.9	0%
South Coast	Daily Vehicle Trips	527,327	537,407	-5%
	Average Trip Length	8.7	8.7	2%
	Total VMT	4,578,080	4,668,827	-2%
	Total VMT per Service Population	32.9	31.3	0%
Lompoc Valley	Daily Vehicle Trips	128,547	129,078	-2%
	Average Trip Length	11.9	11.9	5%
	Total VMT	1,524,063	1,532,616	0%
	Total VMT per Service Population	53.9	54.2	0%
Santa Ynez Valley	Daily Vehicle Trips	93,294	94,013	-1%
	Average Trip Length	12.5	12.5	-1%
	Total VMT	1,164,588	1,176,377	-1%
	Total VMT per Service Population	50.3	50.8	0%
Santa Maria Valley	Daily Vehicle Trips	287,601	321,697	-1%
	Average Trip Length	9.2	9.6	-1%
	Total VMT	2,653,209	3,099,601	-11%
	Total VMT per Service Population	35.5	36.6	-4%
Cuyama Valley	Daily Vehicle Trips	36,441	36,400	-14%
	Average Trip Length	18	17.9	-3%
	Total VMT	656,539	650,248	0%
	Total VMT per Service Population	83.6	82.8	1%

Source: Fehr & Peers 2023; Appendix F

Impacts related to geometric hazards would be reduced in the South Coast and Santa Maria Valley. For example, as described for the proposed Project, Patterson Avenue from Hollister Avenue to U.S. Highway 101 could experience an increase of over 32,000 ADT from the maximum potential development of the potential rezone sites within the South Patterson Agricultural Area. With the elimination of Rezone Site No. 2 through No. 7 this increase in ADT would be substantially reduced and may no longer exceed the design capacity of the roadway and intersections serving the area.

Nevertheless, other areas of the County would continue to experience substantial increases in ADT. For example, Old Town Orcutt could experience an additional 27,000 ADT from new housing at the eastern end of Clark Avenue from Rezone Site Nos. 22 (Key Site 10), 23 (Key Site 16), and 31 (Element Church). Substantial increases could exceed the design capacity of the roadway and intersections serving the neighborhood and lead to traffic safety issues. With the implementation of mitigation measures described in Section 3.14, *Transportation*, impacts would remain potentially *significant but mitigable*, as described for the proposed Project.

Utilities and Water Supply

While the Reduced Project A Alternative would result in an approximate 23.5 percent reduction in residential development and an approximate 14.5 percent reduction in commercial development, future development under the Reduced Project A Alternative would continue to require construction of new utility service connections and increase demand for utility supplies and services throughout the county. Similar to the proposed Project, increases in demand for services or supplies at a given location may also trigger the need for the construction of new laterals and/or the replacement/expansion of existing infrastructure, which could cause significant physical environmental impacts. Impacts associated with the construction, expansion, or replacement of utilities would be reduced as compared to the proposed Project due to the removal of the nine potential rezone sites from consideration under the Potential Rezone Program; however, impacts would remain similar to the proposed Project. All mitigation measures identified in Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.8, *Hydrology and Water Quality,* and Section 3.11, *Noise* would be required to reduce construction-related impacts to the maximum extent feasible; however, impacts would remain *significant and unavoidable* due to the scale and location of housing in areas that are currently undeveloped or underutilized.

The reduction in total potential development under the Reduced Project A Alternative would also result in a decrease in impacts associated with demand for domestic water which could exceed the availability of projected future water supplies under normal, single dry-year, and multiple dry-year conditions. The Reduced Project A Alternative does not involve any changes to the proposed Project within the Lompoc Valley, Santa Ynez Valley, and Cuyama Valley, and impacts to existing systems or service capabilities in those areas would remain the same as described for the proposed Project. However, by eliminating consideration of the nine rezone sites located in the South Coast and Santa Maria Valley, the Reduced Project A Alternative would reduce impacts associated with the utility service providers of those regions. In particular, the Reduced Project A Alternative eliminates Rezone Site Nos. 2 through 7 in the South Coast, which are all located within the service area of the Goleta Water District. By eliminating these sites from consideration for rezoning of potential residential development, the Reduced Project A Alternative has the potential to result in the development of up to 73 new SFDs and 8,047 new MFDs within the Goleta Water District's service area, which could generate an estimated demand for 1,258.8 acre-feet per year (AFY) of Goleta Water District supplies (down from 2,196.38 AFY under the proposed Project). Under normal year conditions, the Reduced Project A Alternative has the potential to result in additional demand for up to 26 percent of the Goleta Water District's projected available water supplies (down from 46 percent under the proposed Project), increasing to 41 percent under single dry-year conditions (down from 71 percent under the proposed Project), representing a substantial reduction in Goleta Water District water supplies when compared to the proposed Project. However, future demand for Goleta Water District water supplies under this alternative has the potential to exceed available supplies. Therefore, impacts on water

supplies under the Reduced Project A Alternative would overall be less adverse than those described for the proposed Project, but would remain *significant and unavoidable*.

The elimination of Rezone Site Nos. 2 through 7 would reduce future wastewater generation and demand for wastewater treatment capacity of the Goleta Sanitary District when compared to the proposed Project. The Reduced Project A Alternative has the potential to increase wastewater generation within the Goleta Sanitary District service area by an estimated 1,258.8 AFY, or 1.12 MGD (down from 2.19 MGD under the proposed Project). The Goleta Sanitary District has adequate remaining wastewater treatment capacity to serve future development under the Reduced Project A Alternative. Within the Santa Maria Valley, the Reduced Project A Alternative potential to increase wastewater generation within the Laguna Sanitation District service area by an estimated 1,794.8 AFY, or 1.6 MGD (down from 2.0 MGD under the proposed Project). However, as described in Section 3.15, *Utilities and Water Supply,* while the Laguna County Sanitation District has adequate remaining treatment capacity, the treatment system is limited by its discharge capacity, and the increase in wastewater generated under the Reduced Project A Alternative would continue to exceed the capacity of the system. Further, given the Reduced Project A Alternative does not involve any changes to buildout within the service area of the Los Alamos CSD which does not have adequate treatment capacity to serve future development, implementation of this alternative would continue to result in significant impacts. Impacts would be less adverse than those described for the proposed Project, but would remain *significant and unavoidable.*

With regard to solid waste, when compared to the proposed Project, the reduction in total potential buildout under the Reduced Project A Alternative would result in a reduction in the generation of solid waste that would be disposed at local and regional waste disposal facilities. Buildout under the Reduced Project A Alternative would have the potential to generate up to a combined total of 190.5 tons per day (tpd), or 69,837.7 tpy of solid waste (down from 245.53 tpd or 89,509.35 tpy under the proposed Project), which would not exceed the County's adopted thresholds of 196 tpy of additional waste generated. Therefore, impacts would be substantially less adverse, as the *significant and unavoidable* solid waste impact under the proposed Project would be reduced to *insignificant.*

Wildfire

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be included for consideration for rezoning. Of the nine sites planned to be eliminated from consideration under the Potential Rezone Program under this alternative, only Rezone Site No. 24 (Key Site 26) is mapped as being at increased threat for wildfire threats. Portions of Rezone Site No. 24 (Key Site 26) are mapped within the WUI Influence Zone. By eliminating Rezone Site No. 24 (Key Site 26) from consideration under the Potential Rezone Program, this alternative would avoid impacts associated with the potential development of 27.7 acres of land within the WUI Influence Zone that would otherwise be rezoned under the proposed Project. Overall, eliminating these sites would result in only a nominal reduction in wildfire hazard impacts in the Santa Maria Valley when compared to the proposed Project. As described for the proposed Project, the Reduced Project A Alternative could still expose existing or future residents to increases in pollutant concentrations related to wildfire and/or the uncontrolled spread of wildfire. Overall, impacts related to wildfire under the Reduced Project A Alternative would be similar to those described in Section 3.16, *Wildfire,* and would remain *significant and unavoidable*. Impacts related to adopted emergency response plans or emergency evacuation plans would be similar to those described for the proposed Project and would remain *insignificant*. Additionally, the Sustainable Communities Strategy Alternative would not substantially expose people or structures to significant

post-wildfire risks. Impacts would be similar to those described for the proposed Project and would remain *insignificant*.

Conclusion and Relationship to Project Objectives

Under the Reduced Project A Alternative, the same components of the Housing Element Update would be implemented but with fewer sites considered for rezoning. This alternative would eliminate Rezone Site Nos. 2 through 7 in the South Patterson Agricultural Area of the South Coast and Rezone Site Nos. 24 (Key Site 26), 26 (North Point HOA), and 27 (Boys and Girls Club) within Orcutt in the Santa Maria Valley. By doing so this alternative would accommodate the County's RHNA plus the 15 percent buffer for lower- to moderate-income units, while substantially reducing impacts to agricultural resources, hazards and hazardous materials, land use and planning, noise, and utilities and water supply within the South Coast and Santa Maria Valley.

Table 4-9. Reduced Project A Alternative – Comparison to Project Objectives

Project Objective	Ability for Alternative to Achieve Objective
1. Rezone sites to accommodate the County's state-mandated 6th Cycle RHNA (5,644 units) plus 15 percent buffer for the lower- and moderate-income categories (576 units), which total 6,240 units.	This alternative would reduce the total amount of potential development as compared to the proposed Project but would continue to accommodate the County's state-mandated 6th Cycle RHNA plus a 15 percent buffer for the lower- and moderate-income categories.
2. Promote housing development on infill sites and maximize housing capacity by rezoning at higher densities to facilitate multifamily housing to accommodate housing for lower- and moderate-income households.	This alternative would remove Rezone Site Nos. 2 through 7 in the South Patterson Agricultural Area as well as three sites within Orcutt. Even with the removal of these sites in the Urban Area, this alternative would continue to promote housing development on infill sites. Housing capacity would continue to be maximized by rezoning at higher densities; however, the number of sites considered for potential rezoning would be reduced.
3. Promote a jobs-to-housing balance countywide by facilitating the development of sufficient and affordable housing in close proximity to job centers and essential community services.	This alternative would eliminate nine potential rezone sites within the South Coast and Santa Maria Valley. Nevertheless, this alternative would achieve the objective of promoting a jobs-to-housing balance countywide, though to a lesser extent than the proposed Project.
4. Encourage diverse housing types that meet the requirements of special needs households.	This alternative would enable a slight reduction in residential and mixed use development as compared to the proposed Project but would encourage diverse housing types that meet the requirements of special needs households.
5. Promote equal housing opportunities and locational choices for all persons in all housing types.	The elimination of sites from consideration that are located in the South Coast and Santa Maria Valley would not substantially reduce the diversity and locational choices of housing as compared to the proposed Project

Table 4-9. Reduced Project A Alternative – Comparison to Project Objectives (Continued)

Project Objective	Ability for Alternative to Achieve Objective
6. Promote and support fair housing choice and fair housing public outreach programs.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to promote and support fair housing choice and fair housing public outreach programs.
7. Collaborate with developers to improve and conserve affordable housing units and provide gap financing for affordable units.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to promote collaboration with developers to improve and conserve affordable housing units and provide gap financing for affordable units.
8. Reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.
9. Prioritize housing for people who live and/or work within Santa Barbara County.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to prioritize housing for people who live and/or work within Santa Barbara County.
10. Ensure new housing sites have adequate infrastructure and do not face significant environmental constraints.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley and would reduce potential constraints on existing infrastructure within the Eastern Goleta Valley and Orcutt.

4.5.4 Alternative 4 — Reduced Project B

The Reduced Project B Alternative would implement all of the same components of the proposed Project, including the Housing Element Update goals, policies, and programs. However, the Reduced Project B Alternative would include a modified sites inventory that includes fewer sites for consideration under the Potential Rezone Program. Specifically, under the Reduced Project B Alternative, the following sites would not be considered for rezoning:

- South Coast Rezone Sites Eliminated from Potential Rezone Program
  - Site No. 2 (St. Athanasius Church)
  - Site No. 3 (Scott)
  - Site No. 4 (Ekwill)
  - Site No. 11 (Glen Annie)
- North County Sites Eliminated from Potential Rezone Program
  - Site No. 19 (Key Site 1)
  - Site No. 23 (Key Site 16)

Under the Reduced Project B Alternative, these sites would not be included as potential rezones and would thus be limited to land uses and development allowed under the existing County zoning ordinances. In addition to the removal of these sites from consideration for rezoning, the Reduced Project B Alternative would modify the potential residential zoning district for Rezone Site No. 24 (Key Site 26) from DR-30/40 under the proposed Project to DR-20/30, thereby decreasing the

capacity for housing on this site under this alternative. As summarized in Table 4-10, modifications to the potential rezone sites would reduce potential new development compared to the proposed Project. Maximum potential housing development under the Reduced Project B Alternative would include approximately 13,388 units in the South Coast and 13,297 units in the North County, for a total of 26,685 units countywide, approximately 22.8 percent less than the proposed Project. An estimated 1,300 units (4.9 percent) would be SFDs and an estimated 25,385 units (95.1 percent) would be MFDs (Table 4-11). By eliminating six potential rezone sites and reducing density at one potential rezone site and thereby allowing only continued development of these sites under the existing zoning standards, implementation of the Reduced Project B Alternative would result in the potential development of up to 1,634,496.8 square feet of commercial development (Table 4-12).

Table 4-10. Reduced Project B Alternative Maximum Housing Buildout Summary

	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Total Units					
Existing Vacant Sites	528	143	2,929	544	--
Rezones	11,448	428	6,692	305	1,812
County-owned Sites	320	--	--	--	--
Pending Projects	1,092	350	--	61	33
Total by HMA	13,388	921	9,621	910	1,845
Total by RHNA Region	13,388	13,297			
Total Unincorporated County	**26,685**				

Table 4-11. Reduced Project B Alternative Maximum Buildout Single-Family and Multifamily Dwellings

	SFDs (% Total Buildout)		MFDs (% Total Buildout)		Total (% Total Buildout)	
South Coast	306	1.2%	13,082	49.0%	13,388	50.2%
North County	994	3.7%	12,303	46.1%	13,297	49.8%
Lompoc Valley	*126*	*0.5%*	*795*	*3.0%*	*921*	*3.5%*
Santa Maria Valley	*698*	*2.6%*	*8,923*	*33.4%*	*9,621*	*36.1%*
Santa Ynez Valley	*170*	*0.6%*	*740*	*2.8%*	*910*	*3.4%*
Cuyama Valley	*--*	*0.0%*	*1,845*	*6.9%*	*1,845*	*6.9%*
Total Unincorporated County	**1,300**	**4.9%**	**25,385**	**95.1%**	**26,685**	**100.0%**

Table 4-12. Reduced Project B Alternative Commercial Buildout Summary

	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Commercial Square Feet					
Existing Vacant Sites	14,374.8	3,484.8	355,885.2	79,497.0	--
Rezones	--	35,501.4	889,443.6	--	206,910.0
County-owned Sites	--	--	--	--	--
Pending Projects	--	48,290.0	--	--	1,110.0
Total by HMA	14,374.8	87,276.2	1,245,328.8	79,497.0	208,020.0
Total by RHNA Region	14,374.8	1,620,122.0			
Total Unincorporated County	**1,634,498.8**				

Aesthetics and Visual Resources

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezones. Eliminating these sites from the Potential Rezone Program under this alternative would reduce overall development within the existing Urban Area of the South Coast and Santa Maria Valley. Additionally, the Reduced Project B Alternative would modify the potential residential zoning district for Rezone Site No. 24 (Key Site 26) from DR-30/40 under the proposed Project to DR-20/30. As described for the proposed Project, higher-density development within the urbanized areas would generally not result in substantial changes to the visual character of existing scenic vistas or State Scenic Highways. Impacts described for the proposed Project, including potential development of Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11), which would potentially be visible from Clark Avenue, a locally designated public view corridor and visual resource in Orcutt, would remain under this alternative. Therefore, the Reduced Project B Alternative would not avoid or reduce impacts on such resources. Impacts would remain similar to those described for the proposed Project in Section 3.1, *Aesthetics and Visual Resources,* and would remain *significant and unavoidable.*

The implementation of the Reduced Project B Alternative would substantially reduce potential impacts on existing visual character and quality of public views. For example, Rezone Site No. 11 (Glen Annie) is located in the Rural Area and potential development under the proposed Project would transform this golf course, which is surrounded by natural areas and agricultural uses, into a residential neighborhood with up to 40 du/ac and four stories or more. This potential development would be highly visible from public vistas in the foothills and local public roads, such as Glen Annie and Foothill Road, and would dramatically change the visual character of the site and the surrounding area. Similarly, under the proposed Project, the development of Rezone Site No. 23 (Key Site 16) in Orcutt would involve the conversion of open land to mixed use development of up to 40 du/ac and four stories or more on Clark Avenue on the western edge of Old Town Orcutt. This potential development would dramatically change the character of the site and obstruct clear views of the Casmalia Hills from Clark Avenue. Under the Reduced Project B Alternative, these sites would be removed from consideration for rezoning reducing impacts.

Nevertheless, the Reduced Project B Alternative would continue to result in impacts related to visual character or the quality of public views or otherwise generate impacts related to inconsistency with

County policy for visual and aesthetic resources. For example, in Eastern Goleta Valley, Rezone Site No. 12 (St. Vincent's East) and No. 13 (St. Vincent's West) are located on either side of a designated scenic corridor (SR 154) and at the designated community gateway, where policies and development standards aim to ensure the scenic value of visual resources, public vistas, and scenic local routes and view corridors will be preserved and enhanced. in Eastern Goleta Valley, Rezone Site No. 12 (St. Vincent's East) and No. 13 (St. Vincent's West) are located on either side of a designated scenic corridor (SR 154) and at the designated community gateway, where policies and development standards aim to ensure the scenic value of visual resources, public vistas, and scenic local routes and view corridors will be preserved and enhanced. As described for the proposed Project it is foreseeable that the proposed Project would facilitate housing development that could substantially change the visual character of the site and surrounding area and would be inconsistent with applicable zoning codes and regulations, including community plan development standards. Impacts would remain similar to those described for the proposed Project in Section 3.1, *Aesthetics and Visual Resources,* and would remain *significant and unavoidable* even after the implementation of the required mitigation described in Section 3.1, *Aesthetics and Visual Resources.*

Similar to the proposed Project, implementation of this alternative would not result in any potential inconsistencies with light and glare, and associated impacts would remain *insignificant.*

Agricultural Resources

Under the Reduced Project B Alternative, four sites that support agricultural resources would not be considered for rezones. Rezone Site No. 11 (Glen Annie) would no longer be considered for rezoning. By eliminating this site, which is currently zoned AG-II-40, implementation of the Reduced Project B Alternative would avoid impacts associated with the potential for loss of approximately 94.7 acres of agriculturally zoned lands (currently operated as a golf course) that would otherwise be rezoned for non-agricultural uses under the proposed Project. Additionally, under the Reduced Project B Alternative, Rezone Site Nos. 2 (St. Athanasius Church), 3 (Scott), and 4 (Ekwill), which are located in the South Patterson Agricultural Area, would not be rezoned for residential or mixed use development. By eliminating these sites, the Reduced Project B Alternative would avoid the potential conversion of up to approximately 29.94 acres of Farmland of Statewide Importance and approximately 8.23 acres of Prime Farmland. In total, this would result in an approximate 15 percent reduction in the amount of FMMP land that could be converted to residential uses compared to the proposed Project. The Reduced Project B Alternative would continue to result in the potential conversation of FMMP land, including land within the South Patterson Agricultural Area and San Marcos Agricultural Area, along with conversion of agriculturally zoned lands within the Rural Area (e.g., Rezone Site Nos. 15 [Van Wingerden 1] and, 16 [Van Wingerden 2]) though to a lesser extent than described for the proposed Project. While impacts would be substantially less adverse as compared to those described for the proposed Project in Section 3.2, *Agricultural Resources*, the potential loss of agricultural lands would still be substantial and impacts would remain *significant and unavoidable.*

Air Quality

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. The proposed Project would facilitate residential and mixed use development projects that would result in the generation of criteria air pollutant emissions through the use of heavy construction equipment and mobile source vehicle emissions. As described above, implementation of this alternative would result in a potential

22.8 percent reduction in overall residential development and an approximate 5.5 percent increase in overall commercial development when compared to the proposed Project which would reduce overall cumulative construction and operational emissions by a roughly comparable amount. However, impacts associated with individual development projects would remain similar to those described for the proposed Project and could result in a cumulatively considerable net increase of a criteria pollutant that is in nonattainment in Santa Barbara County. Any housing project involving earth-moving activities would have the potential to exceed SBCAPCD's adopted rules and standards, the potential compounding of construction-related emissions associated with overlapping construction schedules of numerous potential housing development projects, and the potential for exposure of sensitive receptors to substantial pollutant concentrations. Even with the implementation of mitigation measures described in Section 3.1, *Air Quality*, construction-related impacts on air quality would be similar to those described for the proposed Project and would remain *significant and unavoidable.*

Operationally, even with the elimination of the six potential rezone sites and the reduction in density at Rzone Site No. 24 (Key Site 26), the reduction in overall development under this alternative would not substantially reduce operational air emissions such that SBCAPCD's thresholds would not be exceeded for a criteria pollutant for which the County is in nonattainment. Therefore, impacts would be less than those described for the proposed Project but would remain *significant and unavoidable,* even after the implementation of the required mitigation in Section 3.3, *Air Quality*.

Similar to the proposed Project, implementation of this alternative would not result in any potential inconsistencies with applicable air quality plans or policies, nor would this alternative generate objectionable odors, and associated impacts would remain *insignificant.*

Biological Resources

Under the Reduced Project B Alternative, impacts on biological resources from potential housing development would be reduced, but residential and mixed use development could continue to impact sensitive habitats and special-status species. Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. The elimination of potential sites under this alternative could reduce impacts to sensitive habitats and special-status species. For example, Rezone Site No. 11 (Glen Annie) includes riparian habitat within the Riparian Corridor Overlay. Nevertheless, the Reduced Project B Alternative would continue to facilitate residential and mixed use development within other sites throughout the county that support sensitive biological resources. Therefore, even with the implementation of mitigation measures described in Section 3.4, *Biological Resources*, impacts on sensitive biological resources and potential conflicts with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources would be similar to those described for the proposed Project and would remain *significant and unavoidable.*

Cultural Resources and Tribal Cultural Resources

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. Nevertheless, implementation of the Reduced Project B Alternative and elimination of the six potential rezone sites from consideration would not avoid or substantially reduce impacts on cultural resources, including prehistoric and historic, archaeological resources, historic resources, and tribal cultural resources. For example, rezone sites with the South Patterson Agricultural Area – including Rezone Site Nos. 2 (St. Athanasius

Church), 3 (Scott), and 4 (Ekwill) – consist of agriculturally zoned lands that are already actively disturbed as a result of active agricultural operations. Additionally, Rezone Site No. 11 (Glen Annie) has been extensively graded during the construction of the existing golf course. Therefore, the potential for previously unknown historic resources or buried archaeological resources to occur at these sites is already low. Under this alternative, remaining sites – particularly in areas located near creek beds, bluffs, and estuaries, which have a greater likelihood of supporting early habitation and use by Native Americans – could contain known or unknown historic resources and/or buried archaeological resources that could be encountered, disturbed, or destroyed as part of the construction of future residential and mixed use development. For example, Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in Orcutt are located along Orcutt Creek and may be in proximity to potentially archaeologically sensitive areas. As described for the proposed Project, any future development under the Reduced Project B Alternative would be required to comply with applicable federal, state, and local policies and regulations that concern the preservation of historical resources and its regulations governing demolition. With the implementation of mitigation measures described in Section 3.5, *Cultural and Tribal Cultural Resources*, impacts to cultural resources and tribal cultural resources would be similar to those described for the proposed Project and would remain *significant but mitigable*.

Energy

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be included for consideration for rezoning. As described above, implementation of this alternative would result in a potential 22.8 percent reduction in overall residential development and an approximate 5.5 percent increase in overall commercial development when compared to the proposed Project, which would likely reduce overall energy demands by roughly a comparable amount. As described for the proposed Project in Section 3.6, *Energy,* future development under this alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with applicable plans, policies, or regulations regarding energy conservation. Impacts on energy under this alternative would be less adverse than those described for the proposed Project and would remain *insignificant.*

Greenhouse Gas Emissions

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. As described for the proposed Project, the implementation of this alternative would facilitate residential and mixed use development that would result in the generation of GHGs during construction and operation. However, as described above, implementation of this alternative would result in a potential 22.8 percent reduction in overall residential development and an approximate 5.5 percent increase in overall commercial development when compared to the proposed Project, which would reduce overall cumulative construction and operational GHG emissions by a roughly comparable amount. As described in Section 3.7, *Greenhouse Gas Emissions,* future development under the proposed Project would not generate GHG emissions exceeding locally adopted thresholds or conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts associated with GHG emissions would be less adverse than those described for the proposed Project and would remain *insignificant.*

Hazards and Hazardous Materials

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. One of the six potential rezone sites (Rezone Site No. 23 [Key Site 16]) that would be eliminated from consideration for rezoning under this alternative includes a known hazardous site. As described in Impact HAZ-2, Rezone Site No. 23 (Key Site 16) overlaps with a hazardous site associated with the Former Orcutt Pump Station. Disturbance of contaminated surface soils or groundwater or the release of hazardous building materials could subject workers, neighboring land uses, and future residents to hazardous substances. Elimination of Rezone Site No. 23 (Key Site 16) from consideration as part of the Potential Rezone Program under this alternative would eliminate a known hazardous site from the sites inventory. The elimination of these sites would reduce the potential impacts related to the disturbance of contaminated soils or groundwater, including contamination from former oil or gas pipelines or well facilities. Nevertheless, as described for the proposed Project, residential and mixed use development under this alternative could still feasibly occur on properties that have experienced prior releases of hazardous materials or wastes. Disturbance of contaminated surface soils or groundwater or the release of hazardous building materials could subject workers, neighboring land uses, and future residents to hazardous substances. With the implementation of mitigation measures described in Section 3.8, *Hazards and Hazardous Materials*, impacts would remain ~~*potentially*~~ *significant but mitigable*.

Further, the elimination of Rezone Site Nos. 2 (St. Athanasius Church), 3 (Scott), and 4 (Ekwill) from consideration under this alternative would eliminate sites located within or partially within Safety Zones 2 and/or 4 of the Santa Barbara Municipal Airport. By avoiding rezoning and development of these sites, impacts associated with airport-related hazards would be substantially less adverse than those described for the proposed Project. The Reduced Project B Alternative continues to include sites as part of the Potential Rezone Program that are located within ALUCP Safety Zones (e.g., the remaining rezone sites within the South Patterson Agricultural Area, which are located within Safety Zone 2 of the Santa Barbara Municipal Airport and various potential rezone sites located with Safety Zone 2 of the Santa Maria Airport). Nevertheless, with the implementation of mitigation measures described in Section 3.8, *Hazards and Hazardous Materials*, impacts would remain ~~*potentially*~~ *significant but mitigable*.

Hydrology and Water Quality Resources

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. As described for the proposed Project construction and associated grading on sites with steep slopes, such as Rezone Site No. 11 (Glen Annie), could result in an increased potential for sediment loading during construction. Elimination of this rezone site under the Reduced Project B Alternative would reduce the potential for downstream water quality impacts. Nevertheless, the remaining sites, including Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3), could still result in potential impacts to surface waters, including Atascadero Creek and Maria Ygnacio Creek. The elimination of Rezone Site Nos. 2 (St. Athanasius Church), 4 (Ekwill), and 5 (Caird 1) from consideration as part of the Potential Rezone Program would reduce the potential for groundwater contamination. As described for the proposed Project, the County reviews all related development permits to ensure compliance with the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance (Ord. No. 4766, 11-9-2010), Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), and the County's SWMP, if applicable. Mandatory compliance

with these measures would ensure development enabled under this alternative would not pollute surface or groundwater resources. Impacts on water quality would be less adverse than those described for the proposed Project in Section 3.9, *Hydrology and Water Quality,* and would remain *insignificant.*

Concerning groundwater supplies and management, the elimination of these rezone sites from consideration as part of the Potential Rezone Program would reduce impacts resulting from increased demand for potable water supplies provided by local groundwater basins, particularly the Goleta Groundwater Basin and Santa Maria Valley Groundwater Basin. Nevertheless, residential and mixed use development associated with the Reduced Project B Alternative would continue to increase demand for and pumping of groundwater in all groundwater basins, including in the Goleta and Santa Maria Valley groundwater basins as well as the Carpinteria, Montecito, Santa Barbara, Foothill, Cuyama Valley, and Santa Maria Valley groundwater basins. Impacts related to groundwater supply would be less adverse than those described for the proposed Project but would remain *significant and unavoidable* due to the potential impacts to the Cuyama Valley and Santa Ynez River Valley groundwater basins, which are high- and medium-priority basins, respectively.

As described for the proposed Project, implementation of this alternative would increase the area of impervious surfaces and could potentially impact groundwater recharge. However, new development causing 1 acre or greater of ground disturbance or creating a certain amount of new or replaced impervious surfaces within the NPDES permit area would be required to comply with the NPDES MS4 Permit; State Water Board Construction General Permit, as applicable; and the Flood Control District's Standard Conditions of Project Plan Approval (Standard Conditions), which stipulate certain requirements for onsite surface retention and underground stormwater chambers depending on the size of the project to reduce post-development peak stormwater runoff and encourage groundwater recharge. Additionally, the County's compliance with state and local regulations governing water quality would ensure that development projects use BMPs that would limit impacts where future projects have the potential to impact groundwater recharge. Further, future development is not expected to interfere with potential recharge projects due to the expansive nature of recharge aquifers and the relatively small scale of potential housing sites. Impacts would remain similar to those described for the proposed Project and would be *insignificant*.

The elimination of Rezone Site No. 2 (St. Athanasius Church) and No. 4 (Ekwill) from consideration as part of the Potential Rezone Program would also decrease the potential for residential and mixed use development within a FEMA Special Flood Hazard Area. Nevertheless, the implementation of flood hazard development standards would continue to be required to ensure that this impact would remain *significant but mitigable*. Impacts related to flooding within coastal areas susceptible to tsunami and areas downstream of reservoirs and lakes that could be susceptible to flooding due to seiche would remain similar to those described for the proposed Project and would be *insignificant*.

As described for the proposed Project, potential residential and mixed use development under this alternative would potentially conflict with the GSPs for the Cuyama Valley, San Antonio Creek Valley, and Santa Ynez River Valley groundwater basins and obstruct the management actions and sustainability strategies for these basins. Impacts under this alternative would remain *significant and unavoidable.*

Land Use and Planning

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. As described in Section 3.10, *Land Use and Planning,* the proposed Project and sites inventory would not result in the division of an established community. The modified list of rezone sites involving the elimination of nine rezone sites within the South Coast and Santa Maria Valley would similarly not divide an established community, and impacts would remain *insignificant.*

The Reduced Project B Alternative could result in physical effects that could potentially conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. This alternative would eliminate six sites from consideration as part of the Potential Rezone Program, including three sites within the South Patterson Agricultural Area, Rezone Site No. 11 (Glen Annie), and two sites within Orcutt. The elimination of these sites would strengthen consistency with the County's agricultural resources policies (e.g., Policy LUR-EGV-3.1 and LUA-EGV-1.5) as well as the ALUCP for the Santa Barbara Airport. With the elimination of Rezone Site No. 11 (Glen Annie) residential and mixed use development would generally be sited more consistent with regional and County policies that support infill development of the Urban Area rather than conversion of and sprawl of urban development in the Rural Area. However, as described above in *Agriculture*, this alternative would continue to result in potential rezones of agricultural land in the South Patterson Agricultural Area and the San Marcos Agricultural Area. As described above in *Hazards and Hazardous Materials*, this alternative would also continue to rezone parcels in Safety Zones 2 and 4. Additionally, as described for the proposed Project this alternative could result in potential inconsistencies related to the Connected 2050 RTP/SCS, CLUP, CZO, County Comprehensive Plan policies, and other local plans and policies. The elimination of potential rezone sites within the Hollister Avenue HQTC and Orcutt would make this alternative less consistent with SB 375, SBCAG's Connected 2050 RTP/SCS, and the County's ATP, which all prioritize housing in VMT-efficient regions of the county. Overall, impacts related to land use and planning under the Reduced Project B Alternative would be similar to those described for the proposed Project in Section 3.10, *Land Use and Planning*, and would be *significant and unavoidable*.

Noise

Construction activities associated with future residential and mixed use development under the Reduced Project B Alternative would result in a temporary increase in noise levels in the vicinity of individual project sites or clusters of such sites, similar to the proposed Project. The elimination of Rezone Site Nos. 2 through 4 would reduce construction noise in the Eastern Goleta Valley, but construction noise levels over 65 dBA L_{eq} would remain due to potential peak construction equipment noise at future residential and mixed use sites. For example, even in Eastern Goleta Valley, construction activities in the remaining sites within the South Patterson Agricultural Area and the San Marcos Agricultural Area could generate noise that would adversely affect the adjacent residential neighborhoods. Nevertheless, the impacts would be similar to those described for the proposed Project. Even with the implementation of mitigation measures described in Section 3.11, *Noise*, necessary to control construction noise generated from specific equipment and phases of development and to limit the duration and timing of construction, noise impacts from temporary construction would remain *significant but mitigable*.

With regard to operational noise, the implementation of the Reduced Project B Alternative would reduce noise along arterial roadways in the Eastern Goleta Valley as compared to the proposed

Project. For example, noise levels along Hollister Avenue would be expected to decrease with the elimination of Rezone Site Nos. 2 through 4. However, increases in noise levels along San Marcos Road and SR 135 would remain *potentially significant*. Nevertheless, as described for the proposed Project, while this alternative would facilitate the development of residential uses within existing noise environments along high-volume highways and roadways, the implementation of site-based noise studies and attenuation features and site-based VMT mitigation measures described in Section 3.11, *Noise* and Section 3.14, *Transportation* would ensure that this impact would remain *significant but mitigable* similar to the proposed Project.

As described for the proposed Project, this alternative would potentially expose new residents or workers to excessive airport noise. With the elimination of potential rezone sites in the South Patterson Agricultural Area, there would be a reduction in the number of potential housing projects within the 60-65 dBA noise contour of the Santa Barbra Airport. Potential housing projects on the South Coast would still be located within the 60-65 dBA noise contour of the Santa Barbara Airport. Similarly, potential housing projects would also still be located within the 60-65 dBA noise contour of the Santa Maria Airport. Nevertheless, as described for the proposed Project, impacts would remain *significant but mitigable* with the implementation of **MM NOI-2 (Noise Study and Site-based Attenuation)**.

Similar to the proposed Project, the construction of housing projects could generate groundborne vibration depending on the construction procedure and equipment used, but vibration levels would not adversely affect sensitive receptors because potential housing projects would not lie within 25 feet of existing offsite structures that would be vulnerable to temporary vibration. Operational noise from stationary sources would not substantially affect sensitive receptors since, similar to the proposed Project, this alternative would result in residential and mixed use projects that do not generate high noise or vibration levels. Therefore, impacts related to groundborne vibration as well as stationary operational noise sources would remain *insignificant* similar to the proposed Project.

Population and Housing

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. By eliminating six potential rezone sites, this alternative would result in a maximum potential buildout of up to 26,685 new residential units, a reduction of approximately 22.8 percent compared to the proposed Project. Consequently, this alternative would have an equivalent reduction in future population growth in unincorporated Santa Barbara County by an estimated 22,753 persons. Despite the reduction in population and housing growth compared to the proposed Project, the Reduced Project B Alternative would continue to result in growth which would exceed projections anticipated in the Connected 2050 RTP/SCS and the regional growth forecasts prepared by SBCAG and the County. Therefore, impacts on population and housing growth under this alternative would be less adverse than those described for the proposed Project in Section 3.12, *Population and Housing,* but impacts would remain *significant and unavoidable*.

With regard to the potential for displacement of a substantial number of people and housing, the six potential rezone sites excluded from consideration under this alternative are all currently sites that do not support existing residential development. Implementation of the Reduced Project B Alternative would continue to include consideration of potential rezone sites that support existing residential uses (e.g., Rezone Site No. 25 [Mariposa Real] and No. 29 [Hummel Cottages]). However, similar to the proposed Project, the overarching goal of the Housing Element Update as a whole is to encourage and

promote the development of housing across all levels of affordability to meet future housing needs in the county. The Reduced Project B Alternative would continue to result in a significant net increase in housing units across all affordability levels and includes programs that aim, in various ways, to protect and expand the housing stock in the county. Therefore, impacts associated with potential displacement of housing and populations would remain similar to those described for the proposed Project and would be *insignificant.*

Public Services and Recreation

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented but with fewer sites considered for rezoning. Similar to the proposed Project, new residential and mixed use development could foreseeably increase the demand for public services; however, impacts would be reduced as compared to the proposed Project due to the elimination of six potential rezone sites from consideration under the Potential Rezone Program.

With regard to fire project services, none of these six rezone sites are in particularly difficult-to-access locations for fire protection services. Other difficult-to-access sites such as Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3) in the South Patterson Agricultural Area, which are located 0.5 and 3.5 miles from Fire Station Nos. 11, 12, and 14 would remain under this alternative. Additionally, Rezone Site No. 12 (St. Vincent's – East) and No. 13 (St. Vincent's – West) at the base of the San Marcos Foothills would also remain. Therefore, while impacts would be less than those described for the proposed Project, this alternative would continue to result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. Even with payment of development impact fees to fund improvements to mitigate impacts associated with inadequate fire protection services and response times, it is unlikely that necessary improvements could be feasibly implemented to adequately mitigate impacts associated with increased demand for service and fire protection response times. Impacts would remain *significant and unavoidable*.

Implementation of the Reduced Project B Alternative would result in a reduction in total buildout and an increase in the ratio of officers-to-population as compared to the proposed Project. As described for the proposed Project, service ratios would be adequate to serve the potential residential and mixed use development and would not warrant the construction or expansion of facilities. Impacts would therefore be similar to the proposed Project and would remain *insignificant.*

Implementation of the Reduced Project B Alternative would also result in a slight reduction in potential impacts related to the construction of new school facilities. A reduction in the total potential buildout under this alternative would reduce future population growth and the increase in population of school-aged children when compared to the proposed Project by approximately 22.8 percent when compared to the proposed Project. Given the location of Rezone Site Nos. 2 through 4 as well as Rezone Site No. 11 (Glen Annie), this reduction in school-aged children as compared to the proposed Project would be most pronounced in the South Coast. As described in Section 3.13, *Public Services and Recreation,* the school districts within the South Coast, Santa Ynez Valley, and Lompoc Valley could accommodate the anticipated increases in student enrollment. While adequate capacity within the Santa Maria Valley and Cuyama Valley is not expected to accommodate increases in student enrollment under the proposed Project or Reduced Project B Alternative, impacts on schools would be reduced through existing regulations with mandatory mitigation fees. SB 50 outlines development fees that are required to be paid by future development before the issuance of building permits. These fees would be used to offset the impact of the additional students through funding modernization,

construction, and/or expansion of school facilities. Under Government Code Section 65995.5, payment of developer fees constitutes full mitigation of impacts to schools. Any proposals for construction or expansion of new or existing schools would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible. Impacts would therefore be less than those described for the proposed Project and would remain *insignificant.*

Similarly, although library use and demand for resources would be expected to increase under the Reduced Project B Alternative, it is not anticipated that the construction of new library facilities would be required. Impacts would be less adverse as compared to those described for the proposed Project and would remain *insignificant.*

As described for the proposed Project, but to a lesser degree, the Reduced Project B Alternative would increase the population with a corresponding increase in the demand for recreational facilities across each of the five HMAs, and depending on levels of use for certain facilities, this alternative could also accelerate the deterioration of public parks and recreation due to intensified overuse. Based on the projected increase in population of 77,120 persons and total public parkland, the Reduced Project B Alternative would result in a ratio of approximately 3.4 acres of parkland for every 1,000 persons (up from 3.1 acres per 1,000 people under the proposed Project). Compared to the County's standard ratio of 4.7 acres of public parkland for every 1,000 residents, this alternative would result in a shortfall of 1.3 acres of parkland for every 1,000 persons. The Reduced Project B Alternative would result in a smaller shortfall and the smaller amount of population growth would reduce the constraints and degradation of existing public parkland and facilities, thereby reducing impacts compared to the proposed Project, particularly within the Eastern Goleta Valley. Nevertheless, while less adverse than those impacts described for the proposed Project, buildout under this alternative would continue to result in potentially significant impacts on recreational facilities. Even with the implementation of the **MM LU-1 (Amendments to Design Residential [DR] Zoning)** described in Section 3.10, *Land Use and Planning*, these impacts would be *significant and unavoidable*, as described for the proposed Project. Construction or expansion of recreational facilities may have an adverse impact on the environment. However, any proposals for construction or expansion of new or existing recreational facilities would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible.

Transportation

This alternative would eliminate sites from consideration as part of the Potential Rezone Program, including three sites within the South Patterson Agriculture Area. Sites within the South Patterson Agriculture Area are one of the few sites near concentrated public transportation options within the county. Therefore, this alternative would be less consistent with the transportation vision, goals, policies, and programs established in the Connected 2050 RTP/SCS, Comprehensive Plan Circulation Element, and/or County Code. Impacts under the Reduced Project B Alternative would be slightly more adverse as compared to those described for the proposed Project and would remain *significant and unavoidable*.

Elimination of the housing sites in the South Coast would reduce countywide VMT, but would not reduce VMT impacts to insignificant levels. This alternative would continue to facilitate residential and mixed use development within the Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and Santa Maria Valley, where VMT impacts would be *significant and unavoidable*, as described for the proposed Project. Table 4-13 presents the VMT results for the Reduced Project B Alternative in comparison to the Future with Housing Element Update (2031) scenario. For the overall county, the total VMT

decreases by 5 percent while the total VMT per service population is 2 percent higher than the proposed Project. The results are also similar by HMA with the South Coast experiencing a 4 percent decrease in total VMT and a 4 percent increase in total VMT per service population, Santa Ynez Valley experiencing a 1 percent decrease in both total VMT and total VMT per service population, and Cuyama Valley experiencing a 1 percent increase in both total VMT and total VMT per service population in comparison to the proposed Project. Santa Maria Valley has the largest reduction in total VMT of 11 percent and a reduction in total VMT per service population of 1 percent. In the Lompoc Valley, the change in total VMT and total VMT per service population is less than 1 percent in comparison to the proposed Project.

Overall, VMT impacts under the Reduced Project B Alternative would remain similar to those described for the proposed Project and would be *significant and unavoidable*.

Table 4-13. Reduced Project B Alternative Vehicle Miles Traveled per Service Population

Region	VMT Metrics	Reduced Project B Alternative (2031)	Future With Housing Element Update (2031)	Percent Change from Proposed Project
Countywide Unincorporated Areas	Daily Vehicle Trips	1,064,202	1,118,595	-5%
	Average Trip Length	10	9.9	1%
	Total VMT	10,601,530	11,127,670	-5%
	Total VMT per Service Population	38.7	37.9	2%
South Coast	Daily Vehicle Trips	512,418	537,407	-5%
	Average Trip Length	8.7	8.7	0%
	Total VMT	4,475,094	4,668,827	-4%
	Total VMT per Service Population	32.4	31.3	4%
Lompoc Valley	Daily Vehicle Trips	128,681	129,078	0%
	Average Trip Length	12	11.9	1%
	Total VMT	1,539,771	1,532,616	0%
	Total VMT per Service Population	54.4	54.2	0%
Santa Ynez Valley	Daily Vehicle Trips	92,931	94,013	-1%
	Average Trip Length	12.6	12.5	1%
	Total VMT	1,168,004	1,176,377	-1%
	Total VMT per Service Population	50.4	50.8	-1%
Santa Maria Valley	Daily Vehicle Trips	293,715	321,697	-9%
	Average Trip Length	9.4	9.6	-2%
	Total VMT	2,759,767	3,099,601	-11%
	Total VMT per Service Population	36.1	36.6	-1%
Cuyama Valley	Daily Vehicle Trips	36,457	36,400	0%
	Average Trip Length	18.1	17.9	1%
	Total VMT	658,893	650,248	1%
	Total VMT per Service Population	83.9	82.8	1%

Source: Fehr & Peers 2023; Appendix F

Impacts related to geometric hazards would be reduced in the South Coast and Santa Maria Valley. For example, as described for the proposed Project, Patterson Avenue from Hollister Avenue to U.S. Highway 101 could experience an increase of over 32,000 ADT from the maximum potential development of the potential rezone sites within the South Patterson Agricultural Area. With the elimination of Rezone Site Nos. 2 through 4 this increase in ADT would be substantially reduced and may no longer exceed the design capacity of the roadway and intersections serving the area. Nevertheless, other areas of the County would continue to experience substantial increases in ADT. For example, Old Town Orcutt could experience an additional 27,000 ADT from new housing at the eastern end of Clark Avenue from Rezone Site Nos. 22 (Key Site 10), 23 (Key Site 16), and 31 (Element Church). Substantial increases could exceed the design capacity of the roadway and intersections serving the neighborhood and lead to traffic safety issues. With the implementation of mitigation measures described in Section 3.14, *Transportation*, impacts would be similar to those described for the proposed Project and would remain potentially *significant but mitigable*.

Utilities and Water Supply

While the Reduced Project B Alternative would result in an approximate 22.8 percent reduction in residential development and an approximate 5.5 percent increase in commercial development, future development under the Reduced Project B Alternative would continue to require the construction of new utility service connections and increased demand for utility supplies and services throughout the county. Similar to the proposed Project, increases in demand for services or supplies at a given location may also trigger the need for the construction of new laterals and/or the replacement/expansion of existing infrastructure, which could cause significant physical environmental impacts. Impacts associated with the construction, expansion, or replacement of utilities would be reduced as compared to the proposed Project due to the removal of the six potential rezone sites from consideration under the Potential Rezone Program; however, impacts would remain similar to the proposed Project. All mitigation measures identified in Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.8, *Hydrology and Water Quality,* and Section 3.11, *Noise* would be required to reduce construction-related impacts to the maximum extent feasible; however, impacts would remain *significant and unavoidable* due to the scale and location of housing in areas that are currently undeveloped or underutilized.

The reduction in total potential development under the Reduced Project B Alternative would also result in a decrease in impacts associated with demand for domestic water which could exceed the availability of projected future water supplies under normal, single dry-year, and multiple dry-year conditions. The Reduced Project B Alternative does not involve any changes to the proposed Project within the Lompoc Valley, Santa Ynez Valley, or Cuyama Valley, and impacts to existing systems or service capabilities in those areas would remain the same as described for the proposed Project. However, by eliminating consideration of the six rezone sites located in the South Coast and Santa Maria Valley, the Reduced Project B Alternative would reduce impacts associated with the utility service providers of those regions. In particular, the Reduced Project B Alternative eliminates Rezone Site Nos. 2 through 4 in the South Coast, which are all located within the service area of the Goleta Water District. By eliminating these sites from consideration for rezoning of potential residential development, the Reduced Project B Alternative has the potential to result in the development of up to 9,715 new MFDs within the Goleta Water District's service area, which could generate an estimated demand for 1,457.3 AFY of Goleta Water District supplies (down from 2,196.38 AFY under the proposed Project). Under normal year conditions, the Reduced Project B Alternative has the potential to result in additional demand for up to 31 percent of the Goleta Water District's projected available

water supplies (down from 46 percent under the proposed Project), increasing to 47 percent under single dry-year conditions (down from 71 percent under the proposed Project), representing a substantial reduction in Goleta Water District water supplies when compared to the proposed Project. However, future demand for Goleta Water District water supplies under this alternative has the potential to exceed available supplies under future multiple dry-year conditions, given the Goleta Water District does not have any surplus water supplies under such conditions.

Additionally, the Reduced Project B Alternative eliminates Rezone Site No. 19 (Key Site 1) and No. 23 (Key Site 16) in the Santa Maria Valley from the Potential Rezone Program and modifies the potential residential zoning district for Rezone Site No. 24 (Key Site 26), thereby decreasing the capacity for housing on this site. All of these sites are within the service area of Golden State Water Company – Orcutt. By eliminating these sites from consideration for rezoning of potential residential development, the Reduced Project B Alternative has the potential to result in the development of up to 676 new SFDs and 8,902 new MFDs within the Golden State Water Company – Orcutt service area, which could generate an estimated demand for 1,815.26 AFY of Golden State Water Company – Orcutt's supplies (down from 2,298.1 AFY under the proposed Project). Under the 2020 Urban Water Management Plan (UWMP), the Golden State Water Company – Orcutt reports having zero shortfalls or surpluses under normal, single dry-year, and multiple dry-year (drought) conditions. However, this is because the Golden State Water Company – Orcutt evaluates trends in current supply and demand conditions regularly to manage its supplies to ensure its ability to meet demands in its service area. Therefore, the proposed Project is not expected to result in the inability of the Golden State Water Company – Orcutt to meet the increased demand generated by future development under the proposed Project, even under drought conditions. Under the Reduced Project B Alternative, demand for municipal water provided by Golden State Water Company – Orcutt would be reduced compared to the proposed Project, so impacts in the Santa Maria Valley would be reduced as compared to the proposed Project.

Overall impacts on water supplies under the Reduced Project B Alternative would be less than those described for the proposed Project but would remain *significant and unavoidable* in other regions (including the South Coast) even after implementation of required mitigation measures described in Section 3.15, *Utilities and Water Supply*.

The elimination of Rezone Site Nos. 2 through 4 and Rezone Site No. 11 (Glen Annie) would reduce future wastewater generation and demand for wastewater treatment capacity of the Goleta Sanitary District and Goleta Sanitary West District when compared to the proposed Project. The Reduced Project B Alternative has the potential to increase wastewater generation within the Goleta Sanitary District service area by an estimated 1.925 MGD (down from 2.19 MGD under the proposed Project). Regardless, potential development under the Reduced Project B Alternative would still exceed the existing capacity or require expansion or improvements to the Goleta Sanitary District's WWTP. Additionally, the Reduced Project B Alternative has the potential to increase wastewater generation within the Goleta West Sanitary District service area by an estimated 0.006 MGD (down from 0.4 MGD under the proposed Project). The Goleta West Sanitary District has adequate remaining wastewater treatment capacity to serve future development under the Reduced Project B Alternative. Within the Santa Maria Valley, the Reduced Project B Alternative has the potential to increase wastewater generation within the Laguna County Sanitation District service area by an estimated 1.6 MGD (down from 2.0 MGD under the proposed Project). However, as described in Section 3.15, *Utilities and Water Supply,* while the Laguna County Sanitation District has adequate remaining treatment capacity, the treatment system is limited by its discharge capacity, and the increase in wastewater generated under the Reduced Project B Alternative would continue to exceed the capacity of the system. Impacts would

be less adverse than those described for the proposed Project, but would remain *significant and unavoidable.*

With regard to solid waste, when compared to the proposed Project, the reduction in total potential buildout under the Reduced Project B Alternative would result in a reduction in the generation of solid waste that would be disposed at local and regional waste disposal facilities. Buildout under the Reduced Project B Alternative would have the potential to generate up to a combined total of 199 tpd, or 72,635 tpy of solid waste (down from 245.23 tpd, or 89,509.35 tpy under the proposed Project), which would still exceed the County's adopted thresholds of 196 tpy of additional waste generated. Therefore, impacts would be less adverse than those described for the proposed Project, but would remain *significant and unavoidable.*

Wildfire

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be included for consideration for rezoning. Of the six sites planned to be eliminated from consideration under the Potential Rezone Program under this alternative, three sites are mapped as being at increased threat for wildfire threats. Rezone Site No. 19 (Key Site 1) and portions of Rezone Site No. 11 (Glen Annie) and No. 23 (Key Site 16) are mapped within the WUI Influence Zone. By eliminating these sites from consideration under the Potential Rezone Program, this alternative would reduce impacts, avoiding a total of 13.32 acres of potential development within the WUI Influence Zone, 31.44 acres of potential development within the Interface Zone, and 20.77 acres of potential development within the Intermix Zone. However, eliminating these sites would not reduce all wildfire hazard impacts in the county as the Reduced Project B Alternative could still expose existing or future residents to increases in pollutant concentrations related to wildfire and/or the uncontrolled spread of wildfire. Overall, impacts related to wildfire under the Reduced Project B Alternative would be less than those described for the proposed Project in Section 3.16, *Wildfire,* but would remain *significant and unavoidable*. Impacts related to adopted emergency response plans or emergency evacuation plans would be similar to those described for the proposed Project and would remain *insignificant*. Additionally, the Sustainable Communities Strategy Alternative would not substantially expose people or structures to significant post-wildfire risks. Impacts would be similar to those described for the proposed Project and would remain *insignificant*.

Conclusion and Relationship to Project Objectives

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented but with fewer sites considered for rezoning. This alternative would eliminate Rezone Site Nos. 2 through 4 in the South Patterson Agricultural Area and Rezone Site No. 11 (Glen Annie) in the South Coast, as well as three sites within Orcutt in the Santa Maria Valley. Additionally, the Reduced Project B Alternative would modify the potential residential zoning district for Rezone Site No. 24 (Key Site 26) from DR-30/40 under the proposed Project to DR-20/30. By doing so this alternative would accommodate the County's RHNA plus the 15 percent buffer for lower- to moderate-income units while substantially reducing impacts to agricultural resources, hazards and hazardous materials, land use and planning, noise, and utilities and water supply within the South Coast and Santa Maria Valley.

Table 4-14. Reduced Project B Alternative – Comparison to Project Objectives

Project Objective	Ability for Alternative to Achieve Objective
1. Rezone sites to accommodate the County's state-mandated 6th Cycle RHNA (5,644 units) plus a 15 percent buffer for the lower- and moderate-income categories (576 units), which total 6,240 units.	This alternative would reduce the total amount of potential development as compared to the proposed Project but would continue to accommodate the County's state-mandated 6th Cycle RHNA plus a 15 percent buffer for the lower- and moderate-income categories.
2. Promote housing development on infill sites and maximize housing capacity by rezoning at higher densities to facilitate multifamily housing to accommodate housing for lower- and moderate-income households.	This alternative would remove Rezone Site Nos. 2 through 4 in the South Patterson Agricultural Area and two sites within Orcutt. Even with the removal of these sites in the Urban Area, this alternative would continue to promote housing development on infill sites. Housing capacity would continue to be maximized by rezoning at higher densities; however, the number of sites considered for potential rezoning would be reduced.
3. Promote a jobs-to-housing balance countywide by facilitating the development of sufficient and affordable housing in close proximity to job centers and essential community services.	This alternative would eliminate six potential rezone sites within the South Coast and Santa Maria Valley. Nevertheless, this alternative would achieve the objective of promoting a jobs-to-housing balance countywide, though to a lesser extent than the proposed Project.
4. Encourage diverse housing types that meet the requirements of special needs households.	This alternative would enable a slight reduction in residential and mixed use development as compared to the proposed Project but would encourage diverse housing types that meet the requirements of special needs households.
5. Promote equal housing opportunities and locational choices for all persons in all housing types.	The elimination of sites from consideration that are located in the South Coast and Santa Maria Valley would not substantially reduce the diversity and locational choices of housing as compared to the proposed Project.
6. Promote and support fair housing choice and fair housing public outreach programs.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to promote and support fair housing choice and fair housing public outreach programs.
7. Collaborate with developers to improve and conserve affordable housing units and provide gap financing for affordable units.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to promote collaboration with developers to improve and conserve affordable housing units and provide gap financing for affordable units.
8. Reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.

Table 4-14. Reduced Project B Alternative – Comparison to Project Objectives (Continued)

Project Objective	Ability for Alternative to Achieve Objective
9. Prioritize housing for people who live and/or work within Santa Barbara County.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to prioritize housing for people who live and/or work within Santa Barbara County.
10. Ensure new housing sites have adequate infrastructure and do not face significant environmental constraints.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley and would reduce potential constraints on existing infrastructure within the Eastern Goleta Valley and Orcutt.

4.5.5 Alternative 5 — Reduced Project C

The Reduced Project C Alternative would implement all of the same components of the proposed Project, including the Housing Element Update goals, policies, and programs. However, the Reduced Project C Alternative would include a modified sites inventory that includes fewer sites for consideration under the Potential Rezone Program. Specifically, under the Reduced Project C Alternative, the following sites would not be considered for rezoning:

- South Coast Rezone Sites Eliminated from Potential Rezone Program
  - Site No. 1 (Giorgi)
  - Site No. 10 (McCloskey Lelande)
  - Site No. 17 (Montessori)
- North County Sites Eliminated from Potential Rezone Program
  - Site No. 21 (Key Site 10)
  - Site No. 22 (Key Site 11)

Under the Reduced Project C Alternative, these sites would not be included as potential rezones and would thus be limited to land uses and development allowed under the existing zoning ordinances. In addition to the removal of these sites from the Potential Rezone Program, the Reduced Project C Alternative would modify the potential residential zoning district for Rezone Site No. 23 (Key Site 16) from DR-30/40 under the proposed Project to DR-20/30, thereby reducing the capacity of the site for additional housing. As summarized in Table 4-15 below, these modifications to the potential rezone sites would reduce potential new development compared to the proposed Project. Maximum potential housing development under the Reduced Project C Alternative would include approximately 13,724 units in the South Coast and 14,832 units in the North County, for a total of 28,556 units countywide, approximately 18.4 percent less than the proposed Project. An estimated 1,407 units (4.9 percent) would be SFDs and an estimated 27,149 units (95.1 percent) would be MFDs (Table 4-16). By eliminating five potential rezone sites and reducing density at one potential rezone site and thereby allowing only continued development of several sites under the existing zoning standards, implementation of the Reduced Project C Alternative would result in the potential development of up to 1,560,686.0 square feet of commercial development (Table 4-17).

Table 4-15. Reduced Project C Alternative Maximum Housing Buildout Summary

	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Total Units					
Existing Vacant Sites	528	143	2,929	544	--
Rezones	11,783	428	8,227	305	1,812
County-owned Sites	320	--	--	--	--
Pending Projects	1,092	350	--	61	33
Total by HMA	13,723	921	11,156	910	1,845
Total by RHNA Region	13,723	14,832			
Total Unincorporated County	**28,555**				

Table 4-16. Reduced Project C Alternative Maximum Buildout Single-Family and Multifamily Dwellings

	SFDs (% Total Buildout)		MFDs (% Total Buildout)		Total (% Total Buildout)	
South Coast	379	1.3%	13,344	46.7%	13,723	48.1%
North County	1,027	3.6%	13,805	48.4%	14,832	51.9%
Lompoc	*126*	*0.4%*	*795*	*2.8%*	*921*	*3.2%*
Santa Maria	*731*	*2.6%*	*10,425*	*36.5%*	*11,156*	*39.1%*
Santa Ynez	*170*	*0.6%*	*740*	*2.6%*	*910*	*3.2%*
Cuyama	*--*	*0.0%*	*1,812*	*6.5%*	*1,845*	*6.5%*
Total Unincorporated County	1,406	4.9%	27,149	95.1%	28,555	100.0%

Table 4-17. Reduced Project C Alternative Commercial Buildout Summary

	South Coast	North County			
		Lompoc	Santa Maria	Santa Ynez	Cuyama
Commercial Square Feet					
Existing Vacant Sites	14,374.8	3,484.8	355,885.2	79,497.0	--
Rezones	--	35,501.4	815,007.6	--	206,910.0
County-owned Sites	--	--	--	--	--
Pending Projects	--	48,290.0	--	--	1,110.0
Total by HMA	14,374.8	87,276.2	1,170,892.8	79,497.0	208,020.0
Total by RHNA Region	14,374.8	1,545,686.0			
Total Unincorporated County	**1,560,060.8**				

Aesthetics and Visual Resources

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezones. Eliminating these sites from the Potential Rezone Program under this alternative would reduce overall development within existing urban areas of the South Coast and Santa Maria Valley. Under this alternative Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) would be eliminated. These sites are visible from Clark Avenue, which is a locally designated public view corridor and visual resource in Orcutt. Therefore, the elimination of these sites from consideration for rezoning under the Reduced Project C Alternative would reduce impacts on scenic vistas. Nevertheless, on the South Coast, Rezone Site No. 12 (St. Vincent's East) and No. 13 (St. Vincent's West), would remain in the sites inventory. These sites are located at the base of the San Marcos Foothills, an area that is highly visible from SR 154, a designated State Scenic Highway, the Eastern Goleta Valley Gateway at SR 154 and State Street, and the San Marcos Foothills Preserve and Park. Development on these sites could involve up to four-story buildings or more on either side of SR 154. Therefore, impacts to scenic vistas and State Scenic Highway would remain *significant and unavoidable.*

As described for the proposed Project this alternative could result in potential impacts on visual character or quality of public views or otherwise generate impacts related to inconsistency with County policy for visual and aesthetic resources. This is particularly true for higher-density housing and mixed use development of 20 to 40 du/ac and up to four stories or more on large properties that are currently undeveloped and contain visual resources. These project sites include natural habitat areas, vegetation, waterways, or sites that are otherwise located in the Rural Area, provide views of hillsides, and/or support existing agriculture against high-value visual settings. The removal of sites considered for rezoning within the South Patterson Agricultural Area would reduce this potential impact as it relates to agricultural sites in the Urban Area. However, impacts in the Rural Area, including potential impacts associated with Rezone Site No. 11 (Glen Annie) on the South Coast and Rezone Site No. 23 (Key Site 16) in the Santa Maria Valley would remain. Rezone Site No. 11 (Glen Annie) would transform a golf course surrounded by natural areas and agricultural uses into a residential neighborhood with up to 40 du/ac and four stories or more, which would be highly visible from public vistas in the foothills and local public roads. Rezone Site No. 23 (Key Site 16) is located on the fringe of the Urban Area but would substantially change the existing open land and rural character of western Orcutt if rezoned and developed. Therefore, impacts would be less adverse than those described for the proposed Project in Section 3.1, *Aesthetics and Visual Resources*, but would remain *significant and unavoidable*, even after the implementation of the required mitigation described in Section 3.1, *Aesthetics and Visual Resources.*

Similar to the proposed Project, implementation of this alternative would not result in any potential inconsistencies with light and glare, and associated impacts would remain *insignificant.*

Agricultural Resources

Under the Reduced Project C Alternative, three sites that support agricultural resources would not be considered for rezoning. By eliminating rezone sites consisting of agriculturally zoned parcels within the South Coast – including Rezone Site Nos. 1 (Giorgi), 10 (McCloskey Lelande), and 17 (Montessori) – implementation of the Reduced Project C Alternative would reduce impacts associated with the potential conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance as well as existing agriculturally zoned lands to non-agricultural uses. By eliminating Rezone Site No. 1 (Giorgi) from consideration under the Potential Rezone Program, this alternative would avoid

impacts associated with the potential for loss of 64.8 acres of Prime Farmland and/or Farmland of Statewide Importance that would otherwise be rezoned under the proposed Project. Further, by eliminating Rezone Site No. 17, (Montessori) from consideration under the Potential Rezone Program, this alternative would avoid impacts associated with the potential for loss of 11.4 acres of Grazing Lands for rezone under the Reduced Project C Alternative. Therefore, the Reduced Project C Alternative would not avoid the potential conversion of FMMP land under the proposed Project on the South Coast. However, the Reduced Project C Alternative would continue to result in the potential conversation of FMMP land, including sites located within the South Patterson Agricultural Area and the San Marcos Agricultural Area, along with conversion of agriculturally zoned lands within the Rural Area (e.g., Rezone Site Nos. 11 [Glen Annie], 15 [Van Wingerden 1], 16 [Van Wingerden 2]). Therefore, impacts would be less than those described for the proposed Project in Section 3.2, *Agricultural Resources*, but would remain *significant and unavoidable.*

Air Quality

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. The proposed Project would facilitate residential and mixed use development projects that would result in the generation of criteria air pollutant emissions through the use of heavy construction equipment and mobile source vehicle emissions. As described above, implementation of this alternative would result in a potential 18.4 percent reduction in overall residential development and an approximate 0.7 percent increase in overall commercial development when compared to the proposed Project which would reduce overall cumulative construction and operational emissions by a roughly comparable amount. However, impacts associated with individual development projects would remain similar to the proposed Project and could result in a cumulatively considerable net increase of a criteria pollutant that is in nonattainment in Santa Barbara County. Any housing project involving earth-moving activities would have the potential to exceed the SBCAPCD's adopted rules and standards, the potential compounding of construction-related emissions associated with overlapping construction schedules of numerous potential housing development projects, and the potential for exposure of sensitive receptors to substantial pollutant concentrations. Even with the implementation of mitigation measures described in Section 3.1, *Air Quality*, construction-related impacts on air quality would be similar to those described for the proposed Project and would remain *significant but mitigable.*

Operationally, given the overall scale of potential development proposed, the elimination of the five potential rezone sites and the reduction in overall development under this alternative would not substantially reduce operational air emissions such that SBCAPCD's thresholds would not be exceeded. Therefore, impacts would be reduced under the Reduced Project C Alternative but would remain *significant and unavoidable,* even after the implementation of the required mitigation in Section 3.3, *Air Quality*.

Similar to the proposed Project, implementation of this alternative would not result in any potential inconsistencies with applicable air quality plans or policies, nor would this alternative generate objectionable odors, and associated impacts would remain *insignificant*.

Biological Resources

Under the Reduced Project C Alternative, impacts on biological resources from potential housing development would be reduced, but residential and mixed use development could continue to impact

sensitive habitats and special-status species. Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. The elimination of sites under this alternative could reduce impacts to sensitive habitats and special-status species. For example, Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) are traversed by Orcutt Creek, which provides some habitat for federally threatened California red-legged frog (*Rana draytonii*), CDFW species of special concern southwestern pond turtle (*Actinemys pallida*), and some special-status bird species. Nevertheless, the Reduced Project C Alternative would continue to facilitate residential and mixed use development within other sites throughout the county that support sensitive biological resources. For example, in the remaining sites within the South Patterson Agricultural Area, Rezone Site No. 6 (Caird 2) includes riparian woodlands and designated ESH associated with Maria Ygnacio Creek and Atascadero Creek. These creeks also serve as important wildlife corridors, providing a connection between the undeveloped foothill lands and the Goleta Slough. Federally designated critical habitat for the endangered tidewater goby is also mapped within Atascadero Creek immediately downstream of Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3). Therefore, even with the implementation of mitigation measures described in Section 3.4, *Biological Resources*, impacts on sensitive biological resources and potential conflicts with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources would be similar to those described for the proposed Project and would remain *significant and unavoidable.*

Cultural Resources and Tribal Cultural Resources

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. Rezone Site No. 1 (Giorgi) and No. 10 (McCloskey Lelande) consist of agriculturally zoned lands that are already actively disturbed as a result of active agricultural operations. Therefore, the potential for previously unknown historic or buried archaeological resources to occur at these sites is already low. However, the implementation of Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in Orcutt would reduce potential impacts on cultural resources, including prehistoric and historic, archaeological resources, historic resources, and tribal cultural resources. These sites are located along Orcutt Creek and may be in proximity to potentially archaeologically sensitive areas. Nevertheless, under this alternative, remaining sites – particularly in areas located near creek beds, bluffs, and estuaries, which have a greater likelihood of supporting early habitation and use by Native Americans – could contain known or unknown historic resources and/or buried archaeological resources that could be encountered, disturbed, or destroyed as part of the construction of future residential and mixed use development. As described for the proposed Project, any future development under the Reduced Project C Alternative would be required to comply with applicable federal, state, and local policies and regulations that concern the preservation of historical resources and its regulations governing demolition. With the implementation of mitigation measures described in Section 3.5, *Cultural and Tribal Cultural Resources*, impacts to cultural resources and tribal cultural resources would be similar to those described for the proposed Project and would remain *significant but mitigable*.

Energy

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be included for consideration for rezoning. As described above, implementation of this alternative would result in a potential 18.4 percent reduction in overall residential development and an approximate 0.7 percent increase in overall commercial development

when compared to the proposed Project, which would likely reduce overall energy demands by roughly a comparable amount. As described for the proposed Project in Section 3.6, *Energy,* future development under this alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with applicable plans, policies, or regulations regarding energy conservation. Impacts on energy under this alternative would be reduced and would remain *insignificant.*

Greenhouse Gas Emissions

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. The proposed Project would foster potential housing development that would result in the generation of GHGs during construction and operation. However, as described above, implementation of this alternative would result in a potential 18.4 percent reduction in overall residential development and an approximate 0.7 percent increase in overall commercial development when compared to the proposed Project, which would reduce overall cumulative construction and operational GHG emissions by a roughly comparable amount. As described in Section 3.7, *Greenhouse Gas Emissions,* future development under the proposed Project would not generate GHG emissions exceeding locally adopted thresholds or conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts on energy would be less adverse than those described for the proposed Project and would remain *insignificant.*

Hazards and Hazardous Materials

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. One of the five potential rezone sites (Rezone Site No. 17 [Montessori]) eliminated under this alternative includes known hazardous sites. As described in Impact HAZ-2, Rezone Site No. 17 (Montessori) overlaps with an open cleanup program site in Eastern Goleta Valley within the South Coast. Additionally, former well facilities and oil and gas pipelines extend south through the foothills and are tied into the Cat Canyon Oil Field and the Orcutt Hill Oil Field, which abuts Rezone Site No. 21 (Key Site 10). Elimination of these site from consideration as part of the Potential Rezone Program under this alternative would reduce the potential impacts related to the disturbance of contaminated soils or groundwater. Nevertheless, as described for the proposed Project, residential and mixed use development under this alternative could still feasibly occur on properties that have experienced prior releases of hazardous materials or wastes. Disturbance of contaminated surface soils or groundwater or the release of hazardous building materials could subject workers, neighboring land uses, and future residents to hazardous substances. With the implementation of mitigation measures described in Section 3.8, *Hazards and Hazardous Materials*, impacts would remain ~~*potentially*~~ *significant but mitigable*.

The elimination of Rezone Site No. 1 (Giorgi) from consideration as part of the Potential Rezone Program under this alternative eliminates a site located within Safety Zone 2 of the Santa Barbara Municipal Airport. By avoiding rezoning and development of this site, impacts associated with airport-related hazards would be less adverse than those described for the proposed Project. The Reduced Project C Alternative continues to include sites as part of the Potential Rezone Program that are located within ALCUP Safety Zones (e.g., the remaining rezone sites within the South Patterson Agricultural Area, which are located within Safety Zone 2 and/or 4 of the Santa Barbara Municipal Airport and various potential rezone sites located with Safety Zone 2 of the Santa Maria Airport). With

the implementation of mitigation measures described in Section 3.8, *Hazards and Hazardous Materials*, impacts would remain ~~*potentially*~~ *significant but mitigable*.

Hydrology and Water Quality Resources

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. Elimination of Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) from consideration as part of the Potential Rezone Program under this alternative eliminates sites located along Orcutt Creek in the Santa Maria Valley. By avoiding rezoning and development of these sites, the Reduced Project C Alternative would reduce impacts associated with extensive soil disturbance from construction activities. Nevertheless, the remaining sites could still result in potential impacts on surface water features within the county. For example, potential rezone sites within the South Patterson Agricultural Area, including Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3), could result in impacts to Atascadero Creek and Maria Ygnacio Creek.

The elimination of Rezone Site No. 1 (Giorgi) from consideration as part of the Potential Rezone Program would reduce the potential for groundwater contamination. As described for the proposed Project, the County reviews all related development permits to ensure compliance with the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance (Ord. No. 4766, 11-9-2010), Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), and the County's SWMP, if applicable. Mandatory compliance with these measures would ensure development enabled under this alternative would not pollute surface or groundwater resources or violate any water quality standards. Impacts on water quality would be less adverse than those described for the proposed Project and would remain *insignificant.*

Concerning groundwater supplies and management, the elimination of these rezone sites from consideration as part of the Potential Rezone Program would reduce impacts resulting from increased demand for potable water supplies provided by local groundwater basins, particularly the Goleta Groundwater Basin and Santa Maria Valley Groundwater Basin. Nevertheless, residential and mixed use development associated with the Reduced Project C Alternative would continue to increase demand for and pumping of groundwater in all groundwater basins, including in the Goleta and Santa Maria Valley groundwater basins as well as the Carpinteria, Montecito, Santa Barbara, Foothill, Cuyama Valley, and Santa Maria Valley groundwater basins. Impacts related to groundwater supply would be less adverse than those described for the proposed Project but would remain *significant and unavoidable* due to the potential impacts to the Cuyama Valley and Santa Ynez River Valley groundwater basins, which are high- and medium-priority basins, respectively.

As described for the proposed Project, implementation of this alternative would increase the area of impervious surfaces and could potentially impact groundwater recharge. However, new development causing 1 acre or greater of ground disturbance or creating a certain amount of new or replaced impervious surfaces within the NPDES permit area would be required to comply with the NPDES MS4 Permit; State Water Board Construction General Permit, as applicable; and the Flood Control District's Standard Conditions of Project Plan Approval (Standard Conditions), which stipulate certain requirements for onsite surface retention and underground stormwater chambers depending on the size of the project to reduce post-development peak stormwater runoff and encourage groundwater recharge. Additionally, the County's compliance with state and local regulations governing water quality would ensure that development projects use BMPs that would limit impacts where future

projects have the potential to impact groundwater recharge. Further, future development is not expected to interfere with potential recharge projects due to the expansive nature of recharge aquifers and the relatively small scale of potential housing sites. Impacts would remain similar to those described for the proposed Project and would be *insignificant*.

The elimination of Rezone Site No. 1 (Giorgi) from consideration as part of the Potential Rezone Program would also decrease the potential for residential and mixed use development within a FEMA Special Flood Hazard Area. Nevertheless, the implementation of flood hazard development standards would continue to be required to ensure that this impact would remain *potentially significant but mitigable*. Impacts related to flooding within coastal areas susceptible to tsunami and areas downstream of reservoirs and lakes that could be susceptible to flooding due to seiche would remain similar to those described for the proposed Project and would be *insignificant*.

As described for the proposed Project, new residential and mixed use development under this alternative would potentially conflict with the GSPs for the Cuyama Valley, San Antonio Creek Valley, and Santa Ynez River Valley groundwater basins and obstruct the management actions and sustainability strategies for these basins. Impacts under this alternative would remain *significant and unavoidable.*

Land Use and Planning

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be included for consideration for rezoning. As described in Section 3.10, *Land Use and Planning,* the proposed Project and sites inventory would not result in the division of an established community. The modified list of rezone sites involving the elimination of nine rezone sites within the South Coast and Santa Maria Valley would similarly not divide an established community, and impacts would remain *insignificant.*

Reduced Project C Alternative could result in physical effects that could potentially conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. This alternative would eliminate five sites from consideration as part of the Potential Rezone Program. The elimination of these sites would strengthen consistency with the County's agricultural resources policies (e.g., Policy LUR-EGV-3.1 and LUA-EGV-1.5) as well as the ALUCP for the Santa Barbara Airport. However, as described above in *Agriculture*, this alternative would continue to result in agricultural rezones in the South Patterson Agricultural Area and the San Marcos Agricultural Area. As described above in *Hazards and Hazardous Materials*, this alternative would continue the rezoning of parcels in Safety Zones 2 and 4. Additionally, as described for the proposed Project this alternative could result in potential inconsistencies related to the Connected 2050 RTP/SCS, CLUP, CZO, Comprehensive Plan policies, and other local plans and policies. Overall, impacts related to land use and planning under the Reduced Project C Alternative would be similar to those described for the proposed Project in Section 3.10, *Land Use and Planning*, and would be *significant and unavoidable*.

Noise

Construction activities associated with future residential and mixed use development under the Reduced Project C Alternative would result in a temporary increase in noise levels in the vicinity of individual project sites or clusters of such sites. The elimination of Rezone Site Nos. 1 (Giorgi), 10 (McCloskey Lelande), and 17 (Montessori) would reduce construction noise in the Eastern Goleta

Valley, but construction noise levels over 65 dBA L_{eq} would remain. For example, even in Eastern Goleta Valley, construction activities in the remains sites within the South Patterson Agricultural Area and the San Marcos Agricultural Area could generate noise that would adversely affect the adjacent residential neighborhoods. Nevertheless, the impacts would be similar to those described for the proposed Project. With the implementation of mitigation measures described in Section 3.11, *Noise* that would be necessary to control construction noise generated from specific equipment and phases of development and to limit the duration and timing of construction, noise impacts from temporary construction would remain *significant but mitigable*.

With regard to operational traffic noise, the implementation of the Reduced Project C Alternative would reduce noise along arterial roadways in the Eastern Goleta Valley as compared to the proposed Project. For example, noise levels along Hollister Avenue would be expected to decrease. However, increases in noise levels along San Marcos Road and SR 135 would remain *significant and unavoidable*. While this alternative would foster the development of residential uses within existing noise environments along high-volume highways and roadways, the implementation of site-based noise studies and attenuation features would ensure that this impact would remain *potentially significant but mitigable* as described for the proposed Project.

As described for the proposed Project, this alternative would potentially expose new residents or workers to excessive airport noise. With the elimination of one potential rezone site in the South Patterson Agricultural Area there would be a potential reduction in the number of potential housing projects within the 60-65 dBA noise contour of the Santa Barbra Airport. However, the remaining potential rezone sites making up the South Patterson Agricultural Area would remain. Additionally, potential housing projects in the Santa Maria Valley would still be located within the 60-65 dBA noise contour of the Santa Maria Airport. Nevertheless, as described for the proposed Project, impacts would remain *significant but mitigable* with the implementation of **MM NOI-2 (Noise Study and Site-based Attenuation)**.

Similar to the proposed Project, the construction of housing projects could generate groundborne vibration depending on the construction procedure and equipment used, but vibration levels would not adversely affect sensitive receptors because potential housing projects would not lie within 25 feet of existing offsite structures that would be vulnerable to temporary vibration. Operational noise from stationary sources would not substantially affect sensitive receptors since, similar to the proposed Project, this alternative would result in residential and mixed use projects that do not generate high noise or vibration levels. Therefore, impacts related to groundborne vibration as well as stationary operational noise sources would remain *insignificant* similar to the proposed Project.

Population and Housing

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be considered for rezoning. By eliminating five potential rezone sites, this alternative would result in a maximum potential buildout of up to 28,555 new residential units, a reduction of approximately 18.4 percent compared to the proposed Project.

Consequently, this alternative would have an equivalent reduction in future population growth in unincorporated Santa Barbara County by an estimated 17,349 persons. Despite the reduction in population and housing growth compared to the proposed Project, the Reduced Project C Alternative would continue to result in growth which would exceed projections anticipated in the Connected 2050 RTP/SCS and the regional growth forecasts. Therefore, impacts on population and housing growth

under this alternative would be less than those described for the proposed Project in Section 3.12, *Population and Housing,* but impacts would remain *significant and unavoidable*.

Concerning the potential for displacement of a substantial number of people and housing, the five potential rezone sites excluded from consideration under this alternative are all sites that do not support existing residential development. Implementation of the Reduced Project C Alternative would continue to include consideration of potential rezone sites that support existing residential uses (e.g., Rezone Site No. 25 [Mariposa Real] and No. 29 [Hummel Cottages]). However, similar to the proposed Project, the overarching goal of the Housing Element Update as a whole is to encourage and promote the development of housing across all levels of affordability to meet future housing needs in the county. The Reduced Project C Alternative would continue to result in a significant net increase in housing units across all affordability levels and includes programs that aim, in various ways, to protect and expand the housing stock in the county. Therefore, impacts associated with potential displacement of housing and populations would remain similar to the proposed Project and would be *insignificant.*

Public Services and Recreation

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented but with fewer sites considered for rezoning. Similar to the proposed Project, new residential and mixed use development could foreseeably increase the demand for public services; however, impacts would be reduced as compared to the proposed Project due to the elimination of five potential rezone sites from consideration under the Potential Rezone Program.

With regard to fire protection services, none of these six rezone sites that would be eliminated under this alternative are in particularly difficult-to-access locations. Other difficult-to-access sites such as Rezone Site Nos. 5 (Caird 1), 6 (Caird 2), and 7 (Caird 3) in the South Patterson Agricultural Area, are located 0.5 and 3.5 miles from Fire Station Nos. 11, 12, and 14 would remain under this alternative. Additionally, Rezone Site No. 12 (St. Vincent's – East) and No. 13 (St. Vincent's – West) at the base of the San Marcos Foothills would also remain. Therefore, while impacts would be less adverse than those described for the proposed Project, this alternative would continue to result in adverse impacts associated with the need for or provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. Even with payment of development impact fees to fund improvements to mitigate impacts associated with inadequate fire protection services and response times, it is unlikely that necessary improvements could be feasibly implemented to adequately mitigate impacts associated with increased demand for service and fire protection response times. Impacts would remain *significant and unavoidable*.

Implementation of the Reduced Project C Alternative would result in a reduction in total buildout and an increase in the ratio of officers-to-population as compared to the proposed Project. As described for the proposed Project, service ratios would be inadequate to serve the potential development and would not warrant the construction or expansion of facilities. Impacts would therefore be less adverse than those described for the proposed Project and would remain *insignificant.*

Implementation of the Reduced Project C Alternative would also result in a reduction in potential impacts related to the construction of new school facilities. A reduction in the total potential buildout under this alternative would reduce the increase in population of school-aged children when compared to the proposed Project by approximately 17.4 percent when compared to the proposed Project. Given the location of Rezone Site Nos. 1, 10, and 17, this reduction in school-aged children as

compared to the proposed Project would be most pronounced in the South Coast. As described in Section 3.13, *Public Services and Recreation,* the school districts within the South Coast, Santa Ynez Valley, and Lompoc Valley could accommodate the anticipated increases in student enrollment. While adequate capacity within the Santa Maria Valley and Cuyama Valley is not expected to accommodate increases in student enrollment under the proposed Project or Reduced Project C Alternative, impacts on schools would be reduced through existing regulations with mandatory mitigation fees. SB 50 outlines development fees that are required to be paid by future development before the issuance of building permits. These fees would be used to offset the impact of the additional students through funding modernization, construction, and/or expansion of school facilities. Under Government Code Section 65995.5, payment of developer fees constitutes full mitigation of impacts to schools. Any proposals for construction or expansion of new or existing schools would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible. Impacts would therefore be less than those described for the proposed Project and would remain *insignificant.*

Similarly, although library use and demand for resources would be expected to increase under the Reduced Project C Alternative, it is not anticipated that the construction of new library facilities would be required. Impacts would be less adverse than those described for the proposed Project and would remain *insignificant.*

As described for the proposed Project, but to a lesser degree, the Reduced Project C Alternative would increase population and create a corresponding increase in the demand for recreational facilities across each of the five HMAs. Depending on the levels of use for certain facilities, this alternative could also accelerate the deterioration of public parks and recreation due to intensified overuse. Based on the projected increase in population of 82,524 persons and total public parkland, the Reduced Project C Alternative would result in a ratio of approximately 3.3 acres of parkland for every 1,000 persons (up from 3.1 acres per 1,000 people under the proposed Project). Compared to the County's standard ratio of 4.7 acres of public parkland for every 1,000 residents, this alternative would result in a shortfall of 1.3 acres of parkland for every 1,000 persons. The Reduced Project C Alternative would result in a smaller shortfall and the smaller amount of population growth would reduce the constraints and degradation of existing public parkland and facilities, thereby reducing impacts compared to the proposed Project, particularly within the Eastern Goleta Valley and to a lesser extent Orcutt. Nevertheless, while less adverse than those impacts described for the proposed Project, buildout under this alternative would continue to result in potentially significant impacts on recreational facilities. Even with the implementation of the **MM LU-1 (Amendments to Design Residential [DR] Zoning)** described in Section 3.10, *Land Use and Planning*, these impacts would be *significant and unavoidable*, as described for the proposed Project. Construction or expansion of recreational facilities may have an adverse impact on the environment. However, any proposals for construction or expansion of new or existing recreational facilities would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible.

Transportation

This alternative would eliminate five sites from consideration as part of the Potential Rezone Program, including one site within the South Patterson Agriculture Area. Sites within the South Patterson Agriculture Area are one of the few sites near concentrated public transportation options within the county. Therefore, this alternative would be less consistent with the transportation vision, goals, policies, and programs established in the Connected 2050 RTP/SCS, Comprehensive Plan Circulation Element, and/or County Code. Impacts under the Reduced Project C Alternative would be

slightly more adverse as compared to those described for the proposed Project and would remain *significant and unavoidable*.

Elimination of the five potential rezone sites under this alternative would reduce countywide VMT, but would not reduce countywide VMT impacts to insignificant levels. Additionally, this alternative would continue to facilitate residential and mixed use development within the Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and Santa Maria Valley, where VMT impacts would be *significant and unavoidable*, as described for the proposed Project. Table 4-18 presents the VMT results for the Reduced Project C Alternative in comparison to the Future with Housing Element Update (2031) scenario. In comparison to the proposed Project, the countywide total VMT is 2 percent lower while the total VMT per service population is 3 percent higher. When comparing the Reduced Project C Alternative to the proposed Project in each HMA, the South Coast experiences a 1 percent decrease in total VMT and a 6 percent increase in total VMT per service population, the Santa Maria Valley experiences a 7 percent decrease in total VMT and a 2 percent decrease in total VMT per service population, and the Cuyama Valley experiences a 1 percent increase in both total VMT and total VMT per service population. In the Lompoc Valley and Santa Ynez Valley, the change in total VMT and total VMT per service population is less than 1 percent in comparison to the proposed Project.

Overall, VMT impacts under the Reduced Project C Alternative would remain similar to those described for the proposed Project and would be *significant and unavoidable*.

Table 4-18. Reduced Project C Alternative Vehicle Miles Traveled per Service Population

Region	VMT Metrics	Reduced Project C Alternative (2031)	Future With Housing Element Update (2031)	Percent Change from Proposed Project
Countywide Unincorporated Areas	Daily Vehicle Trips	1,094,216	1,118,595	-2%
	Average Trip Length	9.9	9.9	0%
	Total VMT	10,870,578	11,127,670	-2%
	Total VMT per Service Population	39.0	37.9	3%
South Coast	Daily Vehicle Trips	527,468	537,407	-2%
	Average Trip Length	8.8	8.7	1%
	Total VMT	4,624,980	4,668,827	-1%
	Total VMT per Service Population	33.3	31.3	6%
Lompoc Valley	Daily Vehicle Trips	128,808	129,078	0%
	Average Trip Length	11.9	11.9	0%
	Total VMT	1,532,318	1,532,616	0%
	Total VMT per Service Population	54.2	54.2	0%
Santa Ynez Valley	Daily Vehicle Trips	93,558	94,013	0%
	Average Trip Length	12.5	12.5	0%
	Total VMT	1,171,034	1,176,377	0%
	Total VMT per Service Population	50.6	50.8	0%
Santa Maria Valley	Daily Vehicle Trips	307,972	321,697	-4%
	Average Trip Length	9.4	9.6	-2%
	Total VMT	2,887,685	3,099,601	-7%
	Total VMT per Service Population	35.9	36.6	-2%

Table 4-18. Reduced Project C Alternative Vehicle Miles Traveled per Service Population (Continued)

Region	VMT Metrics	Reduced Project C Alternative (2031)	Future With Housing Element Update (2031)	Percent Change from Proposed Project
Cuyama Valley	Daily Vehicle Trips	36,409	36,400	0%
	Average Trip Length	18	17.9	1%
	Total VMT	654,560	650,248	1%
	Total VMT per Service Population	83.4	82.8	1%

Source: Fehr & Peers 2023; Appendix F

Impacts related to geometric hazards would be reduced in the South Coast and Santa Maria Valley. For example, as described for the proposed Project, Patterson Avenue from Hollister Avenue to U.S. Highway 101 could experience an increase of over 32,000 ADT from the maximum potential development of the potential rezone sites within the South Patterson Agricultural Area. With the elimination of Rezone Site Nos. 1, 10, and 17 this increase in ADT would be substantially reduced and may no longer exceed the design capacity of the roadway and intersections serving the area. Nevertheless, other areas of the County would continue to experience substantial increases in ADT. For example, Old Town Orcutt could experience an increase in ADT from new housing at the eastern end of Clark Avenue from Rezone Site No. 23 (Key Site 16) and No. 31 (Element Church). Substantial increases could exceed the design capacity of the roadway and intersections serving the neighborhood and lead to traffic safety issues. With the implementation of mitigation measures described in Section 3.14, *Transportation*, impacts would remain potentially *significant but mitigable*, as described for the proposed Project.

Utilities and Water Supply

While the Reduced Project C Alternative would result in an approximate 18.4 percent reduction in residential development and an approximate 0.7 percent increase in commercial development, future development under the Reduced Project C Alternative would continue to require construction of new utility service connections and increase demand for utility supplies and services throughout the county. Similar to the proposed Project, increases in demand for services or supplies at a given location may also trigger the need for the construction of new laterals and/or the replacement/expansion of existing infrastructure, which could cause significant physical environmental impacts. Impacts associated with the construction, expansion, or replacement of utilities would be reduced as compared to the proposed Project due to the removal of the five potential rezone sites from consideration under the Proposed Rezone Program; however, impacts would remain similar to the proposed Project. All mitigation measures identified in Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.8, *Hydrology and Water Quality,* and Section 3.11, *Noise* would be required to reduce construction-related impacts to the maximum extent feasible; however, impacts would remain *significant and unavoidable* due to the scale and location of housing in areas that are currently undeveloped or underutilized.

The reduction in total potential development under the Reduced Project C Alternative would also result in a decrease in impacts associated with demand for domestic water which could exceed the availability of projected future water supplies under normal, single dry-year, and multiple dry-year conditions. The Reduced Project C Alternative does not involve any changes to the proposed Project within the Lompoc Valley, Santa Ynez Valley, or Cuyama Valley, and impacts to existing systems or

service capabilities in those areas would remain the same as described for the proposed Project. However, by eliminating consideration of the five rezone sites located in the South Coast and Santa Maria Valley, the Reduced Project C Alternative would reduce impacts associated with the utility service providers of those regions. In particular, the Reduced Project C Alternative eliminates Rezone Site Nos. 1 (Giorgi), 10 (McCloskey Lelande), and 17 (Montessori) in the South Coast, which are located within the service area of the Goleta Water District. By eliminating these sites from consideration for rezoning, the Reduced Project C Alternative has the potential to result in the development of up to 73 new SFDs and 9,975 new MFDs within the Goleta Water District's service area, which could generate an estimated demand for 1,548.08 AFY of Goleta Water District supplies (down from 2,196.38 AFY under the proposed Project). Under normal year conditions, the Reduced Project C Alternative has the potential to result in additional demand for up to 33 percent of the Goleta Water District's projected available water supplies (down from 46 percent under the proposed Project), increasing to 50 percent under single dry-year conditions (down from 71 percent under the proposed Project), representing a substantial reduction in Goleta Water District water supplies when compared to the proposed Project. However, future demand for Goleta Water District water supplies under this alternative has the potential to exceed available supplies under future multiple dry-year conditions, given the Goleta Water District does not have any surplus water supplies under such conditions.

Additionally, the Reduced Project C Alternative eliminates Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in the Santa Maria Valley Region from the Rezone Program and modifies the potential residential zoning district for Rezone Site No. 23 (Key Site 16), thereby decreasing the capacity for housing on this site. All of these sites are within the service area of Golden State Water Company – Orcutt. By eliminating these sites from consideration for rezoning of potential residential development, the Reduced Project C Alternative has the potential to result in the development of up to 709 new SFDs and 10,404 new MFDs within Golden State Water Company – Orcutt's service area, which could generate an estimated demand for 2,064 AFY of Golden State Water Company – Orcutt's supplies (down from 2,298.1 AFY under the proposed Project). The proposed Project is not expected to result in the inability of the Golden State Water Company – Orcutt to meet the increased demand generated by future development under the proposed Project, even under drought conditions. Therefore, the increased demand generated by the Reduced Project C Alternative would also not exceed the Golden State Water Company – Orcutt's existing capacity.

Overall impacts on water supplies under the Reduced Project C Alternative would be less than those described for the proposed Project but would remain *significant and unavoidable* in other regions (including the South Coast) even after implementation of required mitigation measures described in Section 3.15, *Utilities and Water Supply*.

With regard to wastewater treatment services, the Reduced Project C Alternative would result in a slight reduction in impacts compared to the proposed Project, but impacts would remain *significant and unavoidable.* The elimination of Rezone Site Nos. 1 (Giorgi), 10 (McCloskey Lelande), and 17 (Montessori) would reduce future wastewater generation and demand for wastewater treatment capacity of the Goleta Sanitary District when compared to the proposed Project. The Reduced Project C Alternative has the potential to increase wastewater generation within the Goleta Sanitary District service area by an estimated 1,548.38 AFY, or 1.61 MGD (down from 2.19 MGD under the proposed Project), which would continue to exceed the existing capacity or require expansion or improvements to the Goleta Sanitary District's WWTP, similar to the proposed Project. Within the Santa Maria Valley, the Reduced Project C Alternative has the potential to increase wastewater generation within the Laguna Sanitation District service area by an estimated 1.79 MGD (down from 2.0 MGD under the

proposed Project). However, as described in Section 3.15, *Utilities and Water Supply,* while the Laguna County Sanitation District has adequate remaining treatment capacity, the treatment system is limited by its discharge capacity, and the increase in wastewater generated under the Reduced Project C Alternative would continue to exceed the capacity of the system. Impacts would be reduced but remain *significant and unavoidable.*

With regard to solid waste, when compared to the proposed Project, the reduction in total potential buildout under the Reduced Project C Alternative would result in a reduction in the generation of solid waste that would be dispose of at local and regional waste disposal facilities. Buildout under the Reduced Project C Alternative would have the potential to generate up to a combined total of 208.7 tpd, or 76,175.5 tpy of solid waste (down from 245.23 tpd, or 89,509.35 tpy under the proposed Project), which would still exceed the County's adopted thresholds of 196 tpy of additional waste generated. Therefore, impacts would be less than those described for the proposed Project, but would remain *significant and unavoidable.*

Wildfire

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented, but fewer sites would be included for consideration for rezoning. Of the five sites that would be eliminated from consideration under the Potential Rezone Program under this alternative, Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) are mapped as being at increased risk for wildfire threats. Rezone Site No. 22 (Key Site 11) is mapped within the WUI Influence Zone, and Rezone Site No. 22 (Key Site 11) is mapped within the WUI Interface Zone. By eliminating these sites from consideration under the Potential Rezone Program, this alternative would avoid impacts associated with the potential development of 19.02 acres of land within the WUI Influence Zone and 19.18 acres within the Interface Zone. Overall, eliminating this site would result in only a nominal reduction in wildfire hazard impacts in the Santa Maria Valley when compared to the proposed Project. As described for the proposed Project, the Reduced Project C Alternative could still expose existing or future residents to increase in pollutant concentrations related to wildfire and/or the uncontrolled spread of a wildfire. Overall, impacts related to wildfire under the Reduced Project C Alternative would be substantially reduced to those described in Section 3.16, *Wildfire,* and would remain *significant and unavoidable*. Impacts related to adopted emergency response plans or emergency evacuation plans would be similar to those described for the proposed Project and would remain *insignificant*. Additionally, the Sustainable Communities Strategy Alternative would not substantially expose people or structures to significant post-wildfire risks. Impacts would be similar to those described for the proposed Project and would remain *insignificant*.

Conclusion and Relationship to Project Objectives

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented but with fewer sites for consideration for rezoning. This alternative would eliminate Rezone Site No. 1 (Giorgi) in the South Patterson Agricultural Area, Rezone Site No. 10 (McCloskey Lelande) in the San Marcos Agricultural Area, and Rezone Site No. 17 (Montessori), which is also located within the Eastern Goleta Valley. Additionally, this alternative would eliminate Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in Orcutt. In addition to the removal of these sites from the Potential Rezone Program, this alternative modifies the potential residential zoning district for Key Site 16, from DR-30/40 under the proposed Project to DR-20/30, thereby reducing the capacity of the site for additional housing. By doing so this alternative would accommodate the County's RHNA plus the 15 percent buffer for lower- to moderate-income units while reducing impacts to agricultural

resources, hazards and hazardous materials, land use and planning, noise, and utilities and water supply within the South Coast and Santa Maria Valley.

Table 4-19. Reduced Project C Alternative – Comparison to Project Objectives

Project Objective	Ability for Alternative to Achieve Objective
1. Rezone sites to accommodate the County's state-mandated 6th Cycle RHNA (5,644 units) plus a 15 percent buffer for the lower- and moderate-income categories (576 units), which total 6,240 units.	This alternative would reduce the total amount of potential development as compared to the proposed Project but would continue to accommodate the County's state-mandated 6th Cycle RHNA plus a 15 percent buffer for the lower- and moderate-income categories.
2. Promote housing development on infill sites and maximize housing capacity by rezoning at higher densities to facilitate multifamily housing to accommodate housing for lower- and moderate-income households.	This alternative would remove three sites within the Eastern Goleta Valley and two sites within the community of Orcutt. Even with the removal of these sites in the Urban Area, this alternative would continue to promote housing development on infill sites. Housing capacity would continue to be maximized by rezoning at higher densities; however, the number of sites considered for potential rezoning would be reduced.
3. Promote a jobs-to-housing balance countywide by facilitating the development of sufficient and affordable housing in close proximity to job centers and essential community services.	This alternative would eliminate five potential rezone sites within the South Coast and Santa Maria Valley. Nevertheless, this alternative would achieve the objective of promoting a jobs-to-housing balance countywide, though to a lesser extent than the proposed Project.
4. Encourage diverse housing types that meet the requirements of special needs households.	This alternative would enable a slight reduction in residential and mixed use development as compared to the proposed Project but would encourage diverse housing types that meet the requirements of special needs households.
5. Promote equal housing opportunities and locational choices for all persons in all housing types.	The elimination of sites from consideration that are located in the South Coast and Santa Maria Valley would not substantially reduce the diversity and locational choices of housing as compared to the proposed Project
6. Promote and support fair housing choice and fair housing public outreach programs.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to promote and support fair housing choice and fair housing public outreach programs.
7. Collaborate with developers to improve and conserve affordable housing units and provide gap financing for affordable units.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to promote collaboration with developers to improve and conserve affordable housing units and provide gap financing for affordable units.

Table 4-19. Reduced Project C Alternative – Comparison to Project Objectives (Continued)

Project Objective	Ability for Alternative to Achieve Objective
8. Reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to reduce or eliminate governmental constraints to the maintenance, improvement, and development of housing for all income levels, where feasible.
9. Prioritize housing for people who live and/or work within Santa Barbara County.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley but would continue to prioritize housing for people who live and/or work within Santa Barbara County.
10. Ensure new housing sites have adequate infrastructure and do not face significant environmental constraints.	This alternative would eliminate sites from consideration that are located in the South Coast and Santa Maria Valley and would reduce potential constraints on existing infrastructure within the Eastern Goleta Valley and the community of Orcutt.

4.6 Identification of Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment. The Lead Agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible (CEQA Guidelines Section 15126.6[a], [c] and [f]). In many cases, the No Project alternative would have the fewest or least intense impacts. However, the CEQA Guidelines Section 15126.6(e)(2) states that "[i]f the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

For the implementation of a planning and policy document such as the Housing Element Update, there may not be a clear Environmentally Superior Alternative. Selection of the Environmentally Superior Alternative may be difficult, especially when the differences between the impacts of the alternatives involve trade-offs between types of impacts. An alternative may reduce environmental impacts to certain resource areas and increase impacts to other resource areas as compared to the proposed Project, while another alternative may reduce different environmental impacts. Although CEQA does not provide specific guidance in this matter, where an alternative is anticipated to result in reduced impacts for a majority of resource areas and/or substantially reduced impacts in especially critical resource areas, this can support a finding that the alternative is environmentally superior. In such instances, the EIR may disclose the differences between the alternatives and identify how each alternative may be superior. The Lead Agency retains the authority to identify the Environmentally Superior Alternative based on the evidence in the EIR, agency and public input, Lead Agency standards and policies, and the Lead Agency's independent decision-making.

Table 4-20 summarizes the environmental impact findings for each alternative analyzed in the section relative to the proposed Project. This assessment considers the overall advantages and disadvantages associated with the analyzed alternatives relative to the Housing Element Update. With the exception of the No Project Alternative, the alternatives have similar reductions in the relative severity of impacts to resource areas including resource areas with significant and unavoidable findings. ~~In evaluating alternatives under CEQA, different weights may be assigned to the relative importance of specific environmental impacts. In~~ Therefore, to select the Environmentally Superior Alternative, ~~comparing the alternatives to the proposed Project,~~ the County tallied the number of resource areas that would result in "substantially less adverse" impacts to significant and unavoidable impacts compared to the proposed Project for each alternative. The County also considered the overall reduction in "substantially less adverse" impacts to all resources regardless of their impact level. ~~"more weight" was given to agricultural resources, biological resources, GHGs, hazards and hazardous materials (i.e., airport safety), land use and planning, noise, transportation, utilities and water supply, and wildfire hazards than to other resource area impacts, primarily considering the importance of these issue areas to have the most significant and irreversible impacts and the County's overall policy context for the management of these resources.~~

In addition to resource areas assessed in Table 4-20, additional importance must be placed on how and to what extent each of the alternatives accomplishes the goals and objectives of the proposed Project (refer to Section 4.2, *Project Goals and Objectives*). The project objective to "meet the state-mandated 6th Cycle RHNA for the County," was given particular importance because not doing so could have potentially serious consequences for the County, including limited access to state funding as well as potential for lawsuits. When a jurisdiction's Housing Element is found to be out of compliance, its general plan is at risk of being deemed inadequate, and therefore invalid. If a jurisdiction is sued over an inadequate general plan, the court may impose requirements for land use decisions until the jurisdiction brings its general plan – including its Housing Element – into compliance with state housing law.

Under the No Project Alternative, the Housing Element Update would not be implemented by the County. This alternative would continue to allow new residential development under the existing applicable County policy framework. However, without implementation of the Housing Element Update, the No Project Alternative would not generate affordable housing production needed in the unincorporated county. For example, as described in Section 2.3.2, *Project Components,* the County increased its 2023-2031 RHNA for the lower- and moderate-income affordability levels by 15 percent, as recommended by the state, and is planning for minimum development of up to 6,240 units. While the No Project Alternative's potential buildout of 7,125 units would exceed this level of residential development, without the implementation of the Housing Element Update, it is likely that the residential development enabled under existing zoning regulations would not achieve the state-mandated lower- and moderate-income affordability targets. Further, the majority of residential development under the No Project Alternative would occur within the North County, and residential development on the South Coast would fall short of the County's RHNA for the South Coast.

Table 4-20. Comparison of Project Impacts by Alternative

Resource Area	Proposed Project	Alternative 1 – No Project Alternative	Alternative 2 – Sustainable Communities Strategy Alternative	Alternative 3 – Reduced Project A	Alternative 4 – Reduced Project B	Alternative 5 – Reduced Project C
Aesthetics and Visual Resources	Significant and Unavoidable	Substantially Less Adverse	Less Adverse	Substantially Less Adverse	Substantially Less Adverse	Less Adverse
Agricultural Resources	Significant and Unavoidable	Substantially Less Adverse	Substantially Less Adverse	Substantially Less Adverse	Substantially Less Adverse	Less Adverse
Air Quality	Significant and Unavoidable	Substantially Less Adverse	Less Adverse	Less Adverse	Less Adverse	Less Adverse
Biological Resources	Significant and Unavoidable	Substantially Less Adverse	Similar	Similar	Similar	Similar
Cultural and Tribal Cultural Resources	Potentially Significant but Mitigable	Less Adverse	Similar	Similar	Similar	Similar
Energy	Insignificant	Substantially Less Adverse	Similar	Less Adverse	Less Adverse	Less Adverse
Greenhouse Gas Emissions	Insignificant	Less Adverse	Less Adverse	Less Adverse	Less Adverse	Less Adverse
Hazards and Hazardous Materials	Potentially Significant but Mitigable	Substantially Less Adverse	Similar	Substantially Less Adverse	Less Adverse	Less Adverse
Hydrology and Water Quality	Significant and Unavoidable	Substantially Less Adverse	Substantially Less Adverse	Less Adverse	Less Adverse	Less Adverse
Land Use and Planning	Significant and Unavoidable	Substantially More Adverse	Less Adverse	Similar	Similar	Similar
Noise	Potentially Significant but Mitigable	Substantially Less Adverse	More Adverse	Substantially Less Adverse	Less Adverse	Less Adverse

Table 4-20. Comparison of Project Impacts by Alternative (Continued)

Resource Area	Proposed Project	Alternative 1 – No Project Alternative	Alternative 2 – Sustainable Communities Strategy Alternative	Alternative 3 – Reduced Project A	Alternative 4 – Reduced Project B	Alternative 5 – Reduced Project C
Population and Housing	Significant and Unavoidable	Less Adverse / Less Beneficial	Similar	Less Adverse	Similar	Similar
Public Services and Recreation	Significant and Unavoidable	Less Adverse	More Adverse	Less Adverse	Less adverse	Less Adverse
Transportation	Significant and Unavoidable	Less Adverse	Less Adverse	More Adverse	More Adverse	More Adverse
Utilities and Water Supply	Significant and Unavoidable	Substantially Less Adverse	Less Adverse	Substantially Less Adverse	Less Adverse	Less Adverse
Wildfire	Significant and Unavoidable	Substantially Less Adverse	Substantially Less Adverse	Similar	Less Adverse	Less Adverse
Project Objectives Met	Yes	No	Yes, but to a Lesser Extent	Yes, but to a Lesser Extent	Yes, but to a Lesser Extent	Yes, but to a Lesser Extent
Reduce Significant and Unavoidable Impacts?	--	Yes	Partially	Partially	Partially	Partially

The Sustainable Communities Strategy Alternative would concentrate new high-density and affordable housing development in a designated HQTC and near existing services, including transit and active transportation facilities. This would target housing opportunities, especially higher-density, multifamily, affordable housing, in existing urban communities in the South Coast and Santa Maria Valley, which are the most VMT-efficient regions in the county. In contrast to the proposed Project, the Sustainable Communities Strategy Alternative would consolidate housing away from regions that are not VMT-efficient, do not provide as many jobs or services, and exhibit greater constraints to development (e.g., natural resources, utilities, infrastructure, wildfire hazards). In the South Coast, the maximum housing growth estimated in the potential rezone sites would occur within the transit priorities areas adjacent to the Hollister Avenue HTQC. Relocating the housing growth in the rezone sites to be closer to transit reduces the South Coast total VMT by 5 percent and the total VMT per service population by 4 percent in comparison to the proposed Project. Given that 41 percent of the total VMT in the unincorporated county is generated in the South Coast, this reduction in total VMT results in an overall reduction in countywide VMT with both total VMT and total VMT per service population decreasing by 1 percent in comparison to the proposed Project. However, in the Santa Maria Valley, the additional housing growth under this alternative increases the total VMT by 16 percent and the total VMT per service population by 7 percent in comparison to the proposed Project. While the total VMT per service population in the Santa Maria Valley is still less than the county baseline VMT, the total VMT per service population in the Santa Maria Valley is actually higher than under Future No Project Conditions. The additional housing growth in the Santa Maria Valley in the Sustainable Communities Alternative effectively reduces the jobs-to-housing ratio from 0.88 under the Future No Project Scenario to 0.58 under this alternative resulting in longer commutes for the additional residents living in the Santa Maria Valley. The number of vehicles traveling from the Santa Maria Valley to the South Coast increases under the Sustainable Communities Strategy Alternative (8 percent of vehicle trips in comparison to 6 percent in the Project) which increases overall VMT due to the long distance (approximately 65 miles) between these communities. This alternative would attain most Project Objectives by focusing new housing in urban infill in existing communities that are in proximity to services, which would also support key regional goals and policies related to improving the jobs-to-housing balance, reducing VMT and associated mobile-source air quality and GHG emissions, and encouraging transit-oriented communities. As described in Table 4-20, this alternative would also have the potential to result in greater impacts related to the increased potential airport safety hazards and conflicts with the ALUCPs for the Santa Barbara Municipal Airport and Santa Maria Airport, as well as potential policy inconsistencies in the Urban Area due to greater site development, building heights, and visual incompatibility. However, the Sustainable Communities Strategy Alternative would substantially reduce impacts on agricultural resources, hydrology and water quality (Goleta Groundwater and Santa Maria River Valley basins), and wildfire and incrementally reduce impacts on other resource areas including aesthetics and visual resources (in the Rural Area), air quality (operational), GHG emissions, land use and planning, transportation, and utilities and water supply.

The Reduced Project A Alternative would eliminate Rezone Site Nos. 2 through 7 in the South Patterson Agricultural Area of the South Coast and three sites within Orcutt in the Santa Maria Valley. By doing so this alternative would accommodate the County's RHNA plus the 15 percent buffer for lower- to moderate-income units, while substantially reducing impacts to aesthetics and visual resources, agricultural resources, hazards and hazardous materials (ALUCP Safety Zones), noise (operational roadway noise and airport noise compatibility), and utilities and water supply (solid waste). This alternative would also result in incremental reductions in impacts to other resource areas

including air quality (operational), energy, GHG emissions, groundwater (Goleta Groundwater and Santa Maria River Valley basins), population and housing, and public services and recreation.

Under the Reduced Project B Alternative, the same components of the Housing Element Update would be implemented but with fewer sites considered for rezoning. This alternative would eliminate Rezone Site Nos. 2 through No. 4 in the South Patterson Agricultural Area and Rezone Site 11 (Glen Annie) in the South Coast, as well as three sites within the community of Orcutt in the Santa Maria Valley. By doing so this alternative would accommodate the County's RHNA plus the 15 percent buffer for lower- to moderate-income units, while substantially reducing impacts on aesthetics and visual resources and agricultural resources. This alternative would also result in incremental reductions in impacts to other resource areas including air quality (operational), energy, GHG emissions, hazards and hazardous materials, groundwater (Goleta Groundwater and Santa Maria River Valley basins), noise (airport noise compatibility), population and housing, public services and recreation, utilities and water supply, and wildfire.

Under the Reduced Project C Alternative, the same components of the Housing Element Update would be implemented but with fewer sites for consideration for rezoning. This alternative would eliminate Rezone Site No. 1 (Giorgi) in the South Patterson Agricultural Area, Rezone Site No. 10 (McCloskey Lelande) in the San Marcos Agricultural Area, and Rezone Site No. 17 (Montessori), which is also located within the Eastern Goleta Valley. Additionally, this alternative would eliminate Rezone Site No. 21 (Key Site 10) and No. 22 (Key Site 11) in the community of Orcutt. By doing so this alternative would accommodate the County's RHNA plus the 15 percent buffer for lower- to moderate-income units, incrementally reducing impacts on other resource areas including aesthetics and visual resources, agricultural resources, air quality (operational), energy, GHG emissions, hazards and hazardous materials, groundwater (Goleta Groundwater and Santa Maria River Valley basins), land use, and planning, noise (airport noise compatibility), population and housing, public services and recreation, utilities and water supply, and wildfire.

While the No Project Alternative would reduce impacts to a greater degree ~~than~~ compared to all the other alternatives, the No Project Alternative is not feasible under state housing and general plan law and would not achieve the Project Objectives, including planning for the 6th Cycle RHNA. CEQA also requires consideration of another alternative if the No Project Alternative is potentially the environmentally superior alternative.

Reduced Project A Alternative reduces adverse impacts to the proposed Project's 16 resource areas, including the 11 significant and unavoidable impacts, to the greatest extent compared to the other three feasible alternatives (i.e., Sustainable Communities Strategy, Reduced Project B, and Reduced Project C). Therefore, Reduced Project A is the Environmentally Superior Alternative. As described above, the County tallied the number of resource areas that would result in "substantially less adverse" impacts for significant and unavoidable impacts and all impact areas (i.e., insignificant, significant but mitigable, and significant and unavoidable) compared to the proposed Project for each alternative and selected the alternative with the highest total. ~~When balancing the reductions in the severity of significant and unavoidable impacts with potential increases in significant and unavoidable impacts, the Reduced Project A Alternative has been selected as the environmentally superior alternative.~~ Reduced Project A Alternative results in substantially less adverse impacts compared to the proposed Project to five resource areas - aesthetic and visual resources, agricultural resources, hazards and hazardous materials, noise, and utilities and water supply. Of these resource areas, three are significant and unavoidable – aesthetics and visual resources, agricultural resources, and utilities and water supply. Nonetheless, the impacts to the 11 significant and unavoidable impacts

while reduced under Reduced Project A for several resource areas remain significant and unavoidable. With the exception of the No Project Alternative, none of the alternatives reduced significant impacts to an insignificant level, and in most cases, the reduction in impacts was largely due to the reduced scope of the alternatives compared to the maximum buildout scenario that was analyzed under the proposed project. ~~As with the Reduced Project B and C alternatives, this alternative would result in fewer potential rezones and corresponding reductions in potential impacts on air quality, energy, and GHG emissions due to a reduction in operational emissions. Additionally, as with the Reduced Project B and C alternatives, Alternative A would reduce potential impacts related to population and housing and public services and recreation due to a reduction in population as compared to the proposed Project. However, the Reduced Project A Alternative also eliminates the potential rezone sites within the South Patterson Agricultural Area, which would preserve urban agriculture, substantially reduce potential impacts related to airport safety zones, and substantially reduce potential impacts related to airport noise compared to the proposed Project and to a greater degree than the other alternatives.~~ When taken together and compared against the other alternatives considered for analysis, the Reduced Project A Alternative makes the most sizeable reduction in physical environmental impacts and, therefore, would be the environmentally superior alternative to the proposed Project.

Chapter 5
Other CEQA Considerations

This section presents the evaluation of additional considerations required by the California Environmental Quality Act (CEQA) that are not covered within the other sections of this Program Environmental Impact Report (EIR) for the 2023-2031 Housing Element Update (Housing Element Update; Project). CEQA Guidelines Section 15126 requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Accordingly, in addition to the analysis provided in Chapter 3, *Environmental Impact Analysis*, this Program EIR must identify growth-inducing impacts and significant irreversible environmental changes that would potentially result from the proposed Project. Accordingly, other CEQA considerations include: 1) significant and unavoidable environmental effects of the proposed Project; 2) reasons why the Housing Element Update is being proposed notwithstanding its significant and unavoidable impacts; 3) significant irreversible environmental changes; 4) growth-inducing impacts (including removal of obstacles to growth); and 5) resource areas that are found not to be significant.

5.1 Significant Unavoidable Environmental Effects

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Where there are significant impacts, their implications, and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Based on the analysis presented in this Program EIR, the proposed Project would create significant and unavoidable impacts on:

- Aesthetics and visual resources;
- Agricultural resources;
- Air quality;
- Biological resources;
- Hydrology and water quality;
- Land use planning consistency;
- Population and housing;
- Public services and recreation;
- Transportation, including related vehicle miles traveled (VMT);
- Utilities and water supply; and
- Wildfire.

(Refer to Section 3.1, *Aesthetics and Visual Resources,* Section 3.2, *Agricultural Resources,* Section 3.3, *Air Quality,* Section 3.4, *Biological Resources,* Section 3.9, *Hydrology and Water Quality,* Section 3.10,

Land Use and Planning, Section 3.12, *Population and Housing,* Section 3.13, *Public Services and Recreation,* Section 3.14, *Transportation,* Section 3.15, *Utilities and Water Supply,* and Section 3.16, *Wildfire* for a complete description of significant and unavoidable impacts to these environmental issue areas.)

Under CEQA Guidelines Section 15065(c)(4), when an EIR demonstrates that a proposed project will cause significant and unavoidable impacts that cannot be fully mitigated, the agency must issue a Statement of Overriding Considerations before approving the proposed project. Under CEQA Guidelines Section 15093, a Statement of Overriding Considerations is a report of the lead agency's findings regarding the merits of approving a proposed project despite its significant environmental impacts and reflects the balancing of competing public objectives. Therefore, the County would be required to adopt a Statement of Overriding Considerations to address the significant impacts identified above and discussed in detail in Chapter 3, *Environmental Impact Analysis.* In this instance, the County may weigh the long-term benefits of the proposed Project, such as enhancing the affordability, diversity, quantity, and quality of the housing supply, promoting, encouraging, and facilitating housing for special needs groups, preserving the affordable housing stock, and helping to overall address the local housing crisis. To facilitate consideration of these issues, this Program EIR discloses potential impacts and provides a range of alternatives to the proposed Project that could more fully alleviate environmental concerns. In addition, Section 3.10, *Land Use and Planning,* provides an overview of the County's policy context, which provides information on how the proposed Project meets several important County policy objectives and where it may raise concerns over consistency with other County policies. All this information should be reviewed when considering the proposed Project.

5.2 Reasons the Project is Being Proposed Notwithstanding its Significant and Unavoidable Impacts

In addition to the identification of a project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(c) requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with the project.

As previously described in Chapter 1, *Introduction* and Chapter 2, *Project Description*, the Housing Element is one of seven state-mandated general plan elements. Among other requirements, the Housing Element must identify, analyze, and make adequate provision for the existing and projected housing needs of all economic segments of the community. California Government Code Sections 65580-65589.8 requires that communities prepare and update the Housing Element every eight years. In February 2023, the County's previous housing cycle concluded. With the previous eight-year cycle concluded, the County must now plan for the next eight-year cycle (2023-2031). The Housing Element Update would serve as the County's housing plan for the 2023-2031 planning period, setting clear goals, policies, and programs to meet state requirements by providing for the housing needs of all segments of the population while affirmatively furthering fair housing and preventing the displacement of existing residents. As required by state law, the Housing Element Update must be adopted locally and certified by the California Department of Housing and Community Development (State HCD). If the State HCD determines that a Housing Element fails to substantially comply with the state housing law, there are potentially serious consequences including limited access to state

funding, as well as potential for lawsuits. When a jurisdiction's Housing Element is found to be out of compliance, its general plan is at risk of being deemed inadequate, and therefore invalid. If a jurisdiction is sued over an inadequate general plan, the court may impose requirements for land use decisions until the jurisdiction brings its general plan – including its Housing Element – into compliance with state housing law.

5.3 Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(d) requires a discussion of:

> "*…significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified*."

Analysis of environmental impacts of the proposed Project considers effects on the environment from future uses and related development enabled under the proposed Project. Ongoing development of vacant sites currently zoned for residential uses would utilize existing infrastructure and would involve small-scale (i.e., single-family units) development on existing lots. However, the development of potential County-owned sites, pending projects, and potential rezone sites included in the sites inventory would require substantial development and redevelopment within existing communities, including the development of public infrastructure and irreversible alteration of the built environment. As such, the uses and related development described for the proposed Project would entail the commitment of non-renewable energy resources; human resources; and small amounts of other resources such as sand and gravel, asphalt, steel, copper, lead, other metals, and water resources, most of which are non-renewable or locally limited resources. Resources that would be permanently and continually consumed during the life of the proposed Project include electricity, natural gas, transportation fuels, and miscellaneous materials to be used as supplies for certain uses. However, the amount and rate of consumption of these resources would not result in the inefficient or wasteful use of resources, as further described in Section 3.6, *Energy*. Compliance with all state and local regulations, development standards, and applicable building codes would ensure that natural resources are conserved to the maximum extent feasible. While future construction and operational activities anticipated to occur under the proposed Project would result in the irretrievable commitment of non-renewable energy resources (primarily in the form of fossil fuels, including fuel oil, natural gas, and gasoline for automobiles and construction equipment), consumption of such resources is associated with any development in the region and is not unique or unusual to the proposed Project. Additionally, new technologies or systems may emerge in the future, or become more cost-effective or user-friendly, to further reduce the reliance on nonrenewable natural resources such as solar photovoltaic energy and other renewable energy sources.

The proposed Project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment. The proposed Project primarily involves the development of residential and mixed use projects, which do not generate substantial hazardous materials. While construction for new development, as well as some uses under

the proposed Project – such as new commercial development – would result in the limited use, transport, storage, and disposal of common hazardous materials, all activities would comply with applicable federal and state laws related to hazardous materials transport, use, and storage, which would significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage. (See Section 3.8, *Hazards and Hazardous Materials,* for a more detailed discussion of these issues.) Overall, since the proposed Project does not involve substantial environmental hazards or unreasonably consume non-renewable resources, the irreversible environmental changes that would result from the implementation of the proposed Project would be *insignificant*.

5.4 Growth-Inducing Impact Analysis

CEQA Guidelines Section 15126.2(e) requires a discussion of ways in which a project could foster economic or population growth, including ways in which a project could remove an obstacle to growth that could result in potentially significant irreversible changes. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. A project may induce growth if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to population growth, taxes community service facilities to the extent that the construction of new facilities would be necessary, or encourages or facilitates other activities that cause significant environmental effects. In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project results in the urbanization of land in a remote location (leapfrog development);
- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area);
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval); or
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.).

If a project meets any one of these criteria, it may be considered growth-inducing. Generally, growth-inducing projects are in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encouraging premature or unplanned growth. However, in urban areas, growth-inducing projects typically involve proposed plans or policies that alleviate barriers to growth or increase development opportunities.

To comply with CEQA, an EIR must discuss how the project could promote economic or population growth near the project area and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[e]). Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth is considered a significant impact only if it affects – either directly or indirectly – the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

In accordance with County goals and state requirements, the Housing Element Update primarily identifies future housing sites within the existing urban areas and vacant infill development sites. As described in Chapter 2, *Project Description,* it is unknown precisely, which sites would be selected from the sites inventory by the County Board of Supervisors to achieve the County's Regional Housing Needs Allocation (RHNA). In the event that the County Board of Supervisors elects to select all sites from the sites inventory, it is possible that future housing element updates would be required to seek additional housing capacity outside the existing urban area, which would induce growth. Further, some potential rezone sites are located on vacant lands on the edges of the existing developed communities and/or involve the conversion of existing agricultural land to residential uses. For example, Rezone Site No. 11 (Glen Annie) would expand urban development and required infrastructure (e.g., water and sewer lines, local roads, electricity) into 94.7 acres of rural agricultural land in the foothills of the Santa Ynez Mountains in the South Coast. Additionally, the development of potential rezone sites in the South Patterson Agricultural Area could extend urban utilities and development into an existing urban agricultural area. These conversions of agricultural land would remove an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area) and establish a precedent-setting action (e.g., a change in zoning or general plan amendment approval). While these changes would occur to accommodate future growth that is projected to occur regardless of the proposed Project, rather than induce new growth, the loss of agricultural land and extension of urban services could increase pressure on adjacent lands to convert to urban uses as well, including the agricultural coastal mesa area of the South Patterson Agricultural Area or the foothills of Eastern Goleta Valley In the long term, if these potential rezone sites are selected as part of the implementation of the Housing Element Update, the proposed Project could have growth-inducing effects in areas directly adjacent to housing sites that involve agricultural conversion.

As described in Chapter 2, *Project Description,* and analyzed in Section 3.12, *Population and Housing*, the Housing Element Update would amend development standards and enact new programs to facilitate the production of housing, particularly affordable housing, as necessary to meet the County's RHNA. However, state law requires that the County provide the capacity and the regulatory framework to accommodate its RHNA "fair share" of the region's housing needs, which cannot be achieved without the proposed revisions to existing development standards and new programs to support housing. The Santa Barbara County Association of Governments (SBCAG) has also indicated that the RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth and address the existing needs so that they can grow in ways that enhance the quality of life, improve access to jobs, transportation, and housing, and not adversely impact the environment. In this regard, the Housing Element Update would not induce growth but rather would accommodate growth, particularly anticipated regional growth. The methodology to calculate the County's RHNA demonstrates this fact as it is based on a projected housing need using household growth for jurisdictions between the RHNA projection period between February 2023 and February 2031, in addition to a calculated future vacancy need and replacement need.

Additionally, SBCAG has noted that the South Coast Housing Market Area (HMA) is jobs-rich and housing-poor; this region's diverse mix of employment opportunities, coupled with an expensive housing market, drives workers to seek more affordable housing in areas such as the Lompoc Valley and Santa Maria Valley, as well as in adjacent counties. The production of new affordable housing, weighted towards the South Coast HMA, under the Housing Element would create new housing opportunities near existing job centers and improve the jobs-to-housing balance. Therefore, employees of the county may, in turn, become part of the county's residential population as well. In

this manner, the Housing Element Update would not induce growth but rather would accommodate the housing needs of the existing population.

The potential physical environmental impacts associated with the growth-inducing impacts of the Housing Element Update are further addressed in each resource area of this Program EIR. For instance, for impacts associated with potential increased pressure for future agricultural conversion, refer to Section 3.2, *Agricultural Resources.* For impacts associated with potential expansion of utility services, refer to Section 3.15, *Utilities and Water Supply.*

5.5 Effects Found Not to be Significant

CEQA Guidelines Section 15128 requires a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and, therefore, were not discussed in detail in the EIR. For this Program EIR, issues related to mineral resources were found not to be significant as discussed below. Based on the scoping study prepared for the Housing Element Update (Appendix A), the County determined that the proposed Project would have *no impact* or *insignificant* impacts on the following resources:

Geology and Soils

The proposed Project would not have the potential for significant impacts associated with geology and soils. The county supports diverse geologic features, topography, and soils and is located in a seismically active region. Development resulting from the proposed Project has the potential to occur in places or in a manner that would result in the exposure of development and future residents to geologic risks or hazards. These can include risks associated with the direct disturbance of soils during construction and causing substantial soil erosion or loss of topsoil, or the location of future development in areas subject to existing geologic hazards, such as earthquakes, unstable soils, or expansive soils. However, numerous state and local regulations exist that would apply to all future residential and commercial development resulting from the Housing Element Update, which adequately addresses many of these hazards. For instance, all development would be subject to compliance with the geologic, seismic protection, and hillside policies of the County's Comprehensive Plan, the County's Grading Code (County Code, Chapter 14), the County Building Code (County Code, Chapter 10), the California Building Code, and the Alquist Priolo Earthquake Fault Zoning Act, among others, that regulation new development to reduce or prevent impacts associated with geologic hazards. For instance, pursuant to Chapter 14 of the County Code, applicants for a proposed use triggering the need for a grading or building permit for site improvements may be required to prepare and submit an engineering geology report and/or a geotechnical (soil) engineering report prepared by a licensed professional geologist or geotechnical engineer for review and approval by the County Building Official. However, where relevant depending on the specific type(s) of proposed use(s) and related development, the requirement for an engineering geology report and/or geotechnical (soil) engineering report may be waived at the discretion of the Building Official. The geotechnical report would identify design requirements for structures and foundations to maintain structural integrity during an earthquake to the maximum extent feasible. At the discretion of the Building Official, all recommendations and design features in the geotechnical report may be incorporated into plans prepared by the applicant. The proposed Project does not include any plans, policies, or programs that would modify these existing regulations or exempt future residential development from

mandatory compliance with these requirements. Therefore, the implementation of the proposed Project would have *insignificant* impacts related to geology and soils.

Further, the proposed Project would not have the potential for significant impacts associated with the direct or indirect destruction of a unique paleontological resource or site or unique geologic feature. None of the county's designated areas of special geologic interest appear to overlap with the Project area. Much of the land within the county and included in the sites inventory where new development may occur, particularly for vacant agricultural lands, is generally underlain by younger-age alluvial sediments and surficial deposits that are considered to have low paleontological sensitivity due to the displaced or disturbed characteristics of the sediments. Generally, geologic units of sufficient age to contain paleontological resources are located much deeper below surficial alluvial sediments and surface deposits. Urban areas, active agricultural lands, and existing development sites, such as those identified in the sites inventory, often include some elements of construction with shallow excavations that do not typically extend deep enough to encounter such resources. For active farmlands and ranches where significant disturbance of the soils has historically occurred or currently occurs due to use of the site, ripping or tilling of soil, vegetation clearance, etc., and where agricultural enterprise activities are proposed, the potential to encounter paleontological resources is considered even lower. Further, under the proposed Project, all proposed uses and related development would be subject to existing County codes, policies, and permit processes, including the County's Grading Code (County Code, Chapter 14), the County Building Code (County Code, Chapter 10), and the California Building Code, among others, that regulate new development and require detailed geologic and soil investigations for development in areas with possible soil or geologic problems, including areas identified by the County as areas of special geologic interest. Due to the very low potential for new development under the proposed Project to encounter paleontological or unique geologic resources and mandatory compliance with existing regulations, implementation of the proposed Project is not expected to result in the loss or disturbance of such resources and impacts would be *insignificant*.

Forestry

A large portion of the unincorporated Santa Barbara County consists of forest land as defined under the California Public Resources Code (PRC) Section 12220(g). These forest lands are located within the Los Padres National Forest (LPNF) and managed by the U.S. Forest Service. Timberland is defined by PRC Section 4526 as land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. The proposed Project would not have the potential for significant impacts associated with forestry resources. As described in Chapter 2, *Project Description*, the Housing Element Update involves the adoption and implementation of various goals, policies, and programs, including a sites inventory and Program 1 with its Potential Rezone Program, which serves to guide, incentivize, and facilitate the development of housing in a manner that addresses the housing needs in the county and helps alleviate the local housing crisis. The sites inventory does not include any sites zoned for or which support traditional forestry resources or timberlands designated for timber extraction and none of these aspects of the proposed Project would directly affect forestry resources in the county. As such, the proposed Project does not propose any actions that would substantially affect such resources within the county or surrounding region. Therefore, the proposed Project would have *no impact* on these resource areas.

Mineral Resources

As described in Chapter 2, *Project Description*, the County may identify select non-residential zoned sites or sites zoned for lower-density residential and rezone these sites for higher-density residential uses. Some of the sites identified in the sites inventory and considered for rezoning under Program 1 and the Potential Rezone Program include agriculture-zoned lands. Mining is allowed in these zones; Land Use and Development Code (LUDC) Section 35.82.160, *Reclamation and Surface Mining Permits* provides regulations for surface mining operations in the county, in compliance with the California Surface Mining and Reclamation Act (SMARA). However, none of the identified sites currently operate or are permitted for mineral resource extraction, and the majority of mineral resource sites in the county, particularly sand and gravel operations, coincide with areas designated for open space. Therefore, implementation of the proposed Project would not disrupt substantial mining operations and the proposed Project would have *no impact* related to mineral resources.

Chapter 6
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Chapter 7
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Chapter 8

Mitigation Monitoring and Reporting Program

8.1 Purpose

The following Mitigation Monitoring and Reporting Program (MMRP) provides a summary of each Mitigation Measure (MM) for the 2023-2031 Housing Element Update (Housing Element Update; Project) and the monitoring implementation responsibility for each measure. The MMRP for the proposed Project will be in place through all phases of the proposed Project.

8.2 Responsibilities

The California Environmental Quality Act (CEQA) requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with Project development.

CEQA Guidelines Section 15091(d) states:

> *"When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be enforceable through permit conditions, agreements, or other measures."*

The Final Program Environmental Impact Report (EIR) for the proposed Project includes mitigation measures to reduce the potential environmental effects associated with the implementation of the Housing Element Update. Following the County's certification of the Final Program EIR and approval of the CEQA Findings, including this MMRP, the approved Project would be monitored in the manner specified by this MMRP.

8.3 Monitoring Table

For each mitigation measure, Table 8-1 identifies: 1) the full text of the mitigation measure; 2) the plan requirements and timing, including the agency which oversees the action; and 3) the monitoring division, including the entity responsible for monitoring the action and verifying compliance.

Table 8-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
Aesthetics and Visual Resources		
MM AV-1: Objective Design Standards for Multiple Unit and Mixed Use Housing Projects. The County's objective design standards for multiple unit and mixed use housing projects shall apply to all multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law.	This measure shall apply to applicable projects immediately following certification of this EIR. The County shall amend its zoning ordinances to apply existing objective development standards to multifamily housing projects that are proposed on County-owned sites and/or that are subject to solely ministerial review and approval and/or objective standards according to state housing law. Any required amendments to the zoning ordinances shall be implemented before the issuance of grading or building permits for any new development proposing residential densities of 20 dwelling units per acre or more on sites identified in the Housing Element Update.	All objective design standards shall be included in the qualifying housing project's plans. County P&D compliance monitoring staff shall ensure compliance through a review of project plans.
Air Quality		
MM AQ-1: PM_{10} and Dust Control. The County shall require that applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law implement the following measures to minimize short-term PM_{10} fugitive dust emissions. • During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding SBCAPCD's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained	These control measures shall be noted on all grading and building plans. The contractor or builder shall provide County P&D monitoring staff and SBCAPCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to: • Assure all dust control requirements are complied with including those covering weekends and holidays.	County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption. • Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces. • Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems. • If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. • Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area by watering, OR using roll-compaction, OR revegetating, OR by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. • Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard. • The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent the transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to SBCAPCD before grading/building permit issuance and/or map clearance.	• Order increased water as necessary to prevent the transport of dust offsite. • Attend the pre-construction meeting. • The dust monitor shall be designated before the issuance of grading. The dust control components apply for the beginning of any grading or construction throughout all development activities until final inspection and until landscaping is successfully installed.	

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
MM AQ-2: Equipment Exhaust. The County shall require that applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law implement the following measures to minimize short-term construction equipment exhaust emissions to the maximum extent feasible. • Diesel equipment meeting the CARB Tier 4or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible. • On-road heavy equipment with model year 2010 engines or newer should be used to the maximum extent feasible. • Diesel-powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible. • Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, should be used onsite where feasible. • Catalytic converters shall be installed on gasoline-powered equipment, if feasible. • All construction equipment shall be maintained per the manufacturer's specifications. • The engine size of construction equipment shall be the minimum practical size. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction worker trips should be minimized by requiring carpooling and by providing lunch onsite. • Construction truck trips should be scheduled during non-peak hours to reduce peak-hour emissions whenever feasible. • Proposed truck routes should minimize to the maximum extent feasible impacts to residential communities and sensitive receptors. • Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intake of buildings, air conditioners, and windows.	These control measures shall be noted on all grading and building plans.	County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
MM AQ-3: Project Screening and Project-Specific Air Quality Evaluation. Project applicants proposing projects that exceed the screening table established in SBCAPCD's most recently available *Scope and Content of Air Quality Sections in Environmental Documents*, or projects involving the development of a variety of land use categories (e.g., mixed use development projects) shall prepare and submit a technical assessment evaluating potential project operation-related air quality impacts to the County for review and approval. The evaluation shall be prepared in conformance with the County and SBCAPCD methodologies for assessing air quality impacts identified in the County's *Environmental Thresholds and Guidelines Manual* and SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents*. If operational emissions associated with proposed development exceed the County's and SBCAPCD's adopted thresholds of significance for either all source emissions or mobile-source only emissions, the County shall require applicants for new development to identify and incorporate mitigation measures to reduce operational air emissions below adopted thresholds. The technical assessment may account for additional requirements applicable to the proposed development, including VMT reduction strategies and transportation demand management measures, that would have the secondary effect of reducing mobile or other source emissions. Specific mitigation measures and their effectiveness in reducing emissions below significance shall be demonstrated as part of the technical assessment evaluation and approved by the County. Identified measures shall be included as part of the conditions of approval for the proposed development. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following: • Participation in the 3CE Prime Program which provides 100 percent renewably sourced electricity to customers. • Design new residential and commercial development to exceed Title 24 compliance requirements through the design of innovative measures, including incorporation of the following into project building plans: ○ 100 percent electrification of buildings. ○ Solar-ready development.	Applicants shall prepare and provide technical assessment evaluating operational air quality impacts, as well as demonstrate feasible mitigation measures to reduce impacts, consistent with County and SBCAPCD methodologies to the County for review and approval before issuance for grading or building permits. Mitigation shall be incorporated into the design and shall be noted on all grading and building plans before the issuance of grading permits. Implementation of measures shall be demonstrated before issuance of certificate(s) of occupancy.	County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
○ Utilize onsite renewable energy systems (e.g., solar, wind, geothermal, biomass, and/or bio-gas) to offset energy use. ○ Passive cooling strategies, passive cooling planned for or designed into structures (e.g., strategically sized overhands or trellis on the south side, operable skylights, fan, thermal chimney, a cupola or roof opening for hot air venting radiant barrier, or underground cooling tubes). ○ Residential lighting: whole-home, low voltage, lighting control system with conditional logic. ○ Non-residential lighting: For daylit spaces, use automatic, non-dimmed lighting control, automatic, continuous dimming of light sources, or integrated dimming daylight control. ○ Outdoor lighting designed for high efficiency, solar-powered, or controlled by motion detectors. ○ Natural lighting in buildings. ○ Building siting and orientation to reduce energy use and maximize opportunities for solar systems. ○ Summer shading and wind protection measures to increase energy efficiency (e.g., moveable exterior awnings or trees). ○ Protection of building from heat loss (e.g., planting a windbreak, earthen berm, or fin walls to create an air envelope around the building). ○ Use of landscaping to shade buildings and parking lots. • Provide and require the use of battery-powered or electric landscape maintenance equipment for new development. • Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). • Include design features to encourage alternate transportation modes. Examples include: ○ For pedestrians: such as sidewalks, safe streets and parking lot crossings, shade trees, off-street breezeways, alleys and over crossings, placement of parking lots and building entrances to favor pedestrians rather than cars, shower and locker facilities for employees.		

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
○ For transit riders: all of the above plus safe, sheltered transit stops with convenient access to building entrances. ○ For bicyclists: theft-proof and well-lighted bicycle storage facilities with convenient access to building entrances, on-site bikeways between buildings or uses; shower and locker facilities. ○ For carpools and vanpools: preferential parking. • Provide onsite services to reduce the need for offsite travel. Examples include: ○ For residential developments: include childcare, coworking spaces, neighborhood retail stores, postal machines, and automatic teller machines. ○ For mixed use projects involving commercial/office developments: include childcare, food service, postal machines, and banking services. • Provide onsite services to encourage alternative transportation modes, including, but not limited to, rideshare matching, transit subsidies, vanpool subsidies, shuttle services, parking management, guaranteed ride home, and education. • Schedule operations to reduce trips during highly congested periods, including, but not limited to, adjusted business hours, allow alternative work schedules, and schedule deliveries for off-peak hours. • Provide offsite transit services, bikeway, and pedestrian enhancements serving the project.		
MM AQ-4: Project Siting and Interior Air Quality Protection. Applicants of housing sites located within 500 feet of U.S. Highway 101, as measured from the road right-of-way boundary of U.S. Highway 101, located between the segment of U.S. Highway 101 between the junction of SR 154 and the junction of SR 217 shall site residential development outside of the 500-foot limits to the maximum extent feasible. Where development cannot feasibly be sited outside of the 500-foot limits, applicants shall be required to incorporate project design measures, which as an example could include any one or more of the following: • Installation of heating, ventilation, and air conditioning (HVAC) infrastructure within the building to circulate and purify outdoor air sources sufficiently to reduce diesel particulate matter and vehicle	These control measures shall be noted on all grading and building plans before the issuance of grading permits. Implementation of measures shall be demonstrated before issuance of certificate(s) of occupancy.	County P&D processing planner(s) shall ensure measures are on the project plan. County P&D grading and building permit inspectors shall spot-check. Grading and Building shall ensure compliance onsite.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
emissions. HVAC control systems shall include an air filtration system, such as the Lennox PureAir system, with particulate filters that have a minimum efficiency reporting value (MERV) of 12 for enhanced particulate removal efficiency capable of removing a significant portion of the sub-1.0 micrometer-sized particles expected from diesel combustion as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. • Avoidance of operable windows on the side of the building facing U.S. Highway 101. • Incorporation of dual-pane windows on all windows to make the building exterior as "airtight" as possible to minimize air infiltration. The exterior pressure envelope of the units should be sealed to achieve a tested air leakage rate of no more than 3.0 unit volumes per hour using the blower door ACH50 leak test, or equivalent. • Location of any vents and roof penetrations or other air intakes facing away from U.S. Highway 101 wherever possible. Doorways and entryways should also be located away from U.S. Highway 101 to the extent feasible. • Though not required, location of outdoor areas away from U.S. Highway 101 (e.g., behind thick vegetation screens or within the interior courtyard portions of the development). The applicant shall be responsible for demonstrating the effectiveness and feasibility of the proposed measures.		
Biological Resources		
MM BIO-1. Tree Protection Plan. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval a TPP. The TPP shall be prepared by an arborist/biologist approved by County P&D and shall determine whether mature native trees are located on the project site. If the biologist finds that there are no mature native trees at the project site, they shall submit a memorandum describing these findings to County P&D for review. If mature native trees are present, the TPP shall determine whether avoidance, minimization, or	The TPP shall be prepared by the applicant and submitted as part of project application materials. P&D shall review and confirm that all recommendations for the protection of mature native trees are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be	County P&D shall ensure that the TPP is included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
compensatory measures are necessary. The TPP shall include the following components: Site Plan Component: • All mature native trees shall be identified in the site plan. • All ground disturbance and development shall be sited to avoid mature native trees to the maximum extent practicable as determined by the arborist/biologist. • The location of all tree wells or retaining walls shall be located at least 6 feet from the dripline of all protected trees. • The location of all paths (i.e., driveways, sidewalks, etc.) shall be located at least 25 feet from dripline areas. Only pervious paving materials (e.g., gravel, brick without mortar, turf block) shall be located within 6 feet of dripline areas. Construction Component: • Fencing of all trees to be protected shall be located at least 6 feet outside the dripline with chain-link (or other material satisfactory to the County) fencing at least 3 feet high, staked to prevent any collapse, and with signs identifying the protection area placed in 15-foot intervals on the fencing. • Fencing/staking/signage shall be maintained throughout all grading and construction activities. • Equipment storage (including construction materials, equipment, fill soil, or rocks), and construction staging and parking areas shall be located outside of the protection area. • All trees located within 25 feet of buildings shall be protected from stucco and/or paint during construction. • No irrigation shall occur within 6 feet of the dripline of any protected tree. • The TPP shall require that the following activities shall be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat.	graphically depicted by the applicant on project plans and submitted to County P&D for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of mature native trees shall be printed on all building and grading plans.	place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved TPP.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
○ If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used • Grading shall be designed to avoid ponding and ensure proper drainage within the driplines of oak trees. <u>Tree Replacement Component</u>: • The replacement trees shall be a native species, planted at a 10:1 ratio for oak trees (15:1 for blue oaks or valley oaks), and a 2:1 ratio for other trees. The replanting location shall be shown on site plans. • Species shall be from locally obtained plans and seed stock. • The trees shall be gopher-fenced. • The trees shall be irrigated with drip irrigation on a timer until established. • The trees shall be weaned off of irrigation over a period of 2 to 3 years. • No permanent irrigation shall occur within the dripline of any tree. • If replacement trees cannot all be accommodated onsite, the licensee shall submit a plan for approval by the Planning and Development Department for replacement trees to be planted offsite. All new and replanted trees shall be protected from predation by wild and domestic animals and from human interference by the use of staked, chain link fencing, and gopher fencing during the maintenance period.		
MM BIO-2. Habitat Protection Plan. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval an HPP. The HPP shall be prepared by a biologist approved by County P&D. The HPP shall first determine the presence of sensitive biological resources at a project site, including special-status species and their habitats, ESH, Riparian Corridors, wetlands, and other sensitive natural communities. If the biologist finds that there are no potential sensitive biological resources at the project site, they shall submit a memorandum describing these findings to County P&D for review. If resources are present, the HPP shall determine whether avoidance, minimization, or compensatory measures are necessary. The HPP shall include the following components:	The HPP shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations for the protection of sensitive biological resources are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted by the applicant on project plans and submitted to County P&D for review	P&D shall ensure that the HPP is included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
• A description of the location and extent of driplines and sensitive root zones for all vegetation to be preserved, locations of sensitive habitats with a detailed description of allowed disturbance, and depictions of original and new locations for replanted species. • Depiction of approved development envelopes, equipment storage, construction staging, and parking areas. • If sensitive habitats, watercourses, or riparian habitats occur within the project site, to the maximum extent feasible as determined by the biologist, the HPP shall identify a 100-foot buffer for ground disturbance and vegetation removal. The area shall be fenced with a fencing type and in a location acceptable to County P&D. Depiction of the type and location of protective fencing or other barriers to be in place to protect the habitat areas. Protective fencing/staking/barriers shall be maintained throughout all grading and construction activities. • If a project site is located adjacent to sensitive habitats, watercourses, or riparian habitats, the project shall be landscaped with only native, non-invasive, or compatible species to the adjacent habitat. • No alteration to stream channels or banks shall be permitted until the applicant demonstrates receipt of all authorizations from USACE, Central Coast RWQCB, and/or CDFW for any planned alteration to stream channels or banks. • If any ground disturbances would occur during the nesting bird season (February – mid-September), the HPP shall include requirements for nesting bird surveys. Prior to any ground disturbing activity, surveys for active nests shall be conducted by a biologist approved by Count P&D following CDFW-approved protocols, no more than 10 days prior to the start of activities. The surveys shall be conducted around the entire project site to identify any nests that are present and to determine their status. Identified nests shall be continuously surveyed for the first 24 hours prior to any activities to establish a behavioral baseline. Once work commences, all nests shall be continuously monitored to detect any behavioral changes. If behavioral changes are observed, the work causing that change shall cease and CDFW shall be consulted for additional avoidance and minimization measures. A minimum no-disturbance buffer of 250 feet around active nests of bird species and a 500-foot no-disturbance buffer around the nests of	and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of sensitive biological resources shall be printed on all building and grading plans.	damage or removal occurred, that correction is completed as required by the approved HPP.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
raptors shall be maintained until the breeding season has ended, or until the biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Any variance from these buffers shall be supported by the biologist and CDFW shall be notified in advance of implementation of a no-disturbance buffer variance. • The HPP shall require that the following activities be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat. ○ If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used. • If it becomes necessary to disturb or remove any plants within the habitat area, or in the event of unexpected damage, specimens shall be boxed and replanted. If it is not feasible to replant, plants shall be replaced at a minimum using the standards of the County's Standard Habitat Restoration Plan. If replacement plants cannot all be accommodated onsite, a plan must be approved by County P&D for replacement plants to be planted off-site. • If it becomes necessary (as authorized by County P&D) to disturb or remove any plants within the habitat area, or in the event of unexpected damage, a biologist approved by County P&D shall direct the work. Where feasible, specimens shall be boxed and replanted. If a biologist approved by County P&D certifies that it is not feasible to replant, plants shall be replaced at a minimum using the standards of the County's standard Habitat Restoration Plan and under the direction of the biologist. If replacement plants cannot all be accommodated onsite, a plan must be approved by County P&D for replacement plants to be planted offsite. • Grading shall be designed to ensure that habitat areas have proper drainage during and after construction, per biologist recommendations.		
MM BIO-3. Wildlife Movement Plan. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject	The Wildlife Movement Plan shall be prepared by the applicant and	County P&D shall ensure that the Wildlife Movement Plan is

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval a Wildlife Movement Plan. The Wildlife Movement Plan shall be prepared by a biologist approved by County P&D. The Wildlife Movement Plan shall first determine whether the project site has the potential to support wildlife linkages. If the biologist finds that there are no potential wildlife corridors traversing the project site, they shall submit a memorandum describing these findings to County P&D for review. If wildlife corridors are identified, the Wildlife Movement Plan shall analyze proposed fencing in relation to the surrounding opportunities for wildlife movement/migration, identify the type, material, length, and design of proposed fencing, and shall propose non-disruptive, wildlife-friendly fencing, such as post and rail fencing, wire fencing, and/or high-tensile electric fencing, to allow passage by smaller animals and prevent movement in and out of the project sites by larger mammals, such as deer. The evaluation and Wildlife Movement Plan shall also identify project design features that would reduce potential impacts and maintain habitat and wildlife movement.	submitted as part of project application materials. County P&D shall review and confirm that all recommendations for the protection of wildlife corridors are reflected in project plans and permit requirements. All project design features and protection measures shall be graphically depicted by the applicant on project plans and submitted to County P&D for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of wildlife movement corridors shall be printed on all building and grading plans.	included as part of the project application and that all standards and requirements for protection are reflected in project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved Wildlife Movement Plan.
Cultural Resources		
MM CTCR-1: Historic Resource Preservation. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include a Phase I historic resources report if they involve major alteration or demolition of buildings, structures, objects, or places that are generally more than 50 years old and: 1) listed or eligible for listing in the CRHR; 2) included in the County's list of Historic Landmarks or Places of Historic Merit under County Code Chapter 18A, Section 18A-3, or; 3) determined by the County to be significant pursuant to criteria for listing on the CRHR (Public Resources Code Section 5024.1). The Phase I report shall include a historic resources inventory and significance evaluation. However, multifamily housing projects that involve minimal interior or exterior modifications to existing structures shall not be required to prepare historic resource reports. Such development may include, but not be limited to, those that do not alter major building features, such as minor roofing repairs with in-	The owner/applicant shall prepare and submit Phase I, Phase II, and/or Phase III historic resources reports as part of project application materials. P&D shall review and confirm that all recommendations for historic resource preservation are reflected in project plans and permit requirements. All historic resource preservation standards and requirements shall be printed on all building and grading plans.	The P&D compliance monitoring staff shall ensure compliance with Phase I, Phase II, and/or Phase III recommendations through approval of project plans, a site visit, and/or owner/applicant/contractor-provided photo documentation.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
kind materials and minor electrical and plumbing improvements that do not involve major changes to interior or exterior walls. If the Phase I report identifies potentially significant historic resources, the owner/applicant shall submit a Phase II report that assesses project impacts and formulates mitigation measures to avoid and preserve the resources through project design and preservation in place. The owner/applicant shall submit a Phase III historic resources report if it is not possible for the project to completely avoid and preserve significant historic resources through project design and preservation in place. The Phase III report shall document the mitigation measures that were carried out and include all related documentation. All required studies shall be prepared according to the requirements of the most current County of Santa Barbara *Environmental Thresholds and Guidelines Manual* (Chapter 8, Guidelines for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). As needed, the historic resource studies shall identify appropriate protection standards to incorporate into the project design, including but not limited to the following: 1. For projects that affect historic structures or buildings, the project shall preserve, restore, and/or renovate the affected historic structures or buildings consistent with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (36 CFR Part 68, 1995) and *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (U.S. Department of the Interior 2017). 2. Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation, or documentation similar to HABS/HAER, is required for any project that would alter or destroy all or a portion of any significant historic resource. 3. For projects that affect historic objects or places, the project shall avoid and preserve the affected historic resources through project design or redesign and preservation in place.		
MM CTCR-2: Archaeological Resource Protection. Applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or	The Phase I, Phase II, and/or Phase III archaeological resource investigations and reports shall be prepared by the	P&D shall ensure that the archaeological resource report(s) is included as part of

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
objective standards according to state housing law shall include any existing archaeological resource surveys or reports for the project site. If the project site has not been subject to an archaeological resource survey, or the prior survey does not satisfy the requirements of a Phase I investigation, the owner/applicant shall submit a Phase I archaeological resource report documenting any archaeological resources that adjoin or exist within the project site. If the Phase I report indicates that archaeological resources adjoin or exist within the project site, the project shall avoid and preserve the resources through project design and preservation in place, or the owner/applicant shall submit a Phase II archaeological report that evaluates the significance of the archaeological resources. If the Phase II archaeological report indicates that the archaeological resources are significant, the applicant shall expand the Phase II archaeological report to assess project impacts and formulate mitigation measures to avoid and preserve the resources through project design and preservation in place. If the Phase II archaeological investigation finds that the archaeological resources are significant and potential impacts cannot be avoided through project design and preservation in place, the applicant shall submit a Phase III archaeological report to carry out mitigation measures to recover, analyze, interpret, report, curate, and preserve archaeological data that would otherwise be lost due to unavoidable impacts to significant resources. All required studies shall be prepared according to the requirements of the most current County of Santa Barbara Environmental Thresholds and Guidelines Manual (Chapter 8, Guidelines for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). As needed, the archaeological resource studies shall identify appropriate protection standards to incorporate into the project design, including but not limited to the following: 1. In accordance with applicable cultural resource protection policies, development shall be located in areas on a lot that would avoid disturbance of known significant archaeological resources. 2. If significant archaeological resources are located within 60 meters (200 feet) of ground-disturbing activities, the archaeological site shall	owner/applicant and submitted as part of project application materials. P&D shall review and confirm that all recommendations for archaeological resource protection are reflected in project plans and permit requirements, and consistent with applicable cultural resource protection policies. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted by the owner/applicant on project plans and submitted to P&D for review and approval before issuance of final approvals or permits by the County. All archaeological resource protection standards and requirements shall be printed on all building and grading plans.	the project application and that all archaeological resource protection standards are reflected in project plans. The owner/applicant shall demonstrate to P&D compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved archaeological resource protection plan.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
be fenced and appropriately protected during grading and construction. 3. For any work conducted within or near a significant archaeological site, an approved archaeologist and Native American observer, as appropriate, shall monitor the site during grading and construction (including abandonment). 4. An educational workshop shall be conducted for construction workers before and during construction.		
MM CTRC-3: Stop Work at Encounter. For future residential and mixed use development resulting from the proposed Project and involving ground disturbance, the owner/applicant and/or their agents, representatives, or contractors shall stop or redirect work immediately in the event archaeological, historic, or tribal cultural resources are encountered during grading, construction, landscaping, or other construction-related activity. The owner/applicant shall immediately contact P&D. A P&D-approved archaeologist shall evaluate the significance of the find in compliance with the provisions of state law and the most current County of Santa Barbara *Environmental Thresholds and Guidelines Manual* (Chapter 8, Guidelines for Determining the Significance of and Impacts to Cultural Resources – Archaeological, Historic, and Tribal Cultural Resources, and Appendix B, Fieldwork and Reporting Guidelines for Cultural Resources). Appropriate mitigation to protect and preserve significant archaeological, historic, or tribal cultural resources encountered during construction shall be required and funded by the owner/applicant.	P&D shall confirm that this cultural resource protection standard shall be printed on all building and grading plans.	The P&D permit processing planner shall check plans before the issuance of a permit for the proposed uses and related development. P&D compliance monitoring staff shall spot-check in the field throughout grading and construction.
MM CTCR-4: Encountering Human Remains. For future residential and mixed use development resulting from the proposed Project and involving ground disturbance, if human remains are accidentally discovered or recognized during construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the most likely descendent of the deceased Native American, who shall help determine what course of action should be taken in dealing with the remains. Per PRC 5097.98, the landowner shall ensure that the	If human remains are discovered, construction activities shall stop immediately. The owner/applicant shall immediately contact P&D permit compliance staff, who would be responsible for contacting the County Coroner. These cultural resource protection standards shall be printed on all building and grading plans.	P&D permit compliance staff shall ensure that no further disturbance shall occur until the County Coroner has made all necessary findings as to origin and disposition pursuant to PRC Section 5097.98.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC Section 5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.		
Hazards and Hazardous Materials		
MM HAZ-1: Environmental Site Assessment. Applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall retain a qualified hazardous materials Environmental Professional to prepare a Phase I ESA. The Phase I ESA shall be prepared in accordance with ASTM Standard Practice E 1527-13 or the Standards and Practices for AAI, prior to any land acquisition, demolition, or construction activities. The Phase I ESA shall identify specific RECs, if present, which may require further sampling / remedial activities by a qualified hazardous materials Environmental Professional with Phase II / site characterization experience prior to land acquisition, demolition, and/or construction. The Environmental Professional shall identify proper remedial activities to be implemented by the applicant/owner, if necessary. Requirements and Timing: The applicant/owner shall submit the Phase I ESA as part of project application materials. County P&D shall review and confirm that all required remedial activities, if necessary, are reflected in project plans and permit requirements before the issuance of grading or building permits. Monitoring: County P&D compliance monitoring staff shall ensure compliance with remedial activities, if necessary, through approval of project plans, a site visit, and/or applicant/contractor-provided documentation.	The applicant/owner shall submit the Phase I ESA as part of project application materials. County P&D shall review and confirm that all required remedial activities, if necessary, are reflected in project plans and permit requirements before the issuance of grading or building permits.	County P&D compliance monitoring staff shall ensure compliance with remedial activities, if necessary, through approval of project plans, a site visit, and/or applicant/contractor-provided documentation.
MM HAZ-2. Incidental Discovery of Contamination. For future residential and mixed use development resulting from the proposed Project, in the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site,	If previously unknown or unidentified soil and/or groundwater contamination is discovered, construction activities would stop immediately. The applicant/owner shall immediately	County permit compliance staff shall ensure that no further disturbance shall occur until the contaminates are identified and a soil

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
construction activities in the immediate vicinity of the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer, or similarly qualified individual) shall conduct an investigation to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant could pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of the contamination, if any, appropriate agencies shall be notified. If needed, a Site Health and Safety Plan that meets OSHA and Cal/OSHA requirements shall be prepared and in place prior to the commencement of work in any contaminated area.	notify County permit compliance staff. The applicant/owner would be responsible for contacting appropriate agencies (e.g., SBCFD). This condition shall be printed on all building and grading plans.	management plan and/or remediation plan is prepared and implemented.
MM HAZ-3. Compliance with ALUCP Density and Open Land Requirements. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be consistent with the density, height, and open land requirements provided in the ALUCPs for airports in Santa Barbara County.	This measure shall apply to applicable projects immediately following certification of this EIR. Within two years following EIR certification, the County shall adopt the ALUCPs and amend the zoning ordinances to include reference to the density and open land requirements in the ALUCPs for residential development.	County P&D compliance monitoring staff shall ensure compliance through a review of project plans.
Hydrology and Water Resources		
MM HWR-1. Flood Hazard Development Standards. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall address onsite flood hazards to eliminate flood risks to life and property consistent with the Flood Control District's Standard Conditions of Project Plan Approval.	The Flood Control District shall apply the Standard Conditions of Project Plan Approval for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law prior to	County P&D compliance monitoring staff and Flood Control District Review shall ensure compliance through a review of project plans.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
	the issuance of grading or building permits.	
Land Use and Planning		
MM LU-1: Additional Allowed Uses in Design Residential (DR) Zoning. The County shall amend the zoning ordinances for the DR Zone District to allow the following uses as part of proposed projects on sites zoned DR: 1. Open Space a. All or a portion of required open space may be provided as public open space and developed as public parks, trails, or other public recreational facilities (e.g., sports fields or courts, playgrounds, picnic or BBQ areas, community center, pool/aquatic facility, gymnasium) to provide recreational opportunities for use by both the residents of the site and the public. In siting and designing public open space, the project shall consider the following: i. The need to protect public use areas historically used by the public such as beaches and trails; ii. The avoidance of siting of structures in hazardous areas or on steep slopes; iii. The protection of environmentally sensitive habitat areas and archaeological sites; and iv. The protection of scenic areas of the site. b. The County may require the applicant or Homeowner's Association to maintain all public open spaces and related facilities for a specified period after occupancy of the project or may require payment of an in-lieu fee if the County maintains the public open space and related facilities. If the applicant or Homeowner's Association is to maintain public open spaces, prior to the approval of any permits for construction, a bond or other approved financial security shall be posted guaranteeing maintenance. 2. Commercial Recreational Facilities and Neighborhood-Serving Commercial Uses a. Commercial recreational facilities and neighborhood-serving commercial uses (i.e., convenience store, café, corner store) may be allowed in higher-density (i.e., 20 du/ac or more) developments, provided that:	The County shall amend the zoning ordinances for the DR Zone District within 2 years following adoption of the proposed Project by the Board of Supervisors.	County P&D shall ensure future residential development projects with DR zoning address all applicable site design features and requirements listed in this mitigation measure.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
i. Such commercial recreational facilities are accessory to and compatible with the residential uses; ii. Such commercial uses are accessory to the residential use and limited to those serving such day-to-day needs of residents in the immediate area such as food, pharmacy, fuel, and other incidentals; iii. Such commercial uses shall be an integral part of the development and accessible via active transportation modes (i.e., walking, biking) within the development; and iv. Such commercial uses shall not, by reason of their construction, lighting, location, manner or timing of operation, parking arrangements, signs, or other characteristics have adverse effects on residential uses within or adjoining the development or create traffic congestion or hazards to vehicular or pedestrian traffic.		
Noise		
MM NOI-1: Construction Hours. For future residential and mixed use development resulting from the proposed Project, all construction activity, including equipment maintenance and site preparation, shall be limited to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday, or as otherwise specified in a community plan. No construction shall occur on weekends or state holidays. Non-noise-generating construction activities, such as interior plumbing, electrical, drywall, and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) are not subject to these restrictions.	P&D shall confirm that this construction hours standard shall be printed on all building and grading plans. The applicant/contractor shall post signage stating these restrictions at all construction site entries. Signs shall be posted before the commencement of construction and maintained throughout construction.	P&D's permit processing planner shall check plans to ensure this standard is required before the issuance of a permit for the development and pre-construction meeting. P&D compliance monitoring staff shall spot-check in the field throughout grading and construction.
MM NOI-2: Noise Study and Site-based Attenuation. Applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include a site-specific noise study that documents the existing noise conditions on site and recommends attenuation strategies and techniques to address sensitive receptors and achieve acceptable noise levels under County standards. An onsite noise study shall be performed by an acoustical	The required noise study shall be prepared by the applicant and submitted as part of project application materials. P&D shall review and confirm that all recommendations of the noise study are reflected in project plans and permit requirements. All requirements	P&D shall ensure that the noise study is included as part of the project application and that all recommendations of the noise study are reflected in project plans. The applicant shall demonstrate to P&D compliance monitoring staff

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
engineer. The noise study shall measure and report the existing ambient Average Day-Night (L_{dn} or CNEL) noise environment within the project site, including transportation noise sources and any transient or nuisance noise sources. Based on project details, the noise study shall identify and quantify the potential project-related noise sources from construction and operation. All noise control techniques and recommendations in this report shall be incorporated into the project design to reduce exterior noise to at or below 65 dBA and interior noise to at or below 45 dBA. Construction noise assessment shall consider both transient and continuous noise sources, including equipment used by each project phase. To address construction noise, the noise study shall: • Identify noise control measures to ensure construction noise that exceeds 65 dBA is contained within the project site and does not affect sensitive receptors in the project vicinity per County thresholds, including acoustical shielding, sound blankets, engine mufflers, and designated construction routes. • Identify and notify properties within 500 feet of the project site that will receive notification of proposed construction timelines and noise complaint procedures to minimize potential annoyance or nuisance complaints related to construction noise no less than 10 days before initiation of any grading and construction activity. Operational noise shall consider both stationary noise, including HVAC and utilities, and transportation noise, including permanent increases in roadway noise and periodic peak noise from trucks and other services, and airport noise. To address operational and transportation noise, the noise study shall: • Document that the proposed project is not within 1,000 feet of a highway or major roadway, 3,000 feet of a railroad, or 2 miles of an airport. If the project is within any of those distances, then either: o Provide documentation showing the ambient noise level in all areas of the project site would be at or below 65 dB L_{dn}, or o Provide documentation showing that there is an effective noise barrier or noise attenuating feature of the project that reduces the ambient noise level in all areas of the project site at or below 65 dB L_{dn}, or	shall be printed on all building and grading plans.	that all required construction noise noticing and attenuating techniques and activities are completed before ground disturbance. Building inspectors shall ensure that all noise control measures have been built or incorporated according to the approved plans. If an acoustical survey is required, P&D compliance monitoring staff will ensure that recommended onsite noise levels have been reached before the Final Building Inspection Clearance.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
Provide documentation showing the ambient noise level in areas of the project site that would contain sensitive receptors including residences and recreational areas at would be below 75 dB L_{dn} and identifying noise attenuation requirements that will bring the interior noise level to 45 dB L_{dn} and/or exterior noise level to 65 dB $L_{dn.}$ Including the feasibility of noise barriers, site design, building orientation, and other features to meet prescribed exterior noise standards. An analysis of the noise insulation effectiveness of the proposed construction shall be documented, showing that the building design and construction specifications are adequate to meet the prescribed interior noise standard.		
Transportation		
MM T-1. Site-based TDM. Applications for multifamily housing and mixed use housing projects shall implement site design strategies to reduce vehicle trips to and from the project site. Site-based TDM strategies may include but not be limited to VMT-reducing measures identified in the CAPCOA *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (December 2021). The following site-based TDM measures shall be integrated into project design and plans as feasible based on site and project conditions: • **Provide Pedestrian Network Improvements**. This measure requires developers to provide pedestrian connections from the project site to and between existing facilities, including existing pedestrian routes. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive for short-distance trips. This mode shift results in a reduction of up to 6.4 percent of VMT. • **Construct or Improve Bike Facilities**. This measure requires projects located adjacent to existing and planned improvements identified in the County ATP to construct or improve bicycle facilities (Class I, II, III, or IV), including providing connections where appropriate through the site to the existing bikeway network in the project vicinity. Providing bicycle infrastructure helps to improve biking conditions within an area. This encourages a mode shift on the roadway parallel to the bicycle facility from vehicles to bicycles, reducing VMT up to 0.8 percent.	The site-based TDM plan shall be prepared by the applicant and submitted as part of project application materials. County P&D and the Transportation Division shall review and confirm that all feasible site-based TDM measures are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans. The applicant shall estimate the effectiveness of the site-based TDM measures in reducing project VMT.	County P&D and the Transportation Division shall ensure that the site-based TDM plan is included as part of the project application and that all required measures are reflected in the project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that all required TDM measures are constructed onsite and offsite, as required. Building inspectors shall ensure that measures have been built or incorporated according to the approved plans.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
• **Provide Bike Parking**. This measure requires projects to provide short-term and long-term bicycle parking facilities. Parking can be provided in designated areas or added within rights-of-way. • **Implement a Homeowners' Association (HOA) Subsidized or Discounted Transit Program or other Ridesharing/Carpool and Education Program.** This measure requires projects located within one mile of a transit stop to provide subsidized, discounted, or free transit passes for residents within the project's HOA. Reducing the out-of-pocket cost of choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This program would also facilitate ridesharing and carpooling among the project's residents and educate residents about opportunities to use active transportation rather than drive a vehicle.		
MM T-2. Construction Traffic and Access Management Plan. Applications for housing projects shall prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic and Access Management Plan shall be designed to: • Prevent traffic impacts on the surrounding roadway network; and • Ensure safety for both those constructing the project and the surrounding community; and The Plan shall, at a minimum, include the following: • Designated haul routes; • Designated Alternate Pedestrian Access Routes, consistent with ADA and the Public Rights-of-Way Accessibility Guidelines; • Onsite staging, which would avoid residential streets to the maximum extent feasible; • Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction) to address circulation requirements and public safety; • Construction crew parking; and • Emergency access provisions including training for flagmen. Ongoing Requirements throughout construction:	The required plan shall be prepared by the applicant and submitted as part of project application materials. County P&D shall review and confirm that all recommendations of the project's noise study, as applicable, are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans. Prior to project implementation, the applicant shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, and media listing/notification), as well as provide a call line for complaints and concerns regarding construction traffic. The applicant shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, local police and fire departments, County Public Works Department, and County P&D)	County P&D shall ensure that the plan is included as part of the project application and that all recommendations are reflected in the project plans. The applicant shall demonstrate to County P&D compliance monitoring staff that all required construction noticing and reporting requirements are completed before ground disturbance. Building inspectors shall ensure that all measures have been incorporated according to the approved plans.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
• A detailed Construction Traffic Control Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. Such plans shall be reviewed and approved by the County Planning and Development Department, in coordination with the County Public Works Department, prior to issuance of a demolition, excavation, grading, or building permit and implemented in accordance with this approval. • Temporary alternative pedestrian access routes with basic accessible features shall be designated whenever an existing pedestrian access route is closed for construction. • Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself.	and all owners and residential and commercial tenants of property within a radius of 500 feet before project implementation. The applicant shall coordinate construction work with affected agencies in advance of the start of work. The applicant shall obtain approval from the County for any haul routes for earth, concrete, or construction materials and equipment hauling.	
MM T-3. Funding and Mitigation Fee Programs Update. The County shall update the funding and fee mitigation programs. • **Evaluate the County's ATP.** The County shall review and evaluate the County's ATP and/or previously adopted community plans for active transportation improvements that would directly serve the selected housing sites in the adopted Housing Element Update. These improvements shall become required mitigation for the proposed Project, where feasible. • **Update Funding and Mitigation Fee Programs**. The County shall update its CIP, TIPs, including Goleta and Orcutt, create TIPs for communities that require substantial transportation improvement planning and funding, and the County's Transportation Impact Mitigation Fees (Chapter 23C of the County Code). The Transportation Impact Mitigation Fees shall reflect the fair-share contribution of new housing development to capital improvements identified in the CIP, TIPs, and/or the ATP, that mitigate transportation impacts from the Housing Element Update.	The County shall complete MM T-3 within 2 years of the Housing Element Update adoption. All housing projects under the Housing Element Update shall pay fair-share mitigation fees in accordance with the adopted mitigation fee program.	The County P&D Department shall ensure that this measure is included in the annual budget and work program for the second fiscal year following the adoption of the Housing Element Update.
Utilities and Water Supply		
MM UWS-1. Infrastructure, Services, Utilities, and Related Facilities. Applications for multi-family housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review	Documentation from the appropriate public water and wastewater districts or agencies shall be obtained by the	County P&D shall review and confirm that adequate water supply and infrastructure and

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
and approval and/or objective standards according to state housing law shall be served by public water and wastewater (sewer) districts or agencies, if such service is available, consistent with the County's zoning ordinances, as well as the CFC and California Plumbing Code. The applicant shall provide documentation from the appropriate public water and wastewater districts or agencies demonstrating that adequate water and wastewater services are available to serve the project; this includes water supply, system pressure, and service infrastructure, as well as wastewater conveyance and treatment capacity. The documentation shall also identify any required service extensions or improvements that are required to adequately serve the project, such as sewer laterals and main connections adequately sized to convey project wastewater flows, or water mains designed and sized to provide adequate flows and pressure to serve the project's general water demands and fire flows (i.e., pumps), considering the proposed height of the project's buildings.	applicant and submitted as part of project application materials. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the future proposed project.	wastewater conveyance and treatment capacity are available to serve the project.
MM UWS-2. Source Reduction and Solid Waste Management Plan (SRSWMP). Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall include an SRSWMP describing proposals to reduce the amount of waste generated during construction and throughout the life of the project and enumerating the estimated reduction in solid waste disposed at each phase of project development and operation.	The plan shall include but not be limited to: • Operation Source Reduction: ○ A program to purchase materials that have recycled content for operation (e.g., office supplies) • Operation Solid Waste Reduction Examples: ○ An Applicant/owner-specified amount of square feet of space and/or bins for storage of recyclable materials within the project site OR within each unit. ○ Establish a recyclable material pickup area. ○ A green waste source reduction program, including the creation of lots and/or common composting areas, and the use	During operation, the Applicant/owner shall demonstrate to P&D compliance staff as required that solid waste management components are established and implemented. The Applicant/owner shall demonstrate to P&D compliance staff that all required components of the approved SRSWMP are in place as required prior to Final Building Clearance.

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
	of mulching mowers in all common open space lawns. ○ Implement a new curbside recycling program (may require the establishment of private pick-up depending on the availability of County-sponsored programs) or participate in an existing program to serve the new development. If P&D determines that a curbside recycling program cannot be implemented, and an alternative program is not online, then it will be the responsibility of the applicant/owner to contract with the Community Environmental Council or some other recycling service acceptable to P&D to implement a project-wide recycling program. ○ Implement a backyard composting yard waste reduction program. The Applicant/owner shall submit an SRSWMP to the P&D permit processing staff for review and include the recycling and composting areas on building plans, as applicable. Program components shall be implemented prior to Final Building Clearance and maintained throughout the life of the project.	

Table 8-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
Wildfire		
MM WF-1: Onsite Defensible Space Requirements. Applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall provide adequate defensible space onsite if the housing project is proposed within or adjacent to the High or Very High FHSZs and/or WUI areas and must comply with the SBCFD's Defensible Space Standards. No offsite clearing of sensitive native vegetation shall be permitted unless deemed necessary by SBCFD for public and/or firefighter safety.	SBCFD shall apply the Defensible Space Standards for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law and are located within or adjacent to the High or Very High FHSZs and/or WUI areas. Application and approval of the Defensible Space Standards to qualifying projects by SBCFD shall be required before the issuance of grading or building permits.	Applicable defensible space setback requirements shall be included in applicable project plans. County P&D compliance monitoring staff shall ensure compliance with project plans prior to Final Building Inspection Clearance.

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Chapter 9
Response to Comments

9.1 Introduction

The Final Program Environmental Impact Report (EIR) provides responses to all written comments received on the Draft Program EIR during the 51-day public review period, which began on December 20, 2023 and ended on February 9, 2024. During this time, the County hosted two public hearings to present the proposed Project and Draft Program EIR findings to the public and solicit comments. This included a hearing on January 17, 2024 at the County of Santa Barbara Planning & Development (P&D) conference room at 624 W. Foster Road, Santa Maria and a hearing on January 23, 2024 at the County Planning Commission Hearing Room at 105 E. Anapamu Street, Santa Barbara. Comments on the Draft Program EIR include issues raised by the public, agencies, and community groups that warrant clarification or correction of certain statements in the Draft Program EIR. None of the corrections and additions constitute significant new information or substantial changes to the Project Description as defined by California Environmental Quality Act (CEQA) Guidelines Section 15088.5.

9.2 Distribution of the Draft Program EIR

The Draft Program EIR was distributed to federal, state, regional, and local agencies, key stakeholders, interested parties, and neighborhood groups as well as the State Clearinghouse. A physical copy of the Draft Program EIR was made available at the County of Santa Barbara (County) South Coast P&D office at 123 E. Anapamu Street, Santa Barbara, as well as at the Santa Barbara Public Library and the Santa Maria Public Library. An electronic copy was made available online on the County's project website.

9.3 Comments on the Draft Program EIR

9.3.1 Introduction and Organization

Each comment letter has been assigned an abbreviation to indicate whether the comment was received from an agency, non-governmental organization, or individual, or provided as a verbal comment (e.g., agency comments have been abbreviated as "A", non-governmental organizations and community group comments have been abbreviated as "O"). The body of each comment letter has been separated into individual comments, which have been numbered. This results in a numbering system whereby the first comment in the first letter from an agency is depicted as Comment A.1-1, A.1-2, A.1-3, and so on. These numbered comments are included in their entirety, followed by the corresponding responses. Copies of the comment letters are included proceeding the responses to each comment letter. Table 9-1 presents a list of all persons or agencies who submitted written comments on the Draft EIR.

Table 9-1. List of Public Comments Received on the Draft EIR

Comment Set	Name of Commenter	Date Received	Response Location
Agencies			
A.1	California Department of Transportation (Caltrans), Aeronautics Program	February 9, 2024	9-16
A.2	City of Goleta	February 9, 2024	9-30
A.3	County Riding and Hiking Trails Advisory Commission (CRAHTAC)	February 9, 2024	9-57
Non-Governmental Organizations and Community Groups			
O.1	Carpinteria Valley Association	January 30, 2024	9-74
Individuals			
I.1	Suzanne Levine	December 20, 2023	9-81
I.2	Anonymous	December 20, 2023	9-82
I.3	Catherine Taylor	December 26, 2023	9-84
I.4	Dale Lauderdale	December 27, 2023	9-87
I.5	Anonymous	January 2, 2024	9-89
I.6	Philip	January 3, 2024	9-91
I.7	Delene Goodell Bliss	January 4, 2024	9-93
I.8	Elaine Abercrombie	January 4, 2024	9-95
I.9	Jim Kibbie	January 4, 2024	9-97
I.10	Pam Rice	January 4, 2024	9-99
I.11	Scott Singhass	January 4, 2024	9-102
I.12	Adrienne Schuele	January 4, 2024	9-105
I.13	William Beall	January 4, 2024	9-107
I.14	Linda Greene	January 5, 2024	9-109
I.15	Norah Dunbar	January 5, 2024	9-112
I.16	Salli Eve	January 5, 2024	9-115
I.17	Jacqui Page	January 8, 2024	9-117
I.18	Jacqui Page	January 8, 2024	9-119
I.19	Kathleen D. Sullivan	January 8, 2024	9-121
I.20	Jacqui Page	January 9, 2024	9-123
I.21	Ruston Clames	January 9, 2024	9-125
I.22	Elizabeth French	January 12, 2024	9-128
I.23	Michael Morrison	January 12, 2024	9-131
I.24	Janine Lambe	January 14, 2024	9-133
I.25	Tama Takahashi	January 14, 2024	9-136
I.26	Janine Lambe	January 15, 2024	9-138
I.27	Maria Martinez	January 23, 2024	9-141
I.28	Frank Spada	January 23, 2024	9-143
I.29	Ellen Jackson	January 23, 2024	9-145
I.30	Hymon Johson	January 24, 2024	9-147

Table 9-1. List of Public Comments Received on the Draft EIR (Continued)

Comment Set	Name of Commenter	Date Received	Response Location
I.31	Frank Spada	January 24, 2024	9-149
I.32	Carol Colao	January 24, 2024	9-151
I.33	Brandy Zender	January 24, 2024	9-154
I.34	Anonymous	January 29, 2024	9-156
I.35	Brian Bailey	January 30, 2024	9-158
I.36	Frank Spada	January 30, 2024	9-161
I.37	Jacqui Page	January 30, 2024	9-163
I.38	Sheri Dean	January 30, 2024	9-165
I.39	Cindy Hann	January 31, 2024	9-167
I.40	Iskren Azmanov	December 20, 2023	9-169
I.41	Brian Bailey	January 30, 2024	9-171
I.42	Linda Hale	January 31, 2024	9-174
I.43	Martin Krebs	January 31, 2024	9-176
I.44	Dalina M.	January 31, 2024	9-178
I.45	Forrest Fleming	January 31, 2024	9-180
I.46	J. Powell	February 1, 2024	9-182
I.47	Al Ronyecz	February 1, 2024	9-184
I.48	Shalagh Erwin	February 2, 2024	9-186
I.49	Danica Modugno	February 2, 2024	9-188
I.50	Norman Louie	February 2, 2024	9-190
I.51	Philip Tennant	February 2, 2024	9-192
I.52	John Leonard	February 3, 2024	9-195
I.53	Berni Bernstein	February 3, 2024	9-197
I.54	David Meyer	February 3, 2024	9-199
I.55	Araceli Rodriguez	February 3, 2024	9-201
I.56	Elizabeth Ann Arey	February 4, 2024	9-203
I.57	Lily Strong	February 4, 2024	9-205
I.58	Dave Barakat	February 4, 2024	9-207
I.59	Margaret McMillan	February 4, 2024	9-209
I.60	Katie Porter	February 4, 2024	9-211
I.61	Carla Kroman	February 5, 2024	9-213
I.62	Vivian Cordova	February 5, 2024	9-215
I.63	Cathy Fletcher	February 5, 2024	9-217
I.64	Carla Kroman	February 5, 2024	9-219
I.65	Sandra Aquilar	February 5, 2024	9-221
I.66	Ann Wooten	February 6, 2024	9-223
I.67	Fabiana Pecanha	February 6, 2024	9-225
I.68	Andi Modugno	February 6, 2024	9-227

Table 9-1. List of Public Comments Received on the Draft EIR (Continued)

Comment Set	Name of Commenter	Date Received	Response Location
I.69	Laurel Allen	February 6, 2024	9-229
I.70	Darla Downs	February 7, 2024	9-231
I.71	Johanna Derbolowsky	February 7, 2024	9-233
I.72	Nancy Van Gelder	February 7, 2024	9-235
I.73	Kathryn Miller	February 7, 2024	9-237
I.74	Monica M. Delgado	February 7, 2024	9-240
I.75	Sam Eriz	February 7, 2024	9-242
I.76	Chris Lenci	February 7, 2024	9-244
I.77	Joanne D'Egidio	February 7, 2024	9-246
I.78	Ardyce Peeples	February 8, 2024	9-248
I.79	Amanda Silvey	February 8, 2024	9-250
I.80	Betty L. Jeppesen	February 8, 2024	9-253
I.81	Henry Sander	February 8, 2024	9-257
I.82	James Camp	February 8, 2024	9-260
I.83	Karen Yonally	February 8, 2024	9-262
I.84	Lina Garcia	February 8, 2024	9-264
I.85	Lynne Halterlein	February 8, 2024	9-268
I.86	Ruth Meier	February 8, 2024	9-271
I.87	Sara Lyons	February 8, 2024	9-273
I.88	Bill Cushman	February 8, 2024	9-276
I.89	Craig Gensler	February 8, 2024	9-279
I.90	Cindy Marcus	February 8, 2024	9-284
I.91	Lori Wrenn	February 8, 2024	9-288
I.92	Mette Eriksen	February 8, 2024	9-290
I.93	Matthew Silvey	February 8, 2024	9-292
I.94	Taylor Mann	February 8, 2024	9-295
I.95	Cassidy Harrison	February 9, 2024	9-297
I.96	Ethan Woodill	February 9, 2024	9-299
I.97	Frank Arredondo	February 9, 2024	9-301
I.98	Graham M. Lyons, Mullen & Henzell LLP	February 9, 2024	9-305
I.99	Jeffrey C. Nelson, The Oak Creek Company	February 9, 2024	9-330
I.100	Earl D. Lovelace	February 9, 2024	9-333
I.101	Kendra Duncan O'Connor	February 9, 2024	9-335
I.102	Lawrence E. Hunt, Hunt & Associates Biological Consulting Services	February 9, 2024	9-344
I.103	Lennette Pike	February 9, 2024	9-348
I.104	Laurel Fisher Perez, Suzanne Elledge Planning & Permitting Services, Inc.	February 9, 2024	9-350
I.105	Michael Lozeau, Lozeau Drury LLP	February 9, 2024	9-355

Table 9-1. List of Public Comments Received on the Draft EIR (Continued)

Comment Set	Name of Commenter	Date Received	Response Location
I.106	Steve Brown	February 9, 2024	9-397
I.107	Tristine Rainer	February 9, 2024	9-399
Verbal Comments			
V.1	Marell Brooks, Citizens Planning Association	January 17, 2024	9-403
V.2	Linda Honikman	January 17, 2024	9-405
V.3	Kendra Duncan O'Connor	January 17, 2024	9-407
V.4	Michael Lozeau, Lozeau Drury LLP	January 23, 2024	9-410
V.5	Betty Jeppesen	January 23, 2024	9-415
V.6	Linda Honikman	January 23, 2024	9-417
V.7	Cindy	January 23, 2024	9-419
V.8	Christy Waldon	January 23, 2024	9-421
V.9	Craig Gensler	January 23, 2024	9-423
V.10	Peter Hunt	January 23, 2024	9-426
V.11	Laurel Perez	January 23, 2024	9-428
V.12	Kendra Duncan O'Connor	January 23, 2024	9-432
V.13	Amanda	January 23, 2024	9-434
V.14	Frank Arredondo	January 23, 2024	9-432

9.4 Master Responses

The County P&D received a number of similar comments on the Draft EIR, expressing common issues among those submitting written and/or oral comments. To address these issues and supplement individual responses, Master Responses were prepared for recurrent topics. The Master Responses provide a means of addressing overarching issues in a more concise manner than providing repetitive responses to individual comments and to avoid excessive repetition. In some cases, an individual comment may be answered in total or in part by one or more Master Responses, with the individual response noting the link to Master Response(s) to such comments and expanded upon in the specific response, where needed. This approach will help individual commenters easily track where and how their comments have been addressed to ensure transparency and ease of access to responses.

The Master Responses include the County P&D's feedback on the following topics:

9.4.1 Master Response 1 – Comments in Support or Against the Project

Some comments received on the Draft EIR express support for or opposition to the proposed Project and/or its alternatives either due to the nature, scale, or extent of proposed programs and potential rezone sites, the goals or objectives of the proposed Project, or due to the impacts of the Project analyzed and presented in this EIR. Some of these comments express the commenter's opinion on the

"project" or other aspects of the Housing Element Update (e.g., Regional Housing Needs Allocation [RHNA] distribution, housing site selection), rather than the sufficiency of the Draft EIR. It is part of the basic purpose of CEQA to inform governmental decision-makers and the public about the potential significant environmental effects of proposed activities and facilitate public participation in the decision-making process. Pursuant to CEQA Guidelines Section 15088, the focus of response to comment in this document is on comments pertaining to the technical sufficiency and adequacy of the EIR and its analysis of environmental impacts. Some comments received on the Draft EIR did not address specific environmental issues, environmental effects, proposed mitigation measures, project alternatives, or otherwise address the adequacy of the EIR in evaluating these issues. Therefore, no further response or additional analysis is required in this EIR.

Nevertheless, the County appreciates and acknowledges these comments and/or concerns. Individual comments expressing support for or opposition to the proposed Project and/or its alternatives will be forwarded to decision-makers for future consideration during public hearings.

9.4.2 Master Response 2 – Opposition to Selection of Rezone Site No. 11 (Glen Annie)

Many comments received on the Draft EIR specifically express opposition to the consideration and/or selection of Potential Rezone Site No. 11 (Glen Annie). Commenters state that the site is not an appropriate location for housing due to the recreational value the golf course provides, the existing biological resources and habitat value the site supports, the sites value as a buffer to wildfire for uses to the south, traffic and emergency access, existing steep slopes, location of the site outside the urban boundary, and the sites existing agricultural zoning.

The EIR provides a programmatic analysis of impacts associated with future development of identified rezone sites, including Potential Rezone Site No. 11 (Glen Annie). Potential environmental impacts are addressed programmatically in this EIR because the proposed Project would implement the Housing Element Update's goals, policies, and programs, which would compel commensurate changes to the Land Use Element and the County's zoning ordinance. The proposed Project and these implementation actions (including the potential rezones) do not involve specific development plans or housing project proposals. Further, site-specific development and land use details for all potential future housing development projects are not available at this time, and the type, location, and intensity of future housing development activities are reasonably expected to evolve. Rather, this programmatic analysis considers the policies and programs that would enable the production of housing at varying affordability levels in the unincorporated areas of the county's five Housing Market Areas (HMAs; Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and South Coast). While the details for future housing development projects are unknown and speculative, this EIR estimates the reasonably foreseeable location and extent of housing development associated with the proposed Project based on the maximum potential buildout of the sites inventory included in the Housing Element Update.

Impacts associated with rezoning of rural agricultural zoned lands are analyzed in Section 3.2, *Agricultural Resources.* Impacts to biological resources and loss of habitat are analyzed in Section 3.4, *Biological Resources.* Impacts associated with potential land use conflicts and plan and policy consistency are analyzed in Section 3.10, *Land Use and Planning.* Impacts associated with recreational facilities are analyzed in Section 3.13, *Public Servies and Recreation.* Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.* Impacts associated with

transportation and circulation are analyzed in Section 3.14, *Transportation*; however, as discussed therein, consistent with the requirements of Senate Bill (SB) 743, the CEQA Guidelines, and the County's *Environmental Thresholds and Guidelines Manual*, the discussion focuses on Vehicle Miles Traveled (VMT), which measures the number of vehicle trips and their distances, rather than Level of Service (LOS), which measures roadway capacity, intersection operations, and traffic congestion. It should be noted that as a Program EIR, the impacts identified in this EIR are described at a programmatic level. That is, potentially significant impacts identified are described for the whole of the proposed Project and are not identified or characterized on a site-by-site basis.

Further, impacts associated with geology and soils, including issues of slope stability, are discussed in Chapter 5, *Other CEQA Considerations.* However, as discussed therein, the proposed Project would not have the potential for significant impacts associated with geology and soils given that future housing development projects would be subject to compliance with numerous state and local regulations, including the California Building Code (CBC), the Alquist Priolo Earthquake Fault Zoning Act, the County's Comprehensive Plan, and the County's Grading Code (County Code, Chapter 14), which adequately addresses many geologic hazards affecting individual sites.

Nevertheless, the County recognizes community members' desire to not select Potential Rezone Site No. 11 (Glen Annie) and the many amenities the existing Glen Annie Golf Course provides for recreation and open space. However, due to the significant lack of available sites to accommodate the South Coast RHNA and to provide the Board flexibility in the selection of sites for rezone, the County must consider a range of potential rezone sites that meet the state's criteria. The long-term viability of a golf course land use at this location is uncertain and it is reasonable for the County to identify appropriate alternate uses at this location for future development. The County Board of Supervisors will use the information presented in this EIR to inform its final selection of sites to rezone as part of the adopted 2023-2031 Housing Element Update.

9.4.3 Master Response 3 – Opposition to Rezoning Lands in Eastern Goleta Valley

Some comments received on the Draft EIR specifically express concern and/or opposition to the rezoning of lands within the Eastern Goleta Valley, particularly given existing constraints for many of these sites, including airport hazards, flooding, agricultural resources, water supplies, etc. As described in the Housing Element Update, much of the County's lands are rural and lack adequate services and infrastructure to support the number of housing units the state requires as part of the Housing Element Update sites inventory. Many rural lands are productive agriculture and have agricultural preserve contracts in place. Others are constrained by numerous hazards and protected natural resources. These constraints in the Rural Area necessitate the identification of sites to accommodate the RHNA in the Urban Area, where services, infrastructure, transportation, and jobs are available, consistent with the state's criteria which require prioritization of sites in the Urban Area. Locating new residential development in existing urban areas or adjacent to the urban boundary near jobs would reduce regional trips and VMT, and greenhouse gas (GHG) emissions.

As described in Chapter 2, *Project Description,* the Santa Barbara County Association of Governments (SBCAG) specified in the RHNA Plan 6th Cycle 2023-2031 that the County must accommodate 5,664 of these units in the unincorporated county (SBCAG 2021b) and set the affordability level of these units (i.e., very low, low, moderate, and above moderate). It also divided the RHNA into two sub-regions,

the South Coast and North County, and allocated nearly three-quarters of the RHNA to the South Coast. Thus, the County does not have the authority to distribute these units throughout the County.

Through the County's process of identifying sites to support the RHNA within the South Coast, no sites were proposed for rezones in Montecito, Hope Ranch, or Summerland due to few vacant or underutilized sites being available that also meet the state's minimum criteria. Of those that the County analyzed, site-specific constraints eliminated them from further consideration. In addition, beginning with this Housing Element Update, Government Code Section 65583.2(g)(2) now requires local jurisdictions to demonstrate why an existing use does not constitute an impediment to additional residential development for any proposal to rezone a developed site to meet the RHNA (i.e., by 2031). At a minimum, the justification would require expressed interest by the property owner. Property owners for several non-vacant sites the County considered in these communities were not supportive of the County's interest in rezoning the sites for housing. Thus, as most sites in these areas are already developed, they are not included in the Housing Element Update.

The EIR provides a programmatic analysis of impacts associated with future development of potential rezone sites within the Eastern Goleta Valley, including impacts on agricultural resources, biological resources, airport hazards, hydrology and flood hazards, land use plan and policy consistency, airport noise, water supply, and transportation/VMT. Impacts associated with rezoning of rural agricultural zoned lands are analyzed in Section 3.2, *Agricultural Resources.* Impacts to biological resources and loss of habitat are analyzed in Section 3.4, *Biological Resources.* Impacts associated with airport land use conflicts and airport hazards are analyzed in Section 3.8, *Hazards and Hazardous Materials.* Impacts associated with hydrology and flood hazards are analyzed in Section 3.9, *Hydrology and Water Quality.* Impacts associated with potential land use conflicts and plan and policy consistency are analyzed in Section 3.10, *Land Use and Planning.* Impacts associated with noise, including airport-related noise, are analyzed in Section 3.11, *Noise.* Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation;* however, as discussed therein, consistent with the requirements of SB 743, the CEQA Guidelines, and the County's *Environmental Thresholds and Guidelines Manual*, the discussion focuses on VMT, which measures the number of vehicle trips and their distances, rather LOS, which measures roadway capacity, intersection operations, and traffic congestion. Impacts associated with water supply and utilities are analyzed in Section 3.15, *Utilities and Water Supply.* It should be noted that as a Program EIR, the impacts identified in this EIR are described at a programmatic level. That is, potentially significant impacts identified are described for the whole of the proposed Project and are not identified or characterized on a site-by-site basis.

Nevertheless, the County recognizes community members' desire to not rezone properties within the Eastern Goleta Valley. However, due to the significant lack of available sites to accommodate the South Coast RHNA and to provide the Board flexibility in the selection of sites for rezone, the County must consider a range of potential rezone sites that meet the state's criteria. The long-term agricultural viability of a potential rezone sites within the Eastern Goleta Valley is uncertain and it is reasonable for the County to identify appropriate alternate uses at these sites for future development. The Board of Supervisors will use the information presented in this EIR to inform its final selection of sites to rezone as part of the adopted 2023-2031 Housing Element.

9.4.4 Master Response 4 – Opposition to Builder's Remedy Projects

Some comments received on the Draft EIR specifically express concern and/or opposition to the selection or approval of builder's remedy project applications. The Housing Accountability Act (Government Code Section 65589.5) includes a special provision referred to as "builder's remedy." This statute allows developers to bypass a locality's zoning laws when the locality's Housing Element, which is a state-required planning document to address a locality's housing needs, does not comply with state regulations. For the unincorporated area, the County's deadline for State certification of the Housing Element Update was February 15, 2023; however, the Housing Element Update was not adopted by the Board of Supervisors until December 5, 2023, and the State did not find the County's Housing Element Update in substantial compliance with State Housing Element Law until January 22, 2024. Between February 15, 2023 and January 22, 2024, the County was considered to be out of compliance with State Housing Element Law, and the special provisions for builder's remedy were applicable. During this time, prior to January 22, 2024, numerous applications for builder's remedy projects were submitted. Pursuant to State law (California Government Code §65589.5 – Housing Accountability Act), the County is only able to deny or require amendments to these development applications under very narrow circumstances where proposed development applications would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low- and moderate-income households. A "specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. Pursuant to California Government Code §65598.5(d)(2), the following shall not constitute a specific, adverse impact upon the public health or safety:

A. Inconsistency with the zoning ordinance or general plan land use designation.

B. The eligibility to claim a welfare exemption under subdivision (g) of Section 214 of the Revenue and Taxation Code.

9.4.5 Master Response 5 – Opposition to Redtail Development/Bailard Avenue Builder's Remedy Project

Some comments received on the Draft EIR specifically express concern and/or opposition to Pending Project No. 37 (Bailard), referred to by some commenters as Red Tail Development. As provided in Chapter 2, *Project Description* (see Table 2-13) and Chapter 3, *Environmental Impact Analysis,* the EIR includes analysis of potential housing sites in the unincorporated area, including Pending Project No. 37 (Bailard) and No. 11 (Glen Annie) other pending housing projects that have not completed County permitting and environmental review.

The permit application and plans for Pending Project No. 37 (Bailard) include a site plan, building elevations, and other specific project details. However, as previously described in Master Response 2, this EIR analyses potential housing sites and implementation of the Housing Element Update's goals, policies, and programs at a programmatic level. Therefore, the EIR analyzes the environmental impacts based on the location and maximum number of housing units for potential housing sites. This means that the EIR does not provide site-specific or project-specific analyses for Pending Project No. 37 (Bailard) or other potential housing sites.

Impacts to aesthetic and visual resources, including visual compatibility and obstruction of public views are analyzed in Section 3.1, *Aesthetics and Visual Resources.* Impacts to biological resources and loss of habitat are analyzed in Section 3.4, *Biological Resources.* Impacts associated with potential land use conflicts and plan and policy consistency are analyzed in Section 3.10, *Land Use and Planning.* Impacts associated with recreational facilities are analyzed in Section 3.13, *Public Servies and Recreation.* Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.* Impacts associated with transportation, circulation, and traffic safety are analyzed in Section 3.14, *Transportation*; however, as discussed therein, consistent with the requirements of SB 743, the CEQA Guidelines, and the County's *Environmental Thresholds and Guidelines Manual*, the discussion focuses on VMT, which measures the number of vehicle trips and their distances, rather than LOS, which measures roadway capacity, intersection operations, and traffic congestion. It should again be noted that as a Program EIR, the impacts identified in this EIR are described at a programmatic level. That is, potentially significant impacts identified are described for the whole of the Project and are not identified or characterized on a site-by-site basis.

With regards to concerns for impacts to parking or adequacy of parking for Pending Project No. 37 (Bailard), court rulings and the CEQA Guidelines have made clear that parking impacts (i.e., the adequacy of parking) is not a CEQA issue requiring analysis in an EIR, unless effects of parking capacity cause secondary effects (*San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* [2002] 102 Cal.App.4th 656; *Save Our Access – San Gabriel Mountains v. Watershed Conservation Authority* [2021] Cal.App.5th), or if warranted based on the project and its setting (*Save Our Access – San Gabriel Mountains v. Watershed Conservation Authority* [2021] Cal.App.5th; Public Resources Code Section 21099[d][1]). Consistent with the findings of the courts and the CEQA Guidelines, the EIR does not analyze the impacts associated with availability of parking as a CEQA issue.

9.5 Response to Comments

The following pages contain copies of the comment letters. Presented first is a copy of the comment letter with vertical lines indicating the extent of specific numbered comments, and on the subsequent pages are the corresponding numbered responses to individual comments.

9.5.1 Agencies

California Department of Transportation

AERONAUTICS PROGRAM
DIVISION OF TRANSPORTATION PLANNING
P.O. BOX 942873, MS–40 | SACRAMENTO, CA 94273–0001
(916) 654-4959
www.dot.ca.gov

February 9, 2024

Hannah Thomas Electronically Sent <pullenh@countyofsb.org>
Planner
County of Santa Barbara, Planning and Development
Planning and Development 123 E. Anapamu Street
Santa Barbara, CA 93101

Re: SCH #2022070490 County of Santa Barbara 2023-2031 Housing Element Update

Dear Ms. Thomas:

The California Department of Transportation, Caltrans Aeronautics has reviewed the Draft EIR for the County of Santa Barbara 2023-2031 Housing Element Update. One of the goals of the California Department of Transportation, Aeronautics, is to assist cities, counties, and Airport Land Use Commissions or their equivalent (ALUC), to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq. Caltrans encourages collaboration with our partners in the planning process and thanks you for including the Aeronautics Program in the review of the Draft EIR.

In accordance with CEQA, Public Resources Code Section 21096, the Caltrans California Airport Land Use Planning Handbook (Handbook) must be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries, or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource for all public use airports and is available online at: https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf A.1-1

The Santa Barbara County Association of Governments (SBCAG) serves as the Airport Land Use Commission (ALUC) for Santa Barbara County, in this capacity it has adopted airport land use compatibility plans (ALUCP) for four airports: Santa Barbara Airport, Santa Maria Airport, Lompoc Airport, Santa Ynez Airport, as well as the Vandenberg Space Force Base pursuant to the PUC, Section 21674. An ALUCP is crucial in minimizing noise nuisance and safety hazards around airports while promoting the orderly development of airports, as declared by the California Legislature. A responsibility of the ALUC is to assess potential risk to aircraft and persons in airspace and people occupying areas within the vicinity of the airport.

General Plans

Per the California Public Utilities Code Section 21001 et seq. relating to the State Aeronautics Act, Section 21676(b) prior to the amendment of a general plan…within the planning boundary established by the airport land use commission pursuant to Section 21675, the local agency shall first refer the proposed action to the commission. If the commission determines that the proposed action is inconsistent with the commission's plan, the referring agency shall be notified. Any proposed development in the defined safety zones, therefore, must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan(s) adopted by the ALUC pursuant to the PUC, Section 21674.

A.1-1 Cont.

Housing

The Draft EIR for the County of Santa Barbara 2023-2031 Housing Element Update outlines new housing development in airport Safety Zones 2, 4, and 6 of the Santa Barbara Airport and the Santa Maria Airport. The Housing Element should meet the requirements of these safety zones, which stipulates density and intensity measures, and land use restrictions including the restriction of new residential development in Safety Zone 2 per the ALUCPs. The implementation of MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements) aims to ensure compliance with the requirements of ALUCPs and restrict the use of future development of sites in airport safety zones.

Caltrans Aeronautics stresses the importance of considering the compatibility policies in the ALUCPs, with references in the Caltrans Aeronautics Handbook for supplemental guidance. Caltrans Aeronautics understands that the County is facing affordable housing supply shortages and is looking for new areas to accommodate residential developments. Increased residential development in airport safety zones would have the potential to introduce new residents to airport safety hazards. Consequently, environmental justice and equity concerns should also be reviewed for consistency with goals identified in the California Transportation Plan 2050 (CTP 2050) and the California Aviation System Plan 2020 (CASP 2020).

Caltrans Aeronautics notes that new laws regarding the provision of housing do not supersede existing laws, including Section 21670 of the California Public Utilities Code, which require counties to establish ALUCs and compatibility plans to protect public health, safety, and welfare.

A.1-2

Hazards to Flight

Proposed projects may also be subject to 14 CFR Part 77 Conical Surface standards and CNEL contours noise compatibility of an airport, which may require noise reduction measures. Please be aware, Public Utilities Code, Section 21659, "Hazards Near Airports Prohibited" prohibits structural hazards near airports. To ensure compliance with Federal Aviation Regulation, Part 77, "Objects Affecting Navigable Airspace," submission of a Notice of Proposed Construction or Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) may be required.

A.1-3

Compatibility concerns regarding airport obstructions and hazards to flight (such as wildlife attractants, lighting, or glare i.e., solar, etc.) should also be considered for further review upon site specific updates or projects. In addition, any proposed projects identified as hazardous material sites compiled pursuant to Government Code Section 65962.5, compatibility restrictions should be reviewed per the ALUCP of an airport.

Closing Statements

The protection of airports from incompatible land use encroachment is vital to California's economic future. Airports are an economic asset that should be protected through effective airport land use compatibility planning and engagement with stakeholders and the community. Although the need for compatible and safe land uses near airports is both a local and State issue, it is crucial to adhere to the requirement that airport staff, airport land use commissions and airport land use compatibility plans are vital to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport aims to relieve future conflicts between airports and their neighbors.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please contact me at (916) 879-6596 or by email at tiffany.martinez@dot.ca.gov.

Sincerely,

Tiffany Martinez

Tiffany Martinez
Transportation Planner

c: State Clearinghouse <state.clearinghouse@opr.ca.gov>

Comment Letter A.1 – [Caltrans, Aeronautics Program]

Comment Response A.1-1

This comment summarizes the requirements of California Public Utilities Code and the State Aeronautics Act, which requires a determination of general plan amendment consistency with a local Airport Land Use Commission (ALUC) and requires that proposed development in safety zones must adhere to safety criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP). Detailed discussion of airport-related safety hazards and compliance with the ALUCP is provided in Section 3.8, *Hazards and Hazardous Materials.* Consistent with the requirements of the California Public Utilities Code and the State Aeronautics Act, the County would be required to refer applicable general plan amendments to the ALUC for review and determination of consistency with the applicable ALUCP. Further, to ensure consistency with the aircraft safety goals of the ALUCP and avoid airport hazards, the EIR identifies and requires the implementation of **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)**, which would require future applicants for residential development to comply with the density, height, and open land requirements provided in the ALUCPs for Santa Barbara Airport and Santa Maria Airport. For Safety Zone 2, this would require locating all new residential development outside of Safety Zone 2. Residential development within Safety Zone 4 would be required to observe the density of 25 dwelling units per acre (du/ac) or less and comply with open land requirements provided in the ALUCP. Implementation of this mitigation would ensure compliance with the requirements of the ALUCPs and ensure future development of sites within airport safety zones would not generate conflicts or risks associated with airport hazards.

Comment Response A.1-2

The comment notes that new housing development within Safety Zones 2, 4, and 6 of the Santa Barbara Airport and Santa Maria Airport should meet the requirements of these safety zones, and acknowledges the EIR's identification of **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)** to address impacts associated with ALUCP compatibility. These comments are noted and will be forwarded to County decision makers for their consideration.

The comment further states that environmental justice and equity concerns should be reviewed for consistency with goals identified in the California Transportation Plan 2050 (CTP 2050) and the California Aviation System Plan 2020 (CASP 2020), and that new laws regarding provision of housing do not supersede existing laws addressing airport planning and safety. The EIR fully acknowledges and discusses the existing regulatory setting and requirements applicable to the proposed Project, and provides detailed discussion of mandatory compliance with and/or potential inconsistencies with any of these existing regulations. (See Section 3.8, *Hazards and Hazardous Materials,* Section 3.10, *Land Use and Planning,* and Section 3.11, *Noise*.)

While the EIR is not directly required to evaluate economic or social effects, including environmental justice and equity, either as a part of CEQA or the County's *Environmental Thresholds and Guidelines Manual,* the Housing Element Update includes policies and programs intended to help address environmental justice and equity within the County. Program 25 of the Housing Element Update would require that the County continue to carry out a variety of place-based measures designed to revitalize communities in the County and ensure equitable quality of life with a focus on environmental justice communities. As part of the actions and implementation strategies of Program 25, the County will continue to conduct outreach to environmental justice communities and implement the policies and actions of plans addressing environmental justice and equity, including

the County's Active Transportation Plan, pending Recreation Master Plan, and pending Environmental Justice Element. Further, inherent to the proposed Project are the implementation of actions and programs necessary to achieve the County's RHNA, which includes a substantial need for more lower- and moderate-income housing throughout the County to address the house crisis and related social and economic inequities. Though the CTP 2050 and CASP 2020 include goals and objectives for environmental justice and equity, these plans and associated policies are specifically related to the addressing environmental justice in the transportation environment and relate primarily to state-funded transportation projects. As such, these plans and policies are not considered to be directly applicable to the proposed Project, and detailed discussion of potential consistency with these plans and policies is not required in this EIR.

Comment Response A.1-3

Impacts associated with airport-related hazards, including airport safety, compatibility concerns, and noise, are thoroughly discussed in the EIR in Section 3.8, *Hazards and Hazardous Materials* (Impact HAZ-4), Section 3.10, *Land Use and Planning* (Impact LU-2), and Section 3.11, *Noise* (Impact NOI-4). As discussed therein, the Housing Element Update identifies potential sites for future development of housing that lie within the Airport Influence Area (AIA) of the Santa Barbara Airport and Santa Maria Airport. Sites located within the AIA are subject to compliance with all existing regulations, standards, plans, or policies affecting the use and development of land within an AIA. Further, to ensure consistency with the aircraft safety goals of the ALUCP and avoid airport hazards, the EIR identifies and requires the implementation of **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)**, which would require future applicants for residential development to comply with the density, height, and open land requirements provided in the ALUCPs for Santa Barbara Airport and Santa Maria Airport.

In addition, discussion has been included in the analysis presented in Impact AV-3 in Section 3.1, *Aesthetics and Visual Resources* to acknowledge potential impacts associated development of uses which could generate light or glare within the AIA that might create impacts or conflicts with airport operations. However, as previously described, future development of housing sites within the AIA would be subject to compliance with all existing regulations, standards, plans, or policies affecting uses and development of land within the AIA, including Federal Aviation Administration (FAA) rules and regulations addressing sources of glare and distracting lights.

Comment Response A.1-4

The comment states that the protection of airports from incompatible land use encroachment is vital to California's economic future and that it is crucial to adhere to the requirement that airport staff, airport land use commissions, and airport land use compatibility plans are vital to protecting and airport and people residing in the vicinity. This comment has been noted and will be forwarded to County decision makers for their consideration. Please also refer to Master Response 1.

CITY OF GOLETA

February 9, 2024

SENT VIA EMAIL
housingelement@countyofsb.org

CITY COUNCIL

Paula Perotte
Mayor

Luz Reyes-Martín
Mayor Pro Tempore
District 1

Stuart Kasdin
Councilmember

James Kyriaco
Councilmember
District 2

Kyle Richards
Councilmember

CITY MANAGER
Robert Nisbet

Hannah Thomas, Project Planner
Planning & Development Department
County of Santa Barbara
123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Santa Barbara County 2023-2031 Housing Element Update Draft Program Environmental Impact Report Comments

Dear Ms. Thomas:

Thank you for the opportunity to review and comment on the County's 2023-2013 Housing Element Update Draft Program Environmental Impact Report (Draft PEIR), dated December 2023, State Clearinghouse No. 2022070490. The 2023-2031 Housing Element Update project (Project) includes many programs and actions to facilitate housing in the unincorporated areas of Santa Barbara County. We understand the challenge the County has faced in meeting state requirements related to the Project. However, it is critical to understand, analyze, and mitigate the impacts of the Project, thus ensuring that all impacts to the environment and surrounding community are fully addressed.

Most notably, the Project includes the rezoning of sites located adjacent to the City of Goleta (City), converting agricultural zoning to high density residential zoning. Of highest concern to the City is the rezoning of the following sites included in the Draft PEIR project description and the significant number of potential units associated with these sites:

- Sites 1 through 7 (South Patterson Agricultural Area) – 7,708 units
- Site 11 – Glen Annie Golf Course – 2,673 units

All of the above sites are only accessible through the City and any future residents on these sites will rely on the City's transportation network, open space and recreational spaces, emergency response facilities, and other resources.

A.2-1

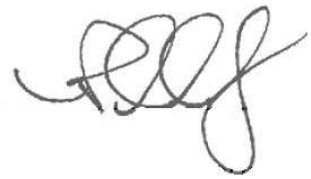
Under the California Environmental Quality Act, a lead agency's duty to mitigate or avoid its project's significant impacts extends beyond the boundaries of the project area. (See *City of Marina v. Board of Trustees of Cal. State University* (2006) 39 Cal.4th 341, 359-360 [agency not excused from analysis or mitigation of impacts outside of its jurisdiction]; see also *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369 [CEQA's purpose would be undermined if agencies could proceed "without an awareness of the effects a project will have on areas outside the boundaries of the project area."].) Based on our review of the Draft PEIR, we identified needed changes to better disclose, evaluate, and mitigate possible impacts relevant to the City. These changes are detailed in the attached comment matrix. Of note and as detailed in the comment matrix, the Draft PEIR omits critical discussion or analysis of Goleta General Plan policies or existing and planned infrastructure and capital projects within the City. Without consideration of City policies and projects, the analysis in the Draft PEIR is incomplete.

Also of note and detailed in the comment matrix is the need to add additional mitigation measures to address the impacts of the Project on our community. These include the need for a Traffic Mitigation Agreement between the City and County to address growth in the County lands southeast and north of the City. The comment matrix identifies the need for a broader agreement between the County and City to address payment of impact fees to Goleta, fair share payments for Goleta capital projects, the construction of Fire Station 10, and the construction of needed infrastructure as part of housing projects envisioned under the Project. The timing of these necessary mitigation measures is also critical to ensure adequate services are provided to the community. As such, these mitigation measures must include requirements that the impacts to the City be addressed prior to issuing any certificates of occupancy for new housing development envisioned with the project.

A.2-1 Cont.

Addressing City comments will be critical to ensure that the Final PEIR provides adequate environmental analysis and mitigation for the Project. The City respectfully requests that the necessary changes as identified and described in this letter and in the attached comment matrix be included in the Final PEIR. If you have any questions regarding our comments, don't hesitate to contact me at pimhof@cityofgoleta.org or 805-961-7541.

Sincerely,



Peter Imhof
Planning and Environmental Review Department Director

Attachment: Goleta Comment Matrix

cc: Robert Nisbet, City Manager
Charlie Ebeling, Public Works Director
Nina Buelna, Assistant Public Works Director
Anne Wells, Advance Planning Manager

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments	
General Comments			
Global		The regulatory setting includes details regarding County policies but there is no information provided regarding the City of Goleta setting. The EIR must analyze all direct and reasonably foreseeable indirect impacts of the Housing Element, including impacts relating to a change in the pattern of land use or population density. (State CEQA Guidelines, §§ 15126.2(a), §15358(a).) A lead agency's duty to mitigate or avoid its project's significant impacts extends beyond the boundaries of the project area. (See *City of Marina v. Board of Trustees of Cal. State University* (2006) 39 Cal.4th 341, 359-360; see also *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369.) Because Rezone Sites 1-7 and 11 are on the City of Goleta's boundary and will impact City resources, Goleta General Plan / Coastal Land Use Plan policies must be included in the DPEIR and analyzed throughout. Additional mitigation should be included to address consistency with Goleta policy.	A.2-2
Executive Summary			
ES-14 (and Global)	Table ES-3	The impacts listed in the column titled "Impact Classification" needs to reflect the categories explained on page ES-6. Failure to distinguish potentially significant impacts between those that are unmitigable and those that are mitigable obfuscates the impacts of the project as displayed in the Executive Summary. Some specific examples are provided below. The same clarity must also be provided in the individual impact analysis sections.	A.2-3
ES-14	Table ES-3	Impact AV-2 is not identified correctly. Currently, this impact restates Impact AV-3.	A.2-4
ES-15	Table ES-3	In Section 3.2, Impacts AG-1, AG-2, and Cumulative Impacts are all listed as "Significant and unavoidable" but are listed in Table ES-3 as "Potentially significant."	A.2-5
ES-53-54	Table ES-3	The impacts for LU-2 and LU-3 must be listed as "Significant and unavoidable." See comments under Section 3.10.	A.2-6
ES-53	Table ES-3	The Residual Impacts for LU-3 need to be listed as "Significant and unavoidable." See comment under Section 3.10.	A.2-7
ES-54	Table ES-3	In Section 3.10.4.3, the Cumulative Impacts for Land Use and Planning are identified as "Significant and unavoidable" (p. 3.10-64) but are identified as "Potentially significant" in Table ES-3. This discrepancy must be remedied.	A.2-8
ES 65–66	Table ES-3	In Section 3.15.4.2, Impacts USW-1 through USW-4 are listed as significant and unavoidable, but are listed in Table ES-3 as "Potentially significant." Table ES-3 needs to be corrected.	A.2-9
Chapter 1: Introduction			
Section 1.5: Agencies and Roles			
1-6	Table 1-1. Agencies and Roles	The City of Goleta should be added to the "Other Interested Agencies" category due to the fact that many of the impacts analyzed will be borne, at least in part, by the City of Goleta. (See Pub. Resources Code, §21153(a); State CEQA Guidelines, §15086(a) [consultation is required from any city which borders on a city or county within which the project is located].)	A.2-10
Chapter 2: Project Description			
Section 2.3: Housing Element Update			

Page Ref.	Doc. Reference	Comments	
2-15	Table 2-4	Allowing conversion of agricultural water to residential water for affordable housing projects and the transfer of water credits between properties could impact the City of Goleta's water resources and infrastructure. This could be mitigated by additional water allotments for the Goleta Water District to address these changes. (State CEQA Guidelines, §§ 15121(a), 15126.4(a) [EIR must identify and describe feasible mitigation measures that can minimize each of the project's significant environmental impacts].)	A.2-11
2-17	Scope of Analysis	The EIR must include analysis of Housing Element Program 16 (allowing multifamily in commercials zones) and this program needs to be described in detail and analyzed throughout the EIR. (State CEQA Guidelines, §15378 [project is defined as "the whole of action"]; see *Laurel Heights Improvement Ass'n. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 396 [EIR must consider all phases of project].) Assumptions need to be detailed on the increase in development that this program will lead to. This program will likely dramatically change the potential population buildout in this EIR and will thus dramatically impact many sections of the EIR. New mitigation measures, or altered mitigation measures, including those related to transportation and services, may be needed.	A.2-12
2-18	2.3.2 Project Components	Potentially reduced setbacks and an increase in developable area from 30% to 40% for DR could negatively impact the aesthetic quality of the City of Goleta, particularly along borders adjacent to the County's DR rezone sites. Additionally, these development standard changes would reduce opportunities for on-site open space and thus exacerbate demands for these public services elsewhere. These impacts must be analyzed. Finally, these changes and the reduced open space provided on site, serve to counteract MM LU-1 (which allowed commercial recreational facilities in DR).	A.2-13
2-30	Potential Housing Growth	This analysis must include the mixed-use development potential pursuant to Program 16.	A.2-14
Section 2.4: Required Actions and Approvals			
2-39	2.4 Required Actions and Approvals	The EIR must provide much clearer details on the community plan amendments that are needed to implement this project. These community plan amendments are part of the project, not mitigation for a later date. As such, they need to be made clear in the project description. (State CEQA Guidelines, §15378 [project is defined as "the whole of action"]; see *Laurel Heights Improvement Ass'n. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 396 [EIR must consider all phases of project]; *Cleveland Nat'l Forest Found. v. San Diego Ass'n. of Gov'ts.* (2017) 17 Cal.App.5th 413, 440 [it is not appropriate to defer more specific analysis if such information is available at the program EIR stage or if there is no substantial evidence to support the decision to defer such analysis].) The project must also analyze whether any changes (SEIR, Addendum, etc.) are needed for community plans. Any changes to other CEQA documents to amend community plans must also be included with the Project.	A.2-15
Chapter 3: Environmental Impact Analysis			
Section 3.0: Introduction and Approach to Analysis			

Page Ref.	Doc. Reference	Comments	
3-4	Impact Assessment Assumptions and Buildout Scenarios	The description of the buildout scenario reflects the development envisioned in the County's Housing Element, not a reflection of future development in the Project area. This summary omits consideration of projects within incorporated cities, like Goleta. For instance, new housing projects like Heritage Ridge should be included as well as capital projects, like the roundabouts at Highway 217 and Hollister Avenue (now part of Project Connect, but on the City's CIP list for many years).	A.2-16
3-4	Baseline	A second Notice of Preparation was released on August 11, 2022. This should be noted in this section and any changes in the baseline should be included in the EIR.	A.2-17
Section 3.1: Aesthetics and Visual Resources			
3.1-23, 3.1-25	Impact AV-1 and AV-2	The PDEIR includes no explanation as to how Mitigation Measure MM AV-1 would help address public scenic vistas and visual resources or scenic qualities. (*League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 121 [courts will not defer to lead agency's determination that mitigation measure will work when their efficacy is not apparent and there is no evidence in the record showing they will be effective].) The County's objective design standards do not include specific protections for visual resources. As such, MM AV-1 is an inadequate mitigation measure to address this impact.	A.2-18
3.1-26	Impact AV-3	The EIR must include additional mitigation for Impact AV-3 (and AV-1 and AV-2) that addresses impacts to the surrounding community and scenic resources, as the potential impacts from this project from light and glare are not insignificant. Mitigation must include specific standards related to lighting at the top of, and above, the existing height standards for DR to address new lighting impacts from the taller projects allowed under this Project. Additionally, mitigation is also needed to ensure there is no light trespass as a result of allowing structures closer to property lines under this Project. As the DPEIR notes, "light trespass and glare shall be reduced to the maximum extent feasible." This is a subjective requirement that is not enforceable on ministerial projects.	A.2-19
Section 3.4: Biological Resources			
3.4-39	MM BIO-2	For MM BIO-2, there is potential for an applicant to argue that the decision for "avoidance, minimization, or compensatory measures" is subjective and thus enforceable. To ensure protection of biological resources, the language of this mitigation measure must be revised to ensure enforceability and protection of critical biological resources, including for several creeks that run through, or adjacent to, sites included in the Project for rezoning.	A.2-20
3.4-39	MM BIO-2	"Compensatory measures" should not be included in MM BIO-2. If the project cannot avoid the impacts, the project design needs to be reconsidered.	A.2-21
3.4-39	MM BIO-2	Allowing a biologist to determine "to the maximum extent feasible" a 100-foot buffer for ground disturbance and vegetation removal from sensitive habitats, watercourses, or riparian habitats is subjective and potentially unenforceable. This language must be revised to ensure the application of the buffer standard is objective and enforceable and protects the resources in question.	A.2-22

Page Ref.	Doc. Reference	Comments	
3-4.35	Impact BIO-4	The PDEIR concludes that no mitigation is feasible for the conflicts with existing policy and regulation regarding protection of creeks. However, there is potential mitigation for this impact that must be identified as follows. A mitigation measure must be included to revise the relevant policies in the Goleta Community Plan and Eastern Goleta Valley Community Plan to ensure their application to ministerial projects. The timeline for implementation of this measure must be in the next year to ensure new housing development does not sacrifice critical local biological resources.	A.2-23
Section 3.8: Hazards and Hazardous Materials			
3.8-39	MM HAZ-3	This mitigation measure must not be limited as it is written. This requirement must apply to all projects, not just those on County property or qualifying for ministerial review, as application of the newly adopted ALUCP is not currently included in the County's policies or development standards.	A.2-24
3.8-39	MM HAZ-3	MM HAZ-3 must not be limited to ALUCP density, height, and open space standards. This mitigation measure should make clear that new development must comply with the entirety of the ALUCPs. This mitigation should also explicitly acknowledge the need to comply with FAA requirements, including a Part 77 analysis (which may significantly limit the height of proposed housing development).	
3.8-39	MM HAZ-3	Figures 7 and 24 of the Eastern Goleta Valley Community Plan will also need updating.	
Section 3.10: Land Use and Planning			
3.10-20	Local Regulatory Setting	The regulatory setting includes details regarding County policies but there is no information provided regarding the City of Goleta setting. Because Rezone Sites 1-7 and 11 are on the City of Goleta's boundary and will impact City resources, a section detailing related Goleta General Plan / Coastal Land Use Plan policies must be added and analyzed throughout Section 3.10. Additional mitigation should be included to address consistency with Goleta policy.	A.2-25
3.10-25–63	Impacts LU-2 and LU-3	The analysis of these two impacts does not disclose whether the impacts are "Significant and unavoidable" or "Less than significant with mitigation." For both impacts, the analysis concludes that mitigation measures would reduce significant impacts, but provides no explanation as to whether or how those mitigation measures could reduce impacts to less than significant. As such, the analysis of Impacts LU-1 and LU-2 must disclose that these impacts, even with mitigation, are significant and unavoidable. Table ES-3 should be updated to reflect this as well.	A.2-26
3.10-25–60	Impact LU-2 and Table 3.10-3.	The analysis of this impact must include Eastern Goleta Valley Community Plan policies TC-EGV-1.1 and TC-EGV-1.2. These policies require level of service standards and long-term improvements to multimodal transportation facilities targeted to provide for these levels of service. Mitigation measures to address impacts due to development that must rely on City of Goleta roadway infrastructure, including execution of an MOU with the City of Goleta for contributions of impacts fees and for the provision of fair-share contributions for City of Goleta capital projects, must be included in the mitigation for any impacts identified. Without such analysis and mitigation, the EIR does not adequately address and analyze this impact.	A.2-27

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments	
3.10-28	Table 3.10-3 (and Impact LU-2)	Table 3.10-3 includes no references to the Goleta Community Plan. As such, the analysis provided is entirely inadequate for consideration of Rezone Site No. 11 (Glen Annie). Mitigation for this planning area must be included similar to that noted above, including an MOU with the City of Goleta, to address transportation impacts in Goleta.	A.2-28
3.10-63	Impact LU-3	This impact must acknowledge that the local streets impacts will be in the City of Goleta. This is made evident by the fact that the development of the South Patterson agriculture block estimated growth would increase average daily trips (ADT) on South Patterson Avenue (a City of Goleta street) by 130 percent.	A.2-29
3.10-64–65	MM LU-1	MM LU-1, as prepared, is far too broad in scope and vague to the point where the impacts created by this mitigation measure may be significant and unavoidable in their own right. If a mitigation measure identified in an EIR would itself cause significant environmental impacts distinct from the significant effects caused by the project, those impacts must be discussed in the EIR. (State CEQA Guidelines, §15126.4(a)(1)(D).) MM LU-1 must be revised to (1) limit the allowances to the sites considered for rezoning as part of this project; (2) limit the size of commercial development (by square footage and/or size of the project; and (3) only allow with discretionary review. This is needed because there is no way to understand the impacts of this mitigation measure simply by limiting the uses to "neighborhood-serving commercial uses." The reality is that these uses could vary greatly. For example, a coffee shop can serve the neighborhood, yet also generate significant traffic and impacts to the area that may already be stressed by the significant new residential development. Additionally, by allowing commercial uses in all of DR, the County may potentially contribute to a loss of housing on sites where a property owner chooses to convert existing housing on a DR site to commercial uses. Additionally, the language of the mitigation measure (e.g. "steep slopes," "may require," "are compatible," "an integral part, " "adverse effects on residential uses") are subjective and therefore unenforceable for ministerial projects. As such, the language needs to be revised unless these uses are reviewed only through a discretionary process.	A.2-30
3.10-65	MM LU-1, (Residual Impacts)	The analysis of secondary impacts for MM LU-1 is purely speculative. The commercial uses could include additional impacts throughout the County on DR designated parcels and must be analyzed. Impacts could include loss of existing housing and new impacts from commercial uses sites throughout the County on sites previously designated only for residential use.	A.2-31
3.10-66	Impact LU-3 (Residual Impacts)	The analysis of this impact does not explain whether the impact is "significant and unavoidable" or "less than significant with mitigation." The analysis concludes that mitigation measures would reduce significant impacts but provides no explanation as to whether or how those mitigation measures could reduce impacts to less than significant. As such, the analysis of residual impacts of Impact LU-3 must disclose that this impact, even with mitigation, is significant and unavoidable. Table ES-3 should be updated to reflect this as well.	A.2-32

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments	
		Section 3.12: Population and Housing	
3.12-20	Impact PH-2	This impact must consider the impact of allowing commercial development within the DR zone district and the impacts that could have on displacement of people and housing.	A.2-33
		Section 3.13: Public Services and Recreation	
3.13-45	Impact PSR-1	The analysis of this impact includes discussion of impact fees, however, because a new fire station is proposed in the City of Goleta, a mitigation measure needs to be included to provide funding for Fire Station 10, particularly for rezone sites (such as, but not limited to, Glen Annie, Rezone Site No. 11) that will likely rely on service from that station. Add a mitigation requiring an MOU between the County and City of Goleta to ensure fees and payments associated with fire response are appropriately allocated to Fire Station 10. Additionally, a mitigation measure must be added to require the construction of Fire Station 10 prior to any new demand for fire services at Glen Annie (Rezone Site No. 11).	A.2-34
3.13-51	Impact PSR-5	A new mitigation measure needs to be included to reflect the reality that increased housing adjacent to the City of Goleta will increase demand for and pressure on City of Goleta parks. This mitigation measure must include a commitment for the County to provide the City of Goleta with park (and Quimby where applicable) fees collected for County housing projects on rezone sites where the residents will rely on City of Goleta parks and open spaces.	A.2-35
		Section 3.14: Transportation	
3.14-9	Table 3.14-4	This table accurately includes Annual Average Daily Trips (AADT) volume and design capacity along Patterson Avenue in the City of Goleta. Because the proposed rezone sites also affect other north-south corridor roadways in the City of Goleta, AADT volume and design capacity needs to be included in Table 3.14-4 for Glen Annie Road (8,000 AADT), Storke Road (35,000 AADT) or Hollister Avenue west of Storke (25,000 AADT). The text summarizing the AADT and design capacity presented in this table also needs to be updated to reflect the addition of these three north-south corridors.	A.2-36
3.14-25	Local Policies	The regulatory setting includes details regarding SBCAG and County settings but there is no information provided regarding the City of Goleta setting. Because Rezone Sites 1-7 and 11 are on the City of Goleta's boundary and will impact City resources, including the City's transportation network, a section detailing related Goleta General Plan / Coastal Land Use Plan policies and analyzed throughout Section 3.14 must be added. Additional mitigation should be included to address consistency with Goleta transportation policies.	A.2-37
3.14-30	Local Policies	Because Sites 1-7 are within the Eastern Goleta Valley Community Plan planning area and Site 11 is within the Goleta Community Plan planning area, the LOS standards from these two planning documents, and other relevant transportation policies from these two plans, must be included and considered in the analysis of impacts in the DPEIR.	A.2-38

Page Ref.	Doc. Reference	Comments	
		Because the project will impact City streets, bike paths, and sidewalks, it must be clarified (in the first paragraph on page 3.14-30) that in addition to the County's Circulation Element, the Goleta General Plan / Coastal Land Use Plan Transportation Element details standards for LOS.	A.2-39
3.14-40	Table 3.14-8	This table summarizes transportation impacts and mitigation measures. Update the table to reflect the additional analysis of City of Goleta transportation policies (not just County) for Impact T-1. Update the table to reflect the new mitigation measure requiring an MOU between the City of Goleta and the County, as detailed in this comment matrix. Such an agreement between the City of Goleta and the County is explicitly identified in the City of Goleta's General Plan subpolicy LU 12.7(c).	A.2-40
3.14-54	Impact T-3, Table 3.14-11	The roadways included in this table are inadequate. The data is provided from Appendix E, which serves to analyze noise, not operational traffic safety. This table must also look at impacts to Storke Road and Glen Annie and Hollister Avenue between Fairview and Patterson. This analysis must also include planned CIPs, such as the Hollister Avenue striping project and the 217 ramp roundabouts. Without including these road segments in the analysis, the scope of this impact is unclear. Roadway capacity analysis is critical to understanding the impact of housing on the rezone sites and how that will impact current and future Goleta capital projects. Additionally, understanding the functionality of Hollister Avenue and Patterson are essential to understanding the viability of access to Goleta Valley Cottage Hospital for emergency services.	A.2-41
3.14-58	Design Features and Hazards	Add text explaining that in addition to MM T-3 (Funding and Mitigation Fee Programs Update), a mitigation measure requiring the execution of an MOU between the City of Goleta and the County to address the mitigation fee program update.	A.2-42
3.14-59	MM T-1	Mitigation measure MM T-1 cannot be required "as feasible." This language makes the implementation subjective and therefore unenforceable for ministerial projects.	A.2-43
3.14-59	MM T-1	Mitigation measure MM T-1 must include reference to City of Goleta planned bike infrastructure, not just projects identified in the County's ATP.	A.2-44
3.14-59	3.14.4.4	Add a new mitigation measure requiring the execution of an MOU between the City of Goleta and the County to address the mitigation fee program, contributions of impact fees to the City of Goleta, the provision of fair-share contributions for City of Goleta capital projects (see also comment on Impact LU-2), and construction of public infrastructure improvements to mitigation impacts to the transportation network as supported by Land Use Element Policies LU 1.13, LU 11, and LU 12 of the City of Goleta's General Plan. The program, impact fee contributions, fair-share capital projects contributions, and construction of public infrastructure improvements will address impacts due to development that must rely on City of Goleta transportation network infrastructure. Without such analysis and mitigation, the EIR does not adequately address and analyze this impact.	A.2-45

Page Ref.	Doc. Reference	Comments	
3.14-59	3.14.4.4	Section 3.14.4.4 of the DPEIR details proposed transportation mitigation measures. The mitigation measures as presented in the DPEIR do not adequately address the need for safety improvement. Update this section to include safety improvement mitigation measures. At a minimum, address safety improvements at the intersections of Cathedral Oaks and Glen Annie, Hollister and Storke, and Storke and Marketplace, and the street segments of Cathedral Oaks, east of Glen Annie and Patterson north of Hollister. These intersections and street segments have all been identified in the Goleta Traffic Safety Study as high collision locations and must be adequately mitigated in this DPEIR. Include detail in the DPEIR explaining that development on Rezone Sites 1-7 and 11 will increase traffic volumes at these intersection and roadways and will therefore increase the number of collisions at these high-collision locations, thus justifying the need for safety improvement mitigation measures.	A.2-46
3.14-61	MM T-3	This mitigation needs to provide for the inclusion of the City of Goleta in this process and to create a mechanism to provide support for the City of Goleta to update and implement capital projects to accommodate the increased demands for City transportation projects for housing projects in the County that will rely on the Goleta transportation network.	A.2-47
3.14-61	MM T-3	The updated fees must include consideration of the improvements needed in the City of Goleta, as that is where the impacts will occur for many of the rezone sites.	A.2-48
3.14-61	MM T-3	The timing of this item must be brought forward as it is a critical mitigation measure. With the timeline currently outlined, this mitigation measure cannot reduce Impact T-1 to significant but mitigable.	A.2-49
3.14-61	MM T-3	The budget and work program must include this item in the first year. Otherwise, it is likely many projects will move forward without addressing the identified impact.	
Section 3.15: Utilities and Water Supply			
3.15-34	Table 3.15-10	This table needs to be corrected to accurately reflect the severity of impacts analyzed in this section.	A.2-50
Section 3.16: Wildfire			
3.16-35	MM WF-1	The language of the mitigation needs to change, as shown, to ensure the mitigation measure is objective in nature and thereby applicable: "A larger setback shall~~may~~ be required if SBCFD determines that a greater distance is required for public and/or firefighter safety."	A.2-51
Chapter 4: Alternatives Analysis			
Section 4.3: Alternatives Selection Methodology			
4-6	Alternatives Selection Methodology	An EIR's statement of project objectives is the touchstone for selection of alternatives for evaluation. (State CEQA Guidelines, § 15124(b).) The alternatives discussed must be able to attain most of the basic objectives of the project. (State CEQA Guidelines, § 15126.6(b).) Based on the comment below, the environmental analysis of the project needs to include feasible alternatives that meet the project objectives. Alternatives should consider other approaches to meet RHNA, such as further supporting infill redevelopment, incentivizing ADUs to a greater extent, and changing the affordability assumptions for rezone sites to count all units towards lower and/or moderate income (as is allowed under state law) and then include fewer rezone sites.	A.2-52

Page Ref.	Doc. Reference	Comments
Section 4.5: Alternatives Considered and Analyzed		
4.26–94	Alternatives 2-5	After running the "Balancing Act" online rezone site selection tool for each of the proposed alternatives, the North County subregion met and exceeded its RHNA targets for all income categories. However, for the South Coast subregion, only Alternative 5 met its RHNA target for all 3 income categories. While the overall RHNA target plus 15% buffer is met for all 4 proposed alternatives, not meeting the South Coast subregion's RHNA target for 3 out of 4 alternatives renders these alternatives inconsistent with the Project's objectives. For the one alternative (Reduced Project C) that still meets the RHNA objective, the only large sites adjacent to the City of Goleta that is not included for rezone is Site No. 1 (Giorgi). However, Giorgi has a builder's remedy application, thereby making the distinction between this alternative and the proposed project insignificant. Without viable alternatives, the analysis of the EIR is incomplete.

A.2-53

Comment Letter A.2 – [City of Goleta]

Comment Response A.2-1

The comment provides a summary of the proposed Project and introduction of comments provided later in this letter requesting changes to the EIR to disclose, evaluate, and mitigate possible impacts associated with selection of Rezone Site Nos. 1-7 and 11 on the City of Goleta.

Detailed responses to discrete comments provided in this letter are provided in the following responses.

Comment Response A.2-2

The comment states that the EIR does not provide any information regarding the City of Goleta setting and asserts that because Program 1 of the Housing Element Update includes consideration of Rezone Site Nos. 1-7 and 11, which are located on the boundary of the City of Goleta. The comment goes on to assert that these rezone sites would impact City of Goleta resources and therefore, the EIR must include analysis of City of Goleta General Plan / Coastal Land Use Plan policies. The comment also states that the EIR must include additional mitigation to address consistency with applicable City of Goleta policies.

Pursuant to CEQA Guidelines Section 15126.2(a), the EIR identifies and focuses on the direct and indirect significant effects of the proposed Project on the existing physical environmental conditions in the Project area. As described in Chapter 2, *Project Description,* the Project area analyzed in this EIR includes unincorporated areas of Santa Barbara County, as well as selected County-owned properties within the City of Santa Barbara. The County is the Lead Agency for the proposed Project, which involves the adoption and implementation of amendments to the Comprehensive Plan and community plans, as applicable, and the County zoning ordinances to implement certain Housing Element Update programs. While the California Coastal Commission would be required to certify amendments to the County's Local Coastal Program, the authority and responsibility to adopt and implement the proposed Project lies solely under the jurisdiction of the County. Therefore, the EIR evaluates the potential impacts of the proposed Project in relation to County land use policies and programs, as well as applicable plans and programs of agencies with special discretion or jurisdiction over unincorporated lands potentially affected by the proposed Project (e.g., SBCAG, ALUCP, etc.). CEQA does not require a lead agency to analyze such a project's consistency with the policies and programs of another jurisdiction that does not have any authority over implementation of the project. Similarly, projects within the City of Goleta's jurisdiction are not required to be evaluated for consistency with adopted plans and policies of the County of Santa Barbara. The absence of analysis of consistency with the City of Goleta's plans and policies, or the consideration of mitigation to ensure consistency with those plans and policies, does not make the analysis presented in this EIR inadequate.

Further, where relevant to the analysis of impacts associated with the proposed Project, the EIR does present discussion and programmatic analysis of potential impacts on resources within neighboring jurisdictions. In addition, as described in Section 3.0.6, *Cumulative Impact Analysis* and as required under CEQA, the EIR includes consideration and analysis of impacts associated with implementation of the proposed Project in conjunction with impacts associated with implementation of cumulative pending plans, programs, and projects. As presented in Table 3-6, the cumulative impact analysis includes consideration of the Housing Element Updates of each of the incorporated cities in the county, including the City of Goleta.

Comment Response A.2-3

The comment states that the "Impact Classification" column in Table ES-3 of the *Executive Summary* should be revised to reflect the impact classifications defined earlier in the chapter.

The impact classifications defined earlier in the *Executive Summary* chapter are presented for each impact in the "Residual Impacts" column in Table ES-3. These classifications align with those used in defining the significance of impacts in Chapter 3, *Environmental Impact Analysis.*

Comment Response A.2-4

The comment identifies minor textual errors in Table ES-3 in the *Executive Summary*. The text of Table ES-3 has been revised where appropriate to correctly list the impacts and impact classifications as identified in the resource sections in Chapter 3, *Environmental Impact Analysis.*

Comment Response A.2-5

The comment states that impact classifications for Impact AG-1, AG-2, and cumulative agricultural resource impacts are not consistent between Table ES-3 in the *Executive Summary* and Table 3.2-4 in Section 3.2, *Agricultural Resources.* However, both Table ES-3 and Table 3.2-1 correctly and consistently list the residual impact classifications for these impacts as "Significant and Unavoidable."

Comment Response A.2-6

The comment states that the impact classifications for Impact LU-2 and LU-3 must be listed as "Significant and Unavoidable" in Table ES-3 in the *Executive Summary.*

Table ES-3 correctly lists the residual impact classification for Impact LU-2 as "Significant and Unavoidable." However, with regard to Impact LU-3, as described in Section 3.10, *Land Use and Planning,* quality of life impacts can be broadly defined as the aggregate effect of a project's impacts on individuals, families, communities, and other social groups, and on how those groups function. They are social changes that result from a project, rather than physical effects on the environment. Quality of life impacts are typically subjective and not based on quantifiable measures. However, quality of life issues, while hard to quantify, are often of primary concern to the community affected by a project. The County's *Environmental Thresholds and Guidelines Manual* states that although changes to quality of life resulting from a project are not treated as significant effects on the environment pursuant to CEQA, many quality of life considerations are addressed in Comprehensive Plan policies, which are the subject of this section of the Program EIR. Therefore, given the County's *Environmental Thresholds and Guidelines Manual* treatment of quality of life effects, the EIR does not assign an impact classification to Impact LU-3. Where there is a physical effect on the environment that also affects quality of life, such as visual resources, noise, and traffic, impacts associated with these issue areas have been identified.

Comment Response A.2-7

The comment states that the impact classification for Impact LU-3 needs to be listed as "Significant and Unavoidable." Please refer to Comment Response A.2-6 above.

Comment Response A.2-8

The comment states that impact classifications for cumulative land use impacts are not consistent between Table ES-3 in the *Executive Summary* and Table 3.10-2 in Section 3.10, *Land Use and Planning.* However, both Table ES-3 and Table 3.10-2 correctly and consistently list the residual impact classifications for this impact as "Significant and Unavoidable."

Comment Response A.2-9

The comment states that impact classifications for Impact UWS-1 through UWS-4 are not consistent between Table ES-3 in the *Executive Summary* and Table 3.15-10 in Section 3.15, *Utilities and Water Supply.* However, both Table ES-3 and Table 3.15-10 correctly and consistently list the residual impact classifications for these impacts as "Significant and Unavoidable."

Comment Response A.2-10

The comment requests that the City of Goleta be included in Table 1-1 of Chapter 1, *Introduction* as an Other Interested Agency.

Table 1-1 has been revised to include the City of Goleta. The City of Goleta was included in noticing and opportunities to comment on the environmental review process, and no further consultation is required under CEQA.

Comment Response A.2-11

The comment states that the conversion of agricultural water to residential water for affordable housing projects and the transfer of water credits between properties could impact the City of Goleta's water resources. The comment further states that this is an impact that should be mitigated in the EIR.

Detailed discussion and analysis of the potential impacts on water supplies and infrastructure is provided in Section 3.15, *Utilities and Water Supply.* However, projects within the Goleta Water District receive water allocations from the Goleta Water District. The City of Goleta is not a water purveyor, nor a purveyor of water to any potential future projects enabled under the Housing Element Update. Goleta Water District has authority to determine water availability, water allocation, and water service for provisions for both the unincorporated county and City of Goleta. This EIR cannot require a mitigation measure for Goleta Water District to issue additional water allocations to the City as it is outside the lead agency's jurisdiction and beyond the scope of this EIR.

Comment Response A.2-12

The comment states that the EIR must include analysis of Program 16 of the Housing Element Update, asserting that this program is not described and analyzed adequately throughout the EIR. The comment further states that assumptions regarding the increase in development that Program 16 could lead to need to be described in more detail.

Program 16 is thoroughly described in Table 2-4 in Chapter 2, *Project Description* and is an aspect of the proposed Project, which is fully analyzed in this EIR. Actions identified for implementation under Program 16 are State-mandated actions. This program is designed to reduce governmental constraints to housing development. The increase in development this could lead to is associated with the worst-case buildout analyzed in the EIR, the assumptions of which are described in detail in

Chapter 3, *Environmental Impact Analysis.* The EIR includes thorough consideration and analysis of the potential changes in population that would result from implementation of Program 16, as well as other programs and elements of the proposed Project that contribute to the worst-case buildout scenario. As described therein, the Housing Element Update identifies several existing vacant sites, potential rezone sites, and pending project sites that are currently zoned as or are proposed to be rezoned to commercial uses (C-1 – Limited Commercial, C-2 – Retail Commercial, C-3 – General Commercial, and CM-LA – Community Mixed Use – Los Alamos). The Housing Element Update assumes these sites would be developed consistent with the County's development standards for mixed use development (Land Use and Development Code [LUDC] Section 35.42.200). In calculating the total capacity of residential development of these sites as mixed use projects, the maximum potential buildout scenario employed in the Program EIR assumes each site would be developed with 50 percent of the gross lot area as ground floor commercial uses, and up to two additional stories developed as residential uses, provided that the total gross floor area of residential uses shall not exceed the total gross floor area of the commercial use (e.g., 50 percent of the gross lot area). Based on the existing commercial and mixed use zoned sites included in the County's existing sites inventory, as well as the potential buildout of rezone properties, implementation of the proposed Project could accommodate an estimated 1,549,170.8 square feet of new ground floor commercial uses as part of mixed use development (see Table 3-4 in Section 3.0.3, *Impact Assessment Methodology*).

Comment Response A.2-13

The comment states that potentially reduced setbacks and increases in development area for the Design Residential (DR) zone could negatively impact aesthetics and visual resources within the City of Goleta.

Detailed discussion and analysis of potential impacts to aesthetics and visual resources, including impacts on resources in or near the City of Goleta, from reductions in setback requirements, increases in building heights, and reductions in open space, is provided in Section 3.1, *Aesthetics and Visual Resources.* Please refer to Impact AV-1.

Comment Response A.2-14

The comment states the EIR's analysis must include consideration of mixed-use development potential pursuant to Program 16. Please refer to Comment Response A.2-12 above.

Comment Response A.2-15

The comment states that the EIR must include clearer details on the community plan amendments that are needed to implement the proposed Project.

As described in Section 2.4, *Required Actions and Approvals,* as part of implementation of the proposed Project, the Board of Supervisors must adopt amendments to the Comprehensive Plan and community plans, as applicable, and the County's zoning ordinances to implement certain Housing Element Update programs, including changes to existing text and/or maps. Proposed community plan amendments would be generally limited to those necessary to enable zoning proposed as part of the sites inventory and Program 1 (Potential Rezone Program). Any amendments to community plans beyond these changes would not result in any adverse physical impacts on the environment beyond those described and analyzed in this Program EIR. Further analysis of any community plan amendments is not required.

Comment Response A.2-16

The comment states that the description of the buildout scenario does not reflect future development in the Project area and the summary omits consideration of projects within incorporated cities, including new housing projects as well as capital projects.

As described in Section 3.0.6, *Cumulative Impact Analysis* and as required under CEQA, the EIR includes consideration and analysis of impacts associated with the implementation of the proposed Project in conjunction with impacts associated with the implementation of cumulative pending plans, programs, and projects within the defined geographic area of the proposed Project, which consists of the unincorporated areas of the county. As presented in Table 3-6, the cumulative impact analysis includes consideration of the Housing Element Updates of each of the incorporated cities in the county, including the City of Goleta. However, pursuant to CEQA Guidelines Section 15130, the EIR's consideration and analysis of cumulative impacts is limited only to those projects with which the Project might cause a cumulatively considerable impact.

Comment Response A.2-17

The comment states that Chapter 3, *Environmental Impact Analysis* should be revised to describe issuance of the second NOP. While the issuance of a second NOP is already discussed in Chapter 1, *Introduction* (refer to Table 1-2), revisions have been incorporated in Chapter 3, *Environmental Impact Analysis*, on Page 3-4 to include discussion of issuance of the second NOP.

Comment Response A.2-18

The comment asserts that the EIR lacks explanation as to how **MM AV-1 (Objective Design Standards for Multiple-Unit and Mixed-Use Housing Projects)** would help to address public scenic vistas and visual resources or scenic qualities.

As described in Section 3.1, *Aesthetics and Visual Resources,* implementation of **MM AV-1** would help to ensure the protection of existing views and scenic resources, consistency with visual character, and consistency with visual resource policies by applying objective development standards in Section 35.31.020 of the LUDC to multifamily and mixed-use housing projects. These design standards are adopted by the County for the purpose of reducing or avoiding potential aesthetic and visual resources impacts from multifamily and mixed-use housing projects by ensuring visual compatibility and acceptable design of structures, visual screening, consistent form, landscape buffers, etc. However, implementation of this mitigation would not meet the basic project objectives, including the County's obligation to meet the state mandated RHNA. However, doing so would substantially reduce the flexibility for County decision-makers to meet the RHNA plus 15 percent buffer and affordability targets. Therefore, residual impacts would be *significant and unavoidable.*

Comment Response A.2-19

The comment asserts that the EIR must include additional mitigation to address impacts to surrounding community and scenic resources from light and glare and disagrees with the EIR's finding of insignificant for Impact AV-3.

As described in Impact AV-3, all future development enabled under the proposed Project would be required to comply with the lighting standards of County Code Chapter 35.30.120, *Outdoor Lighting*, which requires that lighting fixtures be installed, controlled, or directed so that the light would not

result in glare or otherwise be blinding to pedestrians or vehicular traffic or an adjoining property. For example, the zoning ordinance specifies that exterior lighting shall be hooded, and no unobstructed beam of exterior light shall be directed toward any area zoned or developed as residential. Additionally, light trespass and glare shall be reduced to the maximum extent feasible through downward directional lighting methods and shielding and shall be designed so as not to direct light or glare upward into the sky or interfere with vehicular traffic on any portion of a street. Compliance with these standards and regulations would ensure potential impacts from light and glare, including potential for spill over, would be minimized. Therefore, the EIR findings that impacts would be *insignificant are appropriate.*

Comment Response A.2-20

The comment states that the language of **MM BIO-2 (Habitat Protection Plan)** is subjective and unenforceable, and states that the language must be revised to ensure enforceability and protection of critical biological resources.

MM BIO-2 requires all qualifying ministerial projects to complete a Habitat Protection Plan in which a County-approved biologist will determine the presence, as applicable, of any sensitive biological resources of a site and determine appropriate mitigation necessary to minimize impacts associated with specific development of the site. Given the programmatic nature of the proposed Housing Element Update, the determination of site-specific mitigation is inappropriate. Further, given the requirement for County review and approval of the Habitat Protection Plan and measures identified by the County-approved biologist, the measure is enforceable and feasible. Lastly, future development would still be required to comply with applicable County policies requiring setbacks and buffers from creeks and other environmentally sensitive habitat, which will help to ensure that impacts to biological resources from future development are reduced to the maximum extent feasible.

Comment Response A.2-21

The comment states that compensatory measures should not be included in **MM BIO-2** and that if a project cannot avoid impacts, project designs should be reconsidered.

The comment has been noted and will be forwarded to County decision makers for their consideration.

Comment Response A.2-22

The comment states that the language of **MM BIO-2** is subjective and unenforceable, and states that the language must be revised to ensure enforceability and protection of critical biological resources.

Please refer to Comment Response A.2-20.

Comment Response A.2-23

The comment states that the EIR must include mitigation requiring revisions to relevant policies of the Eastern Goleta Valley Community Plan and Goleta Community Plan to ensure their application to ministerial projects to reduce impacts to creeks.

However, as described in Section 3.4, *Biological Resources,* future development enabled under the proposed Project would be subject to compliance with applicable policies and requirements of the County's Comprehensive Plan and community plans, including creek setbacks. Policies such as creek

setbacks which are objective and quantifiable would apply to ministerial projects regardless of if a policy states this. Policies would still apply to the ministerial projects to the extent permitted by state law. No additional mitigation is required to ensure projects comply with policies addressing creek setbacks. Revisions to discussion of Impact BIO-4 in Section 3.4, *Biological Resources* have been incorporated to provide clarification regarding standards for protection of biological resources and setbacks from creeks which are included in local policies, regulations, or plans, such as Chapter 15B of the County Code, the Coastal Land Use Plan (CLUP), the 1993 Goleta Community Plan, and the 2015 Eastern Goleta Valley Community Plan. Specifically, revisions have been made to clarify that such standards include minimum quantified creed setbacks (i.e., 50 to 100 feet) from the top of the bank of creeks.

Comment Response A.2-24

The comment states that **MM HAZ-3 (Compliance with ALUCP Density and Open Land Requirements)** should be revised to apply to all residential and mixed-use development projects under the Housing Element Update and to ensure new development complies with the entirety of the applicable ALUCP. However, ALUCP requirements apply to all projects within a qualifying safety zone area. As described in Impact HAZ-4 in Section 3.8, *Hazards and Hazardous Materials,* by-right development enabled under Program 2 (Use-by-Right Approval) may not be subject to discretionary review by the County, and applicants could potentially be allowed to build to the maximum allowable density within their zoning. Therefore, **MM HAZ-3** is identified to ensure these projects are developed consistent with ALUCP standards. Other housing projects that continue to be subject to discretionary review would automatically be subject to compliance with ALUCP standards.

The comment further states that **MM HAZ-3** should be revised to acknowledge the need for projects to comply with FAA requirements, including Part 77. Discussion in Impact HAZ-4 has been revised to include discussion of mandatory compliance with FAA regulations, including Part 77 of the Code of Federal Regulations, as shown on page 3.8-36.

With regard to comments noted required edits to Figures 7 and 24 of the Eastern Goleta Valley Community Plan, these comments have been noted and will be forwarded to County decision makers for their consideration.

Comment Response A.2-25

The comment states that Section 3.10, *Land Use and Planning* does not address the environmental setting of the City of Goleta or consistency with City of Goleta policies.

Please refer to Comment Response A.2-2.

Comment Response A.2-26

The comment states that the analysis under Impacts LU-2 and LU-3 does not disclose the findings of significance for these impacts.

Discussion under Impact LU-2 does disclose the findings of significance for this impact. With regard to Impact LU-3, please refer to Comment Response A.2-6.

Comment Response A.2-27

The comment states that Impact LU-2 and Table 3.10-3 in Section 3.10, *Land Use and Planning* must include analysis of Policies TC-EGV-1.1 and TC-EGV-1.2 of the Eastern Goleta Valley Community Plan. Policy TC-EGV-1.1 establishes minimum LOS standards for roadways within the Eastern Goleta Valley. As discussed in Section 3.14, *Transportation,* the County and CEQA Guidelines Section 15064.3(a) no longer consider automobile delay or congestion an environmental impact. Impact LU-2 addresses land use threshold (b) of the CEQA Guidelines Appendix G; specifically, whether a project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Due to updates to the CEQA Guidelines and SB 743 to revise criteria for determining what constitutes a significant transportation-related environmental impact and shift from LOS-based metrics (i.e., vehicle delay) to VMT, policies addressing LOS are not included in the analysis of potential land use and transportation impacts, as potential conflicts with these policies may no longer be used in the determination of impacts of a project.

With regard to consideration of TC-EGV-1.2, this policy states that the Circulation Element and implementing Transportation Improvement Plan shall include long-term improvements to multimodal transportation facilities. The proposed Project is an update to the Housing Element and associated goals, policies, and programs. Therefore, this policy is not applicable to the proposed Project.

With regard to request for inclusion of mitigation requiring a Memorandum of Understanding (MOU) with the City of Goleta, the proposed Project involves the implementation of a land use plan and policies that would facilitate future residential development in a manner necessary to meet the County's RHNA plus the 15 percent buffer for lower- and moderate-income households. It is not within the scope of this EIR to identify or require modifications to any existing revenue sharing agreements or MOUs for the share of cost of services and improvement, or require the establishment of new agreements. Future development would be required to pay County development impact mitigation fees, which are intended to fund fair share contributions towards regional infrastructure and facility improvements resulting from the increased demand for these services. Just as a housing project in the City of Goleta pays transportation impact mitigation fees to the City and not the County, the same holds true for projects in the County. Additionally, housing projects would be required to construct necessary roadway and intersection improvements to serve the project. These improvements commonly include sidewalks and bicycle lanes, additional travel and turning lanes, intersection signalization and timing changes, pedestrian crossings, street lighting, and signage. These improvements have the potential to serve and/or extend into adjoining jurisdictions.

Comment Response A.2-28

The comment asserts that Impact LU-2 and the discussion of policy consistency in Table 3.10-3 is inadequate because of a lack of reference to and analysis of policies of the Goleta Community Plan.

Impact LU-2 and the discussion of policy consistency in Table 3.10-3 has been revised to include discussion of consistency with select policies of the Goleta Community Plan that remain applicable to unincorporated lands within the Goleta Community Plan boundary. Inclusion of discussion of consistency with these policies does not change the significance findings of Impact LU-2 or necessitate the inclusion of any new mitigation. However, it should be noted that the Goleta Community Plan is

largely inapplicable and outdated, due to the subsequent incorporation of the City of Goleta, and many policies would no longer apply to the proposed Project.

With regard to request for the inclusion of mitigation requiring a MOU with the City of Goleta, please refer to Comment Response A.2-27.

Comment Response A.2-29

The comment asserts that Impact LU-3 must be revised to include acknowledgement of transportation impacts on local roadways.

However, discussion of transportation impacts is provided in Section 3.14, *Transportation.* The analysis provided therein evaluates potential physical impacts of transportation consistent with CEQA and County thresholds and guidelines for analysis of transportation impacts. This analysis includes consideration of some local roadways, such as Patterson Avenue in the City of Goleta, which provide an example of the potential programmatic impacts associated with the proposed Project.

Comment Response A.2-30

The comment asserts that **MM LU-1 (Additional Allowed Uses in Design Residential [DR] Zoning)** is too broad in scope and vague to the point that implementation of the mitigation measure may result in significant and unavoidable impacts. The comment provides recommended revisions to **MM LU-1**, including revisions to limit potential for impacts resulting from the allowance for neighborhood-serving commercial uses.

However, the purpose of commercial allowances on DR under the zoning ordinance amendments is meant to provide resident-serving convenience stores and minor commercial uses to reduce traffic/VMT by providing onsite services for residents. Similar allowances are provided for other zoning designations within the County's zoning ordinances, such as the Planned Residential Development (PRD) zone, and were determined to be consistent with or applicable for inclusion in the DR zone as a means to ensure consistency with County Comprehensive Plan policies, and reduce potential impacts associated with development of proposed DR zone sites. It is speculative to suggest that allowances provided in **MM LU-1** would result in significant commercial development or loss of housing for sites that housing owners may convert to neighborhood-serving commercial. In developing this mitigation, the County has determined that there has been no indication or history of this happening in zones where such uses are currently allowed. Further, the applicability of **MM LU-1** is highly focused, as it would apply only to sites proposed for DR, all of which in the sites inventory are proposed to be zoned DR with a minimum density of 20 du/ac or more. In order for future applicants to develop these sites, projects would still be required to meet minimum residential density, making the potential displacement of residential units, uses, or people as a result of these allowances unlikely, but also highly speculative. Minor changes to **MM LU-1** have been included to ensure the language is sufficient, enforceable, and would not result in any significant secondary impacts.

Comment Response A.2-31

The comment asserts that the analysis of secondary impacts for **MM LU-1** are purely speculative. Please refer to Comment Response A.2-30.

Comment Response A.2-32

The comment states that the analysis presented in Impact LU-3 does not explain whether or not impacts are considered significant. Please refer to Comment Response A.2-6.

Comment Response A.2-33

The comment asserts that the analysis presented in Impact PH-2 must consider the impact of allowing commercial development within the DR zone district and the impacts that could have on displacement of people and housing.

Please refer to Comment Response A.2-30.

Comment Response A.2-34

The comment asserts that the EIR must include a new mitigation measure requiring the County to provide funding for Fire Station No. 10 due to the likely increase in demand for services. However, the City of Goleta does not have an independent fire department and contracts firefighting services from the Santa Barbara County Fire Department (SBCFD). While the County understands that Fire Station No. 10 has been planned for and will be developed under an existing MOU between SBCFD and the City of Goleta, it is beyond the scope of this Program EIR to require an additional MOU as mitigation or revise an existing MOU between SBCFD and the City of Goleta. Please also refer to Comment Response A.2-27.

The County's Code of Ordinances currently includes an impact mitigation fee for new development projects within the SBCFD service area. The fee is needed to finance fire facilities, apparatus, and equipment necessary to serve new development and to assure new development projects pay their fair share for these facilities. These fees are outlined in the County's Development Impact Mitigation Fee Program and are required to be paid on or before the final building permit inspection. Thus, any projects enabled under the County's Housing Element Update would be required to pay development impact mitigation fees which include provision to SBCFD, which uses collected fees to fund fire services, including facility and operation of Fire Station No. 10.

While the timing of any additional improvements for which fees have been collected would be determined at the discretion of SBCFD, as part of development of individual sites enabled under the Housing Element Update, SBCFD conducted a preliminary review of proposed housing sites and would review them again as part of development applications to ensure adequate services can be provided. As part of its preliminary review, SBCFD has not indicated that Fire Station No. 10 must be developed prior to development in Rezone Site Nos. 1-7 and 11 in order to meet service ratios/response times as several existing fire stations are located in close proximity and are able to serve these sites.

Comment Response A.2-35

The comment asserts that the EIR must include a new mitigation measure requiring the County to provide the City of Goleta with park and Quimby Act fees, where applicable, to reduce impacts associated with increased use and demand for City of Goleta parks.

Please refer to Comment Response A.2-27 Further, the City of Goleta currently has no obligation to pay fees to the County for offsetting the impacts of projects within the City of Goleta that cause impact

on County resources or facilities, such as parks, nor has the City of Goleta offered such an opportunity through environmental review of the City of Goleta's Housing Element Update.

Comment Response A.2-36

The comment states that Table 3.14-4 in Section 3.14, *Transportation* should be revised to include Annual Average Daily Trips (AADT) for north-south corridor roadways within the City of Goleta that may be affected by future development of the County's Housing Element Update.

These requested revisions have been made to Table 3.14-4 and other appropriate discussions in Section 3.14, *Transportation.*

Comment Response A.2-37

The comment states that Section 3.14, *Transportation* does not address the environmental setting of the City of Goleta or consistency with City of Goleta policies.

Please refer to Comment Response A.2-2.

Comment Response A.2-38

The comment states that Section 3.14, *Transportation* must include consideration and analysis of policies of the Eastern Goleta Valley Community Plan and Goleta Community Plan addressing LOS.

Please refer to Comment Response A.2-27.

Comment Response A.2-39

The comment states that because the proposed Project would impact City of Goleta streets, bicycle paths, and sidewalks, the summary of Local Policies in Section 3.14.3.3, *Local* must be revised to include mention of City of Goleta General Plan / Coastal Land Use Plan Transportation Element LOS standards.

Please refer to Comment Response A.2-2.

Comment Response A.2-40

The comment states that Impact T-1 in Section 3.14, *Transportation* does not address consistency with City of Goleta policies. Please refer to Comment Response A.2-2.

With regard to request for inclusion of mitigation requiring a MOU with the City of Goleta, please refer to Comment Response A.2-27.

Comment Response A.2-41

The comment asserts that the analysis presented in Impact T-3 in Section 3.14, *Transportation* is inadequate because it does not include analysis of impacts to City of Goleta streets or consideration of planned City of Goleta Capital Improvement Projects, such as the Hollister Avenue striping project and State Route (SR) 217 ramp roundabouts. However, given the programmatic nature of the proposed Project and uncertainty regarding the size and location of future development, the EIR cannot feasibly evaluate potential impacts on all potentially affected roadways. Detailed discussion of the methodology utilized in assessing impacts under Impact T-3 is presented in the discussion of

Design Features and Hazards in Section 3.14.4.1, *Thresholds of Significance.* As discussed therein, the impact analysis does not evaluate individual potential geometric design features or incompatible use hazards at a project- or site-specific level. Rather, the analysis provided by this Program EIR programmatically addresses the potential for the Housing Element Update to result in temporary construction-related roadway hazards such as conflicts between vehicles, bicycles, and pedestrians. Additionally, this analysis programmatically evaluates whether there would be long-term operational hazards related to design features such as curved streets with inadequate sight distances, unsafe separation of vehicle, bicycle, and pedestrian traffic, or inadequate pedestrian facilities (e.g., incomplete sidewalks, lack of striped pedestrian crossings). This analysis considered existing roadway configurations based on a review of aerial imagery as well as existing and future AADT along existing roadways.

With regard to the data presented in/referenced from Appendix E, data presented in this appendix is intended to support an illustrative analysis of potential impacts of the proposed Project. This data is not intended to supplant the need for an operations transportation study. The EIR uses the data cited in the noise analysis as a basis to demonstrate where increases in traffic volumes may cause geometric and safety issues, not exceed roadway operational design standards (i.e., LOS standards). As described in Comment Response A.2-27, the County and CEQA Guidelines Section 15064.3(a) no longer consider automobile delay or congestion an environmental impact. As such, the EIR cannot consider roadway capacity analysis; however, increases in traffic may be considered in the analysis of potential geometric and safety impacts. Based on the examples and analysis provided in Impact T-3, implementation of the Project is considered to result in potentially significant impacts, and **MM T-3 (Funding and Mitigation Fee Programs Update)** is identified and required to reduce impacts to a *significant but mitigable* level. **MM T-3** as proposed references updates to the plans and programs for which the County has discretion/authority over. Inclusion of requirements to address City of Goleta plans and projects, as requested by the comment, would make the proposed mitigation infeasible, as the County would have no legal authority to impose such requirements over plans and projects applicable to another jurisdiction.

Comment Response A.2-42

The comment requests revisions to **MM T-3 (Funding and Mitigation Fee Programs Update)** to include the requirement for establishment of an MOU with the City of Goleta.

Please refer to Comment Response A.2-27.

Comment Response A.2-43

The comment asserts that **MM T-1 (Site-based Transportation Demand Management [TDM])** as currently written is subjective and unenforceable for ministerial projects. The language presented in **MM T-1** has been revised, as recommended in the comment.

Comment Response A.2-44

The comment states that **MM T-1** must include reference to the City of Goleta planned bicycle infrastructure.

However, as previously described, the proposed Project involves implementation of a land use plan and programs to facilitate development of housing on sites within unincorporated lands throughout the County. As such, the County does not have any discretion to require applicants for development

of sites to implement improvements outside of the County's jurisdiction. Please refer to Comment Response A.2-27.

Comment Response A.2-45

The comment requests revisions to the transportation impact analysis to include the requirement for establishment of an MOU with the City of Goleta. Please refer to Comment Response A.2-27.

Comment Response A.2-46

The comment asserts that mitigation measures identified in Section 3.14, *Transportation* does not adequately address the need for safety improvements, and states that additional mitigation must be added to address safety improvements at the intersections of streets located within or at the boundary of the City of Goleta.

However, mitigation requiring updates to the County's funding and mitigation fee program (**MM T-3**) do not need to include City of Goleta improvement needs. As previously described, the proposed Project involves implementation of a land use plan and programs to facilitate development of housing on sites within unincorporated lands throughout the County. As such, the County does not have any discretion to require applicants for development of sites to implement improvements outside of the County's jurisdiction. **MM T-3** as proposed references updates the to the plans and programs for which the County has discretion/authority over. Inclusion of requirements to address City of Goleta plans and projects, as requested by the comment, would make the proposed mitigation infeasible, as the County have would no legal authority to impose such requirements over plans and projects applicable to another jurisdiction. Please refer to Comment Response A.2-27 and A.-41. This comment has been noted and will be forwarded to County decision makers for their consideration.

Comment Response A.2-47

The comment states that **MM T-3** needs to provide for inclusion of the City of Goleta in the process and to create a mechanism to provide support for the City of Goleta to update and implement Capital Improvement Projects to accommodate increased demand for City of Goleta transportation facilities. Please refer to Comment Response A.2-27 and A.2-46.

Comment Response A.2-48

The comment states that **MM T-3** needs to include consideration of the improvements needed in the City of Goleta.

Please refer to Comment Response A.2-27 and A.2-46.

Comment Response A.2-49

The comment states that the timing of **MM T-3** must be brought forward, asserting that the timing as currently outlined in the mitigation cannot reduce Impact T-3 to a potentially significant but mitigable level.

The timing of the proposed mitigation is adequate to reduce impacts of the proposed Project. While the updated fee program would not take effect until sometime within 2 years of Housing Element Update adoption, all projects and development applications processed prior to completion of the funding and mitigation fee program updates would continue to be subject to the County's existing fee

programs. Additionally, most of the larger housing projects will not have advanced far enough through the entitlement process in the next two years to have paid fees prior to the fee update.

Comment Response A.2-50

The comment states that Table 3.15-10 in Section 3.15, *Utilities and Water Supply,* must be updated to accurately reflect the severity of impacts analyzed in the section.

Table 3.15-10 currently accurately reflects the impact classification, required mitigation measures, and residual significance classification as described for each impact in Section 3.15.4.2, *Project Impacts.* As presented therein, Project-specific impacts to utilities and water supply described in Impact UWS-1, Impact UWS-2, Impact UWS-3, and Impact UWS-4, as well as cumulative impacts to utilities and water supply, are identified as *significant and unavoidable*.

Comment Response A.2-51

The comment states that the language of **MM WF-1 (Onsite Defensible Space Requirements)** must be revised to ensure the mitigation is objective in nature and applicable, and provides recommended edits to the mitigation language.

However, the mitigation, as currently drafted, is already objective in nature and applicable. Nevertheless, this comment has been noted and will be forwarded to County decision makers for their consideration.

Comment Response A.2-52

The comment asserts that the EIR's alternatives analysis presented in Chapter 4, *Alternatives Analysis,* must include additional feasible alternatives that meet the project objectives. The comment recommends alternatives that consider other approaches to meet the RHNA, such as alternatives that involve further supporting infill redevelopment, incentivizing ADUs to the greatest extent feasible, and changing the affordability assumptions for rezone sites to count all units towards lower- and/or moderate-income.

As described in Chapter 4, *Alternatives Analysis,* CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project that would avoid or substantially reduce the significant impacts while accomplishing all or most of the project objectives. CEQA Guidelines Section 15126.6 further states that an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

The EIR presents consideration of eight separate alternatives to the proposed Project, including a No Project Alternative. Of these eight alternatives, three alternatives were discarded from further analysis due to failure to meet Project objectives, and five alternatives were carried forward for full analysis and comparison to the proposed Project. Excluding the CEQA-mandated No Project Alternative, the EIR thus presents a meaningful analysis of four separate alternatives. Therefore, further consideration of additional alternatives is not required. Nevertheless, these comments will be forwarded to County decision-makers for further consideration in the selection of rezone sites. However, it should be noted that with regard to consideration of an alternative that would change affordability assumptions for rezone sites, changing the affordability assumptions to 100 percent

affordable is not considered realistic. As such, such an alternative would not feasible meet the project objectives.

Comment Response A.2-53

The comment expresses concern regarding use and consideration of sites in the County's Balancing Act Housing Simulation tool.

However, the Balancing Act Housing Simulation Tool is a separate tool developed by the County to facilitate public input regarding selection of potential rezone sites. It should be noted that the Balancing Act Housing Simulation Tool is updated on a regular basis based on new information that comes in. The Balancing Act Housing Simulation Tool is not a component of this EIR and does not directly relate to the EIR's analysis of impacts associated with the proposed Project or its alternatives. Nevertheless, these comments have been noted and will be forwarded to County decision-makers for consideration.

CRAHTAC

COUNTY RIDING AND HIKING TRAILS ADVISORY COMMITTEE

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February 9, 2024

Submitted via email

Ms. Hannah Thomas, Planner
Planning and Development Department
123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Draft Housing Element Environmental Impact Report

Dear Ms. Thomas:

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) wishes to provide the following comments on the adequacy of the public draft Environmental Impact Report EIR) for the County's Housing Element. CRAHTAC finds that the EIR needs to be improved as it:

- Lacks adequate discussion of the importance of and analysis of impacts to the County's public trail system.
- Employs narrow thresholds of significance that undervalue the importance of parks, recreation, and trails to public health and welfare.
- Does not appear to discuss the County's Parks, Recreation and Trails Maps (PRT Maps), a primary County land use tool for planning for and acquiring new parks, recreation and trails.
- Does not appear to discuss the land use impacts associated with rezoning sites from the Planned Residential Development designation, the primary tool by which the County has acquired almost all new urban area parks, recreation and trails over the last 30-40 years.
- Does not appear to discuss the impacts of Housing Elements' proposed reductions in Park Development Impact Fees, potentially seriously undermining the County's ability to acquire new parks, recreation, and trails to serve new development.
- Fails to identify and provide adequate mitigation measures to address potentially significant impacts on parks, recreation, and trails.

A.3-1

These matters are discussed briefly below.

CRAHTAC is a standing committee appointed by the Board of Supervisors to advocate for recreational trails and advise the County on matters related to recreational trails issues. CRAHTAC is composed of three or four members from each supervisorial district and is recognized by the County as having a key role in advising on issues surrounding trails, particularly projects with impacts to trails and related mitigation measures. Consistent with our role advising the County on trail issues, CRAHTAC believes that the Housing Element EIR requires substantial changes to adequately address project

impacts related to Land Use (Section 3.13) and Public Services (Section 3.13). CRAHTAC would like to emphasize that we understand the need for and importance of affordable housing, and our concerns are not about growth vs no growth. We make these suggested changes to the EIR to ensure that the EIR is made a more useful tool to help the County develop balanced, sustainable, complete communities that provide affordable housing and new parks, recreation, and trails. Such public recreation is a basic social equity and environmental justice issue. It will be essential for the health and welfare of both new residents, particularly low- and moderate-income households, and existing residents as well. Below are specific comments and requested changes to provide a legally adequate analysis of park, recreation, and trail issues. A.3-1 Cont.

Section 3.10. Land Use and Planning:

Regulatory Setting

Page 3.10-14; Land Use Element: Please add a discussion of the County's **Parks, Recreation and Trails Maps** (PRT Maps) to the Land Use element discussion, including relevant language from the back of the maps (e.g., trail acquisition and design), to the Comprehensive Plan section. The PRT Maps are an adopted part of the County's Comprehensive Plan and are a key vehicle for acquiring parks, recreation, and especially trails. The lack of discussion is a major oversight of a key recreational planning tool. A.3-2

Page 3.10-15; Open Space Element Please add the discussion from the open space Element regarding the importance of open space for outdoor recreation, which identifies such open space as a high priority. A.3-3

Page 3.10-16: Eastern Goleta Valley Community Plan: This discussion fails to identify the high priority placed on providing public parks, recreation, and trails in the Eastern Goleta Valley Community Plan. Such information is critical to support impact analysis as this community is where the Housing Element proposes the majority of new growth (e.g., San Marcos and S. Patterson Agricultural Area rezones) and where demand for parks, recreation, and trails will be the highest. Please add a new sentence near the end of this discussion that states: "The Eastern Goleta Valley Community Plan contains multiple goals and policies related to the provision of public parks, recreation, and trails as part of new development and also includes proposed expansion of the County's public hiking trail system into the Santa Ynez Mountains to address long-standing community needs and increased demand associated with new development." A.3-4

Page 3.10-16: 1993 Goleta Community Plan: This discussion fails to identify the high priority placed on providing public parks, recreation, and trails in the 1993 Goleta Community Plan. Such information is critical to support impact analysis as the proposed Glen Annie Golf Course rezone is located within this area, which proposes as many as 1,500 or more new homes as well as new growth in or near Isla Vista with associated demand for new public parks, recreation, and trails. Perhaps more importantly, the Glen Annie Golf Course conceptual development plan would provide the only public recreation proposed as part of any new housing rezones or development in the entire County that we are aware of, with a new community park, pool, pickleball courts and 4 miles of public hiking A.3-5

trails. Please add a new sentence near the end of this discussion, which states: "The 1993 Goleta Community Plan contains multiple goals and policies related to the provision of public parks, recreation, and trails as part of new development. This plan also includes proposed expansion of the County's public hiking trail system as identified in the Goleta Trails Study into the Santa Ynez Mountains to address long standing community needs and increased demand associated with new development." A.3-5 Cont.

Page 3.10-17: Orcutt Community Plan: This discussion fails to identify the high priority placed on providing public parks, recreation, and trails in the Orcutt Community Plan. Indeed, this plan provides the most comprehensive update to the County's PRT maps of any community plan with an extensive trail system and multiple new parks. Such information is critical to support impact analysis as several proposed rezone sites are located within this community area with hundreds of potential new homes with associated demand for new public parks, recreation and trails. Please add a new sentence near the end of this discussion that states: "The Orcutt Community Plan contains multiple goals and policies related to the provision of public parks, recreation, and trails as part of new development and includes a detailed PRT Map of extensive new trails as well as proposed public parks, including the Orcutt Creek Trail, trails in urban areas and new Orcutt Hills Trails. " A.3-6

Page 3.10-20; County Zoning Ordinances Santa Barbara County Land Use and Development Code: Please discuss the details of the Planned Residential Development (PRD) zone district as it relates to open space, parks and recreation, and the County's recreation overlay. Discussion of the PRD zone is particularly important to support impact analysis of proposed rezones from the PRD to the DR zoning as it has been the primary vehicle by which the County has acquired virtually almost all its urban area open space and parks recreation and trails over the last 30-40 years and rezoning of sites without employing this zone will seriously undermine the provision of public recreation. A.3-7

Please also add a discussion of the County's existing Recreation Overlay, which is important as key Housing Element sites, such as the Tatum property within the San Marcos Agricultural area, are designated with this Overlay. Yet, no public recreation has been proposed as part of the development of that site. A.3-8

In summary, economic and social changes resulting from a project are not treated as "significant effects on the environment" pursuant to CEQA if there is no resulting physical change to the environment. However, they may be considered when determining the significance of a physical change to the environment, and physical changes resulting from the economic and social changes should be evaluated in CEQA environmental documents. A.3-9

Page 3.10-20; Section 3.10.4.1: Thresholds of Significance: We note that the discussion here regarding quality-of-life thresholds appears to use outdated standards. In 2020, it appears that the Planning Commission (7/29/2020) and Board of Supervisors 9/15/2020) adopted amended quality-of-life thresholds as summarized in this excerpt below: A.3-10

> *"Quality of life impacts should be addressed on a case-by-case basis, depending on the unique circumstances of a given project. Quality of life impacts may not be relevant to all projects*

and may not be applicable to all environmental analyses. However, when quality of life impacts are considered, the environmental document should clearly state the causal relationship between the change to quality of life and the corresponding physical impact, and the significance of the physical impact. Furthermore, if changes to quality of life are used to assess the significance of a physical impact to the environment, the environmental document should clearly identify the physical impact, the resulting change to quality of life, and the severity of the change to quality of life (ideally using a quantitative method, if available). In all cases, the analysis must be supported by substantial evidence set forth in the environmental document."

A.3-10 Cont.

If this standard is indeed in effect, the EIR should thoroughly discuss the physical environmental impacts of the proposed project related to quality-of-life issues, including physical impacts to public health and welfare from lack of recreation and the physical deterioration of public parks, recreation, and trail due to increased overcrowding and deterioration of the physical quality of parks and trails. We note that the Board of Supervisors has recently recognized that the provision of public parks and trails is essential to public health and welfare (existing and future residents are part of the environment) and that the provision of such public recreation has been selected as one of the rezone site selection criteria to be used by the County in rezone site selection.

Impact LU-2: Please discuss the impact associated with increased demand for trails within this impact as they relate to adopted County policies and the County's Parks Recreation and Trails Maps, part of the County's adopted Comprehensive Plan. Please see our comments on Pages 3.13-21: Existing Recreation Service Levels, where CRAHTAC recommends that the County adopt a minimum trail service standard of 2.0 miles per 1,000 new residents with a goal of providing 6.4 miles of trails per 1,000 new residents and add such discussion throughout this impact. Please incorporate this or other available trail service standards into this analysis.

A.3-11

Pages 3.10-28-3.10.60; Table 3.10-3.

Policy LUA-EGV-1.6: Please identify the project as potentially inconsistent with the recreation planning sections of this policy. The lack of any recreation planning for these areas will make it extremely challenging to acquire new public parks, recreation, and trails as required by this policy.

A.3-12

Land Use Development Policy 4: Please amend the text to address how the County will ensure the provision of adequate public services for parks, recreation, and trails, particularly given the proposed reductions in open space requirements, fee reductions, and lack of any recreation planning for any of the rezone sites. The County simply does not have plans in place to provide roughly 84 to 180 acres of new parks and perhaps 36 to 108 miles of new trails (see comments in public services for service metrics for parks and trails). Further, while the County could potentially provide such facilities with good community planning, the EIR's mitigation measure for parks, recreation, and trail impacts is utterly lacking in specificity or requirements for the County to take well-planned action to create such facilities, fundamentally undermining the conclusions of the EIR. Therefore, the project would appear to be potentially inconsistent with Land Use Development Policy 4.

A.3-13

Please add the following policies to this table and discuss potential project inconsistency:

Policy PRT-EGV-1.2: To enhance overall public health and well-being, recreation facilities shall be located, designed, and constructed, as needed, to increase opportunities to play and exercise in Eastern Goleta Valley.

Policy PRT-EGV-1.3: New public recreational resources shall be prioritized for underserved locations to increase equitable access to a range of recreation opportunities.

Policy PRT-EGV-1.4: The County shall prioritize locating recreational resources in areas within walking or biking distance of residential and educational land uses.

A.3-14

Page 3.10-61-63; Impact LU-3: If the above referenced new quality of life threshold is indeed in effect, please revise and update Impact LU-3 to comport with this new threshold, in particularly by thoroughly addressing physical impacts to public health and welfare and the effect of deterioration of public recreation facilities on existing and future residents.

A.3-15

Page3.10-63; Section 3.10.4.3: Cumulative Impacts: Please discuss the cumulative impacts on County parks, recreation, and trails, including quality of life and policy consistency issues discussed above, of planned development of 20,000 new homes with 60,000 residents in the County's eight cities. Parks such as Orcutt Community Park are regional facilities that could suffer physical deterioration from increased use associated with cumulative development as well as quality of life impacts to County residents. In particular, most recreation trails are located in County unincorporated areas and as such will be disproportionately impacted by such cumulative development. **Page 3.10-64-65; Section 3.10.4.4 Proposed Mitigation; MM LU-1. Additional Allowed Uses in Design Residential (DR) Zoning.** This mitigation measure is completely inconsistent with requirements as set forth in CEQA Section 15126.4 as well as those mitigation measures provided in other EIR Sections. The mitigation measure does not commit the County as Lead Agency to any specific actions and uses the term may, never applied in mitigation measures under CEQA and completely inconsistent with the CEQA standards discussed below. Mitigation measures for potentially significant effects are required to use the term "***shall***" to commit the responsible party to implementation. This measure requires no set actions of the County to address impacts to public recreation. Mitigation measures for significant impacts throughout the EIR typically use the term shall and not the term "***may***." This measure needs to be completely rewritten to comport with the requirements of CEQA Section 15126.4 and to make it explicit that the County shall amend the DR zone district to **require** the provision of public parks, recreation, and trails and/ or employ the PRD zone district to achieve the same performance standard. The measure does nothing to mitigate the increased demand for roughly 85 acres of new public parks under existing outdated 44-year-old County standards of 4.7 acres/ 1,000 residents or the modern National Parks and Recreation Association recommended standard of 10.7 acres of developed parkland / 1,000 residents (or roughly 193 acres of new parks). The measure also does nothing to address the substantially increased demand for new public trails (the most popular form of recreation in the County), which CRAHTAC recommends be based on minimum trail service levels in Orcutt of 2 miles per 1,000 residents (or roughly 36 miles of new trails) or under the "gold

A.3-16

standard" of trail service ratios in Montecito -Summerland of 6 miles per 1,000 residents (or 108 miles of new trails). We note that CEQA Section 15126.4 requires that the agency:

1. Commit itself to mitigation.
2. Adopts specific performance standards the mitigation measure will achieve
3. Identifies the type(s) of potential actions (s) that can feasibly achieve the performance standard…

The existing mitigation measure meets none of the legally required tests, commits the County to nothing, and leaves these significant impacts unmitigated even though it is well within the County's ability to wholly or partially mitigate such impacts through required development exactions, changes to zone districts, or other measures.

We suggest rewording this mitigation measure as follows:

The County shall amend section 35.23.020 – Purposes of the Residential Zones for the DR Zone District to read: "This zone is intended to ensure comprehensively planned and well-designed residential development **to ensure the provision of affordable housing as well as public parks, recreation and trails**, while allowing flexibility and encouraging innovation and diverse design to ensure provision of affordable housing, and requiring that substantial open space be maintained within new residential developments, **particularly for provision of new public parks, recreation and trails in order to provide recreational opportunities for use by both the residents of the site and the public (bolded font indicates new language).**

Further, this measure should specify that no further reductions in required open space beyond the reduction to 30% already permitted would be permitted absent the dedication of significant onsite public recreation facilities. See also other recommended mitigation measures in the public services section comments.

A.3-16 Cont.

If the DR zone District is to replace the PRD zone district as the planning tool for most new housing development, CRAHTAC also recommends that this mitigation measure require major amendments to the DR Zone District to include details on the provision of public open space, parks, recreation, and trails.

A.3-17

Please include a new mitigation measure that requires updating the county's PRT Maps as part of the rezone process as follows: Recommended new Land Use Mitigation Measure MM LU-2: *Concurrent with any proposed Housing Element rezones, the County shall amend the PRT maps to include new proposed parks, recreation and trails on such sites to improve the consistency of the Housing Element with adopted County policies and to partially mitigate the impacts of the increased demand for public recreation from new residents.* To ensure implementation under "by right" or builders remedy projects, the County shall amend the zoning ordinance to include the PRT map revision recommendations described as quantified objective standards, utilizing the Recreation Overlay or inserting site-specific development standards into the zoning ordinance.

A.3-18

CRAHTAC also recommends the addition of an amended Land Use Impact as follows: Impact LU-2: The proposed project would create potentially significant land use impacts due to inconsistencies with County policies such as Land Use Development Policy 4 and Policy PRT-EGV-1.2, PRT-EGV-1.3, and PRT-EGV-1.4, with associated adverse impacts to the public health and welfare. A.3-19

CRAHTAC would like to note that the proposed project could create substantial conflicts with adopted County policies regarding public services and recreation without any updated planning for providing parks, recreation, and trails. Public parks, recreation, and trails are clearly an essential public service under Land Use Development Policy 4, and multiple County policies require new public parks, recreation, and trails, such as those from the Eastern Goleta Valley Community Plan. The existing County Park Development Impact Fee ordinance identifies parks, recreation, and trails as essential for public health and welfare. In addition, the recent presentation from the Office of the County Executive for the Board of Supervisors Housing Element hearing of 1/9/2024 cites the Trust for Public Lands detailing the known public health and welfare and social equity benefits of public parks, recreation, and trails. CRAHTAC is concerned that in rejecting the use of the PRD zone district, potentially lowering open space and park fee requirements, the Housing Element would significantly undermine key County tools for acquiring parks, recreation, and trails, with associated land use policy and public health and welfare impacts. Such new planning can certainly be accomplished within the context of the housing Element and thus constitutes a feasible mitigation measure that must be considered by the County. A.3-20

Section 3.13 Parks and Recreation: The Parks and Recreation section periodically mentions trails as almost an afterthought, as opposed to being an essential form of public recreation. In fact, based on over 7,000 surveys performed as part of the County's Recreation Master Plan, it is CRAHTAC's understanding that hiking is the most popular form of recreation in the County. Further, the EIR fails to provide any detailed descriptions of major hiking trail systems or their estimated mileage in the various planning areas. This is particularly important in communities such as the Eastern Goleta Valley that lack foothill hiking trails, particularly those that provide access into the public's nearby National Forest, requiring residents to drive long distances such as to Montecito or Gaviota for such hiking opportunities. Finally, the EIR does not discuss the importance of trails and other forms of recreation from a public health, safety, and welfare perspective, despite the fact that the County's own Ordinance #4317 states that based upon the principles and standards of the recreation element of the Santa Barbara County general plan, that provision of public parks, recreation, and trails are essential to "*the public interest, convenience, health, welfare, and safety.*" The importance of parks and trails to public health and welfare has been recently reaffirmed by the Board of Supervisors as part of its hearings on Housing Element rezone site selection criteria, which must also be discussed and described here. This is a major oversight that requires correction (Please see the discussion under the proposed revised Impact LU-2 above). A.3-21

To better address these issues, please provide the following specific amendments to this section:

Section 3.13.2.2, page 3.13-16: If hiking is the most popular form of recreation in the County, it should be mentioned with other recreation types- Add a new section to this page: A.3-22

Public Trails: *The County currently owns over 150 miles of public hiking trails that are free and openly accessible to the public. Public hiking trails can be located within County-owned or other agency public open spaces, on conservation or other open spaces managed by private non-profit agencies, or across privately owned lands traversing easements granted to the County. Such trails provide popular free recreation to all residents of the County, including disadvantaged community members.*

A.3-22 Cont.

Page 3.13-16: Please change the subtitle to **Local Parks, Trails, and Recreation Facilities** to reflect the importance of trails to the public.

A.3-23

Page 3.13-16: Under County Parks discussion, please add an additional discussion regarding trails or consider a new section on trails as follows:

County Public Hiking Trails: The County owns or has easements for approximately 150 miles of public trails, with trails often traversing through different jurisdictions or from publicly owned land within easements across private lands. The County's trail systems are typically maintained by community trail organizations such as the Montecito Trails Foundation or Santa Maria Valley Open Space. While County-owned trails exist in many communities, major trail systems open to the public include approximately 90 miles in Montecito and Summerland, more than 6 miles in the Orcutt Hills, 2 miles on More Mesa, 2.5 miles on the San Marcos Foothills Preserve and 1.5 miles within Tuckers Grove County Park. Communities such as the Eastern Goleta Valley currently lack a foothill trail system such as that found in Montecito, while residents of Santa Ynez Valley lack accessible developed public trails in close proximity to Ballard, Los Olivos, and Santa Ynez. Residents must drive to the National Forest, Midland School, or Lake Cachuma to access trails.

A.3-24

Please consider adding new tables on pages 3.17-3.19 identifying major trail systems or amending tables 3.13-6 and 3.13-7 to add details on trails, including estimated mileage. Again, if trails are the most popular form of recreation in the County, the EIR needs to disclose and discuss these facilities in more detail and not simply ignore the issue. If precise data on all mileage of trails is unavailable, use estimates to provide full disclosure to the public.

A.3-25

Page 3.13-20- **Summary of Public Parks, Trails, and Public Open Space by Region**. Please add trails to this title and add a summary overview of trails similar to that for parks and open spaces. Please modify Table 3.13-8 to include trails or include a separate table for trails. If precise data is not available for trails, then discuss generally with as much data as is available. Again, if trails are the most popular form of recreation in the County, the EIR needs to disclose and discuss these facilities in more detail.

A.3-26

Page 3.13-20: Please delete the statement: "However, these public open spaces do not provide existing neighborhood and regional parks or other recreational facilities that are subject to public use that may deteriorate the facility's physical condition per CEQA (i.e., playgrounds, sports fields and courts, public restrooms, BBQs, picnic tables)." This statement is wholly inaccurate and unsubstantiated. Trails within open spaces and elsewhere are subject to severe deterioration and physical environmental impacts (e.g., trail cutting, erosion, habitat degradation) with overuse and

A.3-27

overcrowding, which can also include increased user conflicts with public safety implications (e.g., mountain bike-equestrian interactions). In addition, limited parking at rural trailheads can quickly be fully subscribed during peak periods, depriving existing residents of trail access. Please also see the comments on inadequate and artificially narrow thresholds below.

A.3-27 Cont.

Please also delete or modify the statement that public parkland is located within urban communities and is "reasonably accessible to existing residential neighborhoods via active transportation modes, such as walking and biking and transit." This does not reflect the reality in the Eastern Goleta Valley or central and north Orcutt, where public parks are typically not easily accessible by walking, biking, or even transit. This is even more true for hiking trails, where residents of these communities typically drive relatively long distances to access the Montecito foothill trails or those in the Orcutt Hills, where transit is often of limited or no utility.

A.3-28

Page 3.13-21: Existing Recreation Service Levels: This section cites only the County's 44-year-old standard for parkland of 4.7 acres per 1,000 residents. The EIR should discuss and disclose that the National Parks and Recreation Association (NRPA), a national body recognized as authoritative on recreation issues, updated this old standard to 10.7 acres per 1,000 residents long ago. As the County's standard is clearly outdated, the EIR must disclose the County standard, but is not required to use it for impact analysis. At a minimum, the EIR should disclose the updated NRPA standard of 10.7 acres per 1,000 residents and describe how that would affect parkland demand from planned growth. Further, while neither the county nor NRPA has adopted standards for miles of trails per 1,000 residents, this does not excuse the EIR from providing at least a general description of service levels for trails. This is particularly important as some communities, such as the Eastern Goleta Valley, are particularly deficient in trails, especially those with access to the National Forest. It should be noted that many states have a high ratio of trails per 1,000 residents that could provide a metric for measuring demand, including (source- https://www.destinationhikers.com/trailmiles-by-states/:)

- Maine: 39.4 miles per 1,000 people
- Vermont: 29.5 miles per 1,000 people
- Colorado: 27.7 miles per 1,000 people
- Alaska: 26.1 miles per 1,000 people
- Wyoming: 25.8 miles per 1,000 people

Using a rough average of 30 miles per 1,000 residents in these five states could provide a useful metric for measuring increased demand for trails. Regardless, as reportedly the most popular form of recreation in the County, the EIR must make at least some attempt to disclose existing trail service levels, which vary widely by planning area. However, these rural states may only partially reflect conditions in the County, so CRAHTAC recommends new trail service standards as discussed below.

CRAHTAC recommends a trail service metric using the County's own trail system for various communities and the related ratio of miles of trails per thousand residents. For example, the Montecito Trails Foundation maintains roughly 90 miles of trails to serve the approximately 14,000 residents of the communities of Montecito and Summerland, a ratio of approximately 6.4 miles of trails per 1,000 residents. In the community of Orcutt, the County provides roughly 8 miles of existing

A.3-29

trails in the Orcutt Hills and along Orcutt Creek, with more than 8.5 miles of approved new trails on Key Site 3 and recently purchased county-owned land in the Orcutt Hills. These 16.5 miles of existing and approved trails would result in a ratio of roughly 2 miles of trails per 1,000 residents. Thus, to serve roughly 18,000 new residents allowed under the Housing Element with trail systems equivalent to these two areas would require roughly 36 to 115 new miles of trails. CRAHTAC requests that the EIR use these metrics as more relevant or employ other relevant trail metrics to address impacts to public trails.

A.3-29

Table 3.13-11: Please add details on trails and trail mileage to this table where relevant for each park facility. Use estimates where precise mileage is not available.

A.3-30

Regulatory Setting Section

Please be sure to carry key elements of the regulatory setting section into the impact analysis for parks, recreation and trails. For example, Land Use Development Policy 4 requires a finding that "adequate public or private services" are available to serve new development, which would include public parks, recreation, and trails. Within the Eastern Goleta Valley, several policies discussed below are directly related to development within areas such as the San Marcos and South Patterson agricultural areas. They should be integrated into the impact analysis:

Policy PRT-EGV-1.2: To enhance overall public health and well-being, recreation facilities shall be located, designed, and constructed, as needed, to increase opportunities to play and exercise in Eastern Goleta Valley.

Policy PRT-EGV-1.3: New public recreational resources shall be prioritized for underserved locations to increase equitable access to a range of recreation opportunities.

Policy PRT-EGV-1.4: The County shall prioritize locating recreational resources in areas within walking or biking distance of residential and educational land uses

A.3-31

Section 3.13.3.3 Local: Please add a discussion of the County's **Parks, Recreation and Trails Maps (PRT Maps)** to the Land Use Element discussion including relevant language from the back of the maps, to the Comprehensive Plan section. The PRT Maps are an adopted part of the County's Comprehensive Plan and are a key vehicle for acquiring parks, recreation, and especially trails.

Policy PRT-EGV-4.2: Properties with the potential for maximum public use shall be considered a high priority in park acquisition decisions. Public use is maximized when the park locations:

- Are highly accessible to many people (e.g., park along the bike path, at a trailhead, or on a heavily used transportation corridor).
- Could be connected to a network of multimodal transportation options and/or trails.
- Provide a mix of recreational resources to serve a wide range of visitor demands (e.g., playgrounds near playing fields or a dog park, etc.).

Page 3.13.39: Santa Barbara County Land Use and Development Code: Please also include a discussion of the County's existing Recreation Overlay in this section, as such an overlay is in place over the Tatum property within the San Marcos agricultural area.

Please add a discussion of the Planned Residential Development zone district to this section, as over the last 30 + years, most of the County's new urban area parks and trails have been acquired using this zone district. The Housing element proposes to rezone several sites out of this zone, and the EIR needs to provide information on this district to support impact analysis.

A.3-31 Cont.

Section 3.13.4.1 Thresholds of Significance: the discussion should note that CEQA Appendix G provides examples of thresholds and is not ironclad. Agencies are permitted to adopt their own thresholds as the County has done or add thresholds as deemed appropriate within an EIR.

We recommend the addition of the following threshold: *Would substantially increase demand for parks, recreation, and trails within a community or neighborhood underserved by such facilities.*

A.3-32

Impact PSR-5: Please add a discussion on impacts to trails, including increased overcrowding, physical deterioration, and lack of easy access. Trails are a major recreational resource, and this impact mostly overlooks this issue. Please also weave the above-referenced policy discussion into the impact analysis to ensure that such policies are addressed in the analysis. This impact should also discuss the impacts of proposed reductions in Park Development Impact Fees. When combined with reductions in open space requirements and rezone from the PRD zone district, such measures could fundamentally undermine the County's ability to provide new parks, recreation and trails to service new development. Please also discuss here or in land use the impacts of rezone from PRD to DR as the PRD zone district has been a primary tool for trail acquisition.

A.3-33

Mitigation Measures: Please consider adding a new mitigation measure to amend the PRT maps concurrent with rezones for sites that have not been planned for development or that are proposed for increased density, increasing demand for public recreation. The PRT maps are a primary County tool for trail acquisition. For sites such as the San Marcos and South Paterson Agricultural areas or Glen Annie Golf Course, which were never planned for development, updated PRT maps would provide a vehicle to address such planning and ensure the provision of adequate public services. This is also applicable to sites such as northern Orcutt lands within the flight approach zone, which could provide public trails in a neighborhood underserved by trails. Similarly, sites such as St. Vincent's East, which are proposed for increased density and have not been planned since 1980, could host a new trail along Atascadero Creek to provide neighborhood access to San Marcos Park and the Preserve. Please also add language requiring accompanying zoning ordinance amendments to provide objective, quantified language to ensure implementation of PRT map recommendations for "by right" or builder's remedy projects.

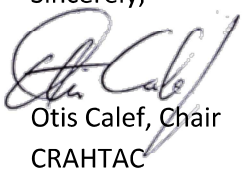
A.3-34

Cumulative Impacts: Please add trails to the cumulative impact discussion. Because most trails lie within County unincorporated communities such as Montecito and the Orcutt Hills, increased growth within the cities will substantially increase demand for such trails with adverse effects of trail conditions, including physical deterioration and overcrowding.

A.3-35

Thank you for considering this input!

Sincerely,



Otis Calef, Chair
CRAHTAC

CC: County Board of Supervisors
County Planning Commission

Comment Letter A.3 – [CRAHTAC]

Comment Response A.3-1

The comment provides an overview of CRAHTAC's role and presents a summary of the comments provided later in this letter, including comments asserting the EIR is inadequate in its analysis of land use and recreational impacts. Detailed responses to each of the discrete comments provided in this comment letter are provided below.

Comment Response A.3-2

The comment requests that Section 3.10, *Land Use and Planning* be revised to include a discussion of the County's Parks, Recreation, and Trails Maps (PRT Maps). Language regarding the PRT Maps has been added to the summary of local plans and policies in Section 3.10.3.2, *Local* in Section 3.10, *Land Use and Planning* and Section 3.13.3.3, *Local* in Section 3.13, *Public Services and Recreation.* As presented in this added discussion, the PRT Maps consist of five maps adopted by the Board of Supervisors. These maps establish the envisioned comprehensive parks, recreation, and trails network for the unincorporated areas of the county. Specifically, the PRT Maps delineate existing and proposed parks, open areas, joint-use facilities, on-road trails, and off-road trails countywide and in the Montecito-Summerland-Carpinteria area, Goleta-Santa Barbara area, Lompoc area, and Santa Maria area. In addition, in 1997, the Board of Supervisors adopted amendments to the PRT Maps to eliminate the Orcutt Area from the Santa Maria Area PRT Map and adopt by reference the Orcutt Community Plan Parks, Recreation and Trails map of the Orcutt Community Plan.

Further, applicable discussion of the PRT Maps has been included in the discussion and analysis presented in Impact PSR-5 of Section 3.13, *Public Services and Recreation.* As presented in this added discussion, implementation of the proposed Project and future development of these sites would not conflict with any of the existing or proposed trail corridors identified on the PRT Maps. The PRT Maps comprise a planning tool that identifies existing resources and a conceptual plan for future recreational facilities. The existence of a PRT Map resource on a site identified in the sites inventory does not determine whether a housing project is obligated to provide a public recreational facility. Any exaction or requirement for the provision of public parks or trails must be based on the principles of nexus (established in *Nollan v. California Coastal Commission* 483 U.S. 825 [1987]) and rough proportionality (*Dolan v. City of Tiger*, 512 U.S. 374 [1994]) (refer also to CEQA Guidelines Section 15041). While local governments can place conditions on land use permits, a "nexus" is required between the permit conditions and a legitimate regulatory interest. A "nexus" exists where the permit conditions are connected to and further the regulatory interest. Even if there is a "nexus" between the conditions and the regulatory interest, permit conditions are required to be "roughly proportional" to the projected impacts of the land use development. "Proportionality" does not require a precise mathematical calculation, but jurisdictions "must make some sort of individualized determination that the required [condition] is related both in nature and extent to the impact of the proposed development."

Furthermore, the lack of a map identifying a potential future trail or park does not prevent a recreation facility from being established or required as part of a housing project if there is the appropriate nexus to do so.

Comment Response A.3-3

The comment requests that Section 3.10, *Land Use and Planning* be revised to include a discussion of the Open Space Element regarding the importance of open space for outdoor recreation. The Open Space Element sets priorities for the use of Open Spaces via the Open Space Design Concept Procedure (refer to Page 74). However, the Open Space Element does not identify "open space as a high-priority" in the context of other land uses. Page 8 states "…the lands designated by the Open Space Design Concept have open space potential. However, this does not imply that the public interest would best be served by preventing development of all lands shown in the various open space categories." As such, the requested revisions to Section 3.10, *Land Use and Planning* are not appropriate.

Comment Response A.3-4

The comment asserts that the discussion of the Eastern Goleta Valley Community Plan in Section 3.10, *Land Use and Planning* fails to identify the high priority placed on providing public parks, recreation, and trails. The comment provides recommended language to add to this discussion. However, the proposed Project involves the implementation of a Housing Element Update, which includes a land use plan and programs to facilitate the development of housing on sites within unincorporated lands throughout the county. As such, the description of the Eastern Goleta Valley Community Plan in the EIR relates to the priorities of the plan regarding housing. Recommended language for inclusion in the discussion of the Eastern Goleta Valley Community Plan is not critical or directly relevant to the analysis of land use and planning impacts of the proposed Project, and the addition of the recommended language is not appropriate.

Comment Response A.3-5

The comment asserts that the discussion of the Goleta Community Plan in Section 3.10, *Land Use and Planning* fails to identify the high priority placed on providing public parks, recreation, and trails. The comment provides recommended language to add to this discussion. However, the proposed Project involves the implementation of a Housing Element Update, which involves programs to facilitate the development of housing on sites within unincorporated lands throughout the county. As such, the description of the Goleta Community Plan in the EIR relates to the priorities of the plan regarding housing. Recommended language for inclusion in the discussion of the Goleta Community Plan is not critical or directly relevant to the analysis of land use and planning impacts of the proposed Project, and the addition of the recommended language is not appropriate.

Comment Response A.3-6

The comment asserts that the discussion of the Orcutt Community Plan in Section 3.10, *Land Use and Planning* fails to identify the high priority placed on providing public parks, recreation, and trails. The comment provides recommended language to add to this discussion. However, the proposed Project involves the implementation of a Housing Element Update, which involves a land use plan and programs to facilitate the development of housing on sites within unincorporated lands throughout the county. As such, the description of the Orcutt Community Plan in the EIR relates to the priorities of the plan regarding housing. Recommended language for inclusion in the discussion of the Orcutt Community Plan is not critical or directly relevant to the analysis of land use and planning impacts of the proposed Project, and the addition of the recommended language is not appropriate.

Comment Response A.3-7

The comment requests that discussion of the County Zoning Ordinances in Section 3.10, *Land Use and Planning* should be amended to include a discussion of the PRD zone district as it relates to open space, parks, and recreation, and the County's recreation overlay. However, additional discussion of the PRD zone district is not required or applicable to the proposed Project, as the Project does not propose any rezoning of sites to the PRD zone district. Further, the rezoning of sites from PRD to the DR zone district would not result in any physical impacts in and of itself. Rather, potential impacts stem from the proposed density of development associated physical effects of future residential and mixed-use development, the impacts or which are thoroughly discussed in this EIR This comment has been noted and will be forwarded to County decision makers for their consideration.

To address the comment about the County's existing Recreation Overlay, to clarify, the County's zoning ordinance (e.g., LUDC) does not currently contain a recreation overlay. The County's Comprehensive Plan Land Use Element adopted a Proposed Public or Private Park/Recreational Facility Overlay. An expanded discussion of this component of the Land Use Element has been added to Section 3.10, *Land Use and Planning,* and Section 3.13, *Public Services and Recreation.* As described therein, the Proposed Public or Private Park/Recreational Facility Overlay is applicable to those lands suitable for future inclusions within the recreational land use designation. Appropriate locations for the overlay include lands selected by the County Community Services Department, Parks Division from those sites designated as having the highest suitability for recreation use, areas designated by advisory committees, shoreline areas designated within the Coastal Zone, and land with additional access along creeks and drainage ways (County of Santa Barbara 2016). Based on the extent of this Land Use Element overlay and the sites inventory, one Project site – Pending Project No. 42 (Tatum) – underlies this overlay. The EIR includes a programmatic analysis of potential impacts associated with the potential future development of this site, based on the proposed rezoning to DR with a minimum density of 20 dwelling units per acre and a maximum density of 30 dwelling units per acre. However, as described in Chapter 1, *Introduction,* and Chapter 3, *Environmental Impact Analysis,* the proposed Project does not involve specific development plans or housing project proposals. Future review of project applications for the development of this site would include review and consideration of the development of this site relative to the existing Proposed Public or Private Park/Recreational Facility Overlay of this site. However, it should be noted that the existing Proposed Public or Private Park/Recreational Facility Overlay only identifies suitable land for future inclusion of recreational land use designations. The Comprehensive Plan land use overlay designation of the site does not mandate that the development of the site include recreational land use designations. It should be further noted that while the site currently designated with the Proposed Public or Private Park/Recreational Facility Overlay, under the Eastern Goleta Valley Community Plan, the site was subsequently redesignated and rezoned for neighborhood development due to identification of the site as being suitable for housing for up to 20 dwelling units per acre.

Comment Response A.3-8

The comment requests that a discussion of the County's existing Recreation Overlay be included in Section 3.10, *Land Use and Planning.* Please refer to Comment Response A.3-7.

Comment Response A.3-9

The comment provides a summary of CEQA Guidelines Section 15131, which governs the consideration of economic or social effects of a project in an EIR, and states that such considerations

should be evaluated in CEQA-compliant environmental documents when economic and social effects would result in a significant physical change to the environment. Consistent with CEQA Guidelines Section 15131, the EIR appropriately includes a thorough discussion and analysis of the potential physical changes resulting from implementation of the proposed Project. Additionally, the EIR includes detailed discussions and analysis of quality of life effects in Section 3.10, *Land Use and Planning.* As described therein, quality of life effects can be broadly defined as the aggregate effect of a project's impacts on individuals, families, communities, and other social groups, and on how those groups function. They are social changes derived from physical effects on the environment. Quality of life effects are typically subjective and not based on quantifiable measures. However, while hard to quantify, quality of life issues are often of primary concern to the community affected by a project. The County's *Environmental Thresholds and Guidelines Manual* states that although changes to quality of life resulting from a project are not treated as significant effects on the environment pursuant to CEQA, many quality of life considerations are addressed in Comprehensive Plan policies, which are the subject of Section 3.10, *Land Use and Planning* in the Program EIR. Further, potential changes to quality of life are social changes that may be used: 1) to identify physical impacts caused by a change in quality of life; and 2) when related to a physical change, to determine whether the physical change is a significant effect on the environment. The thresholds of significance referenced for resource areas analyzed in the EIR do appropriately include quality of life considerations. For example, the noise thresholds in Section 3.11, *Noise* relies on quality of life considerations to determine when noise experienced by a sensitive receptor is considered "significant." Therefore, the EIR does trace a chain of cause and effect through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes, as required by CEQA Guidelines 15131.

Comment Response A.3-10

The comment asserts that the EIR's analysis of quality of life impacts discussed in Section 3.10, *Land Use and Planning* rely on outdated quality of life thresholds, which the commenter states were amended and adopted by the Planning Commission and Board of Supervisors in 2020. However, quality of life impacts in Impact LU-3 are evaluated in the context of updated thresholds presented in the County's 2021 *Environmental Thresholds and Guidelines Manual.* Therefore, the EIR appropriately includes consideration and analysis of quality of life thresholds and impacts consistent with the most up-to-date thresholds and guidance adopted by County decision-makers. There is nothing in the thresholds that requires a consideration of recreation in the context of quality of life. Further, the EIR includes detailed discussion and analysis of potential impacts to parks and recreational facilities, including increases in demand for such facilities as a result of increases in residential populations, in Section 3.13, *Public Services and Recreation,* consistent with adopted County thresholds and guidelines. As described in Impact PSR-5, new development facilitated by the proposed Project would be required to provide open space and/or recreational amenities on site as part of individual applications for development of a site, or pay development impact mitigation feeds to help finance the cost of new or expanded parks, trails, and recreational facilities, consistent with existing County policies and programs.

Comment Response A.3-11

The comment requests that Impact LU-2 be revised to include analysis of impacts associated with increased demand for trails as they related to adopted County policies and the PRT Map. The comment further requests incorporation and analysis of recommended trail service standards as part of this

impact. However, detailed discussion and analysis of potential impacts associated with increased demand for recreational amenities, including trails which are a component of public parkland, is discussed in Section 3.13, *Public Servies and Recreation.* Specifically, please refer to analysis presented in Impact PSR-5. It should be noted that there are no established standards that have been adopted by the County with regards to the evaluation of trails, or miles of trails per service population. The County, in its discretion, evaluates impacts to trails in the context of trails being a component of public parkland, and the minimum standard ratio of 4.7 acres of public parkland per 1,000 residents, as adopted by the Board of Supervisors as part of the 1980 Land Use Element and the Santa Barbara County Code of Ordinances: Article IV. Park and Recreation Dedication and Fees. Further, given that the proposed Project involves implementation of a land use plan and programs to facilitate development of housing on sites within unincorporated lands throughout the county, it is not considered appropriate for the proposed Project and this EIR to consider the development of new parkland service standards or thresholds. Rather, developing updates to such standards and thresholds would more appropriately be addressed as a part of the pending Recreation Master Plan or other similar recreation planning effort.

Comment Response A.3-12

The comment requests that analysis of consistency with Policy LUA-EGV-1.6 of the Eastern Goleta Valley Community Plan in Table 3.10-3 of Impact LU-3 be revised to identify the proposed Project as potentially inconsistent with the recreation planning sections of this policy. However, the policy consistency analysis presented in Table 3.10-3 concludes that the proposed Project would be potentially consistent with Policy LUA-EGV-1.6 given that the Housing Element Update would preserve urban agricultural resources to the greatest extent feasible. The sites inventory only includes the minimum number of agriculturally zoned housing sites to adequately accommodate the County's RHNA plus 15 percent buffer for lower- and moderate-income affordability levels in conformance with state housing law. As a result, even though there is a potential for conversion of urban agriculture, the Housing Element Update preserves urban agriculture in Eastern Goleta Valley to the greatest extent feasible given state-mandated housing needs. Further, the Eastern Goleta Valley Community Plan sets forth conditions and requirements for the conversion of these two urban agricultural areas to non-agricultural uses. If selected by the Board of Supervisors, it is ultimately the responsibility of the Board of Supervisors to determine consistency with this and other policies. Because the proposed Project would preserve all rural agricultural land in Eastern Goleta Valley and would preserve urban agricultural land to the greatest extent feasible, the Housing Element Update would be potentially consistent. This comment is noted and will be forwarded to the decision makers for their consideration.

Comment Response A.3-13

The comment requests that the analysis of consistency with Land Use Development Policy 4 of the Comprehensive Plan in Table 3.10-3 of Impact LU-3 be revised to describe how the County will ensure the provision of adequate public services for parks, recreation, and trails. However, the commenter's interpretation of this policy is inaccurate. Land Use Development Policy 4 applies to physical infrastructure limitations that are required for the site's use (i.e., water, trash, sewer, access). Land Use Development Policy 4 does not apply to public or private parks, recreation, and trails and has never been interpreted as such. Requested revisions to the preliminary policy consistency analysis of this policy are not appropriate or necessary.

Comment Response A.3-14

The comment requests the preliminary policy consistency analysis presented in Table 3.10-3 of Impact LU-3 be revised to include consideration and analysis of Policies PRT-EGV-1.2 through PRT-EGV-1.4. However, these policies are focused on recreational amenities, particularly the design and siting of recreational amenities. Given that the proposed Project involves the implementation of a Housing Element Update and does not involve analysis of the design or siting of recreational amenities, inclusion and analysis of consistency with these policies is not appropriate or necessary.

Comment Response A.3-15

The comment states that Impact LU-3 should be amended to reflect the updated quality of life thresholds described in Comment A.3-10. Please refer to Comment Response A.3-10.

Comment Response A.3-16

The comment requests revisions to Section 3.10.4.3, *Cumulative Impacts,* to include discussion of cumulative impacts on County parks, recreation, and trails, including quality of life and policy consistency, of planned development of 20,000 new homes with 60,000 residents across the county's eight incorporated cities. However, detailed discussion and analysis of the proposed Project's potential contribution to impacts to land use and recreational resources caused by cumulative projects listed in Chapter 3, *Environmental Impact Analysis* is already presented in the cumulative impacts discussion in Section 3.10, *Land Use and Planning* and Section 3.13, *Public Services and Recreation.* As presented in Chapter 3, *Environmental Impact Analysis,* this analysis includes consideration of cumulative impacts associated with the implementation of the Housing Element Updates of each of the county's eight incorporated cities. Please refer to the relevant cumulative impact analysis within each of these sections for detailed discussion and analysis of the proposed Project's potential contribution to cumulatively significant impacts to land use and recreational resources.

The comment further asserts **MM LU-1** is inconsistent with the requirements set forth in CEQA Guidelines Section 15126.4, as well as other mitigation presented in this EIR, because **MM LU-1** fails to commit the County to any specific actions. The comment states that **MM LU-1** must be rewritten to address impacts to public recreation. However, **MM LU-1** currently states that the "County shall amend the zoning ordinances for the DR Zone District to allow for the following uses as part of the proposed projects on sites zoned DR." The term "may" applies to the mitigation measure provisions under which a developer "may" meet open space requirements through "public open space" or private/common open space. The intent of the mitigation is not to require developers to make the open spaces of a future development site open to the public, but provides developers with the option should they choose to do so. This language reflects the requirements currently applicable to the PRD zone, which allows for the provision of private or public open space. This mitigation measure is consistent with the requirements of CEQA Guidelines Section 15126.4 as it does commit the County (i.e., Lead Agency) to implement zoning ordinance amendments to amend the DR zone to allow developers the flexibility to provide onsite recreational facilities to the public. Projects in the DR Zone would continue to be required to provide recreational amenities to further mitigate impacts associated with increased demand for public parkland; however, this mitigation measures would offer flexibility to developers to allow onsite recreation to be open to the public. In addition, payment of development impact mitigation fees as currently required through existing County policies and ordinances would still be required for qualifying projects. Additionally, even resident-only

recreational facilities would decrease future demand on existing public recreational amenities and provide recreational amenities to serve the increase in population given the onsite recreational access at these residential sites, which would reduce future deterioration of public parkland. Nevertheless, as presented in the EIR's analysis of impacts, even with the implementation of **MM LU-1** and these provisions, impacts would remain significant and unavoidable.

Further, the County retains the authority to identify the appropriate zone for identified potential rezone sites. In developing the sites inventory and determining the appropriate zoning for rezone sites, the County determined that the PRD zone district would impede the feasibility of future development of potential rezone sites in the inventory based on the determination that assuming a PRD maximum unit count across multiple parcels of multiple owners would require coordinated development, planning, and timing that would reduce the feasibility of housing being developed on these sites within this housing cycle. The County, per State HCD guidance, must reduce governmental constraints to the development of these sites for future housing to meet the RHNA, not increase impediments. Therefore, rezoning of sites to PRD is considered to be inappropriate and inconsistent with State HCD guidance.

Comment Response A.3-17

The comment recommends that **MM LU-1** be amended to include details on the provision of public open space, parks, recreation and trails. Please refer to Comment Response A.3-16.

Comment Response A.3-18

The comment requests that a new mitigation measure be included in Section 3.10, *Land Use and Planning* to require updates to the County's PRT Maps as part of the process for Program 1 (Potential Rezone Program) of the Housing Element Update. The comment provides recommended language to add to this discussion. However, the proposed Project involves the implementation of a Housing Element Update, which involves a land use plan and programs to facilitate development of housing on sites within unincorporated lands throughout the county. As such, amendments to the PRT Maps are not considered appropriate or directly relevant to the proposed Project, and such amendments are better addressed as part of a recreation planning effort, such as the pending Recreation Master Plan. Drafting PRT Maps for specific, isolated parcels considered in the Housing Element Update sites inventory without any regional context is not appropriate, as the PRT Maps are utilized as a planning tool to identify existing resources and desired improvements or provision of future recreational facilities within a region, as opposed to establishing exact placement or alignment of trails and park facilities. As described in Comment Response A.3-2 above, the existence of a PRT Map does not determine whether a housing project is obligated to provide a public recreational facility. Any exaction or requirement for the provision of public parks or trails is based on the constitutional principles of nexus and rough proportionality. Similarly, the absence of delineated trail corridors on a map identifying a potential future trail or park does not prevent one from being established or required as part of a housing project if there is the appropriate nexus to do so. That said, some housing sites may be more suitable for public trails than others, given site conditions, proximity to open lands, and their location in relation to the existing established trail network. There are already policies in place in the Land Use Element and various community plans that encourage the provision of public recreational facilities, and these can be considered when evaluating individual development proposals in the same way as a PRT map. Additionally, **MM T-1** requires the establishment of site design strategies to reduce vehicle trips and as feasible would require bikeway and pedestrian route connections from a project site to and between existing facilities, including existing pedestrian routes

as well as bicycle facilities (Class I, II, III, or IV), including providing connections where appropriate through the site to the existing bikeway network in the project vicinity. While the emphasis on these connections is to reduce vehicle trips, they can provide a recreational benefit as well.

Comment Response A.3-19

The comment requests that the discussion in Impact LU-2 be amended to address potential inconsistencies with Land Use Development Policy 4 and Policies PRT-EGV-1.2 through PRT-EGV-1.4. Please refer to Comment Responses A.3-13 and A.3-14 above.

Comment Response A.3-20

The comment asserts that without any updated planning for providing amenities and consideration of the PRD zone for potential rezone sites, the proposed Project would create substantial conflicts with adopted County policies regarding public services and recreation. Please refer to Comment Responses A.3-13, A.3-14, and A.3-16 above.

Comment Response A.3-21

The comment asserts that Section 3.13, *Public Services and Recreation* fails to provide sufficient descriptions of major hiking trail systems or explain the importance of trails and other forms of recreation for public health, safety, and welfare. In actuality, the Program EIR includes public trails as one of many recreational facilities that exist in all HMAs in the unincorporated county and could be adversely affected by the proposed Project, including increased use and degradation due to population increase within unincorporated communities. As described in Section 3.13.2.2, *Parks and Recreation – Local Parks, Trails, and Recreation Facilities,* public trails exist within all three categories of public recreation property types assessed in the Program EIR, including public parkland, public open spaces, and campgrounds. This section further describes several major trail systems within public parks and open space provided by the County, including the Orcutt Hills Trail System in the Santa Maria Valley and the San Marcos Foothill Preserve in the South Coast. Per the comment, the Final Program EIR provides additional examples of major trail systems in Section 3.13.2.2, *Parks and Recreation,* and estimates the total length of those existing trail systems based on available data from County Parks. This section also discloses the total acreage of all County-owned and managed parks, campgrounds, and open spaces that provide the recreational facilities assessed in the Program EIR, which includes all trails provided within these properties. Please note that privately owned trail systems are not included in the Program EIR's analysis of impacts on public facilities and services.

Existing trails in the county, including in public parks and open spaces, are not currently accurately or comprehensively mapped. The comment suggests that the County owns over 150 miles of public hiking trails but does not provide a source for this information. The County cannot confirm or update this estimate because complete, reliable geodata for all existing public trails in unincorporated areas of the county are not currently available. Nor does this take into account all the trails within Los Padres National Forest within the County that are accessible to the public. As a result, it is impossible as part of this analysis to quantify the complete length of all public trails accurately and reliably, as requested by the commenter. As such, it is also not possible to assess the ratio of existing trail miles to the service population in each HMA, as is possible for public parkland acreage. Without reliable data for the location and length of all public trails in each HMA, the Program EIR cannot assess the existing ratio of trail miles to population as a basis for impact analysis or estimate how population increases under the Housing Element Update could change that ratio.

Further, unlike the County's adopted standard of 4.7 acres of public parkland per 1,000 people, the County does not have a similar standard adopted for trails in the Comprehensive Plan or the County's *Environmental Thresholds and Guidelines Manual.* In fact, per the Land Use Element, the number of trail miles for riding and hiking paths has not been quantified for the County, but the Element acknowledges that the desire by the public for easy and close access to trails and bikeways requires many additional miles of trails and paths to meet demand from residents and visitors. For this reason, the Program EIR analyzes the setting and potential impacts on trails as important recreational facilities within County-owned parks and open spaces. While the commenter's information provided in other comments (e.g., Comment A.3-29) regarding trail service metrics from other agencies and locations is appreciated, it is not within the scope of this Program EIR to establish new significance thresholds for the County that have not been adequately vetted for applicability and relevancy to Santa Barbara County, have not been subject to review by the public or decision-makers, and have not been adopted as part of the County's *Environmental Thresholds and Guidelines Manual.* That would be better accomplished as part of the pending Recreation Master Plan as opposed to the Housing Element Update.

Even in the absence of reliable quantitative data or appropriate local service ratios for trails, the Program EIR still considers the location, users, and accessibility of trails within public parks and open spaces programmatically by region/HMA because recreational trails are important recreational resources under the County's Comprehensive Plan. This attention to parks, recreation, and trails in the Program EIR relates to the County's regulations for public health, safety, and welfare, including Ordinance No. 4317, as provided in the Program EIR in Section 3.13.3.3, *Local* and noted by the commenter. As a result, the Program EIR sufficiently considers impacts on public trails as recreational facilities, including sufficient discussion of trail descriptions consistent with existing knowledge of the public trail network within the Project area, as documented in County plans, policies, and ordinances, as well as sufficient impact analysis in Impact PSR-5, which finds that the proposed Project would result in the substantial physical deterioration of recreational facilities, or could require the construction or expansion of recreational facilities. Therefore, the Program EIR analysis is sufficient, and the additional information requested by the commenter is not required for the analysis of the impacts of the Project. Nevertheless, additional discussion has been provided in Impact PSR-5 to clarify further that impacts on public parks and recreation facilities include impacts on public trails. The additional discussion also discloses the known need for public trails throughout the county and the availability and extent of the existing trail network serving communities affected by the proposed Project. The impact analysis integrates information from the Land Use Element about the public desire for easy and close access to trails and bikeways, requiring many additional miles of trails and paths than can be justified by using normal projections based on participation rates. This additional information bolsters the Program EIR's conclusions that the proposed Project would have a significant and unavoidable impact on parks and recreation facilities because existing standards and fees used to secure recreational improvements to serve communities would not be sufficient to ensure adequate public parklands and recreation facilities, such as public trails are provided to serve the existing county resident population and growth in resident population as a result of the proposed Project. This conclusion would remain even with **MM LU-1**, which would allow public parkland with recreational facilities to be dedicated as part of future housing projects.

Comment Response A.3-22

The comment provides recommended language to be included in Section 3.13.2.2, *Parks and Recreation* regarding existing public hiking trails within the county. Please refer to Comment Response A.3-21.

Comment Response A.3-23

The comment requests a change to the title of the *Local Parks and Recreation Facilities* discussion in Section 3.13.2.2, *Parks and Recreation* to reflect the importance of trails. The requested revisions have been incorporated.

Comment Response A.3-24

The comment provides recommended language to be included in Section 3.13.2.2, *Parks and Recreation* regarding existing public hiking trails within the county. Please refer to Comment Response A.3-21.

Comment Response A.3-25

The comment recommends consideration of revisions to tables in Section 3.13.2.2, *Parks and Recreation* to summarize existing major trail systems within the county and asserts that the EIR must disclose and discuss these facilities in more detail. Please refer to Comment Response A.3-21.

Comment Response A.3-26

The comment requests a change to the title of the *Summary of Public Parks and Public Open Space by Region* discussion in Section 3.13.2.2, *Parks and Recreation* to reflect the importance of trails. Please refer to Comment Response A.3-21.

Comment Response A.3-27

The comment asserts that language provided in the *Summary of Public Parks and Public Open Spaces* stating that "…public open spaces do not provide existing neighborhood and regional parks or other recreational facilities that are subject to public use that may deteriorate the facility's physical condition per CEQA…" is inaccurate and unsubstantiated. The comment requests that this language be deleted. However, as described in Section 3.13.2.2, *Parks and Recreation,* the Program EIR summarizes existing recreation facilities based on three categories of public property types, as follows:

- **"Public parkland"** is developed with recreation facilities that are free and openly accessible to the public. Public parkland can provide both active and passive recreation depending on the park type and location, including sports fields and courts, playgrounds, BBQ and picnic areas, restrooms, trails, and other recreational facilities.
- **"Public open spaces"** are largely undeveloped and primarily provide resource protection and land conservation but may support low-intensity outdoor recreation (e.g., hiking or bird watching) in balance with natural resource preservation.

- **"Campgrounds"** provide low-cost overnight accommodations (i.e., tent sites, RV sites, cabin or yurt rentals) plus related recreational facilities. Campgrounds are typically available only on a fee-based and reservation basis.

In addition, it is noted that campgrounds are often located near trail systems to support outdoor recreation combined with low-cost overnight accommodations. Discussion of campground recreational facilities in Section 3.13.2.2, *Parks and Recreation,* has been revised to reflect this information accordingly.

Pursuant to these definitions, trails, or at least opportunities for walking, hiking, and biking are a component of "public parkland," "public open spaces," and "campgrounds." As it relates to the analysis of impacts to public parkland and public open spaces and the thresholds utilized for analysis of these impacts, please refer to Comment Response A.3-21 above.

Comment Response A.3-28

The comment requests deletion or modification of language provided in the *Summary of Public Parks and Public Open Spaces* regarding the description that approximately 506 acres (67.7 percent) of public parkland is located within urban communities and is reasonably accessible to existing residential neighborhoods. As described in Comment Response A.3-27 above, the Program EIR defines "public parkland" as parkland that is developed with recreation facilities that are free and openly accessible to the public. The language referenced by the commenter is accurate and consistent with this definition, and no revisions to the referenced discussion are required.

Comment Response A.3-29

The comment states that the County's service standard for parkland is outdated, and the EIR analysis should determine potential impacts to parkland using updated standards provided by the National Parks and Recreation Association (NRPA) of 10.7 acres of parkland per 1,000 residents. Please refer to Comment Response A.3-11.

The comment further states that the EIR should disclose and provide a general description of service standards for trails. The comment provides examples of trail service standards of other jurisdictions and provides recommendations of trail service standards for which the EIR should evaluate impacts. Please refer to Comment Response A.3-21.

Comment Response A.3-30

The comment requests that additional details on trails and trail mileage be added to Table 3.13-11. Where data is readily available, information regarding the miles of trails provided at each of the parks summarized in Table 3.13-11 has been added. However, details regarding the mileage of trails existing at many of these parks are not currently known, as many trails may be informal, unmapped, and/or unmeasured. As such, requested information regarding these trails cannot be provided. Refer also to Comment Response A.3-21.

Comment Response A.3-31

The comment requests that discussion in Section 3.13.3, *Regulatory Setting* be amended to include discussion of Land Use Development Policy 4, Policies PRT-EGV-1.2 through PRT-EGV-1.4, Policy PRT-EGV-4.2, the PRT Maps, and the County's existing Recreation Overlay. With regards to inclusion of

Land Use Development Policy 4 and Policies PRT-EGV-1.2 through PRT-EGV-1.4, refer to Comment Responses A.3-13 and A.3-14 above.

With regards to inclusion of Policy PRT-EGV-4.2, this policy applies to specific projects involving park acquisition. Given the Project involves implementation of a Housing Element Update and does not involve park acquisition, this policy is not applicable to the Project and is not applicable for inclusion in Section 3.13.3, *Regulatory Setting*.

With regards to inclusion of the PRT Maps, the County's existing Recreation Overlay, and the PRD zone district, please refer to Comment Responses A.3-2 and A.3-7

Comment Response A.3-32

The comment recommends that the EIR include the addition of a new threshold of significance addressing increases in demand for parks, recreation, and trails within a community or neighborhood underserved by such facilities. While CEQA provides a Lead Agency the ability to adopt their own thresholds of significance, inclusion of the recommended threshold and associated analysis of related impacts is not required. Consistent with the provisions of CEQA, the County, in its discretion, has adopted local thresholds of significance for environmental review as part of its *Environmental Thresholds and Guidelines Manual.* The thresholds presented therein do not include the threshold recommended by the commenter. While the commenter's information regarding theoretical thresholds is appreciated, it is not within the scope of this Program EIR to establish new significance thresholds for the County that have not been adequately vetted for applicability and relevancy to Santa Barbara County, have not been subject to review by the public or decision-makers, and have not been adopted as part of the County's *Environmental Thresholds and Guidelines Manual.* Sufficient discussion of impacts on recreational resources consistent with existing knowledge of the trails network within the Project area, as documented in County plans and policies, is provided in Section 3.13, *Public Services and Recreation*. Therefore, the Program EIR analysis is sufficient, and the additional information requested by the commenter is not required for the analysis of the impacts of the proposed Project.

Comment Response A.3-33

The comment requests that Impact PSR-5 in Section 3.13, *Public Services and Recreation* be amended to include discussion on impacts to trails, including overcrowding, physical deterioration, lack of easy access, and proposed reductions in park development impact mitigation fees. Impact PSR-5 provides detailed discussion of potential impacts of the Project on recreational resources consistent with the thresholds identified in Section 3.13.4.1, *Thresholds of Significance* and guidance for environmental review in the County's *Environmental Thresholds and Guidelines Manual.* The analysis presented in Impact PSR-5 includes detailed discussion of potential impacts to public parkland, of which trails are a component. However, as described in Comment Response A.3-21, additional discussion has been provided in Impact PSR-5 with respect to the growing need for trails throughout the county. As discussed in these revisions, desire by the public for easy and close access to trails and bikeways requires many additional miles of trails and paths than can be justified by using normal projections based on participation rates.

The comment also requests addition of analysis of potential consistency with Land Use Development Policy 4, Policies PRT-EGV-1.2 through PRT-EGV-1.4, Policy PRT-EGV-4.2, the PRT Maps, and the County's existing Recreation Overlay. Please refer to Comment Response A.3-31 above.

Further, the comment also requests the addition of analysis of land use impacts of rezoning of PRD to DR, and asserts that PRD zone district has been the primary tool for park acquisition. Please refer to Comment Response A.3-7.

Comment Response A.3-34

The comment requests that a new mitigation measure be included in Section 3.13, *Public Services and Recreation* to require updates to the County's PRT Maps as part of the process for Program 1 (Potential Rezone Program) of the Housing Element Update. Please refer to Comment Response A.3-18.

Comment Response A.3-35

The comment requests revisions to Section 3.13.4.3, Cumulative Impacts, to include discussion of cumulative impacts on trails. Please refer to Comment Response A.3-16.

9.5.2 NGOs and Community Groups

Carpinteria Valley Association

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Protecting the beauty & natural resources of our valley since 1964

Submitted via email to:
housingelement@countyofsb.org

Jan 30, 2024

Comments on:
Draft Program EIR for the County of Santa Barbara 2023-2031 Housing Element Update

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In this letter we submit comments from Carpinteria Valley Association regarding the Draft Program EIR for the County of Santa Barbara 2023-2031 Housing Element Update.

1. Insufficient analysis of impact of expanding Urban/Rural Boundary

The impact of expanding the Urban/Rural Boundary is insufficiently analyzed/weighted in the DEIR analysis.

DEIR page 4-95 states:

> *In evaluating alternatives under CEQA, different weights may be assigned to the relative importance of specific environmental impacts. In comparing the alternatives to the proposed Project, "more weight" was given to agricultural resources, biological resources, GHGs, hazards and hazardous materials (i.e., airport safety), land use and planning, noise, transportation, utilities and water supply, and wildfire hazards than to other resource area impacts, primarily considering the importance of these issue areas to have the most significant and irreversible impacts and the County's overall policy context for the management of these resources.*

Countywide, there are four sites proposed for rezoning that are outside the mapped Urban/Rural Boundary: Glen Annie, Van Wingerden 1, Van Wingerden 2, and Bailard.

The analysis in the DEIR ignores the importance of higher relative impacts of upzoning sites outside the mapped Urban/Rural Boundary compared to sites inside the Urban/Rural Boundary. This is inconsistent with the assertion in the paragraph above that states that "more weight" was given to certain areas that include agricultural resources.

O.1-1

DEIR pages 3.2-17 - 3.2.18 quote the County of Santa Barbara Comprehensive Plan Agricultural Element as follows:

> *Goal I: Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts) expansion and intensification shall be supported.*
>
> > *Policy I.F: The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.*

The inclusion of the Glen Annie, Van Wingerden 1, Van Wingerden 2, and Bailard is inconsistent with this policy.

The DEIR must adequately analyze the impact of expanding the Urban/Rural Boundary for each site outside that Boundary.

O.1-1 Cont.

2. Incorrect data about Coastal Zone boundary

Table 3.10-4 incorrectly states:

> *...all potential rezone sites and potential County-owned sites are located outside the Coastal Zone and jurisdiction of the CLUP.*

O.1-2

This is false. The Wingerden 1, Van Wingerden 2, and Bailard sites are all in the Coastal Zone and subject to CLUP policies. The DEIR must be updated to correct this error, and to appropriately analyze the implications of these sites being in the Coastal Zone.

3. Inconsistency with CLUP Article II

The DEIR pages 3.2-21 - 3.2.22 quote Article II of the County's Coastal Zoning Ordinance as follows:

> ***Section 35-64***
>
> *2. If a lot is zoned for agricultural use and is located in a rural area contiguous with the urban/rural boundary, rezoning to a non-agricultural zone district shall not be permitted unless:*
>
> *a. The agricultural use of the land is severely impaired because of physical factors (e.g., high water table), topographical constraints, or urban conflicts (e.g., surrounded by urban uses which inhibit production or make it impossible to qualify for agricultural preserve status), and*
> *b. Conversion would contribute to the logical completion of an existing urban neighborhood, and*
> *c. There are no alternative areas appropriate for infilling within the urban area or there are no other lots along the urban periphery where the agricultural potential is more severely restricted.*

O.1-3

The Wingerden 1 and Van Wingerden 2 sites are inside the Coastal Zone and do not meet these mandatory criteria and therefore are not eligible for rezoning. If the DEIR is concluding they do meet these criteria, then the data justifying that conclusion must be included in the DEIR.

4. Insufficient alternatives analyzed

A. As stated in item 2 above, there are three sites that are in the Coastal Zone, and therefore subject to CLUP policies. Given the impacts that result from analyzing this fact, another obvious alternative is a "Non-Coastal Alternative" that excludes the three Coastal Zone sites.

O.1-4

B. DEIR page 4-99 includes this statement:

> *the Reduced Project A Alternative also eliminates the potential rezone sites within the South Patterson Agricultural Area, which would preserve urban agriculture.*

O.1-5

While this is true, it is inadequate analysis since it does not compare this result to the alternative of excluding the Van Wingerden 1 and Van Wingerden 2 sites as potential rezones as these two sites

are actual rural agricultural (outside the mapped Urban/Rural Boundary) which is a higher priority to protect than urban agriculture.

O.1-5 Cont.

C. DEIR sec 2.3.1 states that the Project Objectives listed in that section helped guide the development of project alternatives. One of the objectives listed is:

   2. *Promote housing development on infill sites and maximize housing capacity by rezoning at higher densities to facilitate multifamily housing to accommodate housing for lower- and moderate-income households.*

   Countywide, there are four sites proposed for rezoning that are outside the mapped Urban/Rural Boundary: Glen Annie, Van Wingerden 1, Van Wingerden 2, and Bailard. Anything outside the mapped Urban/Rural Boundary is not "on infill sites" and is therefore inconsistent with this objective. Therefore, the alternatives in the DEIR are inadequate since they do not include an alternative that eliminates, or at least minimizes, the sites outside the Urban/Rural Boundary.

   O.1-6

   Based on the totality of the sites identified for the DEIR, it is clear that rezoning Glen Annie is mandatory for achieving the RHNA since without it, even if every single other site is rezoned, the RHNA would not be achieved. However, this mandatory inclusion is not the case for the Van Wingerden 1, Van Wingerden 2, and Bailard sites.

   A modified alternative should be created as a variation of the environmentally superior alternative ("Alternative 3 – Reduced Project A"). The modifications should be to exclude Van Wingerden 1, Van Wingerden 2, and Bailard, and to include other sites that are inside the mapped Urban/Rural Boundary as necessary to achieve the RHNA and meet the project objectives. This modified alternative would result in more infill (areas currently <u>inside</u> the mapped Urban/Rural Boundary), and therefore would be environmentally superior to Alternative 3 as presently defined.

D. The DEIR emphasizes that it analyzes the overall Housing Element taken as a whole, including capacity from existing zoning, so-called pending projects (which includes actual pending projects with complete applications plus possible projects that do not have complete applications, even if they require rezoning), and potential rezones. However, no alternative identified in the DEIR excludes the rezoning of any so-called pending project, even though doing so would be absolutely appropriate for this analysis. (The exception appears to be the Giorgi site that is shown as a potential rezone in the DEIR and is excluded from Alternative 5 but is shown as a pending project in the "housing simulation". This inconsistency must be corrected in the DEIR.) Since the Bailard site would require a rezone, it is appropriate to consider excluding it from one or more alternatives.

O.1-7

Thank you,

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Comment Letter O.1 – [Carpinteria Valley Association]

Comment Response O.1-1

The comment states that the EIR insufficiently analyzes or weighs the impacts of expanding the urban/rural boundary and that the inclusion of Rezone Site Nos. 11 (Glen Annie), 15 (Van Wingerden 1), and 16 (Van Wingerden 2) as well as Pending Project No. 37 (Bailard) is inconsistent with policies of the County's Comprehensive Plan Agricultural Element.

However, the EIR fully acknowledges and characterizes the potential adverse programmatic impacts of rezoning of agricultural lands within the rural and urban areas and expanding the urban/rural boundary. Detailed discussion of potential consistency with applicable plans and policies, including those of the County's Comprehensive Plan Agricultural Element is presented in Section 3.10, *Land Use and Planning*, as well as Section 3.2, *Agricultural Resources.* In fact, as analyzed in these sections, the EIR acknowledges that the proposed Project could result in potential inconsistencies with such plans and policies, and would result in significant and unavoidable impacts. For instance, Impact LU-2 includes discussion of consistency with Land Use Development Policy 3; however, the EIR states that the proposed Project would be potentially consistent with this policy due to the fact that the County would also be required to expand the Urban Area boundary, making the proposed Project consistent with this policy. Further, in discussion of consistency with Goal III and Policy III.A of the Agricultural Element, the EIR states that the proposed Project could result in the rezoning of rural agricultural areas to housing, as exemplified by Rezone Site No. 11 (Glen Annie), which is zoned AG-II-40 and conversion of this site may be inconsistent with this policy if infill development in the Urban Area is available. This discussion in the Draft EIR is focused on the example of Rezone Site No. 11 (Glen Annie) because other agricultural sites within the Rural Area are located within the Coastal Zone in the Carpinteria Valley, and as such, policies of the CLUP supersede those of the Agricultural Element for these sites. However, the discussion of consistency with the CLUP in Table 3.10-4 has been updated in the Final EIR to include further discussion of these sites and their potential consistency with applicable CLUP policies. As discussed in these revisions, amendments to the County's Local Coastal Program to implement certain Housing Element Update programs, including rezoning of sites within the Coastal Zone, will require certification by the California Coastal Commission. There are four potential rezone sites and three County-owned sites that are located completely within or partially within the Coastal Zone and the jurisdiction of the CLUP. Additionally, numerous existing vacant sites and pending projects lie within the Coastal Zone. Future housing development projects that implement the proposed Project and lie within the Coastal Zone would be processed subject to all CLUP policies, which implement the California Coastal Act, as well as provisions of the County's Article II Coastal Zoning Ordinance (CZO).

With regard the commenter's statements that the EIR insufficiently analyzes or weighs the impacts of expanding the urban/rural boundary and reference to language in Section 4.6, *Environmentally Superior Alternative,* the discussion referenced by the commenter about different weight being assigned to the relative importance of specific environmental impacts is intended to explain how the Environmentally Superior Alternative was identified. More weight to those referenced environmental impacts was not given based on the priority placed on the protection of those resources, but rather more weight was given to those environmental impacts that would experience potentially significant impacts as a result of the proposed Project. This statement in Section 4.6, *Environmentally Superior Alternative* has been further clarified in the Final EIR. Although CEQA does not provide specific guidance in this matter, where an alternative is anticipated to result in reduced impacts for a majority of resource areas and/or substantially reduced impacts in especially critical resource areas, this can

support a finding that the alternative is environmentally superior. In the case of agricultural resources and land use and policy consistency, the EIR concludes impacts associated with the proposed Project would be significant and unavoidable.

Comment Response O.1-2

The comment states that the EIR presents incorrect data about the Coastal Zone boundary or the list of potential rezone sites that are located within the Coastal Zone. In particular, commenters refer to discussion presented in Table 3.10-4, which states that "… all potential rezone sites and potential County-owned sites are located outside the Coastal Zone and jurisdiction of the [Coastal Land Use Plan (CLUP)]." Appropriate revisions to the text of Table 3.10-4 have been made in Section 3.10, *Land Use and Planning* to accurately reflect that there are three potential rezone sites within the Coastal Zone, which include Rezone Site Nos. 15 (Van Wingerden 1), 16 (Van Wingerden 2), and 18 (Friendship Manor). In addition, a small portion of Rezone Site No. 7 (Caird 3) in the Eastern Goleta Valley is located within the Coastal Zone; however, under the Housing Element Update, the portion of this parcel within the Coastal Zone would remain zoned agriculture (A-I-10) if the site were to be selected by the Board of Supervisors.

Despite the referenced language presented in Table 3.10-4 of the Draft EIR, the EIR includes accurate and detailed discussion of potential impacts to resources within the Coastal Zone and potential conflicts with policies of the County's CLUP in relevant sections of the EIR. For instance, each resources section presented in this EIR includes a detailed summary of applicable coastal plans or policies that relate to the potentially affected resources. Nevertheless, Impact AG-2 in Section 3.2, *Agricultural Resources,* has been revised to include discussion of potential impacts associated with the conversion of agriculturally zoned lands within the Coastal Zone, which could be inconsistent with numerous plans and policies, including the County's agricultural preserve program, the Coastal Act, and Policies 8-3 and 8-4 of the CLUP, and Section 35-64 of the CZO. For many other impacts to resources protected under the Coastal Act and CLUP policies, the EIR acknowledges throughout the EIR that future development of identified housing sites, including potential rezone sites, would be required to be processed in compliance with all applicable plans and policies affecting development of the site. For sites within the Coastal Zone, this includes demonstrating compliance with applicable Coastal Act and CLUP policies and receipt of applicable permits and approvals prior to site development. In addition, as acknowledged in Chapter 2, *Project Description,* amendments to the County's Local Coastal Program to implement certain Housing Element Update programs, including rezoning of sites within the Coastal Zone, will require certification by the California Coastal Commission.

Comment Response O.1-3

The comment states that Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) are located within the Coastal Zone and do not meet the criteria of Section 35-64 of the CZO for rezoning to non-agricultural uses, and are therefore ineligible for rezoning.

Impact AG-2 analyzes the physical impacts associated with the conversion of agricultural lands. However, a complete policy consistency analysis is provided for informational purposes in Section 3.10, *Land Use and Planning*. Nevertheless, additional language has been added to Impact AG-2 in Section 3.2, *Agricultural Resources* and Table 3.10-4 in Section 3.10, *Land Use and Planning* as it relates to Project consistency with the CLUP, which is implemented by the CZO. It should be noted that, if selected by the Board of Supervisors, conversion of designated rural agricultural areas would also

require the Board of Supervisors to make required findings in accordance with these development standards. Additionally, conversion of designated rural agricultural lands within the Coastal Zone would require approval by the California Coastal Commission prior to the issuance of building permits. While the purpose of the EIR is to identify physical environmental impacts associated with the proposed Project, these policy issues will be weighed by the Board of Supervisors during the selection of rezones sites.

Comment Response O.1-4

The comment states that the EIR should consider an additional "Non-Coastal Alternative" that excludes the three sites located within the Coastal Zone.

As described in Chapter 4, *Alternatives Analysis,* CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project that would avoid or substantially reduce the significant impacts while accomplishing all or most of the project objectives. CEQA Guidelines Section 15126.6 further states that an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

The EIR presents consideration of eight separate alternatives to the proposed Project, including a No Project Alternative. Of these eight alternatives, three alternatives were discarded from further analysis due to failure to meet Project Objectives, and five alternatives were carried forward for full analysis and comparison to the proposed Project. Excluding the CEQA-mandated No Project Alternative, the EIR thus presents a meaningful analysis of four separate alternatives. Therefore, further consideration of additional alternatives is not required. Nevertheless, these comments will be forwarded to County decision-makers for further consideration in the selection of rezone sites.

Comment Response O.1-5

The comment states that the analysis of Alternative 3 – Reduced Project Alternative A, is inadequate, because it does not compare the preservation of urban agricultural resources that would result from elimination of potential rezones within the South Patterson Agricultural Area to the alternative excluding Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2), since rural agriculture has a higher priority for preservation than urban agriculture.

The County acknowledges that the County's Comprehensive Plan and CLUP each discuss the value and appropriateness of agriculture in the urban and rural areas. However, the EIR's alternatives analysis referenced by the commenter does not place more value in the preservation of urban agriculture over rural agriculture. Rather, the analysis focuses on the fact that by eliminating rezone sites that currently support urban agriculture, Alternative 3 – Reduced Project A Alternative would result in a reduction in impacts to urban agricultural resources when compared to the impacts of the proposed Project. As further described in the referenced analysis, by eliminating sites supporting urban agricultural resources (to the extent feasible while meeting the RHNA plus a 15 percent buffer for lower- and moderate-income households), Alternative 3 – Reduced Project A Alternative would result in a greater level of consistency with the policies of the Eastern Goleta Valley Community Plan that emphasize and prioritize the preservation of urban agricultural resources (e.g., Policies LUA-EGV-1.5, LUA-EGV-1.6). While it is true that an alternative that would eliminate Rezone Site No. 15 (Van Wingerden 1) and No. 16 (Van Wingerden 2) would result in a reduction in the loss of rural agricultural resources if compared to the proposed Project, the EIR alternatives analysis is not required to make the conclusions requested by the commenter for Alternative 3 – Reduced Project A

Alternative. CEQA Guidelines Section 15126.6(d) states that the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. CEQA does not require detailed analysis or comparison of impacts between two alternatives to a proposed project. Nevertheless, the discussion of *Agricultural Resources* under each alternative presented in Section 4.5, *Alternatives Considered and Analysis* has been revised to include a mention of the comparative impacts associated with the conversion of agricultural resources between the respective alternative and the proposed Project.

Comment Response O.1-6

The comment states that the EIR alternatives analysis is insufficient because it does not include an alternative that would eliminate all four sites (Rezone Site Nos. 11 [Glen Annie], 15 [Van Wingerden 1], 16 [Van Wingerden 2] and Pending Project Site No. 37 [Bailard]) that are zoned for or currently support agricultural uses and are located within the Rural Area. It should be noted that in June 2023, after issuance of the NOPs for the EIR and initiation of the Project EIR analysis, the applicant/developer for Pending Project No. 37 (Bailard) submitted a builder's remedy project application for the same site for development of 41 lower-income units and 132 above moderate-income units. Please refer to Master Response 5 for detailed response regarding consideration of this builder's remedy application and programmatic analysis of Pending Project Site No. 37 (Bailard).

While these sites do not represent urban infill sites where housing development is being promoted to maximize housing capacity under Project Objective No. 2, these sites represent the only four sites which would involve rezoning of lands within the rural area out of the over 800 sites included in the sites inventory. The inclusion of these sites and their consideration of rezoning under Program 2 is not at odds with Project Objective No. 2 and does not represent an inadequacy in the EIR. As described in Comment Response O.1-2, the EIR fully analyzes and discloses the potential impacts associated with selection and potential development of these sites.

Further, it should be noted that as described in Comment Response O.1-4 above, the EIR need not consider every conceivable alternative to a proposed project, but shall instead consider a reasonable range of alternatives to a project that would avoid or substantially reduce the significant impacts while accomplishing all or most of the project objectives. Nevertheless, these comments will be forwarded to County decision-makers for further consideration in the selection of rezone sites.

Comment Response O.1-7

The comment states that the EIR should consider an additional alternative(s) that exclude consideration of pending projects that involve proposed rezones. Please refer to Comment Response O.1-4 above.

As discussed therein, the EIR need not consider every conceivable alternative to a proposed project, but shall instead consider a reasonable range of alternatives to a project that would avoid or substantially reduce the significant impacts while accomplishing all or most of the project objectives.

The comment also states that the EIR is inconsistent with the County's Balancing Act Housing Simulation tool, which identifies Rezone Site No. 1 (Giorgi) as a pending project, rather than as a potential rezone site as it is identified in the EIR.

The County has updated Balancing Act to reflect the characterization of sites as described in the EIR, including Giorgi. However, Balancing Act is updated periodically to reflect submitted Builders Remedy applications. Balancing Act accurately shows that Giorgi has a submitted Builders Remedy application.

9.5.3 Individuals

Alamilla, Breanna

From: Suzanne Levine <sjlevine@spanport.ucsb.edu>
Sent: Wednesday, December 20, 2023 12:08 PM
To: PAD LRP Housing Element
Subject: Re: Housing Element Draft Program EIR and Housing Simulation Release

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I recommend a very gradual and careful expansion to avoid glutting Santa Barbara and burdening the already frail grid (electricity etc)
sjl
35 year citizen in SB

I.1-1

On Wed, Dec 20, 2023 at 12:01 PM County of Santa Barbara <housingelement@countyofsb.org> wrote:

PLANNING
DEVELOPME
LONG RANGE PLANN
DIVISION





Comment Letter I.1 – [Suzanne Levine]

Comment Response I.1-1

The comment requests a gradual and careful expansion of housing development to avoid potential impacts to the electric grid serving the county.

Potential impacts to electrical utilities are discussed in detail in Section 3.15, *Utilities and Water Supply*. Please refer to Master Response 1.

Alamilla, Breanna

From: pbj123@cox.net
Sent: Wednesday, December 20, 2023 12:50 PM
To: PAD LRP Housing Element
Subject: RE: Housing Element Draft Program EIR and Housing Simulation Release

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

The recipe looks yummy!!

I.2-1

From: County of Santa Barbara <housingelement@countyofsb.org>
Sent: Wednesday, December 20, 2023 12:01 PM
To: pbj123@cox.net
Subject: Housing Element Draft Program EIR and Housing Simulation Release

Housing Element Draft Program EIR and Housing Simulation Release



PLANNING
DEVELOPME
LONG RANGE PLANN
DIVISION

Comment Letter I.2 – [Anonymous]

Comment Response I.2-1

The comment letter does not provide any direct comments related to the EIR.

Nevertheless, this comment has been noted and will be forwarded to County decision makers for their consideration.

Alamilla, Breanna

From: Catherine Taylor <cathytaylor0017@gmail.com>
Sent: Tuesday, December 26, 2023 4:37 PM
To: Supervisor Das Williams
Cc: PAD LRP Housing Element; Laura Capps; Joan Hartmann; Supervisor Nelson; Steve Lavagnino; sbcob
Subject: Support of preserving Glen Annie golf course and not re-zoning it for housing, as is being proposed with Santa Barbara County's recent Housing Element recertification.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisor Williams,

I am writing in support of preserving Glen Annie golf course (Glen Annie), and not re-zoning it for housing, as is being proposed with Santa Barbara County's recent Housing Element recertification.

Targeting a public golf course to help solve the housing problems is short-sighted. Golf is much more than just a sport. It is a great game for building and developing character, especially in our youth. Golf helps to develop maturity, patience, honor, and perspective. It promotes honesty, acceptance, and integrity; and it offers both emotional and social benefits. Golf is good, low-impact exercise that gets people outside, and can be enjoyed by people of all ages, backgrounds and skill levels.

Glen Annie is not just a golf course. It is a community resource and contributes greatly to the entire South Coast area in many ways. Glen Annie boosts the local economy by attracting people from out of the area who come to play the course and then stay in local hotels and eat and shop in local restaurants and stores. Losing Glen Annie would cause these people, as well as locals, to travel elsewhere to play golf, sending these dollars to other communities.

I.3-1

Glen Annie serves as a venue for charitable fundraising events. Many local, non-profit agencies depend on their annual charitable golf tournament to survive. Glen Annie is the venue for the Santa Barbara County Auto Expo, which helps our local youth's education. Glen Annie is home to countless charitable golf tournaments which benefit our local schools and colleges, especially their sports programs which are generally underfunded. A partial list of charitable golf tournaments held at Glen Annie follows at the bottom of this email.
Glen Annie is a popular place for holding both indoor and outdoor events. It has a 350-person private outdoor dining area. The venue is popular for weddings, rehearsal dinners, banquets, corporate events, and celebrations of life. Glen Annie also regularly hosts wine pairing dinners, highlighting local wineries. All these events attract people to the area, which helps the local economy.

Glen Annie is a member of the Audubon Cooperative Sanctuary Program, which is an award-winning education and certification program that helps golf courses protect the environment by enhancing the valuable natural areas and wildlife habitats that golf courses provide, while preserving the natural heritage of the game of golf. As a result, Glen Annie is home to incredibly diverse wildlife including a wide variety of birds, deer, coyotes, and reptiles. Converting their habitat to a housing development would further stress these animals and pressure their very existence.

In case of a wildfire, Glen Annie serves as a protective buffer to nearby neighborhoods. Converting the course to houses would eliminate the buffer. It would also endanger those living in and around the site in times of wildfire, as Cathedral Oaks and Glen Annie roads are single-laned and are already congested with traffic from Dos Pueblos High School.
I understand that Santa Barbara County and California have a housing problem. The solution should be much more complex and creative rather than a short-sighted simple reaction of converting a public golf course to housing. Losing Glen Annie would be a tremendous loss for the community that could never be regained.

Respectfully,

Catherine Taylor, PE
805-705-4902
817 Santa Marguerita Drive
Goleta, CA 93117

I.3-I Cont.

Partial list of charitable golf tournaments held at Glen Annie:

- Breast Cancer Awareness
- CALM
- Devereux Advanced Behavioral Health
- Retired Employees of Santa Barbara County
- Santa Barbara City Firefighters Association
- Santa Barbara Contractors Association
- Santa Barbara County Farm Bureau
- Santa Barbara Junior Golf Association
- Santa Barbara Mariachi Association
- Santa Barbara Rental Property
- Santa Barbara Trust for Historic Preservation
- Rotary Club
- Goleta Lions Club
- Saint Vincent
- Channel Islands YMCA
- Sam Adams Celebration
- Goleta Valley South Little League
- LPGA Amateurs
- Pacific Pride Foundation
- Bishop Diego High School
- Dos Pueblos High School Foundation
- San Marcos High School Alumni Foundation

Comment Letter I.3 – [Catherine Taylor]

Comment Response I.3-1

This comment letter expresses support for preserving the Glen Annie Golf Course. The commenter highlights the recreational and social benefits of the game of golf as well as the benefits of the Glen Annie Golf Course as a community resource and venue for charitable events. The commenter also describes that the golf course provides wildlife habitat and a protective wildfire buffer.

Please refer to Master Response 2.

Alamilla, Breanna

From: Dale Lauderdale <dale.lauderdale@gmail.com>
Sent: Wednesday, December 27, 2023 3:31 PM
To: Supervisor Das Williams
Cc: PAD LRP Housing Element; Laura Capps; jhartmann@countyofsbsb.org; Supervisor Nelson; Steve Lavagnino; sbcob
Subject: Preserving Glen Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisor Williams
You and your colleagues recently received a well written appeal from Catherine Taylor supporting the preservation of Glen Annie golf Course under the protection of its recreational and agricultural zoning. Rather than take more of your valuable time with additional verbiage, I simply wish to add my strong support to Catherine's appeal (rational).

I do have a question. Is there any consideration given to geological appropriateness for housing development prior to making zoning changes? I hope so.

I.4-1

Sincerely,
Dale Lauderdale
3740 Capri Drive
Santa Barbara, Ca 93105
(805) 350-6353

Comment Letter I.4 – [Dale Lauderdale]

Comment Response I.4-1

This comment letter references and supports the comment letter provided by Catherine Taylor (refer to Comment Letter I.3).

Please refer to Comment Response I.3-1 as well as Master Response 2.

The commenter also asks whether consideration has been given to the geological appropriateness for housing development prior to making zoning changes.

As described in Master Response 2, impacts associated with geology and soils, including issues of slope stability, are discussed in Chapter 5, *Other CEQA Considerations.* However, as discussed therein, the proposed Project would not have the potential for significant impacts associated with geology and soils given that future housing development projects would be subject to compliance with numerous state and local regulations, including the CBC, the Alquist Priolo Earthquake Fault Zoning Act, the County's Comprehensive Plan, and the County's Grading Code (County Code, Chapter 14), which adequately addresses many geologic hazards affecting individual sites.

Alamilla, Breanna

From: smminier <smminier@cox.net>
Sent: Tuesday, January 2, 2024 4:37 PM
To: PAD LRP Housing Element
Subject: Glen Annie housing element

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Santa Barbara county supervisors nd planning commission.

As member of the community for 35 years I sincerely hope that Glen Annie Golf Club will NOT be considered for rezoning and redevelopment .I know you have heard the usual veto element because of traffic, water, an up and running recreational facility, and the Property not being a site that is conducive to low income housing and most of the applicants will be just relocating from within the city. I will just pick one subject so the email may be read and taken under advisement.

I play At Glen Annie Golf Course at least 2 times a week. The wild life there is very special. Glen Annie is the home to a family of four red tail hawks that grace the skies and prosper because of the excellent food sources available. They had given birth in the trees in the upper parking lot and have made it their home. Next a family of four dear grace our driving range area for grass to eat and the area within the property of Glen Annie has the necessary foulage to provide security from any predator's. In addition, A small but very intriguing animal are two road runners. Also not to mention the coyotes, Squaerls and snakes that call Glenn Annie home. In final, Glen Annie host every winter a migration of Canadian Geese that find safety in the lakes of Glen Annie. Also not to mention the ducks and mud hens.

I know this may be trivial in regards of considering Glen Annie as a redevelopment site but I cant help wondering what will happen to the community of this sort that will be evicted, forced from there land or parish all together. Unfortunately the act of outside pressure that is based on a general concept for the state verses each city or county being the judge on its available spaces to grow.

I.5-1

Thank you for your time and consideration,

A member of your community but may be short lived!

Sent from Mail for Windows

Comment Letter I.5 – [Anonymous]

Comment Response I.5-1

This comment letter expresses opposition to the potential rezoning of the Glen Annie Golf Course. In particular, the comment letter summarizes the wildlife habitat provided by the golf course and expresses concern for potential impacts to wildlife.

Please refer to Master Response 2.

Alamilla, Breanna

From: P Ten <philipmtennant@gmail.com>
Sent: Wednesday, January 3, 2024 11:02 AM
To: PAD LRP Housing Element
Subject: Housing alternates to Glen Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi,
I emailed you last year about the development of Glen Annie GC; I mentioned Bishop Ranch, which lies fallow, seems to offer virtually everything you might need - except public support. I know it's development was turned down in 2011, though maybe the same opponents back then would be even less happy about Glen Annie GC now. Possibly a smaller portion, say NE corner or other section(s), might be acceptable this time around. Also I noticed further areas nearby:

- 7400 Cathedral Oaks, about 14 acres lying fallow
- 3 acres behind San Felicia Drive, adjacent to 7188 Hollister Ave
- about 5 acres at 7301 Calle Real (near Bassano Dr)

Assuming 10 affordable homes per acre, that's 220 homes or close to 1000 people, and leaving Glen Annie alone for those that truly appreciate it (apparently not the non-golfing planners.)
Best Regards, Philip

I.6-1

Comment Letter I.6 – [Philip Tennant]

Comment Response I.6-1

The comment lists alternative sites to be considered for housing development in place of the Rezone Site No. 11 (Glen Annie).

Please refer to Master Responses 1 and 2.

Alamilla, Breanna

From: delene bliss <delene@att.net>
Sent: Thursday, January 4, 2024 12:50 PM
To: Pullen, Hannah; PAD LRP Housing Element
Subject: Fw: Glenn Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

----- Forwarded Message -----
From: delene bliss <delene@att.net>
To: lcapps@countyofsb.org <lcapps@countyofsb.org>; SupervisorWilliams@countyofsb.org <supervisorwilliams@countyofsb.org>; jhartmann@countyofsb.org <jhartmann@countyofsb.org>; bob.nelson@countyofsb.org <bob.nelson@countyofsb.org>; steve.lavagnino@countyofsb.org <steve.lavagnino@countyofsb.org>
Sent: Thursday, January 4, 2024 at 12:48:54 PM PST
Subject: Glenn Annie Golf Course

Dear Supervisors-

This is the first time I am connecting with all of you as a second-generation Santa Barbara resident. My parents graduated from UCSB in the early 50's and we have been part of this community since then. I have raised my 3 adult children in this community as well.

PLEASE do not approve the housing development on the Glenn Annie property. This is a gem for our community and one we really can't afford to lose. Not only for the recreational value but more importantly the beautiful landscape and hillside this property contains.

I.7-1

There was so much **outcry about UCSB was going to develop the Muger** dorm due to the change in the Goleta Valley and here you are considering the same kind of change just on the other side of the valley. This development will forever change our foothills. You need to consider this environmental aspect.

I believe a few of you may be looking to expand your political futures and this decision will follow you. Please look at what the Newport Coast has done to their ocean foothills and please do not follow in their footsteps.

Please reach out if I can answer any further questions.

Delene Goodell Bliss
805-708-4101

Comment Letter I.7 – [Delene Goodell Bliss]

Comment Response I.7-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its recreational value and landscapes.

Please refer to Master Response 2.

Pullen, Hannah

From: elaine abercrombie <eabercrombiemail@gmail.com>
Sent: Thursday, January 4, 2024 11:10 AM
To: Pullen, Hannah
Subject: KEEP GLEN ANNIE A GOLF CLUB, WHY?

Follow Up Flag: Follow up
Flag Status: Flagged

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Honorable Planner Pullen;

I have been a local Real Estate Broker in the Santa Barbara area since 1986. I know housing inventory has always been an issue and it is becoming even more critical. However, the Glen Annie Golf Club is NOT a PRIME REAL ESTATE site for the housing needed.

A builder will need to spend more money on the foundation of the home since the ground shifts drastically as evidenced by the cart paths needing repair constantly. This is the main reason I feel this site is a poor one for needed housing. In the end the cost of the homes built there will need to be more expensive to purchase and maintain.

I wish Goleta had a community course, have you considered purchasing the course for the City? If Glen Annie is gone, all the golfers in Goleta will be forced to play in Santa Barbara. How much might this cost the City?

In considering your options of where to build the projects you have to build, I think you will agree this site is too unstable for housing.

Thank you for your attention to this matter and your consideration of another site.

I.8-1

Regards,
Elaine Abercrombie
333 Old Mill Road, 174
Santa Barbara, CA 93110
805-450-0086



ReplyForward
Add reaction

Comment Letter I.8 – [Elaine Abercrombie]

Comment Response I.8-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to potential for geology and soil incompatibility.

Please refer to Master Response 2.

Alamilla, Breanna

From: Jim Kibbie <jkibbie@hqintelligence.com>
Sent: Thursday, January 4, 2024 1:37 PM
To: Laura Capps; Supervisor Das Williams; Joan Hartmann; Bob Nelson; Steve Lavagnino; PAD LRP Housing Element; Pullen, Hannah
Subject: Preserve Glen Annie Golf Club

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

1/4/2024

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods.

I.9-1

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration.

Jim Kibbie
jkibbie@hqintelligence.com
805-455-3535
3053 Foothill Rd
Santa Barbara, CA
93105

Comment Letter I.9 – [Jim Kibbie]

Comment Response I.9-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to its community value as a recreational resource and potential impacts to biological resources, wildfire buffers and emergency evacuation, roadway and intersection congestion, and agricultural resources, and zoning conflicts.

Please refer to Master Response 2.

Alamilla, Breanna

From: Pam Rice <pam.rice2@gmail.com>
Sent: Thursday, January 4, 2024 2:18 PM
To: Pullen, Hannah; PAD LRP Housing Element
Subject: Fwd: Glen Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

---------- Forwarded message ---------
From: **Pam Rice** <pam.rice2@gmail.com>
Date: Thu, Jan 4, 2024 at 2:17 PM
Subject: Glen Annie Golf Course
To: <lcapps@countyofsb.org>, <SupervisorWilliams@countyofsb.org>, <jhartmann@countyofsb.org>, <bob.nelson@countyofsb.org>, <steve.lavagnino@countyofsb.org>

January 4, 2024

Dear Supervisor Capps & Board of Supervisors,

I would like to express my strong interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings. I personally play there regularly, both with my friends, but also with my entire family. It is our favorite place to play, and it is a fabulous way to spend a day with my parents, my siblings AND my kids. We all play at Glen Annie regularly.

I.10-1

The Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods.

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

I.10-1 Cont.

Please don't develop our place to play. There really is no other comparable place for golf - Sandpiper is too expensive, Muni is too crowded (and much more crowded if we lose Glen Annie), and Hidden Oaks seems to be gone. Glen Annie is the perfect place to spend time with family and friends.

Thank you for your consideration.

Pam Rice
5193 Walnut Park Drive
Santa Barbara, CA 93111
(805) 403-2280

--
Pam Rice

--
Pam Rice

Comment Letter I.10 – [Pam Rice]

Comment Response I.10-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to its community value as a recreational resource and potential impacts to biological resources, emergency evacuation routes, roadway and intersection congestion, and agricultural resources, and zoning conflicts.

Please refer to Master Response 2.

Alamilla, Breanna

From: Scott Singhass <singhassfamily@gmail.com>
Sent: Thursday, January 4, 2024 12:02 PM
To: PAD LRP Housing Element; Pullen, Hannah
Subject: Preserving Glen Annie Golf Course Open Space
Attachments: Glen Annie Open Space Letter to Supervisors.docx

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Hannah Pullen et al:
County of Santa Barbara Board of Supervisors.

Date: January 4, 2024

To: Laura Capps & Santa Barbara County Board of Supervisors

From: Christina Singhass, 309 Avila Way, SB, 93108, *Santa Barbara County Resident*

SUBJECT: PRESERVING GLEN ANNIE GOLF COURSE OPEN SPACE

I am writing you to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource and open space for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura.

The Glen Annie Golf Club is a key part of the Santa Barbara and surrounding Tri County communities, and is a treasure for community and family events, celebrations, weddings and memorials, to name only a few of the many uses Glen Annie Golf Course serves as a regional venue.

Additionally, Glen Annie Golf Course serves as an affordable and convenient practice and competitive tournament location for all of the Tri-County school students, of all ages. Golf is a lifelong love and sport that can be cultivated by the very young to the very old in the communities.

The Glen Annie Golf Club is a wonderful public resource and an important recreational center for Santa Barbara County, as well as the neighboring counties. The world class golf offerings benefit the community and serve as a destination location to many tourists that visit Santa Barbara County. I.11-1

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, road runners and more. More importantly perhaps, Glen Annie Golf Course serves as a vital fire safety break above Dos Pueblos High School and the adjacent long existing neighborhoods.

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional

traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose dangers to the community at large.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for housing or as a living space.

I.11-1 Cont.

Thank you for your consideration.
Christina Singhass
Santa Barbara Resident, Open Space Enthusiast, Community Member, Female Golfer

Comment Letter I.11 – [Christina Singhass]

Comment Response I.11-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to its community value as a recreational resource and potential impacts to biological resources, emergency evacuation routes, roadway and intersection congestion, and agricultural resources, and zoning conflicts.

Please refer to Master Response 2.

Pullen, Hannah

From: Adrienne Schuele <aschuele805@gmail.com>
Sent: Thursday, January 4, 2024 10:59 PM
To: Pullen, Hannah; Laura Capps; Supervisor Das Williams; Joan Hartmann; Bob Nelson; Steve Lavagnino
Subject: Housing Element - Glen Annie

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board of Supervisor and Ms. Pullin,

re: Glen Annie Golf Course

Glen Annie Golf Course is the Jewel in the Crown of our community.

As a senior citizen I enjoy weekly affordable golf with the ladies at Glen Annie, there are over 100 of us that play on Tuesday afternoons, it is the opportunity to get exercise, breathe the fresh air, socialize and laugh.

There are 1,000's of acres in the area that could provide housing, there is only 1 Glen Annie Golf Course that provides 100's of people each and every week an outdoor experience, with needed exercise and socializing for mental & physical health.

On top of the golf is a much needed place in the Goleta Valley area to have meetings, dinners, weddings and celebrations looking out to nature.

I.12-1

Glen Annie also provides the community's non-profits a venue for important fundraising as many golf tournaments are staged at Glen Annie each year.

You will never duplicate what we have in Glen Annie Golf Course, fresh air, exercise, mental health, community center, social center, event center and Golf for young and old, where else provides such resources to the community in the area?

You can however build housing in many places, even around the golf course, but don't take our important jewel away forever!!!

Warmest Regards,
Adrienne Schuele
4120 Marina Dr, Santa Barbara, CA 93110

Comment Letter I.12 – [Adrienne Schuele]

Comment Response I.12-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community value as a recreational resource.

Please refer to Master Response 2.

Pullen, Hannah

From: Will Beall <Will@beallandburkhardt.com>
Sent: Thursday, January 4, 2024 3:22 PM
To: Steele, Jessica; Marrero, Eva; Pullen, Hannah
Cc: Jeff Martin (glenanniemc@gmail.com)
Subject: Housing element

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Ms. Steele-Blossom, Thomas and Marrero,

Following links from the County newsletter I went into the "tool" https://sbco.abalancingact.com/south-coast allegedly created to allow the public to show what they would
like to comply with the state housing element. There does not seem to be any choice actually given.

First, the County has already approved far more units than mandated, it just has not required them to be lower or moderate income housing units. So the exercise is rigged from the beginning.

My personal interest is Glen Annie golf course, an essential recreational and open space asset for the South County. COVID caused a golfing boom-it is difficult to get a tee time on the local public courses already. I frequently have to travel to Ventura or San Luis Obispo County to play. Golfers lost Ocean Meadows to housing, and lost Ranch San Marcos as well in the past few years. Public courses allow those of us without sufficient resources to join a country club to play golf. I.13-1

Nor is it only the golfers. A flock of geese lived at Ocean Meadows. They have moved to Glen Annie, along with tons of other wildlife-coots, coyotes, roadrunners, egrets, etc., etc, not to mention the famous frogs. In addition, 1000 new units there will cause horrific traffic with the high school across the street, not to mention the freeway offramp, heavily used due to the Camino Real shopping center.

So I went into the balancing act tool and literally checked every other property. It still didn't balance. Oh, there are plenty of units, even enough low income ones. But insufficient moderate income units UNLESS I select Glen Annie, no matter what else I do. This isn't a choice that the public is getting.

I understand the need for housing here, but turning a civic treasure into houses is not the answer.

William C. Beall
Beall & Burkhardt, APC
1114 State Street, Suite 200
Santa Barbara, CA 93101
Phone: (805) 966-6774
Fax: (805) 963-5988

Comment Letter I.13 – [William Beall]

Comment Response I.13-1

This comment letter references the County's Balancing Act Housing Simulation tool and asserts that the County has already approved more units than mandated. The commenter goes on to describe that the Glen Annie golf course serves as an important recreational, open space, and wildlife habitat resource. Finally, the commenter asserts that the balancing act tool would not balance for moderate-income units without Rezone Site No. 11 (Glen Annie).

Please refer to Master Response 2 for a discussion of the analysis of potential environmental impacts associated with the potential rezoning of the Glen Annie Golf Course. Please also note that Chapter 4, *Alternatives* considers Alternative 2 – Sustainable Communities Strategy and Alternative 4 – Reduced Project B, both of which would remove Rezone Site No. 11 (Glen Annie) from consideration for potential rezoning. The Balancing Act simulation tool is updated, as needed, to reflect any new pending project applications received. The Board will select a sufficient number of rezone sites to meet the RHNA plus the 15 percent buffer. The Balancing Act tool shows a feasible housing plan with the exclusion of Rezone Site No. 11 (Glen Annie).

Alamilla, Breanna

From: Linda Greene <linda.greene20@gmail.com>
Sent: Friday, January 5, 2024 10:40 PM
To: PAD LRP Housing Element; Pullen, Hannah
Subject: Glen Annie Golf Club

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

January 5, 2024

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer ,red tail hawks, squirrels, geese, ducks, coots, egrets, crows,
Bobcats, rabbits, snakes, coyotes, and more. It also serves as a safe fire break above Dos Pueblos High School and the adjacent neighborhoods. I.14-1

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration.

Linda Greene
Linda.greene20@gmail.com
Resident of Goleta/Santa Barbara since 1974
Sent from my iPhone

Comment Letter I.14 – [Linda Greene]

Comment Response I.14-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, wildfire risk, emergency evacuation routes, roadway and intersection congestion, and agricultural resources, and zoning conflicts.

Please refer to Master Response 2.

Alamilla, Breanna

From: Norah Dunbar <norahdunbar@live.com>
Sent: Friday, January 5, 2024 11:44 AM
To: PAD LRP Housing Element
Cc: sbcob; Laura Capps; Supervisor Das Williams; Joan Hartmann; Supervisor Nelson; Steve Lavagnino
Subject: Re: Please don't pave over Glen Annie golf course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello, I am just writing to renew my plea that you not re-zone the Glen Annie Golf Course for housing. We cannot lose this natural resource in our area for the reasons I outlined in my email last year.

Norah Dunbar

From: Norah Dunbar
Sent: Tuesday, February 21, 2023 1:25 PM
To: housingelement@countyofsb.org <housingelement@countyofsb.org>
Cc: sbcob@countyofsb.org <sbcob@countyofsb.org>; lcapps@countyofsb.org <lcapps@countyofsb.org>; supervisorwilliams@countyofsb.org <supervisorwilliams@countyofsb.org>; jhartmann@countyofsb.org <jhartmann@countyofsb.org>; nelson@bos.countyofsb.org <nelson@bos.countyofsb.org>; steve.lavagnino@countyofsb.org <steve.lavagnino@countyofsb.org>
Subject: Please don't pave over Glen Annie golf course

Hello. I am an avid golfer and a resident of Santa Barbara. I frequently play at both Santa Barbara Golf Club (known as the Muni) and Glen Annie Golf Club. In fact, I am a 5-time club champion of the women's league at Glen Annie and my son attends Dos Pueblos High School and is a member of the boy's golf team there. Glen Annie is their home course and the players can simply walk across the street to practice or play. Glen Annie has been a wonderful supporter of DPHS golf for many years. The recent proposal to re-zone Glen Annie Golf Course has me very concerned. First of all, there are only two affordable public golf courses in Santa Barbara, the Muni and Glen Annie. Currently, a resident can walk the Muni for $40 and Glen Annie for $48 on a weekday. Sandpiper is also public but is much more expensive ($85 to walk on a weekday) for the average golfer which puts it out of reach for regular players. These two courses are always busy and provide affordable recreation for the people of Santa Barbara County. I play at least twice a week, often with my son, and I see many families out there enjoying the outdoors with their kids. If Glen Annie were to close, most of the golfers would play the Muni because of its more affordable price and it would be nearly impossible to get tee times as it is already in very high demand. Some people will be forced to pay the much higher prices at Sandpiper and would likely play less. The DPHS golf team would lose their home course. We simply don't have enough public courses in Santa Barbara to lose one. I.15-1

Of course, as a resident of Santa Barbara, I recognize our acute housing shortage and the reason the Glen Annie Golf Course was targeted for re-zoning. There are many other solutions to our housing crisis that don't involve paving over green space. The environmental loss of a large open space to be turned into housing with little green space cannot be the answer. Today's LA Times had an article about the fact that so little of our rainwater in Southern California is collected and absorbed into the ground that we can't afford to lose a large turf area like a golf course. It is home to many species of birds and other wildlife and helps retain water. Turf

absorbs rainwater and prevents topsoil erosion whereas a housing development with parking lots and roads would simply create more water loss for our area. Golf courses also keep the temperature and pests down compared to development. We simply can't afford to lose such a large and valuable greenspace.

For a summary of the benefits of golf both for people and the environment, I hope you will read this article from the USGA summarizing decades of research on the subject: https://www.usga.org/course-care/water-resource-center/golf-courses-benefit-people-and-wildlife.html

I.15-1 Cont.

I thank you for your attention and hope another housing solution can be found.

Sincerely,

Norah E. Dunbar, Ph.D.

Comment Letter I.15 – [Norah Dunbar]

Comment Response I.15-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value as well as the site's existing biological resources and function for groundwater recharge. The comment references an article by the Los Angeles Times relating to rain and groundwater recharge in Southern California. The comment also includes a link to an article by the United States Golf Association that describes the benefits of preserving golf courses as green spaces. The comment does not address the adequacy of the environmental impact analysis provided in the Draft EIR.

Please refer to Master Response 2.

Alamilla, Breanna

From: Salli Eve <sallieve@gmail.com>
Sent: Friday, January 5, 2024 12:14 PM
To: Laura Capps; Joan Hartmann; SupervisorWilliams@countyofsb.orgbob; Steve Lavagnino; Bob Nelson; PAD LRP Housing Element; Pullen, Hannah
Subject: Glen Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

1/6/24

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods.

I.16-1

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Adding this many new residents to Goleta would also cause incredible traffic and delays at the Firview/Calle Real intersection.Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration.

Salli Eve
5910 Berkeley Road
Goleta, CA 93117

Comment Letter I.16 – [Salli Eve]

Comment Response I.16-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, wildfire risk, emergency evacuation routes, roadway and intersection congestion, and agricultural resources, and zoning conflicts.

Please refer to Master Response 2.

Alamilla, Breanna

From: Jacqui Page <pagejacqui@msn.com>
Sent: Monday, January 8, 2024 2:33 PM
To: PAD LRP Housing Element; Pullen, Hannah
Subject: Save Glenn Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I am one of a very large group of more than 85 women who play golf at Glenn Annie every Tuesday. It is something that we look forward to every week. It is our saving grace in all of our busy lives that are full of stress with work and kids and so many other responsibilities. It is a wonderful way to meet new people and bond. PLEASE help us keep our sanity and do not take our recreation away!
Sent from my iPhone

I.17-1

Comment Letter I.17 – [Jacqui Page]

Comment Response I.17-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value.

Please refer to Master Response 2.

Alamilla, Breanna

From: Jacqui Page <jacquipage4@gmail.com>
Sent: Monday, January 8, 2024 3:17 PM
To: Pullen, Hannah; PAD LRP Housing Element
Subject: Glenn Annie Golf Course. ONCE ITS GONE, IT IS GONE FOREVER!

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I am extremely disturbed that Glenn Annie Golf Course could possibly be considered for housing! This would be very bad judgement for so many reasons! First, everyone agrees that the 101 ramps at Glenn Annie are beyond capacity! Adding more traffic would be disastrous for the community! There are so many better and smarter options. Glenn Annie is a jewel for the county. One only needs to see all the wildlife, deer, geese, coyotes that call this beautiful area home. Talk to all the people who play golf here and love it and it is affordable! Santa Barbara County is seriously lacking in healthy recreation and taking this away from us would be a tragedy! Remember, ONCE IT IS GONE, IT IS GONE FOREVER!
Sent from my iPhone

I.18-1

Comment Letter I.18 – [Jacqui Page]

Comment Response I.18-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources and roadway and intersection congestion.

Please refer to Master Response 2.

January 8, 2024

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods. I.19-1

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing. Please keep it as the recreation and open space resource sorely needed in the Santa Barbara/Goleta environs.

Thank you for your consideration.

Kathleen D Sullivan
333 Old Mill Rd. Spc. 234
Santa Barbara, CA 93110

Comment Letter I.19 – [Kathleen D. Sullivan]

Comment Response I.19-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning incompatibility.

Please refer to Master Response 2.

Alamilla, Breanna

From: Jacqui Page <pagejacqui@msn.com>
Sent: Tuesday, January 9, 2024 8:39 AM
To: PAD LRP Housing Element; Pullen, Hannah
Subject: Glenn Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I am a concerned Santa Barbara tax payer and property owner who is writing in hopes that Glenn Annie Golf Course will be saved from housing development. I am especially worried that our youngsters do not have enough outdoor activities away from their cell phones. Glenn Annie Golf Course is an affordable and safe option for our children. It teaches skills, patience and bonding. We have too many children that are just one step away from trouble! Why in the world would anyone want to take this away from us and our children??? Please help save Glenn Annie Golf Course for all of our community! I.20-1

Sent from my iPhone

Comment Letter I.20 – [Jacqui Page]

Comment Response I.20-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value.

Please refer to Master Response 2.

Alamilla, Breanna

From: Ruston Calmes <rcalmes@containeralliance.com>
Sent: Tuesday, January 9, 2024 3:21 PM
To: Laura Capps; Supervisor Das Williams; Joan Hartmann; Bob Nelson; Steve Lavagnino; PAD LRP Housing Element; Pullen, Hannah
Subject: Glen Annie Golf Club and Rezoning for Housing

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisor Capps & Board of Supervisors,
I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara The Glen Annie Golf Club is a part of our community and one of the main reasons I moved to Goleta.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings. I enjoy bringing my (2) young sons there so they can learn the game. I always bring family and friends in from out of town to this course to show them the beauty that is Glen Annie.

The Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods. I.21-1

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration. Please keep Glen Annie a Golf Course!!!

Ruston Calmes
Golf and Nature Enthusiast

Ruston Calmes
National Sales Manager

Email:	rcalmes@containeralliance.com
Toll Free:	(800) 386-2345
Office:	(805) 456-3779
Cell:	(805) 886-9335

800-386-2345

Container conditions explained
Delivery Information

Comment Letter I.21 – [Rustun Calmes]

Comment Response I.21-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning incompatibility.

Please refer to Master Response 2.

Pullen, Hannah

From: Lisa French <lisa.french777@gmail.com>
Sent: Friday, January 12, 2024 8:43 PM
To: Pullen, Hannah; PAD LRP Housing Element; Supervisor Das Williams
Subject: Pending Rezoning for Santa Barbara County Housing Element

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

11 January 2024

Dear Supervisor Williams & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as a continuing community recreation resource, it is a unique part of our community.

Before becoming a weekly golfer I enjoyed business lunches and gatherings at the restaurant. As a golfer I appreciate the world class golf the site offers to not only the community, but also the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and community gatherings.

Glen Annie Golf Club site is not an appropriate site to rezone for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats for deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods. Local residents are having their homeowners insurance policies cancelled due to fire risk, if homes are constructed the owners will be challenged to insure their investment. I.22-1

The traffic in the area is of concern as the Storke Road 101 exit is presently heavily traveled and the addition of hundreds more vehicles on the route will create unsafe conditions. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the with thousands of added daily trips at that intersection would increase traffic risks and challenges to the area. Emergency and fire evacuation routes for the area will be severely stressed with the quantity of new homes under consideration.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration.

Elizabeth French
1005 Winther Way
Santa Barbara CA 93110

Comment Letter I.22 – [Elizabeth French]

Comment Response I.22-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning incompatibility.

Please refer to Master Response 2.

Alamilla, Breanna

From: Michael Morrison <murrypage3@gmail.com>
Sent: Friday, January 12, 2024 8:40 AM
To: PAD LRP Housing Element
Subject: Glen Annie Golf Club and Rezoning for Housing

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

DATE: 01/12/2024

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods. I.23-1

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration.

Michael Morrison
767 Cathedral Pointe Ln
Santa Barbara, Ca 93111

Comment Letter I.23 – [Michael Morrison]

Comment Response I.23-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning incompatibility.

Please refer to Master Response 2.

Alamilla, Breanna

From:	Jan Lam <jan.lam_13@yahoo.com>
Sent:	Sunday, January 14, 2024 9:02 PM
To:	Laura Capps; Supervisor Das Williams; Joan Hartmann; Bob Nelson; Steve Lavagnino; PAD LRP Housing Element
Subject:	Please preserve Glen Annie Golf Club

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Jan. 14, 2024

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings. I play golf there at least 4 times per month, sometimes more often than that! My friends and I treasure our time playing at Glen Annie Golf Club and it would leave a giant void for recreational golf in our area if taken away.

I.24-1

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, hawks, rabbit, snakes, coyotes, and more. I just recently saw a road runner run across our path. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods.

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

I.24-1 Cont.

Thank you for your consideration.

Janine Lambe
Retired M.E.

Sent from my iPhone

Comment Letter I.24 – [Janine Lambe]

Comment Response I.24-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning incompatibility.

Please refer to Master Response 2.

Alamilla, Breanna

From: insidewinesantabarbara@yahoo.com
Sent: Sunday, January 14, 2024 11:16 AM
To: PAD LRP Housing Element
Subject: do not develop housing at Glenn Annie--keep it a golf course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Hannah,

Golf is a healthy recreational activity enjoyed by many Santa Barbara residents, including myself. In the 20 years I've lived here, we lost Ocean Meadows Golf Course and Twin Lakes is so minimally maintained as to be unplayable.

Please don't put housing into Glenn Annie! When Ty Warner redevelops Sandpiper Golf Course in 2026, we will be left with only the Santa Barbara Municipal Golf Course. Please don't take this sport, so important to so many of us, away!

I recognize the need for more housing. But there is the empty Macy's downtown and next to UCSB (on the Coal Point side) is a complex of empty buildings. Do you know what this is and why it is empty? Why not develop housing there, expecially for students. I read that many of them are renting closets or living in their cars.

Could the land below SBCC be used for housing? That would certainly help enrolment, which I heard was down over 60% because out-of-town students can't find can't find a place to live.

I.25-1

Thank you, Tama

Tama Takahashi
Inside Wine Santa Barbara
www.meetup.com/inside-Wine-Santa-Barbara
805-302-0565



Comment Letter I.25 – [Tama Takahashi]

Comment Response I.25-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value. The commenter also offers alternative sites for housing development including the Macy's site in Downtown City of Santa Barbara, and an empty building complex next to the University of California, Santa Barbara (UCSB), and land below Santa Barbara City College.

Please refer to Master Response 2 regarding the treatment of potential environmental impacts associated with rezoning of the Glenn Annie Golf Course. Please also note that the County must accommodate housing on unincorporated lands in order to meet the RHNA plus a 15-percent buffer. As with each of the incorporated cities within the county, the City of Santa Barbara is responsible for accommodating their own RHNAs on incorporated lands.

Alamilla, Breanna

From: Jan Lam <jan.lam_13@yahoo.com>
Sent: Sunday, January 14, 2024 9:27 PM
To: Pullen, Hannah; PAD LRP Housing Element; Laura Capps; Supervisor Das Williams; Joan Hartmann; Bob Nelson; Steve Lavagnino
Subject: Please preserve Glen Annie GC

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Jan. 15, 2024

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, hawks, rabbit, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods. I.26-1

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration.

Janine Lambe

Golf enthusiast

Sent from my iPhone

Comment Letter I.26 – [Janine Lambe]

Comment Response I.26-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning incompatibility.

Please refer to Master Response 2.

Alamilla, Breanna

From: Maria Martinez <martinezmaria70@icloud.com>
Sent: Tuesday, January 23, 2024 6:54 PM
To: PAD LRP Housing Element
Subject: Affordable housing

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I would like to receive information regarding the pending affordable housing been build next year in Santa Barbara. I been communicating for the last 19 years from Oxnard to work at Sansum in Santa Barbara. It would be nice to be able to afford to live where I work. I.27-1

Comment Letter I.27 – [Maria Martinez]

Comment Response I.27-1

The comment requests to be included on the County's contact list received information regarding pending affordable housing projects to be built in Santa Barbara.

Please refer to Master Response 1. While these comments do not pertain to the adequacy of the environmental impact analysis provided in the EIR, they have been noted and will be forwarded to County decision makers for their consideration.

Alamilla, Breanna

From: Frank Spada <fwspada@gmail.com>
Sent: Tuesday, January 23, 2024 1:37 PM
To: PAD LRP Housing Element
Subject: Comments on the proposed Housing Element Program

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello Hannah,
Thank you for accepting comments on this. I can't imagine all of the work that has gone into this process. My comments are regarding the properties between hwy. 217 and Turnpike Rd along Hollister Ave. I strongly oppose rezoning these parcels. There is a reason that the East Goleta Valley community plan exists. Ag land is not to be rezoned under that plan and that should be final. The same goes for the portion of More Mesa that is listed under the county owned sites that could be rezoned. Open Space and Ag land are precious resources that should be protected and fought for. There are plenty of areas between the 101 and Hollister in Goleta that should be available and are providing no benefit to the community. These areas are prime for more hosing. Not Ag land and Open Spaces! Don't forget why this plan was created! https://www.countyofsb.org/924/Goleta-Valley-Planning-Area

I.28-1

Thank you,
Frank Spada
93111

Comment Letter I.28 – [Frank Spada]

Comment Response I.28-1

This comment expresses opposition to rezoning and housing development on parcels located between SR 217 and Turnpike Road due to potential policy inconsistencies with the Eastern Goleta Valley Community Plan.

Please refer to Master Response 3.

Alamilla, Breanna

From: Ellen Jackson <ellenj@cox.net>
Sent: Tuesday, January 23, 2024 11:27 AM
To: PAD LRP Housing Element
Subject: Proposed developments via builder's remedy

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I've been a resident of Santa Barbara since 1979. I'm also a teacher and writer of environmental books for children. I'm appalled by a recent series of proposals from housing developers that will result in the deterioration of our beautiful city.

I'm referring specifically to "the builder's remedy", an insane piece of legislation that gives developers a backdoor means to subvert the review process.

As you know, fourteen of these projects have already been proposed that, in total, would add 5,000 units to our already overcrowded community.
But, apparently, only a small minority will be made available to low-income or working class families.

I.29-1

Santa Barbara, Goleta, and Carpinteria already suffer from severe water shortages. These will only increase in the future. Where will the extra water for all these new projects come from? Carolee Krieger, executive director of California Water Impact Network, says that "for all practical purposes, our drought is permanent."

Moreover, the additional population will further overburden our traffic, pollution, environmental, and medical facilities

It's clear that Santa Barbara has a severe housing shortage with an extremely limited number of affordable units. But the answer is NOT for our representatives to give in to the developers who want to build bigger, more densely packed housing as quickly as possible.

I urge you to use every legislative and regulatory tool available to you to stop this offensive assault on Santa Barbara.

Thank you.

Ellen Jackson
1430 Pacific Avenue
Santa Barbara, CA 93109
805-724-9424

--
"If you're not in denial, you're not paying attention."- Nick Welsh

Comment Letter I.29 – [Ellen Jackson]

Comment Response I.29-1

The comment expresses opposition to the pending builder's remedy projects.

Please refer to Master Response 4.

Alamilla, Breanna

From:	Hymon Johnson <htjohnson09@gmail.com>
Sent:	Wednesday, January 24, 2024 1:59 PM
To:	PAD LRP Housing Element; Supervisor Das Williams; Gregg Hart; Joan Hartmann; Bob Nelson; Steve Lavagnino; laura@lauracapps.com
Cc:	Perotte, P; Kyle Richards; Stuart Kasdin; James Kyriaco; Luz Reyes-Martin; pimhof@cityofgoleta.org
Subject:	Comment on Housing Element Compliance

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Chairperson and Members, Santa Barbara County Board of Supervisors

Very much aware of the vast variety of constraints, conflicting concerns, and lobbying you have faced, we are simply writing to thank you and your staffs for your long, hard, and diligent work in addressing the Santa Barbara County Housing Element.

There is little need to mention that playing the role of community steward in these strange days of increasing indifference and amorality requires dedicated commitment to human values and faithful consistency in reflecting sincere and authentic servant leadership. I.30-1

We respectfully count on your devotion to basic human goodness in decision making, and in supporting those who need support, and have fewer tools and options to provide for their own better being. As you know all too well, the gap in wherewithal for beneficial self-determination and expansion is notably broad in our incredibly diverse and wonderful county.

Peace and best wishes to you and to All,

(Signed)
Hymon T. Johnson, Emeritus Professor and former vice president and trustee, Goleta Union School District and Crane Country Day School
Juanita H. Johnson, Retired Goleta Educator
Gaye Theresa Johnson, Associate Professor, UCLA (formerly UCSB) and former board president of Central Coast Alliance for A Sustainable Economy

Comment Letter I.30 – [Hymon Johnson]

Comment Response I.30-1

The comment thanks the Board of Supervisors for their dedication. This comment has been noted and will be forwarded to County decision makers for their consideration.

Alamilla, Breanna

From: Frank Spada <fwspada@gmail.com>
Sent: Wednesday, January 24, 2024 9:23 AM
To: PAD LRP Housing Element
Subject: Re: Comments on the proposed Housing Element Program

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi Breanna
Thanks for your response yesterday. I feel like the new plan is alot like the original plan where an unfair proportion of the county development is in the Eastern Goleta area. The original plan came out, we called out the abundance of development in one area, the map changed and the development was spread out fairly to areas like Santa Barbara and Montecito. Now the final map comes out and it looks like the original map. This is very concerning and I feel like our comments are not being heard. Here are my original comments from a few months back when the original plan was presented. Please accept them again.

Please oppose the rezoning of the agricultural lands near the Santa Barbara Airport for these reasons:
1) Rezoning this land is in clear violation of Santa Barbara County's Eastern Goleta Valley land use and development policies.
2) The area is directly in the flight zone of the airport.
3) It's a flood zone and the creeks are full of sensitive habitat.
4) Developing this land to meet state needs puts an unfair proportion of the counties' needed development in one place.
5) The roads in the area already have enough traffic and this will make it worse.
Thank you,
Frank Spada

I.31-1

On Tue, Jan 23, 2024 at 2:28 PM PAD LRP Housing Element <housingelement@countyofsb.org> wrote:

> Dear Frank,
>
> Thank you, we have received your comment on the 2023-2031 Housing Element Update Draft Program EIR. I have forwarded your comment to the project planner, Hannah Thomas. The County will provide a written response to your comment, which will be available in the Final Program EIR, once released.
>
> Thank you,

Comment Letter I.31 – [Frank Spada]

Comment Response I.31-1

The Comment expresses opposition to rezoning and housing development within the Eastern Goleta Valley area due to impacts associated with site development and potential policy inconsistencies relating to conversion of agricultural lands, land use incompatibility, airport safety hazards, traffic congestion, flood hazards, and biological resources.

Please refer to Master Response 3.

Alamilla, Breanna

From: C Colao <colaodesign@sbcglobal.net>
Sent: Wednesday, January 24, 2024 5:51 PM
To: PAD LRP Housing Element
Subject: Fwd: Santa Barbara -- an Up and Coming District of Los Angeles?

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Hannah Thomas,

I sent this to the list of recipients you will see in the "To" area. Governor Newsom's was successfully sent using a form on the State Gov site.
I hope this helps in limiting carte blanche to developers bypassing the EIR and or CEQA under the Builders Remedy.

The Mission project may not be in the County's jurisdiction; however, I'd like my voice heard for being against the Builders Remedy for any area in the County jurisdiction.

Thank you and with all respect,

Carol Colao

Begin forwarded message:

> **From:** C Colao <colaodesign@sbcglobal.net>
> **Date:** January 23, 2024 at 4:15:34 PM PST
> **To:** sbcob@countyofsb.org, SBCityCouncil@santabarbaraca.gov, Clerk@santabarbaraca.gov, senator.limon@senate.ca.gov, assemblymember.hart@assembly.ca.gov, gavin.newsom@gov.ca.gov
> **Subject: Santa Barbara -- an Up and Coming District of Los Angeles?**
>
> Dear Members of the City Council, Mayor Rowse, Board of Supervisors, Assemblymember Hart, Senator Limón, and Governor Newsom,
>
> I respect your busy schedules and will keep this as concise and to the point as I can. Please indulge me in reading through this with your utmost attention.
>
> Sluggish action and missed deadlines, to submit plans for housing element requirements, sure got us in a non-compliant pickle. Because of this we have development plans, bolstered by the impending use of the Builder's Remedy, to fast track through the review process and bypass CEQA reviews. This fast-tracked push for development is causing much angst amongst residents who fear that neighborhoods, sense of community, and quality of life is threatened. I.32-1
>
> I am not a NIMBY and realize the mandate for more housing will not ebb. I support the projects that will be most effective with as little disruption as possible. I have been reading about other areas in the state. The most successful, and supported, areas for development are near transit

hubs — busses, trains, ferries and BART (in some areas), and areas where there is retail/restaurants for people to walk to or Uber or Lyft, taxis, etc. to get to and from these, more utilized, areas.

Therefore, I support the under-utilized La Cumbre/Hope "Neighborhood" project development, for one, because it will provide the ability to walk to shopping, restaurants, etc and easy access to public transportation.

However, our **Historic Mission Canyon**, a most sacred area in Santa Barbara, is jeopardized. I am, specifically, referring to the significant historic property that was once a religious retreat called Mount Calvary Monastery at 505 E. Los Olivos (APN 025-150-009). The preliminary plans, applied for under SB330 (the Builders Remedy), plans to demolish the existing structures and landscape. It will cause irreparable damage to this special and beloved area. It is now owned by an out-of-town entity (LA developers Craig and Stephanie Smith) who propose to demolish two stately homes and replace with two large apartment buildings totaling 560 units. This property is listed on the City's Historic Resources List and Historic Cultural Landscapes. The whole of the property is of Historic Landmark caliber and is one of the ever-disappearing places left, in our city, that is unique, warming our souls with its rustic and natural beauty.

I.32-1 Cont.

This property and area around the Old Mission needs — no, demands — preservation. Furthermore, the proposed project will add a significant number of cars on narrow roads as this area is car-dependent and, because of limited parking requirements within the development, will overflow onto neighborhood streets not equipped for this barrage of cars and population. The destruction of the area's history, the addition of cars and limited parking, is only scratching the surface of the negative impacts this area will undoubtedly face. Most importantly Mission Canyon is a high fire area and a development of this size will make evacuation nearly impossible.

I would hope that the city governing members — the stewards of this precious land — and the State of California will respect and preserve the historic area of the Old Mission and its environs. **I ask that you make it so by exempting this property from the damaging Builder's Remedy**.

Please do not allow Santa Barbara to be destroyed and lose its unique character.

Save our sacred and beautiful Mission Canyon from the interests of developers!

With respect,

Carol Colao
Resident of Santa Barbara
408-313-4736
colaodesign@sbcglobal.net

Comment Letter I.32– [Carol Colao]

Comment Response I.32-1

The comment expresses opposition to a pending builder's remedy project. However, the project referenced by the commenter is located within the City of Santa Barbara and is not part of the County's purview or scope of the proposed Project.

With regard to pending builder's remedy project applications located within the unincorporated areas of the County, please refer to Master Response 4.

Alamilla, Breanna

From: Brandy Zender <brandy.zender@gmail.com>
Sent: Wednesday, January 24, 2024 4:33 PM
To: PAD LRP Housing Element
Subject: STVR and housing availability

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi,
I live in the coastal zone of Santa Barbara in the Arroyo Burro area. We are inundated by 7 STVR in our small neighborhood and three of those surround my property line. Most of these homes are for pure investment purposes with high dollar rental rates posting at 44k/month - but rented nightly.

This was a once quiet family residential zone that has turned into a hotel zone due to the allowance of these STVR in our neighborhood. My direct neighbor who purchased the home in July 2023 as a pure STVR financial investment is looking to add an AUD to increase his profit and ability to bring in even more people into the property.

I.33-1

My question is what is being done to address the massive amount of disruption these STVR have brought to our neighborhoods? Including the allowance of AUD for STVR. These STVR are also impacting hotel occupancy and tourist dollars and taxes being spent in SB.

Addressing these sorts of homes and allowing them to be available for long term renter or the homes even being bought by locals who contribute to Santa Barbara and the neighborhood should be considered in this whole picture of the housing issue we are facing.

Thank you for taking your time to address this topic as I am far from the only person in the coastal zone of SB who has concerns and who is being run out of the home we purchased.

Brandy Zender
3210 Braemar Dr, 93109

Comment Letter I.33– [Brandy Zender]

Comment Response I.33-1

The comment expresses concern for short-term vacation rental properties, particularly within the Coastal Zone.

As described in Chapter 2, *Project Description,* the Housing Element Update involves the implementation of a land use plan and implementation of policies that would facilitate future residential development in a manner necessary to meet the County's RHNA plus a 15 percent buffer for lower- and moderate-income households. One of these policies, Program 19 – Short-Term Rentals, would involve the development of a Short-Term Rental (STR) Program for the Coastal Zone that seeks to balance the provisions of affordable recreational lodging as directed by the California Coastal Commission and the preservation of housing for the local workforce.

Dear Santa Barbara County supervisors and planning commission.

As member of the community for 35 years I sincerely hope that Glen Annie Golf Club will NOT be considered for rezoning and redevelopment. I know you have heard the usual veto element because of traffic, water, an up and running recreational facility, and the Property not being a site that is conducive to low-income housing and most of the applicants will be just relocating from within the city. I will just pick one subject so the email may be read and taken under advisement.

I play At Glen Annie Golf Course at least 2 times a week. The wild life there is very special. Glen Annie is the home to a family of four red tail hawks that grace the skies and prosper because of the excellent food sources available. They had given birth in the trees in the upper parking lot and have made it their home. Next a family of four dear grace our driving range area for grass to eat and the area within the property of Glen Annie has the necessary foulage to provide security from any predator's. In addition, A small but very intriguing animal are two road runners. Also, not to mention the coyotes, Squaerls and snakes that call Glenn Annie home. In final, Glen Annie hosts every winter a migration of Canadian Geese that find safety in the lakes of Glen Annie. Also, not to mention the ducks and mud hens. I.34-1

I know this may be trivial in regards of considering Glen Annie as a redevelopment site but I cannot help wondering what will happen to the community of this sort that will be evicted, forced from their land or parish all together. Unfortunately, the act of outside pressure that is based on a general concept for the state verses each city or county being the judge on its available spaces to grow.

Thank you for your time and consideration,

A member of your community but may be short lived!

RECEIVED
JAN 29 2024
S.B. COUNTY
PLANNING & DEVELOPMENT

Comment Letter I.34– [Anonymous]

Comment Response I.34-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and due to the potential for significant impacts to biological resources.

Please refer to Master Response 2.

Alamilla, Breanna

From: brian brianbailey.com <brian@brianbailey.com>
Sent: Tuesday, January 30, 2024 4:14 PM
To: PAD LRP Housing Element; Pullen, Hannah
Subject: Housing Element Update - Glen Annie Golf Course Inclusion

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Hannah:

I attended supervisor Hartmann's presentation at the DPHS Library last night on the inclusion of the Glen Annie Golf Course. I understand that sending you a note is the forum for providing public comment on the Housing Element Update for the County of Santa Barbara.

My comment has to do with the inclusion of the Glen Annie Golf Course property in the properties under consideration for satisfying the State of California's mandated housing requirements. This site is the least appropriate site among the 18 sites under consideration.

The proposed development of this site is an egregious example of the poorest type of urban planning. The proposed development consists of thousands of homes to be built on a site that is zoned for agriculture and which lies at the edge of urban development. This is atypical urban planning because it is unsound. Hopscotching densities is bad planning. It is like proposing developing the Naples area in Gaviota with thousands of homes.

Development of this site would also create additional traffic nightmares among other extremely negative infrastructure and environmental impacts. Traffic is already terrible with Dos Pueblos High School traffic deadlocked every day. Sometimes it is backed up on Storke Rd. to the freeway. This traffic situation is compounded by the hundreds of massive trucks hauling sand and other construction materials over Cathedral Oaks between Glen Annie and Winchester Canyon Dr. from the county approved Santa Barbara Sand and Topsoil mining operation on Ellwood Canyon Rd.

I.35-1

The Glen Annie Golf Course site lies on a border of the City of Goleta. It would cause the City of Goleta to shoulder all the burdens of this massive development with the revenue benefits accruing to the County of Santa Barbara. It is easy to understand why the County of Santa Barbara included this site. It is an inappropriate site for inclusion and is patently unfair to the City of Goleta.

We don't want to hear about how helpless the county is in resisting the housing mandates of the state of California. We want a more appropriate site or sites chosen to fulfil state housing mandates.

Sincerely,

Brian Bailey

805-637-1031 Ofc./Text
805-603-1031 Fax

Brian@BrianBailey.com
www.BrianBailey.com

Please consider the environment before printing this email.

Comment Letter I.35 – [Brian Bailey]

Comment Response I.35-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to potential impacts to roadway and intersection congestion, impacts associated with development, and planning and zoning conflicts.

Please refer to Master Response 2.

Alamilla, Breanna

From: Frank Spada <fwspada@gmail.com>
Sent: Tuesday, January 30, 2024 6:16 AM
To: PAD LRP Housing Element
Subject: Housing comments

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello Breanna,

Below is my email from the previous comment period. I would like to have it added to this comment period.

Hello Breanna,
The thought of the ag land in Noleta being rezoned keeps me up at night. It's such a precious thing that we have and must be protected. I feel that the city of Goleta is handling this well with their focus on "prioritizing urban infill and containing sprawl, encouraging mixed use, walkability, and transit/alternative transportation connectivity in line with good planning principles." Ag land, open spaces and heavily used recreational areas should not be considered for housing. These areas are the true character of our area and the reason we love to live here.

Please oppose the rezoning of the agricultural lands in Noleta and near the Santa Barbara Airport for these reasons:

1) Rezoning this land is in clear violation of Santa Barbara County's Eastern Goleta Valley land use and development policies.

2) The area is directly in the flight zone of the airport.

3) It's a flood zone and the creeks are full of sensitive habitat.

4) Developing this land to meet state needs puts an unfair proportion of the counties' needed development in one place.

5) The roads in the area already have enough traffic and this will make it worse.

6) We also don't have the water to support this level of development.

7) The Goleta/Santa Barbara area is a narrow strip of land wedged between the mountains and the ocean. We don't have the land space to accommodate massive development and growth without becoming overcrowded.

I don't know if comments are being accepted right now, but I just have to keep speaking up.

Thank you,

Frank Spada

I.36-1

Comment Letter I.36 – [Frank Spada]

Comment Response I.36-1

The comment expresses opposition to consideration of rezoning and housing development within the Eastern Goleta Valley area due to impacts associated with site development and potential policy inconsistencies relating to the conversion of agricultural lands, loss of prime soils, land use incompatibility, airport safety hazards, traffic and intersection congestion, flood hazards, loss of biological resources, and water supply concerns.

Please refer to Master Response 3.

Alamilla, Breanna

From: Jo Kavanagh-Payne <jkpayne@foothillentertainment.com>
Sent: Tuesday, January 30, 2024 7:18 PM
To: lcapps@countryofsb.org; Supervisor Das Williams; Joan Hartmann; Bob Nelson; Steve Lavagnino; Pullen, Hannah; PAD LRP Housing Element
Subject: Glen Annie Golf Club Proposed Rezoning Development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels and with huge history of employment. My husband and I came to Santa Barbara over 24 years ago, and Glen Annie is the reason I took up golf having my first lesson there Jan 2000!

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods.

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

I.37-1

Thank you for your consideration.
Joanne Payne
President - LPGA Amateurs, Santa Barbara Chapter
President – Foothill Entertainment, Inc

T: 805.965.4488 x102 M: 805 637 6054
E: jkpayne@foothillentertainment.com
Web: www.foothillentertainment.com

Comment Letter I.37 – [Jacqui Page]

Comment Response I.37-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts associated with biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning inconsistencies.

Please refer to Master Response 2.

Alamilla, Breanna

From: Sheri Dean <sherildean60@gmail.com>
Sent: Tuesday, January 30, 2024 8:03 PM
To: PAD LRP Housing Element; Laura Capps; Supervisor Das Williams; Joan Hartmann; Bob Nelson; Pullen, Hannah; Steve Lavagnino
Subject: Opposition to Rezoning of Glen Annie Golf Club Land

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods.

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration.

Sheri Dean
Santa Barbara

I.38-1

Comment Letter I.38 – [Sheri Dean]

Comment Response I.38-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts associated with biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning inconsistencies.

Please refer to Master Response 2.

Pullen, Hannah

From: Cindy Hann <cmhann@gmail.com>
Sent: Wednesday, January 31, 2024 8:04 AM
To: Pullen, Hannah
Subject: My two cents

Follow Up Flag: Follow up
Flag Status: Flagged

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I.39-1

To whom it may concern,

As a Goleta resident, I am opposed to the high-density housing project proposed at the beautiful Glenn Annie Golf course. It seems incompatible with the rural nature of the area and will have too great an impact on our infrastructure.

Thank you,
Cindy Hann

Comment Letter I.39 – [Cindy Hann]

Comment Response I.39-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to the potential for incompatibility with the rural nature of the area and impacts to existing infrastructure.

Please refer to Master Response 2.

Alamilla, Breanna

From: Iskren Azmanov <iazmanov48@abv.bg>
Sent: Wednesday, December 20, 2023 12:24 PM
To: PAD LRP Housing Element
Subject: Re: Housing Element Draft Program EIR and Housing Simulation Release

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

100%

I.40-1

>-------- Оригинално писмо --------
>От: "County of Santa Barbara" housingelement@countyofsb.org
>Относно: Housing Element Draft Program EIR and Housing Simulation
>Release
>До: iazmanov48@abv.bg
>Изпратено на: 20.12.2023 22:01

>
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> \.abv-omExternalClass\ \.e2ma-template\ h1 { margin: 0; padding: 0;
> border: 0; font-size: 100.0%; font: inherit; vertical-align: baseline;
> } \.abv-omExternalClass\ \.e2ma-template\ h1 { font-family: Arial,
> Helvetica, sans-serif; font-size: 26px; font-weight: normal; color:
> #333333; } \.abv-omExternalClass\ \.e2ma-template\ h2 { font-family:
> Arial, Helvetica, sans-serif; font-size: 18px; font-weight: normal;
> color: #333333; } \.abv-omExternalClass\ \.e2ma-template\ h3 {
> font-family: Arial, Helvetica, sans-serif; font-size: 14px;
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>
> Housing Element Draft Program EIR and Housing Simulation Release

Comment Letter I.40 – [Iskren Azmanov]

Comment Response I.40-1

This comment does not address the proposed Project or comment on the adequacy of the EIR. Nevertheless, this comment has been noted and will be forwarded to County decision makers.

Alamilla, Breanna

From: brian brianbailey.com <brian@brianbailey.com>
Sent: Tuesday, January 30, 2024 4:14 PM
To: PAD LRP Housing Element; Pullen, Hannah
Subject: Housing Element Update - Glen Annie Golf Course Inclusion

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Hannah:

I attended supervisor Hartmann's presentation at the DPHS Library last night on the inclusion of the Glen Annie Golf Course. I understand that sending you a note is the forum for providing public comment on the Housing Element Update for the County of Santa Barbara.

My comment has to do with the inclusion of the Glen Annie Golf Course property in the properties under consideration for satisfying the State of California's mandated housing requirements. This site is the least appropriate site among the 18 sites under consideration.

The proposed development of this site is an egregious example of the poorest type of urban planning. The proposed development consists of thousands of homes to be built on a site that is zoned for agriculture and which lies at the edge of urban development. This is atypical urban planning because it is unsound. Hopscotching densities is bad planning. It is like proposing developing the Naples area in Gaviota with thousands of homes.

Development of this site would also create additional traffic nightmares among other extremely negative infrastructure and environmental impacts. Traffic is already terrible with Dos Pueblos High School traffic deadlocked every day. Sometimes it is backed up on Storke Rd. to the freeway. This traffic situation is compounded by the hundreds of massive trucks hauling sand and other construction materials over Cathedral Oaks between Glen Annie and Winchester Canyon Dr. from the county approved Santa Barbara Sand and Topsoil mining operation on Ellwood Canyon Rd.

I.41-1

The Glen Annie Golf Course site lies on a border of the City of Goleta. It would cause the City of Goleta to shoulder all the burdens of this massive development with the revenue benefits accruing to the County of Santa Barbara. It is easy to understand why the County of Santa Barbara included this site. It is an inappropriate site for inclusion and is patently unfair to the City of Goleta.

We don't want to hear about how helpless the county is in resisting the housing mandates of the state of California. We want a more appropriate site or sites chosen to fulfil state housing mandates.

Sincerely,

Brian Bailey

805-637-1031 Ofc./Text
805-603-1031 Fax

Brian@BrianBailey.com
www.BrianBailey.com



Please consider the environment before printing this email.

Comment Letter I.41 – [Brian Bailey]

Comment Response I.41-1

The comment letter is a copy of Comment Letter I.35-1. Please refer to Comment Response I.35-1.

Alamilla, Breanna

From: PAD LRP Housing Element
To: Steele, Jessica
Subject: RE: Glen Annie Housing Development

-----Original Message-----
From: Linda Hale <lhale2311@gmail.com>
Sent: Wednesday, January 31, 2024 12:50 PM
To: Steele, Jessica <jsteele@countyofsb.org>
Subject: Glen Annie Housing Development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I strongly oppose the proposal to build high density housing at the current Glen Annie Golf Course site. I have owned my home in beautiful Goleta for 28 years, and have invested many joyful hours helping to keep this place as special as it is… my kids went to school here and have helped save our lovely Ellwood Mesa from development, as well as beach clean up days, trash pick up on the bluffs, etc. The golf course is a wonderful community resource. The existing infrastructure cannot support 500-1000 units. That means thousands more people, cars, traffic, water usage, sewage, displaced wild critters & crowded classrooms. Surely the County can find a better location, ie: San Marcos Growers property.
Linda Hale
Sent from my iPhone

I.42-1

Comment Letter I.42 – [Linda Hale]

Comment Response I.42-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to its value as a community and recreational resource and potential impacts associated with development, including impacts to roadway and intersection congestion, water supply, utilities, and public services (i.e., schools).

Please refer to Master Response 2.

Alamilla, Breanna

From: Martin Krebs <martykrebs@yahoo.com>
Sent: Wednesday, January 31, 2024 2:19 PM
To: PAD LRP Housing Element
Subject: No to Glen Annie GC development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I own a property in Crown Collection across the street from the Glen Annie Golf Course. Crown Collection properties are large high-end homes that average around 4,000+ sqft and sell in the range from $2.5M to $3M.

The idea of low-cost high-density housing across the street is aggressively NOT welcome.

We are paying huge taxes to Goleta to live in what we thought was/is a protected environment. When our properties were developed we had a golf course next door for god sake. Now you want to destroy this area that we worked so hard to get, by imposing high-density housing and huge amounts of unwelcome traffic.

The very least you must do to protect our properties is demand that any development adjacent to CC be of like-kind. This is what other cities do; so should Goleta. As a minimum, when the battle is lost, we need a couple rows of CC like-kind housing to form a buffer as an absolute minimum. I.43-1

Or better yet reject this development idea. I don't want it.

In addition all the taxation income for that new housing will go to the county unless it is annexed to Goleta.

Goleta does not need to absorb immigrants.
The US does not need to absorb immigrants.
Just STOP it!

Martin Krebs
232 King Daniel Lane

Comment Letter I.43 – [Martin Krebs]

Comment Response I.43-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie).

Please refer to Master Response 2.

Alamilla, Breanna

From: Dalina M <dalina@gmail.com>
Sent: Wednesday, January 31, 2024 4:13 PM
To: PAD LRP Housing Element
Subject: Carp project

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello,
As a lifelong resident of our community, I am really hoping you will see that this project is way too large for the area. The affects on parking and the neighborhoods- which are already overburdened with cars and people- will be very extreme.
Please listen to those who live here and recognize our voices. We do not have the space or resources for this project.
Thank you for your support.

I.44-1

All the best,
Dalina

Comment Letter I.44 – [Dalina M]

Comment Response I.44-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to potential impacts to traffic and intersection congestion. These impacts are analyzed in Section 3.14, *Transportation.*

Please also refer to Master Response 5.

Alamilla, Breanna

From: Forrest Fleming <forrestleefleming@gmail.com>
Sent: Wednesday, January 31, 2024 12:02 PM
To: PAD LRP Housing Element
Cc: Mary Fleming
Subject: Glen Annie development project

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Sirs,

I am a resident at the Crown Collection off Cathedral Oaks Dr near the Glen Annie golf course.

I understand that there is housing development proposed for this area. Can you share details on what is being proposed? What density is expected? Apts or single homes ?? Price of homes, size of lots etc? Timing of likely development? I.45-1

I am concerned about traffic if there is a large resident increase.

Thank you for your prompt response,

Forrest Fleming
240 King Daniel Lane
Goleta CA 93117

Comment Letter I.45 – [Forrest Fleming]

Comment Response I.45-1

The comment requests details regarding the Housing Element Update's sites inventory and proposed rezoning of Rezone Site No. 11 (Glen Annie). Details regarding the proposed rezoning for this site are presented in Chapter 2, *Project Description,* Appendix B of the EIR, as well as the adopted 2023-2031 Housing Element Update*.* As presented in Table 2-13 therein, the sites inventory identifies Rezone Site No. 11 (Glen Annie), which would involve rezoning of a total of 94.7 acres on Assessor's Parcel Numbers (APNs) 077-530-021, 077-530-020, and 077-530-012. Under the Potential Rezone Program, a total of 44.7 acres of the site would be rezoned as DR with a maximum density of 1.5 units per acre (DR-1.5) and the remaining 50 acres would be rezoned to DR with a minimum density of 30 units per acre and a maximum density of 40 units per acre (DR-30/40). The EIR's analysis of potential impacts associated with rezoning and potential future development of this site is based upon the sites inventory and proposed zoning designations for these parcels.

Alamilla, Breanna

From: J Powell <janouida@gmail.com>
Sent: Thursday, February 1, 2024 11:56 AM
To: PAD LRP Housing Element
Subject: Glenn Annie/Storke High Density Rental Units

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

The offramp is already a safety hazard.
The Hollister/Storke area is already LA gridlock.
Parking is already insane.
Air pollution is already unsustainable.

I.46-1

Comment Letter I.46 – [J. Powell]

Comment Response I.46-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to traffic, parking, and circulation constraints and existing air pollution.

Please refer to Master Response 2.

Alamilla, Breanna

From: Albert Ronyecz <aronyecz@msn.com>
Sent: Thursday, February 1, 2024 2:59 PM
To: PAD LRP Housing Element
Subject: Comments on DEIR Housing Unit Element Update

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To: Hannah Thomas

Please accept the following as my comments on the DEIR for the Housing Unit Update. All comments below are directly related to the designation of the parcel known as the Glen Annie Golf Course (GAGC) located north of the City of Goleta as a potential rezone site. I am more familiar with this location as I live adjacent to it.

I am opposed to designating the GAGC as a potential rezone site for the following reasons:

1. Rezoning this property for housing is the wrong designation for the wrong location. The parcel is located at the far northern edge of the Goleta city center allowing leapfrog development beyond the city limits on property currently zoned for agricultural/recreation. Good planning has historically discouraged leapfrog rezoning of agricultural land for construction.

2. The only transportation access to the property is Cathedral Oaks to the south. From experience living here, this major thoroughfare is already overburdened with traffic, especially during peak hours and when Highway 101 is closed down due to an emergency. Public transportation is minimal. Isn't the Goleta city housing plan to develop housing along the Hollister Avenue corridor to accommodate a robust public transportation system? Locating houses away from Hollister countermands the Goleta plan.

3. The property is landlocked to the north, east and west. There is no egress for GAGC other than south to Cathedral Oaks making current and future residents trapped in the case of a wild fire or other disaster requiring quick evacuation. The property to the north is fire prone open fields and national forest. With the rezoning and development bringing additional GAGC residents, Glen Annie Road and Cathedral Oaks will be gridlocked as the flame front rapidly approaches.

4. As a general comment regarding the State requirement for additional housing, where will the additional water and trash service be accommodated? We are in a perpetual drought mode and Tajiguas landfill is due to close soon. Doesn't good planning mean we should develop viable water and trash infrastructure before property rezoning and importing more housing units?

I.47-1

Thank you for the opportunity to register my comments.

Al Ronyecz
Goleta resident

Comment Letter I.47 – [Al Ronyecz]

Comment Response I.47-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to potential impacts associated with zoning inconsistencies, traffic and intersection congestion, wildfire risk, and public utility constraints.

Please refer to Master Response 2.

Alamilla, Breanna

From: Shelagh Erwin <sales@southcoastinn.net>
Sent: Friday, February 2, 2024 11:56 AM
To: PAD LRP Housing Element
Subject: NO! high density house at the Glen Annie Golf course

Importance: High

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom it may concern!

I have lived in Goleta, my whole life. I currently live on Brandon drive. They thought of 2 projects in our area is absolutely crazy!!!
There are a lot of things that I don't get! How can our neighborhood support all that goes with the developments in the works. Traffic, water? All the major road are one line each way!!! What comes to my mind is the Maui Fire, we know how that ended! Residence died trying to flee the fires!!! I could go on and on. I.48-1

PLEASE DO THE RIGHT THING. Say no way!!!! Do not let the developers buy you.

Shelagh Erwin ☺
Best Western Plus South Coast Inn
5620 Calle Real
Goleta, CA 93117
(805) 690-3011 direct line
sales@southcoastinn.net
reservations cannot be booked, motified or cancelled by email request outside normal business hours (M-F 8am to 2pm)
Call hotel directly 805-967-3200

Comment Letter I.48 – [Shelagh Erwin]

Comment Response I.48-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie) due to traffic, water supply constraints, and wildfire risk.

Please refer to Master Response 2.

Alamilla, Breanna

From: Danica Modugno <goletagirl8@gmail.com>
Sent: Friday, February 2, 2024 10:53 AM
To: PAD LRP Housing Element
Subject: High Density Housing at Glen Annie

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Good morning,

I have lived in Goleta my whole life and I am very disappointed to see all of the huge, high density housing complexes that have been built in the past 5-10 years. Please do not build the housing units at Glen Annie golf course. This area is already affected by high traffic, and our roads cannot sustain the amount of cars another huge development would add. Water is another resource that has been an issue in our town in years of drought. Additionally, the golf course is a beautiful open space and we are already losing so much open space that makes Goleta special. Plus, the housing will not be "affordable" for locals, it will only add more people from out of town who can afford the high prices in the SB area. I.49-1

Thank you for your time,

Danica

Comment Letter I.49 – [Danica Modugno]

Comment Response I.49-1

The comment expresses concern for the selection and development of Rezone Site No. 11 (Glen Annie) due to traffic and water supply constraints, loss of open space, and housing affordability concerns.

Please refer to Master Response 2.

Alamilla, Breanna

From: Norman Louie <normanlouie@hotmail.com>
Sent: Friday, February 2, 2024 1:36 PM
To: PAD LRP Housing Element
Subject: Red tail development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom it may concern
Iam against the development of apartments being built on Ballard in Carpinteria California. It will disturb the peaceful and the beautiful Mountain View from the condo that I own in the Casitas Village.
Norman Louie
5970 Birch St. #4

I.50-1

Sent from my iPhone

Comment Letter I.50 – [Norman Louie]

Comment Response I.50-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]).

Please refer to Master Response 5.

Alamilla, Breanna

From: P Ten <philipmtennant@gmail.com>
Sent: Friday, February 2, 2024 3:20 PM
To: PAD LRP Housing Element
Subject: Glenn Annie golf course development.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

SB planners,
I have written before about building houses on Glen Annie golf course, but I'm now forced to write again.
I still don't know why a perfectly located golf course is targeted by SB County planners, when there are 10,000's of acres of land lying fallow west of Goleta. Here you could build a whole new development of affordable housing, bothering virtually no one, with easy access to 101. I know nobody wants to ruin the Gaviota coast, but a half mile stretch, of over 25 miles, north of the 101 behind a well designed and landscaped frontage would hardly spoil the coast. I'm sure most Goletans would prefer that to losing yet another golf course.
There are numerous reasons for preserving Glen Annie GC:
1. It's a part of the Goleta community, offering golf at a reasonable cost. Muni is too crowded, Sandpiper too expensive, and others are out of town. Also, in the recent past Ocean Meadows went under the developer's bulldozer and Rancho San Marcos went out of business. Glen Annie GC is frequented by many retirees, like myself, who have served the community for decades, paid taxes, and now deserve to enjoy their retirement. Additionally local residents and high school teams, county residents, and out of towners/long distance visitors all benefit from and enjoy this unique golf course.
2. The golf course has wonderful wildlife. Coyotes, deers, foxes, squirrels, and numerous others mammals and rodents. Birds include roadrunners, kites/hawks, hummingbirds, blue birds, scrub jays, doves, and many, many others. Frogs, toads, salamanders, snakes, and other reptiles. Butterflies, moths, honey bees, and more insects. As well as the fauna and flora. All these would be disturbed possibly permanently. I'm sure the environmentalist will be alarmed by such an upheaval when virtually every area will be subject to destruction, new construction and re-landscaping. I.51-1
3. And, not to mention Glen Annie unrivaled location on the coast. The magnificent views across Santa Barbara channel and the mountains up and down the coast, at sunrise and sunset - a paradise that is almost impossible to beat.
4. Any re-development of such a magnitude will last numerous years and it will be us local residents who will suffer through this period with noise,

dust, pollution, traffic, inconvenience, devaluation of our properties, to name a few.
5. And talking of traffic. Today at peak times the traffic is backed up over half a mile in all directions and into the local neighborhoods and also the 101 off ramp is often backed up. Then, once the development is completed, the snarl up of all approach roads will be horrendous. I can't imagine the gridlock with parents and children becoming frustrated and making dangerous decisions when trying to get to work/school. Only a major widening of all approach roads to the high school and Glenn Annie, and probably the 101 too would alleviate this congestion. Of course you could just ignore this potential problem until after there's a serious injury or worse.
So again, why is the county considering building there, at the very edge of Goleta city, next to a high school with all approaching traffic bottle-necking at 2-3 intersections? Maybe the county planners just don't care (I don't play golf, anyway, it's not in my backyard!)

I.51-1 Cont.

You planners to should seriously (re-)consider approaching the Doty's, Braggs', and other landowners west of Goleta and/or west of Farren Road and along the coast to see if anyone would sell their non-productive acreage which likely would be cheaper. This would make for total freedom of a better laid out development that is not restricted by the confines of a small area adjacent to an existing high school and residential community.

I attended the meeting Monday night at Dos Pueblos high school. All the information was interesting but, if you didn't sense it, virtually nobody there was in favor of the development. All the "for the community" was BS, we have access to numerous trials already locally and further afield, a community swimming pool will not offer recreational swimming (i.e 33-50 meter pool), and pickleball is just a current fad. If anything, attendees were more interested in finding out what steps it would take to defeat the process and send it back to the drawing board. I can't believe Sacramento's directive is - build on a golf course. Find a less controversal, more suitable location elsewhere.

I know this email is long and wordy, but I had to get it off my chest.
Please, I hope you take this as seriously as we community members do.
Best regards,
Philip Tennant 805 259 8325

Comment Letter I.51 – [Phillip Tennant]

Comment Response I.51-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts associated with biological resources, aesthetic resources, noise, dust, and roadway and intersection congestion and safety. The comment also suggests alternative sites for development.

Please refer to Master Response 2. Further, as described in Chapter 4, *Alternatives Analysis,* CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project that would avoid or substantially reduce the significant impacts while accomplishing all or most of the project objectives. CEQA Guidelines Section 15126.6 further states that an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The EIR presents consideration of eight separate alternatives to the proposed Project, including a No Project Alternative. Of these eight alternatives, three alternatives were discarded from further analysis due to failure to meet Project objectives, and five alternatives were carried forward for full analysis and comparison to the proposed Project. Excluding the CEQA-mandated No Project Alternative, the EIR presents a meaningful analysis of four separate alternatives and need not include consideration of additional alternatives recommended by the comment. Nevertheless, these comments have been noted and will be forwarded to decision-makers for consideration.

Alamilla, Breanna

From: john_leonard@cox.net
Sent: Saturday, February 3, 2024 10:09 AM
To: PAD LRP Housing Element
Subject: Glen Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Hannah Thomas,

I have lived in El Encanto Heights for 45 years. Although there has been very little residential growth, the traffic situation has grown to an unsustainable condition. Storke and Hollister have become a destination for many outside the area. As a result, a traffic bottleneck has developed at Glen Annie and 101. Morning commute to Santa Barabara is impossible. Other times of day it's still very bad. When DPHS students are in transit to/from school the traffic backs up solid from Glen Annie/101 to Cathedral Oaks/Alameda.

Current grade for traffic engineering in the area is an "F". No matter how many traffic studies they do, there is no reasonable fix to the current traffic problem at Glen Annie road. Adding more traffic with the Glen Annie conversion will make things impossible here.

I.52-1

My children grew up playing golf at Glen Annie. I play there at least once a month. I consider it a highly important factor in the quality of life here. Losing it would be a terrible shame

I understand you have to meet new housing quotas per state mandate. Hopefully you can find a solution that doesn't cause far more harm than good to existing residents.

Please do not convert the golf course.

Thank You,
John Leonard

Comment Letter I.52 – [John Leonard]

Comment Response I.52-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value. Additionally, the commenter argues that the selection and development of this potential rezone site would exacerbate existing traffic and congestion.

Please refer to Master Response 2.

Alamilla, Breanna

From: Berni Bernstein <bernibernstein@hotmail.com>
Sent: Saturday, February 3, 2024 5:53 PM
To: Berni Bernstein; PAD LRP Housing Element
Subject: Carpinteria Red Tail Development opposition by owner of condominium at Casitas Village

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear County Officials,
Thank you for your attention to the 176 apartment units being proposed behind Casitas Village in Carpinteria. This tall development is not appropriate at all for this site.
As an observer and owner of a property on Hickory, right around the corner, I strongly oppose this project due to its terrible impacts on this lovely neighborhood. For several reasons I oppose this. First, the impacts of a three-story building are totally incompatible with the lower footprints of nearby properties.
Second, parking will be impacted with so many new drivers parking nearby, and finally mountain views will be forever blocked by massive incompatible buildings. In the event of a fire, it could become a terrible tragedy with panicked drivers competing to use Bailard to get to safety.
Thank you for sending this disaster of a project back to the drawing board to become more aligned with size, bulk, and scale of the area. Please let me know you received this message.
Sincerely,
Berni Bernstein

I.53-1

Comment Letter I.53 – [Berni Bernstein]

Comment Response I.53-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to concerns regarding aesthetic and traffic impacts. These impacts are analyzed in sections Section 3.1, *Aesthetics and Visual Resources;* and Section 3.14, *Transportation.*

Please also refer to Master Response 5.

Alamilla, Breanna

From: David and Shen Meyer <d.meyer11@verizon.net>
Sent: Saturday, February 3, 2024 4:28 PM
To: PAD LRP Housing Element
Subject: Red Tail Development in Carpinteria

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To Whom It May Concern,

I have been a home owner in the Casitas Village condo development, adjacent to the proposed Red Tail project, for over 45 years. The Red Tail proposal is an absolutely terrible fit for our neighborhood. We currently have a major parking issue with both the Via Del Mar condos and the Casitas Village condos bursting at the seams with overflow parking on Bailard Avenue on a daily basis. Red Tail would make an already bad situation even worse, if constructed. The Bailard condo area is already one of, if not the most, high density area in all of Carpinteria. To add 176 apartment units to, what already is a highly congested area, makes absolutely no sense at all!

In addition, the Red Tail project abuts to the existing condos located on Birch street with 3 story structures that destroy the mountain views. 3 story apartments located up against existing condos on land that has been farmed for generations makes no sense whatsoever. The whole development smacks of the San Fernando Valley, Oxnard, and other California areas where no thought was given to the long term impact of poorly planned sprawl. I.54-1

While I understand that the state has pressured counties to build more housing, it needs to be done with care and concern for the existing residents in county localities. This project does not do that. And it's the current residents, who are mostly low and middle income, that will suffer the consequences of this Red Tail development if it is approved.

Finally, there is clearly a need for more low income housing in our community. However, this project is clearly designed to give lip service to the low income needs while the bulk of the units will go at market value to out of town individuals thereby doing next to nothing for our low income housing needs. In an area already so densely impacted with hundreds of low income residents, it makes much more sense to infill in other areas of the city that are not so overcrowded. The Red Tail development should not be approved by the powers that be in Santa Barbara County. To do otherwise, would be a disservice to the people already crammed into the Bailard area of Carpinteria. We, the citizens of Carpinteria, and the county of Santa Barbara, can do much better than the Red Tail development. It should not be approved. I.54-2

Respectfully,
David Meyer
Shen Rajan
805 698-8217

Comment Letter I.54 – [David Meyer]

Comment Response I.54-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to existing parking constraints.

Please refer to Master Response 5.

Comment Response I.54-2

The comment asserts that the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) would only provide a limited amount of low-income units and would not substantially address low-income housing needs in the community.

This comment has been noted and forwarded to County decision makers for their consideration.

Alamilla, Breanna

From: Aracely Rodriguez <ara.rod70@gmail.com>
Sent: Saturday, February 3, 2024 4:55 PM
To: PAD LRP Housing Element
Subject: 176 Apartment units behind CASITAS VILLAGE IN CARPINTERIA

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I am voting to not build the apartments in this area . We already have extremely shortage of water and parking spaces . So Why would you allow RED TAIL DEVELOPMENT to come and add to this shortage . Also, to change the natural beauty of carpinteria? So please DO NOT ALLOWED this project to go forward. Thank you in advance for your understanding. I.55-1

Araceli Rodriguez
5926 Hickory Street apartment 1
Carpinteria CA 93013

Comment Letter I.55 – [Araceli Rodriguez]

Comment Response I.55-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to existing parking and water supply constraints and potential impacts to aesthetic resources. These impacts are analyzed in sections Section 3.14, *Transportation*, Section 3.16, *Wildfire*, Section 3.15, *Utilities and Water Supply,* and 3.1, *Aesthetics and Visual Resources*.

Please also refer to Master Response 5.

Alamilla, Breanna

From: Elizabeth Ann Arey <eaarey747@gmail.com>
Sent: Sunday, February 4, 2024 10:02 PM
To: PAD LRP Housing Element
Subject: STOP Red Tail Development in Bailard

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Messieurs and Mesdames,
What are you thinking
when you entertain the
approval of the proposed 3-story, 176-unit by Red Tail development on land designated “agro” off BAILARD Casitas Villege Condos?
1) it would rob owner’s mountain views and agro land and wreak havoc
2) endanger residents preventing inadequate access for emergency and fire vehicles and equipment
3) prevent residents from adequate egress and access to their own garages and homes over the narrow pathway/alley
4) rob owners of peaceful surroundings in a neighborhood of families and children for which they paid when they invested in their homes (they already have the 101 to contend with)
5)dramatically and negatively change the character and beauty of a small seaside neighborhood community
6) over burden the town infrastructure with critical service needs for garbage collection, school buses, emergency, police and medical services, water, electricity, parking, schools, traffic, noise, etc.
7) create parking congestion and a serious traffic hazard on Birch and Bailard and surrounding streets
8) have a serious negative impact on existing birds, wildlife, family life and the environment in the area
Why take The Bailard Farmland when there are so many empty corporate offices and buildings lining the 101 to the left of Bailard?
These buildings could be turned into housing residences without harming anyone.
And remember, once the development is built, it won’t be affordable for those the state wants to accommodate. Developers are in business to make money— not support the homeless and low-income.
Give it serious thought and REJECT this proposed “development.”
It’s in the wrong place at the wrong time.
Would you want LA in YOUR back yard? And while you’re at it, do you want what’s happened to downtown SB to happen to beautiful Carpenteria?
The answer is a resounding NO.
Respectfully submitted,

I.56-1

Elizabeth Ann Arey
Santa Barbara

Sent from my iPhone

Comment Letter I.56 – [Elizabeth Ann Aery]

Comment Response I.56-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to impacts related to aesthetic resources, traffic and emergency access, public services, utilities, and biological resources. These impacts are analyzed in sections Section 3.1, *Aesthetics and Visual Resources*, Section 3.14, *Transportation*, Section 3.16, *Wildfire*, Section 3.13, *Public Servies and Recreation*, Section 3.15, *Utilities and Water Supply*, and Section 3.4, *Biological Resources*.

Please also refer to Master Response 5.

Alamilla, Breanna

From: Lily Strong <lilybstrong@gmail.com>
Sent: Sunday, February 4, 2024 11:21 AM
To: PAD LRP Housing Element
Subject: No Vote on Red Tail Development off Bailard in Carpinteria

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I would like to express my opposition to the proposed Red Tail Development project off Bailard Ave in Carpinteria. I am a home owner in the Casitas Village right next door to the proposed development.

Currently there is almost no street parking in the complex and surrounding areas. It is already saturated and a high density development would make that worse.

Also there are already two high density developments there and I am concerned about capacity of the emergency exits in case of fire. Bailard ave would already be backed up as it is with the density it has if every one had to leave at once. I wonder if the county would be liable for loss of life due to approval of such a big complex without proper evacuation routes, especially with our history of fire. I.57-1

I think a site that was less saturated would be better for such a high density development.

I hope the city and county are throughly going to review the issue of fire in their proposal.

I vote no on those grounds.

Lily Strong, RN
Co-Founder
Earth Diaper
www.earthdiaper.org

Comment Letter I.57 – [Lily Strong]

Comment Response I.57-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to existing parking capacity constraints and concerns regarding emergency evacuation routes. These impacts are analyzed in detail in Section 3.16, *Wildfire*.

Please refer to Master Response 5.

Alamilla, Breanna

From: Dave Barakat <dave.barakat@icloud.com>
Sent: Sunday, February 4, 2024 2:38 PM
To: PAD LRP Housing Element
Cc: dave.barakat@icloud.com
Subject: NO VOTE regarding Red Tail Development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I was recently made aware of Red Tail Development's desire to constuct a 176 unit, 3 story apartment building behind the existing Casitas Village site in Carpinteria. I own a unit in Casitas Village and am EXTREMLY concerned about this potential development.

This project will negatively affect the pleasant living environment at our site due to increased traffic, noise, limited parking, congestion and blocking the great view. Please consider these concerns, as well as others, presented by my fellow owners.

I.58-1

Comment Letter I.58 – [Dave Barakat]

Comment Response I.58-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to anticipated impacts associated with site development including impacts related to noise, traffic congestion, and aesthetics. These impacts are analyzed in Section 3.11, *Noise*, Section 3.10, *Land Use and Planning*, Section 3.14, *Transportation*, and Section 3.1, *Aesthetics and Visual Resources*.

Please refer to Master Response 5.

1483 Camino Meleno
Santa Barbara, CA 93111
04 February 2024

Dear Supervisor Capps & Board of Supervisors,

I am writing to ask for your support in denying the rezoning proposal for the Glen Annie Golf Course to convert it to housing. Despite the good intent of the state to provide for housing, this is the wrong location in many regards.

I'm sure you are well aware that the property is outside of the urban boundary. When the property was allowed to convert from agricultural to recreational, it was with the express understanding that housing was not a future possibility. Already the traffic at the intersections of Glen Annie and Cathedral Oaks, as well as with the Hollister corridor, are often at or beyond capacity of the road infrastructure. Converting Glen Annie into housing would impact the traffic in that part of Goleta quite severely and for the worse.

Which, of course, belies the point that the golf course is currently an important community resource. It is also an environmental asset that provides habitat for wildlife. To take away this course would greatly impact the remaining public courses in the Goleta and Santa Barbara areas. Nearby courses that have already closed in the past few years include Ocean Meadows, Rancho San Marcos, and Hidden Oaks. I can think of only Sandpiper, Twin Lakes, and Santa Barbara Municipal as the remaining public options, with only the latter being the only course owned by a municipality.

I.59-1

The golf courses not only provide a place for the community to recreate and learn and practice golf, it adds to the health of the community and gives the areas green open spaces. Granted that a golf course is not a park, which would provide the public greater access. But nonetheless, the health and community spirit benefits are not to be denied. If Glen Annie is closed the few remaining courses would become extremely over-used and crowded, to the extent that access would be denied to many who wished to use it, and the courses would be prone to poor conditions with overuse, and likely higher rates due to the high demand.

So please consider that the impacts of changing the zoning and closing the course would be a great detriment to the community that you serve. Thank you for your service, and for your consideration.

Sincerely,
Margaret McMillan

Comment Letter I.59 – [Margaret McMillan]

Comment Response I.59-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value, potential for zoning and planning inconsistencies, and potential significant impacts to biological resources and roadway and intersection congestion.

Please refer to Master Response 2.

Alamilla, Breanna

From: Katherine Pointer <kpointer@lagunablanca.org>
Sent: Sunday, February 4, 2024 11:10 AM
To: PAD LRP Housing Element
Subject: Carpinteria Red Tail 176 Apartment Development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Good morning,
I would like to register my strong concerns and no vote to the proposed housing development off of Bailard Avenue Carpinteria. Nothing about this development in this location makes sense for our community. This is the most densely populated portion of Carpinteria already and adding additional units will increase the strain on water and parking. It may also create a dangerous situation as there are very few exit strategies for residents in an emergency. The design is also not consistent with Carpinteria - we currently have very few three-story structures and this is not the direction we want to go. To take an organic farm and convert it into this type of housing on land that was originally zoned as a transition from urban to rural land is simply irresponsible. I fully recognize that we need additional housing in Carpinteria but this is not the right proposal. I.60-1
Thank you for your time,
Katie Pointer

--
Katie Pointer
| Science Teacher | T 805.687.2461 x0228
| kpointer@lagunablanca.org

LAGUNA
BLANCA

Comment Letter I.60– [Katie Pointer]

Comment Response I.60-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to existing constraints on parking and water supply as well as potential impacts related to aesthetics and zoning inconsistencies. Impacts associated with water supply and utilities are analyzed in Section 3.15, *Utilities and Water Supply.* Impacts associated with aesthetic resources are analyzed in Section 3.1, *Aesthetics and Visual Resources*. Impacts associated with potential land use conflicts and plan and policy consistency are analyzed in Section 3.10, *Land Use and Planning.* Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.*

Please also refer to Master Response 5.

Alamilla, Breanna

From: Carla Kroman <kromancarlak@aol.com>
Sent: Monday, February 5, 2024 1:21 PM
To: PAD LRP Housing Element
Subject: Rezoning the Bailard Farm?

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Bailard Farm the morning after the February storm -

Dear Members of the Board,

As you can see how beautiful this parcel of land is from this photograph, it's hard to imagine 176 apartments covering up this beautiful organic farm and the vistas of the Santa Ynez mountains. It would be a tragedy!

This land offers organic food for our community and protective border for our urban boundary.

This proposed development is wrong for our community and will not remedy the needed housing in Carpinteria. There are many buildings and unused land parcels that could help the housing issue here.

Please help this Farm remain a useful source of agriculture and a beautiful place for everyone to enjoy. Not covered up with unattractive three story buildings, traffic congestion and loss of our majestic Santa Ynez Mountain View's.

I.61-1

Thank you,

Carla Kroman
Carpinteria resident

Sent from my iPhone

Comment Letter I.61 – [Carl Kroman]

Comment Response I.61-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to potential impacts to scenic vistas as well as the introduction of additional traffic. These issues are addressed in Section 3.1, *Aesthetics and Visual Resources* and Section 3.14, *Transportation*.

Please refer to Master Response 5.

Alamilla, Breanna

From: vivian cordova <vivian_cordova@yahoo.com>
Sent: Monday, February 5, 2024 10:50 AM
To: PAD LRP Housing Element
Subject: Red Tail Development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

My name is Vivian Cordova and I am writing to oppose the Red Tail development behind my condo at Casitas Village. Parking here is already a nightmare and I can't imagine what adding another 176 units would do. Residents currently can't find parking and park illegally in front of fire hydrants and red zones, as well as parking in alleyways. Returning with any type of cargo ends in double parking situations. Having guests is difficult. It would make our small streets and Bailard Ave very busy and difficult to drive. I.62-1

-Vivian Cordova

Comment Letter I.62 – [Vivian Cordova]

Comment Response I.62-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to existing parking and circulation constraints. Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.*

Please also refer to Master Response 5.

Alamilla, Breanna

From: Cathy Fletcher <cathyafletcher@cox.net>
Sent: Monday, February 5, 2024 2:57 PM
To: PAD LRP Housing Element
Subject: Draft Program EIR for the 2023-2031 HEU

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello,

We are writing to submit our objection to rezoning the current Ag Zone at San Marcos Farms at Hollister Ave and San Marcos Rd.

This land is an area of outstanding natural beauty with incredible viewpoints of our amazing Santa Ynez Mountain range. It is one of the few remaining Agricultural sites along Hollister Avenue that has a rich farming history for Santa Barbara/Goleta.

Any potential housing element that obscures the open space and natural beauty is a travesty to environmental justice.

The majority of the neighborhood communities surrounding this neighborhood do not have a suburban public park within walking distance that serves the children, elders, families who need a place to gather and rejuvenate.

If this land is not used to its maximum potential of continuing to provide local support in the way of agriculture, open space viewpoints, or public common good then it would be a devastating loss to our Eastern Goleta Valley.

I.63-1

Thank you,
Cathy Fletcher
Robert Fletcher
Cabe Fletcher
Bonnie Fletcher
Rose Fletcher
Eva Fletcher
4622 Mint Lane
Santa Barbara, CA 93110

Comment Letter I.63 – [Cathy Fletcher]

Comment Response I.63-1

The comment expresses opposition to rezoning of lands in Eastern Goleta Valley, particularly Rezone Site Nos. 6 (Caird 2), due to impacts associated with site development and potential policy inconsistencies relating to conversion of agricultural lands, flood hazards, airport safety hazards, biological resources, impacts to existing regional bikeways, and traffic and emergency access.

Please refer to Master Response 3.

Alamilla, Breanna

From: Carla Kroman <kromancarlak@aol.com>
Sent: Monday, February 5, 2024 1:42 PM
To: PAD LRP Housing Element
Subject: Reference attachment photo for rezone consideration for Bailard Farm

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Sent from my

I.64-1

Comment Letter I.64 – [Carla Kroman]

Comment Response I.64-1

The comment letter does not provide any direct comments related to the EIR. Nevertheless, this comment has been noted and forwarded to County decision makers for their consideration.

Alamilla, Breanna

From: Sandra Aguilar <sandraaa08@yahoo.com>
Sent: Monday, February 5, 2024 8:45 PM
To: PAD LRP Housing Element
Subject: 176 apartment units built right behind casitas village in three story high buildings? No no no. In the event of a fire we will be competing to use Bailard to get to safety. It will be a disaster, very scared 😳 I don't agree sincerely, Sandra Aguilar

I.65-1

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Sent from my iPhone

Comment Letter I.65 – [Sandra Aquilar]

Comment Response I.65-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) and expresses concern related to transportation, circulation, and emergency evacuation routes. Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.* Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.* Please also refer to Master Response 5.

Alamilla, Breanna

From: Ann Wooten <awooten6@verizon.net>
Sent: Tuesday, February 6, 2024 12:31 PM
To: PAD LRP Housing Element
Subject: Red Tail Development off Bailard

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

We are owners of a Casitas Village condo on Birch St and are VERY much opposed to the 3 story high, 176 apartments proposed to be built by Red Tail Development off Bailard..

This development is HUGE and will have a critical negative impact on the area. If there are just 2 people in each apartment, which is highly unlikely, that will be at minimum an additional **352** people with at least 176 cars. It would probably realistically amount to double or triple the number of people & cars, given the housing situation and location. This will have a huge impact on water and sewage as well.

If there is ever an emergency or evacuation, there is no way all those cars/people plus all the cars/people in Casitas Village and adjoining condos could get out safely. Current storm conditions and concerns should be reminder to you that an emergency could happen in that area!

I.66-1

Three story high buildings will have a significant negative impact over quality of life as the buildings will tower over Casitas Village blocking precious mountain views, and could negatively impact our property value. With the proposed pool and a community center right behind the alley behind Birch St, there will also be an increase in the noise level, the extent to which could be significant.

The scale of this development, number of people & cars, water & sewage, safety, views, property values, and noise are all critical issues to be considered.

As stated above, we are strongly AGAINST this huge proposed development.

Regards,
Steve & Ann Wooten

Comment Letter I.66 – [Ann Wooten]

Comment Response I.66-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to existing parking capacity constraints, traffic, emergency evacuation routes, water supply, aesthetics, and noise. These impacts are analyzed in sections Section 3.14, *Transportation*, Section 3.16, *Wildfire*, Section 3.15, *Utilities*, 3.1, *Aesthetics and Visual Resources,* and Section 3.11, *Noise,* respectively. Please also refer to Master Response 5.

Alamilla, Breanna

From: Fabiana Pecanha <fabicalifa@hotmail.com>
Sent: Tuesday, February 6, 2024 1:28 PM
To: PAD LRP Housing Element
Subject: Bailard Avenue Multifamily Housing Project

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi There,

I am a homeowner at Casitas Village and I vote NO for this project. I.67-1

Best Regards,
Fabiana Pecanha
5980 Birch Street #3
Carpinteria CA 93013

Comment Letter I.67 – [Fabiana Pecanha]

Comment Response I.67-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]).

Please refer to Master Response 5.

Alamilla, Breanna

From: Andi Modugno <amodugno88@gmail.com>
Sent: Tuesday, February 6, 2024 1:12 PM
To: PAD LRP Housing Element
Subject: Glen Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To Whom It May Concern,
Please do NOT build housing of any kind at the current location of the Glen Annie Golf Course. This is not a safe place to put this project. Our roads are not set up for a high amount of traffic, and it is already an issue in this area. During evacuation orders (which have become increasingly frequent) this will create a very unsafe condition for individuals trying to move to safety. Ignoring this issue feels negligent.

Additionally, we need the open space. The destruction of our natural spaces and mass building is adding to the issue of global warming. New home construction in the US creates over 50 million tons of embodied carbon emissions annually.

Lastly, we do not have enough water in our area. While the 2023-2024 rains have brought a good amount of water to us, we live in an area that is more typically subject to drought. It is illogical to add more housing to an area that does not have the resources to support it.

I.68-1

Thank you,
Andi Modugno

Comment Letter I.68 – [Andi Modugno]

Comment Response I.68-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to potential impacts related to traffic, emergency and evacuation routes, the need for open space, and drought.

Please refer to Master Response 2.

Alamilla, Breanna

From: Laurel Allen <carpgirl9@yahoo.com>
Sent: Tuesday, February 6, 2024 2:01 PM
To: PAD LRP Housing Element
Subject: Red Tail Development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I am writing this to voice my concern and objections to the proposed Red Tail project in Carpinteria. I have lived in the adjoining neighborhood of Casitas Village for over 30 years and have seen the area grow. We are at capacity for traffic and parking, not to mention the impact that more housing would have on the ability of emergency vehicles to access the neighborhood. There is only one road for ingress and egress.

I.69-1

Paving over the existing organic farmland would impact the local organic food economy in Carpinteria, as well as the carbon imprint required to transport produce from elsewhere. There is also a major concern of the water usage necessary to complete and sustain this project.

Please take these issues into consideration….and my heartfelt objection to this proposal.

Thank you,
Laurel Allen
5931 Birch Street #3
Carpinteria, CA 93013
Sent from my iPad

Comment Letter I.69 – [Laurel Allen]

Comment Response I.69-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) and expresses concern related to transportation and circulation, parking, and emergency access. Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.* Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.*

Please refer to Master Response 5.

Alamilla, Breanna

From: Darla Downs <downs.darla@yahoo.com>
Sent: Wednesday, February 7, 2024 10:55 AM
To: PAD LRP Housing Element
Subject: "NO" on proposed Red Tail Development next to Casitas Village:

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

The proposed development is too large for this neighborhood. The design is too high, the project is too dense, and there are not enough roads and parking spaces. Public transportation does not operate on a 24-hour basis, so workers and their employers will be negatively impacted--especially those traveling to Santa Barbara and Ventura. The same holds true for students attending Santa Barbara City College, Ventura College, or UCSB.

I.70-1

If you would not approve a development like this next to your home and park, please tone it down for those associated with Casitas Village.

Darla Downs (owner)
5986 Birch St. #3
Carpinteria, CA. 93013

Comment Letter I.70 – [Darla Downs]

Comment Response I.70-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) and expresses concern related to the density and height of the proposed development. The commenter also raises concerns related to traffic and regional commutes.

Please refer to Master Response 5.

Alamilla, Breanna

From: Johanna Derbolowsky <derbolowsky@verizon.net>
Sent: Wednesday, February 7, 2024 1:32 PM
To: PAD LRP Housing Element
Subject: voting on proposed Housing developement on Bailard

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To Whom It May Concern:

I am voting to NO on the proposed housing development on Bailard.
The 3 story proposed development adjacent to Casitas Village will have a huge negative impact on my property
It will impact parking spaces and escape routes in case of Fire, Our private Alley will have to be used as their second fire escape route, therefore causing a safety issue.The 176 Units will increase the danger and risks by simply overcrowding an already endangered area.
in addition it will block any mountain views and impact the quality of life.
I know that Red Tail developments is using the Remedy act to streamline their approval process. I chose Casitas village because of the nature preservency in the area, which is so important for survival of the planet.
Again my vote is a strong NO.

I.71-1

Johanna Derbolowsky
owner of
5911 Birch Street, Apt. 1, Carpinteria, Califoria, 93013

Comment Letter I.71 – [Johanna Derbolowsky]

Comment Response I.71-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) and expresses concern related to traffic and emergency access.

Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.* Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.* Please refer to Master Response 5.

February 7, 2024

Dear Supervisor Capps & Board of Supervisors,

I would like to express my interest in preserving the Glen Annie Golf Club site as an existing community recreation resource for the Tri County communities, including Santa Barbara, San Luis Obispo, and Ventura. For those of us in Santa Barbara, Glen Annie Golf Club is a part of our community, a treasure on many levels.

The Glen Annie Golf Club is a wonderful public resource and an important recreational use for Santa Barbara County, as well as the neighboring counties. It offers world class golf to not only the community, but the many tourists that visit Santa Barbara County. It is a regional venue for non-profit fundraisers, weddings, and other local community gatherings. I always enjoy playing golf there and as joining a private country club in town is very expensive I want to continue playing there as I cannot afford the private country club option.

Glen Annie Golf Club site is not an appropriate location for housing. Not only is the course a recreational resource, but it's an environmental beauty filled with wildlife habitats, including deer, eagles, geese, ducks, coots, egrets, rabbits, snakes, coyotes, and more. It also serves as a fire safety break above Dos Pueblos High School and the adjacent neighborhoods.

I.72-1

The traffic in the area is of concern as the Storke Road exit is the most impacted exit on the south coast. Traffic from the high school at peak hours at the corner of Glen Annie and Cathedral Oaks is already problematic and the addition of thousands of added daily trips at that intersection would cause additional traffic problems to the area. Emergency and fire evacuations would be risky for new housing and would pose danger.

The parcel site is steep and remote from other urban uses and is outside of the urban boundary. It has agricultural zoning like its neighbors that need to be preserved. Glen Annie Golf Club site is NOT compatible for dense housing.

Thank you for your consideration.

Sincerely,

Nancy Van Gelder
2215 Alameda Padre Serra
Santa Barbara, CA 93103

Comment Letter I.72 – [Nancy Van Gelder]

Comment Response I.72-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to its community and recreational value and potential impacts to biological resources, roadway and intersection congestion, emergency and evacuation routes, and zoning incompatibility.

Please refer to Master Response 2.

Alamilla, Breanna

From: Kathryn Miller <kathryn_miller@pitzer.edu>
Sent: Wednesday, February 7, 2024 2:21 PM
To: PAD LRP Housing Element
Subject: Erasing Glenn Annie golf course for massive number of homes/apts.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Council Members,

As a resident of Santa Barbara County, I would like to add some input to your choice of building 1,436 units on the Glenn Annie Golf Course in Goleta to appease state mandates for building more housing across the state.

As a reference point, 15,732 people currently live in Isla Vista (2022). An additional 10,188 people live on the UCSB campus. If there was a major earthquake (and we were told that the same magnitude earthquake that recently hit Turkey and Syria could hit California), a wind driven wildfire, or even a tsunami, the only evacuation routes are Storke Rd., Los Carneros, and maybe Ward Drive. It is important to think these events through before you start adding thousands of more people to this area and what it would look like during a natural disaster. Disasters happen, all of us in Santa Barbara know that well. As it is, I doubt most residents could get to the 101 freeway in one of these scenarios to get out. So that is a disaster. My neighbors and I discuss this issue often.

On a normal day, the Hollister/Storke/Glenn Annie roads are totally congested with long wait times at all the stop lights. It is worse than the Fairview/Calle Real interchange. Probably the worst spot in Goleta. It could get so much worse if you keep adding homes and people to this corridor. Let's be real.

I.73-1

All the new apartments and town homes recently built on Los Carneros (which in my opinion are hideous and crammed together) were supposed to accommodate many people at reasonable prices. That is what Goleta was promised. That did not happen after they were all built out, as outside investors bought them up and then rented them above market prices. That is very pathetic for a project that was meant to house local working people. They can't afford to live in them. And Goleta has no say in any of that. Let's be real. You have no control over your developments after they are built despite promises by the builders once the matter is out of your control. Be honest with the people of Goleta!

If Glenn Annie Golf Course can no longer make it financially, (or if you are trying to take it by eminent domain) the area should be turned into a park, a fire break, and a place for wildlife and humans to enjoy. All the open spaces in Goleta are much loved and used. Girsh Park is packed every weekend. There is no doubt that the best use of that acreage is at wildlife preserve, at worst, for agriculture, which is still better than over-building in an underfunded city like Goleta.

Fire protection, water supplies, trash services, sewage, policing (we never have enough officers to respond to incidents in Goleta and we are well aware of that), road maintenance, are all taxing Goleta's budget. We hear

about it every day and keep needing to raise sales taxes to cover it. Let's be real for once. Building up the Glenn Annie golf course is a terrible idea.

I 'm sure you will take into consideration all the other issues that have been brought up in response to the development of Glenn Annie golf course, but these are my very real concerns and I hope you consider them in your decision to develop the golf course.

By the way, I lived in a house that was spared when a wildfire burned many homes and came within less than a ½ mile from my house. I was grateful but understand the power of wildfires and wind in a whole new way. You need to really think about this issue before you start developing in fire-prone areas and an area that could be used as a buffer zone to all the homes in that part of Goleta. Our population in this area is dense enough. Let's be real for once. Just once, OK? The only people who will regret it is the builders, the rest of use will be glad reason prevailed.

I.73-1 Cont.

Thank you,

Kathryn Miller
874 Fortuna Lane
Isla Vista, CA
93117

Comment Letter I.73 – [Kathryn Miller]

Comment Response I.73-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie) due to concerns related to emergency evacuations, traffic congestion, housing affordability, wildfire, and public services, and traffic.

Please refer to Master Response 2.

Alamilla, Breanna

From: Monica Delgado <delgado.m.monica@gmail.com>
Sent: Wednesday, February 7, 2024 3:35 PM
To: PAD LRP Housing Element
Subject: NO to the Red Tail development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello, this letter is to show my total disagreement to the construction of Red Tail apartments. This is an area already overcrowded and this is a safety issue with a evacuation emergency exits. Please don't allow it. Thank you , sincerely Monica M. Delgado.

I.74-1

Comment Letter I.74 – [Monica M. Delgado]

Comment Response I.74-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to concerns related to traffic and emergency evacuation. Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.* Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.* Please refer to Master Response 5.

Alamilla, Breanna

From: Sam Eriz <greentrees.sae@gmail.com>
Sent: Wednesday, February 7, 2024 8:39 PM
To: PAD LRP Housing Element
Subject: Development at Glen Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

As a home owner in El Encanto Heights I must protest/object to any development of the Glen Annie Golf Course due to the well-known arguments that have been expressed many times before...

Traffic congestion at the HWY 101/Calle Real Intersection is unacceptable already; additional development/housing at Colusa and Del Norte, and the development as proposed in Kinman Project on Calle Real will result in irreparable harm to the community.

I.75-1

Respectfully,

Sam Eriz

37 Amador Ave.

Goleta, Ca 93117

805-294-3442 c/ph

Comment Letter I.75 – [Sam Eriz]

Comment Response I.75-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to concerns regarding traffic. Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.* Please refer to Master Response 5.

Alamilla, Breanna

From: Lenci <lencicorp@cox.net>
Sent: Wednesday, February 7, 2024 4:14 PM
To: PAD LRP Housing Element
Subject: no high density housing

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hannah Thomas,

I am letting you know as a long time goleta resident and home owner, I do not want to see high density housing at the Glenn annie golf course. The impact would be severe, our roads and traffic lights can barely handle the traffic we have now. I.76-1

Signed

Chris Lenci

--

LENCI
CORPORATION

Comment Letter I.76 – [Chris Lenci]

Comment Response I.76-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie) due to concerns regarding traffic.

Please refer to Master Response 2.

Alamilla, Breanna

From: Joanne <jmde24@gmail.com>
Sent: Wednesday, February 7, 2024 8:03 PM
To: PAD LRP Housing Element
Subject: Rezones?

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom this may concern:

I just hope not every bit of green space over time will be built on! This high density mandate is definitely ruining our coastal towns up and down the state, especially our charming low profile region of SB. I don't know whose jurisdiction it was to get this Housing Element in on time, but because our local government failed to do so, we now have to deal with Builder's Remedy, and it looks like there are a lot of these projects on the map! Developers don't care about the quality, traffic, or aesthetics of our town! Without proper leadership and oversight, we can kiss this paradise good-bye! So very sad!! Also, I feel all new housing should be workforce, not high-end. I.77-1

Sincerely,
Joanne D'Egidio

Comment Letter I.77 – [Joanne D'Egidio]

Comment Response I.77-1

The comment expresses general opposition to the proposed Project, particularly Program 1 of the Housing Element.

Please refer to Master Response 1.

Alamilla, Breanna

From: ardycemarie@yahoo.com
Sent: Thursday, February 8, 2024 12:23 PM
To: PAD LRP Housing Element
Subject: Potential Home Building Between Gwyne Ave and Ward Drive

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Ms. Thomas,
My name is Ardyce Peeples and I live at 877 Gwyne Ave. in SB for the last 50 yrs..
I am writing in regards to the potential project of building homes literally in our back yards of residential homes which is deemed by the County as agriculture land and a flood zone.

If you look back in the records of around 1997 an EIR was done on this same property and building on this property was denied. Not much has changed in this area in the last 50 yrs.
I will give you a short partial recap of the EIR.

#1: This property has the Atascadero Creek on the south side and the Maria Ignacio Creek on the west side. Both creeks drain the mountains and hills of SB and converge at the Patterson Creek crossing. This is why it is a flood zone and cannot be built on.

#2: This property lies beneath the flight path of the SB Airport. Airplanes fly over our roofs at very low altitudes, and they go lower as they go west. Many times the noise is unbearable.,
#3: There is only one access into and out of this property which is a major problem. If a disaster such as an earthquake occurs , residents on this property, could not get out nor could help get in.

#4: Traffic in our residential neighborhood would increase and become a major issue. With everyone entering and exiting our neighborhood on Hollister Ave. onto just a two way street, congestion will be a problem. And for those of us who already live in the neighborhood, increased traffic becomes a safety issue.

#5: There is an abundance of wildlife in this area and some may be protected. One sees coyotes, snakes, various species of hawks, owls and a large variety of birds, butterflies, hummingbirds, etc.

#6: The area from Gwyne Ave. all the way to the beach offers walkers and bikers and people who work and go to school at UCSB along the much used bike path majestic, expansive views of the sky, clouds, hills and mountains to the north. This SB beauty would all be taken away from thousands of people a year.

These are just some of the negative aspects of using this agricultural land for housing. If you would like to call me or come out and see the points I am trying to get across, please do. Multi story buildings built on agricultural land in a flood zone looking directly down in our homes and backyard and blocking our views is not what this neighborhood feels is acceptable.

I.78-1

Thank you for your attention to this letter.
Ardyce Peeples
Cell: 805-452- 4339

Sent from my iPhone

Comment Letter I.78 – [Ardyce Peeples]

Comment Response I.78-1

The comment expresses opposition to rezoning of lands in Eastern Goleta Valley, particularly Rezone Site Nos. 1-7. The commenter raises concerns regarding the floodplain, aircraft safety hazards, traffic, wildlife, and scenic views.

Please refer to Master Response 3.

Alamilla, Breanna

From: Amanda Silvey <amandasilvey1111@gmail.com>
Sent: Thursday, February 8, 2024 2:19 PM
To: PAD LRP Housing Element
Subject: Attention Hannah Thomas
Attachments: 20240204_171453.jpg; 20240204_172841.jpg; VideoCapture_20240208-135148(1).jpg; VideoCapture_20240208-135055(1).jpg

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I am writing to vehemently oppose the switch of the Agricultural land near Patterson/Hollister by the bike path to residential land. There are many reasons why I think it is unsafe, and why it is a conflict. The main issue is under CARD 2 (620 S Patterson Ave). There is a smaller plot of land attached to CARD2 that has only one access point from Rhoads Ave and is a flood zone. This area is on the east side of Maria Ignacia Creek and just flooded two days ago.

1. First, the land is used as an organic sustainable local farm. We talk about carbon footprint and talk about being green and "sustainability" while then creating actions that go against that narrative. We need more local farms supporting the local community. Grocery prices are skyrocketing and many of those increases are due to the cost of transportation. This farm brings food to locals and keeps a small business going with several employees.

2. Second, and most importantly is the fact that it is a flood zone. The recent rain this week had BOTH creeks full to the absolute top. If we had one more day of heavy rain it would have flooded the entire area. How can you propose to build in a flood zone?! That is negligent and a huge safety concern. Flood insurance is already extremely pricey when near a flood zone, I can't imagine trying to get loans or insurance on an actual flood site. It is a huge hydrology impact and concern. I.79-1

3. It is in a flight path and if a plane ever couldn't make the runway, it would use that area for emergency landing. That would be catastrophic if homes and people were impacted by an emergency landing.

4. Fourth, there are two creeks that are protected, and you would be directly impacting the creek flow and the wildlife. These creeks are home to various birds such as the Peregrine Falcon, Red tailed hawk, owls, and even California's protected crane. The variation of birds living there brings the Audubon Society to watch them in their natural habitat. We continuously steal land from the animals and this would be one more tragic violation of a natural habitat.

5. Fifth, the bike path is a precious part of this area and our community. Disrupting the bike path would impact so many people on a daily basis from enjoying their rides and commuting to UCSB and work.

6. Last, in an emergency we would all be at risk of death. We already have too much traffic at Patterson and Hollister. The addition of several hundred homes and double the cars would be a disaster like Lahaina Maui waiting to happen. I just moved back from Lahaina and I watched my entire town burn and people die due to evacuation traffic and limited options of escape. This would be inevitable if we convert this agricultural land to residential and a massive fire breaks out.

The owner of this land has tried to sell the land and develop it in the past. An EIR report done in the late 90's found that this land was not eligible for any housing due to the issues I stated above. I can't imagine why this is a suggestion once again after it was already found to be an unsafe natural habitat flood zone, and coastal zone. There is so much land north of us that could be utilized. There is also land in Monetecito, and other areas that could also safely add housing without messing with creeks. Please do not approve this land for any housing and certainly not the small triangle included in CARD2 that floods, is a farm, and homes birds in between Atascadero Creek and Maria Ignacia Creek along the bike path. I understand we are in need of housing, but this particular area is not a safe build site and would cause much disruption to wildlife.

I.79-1 Cont.

Thank you,
Amanda Silvey
805 837 5797

Comment Letter I.79 – [Amanda Silvey]

Comment Response I.79-1

The comment expresses opposition to rezoning of lands in Eastern Goleta Valley, particularly Rezone Site No. 6 (Caird 2). The comment notes that this potential rezone site is an organic sustainable local farm and raises concerns regarding flood hazards, aircraft safety hazards, impacts to water quality and biological resources, disruption of the existing bike path, and emergency evacuation.

Please refer to Master Response 3.

Betty L. Jeppesen
Law Offices of Betty L. Jeppesen
21 East Canon Perdido Street, Suite 207
Santa Barbara, CA 93101
Jeppesenlaw@gmail.com
(805) 450-1789

February 8, 2024

Housingelement@countyofsb.org

BY E-MAIL

RE: **NO** Vote on the Proposed Red Tail Development
By Bailard Ave., Carpinteria, CA 93013

Dear Representatives of the Housing Element of Santa Barbara County,

I hereby vote "NO" on the proposed Red Tail development by Bailard Avenue in Carpinteria.

If you allow the proposed Red Tail Development at Bailard to move forward, you will be eliminating several hundred affordable housing units already existing.

I own a condominium at Casitas Village which you can see depicted right next to the proposed development in my attachment.

PROBLEMS:

1. **PARKING**

Casitas Village truly is that, it is a small village consisting of 280 units that are the most affordable units in Santa Barbara County to either own or rent. Each unit permits the occupancy of 5 people. That is 1,400 people. Most have at least one car. That is 1,400 cars to park. Each unit has 2 parking spaces. That leaves 700 cars to compete for the very limited public street parking on Via Real and Bailard Avenues. If you add 176 units as in the proposed development by Red Tail, you will add at least that many cars to compete for those spaces. Residents are already circling around waiting for someone to pull out of a space to park. This does not even include the cars from the larger condominium development on the other side of Bailard Avenue. Many families start living at Casitas Village and then move across the street when their families increase in size and they need more bedrooms. So, you would be eliminating these two truly affordable complexes from the work force. If you take a good look at the proposed development, there are very few "affordable units" and the rest are at market value which is not affordable to most of the flower growers, gardeners, blue collar workers and other middle class families that already live by Bailard Avenue now.

I.80-1

2. **FIRE/EMERGENCY EXIT**

Red Tail Development does not have the required two emergency exits from their proposed development as required. They first approached the City of Carpinteria to try to obtain a second exit onto Bailard

Avenue but the City of Carpinteria wanted nothing to do with them and turned them down. Now, they are trying to convince you to do what another municipality refused to do.

You will see on the attached drawing that the developers have a proposed, second exit toward the Casitas Village condo complex. They have no right to use that privately owned alley which belongs to Casitas Village. Moreover, that alleyway for which Casitas Village pays taxes and which Casitas Village maintains, serves as the driveway and emergency exit for **OUR** owners/residents in the event of a fire or flood or other emergency. Red Tail pays no attention to that. They have simply drawn it in as though it was a public street and does not depict in its drawing the proximity to and the ownership by Casitas Village of this alley that their so cavalierly have commandeered. Casitas Village has been drawn in on the attachment so that you can see the true picture.

I.80-1 Cont.

3. UNCONSTITUTIONAL TAKING OF PRIVATE PROPERTY NOT FOR PUBLIC USE

If the County of Santa Barbara allows this trespass onto private property, then the County would be guilty of an unconstitutional "Taking" under the 14th Amendment to the United States Constitution. That constitutional amendment does not allow a taking of private property without just compensation but not only that it has a two-prong test: 1) Is it a "taking" for public use? If it is NOT a taking for PUBLIC use, you never get to the second prong of 2) is there just compensation. The inquiry stops there. It is unconstitutional and no amount of money can be just compensation. In this instance, a private development company from another state with developments all over the country is trying to get you to take private property from an HOA which owns private property and to give it to an identifiable class of people, Red Tail, and not the public. As such, the inquiry stops there and it is an unconstitutional taking. I would be happy to give you case citations to the lawsuits that have already so held.

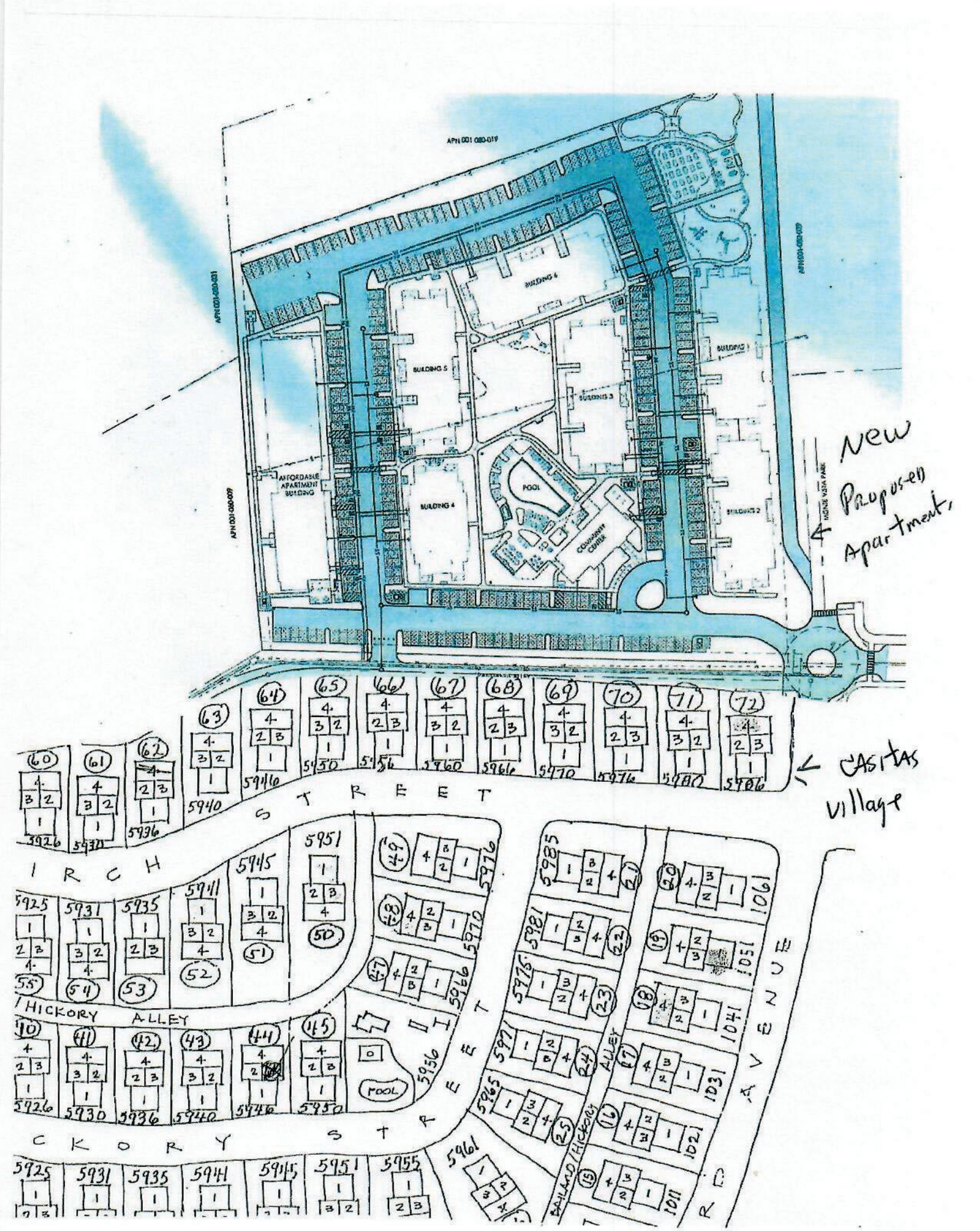
I.80-2

Please feel free to reach out to me should you have any questions and please inform me of any future public meetings and/or hearings concerning this proposed development.

Yours very truly,

Betty L. Jeppesen

Attachment: Drawing


New Proposed Apartment
CASITAS Village
APN 001-080-019
APN 001-080-031
APN 001-080-007
BUILDING 6
BUILDING 5
BUILDING 3
BUILDING 1
BUILDING 2
BUILDING 4
AFFORDABLE APARTMENT BUILDING
POOL
COMMUNITY CENTER
MONTE VISTA PARK
STREET
IRCH
HICKORY ALLEY
CKORY
STREET
AVENUE
BALLARD/HICKORY ALLEY
POOL

Comment Letter I.80 – [Betty L. Jeppesen]

Comment Response I.80-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) and expresses concern related to parking and emergency access. Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.* Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.*

Please refer to Master Response 5.

Alamilla, Breanna

From: Henry Sander <sander2116@yahoo.com>
Sent: Thursday, February 8, 2024 2:08 PM
To: PAD LRP Housing Element; hartmann@countyofsb.org; janelle@vote4osborne.com; Frank T. Troise (SoHo); joanhartmann2020@gmail.com
Subject: Housing Element /site 11 glen annie rezone

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Attn:Hanna please pass on to decision makers

I own an agricultural 40 acre zoned parcel near Glen Annie golf course.I apologize for late comment but I have never been notified of any new development near glen annie golf course despite being close to it and impacted by it.

I object to the steps that lead to potential rezoning of glen annie golf course to any dense housing zoning despite the fact that I ,and all my AG zoned neighbors would follow suit by asking for the same kind of rezone.This would result in a windfall for all of us but my desire for the quality of life here exceeds the desire for profits.My objection is for the following reasons.

1.Infrastructure

A.Traffic/Road conditions despite being better than some areas will undoubtedly be adversely affected.

1.Glen Annie exit is already over a quarter mile long and often is backed up to the highway with new residences added very recently along with big box shoppers at camino real market place and market place village,located near the exit.This causes the right lane of 101 to stop and this spills over to the left lane causing accidents as well as a slow down to 101 our only highway North.

2.Cathedral Oaks road is 1 lane road going thru the area and is often heavily impacted with Dos Pueblos High School traffic.Current proposal has 3 or 4 entrances coming off Cathedral Oaks.For Safety this will require 1 to 4 more stop lights on this road .You will now have to project 3 to 6 stop lights between Glen Annie road and Brandon road where you have 1 grammar school and with these new residences surely 2 grammar schools in the neighbor hood.This is on the only road in Goleta where you can drive for miles without stoplight traffic and enjoy the scenery to the North.Please don't ruin this alternative to highway 101 which currently only has 2 stoplights from Fairview all the way to Winchester Canyon.

3.The Nothwest end of Cathedral Oaks is now closed forcing all traffic down Winchester Canyon Road Therefore using Winchester Canyon Road as a possible solution to Glen Annie exit problems is very much in question.We can't just expect the City of Goleta to solve Santa Barbara County problems with housing..

I.81-1

B.Water.

My water bill from Goleta water district has increased from 200 to 300 a month in 2010 to 600 to 800 a month currently to supply mainly the residence and a < 1 acre small orchard.Costs to go to an AG meter are 60k to 100k.Thus I can't plant orchards or trees on my land without a commercial activity.How can you say you are willing and able to add thousands of residences when I pay 13.53/ to plant fruit bearing trees on my existing AG land.You can't give thousands of HCF to this project when your stopping existing residences from planting trees at a reasonable cost.I let many trees die in past drought due to cost and do we all think we will not have another one.Potential farmers and tree nerds are priced out now.

C. Wildlife.

Best part of western Goleta is the wildlife on the North side of Cathedral Oaks.It is totally different on the south residential side.I regularly see Roadrunners/Bobcats /Coyotes/King snakes/Frogs/Deer/Rabbits/Hawks/Kestrels/Turkey Vultures/Song birds/Crows/Honey bees/Canadian Geese/Ducks/Egrets/Heron/Swans on my property and you see paths and flight patterns directly from Glen Annie Golf course because of the water source.Do you really want to ruin the outstanding ecosystem that exists right in your back yard.

D.Recreational activities.

One of my fondest memories of playing golf at Glen Annie is seeing 5 high school girls and guys running across the 5th fairway to the clubhouse to play golf.I at first said you can't do that but then the parent in me said what a great opportunity that is for them .I wish I had the same experience as a high schooler looking for a fun form of good exercise to do after school.SB Municiple can not handle the demand of all 3 high schools as well as a younger children wanting to try golf out.Ocean Meadows is gone so where do kids go?
Not to mention the many old guys walking this affordable public course.This fun activity keeps us healthy an vibrant members of society.I for one would play less than half as many rounds if this course didn't exist.County/Coastal Commission stopped a proposed course 3 miles north to curb development.How is this different.Even if you don't play golf your neighbor probably does..

I.81-1 Cont.

In conclusion,Please don't open this can of worms because it is an easy solution to a difficult problem. This county has many acres of uninformed Ag owners where smaller less impacting developments can happen.The simple answer often are not the best answer.Do all Ag owners know you would entertain residential rezones to please the State.I sure didn't.Have you really tried your hardest to find potential housing sites that would be more welcome in this county.Let's keep Goleta the goodland.

Concerned County Resident in Goleta

Virus-free.www.avast.com

Comment Letter I.81 – [Henry Sander]

Comment Response I.81-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie) due to concerns regarding traffic, water supply, biological resources, and recreational resources.

Please refer to Master Response 2.

Alamilla, Breanna

From: james@moonengineering.com
Sent: Thursday, February 8, 2024 1:03 PM
To: PAD LRP Housing Element; Alamilla, Breanna
Subject: Red Tail project, Carpinteria

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Just wanted to weigh in on my displeasure with this project. Having lived in the neighborhood for 13 years I have seen how busy and intensely crowded it is. This is the most dense housing area in Carpinteria and trying to shoehorn more people, cars and traffic here is just wrong. While more affordable may be necessary this is not the place for it. Unfortunately our county supervisor has not offered any leadership in this situation as well. Because this is just on other side of the city it really is problematic. The only way to constructively deal with this situation is having a conversation with the city. Also the street is overly crowded as it is. In summary there needs to be better planning done in a cohesive manner if south county SB is to remain a desirable location to live in the future, thanks for listening I.82-1

James Camp

805-455-5094

Comment Letter I.82 – [James Camp]

Comment Response I.82-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]).

Please refer to Master Response 5.

Alamilla, Breanna

From: Karen Yonally <kyonally@gmail.com>
Sent: Thursday, February 8, 2024 2:05 PM
To: element@countyofsb.org; PAD LRP Housing Element
Subject: Housing at Glen Annie Golf Course & Environmental Impact Report

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Hannah Thomas, Project Planner,

When I was driving by Dos Pueblos High School last Tuesday around 9:00 a.m., I was reminded to write to you about the horrible traffic already facing the intersection at Glen Annie and Cathedral Oaks Roads and to urge you to please reconsider your plan of putting in high density housing at this location.

I understand the need for more housing in Santa Barbara, but It's hard to believe that, of all the possibilities, this is the best location. Have you seen the dangerous backup on northbound 101 at the Glen Annie Exit everyday from travelers to Costco, Camino Real & Target? Especially, when thinking about an emergency evacuation due to fire, etc., this area will become a complete gridlock. I.83-1

Additionally, Glen Annie Golf Course is one of the only affordable, public golf courses available to our Community members who can not afford to join a country club. It has also been a wonderful resource for nonprofits to hold events and tournaments.

Simply put, I oppose and urge the county to stop or reduce this project.

Sincerely,
Karen Yonally
590 Ellwood Ridge Road, Goleta

Comment Letter I.83 – [Karen Yonally]

Comment Response I.83-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie) due to concerns regarding traffic, safety, and recreational resources.

Please refer to Master Response 2.

Alamilla, Breanna

From: Lina Garcia <lina.garcia@yahoo.com>
Sent: Thursday, February 8, 2024 2:37 PM
To: PAD LRP Housing Element
Subject: WE STRONGLY OPPOSE Red Tail Project on Bailard
Attachments: OPINION ABOUT RED TAIL PROJECT- 02-2024.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To All Concerned,

Red Tail wants to build 176 apartments at the end of Bailard Ave.
I am a resident of Casitas Village,

WE VERY STRONGLY OPPOSE THIS PROJECT.

This project would have a tremendously negative impact on our community and environment. Given the importance of this discussion I ask you to take two minutes of your time to carefully read the document below. I tried to make it as much to the point as possible. Many other things could be added and commented upon, but these three points merit your full attention. Thank you.

Note: I also included the document as an attachment to facilitate future reference/distribution.

Lina Garcia

PARKING AND TRAFFIC

I.84-1

Just a few years ago, responding to the parking crisis in this area, Bailard Avenue was reconfigured to hold more parking spaces. We have now **100 (ONE HUNDRED)** parking spaces in the **ONE BLOCK** between Via Real and Birch St, plus **20 additional parking spaces** by the park at the end of Bailard. This block became, de facto, a parking lot, with only one lane in each direction. And still, finding parking at nights and weekends is a problem.

Casitas Village community has 280 units and 3 cars per unit, on average, i.e. about **750 cars**. Across Bailard Ave another dense community has similar problems.

Now Red Tail is proposing to build 176 apartments using this same stretch of Bailard Ave to access in/out. And, although some of them will be 3-bedroom apartments (vs. 2-bedroom, max 5 occupancy of Casitas Village's condos), let's assume just the same average number of cars per unit: three. **That will be over 500 additional cars**. And

not all of them will be housed by the project, leaving the overflow to compete for the already insufficient street parking spaces.

This will make the daily live of both communities a continuous struggle and a source of friction, for just the parking. But there is of course the problem of traffic bottleneck in Bailard Ave. to access the freeway, including the fact that the cars parked in the street will be backing up to the traffic at the same time in that one exit lane.

A much worse problem will be if there is an emergency evacuation and everybody needs to leave at the same time in a hurry. Difficult to imagine how the firefighters could possibly reach the area in this scenario. *Who of you who are thinking of approving this project will take responsibility for the fatalities?*

Add to all these practical problems the simple fact of the sudden increase in air and noise pollution that will be affecting both populations due to the density of cars in such a small area. The "children's" playground we have now will be just a sad joke, and an unsafe place to access and to be in.

I.84-1 Cont.

DESTROYING RESILIENCE

We all remember the flames during the Thomas fire quickly getting too close. At that time, the land where Red Tail aspires to build the 176 apartments was (and still is) a plain piece of farming land. Without much to feed the fire it could have acted as a buffer, a barrier, to stop or delay the advance of the fire. Instead, with the Red Tail project we will have this dense and highly flammable buildings feeding the next fire and helping it quickly spread toward us.

Similarly, atmospheric rivers and unprecedented storms start to become familiar events. Today, as I am looking at the soaked fields of the farm holding the water, I can't help but thinking how the excess water would instead run over the concrete and down to Casitas Village if the Red Tail project becomes a reality.

I honestly expect that if this project is not stopped our home insurance costs will go up significantly as the risks would skyrocket. The hellish environment that Red Tail intends to build will only exacerbate the potential damages of future climate disasters, each year more likely to happen.

CARPINTERIA THE BEAUTIFUL

We chose our community leaders for their willingness to listen to the community and act with energy and honesty to defend our future. We know for a fact that the future will bring more and more violent fires and storms. Sea levels will rise and communities will have to grow away from the coast.

I.84-2

The future will be for the children growing now in the environment that we have the responsibility to protect, and I really cannot think of a worst location in Carpinteria to build 176 apartments: This would be very bad for the future residents of those apartments and tremendously unfair for the current residents of the adjacent communities.

Most of us in Casitas Village are low-income families. For the owners who live here these condos are their main source of wealth. In my case I cannot afford to rent anywhere near, and I realize that my property will be devalued if this project goes forward. The people in Casitas Village living on Birch St across the area of the project will suffer the most as they not only lose the value of the view that the 3-story buildings will cover, but will have to endure up-close the noise and exhaust of 500 cars that will be moving in an out across their houses and also probably obstructing their alley in order to avoid the slow traffic on Bailard.

I.84-2 Cont.

The fact that we are not rich and famous people doesn't mean that an out-of-town money grabber developer should be allowed to plan and build to the expense of our safety, livelihood and quality of life. We are part of the Carpinteria community, and the entire community will be negatively affected directly or indirectly -- maybe even because this project, if approved, could become a precedent for other similarly ill-conceived and environmentally damaging projects. We, the community and the leaders, shouldn't be short sighted. If this project goes ahead there will be no turning back: the damage will be done and we will have to live with the results. But if that happens, when the time comes again to elect our representatives the community will not forget who greenlit this project in the first place and washed their hands.

Comment Letter I.84 – [Lina Garcia]

Comment Response I.84-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) and expresses concern related to parking, traffic, emergency access, and quality of life issues. Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.* Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.* Quality of life issues are discussed in Section 3.10, *Land Use and Planning*.

Please refer to Master Response 5.

Alamilla, Breanna

From: Lynne Halterlein <lehalterlein@hotmail.com>
Sent: Thursday, February 8, 2024 2:23 PM
To: PAD LRP Housing Element
Subject: Rezoning Caird 2

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.



I.85-1

Maria Ignacia Creek



Atcadero Creek

Dear SB County Housing…

Caird 2 (15.85 acres) is located at 620 S Patterson but 6 of those acres are on the east side of Maria Ignacia Creek & the bike path and accessible only through the housing tract to the east. Rhoads Ave is the only road into those 6 acres. It is not suitable for housing because of the hydrology impact…flooding hazard. Please note the two creeks on two sides of the 6 acres during our recent rain storm! Evacuation routes are limited & home buyers (low income) would have to buy flood insurance to access financing. Presently the 6 acres are growing vegetables for our community. That's a good use of this small piece of Caird 2 on the east side of the creek.

Sincerely,

Lynne Halterlein
Lehalterlein@hotmail.com

I.85-1 Cont.

Comment Letter I.85 – [Lynne Halterlein]

Comment Response I.85-1

The comment expresses opposition to rezoning of lands in Eastern Goleta Valley, particularly Rezone Site No. 6 (Caird 2), due to concerns regarding flood hazards from surrounding creeks, emergency access and evacuation, and loss of agricultural resources.

Please refer to Master Response 3.

Alamilla, Breanna

From: Ruth Meier <meier454@hotmail.com>
Sent: Thursday, February 8, 2024 11:50 AM
To: PAD LRP Housing Element
Subject: 176 New Proposed Apartment Units behind Casitas Village - Red Tail Development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

We are owners of a townhome in Casitas Village and are vey much against this new proposed development right behind Casitas Village.

Please count our two "NO VOTES" against these Apartment Units.

I.86-1

Thank you,

Heinz and Ruth Meier,
Owners of 5931 Hickory St. #3
Carpinteria, CA 93013

Comment Letter I.86 – [Heinz and Ruth Meier]

Comment Response I.86-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]).

Please refer to Master Response 5.

Alamilla, Breanna

From: Sally Lyons <selyons64@gmail.com>
Sent: Thursday, February 8, 2024 10:06 AM
To: PAD LRP Housing Element
Subject: Proposed Bailard Farm Project

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To: The Board of Supervisors

As a Casitas Village condominium owner since 1979, I am AGAINST the proposed rezoning and development of a 176-unit property being built on the Bailard Farm property adjacent to my condo.

My reasoning is as follows:

The proposed development would block my mountain views. Coming out of my home each morning, I would be looking directly toward a 3-story building and covered/open parking spaces. I currently have a gorgeous view of the mountains and open space with farmland.

I.87-1

The alley behind my condo belongs to Casitas Village, and with this proposed development is to be used as a secondary emergency exit. This alley allows Casitas Village homeowners and renters entry and exit to/from their properties from their garages. It is also used for delivery vehicles, garbage/recycling trucks and people/children walking to Monte Vista Park.

I envision tenants of the proposed development will access my alley regardless of emergency only access.With more traffic, this alley will not be workable for Casitas Village owners/tenants in safely exiting/entering their garages.

The proposed development would heavily impact traffic not only on my alley, but also upon exiting onto Bailard; crossing Via Real and entering the

north-or-south-bound freeway; or crossing over the overpass and turning onto Carpinteria Avenue.

The noise level with more housing and people would be incrementally increased. This is a very quiet complex of young children and their families and older retired people who enjoy the beauty and quiet of their neighborhood environment.

Parking is limited on Bailard and Via Real Avenues and on streets within Casitas Village. I envision parking would also be accessed by people/guests of the proposed development.

I.87-1 Cont.

I AM AGAINST THE REZONING AND DEVELOPMENT OF A 176-UNIT PROPERTY BEING BUILT ON THE BAILARD FARM PROPERTY.

Sara Lyons, Resident of Carpinteria

Comment Letter I.87 – [Sara Lyons]

Comment Response I.87-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to concerns regarding impacts to private views, emergency access, traffic, noise, and parking. Impacts associated with aesthetics and visual resources are analyzed in Section 3.1, *Aesthetics and Visual Resources*. Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation.* Impacts associated with wildfire hazards and emergency evacuation are analyzed in Section 3.16, *Wildfire.* Impacts associated with construction and operational noise are analyzed in Section 3.11, *Noise.*

Please refer to Master Response 5.

Alamilla, Breanna

From: Bill Cushman <wcushman@cox.net>
Sent: Thursday, February 8, 2024 11:20 PM
To: PAD LRP Housing Element
Cc: Tom Conklin; MICHAEL KLINGER; jlmwest@yahoo.com; John A Davis; 'Craig Gensler'; Gary Gensler; john leonard; Bud Sander; Jeff Martin
Subject: Comments on the 2023-2031 Housing Element Update Draft Program EIR

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To: Hannah Thomas
Project Planner
County of Santa Barbara
Long Range Planning and Development Division

From: Bill Cushman
1533 Manitou Rd
Santa Barbara, CA 93105

February 8, 2024 11:19 PM

Dear Ms. Thomas,

I am writing to add my comments to the 2023-2031 Housing Element Update Draft Program EIR. Let me first express my amazement at the staggering amount of detail and complexity in the EIR document. It is well done and very accessible. I will limit my comments to the Rezone Site No. 11 (Glen Annie, hence referred to as RS11), in terms of "Significant and Unavoidable Impacts" (henceforth SUI) of the proposed 2023-2031 Housing Element Update . The comments are somewhat prioritized as to my own sense of importance.

1. Transportation

   a. Impact T1. The regional transportation plan in the Dos Pueblos High School area, Cathedral Oaks corridor (east and west), Glen Anie/101 interchange, and Hollister/Glen Annie interchange is already maximized at peak ingress and egress hours. There is no mitigation plan listed that can attenuate significant and unavoidable impacts (SUI).
   b. Impact T2. Total VMT in the local area will increase to a level that cannot be mitigated with funding and mitigation fees.
   c. Impact T3. The transportation safety environment in the general area of RS11 is already at an unacceptable level of losses, from numerous minor accidents to loss of life. Any increase in daily vehicle traffic will almost certainly make the situation untenable.
   d. Collateral Impacts. Any attempts at mitigation will have collateral SUI in a much larger area which also must be accounted for (e.g. widening Cathedral oaks and Glen Annie corridors, and the aforementioned interchanges). The costs for these mitigation measures will be primarily funded by the county and its taxpayers.

I.88-1

2. Public Services and Recreation; Aesthetics and Visual Resources

   Glen Annie Golf Course serves many people in the county and further afield in their quest for outdoor recreation, public social gatherings, scenic vistas, and park experiences. Although golf is for a fee to the general public it is popularly attended, with discounted programs for men's and ladies' clubs and high school and junior golf

I.88-2

programs. Additionally, many visitors come purely for the views and enjoyment of the natural surroundings. Closing this venue will add an increased burden to the two remaining public golf courses (only Santa Barbara Municipal and Sandpiper on the South Coast) and parks in the county.

3. Agricultural Resources

RS11 would intrude on the agricultural nature of the property and extend the urban boundary into the agricultural zone which surrounds the property. This could incite future urbanization of the agricultural zones.

4. Biological Resources; Noise; Air Quality

RS11 would exclude a large population of wildlife which currently reside or migrate to this property, especially at night. It's current use as a golf course is a daytime activity, and there are no human intrusions on the nightly existence of wildlife on the property. Even during the day, there is coexistence with many species of birds (e.g. herons, egrets, raptors, geese, ducks) , mammals, and reptiles. There are riparian corridors which were preserved in the initial build of the course.

I.88-2 Cont.

There are many other resource areas which all will have SUIs, regardless of which alternative option is chosen, and those are well addressed in the draft EIR. What the EIR cannot address is the driving function for this exercise, namely, the state mandate for increased housing. It seems to me and many others to be a blunt directive to solve the housing problem without recourse for the myriad of horrible effects to our quality of life here and the environment we so cherish. While fairly priced housing for low and moderate income families is an admirable and worthwhile goal, it must not be achieved by privatizing the profits for a few and commonizing the costs for the rest of us.

Sincerely, with Respect,

Bill Cushman

Comment Letter I.88 – [Bill Cushman]

Comment Response I.88-1

The comment generally notes the findings presented in Section 3.14, *Transportation* including the EIR's determination of potentially significant and unavoidable impacts related to consistency with transportation plans and policies, VMT, and traffic/roadway safety, providing agreement with these findings in relation to Rezone Site No. 11 (Glen Annie). The comment also states that any mitigation requiring roadway improvements, such as widening of local roadways and intersections, will result in collateral significant and unavoidable impacts.

As discussed in Section 3.14.4.5, *Secondary Impacts,* transportation improvements that may arise from the implementation of **MM T-1 (Site-based TDM)**, **MM T-2 (Construction Traffic and Access Management Plan)**, and **MM T-3 (Funding and Mitigation Fee Programs Update)** could have secondary impacts related to construction and roadway operations, and some of these improvements would be considered projects under CEQA and subject to environmental review of project-specific impacts, as applicable.

Comment Response I.88-2

The comment expresses concern for selection and development of Rezone Site No. 11 (Glen Annie) due to the loss of the golf course as a recreational amenity and the resulting increase in use or impact to other regional recreational facilities, potential conflicts with agricultural lands, expansion of the Urban Area, and impacts to wildlife and biological resources.

Please refer to Master Response 2.

Alamilla, Breanna

From: Craig E Gensler <uncle.craig@verizon.net>
Sent: Thursday, February 8, 2024 4:20 PM
To: PAD LRP Housing Element; Supervisor Das Williams; Laura Capps; Joan Hartmann; Supervisor Nelson; Steve Lavagnino; sbcob
Subject: The destroying of the Glen Annie Golf Course

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom it may concern (please read anyway).

Sorry, about my attitude but it sneaks out.

Here are a few notes about how/why we should not be destroying a golf course

to build housing (When there is so much other land that could be used!).

Stupid to destroy to build when there is so many places you could just build.

Hi,

Please Do your Job.

I was taught that the Government (board of supervisors and city counsel)

was supposed to do the best for IT'S people. It does not seem right or just

for the state (and U.C.S.B) get to have so much power to make our county and city

be what they (and big business) wants. Seems like a bigger battle should be going on

or what is the use of the Board or city?

Lazy planning committee.
The committee that came up with choices to rezone seemed to very simply take the

list of the land owners who want to make more money and build who have

submitted their rezoning forms and that was their list and they were done.

Using the excuse (which I've heard) that they did not have the time or resources

to do a better job.

While at one of the zoning meetings it seemed like the attitude/loyalty was

I.89-1

leaning more towards completing a list and to those on the list.

They could have pushed harder for land north of Winchester overpass and

right of the freeway (I've heard the coast is off limits (so should

golf courses be off limits))

The golf course should not have made the list.
I must admit I did not do too much looking into this issue much but even then

some errors were made public and corrected. They had on the list a shopping

center with a bunch of working businesses. This should have NEVER made it to

their list (and neither should the golf course). Once enough light was shed

onto that choice they took it off the list. This shows that the local

people don't seem to matter when making the list.

Building the golf course.
Its not the the golf course doesn't make money, it's that the rezoning would make

huge money for the owners (and the state).

It was quite a fight to get the land re-zoned to build the golf course due to the

blue frog (environment). Now the course is home to many more animals including

the blue frog. How is it that now that the builders are in the picture non of the animals

including the frog are of any consequence and don't matter.

I don't think the committee even looked or cared about this. I've been out on the

golf course and spoke to a bird watcher who came here just to see the road runner.

Apparently it's a hard bird to find and see (I've seen the road runners a bunch of times).

To list a few more animals that are on the golf course (that apparently don't matter) that

I've seen without trying:

Red tail hawks (there is a nest on the property and has had 2-3 babies each of the past 4 years),

coots, ducks, geese, seagulls, pigeons, doves, squirrels, damn gophers, minks or weasels, rabbits,

dears, wild turkeys, coyotes, skunks, raccoons, quails, egrets, turkey vultures, humming birds, blue belly lizards,

I.89-1
Cont.

alligator lizards, skinks, gophers snakes, king snakes, rattle snakes, are a few that come to mind. I've surprised myself, the list is quite long (and I'm sure I've missed a bunch). I think I'm surprised because I take them for granted that they are there. Apparently I shouldn't take them for granted (and neither should you).

I guess we should not care about any of these animals -- Let's let some one else care on their land?

I think we should care!!

Traffic

Current traffic in this area is about at it's limit and at times over the limit and backs up onto the freeway (which is scary, wait until it happens to you, you'll see what I mean).

Now fold in the 800-1000 units on the golf course land. Now we're way over the limit.

Now fold in the 1000 or more units the city is going to put in on the mountain side of the freeway between Glen Annie and Los Carneros Road. I don't know any reason or words to describe how you will overlook this (which includes the BS about - They will use public transportation)

I.89-1 Cont

Further, at one of the meetings I spoke to one of the head traffic guys and he said the traffic is not involved with the decision, other than to put a label on it. They (traffic guys) will just have to try to fix the traffic issue once the traffic becomes and issue. Further, he said this decision is not being made with those other 1000 units in mind.

So much is wrong here. Maybe Before adding massive amount of housing make the traffic fixes first, thus caring about the current residents.

Oh, one more thing about traffic, They seem to say proximity is the most important thing. They should take in to consideration that a bunch of cars sitting idling in traffic will generate more smog than a car traveling 2 miles on flat road to Winchester.

Water

Apparently water is not an issue. I spoke to a person at the water district they said there is nothing they can do, the course has a water meter. What, some how it's fine that that one meter can become 800 to 1000 and it still counts as 1. It's also not fair that the

local citizens cough up the money to improve the sewer systems for the builders (I guess the county/state don't want to eat into the builders profits?). Plus, we (the county runs out of water every 5 to 8 years, I guess it's fine that we make that every 3 to 5 years (and hope that it always fixes itself).

Several thinks wrong here too.

I keep hearing that there is nothing we can do about it. Well, I think YOU should do your jobs. Not just sit and wait to be told from higher up what to do. Speak to those higher up in the government and explain to them tearing down community valued items is NOT the best way to solve the current made up issues. We should NOT be taking away valued things that would be used by many in the community forever. I do not think another golf course will be built, if we take it away it's gone forever!

I.89-1 Cont.

I have more to say but I need to get this in by the 9th like they told me to.

Thanks (if you read it),
Craig Gensler

P.S. You may call me if you have any questions or comments or would like to hear some more issues with the closing of the golf course.

Comment Letter I.89 – [Craig Gensler]

Comment Response I.89-1

The comment expresses general opposition to the Project and selection of Rezone Site No. 11 (Glen Annie) due to concerns regarding impacts to biological resources, traffic, and water supply.

Please refer to Master Response 2.

Cindy Marcus
1187 Coast Village Rd, Ste 1-438
Santa Barbara, CA 93108
reidsinc@gmail.com
805-451-4040

February 8, 2024

To: Housingelement@Countyofsb.org
Via email

RE: **NO vote on the proposed Red Tail Development on Bailard Ave in Carpinteria**

My vote is a definite NO on the proposed Red Tail Housing Development adjacent to Bailard Avenue in Carpinteria for the following reasons.

1. **FIRE/ EMERGENCY EXIT:**
   There is currently a safety issue during an emergency because there are already a lof of units already built adjacent to Bailard Ave. (Both Casitas Village with 280 two bedroom units and Villa Del Mar with many 2 and 3 bedroom units) and there is only one way out in an emergency for already too many people. Adding more units such as the Red Tail Development will only add to the dangerous situation where there is no other way out except from Bailard Avenue. All the adjacent streets within Casitas Village end up on Bailard Avenue which connects to Calle Real where there are other units which would be trying to exit onto Calle Real. There is already a bottleneck caused in an emergency and could be very dangerous if there were more units added in this area. The RedTail Developers think that they can take part of Casitas Village (the back Birch alley where the people get to their garages and units on Birch St) to have an emergency exit from their development but that is illegal and would endanger the people who live in Casitas Village who either own or rent their condos. That alley connects to Bailard so that is not really another exit anyway. Casitas Village is the most affordable place in South Santa Barbara County to live and houses much of the workforce living in the area. It sounds like the Red Tail Development would not be rented with comparable low rents as the ones rented at Casitas Village so they would not be affordable housing to the local workforce and would be endangering the lives of the people who already live in that area if there is an emergency such as a fire or flood or any situation where people needed to evacuate quickly.

2. **Parking Problems:**
   Although the Red Tail Developers say they are putting in enough parking, the units at Casitas Village and Villa Del Mar can attest to the fact that although each condo has 2 or

I.90-1

more parking spaces per unit that are not on the street, there is not enough street parking in the area. Neither Red Tail nor Casitas Village or Villa Del Mar have control over who parks on the public streets and already the streets are full and no parking places are available when anyone tries to park in the area now. Adding more units even though they are saying they are providing parking on site will only make parking on the streets in the area impossible. Since there is no public transportation close to that area there will be more cars in the area and it is already too crowded. If there are more than 2 adults living in each unit there will most likely be more than 2 cars per unit and there will be overflow on the streets. We already have a problem with people parking in fire lanes and we have to have them towed. The Red Tail Development would only add to this dangerous situation.

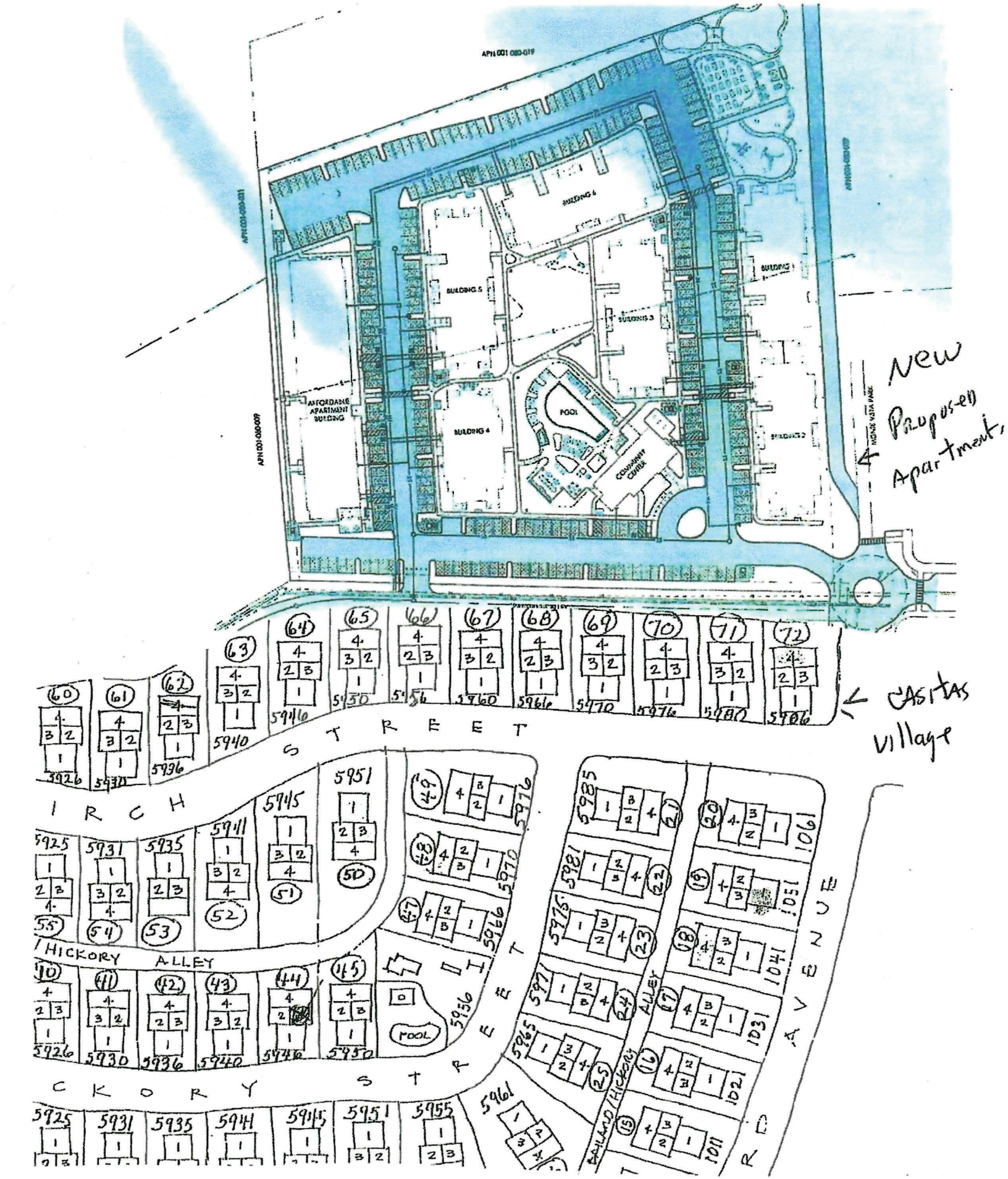
3. **UNCONSTITUTIONAL TAKING OF PRIVATE PROPERTY NOT FOR PUBLIC USE:**
Betty Jeppeson has elaborated on this issue so should you have any questions about this issue and need the case citations to the lawsuits that have already upheld this please contact Betty Jeppeson, attorney at law as she suggested. I hope the County is not going to waste any more time and money on a project that is trying to do something against the law and the United States Constitution. There are many more viable places to put affordable housing and workforce housing that are closer to services, work places, public transportation, bike paths, etc. and that would not endanger the safety of the people already living there.

4. **Conversion of Organic Farm Land to High Density Housing:**
We need our organic farms to provide healthy food to the local people. There are many empty commercial buildings which are closer to services, public transportation, stores, restaurants, bike paths, etc that could be converted to housing rather than taking a working organic farm that supplies needed food and converting it to housing that would really not be that affordable. Developers do not do things that will not make them money so this is just another project that is motivated by money rather than helping a community with workforce housing. Please take this project to another location and keep it out of this area.

I.90-1 Cont.

Cindy Marcus

Cindy Marcus


New Proposed Apartment
Casitas Village
BUILDING 4
BUILDING 5
BUILDING 3
BUILDING 2
BUILDING 1
AFFORDABLE APARTMENT BUILDING
POOL
COMMUNITY CENTER
IRCH STREET
HICKORY ALLEY
CKORY STREET
AVENUE
POOL

Comment Letter I.90 – [Cindy Marcus]

Comment Response I.90-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to concerns regarding impacts to emergency access, parking, traffic, and conversion of active agricultural uses.

Please refer to Master Response 5.

Alamilla, Breanna

From: Lori Wrenn <lorianne21@hotmail.com>
Sent: Thursday, February 8, 2024 7:36 PM
To: PAD LRP Housing Element
Subject: New proposed apartments in Carp- NO

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom it may concern,

I am writing to you as a home owner in Casitas Village expressing my concerns for the new proposed 3 story apartments.
Red Tail development is taking advantage of the builders remedy act and should not be allowed approval for their plans.
This development would negatively impact quality of life in Casitas Village. It would take away the Mountain View's we all enjoy and paid a premium for. The increase of traffic would be outrageous and parking would become a nightmare. In the events of emergencies we would be competing for exits including Bailard to get to safety.
My vote is NO for this 176 unit apartment buildings! No more traffic, no more crowding, no more noise, we want to keep our peaceful and beautiful area of Carpinteria the way it is. I.91-1

Thank you,
Lori Wrenn

Comment Letter I.91 – [Lori Wrenn]

Comment Response I.91-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to concerns regarding impacts to private views, traffic, parking, and emergency access.

Please refer to Master Response 5.

Alamilla, Breanna

From: Mette T. Eriksen <mette.torp@gmail.com>
Sent: Thursday, February 8, 2024 4:09 PM
To: PAD LRP Housing Element
Subject: Comments to housing element

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello Hannah Thomas

Sending comment for the Glen Annie project, which I am highly opposed to, placing such a condensed housing project on farmland, has so many impacts not only on vista but also on the environment in general, on top of that, just reading though the report I cannot see how the city can ignore all the impacts this will have.

This neighborhood is already dealing with too much traffic and a very bad infrastructure. Long lines of cars trying to get to and from highway 101, adding another 1000-4000 cars, is just crazy.
- Goleta district does not have the funds to maintain roads which are crumbling and full of pot holes in many places and so adding more traffic is going to make this even worse.
- I cannot understand why the city cannot build like other cities where it's understood that dense housing should be built near public transportantion, restaurants, grocery stores etc. to make it easier for people to avoid having to have a car, people living in low income housing obviously have to watch the budget so placing housing where a car is needed is not making any sense.
- Building on Glen Annie is putting people too far away from these, we don't have nice/safe bicycle paths in Goleta, so everyone would have to have cars and would be forced to go through the already congested storke rd, or alternatively drive north on Cathedral Oaks making the traffic and noise on this road a lot worse.
- The city should built dense housing closer to shops, public transportation and downtown, where local businesses would benefit from more foot traffic, and Glen Annie should be converted to farm land or even better a big park for the locals, Goleta doesn't have many trails like Santa barbara has and we don't have something like san Marcos preserve, we only have tiny parks, tuning this area into a public park would definitely greatly benefit this neighborhood.

I.92-1

Mette Eriksen
The Crown Collection.

Comment Letter I.92 – [Mette Eriksen]

Comment Response I.92-1

The comment expresses opposition to the selection and development of Rezone Site No. 11 (Glen Annie) due to concerns regarding traffic, roadway maintenance, VMT, pedestrian and bicycle connections, and alternative modes of transportation, and noise.

Please refer to Master Response 2.

Alamilla, Breanna

From: Matthew Silvey <silveymds@gmail.com>
Sent: Thursday, February 8, 2024 4:40 PM
To: PAD LRP Housing Element
Subject: Attention Hannah Thomas
Attachments: VideoCapture_20240208-135055(1).jpg; VideoCapture_20240208-135148(1).jpg; 20240204_171453.jpg; 20240204_172841.jpg

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom it may concern,

I am writing to vehemently oppose the switch of the Agricultural land near Patterson/Hollister by the bike path to residential land. There are a plethora of reasons why I think it is unsafe, and why it is a conflict. The main issue is under CARD 2 (620 S Patterson Ave). There is a smaller plot of land attached to CARD2 that has only one access point from Rhoads Ave and is a flood zone. This area is on the east side of Maria Ignacia Creek and just flooded two days ago.

1. First, the land is used as an organic sustainable local farm. We talk about carbon footprint and talk about being green and "sustainability" while then creating actions that go against that narrative. We need more local farms supporting the local community. Grocery prices are skyrocketing and many of those increases are due to the cost of transportation. This farm brings food to locals and keeps a small business going with several employees.

2. Second, it is in a potentially life threatening flood zone. The recent rain this week had BOTH creeks full to the absolute top. If we had one more day of heavy rain it would have flooded the entire area. How can you propose to build in a flood zone?! That is negligent and a huge safety concern. Flood insurance is already extremely pricey when near a flood zone, I can't imagine trying to get loans or insurance on an actual flood site. It is a huge hydrology impact and concern.

I.93-1

3. It is in a flight path and if a plane ever couldn't make the runway, it would use that area for emergency landing. That would be catastrophic if homes and people were impacted by an emergency landing.

4. Fourth, there are two creeks that are protected, and you would be directly impacting the creek flow and the wildlife. These creeks are home to various birds such as the Peregrine Falcon, Red tailed hawk, owls, and even California's protected crane. The variation of birds living there brings the Audubon Society to watch them in their natural habitat as well as nature lovers from around the region. We continuously steal land from the animals and this would be one more tragic violation of their natural habitat.

5. Fifth, the bike path is a precious part of this area and our community. Disrupting the bike path would impact so many people on a daily basis from enjoying their rides and commuting to UCSB and work.

6. Last, in an emergency we would all be at risk of death. We already have too much traffic at Patterson and Hollister. The addition of several hundred homes and double the cars would be a

disaster like Lahaina, Maui waiting to happen. I just moved back from Lahaina and I watched my entire town burn and people die due to evacuation traffic and limited options of escape. This would be inevitable if we convert this agricultural land to residential and a massive fire breaks out.

The owner of this land has tried to sell the land and develop it in the past. An EIR report done in the late 90's found that this land was not eligible for any housing due to the issues I stated above as well as others. I can't imagine why this is a suggestion once again after it was already found to be an unsafe natural habitat flood zone, and coastal zone. There is so much land north of us that could be utilized. There is also land in Montecito, and other areas that could also safely add housing without messing with creeks and natural habitat. Please do not approve this land for any housing and certainly not the small triangle included in CARD2 that floods, is a farm, and homes birds in between Atascadero Creek and Maria Ignacia Creek along the bike path. I understand we are in need of housing, but this particular area is not a safe build site and would cause much disruption to wildlife.

I.93-1 Cont.

Best,
Matthew Silvey
808-452-9057

Comment Letter I.93 – [Matthew Silvey]

Comment Response I.93-1

The comment expresses opposition to rezoning of lands in Eastern Goleta Valley, particularly Rezone Site No. 6 (Caird 2). The comment notes that this potential rezone site is an organic sustainable local farm and raises concerns regarding flood hazards, aircraft safety hazards, impacts to water quality and biological resources, disruption of the existing bike path, and emergency evacuation.

Please refer to Master Response 3.

Alamilla, Breanna

From: taylortmann@gmail.com
Sent: Friday, February 9, 2024 8:02 AM
To: PAD LRP Housing Element
Subject: New Development Behind Casitas Village

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom it may concern,
My name is Taylor Mann, my family and I live in casitas village and we love where we live. We are very concerned with the new proposed development behind our home for the following reasons.
1. We currently enjoy a beautiful view of the mountains from our front door and believe that if a 3 story structure were to be built behind us, it would impede our view. We believe that seeing nature and being in nature is critical to our mental health and this would negatively impact our lives if we could no longer see the mountains.
2. Casitas village already has a parking problem and congestion problem. We have policies in our home owners association which limits the amount of people living in our condos. This is meant to minimize the impact of congestion and parking in the area. We as a family utilize our 2 parking spots in the garage/behind the garage but most people in the area don't have that luxury and have to park on the street. If you come home anytime after 2pm on any day you will not find parking on public roads. If 176 more units were to be built in the area, I am concerned that there will not be sufficient parking for those units. Not only this, but with more people, our stop signs will most likely become more trafficked and congested which will lead to more traffic regulations or upgrades causing more time to get to where any of us need to be.
3. This leads to my last concern, I'm worried that in an emergency, with how many people that will now live in such close proximity to our 1 street exit of Ballard ave, we could all face tragedy while trying to evacuate if needs be.

I.94-1

I strongly encourage a further review and safety investigation of what the impact will be on our community if the new development were to be constructed.
Thank you,
-Taylor Mann
Sent from my iPhone

Comment Letter I.94 – [Taylor Mann]

Comment Response I.94-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to concerns regarding impacts to private views, emergency access, traffic, and parking.

Please refer to Master Response 5.

Alamilla, Breanna

From: Cassidy Kimball <cjkcassidy@gmail.com>
Sent: Friday, February 9, 2024 8:06 AM
To: PAD LRP Housing Element
Subject: NO APARTMENTS BEHIND CASITAS VILLAGE

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello,

I just moved my family to come live in carpinteria. We were so lucky to find the perfect place that meets all our needs. I will be devastated to have displaced my child to a new location only to have construction follow closely behind. This new proposed build will block our views of the mountain, invade our limited parking and cause additional traffic and safety concerns to my family. I strongly vote NO to the new build of 176 apartments off Bailard in Carpenteria. It would be a fatal error to our small, new community. Please consider this. I.95-1

Thank you,
Cassidy Harrison

Comment Letter I.95 – [Cassidy Kimball]

Comment Response I.95-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to concerns regarding impacts to private views, emergency access, traffic, and parking.

Please refer to Master Response 5.

I am writing to you to express my concerns and potential impacts of rezoning Glen Annie Golf Club. I will be attending tomorrow's workshop and would hope to have the opportunity to express my views. However if that is not possible I would like to document things I see as potential issues.

1) Adjustments to current County/City revenue share agreement due to additional liabilities and impacts on City of Goleta services due to County rezoning decisions. Additional Police, road infrastructure, traffic, and school services within the city of Goleta.

2) Geological concerns in reference to the increased weight of development on an already moving hill and potential impacts on current housing below the hill. Tee boxes continually slide and undulate on course as well as compromised irrigation pipes on a constant basis already due to current earth movement.

3) Open space of the current golf course provides a vital wildfire break for the City of Goleta neighborhoods below and Dos Pueblos High School.

4) Traffic, safety, and noise impacts of development on Cathedral Oaks, Glen Annie Road, and corresponding overpass. Adding additional traffic to some of the most high volume intersections in the City of Goleta seems ill advised. Safety concerns on one of the most used corridors by bicycle and pedestrian traffic concerns me. Noise on an already congested traffic corridor presents health and quality of life concerns for residents whose homes are near Catherdral Oaks Rd. Will the County provide sound walls for those residents to mitigate the noise impacts? I.96-1

5) Water Rights and where does the water to support this additional development come from as Glen Annie Golf Club primarily uses reclaimed water. Where does the Goleta Water District stand on this proposal? If water is not the issue, then why is Bishop Ranch not a more desirable location?

6) Impacts to nature in regards to local flora and fauna. The golf course was designed to accommodate the Red Legged Frog, how does that fit into any proposed development in this area?

7) If Kenwood Village and Heritage Ridge have both yet to even break ground how do we account for the potential impacts of these developments already approved. Wouldn't it be more prudent to wait until these areas have been infilled before considering the proposed zoning changes? I.96-2

8) What precedent would this set for other areas North of Catherdral Oaks in western Goleta. Specifically the adjacent large tracts with agricultural water rights such as the property on Northgate and Cathedral Oaks and further to the West side of the Evergreen terrace apartments?

9) My biggest concern is for overall transparency of the motivating forces behind this decision? Are the current owners of the Glen Annie Golf Club looking to take a minimally profitable business which they chose to purchase and potentially cash in on development? I.96-3

I wish to thank you for your concern for this matter. I will be posting this email on Nextdoor and social media to share my concerns with your constituents. Thank you Mr. Kasadin for your posting on Nextdoor and attention to other matters of importance to the citizens of Western Goleta.

Warmest Regards,
Ethan Woodill

Comment Letter I.96 – [Ethan Woodill]

Comment Response I.96-1

This comment expresses opposition to the selection of Rezone Site No. 11 (Glen Annie). The comment describes concerns regarding the need for adjustments to current County/City revenue sharing agreements to address the increased demand for services placed on the City of Goleta.

The proposed Project involves the implementation of a land use plan and policies that would facilitate future residential development in a manner necessary to meet the County's RHNA plus the 15 percent buffer for lower- and moderate-income households. It is not within the scope of this EIR to identify or require modifications to any existing revenue sharing agreements or MOUs for the share of cost of services and improvement, or require the establishment of new agreements. Future development would be required to pay County development impact mitigation fees, which are intended to fund fair share contributions towards regional infrastructure and facility improvements resulting from the increased demand for these services. Just as a housing project in the City of Goleta pays impact mitigation fees to the City and not the County, the same holds true for projects in the County. Additionally, housing projects would be required to construct necessary improvements to serve the project and which may serve and/or extend into adjoining jurisdictions.

Additionally, the commenter raises concerns regarding impacts from geologic hazards, wildfire hazards, traffic and traffic safety, noise, inadequate water supply, and loss of biological resources.

Please refer to Master Response 2.

Comment Response I.96-2

The comment makes reference to two pending housing development projects known as Kenwood Village and Heritage Ridge within the City of Goleta, and asks whether or not the County's decision to consider proposed rezones should wait until completion of the development of these two housing projects.

As discussed in Chapter 2, *Project Description,* the County is required to provide capacity in unincorporated communities to accommodate the County's RHNA plus a 15 percent buffer for lower- and moderate-income households using various land use planning strategies during the 8-year housing element planning period. The two pending residential development projects referenced by the commenter are located within the incorporated area of the City of Goleta and as such, do not contribute towards meeting the County's RHNA. As such, the County cannot consider these development projects when considering proposed rezone sites.

Comment Response I.96-3

The comment expresses concern for impacts to water supply associated with selection of Rezone Site No. 11 (Glen Annie) and questions the basis for the inclusion of Rezone Site No. 11 (Glen Annie).

Please refer to Master Response 2.

Ksen~Sku~Mu - Chumash
Frank Arredondo ~ Chumash MLD-Tribal Chair
Po Box 161
Santa Barbara Ca, 93102

February 9, 2024

County of Santa Barbara
project planner, Hannah Thomas
123 E. Anapamu Street, Santa Barbara, CA 93101
housingelement@countyofsb.org

Re: Draft Program EIR

To: Hanna Thomas, Project Planner

Thank you for the opportunity to comment on the above referenced project. My name is Frank Arredondo. I am a lineal descendant to the Village of Tipu' and Shalawa'. Under Spanish territory designations this makes me Obispeno & Barbareneo Chumash. I am member of the Native American Heritage Commission (NAHC) Most Likely Descendants (MLD) List for the Chumash Territory and listed on the Native American Contact list for Santa Barbara County. I went to school for a Masters degree in Archaeology where I continued my career experience working as a field supervisor for multiple CRM projects with local tribes. I have worked in CRM industry since 2006 and have been a member of the Chumash community throughout.

I.97-1

Being of Native American descendant, from the Chumash territory, and listed on the NAHC MLD contact list which under law requires me and a handful of others on the list to provide the recommend the disposition of Native American human remains when found during development projects. I take my inclusion to this small list with great responsibility and respect. To honor that responsibility, I actively participate in the prevention of disturbance to my ancestors through the thorough review of development projects. I have actively reviewed Planning and Development environmental documents for accuracy and completeness to preserve cultural resources, uphold the laws meant for the protection of Native American rights and authority.

I have worked with all the local Chumash communities at one point in my career. Today my comments are my own.

The overall section regarding Cultural resources all appear to be in accordance with the preservation of resources. I commend you on doing a through job.

I do have one section that I must comment on.

> *MM CTCR-5: Post-Discovery Tribal Consultation. For future residential and mixed-use development resulting from the proposed Project, if tribal cultural resources are identified or discovered during construction, landscaping, or other construction-related activities, the owner/applicant and/or their agents, representatives, or contractors shall immediately contact P&D. P&D shall coordinate consultation with a Native American tribal representative. The appropriate Native American tribal representative shall be identified using the most recent contact list provided by the NAHC. If mitigation actions are required through consultation with the Native American tribal representative, appropriate mitigation shall be funded by the applicant.*

A few issues of this section do not bear out in real world practice. The Practice of Tribal Consultation is codified in Govt. Code Section 65352.4. It is a legal term and is concluded when a project environmental review is concluded. That consultation cannot take place under the Law after a project is approved. So when during construction work is taking place the certification of the environmental document is already passed. So this does not apply. A easy fix is to substitute with 'meet and confer'. I.97-1 Cont.

As part of the Consultation process it is required to identify the mitigation measures to be used for the development. So that those measures will be used in the case of an unexpected discovery takes place. If those measures are not in place then the Consultation process failed in doing its job.
Once a project goes to construction, the on-site field monitor job is not only to act as a second set of eyes to identify cultural resources but is also there to assure any resources are delt with in a respectful manor. In addition, that Monitor should act as the liaison between the Consulting tribe, local Government officials and developers and contractors in order to assist in carrying out the monitoring work. Making sure the previously approved mitigation measures are implemented.

Further expansion of the activities during construction should be explained so there is no confusion or inadvertent reference to a legal process already established. I am available to provide specific information in this subject.

I thank you in advance for your time.

Best wishes, Frank Arredondo
Ksen~Sku~Mu
Chumash MLD
Po Box 161
Santa Barbara, Ca 93102
Email Ksen_Sku_Mu@yahoo.com

Comment Letter I.97 – [Frank Arredondo]

Comment Response I.97-1

The comment expresses concern regarding the language of **MM CTCR-5 (Post-Discovery Tribal Consultation)** its relation to the definitions and requirements under Government Code Section 65352.4.

MM CTCR-5 presented in the Draft EIR has been removed due to overlapping requirements included as part of **MM CTCR-3 (Stop Work at Encounter)**, particularly the requirements for coordination with P&D immediately following the incidental discovery of archaeological, historic, or tribal cultural resources, and evaluation of significance of the resource(s) by a Native American representative in compliance with the provisions of state law and the County's adopted guidance. The elimination of **MM CTCR-5** does not change the findings or conclusions presented in the EIR. Where **MM CTCR-5** was identified to reduce impacts, appropriate discussions throughout the EIR have been revised to instead reference or identify **MM CTCR-3** as required to mitigate impacts in the event of incidental discovery of tribal cultural resources.

Mullen & Henzell L.L.P.
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February 9, 2024

VIA EMAIL AND MAIL

Hannah Thomas, Project Planner
County of Santa Barbara
123 E. Anapamu Street
Santa Barbara, CA 93101
housingelement@countyofsb.org

Re: Comments on the County of Santa Barbara 2023-2031 Housing Element Draft Program Environmental Impact Report

Dear Ms. Thomas:

We appreciate the opportunity to submit the following comments on the Draft Program Environmental Impact Report (SCH No. 2022070490) ("PEIR"), which analyzes the potential environmental impacts to sixteen resource areas associated with the implementation of the goals, policies, and programs, including the potential rezone program, of the County's Housing Element Update (the "Project"). Our comments are primarily directed at the PEIR's analysis of Rezone Site No. 11, which is currently a portion of the Glen Annie Golf Course. In our review, we have identified several inaccuracies in the description of Rezone Site No. 11 and its surroundings, which have resulted in Rezone Site No. 11 and its possible redevelopment being incorrectly associated with a number of potentially adverse impacts. We detail each of these potentially adverse impacts below and provide additional information clarifying how the redevelopment of Rezone Site No. 11 will either not contribute to the associated impact or, in some cases, will actually help mitigate the associated impact.

We respectfully request that the County, in consideration of the information provided herein, implement our proposed revisions to the PEIR, as described below.

I. Summary of Comments

- The PEIR needs to differentiate between the portion of the Glen Annie Golf Course that will be rezoned for residential use (the "Rezone Site"), which consists of the flatter lower elevations areas and a smaller area toward the foothills, and the remainder of the golf course, which will not be rezoned, consisting of a majority of the existing golf course's

I.98-1

foothill and higher elevation areas (the "Restoration Site"). These higher elevation areas, which are the most visible to the public, will retain their current agricultural zoning and will be used as habitat restoration and open space when the golf course is decommissioned. Due to the topography of the area and the proposed landscape buffers, the residential uses on the Rezone Site will be substantially shielded from public view by the Restoration Site. Therefore, impacts to aesthetics and visual resources will be limited and, in some areas, potentially improved.

I.98-1 Cont.

- The Glen Annie Golf Course has not been used for agricultural operations in over 30 years and due to soil degradation and other environmental constraints, could not be used for future agricultural operations. Therefore, the rezoning of the Rezone Site for residential use would not have adverse impacts on existing agricultural operations or resources.

I.98-2

- The PEIR mistakenly characterizes the Rezone Site as being surrounded by active agricultural uses. In fact, the Rezone Site will primarily be bordered by the Restoration Site, residential uses, and Dos Pueblos High School. The residential uses towards the north of the Rezone Site will be bordered entirely by open space and habitat restoration to the north and northwest. The open space will act as a buffer between the residential uses and any fruit orchards located on the neighboring estates above the Rezone Site.

I.98-3

- The PEIR should be revised to recognize the significant positive impacts that the redevelopment of the Rezone Site will have on biological resources. The decommissioning of the golf course on the Restoration Site will replace the non-native grass that covers the majority of the golf course with native, drought-tolerant species and will undoubtedly benefit the native species in the area and greatly reduce the demand for water, fertilizers, herbicides, and pesticides, and reliance on powered landscaping equipment. Additionally, the redevelopment of the golf course, including any residential development of the Rezone Site, will continue to maintain many of the existing mitigation measures contained in the Glen Annie Golf Course's Conditional Use Permit Conditions of Approval and in its prior Environmental Impact Report.

I.98-4

- The PEIR improperly characterizes the redevelopment of the Rezone Site as being potentially inconsistent with several land use and planning policies, primarily those related to conversion of agricultural land and visual impacts to the Rural Area. For the same reasons described above, the redevelopment will not impact existing agricultural resources and only limited impacts – including some beneficial impacts - on visual resources.

I.98-5

- The PEIR does not recognize that the redevelopment of the Rezone Site requires decommissioning of the golf course and consequently the conversion of the Restoration Site from a portion of Glen Annie Golf Course to open space. As part of the redevelopment of the Rezone Site, the Restoration Site would be dedicated to open space and public amenities, including neighborhood, child-friendly parks, dog parks and an estimated four miles of hiking/running trails. These public amenities that would result from the conversion of the golf course will actually increase the number of public services and recreational facilities available to the public in the Goleta Valley area. The PEIR should be revised to reflect the fact that the redevelopment of the Rezone Site and the consequential conversion of the Restoration Site from golf course use to open space will help mitigate any potentially adverse impacts on public services and recreation. I.98-6

- The PEIR incorrectly characterizes the Rezone Site as being a high-risk area for wildfire. Based on information provided by the County Fire Department, the Rezone Site is well protected by well-established trees along the foothills located to the north. Thus, rezoning and redevelopment of the Rezone Site will not result in any adverse impacts to wildfire safety. I.98-7

II. Aesthetics and Visual Resources

The PEIR improperly characterizes the scope of the redevelopment of the Rezone Site and consequently overstates the potentially adverse impacts on the existing visual character or quality of public views in the County. Namely, the redevelopment is associated with Impact AV-2, which states: I.98-8

> *The proposed Project could degrade the existing visual character or quality of public views of a site and its surroundings in the Rural Area or potentially conflict with applicable zoning and other regulations governing scenic quality in the Urban Area, including policies and development standards of the County's Comprehensive Plan, Coastal Land Use Plan, and Community Plans.*[1]

The PEIR states that the Property is located in the County's "Rural Area" and the redevelopment "would transform a golf course surrounded by natural areas and agricultural uses into a residential neighborhood with up to 40 du/ac and four stories or more, which would be highly visible from public vistas in the foothills and local public roads, such as Glen Annie and Foothill Road."[2] The PEIR goes on to state that the redevelopment "would dramatically change the visual

[1] 3.1-23. All page numbers are in reference to the PEIR unless stated otherwise.
[2] 3.1-23

character of the site and the surrounding area, which is set at the base of the Santa Ynez Mountains, comprising foothill orchards and undeveloped hillsides and ridgelines."[3]

The Rezone Site will not be surrounded by natural areas and agricultural uses as the PEIR implies. The Rezone Site, outlined in yellow in the attached Exhibit A, is the only portion of the of the Glen Annie Golf Course that will be rezoned for residential use. The remainder of the golf course (over 80 acres) will not be rezoned for residential uses and will be converted to open space.[4] The Rezone Site is located immediately adjacent to the Urban/Rural Boundary, which runs along Cathedral Oaks Rd., and is bounded by Dos Pueblos High School to the southeast, outlined in blue, and single-family residential dwelling units to the southwest, outlined in purple. Additionally, much of the redevelopment's residential uses on the western side of the Rezone Site will be adjacent to a future housing development owned by Shelby Family Partnership, L.P. The Rezone Site is primarily surrounded by the Restoration Site, outlined in red, which will contain open space, habitat restoration, and other public recreational facilities. Several large residential estates, circled in dark red shown on Exhibit A, surround the Restoration Site and are adjacent to a small portion of the Rezone Site. The northern-most corner of the Rezone Site will border some neighboring residences with fruit orchards located on the properties, but as shown in the attached site plan as Exhibit B, the residential uses will be surrounded almost entirely by the Restoration Site.

The Project assigns the Rezone Site a zoning designation of DR 20/30 and DR 5. The PEIR incorrectly characterizes the allowed development on the Rezone Site as a "residential neighborhood with up to 40 du/ac and four stories or more." The PEIR fails to counterbalance the higher density housing permitted under the proposed zoning with the much lower density housing required by the DR 5 designation. The PEIR's failure to acknowledge the two zone designations (both of which are significantly less than the 40 du/ac cited in the PEIR) overinflates the potential visual impacts associated with the Rezone Site. As shown on the attached Exhibit B, the DR 20/30 designation allows for higher density residential to occur on the lower portions of the Rezone Site and the DR 5 designation allows for single family residences along the upper portions of the Rezone Site with the northern-most portion of the Rezone Site preserved as open space. The owner of the Rezone Site's request for the split zoning intentionally allows for smaller, shorter, less dense development on the steeper areas of the Rezone Site, which logically results in fewer visual impacts. The PEIR should reflect the correct zoning and intentional reduction of density required by the DR 5 zone designation.

I.98-8 Cont.

[3] 3.1-23.

[4] It goes without saying that the Restoration Site cannot remain in its current condition (i.e. one half of a golf course with no club house or other infrastructure) if the Rezone Site is developed. The permitted uses under the AG-II-40 zoning would allow for public recreation and open space, which are the most compatible and beneficial uses for the Restoration Site given its proximity to the Rezone Site.

The majority of the existing golf course's higher elevation areas, which are the most visible to the public, will not be rezoned for residential uses but rather, will be repurposed as open space on the Restoration Site. The surrounding steep hillsides and ridgelines are part of the Restoration Site, not the Rezone Site. Based on our in-person assessment of the Rezone Site, it is unlikely that the public views of the foothills from Glen Annie Rd. would be impacted by development of the Rezone Site simply due to the topography of the area. Additionally, the public's view from Cathedral Oaks Rd. is already limited by a tall berm that runs along the road.

Based on the designated zoning and topography of the area, the redevelopment of the Rezone Site will not "dramatically change" the visual character of the site and the surrounding area. To the contrary, those areas that are visible to the public may be improved by habitat restoration on the Restoration Site and portions of the Rezone Site, which will integrate a variety of native species[5] onto the property. For these reasons, and in conjunction with MM AV-1 (Objective Development Standards for Multiple-Unit and Mixed-Use Housing Projects) which will help ensure residential and mixed-use development is consistent with visual resource policies, zoning code standards, and applicable regulations, redevelopment of the Rezone Site is compatible with the existing character of the Rural Area. Thus, the PEIR should be revised to accurately reflect the two zoning designations of the Rezone Site and the 80+ acres of the existing golf course that will retain its current agricultural zoning.

I.98-8 Cont.

III. Agricultural Resources

The PEIR fails to properly acknowledge that the Rezone Site is not currently in active agriculture and incorrectly identifies the redevelopment of the Rezone Site as having potentially adverse impacts on the existing agricultural resources in the County under Impact AG-2. Impact AG-2 provides:

> *The proposed Project would potentially convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning, but would not conflict with Williamson Act contracts or the County's agricultural preserve programs.*[6]

I.98-9

The PEIR states that the Rezone Site is zoned AG-II-40 and is "currently developed as a golf course surrounded by productive rural agricultural uses such as orchards."[7] While the Rezone Site is currently zoned as agricultural, it has not been used for agricultural purposes in over 30

[5] Note that these native species are also expected to be fire resistant and thereby will not increase any risk of wildfires, as discussed below.
[6] 3.2-30.
[7] 3.2-30.

years. Furthermore, the Rezone Site is almost entirely surrounded by the remainder of the Glen Annie Golf Course, which is not a "productive rural agricultural use." It is important that the PEIR correctly identify the Rezone Site, which is only a portion of the existing golf course, not the entire golf course. Neither the Rezone Site nor the Restoration Site are highly productive with existing greenhouses and row crops, nor do they contain any active, high-value agriculture on Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance.[8] Moreover, due to soil degradation and other environmental constraints resulting from the 30+ years of golf course use, the Rezone Site would not be viable for *future* agricultural operations. Therefore, preserving the agricultural zoning on the Rezone Site would not help mitigate the loss of agricultural productivity on the South Coast.

Conversion of the Rezone Site will also not impact surrounding agricultural uses. As explained above and demonstrated in Exhibit A, the Rezone Site is primarily neighbored by a high school and residential uses to the east, south, and west and the Restoration Site to the north. On the hills along a small portion to the north of the Rezone Site are some larger residential estates with fruit orchards, however, the Rezone Site will be buffered by the Restoration Site. The Restoration Site is not viable for conversion to active agriculture and will be repurposed as open space and public recreation and will serve as a large buffer between the Rezone Site and any potential agricultural uses to the north.

Moreover, conversion of the Rezone Site will not result in any agricultural lands being isolated or surrounded by incompatible urban uses, thereby "severely reducing and possibly eliminating the viability of these lands for agricultural uses."[9] This is not an issue for the Rezone Site as it is already mostly surrounded by residential and urban uses, rather than being located in the center of productive agricultural operations. Therefore, conversion of the Rezone Site to residential is compatible with the surrounding uses, will not cut off any contiguous agricultural areas, and is not likely to result in or necessitate the conversion of any nearby agricultural properties.

For these reasons, the PEIR should be revised to clearly distinguish the Rezone Site from agricultural properties currently used for agricultural purposes and recognize that the rezoning and redevelopment of the Rezone Site would not have adverse impacts on existing agricultural resources.

I.98-9 Cont.

[8] 3.2-32.
[9] *See* 3.2-31 – 3.2-32.

IV. Biological Resources

The PEIR fails to consider the existing Conditions of Approval and prior Environmental Impact Report certified for the Glen Annie Golf Course, which include specific mitigation measures and conditions of approval that survive termination of the golf course.

Impact BIO-1 states:

> *The proposed Project could impact ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities.*[10]

Figure 3.4-2[11] of the PEIR shows that there are three riparian corridors, including Glen Annie Creek (also called Tecolotito Creek), located on or near the golf course. This Figure does not identify any County-designated Environmentally Sensitive Habitat ("ESH") located on or near the golf course. The PEIR claims that the redevelopment "could impact riparian habitat, including riparian habitat within the Riparian Corridor Overlay along an unnamed drainage on the western portion of the site, the bordering perennial segment of Glen Annie Canyon and Tecolotito Creek, and onsite coastal sage scrub habitat."[12] Additionally, "[d]epending on the scale and location of future development, construction activities could result in a loss of or temporary disturbance to onsite riparian habitat and/or wetlands."[13]

I.98-10

The Glen Annie Golf Course is currently subject to a number of Conditions of Approval ("COAs") adopted under the 1996 Conditional Use Permit ("CUP") for the operation of the course, many of which will continue after termination of the CUP.[14] These COAs, for example, require a tree protection and replacement program, a Final Wetland Mitigation Plan ("FWMP"), and a Biological Resources Mitigation Plan ("BRMP") to mitigate the course's impacts on trees, wetlands, and biological habitats.[15] The COAs contain specific requirements for construction, maintenance, and water quality monitoring of the creeks and drainages and specifically require that Devereux Creek/Drainage A be protected by the owners of the property in perpetuity.[16] Mitigation measures contained in the prior EIR addressing these same areas of concern are also expected to be maintained on the property. Additionally, the redevelopment of the Rezone Site will comply with the PEIR's mitigation measures which require a detailed Tree Protection Plan

[10] 3.4-28.
[11] 3.4-11.
[12] 3.4-29.
[13] 3.4-30.
[14] The rezoned portions of the Property, i.e. the Rezone Site, will be subject to its own environmental review and mitigation measures. However, it is likely that the existing COAs and prior EIR mitigation measures will be integrated into any new mitigation measures for the Rezone Site.
[15] *See* 1996 CUP COAs, Condition Nos. 19.1 and 19.2.
[16] *See* 1996 CUP COAs, Condition Nos. 19.2, 20-27.

(MM BIO 1), Habitat Protection Plan (MM BIO 2), and Wildlife Movement Plan (MM BIO 3), prepared by a County-approved biologist and submitted as part of its development application materials for County review and approval.

In total, there are substantial safeguards in place to ensure that the redevelopment does not cause any potentially adverse impacts to riparian or wetland habitats on the Rezone Site.

Impact BIO-2 provides:

> *The proposed Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS.*[17]

As shown in Figure 3.4-1,[18] there is no federally designated critical habitat for any species located on or near the Rezone Site or the Goleta Valley. However, the PEIR indicates that the Rezone Site, located adjacent to a perennial reach of Glen Annie Canyon and Tecolotito Creek, could create impacts to limited populations of protected fish and turtles, associated with flood control improvements and importation of fill.[19] The PEIR also notes that "California red-legged frogs and California tiger salamanders are known to use fields that are currently in agricultural production during dispersal and migration. These species move between aquatic habitats traversing through upland areas; they may remain in suitable terrestrial habitats for periods of several months to years… Therefore, aquatic and terrestrial breeding and migration areas are required for species conservation."[20]

Although we have not yet performed the necessary biological studies to confirm whether any threatened or endangered species are currently or have been recently located on the Rezone Site, any redevelopment will nevertheless implement the necessary mitigation measures and continue to implement the existing COA and mitigation measures called for in the prior EIR, including those discussed above, to reduce any potentially adverse impacts to any beneficial species that may be located on or near the Rezone Site. From a holistic standpoint, replacement of the non-native grass that covers the majority of the existing golf course with native, drought-tolerant species will undoubtedly benefit the native species in the area and greatly reduce the Rezone Site's demand for water, fertilizers, herbicides, and pesticides. Additionally, the decommissioning of the golf course will reduce the Rezone Site's reliance on powered lawn and gardening equipment, which present a high risk of injury or death to species in the area.

I.98-10 Cont.

[17] 3.4-31.
[18] 3.4-10.
[19] 3.4-32.
[20] 3.4-13.

Therefore, the redevelopment will likely have an overall positive impact on any special-status species and their habitats discussed in Impact BIO-2. The PEIR should be revised to reflect these positive impacts.

Impact BIO-3 states:

> *The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.*[21]

Specific to the Rezone Site, the PEIR indicates that the redevelopment could cause disruption or block species movement or migration along Glen Annie Canyon and Tecolotito Creek, particularly if substantial flood control or drainage improvements are required.[22] The Tecolotito Creek is located to the southeastern-most side of the Rezone Site with only a very small section of the creek crossing onto the Rezone Site. No additional drainage, fill, or flood control improvements are expected to be required for Tecolotito Creek.

Sediment runoff during construction will be limited as the majority of construction will take place on the lower elevations. Again, the steeper sloped portions of the golf course will not be rezoned. The redevelopment will maintain any existing runoff control structures required by the COAs.[23] Similar restrictions on timing for construction will also be adhered to.

The PEIR should be revised to acknowledge the existing COAs for the golf course and Rezone Site, as well as the prior EIR and related mitigation measures. The existing protections and habitat restoration that is part of the existing golf course should be considered in the PEIR's analysis of potential biological impacts.

Finally, Impact BIO-4 provides:

> *The proposed Project could conflict with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources.*[24]

The PEIR states that the redevelopment could result in significant impacts on creek corridors protected by County policies due to the potential future importation of large

I.98-10 Cont.

[21] 3.4-33.
[22] 3.4-33.
[23] CUP COAs Condition Nos. 19.2-22, 27.
[24] 3.4-34.

amounts of fill and other flood control improvements.[25] Specifically, the redevelopment would occur on or adjacent to sensitive habitat associated with creeks in Eastern Goleta Valley.[26]

For the reasons detailed above, the redevelopment will not result in adverse impacts on the creek corridors protected by the County's policies but rather, is expected to improve these corridors by creating designated habitat restoration areas.

We have further identified a number of policies associated with biological resources that we believe the redevelopment will advance. For example, Eastern Goleta Valley Community Plan ("EGVCP"), which has been identified as a potential guideline for analyzing and selecting sites for rezoning in Goleta Valley, contains the following policies compatible with the redevelopment of the Rezone Site:

> ***OBJECTIVE ECO-EGV-2:*** Preserve and enhance the vitality of biological resources of Eastern Goleta Valley.[27]
>
> ***Policy ECO-EGV-2.1:*** Open space and conservation easements should be considered effective methods to preserve important biological resources and habitats.[28]
>
> ***Policy ECO-EGV-2.2:*** The use of native, drought-tolerant, and/or fire-resistant plants shall be strongly encouraged in landscaping and restoration projects, especially in parks, buffers adjacent to native habitats and in designated open space.[29]
>
> ***Policy ECO-EGV-5.1***: Environmentally Sensitive Habitat (ESH) areas and Riparian Corridors (RC) within Eastern Goleta Valley shall be protected and, where feasible and appropriate, enhanced.[30]
>
> ***Policy WAT-EGV-2.1***: In order to minimize water demand, development shall utilize water conserving landscaping and low flow irrigation and plumbing to the maximum extent feasible.[31]

The redevelopment will enhance the vitality of the biological resources in the area by creation of open space and implementation of native, drought-tolerant, and fire-resistant

I.98-10 Cont.

[25] 3.4-34.
[26] 3.4-34.
[27] EGVCP at p. 131.
[28] EGVCP at p. 131.
[29] EGVCP at p. 131.
[30] EGVCP at p. 145.
[31] EGVCP at p. 83.

plant species on the Restoration Site and portions of the Rezone Site. This will protect and enhance the riparian corridors located on and near the Rezone Site. Additionally, as explained above, conversion of the existing golf course will replace the non-native grass that covers the majority of the course with native, drought-tolerant species and water-conserving landscaping, which will decrease the demand for irrigation water. A reduction in irrigation will also reduce the potential for harmful runoff into nearby drainages and creeks.

I.98-10 Cont.

V. Land Use and Planning

The Rezone Site is improperly identified as having potentially adverse impacts associated with the County's established land use goals and policies. Impact LU-2 states:

> *The proposed Project could result in adverse environmental impacts due to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.*[32]

Table 3.10-3 in the PEIR outlines the Project's consistency with relevant Santa Barbara County Comprehensive Plan ("Comprehensive Plan") policies. The Rezone Site is specifically noted in relation to two Comprehensive Plan policies, discussed below.[33]

I.98-11

Policy III.A. of the Comprehensive Plan's Agricultural Element states that expansion of urban development into active agricultural areas outside of urban limits is to be "discouraged" as long as infill development is available.[34] The proposed Project could result in the rezoning of rural agricultural areas to housing, "as exemplified by [] Glen Annie, which is zoned AG-II-40 and located north of the City of Goleta."[35] While rezoning the Rezone Site would result in the conversion of AG-II zoned lands to urban uses, the PEIR recognizes that the site is currently developed as a golf course.[36] However, it also states that the Rezone Site is "surrounded on three sides by productive rural agricultural uses such as orchards."[37] If selected, the PEIR asserts that conversion of this site may be inconsistent with this policy if infill development in the Urban Area is available.[38]

First, as discussed above, the Rezone Site is <u>not</u> used for active agricultural purposes and has not been used for such purposes for over 30 years. Because this policy is specifically related to urban

[32] 3.10-25.
[33] 3.10-31.
[34] 3.10-31.
[35] 3.10-31.
[36] 3.10-31.
[37] 3.10-31.
[38] 3.10-31.

expansion into "active agricultural areas," it is not relevant to the Rezone Site and thus, is not applicable. Second, the Rezone Site is not surrounded on three sides by productive agricultural uses. As shown on Exhibit A, the Rezone Site is primarily bordered by residential uses and the high school to the east, south, and west and by the Restoration Site, which is not active agriculture, to the north and northwest. As shown on Exhibit B, 80+ acres of open space will act as a buffer between the Rezone Site and any existing fruit orchards. Therefore, the redevelopment of the Rezone Site is not inconsistent with Policy III.A. regardless of whether any infill development in the Urban Area is available.

Policy 3 of the Comprehensive Plan's Land Use Element states that no urban development shall be permitted beyond boundaries of land designated for urban uses except in neighborhoods in rural areas.[39] The Project would facilitate some new housing development in the Rural Area, such as the redevelopment of the Rezone Site which "would transform a golf course surrounded by natural areas and agricultural uses into an urban residential neighborhood with up to 40 du/ac and up to four or more stories."[40] Development of the Rezone Site along with other sites in the Rural Area would require an expansion of the Urban/Rural Boundary by the Board.[41] The PEIR correctly finds that such expansion of the Urban Area would ensure that housing development on selected sites is consistent with the Land Use Element.[42]

I.98-11 Cont.

As explained above, the Rezone Site is not surrounded by natural areas and agricultural uses and cannot be developed with residences at an overall density of 40 du/ac. As stated above, the Rezone Site is primarily surrounded by an existing golf course, single-family residences, and a high school. There are large estates with fruit orchards located to the north of the Rezone Site, but the Restoration Site largely buffers the Rezone Site from these estates. The PEIR is correct that development of urban uses in the Rural Area would require the expansion of the Urban/Rural Boundary. However, this expansion is logical because the Rezone Site is already located on the edge of the Boundary and is part of an existing neighborhood. Again, the remainder of the golf course will not be rezoned. Provided that this expansion is approved by the Board, the redevelopment of the Rezone Site will not conflict with Policy 3 as it will be located in an area designated for urban uses.

The Rezone Site is also associated with Impact LU-3, which provides:

> *The proposed Project could potentially cause adverse quality-of-life effects on existing communities due to traffic, noise, or other physical environmental impacts.*[43]

I.98-12

[39] 3.10-42.
[40] 3.10-42.
[41] 3.10-42.
[42] 3.10-42.
[43] 3.10-61.

The PEIR states that Rural Area residents could be highly sensitive to visual changes from land use and development because they generally experience views with relatively less dense development than in urbanized areas, within the context of panoramic views of open lands.[44] The Rezone Site is provided as an example because it is located at the base of the Santa Ynez Mountains, "an area that is highly visible from the Rural Area in the foothills."[45]

As detailed above, the residential development on the Rezone Site will be primarily located on lower elevations and generally out of public view from nearby public viewpoints such as Glen Annie Rd. and Cathedral Rd. Most of the higher elevations of the existing golf course are not part of the Rezone Site and will remain in the AG-II zone. Development of the Rezone Site's northern areas will be limited by the DR 5 zone designation. Views of the Rezone Site from the Rural Area in the foothills will likely also be limited by the topography of the area, as much of the residential development will be located in the lower valleys. Views from private properties, as opposed to public viewpoints, should not be considered here. We also reiterate that the existing golf course is not currently "open land" but rather has been highly developed over the last 30 years with highly modified topography, improvements, and a large club house.

I.98-12 Cont.

VI. Public Services and Recreation

The PEIR fails to recognize that the redevelopment of the Rezone Site and conversion of the existing golf course will actually increase the number of existing parks and recreational facilities in the area and incorrectly identifies it as having potentially adverse impacts associated with Impact PSR-5, which states:

> *The proposed Project could increase the use of existing parks and recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or could require the construction or expansion of recreational facilities which might have an adverse impact on the environment.*[46]

I.98-13

The PEIR explains that the proposed Project could increase the population of the County by up to 99,873 people in the unincorporated area of the County.[47] This projected additional population would increase demand for recreational facilities and depending on levels of use for certain facilities, could accelerate the deterioration of public parks and recreation due to intensified overuse.[48] The Rezone Site is identified by the PEIR as located within an underserved area, with the nearest public park located in Isla Vista, approximately four miles to the south, or Tucker's

[44] 3.10-62.
[45] 3.10-62.
[46] 3.13-51.
[47] 3.13-51, Table 3.13-12.
[48] 3.13-51.

Grove Park approximately 9 miles to the east.[49] Accordingly, the PEIR predicts that future residents of the Rezone Site and other potential rezone sites within the South Patterson Agricultural Area may need to utilize parks and recreation provided in the City of Goleta, as these potential sites lie adjacent to the city boundary.[50]

Any redevelopment of the Rezone Site requires decommissioning the existing golf course. Because the Rezone Site makes up only a portion of the golf course, the remainder of the course (i.e. the Restoration Site) must also be converted to a new use. Since the Restoration Site will remain in the AG-II zone, the allowed uses are very limited and due to the significant alteration of the land, the Restoration Site is not available for future agricultural use. Given that the Rezone Site will house many new residents, the logical and permitted use of the Restoration Site will be open space and public recreation. Currently, the redevelopment of the Rezone Site proposes to include the redevelopment of the Restoration Site to create over 100 acres of land dedicated to open space and public amenities, including neighborhood, child-friendly parks, and dog parks. These parks and amenities will be open to the general public and will effectively open up use of the existing golf course to a much wider range of individuals. Thereby, the redevelopment will decrease the population's reliance on nearby parks in Isla Vista or Tucker's Grove. Accordingly, the PEIR should be revised to analyze the proposed redevelopment's positive impacts on public services and recreation.

I.98-13 Cont.

VII. Wildfire

The Rezone Site is improperly associated with having potentially adverse impacts on the risk of wildfires in the County. The Rezone Site is discussed in relation to several wildfire impacts including WF-2 and WF-3. Impact WF-2 states:

> *The proposed Project would potentially exacerbate wildfire risks and could expose existing or future residents to pollutant concentrations and the uncontrolled spread of wildfire at several sites throughout the county, particularly within the WUI or in High/Very High FHSZs.*[51]

I.98-14

The PEIR notes that the Rezone Site is located in the wildland-urban interface ("WUI") area at the base of the Santa Ynez foothills adjacent to undeveloped sloped areas "with highly combustible vegetation"[52] that have "been subject to multiple historic wildfires."[53] Based on the information provided by the Santa Barbara County Fire Department Division Chief Robert Hazard at the Glen Annie Project Public Meeting held on January 29, 2024, the Rezone Site is

[49] 3.13-52.
[50] 3.13-53.
[51] 3.16-29.
[52] 3.16-29.
[53] 3.16-27.

well protected from wildfire risk due to the acres of fruit orchards located in the foothills above the existing golf course. These fruit orchards are not highly combustible; to the contrary, they act as a substantial fuel break. Because of this fuel break, Dos Pueblos High School was able to be used as a firefighting base during one of the local wildfires. Division Chief Hazard indicated that he would only become concerned about an increase in wildfire risk in this area if the orchards in the foothills to the north were proposed for redevelopment. Moreover, the Rezone Site will be buffered from any potential wildfires by the Restoration Site. The PEIR should therefore be revised to acknowledge the information provided by the County Fire Department.

I.98-14 Cont.

VIII. Conclusion

We appreciate your consideration of these comments and look forward to reviewing the final PEIR. Please do not hesitate to contact me with any questions.

Very truly yours,

Graham M. Lyons of
Mullen & Henzell L.L.P.

4891-8158-4290, v. 4

EXHIBIT "A"

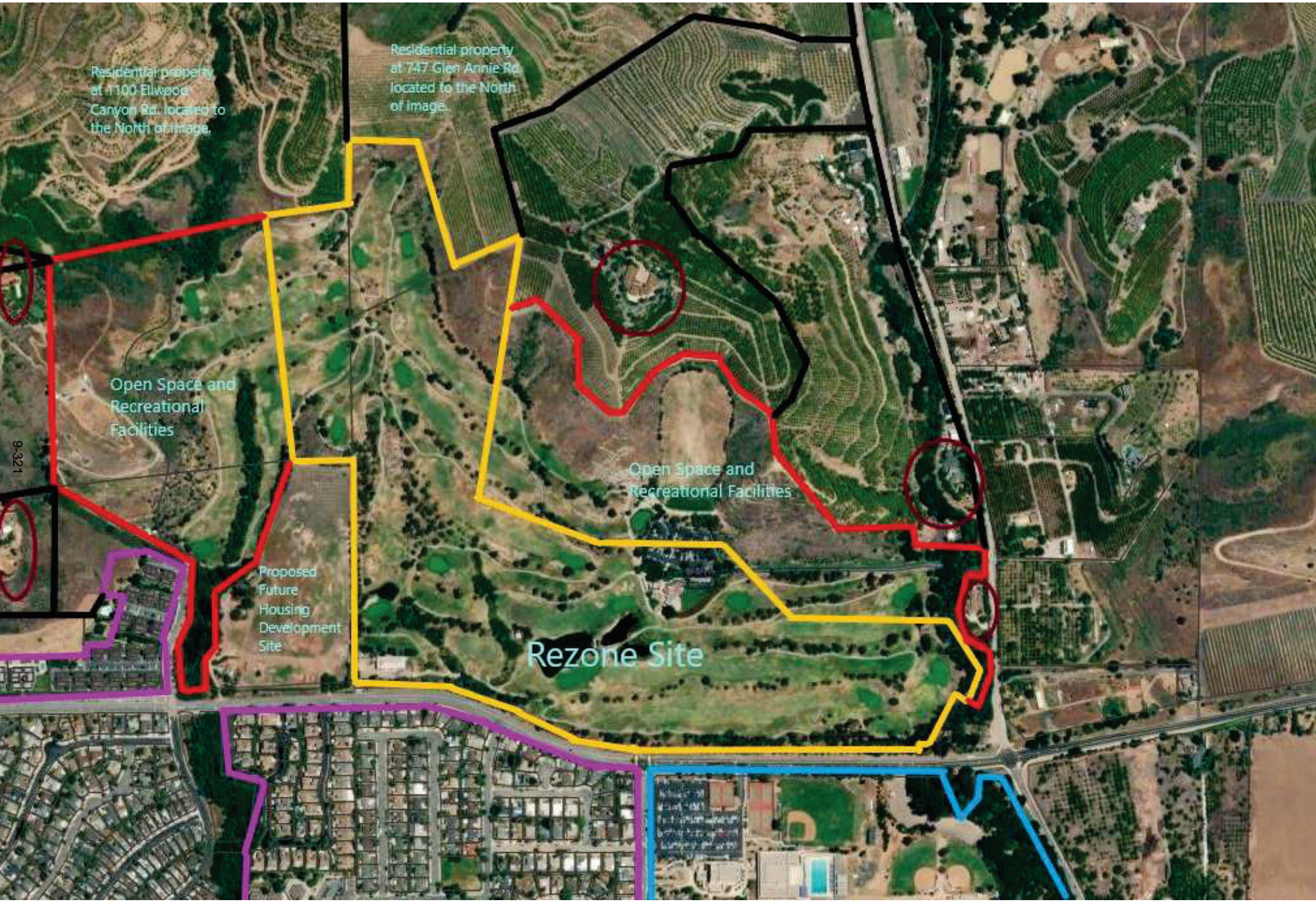

Residential property at 4100 Elwood Canyon Rd. located to the North of image.
Residential property at 747 Glen Annie Rd. located to the North of image.
Open Space and Recreational Facilities
Open Space and Recreational Facilities
Proposed Future Housing Development Site
Rezone Site

EXHIBIT "B"


LEGEND
1 Public Community Center + Public Pool + Ranch Market
2 Public Botanical Garden Area
3 Primary Community Entry
4 Secondary Community Entry
5 Child Care Center
6 Public Park with Playground and Open Space
7 Public Pickleball Courts
8 Public Dog Park
9 Fire Break
10 Public Trailhead
11 Habitat Restoration Area
12 Public Community Trail Network (±4.0 Miles)
13 Open Space/Landscape Buffer
14 Public Parking
15 Public Bus Stop and Bus Route [Route10, 23]
16 On-Street Trail Extension
RESIDENTIAL 5 D.U. / ACRE
RESIDENTIAL 5 D.U. / ACRE
PROPOSED FUTURE HOUSING DEVELOPMENT SITE [CITY OF GOLETA]
RESIDENTIAL 10 D.U. / ACRE
RESIDENTIAL 15 D.U. / ACRE
RESIDENTIAL 20 D.U. / ACRE
RESIDENTIAL 15 D.U. / ACRE
RESIDENTIAL 30 D.U. / ACRE
AFFORDABLE HOUSING 30-40 D.U. / ACRE
EX. RESIDENTIAL 12.8 D.U. / ACRE
EX. RESIDENTIAL 6.5 D.U. / ACRE
EX. RESIDENTIAL 5.2 D.U. / ACRE
EX. RESIDENTIAL 6.1 D.U. / ACRE
GLEN ANNIE RD
CATHEDRAL OAKS RD
DOS PUEBLOS HIGH SCHOOL

Comment Letter I.98 – [Graham M. Lyons, Mullen & Henzell LLP]

Comment Response I.98-1

The comment presents a summary of the comments provided later in this letter, including comments asserting the EIR is inadequate in its description and analysis of Rezone Site No. 11 (Glen Annie). Detailed responses to each of the discrete comments provided in this comment letter are provided below.

The comment further states that the EIR must differentiate between the portion of Rezone Site No. 11 (Glen Annie) that would be rezoned for residential use and the portion of the site that would not be rezoned. The comment also asserts that the EIR must analyze Rezone Site No. 11 based upon concept site plans.

The EIR's analysis of potential impacts associated with potential rezoning and future development of Rezone Site No. 11 is based on the sites inventory and proposed zoning designations for the three APNs 077-530-021, 077-530-020, and 077-530-012. The commenter asserts that the EIR must analyze the project described and shown in concept site plans (Exhibit A and B) submitted with their comment letter in March 2024. This is not correct. The EIR is a program environmental document that analyzes the proposed Project at a programmatic level. As a result, the EIR does not analyze specific sites or site plans for specific projects. Furthermore, the commenter did not submit the concept site plans in a timely manner. The County received the concept site plans in March 2024, more than a year after the County issued of the Notice of Preparation (NOP) and completed the EIR scoping process for the proposed Project. Nonetheless, the EIR analyzed the potential maximum buildout for Rezone Site No. 11 as well as all sites identified in the sites inventory, as described in Chapter 3, *Environmental Impact Analysis*.

With regard to comments concerning the EIR's analysis of potential impacts to aesthetics and visual resources associated with the potential development of Rezone Site No. 11, a detailed discussion and analysis of such issues is presented in Section 3.1, *Aesthetics and Visual Resources.* Included in this analysis is a detailed discussion of potentially feasible mitigation measures for reducing the impacts associated with the proposed Project at a programmatic level, as appropriate under this EIR. The EIR also discloses where mitigation would not be feasible for fully reducing impacts to an insignificant degree. As stated above, it is outside the scope and would not be appropriate for the Program EIR to analyze specific aesthetic and visual resource impacts associated with Rezone Site No. 11 based on concept site plans (Exhibit A and B of the comment letter), or any other housing site included in the sites inventory.

Comment Response I.98-2

The comment asserts that while Rezone Site No. 11 (Glen Annie) is currently zoned agriculture, the site has not been used for agricultural operations in over 30 years, and rezoning of the site would not have adverse impacts on existing agricultural operations or resources.

Detailed discussion and analysis of potential impacts to agricultural resources from the rezoning of lands zoned agriculture or which currently support agricultural uses or agricultural resources is presented in Section 3.2, *Agricultural Resources.* As discussed therein, impacts are assessed based on the thresholds of significance adopted under the County's *Environmental Thresholds and Guidelines Manual* (2021) and the thresholds for impacts to agricultural resources in Appendix G of the CEQA Guidelines. As analyzed in Impact AG-2, Rezone Site No. 11 (Glen Annie) is zoned AG-II-40 and located

north of the City of Goleta; this site is currently developed as a golf course and is surrounded by productive rural agricultural uses, such as orchards. If selected as part of Program 1 (Potential Rezone Program) of the Housing Element, rezoning of this site, along with other sites in the Rural Area currently zoned agriculture, for higher-density (i.e., 20 units per acre or more) would convert existing agricultural-zoned land in the Rural Area to residential and/or mixed use development. This conversion would result in a substantial loss of agricultural resources on the South Coast. Based on the adopted thresholds of significance, the conversion of these agriculturally zoned lands and loss of agricultural resources would constitute a potentially significant impact to agricultural resources. Therefore, the EIR's analysis of agricultural resources is correct and appropriate.

Comment Response I.98-3

The comment asserts that the EIR mistakenly characterizes Rezone Site No. 11 (Glen Annie) as being surrounded by active agricultural uses, Dos Pueblos High School, and the "Restoration Site" identified and described in concept site plans prepared by the owner/developer of Rezone Site No. 11 (Glen Annie).

The referenced discussion in Impact AG-2 has been revised to reflect that Rezone Site No. 11 (Glen Annie) is zoned AG-II-40 and located north of the City of Goleta; is currently developed as a golf course and is surrounded by residential uses and Dos Pueblos High School to the south, open lands and golf course to the west, and open lands, golf course, and productive rural agricultural uses to the north and east. However, it should be noted that this clarification in the uses surrounding Rezone Site No. 11 (Glen Annie) does not change the EIR's analysis of impacts associated with conversion of agriculturally zoned lands, and the EIR continues to consider impacts based on the potential conflicts arising from the conversation of agriculturally zoned lands within the Rural Area.

With regard to the "Restoration Site", site plans for this site, and any other sites included in the sites inventory have been prepared independently by prospective developers of such sites, and these site plans are not directly related to the actions of the Project as proposed by the County and described in Chapter 2, *Project Description.* As such, consideration of site-specific impacts based on these concept site plans is outside the scope of the analysis and is inappropriate for this Program EIR.

Comment Response I.98-4

The comment states that the EIR should be revised to recognize the significant positive impacts that selection and redevelopment of Rezone Site No. 11 (Glen Annie) would have on biological resources, due to decommissioning of the golf course and restoration of adjacent properties which would replace golf course development.

With regard to project-specific impacts, please refer to Master Response 2. Further, the EIR's analysis of potential impacts, including impacts to biological resources as presented in Section 3.4, *Biological Resources,* is based on the existing conditions and environmental setting for the affected properties at the time of issuance of the NOP and potential maximum buildout for the site based on the sites inventory and maximum buildout scenario described in Chapter 3, *Environmental Impact Analysis.* The commenter references concept site plans prepared for Rezone Site No. 11 appended to their comment letter. However, the County has not received any formal development application or site plans for the potential development of Glen Annie. Furthermore, this comment letter and associated conceptual plans was received after issuance of the NOP and completion of the EIR scoping process, following the publication of the Draft EIR. Further, site plans for this site, and any other sites included in the sites inventory have been prepared independently by prospective developers of such sites, and

these site plans are not directly related to the actions of the Project as proposed by the County and described in Chapter 2, *Project Description.* As such, consideration of impacts, including biological resources, associated with development of Rezone Site No. 11 (Glen Annie) based on these concept site plans is outside the scope of the analysis and is inappropriate for this Program EIR.

Further, with regard to comments pertaining to the 1993 Glen Annie Golf Course EIR, as well as the Glen Annie Golf Course Conditional Use Permit and Conditions of Approval, the conditions of approval and mitigation measures required for the Glen Annie Golf Course as required by the 1993 Glen Annie Golf Course EIR were adopted and implemented specifically for development and operation of the existing golf course facilities. These conditions and mitigation measures would not be applicable to future development of the Rezone Site No. 11 (Glen Annie) and do not survive the termination of the golf course as assumed in this EIR.

Comment Response I.98-5

The comment asserts that the EIR improperly characterizes redevelopment of Rezone Site No. 11 (Glen Annie) as being potentially inconsistent with several land use and planning policies relating to the conversion of agricultural land and visual impacts. The comment further states that selection and redevelopment of the site would not result in impacts to existing agricultural resources and would result in only limited impacts – including some beneficial impacts – on visual resources.

With regard to analysis of project-specific impacts, please refer to Master Response 2. Please also refer to Comment Responses I.98-1 through I.98-4 above.

Comment Response I.98-6

The comment states that the EIR does not recognize that development of Rezone Site No. 11 (Glen Annie) would require decommissioning of the golf course and development of the site based on concept site plans submitted for Rezone Site No. 11 (Glen Annie), which would include development of portions of the site as open space, with numerous public amenities and recreational facilities.

Please refer to Comment Responses I.98-1 and I.98-4 above.

Comment Response I.98-7

The comment states that the EIR incorrectly characterizes Rezone Site No. 11 (Glen Annie) as being within a high-risk area for wildfire and references uncited information that the County Fire Department asserts that Rezone Site No. 11 (Glen Annie) is well protected from wildfire hazards.

Detailed discussion and analysis of potential impacts to wildfire risks and hazards is presented in Section 3.16, *Wildfire.* Impact WF-1 identifies that Rezone Site No. 11 (Glen Annie) is located within the Wildland-Urban Interface (WUI), a mapped wildfire hazard area. As discussed in Impact WF-2, new residential development within wildfire hazard areas would exacerbate wildfire risks to future residents. Impact WF-2 specifically states that the location of Rezone Site No. 11 (Glen Annie) in the WUI and at the base of the Santa Ynez foothills adjacent to undeveloped sloped areas with combustible vegetation makes the site susceptible to wildfire risk for potential future residents. The EIR qualifies this statement and describes that Glen Annie "while potentially exposed to wildfires originating in the foothills, is more heavily buffered under current conditions by irrigated orchards" in comparison to a number of other potential housing sites in the Rural Area.

While surrounding uses and development may provide additional protection of individual sites which are mapped within the Fire Hazard Severity Zone (FHSZ) and WUI, individual site-specific analysis and consideration of site-specific characteristics that might reduce or avoid wildfire risks is outside the scope of this Program EIR. The EIR correctly identifies impacts related to potential exacerbation of wildfire risks to future and existing residents as significant and unavoidable.

Comment Response I.98-8

The comment asserts that the EIR improperly characterizes the scope of development of Rezone Site No. 11 (Glen Annie) and overstates potential adverse impacts on aesthetics and visual resources. Please refer to Comment Response I.98-1. The commenter asserts the EIR mischaracterizes the potential rezone as DR 30/40 and DR 1.5 rather than a proposed zoning of DR 20/30 and DR 5.

Concerning consideration of conceptual site plans submitted for Rezone Site No. 11 (Glen Annie) in the analysis of potential impacts associated with development of this site, please refer to Comment Response I.98-4.

As described in Chapter 2, *Project Description,* this Program EIR evaluates the potential impacts associated with future housing development enabled under the Housing Element Update. Details regarding the description of the proposed Project were developed and refined as part of preparation of this EIR and are based upon the June 2023 version of Draft 2023-2031 Housing Element Update documents which represented the most up-do-date version available at the time of preparation of the EIR. In the June 2023 version of the Draft 2023-2031 Housing Element Update documents, the proposed zoning for Rezone Site No. 11 (Glen Annie) was DR-1.5 and DR-30/40. As such, Chapter 2, *Project Description* reflected this information, which was then accurately characterized and analyzed as part of the EIR's impact analysis. As presented in Appendix B of the EIR, based on the maximum worst-case scenario assumptions described in Chapter 3, *Environmental Impact Analysis,* development of Rezone Site No. 11 (Glen Annie) under this potential rezoning would result in up to 2,600 new multifamily units and 73 new single-family dwellings, for a total of 2,673 new units. However, in September 2023 during the midst of preparation of the EIR, the County published a revised Draft 2023-2031 Housing Element Update which modified to the proposed zoning of Rezone Site No. 11 (Glen Annie) to DR-5 and DR-20/30. Utilizing the EIR's methodology for the developing the maximum worst-case buildout for the proposed Project, rezoning of Rezone Site No. 11 (Glen Annie) to DR-5 and DR-20/30 would result in the potential buildout of up to 1,950 new multifamily units and 289 new single-family dwellings, for a total of 2,239 new units, 434 units less than is analyzed in the EIR's maximum buildout scenario. As such, while not specifically reflected in this EIR, this change in the proposed zoning for Rezone Site No. 11 (Glen Annie) does not affect the EIR's worst-case analysis of impacts, and the analysis covers the potential impacts of the now proposed lower development potential of Rezone Site No. 11 (Glen Annie).

It should further be noted that zoning assigned to or proposed for selected potential rezone sites, along with the selection of sites to be rezoned, is ultimately at the discretion of the County Board of Supervisors.

Comment Response I.98-9

The comment asserts that while Rezone Site No. 11 (Glen Annie) is currently zoned agriculture, the site has not been used for agricultural operations in over 30 years, and rezoning of the site would not have adverse impacts on existing agricultural operations or resources.

With regard to analysis of project-specific impacts, please refer to Master Response 2. Please also refer to Comment Response I.98-2.

Comment Response I.98-10

The comment asserts that the EIR fails to consider the existing 1993 Glen Annie Golf Course EIR, as well as the Glen Annie Golf Course Conditional Use Permit and Conditions of Approval, which include site-specific mitigation measures and conditionals of approval applicable to the Glen Annie Golf Course. Please refer to Comment Response I.98-4.

The comment also requests site-specific information and consideration regarding Rezone Site No. 11 in regard to biological resources. Please refer to Master Response 2. While the EIR does not provide site-specific analysis of impacts associated with Rezone Site No. 11 (Glen Annie), the EIR presents a programmatic analysis of potential impacts associated with the rezoning and potential future development of all sites included in the sites inventory by comparing the location of potential residential and mixed use developments to the location of known biological resources or areas with a high potential for biological resources. However, as noted above, a complete analysis of potential site-specific impacts is not possible as site-specific development plans and site-specific biological resource assessments were generally unavailable at the time of drafting the Program EIR. Therefore, the description of the environmental setting is based on information provided in previous long-range planning documents, recent EIRs prepared by the County, and associated technical studies. (See *Methodology* discussion under Section 3.4.4.1, *Thresholds of Significance.*)

As identified in 3.4.4.4, *Proposed Mitigation,* to address these programmatic impacts, the EIR identifies and requires implementation of **MM BIO-1 (Tree Protection Plan)**, **MM BIO-2 (Habitat Protection Plan)**, and **MM BIO-3 (Wildlife Movement Plan).** Detailed site-specific evaluation of each applicable site required as part of these measures, including Rezone Site No. 11 (Glen Annie), is recognized in both the comment letter and the EIR as necessary to address and mitigate site-specific impacts. The Program EIR appropriately identifies in Section 3.4.4.2, *Project Impacts* of Biological Resources significant and unavoidable impacts at a programmatic level given the uncertainty that the implementation of these mitigation measures could effectively be utilized to fully protect sensitive biological resources.

With regard to the comment's recommendations for consideration of policies with which concept site plans for Rezone Site No. 11 (Glen Annie) may be consistent with, please refer to Comment Responses I.98-1 and I.98-4.

Comment Response I.98-11

The comment asserts that the EIR improperly identifies potential adverse land use impacts associated with Rezone Site No. 11 (Glen Annie), particularly with regards to Policy III.A of the County's Comprehensive Plan Agricultural Element and Policy 3 of the County's Comprehensive Plan Land Use Element. Please refer to Comment Response I.98-5. Discussion and analysis of the potential for the proposed Project to conflict with applicable policies of the County's Comprehensive Plan in Section 3.10, *Land Use and Planning.* While the EIR provides a preliminary analysis of potential consistency or inconsistency with existing policies of the County's Comprehensive Plan, it should be noted that the preliminary determinations regarding the consistency of the proposed Project with these policies is presented for informational purposes to inform the CEQA analysis only. All final consistency determinations will be made by the Board of Supervisors during consideration of the proposed Project.

Comment Response I.98-12

The comment asserts that the EIR's analysis of potential quality of life impacts presented in Impact LU-3 mischaracterizes impacts associated with Rezone Site No. 11 (Glen Annie). Please refer to Comment Response I.98-1 and I.98-4.

Comment Response I.98-13

The comment asserts that the EIR fails to recognize that, based on the concept site plan, redevelopment of Rezone Site No. 11 (Glen Annie) is likely to entail development of over 100 acres of open space and public recreational amenities, including neighborhood, child-friendly parks, and dog parks on remaining parcels adjacent to Rezone Site No. 11 (Glen Annie) and which are not included in the sites inventory. Please refer to Comment Response I.98-4.

Comment Response I.98-14

The comment asserts that the EIR's analysis of wildfire impacts improperly characterizes associated with Rezone Site No. 11 (Glen Annie) as potentially significant and references information provided by the County Fire Department which asserts that Rezone Site No. 11 (Glen Annie) is well protected from wildfire hazards. Please refer to Comment Response I.98-7.

THE OAK CREEK CO.
Santa Barbara, California

February 9, 2024

Hannah Thomas
Santa Barbara County Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101
Via e mail:
HThomas@countyofsb.org
housingelement@countyofsb.org

Re: **Comments on Draft Housing Element Update Program EIR**

Dear Hannah and Planners:

Below are a few comments on the comprehensive draft Housing Element Update EIR that you have prepared.

- As to the description of Public Transportation MTD bus lines that serve the area, consider adding Bus Line 6 on page 3.14-11 on the list of bus lines that serve the community along Hollister and connecting destinations. I.99-1

- In the Table of Alternatives, the first listed alternative after the No Project Alternative is Alternative 2 – Sustainable Communities Strategy. This Alternative includes only those potential rezone sites with all or a portion of the site HQTC in the South Coast as mapped by SBCAG (and certain North County sites). Perhaps Alternative 2 should also parenthetically be referred to as Project A, as then Alternative 3 is referred to as a Reduced Project A. I.99-2

  Alternative 3 – "Reduced Project A" removes 6 additional South County sites and 3 North County sites. While the intent is to further reduce the site inventory by additional sites beyond those removed in Alternative 2, it would seemingly be clearer to state in Alternative 3 that it removes the following additional sites from the Potential Rezone Program in addition to those removed in Alternative 2. I.99-3

As described in the EIR, the water issues associated with development, particularly the Eastern Goleta Valley, are complex. Water meter availability from the Goleta Water District has been a driving element between what has remained undeveloped and what has been developed since the Goleta Water I.99-4

1114 State Street, Suite 214
Santa Barbara, CA 93101
(805)698-0795

Moratorium in 1972. Certain properties in the housing inventory have distinctly more favorable water rights and opportunities for meters pursuant to the 17 year lawsuit (1972 – 1989) and stipulated judgment in Wright v. Goleta Water District.

The Giorgi property, Potential Rezone Site 1, has preeminent rights under the Wright v. Goleta Water District suit, and thus has an opportunity to provide housing sooner than other sites that would be subject to the limited water meters available from the Goleta Water District under its mandated rules and regulations. Our company is the developer of the Giorgi site in association with the long-term family owners of the property, and I was one of the attorneys in the Wright v. Goleta Water District suit.

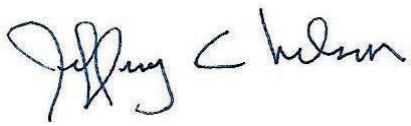
I.99-4 Cont.

The EIR would not be expected to go in to a deeper analysis of what each housing site's opportunities are for water meters in the near term, so this is more a comment about how development opportunities are likely to play out rather than a comment on the adequacy of the EIR.

I agree that the reduced Project A Alternative is the environmentally superior alternative. This retains as a housing rezone site the Giorgi Property, which is located on the Hollister High Quality Transportation Corridor.

Thank you for the opportunity to provide this input.

Sincerely,



Jeffrey C. Nelson

Comment Letter I.99 – [Jeffrey C. Nelson, The Oak Creek Company]

Comment Response I.99-1

The comment requests that discussion in Section 3.14, *Transportation* be modified to include Bus Line 6 to the list of bus lines serving the community along Hollister Avenue and connecting destinations.

These suggested revisions have been incorporated into the Final EIR in Section 3.14.2.1, *Countywide Transportation Network*.

Comment Response I.99-2

The comment recommends a change to the name of Alternative 2 – Sustainable Communities Strategy to "Project A" as it includes only the potential rezone sites that are located within the High Quality Transit Corridor (HQTC) in the South Coast as mapped by SBCAG (and certain North County sites). However, as described in Section 4.5.2, *Alternative 2 – Sustainable Communities Strategy*, this alternative would not reduce the number of housing units or the commercial development as compared to the proposed Project. To make up for the difference and accommodate the RHNA plus the 15 percent buffer, the loss in housing capacity associated with the eliminated potential rezone sites would be reallocated and balanced within the South Coast and the Santa Maria Valley Housing Market Areas, which are the most VMT-efficient regions in the unincorporated areas of the county; therefore, the title of this alternative is accurate

Comment Response I.99-3

The comment recommends an edit to the discussion under Alternative 3 – Reduced Project A Alternative to clarify the sites eliminated from consideration under this alternative are in addition to sites removed from Alternative 2 – Sustainable Communities Strategy. Please refer to Comment Response I.99-2. The commenter incorrectly identifies that sites removed under Reduced Project A are in addition to sites removed under Alternative 2 – Sustainable Communities Strategy. The Sustainable Communities Strategy Alternative would revise the list of potential rezone sites to include only those sites within or proximate to the Hollister Avenue HQTC in the South Coast and sites within the Santa Maria Valley; however, this alternative would reallocate the proposed residential and commercial development units and square footage such that it would be identical to that described for the proposed Project (i.e., a worst case scenario analysis of Project development). In contrast, the Reduced Project A, B, and C Alternatives would eliminate sites and reduce the overall number of dwelling units and commercial square footage while meeting the County's state-mandated RHNA plus the 15 percent buffer as compared to the proposed Project.

Comment Response I.99-4

The comment provides background on water rights issues within the Eastern Goleta Valley and the existing preeminent water rights given to Rezone Site No. 1 (Giorgi) under the Wright v. Goleta Water District suit. The comment further expresses support for Alternative 3 – Reduced Project A Alternative and the identification of this alternative as the Environmentally Superior Alternative. These comments have been noted and will be forwarded to decision-makers for future consideration.

Alamilla, Breanna

From: Karen <danandkaren3@gmail.com>
Sent: Friday, February 9, 2024 4:57 PM
To: PAD LRP Housing Element
Subject: Fwd: Comment Re: 2023-2031 Housing Element Update Draft EIR

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Resent. Hopefully more readable

---------- Forwarded message ---------
Date: Fri, Feb 9, 2024 at 4:51 PM
Subject: Comment Re: 2023-2031 Housing Element Update Draft EIR
To: <housingelement@countyofsb.org>

Dear Ms. Thomas,

I.100-1

We have reviewed the 2023-2031 HE Update Draft EIR and offer the following comments:
We support Alternative 2 – *Sustainable Communities* Strategy
for the following reasons:

Glen Annie (Site No. 11) is:
1: Prime agricultural zoned land operating under a conditional use permit.
2: Within the borders of 2 watershed and sensitive creek habitats: Tecolotito Creek and El Encanto Creek
3: Is NOT located in a Transit Priority Areas (TPAs) and/or High Quality Transit Corridors (HQTCs) Transit Priority Area
4: Development will exacerbate congestion at the Storke/Glen Annie/101/Calle Real intersection, Glen Annie/Cathedral Oaks and Storke/Hollister Avenue. All of these locations are severely overburdened by traffic to/from the major retail centers south of 101 and Dos Pueblos High School on the north side.
5: This site is OUTSIDE the rural/urban boundary and its location does NOT fulfill the stated goal of promoting housing development on infill sites.

The choice is obvious. It's right there in the title:

The *Sustainable Communities* Strategy

Thank you for the opportunity to comment.

Sincerely,

Mr. & Ms. Earl D. Lovelace
Goleta

Comment Letter I.100 – [Earl D. Lawrence]

Comment Response I.100-1

The comment expresses support for selection of Alternative 2 – Sustainable Communities Strategy and opposition to the selection and development of Rezone Site No. 11 (Glen Annie), due to potential impacts to agricultural resources, water quality and aquatic habitats, transportation and congestion issues. Please refer to Master Response 2.

Hannah Thomas
123 E Anapamu St
Santa Barbara, Ca 93101

February 9, 2024

Dear Hannah,

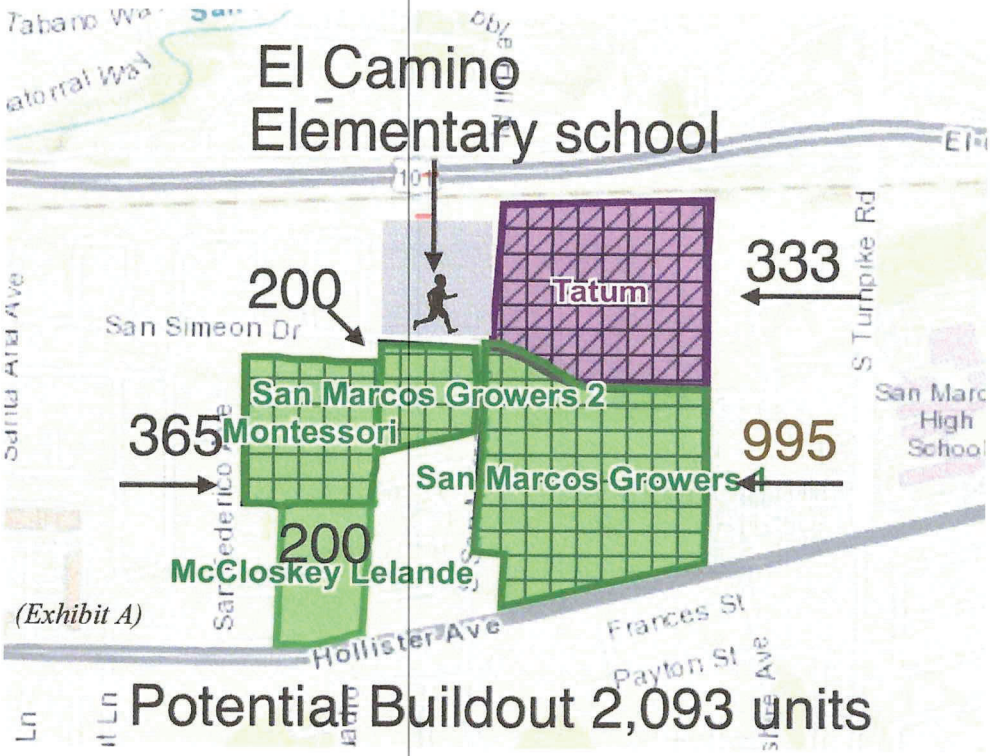
The Programatic Environmental Impact Report (PEIR) for the 6th Cycle Housing Element Update (HEU) lists "significant and unavoidable" impacts from proposed rezoning of parcels to accommodate high density housing. Impacts to the environment, public safety, wildfire, noise, air quality, agricultural resources, biological resources, cultural resources and riparian corridors could be partially mitigated if future development was distributed in a more equitable manner throughout the South Coast. Proposed rezoning of parcels in the HEU and supporting PEIR are inconsistent with programs and policies of the Eastern Goleta Valley Community Plan (EGVCP), Airport Land Use Compatibility Plan (ALUCP) and the Santa Barbara County Comprehensive plan. Second District Supervisor Laura Capps and Second District Planning Commissioner Laura Bridley both voted against adoption of the 6th Cycle HEU due to significant impacts project programs could have on their district. I.101-1

Conversion of urban agricultural parcels in the the Eastern Goleta Valley could result in thousands of new housing units concentrated within a small geographic area. Cumulative impacts from concurrent or subsequent construction of high density multifamily projects will have significant impacts on the surrounding area for years. Actions on construction sites are a critical factor contributing to poor air quality and noise impacts. Most mitigation measures outlined in the PEIR related to construction sites are unrealistic and unenforceable. While limiting construction hours does end constant noise from running engines, beeping from tractors in reverse and workers shouting all day, it does nothing to control fugitive dust every time the wind blows after 5pm and neither does a designated "dust monitor". Listed below are some of the development projects and mitigation measures proposed in the PEIR.

Tatum, San Marcos Growers 1, San Marcos Growers 2 and Montessori. These projects will convert agriculturally zoned land and vacant open space parcels to allow for high density housing. All four projects are adjacent to El Camino Elementary School and low density residential development (*Exhibit A)* Impacts from construction related activities such as fugitive dust, traffic, noise, vibration and diesel exhaust would disrupt the daily activities, quality of life and education of over 300 children attending elementary school. Cumulative impacts from multiple high density development projects will affect this neighborhood for years. The Program EIR includes the following mitigation measures to reduce impacts from multifamily development projects. These measures are ineffective when applied to projects adjacent to sensitive receptors or concurrent development of multiple sites I.101-2

MM NOI-1 (Construction Hours) ***Construction hours coincide with school hours and school related traffic patterns***

MM NOI-2 (Noise Study and Site-based Attenuation)
MM T-1 (Site-based TDM) would apply. MM T-2 (Construction Traffic and Access Management Plan)



(Exhibit A)

San Marcos Growers #1 184 feet from El Camino Elementary
San Marcos # 2 is 75 feet away and shares 489 feet of street frontage with El Camino elementary
Tatum 0 feet away and shares 654 foot fence line with El Camino Elementary School.
Montessori site 183 feet from El Camino Elementary School
Total= 1800 proposed Builders Remedy units

I.101-2 Cont.

(Exhibit A)

I.101-3

St. Vincent's East is located adjacent to the wildfire-prone areas of the San Marcos Foothills. It is bordered by HWY 154 on the west, an SCE substation to the South, San Marcos Foothills Preserve to the North and low density housing to the East. High density housing on this site would expose vulnerable residents to some of the highest-risk areas of the county to the threat of uncontrollable spread of wildfire. Santa Barbara County's Climate Change Vulnerability Assessment considers lower income renters as vulnerable populations at risk from impacts of climate change. This population has the most difficulty recovering from disasters. The potential of 100 very low income units resulting from proposed rezoning of St Vincents East, places a vulnerable population in a designated High Fire Hazard area with historical fire activity including Paint 1990, Jesusita 2009, Cave 2019.

I.101-4

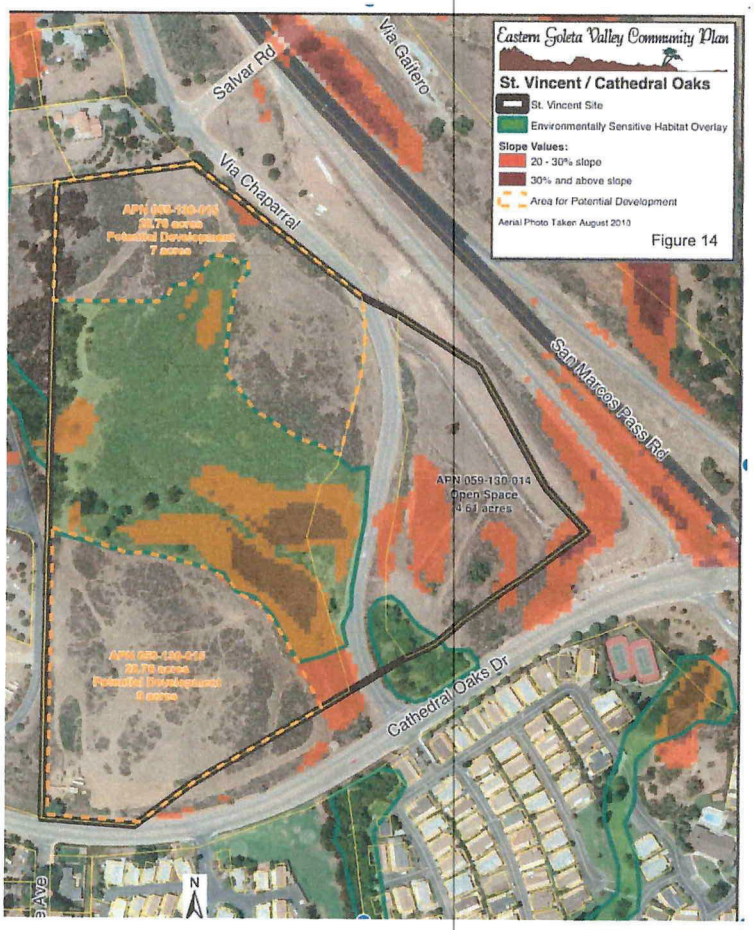
St Vincents East & West High density development on these sites would be inconsistent with a Sustainable Community Strategy. There is no access to high quality transit, services or sidewalks. Both parcels are adjacent to HWY 154 and SR 192, highly traveled roads with speed limits of 55mph and 45mph respectively. St Vincents West is bordered

I.101-4 Cont.

on the North East by an emergency fill site used by the county to dump debris including from the Montecito debris flow of 2018. The fill has created an artificial hill which partially screens a storage area for construction materials.

I.101-5

Additional constraints include Environmentally Sensitive Habitat, Riparian Corridors, FEMA Flood zone and The Atascadero Greenway. Environmental constraints have been analyzed and well documented in the Eastern Goleta Valley Community Plan and the accompanying Environmentally Sensitive Habitat/Riparian Corridor Overlay Zones *(exhibit B)*In a recent project sponsored by the Environmental Defense Center titled, **Goleta Watersheds and Wildland-Urban Interfaces: Enhancing Fire Safety and Riparian Forest Health outlines the importance of preservation and restoration of St Vincents East.** *(Exhibit C)*



(Exhibit B)



Figure 365. The yellow outline depicts the land that should be acquired for coastal sage scrub, oak woodland, and riparian forest restoration, to avoid future development and reduce long-term fire hazards in the WUI, and to create a public park or open space complimenting the nearby San Marcos Foothills Preserve located north of the site. Google Earth. 2019.

(Exhibit C)

I.101-6

The PEIR states:

"Even with required mitigation, the proposed Project would continue to result in significant impacts by exposing potential residential development enabled under the Housing Element Update within wildfire-prone hazard areas. The only way to fully avoid the wildfire impacts resulting from the proposed Project would be to eliminate sites within the High and Very High FHSZ and WUI area. However, doing so would substantially reduce flexibility or eliminate the ability of County decision-makers to meet regional housing needs and specific affordability targets. Therefore, impacts would remain significant and unavoidable"



(Exhibit D)

The HEU is proposing to place hundreds of units of low income housing on parcels in a High Fire Hazard Zone to help satisfy the County's Regional Housing Needs allocation of low income housing. These parcels have historical fire activity having had 3 major fires in 30 years (*exhibit D,E,F)* These parcels are not near services or transportation. These parcels are adjacent to a busy state highway, a busy state route, an SCE power substation and a county emergency landslide dump site. Proposing housing on St Vincent's East & West is not Affirmatively Furthering Fair Housing. These parcels do not qualify for CEQA streamlining.



SANTA BARBARA NEWS-PRESS

CAVE FIRE

'HERE WE GO AGAIN'

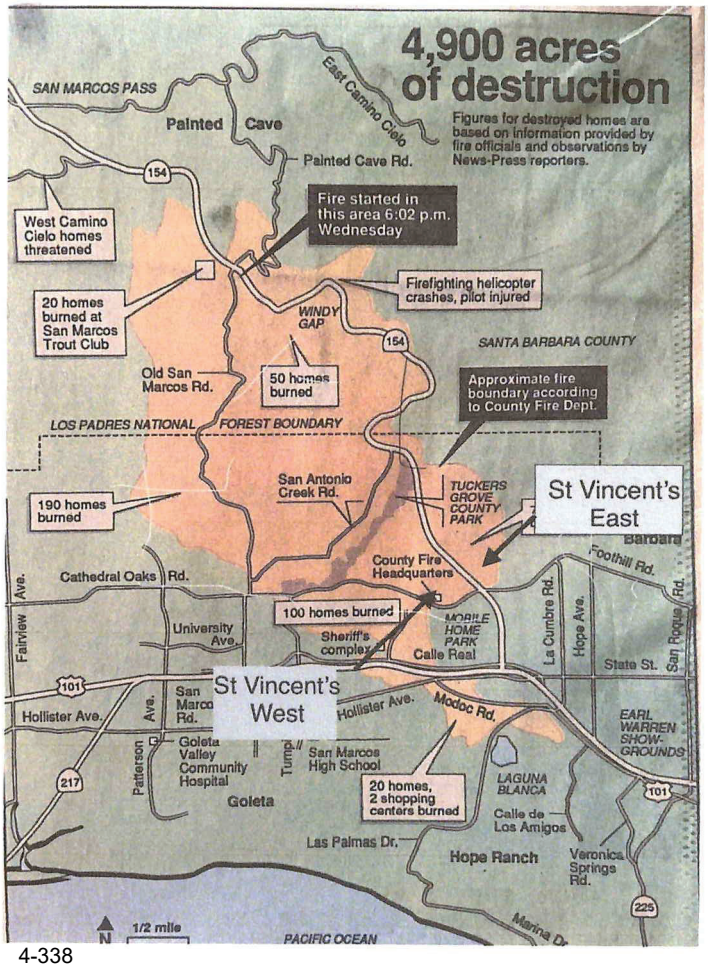
THOUSANDS EVACUATED AS MORE THAN 3,100 ACRES HAVE BURNED

BLAZE IS AT ZERO PERCENT CONTAINMENT AS HIGH WINDS AID FLAMES IN JUMPING STATE ROUTE 154

Cave Fire gives evacuees flashbacks of the 1990 Painted Cave Fire

(Exhibit E)

(Exhibit F)



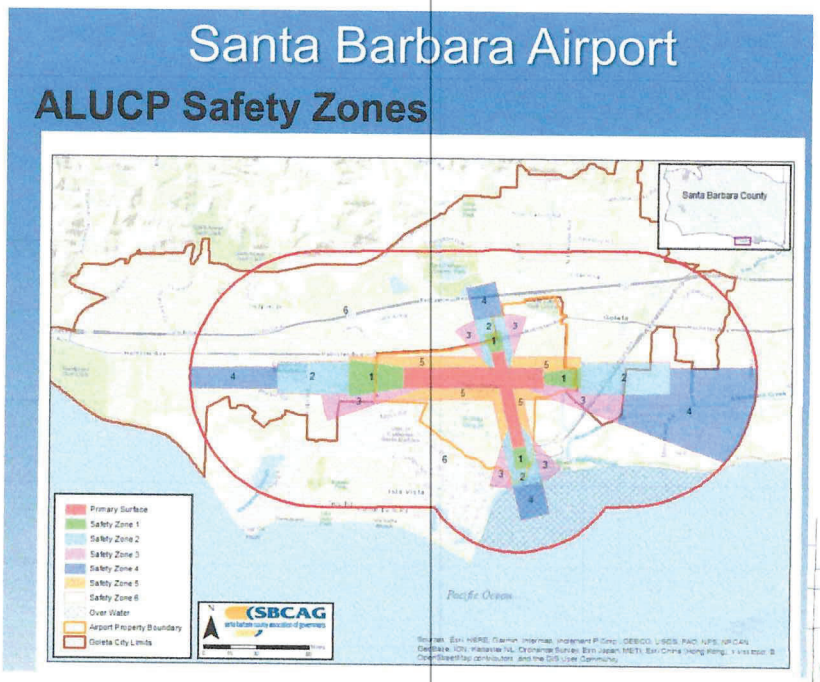
I.101-7

Giorgi proposed rezone #25 is productive agricultural land with designated prime soils. This parcel is bordered by industrial uses, a regional airport and adjacent agricultural lands. High density mixed use development of this land would be incompatible with the surrounding area. Nearly half of the parcel is within Airport Safety Zone 2 which severely limits residential densities and increases risk of noise impacts and conflicts with future residents(*Exhibits G,H,I)* According to CalEnviro Screen the census block containing all South Patterson Urban Agriculture parcels is a designated Disadvantaged Community due to high concentration of pollutants.

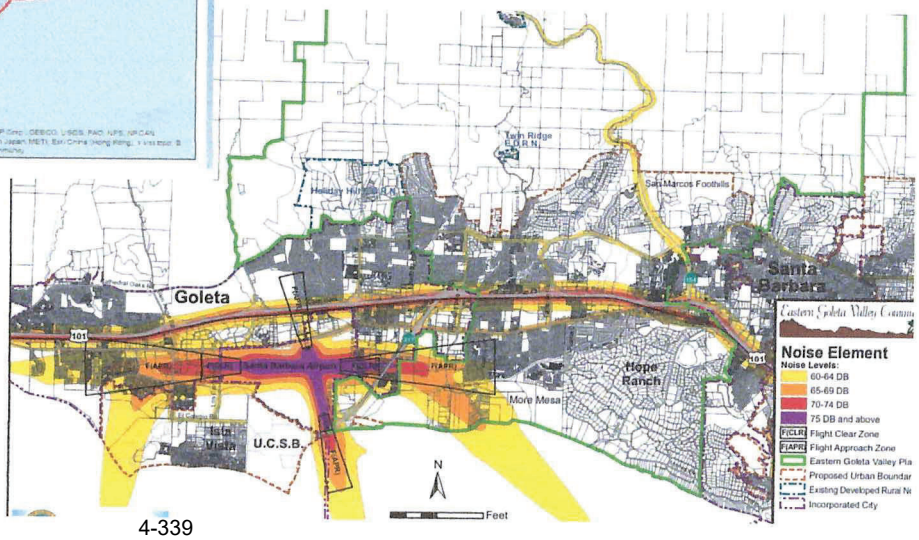
I.101-8

In 2006 community members along with county staff were tasked with creating a vision for the future of the Eastern Goleta Valley. Eight years later after 41 public meetings and seven planning commission hearings, The Eastern Goleta Valley Community Plan was approved. Thousands of hours and much debate went into the plan. It appears all of that work was for nothing. The recommended Reduced Project A in the PEIR reflects poor planning, developer led decisions and a complete disregard for EGV residents. The public process was inadequate throughout the development of the HEU. County residents deserve to hear the truth from our planning director.

Sincerely,
Kendra Duncan O'Connor
Unincorporated Santa Barbara County



(Exhibit G)



(Exhibit H)

Comment Letter I.101 – [Kendra Duncan O'Connor]

Comment Response I.101-1

The comment notes the potentially significant and unavoidable environmental impacts identified in the EIR that could result from the proposed rezoning of parcels to accommodate high-density housing, including but not limited to impacts on air quality and noise. The comment broadly states that the level of significance could be partially mitigated if future development was distributed more equitably across the South Coast. These comments have been noted and will be forwarded to County decision-makers for their consideration.

The commenter also contends that the proposed rezoning of parcels is inconsistent with policies in the Eastern Goleta Valley Community Plan, County Comprehensive Plan, and ALUCP. Please refer to Master Response 2. As discussed therein, impacts associated with potential land use conflicts and plan and policy consistency are analyzed in Section 3.10, *Land Use and Planning.* Specifically, consistency with policies of the Eastern Goleta Valley Community Plan, County Comprehensive Plan, and ALUCP is analyzed in Impact LU-2, which concludes that due to potential inconsistencies with these plans and absence of feasible mitigation, impacts would be potentially significant and unavoidable.

The comment also states the conversion of urban agricultural parcels in the Eastern Goleta Valley could result in thousands of new housing units in a small geographic area, which would have cumulative impacts from concurrent or subsequent projects. Please refer to Section 3.2.4.3, *Cumulative Impacts,* which provides analysis of potential cumulatively significant impacts to agricultural resources and finds these cumulative impacts would be significant and unavoidable.

The comment further broadly states that mitigation measures presented in the EIR related to construction sites are unrealistic and unenforceable and that limiting construction hours would not address impacts from fugitive dust emissions after 5:00 p.m. nor could a dust monitor. However, the comment does not provide any direct support for its assertions that mitigation measures identified in this EIR are unrealistic and unenforceable. Section 3.2, *Air Quality,* concludes that the construction activities associated with discretionary and non-discretionary actions are considered to result in potentially significant impacts from short-term PM_{10} emissions and result in conflicts or noncompliance with Santa Barbara County Air Pollution Control District (SBCAPCD) regulations and standards for fugitive dust emissions and visible dust. To mitigate impacts, the EIR requires **MM AQ-1 (PM_{10} and Dust Control)** and **MM AQ-2 (Exhaust Emissions)** which are derived from guidance from SBCAPCD for mitigating short-term PM_{10} emissions and fugitive dust impacts, as well as requirements of the County Grading Code. Implementation of these measures would require that applicants for future multifamily housing projects minimize short-term construction PM_{10} and fugitive dust emissions by implementing a variety of measures, including frequent water of exposed soils, suppression of dust, limiting vehicle speeds on unpaved roads, installation of track out prevention devices, scheduling of earthwork activities during periods of low wind speed, and designation of persons to monitor and document dust control requirements. These mitigation measures which include limitations on construction hours and requirements for dust monitors represent industry and agency-approved best management practices that have been proven realistic, enforceable, and effective in reducing PM_{10} and fugitive dust emissions.

Comment Response I.101-2

The comment states that impacts will result from the future residential development of housing on sites located adjacent to the El Camino Elementary School (i.e., Tatum, San Marcos Growers 1 and 2, and Montessori), including impacts from construction air pollutant emissions, traffic, noise, and vibration. Without providing further evidence of the fact, the comment states that mitigation measures **(MM NOI-1, MM NOI-2, MM T-1**, and **MM T-2)** identified in the EIR would be ineffective at reducing impacts to sensitive receptors or impacts resulting from concurrent development of multiple sites. The commenter also asserts that construction hours would coincide with school hours and school-related traffic patterns.

The EIR includes a detailed discussion and programmatic analysis of potential impacts associated with the rezoning and development of housing under the proposed Project, including a detailed analysis of impacts and mitigation measures associated with development near sensitive receptors. Detailed discussion of these impacts is presented in Section 3.3, *Air Quality,* Section 3.11, *Noise,* and Section 3.14, *Transportation.* For instance, detailed discussion and analysis of potential air quality impacts on nearby sensitive receptors is provided in Impact AQ-3 in Section 3.3, *Air Quality.* As presented therein, given the proximity of several identified housing sites to existing sensitive receptors such as the El Camino Elementary School, the construction of individual development projects may generate PM_{10} and/or fugitive dust emissions that adversely affect nearby sensitive receptors. To mitigate these potentially significant impacts, the EIR identifies **MM AQ-1** and **MM AQ-2** which would require that construction activities associated with all future development projects permitted under the Housing Element Update implement measures to control PM_{10}, fugitive dust, and equipment exhaust emissions generated during all stages of site construction. Implementation of **MM AQ-1** and **MM AQ-2** would ensure that future construction projects enabled under the proposed Project would not generate PM_{10} emissions that would generate or contribute to substantial PM_{10} or fugitive dust emissions adversely affecting nearby sensitive receptors, or violate existing SBCAPCD rules, including SBCAPCD nuisance rules. Relevant discussion in Section 3.3, *Air Quality,* has been revised to include mention of the El Camino Elementary School as an example of a sensitive receptor potentially affected by the proposed Project.

In the case of construction-related noise impacts, Impact NOI-1 points to potentially significant impacts on the El Camino Elementary School from adjacent site development and concurrent construction activities as an example of the range of potential impacts that might result from implementation of the Project. **MM NOI-2 (Noise Study and Site-based Attenuation**) requires applicants for multi-family housing projects to include a site-specific noise study that documents the existing noise conditions on site and recommends attenuation strategies and techniques to address sensitive receptors and achieve acceptable noise levels under County standards. Therefore, noise-related impacts to sensitive receptors are accurately described in the EIR as significant but mitigable. Consistent with state law, the EIR identifies feasible mitigation measures informed by guidance from local agencies or existing regulations, and that have been proven realistic, enforceable, and effective in reducing such impacts.

Comment Response I.101-3

The comment notes that Rezone Site No. 12 (St. Vincent's – East) is located adjacent to wildfire-prone areas of the San Marcos Foothills, and the development of high-density housing on this site would present significant risks to wildfire.

The EIR acknowledges and thoroughly describes in Impact WF-2 that the proposed Project would potentially exacerbate wildfire risks and could expose residents to the threat of uncontrollable spread of wildfire. Impact WF-2 specifically lists Saint Vincent's- East as located in the Wildland Urban Influence area and includes heavily vegetated natural habitats providing a direct fire transmission corridor to the site. The EIR asserts a significant and unavoidable impact for Impact WF-2; therefore, the EIR accurately describes wildfire risk at Saint Vincent's -East.

Comment Response I.101-4

The comment states that the development of Rezone Site No. 12 (St. Vincent's – East) and No. 13 (St. Vincent's – West) would be inconsistent with the Connected 2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), due to the lack of access to high quality transit, services or sidewalks, and adjacency of the sites to Highway 154 and SR 192, which are both high volume, higher speed highways.

Detailed discussion of consistency with the Sustainable Communities Strategy is presented in Section 3.14, *Transportation.* As discussed therein, while individual housing sites might appear inconsistent with goals and policies, the Housing Element Update as a whole would support these goals for promoting residential and mixed use development to help address the overall housing needs as well as the unique housing needs of specific communities or regions within the county. The various programs proposed as part of the Housing Element Update also demonstrate the consistency of the proposed Project with land use planning goals and policies set forth in the Connected 2050 RTP/SCS. For instance, the programs described in the discussion of *Housing Goals, Policies, and Programs* of Section 2.3.2, *Project Components,* would serve to facilitate or encourage the development of housing which would serve to help alleviate local housing needs and improve the balance of jobs and housing throughout the county. As identified in the Housing Element Update, planning housing in existing urban areas and near job centers reduces VMT and commuting in the county and aligns land use with the sustainable communities priorities put forth in the Connection 2050 RTP/SCS and SB 375. Please refer to the analysis presented in Impact T-1 for detailed discussion of the Project's consistency with goals and policies of the Connected 2050 RTP/SCS.

With regards to comments about use of areas adjacent to Rezone Site No. 13 (St. Vincent's – West) for storage or artificial fill materials which partially screens storage areas for construction materials, these comments have been noted and will be forwarded to County decision makers for their consideration.

Comment Response I.101-5

The comment states that additional constraints, such as Environmentally Sensitive Habitat (ESH), riparian corridors, flood zones, and the Atascadero Greenway are documented in the Eastern Goleta Valley Community Plan and a recent project sponsored by the Environmental Defense Center that would constrain sites identified in the sites inventory.

Within each relevant section, the EIR presents a detailed discussion of existing environmental conditions, constraints, and regulations applicable to housing sites and future development enabled by the proposed Project on available long-range planning documents and agency resource mapping, available EIRs, and related technical studies. This programmatic analysis is supported by the review of existing adopted plans, public databases, and recent studies, that identify such resources. For instance, in Section 3.4, *Biological Resources* and Section 3.9, *Hydrology and Water Quality,* the EIR clearly describes and cites examples of sites that are subject to constraints, such as ESH and flood

zones, including in the Eastern Goleta Valley. Where constraints affecting a site or impacts associated with such constraints are identified, the EIR presents a detailed discussion of existing policies and regulations that would serve to ensure impacts are reduced, either through modification of development plans, or modifications of a site to eliminate/accommodate constraints to development. Where existing regulations would be inadequate in addressing impacts, the EIR identifies all feasible mitigation measures which would be applicable in reducing impacts.

Comment Response I.101-6

The comment expresses concerns regarding the rezoning and development of parcels within high fire hazard severity areas, within the WUI, in areas not served by existing services or transit, in areas adjacent to busy highways, The comment further states that proposing housing on Rezone Site No. 12 (St. Vincent's – East) and No. 13 (St. Vincent's – West) does not Affirmatively Further Fair Housing or quality for CEQA streamlining.

These comments have been noted and will be forwarded to County decision-makers for their consideration.

Comment Response I.101-7

The comment asserts that Rezone Site No. 1 (Giorgi) would be inappropriate for rezoning and housing development due to impacts associated with site development and potential policy inconsistencies relating to conversion of agricultural lands, loss of prime soils, land use incompatibility, airport safety hazards, airport noise impacts, airport-related conflicts with future residents, and existing high concentrations of pollutants.

Please refer to Master Response 3.

Comment Response I.101-8

The comment expresses opposition to Alternative 3 – Reduced Project A Alternative and asserts that the EIR reflects poor planning and disregard for residents of Eastern Goleta Valley.

Please refer to Master Responses 1 and 3.

Hunt & Associates
Biological Consulting Services

Hannah Thomas
Planning & Development Department
123 East Anapamu Street
Santa Barbara, California 93101

7 February 2024

Delivered via email to: housingelement@countyofsb.org

Subject: Comments on Draft Housing Element Program EIR re: Glen Annie Golf Course as Potential Rezone Site for Residential Development.

Ms. Thomas,

I have owned a home in Goleta since 1990 and as a consulting biologist, I know this area very well. I wish to comment on the County's Draft Housing Element Program EIR, specifically the selection of Glen Annie Golf Course (GAGC) as a potential receiver site to absorb up to 1,000 State-mandated housing units. While I understand the necessity of all communities in the County to share the burden of mandated housing, the consequences of developing particular sites will be wildly variant. The GAGC property is in a class by itself.

Not only is the GAGC parcel one of the largest properties evaluated in the Housing Element, even a cursory look at the map of candidate sites in the Goleta area shows that the parcel stands out from other proposed rezone sites as the only one north of Cathedral Oaks Road and unique in being surrounded on three sides by extensive open space. What is not so evident is that this property is also unique in that it supports a breeding population of a federally-listed amphibian, the California red-legged frog (*Rana draytonii*), and provides foraging and possibly nesting habitat for a California Fully Protected bird, the white-tailed kite (*Elanus leucurus*). Setting aside the argument that a golf course should never have been constructed on the parcel in the first place, re-zoning the parcel to allow residential development will have manifold significant impacts in other areas, including Transportation, Public Safety, Water Use, Agriculture, and Aesthetics, in addition to Biology. I.102-1

Rezoning the GAGC property from AG-II-40 to DR 5 and DR 20/30 will require significant 'improvements' to Glen Annie Road and Cathedral Oaks Road to handle significantly more automobile, heavy truck, and pedestrian traffic. I drive Cathedral Oaks Road every day and have witnessed an exponential increase in traffic since 2005. Just in the past three years there have been four traffic fatalities on Cathedral Oaks Road in the vicinity of GAGC. I.102-2

Planners and community leaders have a short memory when it comes to drought. Just a few years ago, only the restriction on issuing new water meters necessitated by a multi-year drought kept the City of Goleta and County from allowing agricultural parcels north of Cathedral Oaks I.102-3

5290 Overpass Road, Suite 108
Santa Barbara, California 93111
Office: (805) 967-8512 Cell: (805) 689-7423
Email: anniella@verizon.net

Road from being rezoned for development (e.g., the Shelby parcel in the City of Goleta). Despite the transitory surplus now, where will the water come from to serve 1,000 new households on GAGC, when we are in the next drought cycle, or even 300?

I.102-3 Cont.

The agricultural heritage of the Goleta Valley is rapidly disappearing under a recent onslaught of large-scale residential development projects, e.g., Haskell's Landing, Comstock Homes, The Village at Los Carneros, Heritage Ridge, etc. One only needs to sit at the red light on the Glen Annie/Storke Road-Highway 101 overpass facing north to admire the mixture of open space, orchards, and pasture against the sweeping backdrop of the Santa Ynez Mountains to appreciate why Goleta is called 'The Good Land'.

I urge the County to maintain the urban-rural boundary on development in the Goleta area at Cathedral Oaks Road. Instead, focus densification in areas of existing developed. Rezoning the GAGC site for residential development will set a precedent that will significantly impact biological, hydrological, transportation, and visual resources, and significantly change the character of Goleta forever. Thank you for your time and consideration.

I.102-4

Sincerely,

Lawrence E. Hunt

Lawrence E. Hunt

cc: City of Goleta: Paula Perotte – pperotte@cityofgoleta.org
Luz Reyes-Martin – lreyes@cityofgoleta.org
Stuart Kasdin – skasdin@cityofgoleta.org
James Kyriaco – jkyriaco@cityofgoleta.org
Kyle Richards – krichards@cityofgoleta.org
The Goodland Coalition: thegoodlandcoalition@cox.net
Environmental Defense Center: btrautwein@EnvironmentalDefenseCenter.org

Comment Letter I.102 – [Lawrence E. Hunt, Hunt & Associates Biological Consulting Services]

Comment Response I.102-1

The comment expresses opposition to selection and development of Rezone Site No. 11 (Glen Annie), due to the site being one of the largest properties evaluated, the site being the only proposed rezone north of Cathedral Oaks Road, and potential for significant impacts to biological resources, particularly due to the site supporting habitat for the federally listed California red-legged frog (*Rana draytonii*) and the California-protected white-tailed kite (*Elanus leucurus*).

The EIR acknowledges that several sites included in the sites inventory are known to potentially support federally designated critical habitat for the California red-legged frog and white-tailed kite foraging habitat (refer to discussion in Section 3.4.2.1, *Existing Biological Resources*). The EIR also acknowledges and analyzes potential impacts to habitat supporting numerous other special-status species, key examples of which are referenced throughout the discussion in Section 3.4, *Biological Resources,* while a more complete list of potential special-status species present within the Project area are presented in Appendix E of the EIR. However, as described in Section 1.3, *Program-Level EIR Analysis* and various other locations, the EIR analysis presents a programmatic analysis of potential impacts associated with the implementation of a land use plan, and the impacts associated with potential future development of sites that may or may not be selected for development of new residential and commercial issues. As such, a site-specific discussion of existing physical conditions present for the Glen Annie Golf Course is not presented, nor warranted. With regard to comments concerning Rezone Site No. 11 (Glen Annie) being one of the largest and only sites considered north of Cathedral Oaks Road, these comments have been noted and will be forwarded to County decision makers for their consideration.

Comment Response I.102-2

The comment states that rezoning Rezone Site No. 11 (Glen Annie) would require significant improvements to surrounding roadways, including Glen Annie Road and Cathedral Oaks Road to ensure adequate access and capacity for new traffic generated by the development of the site.

Discussion of impacts to transportation, including discussion of existing conditions for select roadways, existing County policies related to transportation planning and roadway design, and impacts resulting from increases in Project-related vehicle trips, is provided in discussion of Impact T-3 in Section 3.14, *Transportation* (see also Table 3.14-11). As described therein, based on the sites inventory prepared for the Housing Element Update, new average daily trips (ADTs) expected as a result of the proposed Project would not be evenly distributed; rather, clusters of development would occur within existing communities and would concentrate on existing roadways serving those communities. The increased traffic on these affected roadways could be substantial and could exceed the County's policy and/or design capacities for existing roadways and intersections adopted in the Circulation Element, which would be inconsistent with the policies of the Circulation Element. To address future residential and mixed use development project consistency with the Circulation Element, the County's existing planning process requires applicants to improve roadways and intersections directly serving the project. These improvements commonly take the form of sidewalk and bicycle lane improvements, additional travel and turning lanes, intersection signalization and timing changes, pedestrian crossing, street lighting, and signage. Combined with the payment of Transportation Impact Mitigation Fees under County Code Chapter 23C, which contribute fair-share

funding to offsite transportation improvements needed to serve regional growth, the County can ensure that individual residential and mixed use development projects occurring as implementation of the Housing Element Update are each consistent with the Circulation Element's policies to be adequately served by multi-modal transportation facilities on a site-by-site basis. Therefore, due to compliance with these existing requirements and regulations, along with required implementation of **MM T-2 (Construction Traffic and Access Management Plan)** and **MM T-3 (Funding and Mitigation Fee Programs Update)**, impacts to transportation safety (Impact T-3) are considered significant but mitigable.

Comment Response I.102-3

The comment expresses concerns regarding the availability of long-term water supplies to serve the potential development of Rezone Site No. 11 (Glen Annie). The commenter emphasizes the importance of considering water supply restrictions under likely future drought conditions.

Detailed discussion of potential impacts to water supply are described in Section 3.15, *Utilities and Water Supply.* As discussed in Impact UWS-2, increased demand for municipal water supply would exceed the current water supply. Implementation of Program 14, *Water and Sewer Services,* of the Housing Element Update would help to reduce the potential for future development to exceed Goleta Water District's available water supplies by supporting the expansion of water services as needed to adequately serve potential housing sites, including selected rezone sites, and supporting changes to Goleta Water District's policies, including allowing the conversion of agricultural water to residential water for affordable housing projects and allowing the transfer of water credits between properties. However, Program 14 does not guarantee that water supplies would be available to serve the maximum buildout potentially enabled under the Housing Element Update. To address impacts to water supply, the EIR identifies **MM UWS-1 (Infrastructure, Services, Utilities, and Related Facilities)**, which would require applicants to secure water supplies and adequate infrastructure. However, as described above, even with the implementation of this mitigation, future housing projects may not be able to secure services depending on timing and water conditions. The only way to fully avoid impacts associated with the development of housing under the Housing Element Update and the availability of reliable water supplies from local water purveyors would be to eliminate sites from consideration as part of the proposed Project, particularly sites identified within the service areas of the Goleta Water District and Cuyama Community Service District, thereby eliminating potential housing sites. Doing so would substantially reduce the flexibility for County decision-makers to meet regional housing needs and specific affordability targets, and such mitigation is considered infeasible. Therefore, impacts are correctly characterized as *significant and unavoidable.*

Comment Response I.102-4

The comment expresses general concern selection and development of Rezone Site No. 11 (Glen Annie).

Please refer to Master Response 2.

Alamilla, Breanna

From: Lenette Pike <lenettepike@yahoo.com>
Sent: Friday, February 9, 2024 8:21 AM
To: PAD LRP Housing Element
Subject: No for Development behind Casitas Village

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I want to submit a no vote for the proposed residential project by Red Tail Development off Bailard Ave., north of the Casitas Village residential area.

Such a project, if approved will have a significant and negative effect to the quality of life for the neighborhood. It has been the case for many years now that when the freeway is widened and improved, it becomes a signal to developers that it is time to create traffic jams by bringing more homes and increasing the population.

I.103-1

The proposed project is too tall and too dense for the neighborhood. It will significantly block the beautiful views of our beloved mountains. Also there is the problem of parking which is already limited.

Please do not allow this to happen

Sincerely,

Lenette Pike

Comment Letter I.103 – [Lennette Pike]

Comment Response I.103-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to the potential for impacts to quality of life, particularly impacts to traffic/congestion, parking, and aesthetics. Potential impacts related quality of life are discussed in Section 3.10, *Land Use and Planning,* impacts to transportation are addressed in Section 3.14, *Transportation,* and potential impacts to scenic vistas are addressed in Section 3.1, *Aesthetics and Visual Resources*. Please also refer to Master Response 5.

SUZANNE ELLEDGE
PLANNING & PERMITTING
SERVICES, INC.

February 9, 2024

Ms. Hannah Thomas
County of Santa Barbara
Long Range Planning Division

Sent Via Email: housingelement@countyofsb.org

Subject: Housing Element Update, Public Comment Letter on Draft Program EIR;
Caird Family Properties (Caird 1, 2, & 3, and "Ekwill" Parcel);
Eastern Goleta Planning Area; 600, 620, & 905 South Patterson;
APNs: 065-090-031, 065-230-012, 071-190-036, & 071-140-048

Dear Ms. Thomas,

We appreciate the opportunity to comment on the County's Housing Element Update (HEU) Draft Program EIR (DPEIR). Our office is working with the Caird family on a housing development proposal for their properties located on South Patterson Avenue, identified as "Caird 1, 2, 3, and Ekwill" in the adopted HEU and the DPEIR. Our comments are focused on these properties and the DPEIR identified "environmentally superior alternative".

The adopted HEU and the "Project" as described in the DPEIR identifies the Caird family properties, totaling approximately 100-acres located on South Patterson Avenue (referenced above), for rezone from AG-I-10 to Design Residential; note that approximately 20-acres out of the 100-acres are located within the Coastal Zone and would remain AG-I-10. The majority of the property is developed with greenhouses sited on asphalt, concrete, and compacted dirt and is used for potted plant nursery operations. The Caird family has owned and operated these properties for nearly 50 years, and with three (3) generations involved in the potted plant nursery business, the family intends to continue their operations in the Goleta Valley area, as well as on property they own in the Santa Maria Valley. However, the high cost of farm labor, lack of affordable farmworker housing, and competition with outside markets have significantly impaired and impacted nursery operations, and the aging greenhouse infrastructure located on the South Patterson Avenue properties requires cost-prohibitive replacement and upgrades. I.104-1

The location of the Caird family properties in the heart of the urban center within easy walking distance to Goleta Valley Cottage Hospital, Jordano's, Google and other major employers is key to providing housing near employment and meeting the County's housing goals. The Caird properties are located alongside the Class I bikeway to UCSB, are adjacent to residential neighborhoods and services, all of which contribute to the properties' unique qualifications for residential development. The Caird family properties are also uniquely positioned with respect to water resources to serve new residential I.104-2

development. On April 24, 2023, the County of Santa Barbara Superior Court issued an order in *Martha H. Wright v. Goleta Water District* recognizing the Caird Family's right to extract up to 153.3 acre-feet per year from the Goleta Groundwater Basin. These adjudicated rights may be exchanged for residential water service from the Goleta Water District (GWD). These properties also have agricultural water credits. Based on these rights, the properties have public water supply that meets 100% of the water demand for the proposed residential development identified in the HEU and DPEIR. In fact, residential development of the properties is expected to reduce overall water use from historic baseline use, promoting sustainable management of regional water supplies.

In summary, the Caird properties have the following site characteristics/attributes:

- Public water supply from GWD that meets 100% project water demand;
- Located in urban center, within walking distance to some of the largest employers;
- Located in high transit area with bus service and Class I bikeway;
- Located near services, shopping, and schools;
- Located outside of high-fire and high-fire interface zones;
- Do not infringe on urban/rural boundary;
- Do not involve in-ground agriculture;
- Developed with antiquated greenhouses, asphalt surfaces, concrete pads; and
- Connected to public sewer with sufficient capacity to serve new homes.

These are factors that contribute to the Caird properties' suitability for residential development, and minimize potential impacts in several environmental issue areas including water supply, transportation, wildfire, greenhouse gas emissions, and land use compatibility.

I.104-2 Cont.

The DPEIR identifies Alternative 3 – Reduced Project A as the environmentally superior alternative, and cites that this alternative was selected because it "preserves urban agriculture to the maximum extent, substantially reduces potential impacts related to airport safety zones, and substantially reduces potential impacts related to airport noise" (DPEIR, ES-11). This alternative eliminates the Caird family properties and two other agriculturally zoned properties in the vicinity, including St. Athanasius Church, and the Scott property, which is used as a rock, masonry storage and landscaping yard, and not for agriculture.

Surprisingly, this alternative includes the Giorgi property, which is actively cultivating in-ground agriculture including lemons and avocados. Further, approximately half of the Giorgi property is located within Airport Safety Zone 2, which prohibits housing above 1 single-family dwelling per parcel, and is affected by airport noise. This alternative also includes the San Marcos Growers properties located in the urban area, zoned agriculture, and actively involved in nursery and row-crop vegetable farming. This alternative includes the Glen Annie Golf Course, zoned agriculture but located in the

I.104-3

designated Rural Area of the County, in the high-fire hazard area, outside of the urban core.

We question the DPEIR's selection of Alternative 3 – Reduced Project A as the environmentally superior project. The DPEIR states that this alternative was selected because it reduces impacts to urban agriculture, airport safety, and noise. However, this alternative includes several properties in the urban area zoned agriculture and presently utilized for in-ground agriculture on prime soils. The Giorgi property has nearly half of its land located in Airport Safety Zone 2, prohibiting residential development. The Glen Annie property is located in the designated Rural Area of the County and within the High Fire Hazard Area, which is typically not suitable for higher density residential development. The Caird family properties are better suited for residential development as they are not utilized for in-ground agriculture, are located in the urban core near major transit corridors and within walking distance to some of Goleta Valley's largest employers. The Caird properties also have existing water rights to support residential development.

I.104-3 Cont.

We therefore ask that the HEU DPEIR reconsider the project alternatives analysis and include the following factors in selection of the Environmentally Superior Project Alternative:

- Public water supply sufficient to serve residential development;
- Location within urban center near services, shopping, and employment;
- Easy walking and biking distance (proximity) to existing, major employers;
- Location outside of high-fire hazard area and high-fire interface zones;
- Infringement on urban-rural boundary;
- Location on major transit corridors and proximity to public transit;
- Proximity to existing Class I bikeways and alternative transportation infrastructure;

We appreciate your attention to our comments.

Sincerely,
SEPPS
PLANNING & PERMITTING SERVICES, INC.

Laurel Fisher Perez, AICP
Principal Planner

Cc: Ron Caird, Property Owner

Comment Letter I.104 – [Laurel Fisher Perez, Suzanne Elledge Planning & Permitting Services, Inc.]

Comment Response I.104-1

The comment provides general background information regarding the proposed Project and the existing setting and proposed development for properties located in the South Patterson Agricultural Area of the Eastern Goleta Valley (Rezone Site Nos. 4-7).

Please refer to Master Response 1.

Comment Response I.104-2

The comment provides background on water rights issues within the Eastern Goleta Valley and the existing preeminent water rights given to the Caird family under the Wright v. Goleta Water District suit. The comment further expresses the suitability of Rezone Site Nos. 4-7 for residential development.

Please refer to Master Response 1. These comments have been noted and will be forwarded to decision-makers for future consideration.

Comment Response I.104-3

The comment expresses opposition to the selection of Alternative 3 – Reduced Project A Alternative as the Environmentally Superior Alternative due to this alternative's inclusion of Rezone Site Nos. 1 (Giorgi), 8 (San Marcos Growers 1), 9 (San Marcos Growers 2), and 11 (Glen Annie), and the exclusion of Rezone Site Nos. 4-7. The comment asserts that Rezone Site Nos. 1, 8, 9, and 11 are less suitable for residential development than Rezone Site Nos. 4-7 due to existing environmental constraints present on those sites and asks that the EIR reconsider the selection of the Environmentally Superior Alternative.

Detailed discussion of and justification for the selection of the Environmentally Superior Alternative is presented in Section 4.6, *Identification of Environmentally Superior Alternative.* As discussed therein, the EIR acknowledges that although CEQA does not provide specific guidance in this matter, where an alternative is anticipated to result in reduced impacts for a majority of resource areas and/or substantially reduced impacts in especially critical resource areas, this can support a finding that the alternative is environmentally superior. Reduced Project A was selected as the Environmentally Superior Alternative as it results in the greatest reduction in adverse impacts of the four feasible alternatives compared to the proposed Project. Based on the analysis of the Reduced Project A Alternative, while this alternative includes other potential rezone sites that would result in the conversion of urban agriculture, by eliminating Rezone Site Nos. 2-7, the County determined that this alternative would preserve urban agriculture to the maximum extent feasible while still meeting the County's RHNA plus the 15 percent buffer for lower- to moderate-income units. In addition, the elimination of Rezone Site Nos. 2-7 was found to substantially reduce impacts to aesthetics and visual resources, loss or conversion of agricultural resources, hazards and hazardous materials (ALUCP Safety Zones), noise (operational roadway noise and airport noise compatibility), and utilities and water supply (solid waste). This alternative would also result in incremental reductions in impacts to other resource areas including air quality (operational), energy, GHG emissions, groundwater (Goleta Groundwater and Santa Maria River Valley basins), population and housing, and public services and recreation.

With regard to inclusion of the Rezone Site No. 1 (Giorgi) and No. 11 (Glen Annie) in the Reduced Project A Alternative, please refer to Section 4.4.1, *Removal of Potential Glen Annie and South Patterson Agricultural Area Rezone Sites.* As discussed therein, inclusion of an alternative would that eliminate Rezone Site No. 11 (Glen Annie) and all rezone sites within the South Patterson Agricultural Area was determined to be infeasible, as it would not be capable of fully accommodating the County's RHNA plus the 15 percent buffer for lower- to moderate-income units, despite the fact that such an alternative would potentially reduce impacts associated with conversion of agricultural resources, wildfire hazards, airport safety, airport noise, and water supplies. Given State mandates, the County is required to develop a program that could feasibly accommodate the County's RHNA plus 15 percent buffer for lower- to moderate-income units. As such, the development of such an alternative warrants consideration of the differences between the impacts of the alternatives and the trade-offs between types of impacts.

LOZEAU DRURY LLP

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Oakland, CA 94612

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February 9, 2024 Via E-mail

Hannah Thomas
County of Santa Barbara
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101
housingelement@countyofsb.org

Re: Comments Regarding Draft Program Environmental Impact Report for the County of Santa Barbara 2023-2031 Housing Element Update - Case No. 23EIR-00000-00004

Dear Ms. Thomas,

I am writing on behalf of Glen Annie Canyon Ranch and Glen Annie Organics ("GACR"), a family-owned ranch, concerning the Draft Program Environmental Impact Report ("DEIR") for the 2023-2031 Housing Element Update for County of Santa Barbara (State Clearinghouse No. 2022070490) ("Project"). GACR has been operating in the hills above Goleta for nearly four decades, faithfully fulfilling the County's important general plan goals to preserve the agricultural heritage of the community and open space. The ranch is located immediately adjacent to the Glen Annie Golf Course, which the DEIR designates as Site #11 and proposes to rezone the site from its current agricultural zoning to design residential (hereinafter "Glen Annie"). The development identified in the DEIR for the Glen Annie site includes 2,600 multi-family dwelling units and 73 single family dwellings.

GACR appreciates the need for the County to identify and facilitate the development of additional residential housing in order to make headway on the ongoing housing crisis in California. However, equally compelling for Santa Barbara County is its historic commitment to preserving and protecting the County's agricultural lands and economy and open space. GACR strongly objects to the proposed rezoning of the Glen Annie site. The DEIR is fundamentally flawed because the significant site-specific environmental impacts of the proposed rezoning project for the Glen Annie site are not addressed. The EIR fails to provide sufficient baseline information for the Glen Annie site and surrounding properties necessary to evaluate that component of the overall Project's potential significant environmental impacts. Likewise, the DEIR leaves readers and the Supervisors uninformed about the impacts of the Project's proposed rezoning of the Glenn Annie site.

I.105-1

In order to comply with the California Environmental Quality Act ("CEQA"), the DEIR must be dramatically supplemented to address the Project's proposed rezoning of the Glenn

Annie site, including the most probable development scenario or scenarios for that site. The site specific impacts of the County's maximum development scenario must be disclosed and analyzed. In addition, the landowner of the Glen Annie site has prepared a conceptual plan of their desired development at the site. This range of specific development details anticipated at Glen Annie does not support the County's assertion in the DEIR that the probable development resulting from the proposed rezoning is not known or speculative. Because of the details required by the Government Code to address the Regional Housing Needs Allocation ("RHNA") as well as those provided by the landowner, there is no barrier to determining the most probable development that would result from the proposed rezoning. The DEIR cannot hide behind a blanket desire to only address impacts on a programmatic-level and avoid any specific rezoning site's impacts or the probable development of a rezoned site. Instead, CEQA requires the County to include sufficient detail in its DEIR to evaluate the impacts of rezoning the Glen Annie site, including the probable development identified by the RHNA as well as the landowner.

I.105-1 Cont.

GACR is concerned the DEIR's serious omission of any analysis of impacts of the Glen Annie rezoning undermines the ability of the Supervisors to compare the alternatives identified in the DEIR. Additionally, because of the flaws in the DEIR's analysis of the impacts from the proposed rezoning of the Glen Annie site, the County cannot proceed with any alternative that includes that rezone site. The County should amend and recirculate the DEIR to incorporate the requisite environmental analyses and mitigation measures for any proposal including the rezoning of the Glen Annie site.

These comments are supported by several expert reviews of the DEIR and its analyses. Biologist Shawn Smallwood, Ph.D., has visited the Glen Annie site and prepared a review of the DEIR's failure to address that site's wildlife values and the significant impacts that will result from the foreseeable residential development of the site. Dr. Smallwood's expert comments and curriculum vitae are attached hereto as Exhibit A. RCH Group Consultants has prepared a peer review of the DEIR's air quality and greenhouse gas analyses. RCH Group's comments and relevant resumes are attached hereto as Exhibit B. Traffic Engineer Thomas Brohard, PE, has calculated the additional vehicle miles travelled that will result from the proposed Glen Annie rezone. Mr. Brohard's comments and resume are attached hereto as Exhibit C. Lastly, Indoor Environmental Engineer Francis Offermann, PE CIH, has provided expert comments on the overall project's significant health risks due to formaldehyde emissions to indoor air from composite wood products that will be widely used in the projected residential developments. Mr. Offermann's comments and curriculum vitae are attached as Exhibit D.

I.105-2

After reviewing the Project and DEIR together with our expert consultants, it is evident that the DEIR is wholly inadequate and fails to analyze the potential environmental impacts of the project as a whole, as required by CEQA. Because the most probable development of the lands identified in the Sites Inventory may have significant environmental impacts on the adjacent operations, wildlife, farmland, and air quality, the City must prepare a revised EIR that adequately discloses and analyses Project impacts before proceeding with the Project.

I. LEGAL BACKGROUND.

The EIR is the very heart of CEQA. (*Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.) "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (*Communities for a Better Environment v. Calif. Resources Agency* (2002) 103 Cal. App. 4th 98, 109.)

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. (14 Cal. Code Regs. ("CEQA Guidelines") § 15002(a)(1).) "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'" (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.) The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." (*Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs*. (2001) 91 Cal. App. 4th 1344, 1354 ("Berkeley Jets"); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.)

I.105-3

Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all feasible mitigation measures. (CEQA Guidelines § 15002(a)(2) and (3); *see also*, *Berkeley Jets*, 91 Cal.App.4th at 1344, 1354; *Citizens of Goleta Valley*, 52 Cal.3d at 564.) The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced." (Guidelines §15002(a)(2).) If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." (Pub. Res. Code § 21081; 14 Cal. Code Regs. § 15092(b)(2)(A) & (B).) The lead agency may deem a particular impact to be insignificant only if it produces rigorous analysis and concrete substantial evidence justifying the finding. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 732.).

II. DISCUSSION.

A. The County's DEIR Fails to Identify Likely Future Development or Assess the Resulting Impacts of Rezoning The Glen Annie Site and Other Sites in the Housing Element Update.

The DEIR cavalierly claims that the County cannot evaluate any of the site-specific impacts for any of the 36 proposed rezoning sites. However, the calculations of dwelling units for each site necessary to comply with the RHNA provides sufficient detail to evaluate each zoning site's potential significant impacts. Not only are there specific numbers calculated for the Glen Annie site for the RHNA evaluation, there also is a development plan released by the site owner, depicting a probable development plan for that site. The County cannot avoid confronting the impacts of that development and the maximum development either by labelling the EIR

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programmatic or making believe it has no details about probable development there and indeed all 36 proposed rezone sites. Disclosing, evaluating and mitigating the impacts of the development resulting from rezoning the listed sites is essential in this DEIR because of the likelihood that many of the future projects will be ministerial, with no opportunity to address impacts left unaddressed at this stage.

1. Merely labelling an EIR "programmatic" does not absolve the County from addressing the probable development identified for the rezone sites.

A "project" is "the whole of an action" directly undertaken, supported, or authorized by a public agency "which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." (Pub. Res. Code § 21065; CEQA Guidelines § 15378(a).) Under CEQA, "the term 'project' refers to the underlying activity and not the governmental approval process." (*California Unions for Reliable Energy v. Mojave Desert Air Quality Mgmt. Dist.*, 178 Cal. App. 4th 1225, 1241 (2009) [quoting *Orinda Ass'n v. Bd. of Supervisors*, 182 Cal. App. 3d 1145, 1171-72 (1986)].) The definition of "project" is "given a broad interpretation in order to maximize protection of the environment." (*Lighthouse Field Beach Rescue v. City of Santa Cruz*, 131 Cal. App. 4th 1170, 1180 (2005) (internal quotation omitted).) A project need not involve tangible physical activity so long as the agency's discretionary action has the potential to lead to either a direct or a reasonably foreseeable indirect physical change in the environment. (*See Communities for a Better Env't v. Cal. Res. Agency*, 103 Cal. App. 4th 98, 126 (2002) ("Governmental organizational activities, such as annexation approvals and school district reorganizations, which constitute an essential step culminating in an environmental effect are 'projects' within the scope of CEQA."); *see also, e.g., Muzzy Ranch*, 41 Cal. 4th at 382-83; *Fullerton Joint Union High Sch. Dist. v. State Bd. of Educ.*, 32 Cal. 3d 779, 796-97 (1982); *Bozung v. Local Agency Formation Comm'n*, 13 Cal. 3d 263, 277-81 (1975).)

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Although absent a specific development proposal for a parcel, an EIR would not be as detailed regarding that development, the CEQA review at the annexation, zoning and pre-annexation development agreement stage nevertheless must focus on those decisions' "secondary effects that can be expected to follow…." (14 Cal. Code Regs. § 15146(b).) At a zoning stage, the County's environmental review need not "describe in detail each and every conceivable development scenario" that could be proposed consistent with the County's zoning ordinance. However, the environmental review must take into account "the most probable development patterns." (*City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325, 1337.) "The fact that the environmental consequences of a rezoning may be more amorphous than those flowing from a precise development plan does not compel the conclusion that no EIR is required." (*Id.*, citing *City of Carmel-By-The-Sea v. Bd. of Supervisors* (1986) 183 Cal.App.3d 229, 250.) "Thus the difficulty of assessing future impacts of a zoning ordinance does not excuse preparation of an EIR; such difficulty only reduces the level of specificity required and shifts the focus to the secondary effects." (*Carmel-By-The-Sea*, 183 Cal.App.3d at 250.)

In the context of a General Plan Housing Element and the related proposed zoning changes intended to comply with the County's RHNA, the foreseeable development is much less

amorphous. Indeed, the Housing Element update and proposed residential rezoning is intended to facilitate the approval and construction of 3,008 housing units – 2,521 of which wold be located in the South Coast portion of the County. "The housing element must … identify actions that will be taken to make sites available to accommodate the local government's share of the regional housing needs." (Gov. Code, § 65583(c)(1).) "Where the inventory of sites … does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, rezoning of those sites, including adoption of minimum density and development standards … shall be completed" by specified time frames. (Gov't Code § 65583(c)(1)(A).) Accordingly, the County's Project focuses on specific parcels that are proposed for rezoning. The rezoning decision would lock in residential development for those sites with specific minimum and maximum densities, setbacks (or lack thereof), and design guidelines. In many instances, the subsequent specific permitting-level decisions would be ministerial and not subject to any further review pursuant to CEQA. In other words, the DEIR likely is the last opportunity for the County to address the impacts of anticipated development ensuing from the rezoning decisions.

The County's designation of the DEIR as a "program" EIR does not dictate the level of detail and analysis required to be included in the DEIR to be sufficient under CEQA. "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." (Guidelines, § 15146.) "Designating an EIR as a program EIR also does not by itself decrease the level of analysis otherwise required in the EIR." (*Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency* (2000) 82 Cal.App.4th 511, 533. *See also Citizens for a Sustainable Treasure Island v. City & Cnty. of San Francisco* (2014) 227 Cal.App.4th 1036, 1048 ["courts strive to avoid attaching too much significance to titles in ascertaining whether a legally adequate EIR has been prepared for a particular project'].) "The level of specificity of an EIR is determined by the nature of the project and the 'rule of reason' [citation], rather than any semantic label accorded to the EIR." (Id. at 533-34, citing *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 741–742.) The courts "focus on whether the EIR provided decision makers with sufficient analysis to intelligently consider the environmental consequences of [the] project." (*Citizens for a Sustainable Treasure Island*, 227 Cal.App.4th at 1052.)

I.105-4 Cont.

The activity underlying the DEIR is not limited to the County's adoption of the Housing Element in the General Plan. The Project also includes proposals to rezone 36 specific sites from various existing zonings to new zonings authorizing new and higher density residential development. (DEIR, p. 2-37, Table 2-13.) Of these 36 rezone sites, 3 sites in the County's Rural Area are proposed to be rezoned from agriculture to residential. (*Id.*, p. 3.2-30 [Rezone Sites 11, 15, and 16].) The Glen Annie site is one such site.

2. The probable development that will follow any rezoning of the Glen Annie Site is identifiable.

The Glen Annie site is identified as Rezone Site No. 11 by the DEIR. (*See* DEIR, p. 2-37, Table 2-13.) Based on the DEIR, one can glean that the site consists of three parcels – APNs 077-530-021, 077-530-020, and 077-530-012. (*Id.*) The site's current zoning is AG-II-40. (*Id.*, p.

3.10-31, Table 3.10-3.) "The intent of the AG-II zone is to preserve these lands for long-term agricultural use." (County of Santa Barbara, Planning and Development, "Summary of Zones in Santa Barbara County".) The "Potential Zoning" is DR-1.5 and DR-30/40. (*Id*.) It is within the South Coast RHNA Subregion and it is 94.7 acres in size. (*Id*.) The general location of Glen Annie is depicted in Figure 2-2.A northwest of the intersection of Cathedral Oaks Road and Glen Annie Road north of the City of Goleta. (*Id*., p. 2-24.)

The residential use dictated by the proposed rezoning at Glen Annie is specific, establishes the minimum and maximum development densities and calculates the expected additional units that could be built from applying the State Density Bonus Laws. The site would split into two zones. (DEIR, p. B-11, Table B.) "Zone 1" would include 44.7 acres of the 94.7 acre site. (*Id*.) Zone 1 is proposed to be rezoned DR-1.5. (*Id*.) DR-1.5 allows a density of up to 1.5 single family homes per acre. (County Code § 35.23.060; Summary of Zones, p. 4.) The DEIR calculates that 73 single family dwellings could be developed in this portion of the Glen Annie site. (*Id*.) "Zone 2" would encompass the remaining 50-acres of the Glen Annie site and would be rezoned DR-30/40. (*Id*.) DR-30/40 authorizes at least 30 units per acre and up to 40 units per acre. (Summary of Zones, p. 4.) The DEIR calculates that 2,600 multi-family dwelling units could be developed on this portion of the site. (*Id*.) Buildings within a DR zone may be up to 35 feet in height or up to 40 feet in height where they meet certain affordable, senior or special care housing. (County Code §§ 35.23.050(A), Table 2-10; 35.23.060(D).) Setback minimums are 20 feet, 10 feet and 10 feet for the front, side, and rear of each lot. (*Id*. § 35.23.050(A), Table 2-10.)

In addition to those specific characteristics flowing from the rezoning, the owner of the Glen Annie site has circulated a conceptual plan for residential development at the site. (JTVC LLC, Glen Annie Conceptual Site Plan [attached hereto as Exhibit E.) Given the foreseeability of that announced plan by the landowner, the DEIR must address that alternative in addition to the worst case scenario specific to the Glen Annie site. The Conceptual Plan lays out an alternative with residential areas ranging in density from 5 to 30 dwelling units per acre.

I.105-4 Cont.

3. The DEIR fails to provide the environmental setting, site specific impact analyses, and adequate mitigations necessary to address the development anticipated at a rezoned Glen Annie site and other rezone sites.

Despite the specificity of rezoning Glen Annie and other specific parcels for residential housing, the County's DEIR attempts to sidestep any discussion of site-specific impacts at those 36 proposed rezone sites. As a result, for numerous impacts, the DEIR fails to provide sufficient, or in many cases, no information disclosing the environmental setting of the rezone sites. This is particularly true for the Glen Annie site. Similarly, no localized impacts from the reasonably anticipated development at Glen Annie as well as other rezone sites is presented in the DEIR. The DEIR fails to describe the relative contribution of each of those sites to the numerous significant cumulative impacts of rapid development on agricultural lands, identified on a programmatic level in the DEIR. Lastly, the generalized mitigation measures identified for some of the Project's impacts are largely deferred and unenforceable. The following discusses specific concerns for numerous impacts from the proposed rezoning of Glen Annie. Each of these

concerns extend to other rezone sites as well.

I.105-4 Cont.

i. The DEIR does not contain sufficient analysis to intelligently consider the aesthetic impacts of rezoning and development of the Glen Annie site.

For example, in establishing the environmental setting for analysis of aesthetic impacts, the DEIR's aesthetic and visual resources discussion does not even mention Glen Annie. The closest it gets to discussing the proposed rezoning of this site's aesthetic baseline is a discussion of the Eastern Goleta Valley. (DEIR, p. 3.1-5.) It states, for example:

> Eastern Goleta Valley contains a multitude of public scenic resources, such as: mountain viewpoints along the SR 154 corridor; island/ocean and coastal views along SR 154 from Painted Cave Road to the intersection with State Street; 360 views provided from locations such as More Mesa and San Antonio Creek Road to its intersection with SR 154; the community 'gateway' at State Street and SR 154; and local scenic routes, including North San Marcos Road from Cathedral Oaks Road to SR 154, SR 154 from Camino Cielo Road (ridgeline) to State Street, Turnpike Road from Hollister Avenue to Cathedral Oaks Road, and North Fairview Avenue to its terminus.

(*Id*.) Although it mentions a stretch of Cathedral Oaks Road well to the east of Glen Annie, there is no mention of any views or aesthetic setting of the Glen Annie parcels. The aesthetics discussion notes that,"[a]pproximately 10.5 percent of lands countywide are classified as having high scenic value, while nearly 58 percent have low scenic value," but does not identify which of the proposed rezone sites, including Glen Annie, are within each category. (*Id*., p. 3.1-6.) Similarly, the aesthetics discussion highlights the value of "urban perimeters" but fails to mention that the Glen Annie rezoning parcels are on the current urban perimeter and focus on whether there are adverse effects on the adjacent existing neighborhoods. (*See id*., p. 3.1-7.)

I.105-5

The EIR sets forth and applies various thresholds of significance for aesthetic impacts, but none of those thresholds are applied to any specific site proposed for zoning, in particular the Glen Annie site. Although conceding some specific knowledge of the Glen Annie site, the DEIR only provides a conclusory sentence that the development resulting from the proposed rezoning at Glen Annie "may adversely affect the existing visual character or quality of public views in the Rural Area" and would "dramatically change" public views of the site. (DEIR, p. p. 3.1-23. *See also id*., p. 4-63 [noting the same in the alternatives discussion].)

Ultimately, the DEIR's aesthetic discussion concludes that the overall rezoning and Housing Element "impacts would remain significant and unavoidable." (DEIR, p. 3.1-25.) It does not state whether rezoning the Glen Annie parcels will have significant effects or not, though they might. (*Id*., pp. 3.1-20-3.1-25.) It does not indicate whether any significant visual effects of rezoning that site are avoidable through mitigation. (*Id*.) Nether the public nor the decision maker can discern the quality of the existing scenic values at the Glen Annie, the extent of the admitted impacts that the foreseeable development from rezoning the site would cause, or what, if any mitigation measures might diminish the significant visual impacts.

a. The DEIR fails to address the light impacts and sky glow impacts of rezoning and developing the Glen Annie site.

Similarly, the visual impact discussion on light or glare impacts acknowledges that "[f]uture development could increase nighttime light and glare in the Rural Area because of additional housing, including at potential rezone sites where existing agricultural-zoned properties could be rezoned to residential use." (DEIR, p. 3.1-25.) However, no specific consideration of the light, glare, or sky glow impacts of rezoning the Glen Annie site are mentioned in the DEIR. (*Id*.) Nevertheless, the DEIR claims these impacts would be insignificant with the application of the County's outdoor lighting ordinance. (*Id*., p. 3.1-26.) It is impossible for a reader or decision-maker to corroborate whether this conclusion could possibly be correct for the development anticipated for Glen Annie without a reasoned analysis of this large, isolated project on the "Urban Perimeter" and "highly visible from public vistas in the foothills and local public roads." (DEIR, p. 4-63.)

b. The DEIR nullifies mitigation measures implemented by the Glen Annie Golf Course EIR without consideration of their feasibility.

In 1993, the Santa Barbara County Board of Supervisors completed CEQA review for the Glen Annie Golf Course ("Glen Annie Golf Course EIR"), and adopted a series of mitigation measures as part of the Conditional Use Permit. (*See* Santa Barbara County Conditional Use Permit Case No. 91-CP-BOS ("CUP 91-CP-BOS"), Para. 17. attached as Exhibit F.) The Glen Annie Golf Course EIR also required several aesthetic mitigation measures, including requiring exterior lighting to be low-intensity, hooded and shielded inward from project boundaries, all signs to be made of wood, all buildings to be natural building colors and materials, and all new utilities onsite to be undergrounded. (*Id.*, Para. 5-8.) The DEIR makes no mention of the Environmental Impact Review conducted for the Glen Annie Golf Course EIR, nullifying previously adopted mitigation measures on the Glen Annie site without any disclosure or analysis.

I.105-5 Cont.

Under CEQA, "[m]itigating conditions are not mere expressions of hope." (*Sierra Club v. Cty. of San Diego*, 231 Cal.App.4th at 1167–68, quoting *Lincoln Place Tenants Assn. v. City of Los Angeles* ("*Lincoln Place I*") (2004) 130 Cal.App.4th 1491, 1508.) "A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures." (PRC § 21081.6(b).) "[W]here a public agency has adopted a mitigation measure for a project, it may not authorize destruction or cancellation of the mitigation—whether or not the approval is ministerial—without reviewing the continuing need for the mitigation, stating a reason for its actions, and supporting it with substantial evidence." (*Katzeff v. Dept. of Forestry & Fire Protection* (2010) 181 Cal.App.4th 601, 614.) If adopted mitigation measures prove infeasible, the agency must undertake supplemental environmental review to determine an appropriate replacement mitigation. (*Lincoln Place I*, 130 Cal.App.4th at 1508.) "If a mitigation measure later becomes 'impractical or unworkable,' the 'governing body must state a legitimate reason for deleting an earlier adopted mitigation measure, and must support that statement of reason with substantial

evidence.'" (*Sierra Club*, 231 Cal.App.4th at 1168, citing *Lincoln Place I,* 130 Cal.App.4th at 1509; PRC § 21081.6(b).)

The existence of the Glen Annie Golf Course EIR is substantial evidence of feasible mitigation measures not considered in the Housing Element Update EIR. The County cannot nullify the existing mitigation measures without due analysis. A revised DEIR is necessary to consider the feasibility of maintain all mitigation measures imposed for the Glen Annie Golf Course.

I.105-5 Cont.

ii. The DEIR does not contain sufficient analysis to intelligently consider the agricultural impacts of rezoning and development of the Glen Annie site.

The DEIR purports to address impacts of the rezoning proposals on agricultural resources, including among other potential impacts, the loss of agricultural viability and consistency with agricultural zoning. (DEIR, p. 3.2-1.) "Agricultural resources include any farmland with the potential for agricultural productivity based on soil and other physical characteristics." (*Id*.) The EIR does identify several of the parcels proposed to be changed from agricultural zoning to high density residential zoning located in the Eastern Goleta Valley. (*Id*., p. 3.2-7 – 3.2-8.) However, scarce mention is made of the Glen Annie site, despite its Agricultural II zoning. The one sentence where the Glen Annie site is mentioned is where the DEIR discusses Impact AG-2, which includes effects of converting lands zoned as agricultural as well as conflicts with existing zoning. (DEIR, p. 3.2-30.) The DEIR identifies the Glen Annie site as one of three sites in the Rural Area "that could be rezoned to Design residential (DR zoning." (Id.) Glen Annie is by far the largest of the three sites, comprising 94.7 acres of the 119.5 acres comprising those three sites. (*Id. See id*., p. __.) The entirety of the DEIR's discussion of the Glen Annie site states, "Rezone Site No. 11 (Glen Annie) is zoned AG-II-40 and located north of the City of Goleta; this is currently developed as a golf course and is surrounded by productive rural agricultural uses such as orchards." (DEIR, p. 3.2-30.) No further information in the DEIR lays out the quality of viable farmland at the site or the operations that occur on the adjacent farmed areas. (*See id*., p. 3.2-33 [one other mention of Rezone Site No. 11 Glen Annie] in agriculture discussion].)

I.105-6

The proposed Project's inclusion of rezone sites on agricultural lands in the County's Rural Area contradicts several local policies. First Goal 1 of Agricultural Element of the County's Comprehensive Plan, which serves as a guide for addressing the future use of agricultural lands and resources, states that the County shall "assure and enhance the continuation of agriculture as a major viable production industry" in the County. (DEIR, p 3.2-17.) To that end, Policy I.E states that, "The County shall recognize that the generation of noise, smoke, odor, and dust is a natural consequence of the normal agricultural practices provided that agriculturalists exercise reasonable measures to minimize such effects." (*Id*., p 3.2-18.) In addition, Policy LUA-EGV-1.2, states that, "Non-agricultural development adjacent to agriculturally-designated property shall include buffers to protect agricultural land, operations, and characteristics. (*Id*., p 3.2-20. *See also id*., p. 3.2-23 – 3.2-24].) The DEIR neither recognizes that Glen Annie Site is adjacent to land in agricultural use (Glen Annie Canyon Ranch), and

makes no effort to recognize such impacts or make reasonable measures to minimize such effects.

The DEIR describes the significance thresholds adopted by the County to evaluate a project's impacts to agricultural lands. (DEIR, p. 3.2-25.) It includes a preliminary screening point system which, when a project exceeds a specific number, it would result in a potential significant impact from the conversion of agricultural use or "may result in substantial disruption of surrounding agricultural operations." (*Id*., p. 3.2-26.) The EIR includes the Glen Annie acres in its tally of how many acres would be lost to the rezoning. However, there is no effort in the EIR to apply these thresholds to Glen Annie. There is more of a focus on the Patterson Agricultural Area.

The DEIR relies on the fiction that it has no idea what the future development from the zoning changes would be, despite providing specific maximum development numbers for Glen Annie and other parcels. (DEIR, p. 3.2-26..) In the agricultural impact section, the DEIR asserts that "future project-level siting and design details, as well as the timing of future residential development, are not known. As a result, the impact analysis provided below does not evaluate individual impacts at a project- or site-specific level." (*Id*., p. 3.2-26.) However, the County has a duty to investigate the impacts of its proposed projects. (*Cty. Sanitation Dist. No. 2 v. Cty. of Kern* (2005) 127 Cal.App.4th 1544, 1597–98 ["the lead agency bears a burden to investigate potential environmental impacts"].) The notion that the County does not have siting details to evaluate agricultural impacts for rezoning the Glen Annie site is arbitrary. The location of the site is clear. (DEIR, p. 2-23, Fig. 2-2.A.) The maximum development of the site relied on in the Site Survey also is clear. ((DEIR, App. B, p. B-11, Table B.).)The proposed uses and density are also mapped out. ((DEIR, App. B, p. B-11, Table B.).) Even a little investigation by the County would have identified the conceptual plan for residential development of the site prepared by the Glen Annie owners. (Glen Annie Conceptual Site Plan [attached as Exhibit E].)

I.105-6 Cont.

In the end, the DEIR's agricultural impact section concludes that the rezoning and Housing Element project will have a significant and unavoidable impact. However, there is no indication whether that finding applies to the Glen Annie site. Instead, it appears to be based on the concerns expressed over the Patterson Agricultural Area:

> The conversion of agriculturally zoned land along with the encroachment of residential land uses and the increasing isolation of remaining agriculturally zoned lands within the South Patterson Agricultural Area. As a result, the proposed Project would have a significant and unavoidable impact.

DEIR, p. 3.2-32 [there appears to be a text error in this sentence of the DEIR].) The DEIR also finds that these conversions will have significant and unavoidable cumulative impacts as well. (*Id*., p. 3.2-33.) However, the lack of information regarding the Glen Annie site and the adjacent agricultural operations makes it impossible for a reader or the Supervisors to understand the extent of these impacts resulting from rezoning the Glen Annie site.

iii. The DEIR arbitrarily finds that there are no feasible measures to mitigate, at least partly, the Housing Element Update's significant and unavoidable agricultural impacts.

Perhaps most striking is the DEIR's failure to adopt any mitigation at all to address the admittedly significant and unavoidable impacts to agricultural lands. The DEIR does tally up the total acres of agriculturally zoned lands that would be converted – 403.65 acres. It then notes that, "[m]itigating the loss of agriculturally zoned lands and the decrease of agricultural productivity typically involves the conservation of other agriculturally viable lands." (DEIR, p. 3.2-32.) "Based on the sites inventory, such mitigation would need to involve conservation or conversion of up to 403.65 acres of other agriculturally viable land elsewhere in the unincorporated county." (*Id*.) Having identified that typical mitigation, the DEIR then does an about face, suggesting that because that mitigation would not fully mitigate the lost acreage of farmland, it's infeasible. (*Id*.) Accordingly, the DEIR tersely concludes that "no mitigation measures are feasible." (*Id*.) Although identifying the typical mitigation of preserving at least an equal amount of agricultural lands at another location in the County, no effort is made in the DEIR to identify any such mitigation lands. Nor is there any discussion of a mitigation to conserve more acres than are being converted, for example, two or three times as many acres.

CEQA prohibits a lead agency from approving a project with significant environmental effects if there are feasible mitigation measures or alternatives that can substantially lessen or avoid those effects. (PRC §21002; *Mountain Lion Found. v. Fish & Game Comm'n* (1997) 16 Cal.4th 105, 134; *Laurel Heights*, 47 Cal.3d at 403 ["The chief goal of CEQA is mitigation or avoidance of environmental harm"].) CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." (PRC §21061.1; 14 CCR §15364.) "The core of an EIR is the mitigation and alternatives sections." (*Goleta II*, 52 Cal.3d at 564.) When an EIR concludes that a project will have significant impacts, the lead agency has two duties: to meaningfully consider feasible mitigation measures and alternatives, and to identify mitigation measures and alternatives rejected as infeasible. (*See Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1353.)

I.105-6 Cont.

Rejected alternatives and mitigation measures must be "truly infeasible." (*City of Marina v. Bd. of Trustees of Cal. State Univ.* (2006) 39 Cal.4th 341, 369.) Infeasibility findings must be supported by substantial evidence in the record. (PRC §21081.5; 14 CCR §15091(b).) "The required findings constitute the principal means chosen by the Legislature to enforce the state's declared policy 'that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects…" (*City of Marina*, 39 Cal.4th at 350 [quoting PRC §21002]. *See* PRC §21081(a); 14 CCR §15091(a).)

In terms of the zoning changes proposed for agricultural parcels within the County, the DEIR fails to live up to these duties to adopt feasible mitigations and base any assertion of infeasibility on substantial evidence.

iv. The DEIR does not contain sufficient analysis to intelligently consider the air quality and health impacts of rezoning and development of the Glen Annie site.

The DEIR's discussion of air quality impacts also fails to address the probable development from the proposed rezone sites, in particular Glen Annie, and fails to provide sufficient detail about that and other proposed rezones commensurate with the site specific rezones being proposed.

a. The DEIR fails to address Glen Annie's and other rezone sites' operational air pollution impacts.

The 2,600 multifamily units that are a probable development from the proposed rezoning of the Glen Annie site greatly exceed the screening threshold identified for operational air pollution impacts by the SBAPCD. (*See* DEIR, p. 3.3-20, Table 3.3-4 [400 apartment dwelling units and 460 condo/townhouse dwelling units]; Dan Jones, RCH Group, *Peer Review Memorandum*, p. 3 (Feb. 8, 2024) ("RCH Comments"] [attached hereto as Exhibit B].) Nevertheless, the DEIR again opts not to address the operational emissions of either the Glen Annie site or any other site. (*Id*., p. 3.3-20 ["the impact analysis provided below does not specifically evaluate individual impacts at a project- or site-specific level"].) The DEIR attempts to justify this intended omission because "future project-level siting and design details, as well as the timing of future residential and mixed use development, are not known." (*Id*.) However, that is not the standard. Even absent specific details, the County must assess the impacts of the probable development authorized by the rezoning proposals. (*City of Antioch*, 187 Cal.App.3d at 1337.).) Although flawed, the DEIR applies CalEEMod and attempts to quantify the construction emissions with two of the proposed rezone sites, applying CalEEMod's default inputs for the proposed uses. (DEIR, p. 3.3-22 [applying CalEEMod defaults].) As RCH's review states, "At a maximum buildout of 2,673 housing units, it is clear the Glen Annie site would exceed the screening criteria and the SBCAPCD's operational thresholds of significance for ROG and NOx (25 lbs/day)." (RCH Comments, p. 3.) Nothing precludes the County from doing a proper operational (and construction) air pollution assessment of Glen Annie's 2,673 proposed housing units. (*Id*.)

I.105-7

b. DEIR fails to address Glen Annie and other rezone sites' health risk impacts to nearby sensitive receptors.

The CEQA Guidelines and the County require an EIR to address whether a proposed project may expose sensitive receptors to substantial pollutant concentrations or emit toxic or hazardous air pollutants in amounts which may increase cancer risk. (DEIR, p. 3.3-16 – 3.3-17.) The DEIR acknowledges that "[e]missions generated by construction activities that are most likely to cause adverse effects on nearby sensitive receptors typically include fugitive dust (PM), diesel particulate matter (DPM) emissions, CO, NOx, and ROGs (O3 precursors)." (*Id*., p. 3.3-36.) Of greatest concern are the DPM emissions, a known carcinogen and toxic air contaminant.

I.105-8

The DEIR does not identify the environmental baseline at the Glen Annie site from which to consider the health risks that would result from DPM emissions during construction of the

probable development at the site. The presence of nearby residents as well as Dos Pueblos High School are not disclosed. The thin setbacks required for the DR zone indicate that construction activities likely would occur right up to the property line. (County Code, § 35.23.050(A), Table 2-10.)

As the DEIR notes, "[f]or projects that involve the generation of TACs, health risk assessment modeling may be required to determine the significance of impacts on nearby sensitive receptors." (DEIR, p. 3.3-26.) "The significance threshold for long-term public health risk is set at 10 excess cancer cases in a million for cancer risk." (*Id*.) As the DEIR also freely acknowledges, the DEIR makes no effort to calculate the health risks from constructing the predicted 2,673 units of housing at Glen Annie. (RCH Comments, pp. 2-3.) Instead, the DEIR asserts an unsubstantiated conclusion that, even with respect to carcinogenic DPMs, construction emissions would be temporary and would fluctuate. (DEIR, p. 3.3-36.) Absent a health risk assessment specific to the Glen Annie site and based on a worst-case development proposal, there is no substantial evidence for the County to justify these general assertions not to worry about DPM emissions. As RCH's review concludes, the "proposed Glen Annie site development is a major long-term construction project that would elevate cancer risk in the vicinity of the site for potentially a decade or longer depending on the intensity and phasing of development." (RCH Comments, pp. 2-3.) There is no reason the DEIR could not assess the health risks of the development scenario identified for the Glen Annie site and make sure the existing residents are aware of any health risks that may result.

The effort to draw general conclusions about construction air pollution from two rezone sites also does not capture the potential construction related impacts from PM10 and other pollutants for all of the proposed rezone site. (RCH Comments, pp. 1-2.) In regard to the Glen Annie site, the two other sites do not represent a worst case construction emission scenario given the inclusion of single family dwellings at Glen Annie. (*Id*.) "Because the two sites selected for site-specific construction impact analysis are neither representative of all the other sites or the worst-case scenario, those analyses cannot be applied to the Glen Annie site anticipated development." (*Id*., p. 2.) "It is feasible for the County to include proper construction impact modeling and analysis for each of the proposed 36 Rezone sites." (*Id*.) By failing to address construction health risks and other pollution emissions, the DEIR fails to consider the potential significant air pollution and health impacts from the construction of the probable development identified for the Glen Annie site.

I.105-8 Cont.

c. The DEIR contains no information assessing the Glen Annie site's cumulative air and GHG impact contributions.

The DEIR admits the overall development anticipated from the Housing Element update will have cumulative air pollution impacts from operation of the new development. (DEIR, p. 3.3-40.) However, because the DEIR's analysis fails to look at the expected development on a site specific level, the DEIR does not provide any information about Glen Annie's or any other specific site's, expected contribution to this cumulative impact.

I.105-9

For example, although the DEIR concludes that the GHG per service population would

be reduced program wide by the proposed Housing Element and rezones, that analysis does not provide any information whether a particular rezone project would have a cumulative impact standing alone. (*See* DEIR, p. 3.7-20.) The Glen Annie site's anticipated development greatly exceeds the County's size-based screening criteria for GHG emissions. (RCH Comments, p. 4. *See* DEIR, p. 3.7-15, Table 3.7-2.) As RCH explains, "[t]his is a flawed approach as individual projects should be assessed on a project-by-project basis because individually some Rezone sites could exceed the County's efficiency threshold…." (*Id*., p. 4.) Nor is there any obstacle to the County running "proper site-specific CalEEMod modeling and conduct a project specific operational GHG emissions impact analysis of the anticipated development at the Glen Annie site." (*Id*.)

I.105-9 Cont.

d. The DEIR's proposed air impact mitigation measures are unenforceable, deferred, and insufficient.

Despite its failure to disclose the potential impacts of development that probably will ensue at rezoned sites, the DEIR nevertheless proposes a mitigation measure to address Equipment Exhaust. (DEIR, p. 3.3-41 [MM AQ-2].) The proposed mitigation would only apply to projects "proposed on County-owned lands and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law…." (*Id*.) MM-AQ-2 then lists a long list of measures, every one of which is qualified by the phrase "to the maximum extent feasible," and others further qualified by the phrase "where feasible," or "if feasible." (*Id*., p. 3.3-41 – 3.3-42.) For example, the first listed measure is that: "Diesel equipment meeting the CARB Tier 3 or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible." (*Id*., p. 3.3-41.) By leaving the determination of feasibility undecided to some future, in many cases, ministerial process, there is no determination that the CARB tier actually to be used on projects in any of the rezone areas will be Tier 3. Mitigation measures must be fully enforceable – not possibly enforceable – through permit conditions, agreements or other legally binding instruments. 14 CCR § 15126.4(a)(2). *See Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal. App. 4th 683, 730 (project proponent's agreement to a mitigation by itself is insufficient; mitigation measure must be an enforceable requirement).

I.105-10

Nor is there any discussion or evidence cited explaining why only Tier 3 is required. CARB Tier 4 is the currently available pollution control requirement. Because the cumulative air pollution impacts are deemed significant and unavoidable, the County is must require all feasible mitigations which would be CARB Tier 4. (*See Preservation Action Council*, 141 Cal.App.4th at 1353; RCH Comments, p. 3.) The DEIR fails to address the feasibility of requiring CARB Tier 4 for all housing projects anticipated under the proposed rezonings.

Mitigation Measure AQ-3 also is inconsistent with CEQA because it would defer consideration of any operational air emissions for the probable developments until some future date after the EIR is completed. (RCH Comments, p. 3.) "A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA." (*Sundstrom v.*

County of Mendocino (1988) 202 Cal.App.3d 296, 307.) "[A]n agency goes too far when it simply requires a project applicant to obtain a ... report and then comply with any recommendations that may be made in the report. (*POET, LLC v. State Air Res. Bd.* (2013) 218 Cal.App.4th 681, 736.) The methodology employed by the DEIR precludes public review and comment on the future, proposed mitigation measures.

In addition, the laundry list of potential measures outlined in MM AQ-3 are mere examples of what "[p]ossible mitigation measures to reduce long-term emissions could include, but are not limited to the following." (DEIR, p. 3.3-43.) As a result, MM AQ-3 does not identify enforceable mitigation measures. (See *Woodward Park Homeowners*, 150 Cal.App.4th at 730.) A public agency may not rely on mitigation measures of uncertain efficacy or feasibility. (*Kings County Farm Bureau*, 221 Cal.App.3d at 727.) Moreover, many of the development projects anticipated for the rezone sites may be subject to ministerial approvals, so it is not clear how the County would add enforceable mitigation conditions to those ministerial projects. The DEIR fails to grapple with either the operational impacts of the probable development scenario for each rezoned site as well as the feasible mitigation measures that could be disclosed and required as part of the EIR process.

I.105-10 Cont.

v. The DEIR does not contain sufficient analysis to intelligently consider the wildlife and habitat impacts of rezoning and development of the Glen Annie and other sites.

The DEIR's discussion of impacts to biological resources also fails to address the probable development from the proposed rezone sites, in particular Glen Annie, and fails to provide sufficient detail to establish a baseline or assess likely impacts.

Expert biologist Shawn Smallwood, Ph.D., has reviewed the DEIR's discussion of biological resources and visited the Golf Course. (*See* Smallwood Comments, attached hereto as Exhibit A.) Drawing on his familiarity with the project area and decades of studying and surveying many of the species encountered at the site, Dr. Smallwood has prepared a critique of the DEIR, pointing out numerous shortcomings in the baseline assessment of the presence of species at the site, failures to evaluate impacts that will result from the Project, especially at the Glen Annie site, and numerous instances where the DEIR's assertions are insufficient or not supported by substantial evidence.

I.105-11

a. The EIR fails to identify the likely presence of sensitive and other wildlife species at the Glen Annie and other sites.

In establishing the environmental setting for analysis of biological impacts, the DEIR relies on its programmatic nature to justify no site-specific surveys, and instead relies on long-range planning documents, recent EIRs, and associated technical studies even though the sources it admits have not been "ground-truthed." (DEIR, p. 3.4-1). Dr. Smallwood highlights the importance of such surveys to characterize the environmental setting as a basis for opinion on or predicting project impacts to biological resources. (Smallwood Comments, p. 27.)

Further, the DEIR continues to primarily assess impacts on a regional level, only

mentioning Glen Annie insofar as to say that "The Glen Annie Golf Course located north of the City of Goleta is traversed by one unnamed creek and is bordered by several areas of coastal sage scrub habitat and a perennial segment of Glen Annie/Tecolotito Creek and has a well-developed riparian corridor to the east." (DEIR, p. 3.4-6.) The presence of sensitive species is only established at a regional level (i.e. per housing market area (HMA), with no site-specific information. (*Id.*, p. 3.4-7.) As discussed in detail above in Section II.A.1, labelling the DEIR "programmatic" does not relieve the County of its obligation under CEQA to establish a baseline from which to analyze Project impacts, including the rezoning for development of a specific site. As Dr. Smallwood explains, "An impacts analysis should consider whether and how a proposed project would affect members of a species, larger demographic units of the species, the whole of a species, and ecological communities. The accuracy of this analysis depends on an accurate characterization of the existing environmental setting. In the case of the proposed project, the existing environmental setting has not been accurately characterized." (Smallwood Comments, p. 28.)

Proving the feasibility of site-level surveys, on January 23rd, Dr. Smallwood conducted a 3.8 hour site visit to Glen Annie with biologist Noriko Smallwood, and detected 64 species of vertebrate wildlife, including 10 special-status species of wildlife in less than four hours. (Smallwood Comments, pp. 1, 4.) Of the 10 special-status species observed, only 1 is even mentioned generally in the DEIR. (DEIR, p. 3.4-6 [mentioning turkey vulture roosts identified in the Eastern Goleta Valley Community Plan].) Dr. Smallwood noted the presence of keystone species, including California ground squirrels and Botta's pocket gophers. (*Id.*, p. 4.). The presence of ground squirrel burrows is closely associated with the presence of burrowing owls that frequently use the squirrel burrows. (*Id.*) Of the hundreds of sites of proposed projects Dr. Smallwood has surveyed, he noted that this project site "was one of the very busiest with wildlife and yielded one of the longest lists of species we detected in a single survey." (*Id.*) Dr. Smallwood predicts that with a much larger survey effort 56 special-status species of vertebrate wildlife would be detected at the site. (*Id.*, pp. 25-26.) Based on the survey conducted, Dr. Smallwood predicts that the "the Glen Annie Site is indicative of a species-rich wildlife community that warrants a serious survey effort." (*Id.*, p. 26.) Dr. Smallwood clarifies that this survey would only be a starting point and elucidates the need for further surveys. (*Id.*)

I.105-11 Cont.

Dr. Smallwood also pointed out the necessity of a desktop review, *i.e.* literature and database review, to adequately opine on project impacts. (Smallwood Comments, p. 27.) Dr. Smallwood points out the County's failure to conduct a thorough desktop review to identify the occurrence likelihoods of special-status species of plants and wildlife on the project sites. (*Id.*, p. 27.) According to Dr. Smallwood, "[t]he desktop review completed for the County's Housing Element Update DPEIR provides a coarse-grained starting point for a project-specific desktop review, but it is too coarse-grained and too much of it is likely founded on outdated information." (*Id.*)

Dr. Smallwood conducted his own desktop review, and found that 129 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential, of which 20 (15.5%) have been documented on the project site, and another 64 (49.6%) species have been documented within 1.5 miles of the site. (*Id.*,p. 27-28; *Id.*, p. 29-33,

Table 2). The site therefore supports multiple special-status species of wildlife and carries the potential for supporting many more special-status species of wildlife based on proximity of recorded occurrences. Furthermore, Dr. Smallwood found 32 special-status species of plants known to occur near enough to the site to warrant analysis of occurrence potential, 1 of which has been documented within 1.5 miles of the site, and 4 of which have been documented within 1.5 and 4 miles. (*Id.*, pp. 28, 34-35, Table 3.) According to Dr. Smallwood, the site needs to be surveyed by qualified botanists, and the surveys need to at minimum meet the standards of the California Department of Fish & Wildlife's 2018 survey protocols. (*Id.*) Given the findings of his survey efforts and desktop review, Dr. Smallwood concludes, "it is clear that the Housing Element Update DPEIR's characterization of the existing environmental setting needed for impact analysis at the Glen Annie Site is insufficient, and cannot serve as a baseline for analyzing potentially significant impacts." (*Id.*, p. 28.)

Establishing an accurate baseline is the sine qua non to adequately analyzing and mitigating the significant environmental impacts of the Project. (*See* CEQA Guidelines, § 15125(a); *Save Our Peninsula*, 87 Cal.App.4th at 121-123.) The failure to make any attempt at a site-specific analysis skews the baseline. Such a skewed baseline ultimately "mislead[s] the public" by engendering inaccurate analyses of environmental impacts, mitigation measures and cumulative impacts for biological resources. (*See San Joaquin Raptor Rescue Center,* 149 Cal.App.4th at 656; *Woodward Park Homeowners,* 150 Cal.App.4th at 708-711.) By failing to conduct any site-specific analysis and disregarding the presence of key species from the project sites, especially Glen Annie, the DEIR fails to establish and otherwise skews the entire biological resources baseline for the Project. This undermines the DEIR's central purpose as an informational document preventing the public and decision-makers from understanding project impacts or weighing alternatives.

I.105-11 Cont.

b. The DEIR does not meaningfully analyze biological impacts at the site-level.

The DEIR excuses itself from a meaningful wildlife impacts analysis because "…a complete analysis of potential site-specific impacts is not possible as site-specific development plans and site-specific biological resource assessments are generally unavailable. This is because precise quantification of potential impacts (e.g., native vegetation or tree removal) is not possible as no site-specific development plans are available, and mapping of community-wide or regional resources is often necessarily high-level and in many cases outdated." (DEIR, p. 3.4-26.) As discussed above, the lack of site-specific development plans does not preclude a meaningful analysis of likely impacts based on expected development. (*See supra* § II.A.1.) The proposed rezonings know the specific sites, the number of dwelling units and the required setbacks. The sites are all readily observable. And the comparative biological richness of the 36 sites is an important consideration under CEQA for the Supervisors to take into account when making their final rezoning decisions.

c. The DEIR fails to account for productive capacity reduced by habitat loss at the Glen Annie and other sites.

Without any characterization of the environmental baseline of any project Site, the DEIR fails to meaningfully account for reduction in productive capacity of the sites included in the Housing Element Update due to habitat loss. Without any specifics, the DEIR relies on a vague impacts analysis that only generally acknowledges that "undeveloped sites in rural areas typically provide more habitat value and have higher concentrations of sensitive biological resources." (DEIR p. 3.4-28 - 3.4-29.)

The only reference to habitat loss impacts at Glen Annie is a vague recognition that "the development of Rezone Site No. 11 (Glen Annie) could impact riparian habitat, including riparian habitat within the Riparian Corridor Overlay along an unnamed drainage on the western portion of the site, the bordering perennial segment of Glen Annie Canyon and Tecolotito Creek, and onsite coastal sage scrub habitat." (DEIR, p. 3.4-29.) Despite the fact that the Housing Element-related zoning will determine which sites are rezoned for residential development in accordance with RHNA, the public and decision-makers are left to wait until the residential developments are planned before any meaningful environmental impact analysis is conducted.

Dr. Smallwood's comments highlight that habitat loss and habitat fragmentation have been recognized as the most likely leading causes of a documented 29% decline in overall bird abundance across North America over the last 48 years. (Smallwood Comments, p. 36.) Dr. Smallwood's field research has found that development generally results in a 66% loss of species on a site, including 90% decline in vertebrate animals. (*Id*.) Dr. Smallwood's "results indicated that urban development substantially reduced vertebrate species richness and numerical abundance, even after richness and abundance had likely already been depleted by the cumulative effects of loss, fragmentation, and degradation of habitat in the urbanizing environment." (*Id.*)

I.105-11 Cont.

Based on his own field research, Dr. Smallwood estimates that development on the 94-acre Glen Annie rezone site would result in the loss of 3,055 nest sites and 10,082 birds per year denied to California annually. (Smallwood Comments, p. 36.) Dr. Smallwood found that the loss of 3,055 nest sites would qualify as a potentially significant and very substantial project impact. The EIR fails to meaningfully identify and analyze likely significant impacts such as impacts to nesting sites. Dr. Smallwood's analysis demonstrates that impacts analysis at each of the Sites considered in the DEIR is both reasonably feasible and necessary. *(Id*.) A revised DEIR must be prepared and recirculated to adequately analyze habitat loss impacts across the Project sites.

d. The DEIR fails to address the Project's impacts on wildlife movement at the Glenn Annie and other sites.

While the DEIR recognizes that the Project's impacts to wildlife movement are potentially significant and could substantially impact Glen Annie (DEIR, p. 3.4-22, 34.-33), the DEIR makes no effort to reasonably estimate or analyze such impacts, either "programmatically" or at a level necessary to evaluate the 36 specific rezone sites. Without being able to compare the

relative impacts of the various proposed rezone sites, the DEIR fails to assist to provide the Supervisors the necessary information to make the most informed selection of sites to rezone.

As with habitat loss, while the DEIR pays lip service to potentially significant impacts to wildlife movement without any site-specific analysis, Impact BIO-3 recognizes that the Project, in general, "could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites." (DEIR, p. 3.4-33.) However, the cursory discussion only gives a sentence at most to considering site-specific impacts. Furthermore, it mentions Glen Annie only once in stating that "similar impacts could occur along Glen Annie Canyon and Tecolotito Creek with the development of Rezone Site No. 11 (Glen Annie)." (*Id.*) It is not clear if that refers to impacts to migratory birds from removal of vegetation or other impacts.

With respect to Bio Impact 4, the County notes "the proposed Project could result in significant impacts on creek corridors protected by County policies due to the potential future importation of large amounts of fill and other flood control improvements that could raise potential policy conflicts with possible significant impacts to biological resources." (DEIR, p. 3.4-34.) There is only a vague explanation that several sites "occur on or adjacent to sensitive habitat associated with creeks… could impact coastal sage scrub, oak woodland, and individual oak trees, which would potentially conflict with adopted policies." (*Id.*, pp. 3.4-34 - 3.4-35) No specific habitats or policies are described or the extent of the conflict.

I.105-11 Cont.

The DEIR fails to specifically look at the impacts to birds at Glen Annie or generally. The Smallwoods observed many birds moving across the Glen Annie, including Canada geese, snow geese, a greater white-fronted goose, red-tailed hawks, turkey vultures, a Cooper's hawk, mourning doves, acorn woodpeckers, western bluebirds, house finches, and birds of many other species. ((Smallwood Comments, p. 36.), p. 37.) Dr. Smallwood states that constructing 2,673 residential units on the Glen Annie site would interfere with wildlife movement in the region. He found that an analysis is needed to estimate the potential interference and consider feasible mitigation measures. (*Id.*)

e. The DEIR fails to analyze potentially significant impacts to avian species from window collision mortality at Glenn Annie and other sites.

Dr. Smallwood also found the DEIR fails to analyze potentially significant impacts to avian species from window collision mortality. As the Smallwoods' survey demonstrates, the Glen Annie Golf Course today is open space that is a vibrant habitat to many birds who not only nest onsite but fly across it. (Smallwood Comments, pp. 36, 38.) The DEIR's proposal to construct 2,673 residential units would result in the introduction of thousands of glass windows which will impair the birds' use of the aerosphere—a critical part of avian habitat onsite. (*Id.*) Dr. Smallwood notes that window collisions are the second or third largest source of human-caused bird mortality and reviews copious studies demonstrating the substantial bird fatalities from window collisions. (*Id.*, p. 39-40.) While no specific information of glass coverage is

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available at this point, Dr. Smallwood estimates based on average window coverage, that construction of 2,673 residential units on the Glen Annie site alone would kill 6,671 birds annually. (*Id.* at 41.) A bird-window collision mortality of this predicted magnitude would by highly significant. (*Id.*) Based on the ample evidence of likely significant bird-window collision mortalities, Dr. Smallwood found that an impact analysis was warranted across all sites. (*Id.*)

f. The DEIR fails to analyze potentially significant impacts to wildlife from road collision mortality.

Dr. Smallwood also found that the County's DEIR fails to account for likely significant impacts to wildlife from road collision mortality from increased traffic on, to and from the Project sites. (Smallwood Comments, p.41.) As Dr. Smallwood explains, vehicle collisions have accounted for the deaths of many thousands of amphibian, reptile, mammal, bird, and arthropod fauna, and the impacts have often been found to be significant at the population level. (*Id.*) Dr. Smallwood provides several studies demonstrating significant animal deaths due to collisions in the thousands annually per 100 km of road. (*Id.*) The DEIR has failed to analyze whether increased traffic generated by the Project would result in significant local impacts to wildlife.

Relying on data of average annual VMTs associated with residential use, Dr. Smallwood predicted 34,144 vertebrate wildlife fatalities per year at the Glen Annie site alone. Dr. Smallwood concludes that the Project-generated traffic would cause substantial, significant impacts to wildlife. (Smallwood Comments, p.43.) In fact, in his expert opinion, even a tenth of the calculated rate would be highly significant. (*Id.*)

I.105-12 Cont.

A revised DEIR must be prepared to analyze the significance of collision impacts from the Project at each site and as a whole, and if significant, implement feasible mitigation measures.

g. The DEIR fails to analyze potentially significant impacts from house cat predation.

Dr. Smallwood also found that the County's DEIR fails to account for likely significant impacts from house cat predation, especially on birds, as sites are converted to residential use. (Smallwood Comments, pp. 36, 37.) Based on prior studies, Dr. Smallwood estimates the introduction of 3,211 new cats at the Glen Annie site alone, which would kill 391,742 vertebrate wildlife per year. (*Id.*) Further, Dr. Smallwood pointed out that many of the wildlife fatalities caused by house cats would be in neighboring open spaces including any remaining riparian forest and coastal scrub. (*Id.*)

Dr. Smallwood also points out that cats contribute to downstream loading of *Toxoplasma gondii*, *a parasite that can infect virtually all warm-blooded animals, but the only known definitive hosts are cats*. A revised DEIR must be prepared to analyze the significance of cat predation impacts, and if significant, implement feasible mitigation measures. (Smallwood Comments, p. 38.)

h. No meaningful discussion of the Project's cumulative effects on wildlife is included in the DEIR.

Recognizing that several projects may together have a considerable impact, CEQA requires an agency to consider the "cumulative impacts" of a project along with other projects in the area. (Pub. Res. Code § 21083(b); 14 Cal. Code Regs. §15355(b).) If a project may have cumulative impacts, the agency must prepare an EIR, since "a project may have a significant effect on the environment if '[t]he possible effects of a project are individually limited but cumulatively considerable.'" (*CBE,* 103 Cal.App.4th at 98, 114; *Kings County Farm Bur.*, 221 Cal.App.3d at 721.) It is vital that an agency assess "'the environmental damage [that] often occurs incrementally from a variety of small sources . . .'" (*Bakersfield Citizens For Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1214.)

While the DEIR reported potentially significant and unavoidable cumulative impacts (DEIR, p. 3.4-37), the highly generalized cumulative impacts section makes no effort to actually analyze or address the House Element Update's cumulative impacts on wildlife and biological resources. It does not consider other projects in any capacity, only tautologically stating that "cumulatively considerable impacts" would result "if cumulative development would create substantial adverse direct and indirect impacts." (DEIR, p. 3.4-36.)

Dr. Smallwood found that, "[c]onsidering the size of the project, the degree of habitat fragmentation that has already occurred in the project area, and the magnitudes of perpetual project-caused wildlife mortality that would follow project development, an analysis is needed of the project's contributions to cumulative impacts." (Smallwood Comments, p. 43.) Dr. Smallwood predicts that the proposed residential construction at the Glen Annie site alone would deny California of 10,082 birds per year, which combined with the loss of bird productivity caused by existing, approved and planned development in the region would be significant. (*Id.*) He further predicts the project would contribute further to interference with wildlife movement in the region. "I predict the development of the Glen Annie Site would contribute annual mortality of 6,671 (95% CI: 3,961–9,381) birds due to collisions with windows, 391,742 vertebrate animals due to depredation by house cats, and 106,290 (95% CI: 11,046–201,533) wild animals due to collisions with project-generated road traffic." (*Id.*) These are "devastatingly large numbers of direct impacts to wildlife just at the Glen Annie Site alone, but these numbers would add to the tolls at the other DPEIR Sites and to those among other projects recently completed, underway or foreseeable." (*Id.*)

I.105-12 Cont.

A revised DEIR is necessary to adequately analyze the cumulative biological impacts of the Project.

i. The DEIR improperly characterizes analysis required by CEQA as mitigation.

The DEIR finds four significant and unavoidable biological impacts and sets forth three mitigation measures. The DEIR purports to require a Habitat Protection Plan (MM-BIO-2) and a Wildlife Movement Plan (MM BIO-3). (DEIR, pp. 3.4-39 – 3.4-41.) As Dr. Smallwood points out, "[a] fundamental flaw with this measure is that the required study is required of CEQA

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review and is not considered mitigation." (Smallwood Comments, p. 44.) CEQA disallows deferring the formulation of mitigation measures to post-approval studies. (CEQA Guidelines § 15126.4(a)(1)(B); *Sundstrom*, 202 Cal.App.3d at 308-309.) Along with the site specific impacts analysis discussed above, specific mitigations for the Glenn Annie site must be formulated. The same holds true for the other rezone sites.

I.105-13 Cont.

Enforceable mitigations, especially for proposed rezone sites like Glen Annie are necessary now because it is entirely uncertain whether the County will be able to enforce these future plan requirements when considering any ministerial housing projects in the future. (14 CCR § 15126.4(a)(2) (mitigation measures must be "fully enforceable"].).

j. The DEIR fails to implement feasible mitigation measures for significant and unavoidable biological impacts.

CEQA prohibits a lead agency from approving a project with significant environmental effects if there are feasible mitigation measures or alternatives that can substantially lessen or avoid those effects. (PRC §21002; *Mountain Lion Foundation*, 16 Cal.4th at 134.) Dr. Smallwood identifies several feasible mitigation measures that the DEIR fails to consider or implement despite significant and unavoidable biological impacts. Such mitigation measures include:[1]

- **Construction Timing:** Limiting construction at each Site to outside the avian breeding season. Further demonstrating feasibility of this measure, the Glen Annie Golf Course EIR required that construction not take place within 100 ft of the Glen Annie Creek during breeding season and required delineated fencing.

I.105-14

- **Preconstruction Surveys:** Following the completion of protocol-level detection surveys to inform a revised programmatic EIR, take-avoidance surveys should be performed for special-status species and breeding birds prior to construction.
- **Construction Monitoring:** Qualified biologists should be required to monitor construction impacts to wildlife and complete a report of findings and report all cases of potential construction harm to wildlife should be reported to the appropriate agencies.
- **Habitat Loss:** Compensatory mitigation is warranted for the acres of habitat that would be lost. At minimum, an equal area of open space should be protected in perpetuity close to each impacted site.
- **Buffers:** Dr. Smallwood recommends at least 600 feet of clearance between the wetland features and the nearest impervious surface. Buffered areas should be restored to natural vegetation cover appropriate to the area.

[1] Please see Dr. Smallwood's comment for a full description of each mitigation measure summarized here.

- **Pest Control:** The Project should commit to no use of rodenticides and avicides. It should commit to no placement of poison bait stations outside.
- **Guidelines on Building Design to Minimize Bird-Window Collisions:** The Project should adhere to available Bird-Safe Guidelines, such as those prepared by American Bird Conservancy and New York and San Francisco.
- **Window marking:** Requiring window marking to reduce bird mortality.
- **Monitoring:** Monitoring of bird fatalities from window collisions.
- **Road Mortality:** Compensatory mitigation funding research or donations to wildlife rehabilitation facilities (see below).
- **Fund Wildlife Rehabilitation Facilities:** Compensatory mitigation funding contributions to wildlife rehabilitation facilities to cover the costs of injured animals that will be delivered to these facilities for care.
- **Landscaping:** California native plant landscaping (i.e., grassland and locally appropriate scrub plants) should be considered to be used as opposed to landscaping with lawn and exotic shrubs and trees.

I.105-14 Cont

Furthermore, the Glen Annie Golf Course EIR included several mitigation measures for biological impacts that the County fails to disclose or analyze for feasibility as required by CEQA. For example, the Conditional Use Permit specified that "Impacts on Santa Barbara Honeysuckle shall be mitigated through preservation and restoration," and required a plan with several specific requirements including propagation at a ratio of 20 healthy seedlings per individual removed. (CUP 91-CP-BOS, Exhibit F, Para. 17.) The DEIR does not even mention California Honeysuckle, let alone consider potential impacts from the Project.

In addition, as mitigation for the Glen Annie Golf Course, an open space easement was created for preservation of created wetland areas in perpetuity. (*Id.*, ¶ 29.) The DEIR makes no mention of such easement and does not analyze how the proposed housing units may impact the permanent open space easement.

As discussed in Section II.A.3.i.b avove, the County may not erase prior enforceable mitigation measures on the Project sites without disclosure and analysis of their feasibility at this time. A revised DEIR is necessary to consider all feasible biological mitigation measures to mitigate significant and unavoidable biological impacts.

vi. The DEIR fails to identify and address the obvious transportation impacts that will result from the probable development of the Glen Annie site.

I.105-15

One of the more glaring omissions in the DEIR is its failure to acknowledge or discuss the obvious transportation impacts that will result from the proposed rezoning of rural sites, including in particular the Glan Annie site. As is the case with other screening thresholds

employed by the County, the development anticipated for the Glen Annie rezoning would greatly exceed the applicable thresholds triggering a VMT analysis of the specific development project. (DEIR, p. 3.14-36.) In the absence of any consideration of the Glen Annie rezoning project's transportation impacts, Traffic Engineer Tom Brohard has done some initial calculations to gauge the significant transportation impact of that one rezone site. (Brohard Comments, Exhibit C.) Mr. Brohard calculates that the current golf course use of the site generates 5,938 vehicle miles traveled per day. (*Id*., p. 2.) The probable development authorized by the proposed rezoning would generate 176,656 vehicle miles traveled per day. (*Id*.) So, in terms of the transportation impacts associated with that site, the additional VMTs are staggering. Were the number of dwelling units proposed for Glen Annie relocated to High-Quality Transit Corridors, the resulting VMT also would be reduced. (*See infra*. § II.C[alternatives discussion].) However, in the absence of a detailed transportation analysis of the Glen Annie site, it is impossible for the public or decision makers to weigh either the specific rezoning's transportation impacts or the deleterious effect it would have on the overall transportation impacts or benefits of the overall Housing Element project.

I.105-15 Cont.

B. The EIR Fails to Analyze Indoor Air Quality Impacts.

Mr. Offermann, a Certified Industrial Hygienist and Professional Mechanical Engineer, concludes that it is likely that the Project will expose future residents to significant impacts related to indoor air quality, and in particular, emissions for the cancer-causing chemical formaldehyde. Mr. Offermann is one of the world's leading experts on indoor air quality and has published extensively on the topic. Mr. Offerman's comment letter and curriculum vitae are attached as Exhibit D.

Mr. Offermann explains that many composite wood products typically used in modern home construction contain formaldehyde-based glues which off-gas formaldehyde over a very long time period. He states, "The primary source of formaldehyde indoors is composite wood products manufactured with urea-formaldehyde resins, such as plywood, medium density fiberboard, and particle board. These materials are commonly used in building construction for flooring, cabinetry, baseboards, window shades, interior doors, and window and door trims." (Offermann Comment, pp. 2-3.)

I.105-16

Formaldehyde is a known human carcinogen. (Offermann Comment, p. 2.) Mr. Offermann states that residents of the Project likely will be exposed to a cancer risk from formaldehyde of at least 120 per million. (*Id*., p. 4.) This is far above the Santa Barbara County Air Pollution Control District's CEQA significance threshold for airborne cancer risk of 10 per million. (DEIR, p. 3.3-26.) Mr. Offermann's cancer risk calculation of 120 in a million assumes the Project will use current "CARB-compliant" materials. (Offermann Comment, p. 3.)

The CARB requirements are known as the Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products (Formaldehyde ATCM"). (17 Cal. Code Regs. § 93120-93120.12.) The need for these regulations was based in large part on data collected by Mr. Offermann and a study he published in 2009 known as the California New Homes Study. (*See* Offermann Comment, p. 2.) Composite wood products include hardwood

plywood, particleboard ("PB"), and medium density fiberboard ("MDF"). (*Id*., § 93120(b); § 93120.1(a)(8).) The rules rely on prohibiting the sale, distribution, supply, or manufacturing of plywood, PB, and MDF that exceed formaldehyde emission standards established by the rule. (*Id*., § 93120.2(a).). The standards were phased in over a period of years. By January 1, 2009, composite wood products had to comply with the Phase 1 emission standards established for each type of product. (*Id*., § 93120.2(a) (a certain category of hardwood plywood products had until July 1, 2009 to meet the standard applicable to those products).). Each product category then had several years to comply with a lower Phase 2 standard. (*Id*., § 93120.2(a).). Thus, by January 1, 2010, no hardwood plywood with a veneer core could be sold in California without meeting its Phase 2 formaldehyde emission standard. (*Id*.) Particle board and MDF products had to comply with their Phase 2 standard by January 1, 2011. Thin MDF had to comply with its applicable standard by January 1, 2012. (*Id*.) The remaining plywoods with composite cores had to comply no later than July 1, 2012. (*Id*.)

Mr. Offermann provides his expert opinion that residences using materials that comply with the Phase 2 formaldehyde emissions standards will pose significant cancer risks based on his review of a follow-up study to his 2009 New Homes study as well as his own extensive experience studying and evaluating formaldehyde emissions from products and buildings. (Offermann Comments, pp. 2-3.) In 2016 through 2018, Chan et. al., 2018 measured formaldehyde levels in homes built between 2011 and 2015 with a mean construction completion date of 2014. (*Id*.) Thus, most of the homes included in the study were constructed with materials that were subject to the Phase 2 emission standards. (*Id*.) Mr. Offermann's expert comments are substantial evidence that, based on the available data, the Project may have significant health risks on future residents from the emissions of formaldehyde from the resulting development of new dwelling units. Because this impact was not addressed in the DEIR for the Project, the DEIR is insufficient and inadequate under CEQA. Mr. Offermann concludes that this significant environmental impact must be addressed in the DEIR and mitigation measures should be imposed to reduce the risk of formaldehyde exposure.

I.105-16 Cont.

The failure of the EIR to address the Project's formaldehyde emissions is contrary to the California Supreme Court's decision in *California Building Industry Ass'n v. Bay Area Air Quality Mgmt. Dist.* (2015) 62 Cal.4th 369, 386 ("*CBIA"*). In that case, the Supreme Court expressly holds that potential adverse impacts to future users and residents from pollution generated by a proposed project ***must be addressed*** under CEQA. At issue in *CBIA* was whether the Air District could enact CEQA guidelines that advised lead agencies that they must analyze the impacts of adjacent environmental conditions on a project. The Supreme Court held that CEQA does not generally require lead agencies to consider the environment's effects on a project. (*CBIA*, 62 Cal.4th at 800-801.) However, to the extent a project may exacerbate existing environmental conditions at or near a project site, those would still have to be considered pursuant to CEQA. (*Id*. at 801.) In so holding, the Court expressly held that CEQA's statutory language required lead agencies to disclose and analyze "impacts on ***a project's users or residents*** that arise ***from the project's effects*** on the environment." (*Id*. at 800 (emphasis added).)

The carcinogenic formaldehyde emissions identified by Mr. Offermann are not an existing environmental condition. Those emissions to the air will be from the Project. People will be residing in and using the residences anticipated by the Project once they are built and begin emitting formaldehyde. Once built, the Project's housing units will begin to emit formaldehyde at levels that pose significant health risks. The Supreme Court in *CBIA* expressly finds that this type of air emission and health impact by the project on the environment and a "project's users and residents" must be addressed in the CEQA process.

When a Project exceeds a duly adopted CEQA significance threshold, as here, this alone establishes a fair argument that the project will have a significant adverse environmental impact and an EIR is required. Indeed, in many instances, such air quality thresholds are the only criteria reviewed and treated as dispositive in evaluating the significance of a project's air quality impacts. (*See*, *e.g. Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949, 960 [County applies BAAQMD's "published CEQA quantitative criteria" and "threshold level of cumulative significance"]; *see also Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 110-111 ["A 'threshold of significance' for a given environmental effect is simply that level at which the lead agency finds the effects of the project to be significant."].) Since expert evidence demonstrates that the Project will exceed the SBAPCD's CEQA significance threshold, there is a fair argument that the Project will have a significant adverse effect and it must be addressed in the DEIR. Because this potential significant effect was not addressed at all in the DEIR, the DEIR fails as an informational document and fails to provide substantial evidence that there will not be significant impacts on human health due to indoor air pollution emissions. I.105-16 Cont.

Mr. Offermann suggests several feasible mitigation measures, such as requiring the use of no-added-formaldehyde composite wood products, which are readily available. Mr. Offermann also suggests requiring air ventilation systems which would reduce formaldehyde levels. Since the EIR does not analyze this impact at all, none of these or other mitigation measures have been considered.

C. The County's Alternatives Analysis is Flawed and Violates CEQA.

1. Legal background

"The core of an EIR is the mitigation and alternatives sections." (*Goleta II*, 52 Cal.3d at 564.) Where a project is found to have significant adverse impacts, CEQA requires the adoption of a feasible alternative that meets most of the project objectives but results in fewer significant impacts. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1988) 197 Cal.App.3d 1167, 1180-81; *see also*, *Burger v. County of Mendocino* (1975) 45 Cal.App.3d 322.) A "feasible" alternative is one that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (Pub. Res. Code § 21061.1; 14 Cal. Code Regs. § 15364.) I.105-17

One of CEQA's fundamental requirements is that the DEIR must identify the "environmentally superior alternative," and require implementation of that alternative unless it is

infeasible. (14 Cal.Code Regs. §1526.6(e)(2). Pursuant to CEQA Guidelines Section 15126.6(e), "if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." The lead agency must select the Environmentally Superior Alternative for implementation if feasible and would accomplish the basic project objectives, per CEQA Guidelines Section 15126.6(a), (c), and (f).

The "propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." (*Citizens of Goleta Valley*, 52 Cal.3d at 570.) While an agency may weigh and balance non-mandatory policies where its general plan expressly gives it this kind of discretion, an agency is not free to ignore policies that are clear and mandatory. (*Families Unafraid to Uphold Rural El Dorado ("FUTURE") v. Board of Supervisors of El Dorado County* (1998) 62 Cal.App.4th 1334, 1338.) A court need not find "an outright conflict between provisions before they can be found to be inconsistent . . . If the Updated Specific Plan will frustrate the General Plan's goals and policies, it is inconsistent with the County's General Plan unless it also includes definite affirmative commitments to mitigate the adverse effect or effects." (*Id*. at 379.)

2. The County's alternatives analysis does not give due weight to agricultural impacts from rezoning agricultural lands and inconsistencies of such action with federal, state and local policies.

I.105-17 Cont.

The proposed Project would potentially convert 403.65 acres of agricultural zoned lands to residential uses in contradiction to the goals set forth in several policies supporting the conservation of agricultural lands. For example, as the EIR recognizes, the state developed the FMMP in accordance with the Farmland Protection Policy Act of 1981 to inventory important farmlands to be prevented from unnecessary conversion to nonagricultural uses. (DEIR, p. 32-14.) The proposed Project would potentially convert 284.14 acres of Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance (as designated by the FMMP) to non-agricultural uses. (*Id*., p.3.2-29.)

The EIR finds the impacts of converting Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural use and converting agriculturally zoned lands to non-agriculturally zoned uses both to be significant and unavoidable. Further the EIR recognizes that, "the conversion of approximately 366 acres of agriculturally zoned lands within the South Coast would represent ***a substantial portion*** of lands zoned for agriculture within this region. (DEIR, p. 3.2-30 [emphasis added].) This impact is not only significant but directly contradicts policies intended to promote and preserve agricultural lands in the region.

Furthermore, the Land Use Element of the County's Comprehensive Plan has "four fundamental goals" aimed among other things "to prevent scattered urban development" and "to preserve cultivated agriculture and lands with both prime and non-prime farmland." (DEIR, p. 3.2-19.) In particular the Comprehensive Plan explicitly states that "***[i]n the Rural Areas***, cultivated agriculture shall be preserved and, where conditions allow, expansion and

intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses." (DEIR, p 3.2-19 [emphasis added].) The DEIR recognizes three rezone sites comprising 119.5 acres located in the County's Rural Area, that could be rezoned in contradiction with policies intended to specifically preserve agricultural lands in rural areas. (*See* DEIR, p.3-2-30.) Glen Annie accounts for the vast majority of rural agricultural land (94 acres) that would be converted in contradiction with the stated goals of the County's Comprehensive Plan. The DEIR's alternatives analysis does not give due weight to the conversion of agriculturally zoned land in rural areas.

Any more conversion of agricultural lands than is absolutely necessary to comply with RHNA, especially for those in rural areas (*i.e.* Glen Annie), would violate CEQA. CEQA prohibits a lead agency from approving a project with significant environmental effects if there are feasible mitigation measures or alternatives that can substantially lessen or avoid those effects. (Pub. Res. Code § 21002; *Mountain Lion Foundation*, 16 Cal.4th at 134; *Laurel Heights*, 47 Cal.3d at 403 ["The chief goal of CEQA is mitigation or avoidance of environmental harm"]); *see also City of Marina*, 39 Cal.4th at 369 [rejected alternatives and mitigation measures must be "truly infeasible"].) While the DEIR eliminated consideration of an alternative that would eliminate *all* rezoning of agricultural lands as infeasible, it does not provide adequate analysis to determine what alternative would reduce loss of agricultural lands in accordance with federal, state and local policy, especially rural agricultural sites such as Glen Annie, to the extent feasible.

I.105-17 Cont.

3. Nor does the County's alternatives analysis meaningfully weigh mandatory biological and aesthetic policies at odds with the proposed Project.

While the alternatives analysis makes mention of some policy considerations outside of RHNA, it fails to adequately weigh mandatory policies at odds with the Project's RHNA driven proposals.

First, the DEIR acknowledges that, for several alternatives, "potential conflicts with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources would be similar to those described for the proposed Project and would remain *significant and unavoidable*." (*E.g.* DEIR, pp. 4-49, 4-65.) Further, the DEIR notes that Glen Annie includes riparian habitat within the Riparian Corridor Overlay and excludes from rezoning would reduce such conflicts. (*Id.*, p. 4-65.) However, the DEIR does not undergo any meaningful analysis to discuss alternatives that would meaningfully reduce such conflicts.

Second, the alternatives analysis mentions in consideration of the Sustainable Communities Alternative that Rezone Site No. 11 (Glen Annie) would convert the Glen Annie golf course on agriculturally zoned land in a rural area to development for urban land uses, which "would conflict with County policies for rural area visual resource and result in substantial adverse effect on rural visual resource quality in the area." (DEIR, pp. 4-27-28.) The DEIR goes on to state that, eliminating Glen Annie, among a few others, would reduce potential conflicts and visual impacts compared to the proposed Project." (*Id.*, p. 28.) While the EIR goes on to

discuss additional aesthetic issues associated with that specific alternative, there is no further analysis or discussion weighing the importance of this policy conflict with the proposed Project.

The DEIR admits that removal of the Glen Annie site would reduce conflicts with both biological and aesthetic policies (in addition to agricultural policies discussed above). Yet the County selects an environmentally superior alternative without any attempt to weigh the importance of these different policies or relative conflicts with those policies. The County must meaningfully weigh and analyze different policy priorities and explain its rationale before selecting an environmentally superior alternative that includes the Glen Annie site.

4. Because the DEIR's impact analysis regarding the Glen Annie site was deficient, the alternatives analysis is fundamentally flawed, and no alternative include Glen Annie should be selected.

The EIR lacks sufficient detail to justify its alternatives analysis generally or its selection of Reduced Project A Alternative as the environmentally superior alternative.

The purpose of the alternatives analysis is to support the decision makers and to inform public participation. (*See Laurel Heights*, 47 Cal.3d at 404.) Thus, an EIR must also include "detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (*Id*. at 405.) To that end, the agency must include a quantitative assessment of the impacts of the alternatives. (*See e.g. Kings County Farm Bureau*, 221 Cal.App.3d at 733-73 [finding the EIR's discussion of a programmatic EIR to a coal-fired power plant project to be inadequate because it lacked necessary "quantitative, comparative analysis" of air emissions and water use, and that absent such data, the significance of the elimination of this impact was unknown].)

I.105-17 Cont.

A fundamental flaw in the DEIR's alternative analysis arises from its steadfast avoidance of assessing the individual impacts of the 36 sites proposed for rezoning. This is especially true for the DEIR's omission of the specific direct and cumulative agricultural, biological, aesthetic, traffic, and air quality impacts that will result from the identified development for the Glen Annie rezone site. By failing to identify the relative impacts of the 36 various sites, the DEIR fails to provide the Supervisors, and members of the public, with sufficient quantitative and comparative assessments sufficient to allow informed decision making or to accurately identify the environmentally superior alternative. For example, the EIR recognizes biological impacts are greater to rural lands, but the failure to assess the environmental baseline and likely impacts at a site-specific level prevents a meaningful analysis of alternatives that reduce impacts to agricultural lands. The DEIR must provide specific impact information for each of the proposed rezone sites necessary for the Supervisors not only to pick a mix of rezone sites that meets the RHNA targets, but also a mix of rezone sites that minimize the environmental impacts of the Housing Element and RHNA driven project.

Furthermore, the alternatives analysis lacks sufficient analysis of impacts to biological resources to allow for meaningful public participation. For example, the DEIR mentions in consideration of Reduced Project B Alternative that elimination of Rezone Site No. 11 (Glen

Annie) would reduce impacts to the riparian habitat (DEIR, p.4-6.5) but without adequate impacts analysis the extent or meaning of such reduction remains unknown.

Given the DEIR's gross underestimation of environmental impacts flowing from rezoning the Glen Annie site, the County lacks a basis for its selection of the Reduced Project A Alternative (which includes Glen Annie among sites rezoned as residential) as the environmentally superior alternative. The County should select an alternative that excludes the Glen Annie Golf Course from its rezoning areas.

I.105-17 Cont.

The County must revise and recirculate the DEIR with a legally sufficient alternatives analysis.

III. CONCLUSION

For the foregoing reasons, GACR urges the County to revise and recirculate the DEIR to address the deficiencies identified above. GACR reserves its right to supplement these comments during review of the EIR for the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist*. (1997) 60 Cal.App.4th 1109, 1120 ("any party may bring an action pursuant to section 21167 if it has raised an objection to the adequacy of an EIR prior to certification").

Thank you for your attention to these comments.

Sincerely,

Michael R. Lozeau

Comment Letter I.105 – [Michael Lozeau, Lozeau Drury LLP]

Comment Response I.105-1

The comment provides background information regarding Rezone Site No. 11 (Glen Annie) and the assumptions presented in the EIR for potential future development of this site under the proposed Project. The comment asserts that the EIR is fundamentally flawed because the EIR does not present site-specific analysis of the environmental setting and potential impacts associated with potential future development of Rezone Site No. 11 (Glen Annie). The comment further asserts that the EIR must be supplemented to address these project-specific impacts, including the most probable development scenario for the site.

As described in Section 1.*3, Program-Level EIR Analysis*, this EIR has been prepared pursuant to the requirements of CEQA Guidelines Section 15168, which clarify that a program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways. Please refer to Section 1.3, *Program-Level EIR Analysis* for a description of why this program-level analysis for the proposed Project is appropriate in this EIR. Consistent with these guidelines, this Program EIR evaluates the proposed Project as a whole. That is, the potential impacts associated with future housing development enabled under the Housing Element Update are analyzed based on information available to the County where reasonably foreseeable, direct, and indirect physical changes in the environment could occur programmatically. This Program EIR does not focus on any specific projects that may be implemented pursuant to the Housing Element Update. Instead, the analysis is informed by the sites inventory prepared by the County to estimate the total housing that could occur under the proposed Project, including the Potential Rezone Program, during the current 8-year housing cycle (2023-2031). This approach allows the Board of Supervisors to consider broad implications and impacts associated with the proposed Project while not requiring a detailed evaluation of individual properties. Some future projects may require more detailed environmental review pursuant to CEQA during the County permit process. In accordance with CEQA Guidelines Section 15168, the programmatic analysis and findings of this Program EIR may be incorporated by reference in subsequent environmental documents to describe regional settings, general effects, cumulative impacts, and other factors that may apply to individual housing development projects that implement the Housing Element Update.

With regard to reference to concept site plans for Rezone Site No. 11 (Glen Annie), these site plans were not submitted to County staff and advisory bodies for preliminary review and consideration until after issuance of the NOP and completion of the EIR scoping process, shortly before publication of the Draft EIR. Further, site plans for this site, and any other sites included in the sites inventory have been prepared independently by prospective developers of such sites, and these site plans are not directly related to the actions of the Project as proposed by the County and described in Chapter 2, *Project Description.*

With regard to the comments asserting that the EIR must be supplemented to include the most probable development scenario or scenarios for Rezone Site No. 11 (Glen Annie), the EIR provides detailed discussion and reasoning for the assumptions and worst-case development scenarios for which environmental impacts of the proposed Project are based upon. Specifically, Chapter 3,

Environmental Impact Analysis, presents detailed discussion of the assumptions utilized for this EIR analysis. As described therein, this EIR evaluates the proposed Project as a whole and considers the maximum potential buildout capacity scenario of the sites inventory, including all potential land use and zoning amendments identified in the Housing Element Update's programs and its sites inventory. Detailed information regarding the maximum potential buildout scenario for Rezone Site No. 11 (Glen Annie), assumes a maximum of 2,600 multi-family residential units and 73 single-family dwelling units (refer also to Appendix B). These buildout assumptions represent a maximum worst-case development scenario for this site, as well as all other sites identified in the sites inventory and the whole of the proposed Project, and the EIR provides a detailed programmatic analysis of potential impacts based on this worst-case development scenario. Where necessary, the EIR presents feasible programmatic mitigation measures which would apply to reduce impacts to the maximum extent feasible. The EIR also fully discloses in relevant discussions through this EIR where mitigation of impacts is considered infeasible. As such, no further edits or modifications to the EIR to sufficiently address potential impacts of the proposed Project are warranted.

Comment Response I.105-2

The comment references several separate, independently-prepared technical studies and peer reviews of the EIR analysis that are included as exhibits to the comment letter and provide support to the comments provided in this letter. The comment asserts that based on these separate, independently-prepared technical studies and peer reviews, that the EIR is inadequate and fails to analyze the potential environmental impacts of the proposed Project as a whole. The comment further asserts that the County must prepare a revised Draft EIR that adequately discloses and analyzes potential significant environmental impacts associated with probable development of lands identified in the sites inventory.

With regard to comments asserting that the EIR provides inadequate analysis of potential environmental impacts, please refer to responses to the responses to comments provided below that address each discrete topic or issue raised by the commenter.

With regard to the analysis of potential significant impacts associated with probable development of lands identified in the sites inventory, please refer to Comment Response I.105-1 above.

Comment Response I.105-3

The comment provides a summary of the CEQA Guidelines and caselaw addressing the purpose and intent of CEQA to inform decision makers and the public about the potential, significant impacts of a project and the avoidance or reduction of environmental impacts through information of feasible mitigation and project alternatives. These comments and references serve to provide background information regarding CEQA and do not directly comment on the scope or adequacy of the analysis, mitigation measures, and alternatives presented in this EIR. These comments have been noted.

Comment Response I.105-4

The comment asserts that the EIR fails to identify likely future development or assess impacts associated with the rezoning of sites included in the sites inventory. The comment asserts that programmatic analysis does not absolve the County from addressing probable development identified for rezone sites, and states that probable development of Rezone Site No. 11 (Glen Annie) is in fact identifiable. For detailed discussion of consideration, identification, and site-specific vs.

programmatic analysis of the probable development scenario of the whole of the Project and individual sites, please refer to Comment Response I.105-1 above.

Please refer also to Comment Response I.105-1 above for detailed response to comments relating to recent development plans that have been independently prepared by owners/developers of Rezone Site No. 11 (Glen Annie) following initiation of preparation of the Draft EIR.

The comment also states that in many instances, subsequent specific permitting-level decisions may be ministerial and would not be subject to further review pursuant to CEQA, and the Draft EIR is likely the last opportunity for the County to address impacts of anticipated development ensuring from rezoning decisions.

As described in Chapter 2, *Project Description*, the Program EIR conservatively analyzes the programmatic impacts of all housing sites based on the sites inventory, including the estimated worst-case development scenario for existing vacant sites, pending housing projects, County-owned sites, and potential rezone sites. The Housing Element Update does not include site plans for any housing site; therefore, the Program EIR analysis conservatively assumes a worst-case development scenario for each site based on its maximum allowed density at a height of four stories or more and with reduced required setbacks and buffers to allow for maximum capacities to be achieved. These worst-case development scenarios for each site are considered components of the whole project, as the Housing Element Update includes policies and programs that would apply to all sites in the inventory, varying by housing category and site characteristics (e.g., zoning).

However, the Housing Element Update does not permit or approve specific housing development projects, including any proposed housing development projects under consideration concurrently and separately from the Housing Element Update. (See also Master Response 2 and 3.) To be approved, all future housing projects would be subject to individual permitting processes under the County's zoning ordinances. Future housing development projects would be permitted through either a discretionary review process or a ministerial review process, depending on the project location and details, as follows:

The County's discretionary review process involves detailed site planning, site-specific CEQA environmental review (if necessary), and public hearings with the appropriate hearing body to approve the project (if necessary), including development plans and conditional use permits. Discretionary housing projects would involve site-specific CEQA analysis that could tier from the findings and mitigations in the Program EIR as they apply to the project.

The County's ministerial review process involves by-right processing where the project must demonstrate compliance with all applicable zoning standards and requirements for public health and safety, including zoning clearances and land use permits. Ministerial housing projects would be processed subject to the County's zoning ordinances, including objective development standards for building height, setbacks, and site access, among others, but would not trigger the requirements for site-specific project-level CEQA environmental review. While ministerial housing projects would not involve site-specific CEQA documentation, the findings and mitigations in the Program EIR that apply to by right projects would apply to all ministerial housing projects. As provided in Chapter 8, *Mitigation Monitoring and Reporting Program*, mitigation measures for by right projects are designed specifically to address site-specific impacts even though site-specific CEQA analysis is not required as part of the ministerial permitting process.

The Program EIR evaluates the potential for housing projects to be proposed and approved under either of these permitting processes and all housing development projects would be subject to the applicable mitigation measures required by the Program EIR for any required future development permitting process. The Program EIR assumes that permitting of all future housing development projects would occur through the County's discretionary review process unless the project qualifies for ministerial processing.

Since the sites inventory and Housing Element Update programs indicate that some housing projects could be processed under ministerial permits, the Program EIR assumes that discretionary requirements for site-specific mitigation under the County's zoning code would not apply consistently to all housing sites and mitigate impacts accordingly. The Program EIR includes a detailed MMRP to ensure site-specific impacts are addressed at a site-specific level for all ministerial and discretionary housing projects. As a result, the Program EIR mitigated the environmental impacts of the Housing Element Update to the extent feasible and provided findings of significance based on the maximum worst-case development scenario for all housing sites identified by the County. As a result, the Program EIR complies with CEQA to disclose the potential impacts of all future housing development enabled under the Housing Element Update and requires mitigation for future housing projects that might otherwise have not been subject to CEQA review under ministerial permitting in compliance with state housing law.

Comment Response I.105-5

The comment asserts that the EIR does not contain sufficient analysis to consider the aesthetic impacts of rezoning including impacts to visual character, scenic value, and nighttime light and glare. However, as previously discussed in prior responses to comments, the EIR provides a programmatic analysis of impacts as site-specific analysis of individual rezone sites is not feasible. Programmatic impacts to aesthetic and visual resources and mitigation measures necessary to reduce impacts based upon the whole of the proposed Project, including buildout of the housing sites inventory, is presented in Section 3.1, *Aesthetics and Visual Resources.* Please refer to Master Response 2 and Comment Response I.105-1 above.

Further, with regard to comments pertaining to the 1993 Glen Annie Golf Course EIR, as well as the Glen Annie Golf Course Conditional Use Permit and Conditions of Approval, the conditions of approval and mitigation measures required for the Glen Annie Golf Course as required by the 1993 Glen Annie Golf Course EIR were adopted and implemented specifically for development and operation of the existing golf course facilities. These conditions and mitigation measures would not be applicable to future development of the Rezone Site No. 11 (Glen Annie) and do not survive the termination of the golf course as assumed in this EIR.

Comment Response I.105-6

The comment asserts that the EIR does not contain sufficient analysis of impacts associated with the loss or conversion of agricultural resources and arbitrarily finds that no feasible mitigation exists to reduce significant and unavoidable impacts to agricultural resources. However, as previously described, the EIR provides a programmatic analysis of impacts as site-specific analysis of individual rezone sites is not feasible. (Refer to Master Response 2 and Comment Response I.105-1 above.) Programmatic impacts to agricultural resources, including from rezoning of sites supporting agricultural uses or zoning designations based upon the whole of the Project, including buildout of the housing sites inventory, is presented in Section 3.2, *Agricultural Resources.* As discussed therein

under Impact AG-2, implementation of the Project has the potential to directly and indirectly result in the conversion of agricultural land, loss of agricultural productivity, and/or conflicts with existing agricultural zoning of up to 403.65 acres. Mitigation of such impacts would require the conservation or conversion of an equal or greater quantity and quality of agriculturally viable lands, either through establishment of conservation easements, restrictive covenants or deeds, fee titles, payment of in-lieu fees to acquire mitigation property, farmland mitigation banks, etc. As identified by the commenter, CEQA requires an EIR to describe feasible mitigation measures which would minimize significant adverse impacts of a project (CEQA Guidelines Section 15126.4). However, based on the extent of impacts, the County determined that there is nowhere in the County that can regain the quantity and quality of agricultural acreage lost to new housing developments. Further, successfully implementing mitigation for the conservation of an equal quantity and quality of agriculturally viable land within a reasonable period of time in relation to implementation of the Project and the development of adequate housing to meet the County's RHNA plus 15 percent buffer for lower- and moderate-income units within the 8-year planning horizon is considered infeasible.

Comment Response I.105-7

The comment asserts that the EIR does not contain sufficient analysis of impacts associated with air quality and health impacts, particularly impacts associated with rezoning and development of Rezone Site No. 11 (Glen Annie). The comment letter references findings provided in an independent peer review of the EIR's air quality and GHG analysis prepared by RCH Group and which is included as an exhibit to the comment letter. Please refer to Comment Response I.105-1 above for detailed response to comments pertaining to the EIR's analysis of project or site-specific impacts and consideration of the probable development scenario.

With regard to the EIR's analysis of air quality and GHG impacts, these issues are thoroughly discussed and analyzed in Section 3.3, *Air Quality* and Section 3.7, *Greenhouse Gas Emissions*, respectively. As presented therein, operational air quality and GHG impacts are assessed programmatically based on the maximum worst-case development scenario (refer to Chapter 3, *Environmental Impact Analysis*). As described in Impact AQ-2, buildout under the Project would exceed adopted thresholds. Further, as identified by the commenter and as described under Impact AQ-2, Attachment A of SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (2022) includes a screening table list of common land uses the most common types of land uses and estimates the size of a specific project type that is expected to be less than the threshold of significance for reactive organic compounds (ROCs) and nitrogen oxides (NO_x) emissions from vehicles. Based on this table, an individual housing project involving greater than 290 detached single-family dwellings with a density of three dwelling units per acre or a project involving 400 multi-family dwellings with a density of 16 dwelling units per acre are anticipated to result in operational emissions exceeding SBCAPCD's operational mobile-source emissions thresholds. Based on the sites inventory prepared for the Housing Element Update and the buildout assumptions presented in this Program EIR, many housing sites, particularly higher density potential County-owned sites and potential rezone sites – such as Rezone Site No. 11 (Glen Annie) – would exceed these screening thresholds. To address impacts associated with long-term operational emissions from the operation of individual development projects, implementation of **MM AQ-3 (Project Screening and Project-specific Air Quality Evaluation)** would require applicants to prepare and submit a technical assessment evaluating the potential project operational air quality impacts to the County and identify project-specific mitigation feasible to reduce long-term area, energy, and mobile-source emissions below County and SBCAPCD thresholds of significance.

Given the programmatic nature of the Project and EIR, as discussed in Comment Response I.105-1, site-specific analysis or mitigation is not feasible at this time, due to uncertainties surrounding details for site specific development, design, construction timing, operational characteristics, etc. Nevertheless, mitigation measures presented in this EIR have been prepared pursuant to CEQA Guidelines Section 15126.4(a)(1)(B) which states that:

> *"[f]ormulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure."*

The mitigation measures presented in this EIR do not represent deferral of mitigation, even where mitigation involves requirement for site-specific study at a later date, the mitigation measures clearly identify requirements, performance standards, timing, and monitoring for the implementation of each measure either by the County or by individual applicants for housing development under the proposed Project.

Comment Response I.105-8

The comment asserts that the EIR fails to address site-specific health risk impacts to nearby sensitive receptors. Please refer to Comment Response I.105-1 above for detailed discussion and response to comments pertaining to the EIR's analysis of project or site-specific impacts. Detailed discussion and analysis of the potential air quality-related health risk impacts associated with the proposed Project, including impacts to sensitive receptors from construction-related diesel particulate matter emissions, toxic air contaminants, asbestos containing materials, and lead based paints, is presented in Impact AQ-3. To programmatically assess impacts, the EIR presents broad discussion of the type and range of impacts that could occur based on implementation of the Project, including development of Potential Rezone Program sites which are adjacent to sensitive receptors. As discussed in Section 3.3.2.2, *Sensitive Receptors,* sensitive receptors in the Project area include residences, parks, hospitals, long-term care facilities, daycare centers (including public and private childcare centers, and worksites with onsite childcare facilities), and schools adjacent to potential housing sites. While the EIR cannot provide a detailed inventory of all sensitive receptors located adjacent to potential housing sites, discussion in Section 3.3.2.2, *Sensitive Receptors* and Impact AQ-3 has been revised to provide examples of sensitive receptors which are known to be adjacent to and/or could be potentially affected by development of housing under the Project. This includes examples referenced elsewhere in this EIR, such as Dos Pueblos High School located near Rezone Site No. 11 (Glen Annie), and El Camino Elementary School located near Rezone Site Nos. 8 (San Marcos Growers 1), 9 (San Marcos Growers 2), 10 (McCloskey Leland), and 17 (Montessori), and Pending Project No. 42 (Tatum).

To reduce potentially significant impacts, the EIR identifies and requires **MM AQ-1 (PM_{10} and Dust Control)**, **MM AQ-2 (Equipment Exhaust)**, **MM AQ-4 (Project Siting and Interior Air Quality Protection)**, and **MM HAZ-1 (Environmental Site Assessment).** These air quality mitigation measures are derived from guidance from SBCAPCD for mitigating short-term PM_{10} emissions and fugitive dust impacts, as well as requirements of the County Grading Code. Implementation of these measures would require that applicants for future multifamily housing projects minimize short-term construction PM_{10} and fugitive dust emissions by implementing a variety of measures, including

frequent water of exposed soils, suppression of dust, limiting vehicle speeds on unpaved roads, installation of track out prevention devices, scheduling of earthwork activities during periods of low wind speed, and designation of persons to monitor and document dust control requirements. These mitigation measures represent industry and agency-approved best management practices that have been proven realistic, enforceable, and effective in reducing PM_{10} and fugitive dust emissions. Each of these measures would apply to individual applicants for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law, such as is anticipated for development of Rezone Site No. 11 (Glen Annie). However, as discussed in Comment Response I.105-4 above, if an individual project does not qualify for ministerial review and approval and/or objective standards according to state housing law, individual projects may be subject to discretionary review and approval by the County and be subject to compliance with additional standards or review requirements to address site-specific impacts. This may include subsequent site-specific environmental review under CEQA to assess project or site-specific impacts and mitigation.

Regarding comments concerning the EIR's air quality emissions calculations scenarios and application of mitigation to address site-specific construction impacts, please refer to Comment Response I.105-7 above.

Comment Response I.105-9

The comment asserts that the EIR contains no information assessing site-specific cumulative air quality and GHG impacts. Please refer to Comment Response I.105-1 above for detailed discussion and response to comments pertaining to the EIR's analysis of project or site-specific impacts. Detailed discussion and analysis of the programmatic impacts on air quality and GHG emissions, including cumulative impacts, are described in Section 3.3, *Air Quality* and Section 3.7, *Greenhouse Gas Emissions*, respectively.

Comment Response I.105-10

The comment asserts that the EIR's mitigation measures to reduce impacts to air quality are unenforceable, deferred, and insufficient. However, none of the EIR's mitigation measures are unenforceable, deferred, or insufficient. The mitigation measures identified throughout this EIR clearly identify requirements, timing, and monitoring for the implementation of each measure either by the County or by individual applicants for housing development under the proposed Project. With regard to air quality mitigation measures, these measures are derived from guidance from SBCAPCD for mitigating short-term PM_{10} emissions and fugitive dust impacts, as well as requirements of the County Grading Code. Implementation of these measures would require that applicants for future multifamily housing projects minimize short-term construction PM_{10} and fugitive dust emissions by implementing a variety of measures, including frequent water of exposed soils, suppression of dust, limiting vehicle speeds on unpaved roads, installation of track out prevention devices, scheduling of earthwork activities during periods of low wind speed, and designation of persons to monitor and document dust control requirements. These mitigation measures which include limitations on construction hours and requirements for dust monitors represent industry and agency-approved best management practices that have been proven realistic, enforceable, and effective in reducing PM_{10} and fugitive dust emissions.

Please also refer to Comment Response I.105-4 above for details regarding the County's review and approval process, applicability of mitigation measures, and potential need for future site-specific environmental review of housing projects.

Regarding comments concerning the requirements of **MM AQ-2** that all diesel construction equipment meet California Air Resources Board (CARB) Tier 3 engine requirements rather than CARB Tier 4 engine requirements, **MM AQ-2** has been revised to require that diesel equipment meeting the CARB Tier 4 or higher emissions standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible.

With regards to comments addressing adequacy of **MM AQ-3**, please refer to Comment Response I.105-7 above. Pursuant to CEQA Guidelines Section 15126.4, the EIR identifies and describes all applicable mitigation measures which would be feasible for reducing Project impacts as part of this EIR, and does not defer mitigation. The mitigation measures clearly identify requirements, performance standards, timing, and monitoring for the implementation of each measure either by the County or by individual applicants for housing development under the proposed Project, and requires that mitigation be implemented prior to future development of housing projects.

Comment Response I.105-11

The comment asserts that the EIR does not contain sufficient analysis of site-specific impacts to biological resources. The comment letter references findings provided in an independent peer review of the EIR's biological resource analysis and site-specific study of the existing biological resource setting of Rezone Site No. 11 (Glen Annie) and which is included as an exhibit to the comment letter. Please refer to Comment Response I.105-1 above for detailed discussion and response to comments pertaining to the EIR's analysis of project or site-specific impacts.

With regard to the EIR's analysis of biological resource impacts, impacts associated with potential adverse effects to special-status species, sensitive habitats, protected wetlands, wildlife movement, and conflicts with adopted plans and policies addressing biological resources are thoroughly discussed and analyzed in Section 3.4, *Biological Resources*. The EIR provides a detailed regional discussion and summary of the potential biological resources that could be impacted by the proposed Project, including the list of special-status species (refer to Appendix D for a detailed list) and known sensitive habitats that occur within the Project area. Impacts to biological resources are assessed programmatically by evaluating impacts related to potential development of full buildout of the Project (see Section 3.0.3, *Impact Assessment Methodology* for a description of buildout under the proposed Project). These buildout assumptions factor in the assumed maximum buildout scenario described in Chapter 3, *Environmental Impact Analysis* for all sites identified within the sites inventory, including for Rezone Site No. 11 (Glen Annie). While the EIR cannot feasibly provide a site-specific analysis of the existing environmental setting for each individual housing site or site-specific analysis of impacts associated with development of each site, the EIR identifies feasible mitigation to address site-specific impacts to the extent feasible, including for biological resources (see Section 3.4.4.4, *Proposed Mitigation*). Detailed site-specific evaluation of each applicable site required as part of these measures, including Rezone Site No. 11 (Glen Annie), is recognized in the EIR as necessary to address site-specific impacts; however, even with mitigation, the EIR concludes impacts would programmatically remain significant and unavoidable.

As previously described, due to the nature of the proposed Project, this EIR has been prepared pursuant to CEQA Guidelines Section 15168 and the standards for the preparation and use of a program EIR. Absence of site-specific analysis which is not feasible for this program EIR due to lack

of site-specific details and uncertainties surrounding future site development, construction specifications, and project-specific design features, does not make this EIR and its analysis insufficient.

Comment Response I.105-12

The comment asserts that the EIR fails to analyze potentially significant project and cumulative impacts to wildlife, including impacts from window collision mortality, road collision mortality, and house cat predation. However, potential adverse impacts to sensitive wildlife species and resources are thoroughly discussed under Impact BIO-2 and Impact BIO-4, while cumulative impacts are discussed in Section 3.4.4.3, *Cumulative Impacts*, in Section 3.4, *Biological Resources.* As discussed therein, residential and mixed use development could impact special-status species through a reduction in the number of species in the population or an impact on the habitat of such species, including rare, threatened, or endangered plants and wildlife. Increased human presence due to future residential and mixed use development enabled by the proposed Project could result in the loss or disruption of habitats that support the function and natural activities of special-status species. In some instances, increased human disturbance could also result in indirect harassment and/or predation or injury to special-status species. Other indirect impacts may include habitat modification, increased human/wildlife interactions, habitat fragmentation (Impact BIO-3), encroachment by exotic weeds, exterior lighting, noise, and/or changes in surface water flows and general hydrology due to development of previously undeveloped areas or required flood control or drainage improvements.

The discussion in Impact BIO-2 has been revised to specifically reference potential for increased window collision mortality, road collision mortality, and predation by house pets. However, these issues are already addressed as part of the analysis of Impact BIO-2. To address impacts to wildlife species, the EIR identifies **MM BIO-2 (Habitat Protection Plan)** and **MM BIO-3 (Wildlife Movement Plan)**, which would require that applications for these housing projects include a biological resources study that identifies the presence of sensitive biological resources including special-status species and wildlife linkages. Should sensitive biological resources be identified, the applicant shall be required to prepare and submit a Habitat Protection Plan (HPP) and Wildlife Movement Plan that identifies site-specific measures to avoid or reduce impacts on these resources.

Comment Response I.105-13

The comment asserts that the EIR improperly characterizes analysis required by CEQA as mitigation, asserting that the EIR defers mitigation and fails to identify enforceable mitigation for future housing development projects. Please refer to Comment Response I.105-7 above. Pursuant to CEQA Guidelines Section 15126.4, the EIR identifies and describes all applicable mitigation measures which would be feasible for reducing impacts as part of this EIR, and does not defer mitigation. The mitigation measures presented in this EIR clearly identify requirements, performance standards, timing, and monitoring for the implementation of each measure either by the County or by individual applicants for housing development under the proposed Project, and requires that mitigation be implemented prior to future development of housing projects.

Comment Response I.105-14

The comment asserts that there are several mitigation measures that the EIR fails to consider or implement to reduce potentially significant impacts of the proposed Project. With regard to measures

identified by the commenter addressing construction timing, pre-construction surveys, construction monitoring, compensatory replacement of affected habitat, and establishment of buffers, **MM BIO-1** and **MM BIO-2** already include these types of measures. For example, **MM BIO-2** requires that applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval an HPP. The HPP shall be prepared by a biologist approved by County P&D. The HPP shall first determine the presence of sensitive biological resources at a project site, including special-status species and their habitats, ESH, Riparian Corridors, wetlands, and other sensitive natural communities. If the biologist finds that there are no potential sensitive biological resources at the project site, they shall submit a memorandum describing these findings to County P&D for review. If resources are present, the HPP shall determine whether avoidance, minimization, or compensatory measures are necessary. Measures for avoidance and/or minimization identified in **MM BIO-2** include requirement that if any ground disturbance occurs during the nesting bird season, the HPP shall include requirements for nesting bird surveys and continuous monitoring.

With regard to suggested requirement for 600-foot buffers from protected wetlands, **MM BIO-2** requires a minimum 100-foot from sensitive habitats, watercourses, and/or riparian habitats in compliance with the County's development standards of the LUDC and CZO. The County considers these buffers suitable for the protection of sensitive habitats, watercourses, or riparian habitats, and greater buffer distances are not considered necessary to reduce impacts in compliance with County standards and regulations. It should also be noted that as described in the impact analysis, future housing development projects may be subject to compliance with existing regulations addressing impacts to sensitive resources, including but not limited to the requirements and development standards of 35.28.100 of the LUDC which provide restrictions on development within the Environmentally Sensitive Habitat (ESH) Overlay.

With regard to suggested mitigation measures addressing pest control, window collision, road mortality, and requirement for funding of wildlife rehabilitation facilities, based on the analysis presented in Section 3.4, *Biological Resources,* such measures are not considered necessary to reduce potential impacts of the Project. Potential adverse impacts to sensitive wildlife species and resources are thoroughly discussed under Impact BIO-2 and Impact BIO-4, while cumulative impacts are discussed in Section 3.4.4.3, *Cumulative Impacts.* Impacts associated with the use of common pesticides and other potentially hazardous substances typical for residential development are addressed in Section 3.8, *Hazards and Hazardous Materials.*

With regard to suggested mitigation measures requiring native plant landscaping, **MM BIO-2** has been revised to require that for housing projects located adjacent to sensitive habitats, watercourses, or riparian habitats, the project shall be landscaped with only native, non-invasive, or compatible species to the adjacent habitat.

Comment Response I.105-15

The comment asserts that the EIR fails to identify and address site-specific transportation impacts. The comment letter references findings provided in an independent peer review of the EIR's transportation analysis and which is included as an exhibit to the comment letter. However, as previously discussed in prior responses to comments, the EIR provides a programmatic analysis of impacts as site-specific analysis of individual rezone sites is not feasible. Programmatic impacts to transportation and mitigation measures necessary to reduce impacts based upon the whole of the

Project, including buildout of the housing sites inventory, is presented in Section 3.14, *Transportation* as well as the *Vehicle Miles Traveled Impact Analysis Report* prepared by Fehr & Peers for the proposed Project and presented in Appendix F. Please refer to Master Response 2 and Comment Response I.105-1 above.

While the County's *Environmental Thresholds and Guidelines Manual* include screening criteria for assessing project-level VMT impacts, as discussed in Section 3.14, *Transportation* and the *Vehicles Miles Traveled Analysis Report,* the Housing Element Update is a countywide plan and as such cannot be screened out and a VMT analysis is required. The analysis of VMT for the proposed Project is based on the County's VMT thresholds of significance and analysis methodology outlined in the County's *Environmental Thresholds and Guidelines Manual* which are informed by the Transportation Analysis Updates in Santa Barbara County (2020) technical report and based on the Office of Planning and Research's (OPR's) Technical Advisory on Evaluating Transportation Impacts in CEQA (2018). Guidance is provided for project-level analysis addressing several broad land use types that account for a majority of development projects in the county, as well as land use plans and programs. For the Housing Element Update, which is a land use plan, the County applies the same thresholds that are used for land use projects. For a land use project or plan, a VMT impact would occur if the plan's generated total VMT per service population exceeds a level of 15 percent below existing total VMT per service population in the county.

Comment Response I.105-16

The comment asserts that the EIR fails to analyze indoor air quality impacts resulting from exposure of future residents to air pollutants, particularly from exposure to formaldehyde off-gassing from buildings materials that would exceed SBCAPCD's CEQA significance thresholds for airborne cancer risk. The comment letter references findings provided in an independent peer review of the EIR's air quality analysis and which is included as an exhibit to the comment letter. The comment recommends several mitigation measures be included in the EIR to address these impacts, including requiring the use of no-added-formaldehyde composite wood products and requiring air ventilation systems which would reduce formaldehyde levels.

Although health effects of a project on the environment may be included in the CEQA analysis, evidence of health impacts that do not contribute to or are not caused by physical impacts on the environment are beyond the scope of CEQA. Because the comment pertains to potential indoor air quality impacts resulting from the speculative use of formaldehyde-containing building products in the future construction of new residential development enabled by the Project and which are currently regulated under the CARB Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products (Formaldehyde ATCM) (California Code of Regulations, Title 17, Sections 93120-93120.12), analysis of subsequent impacts imposed on the project are outside the scope of this Program EIR. As such, analysis of potential health impacts from formaldehyde exposure to future residents and the incorporation of recommended mitigation measures is not required.

Comment Response I.105-17

The comment asserts that the EIR's alternatives analysis is flawed and violates CEQA because the analysis does not appropriately weigh impacts to aesthetic and visual resources, agricultural resources, and biological resources. The comment also asserts that the alternatives analysis is deficient due to the EIR's asserted inadequate analysis of site-specific impacts related to Rezone Site

No. 11 (Glen Annie). Please refer to Comment Response I.105-1 above for detailed discussion and response to comments pertaining to the EIR's analysis of project or site-specific impacts.

With regard to the analysis presented in Chapter 4, *Alternatives Analysis,* and the consideration of impacts to aesthetics and visual resources, agricultural resources, and biological resources, please refer to Comment Responses I.105-5, I.105-6, and I.105-11 through I.105-14 above. As described in Chapter 4, *Alternatives Analysis,* CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project that would avoid or substantially reduce the significant impacts while accomplishing all or most of the project objectives. CEQA Guidelines Section 15126.6 further states that an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. Within the analysis of each alternative, the EIR presents analysis of the impacts resulting from implementation of each alternative and compares impacts to those of the proposed Project, consistent with the requirements of CEQA Guidelines Section 15126.6. For instance, in each alternative analysis, the discussion of impacts to agricultural and biological resources compares the difference in acreage affected resources under the alternative to the proposed Project; however, it is not the purpose of nor is necessary for the alternatives analysis to present exhaustive, detailed analysis of specific impacts of a project, particularly for a programmatic EIR which assesses impacts of a broad land use plan. Pursuant to CEQA Guidelines Section 15126.6(d), if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

It should be noted that in the analysis of potential alternatives to the proposed Project, the EIR includes consideration of three alternatives which would eliminate Rezone Site No. 11 (Glen Annie) from consideration. These include the Removal of Potential Glen Annie and South Patterson Agricultural Area Rezone Sites Alternative, which has been discarded from further consideration due to infeasibility of the alternative, and Alternative 2 – Sustainability Communities Strategy Alternative and Alternative 4 – Reduced Project B Alternative. However, in determining the Environmentally Superior Alternative, Alternative 3 was determined to be the Environmentally Superior Alternative due in part to the fact that this alternative would preserve urban agriculture to the maximum extent while still meeting the County's RHNA plus the 15 percent buffer for lower- to moderate-income units. In addition, elimination of Rezone Site Nos. 2-7 was found to substantially reduce impacts to aesthetics and visual resources, loss or conversion of agricultural resources, hazards and hazardous materials (ALUCP Safety Zones), noise (operational roadway noise and airport noise compatibility), and utilities and water supply (solid waste). This alternative would also result in incremental reductions in impacts to other resource areas including air quality (operational), energy, GHG emissions, groundwater (Goleta Groundwater and Santa Maria River Valley basins), population and housing, and public services and recreation.

Alamilla, Breanna

From: Steve Brown <SBrown@radiusgroup.com>
Sent: Friday, February 9, 2024 4:35 PM
To: PAD LRP Housing Element
Subject: Red Tail Development, Carpinteria

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please vote NO on this development. It will overwhelm the area and adversely impact the Casitas Village condominiums from a traffic, parking, safety and view perspective with little or no input from the adjacent community. The development is too large, the heights proposed are too high for this location which is serviced by limited roads and public services. I.106-1

Again, please vote NO.

Steve

Steve Brown, Principal
DRE# 00461986
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226 E. De la Guerra., Suite 100 | Santa Barbara, CA 93101
sbrown@radiusgroup.com | radiusgroup.com

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Comment Letter I.106 – [Steve Brown]

Comment Response I.106-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]) due to issues related to traffic, parking, safety, and views. Potential impacts related to transportation are addressed in Section 3.14, *Transportation* and potential impacts to scenic vistas are addressed in Section 3.1, *Aesthetics and Visual Resources*.

Please also refer to Master Response 5.

Alamilla, Breanna

From: Tristine Rainer <tristine@storyhelp.com>
Sent: Friday, February 9, 2024 9:33 AM
To: PAD LRP Housing Element
Subject: No on rezoning for Redtail development

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisors of Santa Barbara County,

I.107-1

It would be unconscionable for you to rezone the farm lot adjacent to Casitas Village, Carpinteria.

Please take note that the Orange County developer has an **F** rating from the **Better Business Bureau** because of it horrific management of its properties. https://www.bbb.org/us/ca/irvine/profile/property-management/red-tail-residential-1126-1000102770

Please read the complaints from tenants at the apartment complexes they have built that include roaches, mold, crime, drugs being used in the hallways, crime, unreturned tenant deposits, neglect and abuse from managers.

Is this really a business you want to bring to Santa Barbara county? If you do not your research about the company before your vote you will be in dereliction of your responsibility to the citizens of Santa Barbara county.

This is already the most densely populated area in Carpinteria, and the increased apartment density would increase crime. While it is true that density does not necessarily increase crime that is only the case if the development is designed with crime reduction in mind. This Redtail apartment complex with separate areas for market rate housing and for unhoused/worker housing seem to be designed to create conflicts, and given the F rating of the company that will manage it, you will be bringing a future slum to the county if you enable the Redtail development.
Sincerely,
Tristine Rainer

Comment Letter I.107 – [Tristine Rainer]

Comment Response I.107-1

The comment expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]). Please refer to Master Response 5.

The comment also expresses concerns regarding complaints from the developer's past tenants as well as concerns about potential increases in crime. While these comments do not pertain to the adequacy of the environmental impact analysis provided in the EIR, they have been noted and will be forwarded to County decision makers for their consideration.

9.5.4 Verbal Comments

Verbal Comment V.1 – [Marrel Brooks, Citizens Planning Association]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT NORTH COUNTY PUBLIC HEARING

DATE: January 17, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Marrel Brooks (Citizens Planning Association)

- Is there a map of the builders remedy project? (V.1-1)
- Outside of Santa Barbara County have any builder's remedy projects been approved? What about some of the jurisdictions that are facing lawsuits? (V.1-2)

Verbal Comment V.1 – [Marrel Brooks, Citizens Planning Association]

Comment Response V.1-1

The County has released two housing simulations, one for the South Coast and one for the North County, referred to as the Balancing Act Housing Simulation tool, that allows users to select from potential rezone sites to create a housing plan consistent with State requirements. The County has updated the Balancing Act Housing Simulation tool to depict all pending builder's remedy project applications within the unincorporated area of the county and which were submitted between February 15, 2023 and January 22, 2024. The Balancing Act Housing Simulation tool is accessible on the County's Housing Element Update Project website at: https://www.countyofsb.org/3177/Housing-Element-Update.

Comment Response V.1-2

Numerous builder's remedy project applications have been submitted in various jurisdictions throughout the State. The status of these applications is being tracked and processed by each applicable jurisdiction.

Verbal Comment V.2 – [Linda Honikman]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT NORTH COUNTY PUBLIC HEARING

DATE: January 17, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Linda Honikman

- Was just attending to preview the presentation for South Coast, and has interested in impacts to prime soils and agricultural lands (V.2-1)

Verbal Comment V.2 – [Linda Honikman]

Comment Response V.2-1

These comments have been noted and will be forwarded to County decision makers for their consideration. Detailed discussion of potential impacts associated with the loss of prime soils, conversion of agricultural lands, and potential agricultural zoning conflicts are discussed in Section 3.2, *Agricultural Resources.*

Verbal Comment V.3 – [Kendra Duncan O'Connor]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT NORTH COUNTY PUBLIC HEARING

DATE: January 17, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Kendra Duncan O'Connor

- We have heard a lot about the Sustainable Communities Strategy Alternative, why was this alternative not selected? (V.3-1)

Verbal Comment V.3 – [Kendra Duncan O'Connor]

Comment Response V.3-1

Detailed discussion and analysis of Alternative 2 – Sustainable Communities Strategy Alternative is presented in Chapter 4, *Alternatives Analysis.* As discussed therein in Section 4.6, *Identification of Environmentally Superior Alternative,* the Sustainable Communities Strategy Alternative would concentrate new high-density and affordable housing development in a designated HQTC and near existing services, including transit and active transportation facilities. This would target housing opportunities, especially higher-density, multifamily, affordable housing, in existing urban communities in the South Coast and Santa Maria Valley, which are the most VMT-efficient regions in the county. In contrast to the proposed Project, the Sustainable Communities Strategy Alternative would consolidate housing away from regions that are not VMT-efficient and do not provide as many jobs or services. This alternative would attain most Project Objectives by focusing new housing in urban infill in existing communities that are in proximity to services, which would also support key regional goals and policies related to improving the jobs-to-housing balance, reducing VMT and associated mobile-source air quality and GHG emissions, and encouraging transit-oriented communities. As described in Table 4-20, this alternative would also have the potential to result in greater impacts related to the increased potential exposure to airport noise, public services, and recreation compared to the proposed Project. The Sustainable Communities Strategy Alternative would substantially reduce impacts on agricultural resources, hydrology and water quality (Goleta Groundwater and Santa Maria River Valley basins), and wildfire and incrementally reduce impacts on other resource areas including aesthetics and visual resources (in the Rural Area), air quality (operational), GHG emissions, land use and planning, transportation, and utilities and water supply. However, the Sustainable Communities Strategy Alternative would not reduce or avoid potentially significant impacts to the same degree as Alternative 3 – Reduced Project A Alternative. When taken together and compared against the other alternatives considered for analysis, the Reduced Project A Alternative makes the most sizeable reduction in physical environmental impacts and, therefore, would be the environmentally superior alternative to the proposed Project.

Verbal Comment V.4 – [Michael Lozeau, Lozeau Drury LLP, Glen Annie Canyon Ranch]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Michael Lozeau (Lozeau Drury LLP, Glen Annie Canyon Ranch)

- The Ranch objects to the rezoning of the Glen Annie Golf Course (V.4-1)
- The Program EIR needs to analyze the whole of the proposed Project, including direct and indirect impacts (V.4-2)
- The Program EIR should have evaluated probable development scenarios for each of the potential rezone sites. The Draft EIR proposes up to 2,673 housing units at the golf course, but does not identify a probable development or describe the existing setting for the 96 acre site (V.4-3)
    - Instead, the Program EIR only provides abstract examples in the EIR
    - This isn't appropriate, particularly for the golf course
    - There likely won't be a project level EIR or a robust CEQA process that allows for public involvement for the future project at the golf course (e.g., maybe only a CEQA Exemption at most)
    - It is important to identify the impacts now
- Development of the golf course could result in impacts to biological resources that are not disclosed) (V.4-4)
    - The existing setting is not described for the site and no one would be able to understand the amount and quality of biological resources on the golf course
    - Development of the site would destroy wildlife habitat and would create barriers to wildlife movement
- There is already an EIR for the golf course that was prepared in 1991 (V.4-5)
    - The EIR for the golf course identified enforceable mitigation measures, which the County must implement
    - Those mitigation measures should be discussed, including if they are no longer feasible

- The County should update the Project Description and recirculate the Draft Program EIR (V.4-6)
- The alternatives analysis is flawed (V.4-7)
    - The analysis understates the difference in VMT impacts for the alternatives that do not include the golf course
    - The analysis also underplays VMT impacts in the Downtown
    - The alternatives analysis should address consistency with State and local policies, including County Comprehensive Plan policies that direct development toward Downtown areas

Verbal Comment V.4 – [Michael Lozeau, Lozeau Drury LLP, Glen Annie Canyon Ranch]

Comment Response V.4-1

For comments expressing general opposition to the selection of Rezone Site No. 11 (Glen Annie), please refer to Master Response 2.

Comment Response V.4-2

As described in Section 1.*3, Program-Level EIR Analysis,* this EIR has been prepared pursuant to the requirements of CEQA Guidelines Section 15168, which clarify that a program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways. Please refer to Section 1.3, *Program-Level EIR Analysis* for a description of why this program-level analysis for the proposed Project is appropriate in this EIR. Consistent with these guidelines, this Program EIR evaluates the proposed Project as a whole. That is, the potential impacts associated with future housing development enabled under the Housing Element Update are analyzed based on information available to the County where reasonably foreseeable, direct, and indirect physical changes in the environment could occur programmatically. This Program EIR does not focus on any specific projects that may be implemented pursuant to the Housing Element Update. Instead, the analysis is informed by the sites inventory prepared by the County to estimate the total housing that could occur under the proposed Project, including the Potential Rezone Program, during the current 8-year housing cycle (2023-2031). This approach allows the Board of Supervisors to consider broad implications and impacts associated with the proposed Project while not requiring a detailed evaluation of individual properties.

Some future projects may require more detailed environmental review pursuant to CEQA during the County permit process. In accordance with CEQA Guidelines Section 15168, the programmatic analysis and findings of this Program EIR may be incorporated by reference in subsequent environmental documents to describe regional settings, general effects, cumulative impacts, and other factors that may apply to individual housing development projects that implement the Housing Element Update.

Comment Response V.4-3

The EIR provides detailed discussion and reasoning for the assumptions and worst case development scenarios for which environmental impacts of the Project are based upon. Specifically, Chapter 3, *Environmental Impact Analysis,* presents detailed discussion of the assumptions utilized for this EIR analysis. As described therein, this Program EIR evaluates the proposed Project as a whole and considers the maximum potential buildout capacity scenario of the sites inventory, including all potential land use and zoning amendments identified in the Housing Element Update's programs and its sites inventory. Specifically, the EIR analyzes the potential buildout of the County's sites inventory considering the County's existing zoning regulations, proposed zoning changes, and potential density bonuses afforded for housing projects qualifying for the State Density Bonus Law (SDBL). As a result, the maximum potential buildout scenario estimates that substantially more housing could be

developed under the proposed Project than estimated in the Housing Element Update's sites inventory. Detailed information regarding the maximum potential buildout scenario for Rezone Site No. 11 (Glen Annie), assumes a maximum of 2,600 multi-family residential units and 73 single-family dwelling units (refer also to Appendix B). These buildout assumptions represent a maximum worst-case development scenario for this site, as well as all other sites identified in the sites inventory and the whole of the proposed Project, and the EIR provides a detailed programmatic analysis of potential impacts based on this worst-case development scenario. Where necessary, the EIR presents feasible programmatic mitigation measures which would apply to reduce impacts to the maximum extent feasible. The EIR also fully discloses in relevant discussions through this EIR where mitigation of impacts is considered infeasible. As such, no further edits or modifications to the EIR to sufficiently address potential impacts of the Project are warranted.

As previously described, due to the nature of the proposed Project, this EIR has been prepared pursuant to CEQA Guidelines Section 15168 and the standards for the preparation and use of a program EIR. Absence of site-specific analysis which is not feasible for this program EIR due to lack of site-specific details and uncertainties surrounding future site development, construction specifications, and project-specific design features, does not make this EIR and its analysis insufficient.

Comment Response V.4-4

Impacts associated with potential adverse effects to special-status species, sensitive habitats, protected wetlands, wildlife movement, and conflicts with adopted plans and policies addressing biological resources are thoroughly discussed and analyzed in Section 3.4, *Biological Resources*. The EIR provides a detailed regional discussion and summary of the potential biological resources that could be impacted by the proposed Project, including the list of special-status species (refer to Appendix D for a detailed list) and known sensitive habitats that occur within the Project area. Impacts to biological resources are assessed programmatically by evaluating impacts related to potential development of full buildout of the Project (see Section 3.0.3, *Impact Assessment Methodology* for a description of Project buildout). These buildout assumptions factor in the assumed maximum buildout scenario described in Chapter 3, *Environmental Impact Analysis* for all sites identified within the sites inventory, including for Rezone Site No. 11 (Glen Annie). While the EIR cannot feasibly provide a site-specific analysis of the existing environmental setting for each individual housing site or site-specific analysis of impacts associated with development of each site, the EIR identifies feasible mitigation to address site-specific impacts to the extent feasible, including for biological resources (see Section 3.4.4.4, *Proposed Mitigation*). Detailed site-specific evaluation of each applicable site required as part of these measures, including Rezone Site No. 11 (Glen Annie), is recognized in the EIR as necessary to address site-specific impacts; however, even with mitigation, the EIR concludes impacts would programmatically remain significant and unavoidable.

As previously described, due to the nature of the proposed Project, this EIR has been prepared pursuant to CEQA Guidelines Section 15168 and the standards for the preparation and use of a program EIR. Absence of site-specific analysis which is not feasible for this Program EIR due to lack of site-specific details and uncertainties surrounding future site development, construction specifications, and project-specific design features, does not make this EIR and its analysis insufficient.

Comment Response V.4-5

With regard to comments pertaining to the 1993 Glen Annie Golf Course EIR, as well as the Glen Annie Golf Course Conditional Use Permit and Conditions of Approval, it is important to note that the conditions of approval and mitigation measures required for the Glen Annie Golf Course as required by the 1993 Glen Annie Golf Course EIR were adopted and implemented specifically for development and operation of the existing golf course facilities. These conditions and mitigation measures would not be applicable to future development of the Rezone Site No. 11 (Glen Annie) as assumed in this EIR. However, as stated in Comment Response V.4-2 some projects may require future environmental review pursuant to CEQA in which appropriate mitigation measures would be identified for an applicable site, as necessary.

Comment Response V.4-6

The comment does not provide specific information or details to support revisions to Chapter 2, *Project Description,* or recirculation of the Draft EIR. As noted in comment responses above, the EIR provides a thorough, programmatic analysis of potential impacts associated with the proposed Project consistent with the requirements of the CEQA Guidelines, the County's *Guidelines for the Implementation of CEQA* (2020), and the County's *Environmental Thresholds and Guidelines Manual* (2021). None of the comments provided on the Draft EIR meet the CEQA or County criteria for recirculation of the EIR.

Comment Response V.4-7

As described in Chapter 4, *Alternatives Analysis,* the EIR presents the impacts resulting from implementation of each alternative and compares impacts to those of the proposed Project, consistent with the requirements of CEQA Guidelines Section 15126.6. For instance, in each alternative analysis, the discussion of impacts to transportation compares the VMT estimates calculated for each alternative's modified site inventory to the proposed Project; however, it is not the purpose of nor is it necessary for the alternatives analysis to present exhaustive, detailed analysis of specific impacts of a site, particularly for a program EIR which assesses impacts of a broad land use plan. Pursuant to CEQA Guidelines Section 15126.6(d), if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. Consistent with these guidelines, the EIR provides discussion of potential impacts consistency with plans, policies, and programs, where one of the EIR's alternatives would result in a meaningful change in impacts compared to the proposed Project.

For instance, to better align with the Connected 2050 RTP/SCS and the SB 375 targets, the EIR includes consideration and analysis of Alternative 2 – Sustainable Communities Strategy Alternative, which would concentrate new high-density and affordable housing development in a designated HQTC and near existing services, including transit and active transportation facilities. This would target housing opportunities, especially higher-density, multifamily, affordable housing, in existing urban communities in the South Coast and Santa Maria Valley, which are the most VMT-efficient regions in the county. In contrast to the proposed Project, the Sustainable Communities Strategy Alternative would consolidate housing away from regions that are not VMT-efficient and do not provide as many jobs or services. This alternative would attain most Project Objectives by focusing new housing in urban infill in existing communities that are in proximity to services, which would also support key regional goals and policies related to improving the jobs-to-housing balance,

reducing VMT and associated mobile-source air quality and GHG emissions, and encouraging transit-oriented communities. Further, as discussed in the *Land Use* discussion in Section 4.5.2, *Alternative 2 – Sustainable Communities Strategy,* the Sustainable Communities Strategy Alternative would be substantially more consistent with SB 375, SBCAG's Connected 2050 RTP/SCS, and the County's ATP, which all prioritize housing in VMT-efficient regions of the county. As an example, Policy EGV-4.1 of the Eastern Goleta Valley Community Plan includes similar standards to ensure that new development complements existing development and enhances aesthetics and viewsheds. The elimination of Rezone Site No. 11 (Glen Annie) would reduce potential policy inconsistencies associated with large-scale development in a natural, highly visible area in the Rural Area.

Verbal Comment V.5 – [Betty Jeppesen]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Betty Jeppesen

- Speaking against P1-BR (Bailard Site), a 176-unit complex which is being proposed in Carpinteria by Red Tail Development out of Florida (V.5-1)
    - The project site consists of agricultural land
    - The developer previously submitted an application to the City of Carpinteria
    - There is only one driveway associated with the site and the City already rejected the development of a second driveway exiting onto Bailard Avenue
    - Now the developer is submitting an application to the County
    - Casitas Village (a 260-unit complex) and a larger complex located across the street already cause street parking issues
    - The proposed units would be three stories tall
    - There is no method for getting people out during a fire
    - The proposed project would change the site from an agricultural area that has been that way for over 150 years
    - The site is located in a rural, farmland area

Verbal Comment V.5 – [Betty Jeppesen]

Comment Response V.5-1

With regard to comments expresses opposition to the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]), please refer to Master Response 5.

Verbal Comment V.6 – [Linda Honikman]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Linda Honikman

- Is the letter that the County received on January 22 the same as "getting certification for the Housing Element Update"? (V.6-1)
- Can we talk about the analysis with regard to how/when builders remedies were decided? (V.6-2)

Verbal Comment V.6 – [Linda Honikman]

Comment Response V.6-1

The County Board of Supervisors adopted the 2023-2031 Housing Element Update on December 5, 2023 and submitted the final Housing Element Update to the State Department of Housing and Community Development (State HCD) for final review. On January 22, 2024, State HCD submitted a letter notifying the County that the State has found the 2023-2031 Housing Element Update to be in substantial compliance with State law.

Comment Response V.6-2

With regard to consideration and treatment of builder's remedy project applications, please refer to Master Response 4.

Verbal Comment V.7 – [Cindy]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Cindy

- Here to oppose the Red Tail development at the end of Bailard and Carpinteria Avenue (Bailard Site) (V.7-1)
    - The proposed site is an organic farm
    - Having just one entry/exit to the site would endanger the people that live there
    - Even though Red Tail has said they'll have enough parking, people park on the street and Red Tail cannot control the number of cars or visitors
    - The condos at Casitas Village and the condos across the street already cannot control parking
- Is the Bailard Avenue project a builder's remedy project? (V.7-1)
- Could Red Tail use part of Casitas Village for development? (V.7-1)

Verbal Comment V.7 – [Cindy]

Comment Response V.7-1

For comments concerning the pending builder's remedy project application for the Bailard Avenue development (proposed at Pending Project No. 37 [Bailard]), please refer to Master Response 5.

Verbal Comment V.8 – [Christy Waldon]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Christy Walson

- Speaking against development of Hazard Family Property, a 2-acre site that includes two homes built in 1885 (V.8-1)
- The demolition of these two homes and construction of 500+ units is an inappropriate use of that area (V.8-1)

Verbal Comment V.8 – [Christy Waldon]

Comment Response V.8-1

The project referenced by the commenter is located within the City of Santa Barbara and is not part of the County's purview or scope of the proposed Project. Comments relating to housing sites identified in the City of Santa Barbara's Housing Element Update and builder's remedy projects located within the City of Santa Barbara should be directed to the City of Santa Barbara.

Verbal Comment V.9 – [Craig Gensler]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Craig Gensler

- Agrees with what Mike Lozeau had said previously (V.9-1)
    - The report does not seem to care about animals
- Why does the Glen Annie Golf Course require mitigation measures, but the development of housing does not? (V.9-2)
- Do they have a builder's remedy for golf course? (V.9-3)
    - Can anyone submit a builder's remedy application?
- The basin at the golf course has previously protected children at the high school for fires (V.9-4)
- How does the RHNA get determined? (V.9-5)
    - If we don't meet the RHNA then the State can have more say on what the local jurisdiction can develop?
    - How does the State have this authority? The State is essentially requiring that everyone becomes like Los Angeles and San Fransisco and develop all spare land.
- Are there certain lawmakers in the State that we can shine a light on for this? (V.9-6)
- Is traffic analysis part of the Program EIR? (V.9-7)

Verbal Comment V.9 – [Craig Gensler]

Comment Response V.9-1

Impacts associated with potential adverse effects to special-status species, sensitive habitats, protected wetlands, wildlife movement, and conflicts with adopted plans and policies addressing biological resources are thoroughly discussed and analyzed in Section 3.4, *Biological Resources*. The EIR provides detailed regional discussion and summary of the potential biological resources that could be impacted by the proposed Project, including the list of special-status species (refer to Appendix D for a detailed list) and known sensitive habitats that occur within the Project area. Impacts to biological resources are assessed programmatically by evaluating impacts related to potential development of full buildout of the Project (see Section 3.0.3, *Impact Assessment Methodology* for a description of Project buildout). These buildout assumptions factor in the assumed maximum buildout scenario described in Chapter 3, *Environmental Impact Analysis* for all sites identified within the sites inventory, including for Rezone Site No. 11 (Glen Annie). While the EIR cannot feasibly provide a site-specific analysis of the existing environmental setting for each individual housing site or site-specific analysis of impacts associated with development of each site, the EIR identifies feasible mitigation to address site-specific impacts to the extent feasible, including for biological resources (see Section 3.4.4.4, *Proposed Mitigation*).

Due to the nature of the proposed Project, this EIR has been prepared pursuant to CEQA Guidelines Section 15168 and the standards for the preparation and use of a program EIR.

Comment Response V.9-2

With regard to comments pertaining to the 1993 Glen Annie Golf Course EIR, as well as the Glen Annie Golf Course Conditional Use Permit and Conditions of Approval, it is important to note that the conditions of approval and mitigation measures required for the Glen Annie Golf Course as required by the 1993 Glen Annie Golf Course EIR were adopted and implemented specifically for development and operation of the existing golf course facilities. These conditions and mitigation measures would not be applicable to future development of the Rezone Site No. 11 (Glen Annie) as assumed in this EIR. However, as described above, while the EIR cannot feasibly provide a site-specific analysis of the existing environmental setting for each individual housing site or site-specific analysis of impacts associated with development of each site, the EIR identifies feasible mitigation to address site-specific impacts to the extent feasible, including for biological resources (see Section 3.4.4.4, *Proposed Mitigation*).

Comment Response V.9-3

With regard to consideration and treatment of builder's remedy project applications, please refer to Master Response 4. The County has not received any builder's remedy project applications for Rezone Site No. 11 (Glen Annie). The County has updated the Balancing Act Housing Simulation tool to depict all pending builder's remedy project applications within the unincorporated area of the county and which were submitted between February 15, 2023 and January 22, 2024. The Balancing Act Housing Simulation tool is accessible on the County's Housing Element Update Project website at: https://www.countyofsb.org/3177/Housing-Element-Update.

Comment Response V.9-4

This comment has been noted. Discussion and analysis of impacts related to wildlife hazards is presented in Section 3.16, *Wildfire.*

Comment Response V.9-5

For detailed discussion regarding the process in which the RHNA is determined, please refer to Section 2.1.2, *Regional Housing Needs Allocation Process.*

Comment Response V.9-6

This comment does not address the proposed Project or comment on the adequacy of the EIR. This comment has been noted.

Comment Response V.9-7

Impacts associated with transportation and circulation are analyzed in Section 3.14, *Transportation;* however, as discussed therein, consistent with the requirements of SB 743, the CEQA Guidelines, and the County's *Environmental Thresholds and Guidelines Manual*, the discussion focuses on VMT, which measures the number of vehicle trips and their distances, rather than LOS, which measures roadway capacity, intersection operations, and traffic congestion.

Verbal Comment V.10 – [Peter Hunt]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Peter Hunt

- Many of the builder's remedy projects appear to propose the demolition of old buildings and the construction of new units, a portion of which are affordable (V.10-1)
    - If a project on 1 acre included the demolition and development of 20 new units, but there is enough room and water for more, could the developer just keep the old units and build the 20 new units too?

Verbal Comment V.10 – [Peter Hunt]

Comment Response V.10-1

This comment does not pertain to the project or EIR. These comments are noted and will be forwarded to County decision makers for their consideration.

Verbal Comment V.11 – [Laurel Perez, Suzanne Elledge Planning and Permitting Services, Inc.]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Laurel Perez, Suzanne Elledge Planning and Permitting Services, Inc.

- Can the Board certify the EIR if they are moving forward with a project that is not the Environmentally Superior Alternative? (V.11-1)

Verbal Comment V.11 – [Laurel Perez, Suzanne Elledge Planning and Permitting Services, Inc.]

Comment Response V.11-1

CEQA does not require that a Lead Agency adopt the Environmentally Superior Alternative in order to certify an EIR. CEQA Guidelines Section 15090(a) states that prior to approving a project (or alternative) the lead agency shall certify that:

1. The final EIR has been completed in compliance with CEQA
2. The final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and
3. The final EIR reflects the lead agency's independent judgement and analysis.

CEQA Guidelines Section 15091 requires that when a public agency approves or carries out a project or alternative for which an EIR has been certified and which identifies one or more significant environmental effects of the project or alternatives, the public agency must make one or more written findings for each of those significant effects, accompanied by a brief explanation for the rational for each finding.

CEQA Guidelines Section 15092(a) states that after considering the final EIR and in conjunction with making findings under CEQA Guidelines Section 15091, the lead agency may decide whether or how to approve or carry out the project, including approval or implementation of an alternative to the project.

Verbal Comment V.12 – [Kendra Duncan O'Connor]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Kendra Duncan O'Connor

- The theme of the Program EIR appears to be seems to be significant and unavoidable impacts (V.12-1)
- The Housing Element Update is not consistent with the Eastern Goleta Valley Plan (V.12-1)
- There are 10 sites that are located nowhere near transit or services (V.12-1)
- One site (identified as 100 percent affordable) is located in an area that supports wildlife and experiences airport noise and wildfire hazards (V.12-1)
    - The County is proposing to put people in airplane flight paths
    - Agricultural parcels identified in the Housing Element Update also have known archaeological resources
- The County has a lack of transparency (V.12-1)
    - States that the Glen Annie Golf Course site is going to be rezoned and the same is true for Georgi and St. Vicent
    - States the property owners bought the property with the greenlight for housing

Verbal Comment V.12 – [Kendra Duncan O'Connor]

Comment Response V.12-1

With regard to comments expressing opposition or concern for selection of rezone sites within the Goleta Valley and Eastern Goleta Valley, please refer to Master Response 2 and 3. These comments are noted and will be forwarded to County decision makers for their consideration.

Verbal Comment V.13 – [Amanda]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Amanda

- In agreement with the issues raised by Kendra (V.13-1)
- The Housing Element Update is proposing housing in areas where there are protected wildlife along creeks and in riparian zones (e.g., along Atascadero Creek and another creek along Patterson Avenue) (V.13-1)
    - These areas support hawks, owls, etc.
- These areas are also located within floodplains and are prone with wildfire hazards (V.13-1)
    - If there was a wildfire or tsunami there would be no way for to get people out
        - Just lost a home and a community in Lahaina; when you don't have adequate access to escape during a disaster it becomes a tragedy
        - Why would we put housing along a creek in a flood zone?
- There are also traffic issues along Patterson Avenue (V.13-1)
    - It takes 10 minutes to get from the light onto the freeway
    - Can't imagine what further development is going to do to the community
- The Housing Element Update could erase a local organic farm that supports the community (V.13-1)
    - This could add to the carbon footprint by removing a farm that employs people and further outsourcing food production
- Housing is also proposed in a flight path, which is dangerous (V.13-1)
- There is so much more land available for housing to the north (V.13-1)

Verbal Comment V.13 – [Amanda]

Comment Response V.13-1

With regard comments expressing opposition or concern for selection of rezone sites within the Goleta Valley and Eastern Goleta Valley, please refer to Master Response 2 and 3. These comments are noted and will be forwarded to County decision makers for their consideration.

Verbal Comment V.14 – [Frank Arredondo]

SANTA BARBARA COUNTY HOUSING ELEMENT UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SOUTH COAST PUBLIC HEARING

DATE: January 23, 2024

TIME: 5:00pm

Re: Santa Barbara County Housing Element Update Draft EIR

Frank Arredondo

- Previously commented on the City of Goleta's Housing Element Update on concerns about cultural resources (V.14-1)
    - The City of Goleta proposed rezoning 9 to 12 properties that were identified open space
        - If these are rezoned for housing, the developers can use SB 35, which permits housing development provided that at least 50 percent of the units are affordable
            - Now the requirement has been reduced to 10 to 20 percent affordability
            - Developers can use SB 35 any time
        - Most environmental review is completed based on the development plan
            - That process is driven by CEQA
        - We now have a bunch of properties that have never been developed
            - When SB 35 is utilized the application says "is there something there or not" regarding archaeological resources on vacant sites and the Applicant can just say no
            - The local jurisdiction cannot identify impacts using a programmatic document and projects should be evaluated at a site-specific level
- One of the mitigation measures (CTCR-5) indicates that if there is an incidental discovery the project is kicked back into consultation with the tribes (V.14-2)
    - Would this be informal consultation?
    - Consultation is supposed to begin when an application is submitted and is supposed to conclude before the application is approved
    - Maybe the language in the mitigation measure should be changed to "meet and confer"
        - The "what ifs" should already be solved before any incidental discoveries are made

Verbal Comment V.14 – [Frank Arredondo]

Comment Response V.14-1

With regard to comment concerning the City of Goleta's Housing Element Update, these comments do not directly pertain to the proposed Project or comment on the adequacy of the EIR. However, the EIR does include consideration of cumulative impacts to cultural and tribal cultural resources resulting from cumulative pending plans, programs, and projects, as described in Chapter 3, *Environmental Impact Analysis,* which includes the City of Goleta's Housing Element Update. For discussion of cumulative impacts to cultural and tribal cultural resources, please refer to Section 3.5.4.3, *Cumulative Impacts,* in Section 3.5, *Cultural and Tribal Cultural Resources.*

With regard to the analysis of site-specific impacts, please refer to Section 1.3, *Program-Level EIR Analysis.* As discussed therein, this EIR has been prepared pursuant to CEQA Guidelines Section 15168 and the standards for the preparation and use of a Program EIR. While the EIR cannot feasibly provide a site-specific analysis of the existing environmental setting for each individual housing site or site-specific analysis of impacts associated with the development of each site nor is it required to do so, the EIR identifies feasible mitigation to address future potential site impacts. With respect to cultural and tribal cultural resources, the EIR identifies **MM CTCR-1** and **MM CTCR-2**, which would require applications for multifamily housing projects that are proposed on County-owned sites and/or that are subject solely to ministerial review and approval and/or objective standards according to state housing law shall be required to include for County P&D approval site-specific plans and studies addressing impacts associated with future individual housing development projects.

Comment Response V.14-2

MM CTCR-5 presented in the Draft EIR has been removed due to overlapping requirements included as part of **MM CTCR-3 (Stop Work at Encounter)**, particularly the requirements for coordination with P&D immediately following the incidental discovery of archaeological, historic, or tribal cultural resources, and evaluation of significance of the resource(s) by a Native American representative in compliance with the provisions of state law and the County's adopted guidance. Given these overlapping requirements, elimination of **MM CTCR-5** does not change the findings or conclusions presented in the EIR. Where **MM CTCR-5** was identified to reduce impacts, appropriate discussions throughout the EIR have been revised to instead reference or identify **MM CTCR-3** as required to mitigate impacts in the event of incidental discovery of tribal cultural resources.