2030 Climate Action Plan

Draft Environmental Impact Report
State Clearinghouse Number: 2022110453

prepared by

County of Santa Barbara
Sustainability Division, Community Services Department
123 East Anapamu Street
Santa Barbara, California 93101
Contact: Garrett Wong, Climate Program Manager

prepared with the assistance of

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319 East Carrillo Street, Suite 105
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June 2023

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed 2030 Climate Action Plan (2030 CAP; Proposed 2030 CAP). This section summarizes the characteristics of the 2030 CAP, alternatives to the 2030 CAP, and the environmental impacts and mitigation measures associated with the 2030 CAP.

2030 CAP Synopsis

Lead Agency Contact Person

County of Santa Barbara
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Santa Barbara, California 93101

Contact: Garrett Wong, Climate Program Manager
(805) 390-2983

2030 CAP Description

This EIR has been prepared to examine the potential environmental effects of the 2030 CAP. The following is a summary of the full project description, which can be found in Section 2, *Project Description*.

2030 CAP Location

The 2030 CAP would update the County of Santa Barbara's (County) 2015 Energy and Climate Action Plan which is implemented across unincorporated Santa Barbara County, excluding lands under the jurisdiction of incorporated cities, the federal government (Los Padres National Forest and Vandenberg Space Force Base), and the University of California.

2030 CAP Overview

In 2018, the County of Santa Barbara adopted a goal of 50 percent net reduction from 2018 emissions levels by 2030, and carbon neutrality by 2045. To reach this goal, the County is proposing to update the 2015 Energy and Climate Action Plan. The 2030 CAP would include a community-wide greenhouse gas (GHG) emissions inventory and create climate action strategies to address issues related to improving building efficiency; decreasing transportation emissions; decreasing emissions related to water, wastewater, and solid waste; increasing carbon sequestration, creating food system improvements; and encouraging a low carbon economy. Climate action strategies within the 2030 CAP would be fulfilled through implementation of 2030 CAP Measures and Actions. A Measure is a long-range policy developed to achieve specific GHG reductions. An Action is a specific program or step that supports GHG reduction Measures. Adoption of the 2030 CAP would require accompanying amendments to the Energy Element and amendments to other components of the Santa Barbara County Comprehensive Plan as needed for consistency with 2030 CAP Measures and Actions.

Qualified Greenhouse Gas Emissions Reduction Plan

California Environmental Quality Act (CEQA) Guidelines Section 15183.5(b) stipulates that project-specific environmental documents can find that project-level GHG emissions would not be cumulatively considerable if the project complies with the requirements of a qualified GHG emissions reduction plan. The project-specific environmental document must identify those requirements in the GHG emissions reduction plan that applies to the project, and if they are not otherwise enforceable, must incorporate those requirements as project-specific mitigation measures. To meet the requirements of CEQA Guidelines Section 15183.5(b), a qualified GHG emissions reduction plan must do the following:

a. Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
b. Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
c. Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
d. Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
e. Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
f. Be adopted in a public process following environmental review.

The 2030 CAP would fulfill the requirements of a qualified greenhouse gas emissions reduction plan. The 2030 CAP includes a GHG emissions inventory, GHG emissions forecasts, and GHG emissions targets. The 2030 CAP provides specific GHG emission reduction Measures that collectively achieve the County's emissions targets and requires the County to conduct annual progress reporting for 2030 CAP implementation status. The 2030 CAP is a discretionary project which must undergo environmental review pursuant to CEQA, and is therefore subject to public review.

Programs, Policies, and New Development

The 2030 CAP does not identify individual site-specific projects that may result from implementing actions included in the 2030 CAP. However, the types of supportive programs, policies, financial pathways, and other commitments identified in the Actions included in the 2030 CAP are considered during review of the 2030 CAP. Such programs, policies, or potential new development would be aligned with the 2030 CAP Measures, included in Table ES-1.

Table ES-1 Santa Barbara County 2030 CAP GHG Emissions Reduction Measures List

Measure	Description
Building Energy Measures	
BE-1	Increase energy resilience in new and existing buildings
Transportation Measures	
TR-1	Increase the use of zero-emission vehicles
TR-2	Enhance transportation policy infrastructure planning
TR-3	Increase affordable housing and reduce number of commuter car trips
TR-4	Increase reliability and accessibility of transit services
TR-5	Reduce the need for commuting by encouraging work at home, walk to work and locating jobs near transit
TR-6	Decarbonize offroad emissions
Waste Measures	
W-1	Reduce food waste and increase use of organic recycled materials
W-2	Reduce use of non-recyclable and non-compostable single use items
Water and Wastewater Measures	
WW-1	Increase energy and carbon efficiency of water production treatment conveyance and use
Carbon Sequestration Measures	
CS-1	Facilitate carbon reduction through conservation and restoration of natural habitats and ecosystems and sequestration technologies
Food System Measures	
FS-1	Increase community food access equity and resilience
FS-2	Reduce energy- and carbon-intensity of the food system
Low Carbon Economy Measures	
LCE-1	Limit the increase of fossil-fuel extraction and develop a sunset strategy
LCE-2	Support local business in becoming more sustainable
Government Operations Measures	
GO-1	Increase sustainability and resilience of County-operated facilities

Source: 2030 CAP

Each of the 2030 CAP Measures are fulfilled through 2030 CAP Actions. 2030 CAP Actions identify the supportive programs, policies, financial pathways, and other commitments that assist in accomplishing these Measures. The types of infrastructure, improvements, and other new development facilitated by the 2030 CAP Actions includes, but is not limited to, the installation of electric vehicle charging stations; new bicycle or pedestrian facilities; upgrading existing infrastructure including electrical panels and branch circuits; the increase of sustainable agricultural practices such as expanding solar development on agricultural lands, increasing the use of compost, mulching, cover crops, and hedgerow planting; the restoration of natural habitats and ecosystems; and the development of new building policies to increase wildfire resilience. The 2030 CAP Actions promote programs or developments aligned with the 2030 CAP Measures which could introduce physical changes associated with construction and could alter pedestrian and vehicular traffic patterns. A full list of 2030 CAP Actions can be found within Table 2 of the 2030 CAP document.

Once adopted, the 2030 CAP would represent Santa Barbara County's approved emissions reduction program for all new development within unincorporated Santa Barbara. Future development projects in Santa Barbara County requiring discretionary approval would have the opportunity to

demonstrate consistency with the 2030 CAP if they are consistent with the 2030 CAP's GHG emissions reduction measures. Any project that is consistent with a qualified GHG emissions reduction plan, and that conforms to specific performance standards applicable to new development identified in the plan, would not require additional GHG emissions analysis or mitigation in accordance with CEQA Guidelines Section 15183.5(b). In addition, a project's incremental contribution to a cumulative impact may not be cumulatively considerable if the project would comply with the requirements in a previously approved plan or mitigation program (including plans or regulations for the reduction of GHG emissions) that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area in which the project is proposed. Future discretionary development projects found by the County to be consistent with the 2030 CAP could streamline GHG analysis in accordance with CEQA Guidelines Section 15183.5.

Infrastructure, improvements, and other new development facilitated by the 2030 CAP Actions requiring discretionary approval would be subject to environmental review in accordance with CEQA and individual impact analyses would identify required plan- or project-specific mitigation measures where applicable. However, 2030 CAP-related projects implemented to promote 2030 CAP Measures and Actions would have the opportunity to rely on the programmatic environmental review contained in the certified Program EIR for the 2030 CAP for project-level analysis.

Project Objectives

The objectives of the 2030 CAP are as follows:

- Quantify GHG emissions in Santa Barbara County in a GHG inventory.
- Provide a road map to achieve GHG reductions that meet the State's SB 32 reduction target of 40 percent below baseline emissions by 2030, with an aspirational goal to meet the County's GHG emissions reduction target goal of 50 percent below baseline emissions by 2030.
- Demonstrate a level of GHG emissions below which future projects covered by the 2030 CAP would not have a cumulatively considerable contribution to GHG impacts.
- Serve as a Qualified Greenhouse Gas Emissions Reduction Plan to provide CEQA streamlining for future development projects.

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the 2030 CAP. Studied alternatives are summarized below. Based on the alternatives analysis, Alternative 3 was determined to be the environmentally superior alternative.

- Alternative 1: No Project
- Alternative 2: Carbon Credit
- Alternative 3: Building Electrification

Alternative 1 (No Project) examines a scenario in which the County would not approve the 2030 CAP. Under such a scenario, none of the emissions reductions Measures or Actions outlined in the 2030 CAP would be implemented, and none of the benefits of the 2030 CAP would be realized. The County would continue to rely on implementation of GHG emissions reductions strategies within the 2015 Energy and Climate Action Plan, which would not achieve the State's goal of a 40 percent reduction in emissions from 1990 levels by 2030. The anticipated GHG emissions that would occur in

accordance with the No Project Alternative are generally described in the 2030 CAP's State-Adjusted forecast, which accounts for future growth in accordance with business-as-usual conditions, adjusting for implementation of existing State laws and programs that were implemented prior to the development of the 2030 CAP[1]. This alternative would not provide a clear pathway for the County to meet the State's emissions reduction goal.

Alternative 2 (Carbon Credit). Under this alternative, in lieu of adopting the 2030 CAP, the County would purchase carbon offsets to reduce GHG emissions. Carbon offset projects could increase or protect carbon sequestration, invest in solar or wind projects, improve water or energy efficiency, capture methane at animal farms or landfills, replace high-global warming-potential gas use with a gas that has a lower global warming potential, or implement other types of measures. To achieve the greatest environmental benefits to Santa Barbara County, priority would be given, from highest to lowest, to offsets purchased locally (within the County), regionally (within the Central Coast of California), within California, outside of California but within the Pacific Southwest (within Arizona, Hawaii, Utah, or Nevada), and elsewhere in the United States.

Alternative 3 (Building Electrification). The 2030 CAP includes Action CE-1.1 and Action CE-1.2 which requires the County to restrict natural gas infrastructure for new development and major remodels and complete an existing building electrification plan to identify the policies and programs needed to achieve the 2030 CAP goal to electrify 14 percent of existing buildings by 2030, respectively. The Building Electrification Alternative would revise these Actions to require the County to adopt a building electrification ordinance concurrently with adoption of the 2030 CAP which requires 100 percent building electrification by 2030. This would result in the complete and immediate restriction of all natural gas infrastructure rather than a restriction for only new development and major remodels. The Building Electrification Alternative would result in the complete electrification of buildings in Santa Barbara County within the timeframe of the 2030 CAP, substantially reducing GHG emissions resulting from the use of natural gas.

Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the 2030 CAP. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the County are summarized in Section 1, *Introduction*.

Issues to be Resolved

The County of Santa Barbara Board of Supervisors will need to adopt any CAP-related Comprehensive Plan amendments (e.g., amendments to the Energy Element) to be consistent with, and ensure the successful implementation of, certain features of the CAP. In addition to the actions set forth above, the Coastal Commission must certify any amendments to the Local Coastal Program (LCP) – including Article II, as the implementing ordinance of the LCP.

[1] The "business-as-usual" forecast assumes no action is taken to reduce GHG emissions in the County. 2018 emissions are projected forward using growth indicators such as population, housing, and employment.

Issues Not Studied in Detail in the Program EIR

Pursuant to *CEQA Guidelines* Section 15128, an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 notes such a statement may be contained in an attached copy of an Initial Study. The Environmental Scoping Document/Initial Study (Appendix A) prepared for the 2030 CAP and included as part of the NOP functions as an Initial Study for the 2030 CAP, pursuant to *CEQA Guidelines* Section 15128. The Environmental Scoping Document/Initial Study concludes there is no substantial evidence the 2030 CAP would have significant impacts on Aesthetics/Visual Resources, Agricultural Resources, Biological Resources, Cultural Resources, Fire Protection, Geologic Processes, Hazardous Materials/Risk of Upset, Land Use, Noise, Public Facilities, Recreation, or Water Resources/Flooding. For the complete analysis of these environmental issue areas, refer to Appendix A.

Summary of Impacts

Table ES-2 summarizes the environmental impacts of the 2030 CAP. Impacts are based on the following classifications:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The 2030 CAP would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-2 Summary of Environmental Impacts

Impact	Mitigation Measure (s)	Residual Impact
Air Quality		
Impact AQ-1. The 2030 CAP would not directly result in regional population growth or an increase in regional employment and would be consistent with the County's regional growth forecast, which is the basis for the 2022 Ozone Plan. This impact would be less than significant.	No mitigation measures are required.	Less than significant.
Impact AQ-2. Construction of 2030 CAP-related projects would comply with applicable SBCAPCD rules, which are designed to minimize construction emissions in the County. The 2030 CAP would implement Actions which would reduce long-term regional pollutant emissions associated with vehicle use, building use, and landfill operations. This impact would be less than significant.	No mitigation measures are required.	Less than significant.
Impact AQ-3. 2030 CAP-related projects could would result in small-scale construction activities, which may occur in proximity to sensitive receptors. Existing State regulations, SBCAPCD regulations, and project-specific environmental review would minimize the potential for sensitive receptors to be exposed to substantial pollutant concentrations. Implementation of the 2030 CAP would reduce long-term regional pollutant emissions and reduce the potential for existing sensitive receptors to be exposed to TAC concentrations. This impact would be less than significant.	No mitigation measures are required.	Less than significant.
Impact AQ-4. 2030 CAP-related projects would be subject to SBCAPCD regulations which would minimize the creation of odors during construction. The 2030 CAP would not result in or promote projects identified by SBCAPCD as having the potential to result in substantial odors. This impact would be less than significant.	No mitigation measures are required.	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
Energy		
Impact E-1. The 2030 CAP includes Measures and Actions that would promote energy efficiency in Santa Barbara County, consistent with existing energy policies. 2030 CAP-related projects requiring construction activities would consume energy resources; however, consumption of electricity and petroleum during construction would be temporary, and would be subject to applicable State regulations, which would minimize wasteful energy use. Therefore, this impact would be less than significant	No mitigation measures are required.	Less than significant.
Greenhouse Gas Emissions		
Impact GHG-1. Implementation of the 2030 CAP would result in substantial GHG reductions compared to the Business-As-Usual scenario and the scenario implementing only State GHG reduction laws. The 2030 CAP would reduce overall GHG emissions in the County, consistent with Statewide legislation (SB 32). This impact would be less than significant.	No mitigation measures are required.	Less than significant.
Impact GHG-2. The 2030 CAP would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHGs, as the 2030 CAP is a policy driven document intended to reduce GHGs. The 2030 CAP would achieve GHG reduction targets established by Senate Bill 32 and would include Measures and Actions promoting the goals of applicable plans, policies, and regulations, such as SBCAG's Connected 2050, Senate Bill 100, Innovative Clean Transit Regulations, the California Model Water Efficient Landscape Ordinance, Title 24 of the California Code of Regulations, and the County's Energy Element. Therefore, there would be no impact	No mitigation measures are required.	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
Transportation		
Impact TRA-1. The 2030 CAP would not conflict with the Santa Barbara County Association of Government's Connected 2050 RTP/SCS, the County's Circulation Element, or any other applicable program, plan, ordinance, or policy relevant to the transportation system. This impact would be less than significant.	No mitigation measures are required.	Less than significant.
Impact TRA-2. The 2030 CAP would implement specific Actions which would reduce VMT for residential, commercial, and industrial sectors throughout the County. The 2030 CAP would result in a reduction of countywide VMT. Therefore, the 2030 CAP would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). This impact would be less than significant.	No mitigation measures are required.	Less than significant.
Impact TRA-3. 2030 CAP-related projects would be required to adhere to applicable regulations to ensure emergency access is maintained, such as the California Department of Transportation's Manual of Uniform Traffic Control Devices, the County Code, and the access requirements of the applicable Fire Department. With adherence to applicable regulations, this impact would be less than significant.	No mitigation measures are required.	Less than significant.

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1 Introduction

This document is a Programmatic Environmental Impact Report (Program EIR) that identifies and describes potential environmental impacts associated with the 2030 Climate Action Plan (2030 CAP; Proposed 2030 CAP) proposed by the County of Santa Barbara (County). The 2030 CAP is an update of the 2015 Energy and Climate Action Plan, which was adopted by the County in May 2015.

This section discusses (1) the legal basis for preparing a Program EIR; (2) the lead, responsible, and trustee agencies; (3) the Program EIR background; (4) issue areas found not to be significant by the Environmental Scoping Document/Initial Study; (5) the content and format of the Program EIR; and (6) the environmental review process required under the California Environmental Quality Act (CEQA). The 2030 CAP is described in detail in Section 2, *Project Description*.

1.1 Purpose and Legal Authority

Section 21000 of the California Public Resources Code, commonly referred to as CEQA, requires the evaluation of environmental impacts associated with all planning programs or development projects proposed. As such, this Program EIR is an informational document for use by the County, other agencies, and the general public in their consideration and evaluation of the environmental consequences of implementing the 2030 CAP.

This document is a Program EIR. Section 15168(a) of the CEQA Guidelines states that:

> "A Program EIR is an EIR which 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 a chain of contemplated actions; (3) in connection with 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."

Section 15151 of the CEQA Guidelines provides the following standards related to the adequacy of an Environmental Impact Report:

> "An Environmental Impact Report should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure. "

Once a Program EIR has been prepared, subsequent activities under the program must be evaluated to determine what, if any, additional CEQA documentation needs to be prepared. If the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be in the Program EIR scope and additional environmental documents may not be required (CEQA Guidelines § 15168(c)). When a Program EIR is relied upon for a subsequent activity, the Lead Agency must incorporate feasible mitigation measures and

alternatives developed in the Program EIR into the subsequent activities (CEQA Guidelines Section 15168[c][3]). If a subsequent activity would have effects not addressed in the Program EIR, the Lead Agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or project-level EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis.

1.2 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* require the identification of "lead," "responsible," and "trustee" agencies. The County is the "lead agency" for the 2030 CAP because it has the principal responsibility for approving the 2030 CAP.

A "responsible agency" is a public agency other than the "lead agency" that has discretionary approval authority over certain components of a project (the *CEQA Guidelines* define a public agency as a State or local agency, but specifically exclude federal agencies from the definition). A "trustee agency" refers to a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California (for example, the California Department of Fish and Wildlife).

1.3 Program EIR Background

In compliance with the *CEQA Guidelines* (Sections 15063 and 15082), the County of Santa Barbara, as the Lead Agency responsible for the 2030 CAP, solicited preliminary public agency comments on the project through distribution of a Notice of Preparation (NOP) and receipt of public comments during the 2030 Climate Action Plan EIR Scoping Meeting held virtually on November 22, 2022. As part of the NOP, an Environmental Scoping Document/Initial Study was published which provides an evaluation of environmental issue areas which are not discussed further in this Program EIR (refer to Section 1.4). A copy of the Environmental Scoping Document/Initial Study is provided as Appendix A of this Program EIR.

The NOP was distributed to affected agencies and the public for the required 30-day period from November 18, 2022 to December 19, 2022. Table 1-1 summarizes the issues relevant to the Program EIR that were identified in the NOP comments received (one agency/four individuals) and the Program EIR sections where the issues are addressed. The NOP and NOP comments/letters received are included in Appendix B of this Program EIR.

Table 1-1 NOP Comments and Program EIR Response

Commenter	Comment/Request	How and Where It Was Addressed
Agency Comments		
Native American Heritage Commission	Assembly Bill (AB) 52 applies to any project to which as notice of preparation is filed on or after July 1, 2015. AB 52 has consultation requirements which must be met by the lead agency.	Comments are addressed in the Environmental Scoping Document for the 2030 Climate Action Plan, included as Appendix A of this Program EIR
Public Comments		
Michael Chiacos	State targets are 68% of new vehicle sales being ZEVs by 2030. However, the fleet takes more than a decade to turn over so the impact will be more modest than in 2040 and later when more fleet turnover has occurred.	Comments are addressed in Section 4.4, *Transportation and Traffic*.
Krista Pleiser, Santa Barbara Association of Realtors	Use of natural gas	Comments are addressed in Section 4.2, *Energy*
Summer Broeke-Smith, Geosyntec	How will CAP account for state legislation (e.g., electrification/NG phaseout)	Comments are addressed in Section 4.2, *Energy*
Nancy Emerson	Will this be a Program EIR? And will the Housing Element Update be considered in the EIR?	Comments are addressed in Subsection 1.1, *Purpose and Legal Authority*, in Section 1.0, *Introduction*

1.4 Issues Not Studied in Detail in the Program EIR

Pursuant to *CEQA Guidelines* Section 15128, an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 notes such a statement may be contained in an attached copy of an Initial Study. The Environmental Scoping Document/Initial Study (Appendix A) prepared for the 2030 CAP and included as part of the NOP functions as an Initial Study for the 2030 CAP, pursuant to *CEQA Guidelines* Section 15128. The Environmental Scoping Document/Initial Study concludes there is no substantial evidence the 2030 CAP would have significant impacts on Aesthetics/Visual Resources, Agricultural Resources, Biological Resources, Cultural Resources, Fire Protection, Geologic Processes, Hazardous Materials/Risk of Upset, Land Use, Noise, Public Facilities, Recreation, or Water Resources/Flooding. For the complete analysis of these environmental issue areas, refer to Appendix A.

1.5 Content and Format

This Program EIR has been organized into seven sections, which include:

1. **Introduction.** Provides the statement of purpose, project background, and information about the Program EIR content and format.
2. **Project Description.** Identifies the project proponent, presents and discusses the project objectives, project locations and specific project characteristics.
3. **Environmental Setting.** Provides a description of the existing physical setting of the County, an overview of the progress in implementing the 2030 CAP, and discusses the Program EIR baseline and approach to direct and cumulative analyses.

4. **Analysis of Environmental Issues.** Describes existing conditions found in the 2030 CAP area and assesses potential environmental impacts that may be generated by implementing the 2030 CAP and cumulative development in Santa Barbara County. These potential project impacts are compared to "thresholds of significance" in order to determine the nature and severity of the direct and indirect impacts. Mitigation measures, intended to reduce adverse, significant impacts below threshold levels, are proposed where feasible. Impacts that cannot be eliminated or mitigated to less-than-significant levels are also identified.
5. **Other CEQA-Required Discussions.** Identifies the spatial, economic, or population growth impacts that may result from implementation of the proposed project, as well as long-term effects of the 2030 CAP and significant irreversible environmental changes.
6. **Alternatives.** Presents and assesses the potential environmental impacts of three alternatives (including one no project) analyzed in addition to implementation of the 2030 CAP.
7. **References/Preparers.** Lists all published materials, federal, State, and local agencies, and other organizations and individuals consulted during the preparation of this Program EIR. It also lists the Program EIR preparers.

1.6 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) and Environmental Scoping Document/Initial Study**. After deciding that an EIR is required, the lead agency (County of Santa Barbara) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Environmental Scoping Document/Initial Study that identifies the issue areas for which the project could create significant environmental impacts.
2. **Draft EIR Prepared.** The Draft EIR must contain a) table of contents or index, b) summary, c) project description, d) environmental setting, e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts), f) a discussion of alternatives, g) mitigation measures, and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include a) the Draft EIR, b) copies of comments received during public review, c) list of persons and entities commenting, and d) responses to comments.

5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that a) the Final EIR has been completed in compliance with CEQA, b) the Final EIR was presented to the decision-making body of the lead agency, and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects, b) require changes to the project to reduce or avoid significant environmental effects, or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either a) the project has been changed to avoid or substantially reduce the magnitude of the impact, b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted, or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

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2 Project Description

This section describes the proposed 2030 Climate Action Plan (2030 CAP), plan location, objectives, and discretionary actions needed for approval. The County of Santa Barbara is both the project applicant/proponent and the Lead Agency for the 2030 CAP.

2.1 Lead Agency Contact

County of Santa Barbara
Sustainability Division, Community Services Department
123 East Anapamu Street
Santa Barbara, California 93101

Contact: Garrett Wong, Climate Program Manager
(805) 390-2983

2.2 Plan Location

The 2030 CAP would update the County's 2015 Energy and Climate Action Plan, which is implemented across unincorporated Santa Barbara County, excluding lands under the jurisdiction of incorporated cities, the federal government (Los Padres National Forest and Vandenberg Space Force Base), and the University of California. Santa Barbara County is shown in Figure 2-1. Section 3.0, *Environmental Setting*, provides a general overview of the environmental setting for the 2030 CAP.

2.3 2030 CAP Overview

In 2018, the County of Santa Barbara adopted a goal of 50 percent net reduction from 2018 emissions levels by 2030, and carbon neutrality by 2045. The 2030 CAP would include a community-wide greenhouse gas (GHG) emissions inventory and create climate action strategies to address issues related to improving building efficiency; decreasing transportation emissions; decreasing emissions related to water, wastewater, and solid waste; increasing carbon sequestration, creating food system improvements; and encouraging a low carbon economy. Climate action strategies within the 2030 CAP would be fulfilled through implementation of 2030 CAP Measures and Actions. A Measure is a long-range policy developed to achieve specific GHG reductions. An Action is a specific program or step that supports GHG reduction Measures. Adoption of the 2030 CAP would require accompanying amendments to the Energy Element and amendments to other components of the Santa Barbara County Comprehensive Plan as needed for consistency with 2030 CAP Measures and Actions.

Figure 2-1 Regional Location

2.3.1 Qualified Greenhouse Gas Emissions Reduction Plan

California Environmental Quality Act (CEQA) Guidelines Section 15183.5(b) stipulates that project-specific environmental documents can find that project-level GHG emissions would not be cumulatively considerable if the project complies with the requirements of a qualified GHG emissions reduction plan. The project-specific environmental document must identify those requirements in the GHG emissions reduction plan that applies to the project, and if they are not otherwise enforceable, must incorporate those requirements as project-specific mitigation measures. To meet the requirements of *CEQA Guidelines* Section 15183.5(b), a qualified GHG emissions reduction plan must do the following:

a. Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
b. Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
c. Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
d. Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
e. Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
f. Be adopted in a public process following environmental review.

The 2030 CAP would fulfill the requirements of a qualified greenhouse gas emissions reduction plan. The 2030 CAP includes a GHG emissions inventory, GHG emissions forecasts, and GHG emissions targets. The 2030 CAP provides specific GHG emission reduction Measures that collectively achieve the County's emissions targets and requires the County to conduct annual progress reporting for 2030 CAP implementation status. The 2030 CAP is a discretionary project which must undergo environmental review pursuant to CEQA, and is therefore subject to public review.

2.3.2 Programs, Policies, and New Development

The 2030 CAP does not identify individual site-specific projects that may result from implementing actions included in the 2030 CAP. However, the types of supportive programs, policies, financial pathways, and other commitments identified in the Actions included in the 2030 CAP are considered during review of the 2030 CAP. Such programs, policies, or potential new development would be aligned with the 2030 CAP Measures, included in Table 2-1.

Table 2-1 Santa Barbara County 2030 CAP GHG Emissions Reduction Measures List

Measure	Description
Building Energy Measures	
BE-1	Increase energy resilience in new and existing buildings
Transportation Measures	
TR-1	Increase the use of zero-emission vehicles
TR-2	Enhance transportation policy infrastructure planning
TR-3	Increase affordable housing and reduce number of commuter car trips
TR-4	Increase reliability and accessibility of transit services
TR-5	Reduce the need for commuting by encouraging work at home, walk to work and locating jobs near transit
TR-6	Decarbonize offroad emissions
Waste Measures	
W-1	Reduce food waste and increase use of organic recycled materials
W-2	Reduce use of non-recyclable and non-compostable single use items
Water and Wastewater Measures	
WW-1	Increase energy and carbon efficiency of water production treatment conveyance and use
Carbon Sequestration Measures	
CS-1	Facilitate carbon reduction through conservation and restoration of natural habitats and ecosystems and sequestration technologies
Food System Measures	
FS-1	Increase community food access equity and resilience
FS-2	Reduce energy- and carbon-intensity of the food system
Low Carbon Economy Measures	
LCE-1	Limit the increase of fossil-fuel extraction and develop a sunset strategy
LCE-2	Support local business in becoming more sustainable
Government Operations Measures	
GO-1	Increase sustainability and resilience of County-operated facilities

Source: 2030 CAP

Each of the 2030 CAP Measures are fulfilled through 2030 CAP Actions. 2030 CAP Actions identify the supportive programs, policies, financial pathways, and other commitments that assist in accomplishing these Measures. The types of infrastructure, improvements, and other new development facilitated by the 2030 CAP Actions includes, but is not limited to, the installation of electric vehicle charging stations; new bicycle or pedestrian facilities; upgrading existing infrastructure including electrical panels and branch circuits; the increase of sustainable agricultural practices such as expanding solar development on agricultural lands, increasing the use of compost, mulching, cover crops, and hedgerow planting; the restoration of natural habitats and ecosystems; and the development of new building policies to increase wildfire resilience. The 2030 CAP Actions promote programs or developments aligned with the 2030 CAP Measures which could introduce physical changes associated with construction and could alter pedestrian and vehicular traffic patterns. The potential environmental impacts of physical improvements and changes that could occur from implementation of 2030 CAP Measures and Actions are evaluated throughout this Program EIR. A full list of 2030 CAP Actions can be found within Table 2 of the 2030 CAP document.

Once adopted, the 2030 CAP would represent Santa Barbara County's approved emissions reduction program for all new development within unincorporated Santa Barbara. Future development projects in Santa Barbara County requiring discretionary approval would have the opportunity to demonstrate consistency with the 2030 CAP if they are consistent with the 2030 CAP's GHG emissions reduction measures. As discussed in Section 2.3.1, *Qualified Greenhouse Gas Emissions Reduction Plan*, any project that is consistent with a qualified GHG emissions reduction plan, and that conforms to specific performance standards applicable to new development identified in the plan, would not require additional GHG emissions analysis or mitigation in accordance with *CEQA Guidelines* Section 15183.5(b). In addition, a project's incremental contribution to a cumulative impact may not be cumulatively considerable if the project would comply with the requirements in a previously approved plan or mitigation program (including plans or regulations for the reduction of GHG emissions) that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area in which the project is proposed. Future discretionary development projects found by the County to be consistent with the 2030 CAP could streamline GHG analysis in accordance with *CEQA Guidelines* Section 15183.5.

Infrastructure, improvements, and other new development facilitated by the 2030 CAP Actions requiring discretionary approval would be subject to environmental review in accordance with CEQA and individual impact analyses would identify required plan- or project-specific mitigation measures where applicable. However, 2030 CAP-related projects implemented to promote 2030 CAP Measures and Actions would have the opportunity to rely on the programmatic environmental review contained in the certified Program EIR for the 2030 CAP for project-level analysis.

2.4 2030 CAP Objectives

The objectives of the 2030 CAP are as follows:

- Quantify GHG emissions in Santa Barbara County in a GHG inventory.
- Provide a road map to achieve GHG reductions that meet the State's SB 32 reduction target of 40 percent below baseline emissions by 2030, with an aspirational goal to meet the County's GHG emissions reduction target goal of 50 percent below baseline emissions by 2030.
- Demonstrate a level of GHG emissions below which future projects covered by the 2030 CAP would not have a cumulatively considerable contribution to GHG impacts.
- Serve as a Qualified Greenhouse Gas Emissions Reduction Plan to provide CEQA streamlining for future development projects.

2.5 Required Approvals for Adoption and Implementation

The County of Santa Barbara is both the project applicant/proponent and the Lead Agency for the 2030 CAP. The County of Santa Barbara Board of Supervisors will need to adopt any CAP-related Comprehensive Plan amendments (e.g., amendments to the Energy Element) to be consistent with, and ensure the successful implementation of, certain features of the CAP. In addition to the actions set forth above, the Coastal Commission must certify any amendments to the Local Coastal Program (LCP) – including Article II, as the implementing ordinance of the LCP.

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3 Environmental Setting and Impact Analysis Approach

This section provides a general overview of the environmental setting for the 2030 CAP. This section also outlines the Program EIR baseline and approach to both direct and cumulative impact analyses. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

Santa Barbara County is located in the central coastal area of California and is bounded by San Luis Obispo County to the north, Ventura County to the east, Kern County to the northeast, and the Pacific Ocean to the south and the west. The geographic center of the County is about 300 miles south of San Francisco and 115 miles from Downtown Los Angeles.

Santa Barbara County is primarily linked north/south by U.S. 101 or State Route 1. Approximately half of the undeveloped land in the County lies in the Los Padres National Forest (encompassing approximately 983 square miles) and Vandenberg Space Force Base (approximately 154 square miles).

The 2030 CAP would update the County's 2015 Energy and Climate Action Plan (ECAP) which is implemented across unincorporated Santa Barbara County, excluding lands under the jurisdiction of incorporated cities, the federal government (Los Padres National Forest and Vandenberg Space Force Base), and the University of California.

3.2 Program EIR Baseline, Approach for Direct and Cumulative Analyses

3.2.1 Program EIR Baseline

Section 15125 of the CEQA Guidelines states that an EIR "must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation [NOP] is published." Section 15125 states that this approach "normally constitute[s] the baseline physical conditions by which a lead agency determines whether an impact is significant."

This Program EIR evaluates impacts against existing conditions which are generally conditions existing at the time of the release of the NOP (November 2022). It was determined that a comparison to current, existing baseline conditions would provide the most relevant information for the public and decision-makers. The extent of the environmental setting evaluated at the baseline differs among resource areas, depending on the extent to which impacts would be expected. For example, air quality impacts are assessed relative to the South Coast Air Basin and Santa Barbara County, while transportation impacts are assessed relative to Santa Barbara County. All impact determinations are based on a comparison to existing 2022 baseline conditions.

Interim Timeframes

2030 is the horizon year of the Proposed 2030 CAP. While the 2030 CAP would be implemented gradually over the planning period, this Program EIR does not analyze interim time frames because the implementation timing of specific Actions included in the 2030 CAP is currently speculative. The one exception to this approach is in Section 4.3, *Greenhouse Gas Emissions*, which discusses years 2030 as well as a comparative baseline of 2018. The comparative baseline of 2018 is used because the County's emissions inventory provided in the 2030 CAP utilizes data from 2018 which represents the most readily available data to forecast future emissions. A summary of the scenarios considered in the GHG analysis is provided in Section 4.3, *Greenhouse Gas Emissions.*

3.2.2 Approach for Direct Impact Analysis

The programmatic nature of the 2030 CAP necessitates a general approach to the evaluation of existing conditions and impacts associated with the 2030 CAP. As a programmatic document, this Program EIR presents a regionwide assessment of impacts associated with implementation of the 2030 CAP, including programs, policies, and financial pathways. As discussed in Section 2.0, *Project Description*, the types of infrastructure, improvements, and other new development facilitated by the 2030 CAP Actions includes, but is not limited to, the installation of electric vehicle charging stations; new bicycle or pedestrian facilities; upgrading existing infrastructure including electrical panels and branch circuits; the increase of sustainable agricultural practices such as expanding solar development on agricultural lands, increasing the use of compost, mulching, cover crops, and hedgerow planting; the restoration of natural habitats and ecosystems; and the development of new building policies to increase wildfire resilience.

Because the Program EIR is a long-term document intended to guide actions seven years into the future, program-level and qualitative evaluation is involved. Quantitative analyses are provided where applicable with available information. During future stages in planning and implementation of specific elements of the 2030 CAP, including new development resulting from the 2030 CAP, project specific CEQA documents could be prepared by the appropriate project implementation agency.

For analytical purposes, the baseline year examined throughout this Program EIR is 2022, except where specifically noted, as described in Section 3.2.1, *Program EIR* Baseline, above.

3.2.3 Approach for Cumulative Analysis

CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable, or which can compound or increase other environmental impacts." Section 15130 of the CEQA Guidelines requires that an EIR evaluate environmental impacts that are individually limited but cumulatively considerable. These impacts can result from the 2030 CAP alone, or together with other projects/plans. The CEQA Guidelines state: "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable probable future projects" (CEQA Guidelines, Section 15355). A cumulative impact of concern under CEQA occurs when the net result of combined individual impacts compounds or increases other overall environmental impacts (CEQA Guidelines, Section 15355). In other words, cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. CEQA does not require an analysis of incremental effects that are not cumulatively considerable nor

is there a requirement to discuss impacts which do not result in part from the project evaluated in the EIR.

Cumulative Impact Methodology

Chapter 4 includes an analysis of both program specific and cumulative impacts of the 2030 CAP, as required by CEQA. As described in Section 1, *Introduction*, the Environmental Scoping Document/Initial Study prepared for the 2030 CAP determined there is no substantial evidence that significant impacts to Aesthetics/Visual Resources, Agricultural Resources, Biological Resources, Cultural Resources, Fire Protection, Geologic Processes, Hazardous Materials/Risk of Upset, Land Use, Noise, Public Facilities, Recreation, or Water Resources/Flooding would occur (refer to Appendix A). Accordingly, Chapter 4 of this Program EIR evaluates the 2030 CAP's potential impacts to air quality, energy, greenhouse gas emissions, and transportation. The *CEQA Guidelines* require the analysis of the cumulative effects of a project in combination with other probable future projects. Section 15130 of the *CEQA Guidelines* prescribes two methods for analyzing cumulative impacts: (1) use of a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts; or (2) use of a summary of projections contained in an adopted general plan or related planning document.

This document is a Program EIR that analyzes the effects of cumulative buildout of the 2030 CAP. The 2030 CAP covers a seven-year period from 2023 to 2030 and is an update of the 2015 Energy and Climate Action Plan. The County does not propose any land use changes in the 2030 CAP, but rather develops Measures and Actions consistent with the Comprehensive Plan's land use designations. The 2030 CAP considers probable future greenhouse gas reduction projects and includes a range of projects designed to meet the 2030 CAP goals, consistent with method one above. This Program EIR analyzes the cumulative impacts of these projects. The 2030 CAP also includes the cumulative scenario described in method two, as projections of cumulative greenhouse gas emissions which are compared to a business-as-usual scenario. Therefore, the cumulative effects of all probable future greenhouse gas reduction projects in the region are included in the analysis of the 2030 CAP impacts. Thus, in the environmental impact analysis for specific environmental issue areas, when impacts are evaluated to be significant, they also by definition are considered "cumulatively considerable" incremental contributions to significant cumulative impacts (*CEQA Guidelines* Section 15130[a]). 2030 CAP impacts assessed in this document represent the cumulative impact of all potential greenhouse gas reduction projects in the County.

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the 2030 CAP for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by the *CEQA Guidelines* Section 15382:

> means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the County and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The 2030 CAP would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. Cumulative methodology is discussed in detail in Section 3, *Environmental Setting*.

The Executive Summary of this Program EIR summarizes all impacts and mitigation measures that apply to the 2030 CAP.

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4.1 Air Quality

This section analyzes the potential effects of the 2030 CAP on air quality, including the 2030 CAP's potential to conflict with an applicable air quality plan, result in an increase of a criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions, such as those leading to odors.

4.1.1 Setting

a. Climate and Meteorology

Santa Barbara County is located in the South Central Coast Air Basin (SCCAB), which includes San Luis Obispo, Santa Barbara, and Ventura counties. The Santa Barbara County portion of the SCCAB is under the jurisdiction of the Santa Barbara County Air Pollution Control District (SBCAPCD). Geographic features that influence Santa Barbara's air quality include the Santa Barbara Channel (Pacific Ocean) to the south, and the east-west trending Santa Ynez Mountains to the north, with elevations up to 4,707 feet. The regional climate in the SCCAB is Mediterranean and is characterized by warm summers and mild winters with relatively dry weather. The annual precipitation is approximately 16 inches on average, with most (95 percent) occurring during the rainy season, which generally spans October through April (County of Santa Barbara 2023a; County of Santa Barbara 2023b).

An additional meteorological feature that influences Santa Barbara's climate is the semi-permanent subtropical high-pressure cell off the Pacific Coast. This cell creates the typical warm, dry summers and wet winters. Fog is frequently experienced along the County coastline due to the humid marine air coming into contact with the warmer air over land. Fog typically occurs in the early morning or evening, particularly during late spring and early summer. Inversions, or the trapping of a stable layer of cool air below warmer air can negatively affect air quality, due to reduced vertical mixing. An inversion essentially creates a cap, reducing the dispersion of pollutants into the upper atmosphere (vertically) or across air basins (horizontally). Surface and upper-level wind flows vary seasonally and geographically, and lack of wind and the right meteorological conditions can lead to an inversion. Surface temperature inversions occur between 0 and 500 feet above the ground surface, and are most common during the winter. Subsidence inversions (1,000 to 2,000 feet above ground surface) are most common during the summer.

The South Coast Air Basin experiences the Santa Ana northeasterly winds, primarily during the fall and winter, and sometimes in the spring. These winds bring warm dry winds from the high inland desert of California and Nevada at speeds of 15 to 20 miles per hour (mph) or more, which in turn blow pollutants emitted from coastal cities over the Pacific Ocean. When the wind direction shifts, the pollutants can return to coastal cities, causing a "post-Santa condition".

b. Sources of Air Pollution

Air pollutant emissions in the SCCAB are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.

- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources consist of legally operated vehicles on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles or when wildfires generate smoke containing particulate matter.

c. Air Pollutants of Primary Concern

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, reactive organic compounds (ROC)/reactive organic gases (ROG),[1] nitrogen oxides (NO_X), particulate matter with diameters of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROC and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The characteristics, sources and effects of criteria pollutants are discussed in the following subsections. The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

Ozone

Ozone is produced by a photochemical reaction (triggered by sunlight) between NO_X and ROC/ROG are composed of non-methane hydrocarbons (with some specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and nitrogen dioxide. NO_X are formed during the combustion of fuels, while ROC are formed during combustion and evaporation of organic solvents. As a highly reactive molecule, ozone readily combines with many different components of the atmosphere. Consequently, high levels of ozone tend to exist only while high ROC and NO_X levels along with abundant sunshine are present to sustain the ozone formation process. Once the precursors have been depleted, ozone levels rapidly decline. Because these reactions occur on a regional rather than local scale, ozone is considered a regional pollutant. In addition, because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans, including changes in breathing patterns, reduction of breathing capacity, increased susceptibility to infections, inflammation of lung tissue, and some immunological

[1] CARB defines ROC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that ROC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and ROC are considered comparable in terms of mass emissions, and the term ROC is used in this Program EIR.

changes (USEPA 2022a). Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide is a localized pollutant that is found in high concentrations only near its source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is the incomplete combustion of petroleum fuels by automobile traffic. Therefore, elevated concentrations are usually found only near areas of high traffic volumes. Other sources of carbon monoxide include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces during the winter. The health effects of carbon monoxide are related to its affinity for hemoglobin in the blood. Carbon monoxide causes a number of health problems, including aggravation of some heart diseases (e.g., angina), reduced tolerance for exercise, impaired mental function, and impaired fetal development. At high levels of exposure, carbon monoxide reduces the amount of oxygen in the blood, leading to mortality (USEPA 2022b). Carbon monoxide tends to dissipate rapidly into the atmosphere; consequently, violations of the NAAQS and/or CAAQS for carbon monoxide are generally associated with localized carbon monoxide "hotspots" that can occur at major roadway intersections during heavy peak-hour traffic conditions.

Nitrogen Dioxide

Nitrogen dioxide is a by-product of fuel combustion; the primary sources are motor vehicles and industrial boilers and furnaces. The principal form of NO_X produced by combustion is nitric oxide, but nitric oxide reacts rapidly with the oxygen in the air to form nitrogen dioxide, creating the mixture of nitric oxide and nitrogen dioxide commonly called NO_X. Nitrogen dioxide is an acute irritant that can aggravate respiratory illnesses and symptoms, particularly in sensitive groups (SCAQMD 1993 and 2005). A relationship between nitrogen dioxide and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility (USEPA 2022c). It can also contribute to the formation of PM_{10} and acid rain.

Sulfur Dioxide

Sulfur dioxide is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of sulfur dioxide emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of sulfur dioxide emissions include industrial processes such as extracting metal from ore and the burning of fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Sulfur dioxide is linked to a number of adverse effects on the respiratory system, including aggravation of respiratory diseases, such as asthma and emphysema, and reduced lung function (USEPA 2023).

Particulate Matter

Suspended atmospheric PM_{10} and $PM_{2.5}$ is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM_{10} and $PM_{2.5}$ are directly emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. Particulate matter is also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles while $PM_{2.5}$ is generally associated

with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. Due to its small size, $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of $PM_{2.5}$ that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance. Suspended particulates can also reduce lung function, aggravate respiratory and cardiovascular diseases, increase mortality rates, and reduce lung function growth in children (CARB 2023a).

Lead

Lead is a metal found naturally in the environment, as well as in manufacturing products. The major sources of lead emissions historically have been mobile and industrial sources. However, as a result of the USEPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least in part as a result of national emissions standards for hazardous air pollutants (USEPA 2013). As a result of phasing out leaded gasoline, metal processing currently remains the primary source of lead emissions. The highest level of lead in the air is generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. The health impacts of lead include behavioral and hearing disabilities in children and nervous system impairment (USEPA 2022d).

Toxic Air Contaminants

Toxic air contaminants (TACs) are a subcategory of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about $1/70^{th}$ the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2023b).

TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

d. Current Air Quality

The SCCAB is designated nonattainment for the federal and state standard for ozone and the state standard for PM_{10}. The SBCAPCD operates a network of air quality monitoring stations throughout the SCCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the NAAQS and CAAQS.

Table 4.1-1 Annual Ambient Air Quality Data

Pollutant	2019	2020	2021
Ozone (ppm), Worst 1-Hour	0.086	0.105	0.082
Number of days above CAAQS (>0.09 ppm)	0	4	0
Number of days above NAAQS (>0.12 ppm)	0	0	0
Ozone (ppm), Worst 8-Hour Average	0.072	0.086	0.071
Number of days above CAAQS (>0.070 ppm)	1	6	1
Number of days above NAAQS (>0.070 ppm)	1	6	1
Carbon Monoxide (ppm), Highest 8-Hour Average	1.2	1.0	1.4
Number of days above CAAQS or NAAQS (>9.0 ppm)	0	0	0
Nitrogen Dioxide (ppm), Worst 1-Hour	33.7	36.4	62.0
Number of days above CAAQS (>0.180 ppm)	0	0	0
Number of days above NAAQS (>0.100 ppm)	0	0	0
Sulfur Dioxide (ppm), Worst Hour	0.004	0.026	0.005
Number of days above CAAQS (>0.25 ppm)	0	0	0
Number of days above NAAQS (>0.075 ppm)	0	0	0
Particulate Matter ≤10 microns (μg/m^3), Worst 24 Hours	132	112	73
Number of days above CAAQS (>50 μg/m^3)	*	*	*
Number of days above NAAQS (>150 μg/m^3)	0	0	0
Particulate Matter ≤2.5 microns (μg/m^3), Worst 24 Hours	26.3	88.4	20.2
Number of days above NAAQS (>35 μg/m^3)	0	9	0
Lead (μg/m^3), 3-Month Average	*	*	*
Number of days above NAAQS (>0.15 μg/m^3)	*	*	*

ppm = parts per million; μg/m^3 = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard

The ambient air quality data presented in this table is intended to be representative of existing conditions and is not a comprehensive summary of all monitoring efforts for all the CAAQS and NAAQS. Additional ambient air quality data can be accessed at https://www.epa.gov/outdoor-air-quality-data/monitor-values-report.

* Insufficient data to determine value

Source: CARB 2023c; USEPA 2022e

e. Sensitive Receptors

The NAAQs and CAAQS were established to represent the levels of air quality considered sufficient to protect public health and welfare with an adequate margin of safety. They are designed to protect that segment of the public most susceptible to respiratory distress as a result of poor air quality, such as children under 14, persons over 65, persons engaged in strenuous work or exercise, and people with pre-existing cardiovascular and chronic respiratory diseases. Locations of sensitive receptors include schools, parks and playgrounds, hospitals, day cares, assisted living facilities, and residential communities, all of which are present in Santa Barbara County (CARB 2005). Federal, state and local regulations, including land use plans, can influence the proximity to which a sensitive receptor can be located near a significant source of air pollution.

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). CARB guidelines also suggest that sensitive receptors not be sited within 500 feet of a high traffic freeway to avoid prolonged exposure to diesel particulates (CARB 2005).

4.1.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

The federal CAA governs air quality in the United States. The CAA is administered by USEPA at the federal level, CARB at the State level, and by the Air Quality Management Districts at the regional and local levels. The CAA of 1970 and the CAA Amendments of 1971 required the USEPA to establish the NAAQS, with states retaining the option to adopt more stringent standards or to include other specific pollutants. On April 2, 2007, the Supreme Court found that CO_2 is an air pollutant covered by the CAA; however, no NAAQS have been established for CO_2.

The USEPA is responsible for enforcing the federal CAA. The USEPA is also responsible for establishing NAAQS. NAAQS are required under the 1977 CAA and subsequent amendments. The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The agency has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission standards established by CARB.

Construction Equipment Fuel Efficiency Standard

The USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements, which are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

b. State Regulations

California Clean Air Act

The California CAA allows the State to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. 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, including setting the CAAQS. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles

sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB also has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts.

California Code of Regulations

CARB has promulgated Airborne Toxic Control Measures (ATCMs) for several source categories. Each ATCM is codified under Titles 13 or 17 of the California Code of Regulations (CCR). CCR Title 13, Sections 2449 and 2485 set requirements for diesel-fueled vehicles. These requirements include, but are not limited to, idling restrictions which prohibits diesel-fueled vehicles from idling for more than five minutes and requirements for the use of diesel engines equipped to minimize emissions of particulate matter.

California Proposition 65

The USEPA considers those pollutants that could cause cancer risks between one in 10,000 (1.0×10^{4}) and one in one million (1.0×10^{-6}) for risk management. Proposition 65 (California Health and Safety Code Section 25249.6), enacted in 1986, prohibits a person in the course of doing business from knowingly and intentionally exposing any individual to a chemical that has been listed as known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning. For a chemical that is listed as a carcinogen, the "no significant risk" level under Proposition 65 is defined as the level that is calculated to result in not more than one excess case of cancer in 100,000 individuals (1.0×10^{-5}). The SBCAPCD recommends the use of this risk level (also reportable as 10 in one million) as the significance threshold for TACs (SBCAPCD 2022b).

c. Local Regulations

SBCAPCD 2022 Ozone Plan

As the local air quality management agency, the SBCAPCD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the SCCAB is classified as being in "attainment" or "nonattainment." In areas designated as non-attainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants, and the human health impacts described in Section 4.1.1c, *Air Pollutants of Primary Concern*, are already occurring in that area as part of the environmental baseline condition.

In accordance with State law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The *2001 Clean Air Plan* (2002) was the first plan prepared by SBCAPCD and established specific planning requirements to maintain the state one-hour ozone standard. In 2006, CARB revised the CAAQS and added an 8-hour average to the ozone standard. Both components of the standard must now be met before CARB can designate an area to be in attainment. The current 2022 Ozone Plan was adopted by SBCAPCD in December 2022 and is the tenth update to the 2001 Clean Air Plan. The 2022 Ozone Plan addresses SBCAPCD's progress toward attaining the federal and State ozone standard. As with prior updates, the 2022 update includes an evaluation of feasible reduction measures for stationary sources and considers numerous factors such as technology advancements, efficiency measures, cost-effectiveness, and the successful implementation of measures at other California air districts. All of the control

measures that were found to be feasible in prior ozone plan updates have been implemented (SBCAPCD 2022a).

SBCAPCD Regulations

To minimize potential impacts from project emissions, the SBCAPCD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the 2030 CAP include the following:

- **Regulation II, Rule 206 (Conditional Approval of Authority to Construct or Permit to Operate).** This rule governs the construction and operation of any new, modified, or reevaluated source for which a permit is required, subject to specified written conditions. Such conditions are for the purpose of ensuring that construction and operation of the source complies with all applicable local, State, and federal air quality laws, rules, and regulations.
- **Regulation III, Rule 302 (Visible Emissions).** This rule states person shall not discharge into the atmosphere from any single source of emission any air contaminants for a period or periods aggregating more than three minutes in any one hour which is:
  - As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
  - Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.1. of this Rule.
- **Regulation III, Rule 303 (Nuisance).** This rule states that 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 to 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.
- **Regulation III, Rule 304 (Particulate Matter- Northern Zone).** This rule states that in the northern zone of SBCAPCD jurisdiction a person shall not discharge into the atmosphere from any source particulate matter in excess of 0.3 grain per cubic foot of gas at standard conditions.
- **Regulation III, Rule 305 (Particulate Matter Concentration – Southern Zone).** This rule governs the amount of particulate matter a person can discharge in the southern zone of SBCAPCD jurisdiction.
- **Regulation III, Rule 323 (Architectural Coatings).** This rule governs the manufacture, distribution, and sale of architectural coatings and limits the reactive organic gases content in paints and paint solvents. Although this rule does not directly apply to the project, it does dictate the ROC content of paint available for use during the construction.
- **Regulation III, Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities).** This rule applies to any activity associated with construction or demolition of a structure or structures. Activities subject to this regulation are also subject to Rule 302 (Visible Emissions) and Rule 303 (Nuisance).
- **Regulation VIII, Rule 802 (New Source Review).** The purpose of New Source Review is to provide for the review of new and modified stationary sources of air pollution and provide mechanisms by which Authorities to Construct for such sources may be granted without interfering with the attainment or maintenance of any ambient air quality standard, preventing

reasonable further progress towards the attainment or maintenance of any ambient air quality standard and without interfering with the protection of areas designated attainment or unclassifiable. This rule applies to any applicant for a new or modified stationary source which emits or may emit any affected pollutant.

SBCAG 2050 RTP/SCS

On August 19, 2021, Santa Barbara County Association of Governments (SBCAG) approved Connected 2050, the region's long-range Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). The following Connected 2050 policies would be applicable to air quality impacts resulting from the 2030 CAP (SBCAG 2021):

- **Policy 1.2.1: Air Quality.** Transportation planning and projects shall be designed to lead to reductions in greenhouse gas and criteria pollutant emissions, consistent with the air quality goals of the region, including targets for greenhouse gas emissions from passenger vehicles in 2020 and 2035 as required by Senate Bill 375 (SB 375).
- **Policy 1.3.1: Alternative Fuels and Energy.** Transportation planning and projects shall encourage the use of alternative fuels, and the application of advanced transportation and energy technologies to reduce vehicular emission production and energy consumption.
- **Policy 2.2.2: 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.
- **Policy 2.3.1: Alternative Transportation Modes.** Transportation planning and projects shall encourage alternatives to single-occupancy vehicle trips and the use alternative transportation modes to reduce vehicle miles traveled and increase bike, walk and transit mode share.
- **Policy 2.3.2: Alternative Transportation Modes.** Transportation planning and projects shall provide for a variety of transportation modes and ensure connectivity within and between transportation modes both within and outside the Santa Barbara region. Alternative mode planning and projects shall be compatible with neighboring regions' transportation systems.

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan's Land Use Element contains an Air Quality Supplement which includes strategies and measures that incorporate air quality planning techniques into the County's land use planning program. Goals and policies in the Air Quality Supplement which are applicable to the 2030 CAP include (County of Santa Barbara 2009):

Goal. Significant increases in the use of bicycles, walking, and transit.

Goal. Reduced use of the automobile.

- **Policy C:** Increase the attractiveness of bicycling, walking, transit, and ridesharing.
- **Policy D:** Restrict the development of auto-dependent facilities.
- **Policy E:** Improve the integration of long-range planning and project approval procedures with air quality planning requirements.

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The evaluation of whether the 2030 CAP would conflict with or obstruct implementation of the applicable air quality plan is based on the 2030 CAP's consistency with the land use and population forecasts that underlie the air pollutant emissions forecasts contained in the 2022 Ozone Plan. Populations that remain within 2022 Ozone Plan and SBCAG forecasts are accounted for with regard to SBCAPCD emissions inventories. When population growth and employment growth exceed these forecasts, emission inventories could be surpassed, affecting attainment status.

To assess if the 2030 CAP would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, this analysis evaluates the potential for the 2030 CAP to result in air pollutant emissions during construction and operation of 2030 CAP-related projects and compares the potential for new air pollutant emissions to existing and proposed pollutant reduction measures required for new development.

The evaluation of whether the 2030 CAP would expose sensitive receptors to substantial pollutant concentration is based on an evaluation of State regulations, SBCAPCD regulations, and guidance from the California Office of Environmental Health Hazard Assessment (OEHHA). The evaluation of the 2030 CAP's potential to result in objectionable odors is based on regulations and guidance from SBCAPCD.

Significance Thresholds

Appendix G of the *State CEQA Guidelines* provides the following significance thresholds to determine if a project would have a potentially significant impact on air quality:

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 non-attainment under an applicable federal or state ambient air quality standard;
c. Expose sensitive receptors to substantial pollutant concentrations; or
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The County's *Environmental Thresholds and Guidelines Manual* contains thresholds which have been developed and implemented by SBCAPCD. The County and SBCAPCD have not adopted significance thresholds for construction-related emissions. However, according to SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* on a project-level, construction-related NO_X, ROC, PM_{10}, and $PM_{2.5}$ emissions from diesel- and gasoline-powered equipment, paving and other activities, should be quantified (SBCAPCD uses 25 tons per year for ROC or NO_X as a guideline for determining the significance of construction impacts for individual projects) (SBCAPCD 2022b). Construction-related emissions are speculative at the programmatic/plan level because such emissions are dependent on the characteristics of individual development projects. However, because construction activities resulting from projects implementing the 2030 CAP would generate temporary criteria pollutant emissions, primarily due to the operation of construction equipment and truck trips, a qualitative analysis of construction emissions is provided.

The County's *Environmental Thresholds and Guidelines Manual* and SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* state operation of a project would not have a significant air quality impact on the environment if operation of the project would:

- Emit (from all project sources, both stationary and mobile) less than the daily trigger for offsets or Air Quality Impact Analysis set in the SBCAPCD New Source Review Rule, for any pollutant (i.e., 240 lbs/day for ROC; 80 lbs/day for PM_{10}; there is no daily operational threshold for CO since it is an attainment pollution);
- Emit less than 25 lbs/day of NO_X or ROC from motor vehicle trips only;
- Not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone);
- Not exceed the SBCAPCD health risk public notification thresholds adopted by the SBCAPCD Board (10 excess cancer cases in a million for cancer risk and/or a Hazard Index of greater than (1.0) for non-cancer risk);
- Be consistent with the latest adopted federal and State air quality plans for Santa Barbara County.

The County and SBCAPCD have not established quantitative thresholds for program-level planning documents such as the 2030 CAP. Therefore, air quality impact resulting from implementation of the 2030 CAP are determined by evaluating the 2030 CAP's consistency with the 2022 Ozone Plan, and comparing reasonably foreseeable 2030 CAP-related projects to existing regulatory requirements.

b. 2030 CAP Impacts and Mitigation Measures

Threshold a:	Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE 2030 CAP WOULD NOT DIRECTLY RESULT IN REGIONAL POPULATION GROWTH OR AN INCREASE IN REGIONAL EMPLOYMENT AND WOULD BE CONSISTENT WITH THE COUNTY'S REGIONAL GROWTH FORECAST, WHICH IS THE BASIS FOR THE 2022 OZONE PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The 2030 CAP's consistency with the 2022 Ozone Plan is evaluated based on whether the 2030 CAP is accounted for in SBCAG's Regional Growth Forecast, which is the basis for the 2022 Ozone Plan. In addition, in order to be consistent with the 2022 Ozone Plan, projects involving earthmoving activities must implement SBCAPCD's standard dust control measures.

The 2030 CAP does not promote residential development; therefore, the 2030 CAP would not directly result in population/housing unit growth. Furthermore, the 2030 CAP would not directly result in a long-term increase in regional employment because the 2030 CAP does not propose commercial or industrial development. Any new employment opportunities that may indirectly result from construction activities associated with 2030 CAP-related projects would be temporary, and would target existing residents. Therefore, the 2030 CAP would not conflict with population growth or employment projections.

In accordance with the 2022 Ozone Plan, standard dust control measures would be implemented during grading and earth moving activities for 2030 CAP-related projects requiring a grading permit. Similarly, all construction activities in SBCAPCD's jurisdiction are required to comply with the

requirements of SBCAPCD Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities) which would reduce temporary construction emissions.

Overall, the 2030 CAP would not conflict with or obstruct implementation of the 2022 Ozone Plan. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

Threshold b:	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-2 CONSTRUCTION OF 2030 CAP-RELATED PROJECTS WOULD COMPLY WITH APPLICABLE SBCAPCD RULES, WHICH ARE DESIGNED TO MINIMIZE CONSTRUCTION EMISSIONS IN THE COUNTY. THE 2030 CAP WOULD IMPLEMENT ACTIONS WHICH WOULD REDUCE LONG-TERM REGIONAL POLLUTANT EMISSIONS ASSOCIATED WITH VEHICLE USE, BUILDING USE, AND LANDFILL OPERATIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The SCCAB is designated nonattainment for the federal and state standard for ozone and the State standard for PM_{10}. The SCCAB is designated in attainment or unclassifiable for all other federal and State standards. The following provides a discussion of the 2030 CAP's potential to result in cumulatively considerable net increases of ozone and/or PM_{10}.

Temporary Construction

Construction activities from 2030 CAP-related projects would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles. The extent of daily emissions, particularly NO_X emissions, generated by construction equipment, would depend on the equipment used and the hours of operation for each project. The extent of PM_{10} and $PM_{2.5}$ emissions would depend upon the following factors: (1) the amount of disturbed soils; (2) the length of disturbance time; (3) whether existing structures are demolished; (4) whether excavation is involved; and (5) whether transporting excavated materials off site is necessary. It is possible ROC emissions could be released during any paving and architectural coating activities, and the extent of ROC emissions would primarily depend on the square footage of buildings being painted and asphalt surfaces being paved daily.

As discussed in Section 4.1.3a, *Methodology and Significance Thresholds*, the County and SBCAPCD have not established programmatic significance thresholds for construction air pollutant emissions. At this time, detail regarding the specific scope and timing of construction of 2030-CAP related projects is unknown given the 2030 CAP is a policy document, absent of specific development proposals. As a result, it would be speculative to estimate potential project-level construction emissions quantitatively, and a qualitative approach to characterizing construction-related air emissions has been employed for this analysis.

Construction of 2030 CAP-related projects would comply with applicable SBCAPCD rules including Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities), Rule 303 (Nuisance), Rule 323 (Architectural Coating), and Rule 206 (Conditional Approval of Authority to Construct or Permit to Operate). Additionally, the SBCAPCD's Standard Dust Control Measures are

required to be applied to all projects. Compliance with SBCAPCD rules would reduce the overall level of emissions associated with 2030 CAP-related construction activities.

For discretionary projects resulting in construction emissions as discussed above, County and SBCAPCD thresholds would be applied, with determinations made as to whether additional mitigation measures would be required, as described in Section 6 of the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (SBCAPCD 2022b). Discretionary and ministerial development would be required to adhere to Section 14-23 of the County Code, which requires construction personnel to apply water to graded surfaces and materials to prevent fugitive dust. Therefore, construction activities related to the 2030 CAP would result in a less than significant impact related to the net increase of criteria pollutants.

Long-Term Regional Operation

Implementation of 2030 CAP-related projects would result in reduced long-term regional pollutant emissions associated with vehicle use, building use, and landfill operations. The 2030 CAP includes Actions TR-1.1 through TR-1.10 which are designed to increase electric vehicle use and reduce the use of gasoline-powered vehicles. Actions TR-2.1 through TR-2.12 promote active and alternative transportation, which would further reduce reliance on gasoline-powered vehicles and reduce vehicle miles traveled, thereby reducing air pollutant emissions associated with vehicles. 2030 CAP Actions CE-1.1, CE-1.5, and CE-1.10 promote the use of renewable energy and require the County to restrict natural gas infrastructure for new development and major remodels, achieve 100 percent renewable energy use for residential and commercial customers, and expand opportunities for solar development. Implementation of these 2030 CAP Actions would reduce air emissions from buildings. 2030 CAP Actions W-1.1 through W-2.3 promote the reduction of landfill waste, which would reduce pollutant emissions associated with landfill operations.

The 2030 CAP would implement Actions which would reduce regional air pollutant emissions in Santa Barbara County. Operation of the 2030 CAP would not result in a cumulatively considerable net increase of any criteria pollutant for which the SCCAB is in non-attainment (ROC, NO_X and PM_{10}). This impact would be less than significant.

Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

Threshold c:	Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 2030 CAP-RELATED PROJECTS COULD WOULD RESULT IN SMALL-SCALE CONSTRUCTION ACTIVITIES, WHICH MAY OCCUR IN PROXIMITY TO SENSITIVE RECEPTORS. EXISTING STATE REGULATIONS, SBCAPCD REGULATIONS, AND PROJECT-SPECIFIC ENVIRONMENTAL REVIEW WOULD MINIMIZE THE POTENTIAL FOR SENSITIVE RECEPTORS TO BE EXPOSED TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. IMPLEMENTATION OF THE 2030 CAP WOULD REDUCE LONG-TERM REGIONAL POLLUTANT EMISSIONS AND REDUCE THE POTENTIAL FOR EXISTING SENSITIVE RECEPTORS TO BE EXPOSED TO TAC CONCENTRATIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Carbon Monoxide

A carbon monoxide hotspot is a localized concentration of carbon monoxide that exceeds the NAAQS and CAAQS. Localized carbon monoxide hotspots can occur at intersections with heavy peak

hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local carbon monoxide concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and State eight-hour standard of 9.0 ppm.

The SCCAB is in attainment of the carbon monoxide NAAQS and CAAQS. The SBCAPCD states that due to the relatively low background ambient carbon monoxide levels in Santa Barbara County, localized carbon monoxide impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards. Therefore, carbon monoxide hotspot analyses are no longer required in Santa Barbara (SBCAPCD 2022a).

Based on the low background level of carbon monoxide in Santa Barbara County, improved vehicle emissions standards for new vehicles in accordance with State and federal regulations, and the low level of operational carbon monoxide emissions anticipated for 2030 CAP-related projects, the 2030 CAP would not create new carbon monoxide hotspots or contribute to substantially existing hotspots. Therefore, the 2030 CAP would not expose sensitive receptors to substantial carbon monoxide concentrations.

Toxic Air Contaminants

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The following subsections discuss the 2030 CAP's potential to result in impacts related to TAC emissions during construction and operation.

Construction

Construction-related activities would result in temporary emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM is a carcinogen and approximately 70 percent of total known cancer risk related to TACs in California are attributable to DPM. DPM also contributes to similar non-cancer related health effects as $PM_{2.5}$ exposure. However, because DPM contributes to substantially more cancer risk than other non-cancer related impacts, the potential cancer risk from the inhalation of DPM is the focus of this analysis (CARB 2023b).

Generation of DPM from construction projects typically occurs in a single area for a temporary period during construction activity. The extent to which an affected receptor is exposed is a function of the concentration of a TAC in the environment and the extent of exposure the receptor has with the TAC, with a longer exposure period resulting in a higher exposure level. DPM emissions associated with construction occurs primarily in site preparation (i.e., excavation) and grading activities where heavy, diesel-powered machinery is utilized. According to the OEHHA, construction of individual projects lasting longer than two months or placed within 1,000 feet of sensitive receptors could potentially expose nearby sensitive receptors to substantial pollutant concentrations and therefore could result in potentially significant risk impacts (OEHHA 2015). Additionally, for the types of projects discussed above, if they do not utilize Tier 4 or alternative fuel construction equipment, the potential for substantial heath impacts to occur increases.

A majority of reasonably foreseeable 2030 CAP-related projects would not require substantial site preparation and grading activities. 2030 CAP Measure CE-1 requires energy efficiency in new and existing buildings but would not obligate the County or other entity to construct new buildings. 2030 CAP Actions related to reducing food waste and reducing non-recyclable single use items would not result in new development. 2030 CAP Actions promoting Measure NBS-1 involve

supporting existing agriculture and implementing programs for composting and tree planting which are not types of projects that require site preparation and grading. Overall, the 2030 CAP would not directly result in substantial new development or other construction activity necessitating the use of heavy machinery that would cause substantial DPM and TAC emissions.

In instances where implementation of 2030 CAP Measures and Actions result in construction activities involving site preparation and grading, all discretionary approvals would be subject to project-specific environmental review in which the County would identify and mitigate project-specific environmental impacts related to TAC emissions. As discussed in Impact AQ-2, construction of 2030 CAP-related projects would comply with State ATCMS and applicable SBCAPCD rules including CCR Title 13, Sections 2449 and 2485 requirements for diesel-fueled vehicles, Rule 303 (Nuisance), Rule 323 (Architectural Coating), and Rule 206 (Conditional Approval of Authority to Construct or Permit to Operate). Compliance with State ATCMs and SBCAPCD rules would reduce the overall level of TAC emissions associated with 2030 CAP-related construction activities. 2030 CAP Actions promote Measure CE-1, which would require energy efficiency in new and existing buildings but would not obligate the County or other entity to construct new buildings. 2030 CAP Actions related to reducing food waste and reducing non-recyclable single use items would not result in new development. 2030 CAP Actions promoting Measure NBS-1 involve supporting existing agriculture and implementing programs for composting and tree planting which are not types of projects that require site preparation and grading. Because the 2030 CAP would not directly result in substantial new development that would involve the use of heavy machinery which could result in substantial DPM and TAC emissions, and because construction activity would be required to comply with State ATCMS and applicable SBCAPCD rules, construction related TAC impacts would be less than significant.

Operation

The 2030 CAP would not result in development of new sensitive land uses, including residences, schools, daycare centers, playgrounds, or medical facilities. Therefore, operation of 2030 CAP-related projects would not result in the introduction of new sensitive receptors in proximity to TAC concentrations. As described in Impact AQ-2, the 2030 CAP would implement Actions which would reduce long-term regional pollutant emissions associated with vehicle use and building use, thereby reducing the potential for existing sensitive receptors to be exposed to TAC concentrations. Therefore, the 2030 CAP would not result in long-term exposure of sensitive receptors to substantial pollutant concentrations.

Mitigation Measures

No mitigation measures are required because this impact is less than significant.

Threshold d:	Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4 2030 CAP-RELATED PROJECTS WOULD BE SUBJECT TO SBCAPCD REGULATIONS WHICH WOULD MINIMIZE THE CREATION OF ODORS DURING CONSTRUCTION. THE 2030 CAP WOULD NOT RESULT IN OR PROMOTE PROJECTS IDENTIFIED BY SBCAPCD AS HAVING THE POTENTIAL TO RESULT IN SUBSTANTIAL ODORS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The occurrence and severity of objectionable odors depend on a number of factors, including the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of

the receiving location. Although objectionable odors seldom cause physical harm, they can be perceived as a nuisance, cause distress among the public, and result in citizen complaints.

2030 CAP-related project construction may produce temporary odors associated with operation of construction equipment. Examples of odors produced by construction activities include concentrations of unburned hydrocarbons from construction equipment tailpipes and reactive organic gases/compounds from architectural coatings. Such odors generally disperse rapidly from individual project sites, occur at magnitudes that would not affect substantial numbers of people, and would be limited to the temporary construction period.

Construction activities in accordance with 2030 CAP-related projects would be required to comply with SBCAPCD Rule 303, which regulates nuisance odors (SBCAPCD 1978). The types of reasonably foreseeable 2030 CAP-related projects does not include projects, such as fast food restaurants, bakeries, or coffee roasting facilities, identified by SBCAPCD as having the potential result in substantial odors (SBCAPCD 2022b). Accordingly, the 2030 CAP would not result in the creation of objectionable odors affecting a substantial number of people. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

4.2 Energy

This section discusses the 2030 CAP's potential to result in wasteful or inefficient use of energy, or conflict with state or local plans related to energy. Physical environmental impacts associated with criteria pollutants and greenhouse gas emissions (GHGs) that result from electricity generation and burning of fuels are discussed in Section 4.1, *Air Quality*, and Section 4.3, *Greenhouse Gas Emissions*.

4.2.1 Setting

Energy use relates directly to environmental quality because energy use can adversely affect air quality and can generate GHG emissions that contribute to climate change. Fossil fuels are burned to create electricity that powers residences, heats and cools buildings, and powers vehicles. Transportation energy use is dependent on the fuel efficiency of cars, trucks, and public transportation; the different travel modes such as auto, carpool, and public transit; and the miles traveled using these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

a. Electricity

In 2021, California's in-state electricity generation totaled 194,127 gigawatt-hours (GWh) (California Energy Commission [CEC] 2022a). Primary fuel sources for the state's electricity generation in 2021 included natural gas, solar photovoltaic, nuclear, wind, hydroelectric, and geothermal. According to the Final 2022 Integrated Energy Policy Report, California's electricity sector is becoming increasingly reliant on solar, with more than 22,000 GWh of electricity produced by photovoltaic systems in 2021 (CEC 2023a).

Electricity providers in the County include Pacific Gas and Electric Company (PG&E) and the Southern California Edison Company (SCE). SCE maintains 91,375 miles of electric distribution lines and 12,635 miles of interconnected transmission lines (SCE 2023). PG&E maintains approximately 106,681 miles of electric distribution lines and 18,466 miles of interconnected transmission lines (PG&E 2023). Central Coast Community Energy (3CE) is a Community Choice Aggregator established by local communities to source clean and renewable electricity for Santa Barbara, San Luis Obispo, Monterey, San Benito, and Santa Cruz counties while retaining the primary utility provider's (i.e., PG&E, SCE) traditional role delivering power, maintaining electric infrastructure, and billing for electricity. In 2021, 3CE's power mix consisted of 38.4 percent renewable resources, 11.8 percent large hydroelectric facilities, and 49.8 percent unspecified power (3CE 2022).

Santa Barbara County consumed an estimated 2,733 GWh of electricity in 2021, which was approximately 3.4 percent of SCE's electricity consumption, approximately 3.5 percent of PG&E's electricity consumption, and approximately 1.0 percent of statewide electricity consumption (CEC 2022b; CEC 2022c; California Department of Finance [DOF] 2022). Table 4.2-1 provides an overview 2021 electricity consumption in Santa Barbara County, in California, by PG&E customers and by SCE customers.

Table 4.2-1 2021 Electricity Consumption

Energy Type	Santa Barbara County (GWh)	SCE (GWh)	PG&E (GWh)	California (GWh)	Proportion of SCE Consumption	Proportion of PG&E Consumption	Proportion of Statewide Consumption[1]
Electricity	2,733	81,128	78,587	280,738	3.4	3.5	1.0

GWh = Gigawatt hours

[1]For reference, the population of Santa Barbara County (445,164) is approximately 1.1 percent of the population of California (39,185,605).

Source: CEC 2022b; CEC 2022c; DOF 2022

b. Natural Gas

California's net natural gas production for 2019 was 166 billion cubic feet (CalGEM 2020). California depends on out-of-state imports for nearly 90 percent of its natural gas supply. The CEC estimates approximately 45 percent of natural gas burned in California is used for electricity generation, 21 percent is used in the residential sector, 25 percent is used in the industrial sector, and 9 percent is used in the commercial sector (CEC 2023b).

The Southern California Gas Company (SCG) is the principal distributor of natural gas in Santa Barbara County (CEC 2021). SCG's service area is equipped with 101,000 miles of gas transmission and distribution pipelines (SCG 2023). Natural gas supplied by SCG is sourced from California (onshore and offshore), Southwestern United States (the Permian, Anadarko, and San Juan basins), the Rocky Mountains, and Canada (California Gas and Electric Utilities 2022). In 2021, SCG customers consumed a total of 5,100 million therms of natural gas. Residential users accounted for approximately 44 percent of SCG's natural gas consumption. Industrial and commercial users accounted for another 32 percent and 17 percent of consumption, respectively. The remainder was used for agriculture, water pumping, mining, and construction activities (CEC 2022d).

Santa Barbara County consumed approximately 130 million therms of natural gas in 2021, which was approximately 2.5 percent of the natural gas consumed by SCG customers and approximately 1.1 percent of statewide natural gas consumption (CEC 2022d; CEC 2022e). Table 4.2-2 provides an overview of natural gas consumption in Santa Barbara County and compares natural gas use in the County with natural gas use in California, and by SCG customers statewide.

Table 4.2-2 2021 Natural Gas Consumption

Energy Type	Santa Barbara County (millions of Therms)	SCG (millions of Therms)	California (millions of Therms)	Proportion of SCG Consumption	Proportion of Statewide Consumption[1]
Natural Gas	130	5,100	11,922	2.5	1.1

[1]For reference, the population of Santa Barbara County (445,164) is approximately 1.1 percent of the population of California (39,185,605).

Source: CEC 2022d; CEC 2022e; DOF 2022

c. Petroleum

California is one of the top producers of petroleum in the nation with drilling operations occurring throughout the state but concentrated primarily in Kern and Los Angeles counties. A network of crude oil pipelines connects production areas to oil refineries in Northern and Southern California. California oil refineries also process Alaskan and foreign crude oil (2022f). According to the United States Energy Information Administration (USEIA), California oil refineries produced almost 131

million barrels of crude oil in 2021 (USEIA 2022). According to the California Department of Conservation, Geologic Energy Management Division (CalGEM), there are several idle and plugged oil and gas production wells, plugged wells, active observation wells, and permitted wells in Santa Barbara County (CalGEM 2023).

Santa Barbara County consumed an estimated 168 million gallons of gasoline and an estimated 17 million gallons of diesel fuel in 2021, which was approximately 1.2 percent of statewide gasoline consumption 0.9 percent of statewide diesel fuel consumption (CEC 2022g). Table 4.2-3 provides an overview of 2021 gasoline and diesel consumption in Santa Barbara County and California.

Table 4.2-3 2021 Gasoline and Diesel Consumption

Fuel Type	Santa Barbara County (million gallons)	California (million gallons)	Proportion of Statewide Consumption[1]
Gasoline	168	13,818	1.2
Diesel	17	1,883	0.9

[1]For reference, the population of Santa Barbara County (445,164) is approximately 1.1 percent of the population of California (39,185,605).

Source: CEC 2022g; California Department of Finance (DOF) 2022

4.2.2 Regulatory Setting

a. Federal Regulations

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 was designed to improve vehicle fuel economy and help reduce nationwide dependence on foreign oil. It expands the production of renewable fuels, reducing dependence on oil, and confronting global climate change. Specifically, it increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard and reduces U.S. demand for oil by setting a national fuel economy standard of 35 mpg by 2020. The Act also set energy efficiency standards for lighting (specifically light bulbs) and appliances.

Energy Policy and Conservation Act

Enacted in 1975, the Energy Policy and Conservation Act legislation established fuel economy standards for new light-duty vehicles (autos, pickups, vans, and sport-utility vehicles). The law placed responsibility on the National Highway Traffic and Safety Administration (NHTSA), a part of the U.S. Department of Transportation (USDOT), for establishing and regularly updating vehicle standards. The U.S. Environmental Protection Agency (USEPA) administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. Since the inception of the program, the average fuel economy for new light-duty vehicles steadily increased from 13.1 miles per gallon (mpg) for the 1975 model year to 30.7 mpg for the 2014 model year and can increase to 54.5 mpg by 2025.

On August 2, 2018, the NHTSA and USEPA, operating under the direction of the Trump Administration, proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

- Part One, "One National Program" (84 Federal Register 51310) revokes a waiver granted by USEPA to the State of California under Section 209 of the Clean Air Act to enforce more stringent emission standards for motor vehicles than those required by USEPA for the explicit purpose of GHG emission reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of the California Air Resources Board (CARB) to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California.
- Part Two addresses CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by NHTSA and USEPA, with USEPA simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years.

The USEPA and NTHSA published final rules to amend and establish national CO_2 and fuel economy standards on April 30, 2020 (Part Two of the SAFE Vehicles Rule) (85 Federal Register 24174). On April 22, 2021, the Biden Administration formally proposed to roll back portions of the SAFE Rule, thereby restoring California's right to enforce more stringent fuel efficiency standards. Most recently, on December 21, 2021, the NHTSA finalized rules to repeal the SAFE I Rule. The final rule concludes the SAFE I Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important State and local interests. The final rule ensures the SAFE I Rule will no longer form an improper barrier to states exploring creative solutions to address their local communities' environmental and public health challenges.

Construction Equipment Fuel Efficiency Standard

The USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were to be completely phased in by the end of 2015.

b. State Regulations

California Energy Plan

The CEC, in collaboration with California Public Utilities Commission (CPUC), is responsible for preparing the California Energy Action Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The 2003 Energy Action Plan calls for the State to assist in transformation of the transportation system to improve air quality, reduce congestion, and increase efficient use of fuel supplies with the least environmental and energy costs. The Energy Action Plan identifies strategies, such as assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs and encourages urban designs that

reduce VMT and accommodate pedestrian and bicycle access. In the 2005 Energy Action Plan, the CEC and CPUC updated the energy policy vision by adding dimensions to the policy areas, such as information on the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the 2005 Energy Action Plan in 2008 that supplements the earlier Energy Action Plans and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1493

Assembly Bill 1493 (Chapter 200, Statutes of 2002), known as the Pavley Bill, amended Health and Safety Code Sections 42823 and added 43018.5, requiring CARB to develop and adopt regulations that achieve 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.

Senate Bill 100 (100 Percent Clean Energy Act)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

California Code of Regulations Title 24 (California Building Code)

Updated every three years through a rigorous stakeholder process, Title 24 of the California Code of Regulations requires California homes and businesses to meet strong energy efficiency and sustainability measures, thereby lowering their GHG emissions. Title 24 contains numerous subparts, including Part 1 (Administrative Code), Part 2 (Building Code), Part 3 (Electrical Code), Part 4 (Mechanical Code), Part 5 (Plumbing Code), Part 6 (Energy Code), Part 8 (Historical Building Code), Part 9 (Fire Code), Part 10 (Existing Building Code), Part 11 (Green Building Standards Code), Part 12 (Referenced Standards Code). The California Building Code is applicable to all development in California (Health and Safety Code Sections 17950 and 18938[b].

The regulations receive input from members of industry, as well as the public, with the goal of "[r]educing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (Public Resources Code Section 25402). These regulations are scrutinized and analyzed for technological and economic feasibility (Public Resources Code Section 25402[d]) and cost effectiveness (Public Resources Code Sections 25402[b][2] and [b][3]).

Part 6 – Building Energy Efficiency Standards

California Code of Regulations Title 24 Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. The Building Energy Efficiency Standards is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission.

In 2021, the California Energy Commission updated Title 24 standards with more stringent requirements that became effective January 1, 2023. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided these standards exceed those provided in Title 24.

The 2022 update to the Building Energy Efficiency Standards under Title 24 applies to buildings for which an application for a building permit is submitted on or after January 1, 2023. The updated standards mainly established electric-ready requirements when natural gas is installed, expanded solar photovoltaic and battery storage standards, and strengthened ventilation standards to improve indoor air quality.

Part 11 – California Green Building Standards

The California Green Building Standards Code, commonly referred to as "CALGreen" originally went into effect on August 1, 2009 and outlines architectural design and engineering principles that are in synergy with environmental resources and public welfare. CALGreen sets minimum standards for buildings, and since 2016, applies to new building construction and some alterations/additions within certain parameters. CALGreen establishes planning and design standards for sustainable site development, including water conservation measures and requirements that new buildings reduce water consumption by 20 percent below a specified baseline. CALGreen requires installations of 1.28 gallons-per-flush toilets and 0.5-gallon-per flush urinals for all non-residential projects as part of the prescriptive method of reducing indoor water use by the required 20 percent.

CALGreen lays out the minimum requirements for newly constructed residential and non-residential buildings to reduce greenhouse gas emissions through improved efficiency and process improvements. It also includes voluntary tiers to encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design. In addition, CALGreen includes several requirements related to solid waste diversion. Importantly, new non-residential construction is required to achieve at least 65 percent construction and demolition waste diversion and provide recycling areas for paper, cardboard, glass, plastics, metal, and organic waste. The 2022 CALGreen update primarily includes new requirements for the inclusion of electric vehicle charging stations and carbon dioxide monitoring and controls in classrooms. These requirements went into effect January 1, 2023.

Assembly Bill 1007

Assembly Bill 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other federal, State, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

CARB In-Use On-Road and Off-Road Diesel Rules

The CARB In-Use On-Road and Off-Road Diesel Rules impose limits on idling, restrict the addition of older vehicles, and require the retirement or replacement of older engines depending on their fleet size category. This policy indirectly impacts energy consumption. More specifically, CARB is also charged with developing air pollution control regulations based upon the best available control measures and implementing every feasible control measure under the State and Federal Clean Air Act (Health and Safety Code Sections 39602.5, 39667, 43013[a, h], 43018, 40600, 40601, 40612[a][2] and [c][1][A]). Pursuant to these directives, stringent emission standards were adopted in 2004 for off-road construction equipment (i.e., "Tier 4" standards) (40 Code of Federal Regulations Parts 1039, 1065, and 1068; Title 13 California Code of Regulations Section 2025). CARB also adopted emission standards for on-road heavy duty diesel vehicles (i.e., haul trucks) (13 California Code of Regulations Section 1956.8). These haul truck regulations mandate fleet turnover to ensure that nearly all on-road diesel trucks will have 2010 model year engines or equivalent (i.e., Tier 4) by January 1, 2023.

California Advanced Clean Trucks Program

In June 2020, CARB approved the Advanced Clean Trucks regulation, which requires manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. In addition, the regulation requires company and fleet reporting for large employers and fleet owners with 50 or more trucks. By 2045, all new trucks sold in California must be zero-emission. Implementation of this regulation would reduce consumption of nonrenewable transportation fuels as trucks transition to alternative fuel sources.

c. Local Regulations

County of Santa Barbara Comprehensive Plan

The County's Comprehensive Plan contains goals and policies aimed at guiding future development in Santa Barbara County. The Energy Element contains goals and policies pertaining to energy efficiency and alternative energy sources. Goals and policies relevant to the 2030 CAP include the following (County of Santa Barbara 2015):

Goal 1: Governmental Facilities and Operations. Provide for cost-effective and efficient use of energy in the facilities and operations owned by the County of Santa Barbara to reduce operating costs, mitigate adverse environmental impacts and set a good example in the community.

- **Policy 1.2: Retrofit Governmental Buildings.** County facilities shall be retrofitted to improve energy efficiency where improvements offer full return on investment in 5 years or less by way of energy savings.
- **Policy 1.4: Energy-Efficient Purchasing**. The County shall promote purchasing of energy-efficient equipment based on a fair return on investment, and shall use energy-savings estimates as one basis for purchasing decisions for major energy-using devices.
- **Policy 1.5: Governmental Vehicle Efficiency.** The County shall purchase fuel-efficient and alternatively fueled vehicles for the County fleet, to the maximum extent feasible.
- **Policy 1.6: Siting Governmental Facilities.** Promote coordination of new public facilities with mass transit service and other alternative transportation services, including bicycles, and design structures to enhance mass transit, bicycle, and pedestrian use.

Goal 2: Buildings. Foster development whose location, design, construction, and systems reduce the use of non-renewable energy resources in buildings and urban services.

- **Policy 2.1: Voluntarily Going Beyond State Building Energy Standards.** Establish mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards of the California Building Code (Title 24) in new and existing buildings by implementing energy efficiency measures.
- **Policy 2.4: Passive Solar Designs.** Encourage increased use of passive, solar design and daylighting in existing and new structures.
- **Policy 2.6: Retrofitting Buildings Audit/Rebate Programs**. Encourage homeowners, and commercial and industrial building owners to improve energy efficiency upon renovation of buildings.
- **Policy 2.7: Shade Trees:** The County shall maintain and expand the tree population to enhance the cooling benefits.

Goal 3: Transportation and Land Use. Provide a composition of land-uses and transportation programs that reduces dependency on automobiles.

- **Policy 3.1: Alternative Transportation and Support Facilities.** Enhance opportunities for alternative transportation.
- **Policy 3.5: Bikeways and Support Facilities.** The County shall consider the completion of an integrated bikeway system, linking residences with commercial centers, work locations, schools, parks and mass transit facilities to be a high priority for promoting the use of the bicycle as an alternative mode of transportation.
- **Policy 3.6: Pedestrian-Oriented Designs.** The County shall improve the convenience, comfort and safety for pedestrians.
- **Policy 3.7: Mixed-Use Developments.** Planning efforts shall focus on mixed-use development to reduce vehicular trips, where appropriate.
- **Policy 3.8: Employment Density Near Mass Transit**. The County shall coordinate office, commercial and industrial developments with mass transit service and existing or proposed bikeways.
- **Policy 3.9: Housing Density Near Mass Transit.** The County shall coordinate high density residential developments with mass transit service and existing or proposed bikeways.

Goal 4: Water Use and Solid Waste. Increase the efficiency of water and resource use to reduce energy consumption associated with various phases of using resources (pumping, distribution, treatment, heating, etc.).

- **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 4.7: 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.

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.

- **Policy 5.2: Alternative Energy Technologies.** The County shall encourage the use of alternative energy technology in appropriate new and existing development.
- **Policy 5.4: Solar Photovoltaic Equipment.** The County shall use solar photovoltaic equipment in county applications when it is cost-effective on a life-cycle cost basis.
- **Policy 5.9: Electric Vehicle Charging Facilities.** Encourage electric vehicle recharging infrastructure.
- **Policy 5.10: Alternatively Fueled Vehicles.** The County shall encourage the use of alternatively fueled vehicles by individuals.

Goal 6: Incentive Program. Employ a design approach which takes maximum advantage of incentive-based policy measures.

- **Policy 6.1: Incentive Program.** The County shall prepare an Incentive Program for implementing the incentive-based policies in the Energy Element.

Goal 7: Inter-Jurisdictional Coordination. Implement applicable federal and state energy policy in cooperation with cities and communities.

- **Policy 7.1: Coordination with All Levels of Government.** Maintain awareness of national and state legislation and rulemaking, as well as energy policies of other local jurisdictions and private organizations, to keep the county's energy policies up-to-date.

Santa Barbara County Code

Santa Barbara County Code Article VI adopts the California Energy Code, 2019 Edition as the Primary Energy Code of the County. The California Energy Code has specific requirements for building design to reduce energy consumption, including the use of certain building materials to ensure a greater degree of energy efficiency during building operation and construction and energy efficiency standards for appliances, lighting amenities, and water fixtures, among other project components.

4.2.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This section evaluates construction related energy consumption from 2030 CAP development projects, taking into account existing energy regulations. 2030 CAP Measures and Actions are compared to existing state and County regulations to evaluate their consistency.

Significance Thresholds

Appendix G of the *State CEQA Guidelines* provides the following significance thresholds to determine if a project would have a potentially significant impact on energy:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The County's *Environmental Thresholds and Guidelines Manual* does not provide specific significance thresholds related to the analysis of a project's impacts related to energy. Therefore, the 2030 CAP's potential to result in impact related to energy is evaluated using the *CEQA Guidelines* Appendix G checklist questions, listed above, as qualitative thresholds of significance.

b. 2030 CAP Impacts and Mitigation Measures

Threshold a:	Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
Threshold b:	Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact E-1 THE 2030 CAP INCLUDES MEASURES AND ACTIONS THAT WOULD PROMOTE ENERGY EFFICIENCY IN SANTA BARBARA COUNTY, CONSISTENT WITH EXISTING ENERGY POLICIES. 2030 CAP-RELATED PROJECTS REQUIRING CONSTRUCTION ACTIVITIES WOULD CONSUME ENERGY RESOURCES; HOWEVER, CONSUMPTION OF ELECTRICITY AND PETROLEUM DURING CONSTRUCTION WOULD BE TEMPORARY, AND WOULD BE SUBJECT TO APPLICABLE STATE REGULATIONS, WHICH WOULD MINIMIZE WASTEFUL ENERGY USE. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

2030 CAP Purpose and Consistency with Energy Policies

The purpose and intended effect of the 2030 CAP is to reduce GHG emissions generated in Santa Barbara County, including those emissions generated by energy demand and supply, and as a result, to minimize the effects of climate change. The 2030 CAP includes Actions which would encourage energy efficiency in the transportation sector. These include Actions TR-2.1 through TR-2.10 which encourage active transportation, alternative transportation, require greater transit accessibility, and provide incentives for carpooling. Implementation of these Actions would ensure the 2030 CAP would not result in wasteful, inefficient, or unnecessary consumption of energy resources associated with transportation.

The 2030 CAP also includes Measures and Actions which would promote energy efficiency in compliance with State and local energy policy and encourage energy efficiency in existing and new buildings. Actions CE-1.1 through CE-1.11 promote renewable energy use and energy resilience by requiring the County to achieve 100 percent renewable electricity by 2030, requiring the County to restrict natural gas infrastructure for new development, and requiring the County to develop and adopt an ordinance that establishes building performance standards for GHG emissions reduction over time. Measure CE-1 requires increased clean energy use and energy resilience in new and existing buildings, exceeding the requirements of Title 24 of the California Code of Regulations. Action CE-1.5 requires the County to achieve 100 percent renewable energy for all residential and commercial customers through 2030, which would meet SB 100 requirements of 100 percent electricity procurement from renewable energy resources. Action W-3.2 require the County to track energy intensities of public water systems and adopt carbon reduction goals for the water system. Action W-3.3 requires the County to assess options for the expansion of renewable energy at the Laguna County Sanitary District water treatment plant. Several 2030 CAP Actions promote energy efficiency in Santa Barbara County. Implementation of these Actions would ensure the 2030 CAP

would not result in wasteful, inefficient, or unnecessary consumption of energy resources associated with buildings.

The 2030 CAP Measures and Actions are aligned with the goals and policies of the County's Energy Element which promote energy-efficiency, use of renewable energy resources, reduced dependency on vehicle travel, and increased water use efficiency. Furthermore, the 2030 CAP includes incentive-based actions such as Actions TR-3.3, CE-1.1, and CE-1.11, to reduce energy use, which is consistent with Goal 6 of the County's Energy Element to employ incentive-based policy measures. Overall, implementation of the 2030 CAP would assist in reducing the use of non-renewable energy resources, increasing the production of renewable energy, and retrofitting buildings and the transportation system in Santa Barbara County to become energy efficient in compliance with existing energy plans. Therefore, the 2030 CAP would not conflict or obstruct implementation of existing energy plans.

2030 CAP-Related Project Implementation

Implementation of 2030 CAP Measures and Actions would result in energy use associated with construction of 2030 CAP-related projects; however, energy use during construction of individual projects would be temporary. During construction activity, contractors would be required to comply with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would be required to utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce inefficient, wasteful, or unnecessary consumption of energy. Applicable regulatory requirements such as 2019 California's Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11), mandate that future infrastructure projects comply with construction waste management practices to divert a minimum of 65 percent of construction and demolition debris. These practices would result in efficient use of energy during construction of 2030 CAP-related projects. In the interest of both environmental awareness and cost efficiency, construction contractors would not reasonably be expected to utilize fuel in a manner that is wasteful or unnecessary. With adherence to applicable State regulations, implementation of 2030 CAP Measures and Actions would not result in wasteful or unnecessary energy use during related construction activities. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

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4.3 Greenhouse Gas Emissions

This section analyzes the potential impacts related to greenhouse gas (GHG) emissions and climate change resulting from implementation of the 2030 CAP.

4.3.1 Setting

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2); methane (CH_4); nitrous oxides (N_2O); fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs); and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a 100-year GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (United Nations Intergovernmental Panel on Climate Change [IPCC] 2021).

GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are usually by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (United States Environmental Protection Agency [USEPA] 2022a).

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record, which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The IPCC expressed in their Sixth Assessment Report that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities (IPCC 2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, a total of 2,390 gigatons of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by 47 percent, 156 percent, and 23 percent, respectively, primarily due to human activity (IPCC 2021). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

a. Types of Greenhouse Gases

Gases that are widely seen as the principal contributors to human-induced climate change include CO_2, CH_4, N_2O, fluorinated gases such as HFCs and PFCs, and SF_6. The following discusses the primary GHGs of concern.

Carbon Dioxide

Carbon dioxide is the primary GHG emitted by human activities. In 2020, CO_2 accounted for about 79 percent of all U.S. GHG emissions from human activities. CO_2 is naturally present in the atmosphere as part of the Earth's carbon cycle (the natural circulation of carbon among the atmosphere, oceans, soil, plants, and animals). Human activities are altering the carbon cycle, both by adding more CO_2 to the atmosphere and by influencing the ability of natural sinks, like forests and soils, to remove and store CO_2 from the atmosphere. While CO_2 emissions come from a variety of natural sources, human-related emissions are responsible for the increase that has occurred in the atmosphere since the industrial revolution (USEPA 2022a).

Methane

Methane is a colorless, odorless gas and is the major component of natural gas. In 2020, CH_4 accounted for about 11 percent of all GHG emissions generated by the United States from human activities. Human activities emitting methane include leaks from natural gas systems and the raising of livestock. Methane is also emitted by natural sources, such as natural wetlands. In addition, natural processes in soil and chemical reactions in the atmosphere help remove CH_4 from the atmosphere. Methane's lifetime in the atmosphere is much shorter than CO_2, but CH_4 is more efficient at trapping radiation than CO_2 (USEPA 2022a).

Nitrous Oxide

Nitrous oxide is a clear, colorless gas with a slightly sweet odor. In 2020, N_2O accounted for about seven percent of all GHG emissions generated by the United States from human activities. Human activities such as agriculture, fuel combustion, wastewater management, and industrial processes are increasing the amount of N_2O in the atmosphere. Nitrous oxide is also naturally present in the atmosphere as part of the Earth's nitrogen cycle and has a variety of natural sources. Nitrous oxide molecules stay in the atmosphere for an average of 114 years before being removed by a sink or destroyed through chemical reactions (USEPA 2022a).

Fluorinated Gases (HFCS, PFCS AND SF_6)

Unlike many other GHGs, fluorinated gases have no natural sources and are produced solely by human-related activities. They are emitted through their use as substitutes for ozone-depleting substances (e.g., as refrigerants) and through a variety of industrial processes, such as aluminum and semiconductor manufacturing. Many fluorinated gases have very high GWPs relative to other GHGs, meaning that small atmospheric concentrations can have disproportionately large effects on

global temperatures. They can also have long atmospheric lifetimes, lasting thousands of years in some cases. Like other long-lived GHGs, most fluorinated gases are well-mixed in the atmosphere, spreading around the world after they are emitted. Many fluorinated gases are removed from the atmosphere only when they are destroyed by sunlight in the far upper atmosphere. In general, fluorinated gases are the most potent and longest-lasting type of GHGs emitted by human activities (USEPA 2022a).

b. Greenhouse Gas Emissions Inventory

United States Emissions Inventory

Total GHG emissions generated by the U.S were 6,558 million metric tons (MMT) of CO_2e in 2019. Emissions decreased by 1.7 percent from 2018 to 2019. Since 1990, total U.S. emissions have increased by an average annual rate of 0.06 percent for a total increase of 1.8 percent between 1990 and 2019. The decrease from 2018 to 2019 reflects the combined influences of several long-term trends, including population changes, economic growth, energy market shifts, technological changes such as improvements in energy efficiency, and decrease carbon intensity of energy fuel choices. In 2019, the industrial and transportation end-use sectors accounted for 30 percent and 29 percent, respectively, of nationwide GHG emissions; while the commercial and residential end-use sectors accounted for 16 percent and 15 percent of nationwide GHG emissions, respectively, with electricity emissions distributed among the various sectors (USEPA 2022b).

California Emissions Inventory

Based on the California Air Resources Board (CARB) California GHG Inventory for 2000-2019, California produced 418.2 MMT of CO_2e in 2019 (CARB 2021). The largest single source of GHG emissions in California is transportation, contributing 40 percent of the State's total GHG emissions. Industrial sources are the second-largest source of the State's GHG emissions, contributing 21 percent (CARB 2021). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e (CARB 2021). The annual 2030 statewide target emissions level is 226 MMT of CO_2e (CARB 2022a).

Local Emissions Inventory

The 2030 CAP includes an emissions inventory of all GHGs emitted in the County in 2018. According to the emissions inventory, unincorporated Santa Barbara County generated approximately 1,426,540 metric tons (MT) of CO_2e in 2018. On-road transportation was the major source of GHG emissions in the County, accounting for 49 percent of the total, largely due to vehicle trips from cars and trucks. Natural gas used in buildings and facilities was the second largest source of emissions at 21 percent. Agriculture accounted for 14 percent, electricity used in buildings and facilities accounted for seven percent, off-road equipment accounted for five percent, solid waste accounted for four percent, and water/wastewater accounted for less than one percent, combined.

c. Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling

predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Each of the past three decades has been warmer than all the previous decades on record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature from 2015 to 2017 was approximately 1.0°C higher than the average global mean surface temperature over the period from 1880 to 1900 (National Oceanic and Atmospheric Administration 2020). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations jointly indicate that Land-Surface Air Temperature and sea surface temperatures have increased. According to California's Fourth Climate Change Assessment, statewide temperatures from 1986 to 2016 were approximately 0.6 to 1.1°C higher than those recorded from 1901 to 1960.

Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, larger forest fires, and more drought years (State of California 2018). In addition to statewide projections, California's Fourth Climate Change Assessment includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state and regionally specific climate change case studies (State of California 2018). However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that could be experienced in California because of climate change.

Air Quality

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century (State of California 2018). Higher temperatures are conducive to air pollution formation, and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone. The magnitude of the effect of the increased concentration of ground-level ozone, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. 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. The main air quality challenge in California, exacerbated by wildfire, is associated with Particulate Matter (State of California 2018).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the western United States, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring

snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (State of California 2018). The Sierra snowpack provides most of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack (State of California 2018). Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding (State of California 2018). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2022, observed by satellites, is approximately 3.6 millimeters per year, double the twentieth century trend of 1.4 millimeters per year (National Oceanic and Atmospheric Administration 2022). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. Sea level rise may jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018).

Agriculture

California has an over $50 billion annual agricultural industry that produces over a third of the country's vegetables and three-quarters of the country's fruits and nuts (California Department of Food and Agriculture 2023). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). Temperature increases could also change the time of year certain crops bloom or ripen, and thereby affect their quality (National Aeronautics and Space Administration 2021).

Ecosystems

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales. Soil moisture is likely to decline in many regions because of higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures would have negative impacts on California's ecosystems, leading to local species extinctions, migrations, and management challenges (State of California 2018).

4.3.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

On April 2, 2007, in *Massachusetts v. EPA* (549 U.S. 497 [2007]), the U.S. Supreme Court found GHGs are air pollutants covered by the Clean Air Act (CAA). The Court held the Administrator must determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA:

- **Endangerment Finding:** The Administrator finds the current and projected concentrations of six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds the combined emissions of these GHGs from new motor vehicles and new motor vehicle engines contribute to GHG pollution, which threatens public health and welfare.

These findings do not directly impose any requirements on industry or other entities. However, this action was a prerequisite for implementing GHG emission standards for vehicles (USEPA 2022c). In collaboration with the National Highway Traffic Safety Administration (NHTSA) and CARB, the USEPA developed emission standards for light-duty vehicles and heavy-duty vehicles (NHTSA et al. 2016; U.S. Government Publishing Office 2016).

Federal Fuel Efficiency Standards (CAFE)

Under the CAA, corporate average fuel economy (CAFE) standards have been set for passenger cars and light trucks. The State of California has traditionally had a waiver to set its own more stringent fuel efficiency standards. However, on August 2, 2018, the NHTSA and USEPA, operating under the direction of the Trump Administration, proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles. The SAFE Rule revokes a waiver granted by USEPA to the State of California under Section 209 of the CAA to enforce more stringent emission standards for motor vehicles than those required by USEPA for the explicit purpose of GHG reduction and proposed new CAFE standards for model years 2022 through 2026 which retained the model year 2020 standards through the model year 2026. On April 22, 2021, the Biden Administration formally proposed to roll back portions of the SAFE Rule, restoring California's right to enforce more stringent fuel efficiency standards (NHTSA 2022). On December 21, 2021 the NHTSA finalized rules to repeal the SAFE Rule. For further information on CAFE, refer to Section 4.2.2, *Regulatory Setting*, in Section 4.2, *Energy*.

b. State Regulations

California Global Warming Solutions Act of 2006 (Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279)

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the

main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others.

CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan.

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies (CARB 2017).

AB 1279, "The California Climate Crisis Act," was passed on September 16, 2022 and declares the State would achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative greenhouse gas emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045. The 2022 Scoping Plan lays out a path to achieve AB 1279 targets (CARB 2022a). The actions and outcomes in the 2022 Scoping Plan would achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Senate Bill 100 (100 Percent Clean Energy Act)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Senate Bill 375 (Sustainable Communities and Climate Protection Act)

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. Santa Barbara County Association of Governments (SBCAG) was assigned targets of a 13 percent reduction in GHGs from passenger vehicles by 2020 and a 17 percent reduction in GHGs from passenger vehicles by 2035 (CARB 2022b).

Executive Order B-55-18

On September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 32, SB 100, SB 375, and SB 1383.

CARB Innovative Clean Transit Regulations

In December 2018, CARB adopted the Innovative Clean Transit regulations, requiring all transit agencies to develop a plan to achieve zero emission bus fleets on or before 2040. Starting between 2023 and 2029, transit agencies must begin purchasing only zero-emission bus replacements and must have completed the fleet replacement program prior to 2040.

California Code of Regulations Title 24 (California Building Code)

Updated every three years through a rigorous stakeholder process, Title 24 of the California Code of Regulations requires California homes and businesses to meet strong energy efficiency and sustainability measures, thereby lowering their GHG emissions. The California Building Code is applicable to all development in California (Health and Safety Code Sections 17950 and 18938[b].

California Code of Regulations Title 24 Part 6 is the Building Energy Efficiency Standards which establishes energy efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission.

California Code of Regulations Title 24 Part 11 is the California Green Building Standards Code, commonly referred to as "CALGreen". CALGreen lays out the minimum requirements for newly constructed residential and non-residential buildings to reduce greenhouse gas emissions through improved efficiency and process improvements. It also includes voluntary tiers to encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

For additional discussion of the California Building Code energy efficiency and green building standards, refer to Section 4.2.2, *Regulatory Setting*, in Section 4.2, *Energy*.

California Model Water Efficient Landscape Ordinance

The revised Model Water Efficient Landscape Ordinance became effective on December 15, 2015. New development that includes landscaped areas of 500 square feet or more are subject to the following revised ordinance requirements:

- More efficient irrigation systems;
- Incentives for graywater usage;
- Improvements in on-site stormwater capture;
- Limiting the portion of landscape that can be planted with high water use plants; and
- Reporting requirements for local agencies.

c. Local Regulations

SBCAG Connected 2050 RTP/SCS

SBCAG's Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), titled Connected 2050, is the most recent RTP/SCS adopted by SBCAG, and it builds upon the goals, policies, and forecasts of preceding plans. Connected 2050 demonstrates that the SBCAG region would achieve emissions reductions consistent with targets set forth by SB 375. GHG reductions achieved through Connected 2050 would result in corresponding reductions in energy consumption in the region. The following Connected 2050 policies would be applicable to GHG impacts resulting from the 2030 CAP (SBCAG 2021):

- **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:
  - 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.
  - Preserve open space, agricultural land and sensitive biological areas.
  - Identify, minimize and mitigate adverse environmental impacts and, in particular, require mitigation of traffic impacts of new land development through on-site and related off-site improvements for all modes of transportation, including incentives to encourage the use of alternative transportation modes.
- **Policy 1.2: Air Quality.** Transportation planning and projects shall be designed to:
  - Lead to reductions in greenhouse gas and criteria pollutant emissions, consistent with the air quality goals of the region, including targets for greenhouse gas emissions from passenger vehicles in 2020 and 2035 as required by Senate Bill 375 (SB 375).
- **Policy 1.3: Alternative Fuels and Energy.** Transportation planning and projects shall:
  - Encourage the use of alternative fuels, and the application of advanced transportation and energy technologies to reduce vehicular emission production and energy consumption.
  - Promote renewable energy and energy conservation, consistent with applicable federal, State, and local energy programs, goals, and objectives.
- **Policy 2.3: Alternative Transportation Modes.** Transportation planning and projects shall:
  - Encourage alternatives to single-occupancy vehicle trips and the use alternative transportation modes to reduce vehicle miles traveled and increase bike, walk and transit mode share.
  - Provide for a variety of transportation modes and ensure connectivity within and between transportation modes both within and outside the Santa Barbara region. Alternative mode planning and projects shall be compatible with neighboring regions' transportation systems.
  - Plan and provide for ancillary support facilities for alternative transportation, such as bicycle parking.
  - Promote inter-regional commuter transit and rail service.

- Promote local and inter-city transit.

- **Policy 4.2: Public Health.** The RTP/SCS shall promote integrated transportation and land use planning that encourages:
  - Active transportation to promote alternative modes of transportation and physical activity (transit, biking and walking).
  - Development of "complete streets" which safely and conveniently accommodate all transportation modes, including active transportation.

Santa Barbara County Comprehensive Plan – Energy Element

The County's Comprehensive Plan contains goals and policies aimed at guiding future development within Santa Barbara County. The Energy Element contains goals and policies pertaining to the reduction of greenhouse gas emissions. Goals and policies relevant to the 2030 CAP include the following (County of Santa Barbara 2015):

Goal 1: Governmental Facilities and Operations. Provide for cost-effective and efficient use of energy in the facilities and operations owned by the County of Santa Barbara to reduce operating costs, mitigate adverse environmental impacts and set a good example in the community.

- **Policy 1.2: Retrofit Governmental Buildings.** County facilities shall be retrofitted to improve energy efficiency where improvements offer full return on investment in 5 years or less by way of energy savings.
- **Policy 1.4: Energy-Efficient Purchasing**. The County shall promote purchasing of energy-efficient equipment based on a fair return on investment, and shall use energy-savings estimates as one basis for purchasing decisions for major energy-using devices.
- **Policy 1.5: Governmental Vehicle Efficiency.** The County shall purchase fuel-efficient and alternatively fueled vehicles for the County fleet, to the maximum extent feasible.
- **Policy 1.6: Siting Governmental Facilities.** Promote coordination of new public facilities with mass transit service and other alternative transportation services, including bicycles, and design structures to enhance mass transit, bicycle, and pedestrian use.

Goal 2: Buildings. Foster development whose location, design, construction, and systems reduce the use of non-renewable energy resources in buildings and urban services.

- **Policy 2.1: Voluntarily Going Beyond State Building Energy Standards.** Establish mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards of the California Building Code (Title 24) in new and existing buildings by implementing energy efficiency measures.
- **Policy 2.4: Passive Solar Designs.** Encourage increased use of passive, solar design and daylighting in existing and new structures.
- **Policy 2.6: Retrofitting Buildings Audit/Rebate Programs**. Encourage homeowners, and commercial and industrial building owners to improve energy efficiency upon renovation of buildings.
- **Policy 2.7: Shade Trees:** The County shall maintain and expand the tree population to enhance the cooling benefits.

Goal 3: Transportation and Land Use. Provide a composition of land-uses and transportation programs that reduces dependency on automobiles.

- **Policy 3.1: Alternative Transportation and Support Facilities.** Enhance opportunities for alternative transportation.
- **Policy 3.5: Bikeways and Support Facilities.** The County shall consider the completion of an integrated bikeway system, linking residences with commercial centers, work locations, schools, parks and mass transit facilities to be a high priority for promoting the use of the bicycle as an alternative mode of transportation.
- **Policy 3.6: Pedestrian-Oriented Designs.** The County shall improve the convenience, comfort and safety for pedestrians.
- **Policy 3.7: Mixed-Use Developments.** Planning efforts shall focus on mixed-use development to reduce vehicular trips, where appropriate.
- **Policy 3.8: Employment Density Near Mass Transit**. The County shall coordinate office, commercial and industrial developments with mass transit service and existing or proposed bikeways.
- **Policy 3.9: Housing Density Near Mass Transit.** The County shall coordinate high density residential developments with mass transit service and existing or proposed bikeways.

Goal 4: Water Use and Solid Waste. Increase the efficiency of water and resource use to reduce energy consumption associated with various phases of using resources (pumping, distribution, treatment, heating, etc.).

- **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 4.7: 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.

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.

- **Policy 5.2: Alternative Energy Technologies.** The County shall encourage the use of alternative energy technology in appropriate new and existing development.
- **Policy 5.4: Solar Photovoltaic Equipment.** The County shall use solar photovoltaic equipment in county applications when it is cost-effective on a life-cycle cost basis.
- **Policy 5.9: Electric Vehicle Charging Facilities.** Encourage electric vehicle recharging infrastructure.
- **Policy 5.10: Alternatively Fueled Vehicles.** The County shall encourage the use of alternatively fueled vehicles by individuals.

Goal 6: Incentive Program. Employ a design approach which takes maximum advantage of incentive-based policy measures.

- **Policy 6.1: Incentive Program.** The County shall prepare an Incentive Program for implementing the incentive-based policies in the Energy Element.

Goal 7: Inter-Jurisdictional Coordination. Implement applicable federal and state energy policy in cooperation with cities and communities.

- **Policy 7.1: Coordination with All Levels of Government.** Maintain awareness of national and state legislation and rulemaking, as well as energy policies of other local jurisdictions and private organizations, to keep the county's energy policies up-to-date.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This analysis compares 2030 GHG emission projections based on a business-as-usual (BAU) forecast, a state-adjusted forecast (SB 32), and a 2030 CAP forecast. The analysis identifies GHG emissions reductions that would occur in accordance with 2030 CAP implementation. In addition, 2030 CAP Measures and Actions are compared to the goals and requirements of existing plans, policies, and regulations adopted for the purpose of reducing GHG emissions, to determine if 2030 CAP Measures and Actions are consistent with these plans, policies, and regulations.

Significance Thresholds

Appendix G of the *State CEQA Guidelines* provides the following significance thresholds to determine if a project would have a potentially significant impact on greenhouse gas emissions:

a. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Although the County has adopted interim GHG emissions thresholds of significance into the *Environmental Thresholds and Guidelines Manual*, the *Environmental Thresholds and Guidelines Manual* states that the adopted interim GHG emissions thresholds of significance shall not be used following the County's release and adoption of updated GHG emissions thresholds, which are incorporated in the 2030 CAP. Therefore, this analysis does not rely on use of the County's interim GHG emissions thresholds of significance.

b. 2030 CAP Impacts and Mitigation Measures

Threshold a:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 IMPLEMENTATION OF THE 2030 CAP WOULD RESULT IN SUBSTANTIAL GHG REDUCTIONS COMPARED TO THE BUSINESS-AS-USUAL SCENARIO AND THE SCENARIO IMPLEMENTING ONLY STATE GHG REDUCTION LAWS. THE 2030 CAP WOULD REDUCE OVERALL GHG EMISSIONS IN THE COUNTY, CONSISTENT WITH STATEWIDE LEGISLATION (SB 32). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The 2030 CAP provides a GHG emissions projections for unincorporated Santa Barbara County. The GHG emissions projections are based on a BAU forecast, a state-adjusted forecast, and a 2030 CAP forecast. The BAU assumes emissions would continue to occur if consumption and growth trends continue as projected by the County. The state-adjusted forecast includes GHG reductions that are expected to occur as a result of adopted state laws designed to reduce GHG emissions (ex. 2019 Title 24 Building Energy Efficiency Standards, SB 100). The 2030 CAP forecast includes GHG reductions expected to occur in accordance with 2030 CAP implementation and implementation of state law. GHG emission projections are shown in Table 4.3-1.

Table 4.3-1 Santa Barbara County GHG Emissions Inventory and Projections

Scenario	2030 (MT CO_2e per year)
Business-As-Usual	1,371,850
State-Adjusted Forecast	1,163,184
2030 CAP Forecast	781,296

Source: 2030 CAP

As shown in Table 4.3-1, the BAU scenario forecasts countywide GHG emissions in 2030 would total approximately 1,371,850 MT CO_2e per year. Statewide initiatives would reduce countywide GHG emissions in 2030 to approximately 1,163,184 MT CO_2e per year. Implementation of the 2030 CAP, alongside state laws, would reduce countywide GHG emissions in 2030 to approximately 781,296 MT CO_2e per year.

The Measures and Actions included in the 2030 CAP, combined with statewide legislation, would enable the County to meet the state's SB 32 emissions reduction target of 40 percent below 1990 levels by 2030. SB 32 is an interim target toward meeting the State's 2045 goal of carbon neutrality, and implementation of the 2030 CAP would result in substantial progress toward meeting the State's long-term GHG reduction goals. Implementation of the 2030 CAP Measures and Actions could result in temporary GHG emissions resulting from construction of 2030 CAP-related projects; however, these impacts would be short-term, intermittent, and minimal. The overall GHG emissions reductions that be achieved through implementation of the 2030 CAP would render construction-related GHG emissions from 2030 CAP-related projects inconsequential. Since the 2030 CAP would reduce overall greenhouse gas emissions, consistent with Statewide legislation establishing reduction targets (SB 32), the 2030 CAP would not have a significant impact on the environment.

Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

Threshold b:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2 THE 2030 CAP WOULD NOT CONFLICT WITH APPLICABLE PLANS, POLICIES OR REGULATIONS ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GHGS, AS THE 2030 CAP IS A POLICY DRIVEN DOCUMENT INTENDED TO REDUCE GHGS. THE 2030 CAP WOULD ACHIEVE GHG REDUCTION TARGETS ESTABLISHED BY SENATE BILL 32 AND WOULD INCLUDE MEASURES AND ACTIONS PROMOTING THE GOALS OF APPLICABLE PLANS, POLICIES, AND REGULATIONS, SUCH AS SBCAG'S CONNECTED 2050, SENATE BILL 100, INNOVATIVE CLEAN TRANSIT REGULATIONS, THE CALIFORNIA MODEL WATER EFFICIENT LANDSCAPE ORDINANCE, TITLE 24 OF THE CALIFORNIA CODE OF REGULATIONS, AND THE COUNTY'S ENERGY ELEMENT. THEREFORE, THERE WOULD BE NO IMPACT.

The 2030 CAP is a policy document that would set strategies to reduce GHG emissions within Santa Barbara County, in compliance with State regulations. The purpose of the 2030 CAP is to meet Santa Barbara County's proportional fair share of the statewide emissions reduction target established by SB 32, which the 2030 CAP achieves through implementation of its Measures and Actions. Additionally, the 2030 CAP contributes toward meeting the state's goal of carbon neutrality in 2045 established by Executive Order B-55-18 and assists in making progress toward the County's reduction goal of 50 percent below 2018 baseline emissions by 2030.

The 2030 CAP would implement Measures and Actions promoting alternative transportation, thereby reducing GHG emissions associated with vehicle travel. This reduction in vehicle GHG emissions would align with the policies of SBCAG's Connected 2050, assisting in achieving SBCAG's assigned SB 375 target of a 17 percent reduction in GHGs from passenger vehicles by 2035. The 2030 CAP includes Action CE-1.5, which requires the County to achieve 100 percent renewable energy for all residential and commercial customers through 2030, meeting SB 100 requirements of 100 percent electricity procurement from renewable energy resources. 2030 CAP Action TR-1.7 would require the County to transition medium and heavy-duty fleet vehicles to zero emissions vehicles by 2035, promoting CARB's Innovative Clean Transit Regulations. 2030 CAP Measure W-3 intends to increase energy- and carbon-efficiency of water systems, and Action W-3.2 requires water intensity tracking for the purpose of adopting carbon-reduction goals for public water systems, promoting the requirements of the California Model Water Efficient Landscape Ordinance. 2030 CAP Measure CE-1 requires increased clean energy use and energy resilience in new and existing buildings, exceeding the requirements of Title 24 of the California Code of Regulations. Furthermore, 2030 CAP Measures and Actions align with the goals and policies of the County's Energy Element, which promote energy-efficiency, use of renewable energy resources, reduced dependency on vehicle travel, and increased water use efficiency.

Since the 2030 CAP would promote State and local plans, policies, and regulations adopted for the purpose of reducing greenhouse gas emissions, the 2030 CAP would be consistent with plans, policies, and regulations adopted for the purpose of reducing greenhouse gas emissions.

Mitigation Measures

No mitigation measures are required because there would be no impact.

4.4 Transportation

This section analyzes the potential effects of the 2030 CAP on transportation, including conflicts with applicable transportation plans, conflicts with *CEQA Guidelines* Section 15064.3(b), transportation hazards/incompatible uses, and emergency access.

4.4.1 Setting

a. Freeway and Highway Network

Santa Barbara County is served by a multi-modal transportation system that facilitates circulation. Major freeways and highways include United States Route 101 (U.S. 101) and State Routes (SR) 1, 135, 154, 166, 192, and 246. Brief descriptions of these routes are provided below.

United States Route 101

U.S. 101 functions as the region's main travel corridor, connecting Santa Barbara County to Ventura and Los Angeles Counties to the south and San Luis Obispo and other northern California counties to the north. Within Santa Barbara County, U.S. 101 extends westward from the Ventura County line and through the South Coast portion of the County and then northward through the Gaviota area and Santa Maria Valley to the San Luis Obispo County line. U.S. 101 runs for approximately 90 miles in Santa Barbara County, primarily as a limited-access freeway, with instances of side street and driveway access in rural areas.

State Route 1

SR 1 extends west from U.S. 101 near Gaviota and curves northwest through the City of Lompoc, Vandenberg Air Force Base, and rural areas of the Santa Maria Valley to the San Luis Obispo County line, just north of the City of Guadalupe. The segment of SR 1 between U.S. 101 and the City of Lompoc is a 2-lane rural highway, heavily utilized by commuters living in the Lompoc Valley and working in the South Coast area.

State Route 135

SR 135 is a four- to six-lane highway serving as the primary north-south route through the Santa Maria/Orcutt area. SR 135 connects to SR 1 approximately five miles northeast of Vandenberg Air Force Base and connects to U.S. 101 at Los Alamos.

State Route 154

SR 154 is a rural two-lane highway that extends north from U.S. 101 in the city of Santa Barbara, through the Lake Cachuma and Los Olivos areas in the Santa Ynez Valley, to U.S. 101 approximately 4.5 miles north of Buellton.

State Route 166

In Santa Barbara County, SR 166 is a two to four-lane highway that extends east from Guadalupe to U.S. 101 in Santa Maria. SR 166 continues east over the mountain range to the Cuyama Valley, SR 166 road meanders through the mountains, portions lie within San Luis Obispo County.

State Route 192

SR 192 is a two-lane highway that extends west from SR 154 and through the Santa Barbara foothills to Route 150 in Carpinteria. SR 192 provides access to residential areas in Mission Canyon, Montecito, Summerland, and Carpinteria and serves as an alternate route to U.S. 101 on the South Coast. Through the Carpinteria Valley, SR 192 serves numerous agricultural land properties. As a result of passing through residential areas, SR 192 features many driveways and access points.

State Route 246

SR 246 is a two to four-lane highway that extends east from Lompoc and through the Santa Ynez Valley to its terminus at SR 154, east of Solvang. SR 246 is the primary connection between communities in the Lompoc Valley and Santa Ynez Valley.

b. Transit Services/Agencies

A number of different transit agencies provide public transit services in Santa Barbara County, including the Santa Barbara Metropolitan Transit District (MTD), Santa Maria Regional Transit (SMRT), Santa Ynez Valley Transit (SYVT), Clean Air Express, City of Lompoc Transit (COLT), Santa Maria Organization of Transportation Helpers (SMOOTH), and Easy Lift Transportation. These transit agencies and their services are briefly described below.

Santa Barbara Metropolitan Transit District

MTD is the primary provider of fixed-route transit services in the South Coast area of Santa Barbara. MTD offers 42 transit routes and delivers approximately 2,627,848 annual service miles. According to MTD, in Fiscal Year 2021-2022, concluding in June 2022, MTD served 4,082,287 passenger trips (MTD 2023; MTD 2022).

Santa Maria Regional Transit

In the Santa Maria Valley, transit service is provided by SMRT. SMRT provides transit service through northern unincorporated Santa Barbara County between Santa Maria and Lompoc, and through th Santa Maria to the cities of Buellton and Solvang. SMRT utilizes U.S. 101 and SR 1 to provide transportation in northern unincorporated Santa Barbara County (SMRT 2022).

Santa Ynez Valley Transit

SYVT provides fixed-route and paratransit services between Buellton, Solvang, Santa Ynez, Ballard, and Los Olivos (SYVT 2022).

Clean Air Express

The Santa Barbara County Association of Governments (SBCAG) operates the Clean Air Express commuter services from the communities of Santa Maria, Lompoc, and the Santa Ynez Valley to the City of Goleta and the City of Santa Barbara. In Fiscal Year 2018-2019, the Clean Air Express served 179,026 passenger trips (SBCAG 2023).

City of Lompoc Transit

COLT provides service in the Lompoc area, including the unincorporated areas of Mission Hills and Vandenberg Village (SBCAG 2021).

Santa Maria Organization of Transportation Helpers and Easy Lift Transportation

The Santa Maria Organization of Transportation Helpers (SMOOTH) and Easy Lift Transportation serve as the Consolidated Transportation Service Agencies (CTSA) for transit between Santa Maria and Guadalupe, and the South Coast, respectively. Both agencies provide senior dial-a-ride, and Americans with Disabilities paratransit services (SMOOTH 2023; Easy Lift Transportation 2023).

c. Pedestrian and Bicycle Facilities

The region's pedestrian network is expansive and an inventory of the network at the regional scale has not been completed. A complete sidewalk network is present in most of Santa Barbara County's urbanized areas. Where deficiencies exist, local agencies continuously work to fill gaps and improve the network. Santa Barbara County provides funding for pedestrian network improvements which connect residential areas to schools (SBCAG 2021).

Santa Barbara County's bicycle network consists of 338 miles of bikeways. Portions of the California Pacific Coast Bike Route and the California Coastal Trail run through Santa Barbara County. Bikeways in Santa Barbara include the following categories, as defined by the State of California (SBCAG 2021):

- **Class I:** A Class I bikeway, or a bike path, is a multi-purpose trail that is completely separated from motor vehicle traffic.
- **Class II:** A Class II bikeway, or a bike lane, is an on-street lane dedicated to one-way bicycle travel adjacent to motorized travel lanes.
- **Class III:** A Class III bikeway, or bike route, are on-street shared facilities. Class III bikeways serve to provide continuity to other bicycle facilities or designate a preferred route through high demand corridors. These routes are typically demarcated using sharrows and/or signage.
- **Class IV:** A Class IV bikeway, also known as cycle tracks, are exclusive bicycle infrastructure that are 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.

4.4.2 Regulatory Setting

a. Federal Regulations

United States Department of Transportation

The United States Department of Transportation (USDOT) provides a number of grant programs, primarily for the construction and upgrading of major highways and transit facilities. Many of these grants are administered by the state and regional governments. Use of federal grant funding also invokes the National Environmental Protection Act (NEPA), in some cases.

b. State Regulations

California Department of Transportation

The California Department of Transportation (Caltrans) is responsible for the planning, design, construction and maintenance of all interstate freeways and state routes. Caltrans builds, maintains,

and operates the State Highway System in California with a goal to facilitate the safe and efficient use of the state transportation system for all users. Caltrans sets standards in its 2020 Transportation Impact Study Guide that focus on the vehicle miles traveled (VMT) metric. The document is intended to be a reference and informational document that aligns with the standards and thresholds established in the Governor's Office of Planning and Research's (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA*. This document is available to be used by local governments to uniformly review transportation analysis and assess the operational standards of Caltrans-maintained facilities. The 2020 Transportation Impact Study Guide acts as a replacement for the 2002 Guide for the Preparation of Traffic Impact Studies but is only intended to be used with local land use projects and plans, not to be used for transportation projects on the State Highway System.

Statewide Transportation Improvement Plan

The Statewide Transportation Improvement Plan (STIP) is a capital improvement program that plans transportation projects related to state facilities in California for the next five years. The program is updated every two years with new construction projects as more funding is provided. The California Transportation Commission approves the fund estimate and then Caltrans and regional planning agencies submit plans for transportation improvement projects. If the projects are programmed in the STIP, then relevant agencies can begin the implementation process.

Complete Streets Act

The Complete Streets Act was signed into law as Assembly Bill (AB) 1358 in 2008. It requires that cities and other public agencies incorporate "complete street" policies and principles into their General Plans and Updates within the Circulation Elements, so that the plan addresses the needs of all users, including bicyclists and pedestrians. Caltrans Deputy Directive 64 (DD-64-R1 October 2008) embraces the Complete Streets Act and its incorporation into all phases of state highway projects, from planning to construction to maintenance and repair.

Assembly Bill 32 and Senate Bill 375

With the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements. On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. Santa Barbara County Association of Governments (SBCAG) was assigned targets of a 13 percent reduction in GHGs from passenger vehicles by 2020 and a 17 percent reduction in GHGs from passenger vehicles by 2035 (CARB 2022).

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target. The RTP and SCS are further described below.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on eight-year schedules. In addition, Regional Housing Needs Allocation (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional transportation planning agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

Senate Bill 743

SB 743, which was signed into law in 2013, directed OPR to develop revisions to the *CEQA Guidelines* by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics instead of traffic level of service (LOS). SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." SB 743 changes the way that public agencies evaluate the transportation impacts of projects in accordance with CEQA by recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (see Pub. Resource Code, § 21099, subd. [b][2]).

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines*, which had been released on August 6, 2014. Of note was the updated text of the proposed new *CEQA Guidelines* Section 15064.3 which discusses the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, *CEQA Guidelines* Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the *CEQA Guidelines*, and the updated guidelines became effective on December 28, 2018. OPR's updated guidelines states the following about transit and active transportation projects (OPR 2018):

> Transit and active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and bus rapid transit projects, and bicycle and pedestrian infrastructure projects. Streamlining transit and active transportation projects aligns with each

of the three statutory goals contained in SB 743 by reducing GHG emissions, increasing multimodal transportation networks, and facilitating mixed use development.

c. Local Regulations

SBCAG Connected 2050 RTP/SCS

SBCAG is required by State and federal law to prepare, update, and adopt a Regional Transportation Plan (RTP) every four years. The most recent update to the RTP was completed by SBCAG in 2021 and sets forth long-range transportation planning goal describing how the region will meet its transportation needs for the 30-year period from 2020 to 2050. The 2050 RTP/SCS analyzes the transportation needs of the region into the future and identifies project priorities in order to improve the transportation system. The 2050 RTP/SCS uses existing and future land use patterns and forecasted population and job growth to identify and prioritize transportation projects for all modes of transportation including highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as transportation demand management measures and intelligent transportation systems (SBCAG 2021).

All transportation projects that use State and federal funds, or that could significantly affect transportation in Santa Barbara County must be included in the RTP/SCS. The RTP/SCS offers a mix of mobility options and commits to a more sustainable transportation system through investments in public transportation, active transportation, highways, streets, and roads, and system efficiency. The 2050 RTP includes five goal areas – Environment, Mobility & System Reliability, Equity, Health & Safety, and Prosperous Economy – with respective policies to meet each of the goal areas. These policies are expected to result in significant benefits to the region, not only with respect to transportation and mobility, but also economic activity, safety, and social equity. The following list summarizes the most applicable policies which relate to the 2030 CAP (SBCAG 2021):

- **Policy 1.3 Alternative Fuels and Energy.** Transportation planning and projects shall:
  1. Encourage the use of alternative fuels, and the application of advanced transportation and energy technologies to reduce vehicular emission production and energy consumption.
  2. Promote renewable energy and energy conservation, consistent with applicable federal, State, and local energy programs, goals, and objectives.

- **Policy 2.3: Alternative Transportation Modes.** Transportation planning and projects shall:
  1. Encourage alternatives to single-occupancy vehicle trips and the use alternative transportation modes to reduce vehicle miles traveled and increase bike, walk and transit mode share.
  2. Provide for a variety of transportation modes and ensure connectivity within and between transportation modes both within and outside the Santa Barbara region. Alternative mode planning and projects shall be compatible with neighboring regions' transportation systems.
  3. Plan and provide for ancillary support facilities for alternative transportation, such as bicycle parking.
  4. Promote inter-regional commuter transit and rail service.
  5. Promote local and inter-city transit.

6. Work to complete the California Coastal Trail through provision and implementation of trail segments and connections in coordination with the California State Coastal Conservancy, California Department of Parks and Recreation, California Coastal Commission, Caltrans, and other agencies.

- **Policy 2.6: Consistency with Other Plans.**
  1. The planning, construction, and operation of transportation facilities shall be consistent with all relevant plans, including, but not limited to: (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, (4) short-range transit plans, and (5) other regional policies.

- **Policy 4.2: Public Health.** The RTP/SCS shall promote integrated transportation and land use planning that encourages:
  1. Active transportation to promote alternative modes of transportation and physical activity (transit, biking and walking).
  2. Development of "complete streets" which safely and conveniently accommodate all transportation modes, including active transportation.

Santa Barbara County Comprehensive Plan – Circulation Element

The Santa Barbara County Comprehensive Plan's Circulation Element 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 the Circulation Element is to provide clear traffic capacity guidelines, 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. Circulation Element policies 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 or area plan. Circulation Element Policy C is relevant to the 2030 CAP (Santa Barbara County 2014):

- **Policy 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.

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

2030 CAP Measures and Actions were compared to the policies of SBCAG's Connected 2050 RTP/SCS and the County's Circulation Element to determine the 2030 CAP's consistency with these plans. Based on 2030 CAP Measures and Actions, reasonably foreseeable 2030 CAP-related projects were evaluated to determine their potential to increase VMT in Santa Barbara County. Potential 2030 CAP-related projects were compared to existing State and County regulations to determine if the 2030 CAP could result in substantial transportation hazards or result in inadequate emergency access with application of State and County regulations.

Significance Thresholds

Appendix G of the State *CEQA Guidelines* and the County's *Environmental Thresholds and Guidelines Manual* provide the following significance thresholds to determine if a project would have a potentially significant impact on transportation:

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 Section 15064.3, subdivision (b);
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
d. Result in inadequate emergency access.

The *CEQA Guidelines* and SB 743 changed the criteria for determining what constitutes a significant transportation-related environmental impact to rely upon quantification of VMT instead of level of service. *CEQA Guidelines* Section 15064.3(c) states that the requirement to use the VMT criteria applies on and after July 1, 2020. In September 2020, Santa Barbara County approved an amendment to the County's *Environmental Thresholds and Guidelines Manual*, which included adoption of VMT thresholds of significance and analysis methodologies. The County adopted thresholds identical to those recommended in the Office of Planning and Research guidelines.

b. 2030 CAP Impacts and Mitigation Measures

Threshold a:	Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE 2030 CAP WOULD NOT CONFLICT WITH THE SANTA BARBARA COUNTY ASSOCIATION OF GOVERNMENT'S CONNECTED 2050 RTP/SCS, THE COUNTY'S CIRCULATION ELEMENT, OR ANY OTHER APPLICABLE PROGRAM, PLAN, ORDINANCE, OR POLICY RELEVANT TO THE TRANSPORTATION SYSTEM. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The Measures and Actions included in the 2030 CAP are consistent with the goals and policies of SBCAG's Connected 2050 RTP/SCS and the County's Circulation Element. A discussion of the 2030 CAP's consistency with each of these plans is provided below.

Connected 2050 RTP/SCS

The 2030 CAP would implement specific Actions which are consistent with the Connected 2050 RTP/SCS. Action TR-2.10 would direct the County to develop an ordinance which requires large employers to meet vehicle trip and emissions reduction goals consistent with the Connected 2050 RTP/SCS. The 2030 CAP includes Actions which would promote alternative fuels and energy, alternative transportation modes, and active transportation consistent with Connected 2050 RTP/SCS Policies 1.3, 2.3, and 4.2. These include, but are not limited to, Action TR-2.2, which would require the County to identify areas for road diets and complete streets along roadways in urban areas and repurpose the additional lanes for active transportation infrastructure including sidewalks and bike lanes, and Action TR-2.9, which would require the County to convert underutilized County parking facilities to support commuter park-and-ride and electric bike share.

Implementation of the Measures and Actions in the 2030 CAP would reduce GHG emission from vehicle travel, assisting SBCAG in meeting their SB 375 emissions reduction requirements. As

described below, the 2030 CAP is consistent with the County's Circulation Element, fulfilling Connected 2050 RTP/SCS Policy 2.6, which requires consistency with adopted local General Plans. Furthermore, SBCAG is listed as a partner on 2030 CAP Actions TR-1.6, TR-2.2, TR-2.4 through TR-2.10, and TR-2.12, ensuring SBCAG is involved during implementation of transportation-related Actions in the 2030 CAP. This would ensure the 2030 CAP is consistent with the Connected 2050 RTP/SCS, and furthermore assist to implement SBCAG's transportation goals.

Circulation Element

The County's Circulation Element promotes the use of alternative modes of transportation and implementation of transportation demand ordinances. The 2030 CAP includes Measures and Actions that are consistent with the County Circulation Element Policy C, which encourages the use of alternative modes of transportation. Measures and Actions include Measure TR-1, promoting increased use of zero emission vehicles, and Actions TR-1.6, TR-2.7, TR-2.10, TR-2.11, which would incentivize the use of E-bikes, promote increased transit services and discounted transit passes for low-income commuters, require the County to develop an ordinance which requires large employers to meet vehicle trip and emissions reduction goals, and implement incentives for County employees to commute using carpool or alternative modes of transportation. Once implemented, the 2030 CAP would promote alternative transportation consistent with Policy C of the County's Circulation Element. Therefore, the 2030 CAP would be consistent with the County's Circulation Element.

Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

Threshold b:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 THE 2030 CAP WOULD IMPLEMENT SPECIFIC ACTIONS WHICH WOULD REDUCE VMT FOR RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL SECTORS THROUGHOUT THE COUNTY. THE 2030 CAP WOULD RESULT IN A REDUCTION OF COUNTYWIDE VMT. THEREFORE, THE 2030 CAP WOULD NOT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The 2030 CAP implements the following Actions designed to reduce VMT for residential and commercial/industrial sectors:

- **TR-1.6: E-Bike Incentivization.** Partner with community groups to obtain external funding for a pilot bike-share program in low-income communities and to connect low-income communities with the E-Bike Purchase Incentive Program through CalBike.
- **TR-2.2: Active Transportation Plan Implementation.** Prioritize and implement the programs and projects identified in the Active Transportation Plan with the highest VMT reduction potential. Identify areas for road diets and complete streets along roadways in urban areas and repurpose the additional lanes for active transportation infrastructure including sidewalks and bike lanes.
- **TR-2.3: Local Food Systems.** Reduce trips and trip lengths of food distributors by supporting local businesses that enhance access, equity, and resilience in the regional food system, such as cooperative food kitchens. Reduce trips and trip lengths of food consumers by leading or supporting efforts to obtain external funding to increase local food cultivation and access through community gardens, food forests, home gardening, community farming, and more.

- **TR-2.4: Regional VMT Mitigation Program.** Lead or support the establishment of a regional transportation VMT bank to identify and direct funding to unfunded transportation infrastructure and programs.
- **TR-2.7: Transit Accessibility & Reliability**. Partner with transit providers to increase transit service and provide subsidized or discounted transit passes for low-income commuters.
- **TR-2.8 LOSSAN Rail Ridership.** Work with the LOSSAN Rail Corridor Agency to increase commuter rider services.
- **TR-2.9: Park and Ride Expansion.** Convert underutilized County parking facilities to support commuter park-and-ride and electric bike share.
- **TR-2.10: Employer Trip Reduction Requirements & Programs.** Develop an ordinance that requires large employers, including the County, to meet vehicle trip and emission reduction goals, or pay non-compliance fees to expand transit and commuter services and resources. Partner with SBCAG to work with large employers within the unincorporated County achieve a 50-80% telework participation rate by eligible employees able to work remotely consistent with Connected 2050 RTP/SCS.
- **TR-2.11: Carpool & Vanpool Incentives.** Incentivize County employees to reduce the number of car trips by increasing rewards for carpooling, transit, and non-vehicular commuting. Conduct a feasibility study to implement employee parking fees. Partner with CalVans to promote use of the Vanpool Program to employers and employees, including the County. Consider offering incentives to increase rider participation for CalVans and transit.
- **TR-2.12: Broadband Accessibility.** Work with SBCAG to increase internet access and speed to support telecommuting and remote workforce participation, especially in rural areas of the County.

According to OPR's *Technical Advisory On Evaluating Transportation Impacts in CEQA*, transit and active transportation projects generally reduce VMT, and are therefore presumed to result in less than significant impacts on transportation. OPR applies this presumption to passenger rail projects, bus and bus rapid transit projects, and bicycle and pedestrian infrastructure projects. The majority of the 2030 CAP Actions promote active transportation development and transit improvements, which, accordingly, would be presumed to have less than significant VMT impacts. Based on the *GHG Emissions Reductions Technical Evidence,* prepared for the 2030 CAP, VMT reductions from implementation of Measure TR-2 and associated actions are anticipated to result in a reduction of 261,930,723 VMT compared to SBCAG's Connected 2050 baseline year of 2015 which represents the most recently available year for which countywide VMT data is available (Appendix C). Therefore, the 2030 CAP would not result in substantial VMT and would not conflict or be inconsistent with *CEQA Guidelines* Section 15064.3(b). This impact would be less than significant.

Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

Threshold c:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?
Threshold d:	Would the project result in inadequate emergency access?

Impact TRA-3 2030 CAP-RELATED PROJECTS WOULD BE REQUIRED TO ADHERE TO APPLICABLE REGULATIONS TO ENSURE EMERGENCY ACCESS IS MAINTAINED, SUCH AS THE CALIFORNIA DEPARTMENT OF TRANSPORTATION'S MANUAL OF UNIFORM TRAFFIC CONTROL DEVICES, THE COUNTY CODE, AND THE ACCESS REQUIREMENTS OF THE APPLICABLE FIRE DEPARTMENT. WITH ADHERENCE TO APPLICABLE REGULATIONS, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Implementation of some 2030 CAP Actions may cause intermittent and temporary traffic interferences due to construction. However, existing State and County regulations minimize the potential for 2030 CAP-related projects to result in inadequate emergency access. For example, temporary construction barricades or other obstructions that could impede emergency access on State highway systems/routes would be subject to the standards set forth in the California Manual of Uniform Traffic Control Devices (Manual) (Caltrans 2021). The Manual requires the creation and approval of temporary traffic control plans to be used for facilitating road users through a work zone (Caltrans 2021). Pursuant to County Code Section 28-31 and Section 28-33, construction activities, which have been granted a permit occurring on County roads, would be required to maintain safe crossing for two lanes of vehicle traffic at all road intersections, and are required to take measures to maintain traffic conditions, subject to the County Road Commissioner.

2030 CAP-related projects would be required to be designed in accordance with applicable fire department standards, including standards set by the Santa Barbara County Fire Department, Carpinteria-Summerland Fire Protection District, and Montecito Fire Protection District, if applicable. Standards include those that address minimum driveway width, signage and addressing, fire hydrants, fire sprinklers, and emergency access. Furthermore, in accordance with standard development review procedures, plans for projects promoted by 2030 CAP Actions would be submitted to the County for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing fire department regulations. 2030 CAP-related projects would be reviewed by County staff to ensure consistency with all applicable design standards, including standards for project access points, location, and design, sight lines, roadway modifications, and provisions for bicycle and pedestrian transportation connections. Through adherence to applicable state and County regulations, the 2030 CAP would not introduce development resulting in transportation design hazards or inadequate emergency access. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

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5 Other CEQA-Required Discussions

This section discusses growth-inducing impacts and significant irreversible environmental impacts that would be caused by the 2030 CAP.

5.1 Growth Inducement

Section 15126(d) of the *CEQA Guidelines* requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. 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. The 2030 CAP's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

The 2030 CAP would support development allowed in accordance with the land use assumptions of the County's Comprehensive Plan. The 2030 CAP is a policy document that does not include specific development proposals that would induce population growth. Implementation of 2030 CAP Actions would not directly result in increases in population. Similarly, the 2030 CAP would not directly result in an increase in employment, and new employment opportunities that may result indirectly from implementation of 2030 CAP Actions would target existing residents and not induce population growth. The 2030 CAP includes Measure TR-2 to encourage affordable housing and mobility options in collaboration with the Santa Barbara County Association of Governments (SBCAG) and consistent with the growth projections within SBCAG's Connected 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). No changes to the County Comprehensive Plan land use designations are proposed. Therefore, the 2030 CAP would not result in an unplanned increase in population or housing outside of what was accounted for in the County's Comprehensive Plan and SBCAG's RTP/SCS.

5.2 Irreversible Environmental Effects

Section 15126.2(c) of the *CEQA Guidelines* requires a discussion of significant irreversible environmental changes that would occur as a result of a proposed project.

The 2030 CAP does not propose any change in land use or zoning. Implementation of the 2030 CAP would occur in accordance with existing County-designated land use and zoning. The 2030 CAP does not include proposals for individual development projects, and future project locations would not be committed to any particular land use as a result of the 2030 CAP.

The 2030 CAP would set a framework for Santa Barbara County to achieve the State's goal of reducing emissions by 40 percent from 1990 levels by 2030. The Measures and Actions included in the 2030 CAP encourage improvements to housing, transportation, clean energy, and utility infrastructure. These Measures and Actions may indirectly result in construction activities which would require the use of fuel and building materials during construction. However, the result of the improvements would be a long-term reduction in energy consumption and a reduction in the use of nonrenewable energy sources. As discussed in Section 4.2, *Energy*, continued operation and maintenance of some 2030 CAP-related projects may require the additional use of fuel

consumption; however, such use would be incremental compared to the overall reduction in use of these resources that would result from implementation of the 2030 CAP. Therefore, no significant irreversible environmental changes would occur as a result of the 2030 CAP.

5.3 List of Significant and Unavoidable Impacts

As discussed in Sections 4.1 through 4.4 of the EIR, implementation of the 2030 CAP would not result in any significant and unavoidable impacts.

6 Alternatives

CEQA requires a lead agency to analyze a reasonable range of alternatives to a proposed project that could feasibly attain most of the basic objectives of the project (stated in Section 2 of this EIR) while substantially reducing or eliminating significant environmental impacts.

As discussed in Section 2, *Project Description*, the objectives for the 2030 Climate Action Plan (CAP), are as follows:

- Quantify GHG emissions in Santa Barbara County in a GHG inventory.
- Provide a road map to achieve GHG reductions that meet the State's SB 32 reduction target of 40 percent below baseline emissions by 2030, with an aspirational goal to meet the County's GHG emissions reduction target goal of 50 percent below baseline emissions by 2030.
- Demonstrate a level of GHG emissions below which future projects covered by the 2030 CAP would not have a cumulatively considerable contribution to GHG impacts.
- Serve as a Qualified Greenhouse Gas Emissions Reduction Plan to provide CEQA streamlining for future development projects.

This section of the EIR describes the key considerations used to identify and screen potential alternatives, explains why some potential alternatives were eliminated from further consideration, and describes the alternatives that were carried forward for more detailed analysis.

This chapter also compares the environmental impacts of the 2030 CAP and alternatives evaluated in detail. This comparison is based on the analysis of environmental impacts of the 2030 CAP, provided in Chapter 4, *Environmental Impact Analysis*, and the alternatives that were carried forward for more detailed review.

6.1 Alternatives Development and Screening

The County screened and selected alternatives to be discussed based on the following key provisions of the State *CEQA Guidelines* (California Code of Regulations Title 14, Section 15126.6):

- The discussion of alternatives shall consider a reasonable range of potentially feasible alternatives to the proposed project or its location that are capable of avoiding or substantially lessening any significant impacts of the proposed project, even if these alternatives would impede to some degree the attainment of the proposed project objectives, or would be costlier.
- The No Project Alternative shall be evaluated, along with its impacts. The no project analysis shall discuss the existing conditions at the time the notice of preparation was published, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason," meaning the EIR must evaluate only those alternatives necessary to permit a reasoned choice.
- An EIR need not consider an alternative whose impacts cannot be reasonably ascertained and whose implementation is remote and speculative.

Among the factors that may be considered in determining whether to carry a potential alternative forward for more detailed consideration in an EIR are:

1. Whether the alternative would meet most of the basic project objectives. Subsection 2.4, *2030 CAP Objectives*, in Section 2, *Project Description*, identifies four project objectives. Any alternative determined not to meet at least two of the four objectives was not carried forward for more detailed review.
2. Whether the alternative would be potentially feasible, where 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 (Public Resources Code Section 21061.1; CEQA Guidelines Sections 15126.6 and 15364).[1] Any alternative determined to be infeasible was not carried forward for more detailed review.
3. Whether implementation of the alternative is remote or speculative. For purposes of this analysis, remote means unlikely or having only a slight chance of occurring, and speculative means unsupported, theoretical, or based on conjecture or guesswork. Any potential alternative determined to be remote or speculative was not carried forward for more detailed review.

In addition to these screening criteria, the County considered input received during the scoping period for the EIR as part of the alternatives' development process. Written and oral comments from agencies and the public were received during the scoping period. Table 1-1 in the *Program EIR Background* discussion of Section 1, *Introduction*, summarizes all comments received during the scoping period; none of the comments were related to potential alternatives.

6.2 Alternatives Rejected from Detailed Consideration

CEQA Guidelines Section 15126.6(a) 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." Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the Program EIR. Alternatives that do not meet basic project objectives, are infeasible, or are remote or speculative, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (CEQA Guidelines, Section 15126.6[f][1]).

The following alternatives were considered, but eliminated from further analysis by the County, due to one or more of the factors described in Section 6.1, *Alternatives Development and Screening*.

6.2.1 No Growth Policy

A No Growth Policy Alternative would involve the County reducing GHG emissions by enacting a moratorium on new development, thereby avoiding additional carbon emissions that would occur from new development. A No Growth Policy Alternative would not meet most of the basic objectives, including quantifying GHG emissions in the County or providing the County with a

[1] A sufficient demonstration of financial infeasibility requires more than a showing that the alternative would be more expensive or less profitable; it requires evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project. *Citizens of Goleta Valley* (1998) 197 Cal. App. 3d. 1167, 1181.

Qualified Greenhouse Gas Emissions Reduction Plan to streamline the environmental review of future development projects. The County cannot reasonably or feasibly restrict growth across all sectors of development, including residential, commercial, and industrial. A No Growth Policy Alternative would result in negative economic effects as new employment opportunities from new development would halt, opportunities for new residents to live in the County would be limited and contributions to the local economy would cease. Therefore, this alternative is rejected because it would not meet most of the basic project objectives and is not feasible.

6.2.2 Transportation Infrastructure Improvements

A Transportation Infrastructure Improvements Alternative would reduce GHG emissions from the transportation sector by advancing aggressive policies to enhance bicycle and pedestrian travel, upgrade public transit, construct electric vehicle charging stations, resulting in multimodal transportation improvements that would reduce vehicle miles traveled (VMT) and associated GHG emissions beyond what would occur in accordance with implementation of the 2030 CAP. The transportation sector is the leading contributor to GHG emissions in Santa Barbara County. As described in the 2030 CAP, on-road transportation accounted for 49 percent of 2018 GHG emissions. The 2030 CAP includes Actions designed to achieve GHG reductions by increasing electric vehicle use, ownership, and infrastructure; increase public transit and bike use; and reduce carbon emissions from off-road equipment.

Achieving a substantial reduction in GHG emissions from transportation infrastructure improvements would require implementation of aggressive policies and a shift in decision-making regarding mode and frequency of travel by households and businesses in the County. Substantially improved transit and alternative transportation infrastructure, widespread access to alternative modes of transportation, financial incentives to use alternative modes of transportation, or disincentives to use of motor vehicles, all could be part of the solution towards achieving substantial GHG reductions in the transportation sector. However, there is currently no evidence to assume this alternative could feasibly be accomplished within the timeframe to achieve the State's GHG emissions reduction target of 40 percent below 1990 emissions levels by 2030. Furthermore, transportation infrastructure improvements required to substantially reduce GHG emissions in the County would be costly, likely requiring the County to abandon pursuit of other community priorities. Therefore, the Transportation Infrastructure Improvements Alternative is rejected because it is speculative and would not be feasible.

6.2.3 Expedited Timeline to Carbon Neutrality Implementation

The County has adopted a goal to achieve carbon neutrality by 2045. The Expedited Timeline to Carbon Neutrality Implementation Alternative would involve accelerating the County's projected GHG emissions reductions programs in order to achieve carbon neutrality by 2035.

While emerging technologies that would further reduce GHG emissions are expected to become more commercially available over the course of the timeframe of the County's GHG emissions reduction goals, sufficient technological advancements to meet the County's GHG emissions reduction goals by 2035 are not currently available. Therefore, it is speculative to assume such technologies would become available in the time needed for the County to achieve carbon neutrality by 2035. Furthermore, the County would likely need to ensure the following actions in order to achieve carbon neutrality by 2035:

- Electrify 100 percent of buildings and facilities in the County, including residential, commercial, industrial, and energy industries.
- Achieve zero (or near-zero) waste landfilling.
- Have more than 95 percent of the Countywide vehicle fleet, including light-duty passenger vehicles and heavy-duty trucks, be zero-emission vehicles.
- Eliminate all oil and natural gas operations in the County.
- Transition all refrigerants, fire suppressants, and consumer products used within the County to substitutes with extremely low (or zero) global warming potential.
- Replace all off-road equipment and off-road vehicles (including locomotives) with electric, green hydrogen, or other zero-emission engine technologies.
- Capture nearly all fugitive wastewater treatment process emissions and converting to fuel.
- Eliminate nitrous oxide emissions from fertilizer application.
- Implement carbon removal and/or carbon capture and sequestration strategies to offset all remaining residual emissions.

There is no basis to assume achieving carbon neutrality by 2035 would be accomplished in a successful manner, taking into account economic, environmental, legal, social, and technological factors. Therefore, this alternative is rejected because it is speculative and would not be feasible.

6.3 Alternatives Evaluated in Detail in this EIR

This EIR analyses three alternatives, including the CEQA-required "no project" alternative, which involve changes to the 2030 CAP that serve as alternative methods for reducing GHG emissions in the County. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the 2030 CAP. Descriptions of the alternatives are provided in Sections 6.3.1 through 6.3.3. The potential environmental impacts of each alternative are discussed in Sections 6.4.1 through 6.4.3.

6.3.1 Alternative 1: No Project Alternative

CEQA Guidelines Section 15126.6(e) requires an EIR to evaluate the impacts of a no project alternative to enable a comparison of the potential environmental consequences that would result with and without a proposed project. In this case, the No Project Alternative examines a scenario in which the County would not approve the 2030 CAP. Under such a scenario, none of the emissions reductions Measures or Actions outlined in the 2030 CAP would be implemented, and none of the benefits of the 2030 CAP would be realized. The County would continue to rely on implementation of GHG emissions reductions strategies within the 2015 Energy and Climate Action Plan, which would not achieve the State's goal of a 40 percent reduction in emissions from 1990 levels by 2030.

The anticipated GHG emissions that would occur in accordance with the No Project Alternative are generally described in the 2030 CAP's State-Adjusted forecast, which accounts for future growth in accordance with business-as-usual conditions, adjusting for implementation of existing State laws

and programs that were implemented prior to the development of the 2030 CAP[2]. This alternative would not provide a clear pathway for the County to meet the State's emissions reduction goal.

6.3.2 Alternative 2: Carbon Credit Alternative

Under the Carbon Credit Alternative, in lieu of adopting the 2030 CAP, the County would purchase carbon offsets to reduce GHG emissions. Carbon offset projects could increase or protect carbon sequestration, invest in solar or wind projects, improve water or energy efficiency, capture methane at animal farms or landfills, replace high-global warming-potential gas use with a gas that has a lower global warming potential, or implement other types of measures. To achieve the greatest environmental benefits to Santa Barbara County, priority would be given, from highest to lowest, to offsets purchased locally (within the County), regionally (within the Central Coast of California), within California, outside of California but within the Pacific Southwest (within Arizona, Hawaii, Utah, or Nevada), and elsewhere in the United States.

6.3.3 Alternative 3: Building Electrification Alternative

The 2030 CAP includes Action CE-1.1 and Action CE-1.2 which requires the County to restrict natural gas infrastructure for new development and major remodels and complete an existing building electrification plan to identify the policies and programs needed to achieve the 2030 CAP goal to electrify 14 percent of existing buildings by 2030, respectively. The Building Electrification Alternative would revise these Actions to require the County to adopt a building electrification ordinance concurrently with adoption of the 2030 CAP which requires 100 percent building electrification by 2030. This would result in the complete and immediate restriction of all natural gas infrastructure rather than a restriction for only new development and major remodels. The Building Electrification Alternative would result in the complete electrification of buildings in Santa Barbara County within the timeframe of the 2030 CAP, substantially reducing GHG emissions resulting from the use of natural gas.

6.4 Comparative Analysis of Alternatives

6.4.1 No Project – Alternative 1 Impact Analysis

a. Air Quality

Under the No Project Alternative the County would continue to implement GHG emissions reductions strategies contained in the 2015 Energy and Climate Action Plan, which include State Air Toxic Control Measures, Santa Barbara County Air Pollution Control District rules, and County Code regulations. This alternative would not implement 2030 CAP Measures and Actions that would encourage alternative transportation facilities, building electrification, electric vehicle charging facilities, or use of solar photovoltaic panels, or other development that would have the secondary effect of reducing criteria pollutant emissions. As a result, the No Project Alternative would result in higher regional criteria pollutant emissions than the 2030 CAP. However, continued implementation of current emissions reductions strategies would still minimize the potential for the No Project Alternative to result in an increase of criteria pollutants for which the South Central Coast Air Basin is in non-attainment, minimize the potential for sensitive receptors to be exposed to substantial pollutant concentrations, and minimize the potential for the No Project Alternative to result in

[2] The "business-as-usual" forecast assumes no action is taken to reduce GHG emissions in the County. 2018 emissions are projected forward using growth indicators such as population, housing, and employment.

substantial odors. Therefore, the No Project Alternative would result in greater air quality impacts than the 2030 CAP, but overall impacts to air quality would remain less than significant.

b. Energy

The No Project Alternative would result in the County continuing to implement GHG emissions reductions strategies within the 2015 Energy and Climate Action Plan, including strategies to minimize energy related GHG emissions, such as promoting renewable energy procurement and designing buildings to exceed Title 24 energy standards. Strategies in the 2015 Energy and Climate Action Plan were developed to reduce energy use throughout Santa Barbara County and promote State SB 100 requirements and Title 24 energy standards. However, this alternative would not implement 2030 CAP Measures and Actions that would encourage alternative transportation facilities, building electrification, electric vehicle charging facilities, or use of solar photovoltaic panels, or other development that would have the secondary effect of reducing wasteful, inefficient, or unnecessary consumption of energy resources. As a result, the No Project Alternative would not achieve a comparable reduction in energy use in comparison to the 2030 CAP. Construction resulting from implementation the No Project Alternative would continue to comply with applicable State regulations to minimize energy use. Overall, the No Project Alternative would result greater energy impacts than the 2030 CAP, but impacts to energy would remain less than significant.

c. Greenhouse Gas Emissions

Under the No Project Alternative the County would continue to implement GHG emissions reductions strategies in the 2015 Energy and Climate Action Plan, developed to reduce GHG emissions in Santa Barbara County by 15 percent below 2007 levels by 2020. Although the No Project Alternative would implement strategies to reduce GHG emissions, the anticipated GHG reductions would be less than the County's proportional fair share of the statewide emissions reduction target established by Senate Bill 32. Therefore, the No Project Alternative would result in greater GHG emissions in comparison to the 2030 CAP, and would not be consistent with State GHG emissions reductions targets, which would be a significant and unavoidable impact.

d. Transportation

The No Project Alternative would result in the County continuing to implement 2015 Energy and Climate Action Plan GHG emissions reductions strategies, which are consistent with SBCAG and County alternative transportation goals. As a result, the No Project Alternative would result in VMT reductions consistent with *CEQA Guidelines* Section 15064.3(b), although this alternative would not implement 2030 CAP Measures and Actions that would encourage alternative transportation facilities, electric vehicle charging facilities, or other development that would further reduce VMT for residential, commercial, and industrial sectors throughout the County. As a result, the No Project Alternative would result in higher VMT in comparison to the 2030 CAP. Development projects in Santa Barbara County would continue to be designed in accordance with applicable State regulations, County Code requirements, and applicable fire department standards intended to minimize transportation hazards and ensure adequate emergency access. Overall, the No Project Alternative would result in higher VMT than the 2030 CAP, but impacts to transportation would remain less than significant.

6.4.2 Carbon Credit – Alternative 2 Impact Analysis

a. Air Quality

The Carbon Credit Alternative would not implement the 2030 CAP's County-specific Measures or Actions designed to reduce GHG emissions, and would not encourage alternative transportation facilities, building electrification, electric vehicle charging facilities, use of solar photovoltaic panels, or other development that would have the secondary effect of reducing criteria pollutant emissions. As a result, the Carbon Credit Alternative would result in higher regional criteria pollutant emissions than the 2030 CAP. However, continued implementation of current emissions reductions strategies would still minimize the potential for the Carbon Credit Alternative to result in an increase of criteria pollutants for which the South Central Coast Air Basin is in non-attainment, minimize the potential for sensitive receptors to be exposed to substantial pollutant concentrations, and minimize the potential for the Carbon Credit Alternative to result in substantial odors. Therefore, the Carbon Credit Alternative would result in greater air quality impacts than the 2030 CAP, but overall impacts to air quality would remain less than significant.

b. Energy

The Carbon Credit Alternative would result in the County purchasing carbon credits in compliance with the California Air Resources Board (CARB) Cap-and-Trade Program requirements rather than implementing the 2030 CAP's County-specific Measures and Actions to reduce GHG emissions. The Carbon Credit Alternative would not encourage alternative transportation facilities, building electrification, electric vehicle charging facilities, or use of solar photovoltaic panels, or other development that would have the secondary effect of reducing wasteful, inefficient, or unnecessary consumption of energy resources. As a result, the Carbon Credit Alternative may result in increased impacts to energy in comparison to the 2030 CAP; however, because the Carbon Credit Alternative would not directly result in wasteful, inefficient, or unnecessary consumption of energy resources, the overall impact would remain less than significant.

c. Greenhouse Gas Emissions

The Carbon Credit Alternative would result in the County purchasing carbon offsets to reduce GHG emissions rather than implementing the 2030 CAP's County-specific Measures and Actions to reduce GHG emissions. Although priority would be given to carbon offsets purchased locally, regionally, and within California, the County would also have the opportunity to purchase carbon offsets which would be applied outside of California, thereby not contributing to achieving the State's GHG emissions reductions goals. The purchase of carbon offsets would not obligate the County to implement additional programs to reduce GHG emissions locally. In addition, there is substantial uncertainty associated with existing markets for carbon credit and offset, such that the amount of carbon offsets purchased may not result in an equivalent reduction in GHG emissions. Without substantial evidence of the efficacy of carbon offsets, it would remain speculative whether the Carbon Credit Alternative would result in GHG emissions reductions in compliance with Senate Bill 32 goals. Feasible mitigation is not available for this alternative to demonstrate compliance with Senate Bill 32 goals. Therefore, the Carbon Credit Alternative has the potential to result in greater GHG emissions in comparison to the 2030 CAP, and would not be consistent with State GHG emissions reductions targets, resulting in a significant and unavoidable impact.

d. Transportation

The Carbon Credit Alternative would result in the County purchasing carbon offsets to reduce GHG emissions rather than implementing the 2030 CAP's County-specific Measures and Actions to reduce GHG emissions. However, existing 2015 Energy and Climate Action Plan GHG emissions reductions strategies, which are consistent with SBCAG and County transportation goals, would continue to be implemented. As a result, the Carbon Credit Alternative would result in VMT reductions consistent with *CEQA Guidelines* Section 15064.3(b), although this alternative would not implement 2030 CAP Measures and Actions that would further reduce VMT for residential, commercial, and industrial sectors throughout the County. As a result, the Carbon Credit Alternative would result in higher VMT in comparison to the 2030 CAP. Development projects in Santa Barbara County would continue to be designed in accordance with applicable State regulations, County Code requirements, and applicable fire department standards intended to minimize transportation hazards and ensure adequate emergency access. Overall, the Carbon Credit Alternative would result higher VMT than the 2030 CAP, but impacts to transportation would remain less than significant.

6.4.3 Building Electrification – Alternative 3 Impact Analysis

a. Air Quality

The Building Electrification Alternative would necessitate more construction activities than the 2030 CAP in order to retrofit existing buildings to achieve 100 percent building electrification in Santa Barbara County. Construction activity associated with electrifying existing buildings would be required to comply with State Air Toxic Control Measures, Santa Barbara County Air Pollution Control District rules, and County Code regulations, which would minimize criteria air pollutant, TAC, and odor emissions. Once implemented, the Building Electrification Alternative would result in a greater reduction of long-term regional pollutant emissions associated with building operation than the 2030 CAP. Overall, the Building Electrification Alternative would result in reduced regional air quality impacts in comparison to the 2030 CAP.

b. Energy

The Building Electrification Alternative would necessitate more construction activities than the 2030 CAP in order to retrofit existing buildings to achieve 100 percent building electrification in Santa Barbara County. However, construction resulting from implementation of the Building Electrification Alternative would be required to comply with applicable State regulations to minimize energy use. Overall the Building Electrification Alternative would result in similar long-term energy consumption as the 2030 CAP, and would not directly result in wasteful, inefficient, or unnecessary consumption of energy resources. Similar to the 2030 CAP, the Building Electrification Alternative would result in less than significant impacts to energy.

c. Greenhouse Gas Emissions

The Building Electrification Alternative would result in greater reductions of GHG emissions associated with building energy by requiring 100 percent building electrification by 2030, rather than the 2030 CAP's goal of 14 percent building electrification by 2030, in addition to the other Measures and Actions already included in the 2030 CAP. These additional GHG emissions reductions would exceed the State's 2030 GHG emissions reduction goals and further contribute to the County and State's goal of achieving carbon neutrality by 2045. Therefore, the Building Electrification

Alternative would result in reduced GHG emissions in comparison to the 2030 CAP, and would be consistent with State GHG emission reduction targets, resulting in a less than significant impact.

d. Transportation

The Building Electrification Alternative would implement similar alternative transportation Measures and Actions to the 2030 CAP, resulting in similar VMT reductions consistent with *CEQA Guidelines* Section 15064.3(b). Development projects in Santa Barbara County would continue to be designed in accordance with applicable State regulations, County Code requirements, and applicable fire department standards intended to minimize transportation hazards and ensure adequate emergency access. Therefore, similar to the 2030 CAP, the Building Electrification Alternative would result in less than significant impacts to transportation.

6.5 Environmentally Superior Alternative

The *CEQA Guidelines* define the environmentally superior alternative as the alternative with the least adverse impacts on the project site and its surrounding environment. Table 6-1 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the 2030 CAP for each of the issue areas studied. For this project, the Building Electrification Alternative is considered the environmentally superior alternative.

Table 6-1 Impact Comparison of Alternatives

Issue	2030 CAP Impact Classification	Alternative 1: No Project	Alternative 2: Carbon Credit	Alternative 3: Building Electrification
Air Quality	Less than significant	Less than significant	Less than significant	Less than significant
Energy	Less than significant	Less than significant	Less than significant	Less than significant
Greenhouse Gas Emissions	Less than significant	Significant and Unavoidable	Significant and Unavoidable -	Less than significant
Transportation	Less than significant	Less than significant	Less than significant	Less than significant

The Building Electrification Alternative would result in less than significant impacts to air quality, energy, greenhouse gas emissions, and transportation, similar to the 2030 CAP. In comparison, the No Project Alternative and the Carbon Credit Alternative would each result in significant and unavoidable impacts to greenhouse gas emissions. The Building Electrification Alternative would result in greater GHG emissions reductions than the 2030 CAP and would meet all project objectives. However, the Building Electrification Alternative may require the County to utilize substantial resources in excess of the 2030 CAP to electrify 100 percent of the buildings in Santa Barbara County which could delay implementation of other Measures and Actions designed to reduce GHG emissions.

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7.2 List of Preparers

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