

4 Environmental Impact Analysis

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

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 but may be considered in determining whether the physical change is significant.

Approach to Environmental Impact Analysis

The assessment of each issue area begins with a description of the environmental setting related to the issue, followed by the impact analysis. The impact analysis identifies the methodologies used and the significance thresholds, which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The impact analysis also describes each impact of the proposed project, 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 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 recommended if readily available and easily achievable.
- **No Impact or Beneficial.** The proposed project 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 measures. 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. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed below under *Approach for Cumulative Analysis*.

Baseline and Cumulative Project Setting

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 Environmental Impact Report (Program EIR) evaluates impacts against existing conditions, which are generally conditions existing at the time of the release of the NOP (March 2022). The existing baseline also reflects the adoption of the 6th Cycle Housing Element by Santa Barbara City Council on December 12, 2023, and certification by the State Department of Housing and Community Development on February 13, 2024. It was determined that a comparison to current, existing baseline conditions would provide the most relevant information for the public, responsible agencies, and City decision-makers. For some issue areas, this Program EIR also includes consideration of impacts against a forecast future baseline condition in addition to the current baseline conditions, controlling for impacts caused by population growth and other factors that would occur. For certain issue areas (including air quality, greenhouse gas emissions/climate change, energy, noise and transportation/circulation), impacts would occur as a result of population growth, urbanization, and volume of average daily traffic increases in the region that would occur by 2035, with or without implementation of the Housing Plan. Thus, for these issue areas, a comparison to a future 2035 baseline is provided for informational purposes. However, all impact determinations are based on a comparison to existing baseline conditions.

Approach for Direct Impact Analysis

The programmatic nature of the Housing Plan necessitates a general approach to the evaluation of existing conditions and impacts associated with implementation. As a programmatic document, this Program EIR presents a regionwide assessment of the impacts of implementation of the Housing Plan. Because the Program EIR is a long-term document intended to guide actions in the future, this analysis relies on program-level and qualitative evaluation. Quantitative analyses are provided where applicable with available information. During future stages in planning and implementation of specific programs within the Housing Plan, project-specific CEQA documents will be prepared if necessary by the appropriate project implementation agency.

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

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 proposed project alone, or together with other projects. The CEQA Guidelines, Section 15355 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.

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 this Program EIR.

The Housing Element is a component of the City's General Plan that addresses cumulative conditions by design. The planning area for Santa Barbara includes all areas within the city boundaries (approximately 12,636 acres), as well as approximately 6,137 acres beyond the city limits. The Housing Plan implements the community's vision for the city of Santa Barbara through the eight-year Housing Element planning period. As such, the environmental analysis of the Housing Plan presented throughout this Program EIR is a cumulative analysis consistent with CEQA policies. Furthermore, this Program EIR contains detailed analysis of regional (cumulative) impacts, which are differentiated from localized impacts that may occur at the city level.

When evaluating cumulative impacts, CEQA allows the use of either a list of past, present, and probable future projects, including projects outside the control of the lead agency; a summary of projections in an adopted planning document; or a combination of the two approaches. The cumulative analysis included in each of the environmental issue areas addressed in Section 4 of this Program EIR uses a projections-based approach (see CEQA Guidelines, Section 15130B[1]) to address cumulative effects from growth extending beyond the planning area. Residential land use and growth projections for the City, which are the subject of analysis throughout this Program EIR, are considered in combination with similar impacts of reasonably anticipated regional programs including the City's Safety Element Update, Open Space Element Update, the City's State Street Master Plan, and the California Department of Transportation's (Caltrans') South Coast Highway 101 High-Occupancy Vehicle Lanes project.

Further, the cumulative project list for this Program EIR includes related past, present, and reasonably foreseeable residential development projects which would contribute towards the City's ability to meet its RHNA, including development proposed on sites within the Suitable Sites Inventory. Site-specific analysis of these cumulative projects is not considered in this Program EIR. A list of residential development projects with over 10 new residential units with either pending or recently approved applications as of December 2025 is provided Table 4-1. This list is not exhaustive; the projected number of housing units is approximate and subject to changes.

Table 4-1 Cumulative Residential Development Projects

#	Project Name and Location	Approximate # of Units	Status as of December 2025
1	3805 State St	680	Pending Application
2	3843 State St	443	Pending Application
3	Paseo Nuevo Development Agreement	500	Approved Development Agreement, No Application
4	335 S Milpas St	53	Pending Application
5	915 E Montecito St	30	Pending Application
6	3055 De La Vina St	33	Approved, Building Permit Issued/ Under Construction
7	428 Chapala St	27	Pending Application
8	932 De La Vina St	22	Pending Application

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#	Project Name and Location	Approximate # of Units	Status as of December 2025
9	222 E Canon Perdido St	24	Pending Application
10	1922 De La Vina St	39	Pending Application
11	1529 State St	27	Pending Application
12	102 W De la Guerra St	44	Pending Application
13	418 N Milpas St	90	Approved, Not Yet Constructed
14	304 Rancheria St	24	Approved, Not Yet Constructed
15	1 Hot Springs Rd*	22	Pending Application
16	1609 Grand Ave*	54	Pending Application
17	505 E Los Olivos St*	270	Pending Application
18	425 Santa Barbara St	19	Approved, Not Yet Constructed
19	425 Garden St	36	Approved, Building Permit Issued/ Under Construction
20	400 W Carrillo St	63	Approved, Not Yet Constructed
21	200 N La Cumbre Rd	48	Approved, Not Yet Constructed
22	15 S Hope Ave	46	Approved, Not Yet Constructed
23	219 E Haley St	34	Approved, Building Permit Issued/ Under Construction
24	409 E Haley St	26	Pending Application
25	1317 Punta Gorda St	14	Approved, Building Permit Issued/ Under Construction
26	115 W Anapamu St	42	Approved, Building Permit Issued/ Under Construction
27	630 Chapala St	39	Approved, Not Yet Constructed
28	711 N Milpas St	82	Approved, Not Yet Constructed
29	220 N La Cumbre Rd	48	Approved, Building Permit Issued/ Under Construction
30	515 W Los Olivos St*	25	Approved, Not Yet Constructed
31	320 W Carrillo St	34	Approved, Not Yet Constructed
32	12 E Carrillo St	14	Approved, Not Yet Constructed
33	1529 State St	27	Approved, Not Yet Constructed
34	185 E Ortega St	24	Pending Application
35	517 Chapala St	15	Pending Application
36	308 W Montecito St	12	Pending Application
37	328 W Montecito St	12	Pending Application
38	518 N Milpas St	23	Pending Application
39	17 W Canon Perdido St	112	Pending Application

Source: City of Santa Barbara Planning Division. <https://experience.arcgis.com/experience/556c0f63074a4c51950c6f9155d58e45>

* Indicates Builder's Remedy projects.