4.11 Effects Found Not to be Significant

This section summarizes the analysis of issue areas for which no significant adverse impacts were identified and, therefore, are not discussed in detail in the Program Environmental Impact Report (Program EIR). Each of the potential environmental effects listed below are contained in the City's environmental checklist and the environmental checklist form included in Appendix G of the CEQA Guidelines. In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) for this Program EIR was distributed for review by affected agencies and the public from April 11, 2022, to May 11, 2022. The NOP and responses received during the NOP comment period are presented in Appendix A and summarized in Section 1, *Introduction*. Based on the comments received during the NOP comment period, the City of Santa Barbara has determined that there is no substantial evidence that the project would cause or otherwise result in significant environmental effects for the resource areas described below.

All other potential environmental effects described in the City's environmental checklist and the environmental checklist form included in Appendix G of the CEQA Guidelines, but not addressed in this section, have been addressed in Sections 4.1 through 4.10 of this Program EIR. These sections include an expanded discussion of the settings under each environmental issue area discussed therein.

4.11.1 Agriculture and Forestry Resources

Potential Environmental Effects

- Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
- Would the project result in the loss of forest land or conversion of forest land to non-forest land?
- Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest land?

Reasons Why Effects Were Not Found Significant

Agricultural Resources and Williamson Act Contracts

The City of Santa Barbara is highly urbanized with existing development. According to the California Department of Conservation's (DOC) *California Important Farmland Finder*, the entirety of the city is designated as Urban and Built-Up Land (DOC 2018). Urban and Built-Up Land is defined as land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a ten-acre parcel (DOC 2018). Therefore, development forecasted in accordance with

the Housing Plan would not have the potential to result in conflicts with existing zoning for agricultural uses or have the potential to directly or indirectly convert farmland to nonagricultural uses.

As shown in Figure 2-4 and Figure 2-5 of Section 2, *Environmental Setting*, there are no agricultural land use designations in the City of Santa Barbara. No land within the City of Santa Barbara is under a Williamson Act contract (Santa Barbara County Conservation Blueprint Atlas 2015). Therefore, there would be no conflict with existing zoning for agricultural use or a Williamson Act contract.

Forestry Resources

There is no land in the City of Santa Barbara zoned for or containing formally classified forest land or timberland. Development forecasted in accordance with the Housing Plan would not conflict with existing zoning, or cause rezoning of, forest land or land zoned for timberland production; and would not result in the loss of forest land or conversion of forest land to non-forest land.

4.11.2 Energy

Potential Environmental Effects

- 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?
- Would the project conflict with a state or local plan for renewable energy or energy efficiency?

Reasons Why Effects Were Not Found Significant

Consumption of Energy Resources

The Housing Plan would prioritize the development of new housing within urbanized and previously developed areas. Development forecasted in accordance with the Housing Plan would consume energy during construction activities and project operation through the use of petroleum fuel, natural gas, and electricity, as further addressed below.

CONSTRUCTION

Energy use during construction activities associated with new housing development would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. In addition, construction contractors would be required to demonstrate compliance with applicable California Air Resource Board (CARB) and Santa Barbara County Air Pollution Control District (APCD) 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 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 development forecasted in accordance with the Housing Plan. Furthermore, 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. Future construction activities associated with development forecasted under the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy.

OPERATION

Long-term operation of new housing developed in accordance with the Housing Plan would result in minor amounts of natural gas consumption. City of Santa Barbara 2024 Climate Action Plan discourages the installation of natural gas infrastructure in newly constructed buildings, (City of Santa Barbara 2024). Future development facilitated by the Housing Plan would generally require permanent grid connections for electricity service to power internal and exterior building lighting, heating, and cooling systems. Assembly Bill 117, passed in 2002, requires all electrical corporations to cooperate fully with community choice aggregators that investigate, pursue, or implement community choice aggregator programs. The investor-owned utility maintains the responsibility of providing transmission and distribution services, and metering, billing collection, and customer service, however procurement of electric power is the responsibility of the community choice aggregator (California Public Utilities Commission 2022a). Southern California Edison (SCE) delivers electricity to Santa Barbara, procured by Santa Barbara Clean Energy. At a minimum, energy procured through Santa Barbara Clean Energy provides 50 percent carbon-free energy, and buildings are automatically opted-in to the Santa Barbara Clean Energy system (Santa Barbara Clean Energy 2022). As such, development facilitated by the Housing Plan would utilize a minimum of 50 percent carbon-free energy, which is more carbon-free energy than what is currently collectively served by California investor-owned utilities (36 percent) and assists in reaching the Renewable Portfolio Standards goal of 60 percent renewable energy retail sales by 2030 (California Public Utilities Commission 2021).

New development facilitated by the Housing Plan would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code (CEC) provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. The CEC applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. It also provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The CEC emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. Pursuant to Santa Barbara Municipal Code and Climate Action Plan, if a project would result in an increase in fossil fuel consumption, specific-project design measures may be required (City of Santa Barbara 2024).

Residential development facilitated by the project would prioritize mixed-use and infill development in close proximity to existing transit, commercial/retail, recreational, and institutional land uses, reducing trip distances, encouraging use of alternative modes of transportation, and reducing fuel consumption. Residential development would be subject to the regulations described above which would further minimize unnecessary energy resource consumption. Therefore, the Housing Plan would not result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Conflicts with State or Local Plans

As discussed under *Consumption of Energy Resources*, residential development forecasted in accordance with the Housing Plan would be subject to energy efficiency related regulations, including the CEC and California Green Building Standards Code, along with relevant City standards for green building construction.

Encouraging residential development in proximity to existing transit and job centers, along with adherence to existing regulations, would ensure that the reasonably foreseeable development forecasted in accordance with the Housing Plan would not conflict with renewable energy and energy efficiency plans adopted by the City, including the 2024 Climate Action Plan. Growth anticipated by the Housing Plan is consistent with the greenhouse gas emissions quantifications in the Climate Action Plan. All new residential development would have access to renewable energy procured by Santa Barbara Clean Energy which would further the City's carbon neutrality goal. As a result, the Housing Plan would not conflict with or obstruct a plan for renewable energy or energy efficiency.

4.11.3 Geology and Soils

Potential Environmental Effects

- Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic conditions:
  - Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - Tsunami?
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, collapse, or sea cliff failure? Be located on expansive soils, as defined by the Uniform Building Code, creating a substantial direct or indirect risk to life or property?
- Result in substantial soil erosion or the loss of topsoil?
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Reasons Why Effects Were Not Found Significant

Earthquake Fault Rupture

The City of Santa Barbara, as with the majority of the state of California, is susceptible to seismic activity. Established in the Alquist-Priolo Earthquake Fault Zoning Act, Alquist-Priolo earthquake fault zones are regulatory zones compiled by the California Geological Survey which designate the surface traces of active faults in California (DOC 2019a). For the purposes of the Alquist-Priolo Earthquake Fault Zoning Act, an active fault is defined as a fault that has ruptured in the past 11,000 years (DOC 2019a). There are no Alquist-Priolo earthquake fault zones that partially or fully intersect the City (DOC 2021). The nearest Alquist-Priolo earthquake fault zone is the Red Mountain Fault – South Strand, located approximately 12.6 miles southeast of the City (DOC 2021). As such, development setback regulations pertaining to the Alquist-Priolo Earthquake Fault Zoning Act do not apply. However, several documented faults do exist within the City that could indicate near-surface faulting and surface warps; these faults have not been thoroughly evaluated for fault activity. For development projects on or near fault zones on the City geologic map, geological and geotechnical evaluations may be required during the permitting process, pursuant to the adopted Master Environmental Assessment Guidelines for Geology and Geohazards (City of Santa Barbara 2009). Incorporation of project-specific measures such as fault hazard avoidance, setbacks, and structural engineering solutions to accommodate acceptable levels of discrete movement and surface warping, would not result in significant environmental impacts.

Development facilitated by the Housing Plan would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas that could create unstable seismic conditions or stresses in the Earth's crust. As such, the Housing Plan would not exacerbate fault rupture susceptibility, or directly or indirectly cause or increase potential substantial adverse effects involving the rupture of a known earthquake fault.

Seismic Groundshaking

Earthquake faults near the city could produce strong seismic ground shaking in the event of an earthquake. This is a common risk throughout California, and the Housing Plan would not exacerbate seismic groundshaking conditions or increase risks to public safety or property beyond what is already present for the region. Residential development facilitated by the Housing Plan would be required to adhere to the standards of the California Building Code (CBC), which provides earthquake design requirements, including earthquake loading specifications for design and construction to resist effects of earthquake motions in accordance with the American Society of Civil Engineers Standard 7-05. In addition, CBC standards regulate procedures for soil preparation, including, but not limited to excavation, grading and earthwork, fills and embankments, expansive soils, foundation investigations, liquefaction potential, and soil strength loss. Through individual project compliance with applicable CBC regulations, development forecasted in accordance with the Housing Plan would not result in substantial adverse effects associated with seismic groundshaking.

Liquefaction

Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. High liquefaction potential exists at the Santa Barbara Airport and at

the southeastern portion of the city abutting a stretch of coast from Leadbetter Beach to East Beach and extending northwest into the downtown area (City of Santa Barbara 2010). Proposed development located in areas of high liquefaction potential identified in the City may require a geotechnical report during the permitting process (City of Santa Barbara 2022a), pursuant to the adopted Master Environmental Assessment Guidelines for Geology and Geohazards (City of Santa Barbara 2009). Geotechnical reports identify liquefaction potential and provide recommendations to minimize the potential for impacts associated with liquefaction to occur. Municipal Code, Chapter 22.04, lists the adoptions of California Codes by reference, which includes CBC and subsequent measures such as requiring site-specific geotechnical investigations and incorporating site specific recommendations regarding site suitability and foundation design. Compliance with the Municipal Code and CBC requirements would ensure current engineering practices and standards are followed, reducing impacts related to adverse effects from liquefaction risk. Therefore, development forecasted in accordance with the Housing Plan would not cause substantial adverse effects involving liquefaction.

Tsunami

Tsunamis are large ocean waves that are generated by earthquakes or volcanic eruptions under the sea. The city's coastline from Leadbetter Beach extending to the Andree Clark Bird Refuge and extending inland to Haley Street is designated as a Tsunami Hazard Area (DOC 2019b). As a result, development forecasted in accordance with the Housing Plan may expose future residents to tsunami related hazards. The City adopted the current Tsunami Response Plan in 2012, which provides information and guidance specific to receiving information that a tsunami watch, advisory or warning is in effect. The City receives tsunami warning from the National Oceanic and Atmospheric Administration (NOAA) West Coast/Alaska Tsunami Warning Center. The City's Office of Emergency Services has procedures and response actions from involved agencies and jurisdictions to respond to a tsunami advisory or warning, as set forth in their Emergency Management Plan (McGlinchey 2013). These regulatory safeguards would minimize exposure of the public and environment to a tsunami related hazard.

Development facilitated by the Housing Plan would not include specific projects that would exacerbate the potential for unstable seismic conditions that trigger causes of tsunamis. Further, new and substantial development within the City's Tsunami Hazard Area would be required to adopt standard permit conditions that address tsunami and seiche risks, pursuant to the requirements of the Coastal Land Use Plan (City of Santa Barbara, 2019). As such, implementation of the Housing Plan would not directly or directly cause or increase potential substantial adverse effects involving a tsunami. This impact would be less than significant.

Geologic or Soil Instability

The city is located on a coastal plain and the lower foothills of the Santa Ynez Mountain range. The topography of the city varies, and includes moderate to steep hillsides within the Riviera, rolling hills above Foothill Road, the uplifted marine terrace and steep coastal bluff faces of the Mesa, and the moderate to steep slopes of the Las Positas Valley (City of Santa Barbara 2010).

Future development facilitated by the Housing Plan could occur within areas with slope instability or unstable soils. However, City permitting procedures require geotechnical studies to address slope instability hazards. Incorporation of project-specific measures such as hazard avoidance, siting and setbacks, erosion control, and engineering solutions would generally minimize or avoid impacts. Development projects would be required to comply with the CBC's minimum standards for

structural design and site development. This includes standards for excavation, grading, fills, embankments, expansive soils, foundation investigations, liquefaction potentials, and soil strength. Incorporation of required CBC soil treatment programs (replacement, grouting, compaction, drainage control, etc.) in excavation and construction plans would ensure site-specific soil conditions achieve accepted safety standards relative to soil stability. As such, future development forecasted in accordance with the Housing Plan would be subject to existing regulations and procedures that would minimize potential impacts related to landslide, lateral spreading, subsidence, or collapse, or result in adverse effects to expansive soils.

Development forecasted in accordance with the Housing Plan along a coastal bluff or sea cliff would be required to adhere to the development standards for coastal bluffs, as set forth in Chapter 5.1 of the Coastal LUP (City of Santa Barbara 2019) and pursuant to the requirements of a Coastal Development Permit. While the General Plan Program EIR (2011) notes that rising sea levels could result in bluff retreat and the loss of existing and future property in the 2050 Extended Range forecast, the Coastal LUP development standards for development on the coastal bluffs are based on updated sea level rise projections and the California Coastal Commission's *Sea Level Rise Policy Guidance* (City of Santa Barbara 2019).

Proposed development located in areas with moderate or high slope stability hazards may require a geotechnical report during the permitting process (City of Santa Barbara 2022a). Coastal LUP Policy 4.3-10 requires development to revegetate cut and fill slopes at the completion of grading which would assist in stabilizing cut and fill soils for project-specific development. The City's General Plan Safety Element includes policies which require new development to incorporate design features that lessen slope failure risk, avoid grading on slopes greater than 30 percent grade, and incorporate long-term measures to address soil erosion (City of Santa Barbara 2011). Adherence to existing City requirements would ensure that implementation of the Housing Plan would not exacerbate risk of soil instability on hillsides or sea cliff failure. Overall, the Housing Plan would not create substantial direct or indirect risk to life or property by being on a geologic unit or soil that is unstable, or expansive. This impact would be less than significant.

Erosion

Soil erosion or the loss of topsoil occurs when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils, resulting in their transport offsite. The Housing Plan would encourage residential infill development in previously disturbed areas of the city. Ground disturbing activities associated with development facilitated by the Housing Plan would have the potential to result in the removal and erosion of topsoil during grading and excavation. Construction activities that disturb one or more acres of land are subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which requires the development of a Storm Water Pollution Prevention Plan (SWPPP) developed by a certified Qualified SWPPP Developer. The SWPPP includes project-specific Best Management Practices (BMPs) to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants from construction into storm water. Typical BMPs include, but are not limited to, installation of silt fences, erosion control blankets, and anti-tracking pads at site exits to prevent off-site transport of soil materials.

Additionally, per City of Santa Barbara Municipal Code 22.87.020, new development and redevelopment are required to comply with the Storm Water Runoff Requirements applicable to the proposed activity as provided by the City's Storm Water BMP Guidance Manual (City of Santa Barbara 2021b, City of Santa Barbara 2020a). Construction activities would also be required to

comply with California Building Code Chapter 70 standards, which are designed to ensure implementation of appropriate measures during grading and construction to control erosion and storm water pollution.

Erosion from project-specific activities forecasted in accordance with the Housing Plan would be controlled through implementation of required BMPs contained in existing regulations. Furthermore, BMPs for post-construction erosion and sediment control would remain in effect, which would improve future erosion conditions. Compliance with the existing regulations and regulatory compliance would reduce the risk of soil erosion from construction activities such that there would be minimal change in risk compared to current conditions with existing development. Therefore, the project would not result in substantial soil erosion or the loss of topsoil.

Septic Systems

The Housing Plan would emphasize residential development in urban infill sites which are generally served by existing infrastructure. Some hillside residential areas in the Campanil and Riviera neighborhoods are on septic systems; however development forecasted in accordance with the Housing Plan would facilitate the development of residences in areas that do not include the use of septic systems or alternative wastewater systems, as Housing Element policies and programs aim to concentrate residential development in the downtown core and multi-unit zoning districts, which do not include the hillside residential areas. Individual use and design of any alternative wastewater systems in the City would undergo site-specific design review (including potential geotechnical investigations) required by the City's Community Development Department to ensure adequate soil suitability. Therefore, the project would not result in new development on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

4.11.4 Hydrology and Water Quality

Potential Environmental Effects

- Surface Water — Would the project:
  - Substantially alter the existing drainage pattern of the site or area or substantially increase the rate or amount of surface runoff in a manner which would result in substantial erosion, siltation, or flooding on-or offsite?
  - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
  - Substantially affect water quality within a creek?
  - Conflict with or obstruct implementation of a water quality control plan?
- Groundwater – Would the project:
  - Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
  - Violate any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality?
- Flood Risk — Would the project:
  - Substantially exacerbate existing hazard conditions to persons or property?

- Risk release of pollutants due to project inundation?
- Conflict with floodway or floodplain regulations?

Reasons Why Effects Were Not Found Significant

Surface Water

Development forecasted in accordance with the Housing Plan would involve construction that could adversely impact surface water due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids. The city is within the jurisdiction of the Central Coast Regional Water Quality Control Board (RWQCB), which is responsible for the preparation and implementation of the water quality control plan for the Santa Barbara region. As discussed in Section 4.11.3, *Geology and Soils*, the federal Clean Water Act requires compliance with the NPDES Construction General Permit for projects disturbing more than one acre during construction. Compliance with the NPDES Construction General Permit is contingent on the preparation and implementation of a SWPPP, which includes project-specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants from construction into storm water. Typical BMPs include covering stockpiled soils, installation of silt fences and erosion control blankets, and proper handling and disposal of wastes. All development in the city is required to be planned, sited, and designed to protect water quality in compliance under California's Phase II Small Municipal Separate Storm Sewer System (MS4) Storm Water Permit (City of Santa Barbara 2019). In addition, pursuant to the City of Santa Barbara Municipal Code Section 22.87.020, all development is required to comply with Storm Water Runoff Requirements applicable to the proposed activity as provided by the City's Storm Water BMP Guidance Manual (City of Santa Barbara 2021b, City of Santa Barbara 2020a). Development forecasted in accordance with the Housing Plan would also be required to develop an Erosion and Sedimentation Control Plan prior to the issuance of building or grading permits, pursuant to Section 22.85.020 of the City of Santa Barbara Municipal Code (City of Santa Barbara 2021b). Compliance with the NPDES Construction General Permit, SWPPP, and City regulations would ensure BMPs are implemented during new construction to minimize potential impacts to surface water, consistent with the Central Coast RWQCB's water quality control plan.

Although implementation of the Housing Plan would promote increases in residential development in the city, it would prioritize development on infill sites, the majority of which consist of largely impervious surfaces and/or developed with structures. Any new development would be required to comply with the City's stormwater management regulations and Municipal Code requirements and as a result, development forecasted in accordance with the Housing Plan would not be anticipated to substantially alter existing drainage patterns or contribute substantial runoff water, or to result in substantial additional sources of polluted runoff. Pollutants associated with residential development include household garbage and household products, such as fertilizers and cleaning products. Residential properties are required to subscribe to a waste collection service which would limit potential runoff that would occur from leaking garbage and discarded household hazardous materials. Chapter 30.180 states liquids and solids of any kind shall not be discharged, either directly or indirectly, into a public or private body of water, sewage system, water course, or into the ground unless in compliance with applicable regulations of the Central Coast RWQCB. As such, discharge of pollutants from residential properties would be limited with adherence to City standards regarding pollutant control, and the Housing Plan would not provide substantial additional sources of polluted surface runoff that would substantially impact surface water quality (e.g., within a creek).

Therefore, implementation of the Housing Plan would not substantially alter the existing drainage patterns of a site or area, substantially increase surface runoff, create runoff water that would exceed the capacity of storm water drainage systems, affect water quality within a creek, or conflict with or obstruct implementation of a water quality control plan. This impact would be less than significant.

Groundwater

The City uses groundwater extracted from the Foothill Basin and the Santa Barbara Basin as one supply source of a diverse water supply portfolio, managed under the City's Enhanced Urban Water Management Plan (EUWMP) (City of Santa Barbara 2021e). The EUWMP projects anticipated water supply and demand for the City's water service area. As discussed in Section 4.10, *Utilities and Service Systems*, increased water demand in accordance with the Housing Plan would be adequately served by the City's existing water supply portfolio. The City's average planned groundwater pumping is 950 acre-feet per year (AFY) which is 350 AFY less than the average perennial yield of 1,250 AFY of groundwater available to the City (City of Santa Barbara 2021e). Because the water demand from the Housing Plan would not result in a water supply deficit which could result in an excess in groundwater pumped to meet demands, the Housing Plan would result in a less than significant decrease in groundwater supply.

Although implementation of the Housing Plan would facilitate an increase in residential development in the City, as discussed in Chapter 3, *Project Description,* the Housing Plan would prioritize development at sites which are already developed and/or surrounded by existing development in accordance with the Housing Plan's Suitable Sites Inventory. As a result, the Housing Plan would not be anticipated to result in a substantial amount of new impervious surfaces. Potential adverse effects associated with new impervious surfaces would be minimized through compliance with the City's Storm Water BMP Guidance Manual, which requires new development and redevelopment to implement BMPs to allow storm water to infiltrate into pervious areas and recharge the underlying groundwater basin rather than lead to the City's storm drain system (City of Santa Barbara 2020a). The City's Storm Water BMP Guidance Manual has different requirements for new development and redevelopment based on the area of new or replaced impervious surfaces for a specific project. For projects that would include 500 square feet or more of new or replaced impervious surfaces, the project-specific storm water treatment would be required to be sized according to the volumetric storm water management specifications within the Storm Water BMP Guidance Manual and be designed to capture and treat runoff generated from a one-inch storm as defined in the City's Storm Water BMP Guidance Manual (City of Santa Barbara 2020a). Projects which would include fewer than 500 square feet of new or replaced impervious surfaces would be required to implement BMPs within the Storm Water BMP Guidance Manual (City of Santa Barbara 2020a). Development forecasted in accordance with the Housing Plan would implement storm water BMPs consistent with the Storm Water BMP Guidance Manual on a project-by-project basis which would provide methods of groundwater recharge to minimize the potential effects of reducing groundwater recharge due to the addition of impervious surfaces. Therefore, implementation of the Housing Plan would not interfere substantially with groundwater recharge. This impact would be less than significant.

As discussed in the *Surface Water* discussion, development forecasted in accordance with the Housing Plan would be subject to the requirements of the NPDES Construction General Permit, the MS4 Storm Water Permit, the City's Storm Water BMP Guidance Manual, and Municipal Code. These requirements mandate implementation of a SWPPP and project-specific BMPs in order to limit the amount of pollutants generated by a project which could potentially degrade water quality.

Municipal Code requirements prohibit discharge of liquids or solids into the groundwater unless in compliance with applicable regulations of the Central Coast RWQCB. As a result, existing regulations would minimize the potential for the Housing Plan to result in substantial degradation of groundwater quality, resulting in a less than significant impact.

Flood Risk

Special flood hazard zones, either established directly by FEMA or verified by the City/County, exist within the City, primarily near the coast and spreading northwest into the downtown area (City of Santa Barbara 2018). The Housing Plan would increase residential development, thereby potentially increasing the number of people and structures located within a floodplain. Flooding may result in the release of pollutants within the area subject to inundation. Residential housing land uses typically do not involve the storage or use of significant quantities of hazardous materials, such as heavy metals, oil, grease, and nitrate, that would pose a risk of potentially releasing significant quantities of pollutants during a flood. While there is potential for flooding to impact portions of the city, the Housing Plan would not substantially exacerbate the existing flood risk, or risk release of significant quantities of pollutants from materials stored in residences during project inundation.

Pursuant to the City's Floodplain Management Ordinance, proposed development located in FEMA Flood Hazard Zones requires a base flood elevation determination from the Building and Safety Division (City of Santa Barbara 2022a). New residential development forecasted in accordance with the Housing Plan that takes place within a special flood hazard zone would be required to obtain a flood development permit granted by the Floodplain Administrator for the City of Santa Barbara, pursuant to the City of Santa Barbara Municipal Code Section 22.24.110 (City of Santa Barbara 2021b). The Floodplain Administrator grants the permit on the condition that all permit requirements in Chapter 22.24 have been met, including standards for floor elevations, elevations in areas of shallow flooding, elevation or floodproofing of nonresidential structures, wet floodproofing standards, floodway encroachments, and coastal development standards (City of Santa Barbara 2021b). All development in a special flood hazard zone is required to abide by these standards. A small amount of development and redevelopment could continue to occur along the city's major creek corridors and pose the risk of creek bank erosion and potential damage to new or expanded structures. The actual risk of exposure to flooding varies by creek. The Santa Barbara Municipal Code currently requires a minimum 25-foot setback for new development from the top of bank of Mission Creek. This 25-foot minimum setback standard is also used as a general guideline in development application review and permitting for individual projects next to other creeks, based on site specific studies and General Plan flood protection policies in the Environmental Resources, Open Space, and Safety Elements. Greater setback distances are established within the Coastal Land Use Plan and apply to development within the coastal zone. As a result, implementation of the Housing Plan would not conflict with floodway or floodplain regulations and this impact would be less than significant.

4.11.5 Land Use and Planning

Potential Environmental Effects

- Would the project physically divide an established community?
- Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental impact?

Reasons Why Effects Were Not Found Significant

Dividing An Established Community

The Housing Plan would prioritize development of new housing on infill sites in the city. Development forecasted in accordance with the Housing Plan would occur in an urbanized area and would not involve the construction of new roads, railroads, or other large-scale developments with features capable of physically dividing established communities in the city. As discussed in Section 3, *Project Description*, the Housing Plan would prioritize development at sites which are already developed and/or surrounded by existing development in multi-unit and mixed-use zones prioritized along transit corridors and proximity to additional employment opportunities and services. The Housing Plan would provide incentives for the development of housing (including affordable and inclusionary housing) to meet Regional Housing Needs Allocation (RHNA) requirements. Prioritizing development at the sites identified by the Housing Plan would put emphasis on providing a means for residents of Santa Barbara to easily access transit corridors, commercial development, and employment centers. Therefore, the Housing Element would facilitate development in a cohesive manner such that communities would be connected to existing services throughout the City. As a result, the Housing Plan would not be anticipated to physically divide an established community

Land Use Conflicts

Various local and regional plans and regulatory documents guide development in the city. The following discussion addresses the Housing Plan's consistency with applicable requirements and policies of SBCAG's RTP/SCS, the City's General Plan, and the City's Municipal Code, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect. The environmental impacts and mitigation measures discussed in this Program EIR which pertain to land use conflicts associated with development forecasted in accordance with the Housing Plan, such as generation of criteria pollutants and noise compatibility issues, are discussed and evaluated in this Program EIR in Section 4, *Environmental Impact Analysis.*

The Housing Element is a State-required element of the City's General Plan that examines the need for housing in the City, with particular emphasis on the availability and adequacy of housing. The Housing Plan includes actions the City is undertaking to achieve its housing RHNA targets and would also implement SBCAG's land use goals and policies by primarily placing new development in areas with access to transit and services. The Housing Element serves as a comprehensive statement of the City's housing policies and as a specific guide for program actions to be taken in support of those policies. The Housing Plan encourages housing development in infill areas in accordance with the Land Use Element in the City's General Plan and Coastal Land Use Plan. As such, the Housing Plan would comply with the land use pattern established within the General Plan and Coastal Land Use Plan. The Housing Plan would not include policies which would result in substantial environmental impacts due to conflicts with existing General Plan or Coastal Land Use Plan policies. Rather, the Housing Plan's policies have been developed to promote the City's sustainability initiatives, active transportation goals, and provide a methodology for facilitating future residential development in accordance with the growth management policies within the General Plan and Coastal Land Use Plan. By prioritizing residential development at sites which are developed or surrounded by existing development, the Housing Plan would reduce potential impacts associated with development in undisturbed areas, including potential impacts to biological and culturally sensitive areas, risk from wildfire hazards, and the need for substantial additional utility infrastructure. The Housing Element

does not grant entitlements for any project. Future development forecasted in accordance with the Housing Plan would be reviewed by the City for consistency with adopted local and State laws, regulations, standards, and policies. Therefore, the project would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact.

4.11.6 Mineral Resources

Potential Environmental Effects

- Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?
- Would the project result in the loss of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Reasons Why Effects Were Not Found Significant

Loss of Availability of a Known Mineral Resource

The Housing Plan would facilitate residential development on infill sites in urbanized areas of the City. Such development would occur in areas that are not compatible with mineral extraction, such as areas zoned for residential or commercial use. It is not anticipated that new development would occur on any land currently used for mineral extraction. The historic Mesa Oil Field underlies the southwestern portion of City and contains dozens of abandoned oil and gas wells (DOC 2022). As part of the planning application process, the City reviews records of the Mesa Oil Field to determine if abandoned wells may be located within the vicinity of a project. If an abandoned well is encountered, the City coordinates with Cal-GEM and County Environmental Health Services to determine next steps and appropriate measures. Accordingly, potential impacts associated with future individual residential projects located near oil wells would be minimized. Therefore, implementation of the Housing Plan would not result in a loss of availability of a known mineral resource that would be of value to the region and the residents of the State. This impact would be less than significant.

Loss of Locally Important Mineral Resource Recovery Site

The California Geological Survey's (CGS) *Updated Mineral Land Classification Map for Concrete-Grade Aggregates in the San Luis Obispo-Santa Barbara Production-Consumption Region, California – South Half* map indicates that the City is within Mineral Resources Zones-1 (MRZ) and MRZ -3 (CGS 2011). MRZ-1 designations indicate areas containing little or no mineral deposits and MRZ-3 designations indicate deposits identified but require further evaluation. As discussed above, the Housing Plan would not include components capable of limiting or extracting known mineral resources. The City of Santa Barbara does not operate mineral extraction facilities and development forecasted in accordance with the Housing Plan would not be located on an area where important mineral resources are present. Therefore, the project would not result in the loss of a locally important mineral resource recovery site.

4.11.7 Population and Housing

Potential Environmental Effects

- Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Reasons Why Effects Were Not Found Significant

Unplanned Population Growth

The Santa Barbara County Association of Governments' 2050 Regional Growth Forecast (2050 RGF) (Santa Barbara County Association of Governments 2018) forecasts demographic changes for the major economic and demographic regions and the eight incorporated cities of Santa Barbara County. Significant population increases are projected in northern Santa Barbara County, while population increases in the South Coast region are expected to be substantially less. During the 2017-2050 forecast period the South Coast region is forecast to grow in population by about 15,850, or approximately seven percent, while North County is expected to grow by about 52,410, or approximately 22 percent. The City of Santa Barbara's population is projected to reach 102,000 by the year 2050. This represents a 4.8 percent total change or a 0.19 percent annual average increase from 2025 to 2050.

According to recent DOF estimates, from 2010 to 2022, the City's population actually decreased from 88,410 to 86,591, a 2 percent total decrease (or a 0.17 percent annual average decrease). (DOF 2022; E-5 Population and Housing Estimates). The largest population growth occurred between 2010 and 2016, with an increase in 4,467 people (5.1 percent), representing an average annual growth rate of 1.5 percent. However, in the years since 2016, the City's population rate of growth has been considerably slower, with occasional decreases in population.

The Housing Plan would emphasize the creation of new housing units within multi-unit and commercial zones where the highest densities are allowed. Development forecasted in accordance with the Housing Plan anticipates a potential increase of up to 8,001 residential units, consistent with Santa Barbara's RHNA allocation for the 2023-2031 planning period. SBCAG's 2050 RGF projections are used in the methodology for allocating the RHNA within the metropolitan planning organizations. In addition, the Housing Plan does not propose any changes in land use to meet the City's RHNA allocation. The State requires that all local governments adequately plan to meet the housing needs of their communities. The Housing Plan would implement the guidance established in the Housing Element to meet the City's housing need. Therefore, the projected increase in the population of Santa Barbara would not be reasonably anticipated to exceed the long-term regional population growth anticipated by the 2050 RGF (99,900 people by 2035; an increase of 13,309 people), and the Housing Plan would not induce substantial unplanned population growth in the City, as necessary to meet State housing law requirements. This impact would be less than significant.

Displacement of People or Housing

The Housing Plan would not displace existing people or housing. The goals, policies, and objectives included in the Housing Plan are designed to prevent displacement and promote housing stability. Development forecasted in accordance with the Housing Plan is anticipated to result in an increase of up to 8,001 new residential units by 2035, and it is anticipated that any replacement housing created by displacement of existing housing would be offset through implementation of the Housing Plan. As discussed in Chapter 3, *Project Description*, the Housing Plan would implement an Affordable Housing Strategy to encourage development of new affordable housing for moderate-, low-, very low-, and extremely low-income households. Programs within the Housing Plan would continue and expand existing City programs which preserve and increase the affordable housing stock and assist in the production of affordable and special needs housing. Furthermore, the Housing Plan would facilitate amendments to the Zoning Ordinance to regulate legal short-term rentals and rezone or otherwise limit some areas of the City that allow both residential and hotel use, with the aim of minimizing displacement of existing long-term housing and properties which could accommodate housing. Therefore, implementation of the Housing Plan would not displace substantial numbers of existing people or housing, and impacts would be less than significant.

4.11.8 Public Services

Potential Environmental Effects

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
  - Fire protection
  - Police protection
  - Parks
  - Other public facilities (e.g., libraries)

Note that the potential for the project to result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, is discussed in Section 4.8, *Schools*.

Reasons Why Effects Were Not Found Significant

Fire Protection

The City of Santa Barbara Fire Department (SBFD) provides fire protection and other emergency and nonemergency services including fire and life safety inspections, building inspections, fire code investigations, code compliance, and development review in accordance with current standards. The SBFD operates seven fire stations located within the City and one aircraft rescue fire station located at the Santa Barbara Municipal Airport. The SBFD is able to reach a majority of the City, excluding certain areas in the foothills and the eastern and western boundaries of the City limits, within four minutes (City of Santa Barbara 2021f). The City's Public Works Department has

developed an extensive water distribution system including water reservoirs and fire hydrants with fire flow ratings sufficient for fire suppression (City of Santa Barbara 2021f).

The entire city is within the service area of the SBFD, and the majority of the City is connected to the City water system. A portion of the City's Extreme Foothill High Fire Hazard Zone is not connected to the City's water system. However, the City's Municipal Code requires a water tank with a minimum capacity of 10,000 gallons to be provided for fire protection purposes for buildings (City of Santa Barbara 2021f). Therefore, future residential development would have access to water infrastructure necessary for firefighting.

As discussed in Section 4.11.7, *Population and Housing*, the projected increase in the population of Santa Barbara would not be reasonably anticipated to exceed the long-term regional population growth anticipated by the 2050 RGF (99,900 people by 2035; an increase of 13,309 people), and the Housing Plan would not induce substantial unplanned population growth in the city, as necessary to meet State housing law requirements. As a result, the Housing Plan would not create the potential to increase the population in a manner that would increase calls for service and demand for fire protection services beyond what is reasonably anticipated under current planning conditions. Individual residential development would be required to comply with the Fire Code and requirements for construction, access/egress, water mains, fire flows and hydrants, and would be subject to review and approval by SBFD prior to Building Permit approval and occupancy. New construction projects that are compliant with current standards for fire-resistant building materials, fire alarms and sprinklers, and defensible space, would also increase fire safety and reduce fire risk.

Individual development projects have the potential to result in the need for expanded additional fire protection service facilities or apparatus, the scope of which is currently unknown. The City would ensure as part of the planning review process that adequate fire protection services, equipment, and personnel are available to serve proposed development projects. Therefore, the Housing Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, and this impact would be less than significant.

Police Protection

Law enforcement for the City of Santa Barbara is provided by the Santa Barbara Police Department (SBPD). The SBPD is comprised of three divisions including the Patrol Division, Investigative Division, and the Community Service Division which provides services including emergency and non-emergency police response, routine police patrols, investigative services traffic enforcement, traffic investigation, and parking code enforcement. The SBPD headquarters is located at 215 East Figueroa Street and the Community Services Division is located at 222 East Anapamu Street. In addition, a new SBPD station which would accommodate existing SBPD staff has completed environmental review and is planned for construction at 601 Santa Barbara Street.

As discussed in Section 4.11.7, *Population and Housing*, the projected increase in the population of Santa Barbara would not be reasonably anticipated to exceed the long-term regional population growth anticipated by the 2050 RGF (99,900 people by 2035; an increase of 13,309 people), and the Housing Plan would not induce substantial unplanned population growth in the City, as necessary to meet State housing law requirements. As a result, the Housing Plan would create the potential to increase the population in a manner that would increase calls for service and demand on SBPD beyond what is reasonably anticipated under current planning conditions. The entire city is located within the service area of the existing and planned SBPD stations. Development forecasted in accordance with the Housing Plan would be served by existing and planned police facilities. Therefore, the Housing Plan would not result in a substantial adverse physical impact associated

with the provision of new or physically altered police protection facilities, and this impact would be less than significant.

Park Services

The City contains approximately 1,827 acres of parkland and access to 6.2 miles of beaches (City of Santa Barbara 2022d). The majority of park acreage is contained within natural open space parks such as Parma Park, Gould Park, and Rattlesnake Canyon Park. Developed parks within the City provide ball fields, beach volleyball courts, four swimming pools, 33 tennis and pickleball courts, a golf course, and a skateboard facility. There is an overall ratio of approximately 21.1 acres of park land per 1,000 residents (City of Santa Barbara 2022d). The anticipated population growth forecasted in accordance with the Housing Plan (refer to Section 4.11.7, *Population and Housing*) would result in a ratio of approximately 18.3 acres of park land per 1,000 residents which is 15.3 acres greater than the acceptable minimum ratio established by the State (via the Quimby Act) of 3.0 acres of park land per 1,000 residents. Therefore, the Housing Plan would not result in a substantial adverse physical impact associated with the provision of new or physically altered parks, and this impact would be less than significant.

Library Services

The Housing Plan would emphasize the creation of new housing units within multi-unit and commercial zones where the highest densities are allowed, which could increase demand for other public facilities, such as libraries. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the City, necessitating construction of a new or physically altered library, which could have significant physical impacts on the environment.

The Santa Barbara Public Library system includes two branches in the City limits: the Central branch, located at 40 East Anapamu Street; and the Eastside branch, located at 1102 East Montecito Street. Potential future residents may use these libraries, increasing the number of library facility users. However, there are two additional libraries, the Goleta Valley Library and the Santa Barbara Public Library Montecito branch, within four miles from the City limits that would also continue to accommodate residents.

Implementation of the Housing Plan is not expected to result in a substantial increase in demand for library facilities that would exceed the capacity of existing facilities or to generate a substantial demand for the community branch libraries serving the City, and the City does not anticipate that expansion or construction of new library facilities would be required. Since the Housing Plan would not substantially affect the need for new or physically altered public facilities, this impact would be less than significant.

4.11.9 Recreation

Potential Environmental Effects

- Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Reasons Why Effects Were Not Found Significant

Physical Deterioration of Existing Recreational Facilities

Recreational amenities in Santa Barbara include approximately 1,827 acres of park land comprised of passive parks, neighborhood parks, community parks, regional parks, beach parks, open space parks, and sports fields (City of Santa Barbara 2022d). Many of these parks include indoor and outdoor facilities that provide or host adult classes, aquatics, camps, outdoor picnics, weddings, photo shoots, and special events. City Parks and Recreation charges use fees that fund Parks staff and maintenance crews to ensure the facilities do not deteriorate.

Development forecasted in accordance with the Housing Plan could add approximately 13,309 new residents to the city and could include multi-family residential development without open yards which would further increase the use and demand of existing neighborhood and regional parks. However, the City annual budget process and Capital Improvement Program includes the monitoring of park facility needs and conditions. A number of major park renovation projects are currently underway, including Ortega Park and Dwight Murphy Field. Impacts associated with the Housing Plan would be less than significant.

New or Expanded Recreational Facilities

The Housing Plan would not include the construction of recreational facilities and would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, any direct or indirect impacts would be less than significant.

4.11.10 Wildfire

Potential Environmental Effects

If the project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

- Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?
- Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, or thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- Would the project require the installation or maintenance of associated infrastructure (such as roads, fuelbreak, emergency water sources, power lines, or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?
- Would the project expose people or structures to significant risks, including downslope or downstream flooding, landslides, mud flows, as a result of runoff, post-fire slope instability, or drainage changes?

Reasons Why Effects Were Not Found Significant

Impairment of Emergency Evacuation or Emergency Response Plans

The city includes State designated Very High Fire Hazard Severity Zones in the northeast and northwest portions of the City and local designated High Fire Hazard Areas mainly in areas with land use designations of open space, hillside low density residential, and low density residential, as well as a small portion of land designated medium density residential (California Department of Forestry and Fire Protection [CAL FIRE] 2008). Although most of the residential development facilitated by the Housing Plan would occur outside of designated fire hazard areas, housing development in these fire hazard areas could include single-unit homes, accessory dwellings units, and multi-unit dwellings in limited locations. This development could result in additional traffic in and around designated Very High Fire Hazard Severity Zones and High Fire Hazard Areas. The City's Emergency Operations Plan (2021) provides direction for traffic control and management in emergency situations.

The City completed an update to the Community Wildfire Protection Plan (CWPP) in 2021, aimed at mitigating wildland fire impacts (City of Santa Barbara 2021f). The City's Annex to the County's Multi-Jurisdictional Hazard Mitigation Plan (2023) includes a high priority project to combine the CWPP and 2014 Evacuation procedures analysis, identify roads that do not meet Fire Department standards, and conduct a detailed evacuation study.

As part of standard development procedures in the City, development plans must be submitted to the City's Community Development Department for review and approval to ensure that new development has adequate emergency access and escape routes in compliance with existing City and Fire Department regulations. The Housing Plan would not introduce new features or policies that would preclude implementation of or alter these policies or procedures. Therefore, implementation of the Housing Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and this impact would be less than significant.

Wildfire Risk from Slope, Prevailing Winds, or Other Factors

Development facilitated by the Housing Plan that would occur within a Very High Fire Hazard Severity Zone or High Fire Hazard Area could be located on slopes which could exacerbate wildfire risk. However, new development would be subject to several regulatory standards that would limit wildfire risk. Title 14 of the California Code of Regulations sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply. The City's CWPP sets standards for defensible space, which is the buffer created between development and surrounding vegetation. Under the CWPP, a minimum of 150 feet of defensible space is required in Very High Fire Hazard Severity Zones. On slopes greater than 30 percent, up to 300 feet would be required, subject to the discretion of the City of Santa Barbara Fire Department (City of Santa Barbara 2021f). Other Fire Hazard Areas in the City require 30 – 100 feet of defensible space. In addition, new development within a Vegetation Management Unit, as defined by the City of Santa Barbara Fire Department, would be subject to project standards set forth for that particular Vegetation Management Unit by the Fire Department, which include defensible space treatments to remove or alter vegetative cover or reduce fuel loads (City of Santa Barbara 2021f). Compliance with applicable regulations and standards would minimize the wildfire risk (City of Santa Barbara 2020b).

All development that would occur in a Very High Fire Hazard Severity Zone or High Fire Hazard Area is required to be designed to meet high fire construction standards as determined by the Chief Building Official or the Fire Code Official (City of Santa Barbara 2021b). Consequently, development forecasted in accordance with the Housing Plan would be subject to applicable regulatory standards set forth by the State and the City that minimize fire risk associated with development that occurs on a slope. Therefore, the project would not exacerbate wildfire risks, and this impact would be less than significant.

Fire Risk from Installation or Maintenance of Associated Infrastructure

Development facilitated by the Housing Plan that would occur in a Very High Fire Hazard Severity Zone or High Fire Hazard Area could increase potential for wildfire due to the installation or maintenance of associated infrastructure. During construction, heavy equipment and passenger vehicles driving on vegetated areas prior to clearing and grading could increase the risk of a fire. However, any new construction would be subject to the current California Fire Code, which contains safety measures to minimize the threat from wildfires. California Public Resources Code Section 4290 requires minimum fire safety standards for roads, fuel breaks, green belts, and minimum water supply. California Public Resources Code Section 4291 requires maintenance of a minimum 100 feet of vegetation management around all buildings. Pursuant to the CWPP, this minimum requirement is extended to 150 feet within Very High Fire Hazard Severity Zones (City of Santa Barbara 2021h). The installation and maintenance of associated infrastructure would be carried out in accordance with these standards. Available water supply is addressed in Section 4.11.4, *Hydrology and Water Quality*.

New development within a Vegetation Management Unit would be subject to project standards set forth for the Vegetation Management Unit by the City of Santa Barbara Fire Department, which includes defensible space treatments to remove or alter vegetative cover or reduce fuel loads (City of Santa Barbara 2021f). Consequently, new development and associated infrastructure within a Very High Fire Hazard Severity Zone or High Fire Hazard Area would be constructed and operated in a manner that minimizes fire risk. Although development forecasted in accordance with the Housing Plan could require the installation or maintenance of associated infrastructure, adherence to applicable regulations and standards would minimize the potential for the associated infrastructure to exacerbate fire risk that may result in temporary or ongoing impacts to the environment. This impact would be less than significant.

Exposure to Post-Fire Flooding and Landslides

Wildfire can exacerbate slope failure and landslides. Hillsides can become denuded of vegetation and become unstable, increasing the potential for landslide risks and associated hazards downslope from such landslides. In 2018, the Thomas Fire exacerbated slope failure in the Santa Ynez mountains which triggered a series of mudflows that resulted in 23 deaths and the destruction of more than 100 residences (California Office of Emergency Services 2021). Accordingly, the foothill areas of the city are at risk of mudflows triggered due to post-fire instability. Individual residential development projects located in the foothills would be constructed in accordance with applicable state and local regulations which set standards for structural integrity, erosion control, and defensible space. As discussed in Section 4.11.3, *Geology and Soils*, future development forecasted in accordance with the Housing Plan would be required to comply with the CBC's minimum standards for structural design and site development. As part of standard procedures the SBFD is required to undergo pursuant to the CWPP, following any wildlife that burns into the CWPP plan area a post-fire field assessment shall be conducted by an engineering geologist to identify areas

that may be subject to increased risk of post-fire flooding, landslide, or erosion, and any recommendations identified by the geologist to mitigate risks are required to be implemented by the City (City of Santa Barbara 2021f). As described above in the *Impairment of Emergency Evacuation or Emergency Response Plans* discussion, development plans are required to be submitted to the City's Community Development Department for review and approval to ensure that new development has adequate emergency access and escape routes in compliance with existing City and Fire Department regulations. Accordingly, development forecasted under the Housing Element would provide adequate escape routes for residents in the event of a mudflow. As a result, the Housing Element would not be anticipated to put people or structures at a substantial risk due to mudflow.

Development forecasted in accordance with the Housing Element within Very High Fire Hazard Severity Zones or High Fire Hazard Area may occur in locations zoned for low and medium density residential development, such as single-unit homes, accessory dwelling units, and multi-unit dwellings in limited locations. As noted above, regulatory standards set forth by the State and the City that minimize fire risk associated with development that occurs on a slope would reduce the risk.

Therefore, implementation of the Housing Element would not expose people or structures to significant risks, including downslope or downstream flooding, landslides, or mud flows, as a result of runoff, post-fire slope instability, or drainage changes. This impact would be less than significant.

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